



Transparency act report 2024

The North Alliance

This report has been prepared in accordance with the Norwegian Transparency Act (the “Transparency Act”) section 5 and summarises the policies and procedures in the North Alliance Norge Group (“NoA”) with respect to safeguarding of human rights and decent working conditions. The report also covers NoA Ignite AS, NoA Connect AS, Anorak AS and Scienta AS, which are independently subject to the Transparency Act.

About The North Alliance

The North Alliance is Scandinavia’s leading creative-tech player specialized in creating customerdriven growth. NoA’s full range of capabilities cover all levels of strategic transformation and helps connect the entire customer journey through business consulting, advertising and communications, digital products and platforms, brand experiences and data-driven marketing. Guided by a belief in the power of creative problem-solving, a can-do entrepreneurial spirit, and a collaborative culture, NoA is on a quest to make a positive impact on the future.

NoA was founded in 2014 and currently employs approx. 1200 people across Denmark, Sweden, Norway, Finland, and Poland. NoA consists of the following companies: &Co., Åkestam Holst, Anorak, Bob the Robot, North Kingdom, NoA Health, Bold, NoA Elevate, NoA Consulting, NoA Ignite, DK&A, Unfold, NoA Connect, Axenon, Scienta, Agitec, Bluebird and App Shack.

NoA’s commitment to human rights and decent working conditions

NoA works systematically with human rights, employee rights and the right to decent working conditions. The Group acknowledges all internationally recognised human and labour rights standards, and set requirements for collaboration partners, suppliers and customers. NoA’s human rights commitments are embedded in the Group’s internal policies, procedures and processes such as the diversity and equal opportunities policy, the health and safety policy, the anti-corruption policy and the ESG policy.

NoA’s employees should experience NoA as a safe workplace. NoA has zero tolerance for discrimination, bullying and harassment. This is followed up closely through employee surveys and one-to-one conversations with all employees. The Group has established a whistle-blower policy to ensure that all NoA employees and stakeholders feel safe and supported in reporting any wrongdoing or unethical behaviour that they witness or become aware of within the NoA Group. Employees or stakeholders who reports such concerns should be treated with fairness and safeguarded against any form of reprisal. All deviations are followed up. The whistle blower channel is available on NoA’s website for reporting concerns related to, but not limited to, suspected fraud, corruption, harassment, discrimination, and violations of environmental or human rights laws. The Group did not receive any reports or concerns through this channel in 2024.

The Group has implemented a transparency act procedure to ensure that risks related to the areas of human rights and decent working conditions are properly identified and addressed during the onboarding and follow-up of suppliers and sub-contractors. This procedure also ensures that an appropriate level of due diligence is carried out. The local finance teams are responsible for the compliance with this procedure.

Due diligence with respect to human rights and decent working conditions

The human rights due diligence process is embedded within each NoA company's relevant business activities, such as risk assessments, procurement practices and supplier due diligence processes. In line with the principles of the Transparency Act, the Group adopts a risk-based approach when assessing potential adverse impact on human rights and decent working conditions. This assessment considers factors such as the location and context of operations, the nature of activity, the number of people potentially affected, and the severity and probability of potential impacts.

Risk assessment

NoA operates in a low-risk environment with regard to human rights impact as the Group's operations mainly are located in the Nordic countries. These countries are highly regulated in the areas of labour rights and health and safety, with high levels of human development and low risk of violations of fundamental human rights.

The Group delivers a range of services within the areas of technology, design, marketing and communication. The services are provided by own employees in the Nordics and Poland, in addition to some suppliers and sub-contractors. The risk related to own employees is considered low, as the Group's own operations are considered to be well managed through existing systems, policies and procedures. Suppliers and sub-contractors used by the Group is also mainly located in the Nordics and the risk related to these is also considered low.

The Group has analysed purchases made by the Group in 2024, and have categorized suppliers and sub-contractors where the Group spending is above 100.000 Norwegian kroner. About 500 suppliers have been categorized into type and product category. In the analysis the suppliers have been assessed based on the risk related to human rights and decent working conditions and the Group's degree of impact on these suppliers and sub-contractors. The list of suppliers have also been compared to the list for 2023 and the largest new suppliers and subcontractors have been assessed further.

International cloud and platform providers are used in certain service deliveries. There is information indicating that some of these providers may not fully comply with human rights requirements related to fair pay, working conditions, freedom of association, and employee monitoring practices. NoA acknowledges that there might be human right breaches related to these providers, however, given NoA's size, the Group has limited impact on these providers.

Mitigation of risk

Based on the risk analysis, the Group has not identified actual adverse impacts on fundamental human rights and decent working conditions linked to its operations. However, an increased risk of breaches has been noted in relation to international cloud and platform providers. Given the Group's limited influence over these providers, no corrective action plans have been initiated at this time. The risk assessment will be revised annually, or as needed to ensure that the NoA Group remains responsive to evolving circumstances and emerging risks.

Oslo June 24, 2025

The board of directors of The North Alliance Norge AS

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Chairman

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Board member

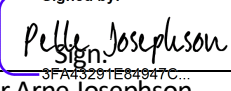
The board of directors of Anorak AS

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Managing Director

The board of directors of NoA Connect AS

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Managing Director

The board of directors of NoA Ignite AS

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Managing Director

The board of directors of Scienta AS

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