

Statement regarding compliance with the Transparency Act for Admincontrol AS

1 Introduction and background

The Norwegian Act on Business Transparency and Work with Fundamental Human Rights and Decent Working Conditions (the "**Transparency Act**") (*Norw.: Åpenhetsloven*) entered into force on the 1st of July 2022. The main purpose of the Transparency Act is to foster a higher level of transparency regarding the production of goods and the provision of services, especially relating to how businesses respect fundamental human rights and decent working conditions as part of these processes. For more information, see section 2 below.

Admincontrol is subject to the Transparency Act cf. section 2 and 3 of the Transparency Act. In light of this, Admincontrol is obligated to implement sufficient routines and mechanisms to assess, map and follow up possible breaches of fundamental human rights and/or decent working conditions in the supply chain.

This statement is an account of these first due diligence assessments performed by Admincontrol.

2 Description of the enterprise – Admincontrol AS

2.1 Organisation and operation

On the 13th of May 2025, Admincontrol became part of the Euronext Group and is 100 % owned by Euronext N.V.

Admincontrol is a company of 87 employees, divided by two offices in Norway. The company also has offices in Sweden, Finland, Denmark and Great Britain. Admincontrol is part of the

Euronext Group. Euronext N.V. operates the Euronext Group, as far as possible on an integrated basis, with business lines or functions run on a pan-European basis when it makes sense for efficiency and expertise reasons.

Admincontrol offers web-based solutions for secure and intuitive document sharing and collaboration on business-critical information. The solutions, Board Management Portal and Virtual Data Room, are available in all the markets where Admincontrol has offices and are used by both private and public companies of various sizes and across different industries

2.2 Guidelines and routines to handle actual and potential negative consequences for fundamental human rights and decent working conditions

2.2.1 Policies and guidelines

Admincontrol has adopted a policy regarding the Norwegian Transparency Act, applicable for all parts of the organisation. The policy establishes clear and uniform routines to ensure compliance with the Transparency Act.

The policy shall ensure that risks of actual and potential negative consequences on fundamental human rights and decent working conditions Admincontrol has contributed to or caused are mapped; that suitable and necessary measures are taken to limit and prevent the harmful effects of deviations, that structured processes are carried out to follow up measures and analyse the effect of implemented measures, that there are appropriate and good routines for communication with affected parties in the event of deviations, and that there are effective processes for recovery where Admincontrol has contributed to or caused actual negative consequences.

As a part of the Euronext Group, Admincontrol adheres to a range of sustainability-related commitments and policies. A comprehensive list of these can be found [here](#).

3 Carbon footprint

Admincontrol is committed to reducing its carbon footprint, both within the organisation and in collaboration with suppliers and partners. The company continuously tracks emissions resulting from its own operations, and reports on these annually. Furthermore, we actively work to identify and implement measures aimed at reducing greenhouse gas emissions.

4 Whistleblowing Channel

Euronext, via its [Whistleblowing Policy and Procedure](#), allows employees and third parties to report in confidence alleged breaches of the laws or Company policies, and protects anyone who reports in good faith, ensuring that they shall in no way be put at a disadvantage by the Company as a result of the report. The policy provides internal and external mechanisms to report unlawful and unethical behaviours.

5 The Due Diligence process (vendor and partner assessment)

Admincontrol has carried out due diligence assessments related to decent working conditions and fundamental human rights.

The assessments have primarily been divided into two processes:

- i. due diligence assessments directed towards Admincontrol internally, as well as towards business partners, and
- ii. due diligence assessments directed towards third party suppliers providing services to Admincontrol

5.1 The form and content of the due diligence assessment

5.1.1 Internal and business partners

The due diligence assessments directed towards Admincontrol internally, as well as towards business partners, have consisted of answering questionnaires; one for Admincontrol internally and one directed towards business partners used by Admincontrol.

The internal questionnaire for Admincontrol includes questions on how Admincontrol follows up and ensures compliance with obligations set out in the Norwegian Working Environment Act, as well as questions about routines and mechanisms to ensure that employees have an employment relationship that does not conflict with fundamental human rights and/or decent working conditions. In addition, internal policies and procedures relevant under the Transparency Act have been mapped.

An important document in this regard is [the Euronext Code of Business Conduct](#), which outlines the responsibilities of all employees at Admincontrol, as well as within the Euronext group, in relation to the Transparency Act. For instance, each company in the Euronext group is committed to treat all employees with honesty, fairness, and respect, and provide a safe and healthy working environment. In addition, abusive, harassing, or offensive conduct, whether verbal or physical, is considered unacceptable.

The examples cover derogatory comments based on a person's gender or racial or ethnic characteristics, and unwelcome sexual advances. Employees are directed to report such conduct when it occurs. Additionally, each company in the Euronext group is committed to provide all employees and others who are on company property with a safe and healthy work environment. Accordingly, all employees shall comply with all health and safety laws and regulations as well as company policies governing health and safety. All employees have a duty to immediately report accidents, injuries and unsafe equipment, practices or conditions to a manager or other designated person.

Admincontrol also has an external questionnaire directed towards business partners. The questionnaire consists of questions relating to internal guidelines and routines for equal

treatment of employees, working hours, wages and questions on collective agreements and freedom of association.

5.1.2 Employee training

Admincontrol requires all employees to formally confirm their commitment to comply with the company's Code of Conduct, which encompasses principles relating to anti-corruption, data protection, and the safeguarding of fundamental human rights. Such confirmation is also mandatory for all new employees as part of the onboarding process.

Feedback concerning the Code of Conduct is addressed on an individual basis, and proposed amendments are duly considered to ensure ongoing relevance and effectiveness. The annual confirmation process is subject to internal review, and aggregated compliance data is reported in Euronext's annual report.

5.1.3 Third party suppliers

The assessments directed towards third party suppliers providing services to Admincontrol follow a risk-based approach. A selection of suppliers has been subject to a more detailed risk classification and assessment based on the size and length of the contract, geographical conditions, industry and sector etc. The methodology employs a standardised scoring system, ranging from 1 to 5, with an incremental value, to calculate the likelihood and impact on the fundamental human rights and decent working conditions.

6 Risk, consequences and prioritisations

Based on the nature of Admincontrol's business as a software provider, we consider the risk of human rights violations in our value chain to be relatively low, and Admincontrol has not identified any actual negative impacts on fundamental human rights or decent working conditions in the assessment processes described above.

Admincontrol must still ensure that we implement adequate measures to prevent and mitigate any risks throughout our value chain due to the severity of the potential consequences associated with such violations.

Admincontrol will continue to actively work on fundamental human rights and decent working conditions, and considers the following areas important to prioritise and focus on:

- Energy consumption and greenhouse gas emissions
- Diversity, equality and inclusion
- Business ethics and anti-corruption
- Human rights
- Security and data privacy