



Transparency Act Account

Nagarro AS

June 2024

About this account: This account describes our risk management policies and processes with regards to human rights and decent working conditions, as well as the major risks we have identified and the steps we have taken to mitigate those risks.

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ABOUT US :

Nagarro is a corporate group with Nagarro SE as the group 's parent company. Nagarro is a leading global provider of concepts and solutions for business process digitalization offering various technology services, including digital product engineering, e-commerce, and customer experience services, artificial intelligence ("AI") and machine learning ("ML")-based solutions, cloud and Internet of Things ("IoT") solutions, and consulting on next-generation enterprise resource planning ("ERP").

Nagarro is listed on the Frankfurt Stock Exchange in Germany. Conduct AS (founded in 2001) joined the Nagarro Group on 1 February 2016 and became a Norwegian subsidiary of the group ('Nagarro in Norway').

With operations in 36 nations, employing over 19,000 plus employees globally. Nagarro uses a virtual organizational paradigm that is not limited by geography and does not have a physical headquarters. Working with our international colleagues to support our client allows us to take use of our worldwide presence and resources. We employ about 40 people in a hybrid work paradigm at our premises in central Oslo, Norway.

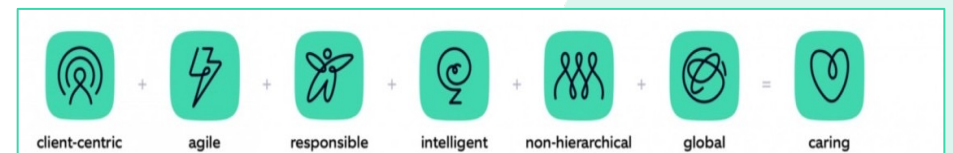
In Norway, we are leading in areas of identity and access management, as well as Atlassian advisory. We assist top businesses in the BFSI, automotive, telecommunications, public administration, and other sectors and industries. In the areas of identity and access management (IAM/IRM), security (forensics and penetration testing), business intelligence/analytics, ITSM/process support, and consulting, we offer a wide range of services.

The Transparency Act entered into effect on July 1, 2022. The objective of the Act is to promote and ensure that companies respect fundamental human and labor rights. The Act is also intended to ensure the public access to information about how companies manage their human rights risk.

The Transparency Act obliges Nagarro to:

- Carry out due diligence per the OECD Guidelines for Multinational Enterprises;
- Provide an account of our due diligence related to human rights and decent working conditions, and
- Respond to information requests from the general public

Nagarro is :



INTERNAL PROCEDURES AND GUIDELINES :

Our courteous and rights-focused business conduct towards our coworkers is guided by our 'Constitution' ([The Nagarro Constitution](#) / Code of Conduct). All regulations pertaining to occupations health, safety, and data protection, including those concerning working hours, child and forced labor, GDPR, and privacy, are followed by us. We value freedom of speech and do not practice discrimination. Our Norway employee handbook also offers broad standards and information for our coworkers.

Our Supplier Code of Conduct outlines our expectations for suppliers to act responsibly and respect human rights. This includes adhering to labor laws, avoiding discrimination, ensuring safe working conditions and allowing employees to report concerns without fear of retaliation. Suppliers must also avoid child and forced labor and carefully source materials from conflict areas.

For Nagarro in Norway, we have a global whistleblower process in place. Stakeholders and colleagues can use whistleblower@nagarro.com or HRfiles@nagarro.com to report unethical behavior or guideline violations. How to report and how reports are handled are explained in the protocol. Furthermore, contractors and colleagues can anonymously report issues using an online Suggestion Box without worrying about reprisals.

To guarantee continued adherence to the Transparency Act, we continually enhance our policies and processes to align with requirements set forth in the Transparency Act. Determining internal accountability and obligations is part of this. See the 'Measures and Plans' section for more information.

Our work on fundamental human rights and decent working conditions are guided by the following principles:

- Our Code of Conduct:
The Nagarro Constitution
- Internal Whistleblowing
- Supplier Code of Conduct

IDENTIFICATION AND MANAGEMENT OF RISK

We have in place a risk management system and grievance mechanisms in addition to our internal procedures and guidelines that provide direction to our efforts to promote fundamental human rights and decent working conditions.

OUR RISK MANAGEMENT SYSTEM

Our centrally controlled risk management process facilitates early risk identification and preventive measures which includes identification, evaluation, communication, and ongoing monitoring. As a personal assistant, our tool Ginger gathers automatic data on a range of global risk categories, including workplace safety, immigration, labor law violations, and discrimination.

Risk assessments are carried out by our teams across all business divisions and operations around the globe. System prompts are sent to respective Team leads on a regular basis to do assessments in their spheres of influence, guaranteeing that pertinent risks are handled locally. After that, if required, the reported data is handled by respective central functions, which also organizes action plans, continuous monitoring, and risk mitigation strategies throughout the entire company. Risks are evaluated taking into account existing goals and mitigating factors, as well as likelihood and potential impact. Senior management are alerted when major hazards are found so they can take appropriate action.



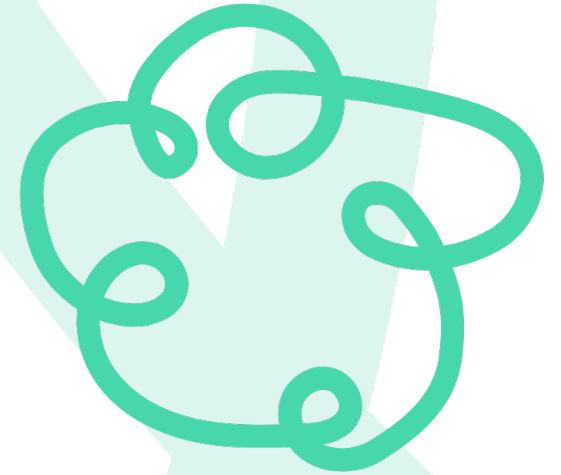
OUR DUE DILIGENCE APPROACH

As part of our commitment to upholding the Transparency Act, we've conducted a risk assessment to identify any possible areas in our operations and supply chains that may have an influence on basic human rights and decent working conditions. Our approach is majorly in line with the OECD Due Diligence Model for Responsible Businesses Conduct.

RESULT OF ASSESMENT

Based on the assessments carried out so far, we have not identified any noteworthy findings or actual violations of human rights, and we found decent working conditions in the company.

We believe that the internal procedures we have in place successfully handled any possible negative effects on our business. We have given our supply chain top priority in response to industry-wide and international supply chain threats. Please refer to the 'Measures and Plans' Section for further details on our plans for the future as well as our executed measures.



OUR DUE DILIGENCE – OWN OPERATIONS

Our projects in Norway predominantly rely on internal resources, some sourced from countries with varying labor standards. Project-based work with flexible arrangements may pose challenges in workload balance, but we manage this effectively through global processes & systems, internal control & routines, and compliance with Norwegian laws. Identifiable industry risks, such as privacy concerns and discrimination, are managed through robust system controls measures and diversity initiatives. While well-managed, ongoing monitoring aligns with Transparency Act goals.

OUR DUE DILIGENCE – SUPPLY CHAIN

No immediate negative effects from our procurement practices were discovered during our assessment. Risks associated with sale of license are mostly industry-specific.

Purchasing services carries moderate inherent risks, especially in industries with well-known problems. Streamlining the procurement process is in line with our long-term goals.

Potential risks in our own operations stem from the worldwide deployment of internal resources. Some known industrial risks have also been found by our assessment.

OUR MEASURES – OUR EFFORTS TO PREVENT AND MITIGATE RISK

In order to uphold human rights, provide fair working conditions, and encourage improvement among our partners and suppliers, we have general processes and procedures in place. The actions are intended to drastically lower the possibility of unfavorable outcomes arising from our company's operations.

DECENT WORKING CONDITIONS

- We have global norms to ensure safe and healthy working conditions for our colleagues, regardless of their geographical context, in order to ensure good working conditions in our own operations
- Additionally, we use a Resource management system to keep track of skills and resources that are available, guaranteeing optimal job distribution and avoiding undue burdens
- Our global “Work from Anywhere” (or “WFA”) approach is another illustration which give our coworkers extreme flexibility by letting them customize their workdays to suit their needs and work from a place that's best for them. Our core values, based on the acronym “CARING”, are our guiding principles across the globe. CARING stands for a humanistic way of thinking and nurturing, with a strong emphasis on ethics.
- Our work-life policy encourages more equity and inclusivity in the workplace and allows our coworkers to manage their personal and professional lives as best suits their needs.

PLAN FOR FUTURE :

We have determined specific actions that we intend to take in response to our risk area of priority based on our due diligence efforts. We anticipate that planned actions will raise awareness among our suppliers as well as internal teams while also reducing risk further within our prioritized risk categories. We intend to concentrate on and address the following areas and initiatives as part of our continuous efforts:

SUPPLIER FOLLOW-UP MEASURES

- Examine our procurement procedures to make sure we have strong protocols that support ethical purchasing
- Regular efforts to evaluate the risks to human rights when choosing new suppliers and making important procurement decisions which will also keep our policies up to date
- Make sure to support efficient risk management in our supplier segments and priority areas

OUR OWN OPERATIONS

Actions to mitigate risks associated with the use of worldwide resources. Our goal is to provide a more organized method for handling the risks associated with the use of worldwide resources and project-based workloads. This means keeping an eye on potential risks, making sure that everyone is adhering to the set working hours, and making sure that coworkers are not overworking themselves, especially when employing resources that are situated outside of Norway.



The Transparency Account has been approved by the Board of Directors of Nagarro AS on June 20th 2024.

Annette Mainka

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Annette Mainka
Chairperson of the board

Jon-Erik Trøften

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Jon-Erik Trøften
Board member

Thomas Aardal

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Thomas Aardal
Board member