

Statement pursuant to the Transparency Act for Xait AS

Xait AS is subject to the Transparency Act and has initiated work on due diligence assessments in accordance with the Act's requirements. The board has resolved that the company shall comply with its obligations as defined in the Transparency Act, and that guidelines concerning responsibility for human rights and working conditions shall be applied.

Below follows Xait AS's statement regarding due diligence assessments:

1. Organization and Business Area

Xait AS (org. no. 982 339 243) is a Norwegian technology company headquartered in Stavanger. The company develops and delivers software solutions (SaaS) for document automation, collaboration, and process improvement, aimed at the corporate market in Norway and internationally. Xait AS is a wholly owned subsidiary of Xait Holding AS.

As a software company without physical production and with most of its value chain in low-risk areas, Xait AS assesses the general risk of violations of human rights and unacceptable working conditions in its own operations and supply chain as relatively low. Nevertheless, we recognize our responsibility to ensure that our suppliers and business partners also operate in accordance with fundamental human rights and ethical standards.

2. Due Diligence Assessments and Identified Risk Areas

In line with the Transparency Act and the OECD Guidelines, Xait AS has begun establishing routines for due diligence assessments. In 2025, we will systematically map and assess risks in the supply chain, with particular focus on conditions that may negatively impact human rights and working conditions.

No actual violations have been uncovered so far, but potential risks have been identified related to suppliers connected to high-risk geographies and sectors (for example, subcontractors providing IT services and data processing in third countries).

3. Planned Measures and Follow-up

As part of the implementation of the Transparency Act, Xait AS will develop and establish the following measures during 2025:

- **Ethical procurement routines:** We will develop guidelines that impose requirements on suppliers' working conditions, human rights, and sustainability.
- **Systematic follow-up of suppliers:** Procedures for documentation, evaluation, and regular assessment of supplier compliance will be introduced.

- **Whistleblowing channels:** A whistleblowing scheme will be established to enable employees and external parties to report concerns related to ethical matters.
- **Risk classification of suppliers:** All suppliers will be mapped and categorized into one of three risk classes:
 - **Red – High risk:** Requires thorough assessment and close follow-up
 - **Yellow – Moderate risk:** Requires regular assessment
 - **Green – Low risk:** Minimal follow-up obligations

The purpose of these measures is to ensure a more responsible and transparent supplier relationship and to help prevent negative consequences in our value chain.

4. Availability and Updates

This statement is published in accordance with Section 5 of the Transparency Act. The statement will be updated annually by June 30, or earlier if there are significant changes to the assessments or measures.

Date: June 2, 2025



Eirik Gudmundsen
Chairman of the Board and CEO, Xait AS



Frank Skavland
Board Member