



Due diligence assessment **2023**

Boost.ai's measures to implement the Norwegian Transparency Act

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1. Introduction

The boost.ai-group (hereinafter referred to as “boost.ai”) has its registered headquarters in Sandnes, Norway and presence in other countries including; Finland, Sweden, Denmark, England and United States of America. Our core business is the provision of Software as Service (SaaS) which customers can use to build customized virtual agents to serve their needs.

Boost.ai has prioritized initiatives to incorporate environmental, social, and governance (ESG) criteria into its operating framework to reflect its commitment to our customers, partners, stakeholders, employees and the community at large in which we operate. As a company, boost.ai strives to build a diverse, equitable and environmentally friendly work environment for our employees, and we expect our suppliers and business partners to have the same commitment.

For the reasons above, boost.ai is eager to implement Åpenhetsloven/the Act on companies’ transparency and work with basic human rights and decent working conditions (the “Transparency Act”) in our business.

Boost.ai is taking the obligations under the Transparency Act seriously and we have started work on the due diligence process which is collaboratively conducted by various departments within the company and with full support from the Senior Management Team.

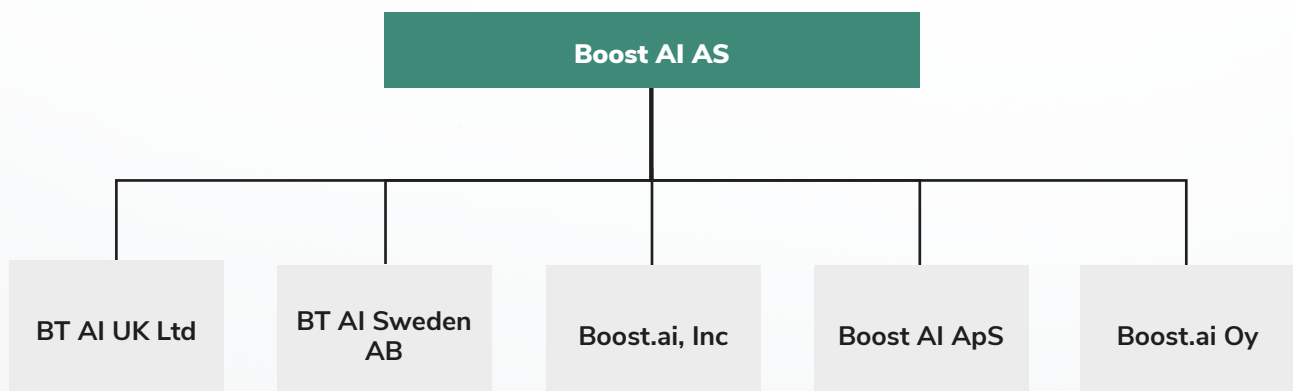
Boost.ai recognizes that the due diligence process is a continuous process and requires updates from time to time. This report shall act as the initial report on the methodologies implemented by boost.ai, findings, future plans and actions taken by boost.ai in its route to comply with the Transparency Act.

2. Commitment statement

Boost.ai's commitment to respect and promote human rights and decent working conditions are anchored in boost.ai's, employment contracts, internal policies, Employee Handbooks, ethical guidelines and our Code of Conduct.

3. boost.ai's group company information

The figure below describes boost.ai's current group organizational structure;



4. Routines and procedures implemented by boost.ai to comply with the transparency act

This section covers the actions taken by boost.ai to identify, mitigate and account for potential human rights violations within its supply chain. The approach implemented by boost.ai in its compliance with the Transparency Act is the risk-based approach. As further discussed in this report.

4.1. Risk assessments

Boost.ai continues to affirm our commitment and dedication to comply and conform with the laws and obligations imposed on us by the government by performing, initially, a general assessment (due diligence) specifically to assess compliance within our current supplier portfolio with regards to their observation and alignment with the acceptable standards of their employee rights and welfare at work. The focus areas while conducting the assessment are; equality, diversity and inclusion, discrimination of any kind, social-welfare of employees. Risks are categorized in order to determine if action is required.

The table below provides the specific potential areas of concern and the category of the risk that has been anticipated. A level of risk is measured based on the damage that the risk

Area considered	Basis for consideration	Level of risk anticipated.
Location in “Red zones”	Suppliers that are located in countries that are identified as risky due to either country’s non compliance and non-ratification of ILO Conventions or employee experience, countries located in the Middle East, Northern Africa, South America and Asians countries.	High
Remote working companies	Suppliers who widely engage in remote working, this may implicate some risks since the workers do not enjoy the same benefits like those at work. Example: injuries at work insurance benefits, there is no clear definition of when work begins or ends.	Medium
Supplier’s published documents and statements	Absence of core human rights principles enshrined in the company values like inclusivity and equality, freedom including of expression, anti slavery and modern slavery etc.	High
Number of employees	The number of employees could indicate the amount of work that an employee would be required to do (potential of overworked employees if the number is too low).	Medium-High

Area considered	Basis for consideration	Level of risk anticipated.
Award and Recognition	Suppliers that have received awards and recognition from prominent and credible organizations with regards to workplace like; best workplaces, best employers etc.	Low
Location in Green-zones	Where the company is located in Norway or Nordic countries that generally impose strong minimum legal requirements that comply with human rights.	Low
Supplier's transparency	Suppliers that are transparent with sharing their hiring processes, code of conduct with a way to prove its relevance like by sharing photos and employee blogs etc.	Low

4.1.1. Methods used for the assessment

Online Assessments

Most of the assessment was conducted online in order to identify risks both existing as well as potential risks that must be taken into account. Through the suppliers official websites first hand information on the company was retrieved like;

- Code of conduct which gives an inside perspective on what the company believes in.
- List of sub-processors and affiliated companies.
- Company values which shows the relationship between the employer and employees.
- Employee benefits that are posted on the suppliers' career section on their websites, with the intention to attract potential employees to apply for a job position. This information is vital as it indicates the presence or absence of benefits. Normally here, the company provides information such as whether they provide insurance, the different leaves entitled to the employee, the standard of pay is normally insinuated, phrases like “ offer of competitive salary” are positive etc.
- Awards and recognitions awarded to the company from credible organizations and institutions give a great impression on the supplier's compliance with regards to employee rights.

Research was made for employee reviews on credible online sources and applications like Glassdoor, LinkedIn, Indeed.com etc. The purpose of doing this is to check whether the company information on their website aligned with the employee reviews. However, in order to evaluate the accuracy and credibility of the reviews, the information is triangulated and compared with other reviews through other applications or within the same application i.e those that were repetitive are likely to be identified as a risk which necessitates further assessment or action.

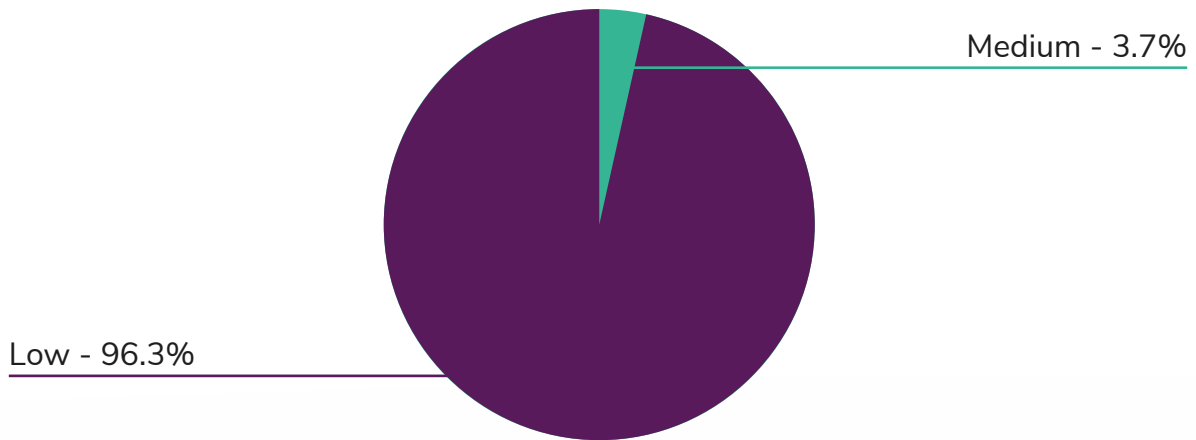
4.2 Creating an overview

Boost.ai has developed a concise and descriptive shortlist of supplier's business activities. The shortlist integrates the findings of the assessment and provides information on; the location of the company, link to the code of conduct or company values, list of subcontractors of the company, awards and recognitions, if any, as well as an overview. In the assessment boost.ai has categorized the risks based on its findings which will be provided later in this document.

4.3 Documenting the requirements by boost.ai

Boost.ai has emphasized its commitment and support for the protection of human rights internally and has documented its requirements and expectations to its employees through its internal guidelines available and accessible to all employees through the online Employee Handbook. The following topics are covered and more are added based on business requirements: Anti-slavery, Anti-tax evasion, bribery and corruption, equality, inclusion and diversity.

5. Findings



The results of the general assessment shows overall compliance in most of the prominent areas of concern by the suppliers. The majority of the suppliers that were assessed showed a good degree of compliance with the critical issues that require attention. Having a large number of suppliers, it may not be feasible that action and implementation be taken immediately, however, where necessary, risks identified as high, boost.ai will be ready to take the necessary actions.

6. Measures

Boost.ai categorizes its suppliers and takes actions based on the likelihood of non-compliance by the suppliers as further described.

6.1 Code of conduct

Boost.ai is implementing an industry standard code of conduct that among other principles, contains principles on protection of labor and human rights, protection against child labor, which requires suppliers to treat its employees fairly with non-discrimination based on race, sex, sexual orientation etc.

6.2 Implement a policy

In order to enshrine the requirements under the Transparency Act in its internal processes and procedures, boost.ai intends to implement a policy that would at a minimum require employees to vet suppliers prior to engagement, give employees more insights on what to look out for and how,

7. Additional measures

For Boost.ai suppliers that are categorized to have Medium or High likelihood of non-compliance, boost.ai will take the following actions;

7.1. Send out questionnaires

Boost.ai will send out questionnaires to its suppliers requiring them to answer questions that are relevant to assess supplier's compliance with among other things, human and labor rights.

7.2. Termination

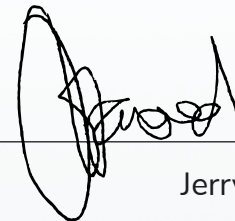
If boost.ai assess that there is a "Very High" likelihood that a supplier is non-compliant with Human and labor rights and where remedial measures are not sufficient, boost.ai will renegotiate the contracts with such suppliers. If the results are not satisfactory, boost.ai will evaluate whether it should continue its engagement with the supplier or terminate.

8. Summary and conclusion

Based on an overall assessment, the risk of our current suppliers violating labor and human rights is assessed as low. Although the risk is low, there is always room for improvement, and work with labor and human rights is a continuous work. Further analysis will be carried out based on a risk-based approach. It means that the scope of mapping and follow-up is adapted based on the risk.

9. Contact information

Boost.ai recognizes that there is always room for improvement and is welcoming of any advice, questions, and particularly concerns that you might have. If you have any questions or concerns related to how boost.ai works with the Transparency Act, please feel free to reach out to **Nunuu Hemed** via nunuu@boost.ai.



Jerry Haywood
CEO