



Transparency Act Account

Nagarro AS
June 2026



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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Transparency Act Account - 2026

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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 a wide range of technology services. These include 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 services for 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 the group's Norwegian subsidiary, known as "Nagarro in Norway."

Operating in 38 countries with a global workforce of more than 18,000 employees, Nagarro follows a virtual organizational model that is not limited by geographic boundaries and does not maintain a central physical headquarters. The company serves over 1,000+ clients worldwide, leveraging its global expertise and resources through close international collaboration. In Norway, Nagarro employs approximately 30 professionals based in central Oslo and operates under a hybrid work model.

In Norway, Nagarro is a leading provider of Identity and Access Management (IAM) and Atlassian advisory services. The company supports major organizations across various industries, including banking, financial services and insurance (BFSI), automotive, telecommunications, and public administration. Its broad service portfolio includes IAM/IRM, cybersecurity (including digital forensics and penetration testing), business intelligence and analytics, IT service management (ITSM), process support, and strategic consulting.

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.

INTERNAL PROCEDURES AND GUIDELINES

Our approach to employee relations is founded on respect for human rights and guided by the principles outlined in the Nagarro Constitution (Code of Conduct). We are committed to complying with all relevant legal and regulatory requirements, including those related to occupational health and safety, data protection and privacy (including GDPR), working time regulations, and the prohibition of child and forced labor. We promote a workplace culture that values freedom of expression and enforces a strict zero-tolerance stance on discrimination. In Norway, these commitments are further supported through our employee handbook, which provides employees with comprehensive guidance, policies, and resources.

Our Supplier Code of Conduct establishes clear standards for ethical business conduct and the protection of human rights. Suppliers are expected to comply with all applicable labor laws, maintain safe and non-discriminatory workplaces, and provide mechanisms that allow workers to raise concerns without fear of retaliation. The Code expressly prohibits the use of child labor and forced labor and emphasizes the importance of responsible and ethical sourcing practices, particularly in relation to materials originating from conflict-affected regions.

At Nagarro Norway, we promote transparency and accountability through a global whistleblowing framework. Employees, contractors, and external stakeholders can report unethical behavior or breaches of company policies through our designated channels. The reporting and case-handling procedures are clearly documented within our internal protocols. In addition, employees and contractors have access to an online Suggestion Box that enables the confidential and anonymous submission of concerns, ensuring that issues can be raised without fear of retaliation.

To maintain ongoing compliance with the Transparency Act, we periodically assess and enhance our internal policies, procedures, and governance practices to ensure alignment with the Act's evolving requirements. This includes establishing and communicating clear roles, responsibilities, and accountability across the organization. Additional information can be found in the Measures and Plans section.



OUR CODE OF
CONDUCT: THE
NAGARRO
CONSTITUTION

INTERNAL
WHISTLEBLOWING

SUPPLIER CODE OF
CONDUCT



IDENTIFICATION AND MANAGEMENT OF RISK

In addition to our established internal policies and procedures, we have implemented a robust risk management framework and grievance mechanisms. These measures support our commitment to safeguarding fundamental human rights and promoting fair and decent working conditions across our operations and throughout our value chain.

OUR RISK MANAGEMENT SYSTEM

Our centrally coordinated risk management framework is designed to facilitate the early identification and proactive mitigation of risks. The process encompasses risk identification, assessment, communication, and ongoing monitoring to ensure effective risk oversight.

Risk assessments are carried out on a regular basis across all business units and global operations. Team leaders are prompted to evaluate risks within their respective areas of responsibility, ensuring that relevant issues are identified and managed at the local level. Where appropriate, assessment results are escalated to central functions, which are responsible for developing mitigation plans, overseeing continuous monitoring activities, and coordinating risk management efforts across the organization. Risks are assessed against defined objectives, mitigating factors, probability, and potential impact. Significant risks are promptly escalated to senior management to support timely decision-making and appropriate corrective action.



OUR DUE DILIGENCE – OWN OPERATIONS

In Norway, our project delivery model is largely supported by internal personnel, including team members located in regions with varying labor standards. Although project-based assignments and flexible working arrangements may present challenges related to workload allocation, these are effectively managed through established global systems, internal governance controls, structured processes, and adherence to Norwegian labor legislation. Industry-related risks, including data privacy concerns and the potential for discrimination, are mitigated through robust control mechanisms and ongoing diversity and inclusion initiatives. These risks are currently considered to be well-managed, and we maintain continuous monitoring to ensure alignment with the objectives of the Transparency Act.

OUR DUE DILIGENCE – SUPPLY CHAIN

Our assessment did not identify any immediate adverse impacts arising from our procurement activities. The risks identified in relation to license sales are largely industry-specific in nature and are subject to ongoing monitoring and evaluation.

The procurement of services carries a moderate level of inherent risk, particularly within sectors that are known to face recurring challenges. Enhancing and streamlining our procurement processes supports our long-term strategic goals while reinforcing our commitment to responsible and sustainable sourcing practices.



OUR MEASURES – EFFORTS TO PREVENT AND MITIGATE RISK

To uphold human rights, promote fair and safe working conditions, and encourage continuous improvement among our partners and suppliers, we have implemented comprehensive processes and procedures. These measures are designed to effectively mitigate the risk of adverse impacts arising from our business activities and operations.

DECENT WORKING CONDITIONS

- To uphold consistent standards across our global operations, we adhere to established international practices that promote safe and healthy working conditions for all employees, regardless of their geographic location.
- We also utilize a resource management system to monitor workforce skills and capacity, supporting effective task allocation and helping to prevent excessive workloads.
- Our global “Work from Anywhere” (WFA) model reflects our commitment to flexibility by empowering employees to structure their work arrangements in a manner that best supports their productivity and well-being. This approach is aligned with our people-centric culture and guided by our core values, represented by the acronym CARING. These values foster a culture of respect, ethical behavior, and a human-centered approach across our global organization.
- Our work-life balance policy promotes inclusivity and fairness by enabling employees to manage their professional and personal responsibilities in a way that accommodates their individual circumstances and needs.



PLAN FOR FUTURE

Based on the outcomes of our due diligence activities, we have identified a number of priority actions aimed at addressing key risk areas. These initiatives are intended to strengthen awareness among both suppliers and internal stakeholders while further reducing risks within our identified priority categories. As part of our commitment to continuous improvement, we will focus on the following areas and initiatives going forward:

SUPPLIER FOLLOW-UP MEASURES

We continue to advance the measures introduced in the previous year, further strengthening our commitment to ethical procurement practices and responsible supply chain management.

- Ongoing evaluation of our procurement processes to ensure that effective controls and procedures are in place to support ethical and responsible purchasing practices.
- Continuous assessment of human rights risks when onboarding new suppliers and making significant procurement decisions, ensuring that our policies remain up to date and aligned with recognized best practices.
- Strengthening risk management across key supplier segments and priority risk areas through enhanced oversight, monitoring, and proactive mitigation measures.

OUR OWN OPERATIONS

We are committed to further strengthening our approach to managing risks associated with the use of global resources and project-based work arrangements. This includes the proactive monitoring of potential risks, ensuring adherence to established working time requirements, and implementing measures to prevent excessive workloads, particularly when engaging resources located outside Norway.

The Transparency Act Account has been approved by the Board of Directors of Nagarro AS on 30th June 2026



Annette Mainka
Chairperson of The Board



Thomas Aardal
Board Member



Jon-Erik Trøften
Board Member