

TRANSPARENCY ACT STATEMENT

1. Introduction

FREYR Battery Norway AS and FREYR Battery Giga Arctic AS ("FREYR Battery Norway" or "FBN") are subsidiaries of T1 Energy Inc. At the end of 2024, the T1 group rebranded from Freyr to T1 and shifted its focus from developing clean, industrial-scale battery solutions to building an integrated U.S. supply chain for advanced solar and battery manufacturing.

This report covers FBN's 2024 assessments as required under the Norwegian Transparency Act, when FBN was preparing for and commencing operations at the Customer Qualification Plant and sealing the building shell and weatherproofing the Giga Arctic building in Mo i Rana, Norway. FBN does not fall under the scope of the Transparency Act with effect from 2025. Hence, this report represents our human rights due diligence for the fiscal year 2024 with a retrospective focus.

2. Governance

The Board of Directors of FBN has oversight responsibility of the management of the company, including oversight of risks related to adverse impact on human rights and decent working conditions. This includes ensuring that respect for human rights and decent working conditions have been systematically integrated into FBN's policies and decision making.

Key internal resources and departments including the Sustainability and the Procurement teams, were responsible for the implementation of relevant policies and procedures.

3. Policies and procedures

FBN is committed to respecting internationally recognized human rights and labor standards, as outlined in our Code of Business Conduct and Ethics, Human Rights Policy and Supplier Code of Conduct. For 2024, as for the previous years, human rights risk assessments were integrated into our enterprise risk management framework.

4. Due diligence activities

In 2024, FBN onboarded fewer suppliers than in previous years and terminated those existing suppliers which were no longer required for the companies' activities at the time. For the suppliers that we did engage, due diligence efforts included prequalification of suppliers and risk scoring during the procurement phase based on industry sector, geography etc. An integrity due diligence (IDD) tool provided by Dow Jones was implemented in 2024 for initial risk assessments of suppliers and partners. Based on input, each supplier was given a risk score. If the risk score exceeded acceptable levels, a more thorough due diligence process would be conducted using external global IDD service providers.

Suppliers were also subjected to contractual commitments to labor and human rights standards and required to sign and adhere to our Supplier Code of Conduct.

5. Operational risk management

Our operations preparedness plan for 2024 included:

- Risk registers and mitigation tasks
- Benchmarks on working conditions and compliance
- Close collaboration with public institutions and unions
- Iterative health, safety, and quality assessments

6. Findings and risk areas

Supply chain risks: Global sourcing of inputs to the Customer Qualification Plant introduces potential human rights risks. FBN mapped suppliers and origin countries applying a risk-based approach to engagement and audits, cf. section 3 above.

Weatherproofing phase: Identified risks include potential exposure to work accidents in the construction site environment, especially among foreign contractors. Measures in place include strict HSE protocols, routines and training, as well as compliance requirements and audits.

Employee conditions: No significant adverse impacts were identified. We monitor overtime, turnover, and sick leave, language and integration support compliance by manning agencies.

7. Stakeholder engagement

We maintained an active dialogue with employee representatives and unions and are party to a national framework agreement in Norway. Stakeholder feedback informed ongoing risk management efforts.

8. Grievance mechanisms and remedies

In 2024 FBN operated a publicly accessible whistleblower channel through EY supporting anonymous reporting, and we had a clear commitment to fair remediation in case of identified adverse impacts and supporting access to judicial and non-judicial grievance mechanisms (e.g., OECD NCP, CAO).

Signed by:

Evan Calio

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Evan Calio
Chair of the Board
6/30/2025

Signed by:

Andreas Bentzen

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Andreas Bentzen
Director of the Board
6/30/2025