

TRANSPARENCY ACT STATEMENT

Account of Due Diligence

Pursuant to the Norwegian Transparency Act (Åpenhetsloven), § 5

Reporting entity: nShift – nShift Group AS

Registered office: Stortorvet 7, 0155 Oslo, Norway

Reporting period: Financial year 2025 (1 January – 31 December 2025)

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1. Introduction and purpose

This statement is the due diligence account published by nShift (nShift Group AS, “nShift”, “the Group”, “we”) in accordance with section 5 of the Norwegian Act relating to enterprises’ transparency and work on fundamental human rights and decent working conditions (the Transparency Act / Åpenhetsloven). It describes the due diligence we have carried out for the 2025 financial year to identify, prevent and mitigate adverse impacts on fundamental human rights and decent working conditions connected to our own operations, our supply chain and our business partners.

The purpose of the Transparency Act is to promote enterprises’ respect for fundamental human rights and decent working conditions, and to ensure public access to information about how enterprises address adverse impacts. nShift supports these objectives. Our due diligence is conducted in line with the OECD Guidelines for Multinational Enterprises and the associated OECD Due Diligence Guidance for Responsible Business Conduct, as required by section 4 of the Act.

Scope and applicability. nShift is covered by the Transparency Act as a larger enterprise. For the 2025 financial year the Group reported annual turnover of approximately NOK 1,003,292,000 and a balance sheet total of approximately NOK 3,533,381,000, each well above the Act’s thresholds (NOK 70 million turnover and NOK 35 million balance sheet total). The Group employed 408 full-time equivalent employees during the period. nShift therefore meets the size criteria and falls within the scope of the Act.

nShift Group AS, as an individual entity, reported an annual turnover of 689,161,821 NOK and a balance sheet total of 3,214,810,206 NOK for the 2025 financial year.

2. About nShift – organisation and area of operations

Business. nShift is a business-to-business (B2B) provider of parcel delivery management software. Our platform enables retailers, e-commerce businesses and logistics operators to manage shipping, connect to a broad network of carriers, automate delivery choices at checkout, and track and manage parcels across their delivery operations. We provide software and related services; we do not manufacture or sell physical hardware to our customers.

Legal entity. This account is published by nShift Group AS, the Group parent entity registered in Norway. The Group’s head office is at Stortorvet 7, 0155 Oslo, Norway. This account covers the Group’s operations and sales.

Geographic footprint. nShift operates and/or sells across nine countries:

| Country | Role (operations / sales / both) | Notes |
|---------|----------------------------------|-------------------|
| Norway | Both | Group head office |
| Sweden | Both | |
| Finland | Both | |
| Denmark | Both | |

| Country | Role (operations / sales / both) | Notes |
|----------------|----------------------------------|-------------------|
| United Kingdom | Both | |
| Netherlands | Both | |
| Belgium | Sales | |
| Romania | Operations | |
| Poland | Sales | Under liquidation |

Supply chain and business partners. As a software business, nShift's most significant suppliers and business partners include cloud hosting and data-centre providers, providers of IT hardware and equipment used to run our services, software and technology subcontractors, and providers of outsourced development, testing and customer-support services. Our platform also integrates with a wide range of parcel carriers and logistics providers on behalf of our customers.

Cloud / hosting and data-centre providers. Amazon Web Services EMEA SARL, Orange Business Services AB, Telenor Sverige AB and Link Mobility AS, among others. Our primary hosting region is Norway.

IT hardware and equipment. Novo IT AB.

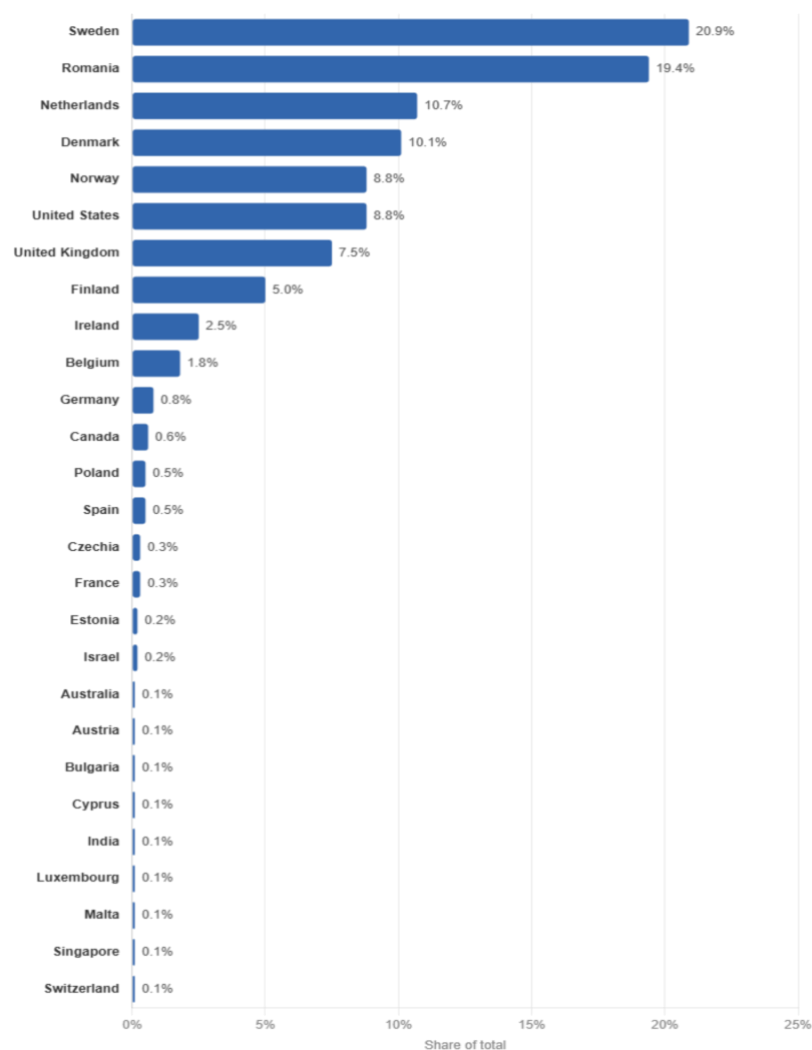
Outsourced development, QA and support partners.

| Vendor | Country |
|----------------------------------|----------------|
| Cadran Consultancy | Netherlands |
| Copernicus | Netherlands |
| Deloitte Consulting LLP | United States |
| EPAM Systems, Inc. | United States |
| GleSYS AB | Sweden |
| Jagat Singh | India |
| James L Sims | United Kingdom |
| Odă Raluca-Georgiana (PFA) | Romania |
| Swanky Group Limited | United Kingdom |
| Tribe AI / Mercury Inc. | Canada |
| Christoffer Jon Sinnbeck Consult | Denmark |
| Excedo Networks AB | Sweden |
| ZANGABEE | Netherlands |
| Prepare B.V. | Netherlands |
| Evers TP B.V. | Netherlands |

| Vendor | Country |
|---|----------------|
| Vestfjorden Consulting AS | Norway |
| Exsitec AS (Vitari) | Norway |
| DNV GL Business Assurance Norway AS | Norway |
| Canon Norge AS | Norway |
| Cegal Sverige AB (formerly SQL Service Nordic AB) | Sweden |
| Exsitec AB | Sweden |
| Eckerström Lönetjänst AB | Sweden |
| Latham & Watkins | United Kingdom |
| Intersoft Systems & Programming Ltd | United Kingdom |
| J4C Associates Ltd | United Kingdom |
| RSM US LLP | United States |
| SNS APJ Pte. Ltd. | United Kingdom |
| Wrike, Inc. | United States |
| Dayforce A/S | Denmark |
| ZRGWEB Optimization S.R.L. | Romania |

Other suppliers. In total we worked with almost 900 suppliers during 2025. Our suppliers and business partners are located across various regions, predominantly within Europe.





3. Governance, policies and procedures

Responsibility for human rights and decent working conditions, and for our work under the Transparency Act, is owned at Chief People Officer level. Day-to-day implementation is carried out by the People team.

Our due diligence is supported by the following guidelines and procedures:

- **Code of Conduct – in place.** It consists of policies and procedures including:
 - Working time policy
 - Managing performance
 - Support for nShift managers
 - Whistleblowing policy
 - Modern Slavery Policy
 - Anti-Harassment & Anti-Discrimination Policy
 - Health, Safety & Environmental Policy
- **Supplier / Partner Code of Conduct – in place.** It consists of the Supplier Manager Policy and the Supplier Request Form process.

- **Diversity, Equity, Inclusion & Belonging (DEIB) – in place.**

At nShift we are committed to fostering a workplace that values Diversity, Equity, Inclusion and Belonging (DEIB) while making a meaningful impact through our Corporate Social Responsibility (CSR) initiatives. We are committed to being a responsible corporate citizen and to contributing to the sustainable development of society. Our CSR policy sets out our commitment to conducting business in an ethical and socially responsible manner, and we strive to integrate social, environmental and economic considerations into our decision-making to create a positive impact on our stakeholders and the communities we operate in.

The purpose of the nShift Diversity & Inclusion Policy is to provide guidelines ensuring that we implement and enforce policies and procedures that effectuate our commitment to equal employment opportunities, non-discrimination, diversity and inclusion, and, where applicable, affirmative action programmes for all candidates and employees, as well as equal advancement opportunities. nShift does not unlawfully discriminate and welcomes, integrates and values people from all backgrounds — including ethnicity, religion, gender, LGBTQIA+ identity, national origin, citizenship, ancestry, age, disability, genetic information, family-care status, social background, military or veteran status, refugee status, or any other basis protected by applicable law. Our equal-opportunity policy reflects our commitment to ensuring equality, promoting diversity, and complying fully with applicable anti-discrimination laws.

- **Whistleblowing and grievance mechanism – in place.** Reporting channels are:
 - Reporting to management
 - Anonymous reporting
 - Reporting to the People team

4. Our due diligence methodology

nShift bases its due diligence on the six-step model in the OECD Due Diligence Guidance for Responsible Business Conduct. Due diligence is risk-based and proportionate: where we cannot address every risk at once, we prioritise the most severe potential and actual impacts based on their likelihood and seriousness. The six steps are:

1. **Embed** responsible business conduct into our policies and management systems.
2. **Identify and assess** actual and potential adverse impacts in our own operations, supply chain and business relationships.
3. **Cease, prevent or mitigate** those impacts.
4. **Track** implementation and results.
5. **Communicate** how impacts are addressed, including through this account.
6. **Provide for or cooperate in remediation** where we have caused or contributed to an adverse impact.

Activities carried out in 2025. We have continued to collect and map supplier information through our due diligence system, enabling targeted investigations and follow-up where needed. In 2025 we further refined our risk-scoring methodology to better identify suppliers operating in, or connected to, politically unstable jurisdictions, so that emerging risks are detected proactively rather than reactively.

5. Identified actual adverse impacts and significant risks

Through our due diligence we have assessed where the most significant risks of adverse impacts on fundamental human rights and decent working conditions are likely to arise. For a B2B software provider, the principal risk areas are set out below.

5.1 Own operations and workforce

Across our nine countries of operation, potential risks relate to working hours and workload, equal treatment and non-discrimination, freedom of association, and health and safety in office and remote-working settings. Several of our markets are EU/EEA jurisdictions with strong labour protections, which reduces inherent risk.

Less than 0.12% of our vendors were located in countries classified as risk countries. For vendors in the “high-risk” category we have taken further action: we engaged the person responsible for suppliers internally at nShift, carried out further investigations, and sent specific questions to each supplier for dialogue and assessment. Active vendors in the high-risk category are located in:

- India – 1 vendor

Emerging-risk watch item. Although Israel does not rank highly as a fragile state or for poor labour rights, the recent outbreak of conflict in the region may raise concerns about stability and the safeguarding of employees’ rights, particularly fair human rights and working conditions. We will follow up on whether this could affect nShift in any way going forward.

5.2 Cloud and data-centre infrastructure

Our services rely on third-party cloud and data-centre providers. Risks in this tier relate primarily to labour conditions of facility and contract staff and to broader working-condition standards at large infrastructure operators. These suppliers are typically large, mature organisations with their own published human-rights and supplier standards, which we factor into our assessment.

5.3 Hardware and electronics supply chain

The IT hardware and equipment underpinning our services originates from global electronics supply chains. These chains carry well-documented salient risks in upstream manufacturing and raw-material extraction, including excessive working hours, occupational health and safety, forced or child labour, and conflict minerals. Our connection to these risks is indirect (lower-tier), which affects the leverage we have and the measures available to us.

5.4 Outsourced development, testing and support

Where development, QA or customer-support activities are outsourced — particularly to lower-cost geographies — risks may relate to working hours, fair pay and overall working conditions at the subcontractor.

According to the Global Slavery Index 2023 (Walk Free), approximately 11 million people in India were living in modern slavery on any given day, a prevalence of about eight per 1,000 — the highest absolute number of any country.

During the reporting period we received one invoice from an individual consultant based in India, operating as a sole trader. Because this engagement involves a single self-employed

professional rather than a company employing workers, the risks of forced labour, bonded labour or unsafe working conditions identified in relation to India in the Global Slavery Index 2023 and the ITUC Global Rights Index 2025 are not considered applicable to this specific relationship. The consultant exercises full autonomy over their working conditions and is not subject to the employer–employee power imbalances that typically give rise to such concerns. No further adverse impacts were identified in connection with this supplier.

5.5 Carrier and logistics integrations

Our platform connects customers to parcel carriers and logistics providers. The delivery and last-mile logistics sector carries recognised decent-work risks (for example working hours and the employment status of delivery workers). nShift does not employ these workers or control these operations; this exposure is indirect and sits primarily with our customers and the carriers. We note it here for completeness and take our limited leverage into account when determining proportionate measures.

Summary risk assessment:

| Risk area | Actual / potential | Priority |
|--------------------------|--------------------|----------|
| Own workforce | Potential | Low |
| Cloud / data centres | Potential | Low |
| Hardware & electronics | Potential | Low |
| Outsourced dev / support | Potential | Low |
| Carrier integrations | Potential | Low |

6. Measures implemented and planned, and results

In response to the risks identified, nShift has implemented, or plans to implement, the measures below. In line with section 5(c) of the Act, we describe both the measures and their results or expected results.

6.1 Measures implemented during 2025

- **Supplier Code of Conduct – from policy to practice.** Following the establishment of the Supplier Management Policy in 2024, in 2025 we ensured that all active suppliers formally acknowledged and signed the Supplier Code of Conduct, tracked acceptance rates, and made compliance with the Code a mandatory step in onboarding new business partners. Where suppliers could not or did not comply, an escalation and remediation procedure was applied.
- **New Supplier Request Form (NSRF) adopted; top 50 suppliers screened.** Building on the launch of our due diligence tool in 2024, we matured the process by introducing periodic re-assessments of existing suppliers, establishing clear risk-scoring thresholds, and documenting corrective-action procedures for suppliers

presenting identified risks. The focus shifted from implementation to continuous improvement and audit-readiness.

- **Continuous measurement of employee engagement and satisfaction** using Officevibe. The working environment is considered good.
- **Staff training and performance management.** We adopted a new version of the Annual Performance Review, which produced better results.
- **Strengthened monitoring of labour conditions and human-rights compliance.** Having avoided transactions with high-risk countries in both 2023 and 2024, in 2025 we formalised this practice by embedding country-risk screening directly into the procurement workflow, referencing updated sources such as the ITUC Global Rights Index and the Global Slavery Index. Where engagement with an elevated-risk jurisdiction could not be avoided, we applied and documented enhanced due diligence — including the nature of the relationship and the justification for why identified risks were not applicable, as demonstrated by our approach to the sole-trader consultant from India.
- **Secure Supplier Management.** A new version of the Secure Supplier Management process was drafted.

6.2 Measures planned

- Roll out the updated Secure Supplier Management process.
- Implement the Travel & Expenses policy.
- Extend supplier assessment to the next tier of the supply chain.
- Monitor transposition of the EU Pay Transparency Directive in our EU markets.

6.3 Remediation

Where nShift determines that it has caused or contributed to harm to people or communities, we address that harm by ensuring remediation or by cooperating in remediation efforts. Remediation may include financial compensation or restitution, a public apology, or other measures to rectify the harm. It also involves ensuring access to grievance mechanisms for workers and the surrounding community, so that cases can be assessed and addressed.

We did not identify any need for remediation during the reporting period. We continue to monitor and follow up on this on an ongoing basis.

7. Right to information

Under section 6 of the Transparency Act, any member of the public has the right to request information from nShift about how we address actual and potential adverse impacts on fundamental human rights and decent working conditions. This includes both general information and information relating to a specific product or service.

Requests can be sent to post@nshift.com. We will respond in writing within three weeks of receiving the request, or, where the volume or type of information requires more time, within two months, in accordance with the Act.

8. Approval and signatures

This account has been considered and approved by the Board of Directors of nShift Group AS, and is signed in accordance with the signature rules of the Norwegian Accounting Act. It will be made easily accessible on nShift's website and updated by 30 June each year, and otherwise in the event of significant changes to our risk assessment.

Place and date: Oslo, 26.06.2026

Ross Finday / Director of Corporate Development

Ross Finday

Thomas Angell / SVP

Thomas Angell

Verification

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