

Cegal AS Transparency Act

Due Diligence Report 2026

26.06.2026

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1 Management assertion

The accompanying description has been prepared according to the requirements in the Norwegian transparency act.

The due diligence has been carried out in accordance with the OECD Guidelines for Multinational Enterprises limited to human rights and decent working conditions.

The report is available on the Cegal website - [Cegal.com](https://cegal.com) Cegal AS confirms that:

The accompanying description fairly presents the description of how Cegal promotes respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and how we address adverse impacts on fundamental human rights and decent working conditions.

Sandnes, June 30th, 2026

Dagfinn Ringås
Chief Executive Officer
Cegal AS

Trym Gudmundsen
Chairman of the Board
Cegal AS

Svein Torgersen
Board member
Cegal AS

Emilia Katarzyna Probst
Board member
Cegal AS

2 Description of Cegal

A global tech powerhouse, specializing in energy.

Cegal is a technology company that delivers IT and software services to the energy sector. We combine industry knowledge, technical expertise, and efficient delivery to help customers solve complex challenges. Our goal is to make technology work in practice and support a more sustainable future.

We have around 900 employees across ten countries and are growing internationally. Our headquarters is in Stavanger, Norway, and we also have offices in Sweden, Denmark, the UK, the US, the UAE, Malaysia, Estonia, and Australia.

Cegal provides a full range of services: specialized software for the energy industry, expert IT consulting, and secure cloud solutions.

More information about Cegal is provided on www.cegal.com.

3 Introduction

The objective of the Norwegian Transparency Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure public access to information regarding how enterprises address adverse impacts and fundamental human rights and decent working conditions.

The Norwegian Transparency Act establishes requirements for enterprises to carry out due diligence of fundamental human rights and decent working conditions within their enterprise, in their supply chain, and with their business partners; and to report on the due diligence activities they have carried out.

Cegal AS including all subsidiaries will be subject to the Norwegian Transparency Act.

Human rights

Cegal respects human rights and has a clear policy in place through our Code of Conduct and ethical guidelines, which are publicly available and well known internally. We have conducted internal due diligence to assess whether our own operations, products, or services could cause or contribute to human rights violations. In addition, we have carried out external due diligence to evaluate the risk of human rights violations among our suppliers and business partners.

Based on these assessments, we categorize risks as high, medium, or low to ensure appropriate measures are taken. If a risk is identified, we implement documented actions to reduce it. Should we find that we have caused or contributed to harm, we take steps to remedy the situation. We report regularly and publicly on our human rights efforts. Our supplier contracts include clauses that allow us to verify and audit human rights practices, and we work actively to influence our suppliers to follow the same principles.

Decent working conditions

Cegal ensures that all employees have written and signed employment contracts, available in their native language. Everyone working at Cegal is free to join trade unions or other organizations of their choice and can engage in collective bargaining where legally permitted. Our management takes part in collective negotiations related to working conditions and wages. We share business information regularly and maintain a constructive dialogue with employees. We have clear measures in place to prevent child labor, forced labor, and discrimination, and we work to ensure that we are not involved in

any such practices. Health and safety are a priority, and we provide training to employees and keep records to ensure that the training is documented. Our salaries and compensation are aligned with industry standards. We have an established process for whistleblowing, including an anonymous channel that allows employees to report concerns about working conditions without fear of retaliation. We also encourage our suppliers and partners to follow the same standards for decent working conditions.

Certifications

Our approach is supported by certified management systems which are reviewed and renewed annually to ensure continuous improvement. These systems help us structure our work with quality, environmental impact, information security, and health and safety, and they contribute to our ability to identify and manage risks related to human rights and working conditions in both our own operations and the supply chain.

These include:

- ISO 9001 Quality Management System
- ISO 14001 Environmental Management System
- ISO 27001 Information Security Management System
- ISO 45001 Occupational Health and Safety Management System

Responsible business code of conduct is embedded in Cegal management system.

Cegal's management system sets the framework for how we operate responsibly and in line with laws and expectations. It ensures that our policies, procedures, and practices are documented, implemented, and regularly reviewed. Responsible business conduct is embedded into this system through key governing documents, including:

- Code of Conduct and Ethical Guidelines Policy
- Environmental, Social and Governance (ESG) Policy
- Workplace health and safety policy (WHS)
- Anti-corruption policy
- Procurement policy
- Supplier - Standard terms and conditions - ESG supplier requirements
- Annual Sustainability report

4 Due diligence self- assessment

Methodology

The due diligence is conducted regularly and follows a risk-based and proportionate approach, in line with the OECD Guidelines for Multinational Enterprises. The process involves identifying and assessing potential and actual human rights risks linked to our own operations, products, services, and business relationships.

We prioritize areas and suppliers where the risk of negative impact is higher, and we focus on in-depth assessment of a limited number of suppliers at a time. This is a conscious choice to ensure depth and quality in each assessment, rather than spreading efforts too thin.

At this stage, our initial screening is based on the full list of registered suppliers from the previous financial year. However, we are aware that our current supplier register has limitations. Any entity we pay an invoice to is automatically registered as a supplier, which means the list appears larger than it is and includes many that are not relevant for follow-up.

As part of strengthening the company's compliance with the Transparency Act and further developing its approach to responsible supplier management, the company implemented a recognized risk analytics system during the reporting period. The solution provides a more robust and data-driven

basis for decision-making in identifying and prioritizing risk within the supply chain and supports more targeted and effective follow-up of suppliers with elevated risk. By working closely with selected suppliers, we can better understand their practices, address issues effectively, and follow up on improvements over time. We acknowledge that human rights due diligence is an ongoing process. We continue to strengthen our internal systems, improve how we map risks, and take the necessary steps to prevent, mitigate, and address any adverse impacts identified.

Sources and score for assessments

Our supplier risk assessments are supported by Dun & Bradstreet (D&B) Risk Analytics, which provides a broad, data-driven foundation based on aggregated information from multiple global sources.

D&B integrates data from public and official registers, including company registries, financial filings, and legal records, to establish verified information on company structure, ownership, working condition, human rights and financial standing.

This is supplemented with financial and trade data, including payment experiences and credit-related information contributed by businesses and financial institutions, forming the basis for predictive financial risk indicators.

For compliance and integrity screening, D&B incorporates sanctions lists, politically exposed person (PEP) data, and other regulatory databases, as well as adverse media monitoring based on global news, legal records, and open-source information to identify potential misconduct or reputational risks.

The platform further leverages global third-party data providers and partners, combining information from thousands of external sources to ensure broad geographic and market coverage.

All data is structured and enriched within the D&B Data Cloud, using proprietary identifiers (D-U-N-S®), corporate linkage models, and predictive analytics, which enable consistent risk scoring and benchmarking across our supplier base.

Where applicable, the assessment is complemented by ESG and country risk data, including sustainability indicators and macroeconomic and political risk analyses, to provide additional context for geographic and sector-specific risks, in order to ensure a comprehensive assessment of risks related to human rights and working conditions.

Results of the 2026 Due Diligence

Sustainable Business Practices and Ethical Trading

Suppliers assessed	136
Suppliers in high-risk countries	2
Suppliers in medium-risk countries	3
Cegal Office Locations in high-risk countries	2

2026 Due Diligence overview

Supplier 1

Supplier 1 is a company based in a high-risk country. As this supplier has minor importance to Cegal, a system-based assessment has been carried out. The assessment concluded that there are no unacceptable risks at this time. Cegal will continue to monitor the situation.

We have still reviewed other relevant risk areas, such as the supplier's whistleblowing system, their own due diligence system in their sustainability reporting. At this stage, we consider the responses satisfactory, as the sustainability report is also verified by a third party. No further action is considered necessary currently.

Supplier 2

Supplier 2 is subject to the requirements of the Transparency Act. The supplier is located in a high-risk country and have an elevated industry risk as an oil/gas exploration service. Cegal has conducted a detailed assessment to verify compliance and found the responses satisfactory at this stage. No further action is considered necessary currently, but Cegal will continue monitoring the company.

Supplier 3

Supplier 3 operates in a medium-risk country. A detailed assessment concluded that companies in the software development sector generally present low risk of contributing directly to human rights violations or environmental harm in their direct operations. The assessment concluded that there are no unacceptable risks at this time.

We have still reviewed other relevant risk areas, such as the supplier's whistleblowing system, their own due diligence system in their sustainability reporting. At this stage, we consider the responses satisfactory, as the sustainability report is also verified by a third party. No further action is considered necessary currently.

Supplier 4

Supplier 4 operates in a medium-risk country. A detailed assessment concluded that companies in the software development sector generally present low risk of contributing directly to human rights violations or environmental harm in their direct operations. The assessment concluded that there are no unacceptable risks at this time.

We have still reviewed other relevant risk areas, such as the supplier's whistleblowing system, their own due diligence system in their sustainability reporting. At this stage, we consider the responses satisfactory, as the sustainability report is also verified by a third party. No further action is considered necessary currently.

Supplier 5

Supplier 5 operates in a medium-risk country. As this supplier operates from known European country, a system-based assessment has been carried out. The assessment concluded that there are no unacceptable risks at this time. Cegal will continue to monitor the situation.

5 Supplier due diligence

High-level risk assessment

We regularly carry out high-level assessments to identify the risk of human rights violations and poor working conditions in the supply chains relevant to our industry. As part of this, we consider factors such as political unrest or instability in supplier countries, along with other risk indicators.

Suppliers are assessed and categorized as low, medium, or high risk based on the likelihood of human rights or labor rights violations. Depending on the risk level, suppliers are subject to targeted onboarding and follow-up measures.

The due diligence covers Cegal's direct suppliers, sub-suppliers, and other business partners who provide goods or services to the company. For suppliers in higher-risk categories, especially those involved in direct purchases where there may be a risk of human rights or labor rights violations, we apply extra caution.

This includes background checks, assessments, and in some cases, audits. We conduct spot checks and audits of selected suppliers to verify compliance. Human rights and decent working conditions are an integrated part of these evaluations. Cegal's primary suppliers deliver hardware, software as a service, and facility-related services such as offices and data centers.

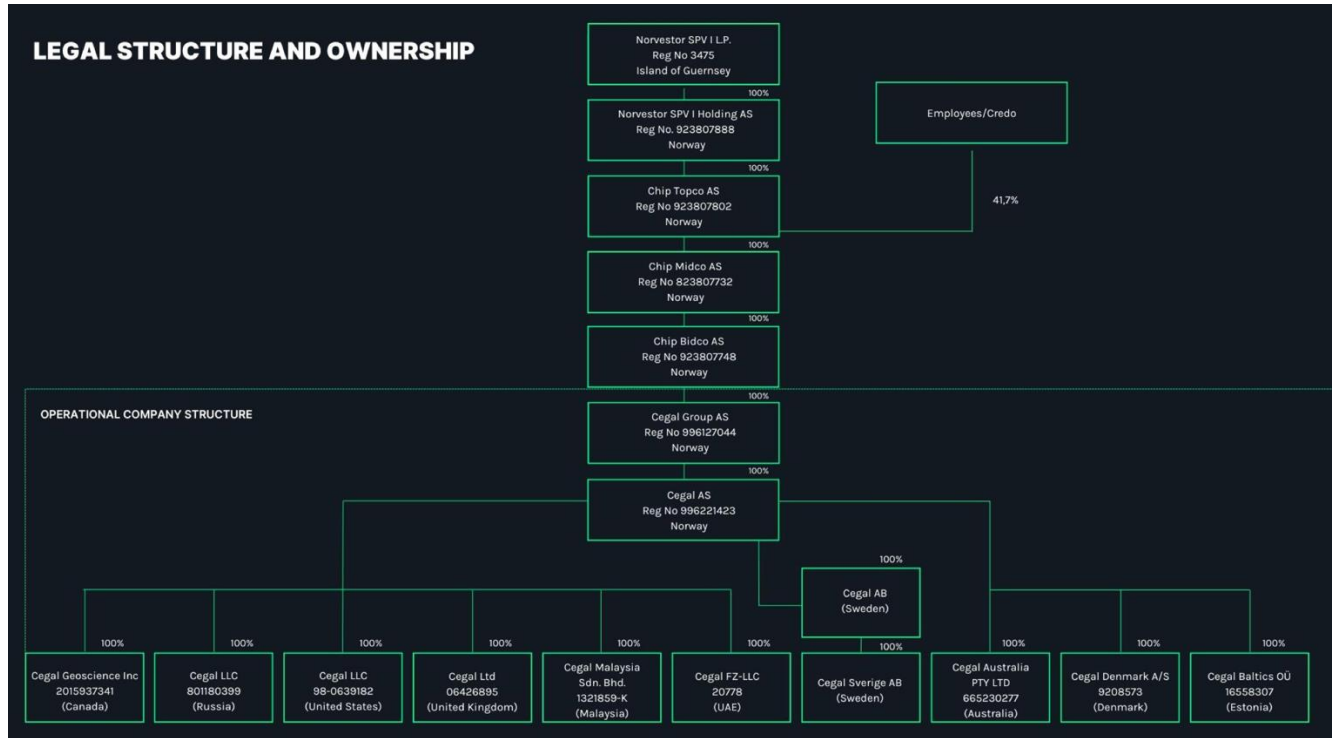
Suppliers in high-risk countries – risk assessment overview

Based on the high-level risk assessment, Cegal has identified two vendors operating in high-risk countries, and three vendors operating in medium-risk countries.

These suppliers have been subject to detailed risk assessments and conducted surveys for self-assessment. No indications of breaches related to human rights or decent working conditions have been identified to date.

6 Internal operations due diligence

Cegal's legal structure consists of a combination of investment ownership and employee participation. Norvestor SPV I Holding AS holds a majority share of 58.3%, while employees and Credo own 41.7%. The operational structure is organized under Cegal Group AS and Cegal AS, with subsidiaries in multiple regions, including Sweden, the UK, the US, Canada, Australia, and others.



General workplace health and safety

All Cegal offices conduct annual risk assessments related to workplace health, safety, and the environment. In addition, Cegal has implemented global processes for whistleblowing and for reporting deviations and incidents related to Workplace Health and Safety (WHS).

No serious workplace accidents resulting in significant injury or damage were reported during the year. The overall working environment is considered good, with ongoing efforts to identify and implement improvements. As of the end of 2025, the Group employed 830 people, up from 796 in 2024.

Cegal aims to be a workplace that does not discriminate and promotes gender equality. The Board and management are aware of societal expectations and legal requirements under the Anti-Discrimination Act, which promotes equality and prohibits discrimination based on gender, ethnicity, national origin, language, religion or belief.

We have prepared a separate statement under the Equality and Anti-Discrimination Act, which provides detailed information related to our own operations. In addition, we have published an ESRS report that covers internal governance in detail.

Both documents are available on our website under Cegal and Sustainability. All Cegal offices operate in line with the ISO 45001:2018 Occupational Health and Safety Management System.

Implemented action on offices in high-risk countries

Two of our offices is placed in high-risk countries. Cegal high standards on fundamental human rights and decent working conditions apply to all employees, and Management performs the same management training that is based on Nordic welfare principles.

The offices are regularly reviewed during the ISO 45001 audit, and the risk of any breach of fundamental human rights and decent working is regarded as low.

7 Continual monitoring and improvement

Implement suitable measures to cease, prevent, or mitigate adverse impacts based on Cegal priorities and assessments.

Cegal has instigated several preventive and mitigating measures based on the risk assessment.

1. Background checks of medium and high-risk suppliers with subsequent follow-up actions and dialogue with suppliers
2. Cegal will acquire an adequate ESG due diligence system covering the supply chain to strengthen our ability to identify, manage, and follow up on risks related to human rights and responsible business conduct.
3. Continue performing regular in-depth audits of the supply chain, minimum two who have been identified in the due diligence process.
4. Track the implementation and results of measures.

Risk-relevant information about high-risk suppliers is shared internally across relevant parts of the organization to ensure that future risk assessments are based on all available and up-to-date insights. Where appropriate, risk-related information may also be exchanged with industry peers to strengthen collective understanding and response.

In cases where human rights violations are suspected, Cegal will consider consulting with local authorities, local communities, and relevant NGOs to help assess the situation and determine appropriate action.