

Transparency Act Report

Puzzel AS



Description of the company and operations

Puzzel AS (the “Company”) is Norway’s leading provider of integrated contact centre solutions including adjacent offerings such as Work Force Management Solutions and Digital Engagement solutions. The company is located at Helsefy, Oslo. The company has subsidiaries in Sweden, Denmark, Finland, United Kingdom and Bulgaria and the company is a subsidiary of the Jigsaw Group located at Helsefy (the “Group”).

The Company falls within the relevant thresholds under the Transparency Act (åpenhetsloven § 3) and is obligated to carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises and to report on this according to § 5 of the Transparency Act.

Product development and maintenance of the main Contact Centre product is performed by the Company. The Company is the primary IP owner in the Group and owns the intellectual property rights associated with the Contact Centre product, including all know-how and all technical knowledge, and performs all maintenance of the product. Our business, our products and services by their inherent nature have a low risk of contributing to actual and potential adverse impacts on fundamental human rights and decent working conditions.

Procurement throughout the Group is governed by our Code of Conduct, the Procurement Policy for the Group, Supplier Code of Conduct and our Human Rights Policy. The Procurement process in line with our policies is managed by the individual departments. These policies require employees to respect and obey laws, rules and regulations where we operate, and not to engage in unethical or illegal business practices. Supplier selection must be done based on required performance (including safety), cost, and quality.

Overview of vendors

The main vendors the Company uses in its operations can be divided into following categories:

- Telecoms, Software and IT
- Professional, Scientific and Technical Services
- Professional services from Group companies

The Company purchased goods and services from vendors in the categories above for approx. NOK 344m in 2022. This constitutes approx. 97% of total purchases in 2023. Of the total purchases in 2023, approx. 60% are acquired from vendors located in Scandinavia, 34% in other parts of Europe and 6% in North America. Included in these figures is the procurement of professional services in relation to maintenance, development, sales and back-office functions from its subsidiaries.

Risk assessment

In general, our vendors are primarily located in Scandinavia or Europe and are subject to the same or similar strict requirements with respect to fundamental human rights and decent working conditions. Further, the Company purchases goods and services from vendors in industries that are not typically identified with challenges in this area. The overall risk for the Company in relation to adverse impacts on fundamental human rights and decent working conditions through our supply chain or business partners is assessed to be low.

The Company has initially identified risk parameters for potential negative impact on human rights and decent working conditions. The key risk parameters identified are industry, geographical region, and volume of purchases.

The Company uses a scale from 1 to 5 to assess risk, with the most influential parameters considered to be region and industry. The risk grading in the parameters is dependent upon various sources of information on work conditions, public reports on human rights, understanding of regulatory requirements in key locations etc. In addition, as part of the risk assessment, a qualitative review was made of various purchases to ensure these are properly understood.

As part of the Transparency Act report for 2023, the Company has reviewed and updated the risk parameters and categories to better align with the underlying risks within the categories. The change does not impact prior risk assessment and conclusions but better reflects the underlying risks. The consequence of the update is that vendors in general will receive a higher risk score and thus a lower threshold for performing additional steps to ensure compliance with decent working conditions and basic human rights.

Dependent on the initial risk score, vendors have been categorized into risk categories low (score 1-3), medium (score 3-4) high (score 4-5) and very high (5) with the results below.

Risk category	Number of vendors
Low	231
Medium	1
High	0
Very high	0

In the initial risk assessment, most vendors are categorized as low risk vendors. This reflects that the company primarily procures goods and services in Scandinavia and Europe which have strict laws and regulations regarding human rights and decent working conditions. Further, the number of low-risk vendors reflects that the company mainly procures IT goods & services as well as professional services. No actual violations or high / very high risks for violation of the Transparency Act were identified through the initial risk assessment.

Implemented and planned implemented measures related procurement

In 2023, the Company reviewed its guidelines, policies, and procedures for procurement in conjunction with implementing the requirements within the Transparency Act.

Our internal guidelines require all new vendors to sign or confirm compliance with our Supplier Code of Conduct (“SCC”) which reflects the Company’s position and attitude towards ethical procurement, human rights and decent working conditions. The SCC requires, among other things, our vendors and their subcontractors to uphold basic human rights and decent working conditions. A copy of the SCC is at any given time available on <https://www.puzzel.com/neighbourhood/trust-centre/> together with our Human Rights Policy.

As a policy, the Company will not engage with suppliers that would constitute a high or very high risk for actual and potential adverse impacts on fundamental human rights and decent working conditions. For vendors which are considered to have an initial risk score equivalent to medium risk, vendor due diligence or business review is undertaken. The outcome of this process will be reviewed by the Group Leadership Team, which will make the decision whether to terminate or continue with the vendor. Based on the initial risk assessment and the nature and context of our operations, the Company has determined that no further actions are required for low-risk vendors. The Company has also enabled anonymous reporting of possible violations or otherwise questionable behavior through privacy@puzzel.com. No instances were reported during 2023.

The Company regularly, and at a minimum annually, conducts a review of suppliers to assess whether there are any actual, or risks of, adverse impacts on human rights or decent working conditions. In the assessment for 2023, no new vendors with a risk score of medium or above were identified. One vendor with medium risk, primarily due to jurisdiction, was identified in the 2022 reporting, and the Company has been terminating the relationship in 2023. The Company procured approximately NOK 0.5m from this vendor during the year.

To enhance the Company’s processes and controls within our supply chain and business partners, in 2024 the Company implemented a new procurement system and is embedding the initial risk assessment of suppliers within the supplier onboarding process in this system.

The Company will continue to monitor, update and refine our risk assessment and procedures on a regular basis to identify, prevent and mitigate any potential or adverse impacts on human rights and decent working conditions that our operations could cause or contribute towards.

Oslo, 22. April 2024

Michael Edward Wilkinson

Frederic LAZIOU

Michael Edward Wilkinson
Chairman of the Board

Frederic Corentin Laziou
CEO / member of the Board





Peter Boris Spasov
member of the Board

Anzhela Sakharova
member of the Board

Paal Kongshaug
member of the Board



Verification

Transaction 09222115557515755957

Document

Puzzel AS Transparency Act statement 2023_for signing

Main document

3 pages

Initiated on 2024-04-22 12:05:18 CEST (+0200) by Roar Nilsen (RN)

Finalised on 2024-04-23 10:08:53 CEST (+0200)

Initiator

Roar Nilsen (RN)

Puzzel AS

roar.nilsen@puzzel.com

+4794836086

Signatories

Frederic Corentin Laziou (FCL)

frederic.laziou@puzzel.com

Frederic LAZIOU

Signed 2024-04-22 12:16:59 CEST (+0200)

Peter Boris Spasov (PBS)

pspasov@marlinequity.com



Signed 2024-04-22 17:26:11 CEST (+0200)

Michael Edward Wilkinson (MEW)

mwilkinson@marlinequity.com

Michael Edward Wilkinson

Signed 2024-04-23 10:08:53 CEST (+0200)

Paal Kongshaug (PK)

paal.kongshaug@puzzel.com



Signed 2024-04-22 20:10:20 CEST (+0200)

Anzhela Sakharova (AS)

angela.sakharova@puzzel.com



Signed 2024-04-22 15:32:20 CEST (+0200)



Verification

Transaction 09222115557515755957

This verification was issued by Scrive. Information in italics has been safely verified by Scrive. For more information/evidence about this document see the concealed attachments. Use a PDF-reader such as Adobe Reader that can show concealed attachments to view the attachments. Please observe that if the document is printed, the integrity of such printed copy cannot be verified as per the below and that a basic print-out lacks the contents of the concealed attachments. The digital signature (electronic seal) ensures that the integrity of this document, including the concealed attachments, can be proven mathematically and independently of Scrive. For your convenience Scrive also provides a service that enables you to automatically verify the document's integrity at: <https://scrive.com/verify>

