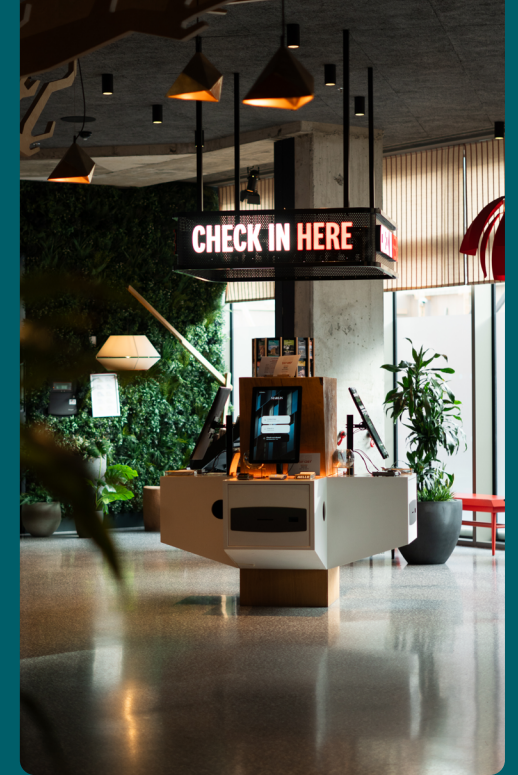


# Human Rights and Transparency Act Report 2025

convene



# Content

<b>Background and purpose</b> .....	<b>2</b>
<b>Policy for handling requests of information</b> .....	<b>2</b>
<b>About Convene</b> .....	<b>3</b>
<b>Company Structure</b> .....	<b>4</b>
<b>Our value chain</b> .....	<b>5</b>
<b>Our policy commitments</b> .....	<b>6</b>
– <i>Human rights and decent working conditions</i>	
– <i>Non-discrimination</i>	
– <i>Privacy</i>	
– <i>Ethical business conduct</i>	
– <i>Whistleblowing and complaints</i>	
<b>Due diligence: how we work</b> .....	<b>7</b>
<b>Due diligence work and key observations in 2025</b> .....	<b>9</b>
<b>Definitions</b> .....	<b>11</b>

# Background and purpose

**The Norwegian Transparency Act (Åpenhetsloven), effective from 1 July 2022, aims to ensure that enterprises respect fundamental human rights and maintain decent working conditions in connection with their own operations and throughout their supply chains.**

Convene AS is covered by the Norwegian Transparency Act and is therefore required to publish an annual statement. This report applies to the reporting period 1 January to 31 December 2025 and provides information on how our organisation works to identify, assess, prevent, and address 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. We then describe our due diligence process and the work carried out during the reporting period, including how we identify and prioritise risk, what measures we implement, how we follow up effectiveness, and how we communicate. Finally, we summarise key findings and priorities for the coming year.

**For questions about this report or requests for information under the Norwegian Transparency Act, please contact: [info@convene.no](mailto:info@convene.no).**

## **Policy for handling requests of information**

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

Requests are logged and handled according to our internal procedures. We aim to provide relevant information within three weeks of receiving the request.

# About Convene

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

Convene AS' core competence is payment and administrative solutions, originally developed for the healthcare sector. This capability has been further developed and scaled across additional industries, including veterinary services, dental care, mobility and hospitality, supporting digitalisation, automation and more efficient customer journeys and back-office processes.

The Group has a strong market position in Norway and is expanding its international presence across the Nordics, the UK and other European markets, driven by increasing demand for

self-service solutions, improved customer experiences and more efficient operating models

Mobility is a key growth area. Through Convene Mobility AB, the Group delivers solutions that enable automated fleet handling and seamless customer experiences, improving utilisation and operational efficiency for customers. In March 2025, Convene Hospitality AS became a wholly owned subsidiary, representing a new growth area through self-service solutions for hotels and travel, closely integrated with the Group's wider technology platform.

The Group's payment follow-up and debt collection activities, represented by CrediCare AS and related operations in Denmark and Sweden, are an important part of the value chain, contributing to automation, efficient collection processes and good customer experiences.

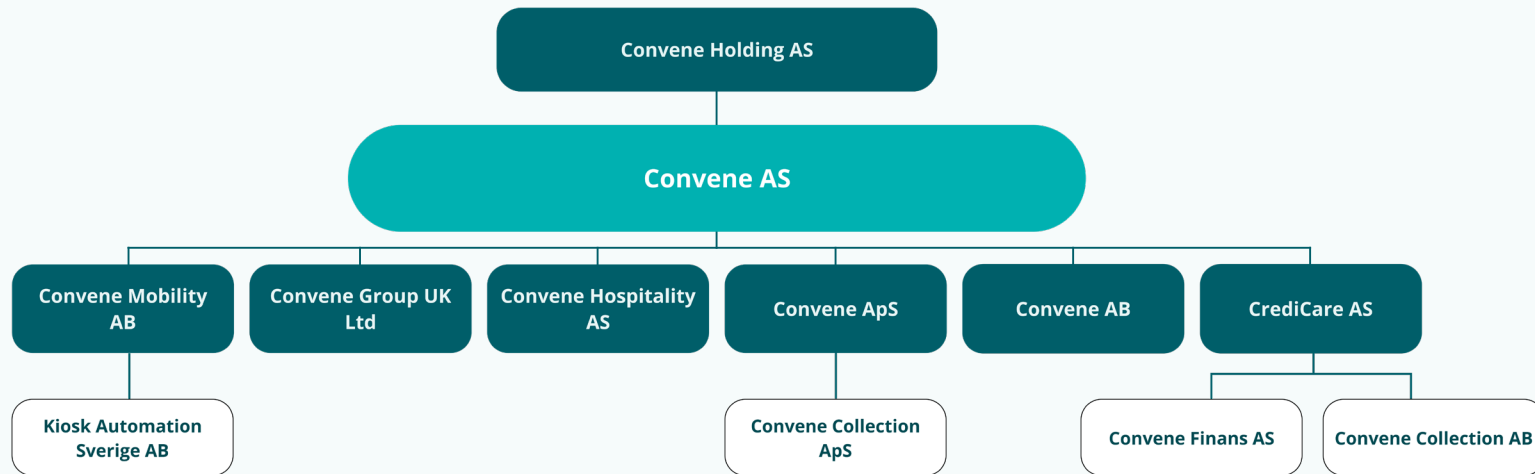
USED BY:

**100 mill+  
users**

INSTALLED SOLUTIONS IN:

**30+  
countries**

# Company structure



As of 31 December 2025, Convene AS' subsidiaries include CrediCare AS, Convene ApS, Convene Collection ApS, Convene AB, Convene Collection AB, Convene Mobility AB, Convene Group UK Limited and Convene Hospitality AS. 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 Convene having a presence in Norway, the Nordics, and other European countries. The Group provides debt collection services in Norway through CrediCare AS.

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

Convene Hospitality delivers automated hotel check-in services in Norway and across multiple other countries in Europe. The Group's UK subsidiary, Convene UK Ltd, supports our strategic focus and continued growth in the UK market.

# Our value chain

We recognise that the human rights and decent working conditions risk profile differs across our value chain. For the purposes of our due diligence work, we group key parts of our value chain into the categories below:

- **Software and IT services** (including consultants).
- **Payment and financial services components**, including invoicing and collections.
- **Hardware and components** (primarily relevant for self-service solutions and terminals).
- **Installation, service and support** (including work performed on customer sites and through partners).
- **Corporate functions and enabling services** (e.g., facility services and other indirect procurement).



Our supplier base includes many software providers and consultants located in low-risk jurisdictions, but also suppliers associated with hardware manufacturing and cross-border delivery models. We therefore apply a risk-based approach and prioritise due diligence where the likelihood and severity of harm may be higher.

## 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 an important responsibility towards employees, customers, suppliers, business partners, society, and the environment.

Our policy framework is intended to express our commitment internally and externally and to support effective implementation through procedures, guidance, and follow-up.

### NON-DISCRIMINATION

We maintain a zero-tolerance policy for bullying, discrimination, and harassment in the workplace, including discrimination related to gender, ethnicity, religion, disability, sexual orientation, gender identity or expression, and similar grounds.

### PRIVACY

Secure and compliant handling of personal information is at the core of our business. Data privacy is an area of special focus, and we maintain an internal control system with governing documents, operational procedures, and controls.

### ETHICAL BUSINESS CONDUCT (CODE OF CONDUCT)

The Group has established guidelines regarding ethical business conduct («Code of Conduct»), aligned with the OECD Guidelines for Multinational Enterprises. The Code of Conduct applies to our business, supply chain, and business partners and sets out:

- how we work to uphold human rights and decent working conditions across our value chain;
- our expectations towards suppliers and business partners and how we follow up on these expectations; and
- our approach to due diligence, including identifying, assessing, managing, and reporting on actual and potential negative impacts.

We continue to enhance internal awareness and practical use of the Code of Conduct. We also consider when and how to incorporate it into supplier and partner relationships (including by referencing it in contracts and onboarding processes), based on risk and relevance.

### WHISTLEBLOWING AND COMPLAINTS

We maintain channels for receiving and handling concerns and complaints, including anonymous reporting of misconduct. We are

committed to investigating reports brought to our attention and to handling cases confidentially.



# Due diligence: how we work

**Our due diligence work is designed to be practical, risk-based, and proportionate. It is integrated into relevant processes across the Group, including procurement, onboarding of suppliers and business partners, and contract management.**

## SCOPE AND PRIORITISATION

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

In line with our risk-based approach, we prioritise:

- suppliers located in higher-risk jurisdictions;
- suppliers involved in the manufacturing of computer hardware and related components;

- suppliers and partners where business models or delivery methods increase vulnerability risks (e.g., extensive subcontracting or on-site service work);
- situations where we have, or can reasonably be expected to have, leverage to prevent or mitigate harm.

## DUE DILIGENCE STEPS (CYCLE)

Our due diligence work typically includes the following steps:

- 1. Mapping:** identify relevant parts of our supply chain and business

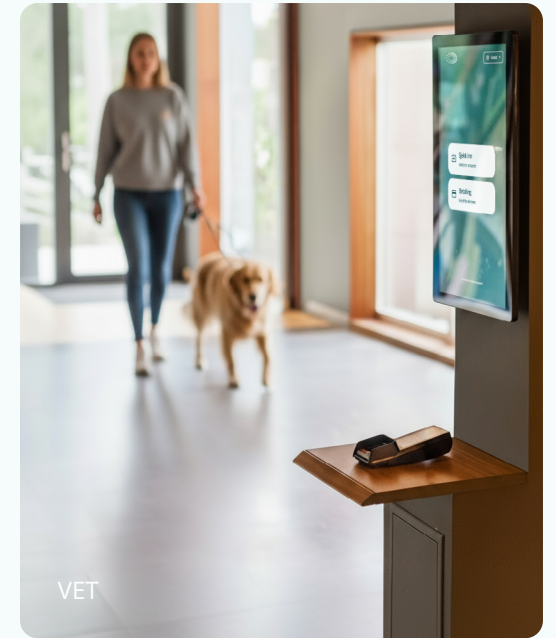
partner relationships, and determine which categories are most relevant to human rights and decent working conditions.

- 2. Screening and information gathering:** use publicly available information (including supplier websites and statements) and information obtained directly from suppliers and partners (e.g., onboarding documentation, dialogues, or questionnaires).
- 3. Risk assessment and prioritisation:** assess severity and likelihood and prioritise relationships for follow-up.

- 4. Measures and follow-up:** implement proportionate measures, which may include contractual requirements, corrective action plans, capability building, enhanced monitoring, or – where necessary – ceasing activities or ending business relationships.
- 5. Effectiveness review:** evaluate whether measures are working as intended and adjust as needed.
- 6. Communication:** document key outcomes and respond to requests for information.



HOSPITALITY



VET



MOBILITY

# Due diligence work and key observations in 2025

## Overall assessment

During the reporting period, we assessed our supplier and partner portfolio at a group level and continued our risk-based work to identify where the potential for negative impacts may be higher.

A large share of our suppliers are software providers and consultants based in low-risk jurisdictions, including Norway and Ireland. We therefore prioritise enhanced due diligence where our value chain includes higher-risk factors, including hardware-related supply chains and cross-border delivery models.

## Areas of focus

In 2025, we prioritised attention to:

- **Hardware-related supply chains:** recognising that manufacturing of computer hardware is generally considered to carry a higher risk of poor working conditions and human rights impacts.
- **Sub-supplier visibility:** acknowledging that risks may occur further down the value chain and continuing to explore practical ways to increase transparency beyond direct suppliers.
- **Supplier onboarding and contract management:** strengthening expectations and follow-up in supplier relationships based on risk and relevance.

## Identified priority risk areas (2025)

Based on the nature of our operations and value chain, we consider the following areas to be most relevant for potential risks:

- **Manufacturing and assembly of hardware and components** (e.g., working hours, wages, freedom of association, and subcontracting).
- **Rapid expansion into new countries and markets** (e.g., onboarding new suppliers/partners and relying on local subcontractors in unfamiliar markets).

We have not identified specific confirmed adverse impacts

in our supply chain during the reporting period. Where questions or uncertainties arise, we aim to address them through proportionate follow-up and, where relevant, enhanced due diligence.

## Measures to prevent or mitigate negative impacts

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

We focus on three areas:

- **Prevent** negative impacts by taking proactive steps before harm occurs.

- **Mitigate** existing or past impacts by limiting harm.
- **Stop contributing** to harm by ceasing activities, including – where necessary – ending business relationships that directly or indirectly cause or worsen negative outcomes.

## Measures implemented or strengthened during the reporting period

Depending on supplier type and risk, our measures include:

- **Governance and internal processes:** continued development of internal routines for supplier mapping, assessment, and follow-up.
- **Supplier expectations:** reinforcing expectations through onboarding and by referencing relevant requirements and standards in supplier relationships.
- **Risk management tooling:** continued work to improve structure and traceability

for supplier-related risk management, including use of GRC tooling where appropriate.

- **Dialogue and follow-up:** engaging suppliers and partners when clarifications are needed, and documenting conclusions and any agreed actions.

## Going forward (priorities for 2026)

We will continue to strengthen our work on transparency and responsible business conduct. Priorities include:

- improving practical visibility further down relevant value chains, where feasible and proportionate;
- strengthening risk-based supplier onboarding and contract management;
- continuing internal awareness and training on responsible business conduct and relevant processes;
- maintaining effective handling of information requests and transparent communication.



# 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.

convene