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Human Rights

Transparency Act Report 2026



Reporting period: June 2025 – June 2026

About this report

The Norwegian Transparency Act requires companies to conduct human rights due diligence and publicly report how they identify and address actual and potential impacts on people and working conditions throughout their operations and supply chains.

This report outlines how Neat identifies, assesses, and addresses human rights risks across our operations and value chain.

It summarizes our due diligence activities, findings, and priorities during the reporting period and fulfills our obligations under the Transparency Act.

Neat's approach is informed by internationally recognized frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.



Human rights and responsible business conduct

Neat is committed to conducting business responsibly and respecting internationally recognized human rights throughout its operations and value chain. Our approach is guided by the Norwegian Transparency Act, the UN Guiding Principles on Business and Human Rights (UNGPs), and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

The Transparency Act requires companies to identify, assess, prevent, and address actual and potential adverse impacts on fundamental human rights and decent working conditions. It also gives the public the right to request information about how companies manage these risks.

At Neat, human rights considerations are embedded throughout our operations, supplier relationships, and decision-making. We work with suppliers and business partners who share our commitment to ethical business conduct and responsible labor practices, and we regularly assess potential risks across our value chain.

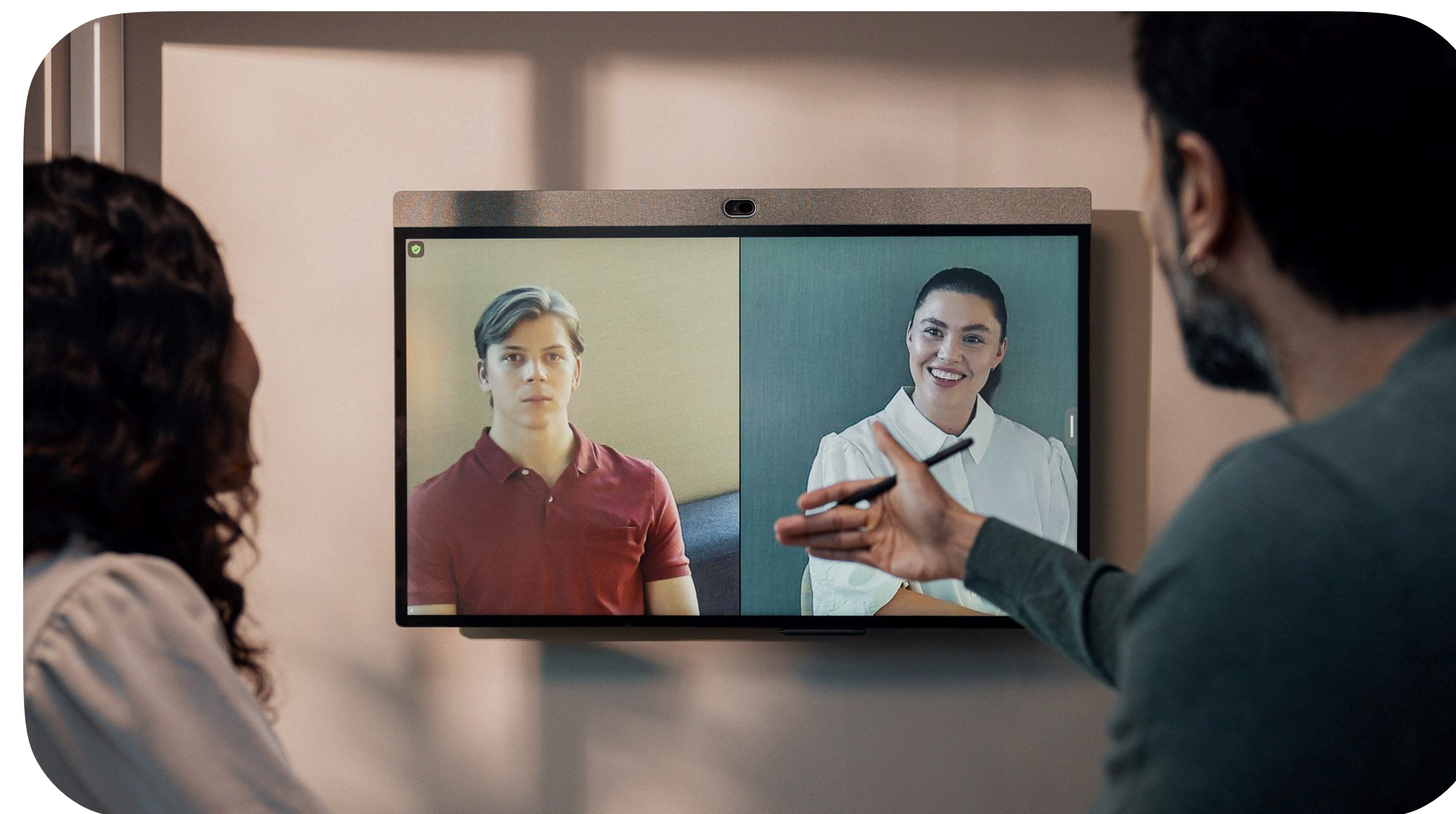
Our commitments

- Respect fundamental human rights and decent working conditions throughout our operations and value chain.
- Conduct risk-based due diligence in line with the requirements of the Norwegian Transparency Act.
- Work proactively to prevent and mitigate adverse impacts on people and working conditions.

- Promote transparency and accountability in our relationships with suppliers and business partners.
- Provide stakeholders with information about our due diligence efforts and findings.
- Provide access to information upon request.

Under the Norwegian Transparency Act, anyone may request information about how Neat addresses actual and potential impacts on human rights and decent working conditions. Requests can be submitted to transparency@neat.no.

Neat reviews and responds to requests in accordance with the requirements and timelines established by the Transparency Act.



About Neat

A global video technology company.

Neat designs and develops video collaboration devices and experiences for hybrid work. Founded in Oslo, Norway, Neat serves customers globally through a network of employees, suppliers, manufacturing partners, and distributors.

As a company operating across international markets and supply chains, Neat recognizes its responsibility to respect human rights and promote responsible business conduct throughout its operations and value chain.

This report focuses on Neat's approach to human rights due diligence, including how we identify, assess, and address impacts on people and working conditions in accordance with the Norwegian Transparency Act.



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Neat at a Glance

2019

Founded



Oslo, Norway

Headquarters



500+

Employees



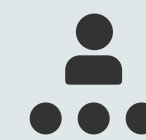
90+

Countries



45

Distribution partners



4

Development partners



2026

2026 Transparency Act: Key Findings

338 suppliers assessed, enhanced due diligence, and continued efforts to identify and mitigate human rights risks across our value chain.

Neat continued to strengthen its Transparency Act governance framework during its second full year of reporting. Building on the foundation established in 2025, the 2026 reporting period expanded supplier coverage from 195 to 338 assessed suppliers, increased engagement with key suppliers and business partners, and introduced a two-stage risk assessment methodology aligned with OECD due diligence principles.

These efforts strengthened our ability to identify, assess, and prioritize human rights and labor-related risks across our value chain and informed ongoing due diligence activities.



2026 Goals, Results and Findings

During the 2026 reporting period, Neat continued to strengthen its human rights due diligence program by expanding supplier assessments, improving risk methodologies, increasing supplier engagement, and strengthening internal governance and training.

Key Results at Glance

338

Suppliers assessed
(up from 195 in 2025)

12.4%

Medium-high risk suppliers
(target: below 35%)

2.7%

High-risk suppliers
(target: below 5%)

100%

Development Partners signed Supplier Code of
Conduct

91%+

Training completion rate

Goals	Status	Target	Key actions	Key findings
1. Supplier Mapping and Risk Assessment	Complete	Expand supplier mapping and assessments across Tier 1–3 suppliers focusing on "important suppliers".	<ul style="list-style-type: none"> Assessed 338 suppliers Expanded coverage to Norwegian suppliers Continued supply chain mapping 	<ul style="list-style-type: none"> 70% increase in number of suppliers assessed Better understanding of multi-tier relationships Additional traceability work remains
2. Development Partner Assessments	Deferred	Conduct on-site assessments of key manufacturing partners.	<ul style="list-style-type: none"> Assessment framework prepared Alternative reviews completed Facility transition monitored 	<ul style="list-style-type: none"> Site assessments postponed due to factory relocation New assessments planned once facility is operational
3. Health, Safety and Workplace Screening	Complete	Strengthen workplace health and safety governance.	<ul style="list-style-type: none"> HSE reviews completed globally (Oslo, Tokyo, London, Cambridge) HSE teams established First-aid training delivered 	<ul style="list-style-type: none"> Low workplace-related human rights risk identified Consistent HSE framework established globally
4. Code of Conduct Adoption	80% Complete	Increase Supplier Code of Conduct adoption.	<ul style="list-style-type: none"> 100% adoption among development partners Supplier engagement channels established CoC integrated into supplier onboarding 	<ul style="list-style-type: none"> Strong adoption among strategic suppliers Additional follow-up with 2 high-risk second-tier suppliers.

Goals	Status	Target	Key actions	Key findings
5. Reduce Medium-High Risk Suppliers	Complete	Reduce medium-high-risk suppliers to below 35% of the assessed supplier base.	<ul style="list-style-type: none"> • Implemented enhanced documentation requirements for medium-high risk suppliers • Issued corrective action plans to suppliers above threshold with structured follow-up 	<ul style="list-style-type: none"> • Target achieved • Assessment accuracy increased by 12.4% • Enhanced supplier documentation requirements implemented
6. Reduce High-Risk Suppliers	Complete	Reduce high- and very-high-risk suppliers to below 5% of the assessed supplier base.	<ul style="list-style-type: none"> • ESG documentation and CoC sign-off requested • Remaining high-risk suppliers actively monitored 	<ul style="list-style-type: none"> • Target achieved • Enhanced due diligence increased by 3.3% • Three suppliers remain under active follow-up
7. Human Rights and Anti-Bribery Training	Complete	Strengthen awareness of responsible business conduct through human rights and anti-bribery training.	<ul style="list-style-type: none"> • Human Rights training delivered • Anti-Bribery training delivered • Annual training cycle established 	<ul style="list-style-type: none"> • Strong participation and completion rates • Training program to expand in 2027

Supply Chain Risk Methodology

Our approach to identifying, assessing, and managing human rights risks across the value chain.

Stakeholder engagement

Stakeholder engagement is an important part of Neat's human rights due diligence process. Input from employees, suppliers, customers, business partners, and industry organizations helps identify potential risks, understand stakeholder expectations, and prioritize areas for further assessment and action.

During the reporting period, Neat engaged with internal stakeholders across procurement, legal, finance, supply chain, sustainability, product, and leadership functions. External engagement included suppliers, manufacturing partners, customers, industry associations, and other relevant stakeholders.

Insights gathered through interviews, workshops, supplier dialogue, and industry engagement informed our risk assessments and helped shape our approach to human rights, labor practices, and responsible business conduct across our value chain.



Supply chain risk mapping

Neat conducts supply chain risk mapping as part of its human rights due diligence process. The objective is to identify, assess, and prioritize actual and potential impacts on human rights and decent working conditions across our value chain.

Our approach follows the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the OECD Due Diligence Guidance for Responsible Business Conduct. Supplier assessments begin with information gathering through supplier questionnaires, self-assessments, stakeholder engagement, and internal review.

To assess risk, Neat considers country-, sector-, and supplier-specific factors using internationally recognized sources and risk indicators. Information from suppliers and stakeholders is combined with external data to identify areas requiring enhanced due diligence and further engagement.

The results of this process help prioritize risk mitigation activities, supplier engagement, and ongoing monitoring efforts throughout the reporting period.

Human Rights Due Diligence Process



Adapted from the OECD Due Diligence Guidance for Responsible Business Conduct.

2026 methodology update: enhanced supplier risk assessment

During the 2026 reporting period, Neat introduced an enhanced two-stage supplier risk assessment methodology to strengthen due diligence and improve risk prioritization.

The first stage combines country, sector, and supplier-level risk indicators with information provided through supplier documentation and self-assessments. The second stage applies additional review criteria to suppliers identified as medium-high, high, or very-high risk, as well as strategic manufacturing partners.

The methodology incorporates factors such as supplier policies, Code of Conduct adoption, audit results, and other due diligence findings. This approach provides a more comprehensive view of supplier risk, supports targeted engagement, and improves consistency in year-on-year risk assessments.

The methodology is aligned with OECD due diligence guidance and forms part of Neat's ongoing efforts to identify, assess, and address potential human rights and labor-related risks across the value chain.



Supplier Categories

To support risk-based due diligence, Neat groups suppliers and business partners according to their relationship to the company and their role in the value chain.

1

Development and manufacturing partners

Strategic partners responsible for product development and manufacturing activities.

2

Important suppliers

Suppliers providing critical components, materials, or services essential to Neat products and operations.

3

Suppliers and business partners

Organizations providing products, services, or operational support across Neat's operations.

Supply Chain Tiers

Risk assessments are conducted using a risk-based approach that considers supplier category, geographic location, industry sector, and other relevant risk indicators. Higher-risk suppliers may be subject to enhanced due diligence measures, including additional information requests, audits, or corrective action plans.

Tier 1

Direct suppliers and business partners with a contractual relationship with Neat.

Tier 2

Suppliers to Tier 1 partners.

Tier 3

Suppliers further upstream in the supply chain.

Human Rights Risks Across the Technology Sector Value Chain

Neat recognizes that human rights risks can arise at different stages of the technology value chain, from raw material extraction and component manufacturing to product use and end-of-life recycling. The risks shown below reflect commonly identified sector-level risks based on international guidance, industry research, and publicly available sources. They help inform Neat's risk assessments and due diligence activities but do not necessarily represent risks identified within Neat's own operations or supplier relationships.

Raw material extraction

- Child labor
- Forced labor
- Unsafe working conditions
- Environmental impacts

Component manufacturing

- Excessive working hours
- Wage and labor rights issues
- Hazardous substance exposure
- Restrictions on freedom of association

Final assembly

- Excessive working hours
- Workplace health and safety concerns
- Freedom of association risks

Distribution and retail

- Warehouse labor conditions
- Temporary and contract worker protections

Consumer use

- Privacy and data protection
- Digital rights risks

End-of-life (e-waste)

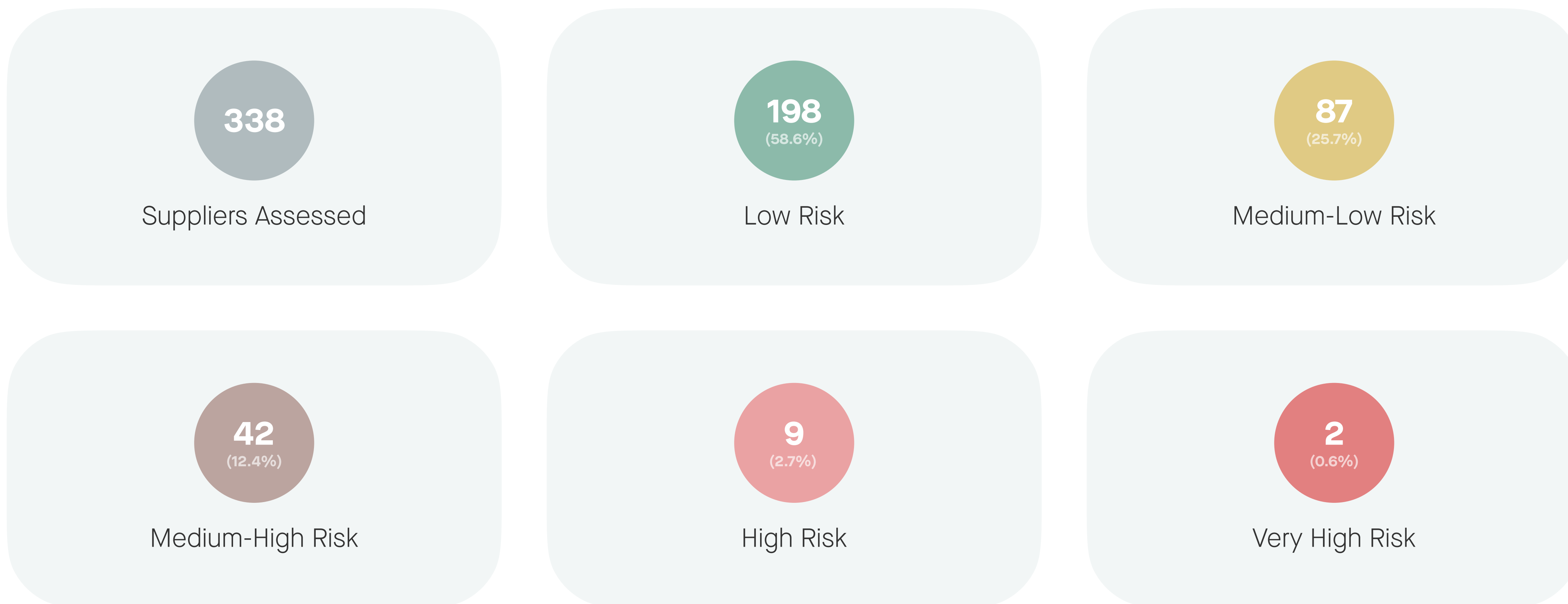
- Informal recycling practices
- Hazardous material exposure
- Child labor risks

Supplier Human Rights Risk Assessment

Assessing supplier human rights risks using country, sector, and supplier-specific factors.

June 2026: Supplier Risk Assessment Results

Of the 338 suppliers assessed, 84.3% were classified as low or medium-low risk. Eleven suppliers (3.3%) were identified as high- or very-high-risk and remain subject to enhanced due diligence and ongoing follow-up.



Medium-high risk suppliers reduced to 12.4%

During the 2026 reporting period, Neat achieved its objective of reducing medium-high risk suppliers to below 35% of the assessed supplier base.

Of the 338 suppliers assessed, 42 (12.4%) were classified as medium-high risk, significantly below the target threshold and a substantial improvement from 2025, when 31.8% of assessed suppliers fell within this category.

This result reflects continued supplier engagement, strengthened due diligence activities, and the introduction of an enhanced two-stage risk assessment methodology. Enhanced documentation requirements, implementation of the Supplier Code of Conduct, and expanded risk screening contributed to more effective risk identification and prioritization.



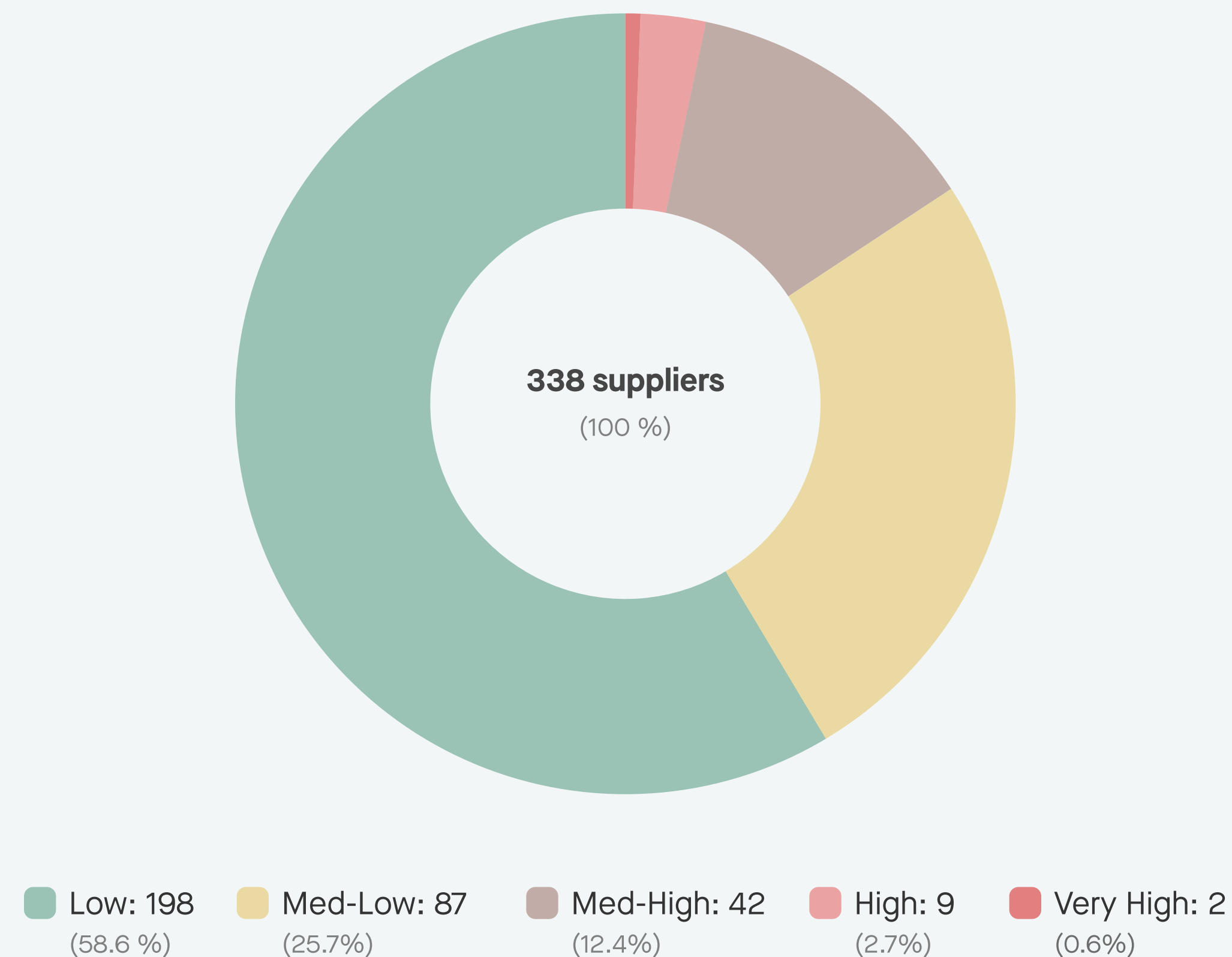
Key findings:

- Target achieved: Medium-High Risk suppliers reduced to 12.4%, significantly below the 35% target.
- The supplier risk profile remained predominantly low risk, with a limited proportion requiring enhanced due diligence.
- Enhanced risk assessment methodology strengthened risk identification and prioritization.
- Additional due diligence measures were implemented for suppliers identified as higher risk.
- Supplier engagement and documentation requirements were strengthened across the value chain.

Key takeaways:

- 84.3% of assessed suppliers were classified as Low or Medium-Low Risk, while 15.7% required enhanced due diligence.
- 12.4% of suppliers (42) were identified as Medium-High Risk and will be encouraged to sign the Code of Conduct, submit ESG action plans, and pursue third-party audits (ISO 14001, SMETA).
- Enhanced risk assessment methodology and supplier engagement strengthened risk identification and prioritization.

Risk distribution 2026



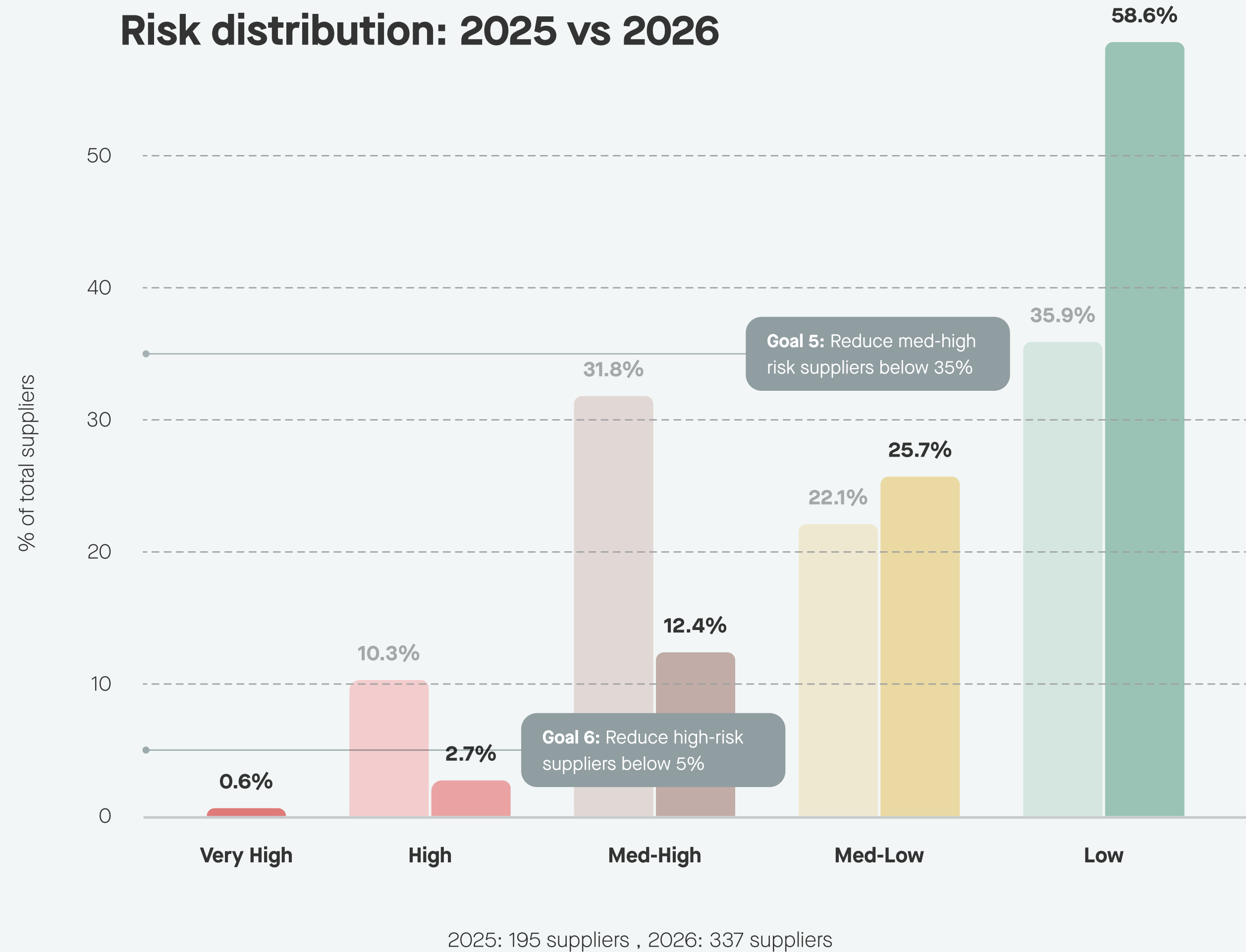
Goal achieved: High and very high risk suppliers reduced to 3.3%

During the 2026 reporting period, Neat achieved its objective of reducing the proportion of suppliers classified as high or very high Risk.

Of the 338 suppliers assessed, 11 suppliers (3.3%) were classified as high or very high risk, meeting the target and representing a significant reduction compared with 2025, when 10.3% of assessed suppliers were classified as high risk, and no separate very high risk category was used.

This improvement reflects strengthened due diligence processes, expanded supplier engagement, implementation of the Supplier Code of Conduct, and the introduction of a two-round risk assessment methodology. Enhanced review of supplier documentation and increased follow-up with higher-risk suppliers contributed to improved risk management and oversight.

Risk distribution: 2025 vs 2026



Key findings:

- **Target achieved:** High and very-high risk suppliers reduced to 3.3%, below the 5% target.
- Only **11 of 338 assessed suppliers** were classified as high or very-high risk.
- High risk suppliers accounted for **2.7%** of the assessed supplier base.
- Very high risk suppliers accounted for **0.6%** of the assessed supplier base.
- Enhanced due diligence measures were applied to suppliers identified as higher risk, including additional documentation requests and targeted engagement.
- The updated risk assessment methodology improved consistency and transparency in supplier risk classification.

Comparison with 2025

Category	2025	2026
High and Very High Risk	10.3%	3.3%
Medium-High Risk	31.8%	12.4%
Suppliers Assessed	195	338

Key takeaways

The proportion of suppliers requiring the highest level of due diligence decreased substantially despite a significant increase in assessment coverage. This indicates improved visibility into supplier risks, stronger supplier engagement, and more effective risk management processes across Neat's supply chain.

Supplier risk assessment results and key findings

Neat achieved both supplier risk reduction targets established for the 2026 reporting period. High and very-high risk suppliers represented 3.3% of the assessed supplier base, below the 5% target established in Goal 6. Medium-high risk suppliers represented 12.4% of suppliers assessed, significantly below the 35% threshold established in Goal 5.

All high-risk supplier categories (15.7%, 53 suppliers)

- Very High Risk (0.6%, 2 suppliers)
Immediate corrective action and direct supplier engagement required.
- High Risk (2.7%, 9 suppliers)
Enhanced due diligence and targeted follow-up measures implemented.
- Medium-High Risk (12.4%, 42 suppliers)
Supplier Code of Conduct sign-off, improvement plans, and additional assessments required.

Low and Medium-Low Risk (83.3%, 285 suppliers)

- Monitoring and improvement recommendations provided where relevant. Low Risk (58.6%, 198 suppliers)
- No significant human rights concerns identified through the assessment process.

Methodology note: The 2026 assessment introduced a five-tier risk model, including a new "Very High Risk" category. As a result, year-on-year comparisons should be interpreted with consideration of the updated methodology.

Supplier risk profile comparison: 2025 vs. 2026

Risk level	2025 - count	2025 - %	2026 - count	2026 - %
Very High	—	—	2	0.6%
High	20	10.3%	9	2.7%
Med-High	62	31.8%	42	12.4%
Med-Low	43	22.1%	87	25.7%
Low	70	35.9%	198	58.6%
Total	195	100%	338	100%

Note: 2025 assessment did not use a "Very High" category. The 2026 methodology introduced a five-tier scoring model. Percentage comparisons should be interpreted with this context in mind.

Follow-Up Measures by Risk Category

■ High and very-high-risk suppliers (11 suppliers)

Suppliers classified as high or very-high risk are subject to enhanced due diligence and targeted engagement.

Measures include:

- Direct engagement with suppliers and development partners.
- Requests for additional documentation related to human rights, labor practices, environmental management, and governance.
- Corrective Action Plans (CAPs) where risks or gaps are identified.
- Ongoing monitoring and follow-up until identified issues are addressed.
- Consideration of third-party audits or site assessments where appropriate.

■ Medium-high-risk suppliers (42 suppliers)

Suppliers in the medium-high risk category require additional assessment and monitoring to verify alignment with Neat's expectations.

Measures include:

- Supplier Code of Conduct sign-off.
- Review of relevant policies and supporting documentation.
- Encouragement of independent audits or self assessment programs.
- Continued dialogue and periodic reassessment.

Low and medium-low risk suppliers (285 suppliers)

Suppliers assessed as low or medium-low risk remain subject to standard monitoring procedures.

Measures include:

- Periodic reassessment through Neat's supplier risk process.
- Ongoing communication of ESG and responsible business conduct expectations.
- Documentation updates where required.
- Escalation to enhanced due diligence if risk indicators change.

Key takeaway

The proportion of suppliers requiring the highest level of due diligence decreased substantially despite a significant increase in assessment coverage. This indicates improved visibility into supplier risks, stronger supplier engagement, and more effective risk management processes across Neat's supply chain.



Policies and Governance

The policies and governance structures that support Neat's human rights due diligence and responsible business conduct program.

Policies and governance framework

This section summarizes the key policies, standards, and governance documents that support Neat's human rights due diligence process and responsible business conduct framework. These policies establish expectations for employees, suppliers, development partners, and other business partners across Neat's operations and value chain.

The policies summarized in this section include the Human Rights Policy, Supplier Code of Conduct, Anti-Bribery and Corruption Policy, Data Privacy Policy, Whistleblower Policy, and other governance documents relevant to compliance with the Norwegian Transparency Act.



Policies Supporting Responsible Business Conduct

Neat's human rights due diligence program is supported by policies and governance documents that establish expectations for employees, suppliers, development partners, and other business partners. The policies below were in force during the 2026 reporting period.

Policy	Purpose	Status	Review or Update Year
Human Rights Policy	Defines Neat's commitment to respecting internationally recognized human rights and outlines the company's approach to human rights due diligence across its operations and value chain.	Active	2026
Supplier Code of Conduct	Establishes minimum expectations for suppliers relating to labor rights, working conditions, environmental responsibility, business ethics, and data privacy.	Active	2025
Anti-Bribery and Corruption Policy	Prohibits bribery and corruption in all forms across Neat's operations and business relationships. Includes whistleblower provisions and updated guidance aligned with current regulatory expectations. Reviewed and approved in 2026.	Active	2026
Data Privacy Policy	Governs the handling of personal data in compliance with GDPR and applicable regulations. Updated in 2026 to reflect evolving data protection requirements and supplier data management obligations.	Active	2026
Whistleblower Policy	Provides a safe channel for employees, partners and everyone in the value chain to report ethical concerns anonymously. To be reviewed in next reporting cycle.	Active	2025

Human Rights and Compliance Training: 2026

Neat conducted mandatory training and awareness activities during the 2026 reporting period to strengthen understanding of human rights due diligence, responsible business conduct, data protection, whistleblowing, and anti-corruption requirements. Relevant modules were delivered to employees across the organization, with selected training also extended to selected development partners.

Training module	Scope and content	Audience	Completion rate
Data Privacy and Security	Covers GDPR obligations, data handling requirements, security best practices, and Neat’s updated Data Privacy Policy. Includes case studies on data breaches and supplier data obligations.	All employees	93%
Human Rights Due Diligence	Introduction to the Transparency Act, Neat’s Human Rights Policy, supplier risk assessment methodology, and how to identify and report human rights concerns in the supply chain.	All employees and selected development partners	91%
Anti-Bribery and Corruption	Covers Neat’s Anti-Bribery and Corruption Policy, international anti-corruption requirements, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, risk recognition, and how to handle gifts, hospitality, and third-party relationships.	All employees and selected development partners	91%
Whistleblower Policy and Speak-Up Culture	Explains Neat’s whistleblower mechanism, how to report concerns safely and anonymously, protections for reporters, and the role of the compliance team.	All employees	No incident reported

Participation and completion rates remained high across all mandatory training modules. Additional training related to environmental sustainability and responsible procurement is planned for the 2027 reporting period.

2027 Goals

1

ESG on-site visits: Complete ESG audits at all JDM development partner manufacturing sites once new production facilities are fully operational.

2

Supplier Code of Conduct: Ensure all new manufacturers, key suppliers, and medium-/high-risk suppliers sign Neat's Supplier Code of Conduct.

3

Health and safety workplace screening: Maintain a consistent health, safety, and governance framework across all Neat locations through annual assessments and reviews.

4

Conflict-free materials and responsible sourcing: Implement a structured assessment of critical materials and suppliers to strengthen responsible sourcing practices.

5

Medium-high risk supplier screening: Maintain the proportion of medium-high-risk suppliers below 20%.

6

High-risk supplier screening: Maintain the proportion of high- and very-high-risk suppliers below 5%.



Conclusion: Advancing Transparency and Responsible Business Conduct

2026 was a year of meaningful progress for Neat’s human rights and supply chain transparency program. Building on the governance foundations established in 2025, we expanded our due diligence activities, assessing 338 active suppliers across Tiers 1, 2, and 3, introducing a refined risk classification methodology and achieving our core supply chain risk-reduction goals.

The results reflect the commitment of our teams and partners. Very High and High risk suppliers represented 3.3% of the assessed supplier base (11 suppliers), while Medium-High risk suppliers accounted for 12.4% (42 suppliers). Both figures were below established targets. All Development Partner manufacturers signed Neat’s Supplier Code of Conduct, internal training on human rights, anti-bribery, data privacy, and whistleblowing achieved a 91% completion rate, and no incidents were reported through the whistleblower mechanism.

At the same time, responsible business conduct requires continuous improvement. ESG site visits to Joint Development Manufacturing partners were deferred due to manufacturing site transitions, and higher-risk sub-suppliers require ongoing engagement through our Development Partners.

Neat believes transparency is more than a compliance requirement—it reflects our values and our commitment to responsible business conduct. We will continue strengthening our due diligence processes, deepening supplier engagement, and reporting openly on our progress as we work toward a more transparent, responsible, and resilient supply chain.

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Signed by:
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Chief Executive Officer

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Chief Product
and Transparency Officer

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James Weeks
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Board Member

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