

A background image showing four people in a meeting. A woman with glasses stands and points at a document on a table. Two other people are seated at the table, looking at the document. A fourth person is partially visible on the right. There are three white mugs on the table, two of which have the 'ecit' logo. The entire image has a dark blue overlay.

ecit

**ECIT due diligence under the
Norwegian Transparency Act 2022**

ECIT due diligence under the Transparency Act

The purpose of the Transparency Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This legislation aligns with Norway's commitment to achieving the United Nations' Sustainable Development Goals, particularly Goal 8 on promoting decent work and economic growth, as well as Goal 12 on responsible production and consumption. The primary objective of the Transparency Act is to encourage sustainable business practices and ensure that businesses proactively address any negative consequences associated with human rights and working conditions.

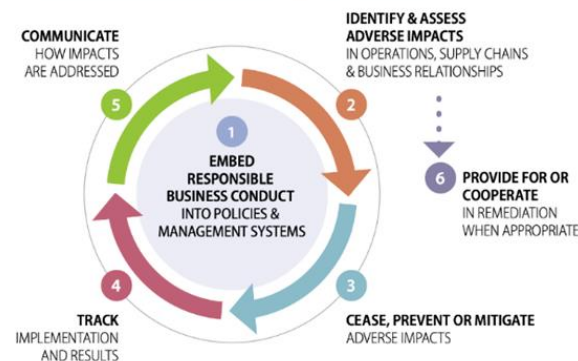
As a result, the Act grants the general public the right to access information about how businesses handle these consequences. ECIT, along with the subsidiaries covered by the Transparency Act, acknowledges and takes the obligation to comply with the Act's requirements seriously.

To fulfil these obligations, ECIT has undertaken a due diligence process in line with the five-step OECD Guidelines for Multinational Enterprises. This process aims

to identify and assess potential adverse impacts and risks related to human rights and working conditions.

Subsequently, ECIT has formulated guidelines to cease actual adverse impacts or mitigate risks of adverse impacts.

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



Source: Figure 1: OECD (2018) OECD Due Diligence Guidelines for Responsible Business Conduct

ECIT has established a strong presence in Norway and is expanding its global reach with operations in 10 different countries. With 2300 employees and 100 offices, ECIT is a

prominent player in the market. The company's unique one-stop-shop concept allows us to offer a comprehensive range of services in key business areas, including IT, Finance & Accounting, and Tech, within various sectors and industries. Services delivered are among other: Finance & accounting, cloud services and security solutions, advisory, business administration software, high-end managerial advice, and digital transformation including automation and robotics. Through knowledge-based services, we assist our customers in realizing their business potential. By leveraging our knowledge-based services, ECIT assists customers in achieving their business potential.

To ensure responsible business practices, ECIT has implemented guidelines and procedures for reporting and addressing both actual and potential adverse impacts on human rights and working conditions. These guidelines include annual due diligence processes that mitigate potential risks and safeguard the well-being of our employees and the value chain of our direct suppliers.

We acknowledge that the potential risks may vary across our divisions, namely IT, Tech, and Finance & Accounting. In 2022, ECIT established both a Code of Conduct and a Supplier Code of Conduct which covers various areas such as human rights, gender equality, supplier relationships,

labour standards, and environmental responsibility. In addition, our Norwegian subsidiaries, which fall under the Transparency Act, undergo the due diligence process outlined by the OECD, in addition to committing to our Code of Conduct and Supplier Code of Conduct.

It is important to note that a majority of ECIT's suppliers are based in Norway, making them subject to the stringent regulations stipulated by Norwegian legislation. Consequently, we anticipate that the risk associated with adverse impacts or risks of such impacts will be minimized through our commitment to compliance and responsible business practices.

The Transparency Act aligns with §1-7 of the Norwegian Accounting Act, pertaining to the financial year. The Act entered into force July 1, 2022 and includes actions and initiatives carried out until December 31, 2022. ECIT has not identified any actual adverse impacts or significant risks of adverse impacts through the due diligence process.

We are committed to addressing any actual adverse impacts or significant risks of adverse impacts by implementing appropriate measures. These measures include closely monitoring and auditing our subsidiaries, as mandated by the Transparency Act, and fostering clear communication between ECIT Group and subsidiary representatives. The board of directors of each subsidiary, subject to the Transparency Act, actively supports these efforts.

To further mitigate risks related to human rights and working conditions, we have implemented several initiatives. These include the development of a Code of Conduct for our organization and a Supplier Code of Conduct. Additionally, we have established a whistleblowing system for reporting any potential violations, and a webpage regarding "Transparency Act" with contact information for potential inquiries i.e. apenhetsloven@ecit.no. Following our guidelines, we proactively identify and address any potential risks or adverse impacts, ensuring a sustainable and ethical direct supply chain.

We maintain a strong focus on risk mitigation and are confident in our ability to uphold responsible business practices. Our guidelines are intended to safeguard human rights and working conditions across our operations and direct supply chain.

