

ESG REPORT

— — — 2022

data respons
part of **AKKODiS**

EXECUTIVE SUMMARY FOR 2022

EBITA¹

NOK 326 million
(277 in 2021)
EBITA margin of 13%

1664

EMPLOYEES
(1551 in 2021),
including subcontractors

14.5%

TURNOVER
(14,1% in 2021)

REVENUE

NOK 2 506 million
growth of 18%
(2 117 min 2021)

CARBON EMISSIONS

2 271 TONS
(4 815 tons in 2021)

3,5%

SICK LEAVE
(5,9% in 2021)

DIVERSITY

22%

WOMEN

(21% in 2021)

26%

WOMEN IN
MANAGEMENT
(32% in 2021)

60

NATIONALITIES

42

AVERAGE
AGE



SYLOG



data respons
SOLUTIONS

IT SONIX

epos

DONAT IT

TechPeople



MESSAGE FROM CEO



It is a great pleasure to see that 2022 turned out to be yet another all-time high financial year for Data Respons.

18% revenue growth, NOK 2.5 billion in turnover and double-digit operating profit, once again proves that our operating model, strategy, and specialist positioning works.

CEO, Kenneth Ragnvaldsen

Three horizontal bars in teal, magenta, and blue colors.

ESG

REPORT 2022 – CEO LETTER

It is a great pleasure to see that 2022 turned out to be yet another all-time high financial year for Data Respons, an Akkodis company. 18% revenue growth, NOK 2.5 billion in turnover and double-digit operating profit, once again proves that our operating model, strategy, and specialist positioning works.

Sustainability through technology is really starting to pay off

Whilst I am happy with our financial performance, I am sincerely delighted by our sustainability performance. We have reduced our carbon footprint by more than 70 percent since 2019. This is especially impressive in a year where we managed to successfully grow the company by 200 new people, who have been well integrated into our family.

But what is of equal satisfaction, is the fact that our continuous focus on supporting our customers with sustainability-oriented projects, really pays off. Not only have we strengthened our positioning within renewable energy. We have also contributed significantly within industries such as Automotive & Transportation and Industry & Automation to enable the transition to a sustainable future through technology development.

Combining customer satisfaction with the ability to deliver profitable growth whilst contributing to making the world greener, more resilient, smarter and more equal is meaningful to both customers, partners and the rest of the team at Data Respons.

A competitive and relevant strategy

Our company is involved in key technology trends that changes the game across all industries. In 2022, our business continued to power on, and many projects were fueled by a strategic understanding that digitalization, connectivity, and sustainability is the key to stay competitive. Every year, we aim to deliver a minimum of 100 projects that have valuable effects on the SDGs. We believe in sustainability through technology. In 2022, we have again delivered numerous projects that deliver positive impact. For instance, one of our specialist teams have strongly supported the electrification of the mobility sector. Our specialists have integrated hybrid drivetrains and charging capabilities into numerous of vehicle types.

In our Swedish operations we have also moved into a new territory, the electric boat industry. The dedicated team are designing a complete wire harness for a new high-end electric luxury cruiser on hydrofoils. Being a part of the push towards sustainability in mobility is important to us, and we are continuously looking to expand our portfolio in that area.

Reducing our emissions.

In this report, we also get the chance to review our own vulnerabilities, actions, and achievements. One of our goals is to become carbon neutral by 2025. Since 2019 we have reduced our emissions from around 9300 tons to about 2660 tons CO₂. An achievement I could not be prouder of.

However, we acknowledge that after switching to renewable energy, reducing travels and switching to hybrid cars, we must work with new technological solutions to continue the journey towards becoming carbon neutral. Put differently, we are pretty sure that the toughest reductions are still ahead of us.

Equal pay for work of equal value

We have a pronounced focus on gender equality, and in 2022, we continued our work towards more diversity among our leaders. For the last three years we have managed to increase the number of female leaders. But this year we adopted a stricter approach to our definition of a leader, and we got a decline in the number of female leaders. However, every year for the last three years we have managed to increase the number of women in our company, and 2022 was not an exception.

However, it is not enough to map the number of women. Making sure men and women are getting the same pay for the same job is just as important. Long story short, our mapping shows everyone is treated fairly, and young female engineers are in fact marginally better paid than their male peers. Gender balance will remain a key focus area in the coming years.

Gunning for our moon-shot ambitions

Since we launched our ambition in 2019 to become carbon neutral by 2025, we have reduced our carbon footprint by 70%. At the same time, we have managed to increase the number of women in the company. And we have produced more guidelines, policies and documents than ever before. We have proven that moon shots are not impossible, but that they are challenging and rewarding.

All in all, 2022 was our best year so far in the company's history, and with that, the benchmark for 2023 is set.

ABOUT THIS REPORT



This report covers the ESG performance of Data Respons on a group level, and the management approach to Data Respons' material ESG issues.

Qualitative and quantitative data in the report predominantly comes from Data Respons' business segments, R&D Services and Solutions, which constitute all the software and hardware development in the company.

Data Respons' carbon mapping has been externally assured by Cemsys.

The ESG report has not been reviewed by a third party.

This is Data Respons' fourth comprehensive ESG-report, covering the fiscal year 2022.

The report has been prepared in line with EU directives on mandatory annual disclosures of non-financial information. It is inspired by the GRI framework for sustainability reporting.



We are very much still on a learning curve when it comes to ESG reporting. But every year we understand our footprint a bit better. And it's a rewarding process.



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SUSTAINABILITY THROUGH TECHNOLOGY



ESG is important to us for several reasons. We believe in our ability to impact sustainability through technology. We have unique possibilities to support and enable solutions and services that saves resources, reduces emissions, and create better quality of life. Sustainability is, and will remain crucial for our growth, and that is why we seek to improve our work within environmental, social and governance dimensions.

Why it matters to us

Climate change is accelerating, becoming more intense and some of the trends are now irreversible according to the UN Climate Panel (IPCC). As an international organization, Data Respons takes this seriously and has therefore communicated that by 2025 we will be net-zero.

Despite the obvious need to support the science-based targets, our engagement for ESG matters also supports two of our values: Being generous and taking responsibility. Our ambition is to integrate ESG in our daily work, both to increase competitiveness, as well as meeting customer and employee demands.

SUSTAINABILITY ACHIEVEMENTS IN 2022

While we still have a long way to go regarding the global challenges we face, it is important to applaud the actions we take along the way. Here are some of our sustainability achievements from this year:

- In September we arranged an ESG summit where we gathered our sustainability ambassadors from all subsidiary companies. During the summit we shared knowledge, best practices, lessons learned and discussed future steps for the Data Respons Group.
- We launched an internal learning program called “The Data Respons ESG Crash Course” on group level on environmental, social, and governance matters. This was an effort to strengthen the commitment to sustainability by increasing knowledge and awareness. The participation rate was relatively low, and we plan to run it again in 2023.
- Together with Circular Norway, Data Respons subsidiary Data Respons Solutions held two workshops with emphasis on the benefits of converting to a circular economy and of circular business models. In addition, management was introduced to understanding linear risk, circular trends in Norway and Europe, qualitative and quantitative indicators, as well as knowledge of how the business can be restructured in an efficient manner.
- To compensate greenhouse gas emissions and support action to climate change, we purchase carbon credits when our employees travel through a carbon offsetting platform.
- Conforming with the rules of the Transparency Act, we conducted a supply chain due diligence for all subsidiary companies to identify suppliers with risk to people and planet through Integrity Next. The account of the due diligence can be found in this report.

- The number of subsidiaries that has switched to guaranteed renewable energy increased in 2022 and is now 8.
- In November we arranged the Data Respons Hackathon in Munich where 30 talents from across the group spent 24 hours hacking Green IT in teams. One of the teams created a more energy efficient way of coding.
- We reduced the number of fossil fuels cars in all subsidiary companies.
- On selected sites in Germany, we installed solar panels to power servers.
- In Sweden we conducted a pilot study where we mapped the carbon footprint on all office supplies. The mapping was done to drive and inspire all to adopt policies to combat global warming.
- “Hacking performance” is a campaign to reduce both physical and mental illness across our subsidiary companies. Our goal is to make exercise a regular part of the working day. We have several company sport teams, arrange spinning and paddle classes and encourage employees to be active.



Lessons learned. Sharing is caring

Reporting emissions is not an easy fix, especially when the ambition is to map all direct and indirect emissions. That being said, it is the only way to fully understand our carbon footprint. Every year we work to improve our methods and processes for collecting and reporting data.

We are prepared to work beyond our own companies to prepare for the challenges we are meeting ahead. That's why we are spending time and resources on our internal sustainability ambassadors. By developing the right skill sets we can intensify our sustainability efforts.

GOALS & AMBITIONS 2022

Topics in this chapter:

- Goals and ambitions within ESG
- Key ESG highlights 2022

GOALS & AMBITIONS WITHIN ESG

40%

**Women in the
management by 2025**
(long term goal is 50%)

2025

**Reach CO₂-
neutrality**

2023

**Sustainability conduct
audits at largest
suppliers in Taiwan**

25%

**Women in the
total workforce
by 2025**
(long term goal is 50%)

Environmental

- Deliver a minimum of 100 sustainable projects
- Change energy supplier to renewable sources for all subsidiaries
- Continue implementing our sustainability strategy across the group
- Expand our circular economy projects to more clients

Social

- Increase the gender balance up to 25% women
- Leverage exchange opportunities within Data Respons and Akkodis
- Continue to strengthen a culture that creates an international and attractive work environment and our recruiting efforts in 2023
- Ramp up efforts to promote physical activity and reduce sick leave
- Reach a participation rate of 50 % on our internal learning program, "The Data Respons ESG Crash Course"

Governance

- Follow up our letter to all suppliers regarding more sustainable products and services through a survey
- Conduct sustainability physical audits at largest suppliers in Taiwan during 2023
- Publish a Transparency Act Due Diligence report according OECD guidelines by June 30, 2023
- Revise the Code of Conduct
- Create a Human Rights Policy
- Revise the Supplier Conduct Principles
- Get the revised Supplier Conduct Principles signed by our customers
- Launch an internal ESG E-learning program on human rights
- Explore Human Rights E-learning Course with Amnesty for all employees
- Grievance mechanisms / whistle-blower portal visible on the group's compliance webpage

KEY ACTION POINTS AT DATA RESPONS IN 2022



These are key actions identified to be able to deliver on our long-term ambitions.

Key ESG Highlights 2022

Environmental

- Created actions plans for every daughter company on how to become CO₂ neutral by 2025 at the ESG summit in Oslo.
- Held two circular economy workshops
- Let every employee compensate for greenhouse gas emissions through a carbon offsetting platform
- Increased the number of locations using guaranteed renewable electricity
- We reduced the number of fossil fuels cars in all subsidiary companies
- On selected sites in Germany, we installed solar panels to power servers
- Started a Circular Economy training program

Social

- Launched an internal learning program on group level on environmental, social, and governance matters.
- Arranged a Data Respons Hackaton
- Continued a learning program on mental and physical health

Governance

- Conducted a supply chain due diligence
- Revised the company Code of Conduct
- Created a HSE Policy
- Responsible business conduct and routines to safeguard responsible business conduct has been adopted in Data Respons' Board and in the boards of owned companies that are compliant in their own right
- Delivered a statement on equality and non-discrimination (ARP)

Reshaping our business

Roadmap to 2025 and 2030

2020

Completing Scope 3 mapping across the group.

2021

Setting the strategy to reach carbon neutrality
Acquiring necessary tools
Shifting to renewable energy supply

2022

Working to change the energy supply for production in Taiwan
Working with our customers to prioritize maritime transport instead of air transport

2023

Establish circular customer demos.
Ensure that all offices are use green electricity and that all company cars are hybrid or EV.

2024

Expand circular business models to more clients


2025

Become carbon neutral in our R&D and software focused business units.
Offsetting emissions we are unable to reduce or cut

2030

Become a net zero business, by also becoming carbon neutral in our Solutions orientated business

TECHNOLOGY THAT MAKES A DIFFERENCE



- UN Global Compact Membership
- UN SDG's and Data Respons Deliverables

THE UN GLOBAL COMPACT

We support the UN Global Compact and conduct our business in line with the ten principles related to human rights, labor standards, environment and anti-corruption.

We also align our efforts with the UN Sustainable Development Goals and our company values; taking responsibility, to perform, to be generous and having fun. We will continue to conduct our business in line with the ten principles related to human rights, labor standards, environment and anti-corruption.

Data Respons' Communication on Progress 2022 is available on UN Global Compact website. It is updated on a yearly basis, and available here:

<https://unglobalcompact.org/what-is-gc/participants/134406-Data-Respons-ASA>



United Nations
Global Compact




The Global Sustainable Development Goals (SDGs)



The UN Sustainable Development Goals were adopted by all the world's governments at the United Nations in 2015 and provide a common and necessary roadmap.

At Data Respons, we celebrate these goals and believe in making a difference from the inside; inside technology and inside our subsidiary companies. We strive to explore technology projects contributing to a more sustainable world, especially those making the world greener, stronger, smarter and more equal.





INCREASING NUMBER OF SUSTAINABLE TECHNOLOGY PROJECTS

We believe technology development is vital to enable a sustainable future! Data Respons has set goals to aim for more than 100 technology projects yearly that contribute to a more sustainable world, especially those making the world greener, resilient, smarter and more equal.

Ambitions

As we increasingly work on projects with a sustainability edge to them and as our company grows in size, it's natural that we increase our ambitions. We aim to deliver a minimum of 100 projects that have valuable effects on the SDGs by 2022.

Execution

Sustainability has been an integrated part of our strategy for years. However, we have not managed to integrate sustainability in our day- to-day business to a satisfactory level. We are now working to visualize carbon cost in our customer contracts and employ eco design as a natural step in the product cycle.

Alignment with UN Sustainable Development Goal

Data Respons is agnostic when it comes to the SDG's. But we have identified 5 goals with respective, specific targets where we believe we have the biggest impact through our current business projects.



Ensure access to affordable, reliable, sustainable and modern energy for all

- 7.1 By 2030, ensure universal access to affordable, reliable and modern energy services
- 7.2 By 2030, increase substantially the share of renewable energy in the global energy mix



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

- 8.2 Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labor-intensive sectors



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

- 9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all
- 9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities



Ensure sustainable consumption and production patterns

- 12.2 By 2030, achieve the sustainable management and efficient use of natural resources
- 12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle



Take urgent action to combat climate change and its impacts

- 13.2 Integrate climate change measures into national policies, strategies and planning



IT Sonix: Enabling easy access and distribution of renewable energy

In multiple projects, IT Sonix is enabling easy access to and distribution of renewable energy for private customers.

Through an energy trading platform, even small-scale energy providers can easily sell their excess energy. This is done in the best possible way, at the correct market price, and without any delay.

In another similar project, landowners can publish a proposal for a solar power plant, describing the conditions and environment of their property. Individual offers can then be made to build the solar power in the area. This also works as a bridge to the open energy market.

Landowners can buy their excess energy back later at a lower price, or use it in e.g., their vacation homes. This lowers the bar for an increasing amount of people to become providers of renewable energy.



IT Sonix: Digitizing and simplifying previously analogue processes

There is a huge potential in digitizing and simplifying previously analogue processes, especially on construction sites.

In this project the digital documentation of construction progresses (construction plans, measures, etc.) is being pushed forward, and thus work is being done on the paperless construction site.

It is not only the work on site that is being simplified. Other processes are also being centralized and digitalized. For example, it is no longer necessary to maintain papers with signatures, to print out plans for different people to view and edit, or to have all the trades live time delayed.

All these issues are combined, accelerated, and simplified.



EPOS CAT GmbH: Online Q&A-System

The Online Q&A-System can be used in annual press conferences which are held as hybrid events. The system eliminates the need for journalists to travel from all over the world, which reduces emissions, and saves resources.



inContext AB: Harness design for battery powered vehicles

This year, inContext worked with cable harness design for a resort vehicle project. The team made schematic design for an installation of a new battery pack and a new battery management system.

The battery powered vehicles will eventually replace oil-based vehicles which are currently in place. This will result in reduction of emissions.



inContext AB: Smart Substation design

inContext is helping a customer with smart substation design. This involves routing of all the high voltage cables and positioning of the high voltage equipment in substations.

The work is proceeded in CAD-tool Siemens NX. The new transition will bring enormous change in the way the substations are being utilized as of today. They will be more efficient, resulting in a reduction of faults related to substation.



EPOS CAT GmbH: LLV/ Logster, price control and monitoring

LLV enables the precise control and monitoring of special container suppliers based on fixed (delivery lot) specifications. In other words, the web application supports the use of available storage in an optimal way.

This web application can be used to avoid both the unnecessary occupation of storage space due to over-deliveries and production downtimes and additional costs caused by under-deliveries.

The main purpose of LOGSTER is assistance in logistics planning, as well as integration of huge amounts of data via interfaces. Logistic data is gathered on a daily basis.



inContext AB: Industrialization phase for full scale production of electric boats

inContext helped a customer in the industrialization phase of making an electric boat ready for full scale production. The boats cause zero pollution in when it is out at sea.

The all-electric powered boats are changing the boat industry contributing to a fossil free tomorrow.





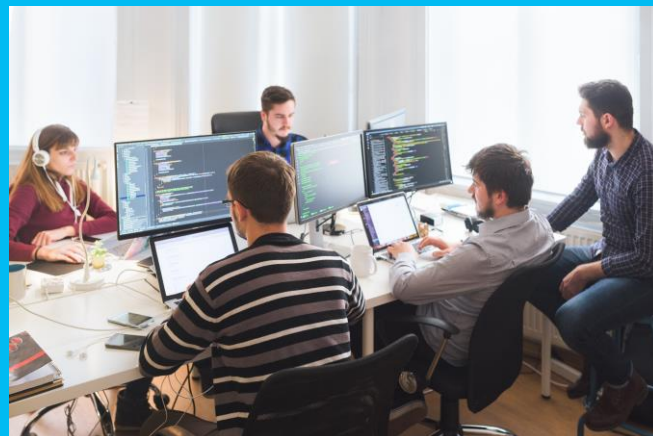
DONAT IT: EVx EPM / Test Plan

This year, Donat IT worked on project where they minimized the number of test vehicles and improved of the planning processes.

EVx is a modular software to support the planning, ordering, management, and use of test vehicles within the technical development of AUDI AG.

“Test Plan” is a component for calculating and optimizing test plans. When connecting the Audi Test Plan to the module EPM of EVx, sustainable use is achieved through optimal utilization of test cases. This applies for the entire life cycle of the test vehicle. In addition, the need for test vehicles is optimally calculated through the software, meaning that only a minimum of test vehicles are produced. CO₂-emissions are reduced as we optimize the transport of test vehicles in the test procedure.

Optimization of the time and personnel expenditure is also achieved, which again increase efficiency. Last, the creation of an improved basis for decision-making makes the entire planning processes more efficient.



Sylog Väst AB: Software development

A team of consultants from Sylog are working with software development of a product called SAFE Platform. This product is delivered and deployed in several police districts in UK, making the police constables work more efficient. At the same time, the platform creates a safer society for the people living in the area.

With its multi-role capability and intuitive workflow-driven user interface, SAFE will be employed extensively throughout the police force for all public contact including 999 and 101 calls, incident management, communications management and resource deployment.

Sylog is providing expertise within development, software architecture and Product Ownership enabling the products to be developed, integrated and rolled out in a successful manor. By enabling a system to help the community feel safer and enabling emergency services to respond quicker, this project is contributing to building a resilient infrastructure.



Sylog Stockholm AB & Sylog Väst AB: Solutions to optimize energy efficiency and reduce fuel consumption

Together with the client, Sylog Stockholm AB & Sylog Väst AB develop solutions to optimize energy efficiency and reduce fuel consumption. The project creates solutions that reduce the CO₂ footprint from the products.

Sylog is providing expertise within development, enabling the products to be developed, integrated and rolled out in a successful manor.

By enabling autonomous vehicles, new means of transport and construction are being worked upon and infrastructure becomes more resilient. By reducing fossil emissions, air quality can improve, which provides a better environment for human populations.



MicroDoc Computersysteme GmbH: Controlling and monitoring solar panel equipment and battery storage

To combine solar panels and modern battery storage, one of our customers provides a compact and holistic solution for households. MicroDoc supports the customer by providing experts to develop protocol implementations and service orchestrations for controlling and monitoring solar panel equipment and battery storage for the V4 Smart home solution.

The solution is based on our previous work on the EnBW energyBase.

This contributes to increasing the share of renewable energy in the global energy mix.



MicroDoc Computersysteme GmbH: Hybrid micro-inverter (600/800 Wp) with battery storage

For optimal use of self-generated electricity through battery storage and energy consumed from power grid, bidirectional power flow in the household is monitored. Based on this monitoring, the combination of variable electricity tariffs and own energy storage is optimized in a sense that the system automatically choose the cheapest provider or even postpone energy usage from the power grid by temporarily switch to the battery storage.

This contributes to affordable, reliable, and modern energy services for all.



Data Respons R&D Services AS: Designing Electric Vehicle Charging System with load balancing

In cooperation with our customer, we have made a completely new charger with HW and SW, while a new back-end and front-end is also in scope. The project has been ongoing for several years and is now finally ready for sale.

Last year we also designed a device for sensing the total current limit for a circuit. This is for controlling and utilizing the EV chargers load to the maximum available power given the household or charging hub.



Data Respons R&D Services AS: Next generation flame- and contact-free heating of metal

Next generation flame- and contact-free heating of metal. This can be used for welding of pipes, soldering of mixer taps, hardening of metal and removing of paint from metal, among other things. The process is much more energy efficient than other heating methods.



Data Respons Solutions: Shaft power limitation system

Maritime certified system that uses a shaft power acquisition module to continuously monitor, record, and display the instantaneous power being developed at the vessel propulsion shaft when the engine shaft is connected to the customers shaft power meter. The solution follows the EEDI requirements relating to CO₂ emissions for ships over 400 gross tonnages.



Data Respons Solutions: Fuel-efficiency and energy-independent eco driving platform

Fuel-efficiency and energy-independent eco driving platform that enables plan fuel reduction costs with up to 15%. The solution measures excess fuel/energy consumption, i.e. the proportion of total energy consumption that drivers can affect by how they drive. The energy-independent solution enables the fleet to be in a single system, regardless energy source (diesel, HVO, LPG, biogas, hybrid or electric).



Data Respons R&D Services AS: Designing Electric Vehicle Charging System with load balancing

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EPOS CAT GmbH: Ehrensache, applications for volunteer projects

Employees of this globally active corporation can register for volunteer projects via an application. The projects advertised are exclusively sustainable or socially oriented.

Examples of projects are trips with children or senior citizens, trips to sport matches, and renovation in home and garden.



STAKEHOLDER ASSESSMENT



STAKEHOLDER DIALOGUE

Data Respons' Stakeholder Dialogue

In 2020 and 2021 Data Respons conducted dialogues with key stakeholders on ESG matters. The perceptions on Data Respons' approach to sustainability were collected through interviews, meetings and other forms of direct communication. In addition, we conducted customer and employee surveys and participated in networks and industry organizations and work projects.

We did not carry out stakeholder interviews in 2022, since we did a stakeholder survey in early 2022 for last year's report.

However, we have an ongoing dialogue with different stakeholder groups about topics they are concerned with.

We always seek to challenge our sustainability priorities through an open dialogue. By knowing what drives our stakeholders, we believe we can make a positive difference and contribute to the achievement of the UN Sustainable Development Goals (SDGs).

Key stakeholders

Our most important stakeholders are employees, future employees, clients, suppliers and our owners, Akkodis. Further, authorities, local communities, organizations, research communities and suppliers are important to us.

Employees and future employees

Our highly competent employees are our primary stakeholders. They directly affect and are also affected by our policies and activities.

Investors/Shareholders/Owners

Data Respons is fully owned by Akkodis.

Clients

Data Respons' clients directly affect the company economically, and their expectations contribute to setting our sustainability priorities. About once a year, we send out an ESG-specified survey to one representative of this group. In addition to this, our subsidiary companies convey a customer survey to their clients.

Governments and civil society

Governments and regulatory authorities affect our operating conditions directly and indirectly. Local communities are indirectly affected by the company's activities in job creation, tax payment, and environmental impact.

We follow regulations from the government, e.g., the EU taxonomy and Data protection laws that impact our business.

Suppliers

Suppliers are directly economically affected by Data Respons, and indirectly affected by our strategic focus on responsible business practices. We have sent a letter to our suppliers asking them to join our journey towards becoming a net-zero company. The inquiry opened a dialogue with our suppliers on how to face the challenges related to our ESG strategy.

Data Respons Solutions has purchased the cloud-based supply chain and risk monitoring platform Integrity Next. The Integrity Next platform covers multiple ESG risk management topics that suppliers need to report on as well as providing country and industry risk indicators. The platform will help us report on and meet regulatory requirements and legislations and reduce risk in the supply chain.

How the Stakeholder Dialogues were conducted

Stakeholders are defined as individuals or groups that have interests that are affected or could be affected by our activities.

Data Respons aim to have an active dialogue with the company's stakeholders, as the conversation strengthens our relationship with, and understanding of, the societies in which we operate. Stakeholder dialogues are also beneficial as it allows the company to detect, investigate and manage potential risks arising in its immediate surroundings. The stakeholder dialogue is a key objective in the GRI Standards and help us identify our most significant impacts.

The company's approach to sustainability is based on the stakeholder dialogues conducted in 2021. Data Respons' Communications Department facilitated the stakeholder dialogues, speaking to representatives from key stakeholder groups, including employees, customers, shareholders, and suppliers, and interviewing them.

STAKEHOLDER DIALOGUE

| Stakeholder | Key Topic | How we engage |
|------------------------------|---|--|
| OWNERS/TOP MANAGEMENT | <ul style="list-style-type: none"> • Skills development • Equal treatment • Legal and appropriate conduct • Information and Data Security • Positive and professional corporate culture • Financial stability • Responsible purchasing • Code of Conduct • Gender equality • Human Rights | <p>Survey sent to four members of top management</p> <p>Interviews with management</p> |
| EMPLOYEES | <ul style="list-style-type: none"> • Human rights • Equal treatment • Skills development • Legal and appropriate conduct • Positive & professional corporate culture • Financial stability • Smart use of resources • Sustainable products and services | <p>Survey sent to representatives of employees</p> |
| CLIENTS | <ul style="list-style-type: none"> • Work with agile and highly competent consultants • High level of service and good customer communication | <p>Survey with randomly selected customers</p> |
| SUPPLIERS | <ul style="list-style-type: none"> • Follow laws and regulations in terms of ethical business operations, human rights, and anticorruption. • Sell products and services in a way to keep competitive advantage | <p>Supplier survey Sent supplier code of conduct Platform for improving on sustainability matters Ongoing communication in meetings, calls, etc.</p> |

Relevance levels

High

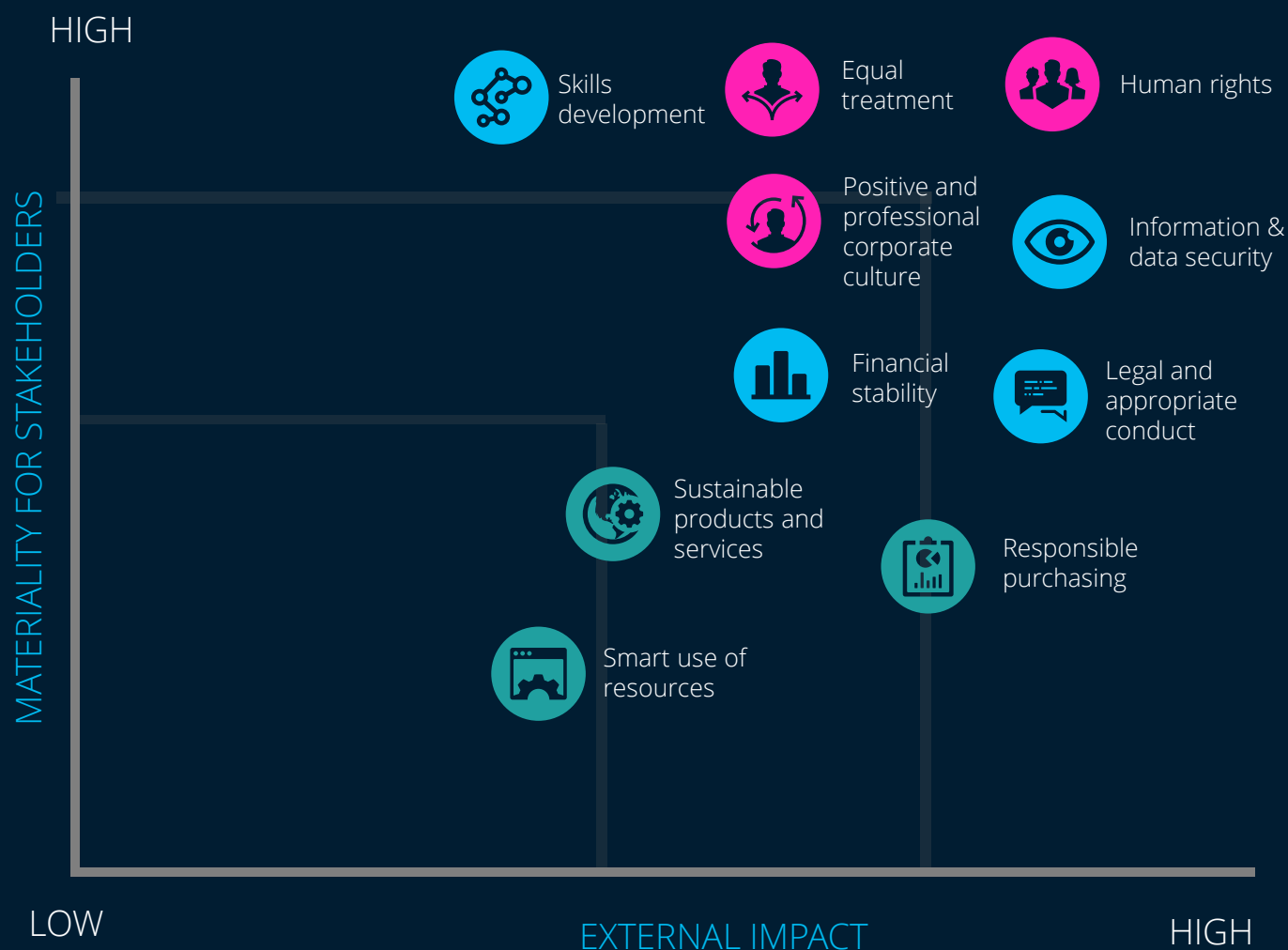
MATERIALITY ASSESSMENT



The background of the slide features a complex network diagram with numerous nodes and connecting lines, overlaid on a background of blurred data and numbers. The nodes are represented by various shapes (squares, circles, diamonds) in shades of blue, green, and yellow. The connecting lines are thin and colored in shades of blue and green. The background is filled with a dense pattern of blurred numbers and text, creating a sense of data and complexity.

RESULTS FROM OUR MATERIALITY SURVEY

The latest materiality analysis was completed in 2021 and essentially confirmed earlier assessments of the company’s most material sustainability aspects. First, the impact of various sustainability aspects of the external world was assessed. Second, the analysis identified the sustainability aspects important to Data Respons’ stakeholders (in this case, employees and clients) and what the stakeholders value when they make decisions in regards to business.



Impacts may change over time as both our activities and the societies in which we operate evolve. For this reason, we assess our surroundings and identify our impacts on an ongoing basis. This involves engaging with our relevant stakeholders through surveys and open dialogue.

The topics for 2022, identified in 2021, still represent our most material ESG topics. Moving forward in 2023, we will continue the evaluations of the material topics and their impact.

REPORTING ON MATERIAL TOPICS

Topics in this chapter

Environment

Social

Governance

PROGRESS ON GREEN GROWTH

Topics in this chapter:

- Emissions
- Energy use
- Circular economy
- Materials

WHAT IS THE ENVIRONMENTAL FOOTPRINT OF THE TECHNOLOGY INDUSTRY?



The total life cycle carbon footprint of the ICT sector is approximately 730million tons CO₂ equivalent (Mt CO₂-eq) or 1.4 percent of total global greenhouse gas emissions. Further, modern applications are almost always deployed over the cloud.

As a technology company, we mostly operate within software development. Hence, we do not have a lot of emissions directly connected to our business. Our solutions companies on the other hand, produce hardware. In this part of our operation, we do have emissions and impacts on the environment that we aim to reduce. Further we have the possibility to affect the environment directly and indirectly by choosing sustainable technology projects.

Environment and climate-related risks have been assessed as low, and are associated to office operations and related purchasing, business travels and employee commuting. Data Respons' environmental program is based on the company's environmental policy, targets and action plans. Linked to the target of becoming carbon neutral in our R&D and software focused business units by 2025, and carbon neutral in our Solutions orientated business by 2030, the company is working towards fossil-free transportation, fossil-free business travel as well as heating and cooling offices with renewable energy.

Waste and material use

We have worked with waste reduction and recycling over the past years and improved our waste management procedures. The majority of our waste is categorized as electronic waste, where more or less everything is managed properly and delivered to recycling, meaning reprocessing and re-use. In 2022, our total amount of waste was 0,6 tCO₂.

Energy use: purchased electricity, heating and cooling

When we started to map our greenhouse gas emissions in 2019, we observed that the use of energy was considerably high across the group. At the same time, this gave us an opportunity to understand, adjust and reduce our energy. In 2020 and 2021, many of our subsidiary companies switched to renewable energy providers. Today we are proud to announce that all offices across the group use green energy. In addition, we continually strive to reduce energy consumption, and we have cut down on heating and cooling during holidays and weekends.

CLOSING THE GAP TOWARDS A CIRCULAR BUSINESS MODEL

Becoming more circular

A circular economy is the opposite of a linear economy. A linear economy is based on the extraction, production and use, and incineration or disposal of waste (cradle-to-grave). In a circular economy, products must for as long as possible, be repaired, upgraded and, to a greater extent, reused.

The transition to a circular economy involves changes in the design stage: For circularity, production, choice of production methods and consumption patterns. Digitalization, use of services and sharing economy are key.

Where we stand

On a group level, the majority of Data Respons' business model is based on consultancy services. As for the solutions segment, we do not develop own products, but develop products and solutions according to our customers specification.



Our most valuable contribution is to positively influence our customers to choose sustainable options.

We believe that a successful sustainable development can only be achieved in cooperation with our valued customers, business partners, and suppliers. Being serious about sustainability is increasingly important. All products should be designed for lifetime sustainability (cradle-to-cradle) meaning they should be designed to be energy efficient, durable, repairable, upgradable, easy to maintain, reusable and recycled to increase lifetime.

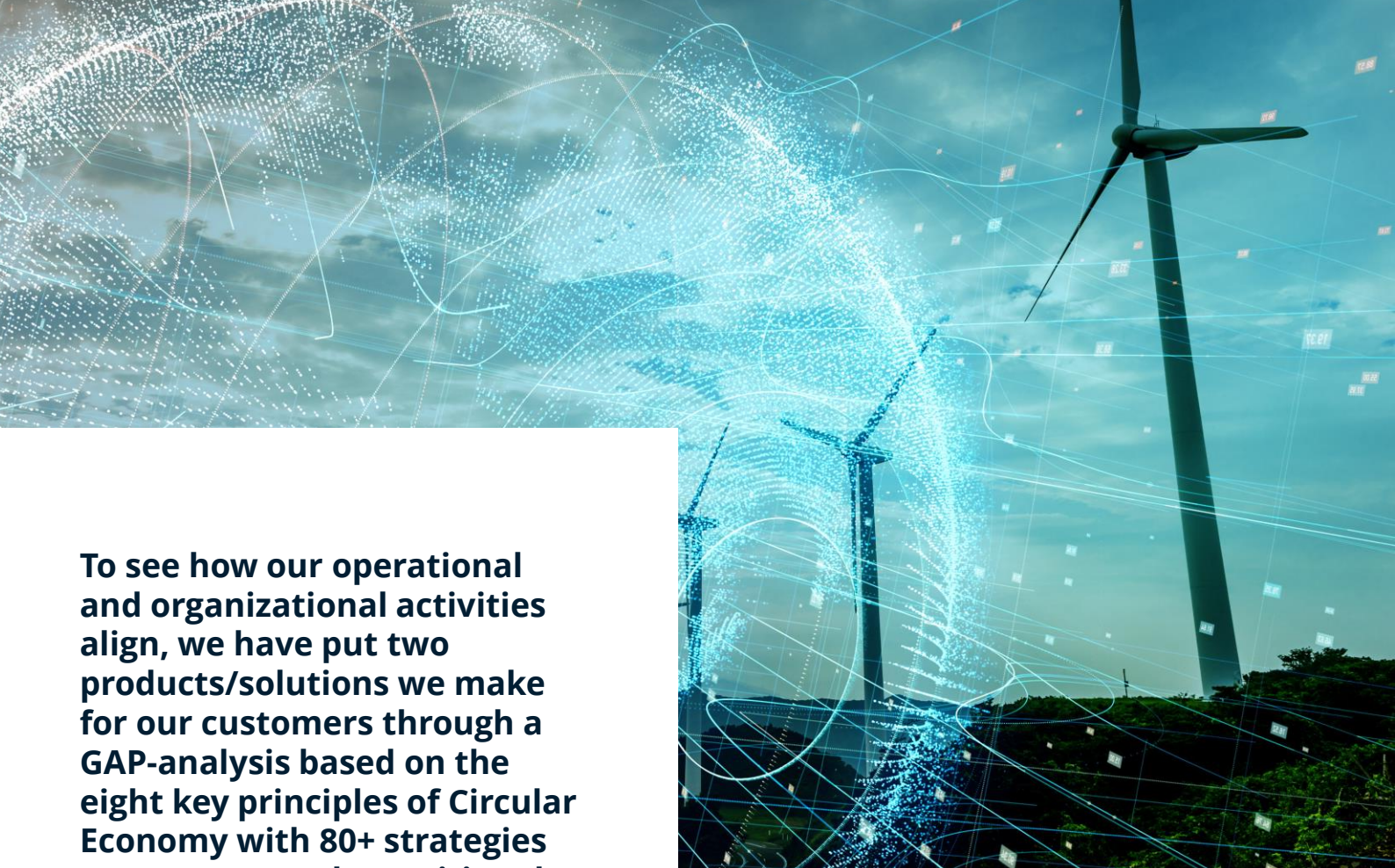
We are experiencing a higher environmental focus among our customers. Some of our customers have stipulated in their service and support agreements that damaged products and solutions shall be used to repair and maintain other returned or damaged goods. Others have stipulated a certain percentage of their products to come from recycled plastic or from recycled or low-carbon aluminum. Nevertheless, we have barely scratched the surface on this topic.

Circular Economy training

As up to 80% of a product's footprint is decided in the design phase, we need to learn more about how we can influence our customers to make more sustainable products and solutions.

In 2022 we entered into a pilot project agreement with Circular Norway to put circular economy and eco-design on the agenda. The outcome of these workshops are that our customers have increased awareness for eco design and have increased opportunity to choose better materials for more circular products. Management and all Norwegian employees have gone through:

- Introduction to Circular Economy
- Circular Business Strategies



To see how our operational and organizational activities align, we have put two products/solutions we make for our customers through a GAP-analysis based on the eight key principles of Circular Economy with 80+ strategies (we are currently awaiting the full report).

These 8 principles are:

- 1. Prioritize regenerative resources**
 - 2. Stretch the lifetime**
 - 3. Use waste as a resource**
 - 4. Rethink the business model**
 - 5. Design for the future**
 - 6. Incorporate digital technology**
 - 7. Team up to create joint value**
 - 8. Strengthen and advance knowledge**
-

We firmly believe that strengthening our skills on Circular Economy, Eco-design and the mapping of a products footprint will benefit our customers, especially when it becomes mandatory to report on GHG Scope 3 emissions, which will happen in a few years. We can't really start talking about net-zero or decarbonization when 70% to 80% of emissions in the electronics industry is currently not reported on.

According to the World Economic Forums report: [Net-Zero Challenge: The supply chain opportunity](#), ~5% of supply-chain emissions in the electronics industry can be addressed through circularity, for instance recycling plastic as input material. Larger potential comes from material and process efficiency improvements, accounting for ~20% of potential savings, especially in manufacturing and mining.

As Nigel Topping, UNFCCC's High-Level Climate Action Champion puts it: Supply-chain decarbonization will be a 'game changer' for the impact of corporate climate action.

Emissions

Topics in this chapter:

- Emissions
- Method: GHG Protocol
- Reduction of emissions

Emission Mapping

Every year, Data Respons conducts emissions mapping across the group, and this is our fourth year of reporting. Through the years we have managed to reduce our emissions considerably.

Reporting on all three scopes across the whole group involved some trial and error. While our efforts to reduce carbon emissions through for instance switching to renewable energy sources, reducing air travel, and implementing electrical company cars, have made a substantial difference. A significant part of the reduction is also due to a new and more correct way to map and report our carbon footprint.

For Scope 3, indirect emissions resulting from our value chain activities, there are still some carbon emission sources that we have not taken into account. Nevertheless, we aim to continually improve our mapping.

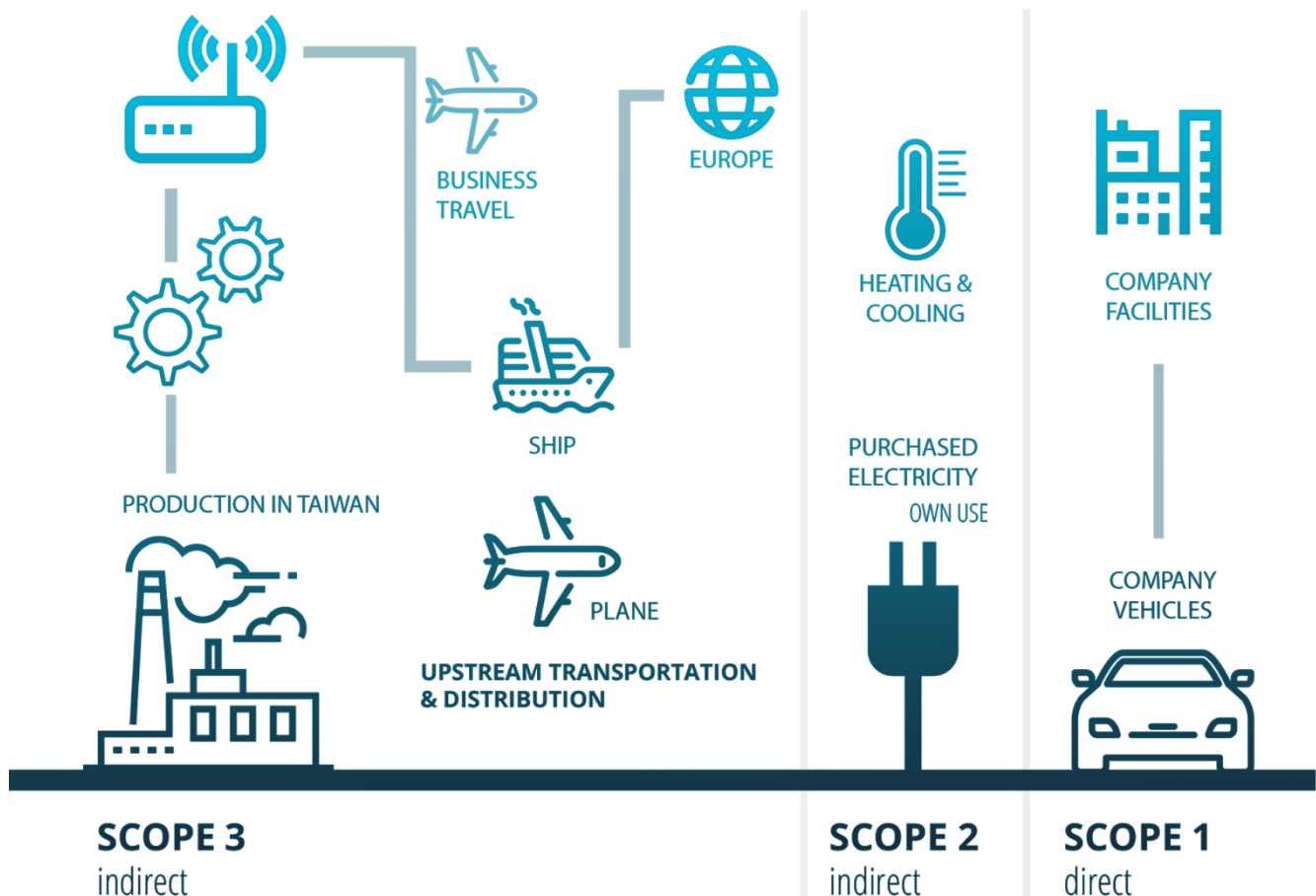


Data Respons' emissions reflect our focused business areas. As we divide our businesses in R&D (Research and Development) services and Solutions, emissions reflect this proportionally. Our R&D subsidiaries typically have relatively low emissions as they work as software consultants and produce no physical products. Our Solution business unit on the other hand, deliver the whole supply chain from designing to producing hardware. We therefore see a completely different picture in this business segment and considerably higher emissions.



Method GHG Protocol Standard

Our carbon mapping and environmental footprint has been checked and verified by a third party (Cemasys) and follows the GHG-protocol standard, which provides the world's most widely used greenhouse gas accounting standard. The GHG emissions in this report are calculated based on activity data provided by Data Respons (such as number of flights and routes, amount of electricity consumed, number of laptops purchased), factors for GHG emissions provided by various databases (e.g. gCO₂e/km, gCO₂e/kWh, kgCO₂e/kgbags).



In the calculations we distinguish between direct and indirect emissions.

Direct emissions (aka. Scope 1)

are emissions from Data Respons' use of fuel for company vehicles.

Indirect emissions are split in two categories:

Scope 2 emissions are linked to electricity, heating and cooling of the office and storage facilities.

Scope 3 emissions are linked to buying goods and services, flights, shipping, getting goods delivered, servers and cloud-services.

REDUCTION OF GHG EMISSIONS:

HANDLE THE BIGGEST EMISSION FACTORS FIRST

Production of technology

The by far biggest emission point is production of technology, which Data Respons has located in Taiwan. Production is ordered exclusively for Data Respons Solutions' customers. For 2022 approximately 27% of our group's emissions belong to this category.

From 2021 to 2022, we have reduced emissions from 4815 t to 2271 tons CO₂e. This reduction is largely due to a change in how we calculate our scope3 emissions. We no longer count direct shipments from our suppliers to our customers without any Data Respons interactions as our own emissions. This new calculation of shipments have been made by Cemsys, our third-party consultants on emissions reporting.

Transportation and distribution of own products

Transportation and distribution constitute our second biggest category of emissions. More specifically, the emissions come from our technology products which are transported and distributed from Taiwan to Europe and distributed within Europe.

These emissions represent 19% of our group's emissions and are also exclusively for Data Respons Solutions' customers and represents.

Both production and transportation and distribution of our own products remain some of the biggest emission segments in 2022. They represent upstream and downstream activities and counts for nearly 50% of our total emissions.

Business travel

Business travels account for 25% of our total emissions. In our sustainability strategy we state that all domestic flights must be reconsidered if necessary, and digital meetings are preferred.

In addition to this, all necessary flights should be carbon-offset, but of course this should always be the last option when a flight cannot be avoided. Further, we request individual travel policies in every daughter company.

In 2021 business travels represented no more than 5,2% of our total emissions. The increased number we see in 2022 is partly caused by a lower total number, and partly caused by our integration with Akkodis. The last couple of years, the pandemic naturally reduced the total number of business travels, but in 2022 some business-critical trips were required.

Employee commuting

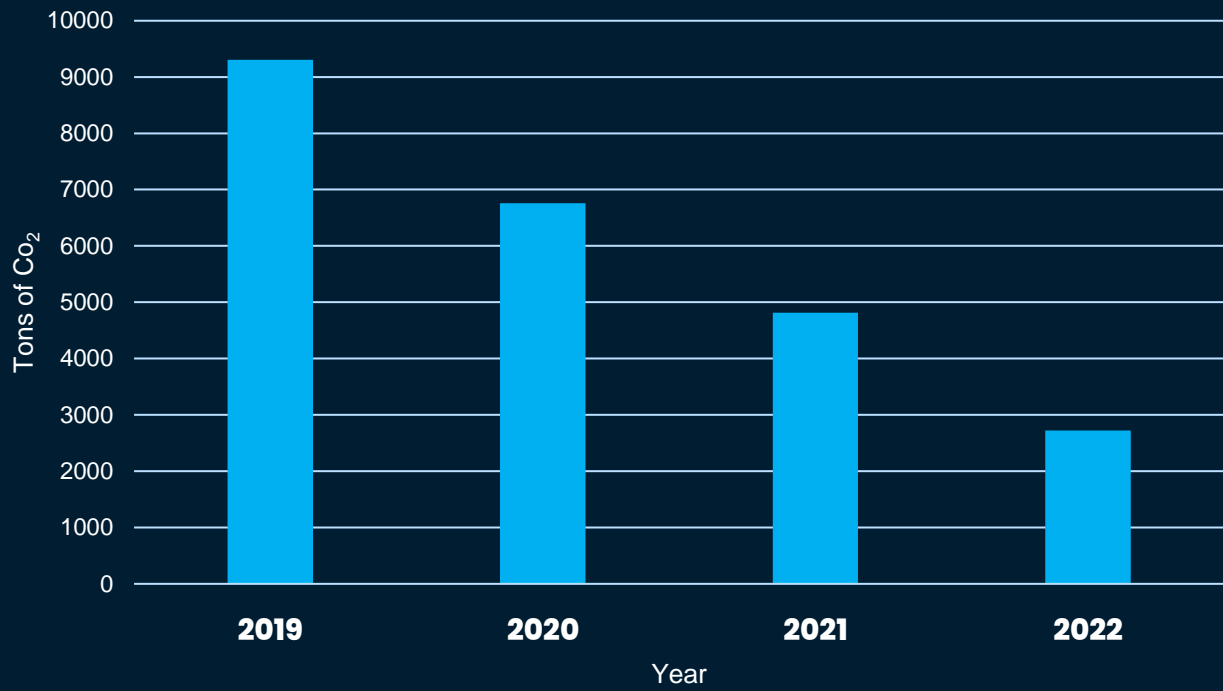
Besides production and transportation of technology, emissions from employees travelling to and from the workplace stand for 7% of the total emissions.

The emissions are caused by the employees' own fossil fuel-based or diesel cars, as well as company vehicles. Looking back at 2021, the climate impact of how employees get to work was 7,3%.

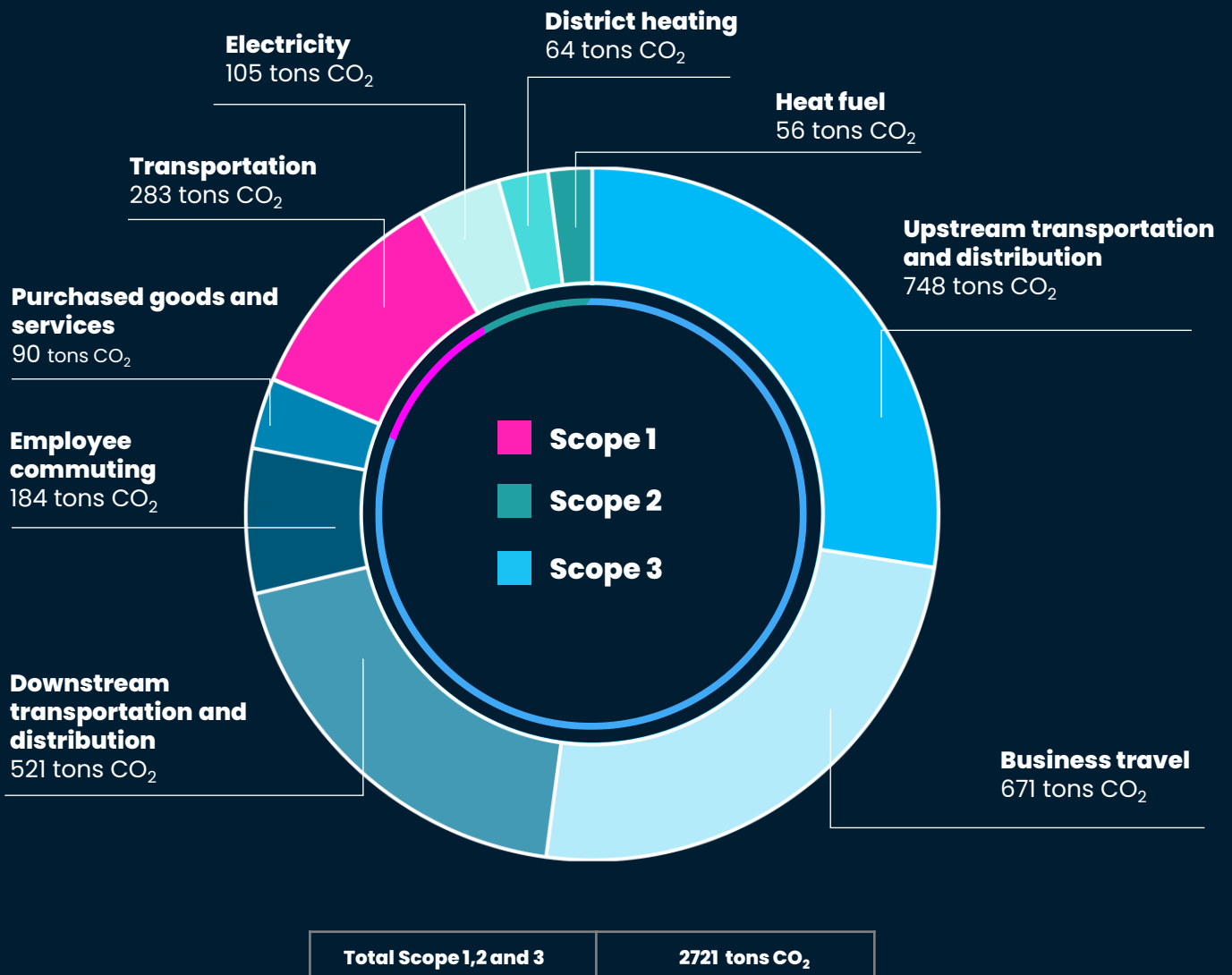
We can only speculate in the reasons behind the reduced emissions, but we might have had vehicles with better fuel economy as well as increased use of a hybrid workplace model which mixes in-office and remote work causing less commuting. Differences in geography and other work conditions are reflected in the individual needs for commuting.

Data Respons has the ambition to support our employees to choose climate friendly transportation, like public transportation, bicycles or electric vehicles. More, we have a policy stating that if a subsidiary company is in the need of a new office building, it should be climate neutral.

Emissions



Categories of emissions 2022



Energy Use

TACKLING OUR ENERGY USE

We have had a significant impact on the environment through our energy use. Consequently, we have switched to 100% renewable energy for purchased electricity in all our offices.

Further, we have an ongoing dialogue and are researching possibilities for renewable energy sources for production of technology in Taiwan.

**Furthermore,
we do several actions our own:**



Purchase renewable
electricity for the energy
supply in our offices



Smart heating/ cooling
system that switches off in
vacations/ weekends

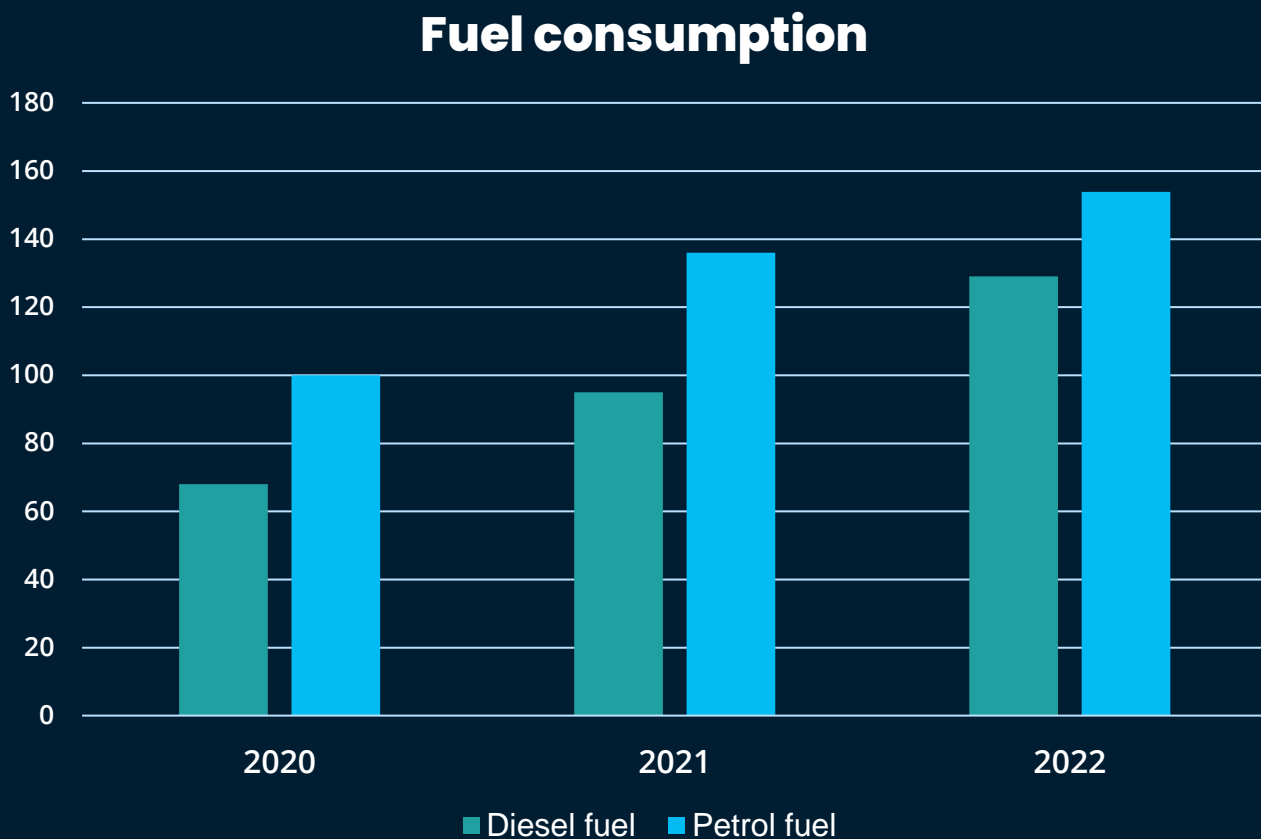


Switched to energy
efficient lightning



Encourage our partners
to switch to renewable
energy sources

Emissions from fuels



The main reason for the increase in fuel consumption is that Data Respons is growing in employees and subsidiaries. With the acquisition of the company Frobese, the total number of company cars increased correspondingly.

To reduce our carbon footprint, we acknowledge that a reduction in the consumption of fossil fuels is necessary. This requires us both to investments in alternative energy sources and promoting the use of renewable and low-carbon fuels. It also requires changes in our social behavior.

“ The shift from gasoline- and diesel-powered vehicles to zero-emission vehicles will happen continually in the years to come.

Materials

IMPROVE MATERIAL USAGE

As a technology company, operating mainly within software services, we do not have comprehensive use of materials. Nevertheless, we aim to gain a complete picture of all materials we use and our waste footprint and include it in the report.

For our subsidiary company Solutions, we map the following waste

- Paper/cardboard
- Plastic
- Metals
- Residual waste (wood)
- Electric and electronic waste

WE AIM TO :



Follow up production
in Taiwan



Ensure that production
is as energy efficient as
possible and products
are as reusable as
possible

As a supplier of products and solutions containing minerals, Data Respons is aware of the responsibility we have towards countries and their inhabitants where the minerals are mined.

Data Respons has therefore developed a conflict minerals policy.

DATA RESPONS IS COMMITTED TO:

Not knowingly procure any component, product or solution containing conflict minerals from conflict sources.

Have an open dialog with customers, partners and suppliers regarding conflict minerals.

Request our partners and suppliers to avoid use of conflict minerals from conflict sources in their components, products and solutions.

Request our partners and suppliers to provide conflict minerals policy and detailed declarations regarding the mineral content in the components, products and solutions.

Request our partners and suppliers to notify their downstream suppliers not to use conflict minerals from conflict sources.

ENABLING PEOPLE & CAUSES

Topics in this chapter:

- Positive & professional corporate culture
- Equal treatment
- Activity & Disclosure Act
- Skills development
- Sponsorships

HUMAN RIGHTS

Respecting human rights is a fundamental part of Data Respons' corporate responsibility and is vital to the sustainable operation of our business. We are committed to respecting fundamental human rights in our operations, our value chain, and in the communities where we operate. We use our influence to promote human rights and work to ensure that no abuse of human rights takes place in our operation or value chain.

We recognize that we can contribute to the fulfilment of human rights. We have a responsibility to prevent, mitigate, and address adverse human rights impacts in our own operations but we also use our leverage to promote respect for human rights in our value chain.

Our commitment is based on our company values, our Code of Conduct, and our Supplier Code of Conduct which is available on our website.

Our actions to protect human rights

- We have zero tolerance for bullying, unwanted sexual attention, or harassment.
- We promote diversity with respect to employee gender, age, ethnicity, physical abilities, personality, skills, experiences and backgrounds.
- We respect employees' rights to privacy. The General Data Protection Regulation (GDPR) became Norwegian law in 2018.
- All our employees have the right to join or not join a labor union.
- We conduct our activities without discrimination, we treat our employees fairly and compensate fairly by offering competitive salary and benefit packages.
- We ensure that we pay the same rates for same type of work regardless of gender, culture or other origin.
- Everyone who is employed by us works here of their own free will in alignment with the ILO Declaration.
- We have our own Supplier Code of Conduct, which our suppliers are obligated to follow. Suppliers must abide by the same rules as those we have laid down for our own employees.

Positive & professional corporate culture

Making Data Respons a great place to work at

Data Respons is truly a tech and customer driven company, based on a people- centric culture. We strongly believe in a decentralized and dynamic group structure with empowered local management and employees.

Across our portfolio of companies there are numerous brand building activities and recruitment through, for example, participating in conferences, seminars and courses. The company recruits globally and offers flexible and individualized terms of employment and centrally located offices to attract the right employees.

Keeping our employees healthy and ensuring their well-being is important to Data Respons. Better health fosters lower sick leave and a joyful work environment, which again results in improved performance at work – supporting our high-performance culture. Our employees are our most important resource and it's our responsibility is to make sure they have the best possible working conditions. In this we follow our corporate values to the letter.

Examples on executing on those values are:

BEING GENEROUS:

- Allowing for, and promoting physical activity
- Creating attractive workplace experiences
- Supporting exchange opportunities across the group

TAKING RESPONSIBILITY:

- Incentivising sustainable commuting
- Mobilising local ownership of sustainability plans and actions

TO PERFORM:

- Hosting hackathons
- Publishing short videos on how to improve mental and physical performance
- Cultivating a sharing culture on tech insights

HAVING FUN:

- Team building
- Weekly social gatherings
- E-sport events

Creating a healthy work space

14,5%

TURNOVER
in 2022

3,5%

SICK LEAVE



Our sick leave decreased from 5,9% in 2021 to 3,5% in 2022. We attribute the high number in 2021 to the pandemic and the highly infectious omicron virus.

A healthy and safe working environment

Keeping our employees healthy and ensuring their well-being is important to Data Respons. Better health fosters lower sick leave and a joyful work environment, which again results in improved performance at work – supporting our high-performance culture.

Working Environment Committee or appointed safety representatives

The Data Respons companies have varying sizes and needs regarding their working environment and their safety representatives. Therefore, each subsidiary is responsible for managing their working environment committee or for appointing safety representatives.

Health and safety risks

Data Respons’ greatest health and safety risks are repetitive strain injuries and stress-related disorders. Corporate culture encourages physical movement and variation in working posture. Aimed at minimizing stress, Data Respons strives to maintain an open, communicative, reassuring, and transparent culture. The company’s employees are provided occupational health services according to their individual needs, as well as tools and equipment to prevent repetitive strain injuries, for example. In the Data Respons group were in total 0 work related injuries reported in 2022.

2022 saw slightly higher turnover and lower sick leave

The turnover in the group increased slightly in 2022. Historical data shows that the turnover in the company tend to fluctuate around 15%. Our sick leave decreased from 5,9% in 2021 to 3,5 % in 2022.

| | 2020 | 2021 | 2022 |
|------------|-------|-------|-------|
| Turnover | 15,9% | 14,1% | 14,5% |
| Sick leave | 2,6% | 5,9% | 3,5% |



Equal treatment

Equal opportunity and pay



Promoting equal opportunity

Data Respons is committed to providing equal employment opportunities and treating all employees fairly and with respect. Data Respons' employees and business units shall only use merit, qualifications, and other professional criteria as a basis for employee-related decisions, such as recruitment, training, compensation and promotion. We strive to develop programs and actions to encourage a diverse organization based on the principle of equal opportunities.



Equal pay

In Data Respons, the practice is equal pay for work of equal value – regardless of gender, ethnicity, religion, sexual orientation, family conditions or disability. Salary and terms of employment for comparable positions are the same for women and men. Recruitment, promotion, and development of the employees are based on merit and equal opportunity regardless of ethnicity, religion, gender, age, national origin, sexual orientation, marital status and disability.



DATA RESPONS STRATEGY FOR DIVERSITY

Diversity, with respect to both gender and ethnicity, can offer significant competitive advantages. Although achieving a gender balance is challenging in a world with few female computer science engineers, the group works to promote the profession among young engineers and strives to increase the share of female engineers and encourage female leaders.



Actions always speaks louder than words, especially so when it comes to societal topics. In order to power our own efforts on equality we have set very concrete targets. And we are slowly, but surely working towards them.

Kenneth Ragnvaldsen, CEO, Data Respons

22%

WOMEN
in 2022

We increased the number of women in total from 21% to 22% in 2022. The share of women in leading positions decreased from 32% in 2021 to 26% in 2022, which is a result of new and improved data handling.

Working to get the right balance of specialists

Since Data Respons was founded there has been a strong commitment to fostering a culture of diversity and inclusion, and this commitment has only grown stronger as we included more companies, nationalities, and cultures into our company. The Data Respons Code of Conduct helps govern issues such as fair employment, diversity, discrimination, harassment and health and safety. All companies in the Group are obliged to adopt and implement the Code of Conduct to ensure a uniform approach to these issues across the Group. Discrimination, bullying, or harassment is not accepted, and employees are asked to report incidents of such behavior to their immediate supervisor or the employee representative.

26%

WOMEN
in leading positions

```
late ORDER BY shot_date DESC");
```

```
INCT(studio) as studio, COUNT(*) as count FROM image WHERE day_id = '$day->id' AND enabled='y' GROUP BY studio  
result)) {
```

```
shot_date, $studio_list->studio, "quick");
```

```
> $studio_list->studio, "count" => $studio_list->count, "title" => $day_info->title);
```

```
die("error studio");
```

```
date'") != 1) die('date not found');
```

```
image in FROM image, image_date WHERE image_date.id=image.day_id AND image_date.shot_date='$date' AND image.enabled
```

```
ht($image->image_id);
```

```
image->image_id);
```

Activity & Disclosure Act

NEW REPORTING REQUIREMENTS IN NORWAY

In 2020, Norway introduced a new law that requires all Norwegian companies to actively promote equality and prevent discrimination in the workplace. In addition, companies with more than 50 employees need to report on gender differences in several areas on including pay, leading positions, parental leave and involuntarily part time work.

As an international company with headquarters in Norway we have started to report on any gender difference by our Norwegian subsidiary, Data Respons R&D Services, which has more than 50 employees.

We aim to use this reporting exercise as a case of awareness which we can export to all our European operations in the long run. The requirements are unique for Norway, but we believe it is a valuable exercise, and we aim to conduct it through our group where it is possible.

When it comes to parental leave there are too few data points to make a matrix. This due to the high number of junior developers, which makes the number of persons on parental leave very low. In 2022 Data Respons R&D Services had no employees working temporary or part-time.

Equal pay

It is the individual employee's role, competence, experience level, effort and performance that determines the salary level.

All employees are part of the same individual the follow-up system and compensation assessments, where we make sure to adjust employees in comparable roles.

In the table below you can see the average salary level for men and women in different positions.



We hire graduates with the same salary, regardless of gender, and monitors statistics/data to ensure comparability throughout the career.

The differences that exist at salary level is a result of variations in education, experiences, performance, effort, and role in the company - and not a question of gender, ethnic background or other discriminatory criteria. Differences in working hours also have an effect.

Data on average pay from 2022 shows that female develop engineers and senior develop engineers are as well or better paid than their male counterparts. In the more senior categories, the women are younger and have less experience, thus also have a lower salary than their male counterparts, which all have more experience.

Proportion of women and men by job level

| | 2022 | 2022 | 2022 | 2021 | 2021 | 2021 | 2020 | 2020 | 2020 | 2019 | 2019 | 2019 |
|--------------------------|----------------|--------------|------|----------------|--------------|------|----------------|--------------|------|----------------|--------------|------|
| Job category | Share of women | Share of men | Sum | Share of women | Share of men | Sum | Share of women | Share of men | Sum | Share of women | Share of men | Sum |
| Management | 80% | 107% | 100% | 25% | 75% | 100% | 14% | 86% | 100% | 14% | 86% | 100% |
| Specialist Dev Engineers | 84% | 101% | 100% | 8% | 92% | 100% | 0% | 100% | 100% | 0% | 100% | 100% |
| Senior Dev Engineers | 100% | 100% | 100% | 10% | 90% | 100% | 14% | 86% | 100% | 17% | 83% | 100% |
| Develop Engineers | 102% | 100% | 100% | 6% | 94% | 100% | 8% | 92% | 100% | 8% | 92% | 100% |
| Administration | 100% | N/A | 100% | 100% | 0% | 100% | 100% | 0% | 100% | 100% | 0% | 100% |
| Total | 102% | 100% | 100% | 9% | 91% | 100% | 10% | 90% | 100% | 11% | 89% | 100% |

Average pay between women and men

| | 0 | 0 | 0 | 2021 | 2021 | 2021 | 2020 | 2020 | 2020 | 2019 | 2019 | 2019 |
|--------------------------|--------------------|------------------|--------------------|--------------------|------------------|--------------------|--------------------|------------------|--------------------|--------------------|------------------|--------------------|
| Job category | Average pay, women | Average pay, men | Average pay, total | Average pay, women | Average pay, men | Average pay, total | Average pay, women | Average pay, men | Average pay, total | Average pay, women | Average pay, men | Average pay, total |
| Management | 80% | 107% | 100% | 80% | 107% | 100% | 81% | 103% | 100% | 78% | 104% | 100% |
| Specialist Dev Engineers | 84% | 101% | 100% | 84% | 101% | 100% | N/A | 100% | 100% | N/A | 100% | 100% |
| Senior Dev Engineers | 100% | 100% | 100% | 100% | 100% | 100% | 105% | 99% | 100% | 103% | 99% | 100% |
| Develop Engineers | 102% | 100% | 100% | 102% | 100% | 100% | 102% | 100% | 100% | 98% | 100% | 100% |
| Administration | 100% | N/A | 100% | 100% | N/A | 100% | 100% | N/A | 100% | 100% | N/A | 100% |
| Total | 102% | 100% | 100% | 102% | 100% | 100% | 99% | 100% | 100% | 94% | 101% | 100% |

Skills development

DEVELOPING OUR EMPLOYEES

Data Respons is a workplace that devotes a great deal of energy to attracting, developing and retaining skilled and creative colleagues. Colleagues and culture are essential parts of the company's strategy, with focus on skills, innovation and long-term leadership. The company is an arena of skills, and each employee ultimately owns their development. Data Respons shows the way by creating clear development paths and offering a carefully chosen range of skills-enhancing activities in our specialist areas.

At Data Respons, employees gain experience from different industries, companies and organizations. They also have opportunities to work across the entire field of IT and develop in various roles. Above all, they learn in client assignments – every single day, we are working in the thick of the digital revolution. That is why the breadth and development potential that Data Respons can offer are very special indeed.

All subsidiaries have individual expertise and needs. Consequently, a solution for all does not fit our need. We have decided to pass the responsibility to create development plans for every employee to each subsidiary. Each company is responsible to handle recruitment, onboarding, and continuous development plans in accordance with Data Respons values.



Goals and results for continuous learning and development

Some of our subsidiaries have their own learning platforms or academies in place and offer diverse development plans for their employees. Frobese, i.e., has their own academy, and Akkodis offers learning arenas to their employees. Our ambition is to find a solution to have a set of opportunities available to as many employees as soon as possible.

This year we also started facilitating an exchange program, with Akkodis Australia to exchange skills and insights on data analytics and R&D projects. We will continue this work in 2023.

Sponsorships

DATA RESPONS ENGAGES AND SUPPORTS THE NEXT GENERATION



Enabling the young

Young people are our future and we want to be a part of giving coming generations the best starting point possible and the ability to grow and prosper into educated, healthy and valuable individuals. This is why The Data Respons Group has set up a fund called Enabling the Young. The fund will support a wide range of efforts where young people benefit, and we seek worthy causes where we feel assured that the support given will go more or less directly to the cause with very few administrative expenses.

Enabling children in low-income countries

Over 600 million children and adolescents around the world are unable to reach minimum proficiency levels in reading and mathematics – even though two thirds of them are in school. This learning problem is the greatest global challenge to preparing children and adolescents for life, work and active citizenship according to UNICEF.

Data Respons support various organisations

One of our long-lasting initiatives is The Society for Street Children in Nepal, a non-profit fund-raising society working for the accommodation for street children in Nepal. The highest priority is given to girls since they in particular run the risk of human trafficking. The Society will also provide education for children and young people who would otherwise have no access to education. In addition, the Society will provide food for children living on the streets.

Another example is the humanitarian organization “On Own Feet”, which works with children in war-torn countries. The organization provides school materials, builds and reconstructs schools, and provides medical kits to women’s clinics. Data Respons have supported the organization for nearly 20 years.

Scholarly programs

Several of our subsidiary companies support students with a scholarship program during bachelor or master studies to encourage more students to choose an education within STEM (science, technology, engineering and mathematics.)

Sports clubs

From the start, physical activity has been an important part of the Data Respons culture. Enabling young people to perform, whether it is in sports, education, or other aspects of life, is deeply embedded in our company values. Sport conveys many strong values that make up both a lively everyday life, and a strong corporate culture: Team spirit, a clear strategy and, above all, a large portion of emotion and pure passion for a common cause. Data Respons’ subsidiary companies sponsor both small local teams and youth national teams within various sports, such as cycling, ice hockey, football and hand ball.

DATA RESPONS SPONSORSHIPS



Gatubarn i Nepal (Homeless children in Nepal)

Data Respons is helping "Gatubarn i Nepal" enabling opportunities for young girls. Nepal is a small country in Asia and home to many of the world's most famous mountains. However, Nepal is also one of the world's poorest countries, where approximately 40% live below the poverty line. The Global Hunger Index reports that malnutrition remains a barrier to growth and development of children. In 2001, 57% of all children under 5 years old suffered from stunting. In 2019, thanks to hard work, the number decreased to 32%. But according to UNICEF, the pandemic worsened the situation, and Nepal is back to the numbers that applied in the early 2000s.



World Usability Day

Since 2017 our subsidiary company, IT Sonix Custom Development GmbH has arranged an event on the World Usability Day in Leipzig. At this one-day conference, professionals, students and anyone interested meet for exciting presentations and workshops on the topics of user experience, human-centred design. The question of how we can make future services and products easier to access and simpler to use is also discussed.

This year's theme was "Our Health". The team at IT Sonix facilitated constructive talks where speakers from a wide range of companies, educational institutions and organisations shared their knowledge, provided insights into solutions, learnings and best practices, and illustrated how usability influences our everyday lives. Data Respons is a proud sponsor of World Usability Day. Usability and UX design are important parts of our business.



Team Rynkeby

Team Rynkeby is a European charity cycling team which support children with critical illnesses. Team Rynkeby consists of more than 2.000 riders distributed on 62 local teams in 9 countries, and every summer the teams ride from their respective cities to Paris to raise money. In 2021, one of our employees in Sweden participated. This year, we are happy to report that three employees participated, representing Sweden and Denmark. Team Rynkeby donated 10,4 million EUR to organisations that help children with critical illnesses.



Girl Tech Fest & Tenk Girl Camp

We need more women in technology - because we need more people and greater diversity within the tech industry. That's why we proudly support the events Girls Tech Fest and Tenk Girl Camp. Both are organized in Oslo by the Oda Nettverk, Tenk. This year, young girls put together Christmas decorations using a breadboard and components that create blinking lights at the Girl Tech Fest with help from Data Respons R&D Services.



Developers hacking for greener IT

Data Respons gathers developers from across the group to participate in our internal Hackathon, taking on different dilemmas that are both relevant for the times we live in, and the tech business. This year the developers spent 24 hours trying to create new ways to tackle the sustainability struggles we're currently facing. The event was hosted by Data Respons subsidiary, MicroDoc, at their Munich headquarters, welcoming different teams from across the group, including Frobese and EPOS CAT.

One of the teams took on the task to try to reduce the energy consumption of coding. The team experimented with both hardware and software and worked on developing more efficient algorithms and choosing hardware consuming less energy. All this was to be combined in a tool to assist the team in its development work and to find methods to reduce energy consumption by refactoring algorithms and reducing runtimes.



ENSURING PROFFESIONAL BUSINESS & CONDUCT

Topics in this chapter:

- The Transparency Act
- Responsible purchasing
- Legal & appropriate conduct
- Human rights

GOVERNANCE

Building trust through good corporate governance is key and part of the license to operate for every company. Data Respons continues to identify ways to improve on topics like transparency, supply chain management and professional conduct. With a growing number of companies, employees, locations, and customers it is very important to us that we continue to build a professional and responsible corporate culture.

Ethical guidelines

In 2019 we made a comprehensive Code of Conduct that was launched in 2020 together with an updated whistle-blower service. The Data Respons Code of Conduct is sent to every new employee when in their first week of work. Everyone is requested to read it and follow up with their supervisor if something remains unclear. The supervisor has the responsibility to follow up that the Code has been read and understood.

Also, we launched a Supplier Code of Conduct Principles in 2019 and have executed a supplier audit in Taiwan in early 2023. The Supplier Code of Conduct sets out the minimum standards in key areas including business ethics and anticorruption, as well as human rights, labor conditions and sustainability for Data Respons' suppliers. Failure to comply with these requirements may result in the termination of the business relationship.

Risks and opportunities

Ethical risks include for instance employee failure to comply with national regulations, Data Respons' Code of Conduct or employee involvement in corruption, bribery, or other irregularities. Such actions may damage the brand or lead to legal sanctions and fines. Data Respons does not have any operations in high-risk countries. Regardless, running a professional corporate culture is very important to us.



Whistle blowing

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns, and report suspected violations. All employees, suppliers and partners can also use Data Respons' whistle-blower channel, where concerns can be reported anonymously.

Any anonymous alerts will be handled by the group top management through the whistle blower platform. In any case the alerts are about the top management the Board of directors will handle the alerts.



Information about whistle blowing can be found in our [Code of Conduct that is available on our website.](#)

As an international company we strive to:

- Contribute to quality education in our communities
- Promote decent work throughout the value and supply chain
- Foster economic growth in our communities
- Strengthen local communities and institutions through capacity building on human rights and good governance



DATA SECURITY & INTEGRITY

Cyber Security Awareness

It-security and cyber security awareness has probably never been more relevant, and it is very much a shared responsibility for everyone in the company.

Trusted research and cyber security reports state that human error is the major contributing cause in 95 % of all breaches. In other words, attentive, observant, and alert employees are instrumental in helping us stay safe.

Actions:

- Regular password check-ups by a third party
- Implemented multi-factor authentication
- Using cloud services that hinder too much data and information being stored locally
- Dedicating every October to raising cyber awareness
- Using internal events like hackathons to focus on IT security challenges and solutions
- Taking our own medicine by implementing our cyber awareness offerings internally, such as fake email campaigns, fake Wi-Fi hotspots and fake QR codes to train employees to recognize potential threats.

GDPR

Under the GDPR, Data Respons has firm legal requirements to protect against personal data breaches and specific timelines within which to report and communicate applicable breaches to affected personnel. The GDPR requirements extend to all vendors that Data Respons uses to collect, store and process personal data on its behalf. Data security and integrity is managed at Data Respons through a combination of Group-wide and complementary daughter company policies and processes. Information security is managed within each subsidiary with oversight at Group level.

Actions:

- During the cyber security month in October, we ran our annual internal campaign educating employees on the latest cyber security trends and threats
- We have also carried out fake phishing campaigns where we sent fake phishing emails to our employees. This was done in order to train them on how to recognize and identify phishing threats
- In order to increase the employees' knowledge on data protection, we carried out online learning modules on personal data protection, how Data Respons manages personal data, and how to understand more about who to connect with on personal data protection.

The Transparency Act

Norway's Transparency Act came into force on July 1, 2022 and applies to larger companies that are resident in Norway and that offer goods and services in or outside Norway. It also applies to larger foreign enterprises that offer goods and services in Norway, that are liable to tax to Norway pursuant to internal Norwegian legislation.

The Transparency Act requires that companies carry out due diligence assessments relating to Human Rights and decent working conditions within our own business, our business partners and our supply chain according to OECD guidelines for multinational companies. Our work with the Transparency Act will be continuous in the coming years as both risks and measures will change in line with societal developments and the information we receive from, among others, our employees, business partners and our suppliers.

The Due Diligence assessment will be published on our website by June 30, 2023:

<https://datarespons.com/about/esg/>

Responsible purchasing



Data Respons' success is dependent upon the cooperation from our business partners – suppliers, customers, contractors, agents, distributors, consultants or joint venture partners and others. Our business partners are expected to comply with all applicable laws and regulations.

Suppliers that have a direct contractual relationship with Data Respons should adhere to the principles set out in Data Respons' Supplier Code of Conduct. We aim to use our purchasing power to actively promote positive change across our value chain.

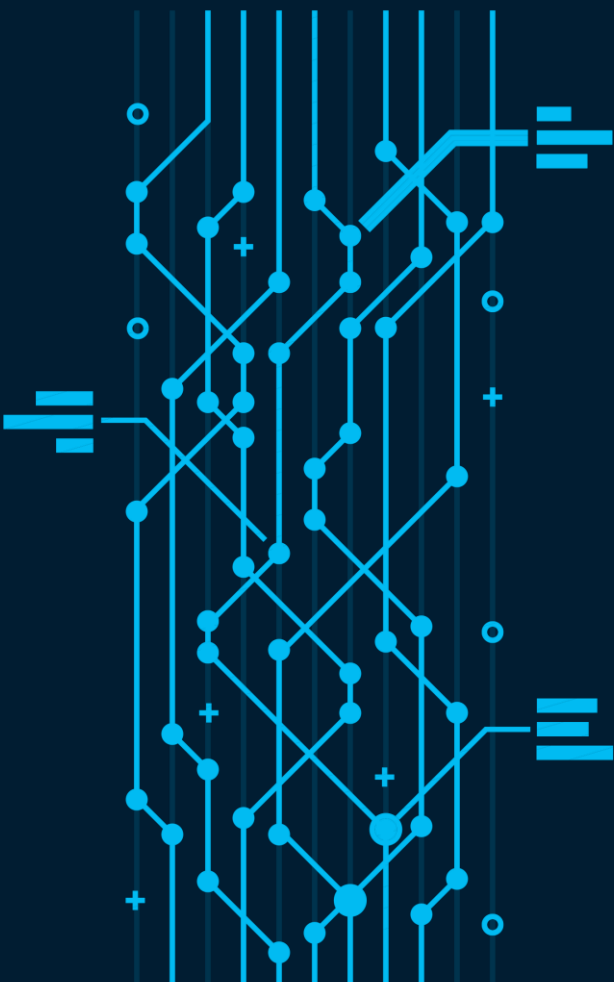
Risk assessments

We must exercise caution when entering into agreements with intermediaries, i.e. business partners who are acting on Data Respons' behalf, which may include agents, distributors, and resellers, as Data Respons may be held responsible for the actions of such intermediaries. For the same reason, we must be vigilant in exercising oversight and supervision of such intermediaries throughout their engagement with us.

Our intermediaries shall follow all applicable laws and regulations and are expected to adhere to Data Respons' Code of Conduct. It is our responsibility to ensure that intermediaries understand Data Respons' Code of Conduct and our requirements on environmental impact.

This includes the manufacturing process, choice of materials, transport and working conditions. We rely on the supplier's disclosures concerning environmental impact and work environment.

We carry out risk-based integrity due diligence processes to ensure that the business partners' reputation, background, and abilities meet our standards. All Data Respons suppliers must adhere to our Supplier's Code of Conduct, which aligns with the Data Respons Code of Conduct in all material respects, including environmental guidelines. Corporate department has conducted the risk assessment.





Legal & appropriate conduct

ETHICAL GUIDELINES AND RESPONSIBILITIES

Data Respons does not tolerate any form of corruption. We are committed to complying with all applicable laws and regulations enacted to fight corruption and bribery . We prohibit payments of bribes and kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Data Respons is opposed to any form of money laundering and has taken the relevant measures to prevent financial transactions that are of criminal intent. Data Respons complies with the governmental guideline on anti-corruption in Norway and applies it to all daughter companies and works actively to combat corruption and unethical practices. The CEO of Data Respons, Kenneth Ragnvaldsen, bears the ultimate responsibility for ethics and anti-corruption at Data Respons. Further, the CEOs in each subsidiary, bear the responsibility in their companies.

Guidelines for employees

Employees must not give or receive gifts, benefits or bribes. Employees are not allowed to obtain or retain business or other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary. Employees shall not, in the conduct of your work for Data Respons, request, accept or receive any improper advantage that may influence your decisions.

Non-compliance will be treated as a serious violation and a disciplinary matter. Employees shall be protected against any sanctions from Data Respons or any Data Respons representative for refusing to participate in any action that is or can be perceived as corruption, bribery or facilitation payment.

Independence and political affiliations

Data Respons is politically independent and does not sponsor political organisations.

“ This information can be found in the [ESG section of our website](#).



Human rights

MODERN SLAVERYACT

We support the principles underlying the Universal Declaration of Human Rights, the UN Global Compact and ILO's eight core conventions. Our human rights policy is based on the UN Guiding Principles on Business and Human Rights.

Data Respons' business is heavily dependent on human resources. This entails risk linked to discrimination based on gender, sexual orientation, ethnic origin, religious identity, political affiliation, disability, or age. Through our own Code of Conduct and our Supplier Code of Conduct we have set out strict guidelines against anything that violates human rights. In addition, we do regular supplier audits. Data Respons' management works continuously to ensure that all operations follow the company's Code of Conduct. Everyone must show respect for the individual and their privacy and dignity.

Our main business operations are located in Europe where we consider human rights to be assured in working environments. However, we also have a location in Taiwan where we produce technology.

Data Respons has conducted quality assessments there in 2019 and 2020 to make sure human rights are assured.

The Transparency Act applies to larger companies that are resident in Norway and that offer goods and services in or outside Norway and to larger foreign enterprises that offer goods and services in Norway, that are liable to tax to Norway pursuant to internal Norwegian legislation.

The act requires us to carry out Due Diligence assessments relating to Human Rights and decent working conditions within our own business and our supply chain according to OECD guidelines for multinational companies.

Relevant Policies

- **Code of Conduct**
(Data Respons companies and employees must comply)
- **Data Respons Supplier Conduct Principles**
- **United Nations 10 principles**
(Data Respons companies, employees and partners must comply)
- **Data Respons Conflict Mineral Policy**

Appendix: Risk assessment



| Market and operational risks | Description | Action |
|--|---|--|
| Capacity utilisation risk | Data Respons' revenues are highly dependent upon the number of consultant hours sold. Reduced demand for consultant hours affects capacity utilisation and may be caused by any number of factors, including economic downturns and/or lacking the right consultant skills. Moreover, there is risk that clients may in some cases discontinue projects at short notice, which in turn may prevent Data Respons companies from immediately occupying the consultants involved in other assignments. | The Data Respons group is developing its business and deepening expertise in areas where demand is growing and is expected to continue growing for many years ahead. The group's services cover the entire project life cycle and consultants are equipped to successfully take on various roles. Employees are continuously further developed. Our companies also work with a large number of sub-consultants so that capacity can be adjusted to the current state of the economy and variations arising from our clients. |
| Ethical risks | Ethical risks include employee failure to comply with national regulations, Data Respons' Code of Conduct or employee involvement in corruption, bribery or other irregularities. Such actions may damage the brand or lead to legal sanctions and fines. | All Data Respons new employees are required to read the company's Code of Conduct. |
| Environment and climate-related risks | As a service company, Data Respons has relatively little environmental and climate impact. Environment and climate-related risks have been assessed as low, and are connected to office operations and related purchasing, business travel and employee commuting. | Data Respons' environmental programme is based on the company's environmental policy, targets and action plans. Linked to the target of a carbon neutral Data Respons by 2025, the company is working towards fossil-free transportation, fossil-free business travel and heating offices with renewable energy. |
| Health and safety risks | Data Respons' greatest health and safety risks are repetitive strain injuries and stress-related disorders. | Our corporate culture encourages physical movement and variation in working posture. Aimed at minimising stress, Data Respons strives to maintain an open, communicative, reassuring and transparent culture. The company's employees are provided occupational health services according to their individual needs, as well as tools and equipment to prevent repetitive strain injuries, for example. |
| Human rights | Data Respons' business is heavily dependent on human resources. This entails risk linked to discrimination based on gender, sexual orientation, ethnic origin, religious identity, political affiliation, disability or age. | Data Respons' management works continuously to ensure that all operations follow the company's Code of Conduct. Everyone must show respect for the individual and their privacy and dignity. |
| Financial risks | Data Respons is exposed to typical financial risks, such as liquidity risks, interest rate risks, currency risks and credit risks. | Data Respons maintains a positive equity ratio and have demonstrated financial solidity for many years. More on financial risk can be found in previous annual reports. |

Like all companies, Data Respons is exposed to several risks that could affect the Group's business, earnings and financial position. In response, ongoing risk assessments are performed that identify risks and initiate the actions required to manage them.

| Market and operational risks | Description | Action |
|------------------------------|---|---|
| Skills provision | Data Respons' business is dependent upon its capacity to attract and recruit skilled employees and upon its employees maintaining their skills, continuing to develop and staying motivated. There is high demand for qualified labour and the company may have difficulty recruiting employees to a sufficient extent. High employee turnover or loss of key people could therefore have negative impact on the company. | Data Respons works continuously with working conditions, company culture, leadership and skills development to ensure that the company is an attractive employer and has the right skills available. Data Respons works with brand building activities and recruitment through, for example, participating in conferences, seminars and courses. The company recruits globally and offers flexible and individualised terms of employment and centrally located offices to attract the right employees. |
| The economy | The European IT and consultant services market for digitalisation consultancy services is affected by the general economy. Deterioration of the general business climate could therefore affect demand for the company's services. | The company has developed areas of expertise where market demand is expected to remain strong for decades. In addition, the company further develops skills in new areas on an ongoing basis and monitors national and global market trends. Operations are based on the global megatrends of digitalisation and sustainability, which creates some resilience against economic fluctuations. |
| Client concentration | Data Respons' top ten clients account for a large percent of the company's revenue. Data Respons aims to establish long-term client relationships. Several organisations have been Data Respons clients for many years. | Data Respons often has many different, mutually independent projects in progress for its larger clients. The company strives to maintain a good balance among clients from different industries and geographies to mitigate risk exposure. The company includes a strong focus on diversification. |

ENABLING A DIGITAL FUTURE



Learn more about how we enable sustainability
through technology on

datarespons.com/about/esg/