



Report Transparency Act

28 June 2024

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1 Spir Group Transparency Act 2023

1.1 Introduction

Spir Group ASA ("Spir Group" or "the company") shall each year conduct due diligence assessments in accordance with the Norwegian Transparency Act and publish a report on these assessments.

The purpose of the Transparency Act is to promote respect for fundamental human rights and decent working conditions.

This report covers Spir Group's obligation to report on the due diligence assessments conducted by the company during the spring of 2024. It also describes the measures that have been considered and implemented to reduce the risk of negative impacts that the company's activities and business relationships may have on fundamental human rights and decent working conditions.

1.2 Contact information

Inquiries about this report can be directed to:

Anny Margrethe Bratterud

HR Director

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1.3 Reporting obligations

Spir Group's HQ is located at Dronning Mauds gate 10, Oslo, Norway.

Listed Norwegian companies or companies that meet two of the following three criteria: revenues over NOK 70 million, assets of more than NOK 35 million, and more than 50 employees, are required to report under the Transparency Act. Spir Group meets all these conditions and is therefore subject to the reporting requirements.

2 About the company

2.1 Company organization and area of operation

Spir Group is a Nordic software company. By collecting and making information available between consumers, the public sector, and the private sector, the company simplifies unnecessarily complex processes.

The company's customers include entities within the public sector and private businesses in real estate, property development, banking, and power companies, to name a few.

At the end of 2023, Spir Group had 354 full-time equivalents and operates in Norway and Sweden.

2.2 Internal guidelines

Spir Group has procedures for how we anchor the work with human rights and decent working conditions. Our ethical guidelines, code of conduct, and procurement procedures are available on our website: <https://spirgroup.com/act-relating-to-enterprises-transparency-and-work-on-fundamental-human-rights-and-decent-working-conditions>.

The procedures include the company's efforts to meet the requirements set forth in the Transparency Act.

Spir Group's procedures are approved by the company's board of directors and have been communicated to the company's employees. The procedures describe how the company conducts its due diligence assessment and evaluation of measures.

The procedures also include information about the company's whistleblowing channels, which aim to uncover negative impacts on fundamental human rights and decent working conditions related to the company's activities, as well as how such information is followed up.

2.3 Goals and progress

2.3.1 Overview of goals and progress

Spir Group works to reduce the risk of human rights violations and uphold decent working conditions, both within our own company, across our supply chain, and among our business partners.

We continuously assess risks associated with our company's activities and our business partners. At the same time, Spir Group continuously implements measures to achieve the goals set by the company. For a detailed description of the work carried out in the reporting year, please refer to sections 3 and 4 of the report.

2.3.2 Goals for the coming year

We have set several specific goals for the future.

| Goal | Status |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| We will further develop the due diligence assessment based on the experiences we gain. | In progress. |
| We aim to improve the competence within our organization regarding sustainability and responsible procurement practices. This will be done by improving supplier onboarding and consistently obtaining signed supplier declarations. | <p>In progress. We have been diligently working to elevate sustainability competence within the company, and employees can take online courses on the subject. Furthermore, several employees in various roles have taken courses at Norwegian Business School BI that offer credits and exams in sustainability. Our guidelines for suppliers are still being enforced.</p> <p>Spir Group is currently engaged in an ESG project with assistance from Deloitte to report in accordance with the EU's CSRD regulations for listed companies by 2025. As part of this project, a carbon footprint is being developed for the group. The dual materiality analysis that is currently underway will provide us with greater insights into risks and opportunities across the entire value chain. This includes mapping upstream and downstream activities and stakeholders</p> |
| We will update the guidelines for our work with the Transparency Act based on the experiences we gain. | In progress. |
| We will make sure that our subsidiaries who are, or will be, subject to report on the Transparency Act, will use our templates and methodologies. | In progress. |

3 Due diligence assessment

3.1 Overview of the company’s focus for due diligence assessment - methodology

Spir Group oversees and assesses the risk of violations of fundamental human rights and decent working conditions related to the company’s activities and business relationships. The responsibility for this lies with the HR department.

To comply with the legislation, a project group has been established, led by the company’s HR director. The group has conducted a due diligence assessment and mapped out who we do business with, what we are trading, and the processes followed by our business partners. The due diligence assessment has identified which suppliers we need to look further into and follow up on. At the same time, we have identified which activities should be prioritized if issues arise that are not compatible with ethical trade. The due diligence assessment has been conducted in accordance with the OECD Guidelines for Responsible Business Conduct. The project group has been continuously working on due diligence assessments since the Transparency Act was introduced in July 2022.

The company has followed the six steps of the due diligence process (Figure 1) and our guidelines for our work with the Transparency Act.

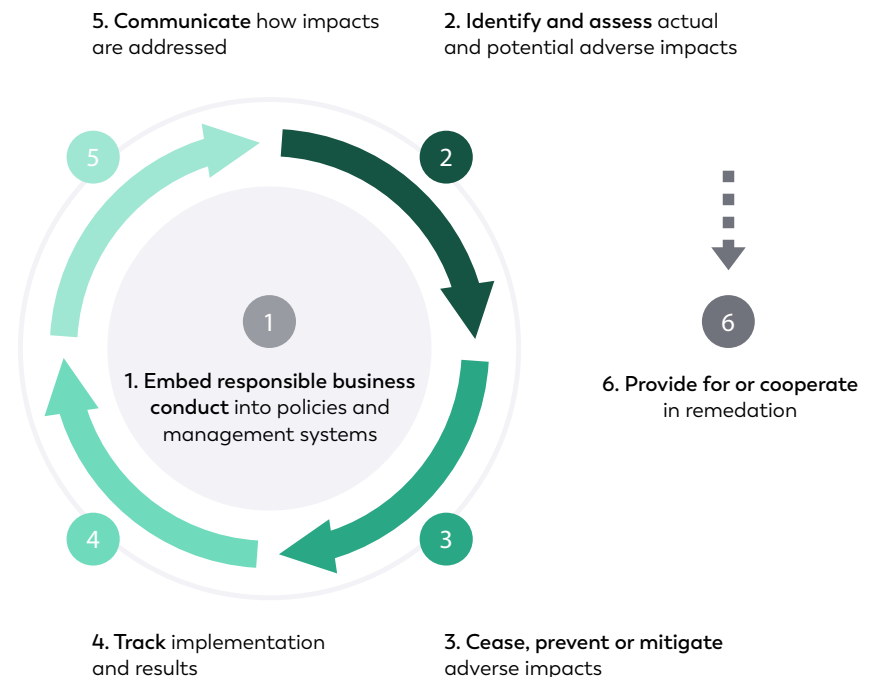


Figure 1: The six steps in the due dillingence process

Description of activities and findings for each step in the due diligence process

| Step | Activities and findings |
|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 Embed responsible business conduct into policies and management systems | <ul style="list-style-type: none"> Form a project group and decide in the management team where the responsibility for the Transparency Act belongs within the organization. Embed and decide on the process in management meetings and the company's board of directors. Review of relevant internal and external documents and systems according to corporate governance procedures. Documents that are fully or partially updated Several of the same documents are regularly updated in accordance with ISO guidelines (supplier policy, procurement procedures, and ethical guidelines). |
| 2 Identify and assess adverse impacts | <ul style="list-style-type: none"> With more than 500 suppliers, conducting supplier risk assessments is challenging. We used the following principle to identify and assess a selection of high-risk suppliers: <ul style="list-style-type: none"> Size: Large companies where we have substantial influence. Geography: Apart from Norwegian suppliers, the company only has 10 foreign suppliers. We chose to include all non-Norwegian suppliers in further investigations. Industry: We chose to focus our mapping on our suppliers within banking, insurance, software houses, advertising, information systems, and equipment suppliers. Goods: The company has not assessed specific goods with varying risks but plans to do so in the next due diligence assessment. The business managers then reviewed our supplier portfolio and identified suppliers with a high risk of human rights violations and decent working conditions breaches. Based on this, we sent out customized questionnaires to gather additional information. These were sent to 142 different suppliers. We worked systematically to collect responses and achieved a response rate lower than in the previous survey. To follow up, the customer service center will contact those who have not responded. The ongoing materiality analysis will also provide insight into the various suppliers in the value chain so that this data can be compiled. |
| 3 Cease, prevent or mitigate | <ul style="list-style-type: none"> Based on the responses from the questionnaire, we categorized suppliers into groups for tailored follow-up. Based on our investigations, we have no grounds to assert or suspect violations of human rights or decent working conditions. |
| 4 Track implementation and results | <p>Our plan for further monitoring is as follows:</p> <ul style="list-style-type: none"> Supplier risk is considered a separate risk in the overall risk management efforts of the company. Further develop the company's procurement system for categorizing suppliers to more easily identify and assess risks. Supplier management and ensuring that more suppliers sign supplier declarations. |
| 5 Communicate how impacts are addressed | <p>Spir Group actively uses this mapping to strengthen its work with the Transparency Act. The disclosure is easily accessible on our website: https://spirgroup.com/corporate-governance</p> |
| 6 Provide for or cooperate in remediation when appropriate | <p>The final step in the due diligence assessment is not relevant in this year's disclosure because we have not uncovered significant findings that require further action.</p> |

3.2 Due diligence assessments of the company's products and services

Our largest suppliers provide goods and services in banking, insurance, software houses, advertising, information systems, and data equipment, and we have chosen to conduct due diligence assessments on them. Additionally, the company makes extensive use of consulting services, which we have also subjected to due diligence assessments.

Scope: Spir Group practices a risk-based approach based on the proportionality principle in the Transparency Act. The processes and routines in our work with the Transparency Act are related to the company's business operations, supply chains, and business partners. Our own operations have been assessed as low risk, justified by robust internal processes and a high degree of compliance with established Norwegian legislation.

Limitations: Spir Group does not conduct due diligence assessments in all our partially owned companies but influences them through procedures for corporate governance and supplier follow-up. We have few business partners who deliver goods or services directly to the company, and these are not assessed. Our business partners are primarily Norwegian, and we consider them to be low-risk actors concerning the risk of violations of fundamental human rights and decent working conditions.

3.3 Results of the due diligence assessment

Spir Group has not uncovered any violations of human rights or decent working conditions for the reporting year 2023. The company has also not identified any significant risk of violations or negative consequences. Spir Group finds that maintaining good dialogue with suppliers is an important outcome of the work with the Transparency Act. Our suppliers predominantly comply with laws and regulations.

4 Restoration and compensation

Spir Group has not uncovered any cases requiring restoration in the reporting year.

Oslo,
28.06.2024

Sign.

Per Haakon Lomsdalen
CEO

Sign.

Rolv Erik Ryssdal
Chair

Sign.

Sigrun Syverud
Board member

Sign.

Preben Rasch-Olsen
Board member

Sign.

Jens Rugseth
Board member

Sign.

Monica Beate Tvedt
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