

# NORWEGIAN TRANSPARENCY ACT

Report for 2023

## Introduction

With the Norwegian government's implementation of the Transparency Act on July 1st 2022, Norwegian organizations are required to prepare a due diligence assessment every year. This report is updated and published no later than June 30th each year.

In this report, Witted Megacorp AS (hereinafter referred to also as "Witted" and as "Company") will present how Witted in Norway works to promote respect for fundamental human rights and decent working conditions both internally in its own business and through cooperation with suppliers and business partners. This report contains a general description of Witted's organizational structure, business area, guidelines and procedures for handling actual and potential negative consequences for fundamental human rights and decent working conditions. Furthermore, this report also contains information on actual adverse impacts and risks of adverse impacts that Witted has identified through conducting a due diligence assessment.

The report also includes information on measures that Witted has taken or plans to take to stop actual negative impacts or significantly reduce the risk of negative impacts, and the results or expected results of these measures.

## General description of the Company's organization and operating area

Witted Megacorp is a Nordic IT consulting group company that specializes in building and developing businesses' digital development capabilities. The group operates in Finland, Norway, Sweden, Denmark and the USA. The group's parent company Witted Megacorp PLC is listed on the NASDAQ First North Growth Market in Finland. The ability to develop and build software is all about people. The group has built a network of over 3,500 IT Professionals.

The Norwegian subsidiary company Witted Megacorp AS was established in Norway in 2019, and today has a turnover of approx. NOK 118,000,000 in Norway, and has 18 employees. Witted is a one-stop-shop for IT expertise and solves both consulting and recruitment needs of customer organizations. Witted supplies senior consultants for all types of digital development projects and finds solutions no matter what the customers' digital business challenges may be.

## Measures to comply with fundamental human rights and employees' rights

The Company has established clear and distinct guidelines that set the standard for respect for fundamental human rights and decent working conditions within the organization. This includes principles such as non-discrimination, working hours, health and safety in the workplace.

### Detailed description of how Witted complies with this:

Witted has prepared its own Personnel handbook (hereinafter referred to as the "Handbook"). This is available to all employees at all times. The Handbook is divided into several chapters that cover different topics and information about different parts of the business. The Handbook provides all the necessary information to the employees in one and the same place, while also being a document that is used to set guidelines, and describe how the employee and the employer must observe a decent working relationship at Witted.

Below, we highlight the most important points/areas described in the Handbook in terms of fundamental human rights and employee rights:

The Handbook provides information on which rules govern the relationship between the employee and the employer and what is required of all employees in order to respect colleagues and, not least, to treat each other well. Furthermore, the Company ensures that as an employee of Witted, the employee has the right to personnel follow-up, equal treatment and that the employee has access to sufficient information.

### In the Handbook, Witted has also set the following guidelines/policies to be followed internally:

- Witted is a safe workplace with satisfactory pay conditions
- Witted offers challenging and developing tasks for all its employees
- Prevent work-related sickness absence

To manage the above described guidelines and policies, the employees and the employer shall cooperate constructively.

Under no circumstances will it be accepted in the Company that someone speaks offensively or openly criticizes their colleagues. Neither co-workers nor customers should criticize each other, or place blame on others for things not going as planned. All matters that one believes to be wrong or objectionable must be taken up in a pleasant manner directly with the person concerned or alternatively with a superior. Clear guidelines have also been set on how to notify in situations where one experiences objectionable conditions in the workplace. The Handbook also provides information on working hours, lunch/break time, flexible working hours, holidays and the possibility of a home office. The Company is also consistent in informing the employees about the right people to contact regarding specific situations in order for this to be easy and convenient for the employees.

Witted is directly covered by the Transparency Act and thus, has carried out a due diligence assessment of its own business and suppliers in accordance with the Transparency Act. The due diligence must be done regularly, and the report will be updated by 30th of June each year. Conducting the said measures will strengthen the Company's control over whether the business itself, as well as the suppliers, comply with fundamental human rights and employees rights. The said measures also point out where, if necessary, actions should be initiated. The Company has appointed a person responsible internally to follow up and conduct the report.

### Training/Onboarding

As a part of the onboarding process in the Company, the Company's guidelines and the Personnel Handbook will be introduced to the employee. New employees will be informed of this report to ensure they are familiar with it.

## **Information on actual negative consequences and significant risk of negative consequences and result of due diligence assessment**

Witted's supply chains mainly consist of organizations in Norway and the EU, as the Company does not normally operate outside these countries. Most of the Company's suppliers are well known to the Company through established partnerships over a long period of time, and Witted is keen to get to know the new suppliers entering the network. Witted aims to avoid entering into contracts with suppliers or subcontractors located in geographical areas involving a greater risk for fundamental human rights and decent working conditions not being safeguarded. However, Witted recognizes that upstream supply chains may include countries with a higher risk of weakened protection of human rights and sound working conditions.

To counteract this, Witted has implemented processes to ensure that suppliers pass forward set commitments in their supply chain. Witted has carried out a due diligence assessment of both its own Company and its suppliers. As a result of the said measures, Witted found there being no or low risk both in the company itself and with the Company's suppliers in regards to complying with fundamental human rights and employees' rights.

The assessment will be made regularly, and if the risk changes, the change in our evaluation will be reported and actions will be initiated. See more information about this under "Due diligence assessment and Witted's suppliers".

### **Due diligence assessment and Witted's suppliers**

Since Witted was founded in 2019, the Company has improved and developed the Company's contracts both with suppliers and partners. Witted also has very close dialogue and cooperation with its closest suppliers and partners, so that Witted becomes well acquainted with their guidelines, requirements, environment, etc applicable. It is important to Witted that our subcontractors focus on employees and fundamental human rights, and Witted cooperates only with serious players in the market.

If Witted's suppliers do not meet the requirements of the Transparency Act, Witted will have to initiate actions. The actions will be assessed based on the type of supplier concerned, the extent of the risk/infringement, and the type of risk/infringement in question. In such a situation, Witted will engage in dialogue with the supplier and investigate which actions are necessary in order to continue the collaboration. Witted will also create a follow-up plan, so that it is easier to follow the supplier's improvements. In the follow-up plan, Witted will also include an ongoing evaluation of the process and possibly whether there are more actions that need to be initiated. Witted will set deadlines for implementation and follow-up. If the supplier does not comply with the follow-up plan and does not show cooperation, Witted will have to reconsider the cooperation.

As previously mentioned, we recognize that upstream supply chains may come from countries with a higher risk of weakened protection of human rights and sound working conditions. After a thorough assessment of our subcontractors, we have concluded that none of them have significant risks of negative consequences for basic human rights and decent working conditions.

If this assessment changes, the report will also be updated.

### **Responsibility**

The managing director takes responsibility for ensuring that this statement complies with Witted's ethical and legal obligations. It is the board's responsibility to ensure that the standards are maintained in their own operational and professional areas and that appropriate measures are taken to deal with any concerns or breaches of this statement. This statement is revised annually to confirm that fundamental human rights and decent working conditions are not violated in our internal operations or in our supply chains.

Oslo June 14th, 2024

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Erlend Rosseland Stokke, CEO

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Teemu Tiikainen, Board member

# Deltakere

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## *Signert med E-signere*

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## *Signert med E-signere*

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