



Tenerity's Due Diligence Assessment Report Dated June 2023 in Accordance with the Transparency Act

The Managing Director and Board of Directors of Tenerity AS make this report in accordance with the Norwegian Transparency Act (åpenhetsloven) and the Tenerity AS policy on vendor assessment and transparency.

About Tenerity

Tenerity's primary business is delivery of customer engagement platforms, programs, and value-added services for leading companies to help enrich their offerings to drive deeper connections and give their customers reasons to engage more and stay longer, thereby generating increased lifetime value. The Company primarily focuses on the financial sector and other service sectors with large membership bases. The company is located in Bærum municipality and Tenerity AS is part of the Tenerity Group, a global group headquartered in the United States.

Tenerity guidelines and routines for handling any actual and potential adverse impact on basic human rights and decent working conditions

In order to ensure that the company complies with the Transparency Act, the company has established the Tenerity AS policy on vendor assessment and transparency (the Policy). The Policy sets out the requirements of the Act and what this means to Tenerity, given the size of our company, the nature of our business, and the context within which we do business. The policy charges the Board of Directors with the responsibility of ensuring that the company complies with the Act and provides instructions on what the company should do to comply with the Act.

Supplier Code of Conduct

A central part of the Policy concern Tenerity's Supplier Code of Conduct (the Code). The Policy requires the company to follow the principles of the Code and to ensure that its suppliers do the same.

The Code requires suppliers to comply with all applicable laws and regulations as well as the following internationally recognized standards and principles:

- The Ten Principles of the United Nations' Global Compact, derived from:
 - o The Universal Declaration of Human Rights
 - o The International Labour Organization's Declaration on Fundamental Principles and Rights at Work



- o The Rio Declaration on Environment and Development, and
- o The United Nations Convention Against Corruption
- The UN Guiding Principles on Business and Human Rights
- The OECD Multinational Enterprise guidelines

Due Diligence Assessments

According to the Policy, Tenerity shall perform due diligence assessments both with regards to the company's own compliance and regarding its suppliers.

Supplier assessments

The Policy provides that in order to map and assess actual and potential adverse impact on basic human rights and decent working conditions as potentially caused by its suppliers, the company shall organize its suppliers into three categories of priority, *High*, *Medium*, and *Low*, as defined below:

High Priority Supplier: A supplier with whom the Company has an ongoing agreement for the supply of goods and/or services valued at over NOK 2 000 000 per year.

Medium Priority Supplier: A supplier with whom the Company has an ongoing agreement for the supply of goods and/or services valued between NOK 250 000 and NOK 2 000 000 per year.

Low Priority Supplier: A supplier with whom the Company has an ongoing agreement for the supply of goods and/or services valued below NOK 250 000 per year.

According to the policy, all High Priority Suppliers shall be required to commit to the Code in writing as soon as possible, while all other Suppliers shall be required to commit to the Code in writing upon renegotiation or extension of their existing contract with Tenerity. An exception to written commitment to the Code can be given in special circumstances (for example with Suppliers that have an exceedingly large number of clients) if the Supplier can properly document its adherence to the principles of the Code.

The Code was expected to be ready for implementation in the fall of 2022, but implementation has unfortunately been delayed due to a lengthy internal approval process within the group. We are pleased to announce, however, that the Code was formally approved by our parent company, Tenerity Ltd., in June 2023, and that we will be joined by our European sister companies in implementing this Code. We will thus proceed with implementing the Code among our suppliers in accordance with the Policy in Q3 2023.

The Policy further provides instructions on how to follow up with suppliers who have committed to abide by the Code to ensure that they indeed follow the Code's principles. To this end, the



Code requires that a Supplier confirms its compliance and agree to subject to an audit carried out by Tenerity. Tenerity plans to carry out such audits primarily through written questionnaires in accordance with the Policy. The level of inquiry will vary depending on each supplier's priority rating. Due to the delay of the approval of the Code, Tenerity has conducted this year's assessment without direct participation from the suppliers, considering the following factors laid out in the policy:

- the country or countries where the goods and or services are being manufactured or delivered and where the supplier is incorporated and geographically located,
- whether the supplier is subject to the Transparency Act or other similar laws requiring reporting on, and/or establishment of policies related to, human rights,
- whether the supplier has issued any reports documenting compliance in the human rights area or a commitment to protecting human rights or labor rights,
- whether the supplier operates in an industry that may typically involve a higher risk of infringement on human rights/decent working conditions,
- whether the supplier has a known history of violating human rights/decent working conditions,
- whether the supplier appears open and transparent regarding its activities, employment relationships, supply chain etc.,
- whether the company's supply chain is accessible/clear (with few subcontractors).

The assessment has not uncovered any actual or potential adverse impact by Tenerity suppliers on basic human rights and decent working conditions. Most of our suppliers are located in the Nordics countries and subject to Norwegian or similar laws and regulations. Moreover, the company is not reliant on suppliers for the provision of physical goods for resale as we are mainly a service company. The company also does not have suppliers belonging to some of the industries that are most prone to human rights violations (e.g., natural resources, agriculture, apparel and textile, construction).

Tenerity assessment

According to the Policy, the Company shall comply with all applicable laws and regulations relating to human rights and labor conditions and shall in particular comply with all relevant Tenerity policies, including the Global Tenerity Code of Conduct (which inter alia includes relevant sections on Equal Employment Opportunity, Sexual and Other Unlawful Harassment, Workplace Violence, Health and Safety) and the Tenerity Anti-bribery and Corruption Policy.

The Policy further provides that Tenerity shall undergo an annual or bi-annual assessment of its own performance within the areas of corporate sustainability, including Labor & Human Rights, and that the assessment shall be conducted in cooperation with a reputable sustainability ratings provider.

The company underwent a sustainability assessment conducted by EcoVadis, the world's largest provider of sustainability ratings, in August 2022. The assessment included the areas of



Labor & Human Rights, Environment, Ethics and Sustainable Procurement and we are pleased to announce that Tenerity was awarded a “gold medal” in recognition of sustainability achievement, placing in the 93rd percentile overall.

The assessment did not uncover any adverse impact by Tenerity on basic human rights and decent working conditions. Tenerity will continue to undergo sustainability assessments at least every other year, as required by the policy.

Approved and signed by the Managing Director and Board of Directors on June 30, 2023.