



XPLORA'S GUIDELINES FOR RESPONSIBLE BUSINESS CONDUCT WITH THE TRANSPARENCY ACT

Xplora Technologies AS and its subsidiaries (hereafter referred to as "Xplora") are committed to responsible business conduct in accordance with the Transparency Act. The purpose of the Transparency Act is to promote respect for fundamental human rights and decent working conditions in companies that produce goods and provide services. It also seeks to ensure public access to information about how companies address adverse impacts on fundamental human rights and decent working conditions. This policy outlines how Xplora embeds and conducts due diligence assessments in line with the provisions in the Transparency Act.

1. THE BOARD OF DIRECTOR'S REVIEW AND AUDIT

The Board of Directors of Xplora shall review Xplora's routines regularly. The CEO is responsible for planning and presenting Xplora's routines to the Board of Directors for review on a regular basis.

Additionally, the CEO shall conduct an annual review of the work Xplora's has conducted, the identified findings and implementation of measures etc. The annual review is a matter of orientation for the Board of Directors.

The CEO shall assess whether there is a need, in addition to the annual review, to involve the Board of Directors further in matters related to the Transparency Act.

2. ANNUAL REPORT

The Board of Directors approves the annual report for Xplora's due diligence assessments and the results of these, hereunder the publication of the annual account. The account shall be updated and published no later than 30th June each year and otherwise in case of significant changes to Xplora's risk assessments.

3. DUE DILIGENCE ASSESSMENTS

Xplora shall conduct due diligence assessments annually, covering its own activity, suppliers and business partners' activity.

The due diligence assessments shall be conducted for all of Xplora's products and services and be reasonable and relevant to identify impacts of, or risk of breach of fundamental human rights and decent working conditions.



4. POSSIBLE MEASUREMENTS

Findings identified through the due diligence assessments shall result in an evaluation of measures that may be relevant and appropriate to implement. The measures shall be suitable to cease, prevent or mitigate adverse impacts on fundamental human rights and decent working conditions.

The effect of the measurements shall be evaluated.

5. NOTIFICATION CHANNEL

Xplora has established a grievance mechanism (compliance@xplora.com) for reporting of any potential adverse impacts on human rights and decent working conditions.

6. INFORMATION AND TRAINING

Xplora shall ensure that information about its work in line with the Transparency Act is available for its employees, suppliers and business partners and the general public. The information shall be adapted to external parties and Xplora's employees.

Xplora shall ensure that its relevant employees are trained regularly in the Transparency Act, the guidelines and its ongoing work ensuring compliance with the Act. Participation in such training shall be documented.

7. EMBEDDED RESPONSIBLE BUSINESS CONDUCT

The Board of Directors of Xplora approves this policy and places the responsibility of the work to be conducted to ensure compliance with the Transparency Act. Xplora is committed to promote the respect of human rights and decent working conditions throughout its operations and will continue to assess and improve its work in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for MNEs and Responsible Business Conduct.

The Board of Directors, 11.05.2023

Tore Engebretsen

Tore Engebretsen
Chairman of the board

Harald Fr. Hodne Ulltveit-Moe
Board member





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