



# Statement under the Transparency Act for the Jobzone Group

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## Statement under the Transparency Act (cont'd)

### 1. Introduction

In recent years, both in Norway and internationally, there has been increasing attention to corporate social responsibility and respect for human rights. As part of this development, the Norwegian Parliament adopted a law on June 18, 2021, to address these concerns:

*""Act on Transparency and Work with Fundamental Human Rights and Decent Working Conditions (Transparency Act)""*

The Transparency Act came into force on July 1, 2022, and is a regulation of international guidelines on corporate responsibility for human rights. The purpose of the Act 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 also aims to ensure public access to information on how companies handle negative impacts on fundamental human rights and decent working conditions.

The Transparency Act applies to larger companies domiciled in Norway that offer goods and services in or outside Norway. The Act also covers larger foreign companies that offer goods and services in Norway when they are taxable to Norway under Norwegian domestic law. "Larger companies" are defined as companies of public interest under the Accounting Act § 1-6, or that exceed at least two of the following three thresholds on the balance sheet date:

- |  |                            |
|--|----------------------------|
| <input type="checkbox"/> Sales / Revenue                                   | > NOK 70 million           |
| <input type="checkbox"/> Balance sheet total                               | > NOK 35 million           |
| <input type="checkbox"/> Average number of employees in the financial year | > 50 full-time equivalents |

### 2. Reporting Obligation

Jobzone Group, headquartered in Oslo and domiciled in Norway, consists of the parent company Jobzone AS and 13 subsidiaries (see organizational chart in section 5 below). Some of these subsidiaries meet the thresholds in section 2 above, which means that the parent company Jobzone AS is also considered a larger company under the Transparency Act – even though the company itself does not meet the above criteria.

This means that Jobzone AS is obliged to report on due diligence assessments under the Transparency Act and make the report available to the public. These due diligence assessments must be carried out regularly and be proportionate to the size and nature of the business(es), the context in which the business(es) operate, and the severity and likelihood of any negative impacts on fundamental human rights and decent working conditions. Jobzone AS must also regularly, or in the event of significant changes, assess the group's suppliers against violations of fundamental human rights and decent working conditions.

Jobzone AS mainly administers the supply chain on behalf of the group and ensures that the subsidiaries comply with the Transparency Act. This report therefore includes the due diligence assessments carried out by the group and describes the measures that have been considered and implemented throughout the group's supply chain to reduce the risk of violations of fundamental human rights and decent working conditions. A new due diligence investigation will be conducted in the fall of 2025 for all new suppliers, applying the same criteria as described under section 6.

Jobzone AS has prepared this report as a joint report for the entire Jobzone Group.

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### 3. Responsibility

This report on due diligence assessments under the Transparency Act must be signed in accordance with the Accounting Act § 3-5, which means that all board members must sign. The responsibility for fulfilling the obligations under the Transparency Act lies with the boards of the companies covered by the Act, but the overall responsibility for the Jobzone Group's report lies with the board of Jobzone AS.

The CEO of Jobzone has the administrative responsibility to ensure the report is carried out according to the provisions of the Act and has delegated authority to the finance and HR departments, ensuring the practical implementation and coordination of the work. This includes identifying risks and deviations as well as possible measures – and effect of follow-up. Where deemed appropriate, these tasks are delegated to the nearest subject and/or supplier responsible. However, the HR department is responsible for ensuring that updated reports are received, archived, and followed up. This division of labour with associated mandates and guidelines is anchored with the board of Jobzone AS.

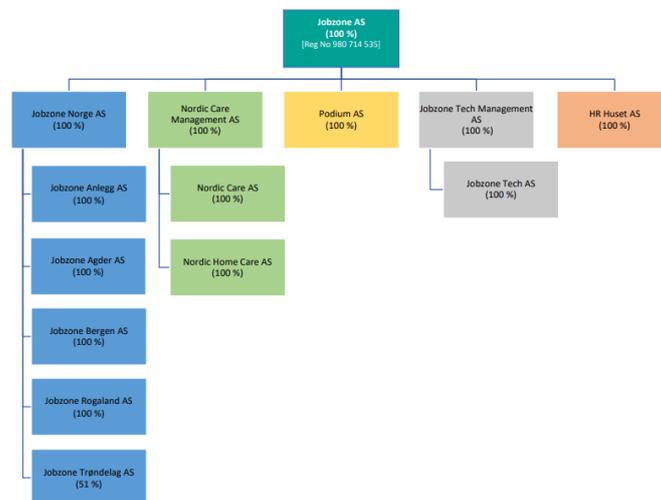
### 4. Risk Acceptance and Ambition Level

Jobzone Group has zero tolerance for violations of fundamental human rights, both internally in the organization and externally in the supply chain and with partners. It is expected that all suppliers and partners, as a minimum, respect fundamental human rights and offer decent working conditions in accordance with national laws and international conventions.

In cases where deviations are discovered, the Jobzone Group will actively work for a quick remedy. Any measures must be implemented and then followed up through dialogue with the group's suppliers and partners. Termination of agreements should only occur in situations where measures do not have sufficient effect. Serious deviations must be reported to the Consumer Authority.

### 5. Company Organization and Operating Area

Jobzone Group is part of the Job&Talent Group, which is headquartered in Madrid and operates in a total of 10 countries in Europe, the USA, and South America. Job&Talent is represented in Norway by the Jobzone Group, which consists of the parent company Jobzone AS and the subsidiaries Jobzone Norge AS, Jobzone Tech AS, HR Huset AS, Podium AS, and Nordic Care AS. The individual subsidiaries are specialized in their respective fields, which means that the group has broad expertise in all aspects of personnel, recruitment, and restructuring.



## Statement under the Transparency Act (cont'd)

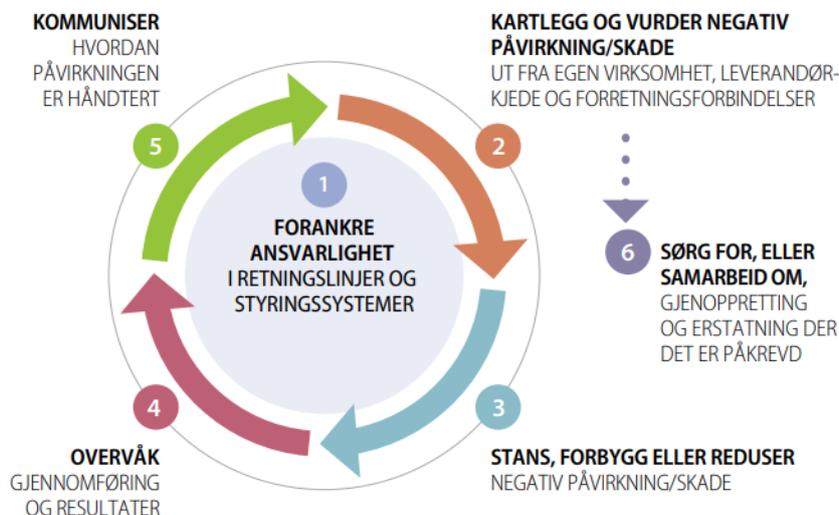
The companies in the Jobzone Group use several of the same suppliers, and all subsidiaries purchase services from Jobzone AS. This means that there are small differences in which goods and services are purchased and which suppliers are used by the subsidiaries. Most of the suppliers are from Norway, but there are also some from abroad.

### 6. Due Diligence Assessment

The implementation of due diligence assessments must be based on the OECD model for due diligence assessments for responsible business conduct. A basic principle is that it should be adapted to the company's context and risk. In the following part of the report, the various steps in the due diligence assessment process will be reviewed:

- Steg 1:** Anchor responsibility in guidelines and management systems
- Steg 2:** Map and assess negative impact/damage from own business, supply chain, and business relationships
- Steg 3:** Stop, prevent, or reduce negative impact/damage
- Steg 4:** Monitor implementation and results
- Steg 5:** Communicate how the impact is handled
- Steg 6:** Ensure or cooperate on remediation and compensation where required

These measures do not represent an exhaustive list of the due diligence assessments carried out. However, not all measures will be appropriate in every context, and in some cases, it may also be more appropriate – and correct – to implement measures not described above.



Jobzone Group must ensure that the companies have an overview of and assess the risk of violations of fundamental human rights and decent working conditions related to the companies' activities and business relationships. To meet the requirements of the Transparency Act, a project group consisting of representatives from the finance and HR departments has been established. The project group has held internal meetings in 2025. As tools in risk mapping and administration work, the program "Complete Control" (by House of Control) has been used.

**Scope:** The Jobzone Group practices a risk-based approach in accordance with the proportionality principle in the Transparency Act. The processes and routines in the work are further linked to the companies' business activities, supply chains, and business partners.

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**Limitation:** The Jobzone Group has made a limitation of the scope in the risk and due diligence assessments carried out. This is mainly done for practical and economic reasons, but also due to a lack of available resources (personnel). Considering this, the assessments have therefore not been carried out in relation to suppliers who, in the last 12 months;

- have represented purchases over NOK 25,000, and/or
- have represented less than 5 individual purchases.

The group has worked based on the six steps in the due diligence assessment described above (ref figure), and the following describes relevant activities and findings for each step in the assessment:

### Steg 1 – Anchor Responsibility

- A description has been made of the positions and role functions responsible for the work.
- A review has been carried out of the instructions and guidelines the group – and Job&Talent – has in relation to topics such as human rights, environmental protection, anti-corruption, ethical rules, etc.
- The relevant routines (supplier declarations, ethical guidelines, anti-corruption programs, whistleblowing routines, etc.) have been compared with applicable framework conditions and relevant changes in these, to ensure compliance between the internal and external management documents of importance.
- Existing routines and guidelines have been updated and made available to the organization.

### Steg 2 – Map and Assess Negative Impact/Damage

- In 2024, 273 new suppliers were added to the group companies – compared to 115 new suppliers in 2023. Most of the suppliers are small businesses with few or individual deliveries.
- The Directorate for Financial Management (DFØ) has prepared a high-risk product list recommended as part of the risk assessment. The list includes product categories with a high risk of violations of fundamental human rights, but the risk level in the entire supply chain must also be considered.

The products are listed as high-risk products because there is extensive documentation showing that these categories systematically violate the UN Universal Declaration of Human Rights, ILO core conventions (prohibition of child labour, forced labour, discrimination, right to organize and collective bargaining), and national labour law and HSE legislation in the products' supply chains. Violations can occur during raw material extraction, component manufacturing, and final product assembly.

- Jobzone Group has followed the recommendation from DFØ and uses the high-risk product list as part of the risk assessment and has used the following principles to map and assess a representative sample of suppliers with so-called "high risk":
  - Product: Whether the relevant supplier products are listed in the "high-risk product list"
  - Geography: Norwegian suppliers according to the criteria as well as all foreign suppliers
  - Consumption: The size of the invoiced purchase values

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- ❑ Based on the above criteria, a custom supplier declaration has been sent to obtain information from suppliers. The declaration was sent to 82 suppliers – compared to 21 suppliers in 2023. These will be continuously followed up, and systematic work will be done to collect responses. As mentioned in section 2, work will continue with the suppliers throughout the autumn

### Step 3 – Stop, Prevent, or Reduce Negative Impact/Damage

- ❑ The project group has so far (as of May 2025) not uncovered any circumstances that provide grounds to determine that there are – or exist suspicions of – any violations of human rights or decent working conditions, either in the group generally or in the individual group companies.
- ❑ Otherwise, reference is made to section 8 below regarding relevant measures that are and/or will be initiated.

### Step 4 – Monitor Implementation of Results

Jobzone Group has established the following plan:

- ❑ Further develop the group's purchasing system in relation to the categorization of suppliers to make it even easier to identify suppliers and map risks.
- ❑ Follow up with suppliers and work to get more suppliers to sign the supplier declaration.
- ❑ Search the suppliers' websites to collect information directly from their own published reports on the Transparency Act.

### Step 5 – Communicate How the Impact is Handled

Jobzone Group uses the mapping to comply with and strengthen the work related to the Transparency Act. The report is easily accessible on the group's websites, and reference is made to the assessments related to the Transparency Act in the board's annual report for the relevant group companies covered by the Act.

### Step 6 – Ensure or Cooperate on Remediation and Compensation Where Required

The sixth and final step in the due diligence assessment is not relevant in this year's report as no significant findings requiring further action have been uncovered.

Jobzone Group otherwise does not carry out such due diligence assessments for (any) partially owned companies that are not part of the group according to the legal definition in the Companies Act § 1-3.

## 7. Findings and Results

Jobzone Group has not uncovered violations of human rights or decent working conditions in the reporting year. No significant risk of breach or negative consequences has been identified. The group finds that dialogue with suppliers is important, and that they mainly follow laws and regulations – despite some having somewhat inadequate guidelines for collecting documentation. It is therefore considered vital that this is noted – and requested, so that the associated routines can be improved.

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Based on missing declarations from 57 suppliers (compared to 71 suppliers in 2023), a manual review of these suppliers' websites was carried out. It turned out that 29 (compared to 54 in 2023) had reported their respective due diligence assessments in accordance with the Transparency Act's rules.

At the same time, it was uncovered that the remaining 28 (compared to 17 in 2023) of the suppliers not having reports on their websites also did not meet the criteria in the Transparency Act related to sales revenue, balance sheet total, and number of employees, ref section 1 above, and thus are not covered by the provisions of the Act. The assessment is nevertheless that these 28 suppliers provide services and products that are not associated with high risk according to DFØ's high-risk product list.

### 8. Measures

Jobzone Group continuously works on risk assessment of the companies' activities and use of suppliers. In this regard, several concrete measures have been identified for the group's further work:

- Jobzone will further develop the due diligence assessments based on the experiences gained.
- Jobzone will maintain and develop internal competence on responsible purchasing practices.
- Jobzone will continuously maintain and update the group's routines and management documents.
- Jobzone will, based on step 2 of the due diligence assessment, audit the group's suppliers by completing/signing a questionnaire that includes the provisions of the Transparency Act.
- Jobzone will conduct a review of the suppliers' websites to collect concrete information directly from the suppliers' own published reports under the Transparency Act.
- Jobzone will contact suppliers in cases where the group itself discovers deviations or receives observations or reports of deviations or violations, so that closer inspection can be carried out.

### 9. Contact Information

For further information, see [[www.jobzone.no](http://www.jobzone.no)](http://www.jobzone.no) or contact by sending an inquiry to [post@jobzone.no](mailto:post@jobzone.no).

This report under the Transparency Act must always be available on the Jobzone Group's websites, and links to this will also be included from the individual group companies' websites.

The content of this report has been reviewed and approved by the board of Jobzone AS at its meeting on June 25, 2025

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## Statement under the Transparency Act (cont'd)

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### For the board of Jobzone AS

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