Transparency Act Report 2025

Introduction

As of July 1st, 2022, the Norwegian Transparency Act has been enacted. This legislation aims to encourage enterprises to uphold fundamental human rights and decent working conditions in their production of goods and provision of services. Additionally, it ensures that the public has access to information about how enterprises address adverse impacts on these rights and conditions.

The Transparency Act covers Dolphin Interconnect Solutions AS. This report covers due diligence assessments carried out during the financial year 2025 and is made available by 30 June 2026. The reporting period is annual. The report is published on our website www.dolphinics.com

Any questions regarding this report can be directed to CEO Hugo Kohmann (**info@dolphinics.com**).

About Dolphin

Dolphin develops, manufactures and sells high-speed, high-bandwidth interconnect hardware and software products. Dolphin products and technologies enable customers to build a variety of solutions from highly scalable, enterprise-class clustering solutions with standards-based hardware to embedded systems based on custom hardware and software. We support a wide variety of platforms that require a high-speed low latency interconnect. Dolphin products enable a variety of solutions based on customer requirement from the highest application performance to innovative capabilities such as sharing devices or hot adding devices. The company is privately owned by key employees.

Context of our business

Dolphin has outsourced manufacturing of all products to selected contract manufacturers. Standard products are purchased from approved vendors. Manufacturing of electronic products often involves complex global supply chains. Our main manufacturing partner is the Norwegian company Norautron, with which we have had close cooperation for decades. We also buy selected standard products from other approved sources worldwide for resale.

Organization

Dolphin is organized with HQ Dolphin Interconnect Solutions AS in Norway and a 100% owned subsidiary Dolphin Interconnect Solutions North America Inc. in Dallas, Texas supporting our sales and distribution

activities in our main market. All R&D activities and sales/marketing in the rest of the world is handled by the Norwegian office.

Values and ethics

Dolphin has implemented a set of values and ethics that we and our partners shall adhere to Values and ethics where Dolphin states that we are fully committed to supporting the United Nations Universal Declaration of Human Rights.

The Code applies to members of the Board of Directors, the CEO, members of management and all employees of Dolphin Interconnect Solutions AS and Dolphin Interconnect Solutions North America INC, as well as others acting on behalf of Dolphin companies. Compliance with these guidelines is the responsibility of every employee of Dolphin and subsidiaries.

Responsibility for follow-up of the Transparency Act is integrated into our management system, supplier approval process and quality management routines. Supplier-related risks are reviewed through supplier qualification, monitoring, audits, self-assessments where relevant, and ongoing dialogue with key suppliers.

Identification and assessment of adverse impacts

We are aware that the complex supply chains in the global electronics industry are a challenge regarding human rights and poor working conditions. The supply lines can be deep, involving many suppliers from mining raw materials to assembly of final products containing 100's of components.

As a small actor we do not have full visibility over the entire supply chain, but we have strong requirements for our suppliers that their sub suppliers also follow the same requirements that we have regarding human rights and decent working conditions. Our main components in our products are integrated circuits from well-known established companies.

Our main supplier, Norautron AS, is an established Norwegian company which is also subject to the Norwegian Transparency Act. We work closely with Norautron and visit its sites regularly. We conducted a full supplier audit together with one of our main US customers in 2024 with very satisfactory results. For the 2025 reporting year, we have reviewed the latest available information from Norautron.

We also procure services to support our business. These service providers are based in EU and should not impose any significant issues regarding this.

To support due diligence on conflict minerals, Dolphin uses the Z2Data platform to collect and manage Conflict Minerals Reporting Templates (CMRT) from relevant suppliers. This enables systematic tracking of

responses and supports our obligation to monitor the sourcing of tin, tantalum, tungsten, and gold (3TG) through the supply chain.

No actual adverse impacts were identified based on available information and due diligence performed in 2025. The main potential risks remain linked to the global electronics supply chain, including raw materials and minerals, semiconductor and component manufacturing, contract manufacturing, logistics, and the use of indirect sub-suppliers outside Dolphin's direct contractual control.

Summary of key risks

Based on our 2025 due diligence activities, Dolphin has not identified any actual adverse impacts. The key risks below are therefore assessed as potential risks related to our products, supply chain and business model. The assessment is risk-based and proportionate to Dolphin's size, role in the value chain and ability to influence suppliers and business partners.

Risk area	**Relevance to Dolphin**	**2025 assessment**	**Follow-up measures**
Raw materials and minerals	Electronic products may contain materials sourced through long and complex global supply chains.	Potential risk. No actual adverse impacts identified.	Continue supplier dialogue, review available supplier information, and prioritize follow-up of high-value suppliers.
Semiconductors and electronic components	Dolphin products include integrated circuits and components sourced from established global manufacturers and distributors.	Potential risk due to limited visibility beyond direct suppliers. No confirmed breaches identified.	Maintain approved supplier controls and follow up supplier declarations and risk information where relevant.
Contract manufacturing	Manufacturing is outsourced to selected contract manufacturers, with Norautron as the main manufacturing partner.	Lower direct risk due to close cooperation, regular contact and use of an established Norwegian supplier. No actual adverse impacts identified.	Continue regular supplier follow-up, visits and review of relevant Transparency Act information.
Indirect sub-suppliers	Sub-suppliers may be several levels removed	Potential risk due to reduced transparency and	Require suppliers to apply equivalent expectations to their own suppliers and

	from Dolphin's direct contractual relationship.	influence deeper in the supply chain.	escalate follow-up if risk indicators are identified.
Logistics and support services	Dolphin uses logistics and business support services, mainly in Europe and established markets.	Assessed as lower risk. No adverse impacts identified.	Continue normal supplier approval and monitoring processes.

Prevention of adverse impacts

We perform supplier monitoring and evaluation, including self-assessments where relevant, on a regular basis according to ISO 9001. Human rights and decent working conditions are included in the supplier survey sent to new suppliers and in follow-up of existing suppliers where risk or purchase volume indicates a need. We acknowledge that it can be difficult for a small company to obtain complete responses to all questionnaires, but we maintain close dialogue with key suppliers and visit our main suppliers at least yearly. We prioritize high-value and business-critical suppliers in these evaluations. We have not detected any problems regarding human rights and working conditions with any of our suppliers. If a supplier does not meet our standards regarding human rights and working conditions, the supplier is required to correct the problem to continue as an approved supplier.

Measures carried out or continued in 2025 included supplier evaluations, follow-up of main product suppliers, regular dialogue with our main manufacturing partner, on-site visits where relevant, and continued use of Dolphin's values and ethics requirements in supplier communication. Planned measures for 2026 include continued annual review of main product suppliers, follow-up of any missing or outdated supplier information, and review of published Transparency Act reports from key suppliers when available. The expected result is improved visibility of supply chain risks and earlier identification of any adverse impacts or significant risk indicators.

We receive concerns and questions about our business and our work under the Transparency Act at info@dolphinics.com.

Tracking progress

We track the number of supplier evaluations carried out yearly. Our goal is to evaluate our main product suppliers, defined as suppliers with annual purchases above NOK 1 million, on a yearly basis. In 2025, Dolphin had nine main product suppliers in this category. These suppliers were evaluated or followed up in 2025 regarding human rights and decent working conditions.

No confirmed human rights breaches or breaches of decent working conditions were identified in 2025. No incidents requiring remediation were recorded. Dolphin will continue to improve supplier follow-up and documentation in 2026.

Dolphin Interconnect Solutions AS completed its 2025 due diligence under the Norwegian Transparency Act with no identified adverse impacts and will continue to strengthen supplier oversight to address ongoing supply chain risks.

Oslo 30.6.2026

CEO
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28/6-2026

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