

Nevion's Norwegian Transparency Act statement 2024

The Norwegian Transparency Act, which is based on OECD guidelines, aims to promote respect for fundamental human rights and decent working conditions within organizations, while also ensuring public access to information. The work related to the Transparency Act is anchored within the board of directors, and the company has initiated a process to develop internal guidelines and due diligence assessments of its own operations, business partners, and supply chains.

This report encompasses the period from January 1st – December 31st, 2024.

Nevion's business structure and operations

The Nevion group consists of the parent company Nevion AS (Norway) with the wholly owned subsidiaries Nevion Sp.z o.o. (Poland), Nevion Ltd (United Kingdom), and Nevion Asia Pte Ltd (Singapore)

The Nevion Group's business concept is to develop, market, sell and deliver competitive and technologically innovative projects, products, and services in professional media transport to the international broadcasting and telecommunications market. The main customers are broadcasters, telco's, telecommunications service providers and governments, worldwide.

Nevion AS has been established in 1996 and the current headquarter is in Lysaker, Norway. Nevion has been acquired by Sony in 2020 and is a Sony Group Company since then.

Human rights due diligence process

Nevion is committed to respecting internationally recognized human and labour rights, both within our own operations and across our entire value chain.

To fulfil this commitment, we have reviewed our internal procedures to ensure that we adhere to the OECD's guidelines for conducting diligent evaluations in responsible business practices. This process involves identifying, assessing, preventing, and mitigating human rights risks throughout the entire value chain of the business.

Information about the Transparency act is available to all employees on the intranet.

Nevion is ISO 9001, 14001 and 27001 certified. The certificates are available on our web page.

Nevion adheres to [Sony Group Code of Conduct](#), which provides a set of principles to guide us, as we engage in our day-to-day roles to pursue our Purpose in alignment with our Values.

In Nevion's supply chain we requires that our suppliers and contractors align with [Sony Supply Chain Code of Conduct](#) - Sony's ethical principles. All the selected Nevion Vendors must adhere the relevant policies regarding legal compliance, respect for human rights, equitable labour and employment practices, environmental preservation, and product and service safety.

The company has a Compliance & Ethics Hotline which can be contacted by employees to raise concerns or to seek guidance regarding possible violation of the law or our policies.

Risk assessment

Our standard procedures include evaluating our vendors and countries of origin to assess the value chain and identify areas of potential high risk. We have carried out an overall screening of all suppliers based on certain categories such as geography and expenditure and have arrived at a prioritized list of the suppliers we believe are most at risk.

We consider hardware and ICT products to be the most significant concern regarding potential breaches on human rights and fair labour conditions. Consequently, we have placed emphasis on monitoring and addressing the practices of our major suppliers and distributors in this sector.

We have identified vendors that pose the highest level of risk and have conducted screenings using World-Check. This platform provides information to assist businesses in meeting regulatory requirements and detecting potential financial crimes.

We maintain regular communication and monitoring of our suppliers through supplier screening in connection with entering contracts. To uphold our commitments, Nevion relies on close collaboration with suppliers who commit to following our guidelines, and in turn, require the same from their own suppliers. This way, the guidelines will impact businesses further down the value chain. If the supplier is not willing to handle damage or risk, it may be necessary to terminate the relationship with the supplier. Ending a supplier relationship will always be a last resort, only after attempts at collaboration for improvements have been made.

We evaluate potential new suppliers to ensure alignment with our standards. This evaluation includes a thorough check against the Sanctions List Search available on the U.S. Treasury's website (treas.gov) to confirm that these entities are not subject to any trade restrictions or financial sanctions. We select new suppliers with utmost care, conducting comprehensive assessments that include reviewing the supplier's reliability, transparency, and operational metrics.

To ensure the health and safety of workers involved in the supply chain of Nevion's products, the company is following a RoHS (Restrictions of Hazardous Substances) and REACH (registration, evaluation, authorisation, and restriction of chemicals) requirements as well as US TSCA (The Toxic Substance Control Act). The primary objective of this is to protect both workers and the environment from the potential risks associated with the use of hazardous chemicals. Nevion also follows Sony's green partner program, which aims to ensure that the suppliers and business partners meet certain environmental standards and requirements.

Through our continuous risk assessment, we have not determined any actual violations. The key area for improvement remains in enhancing awareness among employees and management about the governance processes related to human rights. Increased awareness will enhance our capacity to effectively address risks both within and outside the organization. We conduct and review this process on an annual basis.

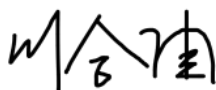
If you have any questions, please contact Nevion at sustainability@nevision.com.

The Board of Directors Nevion AS

Lysaker June 26th, 2025



Masakazu Murata
Director (Chairman)



Jun Kawai
Board member



Monika Karacsony
Board member



Ragna Margrethe Agerup
Board member



Arne-Johan Martinsen
Board member