

THE TRANSPARENCY ACT – ANNUAL REPORT – 2024

DXC TECHNOLOGY NORGE AS

1. INTRODUCTION

This report has been prepared in accordance with the Norwegian Transparency Act of 18 June 2021 (the “Transparency Act”) and summarizes the policies and procedures in DXC Technology Norge AS (the “Company” or “DXC”) with respect to safeguarding human rights and decent working conditions.

This is the second annual report from the DXC on Transparency. DXC has a financial year from 1 April to 31 March. This report is based on the year ending on 31 March 2024 referred to in DXC as the financial year 2024. DXC is currently in financial year 2025.

DXC Technology Norge AS and Enterprise Services Norge AS were merged into DXC Technology Norge AS as of 01 March 2024.

DXC is part of the DXC-group. DXC Technology’s sole shareholder is DXC Technology Danmark A/S.

2. PRESENTATION OF THE COMPANY

DXC Technology Norge AS (“DXC”) assists global companies run their mission-critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private and hybrid clouds.

DXC does not manufacture any hardware, and our core activities are typically performed by a highly skilled and specialist workforce. This applies also to the types of activities that DXC procures, such as software development.

The general manager of DXC is Espen Olsen. DXC has 167 employees.

DXC Technology board of directors consists of:

1. Robbert Wentink, chairman
2. Ernesto Lopez Pino, board member
3. Espen Olsen, board member, managing director
4. Felora Ghods Mofidi, board member
5. Per Andor Holmquist, board member
6. Fredrik Arndal, board member
7. Oddny Ringheim, board member
8. Einar Gruben, deputy board member (varamedlem)
9. Bjarte Hodnekvam, deputy board member (varamedlem)

3. THE TRANSPARENCY ACT

The purpose of the Transparency Act is to increase knowledge and awareness among businesses regarding decent working conditions and fundamental human rights in connection with the

production of goods and the delivery of services throughout the supply chain. Compliance with the law is based on a principle of proportionality and risk assessment. As part of fulfilling the purpose of the Act, the public must be given access to information about what businesses do to ensure decent working conditions and basic human rights in the business itself and the business's supply chain. Information must also be provided on how businesses handle any negative consequences for decent working conditions and basic human rights.

DXC falls within the scope on the Act. As the act is a Norwegian legal requirement, it is required that the Norwegian legal entity has a process and publish its own report based on the risk assessment for the supply chain to the Norwegian legal entity.

However, the obligations following from the Act is to a large extent covered by the measures taken by DXC globally. The account in what follows will therefore refer to and base its assessments on routines that have been developed globally.

4. THE COMPANY'S WORK WITH THE ACT

4.1 Responsibilities

DXC wants to contribute to fulfilling the UN's Sustainable Development Goals (SDGs) on, among other things, decent work and economic growth, and on responsible consumption and production.

The Board of Directors in DXC (the "Board") has the overall and oversight responsibility of the management of the company, including oversight of risks related to adverse impact on human rights and decent working conditions.

On 30 June 2023 the Board nominated a role within DXC as the operative Transparency Act Responsible, which includes an internal instruction for the role. The Transparency Act responsible remains the same employee. The role as Transparency Act Responsible includes a primary responsibility for replying to requests for information pursuant to the Transparency Act, and for initiating and preparing risk assessments in accordance with the Transparency Act. If any need for mitigation is found, the Transparency Act Responsible shall inform the Board, who will be responsible for assessing the mitigation measures.

4.2 Requests for information

Information about the Transparency Act has been posted on the company's website. General information has been posted on how the company complies with the Act, and how the company can be contacted for questions about the Act. An email address for inquiries has been posted on the website.

If questions or other information come in that indicate that action is required, the board will take the necessary measures to address the possible issue.

4.3 Policies and procedures

DXC prohibits all forms of slavery, human trafficking, forced labor and child labor within our global business and our supply chain partners' companies. DXC globally has developed and implemented procedures and policies related to the Transparency Act.

The policies and procedures covering the areas that the Act is intended to protect include:

- DXC Modern Slavery Statement
- DXC Human Rights Statement
- DXC Responsible Supply Chain Principles
- DXC Code of Conduct

All documents mentioned above are published on DXC.com and they apply to everyone in the DXC group. The documents have also been translated into Norwegian.

4.3.1 Modern Slavery Statement

The Modern Slavery Statement reflects DXC’s aspirations and efforts to be a principled and responsible corporation, in line with our values. We refer to the latest statement dated 22 September 2023. Our environmental and social efforts align with the UN Sustainable Development Goals (SDGs). We focus on the following ones: UN SDG 3 (good health and well-being), UN SDG 4 (quality education), UN SDG 5 (gender equality), UN SDG 7 (affordable and clean energy), UN SDG 8 (decent work and economic growth), UN SDG 12 (responsible consumption and production) and UN SDG 13 (climate action).

4.3.2 Human Rights Statement

The DXC Human Rights Statement was developed in accordance with the tenets of the United Nations (UN) Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights. We define our human rights commitments in our Code of Conduct and our Responsible Supply Chain Principles. DXC’s Human Rights Statement confirms our key commitments and principles and provides the framework for our other statements. The latest Human Rights Statement is published in 2024.

4.3.3 Responsible Supply Chain Principles

The DXC Responsible Supply Chain Principles speak to the commitments we make to our customers, and the relationships we build, based on trust and personal responsibility. They are part of our framework of standards for conducting business. DXC expects suppliers to adhere to relevant national, regional and international laws and standards.

The current Supply Chain Principles is published in 2024.

New and existing suppliers must accept DXC Responsible Supply Chain Principles when entering into a new agreement. DXC also offers training on Supply Chain Transparency to all employees.

4.3.4 Code of Conduct

DXC launched a new Code of Conduct on 28 March 2024. This Code of Conduct applies to all DXC employees, directors, officers and executives, as well as subsidiaries and affiliates, business partners and suppliers, agents, and other representatives. The Code reflects our values and describes our company policies for appropriate business conduct. The focus is to inspire and guide all employees to do the right thing and “Deliver Excellence”.

The code is available in the language of each of countries in which DXC operates, including Norwegian language. All managers and employees can seek assistance from “DXC Integrity” through the SpeakUp Line to report or get guidance on ethical issues.

(<https://secure.ethicspoint.com/domain/media/en/gui/32161/index.html>)

DXC requires all employees to complete our mandatory Code of Conduct training annually. In the latest period, FY 2024 ,100% of DXC colleagues completed the training issued on 11 January 2024 and all completed by the end of March 2024

4.4 Mapping

4.4.1 Internal compliance

DXC has existing guidelines that cover several of the purposes of the Transparency Act.

DXC has mapped its own operations by reviewing agreements, routines, policies and systems, such as employment contracts, ethical guidelines and timesheets for working hours, etc. Furthermore, investigations have been carried out to see whether this is practiced and followed.

We have reviewed our guidelines and contracts, to ensure accountability and decent conditions in our own business, but also to ensure the same with our suppliers and partners. DXC is well equipped to comply with the obligations imposed by the Transparency Act.

In our commitment to ensuring no modern slavery exists in our own operations, DXC proactively undertook an internal audit to identify any potential cases among our employees in 2024.

Our business operations and activities are considered low risk for modern slavery, and we are committed to minimizing the risk of all forms of forced labor and human trafficking within our global business.

The review shows that DXC complies with the provisions of the Working Environment Act and other relevant regulations in an employment relationship. Nor have any forms of human rights violations been uncovered in the business.

4.4.2 Supplier compliance

DXC have routines for ensuring that suppliers and subcontractors safeguard fundamental human rights and decent pay and working conditions.

As part of our due diligence, DXC conducts an annual Supplier Survey ("Survey") of its key suppliers. The Survey helps us measure the percentage of our supplier base that may be considered high risk. For more detailed information about the results of the survey, see the Modern Slavery Statement (<https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf>).

DXC have screening questions for suppliers and have incorporated specific questions on modern slavery and human trafficking into our initial screening survey for suppliers. The account team/business end user team routinely assess performance of our key suppliers and evaluate compliance with our Responsible Supply Chain Principles.

We have divided suppliers into three categories based on a risk profile, the use of subcontractors and the size they constitute for DXC have been leading the categorization. The third category consists of smaller suppliers that would not be proportionate to include in the overall assessment.

DXC will not currently conduct investigations regarding the suppliers' suppliers.

5. RISK ASSESSMENT

5.1 Internal Assessment

As referred to in section 4.3, DXC has several comprehensive routines that apply globally to the company. DXC has reviewed and strengthened its efforts to safeguard human rights and decent working conditions. The procedures and routines apply to the Norwegian unit.

Following the review, DXC considers it highly unlikely that there is any risk in its own operations that could lead to negative impact or harm, or contribute to negative influence or harm, in areas that the Transparency Act is intended to protect. We believe DXC's Code and policies, in conjunction with the principles, will raise awareness of decent working conditions and encourage greater reporting and cooperation.

DXC will work preventively throughout the year to keep updated on the requirements set out in the Act. DXC will also increasingly require suppliers and customers to work on prevention in the same way.

5.2 Supplier assessment

The information we have obtained indicates a low risk of breaches of the regulations on decent working conditions among DXC's suppliers. DXC suppliers of all sizes agree with our views on human rights abuses and decent working conditions. They are taking concrete steps and establishing processes to combat possible problems. The suppliers have responded that they comply with the central regulations that apply in this area. Furthermore, the suppliers give the impression that they have good routines that they comply with in practice. The suppliers to the Norwegian legal entity are diverse and include mostly Norwegian/European suppliers and suppliers from the DXC group.

The general risk of violations of fundamental human rights also appears to be low. DXC will pay particular attention to suppliers that have subcontractors in countries with a higher risk of violations of decent working conditions and/or fundamental human rights. Beyond asking questions about suppliers' follow-up of their subcontractors, DXC will not yet conduct further investigations of its suppliers.

5.3 Inquiries and compliance with these

Since June 2023, DXC has received only one inquiry about the law, which was duly responded. No further follow-up of questions or other inquiries has therefore been carried out. DXC has routines for following up inquiries, and these will be answered shortly (within three weeks).

6. CONCLUSION

At present, the company has not uncovered actual negative consequences or a significant risk of negative consequences through the risk assessments that have been carried out, both internally and in our supply chain.

Based on the information the Company has reviewed so far, the Company has assessed the risk of violations of basic human rights and decent working conditions in its own operations, and with business partners and suppliers, as low. The company has therefore found no need to implement mitigation measures at this time.

The company will continue the ongoing work of mapping its own operations and suppliers. DXC is of the opinion that the work to comply with the requirements of the Transparency Act helps to raise awareness within the business. We will become more aware of our choice of suppliers, and we will be able to help our suppliers become more aware in their choice of subcontractors.

On 26 June 2024, based on the information that emerges from the report and other underlying documentation, the Board believes that DXC meets the requirements set out in the Transparency Act.

Oslo, 26 June 2024

The board of DXC Technology Norge AS



Signature:

Chairman

Robbert Wentink



Signature:

Board member

Espen Olsen

Per Andor Holmquist
Per Andor Holmquist (Jun 28, 2024 15:05 GMT+2)

Signature:

Board member

Per Andor Holmquist