

Transparency Statement 2025

Tibber's efforts towards transparent and responsible supply chains

Overview of Tibber's business

Tibber is a digital energy company that empowers households to lower their electricity consumption and costs through smart, technology-driven solutions. To support this mission, Tibber offers electricity contracts, automated energy management services, a mobile app with real-time consumption insights, and an online store featuring home energy management products. Tibber operates in four markets, Norway, Sweden, Germany, and the Netherlands.

Tibber is structured as a matrix organization. The Group headquarters is located in Førde, Norway. The company also holds offices in Oslo, Stockholm, Berlin, Amsterdam, and Helsinki (until December 2025). The Group consists of a parent company and seven wholly-owned subsidiaries:

Parent company:

- Tibber AS

Subsidiaries:

- Tibber Norge AS
- Tibber AB
- Tibber Norge Strøm AS
- Tibber Oy
- Tibber Deutschland GmbH
- Tibber Netherlands B.V.
- Tibber Denmark A/S

Tibber sells various third-party products in the Tibber Store, while Tibber Pulse and Tibber Bridge are designed in-house. Their production is managed by a Norwegian supplier based in Horten, with manufacturing taking place in Poland and China.

Process to enhance responsibility and transparency

Tibber is a member of the UN Global Compact and reports annually on the ten principles. The company has incorporated the United Nations Guiding Principles for Human Rights into its internal code of conduct and its supplier code of conduct.

Tibber's processes and routines to enhance responsible supply chain management align with the OECD guidelines and are approved by the board and top management. This includes Tibber's supplier code of conduct that is aligned with the OECDs guidelines and reviewed by EY and Factlines. It is publicly available via tibber.com/en/supplier-code-of-conduct.

Factlines is a software provider with whom Tibber collaborates to conduct supplier due diligence in accordance with the Norwegian Transparency Act. A risk assessment is conducted via a questionnaire sent to Tibbers suppliers.

External reports identify a material risk associated with sourcing certain minerals commonly used in electronic devices, especially tantalum, tin, tungsten and gold, collectively known as 3TG or "conflict minerals". Therefore, Tibber prioritises efforts towards hardware suppliers for the Tibber Store.

If a Tibber supplier is categorised as "high risk", initiatives such as additional documentation or audits will be undertaken to further investigate the situation. In the event of actual breaches, Tibber will take action to mitigate the consequences and prevent further incidents.

With the Norwegian *Transparency Act* that came into effect in 2022, Tibber has also established routines to manage incoming requests. Questions can be directed to sustainability@tibber.com, and incidents can be reported through Tibber's whistleblowing mechanism found at app.falcony.io/tibber-wb/links/whistleblowing.

2025 due diligence results

Tibber's Supplier Code of Conduct has been adopted by our key suppliers, and we are committed to referencing it in all new and renewed supplier agreements.

In 2025, all suppliers delivering products or related installation services to the Tibber Store, with a purchase volume exceeding 250,000 NOK (2024: 500,000 NOK), were asked to conduct a risk assessment covering human rights, working conditions, corruption, supply chain practices, governance, and environmental impact.

Of the 28 suppliers meeting this threshold, 25 responded to our due diligence screening as of 31 December 2025. Three suppliers did not respond despite repeated follow-up attempts; we will continue engaging with them in 2026.

Among the 25 respondents, 22 were assessed as low risk, two as medium risk, and one as high risk (2024: 21 low risk, five medium risk). No human rights violations or concrete breaches were reported.

The high-risk supplier was a small Netherlands-based retailer flagged for the absence of formal guidelines and supply chain oversight. As the business relationship had already been discontinued in 2025 for unrelated commercial reasons, no further follow-up measures were taken.

The two medium-risk suppliers were a European electronic retailer with more than 250 employees and a European installation company with fewer than 50 employees. Both were classified as medium risk by Factlines due to incomplete supply chain visibility and partly underdeveloped risk management systems. Nevertheless, these gaps were not isolated to these suppliers. Across the broader portfolio, including several low-risk suppliers, 11 of the 25 assessed lacked conflict mineral policies and systematic supply chain follow-up routines.

Efforts to mitigate risk of human right violations

The risks identified primarily relate to suppliers where formal policies, supply chain oversight, and management systems are still being developed. We do not assess the medium-risk findings as representing immediate human rights concerns, but treat them as ongoing monitoring priorities.

On conflict minerals specifically, we have initiated dialogue with key suppliers. Given the complexity of tracing minerals across multi-tier supply chains, our 2026 priorities are to define clear internal priorities and expectations, pilot AI-supported supply chain mapping, and build awareness among employees and suppliers of their requirements and reporting obligations.

As Tibber Store suppliers included in the 2025 survey represented more than 90% of total purchase volumes, we will aim to maintain equivalent coverage in the 2026 assessment, and will evaluate whether further adjustments to the inclusion threshold are warranted. We will also continue to strengthen our procedures to fully integrate risk assessment into the onboarding process for new suppliers.

We will publish our next transparency statement by 30 June 2027.

Board signatures

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