



Report Transparency Act

25 June 2025

Content

1	Spir Group Transparency Act 2024	3
1.1	Introduction	3
1.2	Contact information	3
1.3	Reporting obligations	3
2	About the company	4
2.1	Company organization and area of operation	4
2.2	Internal guidelines	4
2.3	Goals and progress	4
2.3.1	Overview of goals and progress	4
2.3.2	Goals for the coming year	5
3	Due diligence assessment	6
3.1.	Overview of the company's focus for due diligence assessment - methodology	6
3.2	Due diligence assessment of the company's products and services	8
3.3	Results on the due diligence assessment	8
4	Restoration and compensation	9

1 Spir Group Transparency Act 2024

1.1 Introduction

Spir Group ASA ("Spir Group" or "the company") shall each year conduct due diligence assessments in accordance with the Norwegian Transparency Act and publish a report on these assessments.

The purpose of the Transparency Act is to promote respect for fundamental human rights and decent working conditions.

This report covers Spir Group's obligation to report on the due diligence assessments conducted by the company during the spring of 2025. It also describes the measures that have been considered and implemented to reduce the risk of negative impacts that the company's activities and business relationships may have on fundamental human rights and decent working conditions.

1.2 Contact information

quiries about this report can be directed to:

Anny Margrethe Bratterud

HR Director

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1.3 Reporting obligations

Spir Group's HQ is located at Dronning Mauds gate 10, Oslo, Norway. The company is also present in Sweden.

Listed Norwegian companies or companies that meet two of the following three criteria: revenues over NOK 70 million, assets of more than NOK 35 million, and more than 50 employees, are required to report under the Transparency Act. Spir Group meets all these conditions and is therefore subject to the reporting requirements.

2 About the company

2.1 Company organization and area of operation

Spir Group is a software company. The company provides, among other things, systems for automating document management, streamlining property processes, data analysis, and geodata services.

The company's customers include entities within the public sector and private businesses in real estate, property development, banking, and power companies, to name a few.

At the end of 2024, Spir Group had 368 full-time equivalents and operates in Norway and Sweden.

2.2 Internal guidelines

Spir Group has procedures for how we anchor the work with ethical guidelines, anti-corruption, human rights and decent working conditions. The procedures include the company's efforts to meet the requirements set forth in the Transparency Act.

Spir Group's procedures are approved by the company's board of directors and have been communicated to the company's employees. The procedures describe how the company conducts its due diligence assessment and evaluation of measures.

The procedures also include information about the company's whistle-blowing channels, which aim to uncover negative impacts on fundamental human rights and decent working conditions related to the company's activities, as well as how such information is followed up. The company's safety representative and Working Environment Committee play a central role in this work, including through regular working environment surveys and follow-up of received notifications. This ensures that challenges related to the working environment are identified and addressed in a systematic and inclusive manner.

2.3 Goals and progress

2.3.1 Overview of goals and progress

Spir Group works to reduce the risk of human rights violations and uphold decent working conditions, both within our own company, across our supply chain, and among our business partners, in addition to compliance with the applicable regulations in the Working Environment Act.

We continuously assess risks associated with our company's activities and our business partners. At the same time, Spir Group continuously implements measures to achieve the goals set by the company. Spir Group now reports on equality and diversity, has carried out an ESG project throughout the year, and maintains a climate account. For a detailed description of the work carried out in the reporting year, please refer to sections 3 and 4 of the report.

2.3.2 Goals for the coming year

We have set several specific goals for the future.

Goal	Status
We will further develop the due diligence assessment based on the experiences we gain.	Continuous measurement and mapping.
We aim to improve the competence within our organization regarding sustainability and responsible procurement practices. This will be done by improving supplier onboarding and consistently obtaining signed supplier declarations.	<p>In progress. We have been diligently working to elevate sustainability competence within the company, and employees can take online courses. Several employees in various roles have also taken courses that provide academic credits with exams at BI within sustainability. The guidelines towards our suppliers is enforced.</p> <p>Spir Group carried out an ESG project during 2024 with assistance from Deloitte to report in accordance with the EU's CSRD regulations for publicly listed companies. A climate account was also prepared in this project. Several key employees participated in the project on behalf of their departments.</p> <p>The double materiality assessment that was conducted has given the company increased insight into risks and opportunities throughout the entire value chain. Both upstream and downstream activities and actors have been mapped.</p> <p>As a result of new regulations, Spir Group is no longer required to report under the CSRD for the financial year 2025, but prepares an annual sustainability report that is published on the company's website.</p>
We will update the guidelines for our work with the Transparency Act based on the experiences we gain.	In progress.
We will make sure that our subsidiaries who are, or will be, subject to report on the Transparency Act, will use our templates and methodologies.	Adapted and measured for all companies in the Group.

3 Due diligence assessment

3.1 Overview of the company's focus for due diligence assessment - methodology

Spir Group oversees and assesses the risk of violations of fundamental human rights and decent working conditions related to the company's activities and business relationships. The responsibility for this lies with the HR department.

To comply with the legislation, a project group has been established, led by the company's HR director. The group has conducted a due diligence assessment and mapped out who we do business with, what we are trading, and the processes followed by our business partners. The due diligence assessment has identified which suppliers we need to look further into and follow up on. At the same time, we have identified which activities should be prioritized if issues arise that are not compatible with ethical trade. The due diligence assessment has been conducted in accordance with the OECD Guidelines for Responsible Business Conduct. The project group has been continuously working on due diligence assessments since the Transparency Act was introduced in July 2022.

The company has followed the six steps of the due diligence process (Figure 1) and our guidelines for our work with the Transparency Act.

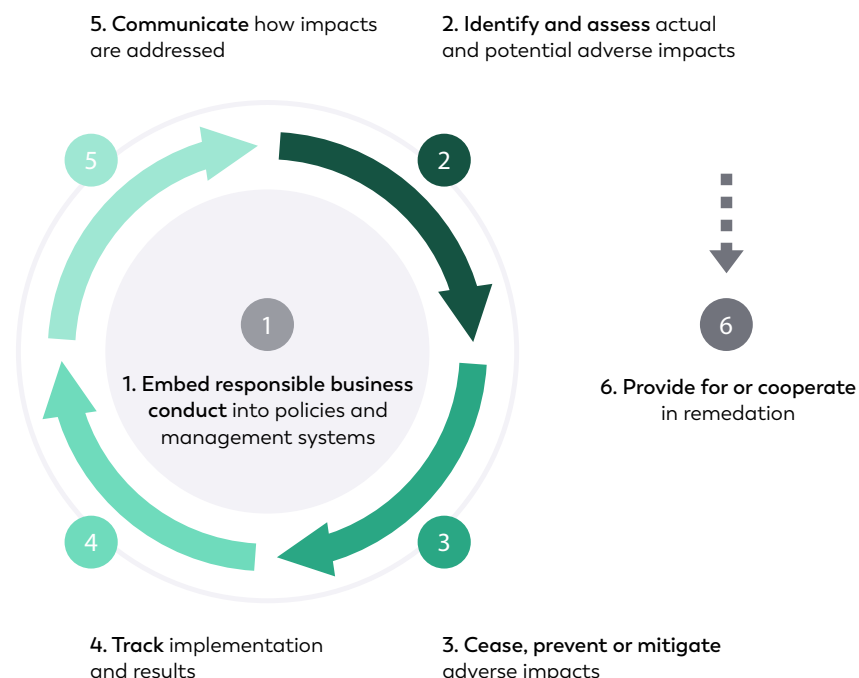


Figure 1: The six steps in the due diligence process

Description of activities and findings for each step in the due diligence process

Step	Activities and findings
1 Embed responsible business conduct into policies and management systems	<ul style="list-style-type: none"> Establish a project group and decide in the management team where the responsibility for the Transparency Act belongs within the organization. Anchor and decide on the process in management meetings and the company's highest board. A representative from the board participated in the ESG project where we conducted a double materiality analysis. Continuously review relevant internal and external documents and systems according to the routines in corporate governance. Documents that have been fully or partially updated. Several of the same documents are regularly updated in accordance with ISO guidelines (supplier policy, procurement procedures, and code of ethics).
2 Identify and assess adverse impacts	<ul style="list-style-type: none"> With several hundred suppliers, risk assessment of suppliers is challenging. We used the following principles to identify and assess a selection of high-risk suppliers: <ul style="list-style-type: none"> Size: Large companies (measures by revenues) where we have significant influence.. Geography: Apart from Norwegian suppliers, the company has only three foreign. We chose to include all non-Norwegian suppliers in further investigations. Industry: We chose to focus our assessment on suppliers within banking, insurance, software companies, advertising, information systems, and equipment suppliers. Goods: The company has not assessed specific goods with varying risk levels but is considering doing so in the next due diligence assessment. Business managers then reviewed our supplier portfolio and identified suppliers with a high risk of violations of human rights and decent working conditions. Based on this, we sent out customized questionnaires to gather additional information. These were sent to 92 different suppliers. Although we worked systematically to collect responses, we achieved a response rate lower than in the previous assessment. The materiality analysis that was conducted has given us better insight into the value chains of the various suppliers. These data are now being compiled.
3 Cease, prevent or mitigate	Based on the responses from the questionnaire, we divided the suppliers into groups with tailored follow-up. Based on the assessments we have conducted, we have no basis to state that there are, or are suspected to be, any violations of human rights or decent working conditions.
4 Track implementation and results	<p>We have the following plan for continued monitoring:</p> <ul style="list-style-type: none"> Supplier risk is treated as a separate risk within the company's overall risk management work. Further develop the company's procurement system to categorize suppliers, making risk identification and assessment easier. Supplier follow-up and ensuring that more suppliers sign the supplier declaration.
5 Communicate how impacts are addressed	<p>Spir Group actively uses this mapping to strengthen its work with the Transparency Act.</p> <p>The disclosure is easily accessible on our website: https://spirgroup.com/corporate-governance</p>
6 Provide for or cooperate in remediation when appropriate	The final step in the due diligence assessment is not relevant in this year's disclosure because we have not uncovered significant findings that require further action.

3.2 Due diligence assessments of the company's products and services

Our largest suppliers include actors within banking, insurance, software development, advertising, information systems, and IT equipment. We have chosen to conduct due diligence assessments of these suppliers. In addition, the company uses consultancy services, which are also included in our due diligence assessment.

Scope: Spir Group practices a risk-based approach based on the proportionality principle in the Transparency Act. The routines and processes related to the Transparency Act are tied to the company's business operations, supply chains, and business partners. Spir Group's own operations are assessed as low risk, based on well-established internal processes and a high degree of compliance with applicable Norwegian legislation.

Limitations: Spir Group does not carry out due diligence assessments in all our partly owned companies but influences them through ownership governance procedures and supplier follow-up. We have few business partners who deliver services directly to the company, and these are not assessed. Our business partners are primarily Norwegian, and we consider them to be low-risk actors in relation to violations of fundamental human rights and decent working conditions.

3.3 Results of the due diligence assessment

For the reporting year 2024, Spir Group has not uncovered any violations of human rights or decent working conditions. No significant risks of violations or other negative impacts have been identified either. Our experience shows that the work with the Transparency Act has contributed to a strengthened dialogue with our suppliers, which we see as an important positive effect. Our suppliers largely comply with applicable laws and regulations.

4 Restoration and compensation

Spir Group has not uncovered any cases requiring restoration in the reporting year.

Oslo,
25.06.2025

Sign.

Per Haakon Lomsdalen
CEO

Sign.

Rolv Erik Ryssdal
Chair

Sign.

Sigrun Syverud
Board member

Sign.

Preben Rasch-Olsen
Board member

Sign.

Jens Rugseth
Board member

Sign.

Monica Beate Tvedt
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