

BR!GHT

Human Rights Statement

2025-2026



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About Us

BRIGHT is a leading provider of innovative, portable solar solutions for long-term humanitarian needs and emergency preparedness efforts. Our products enable people and communities to safely access reliable light and energy; reduce vulnerability during crises; and enhance disaster resilience with minimal environmental impact.



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“Human rights due diligence is only meaningful if it improves over time. This year, we strengthened our methodology through a cross-team review of how we evaluate risk, and introduced a new internal tracking system that allows us to monitor how identified risks evolve from cycle to cycle. These changes reflect our determination to move from compliance toward genuine accountability. We know there is always more to learn, and we remain committed to doing this work with rigour and honesty.”

CEO, Kariane Ellekrans

Our Vision

Access sustainable
light and energy
anywhere.



Our Mission

To enhance safety, resilience, and wellbeing by providing world-class solar solutions that ensure reliable access to sustainable light and energy, whenever and wherever it is needed.

Executive Summary

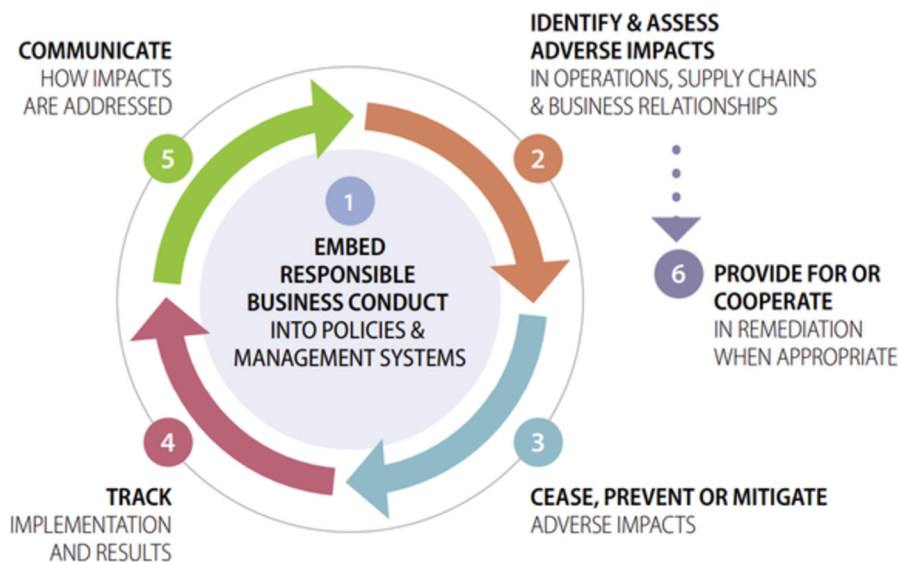
This report outlines BRIGHT's human rights due diligence activities carried out between July 2025 and June 2026, in accordance with the Norwegian Transparency Act (Åpenhetsloven). Our approach continues to align with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

This year, BRIGHT has strengthened its due diligence methodology in two important ways. We reviewed our risk evaluation process in collaboration with our R&D Team, and transitioned to a new internal tracking system designed to provide a clearer, more structured overview of how risks evolve from year to year.

As a result of this more rigorous approach, the scoring of some identified risks has been re-evaluated, reflecting the maturation of our methodology rather than a deterioration of conditions.

Our supply chain engagement continued through on-site visits to our primary manufacturer and four sub-supplier facilities, covering cable, solar panel, plastic, and packaging. We are pleased to report that all corrective actions identified in the previous third-party audit were successfully implemented by our supplier.

No risks requiring immediate cessation or mitigation were identified during this reporting period.



Embed Human Rights

Embedding human rights means integrating respect for people into the core of how an organisation operates. For BRIGHT, this means ensuring that human rights considerations inform not only what we do, but how we do it.

The UN Guiding Principles on Business and Human Rights (UNGPs) are clear that a company's responsibility to respect human rights must be reflected at the highest levels of leadership.

At BRIGHT, our Board holds ultimate accountability for strategic alignment and policy enforcement, while the Management Team ensures these commitments are operationalized in practice.

BRIGHT's human rights efforts are grounded in a set of policies that reflect our values and responsibilities. These standards serve as a foundation for our daily operations, partner expectations, and long-term human rights risk management.

	Purpose	Aligns with
Human Rights Policy	Outlines BRIGHT’s commitment to internationally recognized standards. Identifies areas with highest potential human rights impact (e.g., labour conditions, employee rights).	International Bill of Human Rights UN Guiding Principles on Business and Human Rights (UNGPs) ILO Conventions OECD Guidelines for Multinational Enterprises
Code of Conduct	Provides ethical guidelines for employees, board members, and suppliers, covering human rights, anti-corruption, environmental protection, and inclusive conduct.	Aligned with: International Bill of Human Rights UNGPs ILO Conventions OECD Guidelines

Identify & Assess Impacts

BRIGHT's human rights due diligence is designed to be practical, rights-holder-centered, and integrated into our broader risk management practices. In line with ISO standards 9001:2015 and 14001:2015, our system has been adapted to identify risks not only to the company, but to the people impacted by our work.

Our methodology follows the same five-step approach established in previous years: scoping and mapping, rights and rightsholder identification, risk identification, evaluation, and prioritization.

Supply Chain Visits & Audit Follow-Up

As part of our annual due diligence cycle, BRIGHT conducts on-site visits to our main manufacturing supplier and key sub-suppliers. This year, visits were carried out to four sub-supplier facilities (cable, solar panel, plastic, and packaging) in addition to our primary factory.

1 Scoping and mapping

We start with a high-level overview of BRIGHT's operations, suppliers, and contextual risks, helping us determine where deeper analysis is required.

2 Rights and rightsholders identification

We identify those who could be affected by our activities, with a focus on both internal employees and external stakeholders such as supplier and sub-supplier workers.

3 Risk identification

We draw on sources including internal mapping, site visits, third-party audits, and global indices and reports to identify human rights risks.

4 Evaluation

Each risk is assessed based on severity and likelihood, and identifies BRIGHT's relation to it (direct cause, contribute, or linked to).

5 Prioritization

Based on the evaluation results, we determine which issues require immediate attention and define a clear path for response.



These visits are not purely a compliance exercise. They are an opportunity to verify that working conditions, safety standards, and responsible business practices are functioning as expected, but also to learn directly from our partners, strengthen relationships, and build the kind of mutual trust that makes long-term collaboration meaningful. We believe transparency in the supply chain starts with showing up.

During factory visits, our team reviewed several areas of operations, including the warehouse, the quality testing laboratory, the loading process, and conducted independent product quality tests on-site. This hands-on approach gives us a fuller picture of conditions beyond what documents and reports alone can

Strengthening our tools and methodology

This reporting cycle, BRIGHT's risk evaluation process was reviewed in collaboration with our R&D Team bringing a more structured and cross-team perspective to the assessment.



Risk Assessment Results

Possible Human Rights Affected	Risk	Potentially affected rightsholders	Actual or Potential	Score	Relationship
Freedom from discrimination ILO Convention 111 UDHR article 1,2 ICCPR article 2, 26 ICESCR article 2	Discrimination and harassment	Own workforce	P		Direct
		Supply chain (Tier 1)	P		Linked
		Supply chain (sub-suppliers)			Linked
Freedom from slavery or servitude, prohibition of forced or compulsory labour UDHR article 4 ICCPR article 8 ILO Convention 29 and 105	Forced labour	Supply chain (Tier 1)	P		Linked
		Supply chain (sub-suppliers)	P		Linked
Prohibition of child labour ICESCR article 10 ILO Convention 138 and 182	Child labour	Supply chain (Tier 1)	P		Linked
		Supply chain (sub-suppliers)	P		Linked
Just and favourable conditions of work, safe and healthy working conditions UDHR article 23, 24 ICESCR article 7 ILO Convention 155, 187 ILO Recommendation 164 ICESCR article 7	- Unhealthy working conditions - Unsafe working conditions - Work-related illness - Minor or remediable illness/injury - Injuries and fatalities - Excessive overtime working hours	Own workforce	P		Direct
		Supply chain (Tier 1)	A		Linked
		Supply chain (sub-suppliers)	A		Linked

Risk Assessment Results

Possible Human Rights Affected	Actual or Potential Risks	Potentially affected rightsholders	Actual or Potential	Score	Relationship
Right to equal pay for equal work UDHR 23, 24 ICESCR article 7 ILO Convention 100	- Inadequate payment of wages - Pay discrimination	Own workforce Supply chain (Tier 1) Supply chain (sub-suppliers)	P A A	  	Direct Linked Linked
Right to form and join trade unions and right to collective bargaining. UDHR 23 ICCPR article 22 ICESCR article 8 ILO Convention 87 and 98	- Lack of freedom of association - Ineffective freedom of association - Trade union rights	Own workforce Supply chain (Tier 1) Supply chain (sub-suppliers)	P A A	  	Direct Linked Linked
Right to strike in conformity with national laws ICESCR article 8	Inability to strike	Supply chain (Tier 1) Supply chain (sub-suppliers)	A A	 	Linked Linked
Freedom of thought, conscience and religion UDHR article 18 ICCPR article 18	Discrimination on the basis of thought, conscience and religion	Supply chain (Tier 1) Supply chain (sub-suppliers)	P P	 	Linked Linked
Freedom of opinion and expression, including freedom to seek information. UDHR article 19 ICCPR article 19	- Inability to express freely and safely opinions. - Inability to seek information	Supply chain (Tier 1) Supply chain (sub-suppliers)	A A	 	Linked Linked

Risk Assessment Results

Possible Human Rights Affected	Actual or Potential Risks	Potentially affected rightsholders	Actual or Potential	Score	Relationship
Right to freedom of assembly and association UDHR article 20 ICCPR article 21 and 22	Punishment for conducting meetings related to work and association	Supply chain (Tier 1)	A	●	Linked
		Supply chain (sub-suppliers)	A	●	Linked

The following parameters have been applied for the evaluation criteria to obtain the risk score[1]:

Likelihood:

Low: Context suggests possible to happen, but effective mitigation measures are in place

Medium: Context suggests possible to happen, and no/ineffective mitigation measures are in place

High: Context suggests likely to happen, and no/ineffective mitigation measures are in place

Severity:

Low: Minor effect on quality of life for those impacted, easily remediated.

Medium: Substantial effect on quality of life for those impacted, not easily remediable.

High: Severe effect on quality of life for those impacted, not fully remediable.

Very High: Catastrophic effect on quality of life for those impacted, not remediable.



[1] Based on Twentyfifty Ltd training on Human Rights Due Diligence.

Relationship:

- **Direct Cause:** Impact is caused directly by BRIGHT's actions. If BRIGHT ceases the action, the impact will cease too.
- **Contribute:** BRIGHT does not alone cause the impact. However, BRIGHT's actions encourage, enable or motivate human rights harm by or with another.
- **Linked to:** Impact is caused by another entity with whom the company has a business relationship. BRIGHT's actions do not appear to encourage, enable or motivate the impact.



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Cease, Prevent & Mitigate Adverse Impacts

BRIGHT approaches adverse human rights impacts with the understanding that effective action depends on clear prioritization and structured follow-through. All identified risks are recorded in our internal risk-management system, which triggers formal procedures to address, mitigate, or monitor them based on their severity, likelihood and relationship to BRIGHT's operations. In 2025–2026, no risks were identified that required immediate cessation or mitigation.

Systemic Issues

Some of the most significant human rights risks identified through BRIGHT's due diligence relate to structural or systemic issues beyond the direct control of any single actor [2].

These include restrictions on labour rights and freedom of expression in manufacturing geographies, gender inequality in supply chain roles, and risks associated with raw material sourcing in the electronics sector.

While BRIGHT does not directly cause or contribute to these issues, we recognize the responsibility to use our leverage to address them to the extent possible.

In 2025, we actively participated in dialogue with suppliers and supported transparency efforts through audits, and on-site visits. We also remain alert to global developments in solar panel traceability and forced labour risks..

As a small enterprise, BRIGHT acknowledges the limitations of its influence but remains committed to aligning with international expectations and pursuing collective action where feasible.

[2] OECD, OECD Due Diligence Guidance for Responsible Business Conduct (31 May 2018), 74

Track Implementation & Results

In 2025–2026, BRIGHT continued to monitor the effectiveness of its mitigation actions through a reassessment of risks within our internal management system. As part of our ongoing commitment to strengthening this process, we transitioned to a new dedicated tracking system this reporting cycle. The purpose of this system is to give us a clearer, more structured overview of how identified risks evolve from year to year, making it easier to spot emerging trends and compare assessments across cycles.

Third-Party Audit Follow-Up

BRIGHT also monitors the implementation of findings from third-party audits. This year, we are pleased to report that all previously identified corrective actions had been successfully addressed by the supplier. The issues flagged in the audit related to workers wearing jewelry in areas where this poses a safety risk,

instances of registered overtime, and the need for improved personal protective equipment (PPE) at the soldering station. All three areas were resolved satisfactorily, which reflects our supplier's commitment to continuous improvement and responsible working conditions.

“Initially, we tracked human rights risks within the same system used to monitor other risks in accordance with our ISO standards. However, the complexity of human rights risks necessitated a more specialised overview. This has enabled us to better analyse the risks for different rights holders and compare potential mitigation measures.”

**Head of Humanitarian Partnerships,
Lorena Muñoz Carmona**

Communicate

Transparent communication is a core element of BRIGHT's due diligence approach. We publish this report annually by June 30 and are committed to responding to all information requests in line with the Transparency Act's legal requirements and timelines.

No requests for information were received during the reporting period.

Where to find this report

This report is published annually and made publicly available through the following channels:

BRIGHT's website: bright-products.com

LinkedIn: via BRIGHT's official [LinkedIn page](#)

How to contact us and submit information requests

Any individual or organisation wishing to request information about BRIGHT's human rights due diligence work, or raise a concern, is encouraged to reach out through the following channels:

Email: transparency@bright-products.com

Post: BRIGHT Products, Holbergs gate 19, 0166 Oslo, Norway

Website: bright-products.com

In line with the Transparency Act (Section 7), we aim to respond to all requests within three weeks of receipt. For particularly complex or resource-intensive requests, we will respond within two months, while ensuring clear communication throughout.

Provision & Cooperation in Remediation

BRIGHT is committed to upholding the right to access remedy as set out in the UN Guiding Principles on Business and Human Rights. If BRIGHT causes or contributes to an adverse human rights impact, we take that responsibility seriously and respond with transparency, care, and fairness. Any concern, whether raised by an employee, supplier, or affected community member, can be submitted through our designated channels.



All reports are treated confidentially, and no retaliation will be taken against those who raise concerns in good faith.

Concerns can be raised via email at transparency@bright-products.com, by post to our Oslo office, or through our website. Once received, concerns are reviewed by our designated human rights risk manager, who will engage with affected stakeholders, investigate, and implement any necessary measures.

No grievances were received during the reporting period

Summary

This reporting cycle reflects BRIGHT's continued commitment to embedding human rights into our operations and supply chain, not as a compliance exercise, but as a genuine business practice. We have strengthened our methodology, deepened our supplier relationships through on-site visits, and successfully followed up on third-party audit findings.

While no risks requiring immediate action were identified, we remain vigilant and committed to continuously improving our processes, because we know that meaningful due diligence requires ongoing learning, self-assessment, and engagement with those our work touches



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