

2025

Devoteam The Transparency Act



VEEP

Value | Environment
Ethics | People

AI-driven tech consulting

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1. Introduction

The Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the transparency act) came into effect 1st of July 2022. Section 1 of the Act describes its purpose and states that the Act shall promote companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and ensure public access to information on how companies handle negative consequences for fundamental human rights and decent working conditions.

Section 5 of the Transparency Act explains the company's obligation to annually publish a statement on the due diligence assessments they have conducted. The statement must at least include: a) a general description of the company's organization, operational area, policies, and procedures for handling actual and potential negative consequences for fundamental human rights and decent working conditions. b) information on actual negative consequences and significant risks of negative consequences that the company has uncovered through its due diligence assessments. c) information on measures that the company has implemented or plans to implement to stop actual negative consequences or reduce significant risks of negative consequences, and the results or expected results of these measures

The purpose of the following statement is to provide the public with insight into how this responsibility is anchored in Devoteam AS, findings made by the due diligence assessments, and what measures have been implemented. The Consumer Authority has developed a guide which has been utilized in our statement. The guide applies for the period between January 1st and December 31st 2022, but has since been updated with important changes, cf. the Transparency Act § 5 fourth paragraph.

1.1 About Devoteam AS

Devoteam AS is one of Norway's leading consulting companies in digital transformation. We assist our customers from the early stages with design and strategy, to management and implementation of digital transformations. We are partners with the five leading providers of cloud technology: Microsoft, Google, AWS, Salesforce, and ServiceNow. As part of the Devoteam Group with headquarters in Paris, we are represented in over 20 countries with more than 10,000 consultants across EMEA.

1.1.1 The organizational structure

Devoteam AS is a wholly owned subsidiary of Devoteam SA in France. The general manager is Jonas Höfde. In Norway, we are organized according to areas of expertise as explained in the next section, as well as internal functions. The internal functions include HR, Marketing, Sales, and Finance.

Purchasing

Purchasing mainly involves the acquisition of consulting services from other consulting companies or sole proprietorships, with which Devoteam AS has good knowledge and relationships. All purchases are made according to written agreements and follow Devoteam SA's established rules and procedures, including Corporate Social Responsibility (CSR) charter, questionnaire, and selection criteria. All subcontractors of consulting services and all employees must sign Devoteam AS's ethical guidelines. The ethical guidelines are attached to this report.

1.1.1.1 Competence areas

At Devoteam AS, all consultants are divided into teams according to their specific areas of expertise, such as change management, business systems, and architecture. What they all have in common is strong customer focus and supporting the customer in the transformation and change journey they are embarking on.

Devoteam offers a range of services in Norway, spanning various areas within security and business consulting. Here is an overview of our service portfolio:

Organisational development: Agile and Cloud Operating Model, evaluating the potential of agility and cloud, establishing a Cloud Centre of Excellence, and agile team transformation.

Data strategy: Includes data strategy, data governance, data platform and data architecture.

Business systems: Services within Enterprise Resource Planning (ERP), Human Resources Systems (HCM), Learning Management Systems (LMS), compensation, CRM and other business systems.

Leadership and change: Offers insight, strategy, vision, concept evaluation, project-, program- and process management, organizational development and change management, as well as portfolio management.

Security consulting: Includes security management and strategy, security culture and training, privacy, and security architecture.

2. Due Diligent Assessments

A due diligence assessment is a process where businesses identify, prevent, mitigate, repair, and account for risks of harm caused by their own operations, through the company's supply chain and business partners. In this context, the supply chain refers to any entity that supplies goods or services to Devoteam AS. We collaborate with business partners both directly and indirectly through the services we offer to our customers, as well as through industry-related cooperation. As a trusted partner of our customers, Devoteam AS continuously works on risk assessments related to fundamental human rights and decent working conditions.

In the due diligence assessment, we have based our approach on the OECD's due diligence guide and sector guide (see Figure 1 below), as well as the UN Guiding Principles on Business and Human Rights and their reporting framework. Devoteam has previously worked closely with the UN and has been a signatory member of the UNGC (United Nations Global Compact) since 2017, committing to follow the UN's guiding principles and sustainability goals.

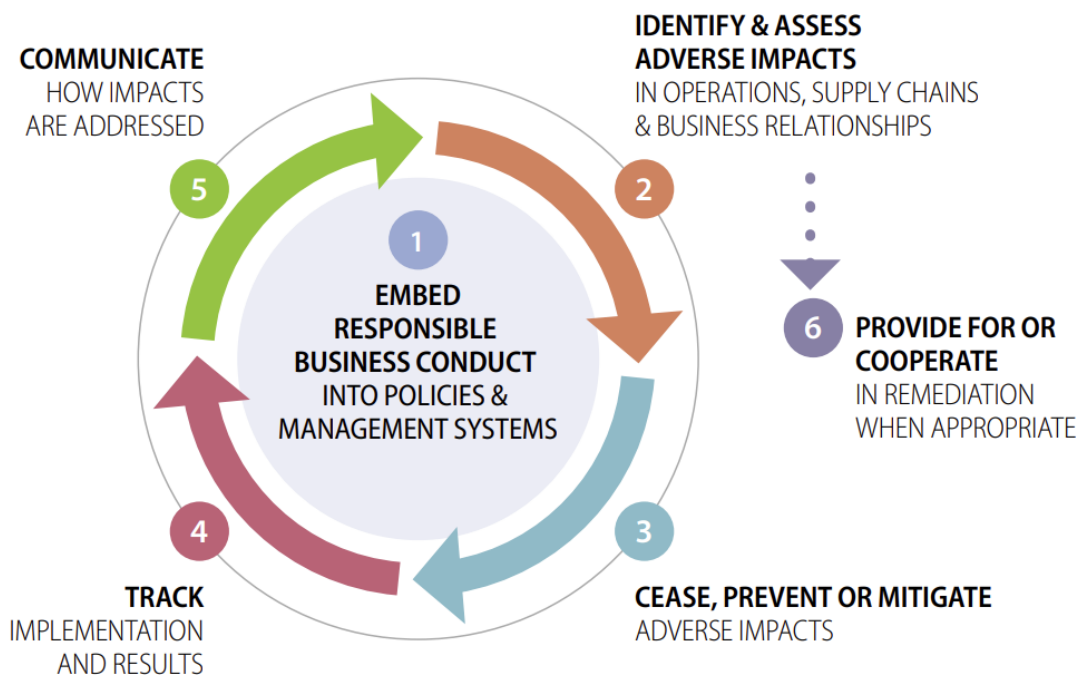


Figure 1 OECD Due Diligence Assessment

1.1 Securing commitment

According to the Transparency Act § 4 first paragraph letter a, Devoteam AS as a business must ensure that we have adequate guidelines and procedures in place to safeguard fundamental human rights and decent working conditions, anchored in our management system.

The Devoteam Group has this high on its agenda and, after mapping the risks, both internal and external, that the group is exposed to and can influence and limit, has implemented a sustainability strategy called VEEP (Value, Environment, Ethics, People). Devoteam AS bases its strategy on the

four dimensions of VEEP (see Figure 2 below). More information about the continuous work Devoteam is doing in this area can be found here: <https://www.devoteam.com/csr/>

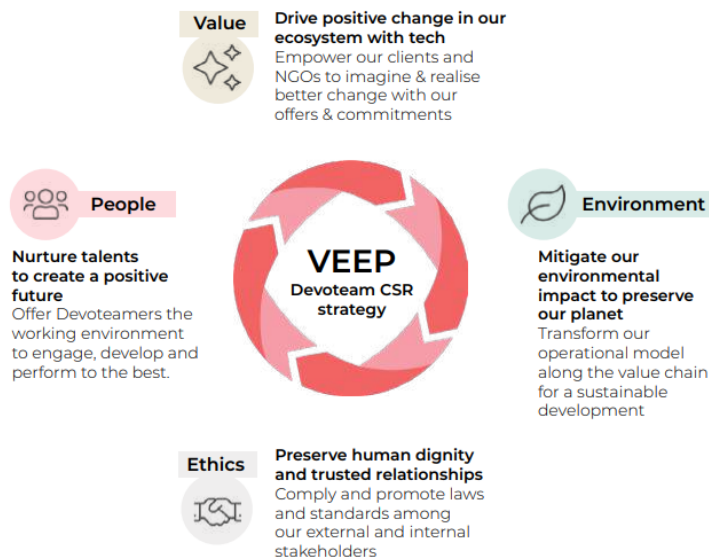


Figure 2 The four dimensions of VEEP

Through VEEP and its close work with the UN and adherence to their sustainability goals, Devoteam seeks to influence goals both directly and indirectly, as described in Figure 3.

Goals we directly affect



Goals we indirectly affect



Figure 3 sustainability goals Devoteam aspires to affect

At Devoteam AS and in the Devoteam Group, we are committed to complying with all legal requirements regarding how we conduct our business. In addition to the Transparency Act, key laws include the Working Environment Act, the Personal Data Act, and the Accounting Act.

We focus on the guidelines that Devoteam AS considers most relevant to this statement.

1.1.1 The Devoteam Group's Corporate Policies

The Devoteam Group has developed clear ethical guidelines called CSR (Corporate Social Responsibility) Ethics, which are listed in figure 3 below. Devoteam AS, like every other company in the Group, follow these guidelines.

- ▶ complying with the law
- ▶ preventing conflicts of interests
- ▶ corruption & anti-competitive practices
- ▶ compelling with data protection and cybersecurity
- ▶ ensuring sustainable relationships with our stakeholders & providers

Figure 4 Devoteam's ethical guidelines

Procedure for handling suppliers

Suppliers are an important part of Devoteam's business operations and help ensure that the group can offer quality to the end customer. In some cases, subcontractors are also responsible for the final result and thus become Devoteam's face to the outside world. It is therefore important that suppliers, like Devoteam, are aware of their responsibility and that Devoteam's ethical guidelines are followed at all levels of the value chain. This is also ratified in VEEP, as described earlier.

Employee handbook

Devoteam AS has developed a digital employee handbook which all employees have access to and are introduced to when hired.

The topics included in the handbook are guidelines, employment, employee development, working hours, overtime, salary, compensation models, vacation and time off, benefits, sick leave, leave of absence to care for a child, parental leave, other leaves, pension and insurance, travel, health, environment and safety, information upon termination of employment, breaches of guidelines.

All employees have their own personnel managers or team leaders with daily communication with the employee. All managers with responsibility for personnel must hold annual employee interviews. In addition, Devoteam AS conducts frequent online surveys among employees to

quickly identify issues that need to be clarified. This is in addition to the Devoteam Group's annual, more comprehensive survey, Devomood.

The employees are represented on the board of Devoteam AS with two representatives and one deputy representative, in addition to having a safety representative and a Working Environment Committee (AMU) representative, all of whom are elected by the employees. A new election of employee representatives is conducted every other year.

All employees are followed up on closely, and we have a structured process for the development of our employees. This is openly available on our intranet. Here you will find information about career progression, salary framework, and role expectation matrix for the various levels of development. All employees have access to this information, and all managers receive training in these processes. In addition, we have all personal data stored in a common HR system, where the processing and maintenance of all data also takes place.

Our personnel policy assumes a well-thought-out compensation policy that stimulates the improvement of the business and the ability to achieve the company's and the individual's goals. Salary and conditions are an important management tool – they must be competitive and incentivize the right work effort. To ensure this, Devoteam must be able to recruit, develop, and retain well-qualified and motivated employees. An important tool in this regard is proper performance management, where leaders clarify goals, involve employees, and take responsibility for ensuring that goals are met, tasks are completed, and results are achieved.

Whistleblowing channels and complaint mechanisms

Whistleblower procedure

Devoteam SA has developed a clear and thorough whistleblower procedure, which Devoteam AS follows, and which is available for all employees, subcontractors and suppliers.

More information regarding Devoteam's alert system can be found here: [Ethics alert system • Devoteam](#)

To ensure anonymity and impartial treatment, Devoteam SA hired an external supplier of the alert system utilized by the Group. The supplier treats all reports independently of the Devoteam Group and sends an anonymous report to the body established by the Group for this purpose, Group Ethics Alert Committee.

The system shall primarily capture the following:

- Crime and violations, including corruption
- Serious and obvious violations of a law, regulation, or international treaty
- Violations of obligations defined by European regulations and the Monetary and Financial Code, CMF or by the general regulations of the Financial Supervisory Authority, AMF.
- More specifically, any situation that is in violation of the group's code of conduct or the established anti-corruption regulations.

Operation



Figure 5 Devoteam's Whistleblower procedure

2.2 Assessment of risk in the supply chain

Devoteam AS has a long history of daily cooperation with its subcontractors and continuously assesses the subcontractors and their compliance with the requirements set by both Devoteam AS and Devoteam SA. New suppliers are carefully evaluated for compliance with laws, regulations, and internal guidelines. In addition to this, Devoteam AS has conducted a survey of its suppliers. The goal of this survey is to identify which areas pose the highest risk for a negative impact on human rights and decent working conditions.

The assessment follows the Transparency Act § 4 first paragraph letter b. We have focused on suppliers from whom we have purchased goods or services for 2 MNOK or more annually. Additionally, suppliers operating within an industry that is considered to have a particular risk are included in the mapping. An example of such a supplier is a provider of cleaning services. In the assessment, Devoteam Group uses EcoVadis and its own questionnaire. Through the independent third-party tool EcoVadis, suppliers conduct a self-evaluation based on questions defined by EcoVadis. The questions cover areas such as the environment, labor and human rights, ethics, and sustainable procurement. The answers and accompanying documentation are evaluated by EcoVadis. Each supplier is ranked on a scorecard within each focus area, and points of improvement within each area are identified.

2.3 Findings on negative consequences

Devoteam AS has not made any special findings other than a lack of documentation from certain suppliers. The finding regarding the lack of documentation must be seen in the context that the requirement for a transparency report is relatively new and will take some time to be fully implemented by all companies. Where there is a need for changing procedures, we have entered into direct dialogue with the suppliers concerned.

2.4 Measures

The assessment has shown that continuous close follow-up of the selected suppliers is necessary, even where the services provided are not initially considered complex or involve long-term deliveries, such as cleaning services, fruit, and lunch suppliers.

Summary and reflection

In terms of frameworks and regulations, Devoteam AS benefits from being part of a larger group. Much is therefore already taken care of and in place when it comes to working with the Transparency Act. However, the assessment has shown that a continuous process around these issues is important. The process has also created increased awareness of issues related to human rights, corruption, etc. Devoteam AS is in the early stages of conducting these assessments and appraisals, and processes and routines will be improved and intensified going forward.

