



Due diligence assessment report
5 § Transparency Act

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1. Purpose

The purpose of this document is to fulfil Sariba's ("Sariba and all daughter companies") obligation to report due diligence under the Transparency Act. The document will be updated and published annually by June 30. It will also be updated in the event of significant changes in the company's risk assessments.

2. Sariba`s responsibilities due to the Transparency Act

The Transparency Act entered into force on July 1, 2022. The purpose of the 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 to ensure public access to information on how enterprises deal with negative consequences for fundamental human rights and decent working conditions.

The Transparency Act requires large enterprises to conduct due diligence in line with the OECD Guidelines for Multinational Enterprises. This involves the following activities:

1. Entrench accountability in the company's policies and management systems.
2. Identify and assess actual and potential negative impacts on fundamental human rights and decent working conditions that the business has either caused or contributed to, or that are directly related to the company's business activities, products or services through supply chains or business partners.
3. Take appropriate measures to stop, prevent, or mitigate adverse impacts based on the entity's priorities and assessments.
4. Monitor the implementation and results of measures.
5. Communicate with affected stakeholders and licensees about how adverse impacts are addressed.
6. Provide for or cooperate in recovery and replacement where required.

Due diligence assessments shall be carried out regularly and proportionate to the size of the business, the nature of the business, the context within which the business takes place, and the severity and likelihood of negative consequences for fundamental human rights and decent working conditions.

In line with the purpose of promoting greater transparency about risks to human rights and decent working conditions, enterprises are required to publish a report on due diligence. The due diligence report must at least contain:

1. A general description of the company's organization, area of operation, policies and routines for dealing with actual and potential negative consequences for fundamental human rights and decent working conditions.
2. Information about actual negative consequences and significant risk of negative consequences that the business has uncovered through its due diligence assessments.
3. Information about measures that the enterprise has implemented or plans to implement to stop actual negative consequences or limit material risk of negative consequences, and the result or expected results of these measures.

3. Sariba's business and organisation

Sariba is a consultancy firm that started in 2000 and provides products, services and advice within HR Strategy, HR Processes and HR Technology. Today, 99 people are employed in the Sariba group

The Sariba group is represented in Norway, Sweden and Spain, including following legal companies:

- Sariba Consulting AS
- SAREC Lønn AS
- Sariba Consulting SL
- Sariba Consulting AB

Sariba's organizational structure



4. Requirements related to the Transparency Act

Due to Sariba's Code of Conduct (signed by the Board on December 13, 2022) Sariba is obligated to conduct its business with integrity, respecting the laws, cultures, dignity and rights of individuals. Sariba does not allow discrimination where an individual or a group of individuals are considered less eligible based on their national origin, union membership, ethnicity, race, religion, age, gender (including pregnancy), sexual orientation, gender identity, marital status, mental or physical ability, etc., without this list being considered exhaustive. Sariba is committed to paying employees fairly for the work they perform, regardless of personal beliefs or any individual characteristics. Individual compensation for an employee, consultant or contractor, only varies based on position, performance and market rates. All compensation shall meet requirements of national minimum wage. Sariba recognizes and respects the right to freedom of association and the right to collective bargaining.

Sariba has an established and communicated whistleblowing process in place. Information related to whistleblowing in Sariba is available in the organization's personnel handbook.

Sariba requires that suppliers and other business partners respects and follow the standards described in Sariba's Code of Conduct. In addition to national laws and regulations suppliers and other business partners should also comply with the rules and principles set out in the *UN's Guiding Principles for Business and Human Rights*, the *ILO Declaration on Fundamental Principles and Rights at Work* and the *OECD guidelines for multinational enterprises*.

If Sariba finds that there is a risk of a violation of basic human rights and decent working conditions in the supply chain, Sariba together with the supplier will formulate proposals for measures to stop, reduce or prevent the negative impact or damage.

For more information related to Sariba’s business ethics obligations and to read the Code of Conduct, see <https://www.sariba.com/om-oss/code-of-conduct/>.

5. Conclusions from the performed due diligence assessment.

Sariba is considered to be covered by the provisions of the Transparency Act by meeting the minimum requirements for sales income, number of employees and balance sheet sum as defined in the law. The due diligence assessments related to the Transparency Act shall, among other things, be proportionate to the size of the enterprise, the nature of the business and the context within which the business takes place.

All of Sariba’s key suppliers are located in Europe. Sariba has a Code of Conduct in place. The Code of Conduct informs the expectations Sariba has of itself but also of its suppliers and partners.

Sariba has a good process for internal training related to ethical values and the rights you have as an employee in the organization, and a communicated and established whistleblowing process.

In April 2026, the management of Sariba performed the due diligence assessment and looked for actual, or risks of, adverse impacts on human rights or decent working conditions in Sariba’s own operations, their supply chain and other business relationships. The management team reviewed all suppliers and partners that Sariba has used for the past year. The classification and categorization looked at, among other things, volume, geographic allocation and the high-risk sectors identified by the supervisory authority among suppliers. The due diligence process was presented to the Board in April 2026.

Sariba sent out requests to the identified organization and asked the supplier for a written response on how they work with ensuring that the requirements of the Transparency Act are met and to sign the attached Code of Conduct. All suppliers have confirmed their commitments around the areas covered by the Transparency Act.

According to the performed risk assessment and results of the follow up from identified suppliers, there is no need for further actions or mitigations towards Sariba’s suppliers and business partners.

6. Versions

Version no.	Owner (function)	Last updated	Signed by the Board
1.0	CEO	11.04.2026	27.08.25