

# TRANSPARENCY ACT

## REPORT 2023



## Introduction

The Norwegian Transparency entered into force 1 July 2023. The Act shall promote companies' respect for basic human rights and decent working conditions and ensure the public's access to information. The law gives everyone the right to demand information about how Asolvi complies with the Transparency Act, as well as how the Company handles any negative impacts on fundamental human rights and decent working conditions. Such enquiries can be posted through a link on Asolvi's website, [www.asolvi.com/sustainability](http://www.asolvi.com/sustainability).

Furthermore, Asolvi is required to conduct annual human rights due diligence pursuant to the Norwegian Transparency Act and to publish a report on these assessments. This is Asolvi's Transparency Act report for 2023.

## About Asolvi

Asolvi is a global provider of industry specific field service management software. The Company offers software as a service solution to more than 1800 businesses across the globe. Our headquarters are located in Trondheim, Norway, with subsidiaries in the United Kingdom, Germany, Sweden, and France. In addition, Asolvi has employees in Belgium, Switzerland, Poland, and the USA. At the end of 2023, Asolvi had 146 employees. In 2024 the Company is expanding its operations to Spain, Colombia, and Argentina.

## Internal guidelines

Asolvi is continuously working to ensure that our commitment to preventing human rights violations is fully reflected in the Company's guidelines and operating procedures. The senior management team has done training on the Transparency Act and conducted internal reviews to strengthen the Company's routines.

*Among the recommended actions are:*

- Include the Transparency Act requirements and strengthen the human rights aspect in Asolvi's new Code of Conduct to be launched following the release of this report.
- Continuously review content and update all relevant policies to make sure they cover essential topics regarding human and labor rights.
- Formalize responsibilities and procedures related to human rights due diligence in procurement (vendor selection) and sales (know your customer).
- Provide training for increased awareness for all employees in topics related to human rights.

## Assessment approach

Human rights due diligence focuses on identifying risks to people rather than risks to the business and requires engaging with and paying special attention to the rights and needs of individuals from groups or populations that may be at heightened risk of vulnerability.

*Human rights instruments include:*

- The Universal Declaration of Human Rights and its implementing treaties
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organization Declaration of Fundamental Principles and Rights at Work

*Among the human rights requiring special attention in operating a business we find:*

- Right to safe, healthy, and decent working conditions free from bullying and harassment
- Right to be treated fairly and without discrimination
- Right to decent and fair employment conditions and work / life balance
- Right of freedom from all forms of modern slavery including human trafficking and forced labour, as well as child labour
- Right to form and/or join trade unions and collective bargaining
- Right to privacy for those who entrust us with their personal information
- The right to express one's own convictions, opinions and concerns in good faith and without retaliation

Our approach is based on the OECD Due diligence guidance for responsible business conduct which recommend that «companies use due diligence to *identify, prevent and mitigate actual and potential adverse impacts as well as account* for how these impacts are addressed». OECD states that their guidelines are consistent with the UN Guiding Principles on Business and Human Rights.



Source: OECD

The approach seeks to identify, address, prevent and limit violations of human rights or decent working conditions – whether potential or actual impacts. Required activities include implementing the appropriate policies, processes such as risk assessments, and establishing processes to handle actual and potential adverse impacts including remedy for any violations.

## Risk identification

The risk of human rights violations varies across countries, industries as well as business processes and specific production activities. We have mapped our supply chain by country and industry risk.

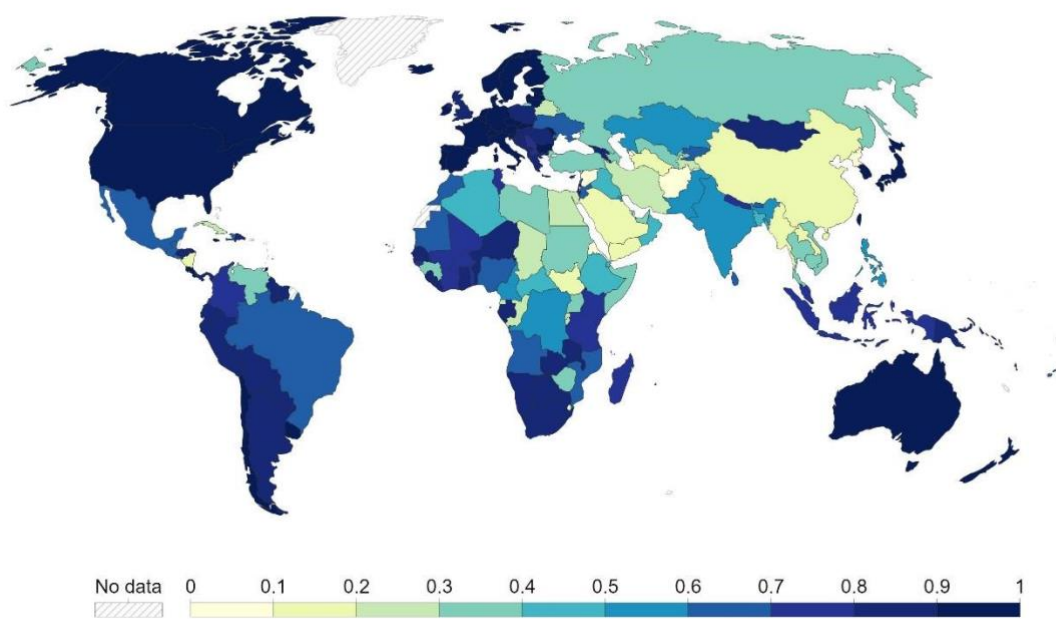
### Country risk

The country risk indicator tracks the Universal human rights index from the Office of the High Commissioner United Nations Human Rights.

## Human rights index, 2022



Based on the expert assessments and index by V-Dem. It captures the extent to which people are free from government torture, political killings, and forced labor; they have property rights; and enjoy the freedoms of movement, religion, expression, and association. The variable ranges from 0 to 1 (most rights).



Source: OWID based on V-Dem (v13)

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### Industry risk

Asolvi is a software company, specifically offering software as a service (SaaS) to other businesses. Business for Social Responsibility (BSR.org) states in their Human rights assessment of the SaaS industry: «Since most business-to-business (B2B) software services do not interface with consumers, they have fewer human rights

impacts than consumer-facing services such as social media platforms. However, B2B software can also be connected to adverse human rights impacts, and B2B software providers have a role to play in ensuring that their products and services are not used in ways that lead to harm.»

Thus, even if the software industry generally is not considered to be among the higher risk industries in terms of human rights violations in our complete value chain from procurement through to our customers, we can be exposed to business partners operating in higher risk sectors.

According to IT consultancy Bouvet there are reports related to certain providers of cloud platforms services warning of failures to comply adequately with requirements for, in particular, pay and working conditions, freedom to organize and workplace monitoring. Overall, the industry can be rated as medium risk, and main risk mitigation is choice of vendor localization.

Also, suppliers involved in producing mobile phones, laptops and computer screens can pose a higher risk for such breaches, due to complex fragmented supply chains and locations in medium to high-risk countries. The Norwegian Agency for Public and Financial Management (DFØ) publishes a list of products considered to be high risk and needing special attention in the procurement planning process. In our assessment we have noted that fashion and apparel, food and agriculture, and the mining and extractive industries are among the industries more often linked to human rights violations.

## Supply chain risk assessment

Asolvi can impact human rights through our own activities, through our procurement process (vendors) or through our customers’ activities.



In our assessment we have grouped our business partners according to country and industry risk ranked by high, medium and low risk.

### Vendors

Our vendor risk ranking shows that all vendors above NOK 200,000, representing close to 90 % of our total procurements in 2023, are located in the EU/EEA or in the USA. Close to 75 % of the vendors have published compliance self-assessments.

Software, IT services and IT hardware is the largest industry representing close to 50 % of total procurement value in 2023, with Microsoft as our by far largest service partner. Asolvi’s vendors within cloud platforms are located in the EU and the USA, thus representing a lower risk of breaches than the overall industry rating.

The Company’s main vendors of IT Hardware are the leading international manufacturers of PC’s, mobile phones and related equipment. Significant part of the production takes place in Asia, and China in particular. Asolvi’s ability to directly influence these industries is modest, except for supporting industry initiatives with a human rights agenda. Thus, Asolvi’s priority will primarily be careful vendor selection.

Financial services, consultancy services and real estate, from providers located in the EU/EEA and the USA, cover nearly all remaining procurement.

We have not received reports of or detected any human rights violations in our vendor due diligence for 2023.

### *Internal operations*

Asolvi operates in Europe and the USA with employees spread across Norway, Sweden, UK, Germany, Belgium, Switzerland, Poland, and Pennsylvania. All Asolvi offices are located in countries ranked as Free by Freedom House, on their Global Freedom Status Ranking. The Human rights index for 2023 also shows low risk for violations of human rights in the countries Asolvi is present.

As a software company Asolvi's operations are office based and the company employs highly skilled workers performing engineering work, professional services, sales, managerial and administrative work. Employees are not exposed to specific risks in the performance of their work, neither physically nor psychologically. The risk for injuries is seen as low, and policies and procedures are in place to ensure a working environment free for harassment and bullying. An employee engagement survey is conducted at regular intervals to assess the working environment and define mitigating actions.

Provisions on working hours and holiday entitlements above the minimum requirements should ensure time to rest as well as a good balance between work and private life for all our employees. Pay levels are seen as good and above the minimum wage requirements in all countries in which we operate. Processes are established in 2023 to ensure that the company works systematically with compensation, promoting equal pay and no discrimination. In general working conditions are viewed as good, with low risk related to violation of fundamental worker rights or human rights.

Asolvi has received no reports or legal claims from any employee in respect of any violation of human rights or labor standards, and no breaches of policies in relation to human rights or labor standards have been observed in 2023.

### *Customers*

More than 90 % of our customers and revenues are based in Europe, which overall are considered markets with a lower general risk of human rights violations. After Europe, the USA was our largest market in 2023.

Asolvi has a small number of customers located in Africa and the Middle East, in countries which according to the UN and Global Freedom Status Ranking require more careful attention due to generally lower political freedom and higher risk of human rights violations.

Asolvi offers software for use in specific industry segments. These are mainly related to office operations and workplace technology, as well as supporting software for technicians and operators related to fire and security monitoring of buildings and facilities. The type of service itself is in our assessment considered to carry lower risks of human rights violations but still require our continued attention on how customers use our services and what use cases are acceptable in terms of impact on the rights of employees, end-users, and other potentially impacted groups.



We have not received any reports or identified any human rights violations related to our customers' use of our products and services in 2023.

## Conclusion

This year's assessment identified no cases of human rights violations in our internal evaluation or through any of our communication, reporting, and whistleblowing channels. On a continuing basis Asolvi will maintain its monitoring in order to prevent human rights violations. The Company is prepared to sufficiently respond to any future detected or reported violations.

**Trondheim, 29 June 2023**

### **The Board of Directors**

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Chairperson of the board

Jostein Vik  
Board member

Marco Sodi  
Board member

Eirik Hjelmeland  
Board member

Erik Berggren  
Board member

Pål Rødseth  
CEO