

# Transparency act report

## 2023

The North Alliance

This report has been prepared in accordance with the Norwegian Transparency Act (the “Transparency Act”) section 5 and summarises the policies and procedures in the North Alliance Norge Group (“NoA”) with respect to safeguarding of human rights and decent working conditions. The report also covers NoA Ignite AS, NoA Connect AS, Anorak AS and Scienta AS, which are independently subject to the Transparency Act.

## **About The North Alliance**

The North Alliance is Scandinavia’s leading creative-tech player specialized in creating customer-driven growth. NoA’s full range of capabilities cover all levels of strategic transformation and helps connect the entire customer journey through business consulting, advertising and communications, digital products and platforms, brand experiences and data-driven marketing. Guided by a belief in the power of creative problem-solving, a can-do entrepreneurial spirit, and a collaborative culture, NoA is on a quest to make a positive impact on the future.

NoA was founded in 2014 and currently employs approx. 1200 people across Denmark, Sweden, Norway, Finland, and Poland. NoA consists of the following companies: &Co., Åkestam Holst, Anorak, Bob the Robot, North Kingdom, NoA Health, Bold, NoA Elevate, NoA Consulting, NoA Ignite, DK&A, Unfold, NoA Connect, Axenon, Scienta, Agitec, Bluebird and App Shack.

## **NoA’s commitment to human rights and decent working conditions**

NoA works systematically with human rights, employee rights and the right to decent working conditions. The Group acknowledges all internationally recognised human and labour rights standards, and set requirements for collaboration partners, suppliers and customers. NoA’s human rights commitments are embedded in the Group’s internal policies, procedures and processes such as the diversity and equal opportunities policy, the health and safety policy, the anti-corruption policy and the ESG policy.

NoA’s employees should experience NoA as a safe workplace. NoA has zero tolerance for discrimination, bullying and harassment. This is followed up closely through employee surveys and one-to-one conversations with all employees. The Group has a whistle-blower policy, which was created to ensure that all NoA employees always feel safe to bring forward information concerning wrongdoing or unethical behaviour that they witness or hear of, within the NoA Group. Any employee who is reporting such a concern should be treated fairly and be protected from reprisal. All deviations are followed up.

During 2023 the Group has implemented a transparency act procedure to ensure that risks related to the areas of human rights and decent working conditions are satisfactory identified and considered in relation to onboarding and follow-up of our suppliers and sub-contractors, and that the appropriate level of due diligence is performed. The local finance teams are responsible for the implementation and compliance of this procedure. In 2023 the Group has also established a whistle blower channel on its website for reporting of concerns related to, but not limited to, suspected fraud and corruption, harassment and discrimination and violations of environmental and human rights laws. Up until this the Group’s whistle blower channel have only been available to the Group’s employees. The Group has not received any matters for concern through this channel during 2023.

## **Due diligence with respect to human rights and decent working conditions**

The human rights due diligence process is integrated in each NoA company's relevant business process, such as risk assessments, procurement practices and supplier due diligence processes. In line with the principles of the Transparency Act the Group applies a risk-based approach when evaluating risks of adverse impact on human rights and decent working conditions. This involves looking at the location and context of operations, nature of activity, the number of people that are potentially affected and severity and probability of impact.

### **Risk assessment**

NoA operates in a low-risk environment with regard to human rights impact as the Group's operations mainly are located in the Nordic countries. These countries are highly regulated in the areas of labour rights and health and safety, with high levels of human development and low risk of violations of fundamental human rights.

The Group delivers a range of services within the areas of technology, design, marketing and communication. The services are provided by own employees in the Nordics and Poland, in addition to some suppliers and sub-contractors. The risk related to own employees is considered low, as the Group's own operations are considered to be well managed through existing systems, policies and procedures. Suppliers and sub-contractors used by the Group is also mainly located in the Nordics and the risk related to these is also considered low.

The Group has analysed purchases made by the Group in 2023, and have categorized suppliers and sub-contractors where the Group spending is above 100.000 Norwegian kroner. More than 400 suppliers have been categorized into type and product category. In the analysis the suppliers have been assessed based on the risk related to human rights and decent working conditions and the Group's degree of impact on these suppliers and sub-contractors. The list of suppliers have also been compared to the list for 2022 and the largest new suppliers and sub-contractors have been assessed further.

International cloud and platform providers are used in certain service deliveries. There is information that some of these providers might not sufficiently comply with the human rights requirements related to pay and working conditions, the right to unionize and monitoring of employees. NoA acknowledges that there might be human right breaches related to these providers, however, given NoA's size, the Group has limited impact on these providers.

### **Mitigation of risk**

Based on the risk analysis, the Group has not identified actual adverse impacts on fundamental human rights and decent working conditions linked to the Group's operations. The Group has identified increased risk of breaches related to international cloud and platform providers. Unfortunately, the Group considers its degree of impact on these providers to be limited, and hence no corrective action plans have been initiated. The risk assessment will be revised on a

yearly basis or as needed to ensure that the NoA Group remains responsive to changing circumstances and emerging risks.

**Oslo June 24, 2024**

**The board of directors of The North Alliance Norge AS**

_____ Sign. Thomas Høgebøl Chairman	_____ Sign. Lars Kreken Board member
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**The board of directors of Anorak AS**

_____ Sign. Thomas Høgebøl Chairman	_____ Sign. Lars Kreken Board member	_____ Sign. Per Arne Josephson Managing Director
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**The board of directors of NoA Connect AS**

_____ Sign. Thomas Høgebøl Chairman	_____ Sign. Lars Kreken Board member	_____ Sign. Andre Gurrik Managing Director
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**The board of directors of NoA Ignite AS**

_____ Sign. Lars Kreken Chairman	_____ Sign. Thomas Høgebøl Board member	_____ Sign. Kristine Ildahl Bjørnstad Managing Director
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**The board of directors of Scienta AS**

_____ Sign. Thomas Høgebøl Chairman	_____ Sign. Lars Kreken Board member	_____ Sign. Kjell Nybråten Managing Director
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