

Norwegian Transparency Act Statement 2025

Introduction

This Statement has been prepared for Alcatel Submarine Networks Norway AS (“ASN Norway”) in accordance with the requirements of the Norwegian Transparency Act.

ASN Norway is a wholly owned subsidiaries of Alcatel Submarine Networks, a French simplified stock corporation (société par actions simplifiée) with a registered capital of € 112 013 478, having its registered office at 1 avenue du Canada, 91940 Les Ulis, France, registration number 389 534 256 RCS Evry (“ASN”). ASN is owned at 80% by the French Shareholding Agency (Agence des Participations de l’Etat, “APE”) and at 20% by Nokia (ASN’s former majority shareholder).

ASN is a global leader in the design, development, production, installation and maintenance of subsea optical fibre cable systems for customers in the telecommunications sector, including sensing systems.

Slavery, servitude, forced labour, and human trafficking remain global concerns, and no industry or company can be considered immune to the different forms of modern slavery. ASN does not tolerate, in any form or context, the use of servitude, forced or bonded labour, human trafficking, or other forms of modern slavery in both its own operations and any part of its global supply chain.

ASN’s commitment:

At ASN, our vision for all projects, is to make our customers and partners constantly trust ASN’s ability to think ahead, and to develop and implement subsea optical fibre cable systems throughout the world in a responsible and sustainable way. Since ASN has been in the subsea market for more than a century and intends to remain in the market in the long term, it has become clear that the company’s values should include the safety and security of people, respect for Human Rights, respect of the compliance and anti-corruption regulations and caring for the environment in a responsible way.

ASN is committed to the Human Rights principles and values laid out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and its related covenants), the International Labor Organization’s Declaration on Fundamental Principles (ILO) and Rights at Work, Organization for the Economic Co-operation and Development (OECD) guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

Also, social responsibility is fundamental in the operation of ASN. A review of our operations with respect to social responsibility has been performed and will be an ongoing effort as part of management responsibility.

ASN Norway

Enterprise structure of ASN Norway

ASN Norway is a Norwegian Company registered in Brønnøysundregistrene and 100 % owned by ASN France.

ASN Norway's area of operations

ASN Norway is a subcontractor to ASN in Engineering, Procurement, Construction, and Installation projects related to supply of optical sensor systems. These projects are based on fibre sensing technology developed and manufactured by ASN Norway.

The contribution of ASN Norway in these projects are engineering, manufacturing of sub-components, installation of system components on topside facilities, expert advice and supervision during installation of the subsea components, commissioning of the system and operation and maintenance of the systems during operation.

In the fibre sensing system ASN Norway is responsible for assembly and testing of the topside interrogation units and the Fibre Bragg Grating inside the sensing elements.

In the manufacture of Fibre Bragg Gratings ASN Norway buys optical fibre and write gratings in our clean room facility using employees of ASN Norway.

The operation and maintenance of the fibre sensing system is performed using employees of ASN Norway.

ASN Norway is also a subcontractor to ASN in France for the delivery of OptoDAS interrogator units. ASN Norway is responsible for assembly and test of these interrogators. Our material analysis and enterprise risk management procedures help identify potential supply chain risks, also for this product.

Location of operations

All operations related to manufacturing and engineering takes place at ASN Norway's facilities in Trondheim, Norway. Support on installation, commissioning, operation and maintenance can take place remotely from Trondheim or at customer's facilities.

Board of Directors and Management team

ASN Norway Board of Directors consist of members from ASN France, including CEO (president) of ASN France and General Manager of ASN Norway.

The management Team in ASN Norway consists of Managing Director in addition to Team managers from Industrial Operations, Research and Development, QHSE and Finance.

ASN Norway's commitments

Guidelines and procedures for handling potential adverse impacts on human rights and decent working conditions

The ASN Code of Conduct ([Ethics & Compliance – Alcatel Submarine Networks](#)) is the basis for all ASN's operations. This Code of Conduct sets high standards of integrity for all of its employees, officers, directors and business partners. The Code of Conduct describes in detail the way ASN's business leaders and employees are expected to behave in our relations with each other, our customers and our suppliers related to ethical standards and human rights. Once every year, all ASN employees around the world must complete a mandatory ethics and compliance course based on this code of conduct, and Human Rights trainings are provided to the ASN Norway team.

In addition to implementing ASN’s best-in-class programs in terms of ethics and compliance (including human rights), ASN has a CSR/Human Rights Governance Committee, whose duty is notably to ensure that ASN group of companies act with due diligence with Human Rights principles in its business activities.

ASN strives to have a good physical and psychosocial working environment. If objectionable circumstances are discovered in the company, the employees are encouraged to report it. This applies to both permanent and temporary employees (Norwegian Working Environment Act § 2A). The personnel handbook describes several ways/persons that could be used to report circumstances of concern and the protection of personnel notifying.

In addition to this local grievance mechanism ASN offers multiple channels for internal and external stakeholders to report potential ethical concerns or violations of the stated policies. A whistle-blower policy is in place, and an ethical line is available internally and externally to report concerns (ethics@asn.com). Our speak-up culture is designed to ensure that employees feel comfortable raising ethics and compliance, ESG concerns without fear of retaliation and in a confidential way.

Helpline information:

ASN Norway Personnel Handbook

Email: ethics@asn.com

Due diligence assessment and responsible sourcing:

ASN Norway is a Norwegian company with its activities governed and audited to conform to the Norwegian Working Environment Act. Related to fundamental human rights and decent working conditions we find that our main risk is thus related to our suppliers.

In 2025, ASN Norway conducted business with 256 suppliers, mainly based in Norway, UK, France, and Sweden. Overall, across ASN Norway, ASN Suppliers fall into the following types of activities and regions:

Commodity	2025
Cable	2
Electronics	17
Mechanics	44
Optical	50
IT & Software	32
Consultants & Professional services	40
Facility services	25
Logistics	13
Office supplies & Tools	14
Testing & Manufacturing equipment	10
Chemicals & Gases	5
Other	4
Total 2025	256

Region	2025
APAC	8
EMEA	234
NA	14
Total 2025	256

All suppliers to ASN must be approved prior to being entered in the ASN supplier base. Screening for compliance according to ASN standard operating procedures is mandatory for all supplier creation under a risk-based approach. The screening consists of reliability, compliance, ESG (Environment, human rights, social and governance) and financial viability. It is renewed in case

of major change in the supplier situation, potentially impacting his compliance position or the risk of the project. Otherwise, each supplier is subject to rescreening every three years as per the ASN corporate policy.

The due diligence is also applicable for any other third parties, such as distributors. This due diligence needs to have a positive output to enable ASN to enter into a contractual relationship.

An important part of the approval process is also that all suppliers in the ASN supplier base must acknowledge the ASN Third Party Code of Conduct ([Ethics & Compliance – Alcatel Submarine Networks](#)), the RBA (Responsible Business Alliance) Code of Conduct (<http://www.responsiblebusiness.org/code-of-conduct/>) and the

the ASN Supplier's Booklet on Human Rights entitled "Human Rights: an introduction to the topic and to ASN's expectations" available at: https://www.asn.com/wp-content/uploads/2026/01/ASN_Human_Rights_Guidance_for_Suppliers.pdf).

To demonstrate their commitment to respecting human rights and ethical business conduct, ASN expects its suppliers to apply the same standards to their own suppliers. The suppliers are also audited as part of the audit program within ASN. Respect for human rights and labour practices are included in these audits as well as environmental sustainability, business integrity and ethical conduct.

From a human rights perspective, the ASN Third Party Code of Conduct sets out the following key requirements:

Respect for Human Rights:

Suppliers must uphold and respect internationally recognized human rights and rights at work principles, including those outlined in:

- (i) the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and its related covenants),
- (ii) the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and
- (iii) the United Nations Guiding Principles on Business and Human Rights.

In their activities and operations, suppliers must provide just and favourable conditions of work, provide protection against unemployment, ensure decent treatment and appropriate working hours and rest.

Zero tolerance for child and forced labour:

ASN has strict policy and practices against using child labour, and zero tolerance for all forms of forced, bonded, or imprisoned labour in our own operations and our supply chain.

Non-Discrimination and Equal Opportunity:

Suppliers must provide a workplace free of discrimination, harassment, and abuse. Employment decisions must be based on qualifications, skills, and experience, without regard to race, gender, religion, age, disability, sexual orientation, or any other legally protected characteristic.

Safe and Healthy Working Conditions:

Suppliers are required to provide safe and healthy workplaces and working conditions by identifying and mitigating risks. This includes:

- (i) Regular safety training for employees.
- (ii) Access to protective equipment.
- (iii) Proper handling and storage of hazardous materials.

Freedom of association and collective bargaining:

ASN respects the right to collective bargaining and freedom of association. The collective bargaining agreement for ASN Norway is local. Employees can freely choose to join, not join, or leave unions and associations, and can select their representatives based on local and international practices. We encourage active, open communication and dialog with employees and/or their representatives.

Responsible sourcing and climate change obligations are managed under the ASN program. ASN is committed also to the RBA Code of Conduct and our material analysis and enterprise risk management procedures help identify potential supply chain risks.

Based on material analysis and the thorough screening process of our suppliers and the requirement for ASN's suppliers and partners to commit to the ASN Third Party Code of Conduct and the RBA Code of Conduct, ASN Norway has not identified any risk of adverse impact in our due diligence.

Measures and monitoring:

ASN Norway will continue to monitor potential adverse impacts on human rights and decent working conditions. This work will be based on our principles regarding approval of and follow-up with suppliers. This includes:

- Regular training of employees including HSE, Ethics and Compliance modules.
- Mandatory supplier compliance due diligence.
- Require all suppliers to sign up to the ASN Third Party Code of Conduct, the Responsible Business Alliance Code and to audit our suppliers with respect to these guidelines and human rights.
- Regular procurement evaluation of suppliers

This Transparency Act Statement covers the financial year 2025.

Trondheim, 24.06.2026

Signed by:

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Alain Mathieu Pierre Biston
Chairman of the board

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Marc Désiré Georges Genot
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Hilde Nakstad
General Manager/Board member