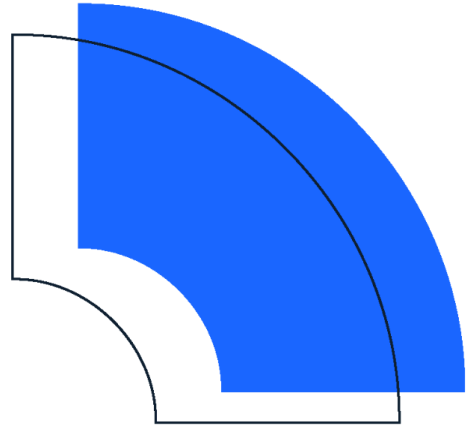


Transparency Act Report

Webstep ASA



Introduction

The purpose of this statement is to communicate Webstep's work in conducting due diligence assessments and fulfilling the requirements of the Transparency Act, in addition to providing insight into the findings and measures that have been taken.

The primary objective of the Transparency Act is to promote enterprises' respect for fundamental human rights and proper employment conditions, as well as ensuring the general public has access to information on how businesses address negative consequences for these issues.

Webstep

Webstep ASA is a Norwegian public limited liability company headquartered in Oslo, Norway. The Group has offices in Norway and Sweden and had 560 employees as of 30 June 2023. The Company's shares are listed on Oslo Stock Exchange.

Webstep's business is conducted through the Group's two subsidiaries, Webstep AS in Norway and Webstep AB in Sweden. The Group has offices in Oslo, Bergen, Stavanger, Trondheim, Kristiansand

and Haugesund (Norway), and in Stockholm, Malmö and Uppsala (Sweden). Webstep believes in the flexibility and responsiveness of a decentralised model based on strong local presence. The regional offices serve local clients with considerable autonomy, while leveraging the full expertise and capacity of Webstep.

Webstep is a provider of IT consultancy services and offers expertise to solve demanding digitalization and IT projects in the private and public sector, in a number of different industries including banking, finance and insurance, public administration, agriculture and food production, IT and telecommunication, commerce and transportation.

Webstep aims to be at the forefront of technological development and offers cutting-edge IT expertise such as digitalization, cloud migration and integration, Internet of Things (IoT), machine learning, IT security, robotics and analytics.

Webstep's policies and procedures

Webstep's commitments to human rights and decent working conditions are anchored in the Group's internal policies, procedures, and processes that all employees must acknowledge. This includes, among other things, the Group's ethical guidelines, corporate social responsibility guidelines, and guidelines for health, safety, and environment.

Webstep's ethical guidelines shall ensure a high ethical standard for personal behaviour and good business practice, outlining the expectations and obligations that each employee has in order to develop a healthy corporate culture. All employees acknowledge the ethical guidelines upon commencement in the company. This is done to ensure the correct understanding of the ethical standards the company operates under. Breach of the Group's ethical guidelines shall be reported in accordance with the procedures for reporting of unacceptable conditions.

Webstep's commitment to ensure diversity, promote equality, and prevent discrimination is integrated into the company's policies and values. The IT consulting industry is characterised by a high share of male employees. Webstep recognises its responsibility to always strive for a better gender balance, and increasing the proportion of female employees is an explicit strategic initiative for Webstep. In the Group's work on equality, a four-step model is emphasised, assessing possible risks of discrimination and potential obstacles, putting in place initiatives and measures to further promote diversity and evaluating this work to make further progress.

Webstep respects fundamental human rights both internally within its own operations and in relation to partners, customers, and others directly affected by the company's activities. Webstep adheres to the rules of the Norwegian Working Environment Act.

The Group focuses on fostering an inclusive work environment free from any form of discrimination. Webstep however recognises that there is an inherent risk that discrimination could occur in different processes within the company, including recruitment and promotions. Webstep continuously work with the internal guidelines and the Group's quality systems to acquire highly qualified diverse talent and avoid systematic discrimination.



Webstep's Corporate Social Responsibility (CSR) guidelines clarifies the principles that should underpin the company's responsible and profitable operations, aimed at creating positive economic, environmental, and social impacts. Webstep seeks to fulfil its social responsibility by achieving business profitability in a manner consistent with fundamental ethical values and with respect for individuals, the environment, and society. Value creation and social responsibility are guiding considerations in Webstep.

Webstep is committed to conducting its operations in the most environmentally efficient manner possible, with the least possible impact on the environment. The Group also aims to contribute knowledge and awareness about the importance of environmental conservation. Webstep is certified as an Eco-Lighthouse.

Webstep has a zero-tolerance policy for corruption. All employees are expected to promote a strong anti-corruption culture. The Group actively works to

prevent undesirable behaviour and empowers its employees to handle challenging situations, demands, and expectations in order to comply with ethical guidelines.

The Group has established an independent whistleblowing service where employees can report concerns related to potential legal violations or breaches of guidelines, ethics, and social responsibility, including inappropriate behaviour of any kind. There is a procedure in place for handling incoming alerts. Webstep employees should feel confident that their views on potential issues of concern are taken seriously, heard and considered, followed up, and responded to.



Due diligence assessments and risk mitigation measures

During 2023, the Group has implemented a procedure to ensure that risks related to human rights and decent working conditions are satisfactorily identified and assessed in relation to the procurement and follow-up of suppliers and subcontractors, and that the appropriate level of due diligence assessments are carried out.

In the evaluation process, suppliers of significant size have been assessed, as well as according to the industry in which the supplier operates and the type of service or delivery they provide to the group, their geographical affiliation, and Webstep's real influence on the supplier. Where the Group has strong influence, suppliers are closely followed up to obtain necessary confirmation and

documentation. Where Webstep has weaker influence, the company increasingly works through larger industry collaborations, thus supporting a collectively greater impact.

This has been assessed against publicly available overviews where there is risk geographically and industry-wise. Furthermore, the various suppliers have been assessed based on their response to the survey and whether it has been comprehensive and sufficient.

The conducted survey has not identified any actual negative impacts on fundamental human rights and decent working conditions. For larger foreign suppliers of computer equipment and electronics, in addition to licences, Webstep acknowledges that there may be an increased risk of violations. Unfortunately, the Group considers its impact on these suppliers to be limited, and therefore no action plans have been implemented. Webstep will follow up on this and assess the risk further.

Based on the nature of Webstep's business as a provider of IT consulting services, the Group assesses the risk of human rights violations in the value chain as relatively low.

Based on the Group's main objective of delivering IT services, the business initially entails limited risk for negative consequences regarding fundamental human rights and decent working conditions. Being a people company Webstep depends on employees enjoying their work, developing themselves, and constantly confirming their choice of Webstep as their preferred employer and career path. Webstep has been recognised for its work environment, and employee surveys conducted annually confirms high satisfaction among the Company's employees.

There may be a risk of use of overtime in the company, however Webstep has the necessary systems to monitor this and follow up closely. With regard to subcontractors within delivery of IT-services, Webstep considers the risk for violation of human rights and decent working conditions to be low. Additionally, the risk associated with Webstep's own employees is considered low as the group's own operations are deemed to be well managed through the aforementioned guidelines and procedures.



Closing thoughts

The Group will continue to work on improving its processes and procedures, and assess suppliers and business partners. Among other things, the Group will implement a supplier code of conduct, as well as a procurement policy for computer equipment and more with focus on lifespan of the equipment. The Group will annually perform due diligence assessments in accordance with the Transparency Act and publicly disclose a statement regarding the assessments. Webstep's due diligence assessments shall ensure respect for fundamental human rights and decent working conditions.

The Board of Directors and CEO
Webstep ASA
27 October 2023

Sign.

Kjetil Bakke Eriksen

Chair of the board

Sign.

Siw Ødegaard

Board member

Sign.

Kari Mette Toverud

Board member

Sign.

Anna Söderblom

Board member

Sign.

David Bjerkeli

Board member

Sign.

Bendik Nicolai Blindheim

Board member

Sign.

Kjell Magne Leirgulen

Board member

Sign.

Save Asmervik

Chief Executive Officer