Reporting according to the Transparency Act for Ibexa AS – 2025

Introduction

The purpose The Norwegian Transparency Act (Åpenhetsloven) is to promote companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. The Act requires businesses to conduct due diligence assessments in line with the OECD's guidelines for Responsible Business Conduct. This includes mapping, assessing, and implementing measures to address negative impacts. A key aspect of the law is to ensure public access to information on how businesses handle actual and potential negative consequences for fundamental human rights and decent working conditions

Ibexa AS, including its subsidiaries (Ibexa Group), is subject to the Norwegian Transparency Act, which requires us to conduct due diligence assessments and report on our efforts to uphold and respect human rights and decent working conditions. For the remainder of this report, Ibexa AS / Ibexa Group will be referred to as “Ibexa”. Responsibility for compliance with the Act is anchored in the board of directors. This report outlines how Ibexa complies with the Transparency Act, detailing our operations, due diligence processes, and measures to address risks. This report covers the period from January 1 to December 31, 2025.

Ibexa’s structure and business operations

Ibexa is a software development company and specialises in providing a cloud-based Digital Experience Platform (DXP) designed to facilitate digital transformation. The platform offers features such as headless content management, e-commerce solutions, personalisation, and flexible development capabilities. This enables clients to implement new sales strategies and enhance customer experiences.

Ibexa has a workforce of 94 employees as of 31.12.2025. In November 2021, the company was acquired by QNTM Group, a move aimed at strengthening its position in the digital experience market. Ibexa has an international presence and market reach with headquarters in Oslo and additional offices across Europe, USA and Japan. The report covers the entire Ibexa Group, including Ibexa AS (NO), Ibexa SARL (FR), Ibexa Ltd (UK), Ibexa GmbH (DE), Ibexa Netherlands B.V. (NL), Ibexa Nordics AS (NO), YouChoose GmbH (DE), Ibexa Poland Sp. Z.o.o (PL), Ibexa Inc. (US), Ibexa Iberian SL (ES) and Ibexa Japan K.K (JP). The group operates across global markets providing digital solutions tailored to a wide range of business needs.

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Our approach to human rights management and workplace policies

Ibexa focuses on promoting fundamental human rights and decent working conditions in the production and delivery of services, in line with the Norwegian Transparency Act. We continuously work to ensure compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
Ibexa's suppliers and business partners play a key role in enabling our business operations. We value relationships built on trust and openness, where vendors and business partners act ethically, maintain financial integrity, follow applicable laws and regulations, and uphold international standards, including respect for human rights.

We are also committed to ethical practices, inclusivity, and decent working conditions within our own organisation. Our employees are expected to follow the Ibexa's policies on sustainability and ESG, anti-bribery and corruption, and the prevention of sexual harassment and discrimination, ensuring alignment with our ethical and responsible business standards.

Competent, satisfied, and engaged employees are our most important resource. Ibexa values diversity in its workforce, hires individuals from various countries and cultures, and ensures a recruitment policy that reflects this. We offer competitive terms across all job categories and facilitate a healthy and sustainable work-life balance. The board assesses that there is no discrimination within the company and that cultural diversity is managed effectively.

Employees actively take part in various projects aimed at promoting open-mindedness and community engagement. We have a company-wide commitment to these values, and we have a core team dedicated to corporate responsibility, supplemented annually by volunteers from different departments.

Ibexa has a whistleblowing channel for employees, former employees, customers, and suppliers. It allows reporting of misconduct or breaches of human rights and fair working conditions. Reports can include violations of local or EU/EEA rules or Ibexa's policies. The channel ensures confidential and anonymous communication. An external partner provides the tool to protect anonymity.

Due Diligence Process (DDP)

Suppliers and business partners

As part of the DDP, we have created an overview of all our suppliers and business partners engaged in 2025. Each supplier is evaluated for the risk they may pose to fundamental human rights or decent working conditions. To identify potential negative risks in our supply chain, we have followed a structured process. As a first step, we have established an overall risk profile by assessing three key parameters for all suppliers: purchase volume, country risk and product risk.

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Country risk was assessed using the following indices for 2025:

- Transparency International's Corruption Perception Index (CPI)
- Environmental Performance Index (EPI)
- The Global Gender Gap Index
- ITUC Global Rights Index

Product risk was evaluated based on DFØ's* overview of product categories with a high risk of violating fundamental human rights in the supply chain. Our own experiences with the suppliers are also considered in the assessment.

Based on supplier data extracted from our ERP system, we have summarised a list of the company's direct suppliers and business partners with transactions exceeding NOK 100 000. Ibexa works with 45 direct suppliers and business partners who had transactions exceeding this amount during the reporting year. These suppliers has business operations in various countries, including:

Country	Nr of Vendors
Norway	1
Nordics	1
Germany	21
Spain	3
Poland	3
QNTM Poland	6
France	5
UK	2
USA	3
	45

Ibexa's suppliers are spread across multiple countries, with the largest concentration in Germany, Spain and Norway. While several of these countries are generally considered lower risk in terms of human rights and working conditions, we recognise that some regions present higher risks. We address these risks through our commitment to compliance and responsible business practices. In line with the Transparency Act, we expect our suppliers to operate in compliance with applicable laws and uphold

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internationally recognised standards for ethical business conduct, human rights, and environmental responsibility

As the majority of our suppliers provide software-based products and services, the overall product risk is lower than for physical goods. However, we recognise that risks related to labour rights, data privacy, and responsible business conduct can still exist within software supply chains. Our assessment indicates that the highest risks concerning human rights and decent working conditions are linked to the procurement of ICT equipment, electronics, lighting, and office supplies. To minimise any potential adverse effects, Ibexa prioritises repairing and reusing these items whenever possible. Additionally, we closely monitor our suppliers and set clear requirements for documentation.

Based on the overall risk assessment, we have selected a smaller group of suppliers to focus on—those with higher product- and country-related risks, as well as those with the largest financial transactions. We have sent direct inquiries to these vendors to understand their approach to human rights and responsible business conduct. We are in the process of reviewing the responses and will assess whether further actions, including a more detailed review of selected suppliers, are necessary. The goal is to identify potential or actual negative impacts and determine appropriate follow-up measures. This work is part of our ongoing effort to ensure responsible sourcing and transparency in our supply chain.

Own operations

Ibexa prioritises creating a workplace where all employees feel comfortable, regardless of background, religion, orientation, or personal circumstances. We actively work to support a healthy balance between work and personal life. Regular employee evaluations and surveys help us maintain a positive work environment. The latest employee survey, conducted in 2024, indicates that the work atmosphere at Ibexa is generally perceived as balanced, with areas of both strength and potential improvement.

Given this, the risk related to decent working conditions and fundamental human rights within our own operations is considered low. Our primary focus is therefore on our suppliers. In our industry, the greatest risk is generally associated with suppliers providing goods and services that support our daily office operations, such as the procurement of electronic equipment and similar items.

Results from the Due Diligence process

During the reporting period, we have not identified any violations of human rights or decent working conditions within our operations or supply chains. However, we have not progressed far enough in our assessment to identify the potential risks associated with the subcontractors of our suppliers.

Actions to Mitigate Risks

To minimise any negative impact, we aim to repair and reuse materials whenever possible. Additionally, we monitor our suppliers closely. In cases where we are uncertain about how a supplier affects their surroundings, we will request clarification and documentation. If a supplier cannot adequately document their adherence to fundamental human rights and

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decent working conditions, this may have consequences for their contract with us. In standard cases, we will first seek to influence the supplier to minimize risks and address any violations.

Monitoring and Evaluation of Measures

We are committed to continuously monitoring the implementation and outcomes of the measures we have introduced. Responsibility for ensuring compliance with the Transparency Act, including the execution and evaluation of actions taken, rests with SVP Operations. At least once annually, we will conduct audits to review achieved results and update our assessments. Planned and ongoing measures will be proportionate to the current risk landscape.

Future focus areas

Our efforts aim to promote corporate responsibility, reduce risks, and uphold ethical and sustainable practices across all operations. Transparency and accountability remain core principles guiding our work, and we are committed to continually improving our processes to meet these objectives.
During the reporting period, we have not identified any violations of human rights or decent working conditions within our operations or supply chains. However, we remain committed to continuous improvement in our processes. Should any adverse impacts be identified in the future, we will take immediate and transparent action to address them, implement appropriate remedies, and update our policies and procedures accordingly.

In 2025, we will continue working toward our goal of achieving greater transparency, traceability, and integrity across our supply chain. To support this long-term goal, our focus will be to:

- Enhance internal competence in our company regarding sustainability and responsible procurement practices. We will increase awareness among employees and management about human rights governance processes. This will strengthen our ability to address risks both internally and externally.
- Review and update our existing policies to align with the Transparency Act requirements. New guidelines will be introduced where necessary to address identified gaps.
- Further develop the due diligence assessment based on the experiences we gain.
- We plan to map a broad range of our suppliers and business partners and will conduct ongoing assessments of risks related to fundamental human rights, decent working conditions, the environment, and sustainability.

As part of the QNTM Group's ongoing sustainability work, a double materiality assessment (DMA) is planned. While no timeline has been established, the assessment is expected to provide valuable insight into sustainability-related risks and opportunities across the value chain and further strengthen Ibexa's sustainability efforts.

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For Inquiries **regarding Ibexa's** compliance with the Norwegian Transparency Act, please contact transparency@Ibe a.co.

CEO *of* Ibexa Oslo, 30.06.2026

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