Report under the Transparency Act

1. Introduction

This report on human rights due diligence is made by Bitdeer Norway AS, Norwegian AI Technology AS, Troll Housing AS and Tydal Data Center AS (collectively, the “Companies”) in accordance with Section 5 of the Norwegian Transparency Act (the "Transparency Act”).

This report is for the period 1 January 2025 to 31 December 2025.

2. Companies' and operations

The Companies are part of the international subsidiaries of Bitdeer Technologies Group (“Parent”).

Bitdeer Norway AS is a hash service provider, providing computing power in a specified quantity, measured by computing power by second, or hash rate, derived from the supercomputing servers held.

Norwegian AI Technology AS provides hosting of super-hashing computer equipment and related facility maintenance and administrative services.

Troll Housing AS and Tydal Data Center AS provide data center infrastructure services to Norwegian AI Technology AS, including construction and facility management.

The Companies have overlapping business activities and share common policies, due diligence procedures, and supply chains through their group structure as subsidiaries of Parent. We have prepared a consolidated Transparency Act report.

3. Overview of compliance structure

The Board of Directors of the Companies holds the overall responsibility for the risk management, policies and overall compliance. The management teams of the Companies carry out implementation of compliance routines in the daily operations of the Companies, supported by relevant divisions of the Parent, such as Human Resources, the Legal Department and Procurement. Our Risk Management Department oversees the compliance work in relation to human rights and decent working conditions.

4. Guidelines, procedures and routines

The Companies support and respect human rights and decent working conditions in our business operations. We strive to provide employees with a safe and healthy work environment, and have a zero tolerance for discrimination or harassment based on race, ethnicity, religion, gender, age, etc.

The Companies expect and require our suppliers and business partners to do the same, and we conduct due diligence in this respect in accordance with the OECD (Organisation for Economic Co-operation and Development) Due Diligence Guidance for Responsible Business Conduct, which is a central guiding principle of the Transparency Act.

The Companies' Code of Business Conduct and Ethics (the “Code”) forms the basis of our business culture, and provides guidelines designed to sensitize employees to violations of the law and ethics and to understand the mechanism and necessity for reporting illegal or unethical conduct. The Code includes guidelines and requirements on, inter alia, human rights, occupational health and safety, working environment, equality, anti-discrimination and anti-harassment, as well as our procedures for reporting/whistleblowing, including, for example, prohibiting all forms of forced, compulsory and child labor. Additionally, the Companies' maintain a Whistleblower Policy, which is designed to ensure that employees and third parties, including vendors and suppliers, are aware of how to report a good faith complaint about possible violations of laws, regulations or policies related to our business or supply chain.

The Code, along with our other policies are guidelines are presented to employees upon hiring and are routinely discussed through staff training in the Companies.

The Procurement Management System sets out guidelines on purchasing, supplier management and supplier evaluation, inter alia, in terms of suppliers' compliance with laws and regulations and their respect for human and labour rights. The guidelines set out that suppliers shall undergo review regularly, and that suppliers who fail the review shall either be disqualified or suitable measures towards the supplier shall be implemented.

5. Risk assessment

There is a general supply chain risk associated with both the industry/product (ICT hardware) and the geographical area, and the risk tends to be prevalent in the upstream supply chains, where production processes are more labour intensive, and the transparency and oversight of working conditions are more limited. The risk mainly relates to excessive use of overtime and low wages. We are fully aware of the risk, which relates to the global ICT hardware industry in general.

The Companies' main suppliers include the principal energy suppliers that supply electricity to the data centers, manufacturers of materials used for our mining servers, and local data center suppliers who provide service, construction, and rental of land in relation to the two Norwegian mining facilities (Troll Housing AS and Tydal Data Center AS).

Our electricity and local data center suppliers are from Norway, Sweden, and Denmark, where significant risks of adverse impacts were not identified due to robust legal frameworks, high corporate governance standards and strong enforcement of human rights protections.

The Companies' assessment of other suppliers also did not lead to identification of significant risks of adverse impacts.

The majority of our suppliers are also subject to the Transparency Act themselves. This allows us to confidently rely on their supply chain documentation and due diligence assessments.

6. Compliance measures and assessment of results

Our measures to identify, assess and address the risk of negative impacts on human rights and decent working conditions include selecting our suppliers carefully, strengthening contractual requirements on suppliers, and strengthening our own protocols for obtaining information from suppliers on sub-suppliers.

In addition to conducting pre-contract and ongoing supplier assessments, the Companies have also implemented an annual survey/assessment of risk of adverse impacts on human rights and decent working conditions in the operations, supply chain and among business partners. Key assessment factors include geographical risk, industry risk, the probability/seriousness of the risk, our connection to the risk and leverage, as well as the suppliers' responses to our inquiries.

In 2025, we evaluated all new vendors from our Norwegian entities above certain thresholds by performing a survey and a screening for any human rights or sanctions related issues. Existing suppliers that have already undergone a previous assessment will be re-screened against databases for potential issues. We have also checked the Transparency Act reports of business partners who are subject to the Transparency Act.

In our review we noted that one supplier had disclosed incidents relating to the Transparency Act. The incident concerned wage levels and insufficient pay and constituted a breach of the contractual requirements between the supplier and sub-supplier. The breach was immediately handled with the sub-supplier through confirmation of payment of outstanding wages, and the supplier provided guidance to the sub-supplier. As such, no further action was required from us.

Our assessments have otherwise not identified any actual adverse impacts or significant risks in our supply chain requiring concrete measures further to our implemented general measures. Yet we continuously strive to strengthen our routines and measures to identify, assess and address the risk of impacts in the supply chain because we understand that due diligence is a continuous effort.

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Oslo, 30 June 2026

Wang Wenguang

Wenguang Wang

Chair of Norwegian AI Technology AS and Bitdeer Norway AS

Ge Song.

Ge Song

Board member of Bitdeer Norway AS and Norwegian AI Technology AS

Haakon Bryhni

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