

18. June 2025, Oslo

## Transparency Act Statement 2024

### 1. Introduction

The Norwegian Transparency Act, which governs companies' duty to promote fundamental human rights and decent working conditions, went into force on July 1, 2022. Questback AS is subject to the scope of this legislation.

Questback AS takes our social responsibility seriously and aim to contribute to a better and more sustainable society by being a responsible company for our employees, customers, suppliers, and shareholders.

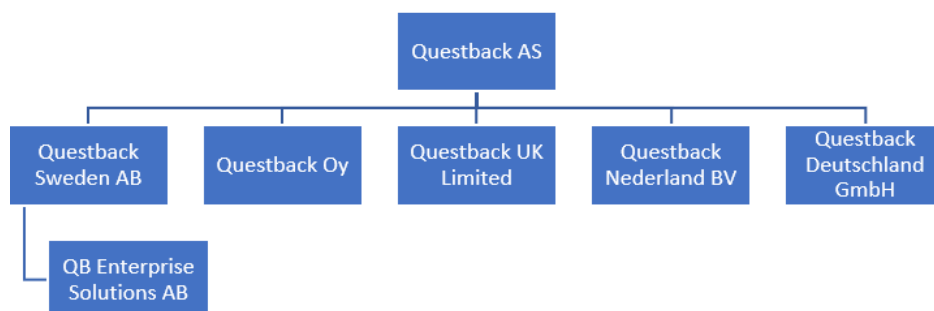
We are committed to ensuring respect for fundamental human rights and decent working conditions throughout our own operations and value chain. We work towards this by adhering to ethical guidelines, actively promoting sustainability, and complying with all applicable laws and regulations.

### 2. About Us

Questback was founded in Oslo, Norway in 2000. Since then, the company has grown to serve approximately 1,600 customers in more than 20 countries. We also have offices in Stockholm, Espoo, and Amsterdam. We provide software and advisory services for customer-, employee-, and market research.

#### 2.1 Our Structure

Questback AS is the group's headquarters, based in Oslo. The CEO is employed by Questback Sweden AB and reports to the board of directors.



## 2.2 What We Do

We help organizations make better decisions through insights and feedback. We provide digital solutions and advisory services that support customer-, employee-, and market insight.

## 3. Standards and Commitments

Questback sets clear expectations for ourselves and our suppliers to promote human rights, decent working conditions, and ethical business practices across the value chain. Our key principles include:

- **Compliance with laws and regulations:** We comply with all applicable laws and regulations in the markets in which we operate.
- **Diversity and non-discrimination:** We do not tolerate discrimination and are committed to diversity and equal opportunities.
- **Fair compensation:** Our employees receive equal pay for work of equal value.
- **Safety and development:** We promote a safe, inclusive, and growth-oriented working environment.
- **Health and safety:** We safeguard the physical, mental, and social well-being of our employees.
- **Respect for human rights:** We have zero tolerance for violations of human rights, both internally and across our supply chain.
- **Privacy and data security:** We ensure the privacy and security of all employees, customers, and partners.
- **Anti-corruption:** We do not tolerate any form of corruption or bribery.
- **Environmental responsibility:** We work continuously to reduce our environmental impact.

## 4. Due Diligence Assessment 2024

Questback conducted due diligence assessments in accordance with the requirements of the Transparency Act. The purpose of these assessments was to identify and mitigate any adverse impacts on human rights and working conditions in our supply chain.

### 4.1 Scope and Methodology

In 2024, Questback engaged with 230 suppliers across the group. We limited the scope of our assessment based on the following criteria:

- Annual procurement over NOK 100,000 (incl. VAT), to ensure we focus on suppliers where we have real influence.
- Regular use (one-off purchases were excluded).
- Risk evaluation based on industry, geography, and type of service/product.

After applying these criteria, 46 suppliers were selected and contacted for assessment via a questionnaire.

### 4.2 Results

We did not identify any actual or potential adverse impacts related to human rights or working conditions among our suppliers in 2024, based on the information provided by the suppliers and our internal evaluation framework. Consequently, no corrective measures were deemed necessary.

Questback has not yet established formal procedures for follow-up duties or action plans for high-risk suppliers; however, these are scheduled to be implemented in 2025.

## 5. What Happened in 2024?

In 2024, Questback conducted a comprehensive review of internal policies. As a result, several key policies were created or updated in line with objectives set in 2023:

- Supplier Code of Conduct
- Employee Code of Conduct
- Anti-Corruption Policy
- Human Rights Policy
- Sustainability Policy
- Whistleblowing Procedure

## 6. Whistleblowing and Integrity

In 2024, Questback implemented an external whistleblowing channel and internal procedures that allow employees and other stakeholders to report concerns regarding unethical behavior, such as corruption or other types of misconduct. All reports are initially handled confidentially by an independent third-party service before being passed on to HR in accordance with internal guidelines.

The purpose of this is to ensure employees receive the support and guidance they need if they suspect wrongdoing. All concerns are taken seriously and handled fairly and confidentially.

Information about our whistleblowing policy and reporting procedures is available to all employees via shared internal documents.

## 7. Plans for 2025

In 2025, we plan to:

- Implement formal routines for the establishment and follow-up of supplier relationships.
- Develop structured due diligence procedures for suppliers considered to have elevated risk.
- Evaluate and improve our internal routines and policies related to sustainability and responsible procurement.

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This statement is approved by the Board of Directors of Questback AS and is published on the company's website.

Inquiries related to the Transparency Act or our policies may be directed to:  
[post@questback.com](mailto:post@questback.com)

This statement has been prepared in accordance with §5 of the Norwegian Transparency Act and is valid as of June 2025.