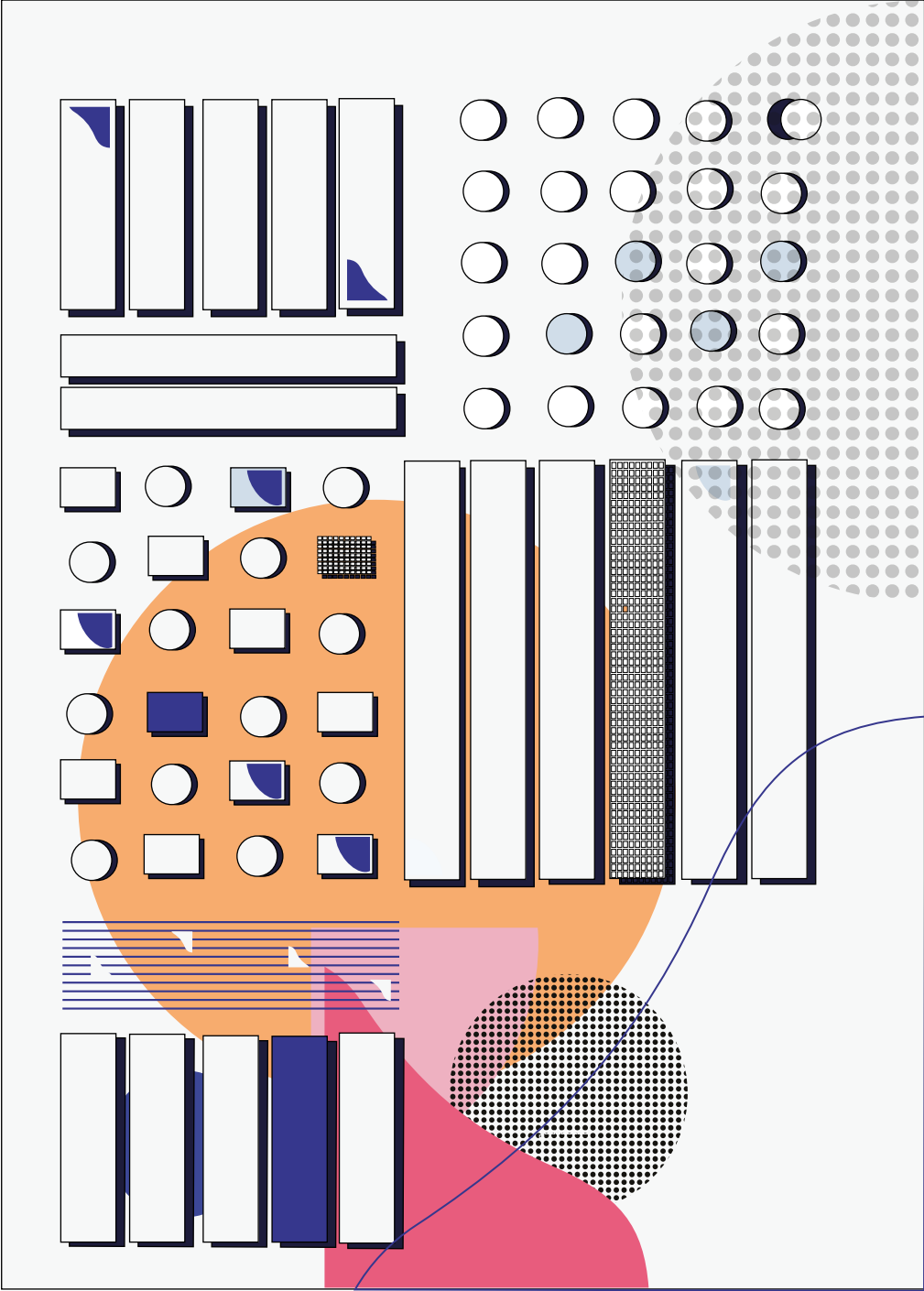


TRANSPARENCY ACT REPORT



bouvet

2024

WE LEAD THE WAY AND BUILD
TOMORROW'S SOCIETY

1. The Group's report pursuant to the transparency act for 2024

1.1. Introduction

The Norwegian Transparency Act requires Bouvet to conduct annual due diligence assessments and to publish a report on these.

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

This report fulfils the group's obligation to provide an account of due diligence assessments conducted in the period 1 January 2024–date. In the report, the group also provides an account of the measures that have been considered and implemented to reduce the risk of adverse impacts on fundamental human rights and decent working conditions from the group's activities.

1.2. Contact details

Enquiries regarding this report can be addressed to:

Bouvet ASA
Chief Compliance Officer (CCO), Trude Hole
Email: trude.hole@bouvet.no

1.3. Reporting obligation

Bouvet ASA's head office is located at Sørkedalsveien 8, Oslo, and the group is domiciled in Norway. Since Bouvet ASA has listed securities¹, it is subject to a reporting requirement².

The report covers the group's subsidiaries Bouvet Norway AS, Olavstoppen AS, Sesam.io AS and Bouvet AB.

Bouvet ASA is listed on the Oslo Stock Exchange.

2. About the Group's operations

2.1. The group's structure and areas of operation

Bouvet is a leading Scandinavian provider of IT and digital communication services, and acts as a digitalisation partner for a number of its clients.

The group serves the Norwegian and Swedish markets. It operates in both the public and private sectors and is active in such fields as oil, gas and renewables, public administration and defence, energy supply and service provision. Bouvet is organised into seven regions comprising 14 offices in Norway and two in Sweden. The group's regional model avoids bureaucracy, shortens decision paths and facilitates regional adaptation of organisational structures and services, including through the operation of dedicated regional offices.

Bouvet had 2 360 employees as at 31 December 2024. The group's operations cover a broad range of services in the areas of IT, design, communication and corporate governance. Bouvet's ambitions and values support the autonomy of the various regional operations while also forming a basis for collaborative development.

When clients require expertise and solutions not offered by Bouvet, the group involves partners. It is Bouvet's strategy to utilise its own employees to deliver services. However, when capacity is lacking, sub-consultants are used to the extent that such temporary hires are permitted by applicable regulations.

In addition to its main business within advisory services, the group owns the subsidiary Sesam.io AS, which develops, manages and sells the SaaS products Sesam Talk and Sesam Hub. Sesam.io AS was merged with Bouvet Norge AS with effect from 1 January 2025.

2.2. Internal guidelines

The group's procedures for communicating and monitoring its measures related to human rights and decent working conditions – i.e. due diligence assessments of suppliers, sub-suppliers and business partners – are incorporated into the group's management system, which is managed and implemented by Bouvet Norway AS. The procedures also cover the other subsidiaries' work to fulfil the requirements of the Transparency Act.

Bouvet works continuously on improving its procedures, which are published on the company's intranet, Min Side, and on bouvet.no.

The procedures set out how the group conducts its due diligence and assesses the measures it implements. The group's internal guidelines cover how whistleblowing reports must be processed. Whistleblowing helps identify any adverse impacts on fundamental human rights and decent working conditions associated with the group's operations.

The administrative organisation keeps itself updated on relevant legislation in accordance with the Transparency Act.

Suppliers are assessed centrally, at group level, and – in the case of local suppliers – in the individual regions. Bouvet's quality managers work together in the group's regional quality manager network to ensure that local suppliers and their sub-suppliers are subjected to due diligence checks and are followed up on in accordance with the group's procedures.

The group is committed to continuous training of selected employees in the regions.

¹ Defined in section 1-5 of the Norwegian Accounting Act.

² See sections 2 and 3 of the Norwegian Transparency Act.

2.3. Objectives and progress

2.3.1. General comments on objectives and progress

Bouvet works consistently to assess whether there are any risks associated with the group’s operations and business relationships (suppliers and business partners³). In addition, measures to ensure achievement of the objectives are implemented on an ongoing basis. See sections 3 and 4 of this report for more information on the work done so far.

2.3.2. Objectives for future years

Bouvet has adopted a number of specific objectives.

Objective	Status
Enhance internal expertise on sustainability and responsible procurement practice, including due diligence.	In progress
Always require signed acceptance of compliance with Bouvet’s Supplier Code of Conduct when entering into contracts with suppliers.	In progress
Establish system support for carrying out supplier evaluations in accordance with the Transparency Act.	Initiated

2.3.3. Measures implemented in 2024

- Sent out questionnaires to selected suppliers, but the response rate was low and the work therefore of little value. The group will therefore consider an alternative approach to such investigative work.
- Revised criteria governing the prioritisation of suppliers for the collection of necessary information.
- Revised the group’s purchasing guide and its assessment criteria.
- Revised Bouvet’s ethical guidelines for suppliers.
- Revised the group’s ethical guidelines (Code of Conduct).
- Revised Bouvet’s procedures and management system based on gained experience of conducting due diligence assessments.
- Completed a procurement process for a new supplier contract system.

³ “Suppliers” and “business partners” are defined in section 3(1)(d) and (e) of the Transparency Act. “Business relationships” is used as collective term for suppliers and business partners.

3. The due diligence process

3.1. General comments on Bouvet’s due diligence focus

Bouvet continuously assesses the risk⁴ that the group’s operations or business relationships may have an adverse impact on fundamental human rights and/ or decent working conditions. The group continuously evaluates whether its activities entail such impacts.

The group’s general approach to due diligence assessments is as follows:

1. Embed responsibility in group policies.
2. Identify and assess any actual or potential adverse impacts on fundamental human rights or decent working conditions which the group has either caused or contributed to, or which are directly linked to the group’s business operations, products or services via its supply chains or business partners.
3. Implement suitable measures to stop, prevent or mitigate adverse impacts based on the group’s prioritisation and assessments in accordance with item 2.
4. Monitor the implementation and results of measures taken in accordance with item 3.
5. Communicate with affected stakeholders and rightsholders regarding how adverse impacts are addressed in accordance with items 3 and 4.
6. Arrange or cooperate on remediation and compensation where required.

Relevant due diligence factors related to the group’s operations and business relationships include:

- he group’s operational context
- he group’s business model(s)
- he position in the supply chain
- ype of product or service

⁴ “Risk” refers to the likelihood of adverse impacts on human rights and decent working conditions, and the severity of the adverse impacts for those affected.

⁵ “Supply chain” means all parties in the chain of suppliers and sub-suppliers which supply or produce goods, services or other input factors incorporated into an enterprise’s delivery of services or production of goods from the raw material stage to a finished product; see section 3(d) of the Transparency Act.

⁶ “Business partner” means any party which supplies goods and services directly to the enterprise, but which is not part of the supply chain, see section 3(e) of the Transparency Act. Examples of business partners include the company’s cleaning partner, the operator of the company’s IT platform, the company’s external accountant, etc. .

Below, Bouvet will provide an account of material risks concerning adverse impacts on fundamental human rights and decent working conditions identified through the group’s due diligence assessments. The report also covers any identified violations of fundamental human rights and decent working conditions.

3.2. Bouvet’s supply chain⁵ and business partners

As at 31 December 2024, the group had commercial relationships with more than 1 875 suppliers. Bouvet has conducted supplier evaluations for all direct suppliers from which it has purchased goods and services for more than NOK 2 million per year. Evaluations have not been conducted for sole proprietorships and sub-consultants no more than three employees, as Bouvet considers these types of suppliers to be at low risk of violating rights.

The supplier evaluations resulted in follow-up of 70 direct suppliers located in the following countries/ geographical regions⁶:

Country/geographical region	Number of suppliers
Norway	63
EU	5
USA	0
UK	2

The following known sub-suppliers were used:

Country/geographical region	Number of sub-suppliers
Norway	25
EU	2
UK	1

The group had commercial relationships with 44 business partners in the reporting year. The group's business partners were located in the following countries/geographical regions:⁷

Country/geographical region	Number of business partners
Norway	40
EU	3
USA	0
UK	1

3.3. Due diligence assessment of Bouvet's products and services

Bouvet develops, produces and delivers services and administers the SaaS product Sesam Hub.

3.3.1. System development; platform; insight and analysis; business systems; collaboration; advisory services; change management; project management; business and service design; communication

Bouvet provides a broad range of services in these areas. Such service deliveries comprise expertise-based work carried out on Bouvet's own or client premises in Norway and Sweden. The risk of violations of human rights and decent working conditions is low in the group's own operations, in its value chain and among its partners; see Bouvet's gender equality statement, which addresses the activity and reporting obligation of employers for 2024 as published on eng.bouvet.no. It is considered that sub-suppliers used by the group to foster skills-building and capacity in connection with assignments present a low risk. These businesses are largely knowledge-intensive companies with highly qualified personnel operating in a well-organised and transparent Norwegian labour market.

3.3.2. Cloud platforms and innovation

Bouvet provides services related to cloud platform migration and administration, and uses cloud platforms to manage Sesam's SaaS product. Most such services and products rely on three major international cloud and platform suppliers.

Reports and articles from the last few years document that certain of these players do not adequately comply with requirements related to, in particular, pay and working conditions, freedom of association and employee monitoring.

Like many large companies, major platform suppliers are the subject of criticism and legal challenges related to working conditions and human rights. Bouvet's suppliers have stated that they maintained their efforts to ensure compliance with ILO conventions and improve working conditions in 2024. According to their published sustainability reports, all the suppliers have undertaken to respect internationally recognised human rights, including the ILO core conventions and the ILO Declaration on Fundamental Principles and Rights at Work. All of the group's suppliers claim to have made significant progress in several areas, including the working environment and fair working conditions.

As a provider of services on – and associated with – these platforms, Bouvet is concerned about violations of workers' fundamental, statutory rights. Available information suggests that these kinds of violations of workers' rights are less of a problem in the EU/EEA than in other regions. The vast majority of services used by the group are provided by suppliers located in Norway and Europe.

Bouvet encourages its clients to prepare better assessments of the suppliers they contract with, the services they use and which regions these contractors and services are from. The group has made such assessments an integral part of its supplier evaluations, and avoids using cloud services located outside Europe wherever possible.

In Bouvet's view, the most effective way to combat violations of this kind would be for Norwegian and EU authorities to establish clear requirements regarding human rights and decent working conditions which suppliers have to fulfil if they want to operate in relevant markets.

Unfortunately, the services of the major cloud providers are the only currently available option for the operation and management of cloud-based solutions. As the vast majority of digitalisation initiatives currently build on the use of cloud services – whether hybrid or public – the need for a national/EU-owned cloud platform which provides a corresponding range of services appears to be intensifying. We are closely monitoring initiatives launched by the Norwegian Agency for Public and Financial Management (Norwegian acronym DFØ) through the Marketplace for Cloud Services (Norwegian acronym MPS) to facilitate green, secure and efficient cloud services for the public sector. The timeframe for the initiative runs until 2027, meaning that it will have little impact on the current situation in the short term.

3.3.3. Artificial intelligence (AI)

In 2024, so-called generative AI has become the most widespread and exciting new technology on the market. Although AI implementation is still in its infancy, the opportunities and risks which generative AI represents with respect to society, working life and individuals are becoming clearer. There are clear indications of risks related to such topics as discrimination and bias, privacy and surveillance, automation and job security, lack of transparency, and security risks linked to insufficiently tested or implemented technology.

Many of the players who are leading efforts to make generative AI available are also leaders in cloud technology. Bouvet is actively positioning itself as a leading provider of advisory services related to generative AI and its use in the Norwegian market. The group will maintain a strong focus on the ethical aspects of using this new technology.

3.4. Results of the due diligence process

Bouvet takes the view that it is operating in an industry and at locations where the risk of violations in important areas such as data privacy, business conduct, HSE, human rights and working conditions is low. The group also considers that the sub-suppliers it uses in assignments represent a low risk.

The group is of the opinion that the risk of violations of human rights and working conditions is medium with respect to international suppliers of cloud services and platforms for applied generative AI.

Suppliers involved in the production of mobile telephones, laptops and computer screens present a high risk of such violations. The latter two categories are monitored in accordance with the group's procedures.

Main findings

Area	Service/product	Risk assessment	Level of influence
Suppliers			
Bouvet's services	Cloud platforms/AI	Medium risk	Low
Own operations	Hardware	High risk	Low
Partners			
	Consultancy firms, sale of technical expertise	Low risk	Medium
Own operations			
	Sale of own employees' technical expertise	Low risk	High

⁷ According to the preparatory works to the Transparency Act, the production site and specific business partners need not be named.

The due diligence process revealed the following findings which the group identified and prioritised in the reporting year:

Identified violations of human rights/ decent working conditions	Geographical region(s)	How are violations of human rights/ decent working conditions identified?
Workers' rights in connection with raw materials extraction, parts manufacturing and, to some extent, the assembly of mobile telephones, laptops and computer screens. Particularly in the form of low pay, compulsory overtime, misuse of students as labour, and dismissal of union leaders. Health and safety are a problem in electronics manufacturing, including the handling of a large number of hazardous chemicals, failure to use personal protective equipment and inadequate health and safety training. Workers are increasingly employed on repeated short-term contracts and thus exposed to job insecurity.	China and other countries in Asia.	The information has been obtained from international media, specialist websites, television and newspapers. Reports and news reports supplied by www.anskaffelser.no (such as the High Risk List maintained by the Norwegian Agency for Public and Financial Management, DFØ), www.swedewatch.org , www.wired.com and www.amnesty.no .
Child labour, working conditions, health and safety in connection with the extraction of minerals such as cobalt for the production of lithium-ion batteries for use in electronics.	Africa (DR Congo) and China.	www.amnesty.org

Product/service	Material risk of violations of human rights/decent working conditions	Country/geographical region(s)
Use of cloud platforms/ generative AI	Freedom of association, pay conditions, working hours, HSE and employee monitoring	USA, Saudi Arabia

4. Measures to stop, prevent or mitigate adverse impacts

Below, the group provides an overview of the measures it has implemented to prevent, mitigate or stop impacts and risks identified above.

Based on its investigations, Bouvet has implemented the following measures:

Identified violations/ risk of violations	Violations of workers' rights in connection with raw materials extraction, parts manufacturing and, to some extent, the assembly of mobile telephones, laptops and computer screens. Child labour, working conditions, health and safety in connection with the extraction of minerals such as cobalt for the production of lithium-ion batteries for use in electronics.
Implemented measures	Continuous focus on extending the service life of purchased hardware, raising awareness of the issue among employees, and improving system support for reusing and extending the service life of hardware.
Objective	Bouvet's ongoing commitment to sustainable procurement and renewal of all types of hardware is intended to reduce purchases of mobile telephones, PCs and computer screens.
Status	Ongoing initiative

Identified violations/ risk of violations	Violations of freedom of association, pay conditions, working hours, HSE and employee monitoring by international suppliers of cloud services/AI.
Implemented measures	Sustainability/ESG, including respect for fundamental human rights and decent working conditions, are included in the assessment criteria for the Go/No-go process forming part of the sales and tendering process in the group's quality system. Maintain partnerships and close cooperation with suppliers.
Objective	The objective is that both Bouvet's clients and the group itself will improve their assessments of which suppliers they can contract with and what services, and from which regions, can be used.
Status	Ongoing initiative

5. Monitoring of measures – implementation and results

5.1. Introduction

Bouvet works continuously to monitor the group's implementation of measures taken, and their results.

5.2. Monitoring procedures⁸

Bouvet ASA's CCO bears overall responsibility for monitoring implementation of adopted measures and achieved results. The group has the following procedures in place for monitoring implementation:

- Two assessments per year of suppliers, sub-suppliers and partners in the areas of safety, quality, sustainability, HSE, the environment, discrimination, compliance with sanctions, human rights and decent working conditions.
- Ongoing assessments of suppliers, sub-suppliers and partners in connection with changes to supplier composition, new assignments, renegotiation and renewal of contracts, reported incidents and non-conformances.
- Regular fact-finding for a prioritised selection of Bouvet's new sub-suppliers concerning their efforts to ensure that human rights are respected and that workers enjoy decent working conditions both in their own operations and among their sub-suppliers' sub-suppliers.
- Require suppliers to accept Bouvet's Code of Conduct prior to contracting.
- Ongoing monitoring of relevant sources of information, published reports on the IT sector (particularly concerning Bouvet's hardware and software suppliers), and industry surveys.

- Embedding these processes with management through periodic status reviews of management systems for information security, quality and the environment, including supplier evaluations. Reviews must be conducted at least once per year or when major changes necessitate a new review.
- As part of its continuous improvement efforts motivated by its ISO certifications (ISO 9001, ISO 14001 and ISO 27001), Bouvet monitors implementation and the effect of its internal commitments, activities and objectives for due diligence processes. The group regularly conducts internal and external reviews of achieved results. Bouvet communicates achieved results at relevant levels within the group.
- When conducting due diligence, Bouvet takes into account lessons the group has learned and feedback it has received. The purpose of doing so is to improve the process and future results.

Based on these measures, Bouvet has developed and keeps updated a progress plan for remediation efforts. This plan follows the structure outlined in section 3. With a view to ensuring that the implementation and results are monitored, the division of responsibility and organisation is included in the work that is covered by Bouvet's management system.

This ensures organisational backing and consistent enhancement of the group's efforts. In addition to being embedded with management and ensuring a clear allocation of responsibility, the chosen structure is intended to ensure that the roles responsible for such tasks on a daily basis have the necessary expertise and authority. This ensures that relevant group functions have the required capacity and expertise on human rights.

6. Communication with relevant stakeholders and rightsholders

The group has not identified any violations of human rights or decent working conditions. It has uncovered a risk of violations related to the manufacture of mobile telephones, laptops and computer screens, as well as among international cloud service providers.

7. Remediation and compensation

The group has not identified any cases requiring remediation.

Oslo, 9 April 2025
The board of directors

Document signed electronically

Pål Egil Rønn
Chair

Tove Raanes
Deputy chair

Sverre Hurum
Director

Lill Hege Hals
Director

Egil Christen Dahl
Director

Per Gunnar Tronsli
CEO

⁸ The Transparency Act does not require an account to be given of how an enterprise implements and carries out identified measures.

bouvet