

# Human Rights and Transparency Act Report 2022

## Background and purpose

This report has been prepared in accordance with the Transparency Act (Act on Companies' Transparency and Work with Fundamental Human Rights and Decent Working Conditions), which came into effect on July 1, 2022.

The report provides information on how our organization handles actual and potential negative impacts on fundamental human rights and decent working conditions in relation to the production of goods and provision of services. The report also includes an account of the due diligence assessment we have conducted in accordance with the law.

In this report, we first describe our organization and our value chain. Then, we account for the due diligence assessment we have conducted, including how we have identified risks, assessed severity and likelihood, implemented measures, followed up on the effectiveness, and communicated the results. Finally, we summarize our key findings and plans for further work on transparency and accountability.

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## About Convene Group

Convene Group AS is the parent company and the company's business is investment in wholly owned companies, primarily in Norway. The company also has investments in Scandinavia through its subsidiaries.

Through subsidiary company Convene AS (previously Melin Medical AS), a majority of the business is related to providing payment and administrative solutions to the health sector in Norway.

Convene specializes in providing payment solutions and administration systems that free up time that physicians and other health professionals spend on unnecessary administrative tasks. Convene's terminals and mobile payment solutions give patients the option of paying for the services they receive at the clinic in a simple and intuitive way. The company's invoicing solutions include complete systems for the administration of deductibles.

The subsidiary CrediCare AS is also an approved debt collection company. It is located in Oslo and Førde, Norway, and is a well-established provider of payment solutions and admin systems for the healthcare, dental, fitness and veterinary sectors. The Group also has debt collection services in Denmark and Sweden.

Subsidiary company Gordion AB is located in Halmstad, Sweden, and is a turnkey provider of any type of solutions to facilitate self-service, including hardware, software, installation, service and support. Gordion AB operates in 14 European countries. Convene Group AS' office is located in Oslo, Norway.

Convene Group delivers end-to-end solutions, directly integrated with leading professional systems, which ensure seamless payment and transaction management throughout Scandinavia. With our solutions, we handle all types of payments from mobile payment to invoicing, follow-up and financing. In this way, we ensure that all our customers are paid for the services they provide. We ensure ethical procedures, in a strictly regulated industry.

## Policy commitments

### HUMAN RIGHTS AND DECENT WORKING CONDITIONS

We are committed to respecting fundamental human rights and decent working conditions throughout our value chain. We consider this as an important responsibility towards our employees, customers, suppliers, business partners, society, and the environment. Therefore, we have established a system to identify, prevent, manage, and report any negative impacts on these rights and conditions within our organization.

### NON-DISCRIMINATION

The Group has a zero-tolerance policy for bullying, discrimination and harassment in the workplace and strongly urges all experience with or observations of this to be reported. There are particular protections against sexual harassment and harassment because of gender, ethnicity, religion, life views, disability, sexual orientation, gender identity and gender expression, under existing equality and discrimination legislation.

### PRIVACY

Secure and compliant handling of personal information is at the core of the Group's subsidiaries business. Consequently, privacy is an area of special focus, and to ensure this an internal control consisting of governing documents, operational procedures and controls are developed and implemented.

### Guidelines

In its HR policy and guidelines, the Group has introduced provisions aimed at preventing discrimination based on gender in matters such as salary, advancement and recruitment.

### Whistleblowing

Our whistleblowing procedures ensure the availability of anonymous and secure channels to report any misconduct. Our organization is committed to thoroughly investigate all reports of misconduct that are brought to our attention through the whistleblowing channels. We ensure that these cases are handled with the utmost seriousness and confidentiality.

## Risk assessment

In 2022, we have started by creating an overview of our own operations, suppliers, and business partners. We have categorized the entities by industry, geography, and type of business partner. Where appropriate and feasible, we have also gathered information about subcontractors. Our mapping is based on the information available to us, as well as known risks we have encountered in the past. Questionnaires are sent to service providers and suppliers based on country, location and existing information regarding the Transparency Act and ESG-reporting.

## EMBEDDING ACCOUNTABILITY IN THE COMPANY'S POLICIES

This involves establishing a policy framework that clearly expresses our company's commitment to respect human rights and decent working conditions and communicating it internally and externally.

In 2022, we have updated our responsible business conduct policies in accordance with the Transparency Act and the OECD Guidelines for Multinational Enterprises. The policies apply to our entire business, supply chain, and business partners. The policies include:

- How we will act responsibly in relation to human rights and decent working conditions throughout our value chain.
- Our expectations of accountability from our suppliers and business partners, and how we follow up on these expectations.
- Our plans for due diligence assessments, including how we identify, assess, manage, and report on actual and potential negative consequences.

The policies have been adopted by the board and embedded within the management. They have also communicated to all employees, suppliers, business partners, and stakeholders. The policies are available on our internal website and in our agreements.

We have also initiated dialogue with relevant stakeholders, such as employees, trade unions, customers, suppliers, business partners, civil society, and authorities, to understand the risks we face and how to address them. We have also explained in the policies how we prioritize in our due diligence assessments, i.e., why certain types of risks are considered more significant than others.

We are further committed to listening to and addressing any complaints we receive from affected stakeholders. We have a system in place to receive and handle complaints or inquiries from individuals or groups affected by our business or our suppliers or business partners. We also contribute to the effective resolution of any compensation claims.

We are aware that the policies may need to be adjusted or changed as we proceed with the assessment and implementation of measures, as well as when the risk changes. Therefore, we will regularly evaluate and update the policies based on our experience and feedback from stakeholders.

## IDENTIFYING AND ASSESSING ACTUAL AND POTENTIAL NEGATIVE CONSEQUENCES

This involves conducting a systematic assessment of risks and opportunities related to our company's activities, supply chain, and business partners, as well as evaluating the severity and likelihood of negative consequences occurring or persisting.

We have prioritized the most severe risks based on an assessment of severity and likelihood. We have used a matrix with four categories: low severity/low likelihood, low severity/high likelihood, high severity/low likelihood, and high severity/high likelihood. We have focused on the risks that fall into the last two categories.

The services in Convene and the subsidiaries do not imply any negative impact on human rights and decent working conditions.

We are in dialogue with our partners and suppliers and have asked for their status on human rights and decent work conditions when this information was not publicly available. So far, we have not detected any specific negative impact of these issues related to their services. But we are focusing with extra care on suppliers located in high-risk countries. They are few and small in terms of cost, except one software vendor located in a high-risk country. We have no reason to expect any violations of human rights or working conditions other than location. Further, we are focusing specifically on suppliers down in the chain that are manufacturing computer hardware.

We will regularly update our mapping and assessment as we receive new information or as the risks change. We will also involve relevant stakeholders in our process to gain their perspectives and input.

## IMPLEMENT MEASURES TO PREVENT OR MITIGATE NEGATIVE CONSEQUENCES

This involves prioritizing the most severe risks, designing, and implementing effective measures tailored to our company's context and influence, and involving relevant stakeholders in the process.

We have implemented appropriate measures to stop, prevent, or mitigate the negative consequences we have identified in our mapping and assessment. We have based our approach on our relationship to harm or potential harm, i.e., whether we have caused, contributed to, or have a direct connection to the negative consequences. The closer we are to harm, the greater responsibility we have, and the more comprehensive measures we need to implement.

We have three levels of measures:

- Prevent negative consequences for human rights and decent working conditions: This means implementing measures before harm occurs.
- Limit negative consequences for human rights and decent working conditions: This means implementing measures that reduce the extent of harm caused by a past or existing negative consequence.
- Cease activities that contribute to negative consequences for human rights and decent working conditions: This could involve, for example, terminating a contractual relationship.

Some examples of measures we have implemented or plan to implement are:

- Training our own employees and subcontractors in responsible business practices, for example, through courses, guidance, and follow-up.
- Implementing improved procedures for purchasing.
- Prequalifying our suppliers through requirement specifications, certifications, and audits.
- Consolidating our suppliers means using as few suppliers as possible to have better oversight and control.
- Establish a Code of Conduct regarding human rights and decent working conditions that Convene Group and our suppliers must adhere to.
- When new supplier contracts are signed the supplier has to accept the terms in our Code of Conduct as part of the agreement.
- Getting to know our suppliers and building long-term relationships, for example, through regular dialogue, visits, and collaboration.

## Going forward

We will regularly monitor the effectiveness of the measures to see if they have the desired impact. We will also adjust or modify the measures as needed. We will involve relevant stakeholders in our process to obtain their perspectives and input.

### **FOLLOW UP ON THE EFFECTIVENESS OF THE MEASURES**

This involves monitoring and evaluating whether the measures have the desired impact and making adjustments or changes to the measures as necessary.

### **COMMUNICATE HOW THE COMPANY ADDRESSES NEGATIVE CONSEQUENCES**

This entails being transparent and providing an account of the due diligence assessment in a report published on the company's website, as well as responding to information requests from the public.

### **ENSURE ACCESS TO GRIEVANCE AND REMEDIATION MECHANISMS**

This involves having a system in place to receive and handle complaints or inquiries from individuals or groups affected by the company's activities and contributing to the effective redress of any claims for compensation.

## DEFINITIONS

To ensure a clear understanding of the terms used in this report, we provide the following definitions and clarifications:

- *Fundamental Human Rights: Fundamental human rights encompass the basic rights and freedoms to which all individuals are entitled, regardless of their nationality, race, gender, religion, or any other characteristic. These rights include, but are not limited to, the right to life, liberty, equality, non-discrimination, and freedom of expression.*
- *Decent Working Conditions: Decent working conditions refer to the fair and humane treatment of workers in all aspects of their employment. This includes factors such as fair wages, reasonable working hours, safe and healthy working conditions, freedom of association, and the elimination of forced labor and child labor.*
- *Value Chain: The value chain represents the full range of activities involved in the production and delivery of goods and services, from the sourcing of raw materials to the final consumption by customers. It encompasses various stages, such as production, distribution, marketing, and after-sales service.*
- *Due Diligence Assessment: A due diligence assessment is a systematic process of identifying, preventing, and mitigating risks and negative impacts associated with a company's operations. It involves evaluating the potential human rights and labor rights risks within the value chain, determining their severity and likelihood, and implementing measures to address them effectively.*
- *Risks: Risks refer to potential adverse events or circumstances that may result in negative impacts on fundamental human rights or decent working conditions. These risks can arise at any stage of the value chain and may be influenced by factors such as supply chain complexity, geographical location, or the nature of the industry.*
- *Severity and Likelihood: Severity refers to the potential harm or negative consequences that could arise from a particular risk. Likelihood refers to the probability or chance that the risk will occur. Assessing severity and likelihood helps prioritize and allocate resources to address the most significant risks.*
- *Measures: Measures are actions or initiatives implemented to address identified risks and prevent or mitigate negative impacts. These measures can include adopting policies and procedures, conducting supplier audits, providing training and capacity-building programs, or engaging in collaborative initiatives with stakeholders.*
- *Follow-up: Follow-up refers to the ongoing monitoring and evaluation of the effectiveness of the implemented measures. It involves tracking progress, identifying any gaps or areas for improvement, and making necessary adjustments to ensure continuous improvement in the management of human rights and working conditions.*
- *Accountability: Accountability refers to the obligation of an organization to take responsibility for its actions, policies, and impacts on society and the environment. It involves being transparent, responsive to stakeholders' concerns, and taking appropriate actions to address any adverse impacts identified.*