



Human Rights and Transparency Act Report 2024

Background and purpose

The Norwegian Transparency Act, effective from 1 July 2022, aims to ensure that enterprises respect fundamental human rights and maintain decent working conditions in their production and services.

Convene AS is comprised by the Norwegian Transparency Act and is therefore obliged to publish an annual human rights statement. This report applies to the reporting period 1 January to 31 December 2024 and provides information on how our organisation handles actual and potential negative impacts on fundamental human rights and decent working conditions in relation to the production of goods and provision of services.

In this report, we first describe our organisation and our value chain. Then, we account for the due diligence assessment we have conducted, including how we have identified risks, assessed severity and likelihood, implemented measures, followed up on the effectiveness, and communicated the results. Finally, we summarise our key findings and plans for further work on transparency and accountability.

For questions about this report or its contents, please contact: info@convene.no

Policy for handling requests of information

Convene's CEO bears the overall responsibility for making sure that our company operates in an ethical and legal manner. The legal department is responsible for managing and overseeing all incoming information requests.

Incoming requests will be logged and handled according to our internal procedures, and necessary information will be provided within three weeks upon receiving the request.

About Convene

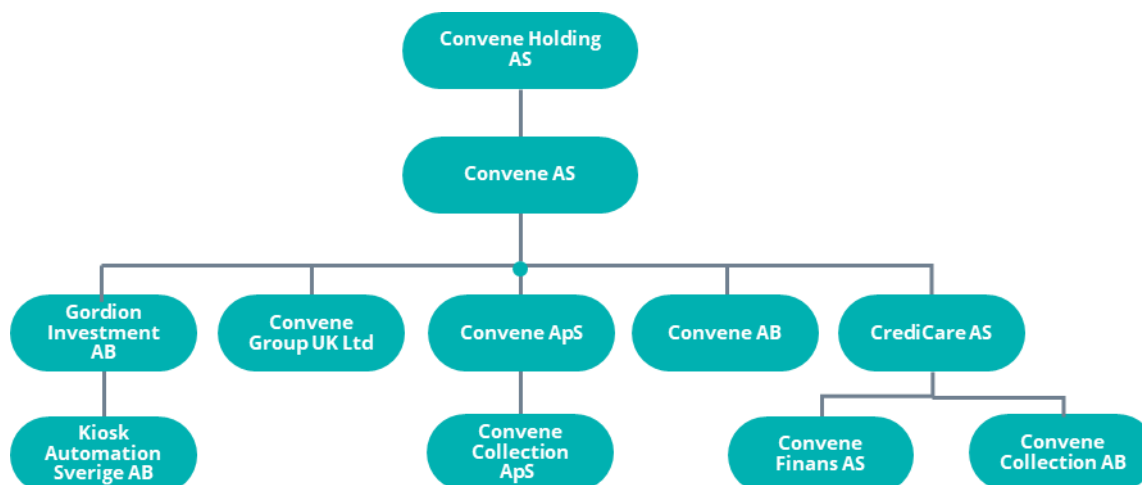
Convene is an international provider of digital self-service and payment solutions, developed to simplify everyday operations for our customers and the people they serve. Our technology helps streamline service delivery and improve the user experience across both public and private sectors.

We offer a broad range of solutions covering mobile and card payments, invoicing, collections, and financing – including systems for managing patient co-payments in the healthcare sector. While Convene has a long-standing presence in healthcare, we have over the last 30 years developed solutions for car-rentals, ferries, and harbours.

Our mission is to provide secure, user-friendly, and scalable solutions that simplify complex processes. At the core of our work is a commitment to responsible business conduct, continuous improvement, and transparency in our operations and supply chains – in line with the requirements set forth in the Norwegian Transparency Act.

COMPANY STRUCTURE

For over 30 years, the companies within Convene Group have been market leaders in self-service solutions.



The majority of our business is conducted through our Norwegian subsidiary Convene AS, which delivers payment and administrative solutions for a variety of public and private service providers with a presence in Norway, Sweden, Denmark, in the EU, and UK.

In early 2024, Convene Collection AS and CrediCare merged to strengthen our position within debt collection in Norway. We also provide debt collection services in Sweden and Denmark.

Our Swedish subsidiary, Gordion Investment AB, based in Halmstad, delivers complete self-service solutions—covering everything from hardware and software to installation, service, and support. Gordion operates across 14 European countries with a strong footprint in the car rental sector.

The Group established its UK subsidiary in April 2024 to further strengthen presence for future growth in this market.

Our policy commitments

HUMAN RIGHTS AND DECENT WORKING CONDITIONS

We are committed to respecting fundamental human rights and decent working conditions throughout our value chain. We consider this as an important responsibility towards our employees, customers, suppliers, business partners, society, and the environment. A policy framework that clearly expresses our company's commitment to respect human rights and decent working conditions and communicating it internally and externally has been established.

NON-DISCRIMINATION

We have a zero-tolerance policy for bullying, discrimination and harassment in the workplace, whether this relates to gender, ethnicity, religion, life views, disability, sexual orientation, gender identity and gender expression, or the like. The Group has introduced provisions aimed at preventing discrimination based on gender in matters such as salary, advancement and recruitment in its HR policies.

PRIVACY

Secure and compliant handling of personal information is at the core of our business. Data privacy is an area of special focus, and an internal control system consisting of governing documents, operational procedures and controls have been developed and implemented.

EMBEDDING ACCOUNTABILITY IN THE COMPANY'S POLICIES

The Group have established guidelines regarding ethical business conduct ('Code of Conduct'), in accordance with the OECD Guidelines for Multinational Enterprises. The guidelines were updated in 2023 and approved by the Board on 27.06.2024. The guidelines apply to our entire business, supply chain, and business partners and contain information such as:

- How we will act to uphold human rights and decent working conditions throughout our value chain.
- Our expectations towards our suppliers and business partners, and how we follow up on these expectations.
- Our plans for due diligence assessments, including how we identify, assess, manage, and report on actual and potential negative consequences.

Employees can access the guidelines through our internal systems. In 2025, we will continue to enhance and share information regarding the guidelines and consider adding them as attachments to contracts with suppliers and business partners.

WHISTLEBLOWING

We keep an ongoing dialogue with relevant stakeholders, such as employees, customers, suppliers, business partners, and authorities, to understand potential risks and how to address them. We are committed to listening to and addressing any complaints we receive from affected stakeholders and have established a system for receiving and handling complaints.

Our whistleblowing channel ensures the availability of anonymous and secure reporting of any misconduct. We are committed to thoroughly investigating all reports that are brought to our attention, and all cases are handled confidentially.

We have not received any reports during 2024.

Risk assessment

We conduct regular risk assessments across the Convene Group to evaluate the likelihood and severity of potential negative impacts on human rights and working conditions. This includes assessing both existing and potential suppliers and business partners.

Our approach is group-wide where vendors with a contract value above NOK 100,000 have been considered for assessment.

While our current focus is primarily at the direct supplier level, we recognize the importance of gaining visibility further down the value chain and will continue to explore ways to increase transparency at the sub-supplier level in the future.

In line with our risk-based approach, we place particular focus on suppliers located in high-risk countries, as well as those involved in the manufacturing of computer hardware, where the risk of poor working conditions and human rights breaches is generally considered to be higher.

RESULTS

The Group works several suppliers, most of these are software providers and consultants based in countries with a low risk of human rights violations, such as Norway and Ireland. In 2024 we assessed our portfolio as a whole and found insignificant changes amongst our vendors and supply chain. There has been an addition of new vendors in countries located in slightly higher risk countries.

Amongst these, we established a new supplier relationship with a vendor in a country with slightly higher risk. While we have conducted a comprehensive IT risk assessment without any negative results, a full risk assessment is still pending.

Otherwise, we have not identified any specific negative impacts on human rights or decent working conditions within our supply chain. We remain committed to regularly updating our supplier mapping and risk assessments as new information becomes available or risk profiles change.

Measures to prevent or mitigate negative consequences

Our approach is guided by the degree of impact we have, or could have, on people's rights. The closer we are to the potential or actual harm, the greater our responsibility to act, and the more robust our response must be. We focus on three key areas:

- Prevent negative impacts on human rights and decent working conditions by taking proactive steps before harm occurs.
- Mitigate existing or past impacts by limiting the extent of harm already caused.
- Stop contributing to harm by ceasing activities including, where necessary, ending business relationships that directly or indirectly cause or worsen negative outcomes.

Some examples of measures we have planned:

- Include risk assessment framework using our Risma GRC platform to better identify, map, and monitor risk factors across our supply chain — supporting our broader ESG commitments to responsible sourcing, transparency, and human rights due diligence.
- Strengthen our commitment to ethical business practices by reviewing and updating our Code of Conduct, which includes clear standards on human rights and decent working conditions. The Code has been approved by the Board and is publicly available on our website. Acceptance of the Code will be mandatory for all new suppliers, and employees will receive guidance and training during 2025 to ensure awareness and alignment.
- Consolidating our suppliers i.e. using as few suppliers as possible to have better oversight and control. This will also help us get to know our suppliers and foster long-term relationships.

Going forward

We will regularly assess the effectiveness of our measures to ensure they deliver the intended impact. Where needed, we will adjust our approach to strengthen outcomes. As part of this process, we will engage relevant stakeholders to gather input and perspectives, and we are committed to open and transparent communication about how we address potential and actual negative impacts. This includes sharing the results of our due diligence and responding to all relevant inquiries.

DEFINITIONS

To ensure a clear understanding of the terms used in this report, we provide the following definitions and clarifications:

- *Fundamental Human Rights: Fundamental human rights encompass the basic rights and freedoms to which all individuals are entitled, regardless of their nationality, race, gender, religion, or any other characteristic. These rights include, but are not limited to, the right to life, liberty, equality, non-discrimination, and freedom of expression.*
- *Decent Working Conditions: Decent working conditions refer to the fair and humane treatment of workers in all aspects of their employment. This includes factors such as fair wages, reasonable working hours, safe and healthy working conditions, freedom of association, and the elimination of forced labor and child labor.*
- *Value Chain: The value chain represents the full range of activities involved in the production and delivery of goods and services, from the sourcing of raw materials to the final consumption by customers. It encompasses various stages, such as production, distribution, marketing, and after-sales service.*
- *Due Diligence Assessment: A due diligence assessment is a systematic process of identifying, preventing, and mitigating risks and negative impacts associated with a company's operations. It involves evaluating the potential human rights and labor rights risks within the value chain, determining their severity and likelihood, and implementing measures to address them effectively.*
- *Risks: Risks refer to potential adverse events or circumstances that may result in negative impacts on fundamental human rights or decent working conditions. These risks can arise at any stage of the value chain and may be influenced by factors such as supply chain complexity, geographical location, or the nature of the industry.*
- *Severity and Likelihood: Severity refers to the potential harm or negative consequences that could arise from a particular risk. Likelihood refers to the probability or chance that the risk will occur. Assessing severity and likelihood helps prioritize and allocate resources to address the most significant risks.*
- *Measures: Measures are actions or initiatives implemented to address identified risks and prevent or mitigate negative impacts. These measures can include adopting policies and procedures, conducting supplier audits, providing training and capacity-building programs, or engaging in collaborative initiatives with stakeholders.*
- *Follow-up: Follow-up refers to the ongoing monitoring and evaluation of the effectiveness of the implemented measures. It involves tracking progress, identifying any gaps or areas for improvement, and making necessary adjustments to ensure continuous improvement in the management of human rights and working conditions.*
- *Accountability: Accountability refers to the obligation of an organization to take responsibility for its actions, policies, and impacts on society and the environment. It involves being transparent, responsive to stakeholders' concerns, and taking appropriate actions to address any adverse impacts identified.*