

February 2025

Galleon Embedded Computing AS

Org.nr. 994 608 177

Annual report on due diligence assessments

This annual report on due diligence assessments has been prepared as a response to the Norwegian Transparency Act (the "Apenhetsloven") which is concerned with the openness of businesses, basic human rights and decent working conditions. The report is updated and published on the company's website by 30 June each year, or as needed in the event of significant changes in the company's risk assessments.

The Business

Galleon Embedded Computing AS ("Galleon") is a technology company started in 2009 with a focus on developing high-performance, high-quality storage solutions and small rugged data recorder systems, servers, and network-attached storage devices. Galleon's products cover a wide range of applications, in environments ranging from benign to severe.

Galleon is part of Spectra Aerospace and Defense, LLC ("Spectra", Alpharetta, GA, USA) and is fully owned by Spectra. Galleon has its headquarters in Oslo which is also where development and assembly of products takes place. As of June 2024, Galleon has 45 employees.

Guidelines and policies in place for basic human rights

Galleon addresses basic human rights through the implementation of a code of conduct based on the Ten Principles of the UN Global Compact. Galleon's code of conduct is also flowed down to Galleon's supply chain and partners.

Due Diligence assessments 2025

Assessments are based on the UN's Guiding principles on Human Rights, local Norwegian Law and also the Norwegian Privacy Act. Locally, Galleon either meets or exceeds the legal expectations for local employees. As of February 2025, this is implemented through the use of an employee handbook available to all employees which also includes references to current law clauses such that employees are aware of their legal rights.

Supply Chain

Galleon purchases electronic assemblies, electronic components for its products from mostly well-established large international organizations. Mechanical parts are purchased from smaller, more local businesses where Galleon has greater oversight in the day to day operations. All suppliers to Galleon meet the Galleon Code of Conduct which include basic human rights requirements either via their own statements and market analysis, or via Galleon's own Supplier Questionnaire. As of January 2025, all suppliers have been evaluated during the annual supplier review.

Corporate Social Responsibility

Galleon has committed to engaging with the elements of corporate social responsibility of environmental responsibility, ethical responsibility, economic responsibility, through submitting to an independent evaluation of activities, processes and measures by Ecovadis. Galleon scores in the top one third for business in the manufacture of computers and peripheral equipment. Galleon has attained Bronze sustainability rating.

Right to Information

Section 6 of the Transparency Act (Right to information) requires companies to respond to requests from the public on how the company is managing actual or potential human rights impacts across its organization and supply chain. Galleon has established a process for receiving and managing such requests.

Do you have a request? Please submit your question to the email address at the bottom of this page, or contact the undersigned.

Name: Darren Thurston

Title: Quality & Compliance manager
Galleon Embedded Computing AS