

Statement related to the Transparency Act

Introduction and purpose of the Act

The Transparency Act enters/entered into force on 1 July 2022. The Transparency Act can be found here:

- In English: <https://lovdata.no/dokument/NLE/lov/2021-06-18-99>
- In Norwegian: <https://lovdata.no/dokument/NL/lov/2021-06-18-99>

The purpose of the Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. Further, the Act ensures the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The Act builds on international procedure and consensus about the requirements for responsible business conduct as well as Norwegian traditions of transparency and access to information. Together with other measures, the legal requirement shall contribute to Norway's work to meet and comply with the UN's Sustainable Development Goal no. 8 on decent work and economic growth, as well as goal no. 12 on responsible consumption and production. The core of the law entails the duty to perform and account for human rights due diligence assessments. Human rights due diligence assessments mean that companies must identify possible negative consequences for basic human rights and decent working conditions related to production and supply chains, implement improvement measures, follow up and report.

About NetNordic

NetNordic is a system integrator delivering managed and professional services and solutions to medium and large sized companies within both the private and public sector to customers headquartered in the Nordic region. NetNordic is building and managing IT-Solutions for the future, focusing on important customer verticals and strong local regional presence within the business areas Network, Collaboration and Security. The goal is to be the most trusted partner within leading end-to-end digital enablement and multi cloud & application, in the Nordic region. We want to help our customers with their digital journey through the design, delivery and management of next generation IT-services and solutions. By using market-leading technology, together with our competent advisors and highly certified IT consultants, NetNordic can help its customers to reach their business goals.

NetNordic – Our Commitment

NetNordic Group AS and its subsidiaries (The Company) are committed to comply with all applicable laws and regulations in accordance with our Code of Conduct and underlying procedures. The Company opposes modern slavery and any form of human right's violations, including indecent working conditions associated with the Company's supply chains, as also enshrined in our Code of Conduct.

The Company has defined a Procedure ("**The Procedure**") to provide guidance and instructions on the Company's compliance and commitment to the act relating to enterprises' transparency and work on fundamental human rights and decent working conditions ("**The Transparency Act**" or "**The Act**", NO: Åpenhetsloven).

The Procedure applies to the Company's subsidiaries and their employees worldwide. The Company shall use its best efforts to ensure that the Procedure, or procedures that set out the same standards with respect to supply chain management, are implemented in its majority owned companies.

The Procedure will not purport to be all-inclusive, and it is expected that all Company employees that are involved in processes directly or indirectly linked to the requirements of the Transparency Act use their own sound judgement. Thus, the Company will commit to conduct training of all relevant employees.

The Company will commit to conduct due diligence of suppliers and other business partners under the Act. Such due diligence will be conducted on a regular basis and be risk based, proportionate and in accordance with UN's Guiding Principles for Business and Human Rights and the OECD Procedure for Multinational Enterprises.

The due diligence shall comprise the Company's suppliers (and their sub-suppliers) and other business partners that supply goods or services directly to the Company (that is not part of the supply chain). The requirements under the Act and the available risk mitigating tools will, however, be different for the Company's suppliers and sub-suppliers.

Direct purchases from suppliers that entail an inherent risk of human rights and labour abuses, require a more pro-active and cautious approach from the Company in terms of background checks and follow-up measures, such as audits. When sourcing indirectly through (lower risk) suppliers that may have high-risk suppliers in their supply chain, the main mitigating tool is to address the Company's expectations to the supplier through an agreement. Such agreement should include obligations for the supplier to address, mitigate and report on human rights and labour rights risks in the supplier's supply chain.

Examples of relevant risks that the Company should identify and mitigate under the Transparency Act are:

Child labour, discrimination, sexual harassment, and violence against women, forced labour, occupational health and safety (e.g., worker related injury and ill health), violations of the right of workers to establish or join a trade union and to bargain collectively, non-compliance with minimum wage and the use of hazardous chemicals.

For the purposes of the Transparency Act, the Company's due diligence commitments mean to:

- a) Embed responsible business conduct into the Company's policies.
The Company's Board sets the overall "tone from the top" and has the overall responsibility to ensure that the Company has in place adequate measures in relation to responsible business conduct. The Company's CEO is responsible for the day-to-day implementation of such measures. Thus, business ethics is a Board and management responsibility in the Company. Social sustainability and human rights are embedded in the Company's framework for responsible business.
- b) Identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed toward (or that are directly linked with the enterprise's operations, products or services via the supply chain or business partners)
- c) Implement suitable measures to cease, prevent or mitigate adverse impacts based on the Company's prioritizations and assessments pursuant to (b)

NetNordic – What we do

The Company has and will continue to implement several preventive and mitigating measures in the supply chain. During 2023 the company has improved its routines to ensure compliance with the law, including:

- I. New onboarding procedure of new suppliers including background checks of medium and high-risk suppliers with subsequent follow-up actions and dialogue with suppliers
- II. Ensure that new supplier contracts contain sufficient compliance clauses, including the company's expectations of the suppliers' working conditions and compliance program, the duty to inform about breaches and the company's right to carry out audits
- III. Created the "Supplier Code of Conduct" as an appendix to supplier contracts that ensures the suppliers' obligation to comply with the company's ethical guidelines
- IV. Regular risk assessment and audit of existing suppliers

All employees in the Company, directly involved in purchasing goods, have been introduced to the new onboarding procedure of new suppliers as well as supplier code of conduct and standard compliance clauses.

The Company conducts annual employee surveys in which one of the targets is to identify breaches of the company's ethical guidelines including fraud, human rights and working

conditions. During 2024, the company will continue the training of all employees to ensure adequate awareness and knowledge of our ethical principles including human rights.

Several businesses omit or have insufficient descriptions of what discoveries they have made and significant risks that have been uncovered. If nothing has been uncovered during the due diligence assessments, it should appear in the report to show that the business has actually carried out the assessments. For several businesses, it may be the case that no actual negative consequences are uncovered, but that the business is nevertheless exposed to significant risk, e.g. in the supply chain. In such cases, it is important that these risks are disclosed.

The core of the law entails the duty to perform and account for human rights due diligence assessments. Human rights due diligence assessments mean that companies must identify possible negative consequences for basic human rights and decent working conditions related to production and supply chains, implement improvement measures, follow up and report.

The Company has not identified any significant risks of negative consequences for basic human rights and decent working conditions related to its supply chain in its assessments, audits and employee surveys conducted in 2023.

Lysaker, June 27th 2024

Christian Sontum
Chair

Tom A. Solberg
Board member

Marina Lønning
Board member

Erik Heilborn
Board member

Petri Kairinen
Board member

Jarl Øverby
Group CEO

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