

PUBLIC

Assesment

Due diligence 2025

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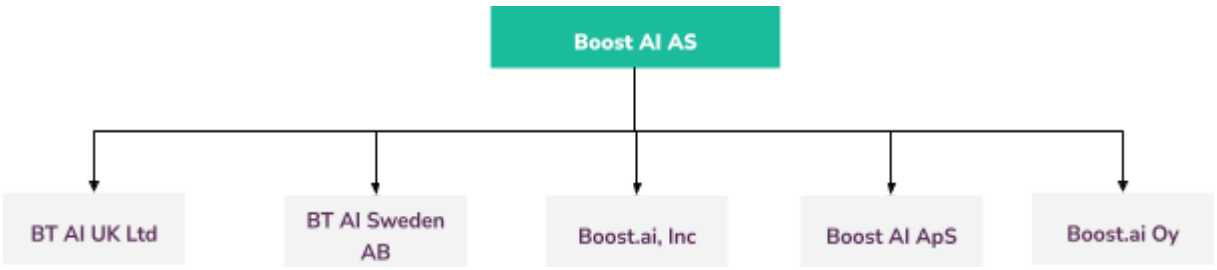
1. Introduction

The Norwegian Åpenhetsloven (hereinafter referred to as "Transparency Act"), effective from July 2022, aims to ensure that companies respect fundamental human rights and decent working conditions in their production of goods and delivery of services. Companies covered by this law must conduct due diligence assessments following OECD[1] guidelines for multinational enterprises. These assessments are designed to evaluate and prioritize the implementation of basic rights and decent working conditions, as well as to identify potential risk areas as required by businesses under Section 4 of the Transparency Act.

Boost.ai is taking the obligations under the Transparency Act seriously and we continuously 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.

2. Boost.ai's group company information

The boost.ai-group (hereinafter referred to as "boost.ai") has its registered headquarters in Sandnes, Norway and presence in other countries; Finland, Sweden, Denmark, United Kingdom and the United States of America. Our core business is the provision of Software as Service (SaaS) which our customers can use to build customized AI agents to serve their needs. The figure below describes boost.ai's current group organizational structure;

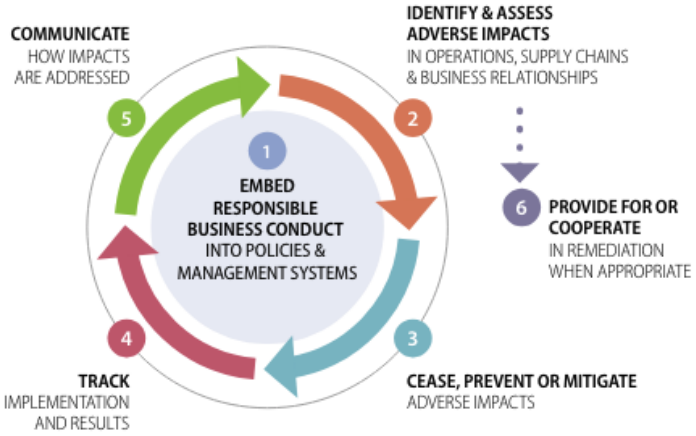


[1] Organization for Economic Cooperation and Development

3. How has boost.ai implemented the Transparency Act?

This section covers the measures taken by boost.ai to comply with the requirements under § 4 of the Transparency Act while also taking into consideration OECD due diligence guidance for responsible business conduct. The approach implemented by boost.ai in its compliance with the Transparency Act is the risk-based approach, as further discussed in this report. While we have provided thorough information under this report, it is important to note that the measures and information in this report are not exhaustive. Boost.ai continuously works towards improving its compliance with the Transparency Act and this report may not account for all measures.

The OECD provides guidelines for businesses for due diligence process, below are ways boost.ai has implemented the guidelines in its business operations:



Step 1 Anchor accountability and responsible business conduct into company's guidelines and policies

The Transparency Act requires companies bound by its provisions to embed accountability in their guidelines. To achieve this, boost.ai has set expectations relating to protection of human rights. The expectations are provided to employees, business partners and other parties who have a direct connection to boost.ai's operations. Through these guidelines boost.ai sets requirements for both internal and external purposes. The following are policies, governance documents and internal workforces that boost.ai has implemented to comply with the requirements:

- Internal Code of Conduct
- External Code of Conduct
- Employee Handbook
- Supplier Management Policy
- Internal Procurement Process
- Employment contracts
- Whistleblowing Process
- Other HR policies

The aforementioned policies and guidelines are reviewed regularly, at least annually, to adapt to evolving circumstances. Internally, we ensure that our internal policies and processes are effectively communicated to all employees. To achieve this, employees are required to review and accept these policies annually and whenever updates are made.

Boost.ai makes available the documentation that boost.ai requires its suppliers and business partners to adhere to publicly available on our company website.

Step 2 Identify and assess actual and potential adverse impacts associated with our operations, products or services.

The Transparency Act requires companies to identify and evaluate both actual and potential negative impacts on basic human rights and decent working conditions that may arise from their business activities. This includes impacts directly caused or contributed to by the business, as well as those linked to its operations, services, products, supply chain, or business partners.

Boost.ai has conducted thorough assessments to ensure compliance within our company and our current supplier portfolio. These assessments aim to verify both our own and our suppliers' adherence to acceptable human rights standards. Through our supplier assessment process, we have identified, mapped, and reported areas that may require further follow-up.

The following section outlines the measures boost.ai has taken to evaluate our own practices, as well as the steps we have implemented to assess our supply chain.

❖ How does boost.ai assess itself?

Respecting human rights is fundamental to our values and operations. We are committed to ensuring that our business practices promote dignity, fairness, and respect for all individuals' fundamental human rights.

To ensure that we are able to monitor our employees' wellbeing and welfare, boost.ai sends an Employee Satisfaction Survey twice a year to its employees with questions covering the following areas:

- Diversity and inclusion
- Communication & Collaboration
- Team
- Manager
- Leadership
- Job Satisfaction
- Work Environment

- Culture & Engagement
- Organizational Capability
- Mental Health & Wellbeing

. The responses are anonymous to allow employees to openly and freely provide feedback to management. The responses are analyzed first by Division Head and Team Managers, and in collaboration with boost.ai's Senior Management Team and Human Resource Department.

In addition, boost.ai has implemented a whistleblowing process as well as a tool allowing its employees to report issues, including those related to human rights to management.

As of the year 2025, boost.ai has not identified actual high risks related to human rights and decent working conditions from the responses provided by its employees and internal stakeholders. Furthermore, in the first half of 2025, employees rated Team Collaboration (4.28 out of 5) and Diversity & Inclusion (4.22 out of 5) as the highest-scoring topics. As a testament to this feedback, boost.ai has employees from over twenty-one (25) different cultural backgrounds.

Boost.ai is committed to the well-being of its employees and a safe work environment, and maintains an ongoing effort to monitor. of its own compliance and actions related to human rights.

❖ How does boost.ai assess its supply chain?

It is crucial for us to partner with suppliers who share our values and dedication to respecting human rights. This approach ensures that our supply chain operates responsibly and ethically, minimizing potential harm to individuals and communities.

Boost.ai has taken different measures to assess compliance with human rights and decent working conditions within our supply chain. Below are some of the methods we have employed to achieve compliance:

Maintain an overview

Boost.ai has developed a concise and descriptive shortlist of suppliers' business activities. The shortlist integrates the findings of the assessment and provides information on; the

location of the company, link to the supplier code of conduct or company values, list of subcontractors of the supplier, awards and recognitions held by the supplier, if any.

The initial assessment and overview of the suppliers was made using readily available online material and information. Boost.ai has used the suppliers' official websites to gather first hand information on topics outlined above. Boost.ai has its selected areas of attention that we look out for in doing our assessments, reference above.

Send out questionnaires to suppliers

When boost.ai assesses the need to send out questionnaires to a supplier, boost.ai will send a questionnaire and assess responses provided by suppliers. Since it may not be viable to send questionnaires to all suppliers, boost.ai will as an initial step conduct independent assessments with follow up questions to contact persons at the supplier, where there are gaps.

Boost.ai has implemented a Supplier Audit Process which is aimed at maintaining our supplier management and ensuring we continuously monitor our supplier' performance and compliance. Among other stages in the process, boost.ai sends out questionnaires to its suppliers. The standard questionnaire template includes questions relevant to the Transparency Act. A copy of the questionnaire may be provided upon request with reasonable grounds for such request.

Step 3 Measures implemented by boost.ai to mitigate the risks associated with human rights and decent working conditions.

The measures covered elsewhere in this document should also be taken into account. Boost.ai will further take the measures covered in this section.

❖ Contractual measures

Boost.ai's expectations with regard to human rights adherence are documented and set out in boost.ai's Code of Conduct, which are attached to supplier contracts. Among other principles the Code of Conduct includes principles relating to equality and non-discrimination, human rights and labor standards (human rights and anti-slavery, freedom of association and collective bargaining)[2]. Boost.ai secures the right to terminate supplier contracts for material breaches of the Code of Conduct. In addition, boost.ai maintains the right to audit suppliers for their compliance with contractual obligations including those related to the Transparency Act.

Where boost.ai assesses that there is a need for additional terms to ensure maintenance and respect of human rights boost.ai will add necessary requirements in custom contracts with its suppliers.

It is important to understand that, it may not be possible to secure this measure with every supplier based on factors such as size of the supplier company e.g. bigger suppliers in the market may not be open to signing boost.ai's Code of Conduct. In such cases, boost.ai will take into account suppliers' own Code of Conduct, documentation and request for amendments to secure its requirements.

❖ Temporary suspension of relationship

As mentioned above in this report, boost.ai continues to audit and assess its suppliers on a regular basis. In the event that boost.ai finds that the supplier has failed to comply with fundamental human rights and has not shown intention of remedying such actions, boost.ai

[2] Our Code of Conduct is retrievable via https://boost.ai/site/assets/files/1067/code_of_conduct.pdf

will temporarily suspend such a relationship until the supplier can show compliance with human rights.

❖ Disengagement with supplier

Where there are failed attempts at mitigation and supplier repeatedly shows non-compliance, boost.ai will disengage such supplier and cease all related activities associated with the supplier. This measure is taken as a last resort and taken only when; (a) there are adverse impacts; (b) non-compliance is irremediable; (c) where there is no reasonable prospect of change; or (d) when severe adverse impacts or risks are identified and the supplier does not take immediate action to prevent or mitigate them.

❖ Assigned responsibility

Boost.ai has assigned the responsibility for developing and monitoring compliance with the Transparency Act to its in-house Legal Team who have acquired training to help them understand and implement relevant aspects of due diligence needed. The Legal Team collaboratively works with other subject matter experts both internally and externally.

❖ Supplier screening at the time of engagement

Boost.ai considers early engagement with possible suppliers to be key to effectively avoid or mitigate potential adverse impacts in line with our human rights expectations.Boost.ai has developed and implemented pre-qualification processes which incorporated due diligence for suppliers and other business relationships. One of the pre-qualification criterias is suppliers' compliance with fundamental human rights and decent working conditions. At a procurement request level, boost.ai's Legal Team conducts this assessment and must approve the supplier from a Transparency Act compliance perspective. This process is documented in boost.ai's Procurement Process.

Step 4 Tracking of implementation and results

Boost.ai performs internal and external audits and reviews of the effectiveness of its policies and process and how these are complied with. The audits are performed by boost.ai internal subject matter experts and independent third parties. Boost.ai is also welcoming of feedback and input from its internal and external stakeholders.

Boost.ai tracks this to enable transparency which allows us to track the risk reduction process and understand the effectiveness of mitigating measures applied

Step 5 Communication and openness

Boost.ai is committed to openly communicating the actions taken and findings during the due diligence process with its stakeholders. This report is also a means of achieving this commitment. In this report, boost.ai has made available contact details to whom questions regarding how boost.ai works with the Transparency Act can be forwarded to.

For confidentiality purposes, boost.ai may not be able to disclose some information. However, boost.ai will take reasonable measures to ensure that we are able to provide sufficient information to allow stakeholders to understand how we work with the Transparency Act.

We acknowledge that due diligence is a continuous process and boost.ai welcomes feedback on how boost.ai can further improve.

Step 6 Remediation and notification

Boost.ai's employees and internal resources are encouraged to report unacceptable conditions regardless of whether these conditions are imposed directly on them or their colleagues. Employees are able to report the incident anonymously or can freely discuss with their direct managers. Boost.ai has zero-tolerance on retaliation against employees for reporting suspected violations.

Boost.ai also has a Working Environment Committee (WEC) which is responsible for performing the tasks provided under the Norwegian Working Environment Act (*Arbeidsmiljøloven*). A major part of the tasks includes overseeing the protection and work environment. Employees are able to freely share their concerns with the WEC which later address these concerns with management at boost.ai.

Regardless of the means used, actions are taken by boost.ai without delay to ensure that the affected employees and their grievances are resolved in a timely manner.

Externally, boost.ai has made available contact information via our websites. In addition, a contact person is also identified in our supplier contracts allowing our suppliers the ability to reach us and inform us of unacceptable conditions.

4. Findings

As a company in the SaaS industry, our suppliers are predominantly within the same sector, which is not typically associated with high risks related to human rights and working conditions. There is a common understanding that tech companies generally offer competitive work conditions. Generally, geographical location is a significant factor in our assessment of potential and current suppliers. As a company, we focus on engaging suppliers within Europe or in countries where human and employee rights are well protected. We avoid engaging suppliers in regions known for inconsistencies in human rights, such as the Middle East and Northern Africa.

The results of the general assessment shows overall compliance in most of the prominent areas of concern by boost.ai suppliers. The majority of the suppliers that were assessed showed a good degree of compliance with the critical issues that require attention with respect to human rights violations. 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.

5. 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.

Boost.ai recognizes that the due diligence process is a continuous process and requires updates from time to time. We will continue to monitor our progress in line with the requirements under the Transparency Act .

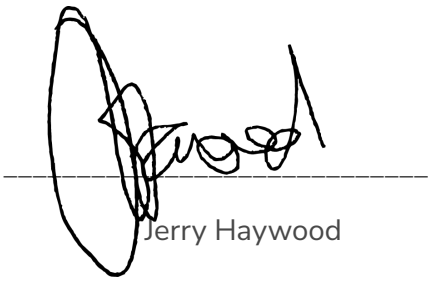
6. Contact information

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.

7. Version history[3]

Date	Version	Updated by	Description of change
30.06.2025	3.0	Nunuu Hemed	Updated the frequency and means of sending and evaluating employee reviews.
30.06.2024	2.0	Nunuu Hemed	Made updates to the report to reflect changes and updates boost.ai has made since the original report
30.06.2023	1.0	Nunuu Hemed	Original version



Jerry Haywood

CEO

[3] Previous versions, if any, are available upon request.