



Transparency Act Statement

Puzzel AS

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1. Transparency Act Statement 2025

In compliance with the Norwegian Transparency Act, this statement outlines Puzzel AS's approach to ensuring human rights and fair working conditions across our entire business network. It reflects our dedication to transparency and responsibility by summarizing our governance framework, policies, and procedures. We conduct thorough due diligence assessments to identify risks and implement effective mitigation strategies. Annually, we disclose our risk assessment results and actions on our website, fulfilling legal requirements while demonstrating our commitment to ethical practices and stakeholder welfare.

2. General Information

2.1. About Puzzel AS

Puzzel AS ("the Company") is Norway's leading provider of integrated contact centre solutions, offering a comprehensive customer experience (CX) ecosystem that seamlessly combines AI-driven automation with human interaction. By unifying communication channels, we enable our customers to deliver exceptional customer service while streamlining operations and improving efficiency.

Headquartered in Hølsfyr, Oslo, Puzzel AS operates subsidiaries in Sweden, Denmark, Finland, the United Kingdom, the Netherlands, and Bulgaria. The Company itself is a subsidiary of the Jigsaw Group ("the Group"), also based in Hølsfyr.

Puzzel AS is responsible for the development and maintenance of the Group's core Contact Centre product. As the primary intellectual property (IP) owner, the Company holds all associated rights, including proprietary know-how and technical expertise, and oversees the continuous maintenance and enhancement of the product.

2.2. Commitment to human rights and decent working conditions

Our business, alongside the products and services we offer, inherently poses a very low risk of contributing to adverse impacts on fundamental human rights and fair working conditions. Puzzel AS is dedicated to upholding human rights and promoting decent working conditions throughout all of its

operations and supply chains. This commitment is embedded in our corporate values and reflected in our updated policies.

We ensure our approach aligns with the relevant requirements set out in the Transparency Act (åbenhetsloven § 3), and we are committed to performing due diligence in accordance with the OECD Guidelines for Multinational Enterprises. Furthermore, we report on these efforts as required by § 5 of the Transparency Act. This commitment extends to the ongoing evaluation and management of human rights risks across all aspects of our business activities.

3. Governance

3.1. Responsibilities

At Puzzel AS, responsibility for human rights and working conditions is distributed across the organisation, with individual departments managing the procurement process in line with our established policies. The executive team, including the C-suite, regularly reviews these policies and oversees overall compliance. They ensure that our policies remain relevant and effective in upholding Puzzel AS's ethical standards and business integrity.

3.2. Policies and governing documents

The Company has put in place a range of policies and governing documents to support human rights and fair working conditions. We devote significant resources to ensuring compliance with both regulatory requirements and our internal policies. Central to these efforts is Puzzel's Ethics and Code of Conduct, which sets out our business practices and behavioural standards. This vital document serves as a comprehensive guide for all employees and stakeholders within the Puzzel group. It is essential that every member of our team adheres to these standards and makes every effort to avoid any appearance of improper conduct.

In addition to the Ethics and Code of Conduct, Puzzel AS has implemented various other policies designed to protect and support human rights, combat corruption and discrimination, and eliminate all forms of forced labour. Our commitment to these principles is also reflected in our alignment with UN Global Compact, as well as other specific sustainability initiatives.

The following are additional policies and statements that apply to both our operations and supply chain:

- Ethics and Code of Conduct
- Equality Statement
- Health and Safety Policy
- Human rights Policy
- Sustainability Statement
- Recruitment and Selection Policy
- Whistleblowing policy
- Supplier Code of Conduct
- Anti-slavery and Human Trafficking Policy

3.3. Whistleblowing system

At Puzzel AS, we firmly uphold the right of every employee to report any conditions they consider unacceptable or unsafe, in a secure and confidential manner. This is supported by our comprehensive Whistleblowing System, supported by our Whistleblowing Policy. The system is designed to encourage employees and other stakeholders to raise serious concerns about any aspects of our working environment, while also providing clarity on how we address both actual and potential negative consequences.

We have established robust procedures to ensure that all reports are thoroughly investigated and dealt with appropriately. In 2024, no critical concerns were raised through the whistleblowing function. However, we remain committed to ongoing vigilance and responsiveness to ensure the continued credibility and effectiveness of the system.

4. Due Diligence Process

Puzzel AS conducts thorough due diligence to identify and mitigate risks related to human rights and working conditions. This includes regular risk assessments and the implementation of corrective actions when necessary. Our due diligence efforts are ongoing, aiming to proactively address potential risks within our operations and supply chains.

In terms of risk mitigation, Puzzel AS employs a risk-based approach, tailored to the perceived risk level of each supplier and business partner. Generally,

our vendors are based in Scandinavia or Europe, thus are subject to the same strict requirements regarding fundamental human rights and decent working conditions. Furthermore, Puzzel AS sources goods and services from industries that are not typically associated with significant challenges in this area. As a result, the overall risk for the Company in relation to adverse impacts on human rights and working conditions through our supply chain or business partners is assessed to be very low.

The Company has identified key risk parameters for potential negative impacts on human rights and working conditions, namely industry, geographical region, and volume of purchases. These parameters are assessed using a scale from 1 to 5, with the most influential factors being the region and industry of the supplier.

Risk grading is based on a variety of information sources, including reports on working conditions, public human rights assessments, and an understanding of regulatory requirements in key locations. Additionally, as part of the risk assessment process, a qualitative review of various purchases has been conducted to ensure these are well understood.

For the 2024 Transparency Act report, the Company has reviewed and updated the risk parameters and categories to better align with the underlying risks within each category. While this update does not change previous risk assessments or conclusions, it provides a more accurate reflection of the actual risks. As a result of this update, vendors generally receive a higher risk score, thereby establishing a lower threshold for performing additional steps to ensure compliance with decent working conditions and fundamental human rights.

4.1. Main Findings

4.1.1 Own Operations

At Puzzel AS, our workforce is the cornerstone of all our operations. We firmly believe that our success is deeply rooted in the well-being and rights of our employees.

We take great pride in our talented and diverse team of over 270 employees. Our commitment to upholding decent working conditions, respecting human rights, and fostering a culture of respect and empowerment within our workforce remains a top priority.

- **Health, and Safety occupational risks**

As a software company operating exclusively within office environments, our occupational health and safety risks are inherently low. Nevertheless, we adopt a proactive approach to managing potential hazards, ensuring the well-being of all employees and workers under our operational control.

Puzzel AS regularly identifies and assesses work-related hazards through routine office inspections, ensuring that our workspaces are safe and favourable to employee health. To maintain the quality of these processes, trained personnel oversee hazard identification and risk assessment activities. Periodic reviews and updates to our safety protocols allow us to continually improve our occupational health and safety management system.

Employees are encouraged to report any workplace hazards or unsafe conditions through direct communication with their supervisors or safety representatives. Puzzel AS has established clear reporting mechanisms to ensure such concerns are addressed promptly and confidentially.

Although incidents are rare in our office-based operations, Puzzel AS has a structured process in place for investigating any work-related incidents. This includes identifying root causes, assessing associated hazards, and implementing corrective actions based on the hierarchy of controls. Insights gained from these investigations help refine our safety protocols and strengthen our occupational health and safety management system.

Through these measures, Puzzel AS demonstrates its commitment to maintaining a safe, healthy, and supportive workplace, ensuring that all employees can work with confidence and security.

- **Employee well-being**

Puzzel AS recognises the profound impact that responsible employment practices have on the economy, environment, and society, including the protection of human rights. In response, the company is deeply committed to fostering a work environment that is safe, inclusive, and supportive for all employees.

Through policies promoting employee well-being, diversity, equity, inclusion, and professional development, the company enhances job security, ensures fair wages, and encourages workforce engagement. These efforts

contribute to a healthy and motivated workplace, with a particular focus on creating opportunities for personal and career growth.

- **Diversity and Equal opportunity**

Diversity, equity, and inclusion are central to our business and mission. At Puzzel AS, we aim to cultivate an inclusive culture where every employee feels valued and is provided equal opportunities to realise their full potential. Through this agenda, we actively contribute to gender equality by ensuring all employees have equal opportunities for professional growth and personal achievement, thereby supporting our company's overall success. Additionally, we contribute to decent work conditions and economic growth by fostering a positive work environment and offering high-quality jobs.

We consider our employees to be our greatest asset. At Puzzel AS, we are committed to ensuring a culture of diversity, equity, inclusion, and belonging, while promoting continuous development. A key factor in enhancing diversity within our company has been the appointment of an in-house Talent Manager dedicated to refining our recruitment and selection processes. In parallel, we have developed a comprehensive recruitment policy that establishes clear protocols to ensure our hiring practices not only uphold the highest standards of quality but also actively promote diversity within our workforce.

As a company in the software industry, Puzzel AS acknowledges the challenges of improving gender diversity. While this remains an ongoing effort, we have seen positive progress in our hiring practices. Notably, we have observed a clear increase in the percentage of women being hired, reflecting our commitment to enhancing gender diversity in the workforce.

4.1.2 Supply Chain

As company aligned with the UN Global Compact, Puzzel AS is firmly committed to reducing its environmental impact, defending and promoting human rights, and combating corruption, discrimination, and all forms of forced labour. As such, it is crucial that all our suppliers adhere to the same high standards.

- **Supplier Code of Conduct**

To ensure that our suppliers meet the necessary environmental and social standards, we have introduced a Supplier Code of Conduct. This Code outlines clear expectations for managing sustainability risks and impacts,

requiring all suppliers to adopt a precautionary approach to business operations while adhering to social responsibility standards and ethical requirements.

Puzzel AS expects all suppliers to guarantee safe working conditions in their operations and supply chains, treat all workers with respect and dignity, and conduct operations that are environmentally responsible and ethically sound. Suppliers are also required to comply with legal obligations and align their business practices with internationally recognised standards of business ethics.

- **Risk Assessment**

At Puzzel AS, we have conducted a comprehensive risk assessment across our entire supply chain to evaluate potential risks related to fundamental human rights and decent working conditions.

Our findings indicate that the vast majority of our suppliers fall into the low-risk category. This is largely due to our sourcing strategy, which focuses on goods and services from Scandinavia and Europe regions with strong legal frameworks governing human rights and labour standards. Additionally, our emphasis on procuring IT goods, services, and professional services further contributes to the predominance of low-risk suppliers. Our initial assessment found no cases of violations or instances of high or very high risk of non-compliance with the Transparency Act.

The risk assessment was performed by categorising the risk levels of our suppliers by using a scoring system: low (score 1), medium (score 2), high (scores 3–4), and very high (score 5).

A total of 98.3% of our suppliers were classified as low risk, with a score of 1. This reflects their presence in low-risk regions and industries. The remaining 1.7% of our suppliers fall into the medium-risk category.

This latter group consists of just four suppliers, three of whom are based in Scandinavia. Their slightly higher risk classification is due to the nature of their industries, such as construction and agriculture, rather than their geographical location. The fourth supplier has its HQ in Asia, where regional differences contribute to a slightly elevated risk. However, this supplier operates in a low-risk industry, and our financial transactions with them are small, further minimising any potential concerns. We have conducted a

more detailed assessment of these four cases and have found no significant concerns.

Risk Category	Number of vendors
Low	228
Medium	4
High	0
Very High	0

5. Mitigating Measures

- In 2024, the Company reviewed its procurement guidelines, policies, and procedures to ensure alignment with the requirements of the Transparency Act.
- Our internal guidelines stipulate that all new vendors must sign or confirm compliance with our Supplier Code of Conduct (SCoC), which reflects the Puzzel's commitment to ethical procurement, human rights, and decent working conditions. A copy of the SCoC is always available on our website, along with our Human Rights Policy.
- As part of our policy, Puzzel AS will not engage with suppliers that pose a high or very high risk of actual or potential adverse impacts on fundamental human rights and decent working conditions. For vendors with an initial medium-risk score, we conduct a thorough vendor due diligence or business review. The results of this review are assessed by the Group Leadership Team, who will decide whether to continue or terminate the relationship with the vendor. Based on the initial risk assessment and the nature of our operations, Puzzel AS has determined that no further action is necessary for low-risk vendors. We also provide a channel for anonymous reporting of any potential violations or questionable conduct via privacy@Puzzel.com. No instances were reported during 2024.
- Puzzel AS conducts an annual review of suppliers to assess whether there are any actual or potential adverse impacts on human rights or decent working conditions. To strengthen our processes and controls

within the supply chain, Puzzel AS implemented a new procurement system in 2024, embedding the initial risk assessment of suppliers into the supplier onboarding process.

- In 2025 we will closely monitor the evolving situation in the United States, recognizing the potential impact of the new administration on human rights and decent working conditions. Although the percentage of our suppliers based in the U.S. is relatively low, we will apply stricter evaluation criteria to those companies if the situation requires it. This approach aligns with our commitment to maintaining our core values and ensuring the highest level of transparency.
- The Company will continue to monitor, update, and refine its risk assessment and procedures regularly to identify, prevent, and mitigate any potential adverse impacts on human rights and decent working conditions that our operations may cause or contribute to.

Oslo, March 2025.

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