

TRANSPARENCY ACT

2025

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1. About SmartCraft

The SmartCraft Group is a leader in digital solutions specifically tailored for craftsmen in the Nordic region and the UK. SmartCraft is listed on the Oslo Stock Exchange and currently consists of the digital solutions Cordel, Kvalitetskontroll, Elinn, EL-verdi, Bygglet, Coredination, Homerun, Locka, EL-VIS, Congrid, Clixifix and SmartCraft Spark.

The Group currently has 271 employees that serves over 13 400 customers from 15 offices in Norway, Sweden, Finland and the UK.

OUR PASSION

SmartCraft aims to streamline operations for construction companies in Norway, Sweden, Finland and the UK, especially small to medium enterprises, by freeing up time typically spent on administrative tasks. Our specialized SaaS solutions cater to both small and large companies, recognizing the commonality of processes in the field and office. Efficient processes will be essential for craftsmen and contractors to stay competitive in the future.

Our solutions, integrated into the sales process, enable customers to be more efficient and precise in their offers. With increasing regulatory requirements, our software helps in meeting health, safety, and quality control standards.

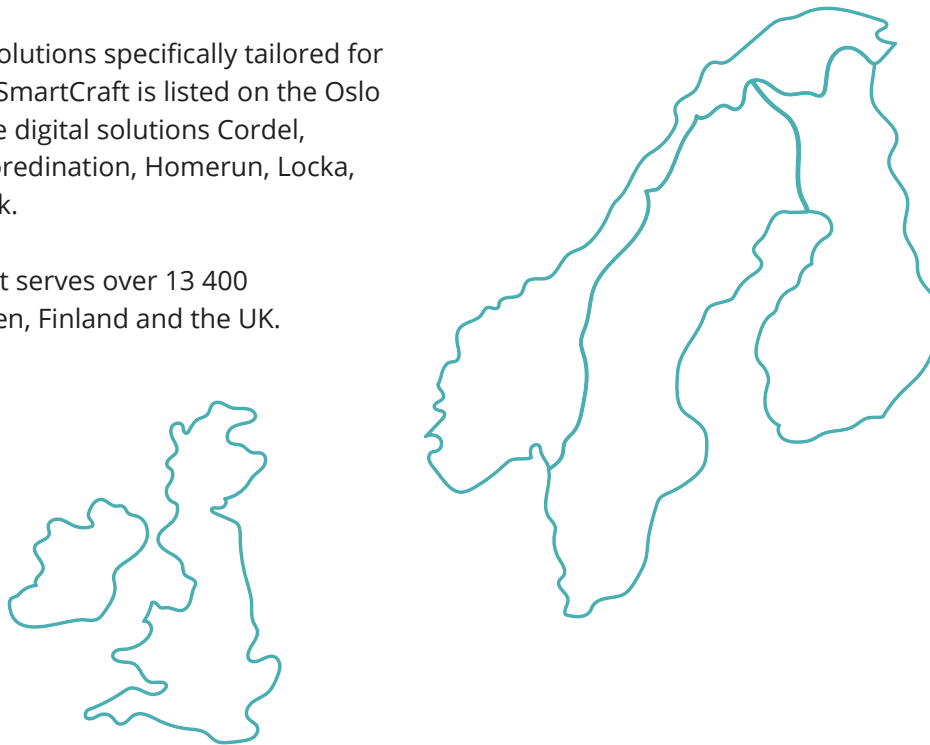
Despite the construction industry's low digitization, we anticipate rapid change, emphasizing the need to adopt digital processes to avoid being left behind.

BEST-OF-BREED SOLUTIONS

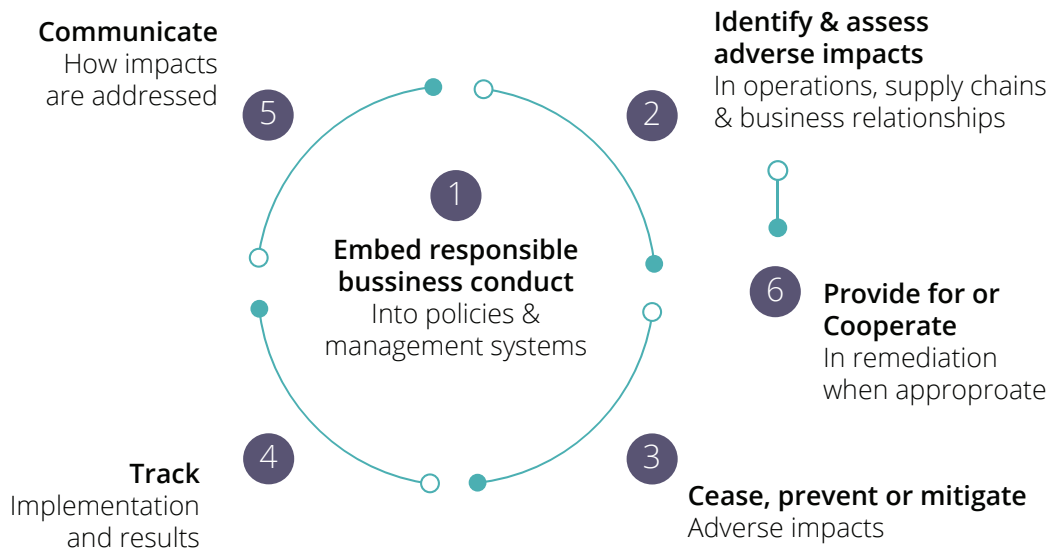
We offer tailor-made software solutions designed specifically for various niches within the construction industry. Since our establishment in 1987, we've prioritized understanding our customers' unique needs. This way we have the best solutions for construction companies with trades people like plumbers, carpenters and electricians who have different needs and workflows. We have deep knowledge and insight into the business models of our customers and collaborate cross solutions to create synergies in development and sales.

Our goal is to continually provide efficient solutions by investing about 9% of our revenue into product and technology development in 2024.

Our software is accessible seamlessly on smartphones, tablets, and desktops, enabling users to manage tasks from producing quotations to project documentation and invoicing, whether they're in the office or on-site.



2. Guidelines and routines



Several guidelines and routines have been created for handling actual and potential negative consequences for basic human rights and decent working conditions.

Any concerns about business conduct, or advice regarding the policies and practices for responsible business conduct, shall be sent to the Chief Executive Officer and taken into consideration on a continuous basis.

2.1 CODE OF CONDUCT

All employees have received and read the Code of Conduct (CoC). All new employees need to read and sign the CoC as part of their onboarding process.

The CoC has been developed and adopted to ensure that everyone associated with the company complies to the company's mission, values and high ethical standards. The CoC is a tool for self-evaluation. It is the employee's own responsibility to respect and act in compliance with the Code of Conduct.

The current CoC was approved by the Board of Directors of SmartCraft ASA on 25 May 2021 and is available on our website.

2.2 SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct (SCoC) was resolved by the Board of Directors of SmartCraft on the 19th of June 2023. The SCoC is based on the ten principles of the United Nations Global Compact concerning human rights, labor rights, environmental responsibility, and anti-corruption. The SCoC applies to all suppliers supplying material, labor, or services (hereinafter referred to as "Suppliers") to the Group. We do not want to be associated with partners lacking appropriate ethical standards. To do business with us, Suppliers must therefore commit to act in accordance with SmartCraft's ethical standards. Our Suppliers acknowledge that failure to comply may be considered as a breach of a contractual relationship and SmartCraft could immediately terminate the business relationship in case of violations of this SCoC. The Suppliers commits to have in place appropriate measures to ensure

compliance with applicable laws and regulations as well as its obligations under the SCoC.

The SCoC contributes to set the framework for the behavior we expect of all our stakeholders in our worldwide chain of supply. The SCoC shall contribute to ensure that our Suppliers adhere to high ethical standards and integrity. Integrity in this context means “the quality of being honest and just in character” and relates to attitude and behavior. SmartCraft has zero tolerance for illegal or unethical behavior and expects all Suppliers to commit to the same.

The SCoC includes the following areas of concern: people, environment, anti-money laundering, trade restrictions and sanctions, corruption and prohibited business practices, competition, reporting concerns and compliance, verification and termination.

Topics addressed related to people are human

rights, prohibition of child labor, labor rights, health and safety, and discrimination and harassment.

2.2.1 HUMAN RIGHTS

Our Suppliers shall respect human rights and always act in line with the rules and principles laid out in the UN Declaration of human rights and related conventions, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labor Organization on Fundamental Principles and Rights.

2.2.2 PROHIBITION OF CHILD LABOUR

We do not accept any form of child labor or that children below the lawful minimum age for admission to employment are engaged in our or our Suppliers’ business. If people below the age of 18 are involved, we demand special precautions to safeguard their health, security, and rights. People below the age of 18 shall not perform dangerous



or night-time labor, and their work shall not inflict damage on their education or development. SmartCraft and our Suppliers fully support, and will act in accordance with, the UN Convention on the Rights of the Child.

2.2.3 LABOUR RIGHTS, HEALTH, AND SAFETY

SmartCraft does not accept any involuntary labor and expects all our Suppliers to comply with all fundamental labor rights and applicable laws and regulations. Suppliers should ensure fair salaries, safe working conditions (including necessary supervision and protection from fire and other dangers), the right to organize, a good workplace environment, and have in place a whistleblowing procedure for the reporting concerns by employees.

2.2.4 DISCRIMINATION AND HARASSMENT

Any kind of discrimination due to gender, ethnicity, national origin, descent, skin color, language, religion, sexual orientation, family situation or disability is not accepted in SmartCraft or any of our Suppliers. All people shall at any time be treated with respect and dignity.

2.3 THE WHISTLEBLOWING POLICY

An effective whistleblowing policy is implemented in SmartCraft. Openness and transparency are essential for the workplace environment and general wellbeing of our employees. Our employees are therefore encouraged to report if they suspect or witness any unethical conduct, breach of the CoC or other policies, or applicable law, and may even have a duty to do so. All employees are therefore familiar with our whistleblowing policy so that they know how they may report concerns and what to expect once they have reported a concern.

Every concern reported by employees will be taken seriously and we will ensure to investigate and follow up on such matter in an appropriate manner and within a reasonable timeframe.


The following principles will be adhered throughout the process:

- Concerns will be followed up and handled by people that are not in any conflict of interest or otherwise involved in the matter in order to ensure sufficient independence of the assessment.
- The employee will be protected against retaliation, i.e., any disadvantageous treatment as a reaction to reporting a concern, and we will ensure that the employee has a satisfactory working environment.
- The identity of the employee reporting a concern shall, as a main rule, be treated confidentially and shall only be known to the person(s) handling the matter. People involved in the reported incident may be contacted and/or provided with information, if necessary, in an anonymized form, in the course of the investigation of the matter, and may, under certain circumstances, have a right to information under applicable data protection laws and regulations.
- The employee reporting a concern shall be informed that the report was received by the Investigation Officer as the first step.

Any feedback from the stakeholders on the design, review, operation, and improvements on these mechanisms are taken into consideration on an ongoing basis, led by the Chief Executive Officer. The effectiveness of the grievance mechanism is revised and evaluated annually, including the previous year's cases of stakeholder feedback.

2.4 PROCUREMENT POLICY

The policy applies to all SmartCraft employees involved in purchasing. It serves as a framework for fair judgment in all purchases and supplier relationships that involve contractual agreements with the company, ensuring that every procurement aligns with SmartCraft's environmental and ethical objectives. The Chief Executive Officer is primarily responsible for ensuring that SmartCraft complies with the



Procurement Policy and applicable laws and regarding purchasing processes and supplier management. Each employee is expected to proactively seek out and understand this information.

2.5 POLICY FOR HANDLING REQUESTS OF INFORMATION – THE TRANSPARENCY ACT

A routine, in accordance with the Transparency Act law, is created to secure consistent internal handling of requests. The Chief Executive Officer has the responsibility of dealing with all incoming requests and will, possibly in cooperation with other relevant colleagues, handle the request in accordance with the routine. According to the law, everyone has the right to be informed about how SmartCraft prevents and handles negative consequences on basic human rights and decent working conditions.

A step-by-step guide is described in the routine to secure consistent handling of requests.

2.6 SUBJECTS FOR THE BOARD

The Board shall determine the Group's strategy, carry out necessary control functions and ensure that the Group is satisfactorily managed and organized. The Board shall set the company's financial objectives and approve its plans and budgets. The Board is also responsible for approving and updating the organization's purpose, value statement, policies and goals related to sustainable development. Furthermore, the Board is overseeing the organization's due diligence and other processes to identify and manage the organization's impact on the economy, environment, and people. Stakeholders are encouraged to support these processes with their input during the annual general meeting.

3. Risks of negative consequences

Risks of negative consequences internally are identified through a sustainability due diligence process. This is especially important with regard to acquisitions and investment decisions. A due diligence is also conducted each year as a part of the annual strategy process. We are committed to providing for - or cooperating in - the remediation of negative impacts that the organization identifies it has caused or contributed to.

Our subsidiaries submit annual financial reports and sustainability data to the Parent Company.

3.1 PERFORMANCE

The first round of due diligence considers all active suppliers in our value chain and identifies potential environmental and social risks within those suppliers. A supplier's risk of particular importance is evaluated based on the ten principles of UN Global Compact, OECDs guidelines for responsible business conduct, and the Transparency Act law. Based on this evaluation methodology, we have categorized our suppliers into three groups: Group 1, 2 and 3. Suppliers falling into group 1 and 2 are those identified as having potential risks.

Our suppliers are spread across 24 countries. The risk categorization of countries is done according to the International Trade Union Confederation (ITUC). Our largest suppliers are mostly service providers and location-based suppliers, hence not the typical suppliers related to high risk. We have suppliers from 12 countries with medium or high risk, these include India, China, Ukraine, Pakistan, Vietnam, Israel, UK, United states, Australia, Switzerland, Bulgaria and Canada.

In 2024, there were no reported incidents of discrimination, anti-corruption or breaches of the

SCoC or CoC within SmartCraft. Suppliers operating in medium or high risk countries, or connected to other potential risk, are subject to further analysis and appropriate risk management strategies.

	2025
Percentage of suppliers that were screened using social criteria	100%
Number (percentage) of suppliers identified having significant actual or potential negative social impact	2 (0%)
Number (percentage) of suppliers identified having moderate actual or potential negative social impact	23 (2%)

3.2 PROCESS TO REMEDIATE NEGATIVE IMPACTS

Following up on the screening, we have validated that our suppliers have the necessary policies in place to ensure human rights and decent working conditions. We will also continue to evaluate suppliers based on a self-reporting form.

Specific follow-ups towards our suppliers:

- Ask for documentation that they behold the knowledge that they state they have.
- Encourage activities to follow up of their suppliers, such as self-reporting, improvement projects or inspections.
- Conduct a closer follow-up on suppliers purchasing from countries that are regarded as partly free and not free countries in the ITUC index.
- Follow up on those who do not have policies against the use of child labor and/or forced labor.

- Encourage all suppliers to have an environmental strategy with a clear action plan to improve their impact on the environment.

On a general basis, SmartCraft will direct more questions to the suppliers that do not answer important questions in a satisfactory way. Also, those that rate themselves with high risk in any part of the self-reporting form will be followed up with a request for documentation to back the

statements submitted. We will request information from suppliers trading with high-risk countries, to ensure that necessary processes and systems are in place to maintain an overview of potential risks and negative impact. The suppliers that do not answer the form need to be followed up and encouraged to submit their answers.

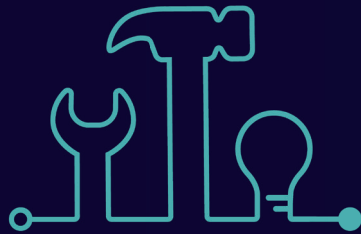
To simplify reporting incidents in our supply chain, the whistleblowing channel is publicly available.

4. Measures

To limit and prevent negative consequences, SmartCraft has taken several measures. We have set up a whistleblowing channel and a whistleblowing policy. This allows people to report on incidents that violate the CoC and SCoC. Anonymous reporting is possible.

The SCoC follows as an appendix to all supplier contracts, and a supplier declaration is signed as a part of any contract. All Suppliers are screened before any contracts are offered.

The Procurement Policy ensures that SmartCraft employees make purchasing decisions in line with our ethical and environmental standards. These measures will reduce the risk of negative consequences and promote Suppliers' focus on human rights and decent working conditions and halt any activities that have negative impact.



SmartCraft