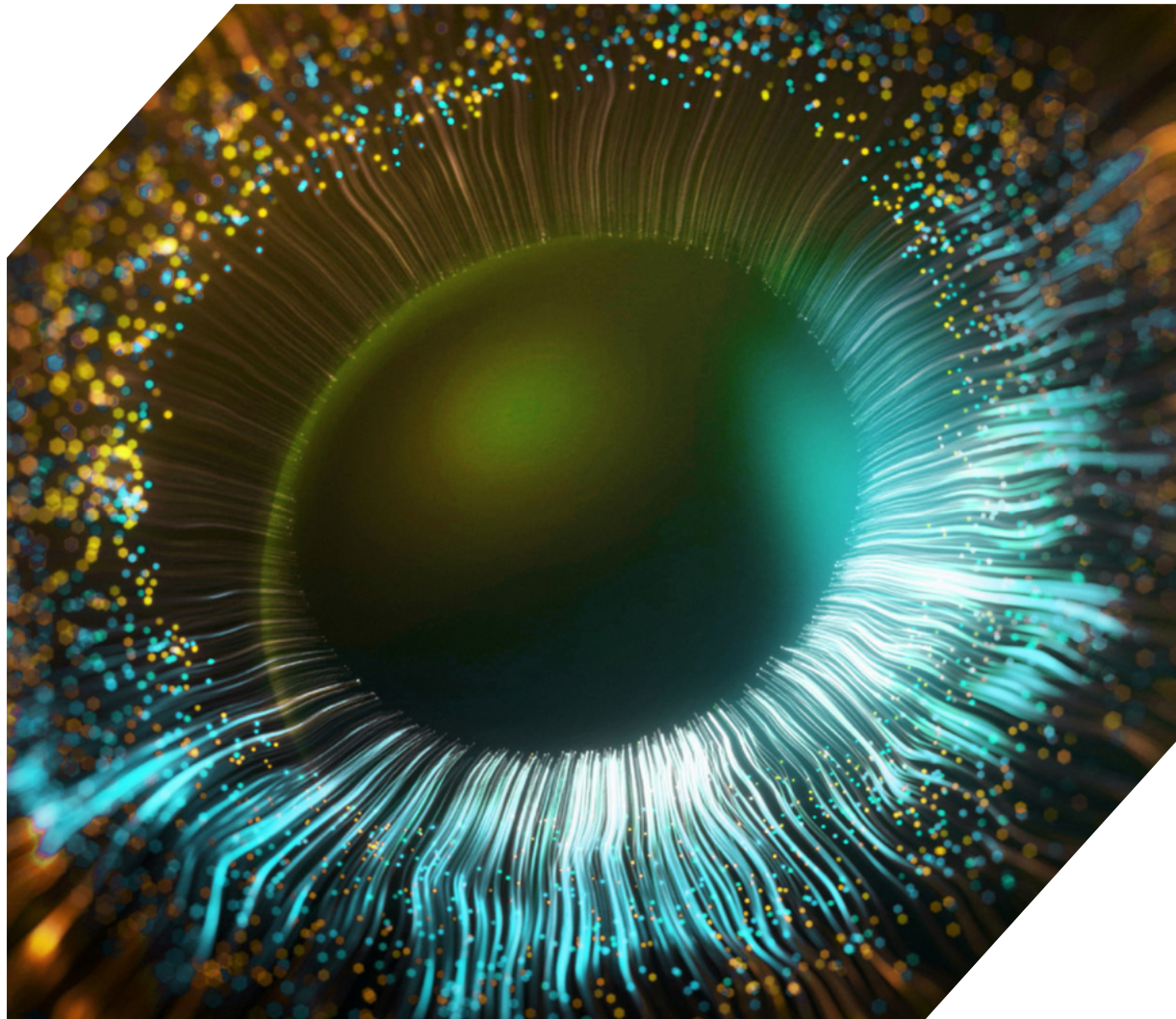


2023 |

Transparency Act

Risk Assessment

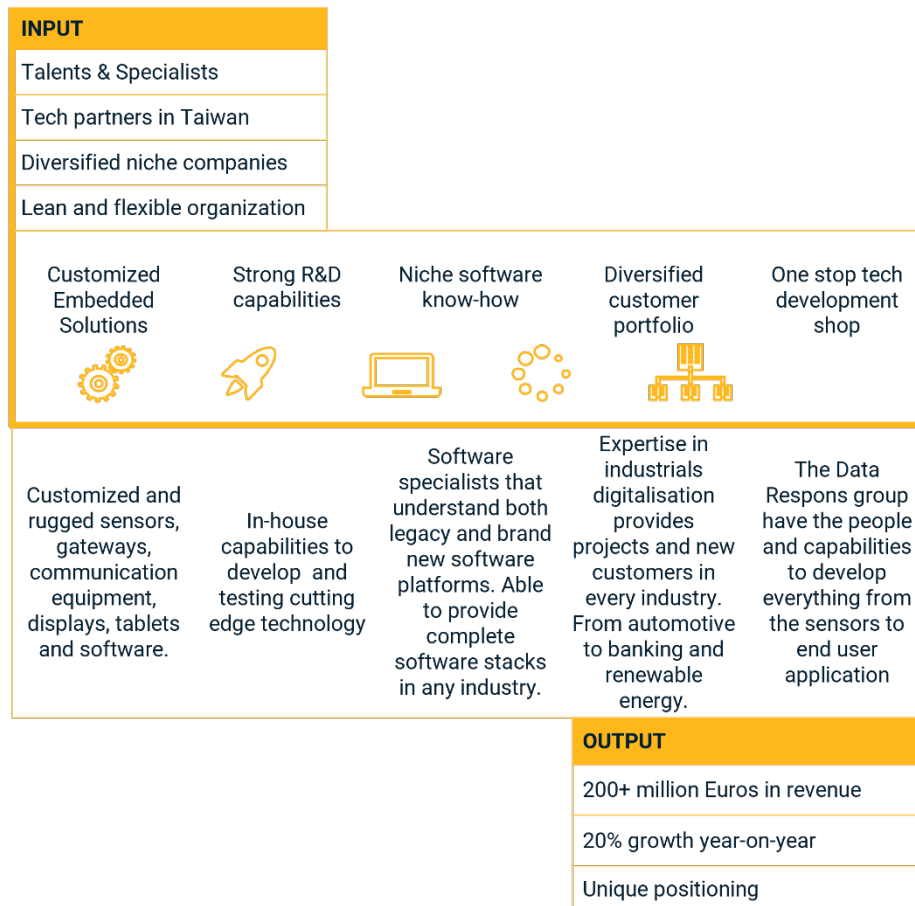
Risk assessment of labour rights violation in the Akkodis Group Nordics, and subsequent actions



1. Our Value Chain

Akkodis Group Nordics AS 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 app's, making us a good partner for our customers in their digital transitions. We can provide a complete competency platform during a development project.



2. How we work with human rights

Respecting human rights is a fundamental part of Akkodis Group Nordics' 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 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

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 labour union.
- We conduct our activities without discrimination, we treat our employees fairly and compensate fairly by offering a 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 Conduct Principles, which our suppliers are obligated to follow. Suppliers must abide by the same rules as those we have laid down for our own employees.
- To meet new regulatory requirements and reduce risk, we have implemented Integrity Next's cloud-based platform to enforce and monitor compliance and sustainability throughout our supply chain.

Procedures to handle violations of human rights

Ethical guidelines

In 2019 we made a comprehensive Code of Conduct that was launched in 2020 together with an updated whistle-blower service. The Akkodis Group Nordics' 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 Akkodis Group Nordics' suppliers. Failure to comply with these requirements may result in the termination of the business relationship.

Breaches of the Code of Conduct

Everyone at Akkodis Group Nordics has a responsibility to speak up promptly about ethical issues and suspected violations. Normally we urge employees to discuss their concerns and complaints with their superior. If, for any reason, they feel uncomfortable reporting concerns to their supervisor, or if they believe their supervisor has not appropriately addressed a concern, they may also raise their concerns to:

- Their supervisor / manager's manager
- Their union representative / safety representative
- Their local manager
- Their member of human resources

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 Akkodis Group Nordics' whistle-blower channel, where concerns can be reported anonymously.

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

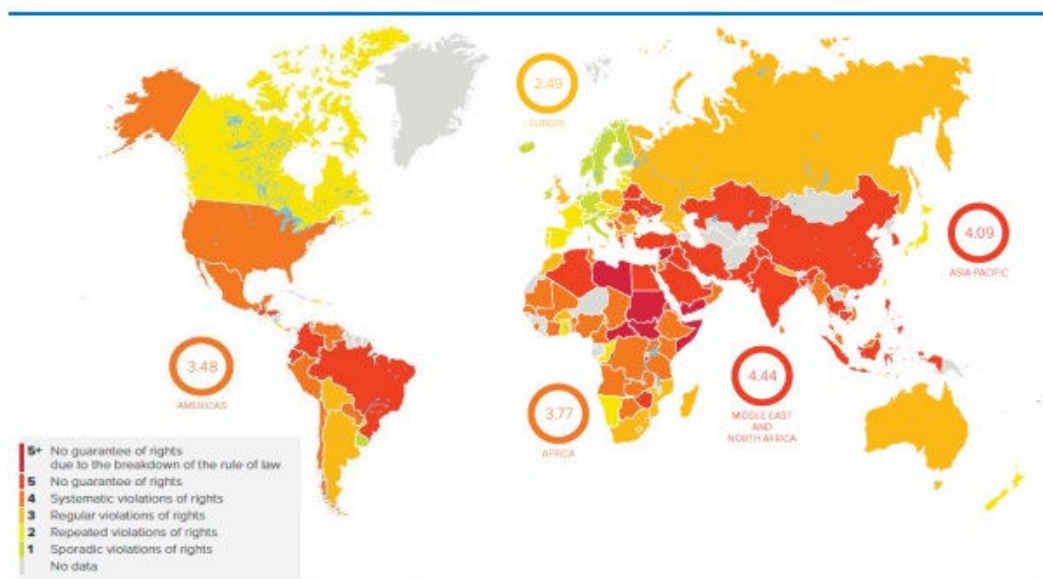
Information about whistle blowing can be found in our Code of Conduct that is available on www.akkodis-nordics.com.

3. Geographic risk assessment

- Nordics and Germany ranked as low as possible on risk of violating labour rights.
- Taiwan ranked with slightly higher risk of violating labour rights.
- Since Akkodis Group Nordics does not operate in any high-risk areas we assess that there is a low risk of labour rights violation in our own organization.
- Our work is mainly project management, software coding or limited hardware testing/assembly. Hence our employees do not work in what we assess as risk exposed environments.
- We do have suppliers in China, which is considered to have working conditions without any guarantee of working rights being upheld. We therefore recognize that there is a serious risk of labour rights violation in parts of our value chain.

Assessment of a country's degree of respect for labour rights

Scale from 1 to 5+ where 1 is low risk for violations of labour rights ("sporadic violation of rights") and 5 are very high risk of violations labour rights ("no guarantee of rights")



Kilde: International Trade Union Confederation, 2020

4. Other risk assessments discoveries

- The knowledge of our Code of Conduct is not adequate. Not all employees confirm that they know where to find it or if they have read it.
- Both local managers and employees would like an internal learning program on relevant topic within ESG, including personal data protection, human rights, ethical working conditions etc.
- There was zero whistle-blowing cases in 2021, and no other reported incidents of any breach of our Code of Conduct from our local operations.
- There were two minor work-related injuries in 2021 (two people crashed on their bicycles on their way to work).

5. Actions to reduce risk of labour rights violation in our own operations

- Continue to distribute and make sure our employees know and understand our Code of Conduct, and our whistle-blower service.
 - Expected result: 80% of all employees that have access should know about the handbook.
- Launch an internal learning program on ESG, including human rights in 2022.
- Expected result: 50% of all employees that have access should have done the learning modules.
- Continue to map employee job satisfaction through yearly anonymous employee surveys.
- Ensure that all employee contracts are up to date and include our policies on human rights.
- Expected result: 100% of all new employee contracts are updated.
- Ensure that our staff handbook is up to date on human rights and labour rights, and that its known throughout our organization.
- Expected result: 80% of all employees that have access should know about the handbook.
- Continue using our supplier auditing system where suppliers from Taiwan area obliged to document how they adhere to human rights and our Supplier Conduct Principles.
 - Expected result: 100% of all large supplier are audited out in our auditing system.
- Conduct extensive supplier audits in Taiwan in 2022, in addition to the supplier audits done locally in Taiwan every year.
 - Expected result: 100% of all large suppliers are subjected to a visit from Akkodis Group Nordics representatives.
- Include Chinese suppliers in our Integrity Next's cloud-based platform to enforce and monitor compliance and sustainability throughout our supply chain.
 - Expected result: 100% of all large Chinese suppliers are included in our auditing platform.
- Investigate the possibilities for engaging with a credible third party that can run suppliers audits in China.

Read more about our relevant policies for Quality, Environment, Occupational, Health and Safety at <https://solutions.datarespons.com/about-us/qhse/>.

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goes beyond possible, to make incredible happen.

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