

HUMAN RIGHTS STATEMENT 2025



NORDIC[®]
SEMICONDUCTOR

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Introduction

This statement is published in accordance with Section 5 of the Norwegian Transparency Act (Åpenhetsloven). It provides an account of Nordic Semiconductor ASA ("the Company") and its subsidiaries (together, "Nordic" or "the Group") human rights due diligence ("HRDD") activities for the period from 1 January to 31 December 2025. The statement is updated and published by 30 June 2026, in accordance with the requirements of the Act.

Scope of this statement

This statement is prepared on the same consolidated basis as the financial statements for the year ended 31 December 2025. It includes the Group as specified in Note 17.2 "Subsidiaries" of the Annual Report 2025. This approach ensures consistency in reporting and provides a comprehensive view of HRDD across the Group.

As the Norwegian parent company, Nordic Semiconductor ASA is responsible for conducting HRDD for its own operations and those of its subsidiaries, regardless of where these subsidiaries are registered. Compliance with the Group's human rights commitments is cascaded to subsidiaries through Nordic's Code of Conduct, HRDD process, and related group-level policies.

Information relating to business relationships with suppliers and other business partners in the value chain is included throughout this statement, in accordance with the Norwegian Transparency Act's focus on supply chains and business relationships.

This statement should be read in conjunction with the Sustainability Statement included in the Annual Report 2025.

General Description of the Enterprise (Section 5a)

Company structure and area of operations

Nordic Semiconductor ASA ("the Company") is a fabless semiconductor company that designs, markets, sells, and supports hardware products, embedded software, and cloud-based services enabling wireless connectivity solutions.

The Group has been a pioneer in low-power wireless connectivity since its establishment in 1983. Over time, Nordic has developed into a leading global supplier of Bluetooth® LE and multiprotocol solutions for short-range connectivity and has expanded into cellular IoT and embedded Wi-Fi technologies. In 2025, Nordic further strengthened its chip-to-cloud offering through the acquisition of Memfault, adding device monitoring and cloud-based lifecycle management capabilities.

Nordic's product portfolio includes integrated circuits (ICs), System-on-Chip (SoC) solutions, System-in-Package (SiP) devices, and software development tools. The Group relies on subcontractors, primarily in Asia, for manufacturing, assembly, and packaging, and distributes products globally through a network of distribution partners.

The Company is headquartered in Trondheim, Norway, and operates globally through offices in Europe, Asia, and North America.

As a fabless semiconductor company, Nordic does not directly employ manufacturing workers but maintains business relationships with manufacturing partners. The Group is therefore committed to

respecting human rights both in its own operations and across its value chain.

The Board of Directors has ultimate responsibility for governance, including oversight of human rights due diligence (HRDD) and approval of key policies and initiatives.

Nordic Semiconductor Business Model

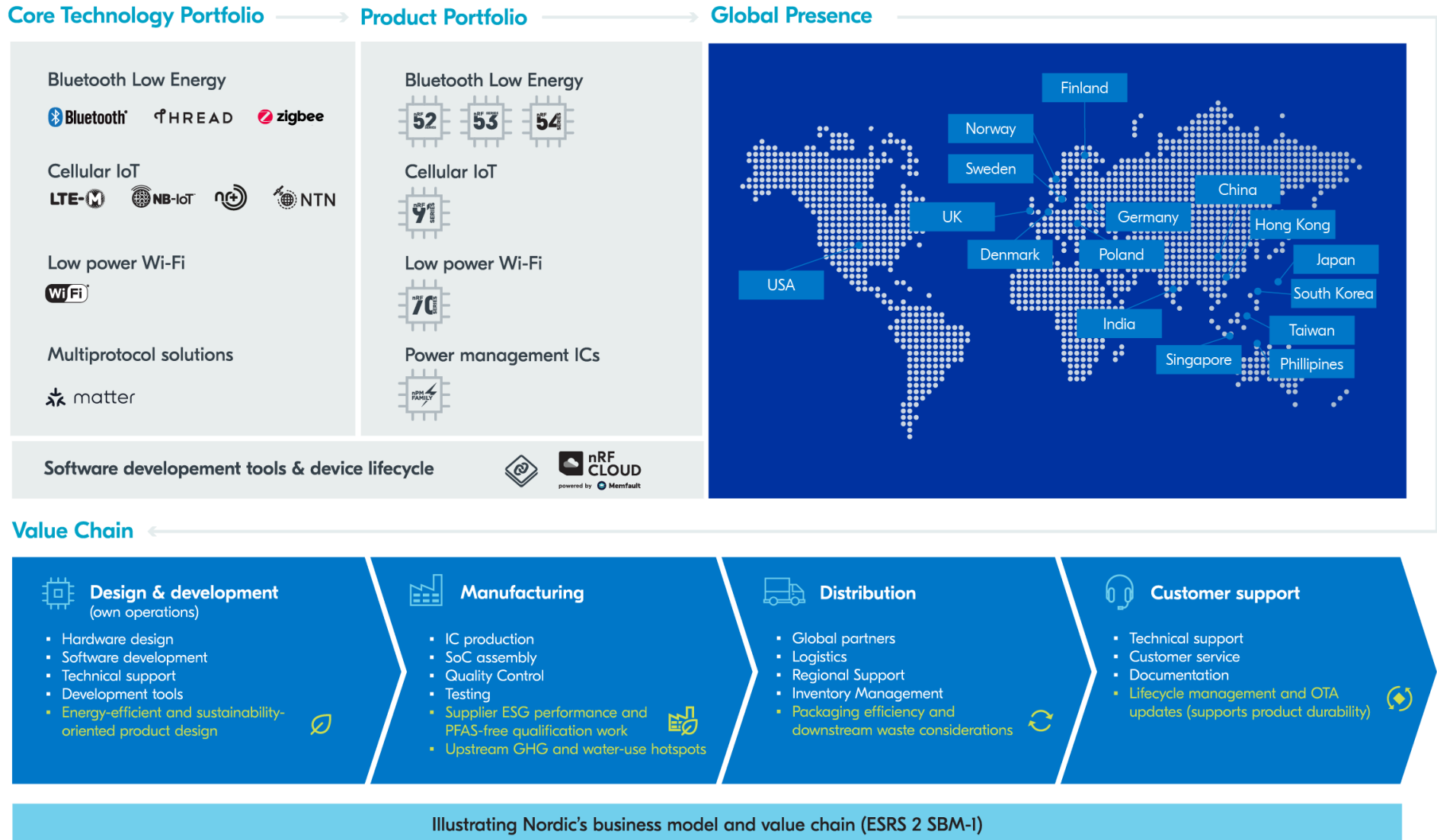


Figure 1: Nordic's Business Model and Value Chain

Guidelines and procedures for human rights due diligence

Nordic’s approach to HRDD is guided by internationally recognized frameworks, including the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and the International Labour Organization (ILO) core conventions. Nordic also adheres to the Responsible Business Alliance (RBA) Code of Conduct and complies with the Norwegian Transparency Act.

The Group’s HRDD process follows the OECD’s risk-based due diligence model. This includes integrating responsible business conduct into policies and management systems, identifying and assessing potential adverse impacts, implementing measures to prevent or mitigate such impacts, tracking effectiveness, communicating externally, and providing for or cooperating in remediation where appropriate.

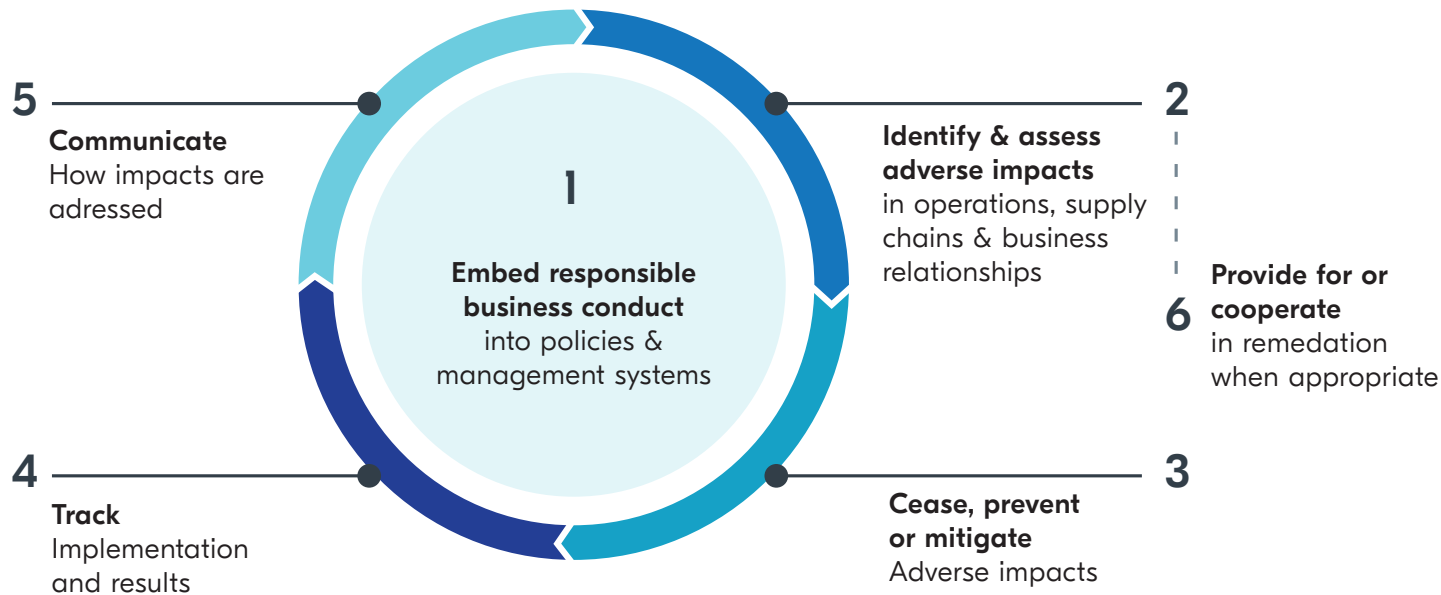


Figure 2: OECD Due Diligence Process for Responsible Business Conduct

Key policies and procedures

Nordic's HRDD framework is supported by a set of core policies and procedures, including:

- Code of Conduct
- Human Rights Policy
- Supplier Code of Conduct
- Corporate Social Responsibility Policy
- Conflict Minerals Policy
- Reporting and Handling of Concerns Procedure

In addition, internal policies address equal opportunities, anti-harassment, and health and safety. Together, these policies establish expectations for responsible business conduct in both Nordic's operations and its value chain.

Governance and implementation structure

Human rights due diligence is embedded in Nordic's governance structure. The Board of Directors provides overall oversight of human rights due diligence, with specific oversight of sustainability-related matters delegated to the Audit Committee.

Operational responsibility is distributed across executive management. The CEO oversees implementation of the Human Rights Policy, while responsibility for supply chain-related policies rests with senior management, including the SVP Quality and EVP Supply Chain. Day-to-day coordination of HRDD activities is managed by the Legal & Compliance function, with the Head of Compliance responsible for monitoring effectiveness.

The ESG Committee, comprising the Executive Management Team, supports coordination across the organization and integrates stakeholder input into decision-making. Implementation is carried out within business functions, with all employees expected to respect human rights in their work.

Nordic draws on external expertise and third-party platforms, including a third-party ESG management tool and the RBA Validated Assessment Program, to support the implementation of its HRDD program. Responsibility for the design, oversight, and decision-making of the Group's human rights due diligence remains with Nordic and is not delegated to external service providers.

Risk assessment methodology

Nordic conducts an annual double materiality assessment (DMA), which forms the basis for identifying and prioritizing human rights risks in accordance with the Norwegian Transparency Act as part of the Group's integrated HRDD and sustainability reporting process.

Nordic's annual DMA follows a structured process. Sustainability matters and human rights impacts are first identified through review of internal and external information, including RBA audit findings, third-party ESG assessments, supplier responses, regulatory developments, and stakeholder input. Identified impacts are then evaluated using severity-led criteria aligned with the UNGPs: severity for negative impacts is derived from scale, scope, and remediability; positive impacts from scale and scope. In line with OECD due diligence standards, the severity threshold for human rights impacts is adjusted downward before comparison with other impacts, ensuring that severe potential harms receive appropriate weight even where the likelihood is lower.

Identified risks are validated by relevant business functions and the Executive Management Team through the ESG Committee, with oversight by the Audit Committee, and are reflected in the Group's enterprise risk assessment (ERM), with further alignment between the DMA and ERM frameworks planned for future cycles. The DMA was last updated in Q3 2025 and is scheduled for the next full revision in Q3 2026, supplemented by ongoing monitoring throughout the year. The methodology itself is reviewed when material changes in the operational, business, or regulatory context warrant adjustment.

Nordic recognizes that its connection to identified risks of adverse impacts is not static. The Group's role in relation to a particular risk—whether causing, contributing to, or being directly linked to harm—may evolve over time, depending on the adequacy of the due diligence measures Nordic implements and changes in the operational or business context. Nordic therefore reviews its connection to identified risks as part of its annual HRDD cycle and adjusts measures accordingly.

Stakeholder engagement processes

Engagement with stakeholders is an integral part of Nordic's HRDD approach. The Group engages with various stakeholder groups whose perspectives inform our human rights approach. This includes employees, suppliers, customers, and distributors. Engagement with customers and distributors takes place through regular business interactions, including periodic meetings and performance reviews, which provide insights into expectations related to responsible business conduct across the value chain. Nordic also participates in industry initiatives, monitors regulatory developments, and responds to inquiries received under the Norwegian Transparency Act.

Employee engagement includes representative forums, surveys, and regular internal communication channels. Engagement with value chain workers is primarily conducted indirectly through supplier relationships and third-party mechanisms, consistent with Nordic's fables business model and limited operational control. This includes supplier interactions, human rights questionnaires, and RBA audit processes, which provide insights into working conditions and labor practices at assessed facilities. Nordic has not established direct engagement channels with value chain workers. The limits of this indirect approach are acknowledged, and Nordic continues to consider how accessibility might be improved over time.

Insights from stakeholder engagement are used to inform risk assessments, prioritization of actions, and the development of mitigation measures. For example, findings from supplier questionnaires and RBA audit processes indicated patterns of gender-segregated roles at certain Tier-I manufacturing facilities. These insights informed targeted follow-up dialogues with suppliers during 2025, focusing on equal opportunity practices and workforce representation.

Grievance and remediation mechanisms

Nordic maintains grievance mechanisms aligned with the UNGPs and OECD Guidelines, enabling both internal and external stakeholders to raise concerns.

The Integrity Line is the primary reporting channel and allows confidential and anonymous reporting. Additional channels are available for employees and business partners.

Reported concerns are handled through a structured case management process that includes investigation, follow-up, and, where relevant, remediation. The Head of Compliance oversees case handling and reports to senior management and the Board.

Nordic enforces a strict no-retaliation policy and expects its suppliers to maintain appropriate grievance mechanisms in line with the Supplier Code of Conduct and the RBA Code of Conduct.

During the reporting period, Nordic received eight complaints through its grievance channels. No incidents of discrimination, harassment, or severe human rights impacts were identified.

The complaints were handled through Nordic's structured case management process. A review of the cases did not reveal any systematic issues, and all matters were resolved or are under active follow-up in accordance with Nordic's Reporting and Handling of Concerns Procedure.

Actual Adverse Impacts and Material Risks Identified (Section 5b)

Actual adverse impacts

Through its human rights due diligence (HRDD) process, Nordic evaluates potential adverse impacts on fundamental human rights and decent working conditions, as defined in the Norwegian Transparency Act. These assessments are informed by supplier assessments, RBA audits, and stakeholder engagement conducted during the reporting period from 1 January to 31 December 2025.

During 2025, Nordic's HRDD process drew on a combined evidence base, including: 100% high-level screening of the Tier-1 supplier base via a third-party ESG management tool; 8 RBA Self-Assessment Questionnaires from priority Tier-1 suppliers; 9 third-party ESG ratings and vitals assessments of medium-high-risk Tier-1 suppliers; 7 responses to the Nordic HRDD questionnaire; review of 3 RBA Validated Assessment Program audit reports and continued follow-up of open findings from a 2024 audit; 100% CMRT reporting coverage with review of RMI smelter conformance status; and 8 complaints received through Nordic's internal grievance channels covering own operations. This combined evidence base informed the assessment below.

During the reporting period, Nordic did not identify any actual adverse impacts in its own operations or value chain that met the threshold defined under the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.¹

Nordic recognizes that the absence of identified impacts does not eliminate the risk of potential adverse impacts and continues to monitor and assess its operations and value chain accordingly.

Where concerns or non-conformances were identified, these were addressed through established follow-up processes, including corrective actions and ongoing monitoring.

¹ For this statement, an "actual adverse impact" refers to a situation where harm to internationally recognized human rights has occurred and is caused by, contributed to by, or directly linked to the company's own activities or business relationships.

Material risks of adverse impacts

Based on the Group's annual double materiality assessment, supplier assessments, and industry knowledge, Nordic has identified several material risks of adverse human rights impacts. These risks are prioritized based on severity, in line with the UNGPs.

Own workforce risks

Nordic has identified the following material human rights risks related to its own workforce:

Equal treatment and opportunities

Nordic recognizes challenges related to representation and equal opportunities across its workforce. Women remain underrepresented in senior and technical roles. The Group continues to assess potential drivers of these gaps, including recruitment practices and career development pathways.

Access to learning and development

Differences in access to structured learning and development opportunities may affect career progression for certain employee groups, including employees in smaller locations or transitional roles.

Workload and well-being

Periods of high workload during peak project cycles may present risks related to stress and fatigue. In addition, the predominantly desk-based nature of work may pose longer-term health considerations. These risks are monitored through employee feedback mechanisms and health and safety management systems.

Upstream supply chain (Tier 2+ suppliers and raw materials)

Working conditions and labor rights

In upstream segments of the semiconductor supply chain, including mineral extraction and initial processing, there are inherent risks related to working hours, wages, employment conditions, child labor, and forced labor. These risks may be elevated in regions with varying levels of regulatory oversight and limited visibility.

Occupational health and safety

Raw material extraction and processing involve inherent occupational health and safety risks, including exposure to hazardous working conditions. Nordic addresses these risks primarily through its conflict minerals due diligence program and engagement with the Responsible Minerals Initiative (RMI).

Tier 1 suppliers (including logistics providers)

Equal opportunities and representation

At manufacturing facilities, Nordic has observed patterns of role distribution where operational positions are predominantly held by women, while technical and managerial roles are more often held by men. This may indicate risks related to equal opportunities for advancement.

Occupational health and safety

Manufacturing environments present inherent health and safety risks. Nordic monitors these through supplier assessments and RBA audit processes.

Migrant worker vulnerabilities

Migrant workers may face particular risks related to recruitment practices, living conditions, and access to grievance mechanisms. Nordic recognizes this group as potentially vulnerable and monitors related risks through targeted due diligence assessments, with corrective action initiated where findings warrant.

Working conditions in logistics operations

Workers involved in transportation may face risks related to working hours and safety conditions. Nordic has identified that logistics providers may outsource transport activities, which can limit visibility into working conditions. This is addressed through ongoing engagement with logistics partners.

Geopolitical and conflict-related risk

Parts of Nordic's manufacturing footprint and supply chain are located in regions exposed to geopolitical tension or conflict-related risk. Nordic monitors developments in such areas as part of its ongoing risk assessment and applies heightened due diligence where the risk picture changes materially. During 2025, Nordic did not identify specific operations or suppliers requiring exit or remediation on conflict-related grounds, beyond measures already taken under the conflict minerals due diligence program. This assessment is reviewed on a continuing basis.

Measures Implemented or Planned (Section 5c)

In response to the identified risks, Nordic has implemented and continues to develop preventive and mitigating measures across its operations and value chain. These measures are integrated into Nordic's ongoing HRDD program and supplier management processes.

Supply chain due diligence

During 2025, Nordic continued to develop its due diligence approach through the following key initiatives:

- Risk-based screening: Nordic transitioned its Tier-1 supplier screening from KPMG's HRDD tool to a third-party ESG supplier risk management platform. The platform supports systematic risk identification and prioritization across the Tier-1 supplier base, with in-depth assessments conducted on suppliers identified as higher-risk. Due to differences in methodology, results for 2025 are not directly comparable to prior-year assessments.
- Supplier Code of Conduct: Nordic published and distributed its Supplier Code of Conduct to key manufacturing and logistics partners, establishing expectations for labor standards, responsible recruitment, working hours and wages, worker safety, and migrant worker accommodation, with the expectation that requirements are cascaded to next-tier suppliers.
- Supplier assessments: Nordic continued its risk-based supplier assessment program across multiple tiers, drawing on RBA audits, third-party ESG ratings, and the Nordic HRDD questionnaire. Assessment outputs informed supplier management routines; where non-conformances are identified, corrective action plans are initiated and tracked to closure.

- Stakeholder engagement: Nordic maintained engagement with industry peers and regulatory bodies, including through RBA membership and participation in related forums.
- Procurement practices: Nordic recognizes that its own commercial practices—including order predictability, lead times, and pricing—may affect the conditions under which suppliers and their workers operate. Nordic considered these topics as part of its ongoing HRDD discussions with relevant procurement and supply chain functions, including the potential human rights implications of order predictability. Nordic expects to continue evaluating these considerations as part of its HRDD development work in 2026.

Targeted measures by risk area

Own workforce

Equal treatment and opportunities

Nordic conducted an equal opportunity analysis to assess representation and identify potential structural barriers across demographic groups with a primary focus on gender representation. Inclusive recruitment practices were maintained, and efforts to attract and develop female talent continued, including through cooperation with external women's networks. An internal women's network was established to connect women across the organization.

Access to learning and development

Nordic introduced a blended onboarding program for new managers across its global operations and expanded its internal e-learning course portfolio. Training administration and reporting systems were centralized to improve visibility and equitable access. Leadership development programs for managers at different career stages are under development for further rollout.

Workload and well-being

Nordic transitioned from an annual engagement survey to quarterly pulse surveys, enabling more frequent monitoring of employee sentiment and earlier identification of workload concerns. Desk-based health risks are monitored through Nordic's health and safety management system, with employee feedback channels supporting early identification of workload concerns.

Upstream supply chain (Tier 2+ suppliers and raw materials)

Working conditions and labor rights

Nordic reviewed third-party supplier sustainability assessments, including RBA VAP results and ESG rating outputs, with attention to indicators of child labor and forced labor in upstream and Tier-2+ suppliers. Where findings warranted further action, expectations were communicated to the relevant Tier-1 supplier as the company's primary point of leverage. Nordic acknowledges that its direct influence on Tier-2+ practices is limited.

Occupational health and safety

Nordic maintained active RMI membership and reviewed smelter HSE-conformance status through RMI tools. 78% of relevant manufacturing partners held RMI membership during 2025, with continued encouragement for the remaining partners to obtain membership where applicable. 100% CMRT reporting coverage was maintained for standard products.

Tier 1 suppliers (including logistics providers)

Equal opportunities and representation

Nordic conducted high-level screening of Tier-1 suppliers and held targeted dialogues on observed patterns of gender-segregated roles. Gender-related indicators were incorporated into the supplier assessment framework. These steps support monitoring and supplier engagement; outcome-level metrics on representation at supplier facilities have not yet been established.

Occupational health and safety

Health and safety conditions at Tier-1 supplier facilities were monitored through RBA Self-Assessment Questionnaires and RBA Validated Assessment Program audits. Where audit findings identified non-conformances, supplier corrective action plans were tracked through Nordic's supplier management routines until closure.

Migrant worker vulnerabilities

Nordic assessed migrant worker recruitment and accommodation practices at Tier-1 suppliers through targeted sections of the HRDD questionnaire. Where risks or non-conformances are identified, corrective action tracking is initiated and reviewed through supplier management routines.

Working conditions in logistics operations

Nordic communicated labor-rights expectations to logistics providers and included relevant labor and safety indicators in supplier reviews. The Supplier Code of Conduct was distributed to key logistics partners in 2025.

Visibility into the working conditions of outsourced transport workers, including drivers, remains limited. The Supplier Code of Conduct distribution and HRDD questionnaire are the primary mechanisms for communicating labor-rights expectations to logistics providers, with the inherent limits of indirect oversight acknowledged under Section 5b.

Planned measures and areas of focus

Nordic will continue to develop and implement its HRDD program in 2026, with a focus on the following areas:

Own workforce

Nordic plans to further formalize its approach to training and skill development in 2026, creating more structured growth opportunities and expanding leadership development programs for managers at different career stages. Nordic will also continue to progress its work on representation and equal opportunities, informed by the Equal Opportunity Analysis completed in 2025, with a long-term aim of increasing the number of women in senior leadership roles.

Value chain

Nordic will continue its risk-based supplier assessment program, including expansion of ESG supplier rating coverage across the Tier-I supplier base. Corrective action follow-up for identified non-conformances will continue through established supplier management routines. Nordic will continue to communicate labor rights expectations to logistics providers through the Supplier Code of Conduct and HRDD questionnaire processes.

Nordic continues to consider how accessibility of grievance mechanisms for value chain workers might be improved over time. This remains a longer-term area of HRDD development.

Cross-cutting

Nordic will continue to develop human rights key performance indicators and tracking methods to strengthen the ability to measure the effectiveness of its HRDD actions over time. The annual HRDD cycle, including risk assessment, stakeholder engagement, and reporting, will be maintained in accordance with the Norwegian Transparency Act.

The following table summarizes the key measures by risk area:

Risk area	Key measures
Own workforce	Inclusive recruitment, learning and development, employee well-being monitoring
Upstream supply chain (Tier 2+)	Conflict minerals due diligence, supplier engagement
Tier 1 suppliers	Supplier assessments, corrective actions, engagement on labor standards
Logistics	Supplier requirements and engagement

Results and ongoing challenges

During the reporting period, Nordic implemented measures across its operations and value chain through established processes. Nordic maintained full coverage of conflict minerals reporting for standard products and met its target for Responsible Minerals Initiative (RMI) membership among relevant manufacturing partners. Where non-conformances were identified through supplier assessments, corrective actions were initiated and monitored through established processes.

Nordic recognizes that challenges remain, including:

- Limited visibility and leverage in upstream tiers: As a fabless company with an outsourced manufacturing model, Nordic's direct influence diminishes in deeper supply chain tiers, particularly in raw material extraction and processing.
- Visibility into logistics working conditions: The outsourcing of transport activities by logistics providers continues to limit direct oversight of driver working hours and conditions.
- Limited market leverage: As a relatively small customer to certain key suppliers, Nordic's ability to influence practices through commercial relationships may be constrained.
- Evolving grievance mechanism access: Improving direct access to grievance mechanisms for workers in the value chain remains a longer-term objective.

Nordic will continue to report transparently on both progress and challenges in future statements.

Accessibility of This Statement

This statement is published on Nordic's website at:

- <https://www.nordicsemi.com/Corporate-Social-Responsibility/Policies-and-Statements>.

It is also referenced in the Annual Report 2025 and is available in both Norwegian and English.

In accordance with the Norwegian Transparency Act, this statement is updated annually by 30 June, or earlier if significant changes occur in the Group's risk assessments. The current statement covers the period from 1 January to 31 December 2025.

Nordic aims to provide transparent reporting in line with its legal obligations under the Transparency Act, while taking into account the need to protect commercially sensitive information.

Stakeholders may submit written inquiries regarding how Nordic addresses actual and potential human rights impacts in its operations and value chain through the following channels:

Inquiry language	Submission link
English	https://nordicsemiconductor.integrityline.com/wb/133549986?lang=en
Norwegian	https://nordicsemiconductor.integrityline.com/wb/133549986?lang=no

Nordic will respond to such inquiries within three weeks of receipt, in accordance with the Norwegian Transparency Act.

For printed or PDF versions of this statement, the above URLs are provided in full. Clickable links are available in the online version.

Signature Section

This statement has been signed in accordance with the rules in Section 3-5 of the Norwegian Accounting Act.

We confirm that the information provided in this statement accurately reflects Nordic's human rights due diligence activities for the reporting period.

Oslo, 11 June 2026



Lars Aa. Løddesøl
Board member



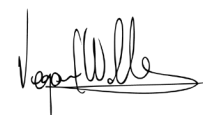
Dieter May
Chair



Annastiina Hintsa
Board member



Dr. Helmut Gassel
Board member



Vegard Wollan
Chief Executive Officer



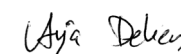
Inger Berg Ørstavik
Board member



Jon Helge Nistad
Board member, employee-elected



Bjørn Amstrup Spockeli
Board member, employee-elected



Anja Dekens
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