

ESG REPORT

2020

data:respons

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EXECUTIVE SUMMARY FOR 2020

**NOK 1 987
MILLION**

REVENUE

growth of 6%
(1 866 in 2019)

**NOK 238
MILLION**

EBITA

EBITA margin of 12%
(216 in 2019)

1376

EMPLOYEES

(1412 in 2019),
including subcontractors

15.9%

TURNOVER

(12,3% in 2019)

**NOK 269
MILLION**

OPERATIONAL CASH FLOW

(203 in 2019)

9 303 TONS

CARBON EMISSIONS

(1 385 in 2019)

2.6%

SICK LEAVE

DIVERSITY

20%

WOMEN

(21% in 2019)

45

NATIONALITIES

25%

WOMEN IN
MANAGEMENT
(28% in 2019)

39

AVERAGE
AGE

LOCATIONS

NORWAY

SWEDEN

DENMARK

GERMANY

FRANCE

UNITED KINGDOM



CEO'S MESSAGE

“ 2020 made digital sustainable value creation more important than ever before, and we are proud to be part of enabling the world to do more with less”

CEO, Kenneth Ragnvaldsen

PROVIDING SUSTAINABLE TECHNOLOGIES - ENABLING THE GREEN SHIFT

If there is ever going to be a massive investment in new, green technology, it is now. Digitization has already shown to be a key tool in reducing energy consumption (IEA). As a technology company delivering R&D engineering services, software, hardware and IoT solutions, we believe we can make an important difference, enabling the green shift.

Our ambition to become a carbon neutral company is riddled with challenges and small setbacks. Still, it does not change the fact that we are experiencing an overall positive development and a massive interest among our employees to take part in shaping a company for the future.

The tech industry is the change agent we need

According to the IEA, CO₂ emissions fell seven percent in 2020, the biggest drop recorded yet in modern history. Now the challenge is to help the world from rebounding to pre pandemic emission levels.

Our industry represents a small portion of the world's emissions, but a large part of the world's solutions. That is why we think it's time the tech industry should combine its role as a digital transformation agent, with its role as a sustainable transformation agent.

Microsoft CEO Satya Nadella noted in April 2020 that "we've seen two years' worth of digital transformation in two months." The tech industry is already deeply embedded in digital transformations across all industries. We are thus already in place as change agents who work every day to enable a digital future in the public and private sector.

Our central role in digitalization means that we also can take on a central role in making the world more sustainable.

Being a change agent in a broader sense

As the tech industry grows and facilitates more jobs, more complicated value chains and more interactions across borders it also has a unique opportunity to affect working conditions, gender equality and transparency. To name a few important dimensions.

In 2020 AKKA Technologies acquired Data Respons, and thus creating Europe's largest digital solutions powerhouse, able to address the high-volume and fast-paced growth in the digital market. However, with growth comes increased responsibility. We have a track record of growing and enabling our companies to become as professional as possible and drive positive change. Our hope is that the tech industry takes responsibility to champion positive change as the industry continues to grow. We also hope that our industry has the ambition to be proactive on all relevant subjects, even those that can only be affected indirectly and that are hard to measure.

Our company has its roots in the Nordic corporate model where trust, equality, freedom to organise, equal pay and generous welfare benefits are cornerstones in a productive and well-functioning corporate society.

For us, sustainability is not just about how we conduct ourselves, but also is about the requirements that we set out for our business partners and suppliers. We are increasingly using our purchasing power to drive positive change at our suppliers and in 2020 we have developed a Supplier Code of Conduct. As CEO of Data Respons, I look forward to further prioritise our sustainability efforts in the time to come.

“

Sustainability at Data Respons is about using the possibilities technology gives us, to actively promote the green transition in all industries.

Kenneth Ragnvaldsen, CEO Data Respons

Less talking and more walking

Sustainability has been an integrated part of our strategy, culture and business for many years. For us this is business as usual; We change and improve our activities to create enduring positive change. Our key focus in this regard is sustainability through technology, and we have hundreds of concrete R&D projects and solutions together with our customers to show for already.

To keep the value of our common effort for sustainability as integrated part of business and the society in general, we have in 2020 signed "[the guide against green washing](#)" to emphasize that this only has true value if we really mean it! We have also adapted to new challenges over night and learnt to work 100% digitally. Despite Covid-19, we have continued to deliver our expertise and achieved new highs. At the same time, we have seen increased interest for our ESG-contents. Climate change, the corona pandemic and new regulations, like the EU-taxonomy, have all contributed to an increased focus on sustainability.

Last year we delivered our first sustainability report. This year we are strengthening our reporting on both environmental, social and governance topics including emissions, energy use, materials, positive and professional corporate culture, equal treatment, skills development, responsible purchasing, legal and appropriate conduct and human rights.

I look forward to sharing our progress in all of these areas with you in our future ESG reports.

Kenneth Ragnvaldsen,
CEO Data Respons



ABOUT THIS REPORT

ABOUT THIS REPORT

This is Data Respons second ESG-report, covering the fiscal year 2020.

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

Our ambition is to improve our ESG reporting from year to year, and to report in accordance with the GRI Standards by 2022. The next report will be published in April 2022.

This report focuses on Group wide ESG performance 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 Endrava.

The report has been approved by Data Respons' Board of Directors. It has not been reviewed by a third party.

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ABOUT DATA RESPONS

ABOUT DATA RESPONS

Data Respons is a technology company delivering consultancy services, R&D engineering services, software and hardware development, smarter embedded and IoT solutions. We develop everything from sensor level to the app, making us a good partner for our customers in their digital transitions. We can provide a complete competency platform during a development project.

Our engineers specialize in understanding the environmental challenges and demands of our customers products on top of being best-in-class within their technical disciplines. This combination of experience and knowledge is the foundation that makes us specialists on embedded development.

We have a lifetime perspective on our relationships and work closely with customers – from idea to implementation. Customers are benefitting from our multi-disciplinary engineering competence and industry know-how developed over the last 30+ years.

Our highly experienced specialists have a broad range of expertise from various disciplines and can cover all parts of the technology development cycle.

Data Respons' unique business model enables customers to choose a form of collaboration that suits their needs. We can provide a complete competency platform during a development project with the knowledge from our R&D specialists.

Data Respons helps its customers succeed in the connected and digital world. We combine technical expertise and business insight to create innovative, secure and sustainable solutions that enables

businesses capture opportunities within digitalisation.

Data Respons is a pure-play digital leader with an in-depth expertise in software development, R&D services, advanced embedded systems and IoT solutions. The trends of increased automation, digitalisation and 'everything connected' (IoT) fit well with both the Data Respons' business units and competence map.

The company has a highly diversified customer portfolio in industries such as the Mobility sector, Telecom & Media, MedTech, Security, Space & Defence, Energy & Maritime, Finance & Public and Industrial Automation.



1500
specialists



11
Agile
companies



**Operating
Across Europe**



**Complete
Technology
Partner**

Everything digitalised, connected,
automated **everywhere.**

WE DEVELOP EVERYTHING FROM SENSOR LEVEL TO THE MOBILE
APP MAKING US A GOOD PARTNER FOR YOUR DIGITALISATION



WORKING WITH
EVERY INDUSTRY



**product
development**



**Strategic
partnership**



**Long term
projects**

2 billion
NOK
in revenue

20%
Annual growth
2000-2020

CORE BUSINESS AREAS IN WHICH DATA RESPONS IS INVOLVED

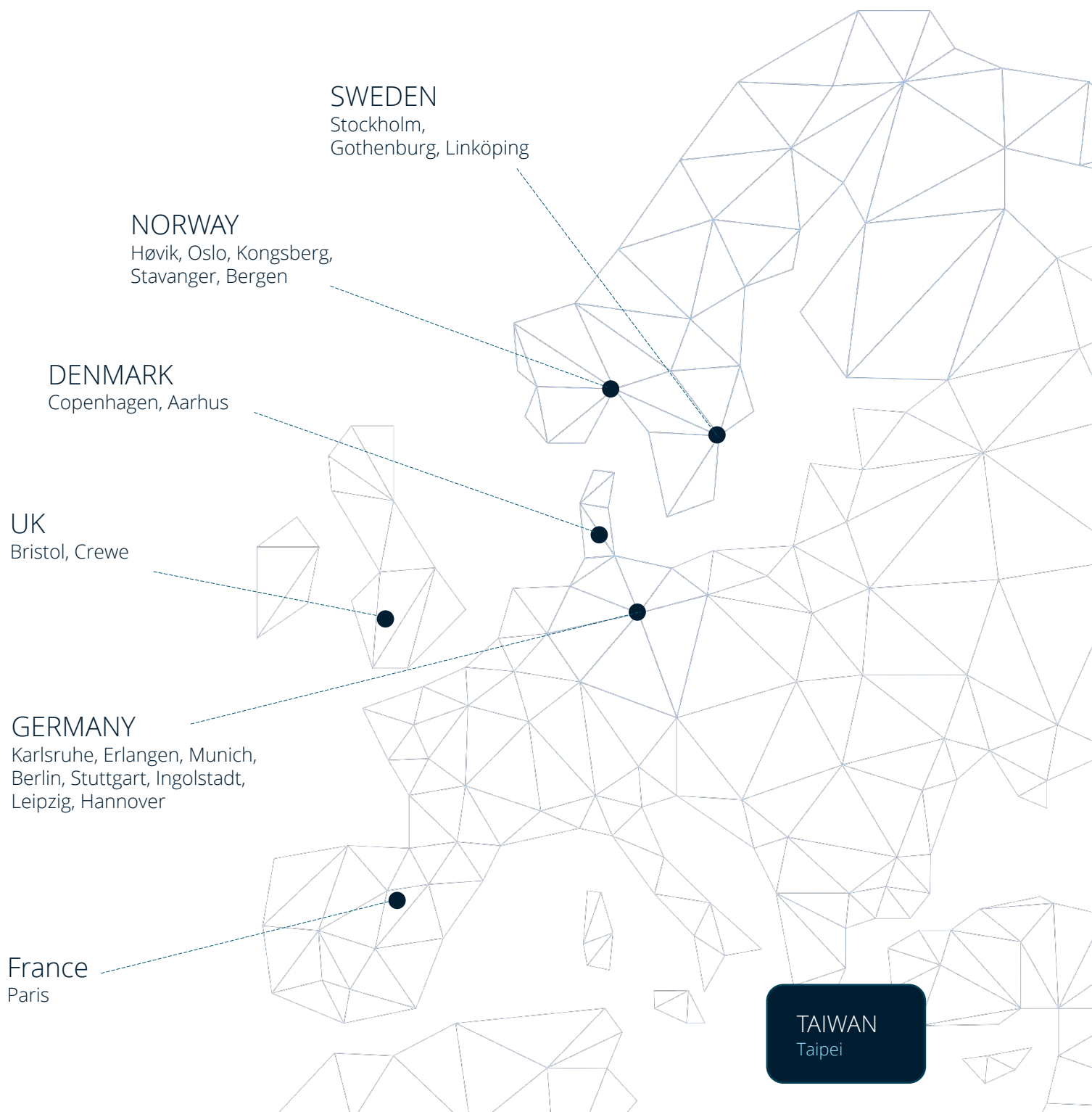
- Mobility projects such as connected cars, digital car infotainment, fleet management systems, car sharing, ADAS and autonomous systems, remote software update, cloud applications, electrification and sensor & telematics solutions.
- Smart grid/smart home solutions/smart devices/IoT gateway solutions
- Digital shipping, transportation and maritime IoT applications
- R&D IT Services and system integration, assisting all phases of the whole software development cycle
- Digital transition of banking/insurance infrastructure and systems
- Advanced communication systems for security and defence applications
- Projects to transform telecommunications, mobile structures and connectivity platforms towards full IoT accessibility
- Sensor-based smart factory systems
- Data acquisition sensor systems to improve the efficiency of oil & gas exploration
- Future MedTech applications with IoT solution capabilities and a complete digital software platform
- Software-heavy cloud infrastructure systems
- Software components and solutions for IoT applications
- Software end-to-end systems and digital transition of existing industrial products and installations

GEOGRAPHIC REGIONS AND LOCAL EXPERTISE

Data Respons has offices in the Nordic region, as well as in Germany, France, UK and Taiwan. Our business model is based on close cooperation with our customers and understanding their business needs.

To facilitate close cooperation, Data Respons believes in having regional offices with skilled engineering staff (specialist level) in key industrial clusters. This builds strategic and long-term relationships, as well as in-depth industry know-how, with our key customers.

Data Respons is headquartered in Oslo (Norway) and has a strong portfolio of clients in the Nordic region (Norway, Denmark and Sweden) and in Germany, supported by 1,500 software & digital specialists.



SWEDEN
Stockholm,
Gothenburg, Linköping

NORWAY
Høvik, Oslo, Kongsberg,
Stavanger, Bergen

DENMARK
Copenhagen, Aarhus

UK
Bristol, Crewe

GERMANY
Karlsruhe, Erlangen, Munich,
Berlin, Stuttgart, Ingolstadt,
Leipzig, Hannover

France
Paris

TAIWAN
Taipei

OUR COMPANIES

epos

DONAT IT

frobese

inContext

RD
DATA RESPONS

MICRODOC

TechPeople

data respons
SOLUTIONS

data respons
FRANCE

IT SONIX

SYLOG

OUR PURPOSE

Our mission, vision and values drive Data Respons to work closely with the customer as a long-term preferred partner. Based on our multi-disciplinary engineering competence and broad industry experience developed over the last 35 years, we support our customers from specification to delivery. It is important that our customers experience the benefits of speed, innovation, quality and cost improvements – our main value propositions to the market.



Vision

No. 1 choice on Industrial digitalization, connectivity (IoT) and Embedded technologies – Offering a unique dual expertise in engineering and digital expertise for the entire product lifecycle.



Mission

Create competitive power and drive digital transitions for our customers through customized technology and niche specialists * *Thus contributing to a more sustainable future for all.*



Values

BEING GENEROUS

We strive to have an open-minded, inclusive and learning-based attitude and culture.

HAVING FUN

In Data Respons, crazy, non-standard ideas are valued. A good laugh and a sense of humor bring energy.

TAKING RESPONSIBILITY

When taking total responsibility, we mean helping our colleagues, getting involved, showing enthusiasm and being loyal.

TO PERFORM

Having an underlying will to succeed in everything we do. Desire to acquire new knowledge and exploring new ways to achieve our aim to be the best at what we do.

CORPORATE GOVERNANCE

Data Respons is fully owned by AKKA Technologies but operates as an independent brand with its own management and maintains its strategic direction as an enabler of digitalization in the B2B segment.

MOTHER COMPANY

**AKKA
Technologies**

CEO
Mauro Ricci

DATA RESPONS AS

CEO
Kenneth Ragnvaldsen

Ownership and legal form

In 2020 AKKA Technologies acquired Data Respons, and thus creating Europe's largest digital solutions powerhouse, able to address the high-volume and fast-paced growth in the digital market. The management of compliance risks, including risks related to corruption and human rights violations, are integrated in our business planning, enterprise risk management and follow-up process, including relevant risk-mitigating actions and key performance indicators.

Scale of the organization

As of March 2021, Data Respons has 11 daughter companies across the Nordics, Germany, UK and France. Each daughter company has its own management as Data Respons embraces a distributed organizational model with a high degree of local autonomy. Data Respons functions as a portfolio company with a small staff, which is tasked with the implementation of the company's strategic ambitions and to identify and release any potential synergies across the portfolio.

SUBSIDIARIES

Data Respons Solutions

Managing director
[Jørn Toppe](#)

Data Respons R&D

Managing director
[Ivar Melhuus Sehm](#)

Data Respons France

Managing director
[Guillaume Wolf](#)

IT Sonix

Managing director
[Andreas Lassmann](#)

Microdoc

Managing director
[Christian Kuka & Florian Öhlschlegel](#)

Frobese

Managing director
[Dirk Frobese & Nick Stöcker](#)

Epos CAT

Managing director
[Heidi Sauer](#)

Donat IT

Managing director
[Ediba Hastor](#)

Sylog

Managing director
[Johan Jacobsson](#)

InContext

Managing director
[Martin Lampinen](#)

Techpeople

Managing director
[Gilad Mizrahi](#)

AKKA UK

Managing director
[Paul Nokes](#)

BOARD OF DIRECTORS

Data Respons is now an AKKA company and thus AKKA fills the majority of the seats in the Board of directors. Data Respons' organisation is structured and managed in accordance with the Norwegian Code of Practice for Corporate Governance.

Data Respons' Board of Directors ('the Board') has an annual programme of work including specific topics and fixed items, such as the approval of the annual financial statements, interim financial statements and budgets. The Board is also responsible for overall strategy and for setting long-term goals, as well as important decisions about acquisitions, establishment of new operations and major investments. The Board of Directors evaluates its performance and competence annually.

Sustainability is integrated with the business and the company's executive leadership team is responsible for strategic and operational control of the company's sustainability work and for monitoring the results. The board's responsibility within ESG is to define key priorities for the ESG strategy, whereas the management is responsible for the execution of the ESG-goals.



CHAIRMAN OF THE BOARD
MAURO RICCI
(FOUNDER & CEO, AKKA TECHNOLOGIES)

Mauro Ricci
CHAIRMAN OF THE BOARD



MEMBER OF THE BOARD
NATHALIE BUHNEMANN
(GROUP CFO, AKKA TECHNOLOGIES)

Nathalie Buhnemann
MEMBER OF THE BOARD



MEMBER OF THE BOARD
LARS PETERS
(DIRECTOR MERGERS & ACQUISITIONS/ CORPORATE DEVELOPMENT, AKKA TECHNOLOGIES)

Lars Peters
MEMBER OF THE BOARD

THE UN GLOBAL COMPACT

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



United Nations
Global Compact

**Data Respons' Communication on Progress
2020 is available on
UN Global Compact website:**

<https://www.unglobalcompact.org/what-is-gc/participants/134406#cop>



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 companies. We strive to explore technology projects contributing to a more sustainable world, especially those making the world greener, stronger, smarter and more equal.



4 QUALITY EDUCATION
Ensuring inclusive and quality education for all and promoting lifelong learning.

Education is key to achieving many of the other sustainability goals. Quality education can break the cycle of poverty, reduce inequalities and reach gender equality. Data Respons supports several organisations working to increase access to quality education for children living under challenging conditions.



3 GOOD HEALTH AND WELL-BEING
Ensuring healthy lives and promoting well-being for all at all ages.

Emerging technologies like AI, 5G and smart devices enable digitalisation within healthcare. For example, we have developed technology that ensures high training of medical staff for a customer in the medtech industry.



10 REDUCED INEQUALITIES
Reducing inequalities within and among countries.

According to the UN, inequalities based on income, gender, age, disability, sexual orientation, class, ethnicity and religion continue to persist across the world. Aside from technological efforts we cooperate with a range of charities promoting the education of women and opportunities for the mentally disabled, and enabling children living in poverty to go to school.



7 AFFORDABLE AND CLEAN ENERGY
Ensuring access to affordable, reliable, sustainable and modern energy for all

Transitioning the global economy towards clean and sustainable energy is one of our greatest challenges in the coming decades. At Data Respons we seek out opportunities to help our customers facilitate access to clean, renewable energy and to make energy more efficient and advance cleaner fossil-fuel technology.



13 CLIMATE ACTION
Taking urgent action to combat climate change and its impact

In addition to taking responsibility for our own emissions, we want to engage ourselves in customer development projects that have a positive impact on the environment. Our specialists across the company take part in technology projects that seek to cut emissions from vehicles, develop battery technology and reverse vending solutions. We are also involved in projects optimising wind power and smart house management solutions.

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 50 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 visualise carbon cost in our customer contracts and employ eco design as a natural step in the product cycle.



Solutions DK – Advanced textile RFID solution

Advanced RFID solution for managing textile inventory and optimising laundry processes. The solution transforms RFID data into interactive dashboards and reports, providing business intelligence via a comprehensive and real-time overview of scrubs and textile inventory.

The solution is developed for healthcare and workware end users and encourages employees to change clothes more often, improving cleanliness, hygiene, and well-being. Patients benefit from a more hygienic environment, reducing the risk of contamination.



IT Sonix: Six sustainable tech projects from 2020

IT Sonix: Six sustainable tech projects from 2020

We have an ambition to be directly involved in at least 100 sustainable tech projects every year that makes a difference. Here's six examples from 2020

[Read more about IT Sonix sustainable tech cases here.](#)

Solutions SE - Public transportation information system

Information system for public transportation used in passenger information displays and passenger voice announcement systems. The system is located outdoors on railway stations and platforms. And enables the customer to share real time information about any delays with passengers.

Being able to plan a journey and ensuring that your choice of transportation is on time is vital for travellers making their journey both faster and safer.



Sylog: Public Safety industry

Sylog consultants are working with software development of the SAFE Platform product. This product is delivered and deployed in several police district in UK making the police constables work more efficient and at the same time creating 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.



Solutions DK - Automated weight monitoring solution

Automated weight monitoring solution for livestock using AI. The solution provides daily, routinely weight monitoring of farm livestock and lets farmers know the exact value and performance at pen and individual level. Access to daily weight and weight gain is key for optimising feeding and shipping strategy.

Livestock farmers and integrators struggle to optimise their management strategy due to lacking weight parameter. This solution allows the farmer to monitor daily weight and weight gain, optimise sorting strategy, identify low performers, forecast slaughter weight, and identify slaughter-ready animals making production more cost efficient, effective, and sustainable.



Sylog: zero emission power train

Battery management development. Enable a zero emission power train for Heavy duty vehicles.



Solutions SE – Public transportation IT system

Onboard passenger information displays that enables the customer to share information with the passengers on the bus.

Public transportation users expect a quality of service. In case of delays or cancellations, they need real time information to re-plan, if necessary, how to arrive at their intended destination.



Sylog – Public transportation

Sylogs consultants are working with one of the mining train projects at Bombardier, INTERFLO offers comprehensive mainline solutions, from conventional to ERTMS Level 3.

Based on proven technology, INTERFLO provides major enhancements to capacity flexibility and availability. Bombardiers systems encompass integrated operation control and computerised interlocking systems, plus Automatic Train Protection (ATP) and wayside equipment. In addition, our solutions can be applied in mining and industrial applications.



Sylog – Manufacturing Industry

SKF's expertise is built on the development, design and manufacture of bearings, seals and lubrication systems. They we also provide machine health assessment, reliability engineering and remanufacturing services. Sylogs consultants are working within different areas at SKF that contributes to more effecient work at their facilities.



Epos Cat: Voluntary aid

This application is used to bring employees of a large corporation together with social institutions that need support from volunteers. This provides manpower of volunteers for social institutions.



Sylog – Better aviation

Jeppesen, a subsidiary of The Boeing Company. Sylog Consultants are working with systems for scheduling of airline crew for large airlines consists of very complex processes governed by flight and duty time limitations set by the regulators and unions.

Jeppesen has developed a unique capability to take human physiology into account during crew planning as represented by mathematical models. This capability is at the core of our suite of offerings in an area called Fatigue Risk Management that allows for our airline customers to not only fly safer but also with higher crew utilization. Also, the systems, developed at Jeppesen generates route optimizations in order to reduce fuel and make the flight more effient for both crew and passengers.



Epos Cat: Environmental Balance Tool

The application is used to create, manage and configure a environmental balance of a vehicle project. EPOS CAT developed this solution for one of its customers in the automotive industry. The application is used for a wide range of vehicle projects, using dismantling studies and environmental factor assessment to produce CO2 equivalents for the manufacture, use and recycling of vehicles.



The background of the slide features a blurred image of three people in a modern office setting, looking out of a large window. Overlaid on this image is a network diagram consisting of white dots connected by thin blue lines, suggesting a digital or organizational network. There are also several out-of-focus light circles in shades of red, orange, and blue scattered across the lower half of the image.

STAKEHOLDER ASSESSMENT

STAKEHOLDER ASSESSMENT

Identifying and selecting stakeholders

For this year's report we have identified and described the most important stakeholders for Data Respons. Key stakeholders are employees, clients, owners and suppliers.

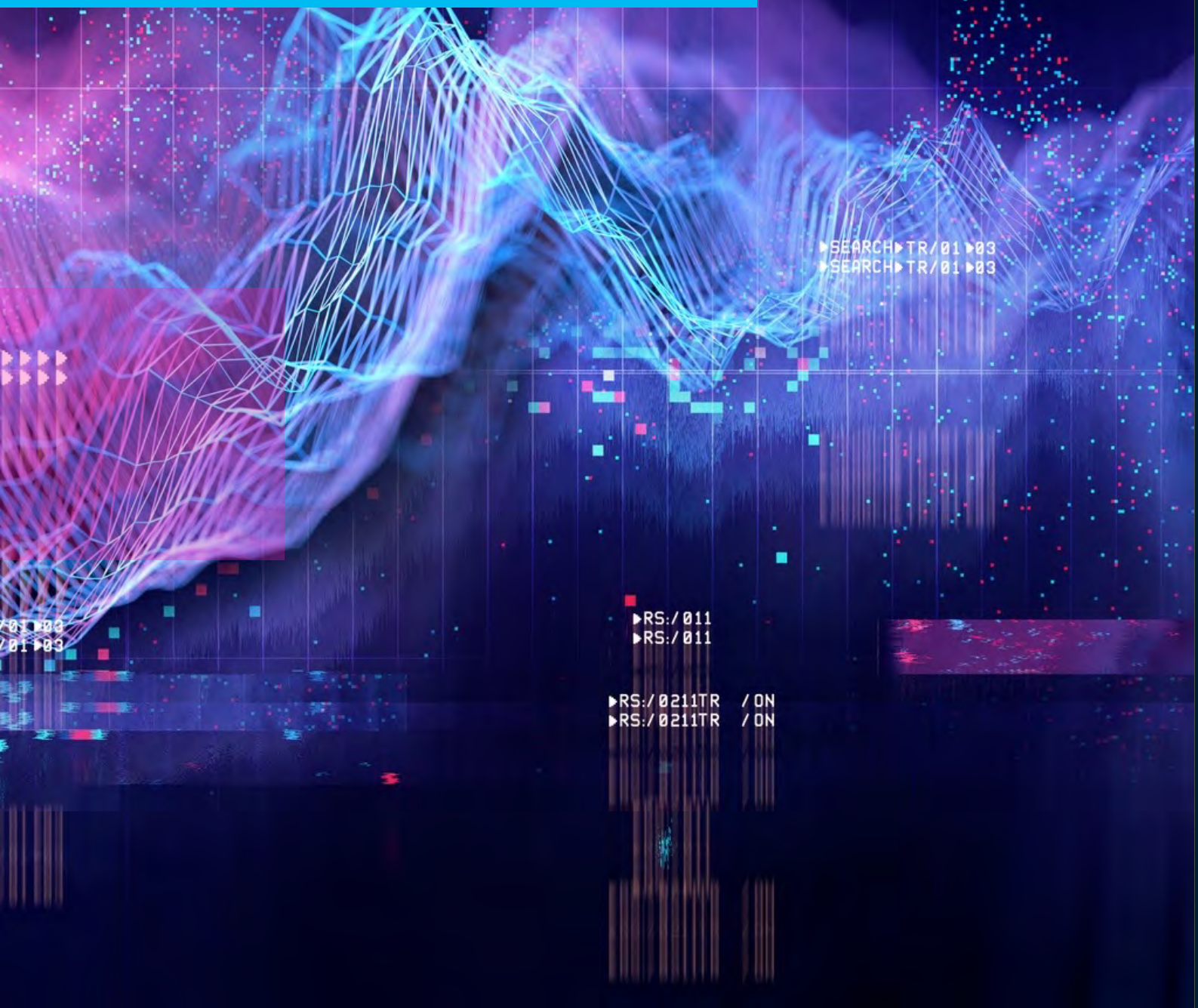
Stakeholder engagement

The table below presents the aspects that are usually the subject of Data Respons' engagement with each group of stakeholders, the communication and engagement methods used and how engagement affects Data Respons' operations.

For the 2021 sustainability report, the company will consider carry out external stakeholder dialogue and a materiality assessment according to the GRI Standards guidelines for sustainability reporting.

Stakeholder Group	Topics	Communication & Engagement	How engagement affects Data Respons' operations
Clients	<ul style="list-style-type: none"> Offering Quality Delivery performance Privacy and security Business ethics Working conditions Climate performance Procurement procedures 	<ul style="list-style-type: none"> Ongoing dialogue via Data Respons' subsidiaries and their key account managers and other sales representatives and consultants Client surveys Interviews 	<ul style="list-style-type: none"> Development of offerings and solutions Sales training Quality, environment and information security and management systems
Employees	<ul style="list-style-type: none"> Skills development Work environment Corporate culture Diversity and equal opportunity 	<ul style="list-style-type: none"> Employee surveys Employee interviews Interviews with selected focus groups Ongoing engagement through internal communication platforms 	<ul style="list-style-type: none"> Training and education Managerial conferences/seminars Employee events Communicating the principles in our Code of Conduct
Owners	<ul style="list-style-type: none"> Profitability and growth Responsible business Business ethics 	<ul style="list-style-type: none"> Board meetings Regular dialogue Regular reporting 	<ul style="list-style-type: none"> Code of Conduct ESG report
Suppliers	<ul style="list-style-type: none"> Suppliers' environmental work 	<ul style="list-style-type: none"> Suppliers' Code of Conduct Supplier audits 	<ul style="list-style-type: none"> Suppliers' Code of Conduct

MATERIALITY ASSESSMENT



▶SEARCH▶TR/01▶03
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MATERIALITY ASSESSMENT

The latest materiality analysis was completed in 2020 and essentially confirmed earlier assessments of the company's most material sustainability aspects. The analysis is based on mapping aspects in two dimensions.

First, the impact of various sustainability aspects of the external world was assessed. Second, the analysis identified the importance of sustainability aspects to Data Respons' stakeholders (in this case, employees and clients) when they make decisions linked to the business.

Material topics

Human rights are Data Respons' most important material sustainability aspect. The right to equal treatment (including equal rights and opportunities) is another aspect that stakeholders – employees in particular – considered more important, in addition to culture, leadership and skills development. The analysis shows that Data Respons' also needs to continuously address several aspects related to responsibility, environmental issues and compliance.

Information and data security are essential for Data Respons. We follow regulations for data security and GDPR.

MATERIALITY ASSESSMENT



DATA SECURITY AND INTEGRITY

As we detect and prevent thousands of attempts at cyberattacks every year, we are constantly developing our security efforts, in line with the external and internal threat picture.

We realise that advanced security solutions are needed to handle a wide range of cyber threats. Our foremost task is to protect our customers' data in compliance with relevant authorities and legal frameworks.

Data security and integrity are critical issues for the Data Respons Group for a number of reasons. In addition to existing country data protection regulations, the EU General Data Protection Regulation (GDPR) became effective on 25 May 2018. The GDPR regulates the protection of Personal Data (PD) that companies collect and process.

GDPR

Under the GDPR, Data Respons has firm legal requirements to protect against PD 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 PD 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.

Data Respons will continue to implement Information Security programmes aimed at improving the overall security posture of the company. The programmes will focus on both preventative and reactive measures to ensure Data Respons remains resilient to the rapidly changing threat landscape.

The background is a complex, abstract composition of various elements. It includes several line graphs with fluctuating lines, some in solid colors and others as dotted outlines. There are also pie charts, one of which is partially visible with segments in different shades. A large, semi-transparent blue circle with concentric dashed lines and a crosshair is prominent in the lower half. A black pen is positioned diagonally across the bottom right, pointing towards the center of the blue circle. The overall color palette is dominated by blues, purples, and pinks, with white and black text and lines providing contrast. Various numerical values are scattered throughout, some appearing to be financial data points or percentages. The word 'PERCENT' is written in large, bold, white capital letters in the lower left. The word 'BUDGET' is partially visible in the upper right. The main title 'Reporting on material topics' is centered in a large, bold, white font within a solid blue rectangular box.

Reporting on material topics

ENVIRONMENT



WHAT IS THE ENVIRONMENTAL FOOTPRINT OF THE TECHNOLOGY INDUSTRY?

The total life cycle carbon footprint of the ICT sector is approximately 730 million tonnes 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.

Data centers consume about 2% of global electricity today; by 2030, they could consume as much as 8%.

As for this report we have covered purchased electricity and purchased heating and cooling to report for our energy use. As we continue to improve our ESG-reporting, we will also consider cloud/ server footprint for the next reporting cycle.

As a technology company, our business areas are mostly focused on 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 directly and indirectly affect the environment by choosing sustainable technology projects.

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 and cooling offices with renewable energy.

Material use

Data Respons' material use in this report covers conflict materials. We aim to gain a complete picture of all materials Data Respons uses, and we have the goal to include materials like waste, iron, batteries etc. in the next report.

Energy use: purchased electricity, heating and cooling

As we started to map our greenhouse gas emissions in 2019, we realized that we still have considerably high use of energy across the group. At the same time, we see that energy use is one of the categories where we most easily can make a difference. Some of our subsidiaries have already switched to renewable energy providers and hence reduced their energy emissions.

Emissions



Emissions



Every year, Data Respons conducts emissions mapping across the group.

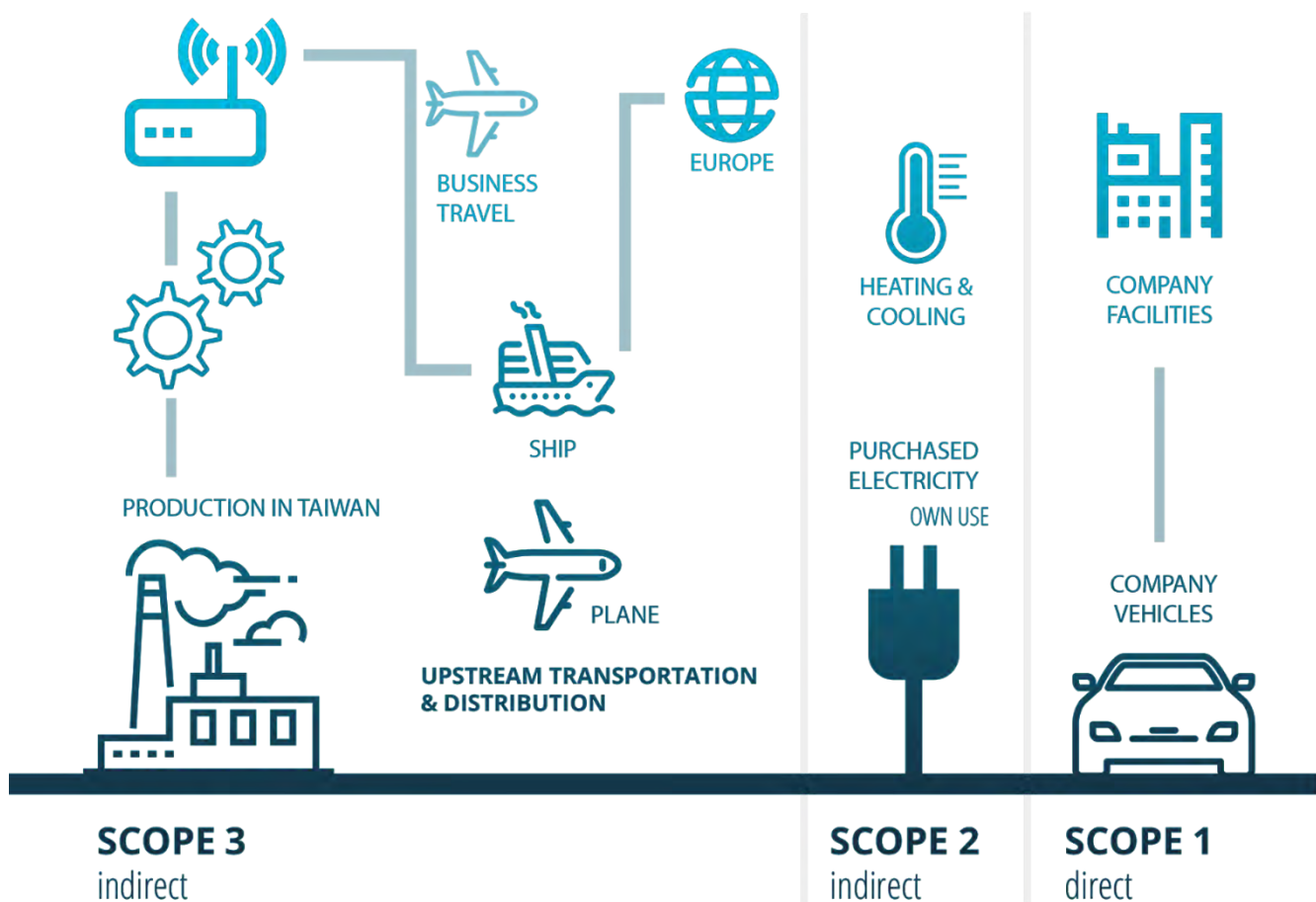
Our emissions report is derived from 2019 due to a delay in the data process. In our journey towards carbon neutrality, we have improved our emissions reporting and gathered extended data in 2020, compared to 2019. Consequently, we now see a much more detailed and probably more realistic picture of our environmental footprint.

Our emissions have increased considerably in this reporting period compared to the first reporting period. The reason is that we also included all Scope 3 emissions (production of technology and upstream transportation) in our second emissions 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 ([Endrava](#)) 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 (e.g. number of flights and routes, amount of electricity consumed, number of laptops purchased, etc.), factors for GHG emissions provided by various databases (e.g. $\text{gCO}_2\text{e}/\text{km}$, $\text{gCO}_2\text{e}/\text{kWh}$, $\text{kgCO}_2\text{e}/\text{kg}_{\text{bags}}$).



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. In 2020 we see that 70% of our group's emissions are in this category.

Transportation and distribution of own products

The second biggest emission part is transportation and distribution of technology products from Taiwan to Europe, and distribution within Europe. These emissions are also exclusively for Data Respons Solutions' customers and represents 11.3 % of our group's emissions. Both production and transportation or distribution of own products are the two biggest emission segments. This is linked to Data Respons Solutions and represent 80% of our total emissions.

Business travel

Business travel equals 5,2% of our total emissions. We have implemented in our sustainability strategy, that all domestic flights shall be reconsidered if absolutely necessary. If it's possible to take meeting digitally, this solution shall be preferred. Necessary flights shall be carbon-offset. This should always be the last option when a flight really cannot be avoided. Further, we request an individual travel policy in every daughter company.

Employee commuting

Besides production and transportation of technology, emissions from employees travelling to and from the workplace (by own fossil fuel-based or diesel cars), as well as company vehicles are a major part and stand for 7.3 % of the total emissions. When it comes to commuting, we see that the differences in geography and other work conditions are reflected in the individual needs for commuting.

In Germany, many employees live further away from the workplace and use diesel cars to get to work than in the Nordics. We also know that in some of the more rural areas in Germany, public transportation offers are not well enough developed to ensure everyone can use it in everyday life. Nevertheless, in some of our subsidiaries that benefit from being located in urban areas, employees get transfers for using public transportation.

Data Respons has the ambition to support their employees to choose climate friendly transportation, like public transportation, bicycles or electric vehicles. Further, we have a policy that when a subsidiary plan to move to a new office, it shall strive to move to climate neutral buildings.

NEARLY ALL EMISSIONS ARE SCOPE 3 EMISSIONS



More about the GHG protocol scopes at the [Method Slide](#).

- Scope 1** - Direct emissions
- Scope 2** - Indirect emissions from electricity and heat
- Scope 3** - Indirect (upstream) emissions from purchase of goods and services
- Scope 3** - Indirect (downstream) emissions from sold products

TOTAL EMISSIONS IN 2020



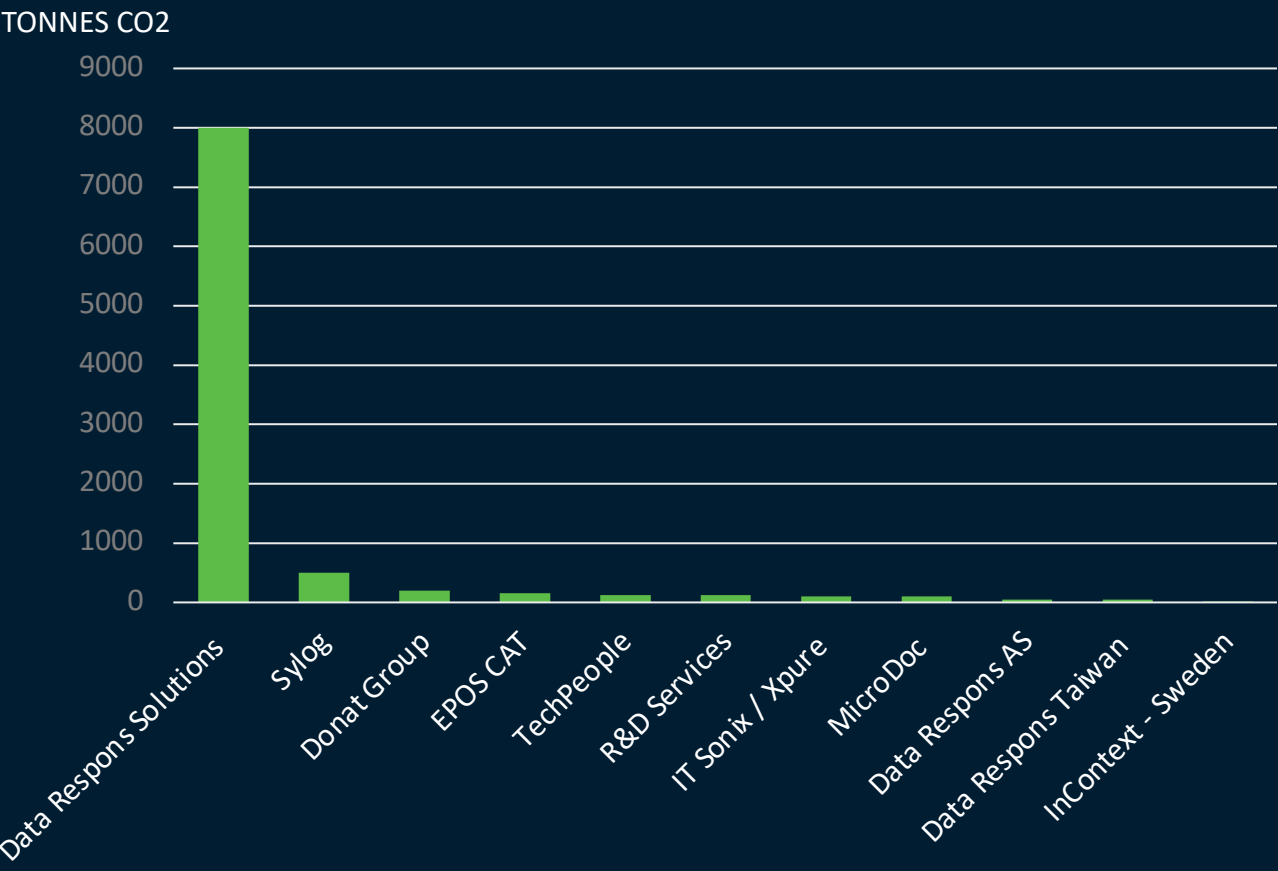
- Upstream transportation and distribution
- Employee commuting
- Business travel
- Purchased heating & cooling
- Downstream transportation and distribution
- Purchased heating & cooling
- Purchased electricity
- Waste generated in operations
- Company vehicles
- Purchased goods and services

=
4 896 return flights
between Oslo and New York

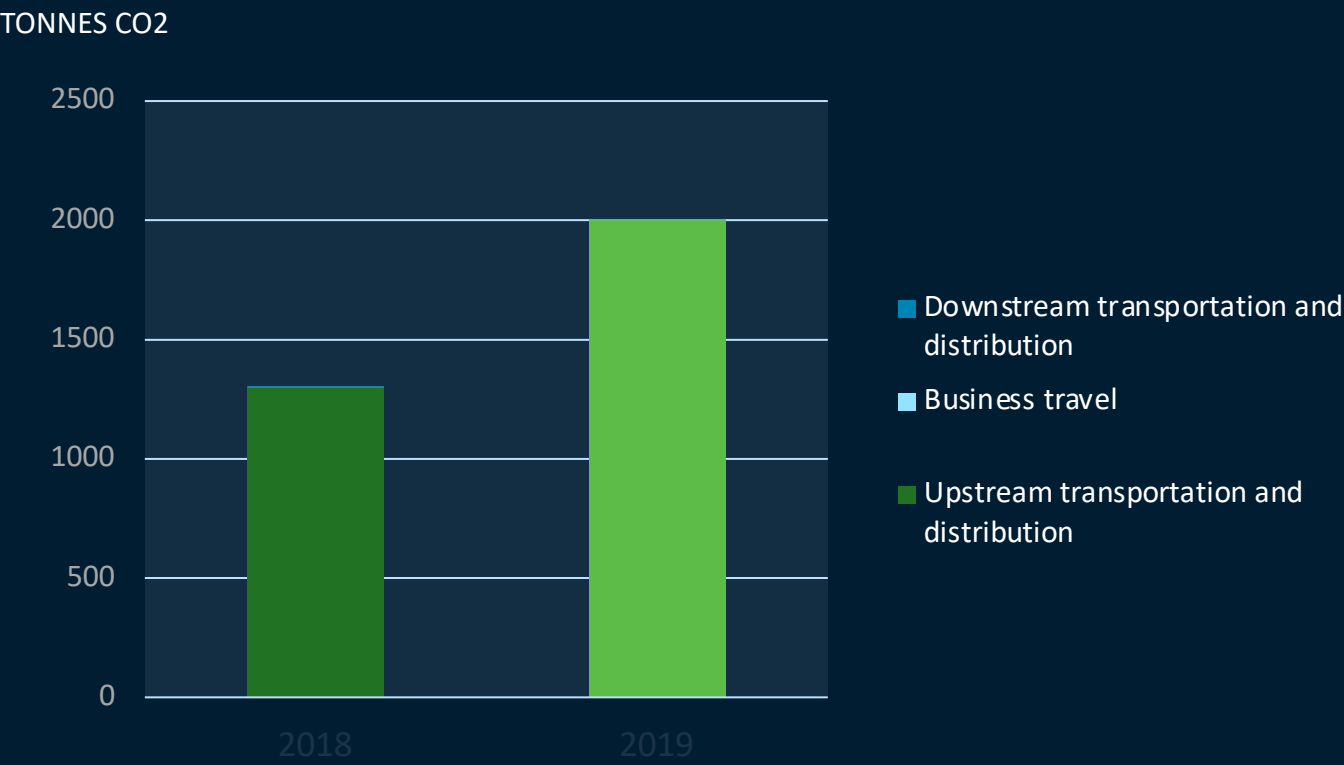
OR
the yearly emissions of
4 652 cars

OR
the yearly footprint of
930 Norwegians

LARGEST EMISSIONS (86%) FROM DATA RESPONS SOLUTIONS



COMPARING GHG EMISSIONS FROM 2018 AND 2019



Energy Use



ENERGY USE

Data Respons' second most significant impact on the environment is through energy use. Consequently, we have the ambition to switch to 100% renewable energy for purchased electricity for all offices. This project started in 2020 and two of our daughter companies, Epos Cat and IT Sonix have already reduced their footprint considerably by buying energy solely from renewable sources. Further, we are researching possibilities for renewable energy sources for production of technology in the whole technology value chain.

Furthermore, we do several actions our own:



Purchase renewable electricity for the energy supply in our offices



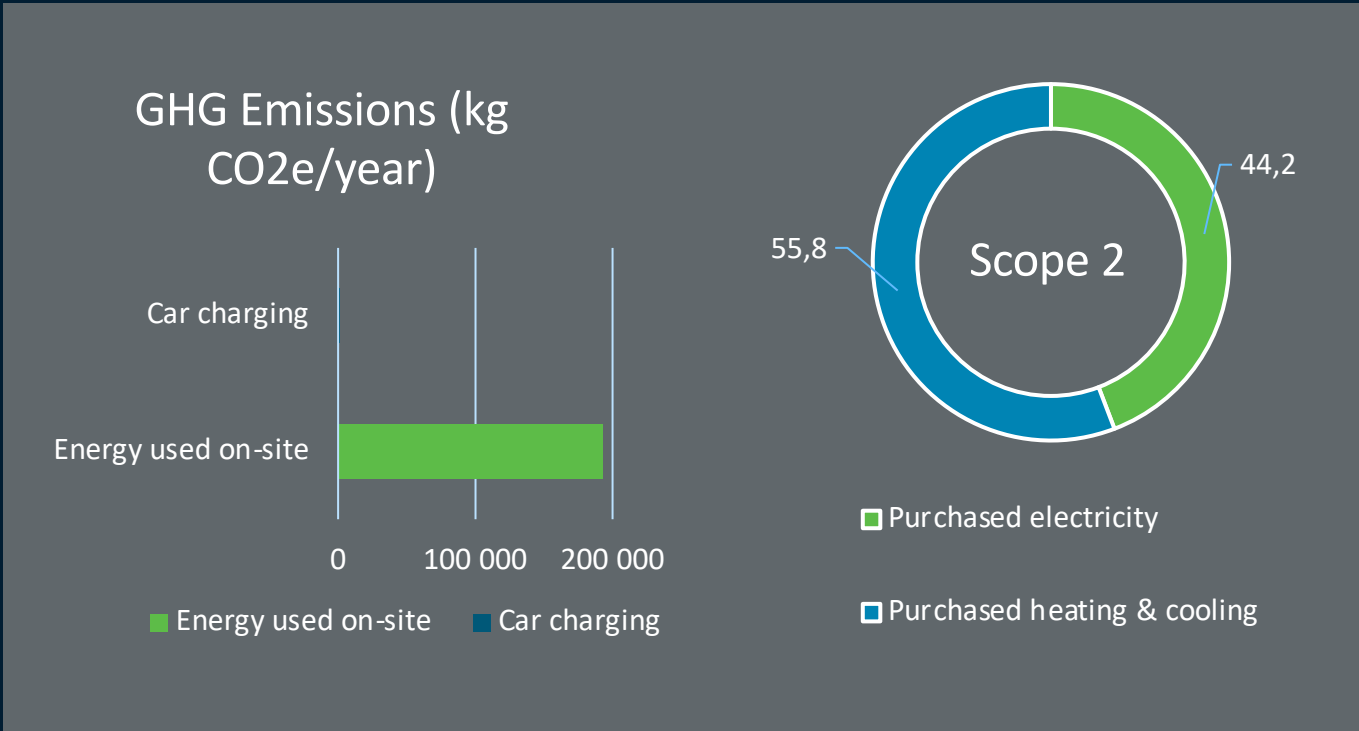
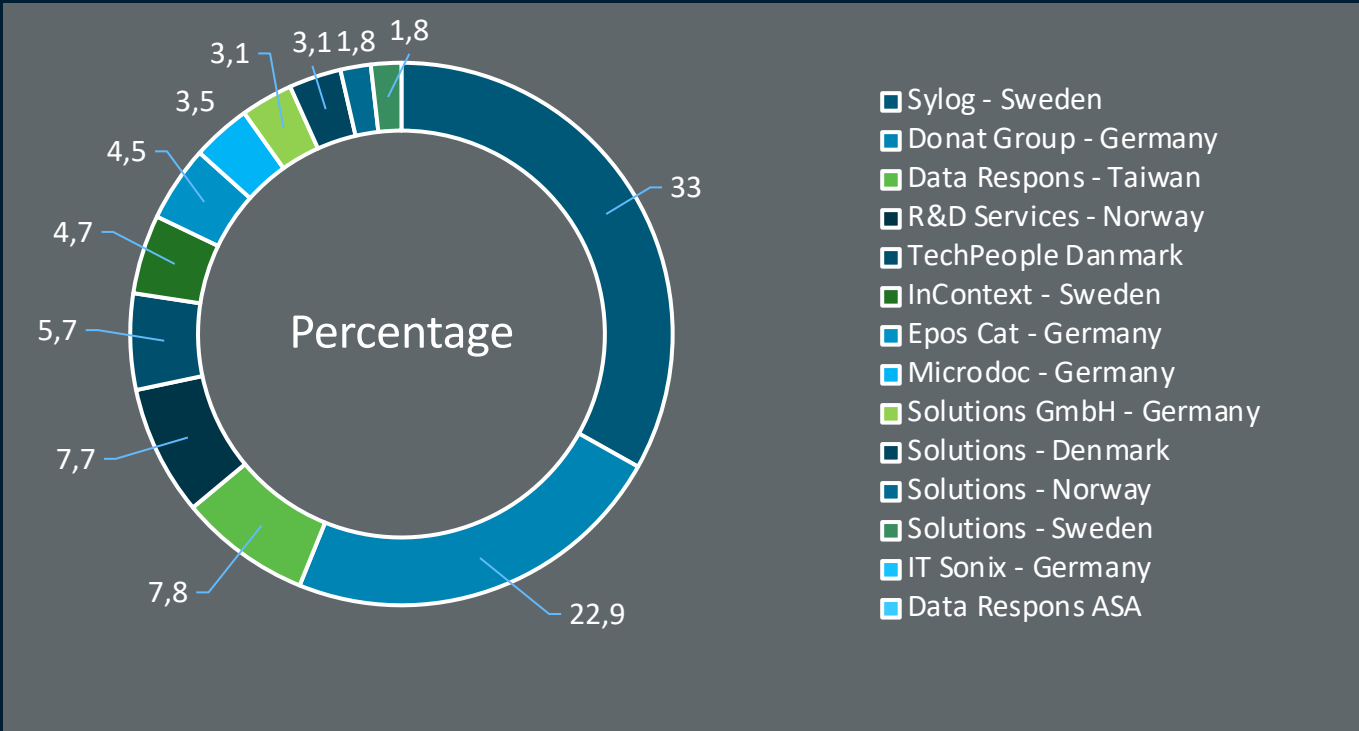
Smart heating/ cooling system that switches off in vacations/ weekends



Switched to energy efficient lightning

	2019	2020
Scope 1	131 843 kg CO2e/year	104 400 kg CO2e/year
Scope 2	281 458 kg CO2e/year	193 523 kg CO2e/year
Scope 3 - downstream	6 352 kg CO2e/year	279 589 kg CO2e/year
Scope 3 – upstream	962 689 kg CO2e/year	8 725 953 kg CO2e/year

ENERGY USE



Materials



MATERIALS

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. We have the goal to include materials like waste, iron, batteries etc. in the next report.

We have started to implement eco design for our Solutions products.



WE AIM TO :

- to follow up production in Taiwan and



- Increasingly 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.

SOCIAL



Creating a positive and professional culture

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.

The company is dependent upon its capacity to attract and recruit skilled employees and upon its employees to maintain their skills, continue to develop and stay motivated. There is high demand for qualified labour and the company needs to be among the best to recruit employees to a sufficient extent. High employee turnover or loss of key people could therefore have negative impact on the company.

Creating a positive and professional corporate culture is an important value at Data Respons. Our employees are our most important resources and as employer, we see it as our responsibility is to make sure they have the best possible working conditions.

The technology industry is still characterized by a low employee percentage of women. We take our responsibility seriously to actively promote diversity and equality and work continuously to promote a diversified staff, equal opportunities and pay and create a healthy work environment.

Data Respons' organization represents significant diversity in education, experience, gender, age and cultural background.

We see this diversity as a source of competitive advantage, as it encourages innovation, learning and better customer understanding. Our ambition is to have a high performing and sustainable work environment, based on diversity and inclusion.

Positive and
professional
corporate culture



POSITIVE AND PROFESSIONAL CORPORATE CULTURE

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.

Positive and attractive work environment

Data Respons is truly a tech and customer driven company, based on a people-centric culture. We strongly believe in a decentralised 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 individualised 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 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:

Training facilities and workouts at the office

TAKING RESPONSIBILITY:

Sponsored bikes/ e-bikes to promote sustainable commuting

TO PERFORM:

Lifelong learning (academy, study programs etc.) Sharing knowledge on our internal communication platform.

HAVING FUN:

Team building, weekly social gatherings and e-sport events.

POSITIVE AND PROFESSIONAL CORPORATE CULTURE

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 for working environment/ safety representatives. Therefore, each subsidiary is responsible to manage their working environment committee or appoint 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 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. In the Data Respons group were in total two work related injuries reported in 2020. None were considered serious.

15,9%

TURNOVER
in 2020

2,6%

SICK LEAVE

2

**WORK RELATED
INJURIES**

Equal treatment



EQUAL TREATMENT

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 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 behaviour to their immediate supervisor or the employee representative.

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.

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 organisation based on the principle of equal opportunities.

DATA RESPONS STRATEGY FOR DIVERSITY

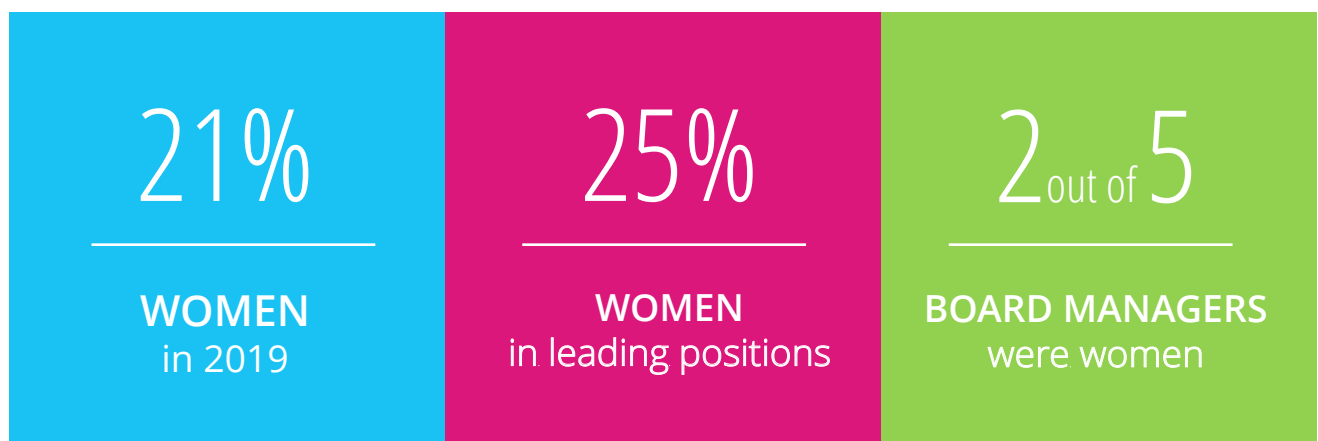
Diversity, with respect to both gender and ethnicity, can offer significant competitive advantages. Although achieving a gender balance is challenging in a world with few female computer science engineers, the group works to promote the profession among young engineers and strives to increase the share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

“Promoting a better gender balance in a male dominated industry is one of our key priorities.”

We increased the number of women from 17% to 21% in 2019, however, this number dropped to 19.8% in 2020 due to a reduction in employees during Covid.

The share of women was 25% percent in Data Respons' management positions. With two women among the five shareholder-elected members on the Board of Directors, Data Respons complies with the Norwegian legal requirements on female representation.

All dimensions in diversity are important to us, but since we work in a male dominated business, we focus especially on gender and attracting women to tech professions.



Skills development



SKILLS DEVELOPMENT

Employee development

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 organisations. 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 to Data Respons values.

A woman with dark hair and glasses is shown in profile, looking at a computer monitor. The background is a server room with blue lighting and server racks. A large blue rectangular box is overlaid on the right side of the image, containing white text.

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 as well as AKKA offers AKKADEMY 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.

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 Data Respons have 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

An estimated 617 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

helping children across the nations. One of them is The Society for Street Children in Nepal, a non-profit fund-raising society working for the accommodation for street children in Nepal, with 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 still living on the streets.

Another example is the humanitarian organisation “On Own Feet”, which works with children in war-torn countries. The organisation provides school materials, builds and reconstructs schools, provides medical kits to women’s clinics and more. 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 have been an important part of the culture in Data Respons. 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: namely team spirit, a clear strategy and, above all, a large portion of emotion and pure passion for a common cause. Data Respons companies sponsor both small local teams and youth national teams within various sports such as cycling, ice hockey, football and hand ball.

GOVERNANCE



GOVERNANCE

Building trust through good corporate governance is key and part of the licence 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 scheduled supplier audit as soon as possible, most likely after the pandemic when travelling to Asia is possible again. The Supplier Code of Conduct sets out the minimum standards in key areas including business ethics and anticorruption, as well as human rights, labour 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 includes 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. Normally, concerns and complaints should be raised with the employee's superior. However, if the employee is uncomfortable with that, he or she may raise the issue with human resources, HSE (health, safety and environment), a union/safety representative, compliance, legal or internal audit. The employee can also use Data Respons' whistle-blower channel, where concerns can be reported anonymously. Examples of concerns that can be addressed in the whistle-blower channel are for instance fraud, deceiving employees, corruptions, or any other act that misleads employees.

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

Responsible purchasing



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.

We continue to optimize our supply chain and production processes to make sure our products are produced with the least possible CO2-emissions.

A part of this process is to look into purchased energy for technology production and what possibilities we have to influence there. We also seek to select products that are sustainable over time in that, for example, all or part of the product can be reused.

Legal and appropriate conduct

00619271
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405850
6364
322612
206225
33746
2501
4363
822
359
65



LEGAL AND 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.

This information can be found in the [Code of Conduct on our website](#).

Independence and political affiliations

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

FIND MORE INFORMATION IN OUR
[Code of Conduct on our website.](#)

Human rights



HUMAN RIGHTS

Modern Slavery Act

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.



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



**Goals and
ambitions
2021**

GOALS AND AMBITIONS WITHIN ESG

Environmental:

- 100 sustainable projects
- Improve mapping of materials to include all used materials
- Change energy supplier to renewable sources
- Continue implementing our sustainability strategy across the group
- Set up concrete actions plans for every daughter company on how to become CO2 neutral by 2025

Social:

- Increase the gender balance up to 25% women
- Maintaining diversity or increase the mix of nationalities.
- Continue to strengthen a culture that creates an international and attractive work environment and our recruiting efforts in 2021.
- Use our sponsorships under the concept of Enabling the Young, to actively promote the next generation, and especially encourage and help girls into the tech industry.

Governance:

- Revise the company Code of Conduct
- Using our purchasing powers to draw our suppliers in the right dimension and promote ESG in value chain
- Conduct sustainability audits at largest suppliers in Taiwan during 2021

2025

**Reach CO2-
neutrality**

40%

**Women in the
management
by 2025**

(long term goal is 50%)

25%

**Women in the
total workforce
by 2021**

(long term goal is 50%)

2021

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

KEY ACTION POINTS AT DATA RESPONS



Connecting with the right partners

We have the ambition to choose networks and organizations that force us to focus on reducing our footprint, choosing green tech projects and build a well-known brand in Europe. We have for instance joined forces with UN global compact, Guide against Greenwashing and Choose and the German/Norwegian chamber of commerce.



Mapping emissions

We will continue to measure and map our CO2-emissions and report on them annually. Consequently, we ask every daughter company to appoint one or several sustainability ambassadors, that will contribute in this process.



Using our purchasing power

We plan to send letters to our suppliers, demanding that they follow our suit on sustainability or that they have implemented similar guidelines concerning sustainability.



Joint offsetting platform

Establishing one relationship with one carbon credit supplier across the company



Carbon budgets

Every company gets a decreasing carbon budget.



Ramping up internal communication

We believe that internal engagement and accept for our ambitions are crucial for reaching them. So, we plan to communicate regularly on the progress and be transparent on emissions and challenges. Our focus lies on building awareness and creating support for actions to decrease carbon.



Prioritising communicating green projects

We are working to identify projects with a value on one or several of the UN sustainable development goals.



Reduced air travel

Every Data Respons company develops their own travel policy that aims at reducing air travel. As every company has different needs and local conditions, there is no one size that fits all – solution.



ESG outlook 2025 targets

CARBON NEUTRAL
BIG GREEN BUSINESS
SUPER ATTRACTIVE BRAND
A PUBLIC PLAYER
ABOVE STANDARD
A NET POSITIVE CONTRIBUTOR

CLOSING REMARKS BY THE ESG TEAM

ESG is important to us for several reasons: We believe in our impact to sustainability through technology. We have unique possibilities to enable solutions that save resources, enable more equality and better life quality. We already see that speeding up in this direction is a real competitive advantage, and we aim to be among leading companies in the green transition.

Ambitious targets are being set in every industry, even in those that are still dependent on producing fossil-based products or those with massive global value chains. Large tech companies, like Microsoft and Apple are launching comprehensive carbon reduction plans: [Microsoft plans to become carbon negative by 2030](#) and [Apple commits to be 100 percent carbon neutral](#) throughout its supply chain and products by 2030.

Consequently, in 2019 we decided to set our own ambitious target to become carbon neutral by 2025. However, as we have come closer to reaching that target it's obvious that there are a set of ambitions connected to becoming carbon neutral. In the next four years we believe a lot can be done in making parts of the world better and our company and all entities better.

A crucial part of being able to reach that target is making sure everyone (or at least a big majority) is onboard. To achieve this, we have executed sustainability action workshops with all subsidiaries, and we have started the workshops with drawing a picture of where we see Data Respons in 2025.

Our (bold) vision

In 2025, we will have reached carbon neutrality and hopefully established a circular value chain in our operation.

This makes us a super attractive brand that attracts the most talented employees, we have a low turn-over and our employees are highly motivated to use their expertise. Furthermore, we have turned into a big green business and consequently, we attract big international customers by delivering green technology. As we have become a net positive contributor, we contribute actively to the green shift by choosing the right projects.

In addition, we will also attract public customers as we will be able to meet the demands to choose sustainable suppliers. Finally, we will become a public player that plays an active part in society by enabling the young and the digital transition. In total our 2025 ambition will increase our attractiveness, reduce our risk exposure, and ensure that we continue the fantastic journey Data Respons has been on for the last 20 years.

Ramping up the measurements

Measuring the total amount of carbon our products and services generate creates a much better understanding of our actual carbon footprint. It also allows to engage more parts of our value chain. Thus, creating more change. Yes, it makes everything more difficult, but this is not about taking the easy road. This year we have gone a step further in measuring our carbon emissions. Last year we measured Scope 1 and 2 for the first time and this year we have also measured a complete Scope 3 picture.

Not just reporting

Through our ESG-reporting we have learned that our family of companies in many cases consists of champions of green growth. Every year we are mapping the number of customer projects that directly affect the SDGs. Year after year the number of green projects are increasing. As digitalisation is becoming the key factor in any sector, our companies are branching out and increasingly working on projects related directly to sustainability. This report enables us to regularly map relevant projects and understand how large our combined positive footprint is. Changing the company, one report at a time. This is because reporting puts important issues on the agenda and thus creates more awareness among our employees. It's a well-known cliché that what gets measured gets done, and our reporting routines ensures that we track progress, discover challenges and get an opportunity to connect and discuss how to be better with our colleagues.

A lot of effort goes into this report. A report that will not be read by everyone or go viral. That's not the point either. This report is for those who care, who are interested and for those who need as a tool to lead, manage, deliver and act.

Appendix: Risk assessment



RISK ANALYSIS

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.

RISK ANALYSIS

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.