



# Transparency Act Report

## Airthings Journey – June 2023

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# 1. Introduction to **Airthings**

## 1.1 Background on Airthings and transparency act

Airthings ASA (referred to as “Airthings” or “we”/“our”) is a global tech company creating award-winning radon and indoor air quality monitors for consumers, businesses, and professionals, as well as solutions to reduce the energy consumption of buildings significantly. Airthings ASA is a publicly listed company on Oslo Stock Exchange, with the ticker symbol AIRX. Airthings ASA is incorporated and domiciled in Norway with principal offices located at Wergelandsveien 7, 0167 Oslo, Norway.

Airthings and its subsidiaries (collectively “the Group”, or “Airthings”) consists of three legal entities Airthings ASA with two subsidiaries- Airthings INC with office spaces in Fort Worth ,TX, USA and Airthings AB, with office space in Stockholm, Sweden. Airthings ASA is covered by the Norwegian Transparency Act

18th June 2021 relating to enterprises' transparency and work on fundamental human rights and decent working conditions (referred to as “Transparency Act”) and therefore obliged to report on due diligence.

Airthings is covered by the Transparency Act as we exceed all the minimum conditions: Sales revenue of over NOK 70 million, Balance sheet over NOK 35 million, the average number of employees in the financial year is over 50 full-time employees.

- Sales revenue in the reporting year 2022: USD 35.4 million
- Number of employees in the reporting year 2022: 141

Airthings operates in the electronic sector and understands the increased risk of Human Rights violations in its supply chain, especially in relation to mining operations. To address this, Airthings actively identifies and assesses potential risks in its operations and supply chain. Taking strong action, Airthings works to prevent and mitigate any negative impacts, ensuring compliance with Human Rights standards within the electronic sector.

### Our story

Airthings was established in 2008, the company is led by a team of experienced scientists, engineers, leaders, and visionaries. Airthings is on a mission to empower the world to breathe better through simple, affordable, and accurate technology solutions that enable stakeholders to make data-driven

decisions to improve their health, save money, and help the planet.

Since the start in 2008, Airthings has introduced a steady stream of innovative solutions for consumers, businesses, and professionals to tackle indoor air issues such as radon, particle pollution (particulate matter, PM 2.5), carbon dioxide (CO2), mold risk, airborne chemicals (VOCs) and virus risk.

**To address a serious health issue, Airthings founders created the very first consumer digital radon detector**



Airthings for Business Indoor Air Quality (IAQ) monitors can be used to satisfy air requirements for the WELL Building Standard, and the products are RESET accredited, demonstrating our high standards in the IAQ market. The heart of our system is in the cloud where we turn data into advanced analytics. Airthings is gathering tremendous amounts of anonymized data from sensors in homes and buildings around the world, which are being used to add real insights for our customers. From industrial design and radio protocol to app creation, software, and firmware, our technology and solutions are developed in-house. Most of our products are smart products with corresponding apps, online dashboards, advanced cloud analytics, and APIs.

Airthings now offers digital radon detectors as well as smart indoor air quality monitors and solutions for professionals, homes, schools, offices, and other commercial buildings, and is continuously adding new features.

This is earning us our reputation for true leadership in the industry.

Airthings operates in the electronic sector and understands the increased risk of Human Rights violations in its supply chain, especially in relation to mining operations. To address this, Airthings actively identifies and assesses potential risks in its operations and supply chain. Taking strong action, Airthings works to prevent and mitigate any negative impacts, ensuring compliance with Human Rights standards within the electronic sector.

This is a report on the due diligence assessment that Airthings carried out for the following reporting year: 1st of July 2022 until 30th of June 2023.

To learn more about general information and follow up on Airthings, please visit [Airthings website](#), [sustainability report](#) and [annual report](#)

## International recognition



## Airthings' core values



### DARE

**to innovate, to take risks,  
to collaborate, to be  
curious, to lead, and to  
make a difference**



### LOVE

**our planet, our people,  
our products, our impact,  
and the experiences we  
create**



### FOCUS

**on creating the best  
experiences and solutions,  
on our customers,  
on speed, and on quality**



## 1.2 Purpose of this report

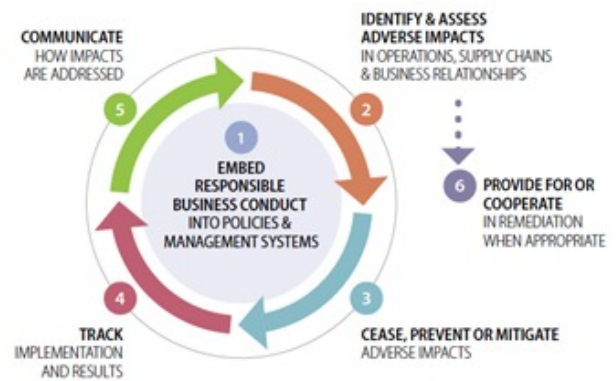
The purpose of the report is to document compliance with the Transparency Act. The report is published within the deadline for the first reporting year: 30th June 2023.

Airthings' purpose is to empower the world to breathe better. To do so, we focus on doing good for the environment, rather than less harm, across the dimensions of "planet, people, and business". As part of this, we want to improve our supply chain relationships by complying with and going beyond applicable laws and regulations upholding human rights & diversity, inclusive labor standards, and protecting the environment, in our own operations and within our suppliers and business partners.

## 1.3 Scope and methodology

We understand our principles as undergoing constant feedback for improvement to achieve our goals (KPIs) for zero harassment and human rights violations, and our commitment to a diverse and inclusive company. We are participants in the UN Global Compact, to improve and mitigate the different risks. Our approach to doing business responsibly and sustainably is reflected in our commitment to the United Nations Sustainable Development Goals (SDGs), especially SDGs 3, 8, 11, 12, and 13.

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct from the OECD, Guidelines for Multinational Enterprises. It also follows Airthings responsible business governance with a special focus on Airthings human rights, diversity & inclusion policy and the suppliers code of conduct.



Ref: Due Diligence for Responsible Business Conduct from the OECD



Ref: UN Sustainable development goals, Airthings focus



## 1.4 Strengthening our human rights governance

Airthings management system is based on our responsible business governance, policies, and guidelines: In 2022, we continued to strengthen our governance by implementing six policies and guidelines to ensure that we operate as a highly trusted company. In the next graph, you can visualize how our governance is organized:



We also provided training on human rights to ensure that all employees are aware of our policies and their role in maintaining the integrity of the organization. These efforts have been a key factor in enhancing our reputation and building trust among stakeholders.

## 2. Overview of human rights and decent working conditions in the supply chain

### 2.1 How Airthings defines human rights

We define Human rights following the definition from the Universal Declaration of Human Rights, as this set of standards that recognize and protect the dignity of all human beings.

“All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood” (article1)

Learn more in [Airthings Human Rights, Diversity and Inclusion Policy](#)

In addition, we also follow the definition in the Transparency Act Section 3 paragraph 2:

«Fundamental human rights means the internationally recognised human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work».

### 2.2 Importance of respecting human rights and providing decent working conditions in business operation and supply chain

Assessing human rights in business and supply chains is of paramount importance for Airthings. Firstly, it ensures that Airthings suppliers and business partners uphold ethical standards and treat their workers and stakeholders with dignity and respect.

By evaluating human rights practices, Airthings can identify and address potential abuses, such as forced labour, child labour, or unsafe working conditions. Secondly, assessing human rights fosters transparency and accountability, enhancing a company's reputation and credibility.

It also mitigates legal and financial risks associated with human rights violations. Lastly, by prioritizing human rights, businesses contribute to sustainable development and positively impact communities, fostering a fairer and more equitable global economy. Overall, assessing human rights in business and supply chains is crucial for ethical, legal, and social reasons, benefiting both companies and society as a whole.

Learn more in [Airthings Supplier Code of Conduct](#)



## 3. Airthings supply chain risk assessment

### 3.1 Description of Airthings supply chain

In 2021 we did a risk assessment based on the environmental and social aspects, positive and negative. The below overview highlights the main risks related to Airthings' supply chain.

Airthings will continue to perform a strict due diligence assessment of its supply chain – focusing mainly on suppliers and Business partners with operations in countries with high risk and/or based on Procurement Value of over 100.000 NOK in 2022. In addition, many of Airthings suppliers are manufacturers of physical components by using plastic, batteries, and minerals.

These suppliers are being assessed on risks for negative impact on decent working conditions such as HSE, employee's wellbeing etc.

Airthings will therefore also focus the assessment on the suppliers that manufacture physical components

According to our research, the higher in the stream you go in the supply chain map the higher the risk of social and environmental risks. Potential risks include child labour, human and labour rights abuses, and hazardous chemicals.

For electronic equipment, we currently follow the guidelines of the Responsible Business Association, and the Responsible Mining Association Standards and policies for screening our supply chain's environmental and social impacts. We also have grievance mechanisms and whistle-blowing platforms for anyone linked to our supply chain.



Ref:

1. [EY - Top 10 business risks and opportunities for mining and metals, 2023](#)



### 3.2 Commitment and actions in the supply chain

Airthings manufacturing is outsourced to companies located in Norway, Tunisia, and Israel and the main components are sourced from Malaysia and China.

In Airthings' supply chain, Tunisia as a country presents human rights risks including restrictions on free speech, violence against women, and weakened democratic institutions. Vigilant monitoring is essential to address these concerns and ensure compliance with human rights standards ([Human Rights Watch, 2023](#)).

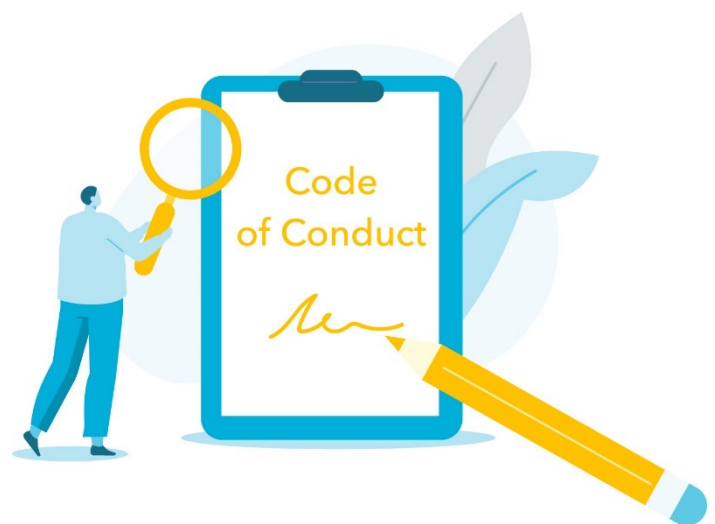
Doing business in Israel carries human rights risks, including the ongoing Israeli-Palestinian conflict, settlements in occupied territories, and concerns regarding the treatment of Palestinian populations. Vigilant monitoring and engagement with suppliers are crucial to address these risks and uphold human rights standards in the supply chain ([Human Rights Watch, 2023](#)).

In the context of Airthings' supply chain in Malaysia, the country's political instability has led to concerns for human rights issues. These include investigations, arbitrary arrests of government critics, and a hardline anti-migrant policy. Additionally, the government has expressed threats against the rights of the LGBT community. Although there was a change in leadership, the overall approach to human rights by the government has shown little improvement. Airthings must remain vigilant in monitoring and addressing these risks to uphold human rights standards within its supply chain in Malaysia ([Human Rights Watch, 2023](#)).

Operating in China poses human rights risks, including concerns regarding labour rights, freedom of expression, and the treatment of minority groups such as Uighurs and Tibetans. The Chinese government's policies, such as mass surveillance and censorship, have raised alarms ([Human Rights Watch, 2023](#)).

To mitigate these risks in the countries mentioned, Airthings must ensure diligent monitoring and engagement with suppliers, promoting transparency, and actively working to uphold human rights standards and ethical practices within its supply chain operations.

We are responsible for looking deep into these risks and making them an opportunity to improve the conditions and well-being of the people involved in our supply chain and the environment. For this, we created a supplier's code of conduct that we have started the process of getting signed by all main manufacturers.



### 3.3 Suppliers code of conduct and implications

We expect our suppliers to share this commitment, thus all suppliers must commit to adhering to the Airthings Suppliers Code of Conduct. This supplier's Code of Conduct defines the basic requirements to meet our standards. This Code applies to the whole supply chain, including sub-suppliers, and sub-contractors. It equally applies to permanent, temporary, and agency workers, as well as salaried, hourly, paid, legal young workers (minors), students, part-time, night, migrant workers, and any other type of workers.

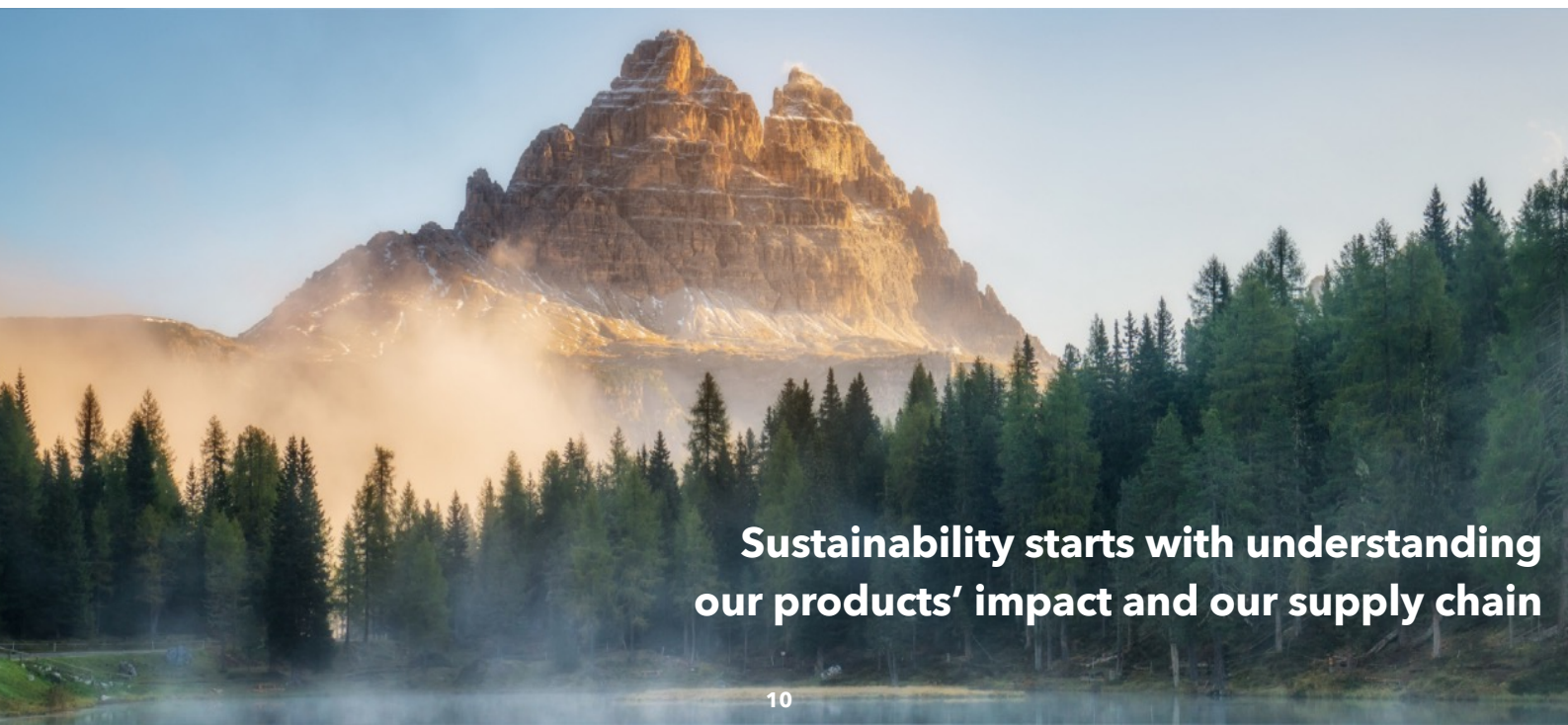
When one of these standards is not met or broken, Airthings will proceed with an internal investigation. This will be communicated to the supplier. Following this, there will be a dialogue where both parties should agree on the expected improvements. Timelines for achieving compliance shall be reasonable and defined by both parties, and proof of corrections must be presented to Airthings. As a special case, any violation of the policies on child labour is entitled to a specific remedy specified in the Suppliers' code of conduct.

### 3.4 Responsible Team

The Airthings Leadership Team (ALT) has the responsibility for overseeing the implementation of the suppliers' code of conduct and ensuring that any breaches are investigated by the assessment team.

The owner of the responsible business conduct framework is owned by COO - Audhild Randa, it is monitored by Sustainability Manager Erwin Hasselbrinck and Supply Chain Manager - Karolina Skuland. Any inquiries should be sent to [transparency@airthings.com](mailto:transparency@airthings.com) or through our anonymous [report an incident platform](#); likewise, you can have an overview of the [Airthings guidelines of the transparency act](#).

All major inquiries can be reported through the whistle-blower channel found on the Airthings website. The Airthings assessment team will be responsible for the due diligence of any case reported through the whistle-blower mechanism.



**Sustainability starts with understanding  
our products' impact and our supply chain**

## 4. Airthings

# Goals, efforts and initiatives

### 4.1 Measures implemented in the reporting period 2022 - 2023

Goal q2 2023	Description	Deadline	Results	Actions taken	Findings
List of suppliers relevant for Transparency Act	Work out the Overview of Supply chain and Business partners with a description of which services the suppliers and Business partner provides relevant for Airthings by using the document Appendix to the Checklist Due Diligence Assessment: Overview of Supply chain and Business partners	15th of May 2023	Establishment of a dedicated Airthings team and consultancy for supply chain assessment	<ol style="list-style-type: none"> <li>1. Methodology documentation and roles defined for supply chain assessment</li> <li>2. Collaboration with Bing Hodneland Advokatselskap DA for Transparency Act management and analysis of the risk level of our supply chain</li> <li>3. Implementation of top Management reviews and Reports for Transparency Act compliance</li> </ol>	
			Internal risk assessment of Airthings' operations	<ol style="list-style-type: none"> <li>1. Comprehensive In-Depth Analysis of Airthings' Internal Human Rights Assessment including policies, practices, and procedures within the organization</li> </ol>	<ol style="list-style-type: none"> <li>a) Our internal operations have a low risk of human rights violations.</li> <li>b) Airthings has identified the lab for the hardware/firmware group in the Oslo office as a particular area of focus for employee health and safety initiatives</li> <li>c) Lack of awareness and compliance with safety rules in the USA Office</li> </ol>
			Analysis of key suppliers in ERP System based on transaction volume, country risk and material focus	<ol style="list-style-type: none"> <li>1. In-Depth Evaluation of Suppliers based on Procurement Value of over 100.000 NOK in 2022</li> </ol>	<ol style="list-style-type: none"> <li>a) Airthings' supply chain includes companies in high-risk countries such as Tunisia, Israel, and China, necessitating careful attention to human rights compliance.</li> <li>b) In the electronic sector, the sourcing of raw materials could come from conflict zones and contributes to a higher risk of human rights violations</li> <li>c) Airthings is currently analysing a 185 suppliers and business partners some are located in high-risk countries known for potential human rights violations. After an initial assessment where divided between very important and others.</li> <li>d) This resulted a total of 40 suppliers and business partners with deep dive analysis in Tier 1.</li> </ol>
Risk assessment most important Business partners	Perform risk assessment of most important third parties that are considered Business partners in document section 3.1 of the Appendix to the Checklist Due Diligence Assessment: Overview of Supply chain and Business partners	5th of June 2023	Collection of certifications and audits from Airthings main business partners	<ol style="list-style-type: none"> <li>1. Analysis of 1st-tier business partners focusing on IT infrastructure and logistics</li> <li>2. Analysis of documentation on 10 important business partners</li> <li>3. 137 other business partners we will be analyzed depending on their risk level during 2023</li> </ol>	<ol style="list-style-type: none"> <li>a) One of our IT business partners has no human rights or environmental statement. Therefore, we should start conversation with them on their policies.</li> </ol>

Goal q2 2023	Description	Deadline	Results	Actions taken	Findings
Risk assessment most important suppliers	Perform the risk assessment of most important suppliers in the Supply Chain by using the document section 2.1 of the Appendix to the Checklist Due Diligence Assessment: Overview of Supply chain and Business partners	5th of June 2023	Collection of certifications and audits from main manufacturers in the supply chain	1. Analysis of 1st-tier suppliers and specifically focusing on its main manufacturers 2. Adopted a materiality approach and conducted a thorough analysis of a total of 60 suppliers 3. Analysis of documentation on: •30 important suppliers •30 other suppliers	a) All of the main suppliers have documentation in order b) Our main manufacturer has demonstrated its commitment to ethical practices by signing Airthings' supplier's code of conduct. Additionally, it has taken further steps by hiring a sustainability manager as part of their core operations and initiatives c) Airthings has accepted one of the important manufacturers' code of conduct as it aligns with Airthings' own code of conduct. However, this manufacturer has yet to formally sign Airthings' specific suppliers' code of conduct d) Our main manufacturers have no 3 <sup>rd</sup> party audit on social and environmental responsibility
			Initial Overall Policy Screening of Selected Sub-suppliers (2nd tiers)	1. Focus on Critical Component Sub-suppliers in Hardware Products 2. Analysis of 21 Sub-suppliers (2nd tiers) 3. Questionnaire Sent to 9 Tier 1 and Tier 2 Suppliers with no public policies	a) Out of the 9 suppliers who received the questionnaire, 8 of them responded within the designated timeframe. This indicates a positive engagement from the suppliers in providing their responsible business policies b) The questionnaire uncovered that one of our important sub-suppliers (tier 2) don't have any written policies on human rights, code of conduct and environmental policies. We will follow up with this sub-supplier to create corrective action plans.
			Integration of New Suppliers into Supplier System and Risk Assessment	1. All new suppliers have been successfully screened within the risk assessment process.	a) The new main supplier had previously gone through a SMETA audit (Sedex Members Ethical Trade Audit), which provided insights into labour standards, health and safety practices, environmental performance, and ethical conduct within their site b) The SMETA audit highlighted only one concern regarding the high intensity of overtime working hours within the supplier's operations c) Airthings engaged in discussions with the supplier to address the issue of high intensity overtime working hours. The supplier has demonstrated a commitment to rectifying this concern and has implemented corrective action plans to prevent its recurrence in the future
Update the Transparency Act information online	Publish information at Airthings' home page regarding the Transparency Act with link to the report in PDF, and the report shall be based upon the status on measure 1 – 3 in this Plan of action as well as the due diligence assessment carried out for 1 year as filled out in this document including appendices and other documents referred to	30th June 2023	1st Transparency act report published in Airthings website	1. Disclosure of Airthings 1 year of in-depth analysis of its supply chain and business partners	You can find the report with all the ESG/sustainability report at: <a href="https://www.airthings.com/sustainability/reports">https://www.airthings.com/sustainability/reports</a>



## 5. Goals

# Upcoming report

### 5.1 Goals June 2024

Goal	Description
Map out additional 2nd and 3rd tiers from Important Suppliers	As we know there could be issues in the raw material extraction, we would like to go deeper into the supply chain to understand more about where our raw materials come from
Thorough review of business partners	As we focused on the supply chain this year, as this was the area with the highest risk, we intend to work more with the business partner next year. We aim to cover Important business partners with more detailed research and questionnaires next year.
Request existing important suppliers to sign Airthings Suppliers Code of Conduct	So far, we have only required main manufacturers to sign the Supplier code of conduct, as well as any new suppliers. We should expand this to all important Suppliers. We could also consider implementing this with important Business partners, especially suppliers with no environmental and/or social statement and policies.
Update due diligence assessment	The most recent due diligence and materiality assessment was done in 2021 and it should be updated based on the findings in the work with the Transparency Act
Review and update safety routines for US office	Need for improved communication, training, and clarity regarding the rules and regulations within the US office of Airthings
Training for the main manufacturer on human rights and report an incident platform	So far only top management have received training on the report of an incident platform. All workers in the factory should receive training and a visit from the Airthings sustainability manager to the factory.
Social External Audit (e.g., SMETA) for the main manufacturer	We will ask our main manufacturer to be audited through a Social External Audit (e.g., SMETA), to ensure that their processes are in line with our views and goals.

# 6. Conclusion

## 6.1 Airthings: Committed to Human Rights and decent working conditions in the Supply Chain

Airthings' commitment to upholding human rights within its supply chain reflects its dedication to ethical practices and responsible business conduct. The company's comprehensive approach to supplier assessments, screenings, and corrective actions demonstrates a clear recognition of the importance of safeguarding human rights throughout its operations.

Analysing all major manufacturing suppliers, asking for documentation from the most important 2nd tier suppliers, demonstrates our commitment to understanding our supply chain. Airthings engages in open dialogue, addresses identified issues, actively works to mitigate risks, and ensures compliance with international labour standards and the Transparency act. The findings so far are positive, as the majority of suppliers seem to focus on this topic and were responsive to our requests. The findings on one of our main component suppliers with lack of written policies and the discovery of high intensity overtime working hours in our new suppliers, highlight the critical need for ongoing vigilance and continuous improvement.

We will focus on improving these first findings, and dig deeper in select areas next year. We will continue our thorough research with visits to our main manufacturers factory to uphold training in human rights and asking for documentation of social and environmental external audits. We will continue our journey so that all our major hardware component suppliers and business partners sign our suppliers code of conduct, likewise with those that have no public social and/or environmental statements and policies.

Airthings' dedication to transparency, accountability, and stakeholder engagement is crucial in building a sustainable and ethical supply chain. By holding suppliers accountable and fostering a culture of respect for human rights, Airthings sets a positive example for the industry, influencing others to prioritize similar measures.

Moving forward, Airthings will continue to prioritize human rights due diligence, emphasizing collaboration with suppliers and proactive risk management. By doing so, Airthings not only protects the well-being of workers but also strengthens its brand reputation and contributes to the broader global effort to ensure a responsible and sustainable supply chain.

This document was approved by the Airthings board of directors and CEO, Oslo 29<sup>th</sup> of June 2023



Øyvind Birkenes  
CEO



# 7. References

## 7.1 List of sources consulted in the cited paper

### OECD Guidelines:

Introduction to the OECD's guide for due diligence assessments, see the website

[www.responsiblebusiness.no/nyheter/nyttig-norsk-verktoy-for-aktsomhetsvurderinger-for-ansvarlig-naeringsliv/](http://www.responsiblebusiness.no/nyheter/nyttig-norsk-verktoy-for-aktsomhetsvurderinger-for-ansvarlig-naeringsliv/). OECD's guide for due diligence assessments for responsible business, see the website

[https://files.nettsteder.regjeringen.no/wpuploads01/blogs.dir/263/files/2019/09/201904\\_OECD\\_DDveiled\\_er\\_nettil.pdf](https://files.nettsteder.regjeringen.no/wpuploads01/blogs.dir/263/files/2019/09/201904_OECD_DDveiled_er_nettil.pdf).

Country risk analysis:

Human Rights watch, 2023, Tunisia: <https://www.hrw.org/world-report/2023/country-chapters/tunisia>

Human Rights watch, 2023, Israel: <https://www.hrw.org/world-report/2023/country-chapters/israel-and-palestine>

Human Rights watch, 2023, Malaysia: <https://www.hrw.org/world-report/2022/country-chapters/malaysia>

Human Rights watch, 2023, China: <https://www.hrw.org/world-report/2020/country-chapters/global>

### Other sources:

Global Slavery Index, see website [www.globalslaveryindex.org/2018/data/maps/#prevalence](http://www.globalslaveryindex.org/2018/data/maps/#prevalence)

Global Rights Index, see website [www.globalrightsindex.org/en/2022](http://www.globalrightsindex.org/en/2022)

Country Reports on Human Rights Practices, see website [www.state.gov/reports/2021-country-reports-on-human-rights-practices/](http://www.state.gov/reports/2021-country-reports-on-human-rights-practices/)

UN: Working Group on Business and Human Rights, see website [www.ohchr.org/en/special-procedures/wg-business](http://www.ohchr.org/en/special-procedures/wg-business)

Universal Human Rights Index (UHRI), see website <https://uhri.ohchr.org/en/>

Business Human Rights, see website [www.business-humanrights.org/en/](http://www.business-humanrights.org/en/)

Corporate Human Rights Benchmark, see website [www.worldbenchmarkingalliance.org/corporate-human-rights-benchmark/](http://www.worldbenchmarkingalliance.org/corporate-human-rights-benchmark/)

## 7.2 List of sources and documents this report is based on

The Transparency Act: Lovdata has an [English version](#) of the Transparency Act (Lovdata also the official and updated version only in Norwegian).

### Internal documents that we use to comply with the Transparency Act:

01 - 2023-03-09 Compliance Transparency Act - Airthings (the document contains checklists, routines, risk assessments and self-controls established and maintained by Airthings)

02 - 2022-11-28 Checklist Transparency Act - Airthings (the assessment that shows that Airthings is obliged to comply with the Transparency Act),

03 - 2023-04-23 Checklist Due Diligence Assessment - Airthings (describes internal roles and responsibilities and shows the due diligence assessments carried out, as well as the Plan of action)

04 - 2023-06-07 Overview of Supply chain and Business partners - Airthings (shows the overview of the Supply chain and Business partners that Airthings considers relevant for the due diligence assessments according to the Transparency Act).

Airthings Sustainability Report, Breathe better report 2022:

<https://www.airthings.com/hubfs/Website/sustainability/Airthings-Sustainability-Report-2022.pdf>

Airthings Annual Report, 2022: <https://www.airthings.com/hubfs/Website/investors/reports/Airthings-Annual-Report-2022.pdf>



Reaching new heights on our  
**sustainability journey**







**AIRTHINGS**

**Breathe better. Live better.**