



Transparency Act Account

Nagarro AS
June 2025

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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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 various technology services, including 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 on 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 a Norwegian subsidiary of the group ('Nagarro in Norway').

Operating in 39 countries with a global workforce of over 18,000 employees, Nagarro follows a virtual organizational model—free from geographic constraints and without a central physical headquarters. We serve over 1,000 clients worldwide, leveraging our global expertise and resources through close international collaboration. In Norway, we employ approximately 30 professionals based in central Oslo, working within a hybrid work model.

In Norway, Nagarro is a leading provider in the fields of identity and access management (IAM) and Atlassian advisory services. We support leading organizations across a variety of sectors, including banking, financial services and insurance (BFSI), automotive, telecommunications, and public administration. Our broad service portfolio includes IAM/IRM, cybersecurity (including 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

7 core values of Nagarro:



Client-centric



Agile



Responsible



Intelligent



Non-hierarchical



Global



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INTERNAL PROCEDURES AND GUIDELINES :

Our respectful, rights-focused approach to working with colleagues is grounded in the principles of our 'Constitution' (The Nagarro Constitution / Code of Conduct). We adhere to all applicable regulations related to occupational health and safety, data protection (including GDPR and privacy), working hours, and the prohibition of child and forced labor. We actively uphold freedom of expression and maintain a zero-tolerance policy toward discrimination. In Norway, our employee handbook provides comprehensive guidelines and essential information to support our team.

Our Supplier Code of Conduct sets clear expectations for responsible business practices and respect for human rights. Suppliers are required to comply with applicable labor laws, ensure non-discriminatory and safe working environments, and enable workers to report concerns without fear of retaliation. The Code strictly prohibits child and forced labor and calls for careful, ethical sourcing of materials—particularly from conflict-affected areas.

At Nagarro Norway, we uphold transparency and accountability through a global whistleblower process. Colleagues and stakeholders can report unethical conduct or violations of company guidelines via whistleblower@nagarro.com or HRfiles@nagarro.com. The reporting procedure and handling process are clearly defined in our internal protocol. Additionally, both employees and contractors can submit anonymous concerns through our online Suggestion Box, ensuring their voices are heard without fear of retaliation.

To ensure continued compliance with the Transparency Act, we regularly review and strengthen our internal policies and processes to align with its evolving requirements. This includes clearly defining responsibilities and accountability within the organization. For further details, please refer to the Measures and Plans section.

Our work on fundamental human rights and decent working conditions are guided by the following principles:

- Our Code of Conduct:
The Nagarro Constitution
- Internal Whistleblowing
- Supplier Code of Conduct

IDENTIFICATION AND MANAGEMENT OF RISK

In addition to our internal procedures and guidelines, we have established a comprehensive risk management system and grievance mechanisms. These tools guide our efforts to uphold fundamental human rights and ensure decent working conditions throughout our operations and value chain.

OUR RISK MANAGEMENT SYSTEM

Our centrally managed risk management process enables early identification and proactive mitigation of risks. This includes comprehensive steps for risk identification, evaluation, communication, and continuous monitoring.

Risk assessments are conducted regularly by our teams across all business divisions and operations worldwide. Team leads receive system prompts to perform assessments within their areas of responsibility, ensuring that relevant risks are managed locally. When necessary, the data is escalated to central functions, which oversee the development of action plans, continuous monitoring, and risk mitigation strategies across the entire organization. Risks are evaluated based on established goals, mitigating factors, likelihood, and potential impact. Senior management is promptly notified of significant risks to enable timely and appropriate action.



OUR DUE DILIGENCE – OWN OPERATIONS

In Norway, our project delivery model is primarily supported by internal talent, including resources from regions with diverse labor standards. While project-based work and flexible arrangements can create challenges in workload distribution, these are effectively managed through global systems, internal controls, structured routines, and full compliance with Norwegian labor laws. Industry-specific risks—such as privacy concerns and discrimination—are addressed through strong system control measures and active diversity initiatives. These risks are currently well-managed, and we continue ongoing monitoring in line with the objectives of the Transparency Act.

OUR DUE DILIGENCE – SUPPLY CHAIN

Our assessment did not reveal any immediate negative impacts stemming from our procurement practices. Identified risks related to license sales are primarily industry-specific and are being monitored accordingly.

Purchasing services involves moderate inherent risks, particularly in industries known for recurring challenges. Optimizing and streamlining our procurement processes aligns with our long-term strategic objectives and commitment to responsible sourcing.



OUR MEASURES – OUR EFFORTS TO PREVENT AND MITIGATE RISK

To support human rights, ensure fair working conditions, and promote continuous improvement among our partners and suppliers, we have established comprehensive processes and procedures. These measures are designed to significantly reduce the risk of adverse impacts resulting from our business activities.

DECENT WORKING CONDITIONS

- To maintain high standards across our operations, we follow global norms that ensure safe and healthy working conditions for all colleagues—regardless of their geographical location.
- In addition, we utilize a resource management system to track available skills and capacity, ensuring optimal task allocation and preventing excessive workloads.
- Our global “Work from Anywhere” (WFA) model exemplifies our commitment to flexibility, enabling colleagues to tailor their workdays and choose the environment that best supports their productivity and well-being. This approach reflects our people-first philosophy. Our organizational values are embodied in the acronym CARING, which guides our culture worldwide. CARING represents a humanistic and nurturing mindset, with a strong focus on ethical conduct and mutual respect.
- Our work-life policy promotes greater equity and inclusivity, enabling colleagues to manage their personal and professional lives in a way that best aligns with their individual needs.



PLAN FOR FUTURE :

Based on our due diligence efforts, we have identified key actions to address priority risk areas. We expect these initiatives to raise awareness among both our suppliers and internal teams, while further mitigating risks within our prioritized categories. As part of our ongoing commitment to improvement, we will focus on the following areas and initiatives:

SUPPLIER FOLLOW-UP MEASURES

We continue to build on the following measures introduced last year, reinforcing our commitment to ethical procurement and responsible supply chain management.

- Evaluation of our procurement processes to ensure robust protocols are in place that support ethical and responsible purchasing practices.
- Consistent assessment human rights risks when selecting new suppliers and making key procurement decisions, ensuring that our policies remain current and aligned with best practices.
- Ensure effective risk management in our supplier segments and priority areas, strengthening oversight and proactive mitigation strategies.

OUR OWN OPERATIONS

We are committed to implementing a more structured approach to managing the risks associated with the use of global resources and project-based workloads. This includes actively monitoring potential risks, ensuring compliance with established working hours, and preventing overwork, particularly when utilizing resources located outside of Norway.



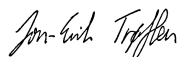
The Transparency Account has been approved by the Board of Directors of Nagarro AS on June 12th 2025.



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Annette Mainka
Chairperson of the board



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Thomas Aardal
Board member



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Jon-Erik Trøften
Board member