FY26 Norway Transparency Act Annual Report: 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 report covers the fiscal year ending on 31 March 2026, referred to in DXC as financial year 2026 (FY26).

DXC is part of the DXC group. DXC Technology Norge AS's sole shareholder is DXC Technology Danmark A/S.

2. Presentation of the Company

DXC Technology Norge AS ("DXC") is a leading enterprise technology and innovation partner delivering software, services, and solutions to global enterprises and public sector organizations, helping them harness AI to drive outcomes at a time of exponential change. With deep expertise in Managed Infrastructure Services, Application Modernization, and Industry-Specific Software Solutions, DXC modernizes, secures, and operates some of the world's most complex technology estates.

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.

DXC serves approximately 50 clients across Norway. As of 31 March 2026, DXC had 131 employees, all employed on permanent contracts, and seven external consultants on long-term assignments.

As of the date of approval of this report, the Board of Directors of DXC Technology Norge AS consists of:

(a) Manuel Maria Correia, chairman

(b) Espen Olsen, board member, managing director

(c) Felora Zohali, board member

(d) Veronica Bauge Downing, board member

(e) Per Andor Holmquist, employee elected board member

(f) Oddny Hønsi Ringheim, employee elected board member

(g) Einar Gruben, deputy board member

(h) Bjarte Hodnekvam, employee elected deputy board member

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.

Section 5 of the Act requires in-scope enterprises to publish an annual statement setting out:

(a) A general description of the enterprise's structure, area of operations, guidelines, and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.

(b) Information regarding actual adverse impacts and significant risks of adverse impacts identified through due diligence.

(c) Information regarding measures implemented or planned to cease actual adverse impacts or mitigate significant risks, and the results or expected results of those measures.

DXC falls within the scope of the Act. As the Act is a Norwegian legal requirement, the Norwegian legal entity must have its own process and publish its own report based on the risk assessment for its supply chain.

DXC Technology Norge AS carries out its due diligence obligations under the Act through a combination of locally anchored oversight and globally developed policies, tools, and processes. Responsibility for compliance with the Act, including preparation of risk assessments and responding to information requests under Section 6, is undertaken both locally and globally in coordination with DXC's global third-party risk management function.

Norwegian suppliers designated as having risks of human rights or modern slavery concerns are subject to continuous monitoring through DXC's AI-enabled risk monitoring platform, which screens for indicators of modern slavery and adverse working conditions across geographic and industry risk factors. The processes and their application to the Norwegian entity's operations and supply chain are discussed below.

4. The Company's Work With the Act

4.1 Responsibilities

As a United Nations Global Compact signatory, DXC supports the Ten Principles of the UN Global Compact, including supporting and respecting internationally proclaimed human rights and ensuring DXC is not complicit in human rights abuses.

At the global level, DXC Technology Company's board of directors holds overall oversight responsibility for the management of the Company, including risks related to adverse impacts on human rights and decent working conditions. DXC's chief ethics and compliance officer (CECO), reporting to the executive vice president and general counsel with indirect oversight from the Audit Committee, also serves as DXC's designated global human rights officer.

At the local level, the Managing Director of DXC Technology Norge AS holds overall responsibility for compliance with the Transparency Act and reports to the Chair of the Board. The Managing Director is responsible for ensuring that due diligence, annual reporting and information-request processes are maintained.

DXC's due diligence process is structured in alignment with the OECD Guidelines for Multinational Enterprises, following a six-step approach: (1) embedding responsible business conduct into corporate policies; (2) identifying and assessing actual and potential adverse impacts; (3) implementing measures to cease, prevent, or mitigate adverse impacts; (4) tracking the implementation and results of those measures; (5) communicating with affected stakeholders; and (6) providing for remediation where required. Due diligence is carried out regularly and proportionately to the size, nature, and context of the Company's operations

4.2 Requests for Information

Information about the Transparency Act has been posted on the Company's website, including general information on compliance and a dedicated email address for inquiries. In accordance with Section 6 of the Act, any person has the right to request information from DXC regarding how the Company addresses actual and potential adverse impacts. DXC is required to respond within three weeks, or within two months where the volume or type of information makes a three-week response unreasonably burdensome.

If questions or other information indicate that action is needed, the Board will take the necessary measures.

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 the following policies and procedures covering the areas the Act is intended to protect:

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

All documents listed above are published on DXC.com, apply to the entire DXC group. The Code of Conduct is also published in Norwegian. Detailed descriptions of each statement are set out in the subsections below.

4.3.1 Modern Slavery Statement

The FY26 Modern Slavery Statement reflects DXC's efforts to be a principled and responsible corporation. The statement is designed to be responsive to the Canadian Fighting Against Forced Labour and Child Labour in Supply Chain Act, the U.K. Modern Slavery Act, the Australian Modern Slavery Act, the German Act on Corporate Due Diligence in Supply Chains, the Californian Transparency in Supply Chains Act, and the Norwegian Transparency Act. It details actions taken in the fiscal year ending 31 March 2026. The latest statement was approved by DXC's Board of Directors on May 1, 2026.

4.3.2 Human Rights Statement

The DXC Human Rights Statement was developed in accordance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the UN Universal Declaration of Human Rights. The latest statement was approved on March 25, 2026, by DXC's Chief People Officer, Jennifer Ragone, and DXC's Human Rights Officer and Chief Ethics and Compliance Officer, Feras Sadik.

Our human rights principles include:

- Fair employment practices: DXC acts with integrity, is committed to fair employment practices, and abides by employment laws in the markets in which we operate.
- Child labor: DXC prohibits the use of child labor, in accordance with ILO Convention 138, throughout our global operations and supply chain.
- Forced labor: DXC rejects the use of forced labor in all its forms, including prison or debt bondage labor, trafficking, and the lodging of deposits or identity papers by employers or outside recruiters. We do not accept unreasonable restrictions on workers' freedom of movement in any DXC facility.
- Health and safety: We are committed to providing a safe, healthy work environment free from violence, harassment, intimidation, and other unsafe or disruptive conditions. We use an ISO 45001 certified system to detect threats to health and safety.
- Non-discrimination: We promote an inclusive work environment that provides employees with fair treatment, opportunities for career development, and protection of human rights.
- Freedom of association: DXC upholds the freedom of association and the effective recognition of the right to collective bargaining.
- Compensation: DXC's wages paid for a standard work week must meet at least legal minimum standards. Deductions from wages as a disciplinary measure are not permitted.

4.3.3 Responsible Supply Chain Principles

The DXC Responsible Supply Chain Principles form part of our framework of standards for conducting business. They are organized into six main categories: Human Rights, Labor, Ethics and Compliance, Environment, Inclusivity, and Corporate and Management Systems. New and existing suppliers must accept these Principles when entering into a new agreement. We require suppliers to sign the Principles and cascade them, or like requirements, to their own suppliers.

4.3.4 Code of Conduct

DXC's Code of Conduct applies to all employees, directors, officers, executives, subsidiaries, affiliates, business partners, suppliers, agents, and other representatives. The Code is available in 27 languages, including Norwegian. All managers and employees can seek assistance from "DXC Integrity" through the SpeakUp Line to report or obtain guidance on ethical issues.

DXC requires all employees and contractors to complete mandatory Code of Conduct training annually. The training covers human rights, anti-harassment, proper workplace behavior, anti-corruption, managing conflicts of interest, information security, and environmental sustainability. New hires are assigned the training within 4 days of onboarding and must complete it within 30 days. In FY26, DXC achieved a 100% completion rate for annual Code of Conduct training. Violations may result in disciplinary action, up to and including termination.

4.4 Mapping

4.4.1 Internal Compliance

DXC has mapped its own operations by reviewing agreements, routines, policies, and systems, including employment contracts, ethical guidelines, and timesheets for working hours. Investigations have been carried out to verify that these are practiced and followed.

In FY26, DXC Technology Company undertook an internal audit focused on identifying potential indicators of modern slavery among its workforce. The audit, conducted in February 2026, identified no concerns. DXC's broader human rights and working-conditions compliance is monitored through additional mechanisms, including locally compliant employment agreements, mandatory Code of Conduct training covering anti-harassment, non-discrimination, and fair workplace practices, and ongoing HR oversight of wages, working hours, and health and safety. 100% of DXC Technology Norge AS employees are on permanent contracts.

4.4.2 Supplier Compliance

DXC conducts annual modern slavery due diligence on its higher-risk suppliers. We continuously monitor ongoing human rights risks using an AI-enabled risk monitoring platform. The suppliers actively monitored include DXC's largest suppliers (top 75% by spend) and suppliers operating in geographies or industries at high risk for modern slavery.

In FY26, 183 suppliers were identified for continuous modern slavery monitoring. The AI-enabled platform has not identified direct or indirect supply chain concerns for these higher-risk suppliers. 77% of our higher-risk suppliers by spend have published Modern Slavery Statements describing their prevention efforts.

As an improvement from last year, DXC introduced modern slavery pre-screening on potential new suppliers falling into at-risk areas. Suppliers are contractually required to comply with the Responsible Supply Chain Principles, including upholding human rights and preventing modern slavery. DXC also considers how its own procurement practices may affect suppliers' ability to uphold human rights standards. The Company's procurement processes are designed to provide reasonable lead times and commercially fair terms, and DXC engages with suppliers collaboratively to support capacity-building where appropriate, rather than relying solely on contractual compliance requirements.

4.5 Grievance Mechanisms

DXC maintains multiple channels for employees, contractors, suppliers, and third parties to report concerns confidentially (where permitted by local law) and anonymously if chosen:

- Supervisor and management chain
- SpeakUp Line at www.speakupdxc.com
- SpeakUp mailbox at speakup@dxc.com
- Human Resources channels
- DXC Response Operations Center
- DXC Legal

The SpeakUp Line is a comprehensive and confidential reporting tool available to employees, officers, directors, contractors, suppliers, and other third parties. DXC does not tolerate retaliatory actions against anyone who raises a concern or cooperates with an investigation. Retaliation against individuals who report misconduct in good faith or participate in investigations is strictly prohibited and will result in disciplinary action, up to and including termination.

No internal modern slavery or human rights concerns were reported through DXC grievance channels in FY26.

4.6 Stakeholder Engagement

DXC recognizes the importance of meaningful engagement with affected stakeholders and rights-holders. The Company maintains multiple channels through which workers, community members, and other stakeholders can raise concerns, including the SpeakUp Line, which is available to employees, contractors, suppliers, and third parties on DXC.com.

In FY26, no stakeholder concerns related to human rights or decent working conditions were received through these channels. As part of its continuous improvement efforts, DXC is evaluating additional mechanisms to proactively engage with potentially affected stakeholders in higher-risk segments of its supply chain, such as contract laborers in facilities maintenance or electronics manufacturing.

5. Risk Assessment

5.1 Internal Assessment

As described in Section 4.3, DXC maintains comprehensive global policies and procedures that apply to the Norwegian entity. DXC reviews human rights policies, modern slavery prevention practices and decent working conditions annually. Activities undertaken to monitor protection of human rights and prevention of modern slavery are described in Section 4.4.1.

DXC's highly skilled workforce, strong internal controls, and high rate of permanent employment reduce the likelihood of adverse impacts. The Company acknowledges that no monitoring system provides complete assurance and will continue to refine its assessment methods to identify any emerging risks.

5.2 Supplier Assessment

DXC's FY26 supply chain risk assessment identified the following risk areas:

Risk Description	Risk Level	Commentary
Risk of modern slavery in suppliers located in countries at high risk for modern slavery	Low	IT services procured by DXC require highly skilled specialists who are not typically at risk.

Risk of modern slavery in services relying on low skill levels, such as security, catering, and janitorial services	Low	These services are typically provided by facility management partners with modern slavery programs, such as CBRE and Jones Lang LaSalle.
Risk of modern slavery in electronics procurement	Moderate	DXC mitigates this risk by procuring IT equipment from major manufacturers (Dell, IBM, HP Inc., and Lenovo) that participate in the Responsible Business Alliance and maintain published modern slavery programs. In FY26, DXC verified that all primary electronics suppliers had current modern slavery statements and active supply chain audit programs.
Risk of excessive working hours or inadequate wages among subcontracted service workers	Low	DXC's Responsible Supply Chain Principles require compliance with applicable wage and working-hour laws; facility management partners maintain third-party audited labor standards.
Risk of workplace health and safety violations in supplier operations	Low	DXC procures primarily professional IT services; physical operations are limited and managed by partners with ISO 45001 or equivalent certifications.

The overall findings from DXC's FY26 supply chain risk assessment indicate a low risk of adverse impacts on fundamental human rights and decent working conditions among the Company's suppliers. Suppliers to the Norwegian legal entity are diverse and include mostly Norwegian and European suppliers and suppliers from the DXC group. DXC specifically monitors suppliers located in geographies with a higher risk of modern slavery violations.

The Company references the US Trafficking in Persons Report and the US Department of Labor List of Goods Produced by Child Labor or Forced Labor report when evaluating modern slavery risks, applying this methodology consistently across procurement categories.

5.3 Effectiveness Measures and KPIs

DXC monitors the effectiveness of its supply chain management through the following key performance indicators:

- Percentage of high-risk suppliers: Fewer than 3% of DXC's suppliers fall into the risk categories defined in the modern slavery risk assessment.
- Number of suppliers with active modern slavery violations: In FY26, DXC received no reported concerns or evidence of active modern slavery in our supply chain.
- Code of Conduct training completion rate: In FY26, the training completion rate was 100%.
- Number of modern slavery complaints raised through grievance channels: In FY26, no modern slavery concerns were received.

5.4 Investigation, Remediation and Corrective Action

DXC Integrity manages investigations through trained global investigators and a formal issue-management methodology. If indicators of modern slavery were ever identified, DXC would:

(a) Launch an immediate investigation.

(b) Engage the supplier to develop a corrective action plan if a modern slavery occurrence is confirmed.

(c) Monitor implementation of the corrective action plan.

(d) Evaluate remediations for affected families.

(e) Document remediation outcomes.

(f) Consider suspension or termination for non-compliance.

In FY26, DXC did not identify any instances of modern slavery in our own operations or supply chain, so no remediation measures were required.

5.5 Inquiries and Compliance

No inquiries about the Act were received in FY26. DXC has a process in place to respond to inquiries, and will respond within three weeks of receiving the inquiry.

6. Continuous Improvement

As a United Nations Global Compact signatory, DXC continues to strengthen its human rights efforts, learn from the best practices of our partners, governments, and non-governmental organizations, and act as a role model for our suppliers and our communities.

Improvements in FY26:

- Introduced modern slavery pre-screening on potential new suppliers falling into at-risk areas.
- Continued deployment and refinement of the AI-enabled risk monitoring platform for continuous supply chain oversight.
- Updated the DXC Human Rights Statement (approved March 25, 2026), reaffirming key commitments and aligning with current international standards.

Future actions: DXC will continue to strengthen its human rights efforts in line with industry best practices. As opportunities arise, the Company will evaluate the effectiveness of additional prevention actions and respond accordingly.

7. Conclusion

Based on the information the Company has reviewed, 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. Where risks have been identified, the Company has implemented proportionate mitigation measures as described in Section 5.2. No actual adverse impacts on fundamental human rights or decent working conditions were identified during the reporting period.

Based on the information set out in this report and other underlying documentation, the Board of Directors of DXC Technology Norge AS has reviewed and approved this account on 17 September 2026. The Board considers the Company's due diligence practices to be aligned with the requirements of the Transparency Act.

Manuel Maria Correia

Manuel Maria Correia
Chairman
Date: 09/26/2026

Felora Zohali (Sep 25, 2026 10:05:19 GMT+2)

Felora Zohali
Board Member
Date: 09/25/2026

Espen Olsen
Board Member, Managing Director
Date: 09/24/2026

Veronica Bauge Downing
Board Member
Date09/27/2026

Per Andor Holmquist (Sep 24, 2026 13:50:58 GMT+2)

Per Andor Holmquist

Employee Elected Board Member

Date: 09/24/2026

Oddny Hønsi Ringheim

Employee Elected Board Member

Date: 09/24/2026

This report is published on https://dxc.com/about-us/legal-compliance and will be updated annually by 30 June, or earlier in the event of significant changes to the Company's risk assessments.