

Transparency Act Due Diligence Report 2024

Introduction.

This due diligence report is published in accordance with the Norwegian Transparency Act (Åpenhetsloven) §5 and outlines the measures undertaken by Neptune Software to ensure respect for fundamental human rights and decent working conditions across our operations, supply chains, and business partnerships.

The Transparency Act entered into force on 1 July 2022 and requires large enterprises operating in Norway to carry out and publicly account for human rights due diligence in line with the OECD Guidelines for Multinational Enterprises. This report provides an overview of Neptune Software's organizational structure, internal policies, and due diligence processes, as well as our assessment of actual and potential adverse impacts related to human rights and working conditions. It further describes actions taken and planned to prevent, mitigate, or remedy such impacts.

This publication covers the period from 1 January 2024 to 31 December 2024 and has been approved by the company's leadership team in line with applicable legal and corporate governance requirements. The report is made publicly available via our website in accordance with the Act's disclosure obligations.

General Information.

Neptune Software is a global software company specializing in enterprise application development and No-/Low-Code solutions for SAP and non-SAP systems. The company's core product, Neptune DXP (Digital Experience Platform), enables organizations to modernize, extend, and automate business processes through low-code/no-code tools while maintaining full SAP integration and security standards.

Headquartered in Oslo, Norway, Neptune Software operates across EMEA, the Americas, and the Asia-Pacific regions, serving customers in industries such as manufacturing, utilities, public sector, retail, logistics, and financial services. The company has a global organizational structure, with regional offices providing sales, solution consulting, customer success, and technical support.

Neptune Software works both directly with customers and through a network of certified partners to deliver and support solutions worldwide.

Approach to OECD Due Diligence Principles.

Neptune Software's approach to human rights due diligence is informed by the principles of the OECD's six-step model for responsible business conduct. The company has established processes that reflect key elements of this framework, appropriate to its size and risk profile. This approach ensures our due diligence is systematic, continuous, and proportionate to identified risks.

Governance and Responsibility.

The General Counsel oversees compliance with the Transparency Act, supported by the HR and Compliance teams. The Executive Leadership Team reviews and approves the due diligence statement annually. Each department is responsible for integrating human rights and ethical considerations into their respective operations and supplier management processes.

Policies and Governance for Handling Actual and Potential Adverse Impacts.

Neptune has established a comprehensive set of policies that reflect its commitment to fundamental human rights, decent working conditions, and ethical business conduct. These include the following key policies:

- Code of Conduct
- Employee Handbook
- Diversity, Equality, and Inclusion Policy
- Health, Safety, and Environment Policy
- Whistleblowing Policy
- Anti-Bribery & Anti-Corruption Policy
- Third-Party Code of Conduct
- Responsible Business Partner Policy
- Information Security Policy (ISO 27001:2022-aligned)
- Privacy Policy (GDPR-compliant)

All policies are publicly available through the [Neptune Software Trust Center](#).

Actual Adverse Impacts and Significant Risks Identification.

Neptune Software conducts risk-based due diligence across its operations and supply chains. Potential risks are assessed based on geography, industry, and nature of services provided. To date, no actual adverse human rights impacts have been identified in Neptune Software's operations or supply chain. Nonetheless, we remain vigilant in identifying potential risks related to third-party labor conditions, data privacy, and cybersecurity.

Measures Implemented to Prevent and Mitigate Risks.

We maintain a continuous improvement approach to responsible business practices. Our supplier due diligence process includes onboarding screenings, annual reviews, and ongoing monitoring of high-risk partners. No indicators of forced labor, child labor, or discrimination have been identified. Preventive measures include employee training, enhanced communication with suppliers, and independent audits when warranted.

Reporting Mechanisms.

Employees and business partners may report suspected breaches of laws or company policies via Neptune Software's confidential whistleblower system or email at privacy@neptune-software.com. Reports may also be made to HR, a direct manager, or the Legal Department. All reports are handled confidentially, investigated promptly, and whistleblowers are protected from retaliation. External stakeholders may request information under the Transparency Act by contacting Neptune Software via our website.

Conclusion and Approval.

This statement has been reviewed and approved by Neptune Software's Executive Leadership Team, in accordance with section 5 of the Norwegian Transparency Act. It will be reviewed and updated annually to reflect ongoing due diligence and risk management improvements.

Oslo, 30 June 2025

Andreas Grydeland Sulejewski
CEO