

Transparency Act Report

The Kanari Group (the “Company”) respects and supports fundamental human rights and conducts due diligence in accordance with §4 in the Norwegian Transparency Act. This report outlines the set of routines, practices and actions taken in compliance with the regulation set out under the Norwegian Transparency Act, which applies to the group companies Kanari AS, Kanari Group AS and Sileda HoldCo AS according to section §3.a) of the act. The Company applies these principles for all of its subsidiaries. The reporting period reviewed is for the financial year of 2022 (1 Jan 2022 to 31 Dec 2022) and for the year to date in 2023 (1 Jan 2023 – 31 May 2023).

1. Kanari Group organisation and offering

The Company is a provider of managed services, software licenses and consulting services within IT observability and monitoring to Nordic enterprise customers. Our business model is to apply deep technical and business process competence to ensure that relevant software purchased from reputed third parties are implemented and used to generate insights relevant to ensure high performance, stability and adaptability of IT ecosystems.

The Company operates in all the Nordic countries with offices and subsidiaries in Oslo, Stockholm, Copenhagen and Helsinki. Each subsidiary covers its national market and is the employer of employees located in the country. The legal structure is attached to this report as Appendix A.

The Board of Directors is conducting their oversight of the group through the parent company Kanari Group AS. The group management team is employed in Kanari AS and reports to the Board of Directors in Kanari Group AS.

2. Internal routines and work on human rights and decent working conditions

The Company is committed to ensure good working conditions and preserving all fundamental human rights for its employees, suppliers and business partners. The Company operates in an industry where competition for talent is high and where compensation and benefits are well above the national averages. Following the Covid-pandemic, the Company has put additional efforts into ensuring a good physical working environment by relocating to new and attractive offices in all countries where it operates.

The Company has a Code of Conduct which all employees shall know and adhere to. The Code of Conduct includes principles and guidelines for:

- Anti-corruption and fair business practices
- Equal opportunity and anti-discrimination
- Forced and child labour
- Freedom of association and the right to collective bargaining
- Fair employment conditions
- Environmental considerations
- Privacy and personal data protection
- Notification of censurable conditions

Employees are encouraged to report censurable conditions, meaning conditions that are in contravention of legal rules, the Code of Conduct and/or ethical norms on which there is broad

agreement in society, occurring either in the Company or in any of our business partners. Such conditions may involve, but is not limited to:

- Danger to life or health;
- Danger to climate and the environment;
- Corruption or other economic crime;
- Abuse of authority;
- Unsatisfactory working environment;
- Breach of personal data security; or
- Harassment.

The Company has a procedure for reporting and handling censurable conditions in place and employees notifying according to the procedure are protected against retaliation, meaning any unfavourable act, practice or omission that is a consequence of or a reaction to the fact that the employee has notified.

Moreover, the Company conducts annual anonymised employee surveys which includes questions regarding harassment and/or other unsatisfactory elements of the working environment.

As part of its operation, the Company makes significant purchases from third party vendors. The Company acknowledges that it has a responsibility to ensure that its business partners and vendors do not adversely impact fundamental human rights and decent working conditions. Respecting and supporting fundamental human rights and decent working conditions are an unwavering condition for conducting business with the Company. The Company's largest suppliers of software are either publicly listed or private equity owned enterprises headquartered in the US, France or the Nordics, and are subject to strong investor and regulatory oversight. The Company has local suppliers in the Nordics of operating equipment, office operations, travel and professional services.

3. Actual adverse impacts and significant risks of adverse impacts identified

The Company has reviewed areas and situations in which the Company may have contributed or may potentially contribute to adverse impacts on fundamental human rights and decent working conditions, either directly or indirectly through its supply chain.

The Company has reviewed its potential impact on all human rights, but paid particular attention to its impact on people's:

- Right to privacy
- Rights to freedom of opinion and expression
- Right to work
- Right to enjoy just and favourable conditions of work
- Right to form and join trade unions and the right to strike
- Right to a family life

The Company has through its due diligence not identified any actual adverse impact to fundamental human rights and working conditions of its business operations and conduct. The Company has neither identified areas with significant risk of adverse impact.

4. Measures and mitigating factors

The Company has established procedures and directions for management and decision makers to ensure compliance with the Transparency Act and similar regulation in the other Nordic countries.

Board of Directors receives regular risk assessment and overview of mitigating factors for potential adverse impact on human rights and decent working conditions. Based on the risk assessment, necessary mitigating actions will be effectuated by the management team and implemented across the organisation.

5. Right to information

Upon written request, any person has the right to information from an enterprise regarding how the enterprise addresses actual and potential adverse impacts pursuant to section §4 of the Norwegian Transparency Act. This includes both general information and information relating to a specific product or service offered by the enterprise.

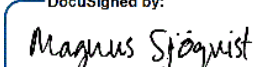
A request for information may be denied if:

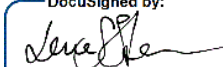
- a) the request does not provide a sufficient basis for identifying what the request concerns
- b) the request is clearly unreasonable
- c) the requested information concerns data relating to an individual's personal affairs
- d) the requested information concerns data regarding technical devices and procedures or other operational and business matters which for competitive reasons it is important to keep secret in the interests of the person whom the information concerns.

The right to information regarding actual adverse impacts on fundamental human rights with which the enterprise is familiar, applies irrespective of the limitations in the second paragraph.







Written requests for information should be directed to info@kanari.no. The Company shall provide information no later than three weeks after the request for information is received.

Oslo / Stockholm, 29 June 2023

DocuSigned by:

B65588E470C8436...
Magnus Sjöqvist
Chairperson

DocuSigned by:

DC244BA613DC4A1...
Lene Sandvoll Stern
Board member

Appendix A: Legal structure

Legal entity		Company register number
Kanari Group AS		924 848 626
Kanari Bidco AS		924 848 561
Kanari Holding AS		914 990 521
Kanari AS		915 028 411
Kanari AB		559006-4761
Kanari ApS		36688637
Kanari Oy		2683109-9

