TRANSPARENCY ACT REPORT

1. Introduction

T1 Energy Norway AS (f/k/a FREYR Battery Norway AS) and T1 Energy Giga Arctic AS (f/k/a FREYR Battery Giga Arctic AS) (together, "T1N") are subsidiaries of T1 Energy Inc. ("T1 Energy" or "T1") (NYSE: TE) In December 2024, T1 completed a transformative transaction, positioning the Company as one of the leading solar manufacturing companies in the United States, with a complementary solar and battery storage strategy. Based in the United States, T1 Energy is exploring value optimization opportunities across its portfolio of assets in Europe.

This report covers T1N's assessments and due diligence activities under the Norwegian Transparency Act (the "Transparency Act") for the fiscal year 2025, covering the period from 1 January to 31 December 2025.

During this period, T1N's principal activities in Norway focused on the wind-down of its European operations and the European Portfolio Optimization (the "EPO") process, under the oversight of T1's board of directors.

The EPO process included the management, maintenance, and value optimization of the Giga Arctic building ("Giga Arctic") and Customer Qualification Plant (the "CQP") in Mo i Rana, as well as the Vaasa Plot in Finland. A key priority was securing grid capacity for the Giga Arctic asset, recognizing its importance as a critical enabler for future development and activities.

In addition, T1N maintained a strong focus on fulfilling ongoing contractual obligations and strengthening regional and national stakeholder relationships. At the same time, T1 Energy continued to pursue strategic development opportunities for Giga Arctic and the CQP, including its potential use as a data center and AI infrastructure hub.

2. Governance, policies and procedures

The responsibility for T1N's compliance with the Transparency Act rests ultimately with its board of directors (the "Board"). Day-to-day responsibility for human rights and working conditions is delegated to T1N's executive management, which reports to the Board on material findings and risks. Given the wind-down of T1N's Norwegian operations during 2025, the number of personnel with active roles in this work has been limited accordingly.

T1N is committed to respecting internationally recognized human rights and labor standards, as outlined in our Code of Business Conduct and Ethics.

3. Due diligence activities

Risk and impact assessments

We have several measures to assess actual and potential adverse impacts in our own operations, our supply chain, and among our other business partners. Below is a summary of our key activities.

Own operations

During 2025, T1N's operations in Norway were principally limited to the management and maintenance of the Giga Arctic building and the CQP. T1N assessed and monitored working conditions through regular dialogue with employees and employee representatives. Key indicators included sick leave, turnover, and workplace incidents. No significant adverse impacts were identified during the reporting period.

T1N complies with applicable Norwegian anti-discrimination and working environment legislation. Recruitment, remuneration, and career development decisions are based on objective, job-related criteria. Employees are made aware of T1N's policies through onboarding and relevant training and are encouraged to raise concerns through employee representatives or the company's whistleblower channel.

Supplier due diligence process

The majority of the material supplier base in 2025 consisted of suppliers and service providers that had already been onboarded and were well known to T1. A very limited number of new suppliers were onboarded during the year in accordance with T1's corporate procedures.

When onboarding new suppliers, Environmental, social, and governance ("ESG") risk assessments are conducted. Due diligence measures include supplier prequalification and procurement audits, contractual commitments to labor and human rights standards, and the implementation of corrective action plans based on regular audits and performance reviews.

As operational activity remained limited throughout the year, management maintained close oversight of all suppliers. Follow-up activities included regular meetings, continuous dialogue, and monitoring of agreed action plans, with clearly defined responsibilities and interfaces to ensure effective implementation and accountability.

Operational risk management

Our operational preparedness plan includes:

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

Community and stakeholder engagement

Through one-on-one meetings and presentations with political representatives and other decision-makers and influential persons across the Mo i Rana community and the regional and national arenas, engagement with a range of associations relevant to T1's core priorities, targeted communications, and media engagement trough commentary, chronicles, and news articles at the local and national levels, T1 continuous to build and maintain the support needed to strategically develop the Giga Arctic site and its other assets.

We maintain active dialogue with relevant unions and align ourselves with industry through MIP (Mo Industrial Park) and the Arctic Cluster Team (an industrial cluster in Northern Norway) as well as the Norwegian data center industry association (NDI). Stakeholder feedback informs ongoing risk management efforts. T1N continued this dialogue during the wind-down period to ensure that the interests of remaining employees were properly considered. Community engagement in Mo i Rana was maintained throughout 2025.

Tracking and monitoring

We track and monitor our activities regularly to ensure they are adequate and effective. Key tools include the operational preparedness plan action list, performance indicators (e.g., competence levels, retention, HSE metrics) and executive-level ESG risk reviews. Given the reduced operational scope in 2025, the frequency of formal ESG risk reviews was adjusted to reflect the level of activity.

Grievance mechanisms and remedies

T1N have established systems for reporting grievances. No grievances related to human rights or decent working conditions were received through T1N's formal channels during the reporting period. The channel remains available to employees, contractors, and external parties.

4. Findings and risk areas

Maintenance phase: Risks include poor working conditions, particularly among foreign and migrant contract workers. Measures in place include strict HSE protocols, compliance requirements, and audits.

Supply chain risk: When T1N maps suppliers and countries of origin, a risk-based approach to engagement and audits is applied.

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

We will continue to assess and monitor actual and potential adverse impacts of our ongoing business activities in Norway and adjust our efforts accordingly.

This report has been approved by the board of directors of T1 Energy Norway AS and T1 Energy Giga Arctic AS.

[Place and date]

6/29/2026 Place:Austin, Texas, USA

Signed by:
Evan Calio
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Evan Calio
Chair of the Board

6/25/2026 Place: Oslo

Signed by:
Andreas Bentzen
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Andreas Bentzen
Director of the Board