

Transparency Act Report 2023

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 applies to Dolphin Interconnect Solutions AS (Dolphin) from 2023, and this report is made available by 30th June 2024. The reporting period is annually. It is published on our website www.dolphinics.com

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

About Dolphin

Dolphin develops, manufactures, and sells high-speed, high-bandwidth interconnect hardware and software products. Our 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's offerings facilitate a multitude of solutions tailored to customer requirements, from achieving the highest application performance to pioneering capabilities like device sharing or hot-adding devices. The company is privately owned by key employees.

Context or our business

Dolphin has outsourced manufacturing of all products to selected contract manufacturers. Standard products are purchased from approved vendors. The manufacturing of electronic products often has a complex supply chain. Our main manufacturing partner is the Norwegian company with whom we have had a close cooperation for decades. We also purchase some 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 <u>Values and ethics</u> 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.

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 hundreds of components.

As a small actor we cannot have full control over the whole 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 that also operates under the Norwegian Transparency Act. We are working very closely with this company and visiting on-site regularly. We conducted a full supplier audit together with one of our main US customers in 2023 with very satisfactory results. The Transparency Act Report from Norautron 2022 is found here. We also procure services to support our business. These service providers are based in EU and should not present any significant issues regarding this matter.

Prevention of adverse impacts

We do supplier monitoring and evaluation (self-assessments) on a regular basis according to ISO 9001 which also considers human rights and working conditions in the supplier survey sent to new suppliers. We admit that it is difficult to get a response to these evaluations/questionnaires as a small company, but we are visiting our main suppliers at least yearly. We prioritize the high value suppliers when doing these evaluations. We have not detected any problems regarding human rights and working conditions with any of our suppliers yet. Should a supplier fail to meet our standards regarding human rights and working conditions, the supplier is required to rectify the issue to continue as an approved supplier.

We receive concerns and about our business on info@dolphinics.com

Tracking progress

We are tracking the number of supplier evaluations we do yearly. Our goal is to evaluate our main product suppliers (purchase more than 1 million NOK) yearly. In 2023 we have 8 product suppliers. We will evaluate these suppliers in 2024 regarding human rights and working conditions. No human right breaches were found in 2023.

Oslo 18.6.2024

CEO Hugo Kohmann

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