



Human Rights Transparency Statement

2023



Contents

3
4
4
4
5
6
7
7
8
8
8
9
10
11
11
12
13

Introduction

Crayon believes in the treatment of employees with respect and dignity in our own operations and in our supply chain. Forced labor, slavery, excessive working hours, underpayment of wages and benefits, and inhumane working conditions are some of the pernicious social justice issues Crayon must vigilantly safeguard against.

Crayon strives to meet recognized international human rights standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Through our human rights due diligence activities, we aim to contribute to the achievement of the United Nations Sustainable Development Goals (SDGs), with a particular emphasis on *Goal 8: Decent work and economic growth* and *Goal 10: Reduced inequalities*.



Purpose of the statement

Crayon’s Human Rights Transparency Statement is published in accordance with Norway’s Transparency Act of 2022 (NTA) and the United Kingdom’s Modern Slavery Act of 2015 (UK MSA). The statement describes the steps Crayon takes to uphold labor and human rights, including promoting decent working conditions and combatting modern slavery and human trafficking.

The reporting period covered by this statement is Crayon’s 2023 financial year which spanned 1 January 2023 to 31 December 2023.

Group statement

Crayon Group Holding ASA publishes this statement on behalf of the Crayon group, including:

CRAYON ENTITY	LEGISLATION
Crayon Group Holding ASA Crayon Group AS inclusive of: • Complit AS • Crayon AS • Crayon IOT SA • Esito AS • Inmeta Consulting AS • Inmeta Management Consulting AS • Puzzlepart AS	Norway Transparency Act of 2022
Anglepoint Limited (Anglepoint UK) inclusive of*: • Fisher Analytics and Control Technology Limited • Fisher IT Asset Consulting Limited • Fisher IT Services Holdings Limited Crayon Limited (Crayon UK)	United Kingdom Modern Slavery Act of 2015

*Note: Section 54 of the UK MSA does not apply to Anglepoint and its Fisher entities, but we are choosing to report voluntarily.

The global policies, procedures, programs and activities described in this statement cover our entities reporting under the NTA and the UK MSA.

Access to the statement

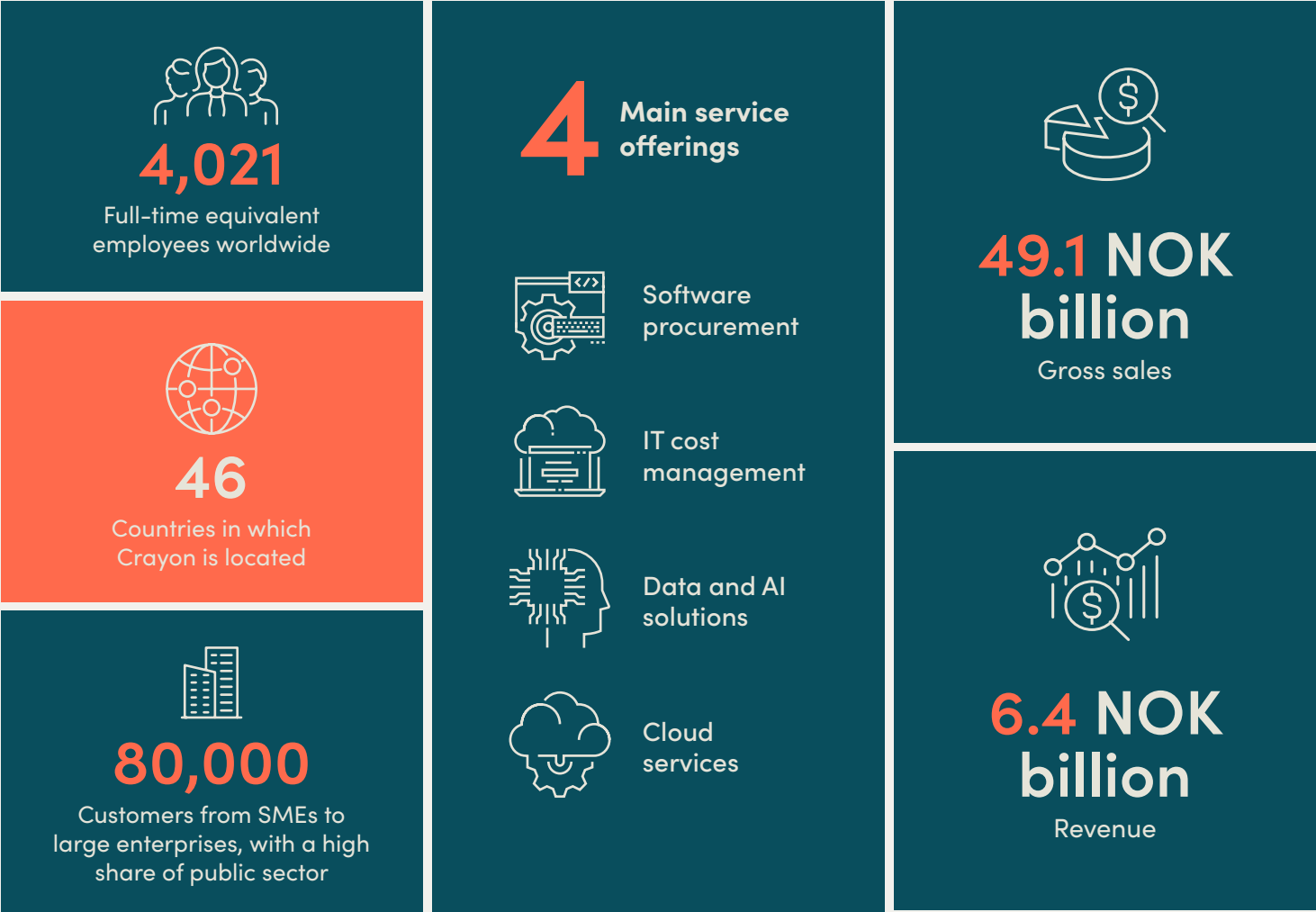
The statement is available online on Crayon’s global website as well as our UK website. It should be read in conjunction with Crayon’s 2023 Environmental, Social and Governance Report which provides additional information on topics such as labor and human rights; diversity, equity and inclusion; health and safety; data privacy and security; and responsible AI.

Our structure, operations and supply chain

Crayon Group Holding ASA (Crayon) is a Norwegian information technology (IT) consultancy. We are a publicly traded company listed on the Oslo Børs (Oslo Stock Exchange) under the ticker code CRAYN.

Crayon Group Holding ASA is the holding and parent company of the Crayon Group, with global headquarters in Oslo, Norway. Through various subsidiaries, Crayon has an operational presence in 46 countries worldwide in the form of sales, consulting, and technical support offices.

We help customers reduce costs, optimize their software and cloud, and leverage new opportunities in AI. We have a global supply chain, partnering with thousands of software suppliers and three hyperscale cloud providers to deliver our services.



Identifying potential labor and human rights risks

Crayon specializes in IT software and services and occupies a niche position in the knowledge economy. We have a large international footprint, interacting with thousands of software suppliers and three hyperscale cloud providers (upstream), as well as myriad resellers and end customers (downstream).

Crayon activities undertaken in relation to the upstream and downstream actors in our value chain include the sale/licensing, deployment, development, design and marketing of software services and solutions.

Against this backdrop, identifying and understanding the salient labor and human rights risks we face in our own operations and in our value chain is an area where we are evolving. We are open to engaging with our internal and external stakeholders to ensure we have an inclusive and collaborative approach to human rights due diligence.



Potential labor and human rights risks in Crayon's own operations

Many of the countries in which Crayon operates have robust local laws to protect worker well-being and to prevent, detect and remediate the violation of workers' labor and human rights.

Crayon actively enforces these legal requirements in our business, and in so doing, reduces the risk of the potential occurrence of slavery, human trafficking, inhumane working conditions and other labor and human rights issues.

For example, in the United Kingdom we conduct statutory eligibility to work checks of prospective candidates and verify that individuals have their own bank accounts. We rarely partner with employment agencies, and when we do, it is for candidate referrals to identify prospective employees who might be a good fit with Crayon. If successfully recruited, the candidates have a direct relationship with Crayon.

In addition, on the rare occasions that we work with employment agencies, we subject them to a vetting process to ensure they are compliant with the UK Modern Slavery Act.

We adopt a similar approach in Norway, adapted to the local regulatory context.

Potential labor and human rights risks in Crayon's supply chain

Crayon's operations primarily involve digital transactions rather than physical goods, and we maintain relatively short supply chains with minimal subcontracting. We have the most leverage to advocate for labor and human rights and overall ethical conduct in instances where we have direct contractual relationships. We launched our Crayon Integrity Partnership Program in 2023 to enable constructive dialogue with our suppliers captured in formal memoranda of understanding.

Viewed through a country risk lens, based on currently available information, a number of the software suppliers Crayon partners with are situated in countries designated as being at relatively lower risk of modern slavery. Our assessment is based on our review of internationally recognized benchmarks such as the 2023 Global Slavery Index published by Walk Free. Walk Free is an international human rights group with a mission to end modern slavery.

From a business relationship perspective, our potential and existing business partners vary in the maturity of their respective labor and human rights practices, and in their use cases for software and other technologies. We therefore evaluate the potential and actual risks our business partners pose based on their individual profiles.

Addressing labor and human rights risks

Crayon's policy framework

Global policies and procedures in 2023 relevant to promoting labor and human rights include:



The Crayon Employee Integrity Handbook



The Crayon Diversity, Equity and Inclusion Statement



The Crayon Partner Integrity Policy



The Crayon Anti-Bribery and Corruption Policy

Crayon bases its policies on key international human rights standards such as the UNGPs, the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, International Labour Organization (ILO) core conventions and the United Nations Universal Declaration of Human Rights. Our global policies and procedures are supplemented with local policies and procedures which comply with local laws and regulations.

Addressing labor and human rights risks in Crayon's own operations

Crayon strictly abides by the applicable local labor laws and our own internal policies throughout our operations.

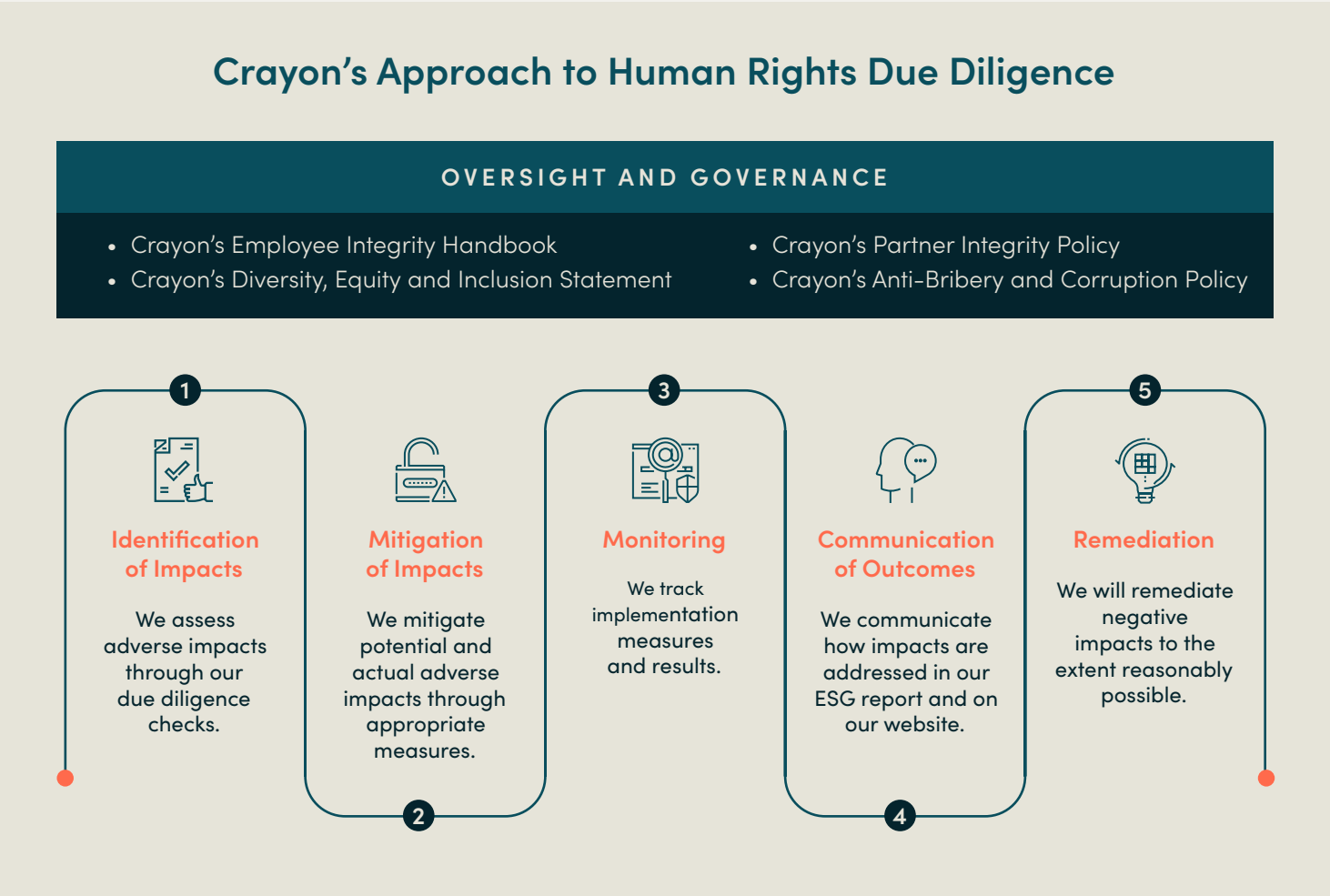
Enforced by our global network of HR representatives, our recruitment and employment systems and controls aim to avoid child labor, human trafficking, unsafe working conditions and other forms of exploitation in our workforce.

We protect our employees' right to collective bargaining and freedom of association. In 2023 collective bargaining agreements (CBAs) covered 12.84% of our employees, including some in the Nordics. The CBAs give Crayon staff a voice in strategic and operational decisions, as well as issues such as remuneration, health and safety and working hours.

Addressing labor and human rights risks in Crayon’s supply chain

Crayon’s Trust Unit administers a centralized supply chain due diligence system that assesses business partners throughout the lifecycle of our relationships with them. From a labor and human rights perspective, Crayon’s due diligence assessments encompass crucial aspects such as human rights, child labor, environmental governance, decent working conditions and diversity, equity and inclusion.

The assessments ensure our business partners’ compliance with international regulations as well as our own rigorous standards. Where necessary, we use the data gathered through the assessments to filter out and disengage from relationships that fail to meet our standards.



In 2023, Crayon’s Trust Unit led the continued expansion and refinement of our supply chain due diligence process. One of the outcomes was that we formulated policies to govern our due diligence process in 2023, providing a clearer framework for conducting thorough due diligence assessments and evaluations.

Crayon's grievance mechanisms and access to remedy

In 2023, Crayon maintained a helpline designed to receive concerns about labor and human rights, amongst other issues. The helpline was available to all Crayon employees, as well as external stakeholders such as our customers, partners and suppliers. Concerns or grievances could be raised in multiple ways, including:

In 2024, we will continue to offer a helpline but through a different service provider. Updated contact details will be communicated to our stakeholders in due course.

In addition to the helpline, Crayon employees can express their concerns about working conditions and other matters to their supervisors and by directly contacting the executive management team.

We have measures in place to protect reporters' confidentiality and shield them from retaliation or reprisal.

Following thorough and impartial investigations of reported concerns, Crayon provides relevant and appropriate remedy in situations where we may have caused or contributed to an adverse human right impact. For example, in our own operations, appropriate measures are taken to censure employees who act in breach of the law or our policies, and to remediate employees who are unjustly and negatively impacted.

Interventions in response to actual or potential risks of slavery or human trafficking in our supply chain may include enhanced due diligence, supplier engagement and drawing up corrective and preventive action plans.

Consulting our stakeholders

Representatives of Crayon’s Norwegian and UK reporting entities, as well as Crayon employees in global group support functions, were consulted in the preparation of this statement and are aware of the actions needed to mitigate labor and human rights risks.

Assessing effectiveness

Crayon periodically assesses the effectiveness of the internal systems and controls in our own operations. Similarly, we conduct annual reviews of our supply chain due diligence to ensure it remains fit for purpose. Both sets of reviews are geared towards ensuring a sustained, long-term decrease in the frequency and severity of potential or actual adverse labour and human rights impacts, including slavery, forced labor, human trafficking and poor working conditions.

Additional information on our performance and impact is available in our 2023 ESG Report.

Conclusion and approval

We made progress with respect to labor and human rights due diligence in 2023, as described in this statement and in our 2023 ESG Report. However, we recognize there remains room for improvement. We are committed to doing our part to drive positive and enduring change.

Crayon is a publicly listed company with a Board of Directors as the principal governing body. The Board of Directors of our parent company, Crayon Group Holding ASA, has reviewed and approved this statement on human rights transparency.

This statement has also been reviewed and approved by the Boards of Directors of all the entities within the Crayon group that are in the scope of the NTA and the UK MSA.

APPROVED BY

Oslo, March 20, 2024

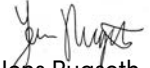

Rune Syversen
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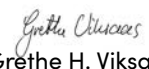

Wenche Agerup
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Jennifer Koss
(Board Member)


Jens Moberg
(Board Member)

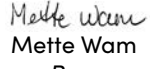

Dagfinn Ringås
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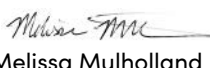

Jens Rugseth
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Lars Larhammer
(Employee Representative)


Mette Wam
(Employee Representative)


Melissa Mulholland
(CEO)



INTRODUCTION

OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAIN

IDENTIFYING POTENTIAL LABOR
AND HUMAN RIGHTS RISKS

ADDRESSING LABOR AND
HUMAN RIGHTS RISKS

CONSULTING OUR STAKEHOLDERS

ASSESSING EFFECTIVENESS

CONCLUSION AND APPROVAL

ADDITIONAL INFORMATION



Additional information



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