

Human Rights and Transparency Act Report 2023

Background and purpose

The Norwegian Transparency Act, effective from 1 July 2022, aims to ensure that enterprises respect fundamental human rights and maintain decent working conditions in their production and services.

Convene AS is comprised by the Norwegian Transparency Act and is therefore obliged to publish an annual human rights statement. This report applies to the reporting period 1 January to 31 December 2023 and provides information on how our organisation 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.

In this report, we first describe our organisation 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 summarise our key findings and plans for further work on transparency and accountability.

For questions about this report or its contents, please contact: info@convene.no

Policy for handling requests of information

Convene's CEO bears the overall responsibility for making sure that our company operates in an ethical and legal manner. The legal department is responsible for managing and overseeing all incoming information requests.

Incoming requests will be logged and handled according to our internal procedures, and necessary information will be provided within three weeks upon receiving the request.

About Convene

Convene specialises in payment solutions that free up time that physicians and other health professionals spend on unnecessary administrative tasks and give patients the option of paying for health services in a simple and intuitive way.

We deliver end-to-end solutions, directly integrated with leading professional systems, which ensure seamless payment and transaction management. We handle all types of payments from mobile payment to invoicing, follow-up and financing. Our invoicing solutions include complete systems for the administration of deductibles.



COMPANY STRUCTURE

Convene Group is the parent company, that invests in wholly owned companies, primarily in Norway. The company also has investments in Scandinavia through its subsidiaries.

Most of our business is done through subsidiary Convene AS, that provide payment and administrative solutions to the health sector in Norway. The group also operates solutions in Sweden and Denmark.

At the beginning of 2024, Convene Collection AS and CrediCare were merged. The entities are responsible for the collection of monetary claims in Norway. The Group also offers debt collection services in Denmark and Sweden.

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.

Our 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. A policy framework that clearly expresses our company's commitment to respect human rights and decent working conditions and communicating it internally and externally has been established.

NON-DISCRIMINATION

We have a zero-tolerance policy for bullying, discrimination and harassment in the workplace, whether this relates to gender, ethnicity, religion, life views, disability, sexual orientation, gender identity and gender expression, or the like. The Group has introduced provisions aimed at preventing discrimination based on gender in matters such as salary, advancement and recruitment in its HR policies.

PRIVACY

Secure and compliant handling of personal information is at the core of our business. Data privacy is an area of special focus, and an internal control system consisting of governing documents, operational procedures and controls have been developed and implemented.

EMBEDDING ACCOUNTABILITY IN THE COMPANY'S POLICIES

The Group have established guidelines regarding ethical business conduct ('Code of Conduct'), in accordance with the OECD Guidelines for Multinational Enterprises. The guidelines were updated in 2023 and approved by the Board on 27.06.2024. The guidelines apply to our entire business, supply chain, and business partners and contain information such as:

- How we will act to uphold human rights and decent working conditions throughout our value chain.
- Our expectations towards 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.

Employees can access the guidelines through our internal systems. In 2024, we will improve internal communication regarding the guidelines, and consider adding them as attachments to contracts with suppliers and business partners.

WHISTLEBLOWING

We keep an ongoing dialogue with relevant stakeholders, such as employees, trade unions, customers, suppliers, business partners, civil society, and authorities, to understand potential risks and how to address them. We are committed to listening to and addressing any complaints we receive from affected stakeholders and have established a system for receiving and handling complaints.

Our whistleblowing channel ensure the availability of anonymous and secure reporting of any misconduct. We are committed to thoroughly investigating all reports that are brought to our attention and all cases are handled confidentially.

We have not received any reports during 2023.

Risk assessment

We regularly conduct risk assessments relating to our operations, evaluating the severity and likelihood of negative consequences occurring or persisting. For this exercise, we rely on publicly available information (e.g. through the supplier / business partner's own website) and information gathered directly from our suppliers and business partners through email or questionnaires.

We follow a systematic approach where suppliers and business partners are categorised by industry, geography, and type, and then scored according to actual or potential risks. Where appropriate and feasible, we are also looking into known subcontractors.

We are primarily focusing on suppliers located in high-risk countries, and on suppliers manufacturing computer hardware as this industry is often associated with a higher risk.

RESULTS

The Group have approximately 350 suppliers, of which 25% have been assessed based on their contract value (above 100,000 NOK).

Most of our suppliers are small IT companies / consultants that operate in countries where the risk of human rights breaches is considered to be low (Norway and Ireland). One supplier (software vendor) was located in Sri Lanka, but no actual risk was identified during the assessment.

We have not yet detected any specific negative impact on human rights and decent working conditions in our supply chain. We will regularly update our mapping and assessment as we receive new information or as the risks change.

Measures to prevent or mitigate negative consequences

We have implemented several measures to stop, prevent, or mitigate the negative consequences we have identified in our assessment.

Our approach is based on our ability to harm or potential cause harm. The closer we are to harm, the greater responsibility we have, and the more comprehensive measures we need to implement:

- 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:

- Hire a person responsible for procurement, that will ensure the necessary follow-up of our suppliers and business partners and implement improved procedures for purchasing, including pre-qualifications and audits (process initiated in 2023).
- Established a Code of Conduct, that include information about human rights and decent working conditions. The Code of Conduct has been developed, approved by the Board and published on our website. New suppliers will need to accept the terms in our Code of Conduct as part of the agreement. Employees will receive information about the Code of Conduct and where to find it. Training is in planning and will be conducted during 2024.
- Consolidating our suppliers i.e. using as few suppliers as possible to have better oversight and control. This will also help us get to know our suppliers and building long-term relationships.

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 and communicate with them in an open and transparent way about how our company address negative consequences. This also include providing an account of the due diligence assessment and responding to all incoming requests.

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.*