BRIEF WHAT IS NORWAY'S TRANSPARENCY ACT?

Norway's Transparency Act came into force on July 1. 2022, and applies to larger enterprises 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, and that are liable to tax to Norway pursuant to internal Norwegian legislation.

The Act requires that we:

- 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.
- Explain our work with due diligence assessments related to human rights and decent working conditions.
- Publish our findings on the company's website.
- Respond to information requests from the general public.

At Data Respons we are convinced that compliance regulations will positively reinforce the way we work in terms of responsible business conduct.

We will apply the same standards for ourselves as we do for our suppliers and business partners.

How we work with 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.

Public pressure and international regulators are holding companies responsible not only for their own actions but also for those of their suppliers. 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 recognise 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

Due Diligence

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.

This report is structured into six steps that follow the guidelines for the Transparency Act:

- 1. Embed responsible business conduct into policies and management system
- 2. Identify & assess adverse impact in operations, supply chain & business relations
- 3. Cease, prevent or mitigate adverse impacts
- 4. Track implementation and results
- 5. Communicate how negative impacts are addressed
- 6. Provide for or cooperate in remediation when appropriate

