

NORSK TITANIUM AS

TRANSPARENCY ACT STATEMENT

PURSUANT TO THE NORWEGIAN TRANSPARENCY ACT

About Norsk Titanium

Norsk Titanium AS and its subsidiaries (herein referred to as “NTi,” “we,” “us,” or “our”), is a global leader in metal 3D printing. Utilizing our proprietary Rapid Plasma Deposition® (RPD®) technology, we provide cost-efficient 3D printing of metal alloys to deliver near-net shapes to customers in the commercial aerospace, defense and industrial markets.

NTi is headquartered in Oslo, Norway, with our research and development facility in Eggemoen, Hønefoss, Norway and our manufacturing operations in Plattsburgh, New York, USA. We employ over 100 people between these two locations.

Our Commitment

We strongly believe that our success is dependent on our reputation for operating with the highest standards for integrity, transparency and trust. NTi supports the UN’s Global Compact initiative and is actively committed to promoting the basic principles relating to the topics of human rights, labour standards, the environment and anti-corruption. To ensure that all directors, officers, employees, and suppliers of goods and services to NTi are aware of our commitment to ethical business practices, we adopted a Code of Ethics and Business Conduct (the “Code”), which is compatible with the UN Global Compact and the OECD’s Guidelines for Multinational Enterprises. The Code sets out our expectations for behaviour for our Board of Directors, management, employees, and contractors. Among other things, the Code requires that we comply with all applicable laws and regulations in any country in which we do business.

NTi Supply Chain

NTi’s suppliers play an important role in the success of our organization. We work with more than 1,000 suppliers who provide raw materials, goods and services, driving risk management and quality performance throughout the supply chain. NTi requires that each of our suppliers comply with all applicable laws, rulings and regulations in the jurisdictions where they do business. That includes laws related to equal opportunity and non-discrimination, and laws prohibiting human trafficking and slavery. NTi employees are encouraged to report to management if they suspect that any supplier is engaging in unethical behavior. If NTi verifies that any supplier is in violation of applicable laws, NTi has the right to terminate the agreement with the supplier.

Our Supplier Code of Conduct, which is applicable to all NTi supplier contracts and orders, bans the use of child labor, forced labor and human trafficking by our supply chain. NTi employs supplier selection, supplier qualification, and sustainability management processes which require key suppliers to disclose details about their own policies and procedures to prevent and detect modern slavery and human trafficking. NTi is committed to enforcing and expanding its disclosure requirements with suppliers as part of its ongoing supplier management programs.

Due Diligence Process

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify, assess and monitor potential risk areas in our supply chain, including periodic supplier audits.
- Mitigate the risk of slavery and human trafficking occurring in our supply chain.
- Protect whistle blowers.

Suppliers are categorized by the type of product or service they provide. Suppliers of critical goods and services undergo a rigorous qualification procedure and regular verification audits. NTi uses a third party service provider to conduct these assessments and document the results.

Training, Awareness and Reporting

Our internal policies and procedures aim to ensure that our employees understand and comply with all laws, rulings, and regulations in their area of business. We provide training to all employees to enable them to recognize and address any issues that may arise relating to slavery and human trafficking that may occur in our supply chain.

Employees are encouraged to seek guidance when they have questions or concerns regarding our policies and procedures through our EthicsPoint hotline and with NTi management. Employees may also use this channel to report any concerns or suspicions related to company or supplier actions. The EthicsPoint hotline is also available to employees of our supply chain and other third parties to raise issues or concerns to the NTi global compliance team regarding various compliance issues, including those involving modern slavery and human trafficking.

Finding of Adverse Impact

In the event of a finding of adverse impact through our due diligence process, NTi will fulfill its legal obligations to publish the findings and the measures taken to address the adverse impact. To date, our due diligence processes have not identified any situations with actual or potential negative consequences for basic human rights and decent working conditions.

In accordance with the Norwegian Transparency Act, NTi will provide information about our efforts to promote labour and human rights in our supply chain to anyone who requests this information. Inquiries may be made to transparency@norsktitanium.com.

Carl Johnson
Chief Executive Officer and President
Norsk Titanium AS
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