

# Transparency Act Due Diligence Report

Compliance, standards, and regulations can be complex and are constantly changing. Their intention is holding companies not only responsible for their own actions but extending it to throughout their supply chain.

# NORWAYS 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.

## About Data Respons

Data Respons is a growth company and a pure-play digital leader with an in-depth expertise in software development, R&D services, advanced embedded systems and IoT solutions.

We provide R&D services and smart embedded solutions to OEM companies, system integrators and vertical product suppliers in a range of market segments such as Mobility, Industry Automation, Telecom Media, Space, Defence Security, MedTech, Energy Maritime and Finance and the Public Sector. Data Respons' headquarter is located in Oslo, Norway, and has subsidiaries and offices in the Nordics, Germany & Taiwan. Data Respons employs has more than 1 550 employees and 18 offices throughout Europe and in Asia.

In early 2022 the company became a part of Akkodis, a global tech engineering company.

# I. EMBED RESPONSIBLE BUSINESS CONDUCT INTO POLICIES AND MANAGEMENT SYSTEM

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. These companies are:

- Data Respons Solutions AS (December 2022)
- Data Respons R&D Services (December 2022)
- Akkodis Norway AS (December 2022)

Akkodis Norway AS adopted routines for responsible business conduct in December 2022 and has fulfilled its obligations prior to the sale.

Akkodis Norway AS has an independent obligation by law, and their former owner, The Adecco Group, will carry out a separate due diligence assessment and will publish these on their website by June 30, 2023, as well as on datarespons.com.

Data Respons Solutions AS, Data Respons R&D Services and Akkodis Norway As are all certified according to Quality (ISO 9001) and Environment (ISO 14001).

The Bord of Directors will be updated on the work and progress with the Transparency Act annually.

## The Management Systems

The Management Systems are owned by the General Managers in each compliant company and the operational work is executed by the Quality Managers. Department Managers support the organisation with implementation, competence building and continuous improvement processes.

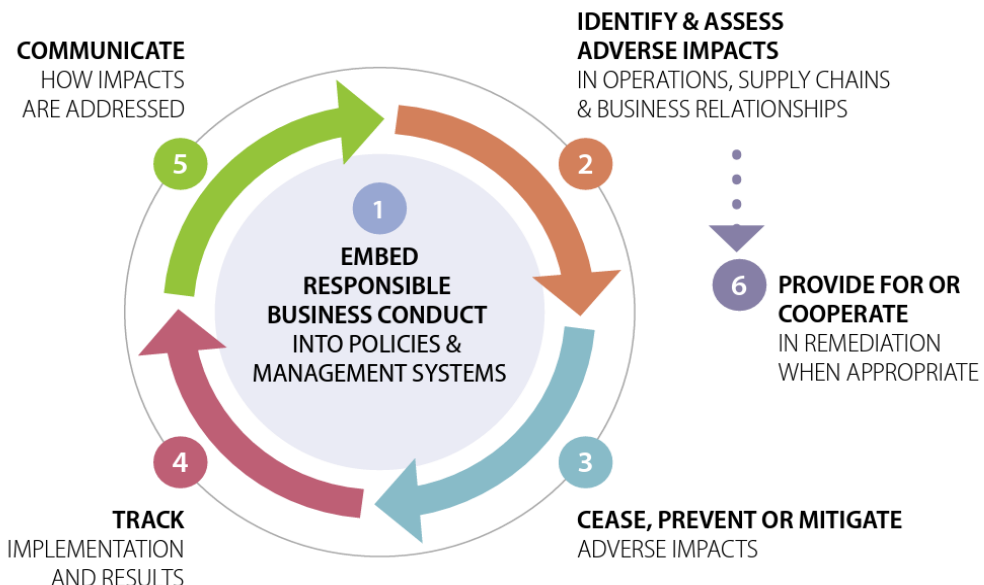
### We have already:

- Started work to embed the Transparency Act into our Management Systems
- Revised and published our Code of Conduct
- Purchased a Supply Chain Risk Management Platform to ensure and monitor compliance in our supply chain
- Created a HSE Policy
- Launched internal management system training
- Launched an internal e-learning ESG module

### We are planning to:

- Revise the Supplier Conduct Principles
- Have the revised Supplier Conduct Principles signed by our suppliers and business partners
- Conduct third party supplier audits in Taiwan
- Further embed the Transparency Act into our management system and guidelines.

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, our suppliers, and business partners.



## 2. IDENTIFY & ASSESS ADVERSE IMPACT IN OPERATIONS, SUPPLY CHAIN & BUSINESS RELATIONS

Data Respons has begun assessments to uncover risks of breaching of decent working conditions and human rights in own business, business partners and supply chain. Risk assessments are carried out in accordance with our established routines for risk management and in the following prioritisation:

- Supply chain
- Business partners
- Own business

Prioritisation is based on where we perceive the highest risk of breaches.

### Risk evaluation

Data Respons must have high ethical standards, and a low tolerance towards adverse impacts on basic human rights and decent working conditions in our own business, in the supply chain and with our business partners. An overall risk evaluation in our supply chain and business partners is based on:

- Industry
- Scope
- Geographical area: Norway, the Nordics, EU, Type of risk: HSE, working hours, wages, organisation, forced labour, equality, child labour, discrimination etc.
- Whether or not the company has been assessed by an intermediate supplier or certified by a third party.

Data Respons does not perform risk assessments of suppliers or business partners who we have no written agreement with or who we have agreements with of less significant value.

Our own organisation is evaluated based on:

- Complying to applicable laws and regulations
- Our own ethical guidelines
- Feedback from employee surveys
- Dialogue with our employees

### Assessment of the supply chain

We carry out risk-based integrity due diligence processes to ensure that the business partners' reputation, background and abilities meet our standards. All our 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.

Most of Data Respons' supply chain is in Taiwan whose country risk is ranked slightly higher than The Nordics and the EU in terms of violating Labour Rights.

Human rights are Data Respons' most important material sustainability aspect. 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.

Based on the Human Rights Index by V-Dem that captures to which extent people are free from government torture, political killings, and forced labour, whether they have property rights, and enjoy freedom of movement, religion, expression, and association. The variables ranges from 0 to 1 (most rights).

Sweden	0.97 (Low risk)
Denmark	0.96 (Low risk)
Germany	0.95 (Low risk)
Norway	0.94 (Low risk)
Taiwan	0.93 (Low risk)
USA	0.93 (Low risk)
Netherlands	0.92 (Low risk)
China	0.17 (High risk)

Suppliers and business partners are expected to be committed to upholding the labour rights of workers, and to treat them with dignity and respect as understood by the international community. According to the Global Rights Index (ITUC). On a scale from 1 to 5 this is how our supply chain scores.

Nordics	1 (Sporadic violations of rights)
Germany	1 (Sporadic violations of rights)
Netherlands	2 (Repeated violations of rights)
Taiwan	2 (Repeated violations of rights)
USA	4 (Systematic violations of rights)
China	5 (No guarantees of rights)

Should due diligence assessments uncover suppliers or business partners with high risk of adverse impacts on basic human rights and decent working conditions, Data Respons shall, engage in dialogue with the company to remedy risk. If dialogue shows that it is difficult to remedy risk, Data Respons shall consider terminating the partnership.

If actual adverse impacts on basic human rights or decent working conditions are discovered, the board will be informed. In such a case, the board shall consider restorative or compensatory measures.

## Corruption risks

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 guidelines on anti-corruption in Norway and applies it to all daughter companies and works actively to combat corruption and unethical practices.

We have used the Global Corruption Index (GCI) to conduct initial risk mappings as part of our compliance efforts to efficiently assess third-party risk exposure. On a Scale from 0 (very low risk) to 100 (very high risk) this is how our supply chain and business-partners score.

Norway	7.12	(very low risk)
Sweden	7.14	(very low risk)
Denmark	10.98	(very low risk)
Netherlands	13.74	(very low risk)
Germany	16.56	(very low risk)
USA	25.32	(low risk)
Taiwan	32.58	(low risk)
China	50.25	(medium risk)

Our overall assessment of China is that it is a medium to high-risk country. There is a high risk of breaches of both Human Rights and Labour Rights. In terms of Labour Rights, there is no freedom of association as China has not signed the ILO-conventions. There is also a high risk of corruption in China. Chinas territorial dispute with Taiwan, has made tension in the region rise.

Data Respons Solutions is a provider of high-end, customized technology solutions, and actively involved in the global technology ecosystem. The solutions that Data Respons develops could potentially be impacted by supply-chain disruptions in the future, due to the cutting-edge technologies used, and their origin of production (primarily Taiwan and China).

Key component producers (TSMC, Intel, TI, Samsung, etc.) are currently developing projects or building new production facilities in USA, Europe, Middle-East and India. Furthermore, governments in USA and Europe have put in place incentives to support developments.

To secure resiliency of our production and delivery supply-chain and to further reduce risk, we will

actively work with our suppliers, to source components from production sites in multiple continents.

## Assessment of business partners

Business partners in the form of hired consultants are used in situations where we need expertise that we don't currently have or where we don't have the capacity to cover the demand inhouse.

Using hired consultants provides us with flexibility and reduces risk. Our business partners are mainly sourced within the group and in the Nordics so there is a low risk of breaching Human Rights and Labour Rights violations.

## Assessment of own operation

Our employees are highly skilled and educated and does not work in what we consider risk exposed environments. Our work is predominantly project management, software coding or limited hardware testing/assembly. Our assessment is that Data Respons does not operate in any high-risk areas and there is a low risk of breaching Human Rights and Labour Rights violations in our own organisation.

Data Respons' business is heavily dependent on its 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.

Our guidelines are communicated throughout the organisation through employee and management training programmes, as well as in the company's onboarding program for new employees.

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.

## Reporting censurable conditions

Data Respons should be a safe and open workplace for everyone and has an independent third-party whistleblower channel, where suspected or alleged censurable conditions can be anonymously reported.

This may include breaches of HSE rules, harassment, fraud, bribes kickbacks, money laundering or other violations of ethical guidelines.

### 3. CEASE, PREVENT OR MITIGATE ADVERSE IMPACTS

Guidelines and obligations between Data Respons' suppliers and business partners are important preventive measures to actively cease, prevent or mitigate adverse impact.

We conduct risk assessments when we renew agreements with existing suppliers and when we review agreements with new suppliers.

#### **Mitigate adverse impacts:**

Our assessment is that we can influence through dialogue and well-founded measures based on the outcome of this dialogue. In cases where our risk assessment reveals missing documentation, guidelines or a lacking awareness about Labour Rights or Human Rights, we will contact our supplier or business partner to initiate dialogue.

#### **Great influence:**

With great influence possibility of impact on an actor we mean there ourselves can introduce improvement measures, as in our own business and how we treat our employees, as well as in cases where we can add pressure on a

supplier that we are going to switch to another supplier if not necessary improvement measures are implemented. Ultimately, we can switch to another supplier that fulfils the requirements we set.

#### **Medium influence:**

In cases where we have partnership agreements and dialogue with local representatives we can contribute to increased awareness and focus, while we continuously monitoring the market for better alternatives.

#### **Little influence:**

Issues where we consider that we have little influence but will continuously monitor the market for better alternatives and try to influence through our customers, the industry and interest organisations that we are part of.

### 4. TRACK IMPLEMENTATION AND RESULTS

Data Respons recognise that more work is needed to ensure that initiatives are systematically tracked and monitored. We are actively working to improve the company's approach to reviewing, following up on, and auditing human rights practices.

### 5. COMMUNICATE HOW NEGATIVE IMPACTS ARE ADRESSED

Data Respons regularly communicates our sustainability efforts on our web page <https://datarespons.com/about/esg/>

We continuously communicate with relevant stakeholders, suppliers, business partners & customers on relevant topics. Employees are continuously informed about performance and risks in the value chain.

This report is part of our effort to openly and transparently communicate our due diligence work. This report will be made publicly available to all interested parties at our website <https://datarespons.com/>

## 6. PROVIDE FOR OR COOPERATE IN REMEDIATION WHEN APPROPRIATE

Data Respons will make every effort to ensure that potential negative impacts are avoided.

Should due diligence assessments uncover suppliers or business partners with high risk of adverse impacts on basic human rights and decent working conditions, Data Respons shall, engage in dialogue with the company to remedy risk. If dialogue shows that it is difficult to remedy risk, Data Respons shall consider terminating the partnership.

If actual adverse impacts on basic human rights or decent working conditions are discovered, the board will be informed. In such a case, the board should consider restorative or compensatory measures.

### OBLIGATION TO PROVIDE INFORMATION

The obligation to provide information was applicable from when the law entered into force.

If you have questions about our work relating to the Transparency Act in Data Respons, we ask that this be sent in writing to:


[transparency-act@datarespons.com](mailto:transparency-act@datarespons.com)

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, our suppliers, and business partners

Oslo, 28. June 2023  
**BOARD OF DIRECTORS**



**Kenneth Ragnvaldsen**  
*Chairman of the Board*



**Rune Wahl**  
*Member of the Board*



**Veronique Pasquale Rodoni**  
*Member of the Board*



**Adriaan Cornelis Van Der Toorn**  
*Member of the Board*



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