

Papirfly Transparency Act

This report covers the period 1 January – 31 December 2025

Papirfly AS is a Norwegian software company developing and delivering brand management solutions (SaaS) to organisations globally. The company is part of the Papirfly Group, headquartered in Oslo, with operations across Norway, Denmark, The United Kingdom, Sweden, Germany, France, Estonia, The Czech Republic, and The United States. The Group had an average of 269 full-time employees in 2025. For full details on the Group's structure and financial position, see the consolidated annual financial statements for 2025.

The Transparency Act, adopted by the government on July 1, 2022, aims to promote companies' adherence to human rights and decent working conditions while ensuring public access to information. The Act introduces obligations such as providing information and conducting due diligence assessments.

Papirfly AS is an international company that highly values these principles. We operate in accordance with the Transparency Act and actively collaborate with suppliers and business partners to foster respect for fundamental human rights. Maintaining long-term and open dialogues with all third parties is a key aspect of Papirfly's strategy, consequently contributing to the overall success of our initiatives.

As part of our strategies, Papirfly AS strives to influence stakeholders within complex value chains to assume responsibility for safeguarding basic human rights and decent working conditions for all individuals involved. The process of due diligence assessments involves identifying, preventing, and addressing actual and potential negative incidents, both within our own operations and with our suppliers and partners.

Papirfly AS is committed to continuously working towards protecting human rights, irrespective of gender, orientation, ethnicity, religion, political affiliation, or other personal characteristics. This commitment extends to our own organisation, suppliers, and partners, and remains a top priority for Papirfly AS.

Due diligence must be conducted regularly and should be proportionate to the enterprise's size and nature, the context of its operations, and the severity and likelihood of adverse impacts on fundamental human rights and decent working conditions, in alignment with the OECD Guidelines for Multinational Enterprises. Under this Act, due diligence entails:

- A. Embedding responsible business conduct into the enterprise's policies.
- B. Identifying and assessing actual and potential adverse impacts on fundamental human rights and decent working conditions caused or contributed to by the enterprise, including those directly linked to its operations, products, or services through the supply chain or business partners.
- C. Implementing appropriate measures to cease, prevent, or mitigate adverse impacts based on prioritizations and assessments identified in point (B).
- D. Tracking the implementation and effectiveness of the measures described in point (C).
- E. Communicating with affected stakeholders and rights-holders regarding how adverse impacts are addressed as per points (C) and (D).
- F. Providing for or cooperating in remediation and compensation where required.

Software as a Service (SaaS) companies typically present a lower risk regarding human rights and labor conditions. This is due to their office-based, high-skilled environments, which involve fewer physical risks.

Since Papirfly primarily partners with companies located in the EU, Switzerland, the US, and the UK, the vast majority of our partners operate in low-risk environments regarding human rights violations and labor standards.

Furthermore, our suppliers are required to adhere to Papirfly's "Supplier Code of Conduct" which sets out our requirements related to human rights and sustainability.

Papirfly's own workforce consists of office-based, highly skilled employees located across countries with robust labour law protections. No adverse impacts on human rights or working conditions have been identified in the Group's own operations.

Responsibility for conducting the annual due diligence assessment is managed by Procurement in collaboration with senior management. The process includes distributing a supplier questionnaire, reviewing responses, and reporting findings annually.

The 2025 supplier assessment focused on identifying risks related to human rights and working conditions within the supply chain. A total of 185 suppliers were evaluated, with a

response rate of 47.6%. Notably, the respondents represent 73.6% of the total spend, indicating that the majority of the company's financial exposure is covered by the due diligence process. No significant risks or negative impacts were identified by any of the responding suppliers.

The supplier base is split between domestic and international entities:

- Norway (NO): 86 suppliers (46.5%)
- International (INT): 99 suppliers (53.5%)

The international suppliers are distributed across various countries, with a significant portion of the spend concentrated in global service providers.

The questionnaire was sent to all active suppliers. The participation rate shows a strong engagement from high-spend suppliers, 73.6% spend coverage ensures that the most critical suppliers have been assessed.

The assessment measured two primary indicators of corporate responsibility:

- Code of Conduct
95.5% of respondents confirmed they have a written Code of Conduct or internal policy committing to fundamental human rights.
4.5% reported they do not yet have a formal policy in place.
- Due Diligence Process
89.8% of the respondents have a documented process for identifying and assessing risks in their own supply chains.
10.2% do not currently have a formal due diligence process.

None of the responding suppliers identified any actual negative impacts or significant risks related to human rights or working conditions in the past 12 months. As no risks were identified, no corrective actions were required or reported.

The 2025 assessment demonstrates a high level of policy compliance among the core supplier base. The primary focus for the upcoming year will be:

- Target the remaining suppliers, particularly those in higher-risk categories or with increasing spend.
- Engage with the suppliers lacking formal due diligence processes to encourage alignment with international standards and our own Code of Conduct requirements.
- Maintain the annual assessment cycle to ensure any emerging risks are captured promptly.



Date: 30.06.2026

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Niklas Savander
Chairman of the Board

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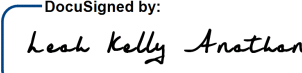
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