



# ESG REPORT

— — — 2021

data  respons



# MESSAGE FROM CEO



*Especially in Germany, Data Respons grew more in 2021 within the renewable energy industry than any other industry we are working with across the group. In the last two years our teams have worked on an online energy trading platform where anyone can sell their own renewable energy like solar, wind, water, or biogas.*

*CEO, Kenneth Ragnvaldsen*

# ESG

## AS A COMPETITIVE ADVANTAGE

Data Respons grew more in 2021 within the renewable energy industry than any other industry we are working with across the group. In the last two years our teams have worked on an online energy trading platform where anyone can sell their own renewable energy like solar, wind, water, or biogas.

Our expert teams have also designed and developed another online platform where solar energy and energy storage providers can contact landowners and propose their individual offers. Thus, making it easier to scale up the needed solar energy development.

The German government have also set a target for 15 million EV's on German roads by 2030. A target we are contributing to enabling through a platform that gathers several car charging providers on the same digital platform, thus making it easier to have an electric car and use it across charging providers.

Since 2019 Data Respons has reduced its

emissions by 50%, from around 9000 tons to 4500 tons Co2. Those emissions even include the indirect Scope 3 emissions our suppliers emit on our behalf. Cutting our emissions in half while simultaneously growing the business and our geographical footprint is a big win. We also sent every supplier a letter asking them to join us in becoming carbon neutral and stating that we will add ESG parameters to our supplier requirements.

We continue to work towards having more diversity among our leaders, and last year we achieved 31% women in management positions. We have also established new partnerships when it comes to attracting more women to the business through contributing to events where girls are allowed to engage with technology and female engineers and software developers. The end goal is to inspire more women and girls to shape the future by pursuing education and profession in technology.

*All the best,*



Kenneth Ragnvaldsen,  
CEO Data Respons

```
modifier_ob.modifier_ob = modifier_ob.modifier_ob.new("...")
object to mirror_ob
mirror_ob.mirror_object = mirror_ob
version == "MIRROR_X":
    mod.use_x = True
    mod.use_y = False
    mod.use_z = False
version == "MIRROR_Y":
    mod.use_x = False
    mod.use_y = True
    mod.use_z = False
version == "MIRROR_Z":
    mod.use_x = False
    mod.use_y = False
    mod.use_z = True
```

```
at the end -add back the deselected
select=1
scene.objects.active = modifier_ob
led" + str(modifier_ob) # modifier
context.selected_objects[0]
objects[one.name].select = 1
```

```
"please select exactly two objects,
OPERATOR CLASSES
(operator):
    context.mirror_mirror_x"
    "X"
```

```
context):
    context.active_object is not None
```

# ABOUT THIS REPORT

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This report focuses on Group wide ESG performance and the management approach to Data Respons' material ESG issues. Qualitative and quantitative data in the report predominantly comes from Data Respons' business segments - R&D Services and Solutions - which constitute all the software and hardware development in the company.

**The report has been approved by Data Respons' Board of Directors.**

**Data Respons' carbon mapping has been externally assured by Endrava.**

**The ESG report has not been reviewed by a third party.**

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**This is Data Respons third comprehensive ESG-report, covering the fiscal year 2021. The report has been prepared in line with EU directives on mandatory annual disclosures of non-financial information and is inspired by the GRI framework for sustainability reporting.**

**Our ambition is to improve our ESG reporting from year to year, and to report in accordance with the GRI Standards by 2023. The next report will be published In May 2023.**

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# **Data Respons' approach to sustainability: THROUGH TECHNOLOGY**

**ESG is important to us for several reasons: We believe in our ability to impact sustainability through technology. We have unique possibilities to support and enable solutions and services that saves resources, reduces emissions and create better quality of life.**

**We also increasingly experience that having a sustainable business that's serious in all the ESG dimensions is a both an expectation and a competitive advantage.**

## **Why it matters to us**

Climate change is accelerating, becoming more intense and some of the trends are now irreversible according to the latest report from the UN Climate Panel (IPCC). Data Respons as an international organization takes this seriously and has therefore communicated that by **2025** we will be net-zero.

Despite the obvious need to support the Science based targets, our engagement for ESG matters also supports our value: being generous and taking responsibility.

Also, through being a leading company on ESG we get increased competitiveness, as well as we meet customer demands and employee demands.

- Furthermore, we have contacted most of our suppliers and asked them to join us on our journey to zero emissions until 2025.
- At several of our locations, we have already switched to guaranteed renewable electricity. As a result, some of our companies are about to become net-zero.
- We continue to promote our code of conduct, which forms the foundation of our actions and decisions.
- To understand more about what drives our stakeholders, we executed this year for the first time a stakeholder dialogue. The learnings from this assessment form the basis for our materiality matrix and define the leading topics of this report.

## **Sustainability achievements in 2021**

In 2021, we have already been able to achieve some small successes in the field of sustainability.

- We have established our own group of ambassadors, with which all subsidiaries are represented by one (or more) sustainability representatives.
- Inspired by GRI standards, we have published a comprehensive ESG report.
- In addition, we have continued our **UN Global Compact** engagement and become a part of UN's **Carbon Neutral Now** initiative.

## **Lessons learned. Sharing is caring**

Emissions reporting is not an easy fix. Especially when the ambition is to map all direct and indirect emissions. However, it the only way to fully understand your carbon footprint. Every year we are improving the methods and processes to collect data. And every year we become a bit better at filling in the blanks.

We think this learning curve does not only apply to us. But we do think that many companies are learning too much on their own, which is a suboptimal process. That's why we want to work with our partners to establish an ESG learning arena, to achieve collective improvements.

# GOALS & AMBITIONS 2021

## Topics in this chapter:

- Goals and ambitions within ESG
- Key ESG highlights 2021

# GOALS & AMBITIONS WITHIN ESG

2025

Reach CO2-  
neutrality

40%

Women in the  
management  
by 2025  
(long term goal is 50%)

2021

Sustainability  
conduct audits at  
largest suppliers  
in Taiwan

25%

Women in the  
total workforce  
by 2021  
(long term goal is 50%)

## Environmental

- 100 sustainable projects
- Improve mapping of materials to include all used materials
- Change energy supplier to renewable sources
- Continue implementing our sustainability strategy across the group
- Set up concrete actions plans for every daughter company on how to become CO2 neutral by 2025

## Social

- Increase the gender balance up to 25% women
- Maintaining diversity or increase the mix of nationalities
- Continue to strengthen a culture that creates an international and attractive work environment and our recruiting efforts in 2021
- Use our sponsorships under the concept of Enabling the Young, to actively promote the next generation, and especially encourage and help girls into the tech industry

## Governance

- Revise the company Code of Conduct
- Using our purchasing powers to draw our suppliers in the right dimension and promote ESG in value chain
- Conduct sustainability audits at largest suppliers in Taiwan during 2021

# KEY ACTION POINTS AT DATA RESPONDS



Connecting with the right partners



Mapping emissions



Using our purchasing power



Joint offsetting platform



Carbon budgets



Ramping up internal communication



Prioritising communicating green projects



Reduced air travel

These are key actions identified to be able to deliver on our long-term ambitions.

## Key ESG Highlights 2021

### Environmental:

- Sent a letter to all suppliers asking them to join us in becoming carbon neutral and confirming that ESG parameters will now also affect the decision on which suppliers to work with
- Encouraged a switch to guaranteed renewable energy in all offices in Europe
- Established local action plans for lowering carbon footprint.
- Introduces a online platform to assess and rank suppliers on ESG topics
- Reduced travel
- Worked to enable local sustainability ambassadors at every operation and location

### Social:

- Joined two different network events to promote diversity and female participation in our industry
- Various social activities to promote and protect our corporate culture during the pandemic

### Governance:

- Updated our Data Privacy Policy
- Continued to onboard people in our Code of Conduct

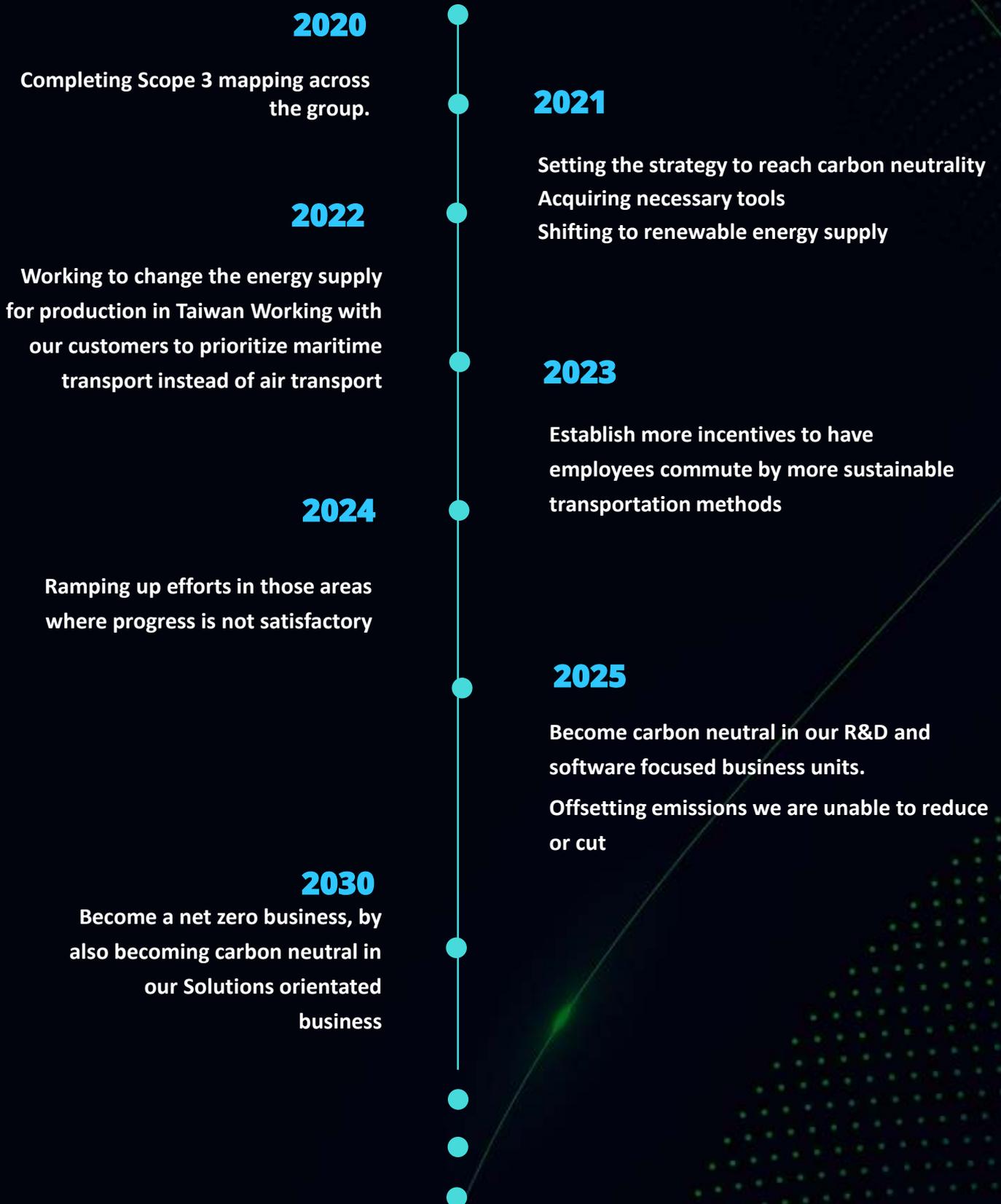
# ESG OUTLOOK

## 2025 TARGETS

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- CARBON NEUTRAL
- BIG GREEN BUSINESS
- SUPER ATTRACTIVE BRAND
- A PUBLIC PLAYER
- ABOVE STANDARD
- A NET POSITIVE CONTRIBUTOR

# Reshaping our business Roadmap to 2025 & 2030



# TECHNOLOGY THAT MAKES A DIFFERENCE

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- Un Global Compact membership
- UN SDG's & Data Respons deliverables

# THE UN GLOBAL COMPACT

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We support the UN Global Compact and conduct our business in line with the ten principles related to human rights, labour standards, environment and anti-corruption.

We also align our efforts with the UN Sustainable Development Goals and our company values; taking responsibility, to perform, to be generous and having fun. We will continue to conduct our business in line with the ten principles related to human rights, labour standards, environment and anti-corruption.



**United Nations**  
Global Compact

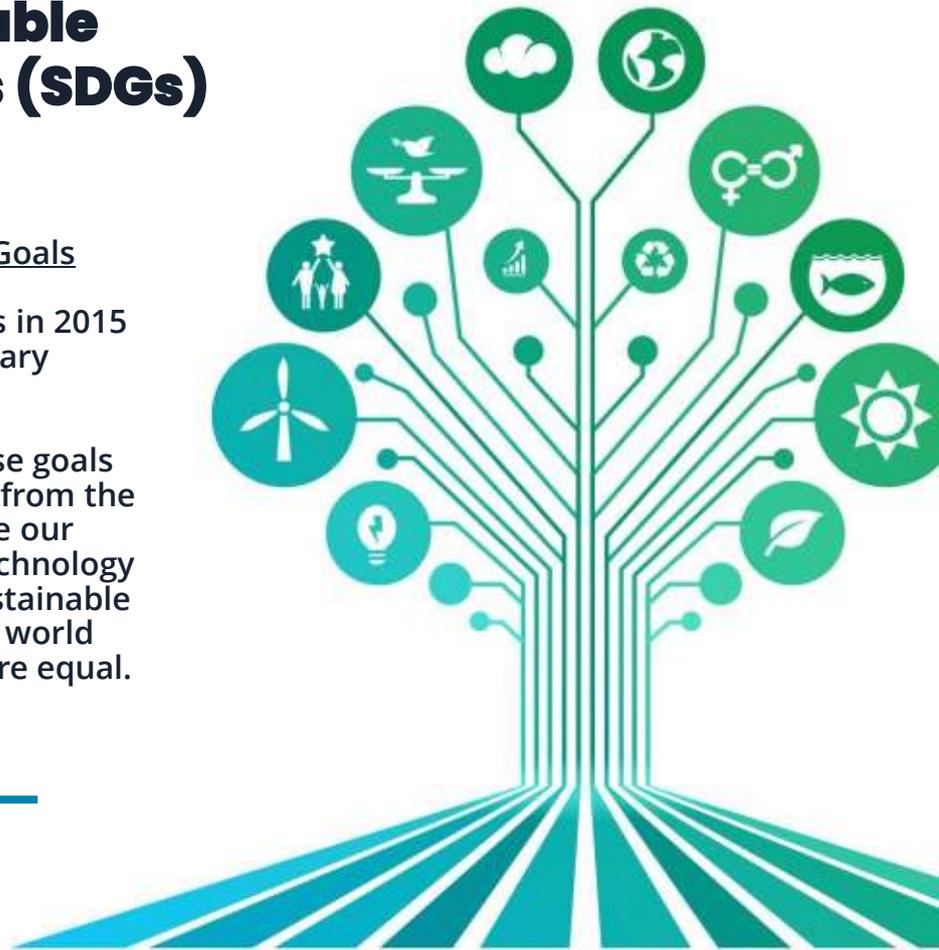
**Data Respons' Communication on Progress  
2021 is available on  
UN Global Compact website:**

<https://www.unglobalcompact.org/what-is-gc/participants/134406#cop>

# The Global Sustainable Development Goals (SDGs)

The UN Sustainable Development Goals were adopted by all the world's governments at the United Nations in 2015 and provide a common and necessary roadmap.

At Data Respons, we celebrate these goals and believe in making a difference from the inside; inside technology and inside our companies. We strive to explore technology projects contributing to a more sustainable world, especially those making the world greener, stronger, smarter and more equal.



## SUSTAINABLE DEVELOPMENT GOALS





## **INCREASING NUMBER OF SUSTAINABLE TECHNOLOGY PROJECTS**

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We believe technology development is vital to enable a sustainable future! Data Respons has set goals to aim for more than 50 technology projects yearly that contribute to a more sustainable world, especially those making the world greener, resilient, smarter and more equal.

### **Ambitions**

As we increasingly work on projects with a sustainability edge to them and as our company grows in size, it's natural that we increase our ambitions. We aim to deliver a minimum of 100 projects that have valuable effects on the SDGs by 2022.

### **Execution**

Sustainability has been an integrated part of our strategy for years. However, we have not managed to integrate sustainability in our day-to-day business to a satisfactory level. We are now working to visualize carbon cost in our customer contracts and employ eco design as a natural step in the product cycle.

## Full harness support for electric hydrofoiling boat

inContext supported with development of prototypes, and sourcing of cable harness for the model C8 electric boat. Our electrical experts went through the electrical schematics with cable harness to change and add all detailed data that is needed to be able to produce a full cable harness to the boat. inContext is mainly focusing on design and prototypes of the model.



## Improving the capabilities of hybrid trucks

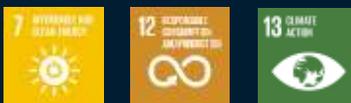
inContext assisted a large Nordic truck manufacturer in upgrading its hybrid truck. The upgrades includes integrating new charging capabilities and increasing the truck's range when running on batteries



## Online energy trading platform

This project is about an energy trading platform for the German market and is now expanding the concept to the whole of Europe. On this platform anyone can sell their own renewable energy from a min. size of 3000 mWh, like for instance solar, wind, water or biogas.

As an energy supplier you can thus be sure that your offer is taken to market in the best possible way, and that you will get the correct market price, without any delay. This platform also indirectly incentives more people to invest in small scale renewable energy by making it possible and easy to sell their excess energy to the market.



## Online platform for publishing a Solar Power Plant proposal

The owner of any given land area describes the conditions and environment for where solar power panels shall be installed. Solar energy and energy storage providers can then contact the landowners and propose their individual offers.

Another advantage this platform provides is that the platform also functions as a bridge to the open energy market. As a landowner with a solar energy plant on your property you can buy the energy back later at a discount or use it at other places like your vacation home.

Through this online platform an owner of an area that can fit a small solar plant can easily connect with the right companies and become almost self-sufficient with renewable energy. Most importantly the platform lowers the bar for more people to become providers of renewable energy and taking part in the smart energy infrastructure.



## Building temperature display

The company has a large number of production facilities. This application is used to monitor the temperatures in these buildings. This is to ensure that the work safety for employees is maintained, especially during hot periods, and that work is stopped in particularly affected areas in extreme situations.



## E-Trucks

The project mainly focuses on developing trucks which are supplied with power overhead from Pantographs, a key component in the future of road freight.

Cable harness experts from inContext AB are designing the e-trucks' wiring.



## Making wind turbines more effective and intelligent through automation and smarter connectivity

Wind turbines need regular maintenance and cannot run under certain circumstances, like when endangered birds are passing through the area or when the wind reaches too strong levels. IT Sonix developed and implemented a software stack that gathers data on the availability of wind turbines through a given timeframe.

As a consequence, data allows more reliable planning of operational time and predicted downtime. Through better data and operational understanding, it also becomes easier to integrate wind energy into the grid and have clear picture on the potential energy mix at any given time.



## Digital platform of electric car charging providers

If you are one of the pioneers that have purchased an electric car in Germany, you probably have experienced some frustrations in not finding a functioning charger or you got lost in the jungle of varying charging providers.

IT Sonix has developed a platform that gathers several charging providers on the same digital platform making it easier have an electric car and use it across charging providers. The platform is already being rolled out across Germany and next in line is Europe. Adding more existing charging providers and new car chargers.



## Enable electric Carsharing in Berlin

Cars are parked 95% of the time. IT Sonix has also developed a cloud backend and architecture, worked on frontend user experience, and designed mobile apps, that enables pure electric car sharing in Berlin. The mission is to use cars more efficiently, contribute to electrification and avoid unused cars and reduce the number of cars in the cities.

The platform is planned to roll out internationally in 2021. Electric car sharing provides flexible mobility without the costs, commitment, and responsibilities of owning an own car. At the same time, you contribute to a quieter, less polluted and more livable city by only occupying a car when you really need it and by driving purely electric. Ultimately, this solution helps to save money, both for businesses and individuals as both customer types can rent electric cars on-demand and hereby reduce costs.



## Connecting trucks to the cloud

IT Sonix has developed a solution that connects every truck to the cloud, thus enabling connectivity and data gathering on a whole new level. Better data and connectivity enable much efficiency and the possibility to transport more goods with fewer trucks on the road.

The solution has provided the steppingstone for automated and optimized rides. Also making it possible to predict which routes save the most emissions, and to give the driver feedback on how to drive more economically. To mention a few of the features. Allowing a company to track its vehicles in real-time helps to avoid delays, simplifies communication and avoids unnecessary rides. Finally, it increases safety by addressing unsafe driving and helps the driver to optimize the driver experience through an own driver app.





# **STAKEHOLDER ASSESSMENT**

# STAKEHOLDER DIALOGUE

## Data Respons' Stakeholder Dialogue for 2021 and 2020

At Data Respons, we always seek open dialogue and cooperation with all our stakeholders. By knowing what drives our stakeholders, we believe we can make a positive difference and contribute to the achievement of the UN Sustainable Development Goals (SDGs). Data Respons has an ongoing dialogue with various stakeholder groups about topics they are concerned with.

## Development of Data Respons' Stakeholder Dialogue in 2020 and 2021

For last years' report (2020), we conducted the stakeholder dialogue and materiality assessment in a workshop executed by key members of Data Respons' corporate management. Since we aim to evolve towards a GRI-classified report, the missing criteria is to conduct real dialogue with our key stakeholders. To improve this, we had conversations with employees, owners, and clients for this report.

Data Respons' most important stakeholders are employees and future employees, clients, suppliers and our owners (Akkodis). Further, authorities, local communities, organizations, research communities and suppliers. The dialogue is conducted through meetings and other forms of direct communication, customer and employee surveys, participation in networks and industry organizations and work projects.

### Employees and future employees

Data Respons' employees are primary stakeholders that directly affect and are also affected by our policies and activities.

### Investors/Shareholders/ Owners

Data Respons is fully owned by Akkodis. And Akkodis executives fills the seats in the board of directors.

## Clients

Data Respons clients directly affect the company economically, and their expectations contribute to setting our sustainability priorities. We conduct the dialogue to this stakeholder group through an ESG-specified survey sent to one representative of this group. We also send out more generalized customer surveys.

## Governments and civil society

Governments and regulatory authorities affect our operating conditions directly and indirectly. Local communities are indirectly affected by the company's activities in job creation, tax payment, and environmental impact. We follow regulations from the government, like the EU taxonomy and Data protection laws that impact our business as we're in constant communication with these stakeholders to make sure we conduct appropriately.

## Suppliers

Suppliers are directly economically affected by Data Respons and indirectly affected by the company's focus on responsible business practices. We have sent a letter to our suppliers to ask them to join our journey to net-zero. This has opened a dialogue with our suppliers around how to face these challenges. Data Respons Solutions' suppliers have been asked to join the platform Integrity Next to document their progress in circular business/ carbon neutrality there.

## How the Stakeholder Dialogue was conducted

Data Respons aims to have an active dialogue with the company's stakeholders, as the conversation strengthens its relationship with and understanding of the society in which it operates. Stakeholder dialogue is also beneficial as it allows the company to detect, investigate and manage potential risks arising in its immediate surroundings. The stakeholder dialogue is a key objective in the GRI Standards and part of the GRI Management approach.

The company's approach to sustainability is based on the stakeholder dialogue. Data Respons Communications Department has facilitated the stakeholder dialogue, speaking to representatives from key stakeholder groups, including employees, customers, shareholders, and suppliers, and interviewing them. Data Respons will continue to keep an active dialogue with all stakeholder groups for future ESG-reports.

# STAKEHOLDER DIALOGUE

Stakeholder	Key Topic	How we engage
<b>Owners/Top management</b>	<ul style="list-style-type: none"> <li>• Skills development</li> <li>• Equal treatment</li> <li>• Legal and appropriate conduct</li> <li>• Information &amp; Data Security</li> <li>• Positive and professional corporate culture</li> <li>• Financial stability</li> </ul>	<p>Survey sent to four members of top management</p> <p>Interviews with management</p>
<b>EMPLOYEES</b>	<ul style="list-style-type: none"> <li>• Responsible purchasing</li> <li>• Code of Conduct</li> <li>• Gender equality</li> <li>• Human Rights</li> <li>• Human rights</li> <li>• Equal treatment</li> <li>• Skills development</li> <li>• Legal and appropriate conduct</li> </ul>	<p>Survey sent to representatives of employees</p>
<b>CLIENTS</b>	<ul style="list-style-type: none"> <li>• Work with agile and highly competent consultants</li> <li>• High level of service and good customer communication</li> </ul>	<p>Survey with randomly selected customers</p>
<b>SUPPLIERS</b>	<ul style="list-style-type: none"> <li>• Follow laws and regulations in terms of ethical business operations, human rights, and anticorruption.</li> <li>• Sell products and services in a way to keep competitive advantage</li> </ul>	<p>Supplier survey</p> <p>Sent supplier code of conduct</p> <p>Platform for improving on sustainability matters</p> <p>Ongoing communication in meetings, calls, etc.</p>

Relevance levels



## QUOTES FROM STAKEHOLDER DIALOGUE

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*Our employees reflect the diversity of our customers, suppliers and the environment. Young and older people, people of different origins and cultures work for us - people who are united by one idea: to find the best solution for our customers.*

*To achieve this, a wide variety of people pull together. Their diverse skills and competences, which have developed against the background of heterogeneous life contexts and experiences, support them in this.*

————— *Andreas Muench, managing director in Epos Cat* —————

*To feel that you can evolve, learning more and contribute more as a co-worker and as a person, developing skills is very important. Becoming stagnant leads to a decline in quality in what you deliver and a missing opportunity to add value to your self and your organization.*

————— *Jan Landmann, managing director IT Sonix* —————

*Since reaching net-zero carbon emissions is an important part in reducing the global warming, this is crucial to aim and achieve for. We should also act as an example for other companies within this area.*

————— *Arthur Schiefer, managing director IT Sonix* —————

*Diversity in our workforce is important to be regarded as a complete solution partner, and to foster innovation.*

————— *Jørn E. Toppe, managing director Solutions* —————

*Smart use of resources correlated with smart and cutting edge technologie. Thus, it is important to work with cutting edge technologie.*

————— *Florian Öhlschlegel, managing director Microdoc* —————

*Transparency is the foundation of trust.*

————— *Dirk Frobese, managing director in frobese* —————

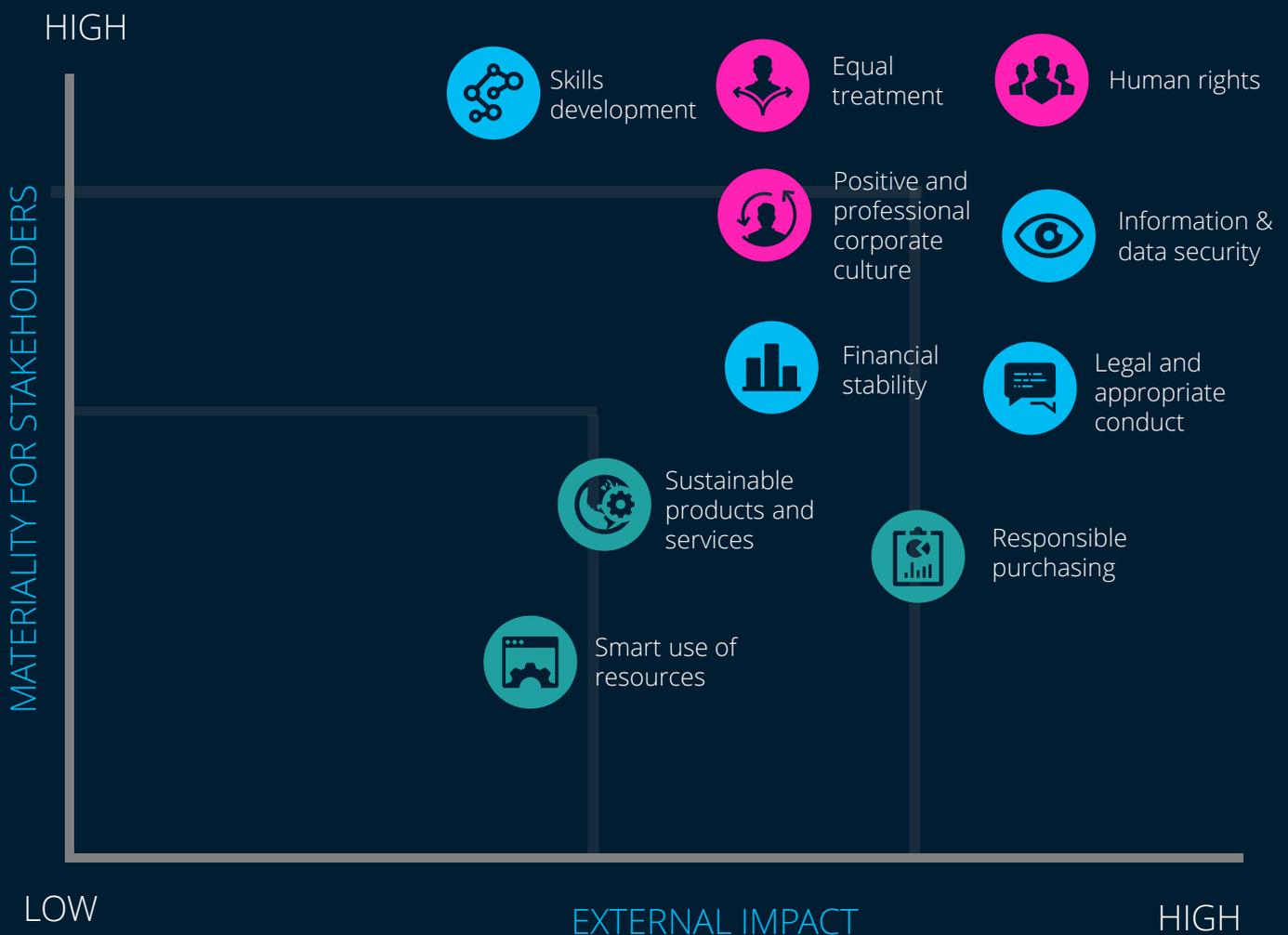
# MATERIALITY ASSESSMENT

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# MATERIALITY ASSESSMENT

The latest materiality analysis was completed in 2021 and essentially confirmed earlier assessments of the company’s most material sustainability aspects. The analysis is based on mapping aspects in two dimensions.

Firstly, the impact of various sustainability aspects of the external world was assessed. Secondly, the analysis identified the importance of sustainability aspects to Data Respons’ stakeholders (in this case, employees and clients) when they make decisions linked to the business.





# REPORTING ON MATERIAL TOPICS

## Topics in this chapter

- Environment
- Emissions
- Energy Use
- Materials
- Social
- Governance

# PROGRESS ON GREEN GROWTH

## Topics in this chapter:

- Emissions
- Energy use
- Circular economy
- Materials

# WHAT IS THE ENVIRONMENTAL FOOTPRINT OF THE TECHNOLOGY INDUSTRY?

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The total life cycle carbon footprint of the ICT sector is approximately 730 million tons CO<sub>2</sub> equivalent (Mt CO<sub>2</sub>-eq) or 1.4 percent of total global greenhouse gas emissions. Further, modern applications are almost always deployed over the cloud.

Data centers consume about 2% of global electricity today; by 2030, they could consume as much as 8%.

As for this report we have covered purchased electricity and purchased heating and cooling to report for our energy use. As we continue to improve our ESG-reporting, we will also consider cloud/ server footprint for the next reporting cycle.

As a technology company, our business areas are mostly focused on software development. Hence, we do not have a lot of emissions directly connected to our business. Our solutions companies on the other hand, produce hardware. In this part of our operation, we do have emissions and impacts on the environment that we aim to reduce. Further we have the possibility to directly and indirectly affect the environment by choosing sustainable technology projects.

Environment and climate-related risks have been assessed as low, and are connected to office operations and related purchasing, business travel and employee commuting. Data Respons' environmental programme is based on the company's environmental policy, targets and action plans. Linked to the target of a carbon neutral Data Respons by 2025, the company is working towards fossil-free transportation, fossil-free business travel and heating and cooling offices with renewable energy.

## Material use

Data Respons' material use in this report covers conflict materials. We aim to gain a complete picture of all materials Data Respons uses, and we have the goal to include materials like waste, iron, batteries etc. in the next report.

## Energy use: purchased electricity, heating and cooling

As we started to map our greenhouse gas emissions in 2019, we realized that we still have considerably high use of energy across the group. At the same time, we see that energy use is one of the categories where we most easily can make a difference. Some of our subsidiaries have already switched to renewable energy providers and hence reduced their energy emissions.

# CLOSING THE GAP TOWARDS A CIRCULAR BUSINESS MODEL

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## The (business) world needs to become more circular

A circular economy is the opposite of a linear economy. A linear economy is based on the extraction, production and use, and incineration or disposal of waste. In a circular economy, products must last longest possible, be repaired, upgraded and, to a greater extent, reused. The transition to a circular economy involves changes in design (design for circular economy), production, choice of production methods and consumption patterns. Digitization, use of services and sharing economy are key.

## Where we stand today and where we're headed

On a group level, Data Respons' business model is based on technology consultants selling knowledge and services to customers. We have reduced emissions from traveling, commuting and energy use. Further, we recycle all electronic devices.

**90% of our emissions come from production & transportation of produced products,** and that's where our biggest task lies. In the following years we plan to:

- Transport more products on ships instead of planes
- Optimize project management and make orders more efficient
- Implement Eco design (Up to 80% of product's footprint is decided in the design phase. (Innovation Norway).)
- Products need to be produced differently in future. Ideally, all components need to be replaceable.
- We will consider selling our specialized products as rental service instead of selling and disposing.
- Carry out Circular Economy and Eco-design workshops to map our current situation.
- Create and implement a circularity action plan.
- Fully implement Eco-design in all solution design phases. (Up to 80 % of product's footprint is decided in the design phase)
- Make circular and eco- design processes part of our management system.
- Prepare for compliance according to **Circular Economy standard ISO/TC 323** (ISO 59000-series). This standard is currently under development and is planned released during May 2023.

## Circular efforts we already have implemented are:

- **Sell more solutions with service contracts and upgrade-programs to secure extra-long lifetime** rather than disposing
- Modular design. Fewer components and parts, increase product life rather than dispose and entire product
- Use more sustainable, recyclable, or biodegradable, reusable, and cost-effective packaging for transportation.
- Select transport that the uses the lowest possible footprint.
- Further streamline logistics (transport) and production
- Creating solutions and products with low energy consumption and with the lowest possible manufacturing footprint
- Select recyclable materials in the products design phase.

# EMISSIONS

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## Topics in this chapter:

- Emissions
- Method: GHG Protocol
- Reduction of emissions

# Emissions



Every year, Data Respons conducts emissions mapping across the group.

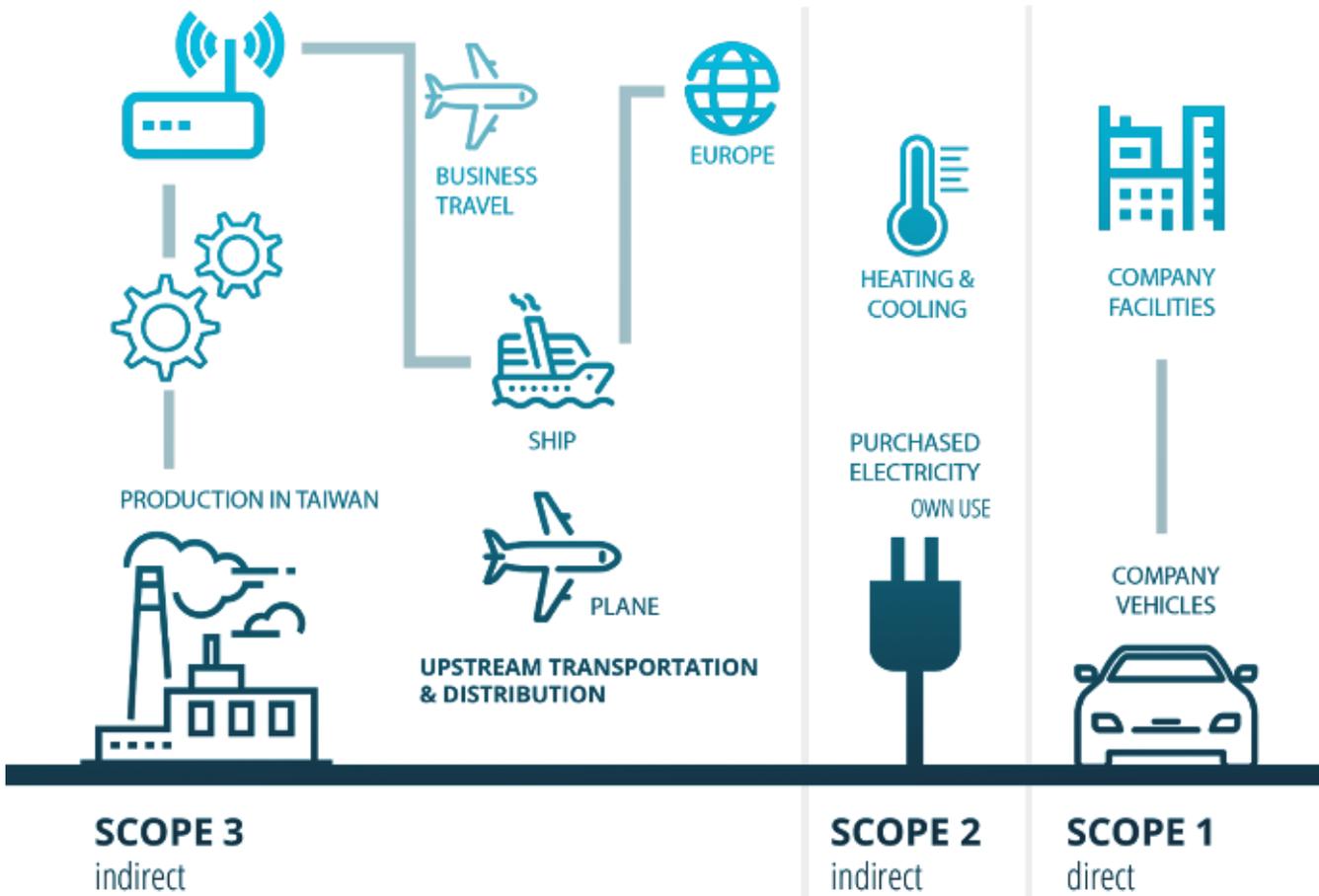
Our emissions report is derived from 2019 due to a delay in the data process. In our journey towards carbon neutrality, we have improved our emissions reporting and gathered extended data in 2020, compared to 2019. Consequently, we now see a much more detailed and probably more realistic picture of our environmental footprint.

Our emissions have increased considerably in this reporting period compared to the first reporting period. The reason is improved data quality, as we have now included all Scope 3 emissions (production of technology and upstream transportation) in our second emissions mapping.

Data Respons' emissions reflect our focused business areas. As we divide our businesses in R&D (Research and Development) services and Solutions, emissions reflect this proportionally. Our R&D subsidiaries typically have relatively low emissions as they work as software consultants and produce no physical products. Our Solution business unit on the other hand, deliver the whole supply chain from designing to producing hardware. We therefore see a completely different picture in this business segment and considerably higher emissions.

# Method GHG Protocol Standard

Our carbon mapping and environmental footprint has been checked and verified by a third party ([Endrava](#)) and follows the GHG-protocol standard, which provides the world's most widely used greenhouse gas accounting standard. The GHG emissions in this report are calculated based on activity data provided by Data Respons (e.g. number of flights and routes, amount of electricity consumed, number of laptops purchased, etc.), factors for GHG emissions provided by various databases (e.g.  $g_{CO_2e}/km$ ,  $g_{CO_2e}/kWh$ ,  $kg_{CO_2e}/kg_{bags}$ ).



In the calculations we distinguish between direct & indirect emissions.

**Direct emissions** (aka. Scope 1) are emissions from Data Respons' use of fuel for company vehicles.

**Indirect emissions are split in two categories:**

Scope 2 emissions are linked to electricity, heating and cooling of the office and storage facilities.

Scope 3 emissions are linked to buying goods and services, flights, shipping, getting goods delivered, servers and cloud-services.

# REDUCTION OF GHG EMISSIONS: HANDLE THE BIGGEST EMISSION FACTORS FIRST

## Production of technology

The by far biggest emission point is production of technology, which Data Respons has located in Taiwan. Production is ordered exclusively for Data Respons Solutions' customers. In 2020 we see that 70% of our group's emissions are in this category.

## Transportation and distribution of own products

The second biggest emission part is transportation and distribution of technology products from Taiwan to Europe, and distribution within Europe. These emissions are also exclusively for Data Respons Solutions' customers and represents 11.3 % of our group's emissions. Both production and transportation or distribution of own products are the two biggest emission segments. This is linked to Data Respons Solutions and represent 80% of our total emissions.

## Business travel

Business travel equals 5,2% of our total emissions. We have implemented in our sustainability strategy, that all domestic flights shall be reconsidered if necessary. If it's possible to take meeting digitally, this solution shall be preferred. Necessary flights shall be carbon-offset. This should always be the last option when a flight really cannot be avoided. Further, we request an individual travel policy in every daughter company.

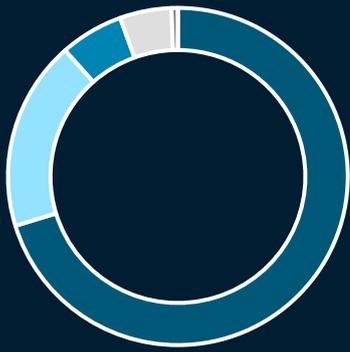
## Employee commuting

Besides production and transportation of technology, emissions from employees travelling to and from the workplace (by own fossil fuel-based or diesel cars), as well as company vehicles are a major part and stand for 7.3 % of the total emissions. When it comes to commuting, we see that the differences in geography and other work conditions are reflected in the individual needs for commuting.

In Germany, many employees live further away from the workplace and use diesel cars to get to work than in the Nordics. We also know that in some of the more rural areas in Germany, public transportation offers are not well enough developed to ensure everyone can use it in everyday life. Nevertheless, in some of our subsidiaries that benefit from being located in urban areas, employees get transfers for using public transportation.

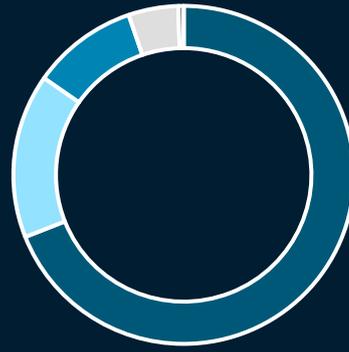
Data Respons has the ambition to support our employees to choose climate friendly transportation, like public transportation, bicycles or electric vehicles. Further, we have a policy that when a subsidiary plan to move to a new office, it shall strive to move to climate neutral buildings.

## CO2e in 2020



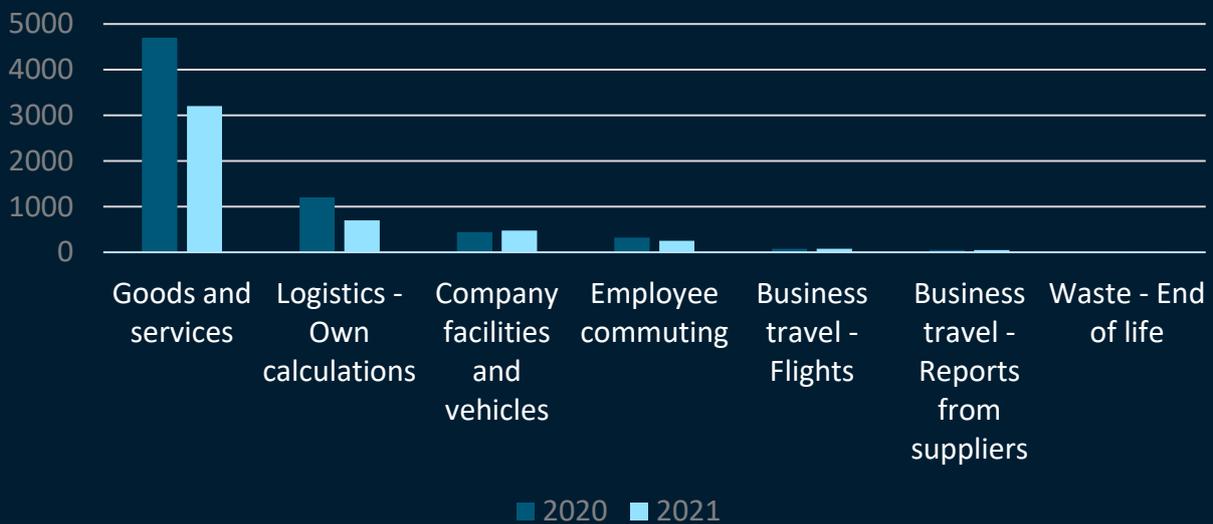
- Goods and Services
- Logistics - Own calculations
- Company facilities and vehicles
- Employee commuting
- Business travel - Flights
- Waste - End of Life

## CO2e in 2021



- Goods and Services
- Logistics - Own calculations
- Company facilities and vehicles
- Employee commuting
- Business travel - Flights
- Waste - End of Life

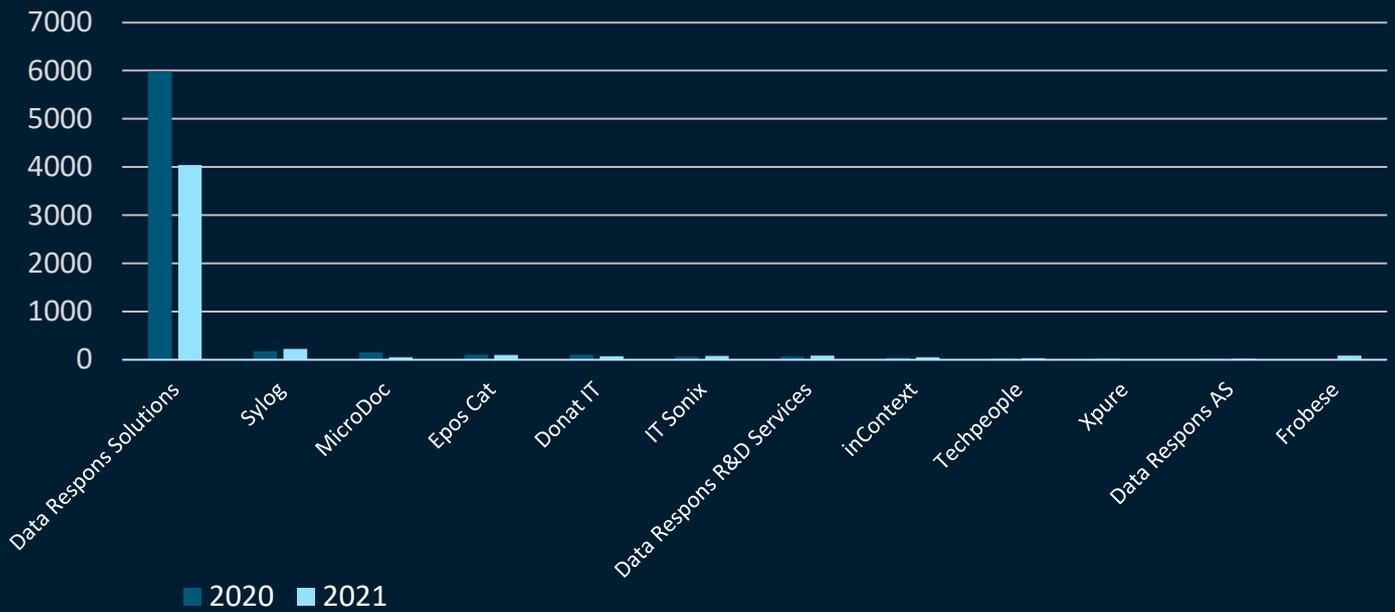
## Contribution per category



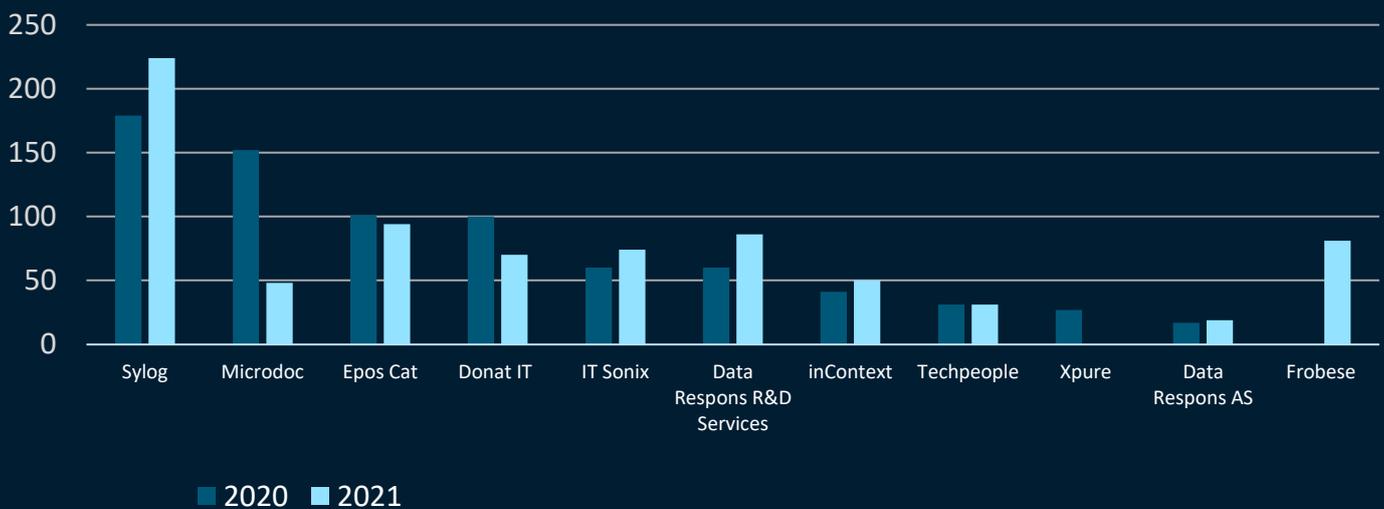
### \*Missing data in goods and services

inContext also has some emissions associated with the production of goods for resale to customers (upstream scope 3 – purchased goods and services). These are not included in the 2020 and 2021 emission totals, but should be included for next years' analysis. A first estimation of possible impact indicates that these would affect total emissions on the order of 1 % and hence will not significantly affect the total.

## Largest emissions from Data Respons Solutions

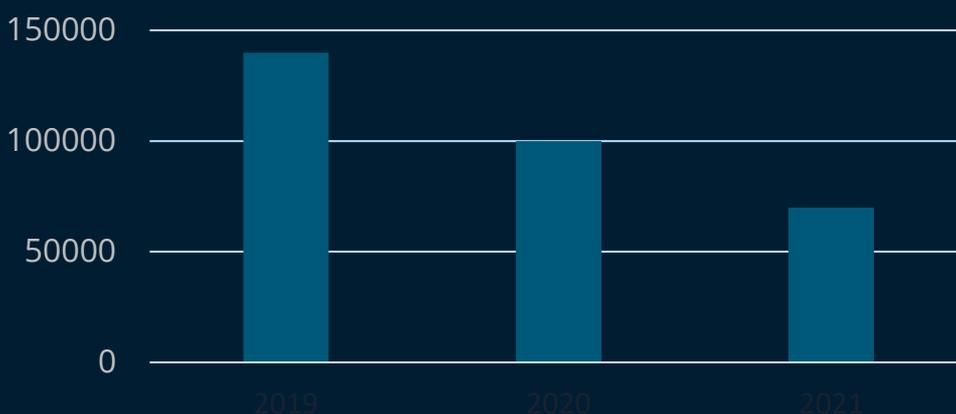


## Emissions excluding Data Respons Solutions

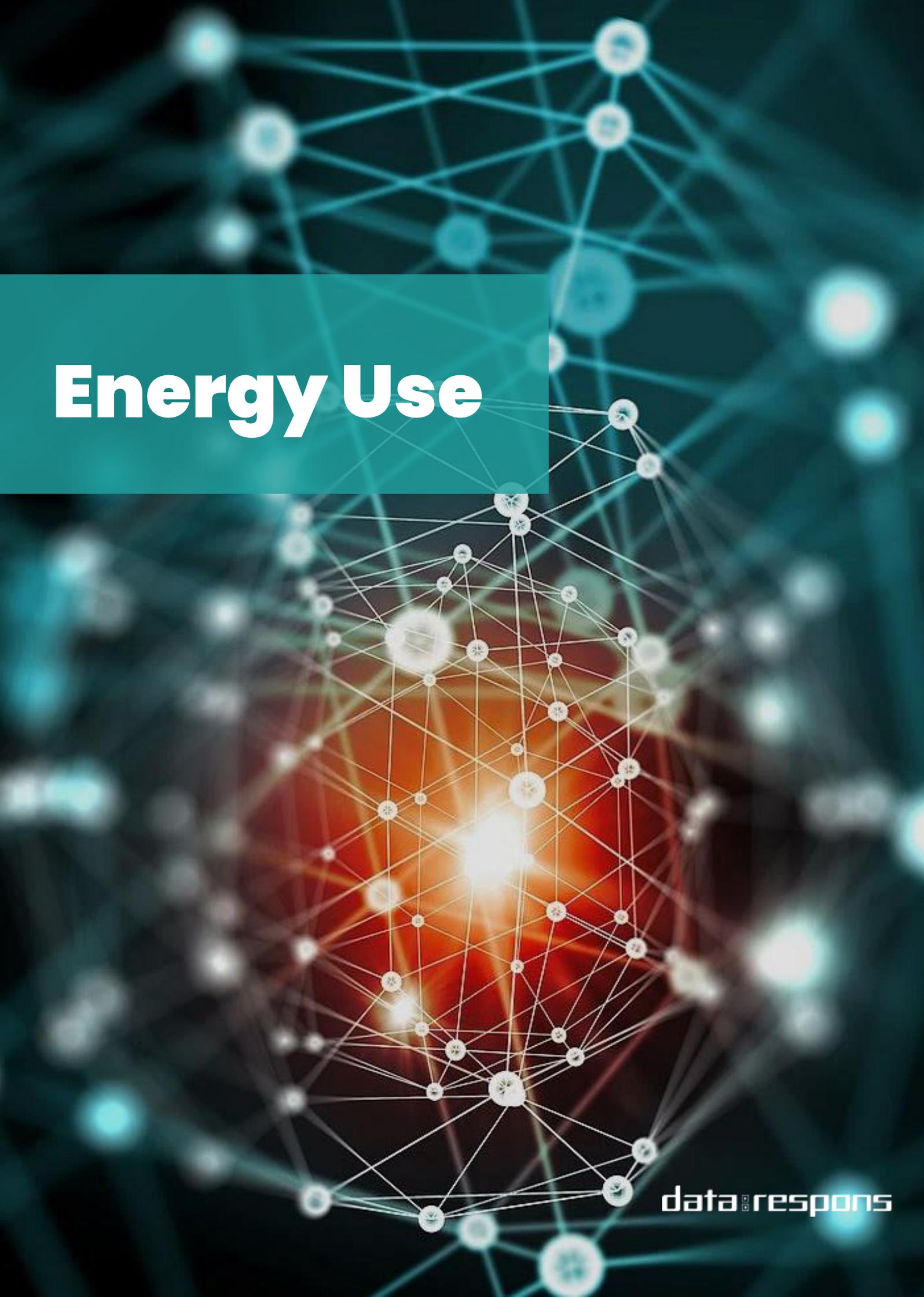


## Total shipped weight from Taiwan and China to Solutions

### Shipping weight (kg)



Due to global challenges with the lead time on components needed in Solutions' production, the shipped weight is drastically reduced in 2020 and 2021, compared to 2019. This has a direct impact on Data Respons' total emissions in 2020 and 2021 and since the activity level (contracts signed) is the same as in 2019, the emissions are expected to catch up in 2022 and in the following years.



# Energy Use

# ENERGY USE

Data Respons' second most significant impact on the environment is through energy use. Consequently, we have the ambition to switch to 100% renewable energy for purchased electricity for all offices.

This project started in 2020 and two of our daughter companies, Epos Cat and IT Sonix have already reduced their footprint considerably by buying energy solely from renewable sources.

Further, we are researching possibilities for renewable energy sources for production of technology in Taiwan.

## Furthermore, we do several actions our own:



Purchase renewable electricity for the energy supply in our offices



Smart heating/ cooling system that switches off in vacations/ weekends

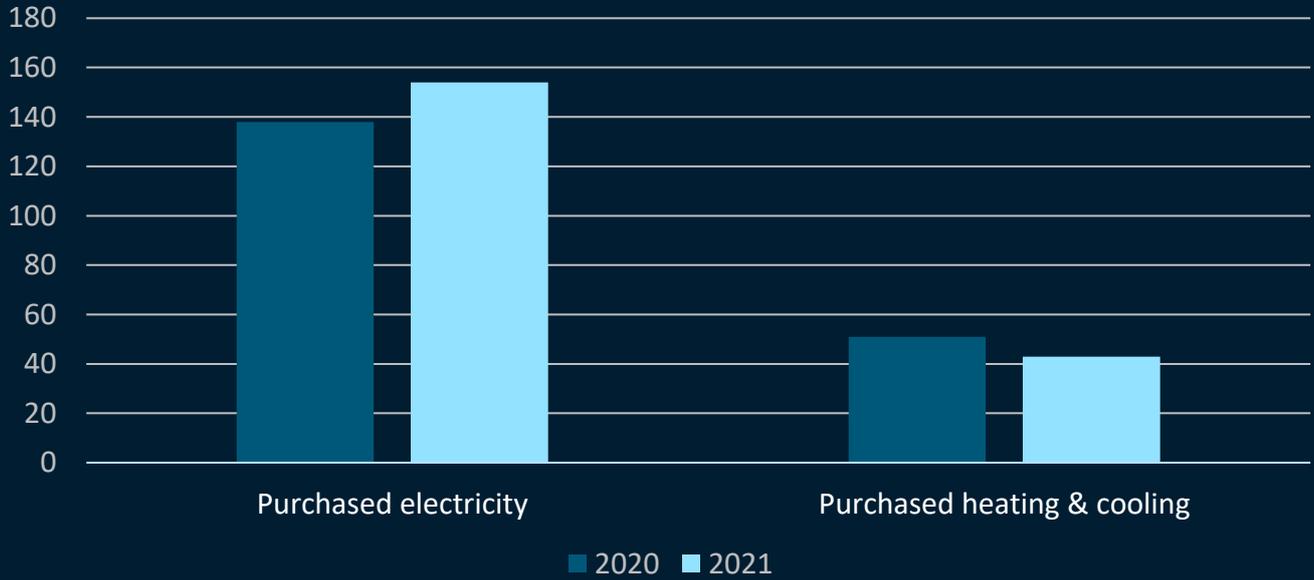


Switched to energy efficient lightning

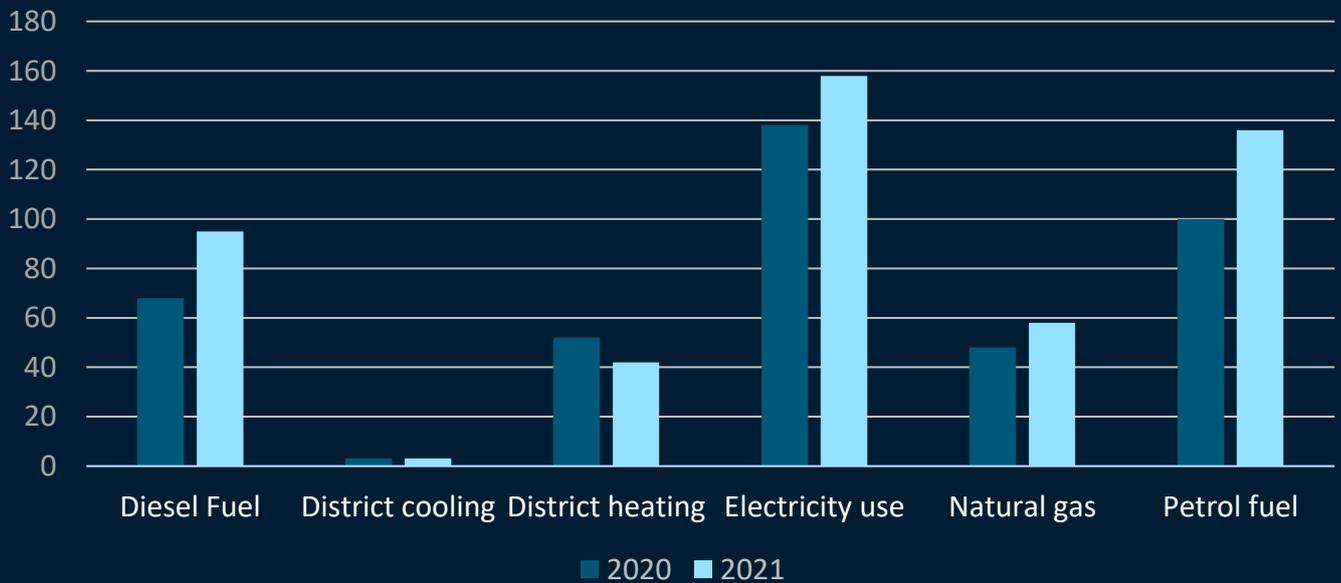
	2020	2021
<b>Scope 1</b>	215 tons CO2e/year	284 tons CO2e/year
<b>Scope 2</b>	189 tons CO2e/year	197 tons CO2e/year
<b>Scope 3 - Upstream</b>	6353 tons CO2e/year	4333 tons CO2e/year
<b>Total</b>	6758 tons CO2e/year	4815 tons CO2e/year

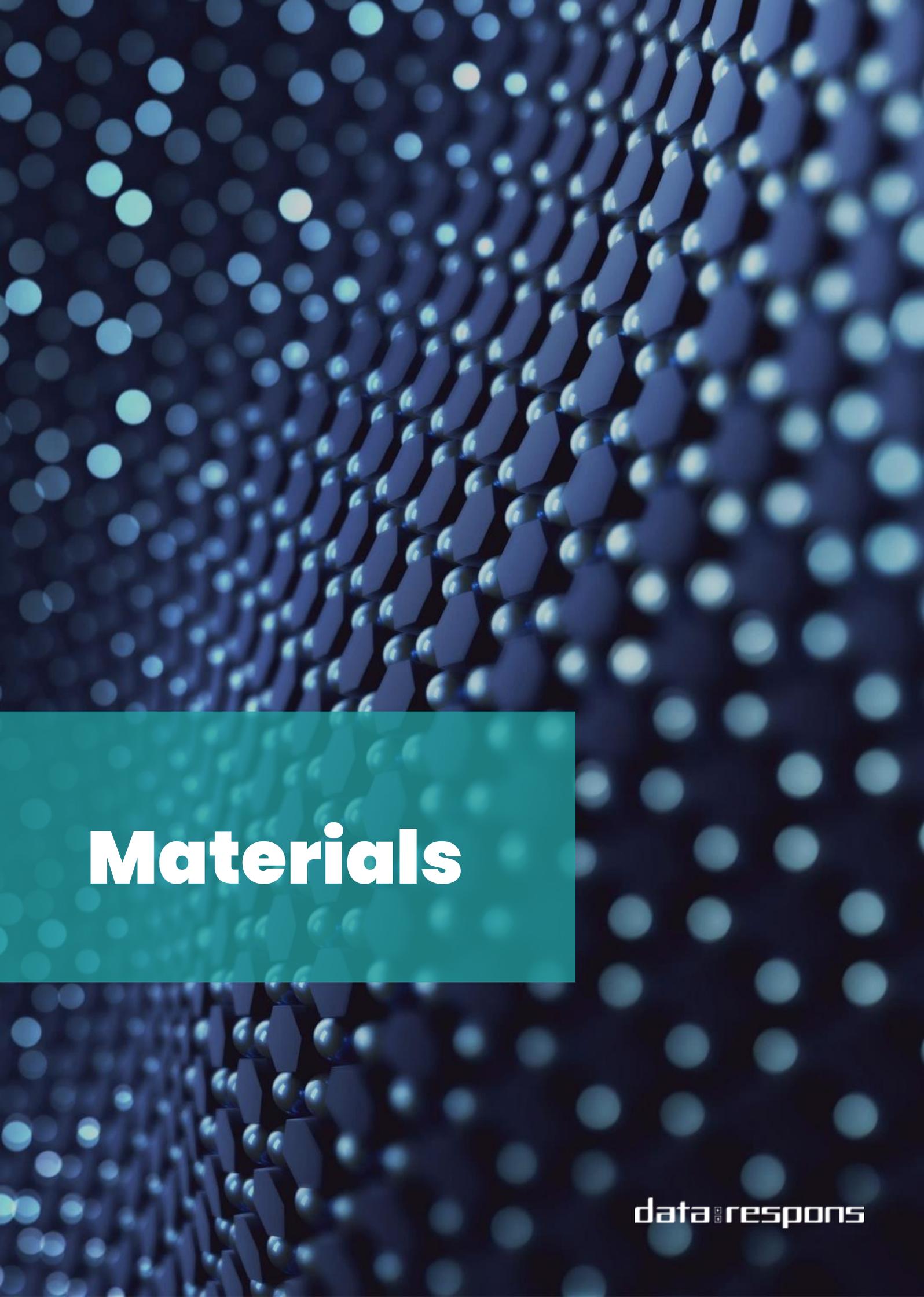
# ENERGY USE

## Scope 2: Energy use



## Company facilities and vehicles





# Materials

# MATERIALS

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As a technology company, operating mainly within software services, we do not have comprehensive use of materials. Nevertheless, we aim to gain a complete picture of all materials we use and our waste footprint.

We have the goal to include materials like waste, iron, batteries etc. in the next report.



## WE AIM TO:

- Follow up production in Taiwan and
- 



- Increasingly ensure that production is as energy efficient as possible and products are as reusable as possible
- 

As a supplier of products and solutions containing minerals, Data Respons is aware of the responsibility we have towards countries and their inhabitants where the minerals are mined. Data Respons has therefore developed a conflict minerals policy.

## DATA RESPONS IS COMMITTED TO:

- Not knowingly procure any component, product or solution containing conflict minerals from conflict sources.
- Have an open dialog with customers, partners and suppliers regarding conflict minerals.
- Request our partners and suppliers to avoid use of conflict minerals from conflict sources in their components, products and solutions.
- Request our partners and suppliers to provide conflict minerals policy and detailed declarations regarding the mineral content in the components, products and solutions.
- Request our partners and suppliers to notify their downstream suppliers not to use conflict minerals from conflict sources.
- We have started to implement eco design for our Solutions products.



# ENABLING PEOPLE & CAUSES

data  respons

# HUMAN RIGHTS

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Respecting human rights is a fundamental part of Data Respons' corporate responsibility and is vital to the sustainable operation of our business. We are committed to respecting fundamental human rights in our operations, our value chain, and in the communities where we operate. We use our influence to promote human rights and work to ensure that no abuse of human rights takes place in our operation or value chain.

We recognize that we can contribute to the fulfilment of human rights. We have a responsibility to prevent, mitigate, and address adverse human rights impacts in our own operations but we also use our leverage to promote respect for human rights in our value chain.

**Our commitment is based on our company values, our Code of Conduct, and our Supplier Code of Conduct**

## Our actions to protect human rights

- We have zero tolerance for bullying, unwanted sexual attention or harassment
- We promote diversity with respect to employee gender, age, ethnicity, physical abilities, personality, skills, experiences and backgrounds.
- We respect employees' rights to privacy. The General Data Protection Regulation (GDPR) became Norwegian law in 2018.
- All our employees have the right to join or not join a labour union.
- We conduct our activities without discrimination, we treat our employees fairly and compensate fairly by offering competitive salary and benefit packages.
- We ensure that we pay the same rates for same type of work regardless of gender, culture or other origin.
- Everyone who is employed by us works here of their own free will in alignment with the ILO Declaration.
- We have our own Supplier Code of Conduct, which our suppliers are obligated to follow. Suppliers must abide by the same rules as those we have laid down for our own employees.



# Positive & professional corporate culture

# POSITIVE & PROFESSIONAL CORPORATE CULTURE

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Data Respons is truly a tech and customer driven company, based on a people-centric culture. We strongly believe in a decentralised and dynamic group structure with empowered local management and employees.

Across our portfolio of companies there are numerous brand building activities and recruitment through, for example, participating in conferences, seminars and courses. The company recruits globally and offers flexible and individualised terms of employment and centrally located offices to attract the right employees.

Keeping our employees healthy and ensuring their well-being is important to Data Respons. Better health fosters lower sick leave and a joyful work environment, which again results in improved performance at work – supporting our high-performance culture. Our employees are our most important resource and it's our responsibility to make sure they have the best possible working conditions. In this we follow our corporate values to the letter.

**Examples on executing on those values are:**

## BEING GENEROUS:

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Training facilities and workouts at the office

## TAKING RESPONSIBILITY:

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Sponsored bikes/ e-bikes to promote sustainable commuting

## TO PERFORM:

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Lifelong learning (academy, study programs etc.) Sharing knowledge on our internal communication platform.

## HAVING FUN:

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Team building, weekly social gatherings and e-sport events.

# POSITIVE & PROFESSIONAL CORPORATE CULTURE

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## A healthy and safe working environment

Keeping our employees healthy and ensuring their well-being is important to Data Respons. Better health fosters lower sick leave and a joyful work environment, which again results in improved performance at work – supporting our high-performance culture.

## Working Environment Committee or appointed safety representatives

The Data Respons companies have varying sizes and needs for working environment/ safety representatives. Therefore, each subsidiary is responsible to manage their working environment committee or appoint safety representatives.

## Health and safety risks

Data Respons' greatest health and safety risks are repetitive strain injuries and stress-related disorders. Corporate culture encourages physical movement and variation in working posture. Aimed at minimising stress, Data Respons strives to maintain an open, communicative, reassuring and transparent culture. The company's employees are provided occupational health services according to their individual needs, as well as tools and equipment to prevent repetitive strain injuries, for example. In the Data Respons group were in total two work related injuries reported in 2020. None were considered serious.

## 2021 saw lower turnover and higher sick leave

The turnover in the group decreased slightly in 2021. However data shows that the turnover fluctuates around 15% so the decrease is not necessarily driven by a specific variable. However we think this is a positive response from all the work that been done in 2021 to create a even better workplace experience.

13,9%

**TURNOVER**  
in 2021

5,9%

**SICK LEAVE**

**Our sick leave increased in 2021, we attribute that to the pandemic and the highly infectious omicron virus**

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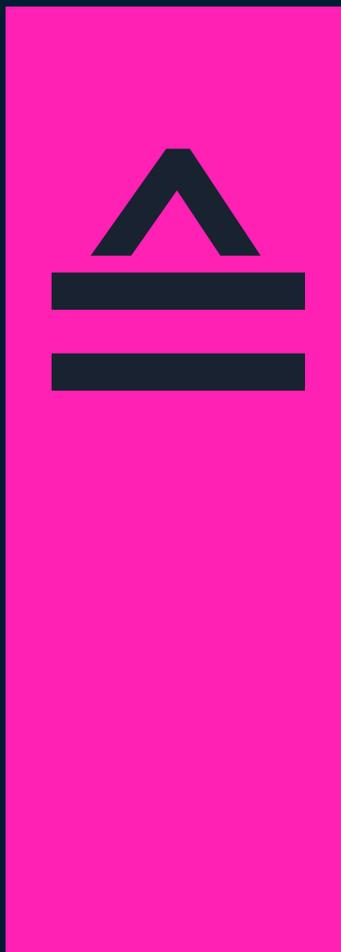
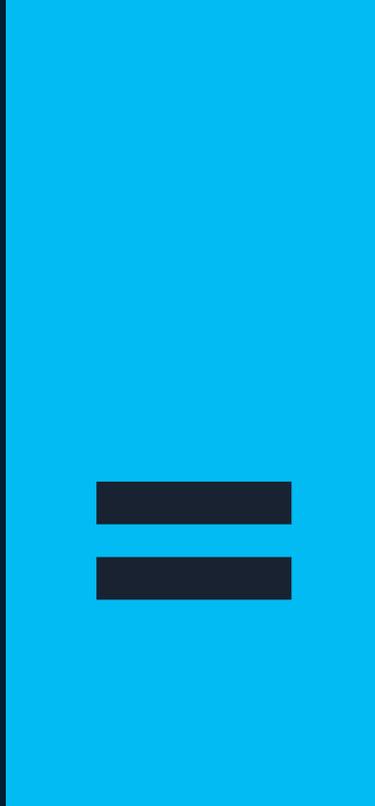


# EQUAL TREATMENT

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## Promoting equal opportunity

Data Respons is committed to providing equal employment opportunities and treating all employees fairly and with respect. Data Respons' employees and business units shall only use merit, qualifications and other professional criteria as a basis for employee-related decisions, such as recruitment, training, compensation and promotion. We strive to develop programs and actions to encourage a diverse organisation based on the principle of equal opportunities.



## Equal pay

In Data Respons, the practice is equal pay for work of equal value – regardless of gender, ethnicity, religion, sexual orientation, family conditions or disability. Salary and terms of employment for comparable positions are the same for women and men. Recruitment, promotion and development of the employees are based on merit and equal opportunity regardless of ethnicity, religion, gender, age, national origin, sexual orientation, marital status and disability.

# DATA RESPONS STRATEGY FOR DIVERSITY

Diversity, with respect to both gender and ethnicity, can offer significant competitive advantages. Although achieving a gender balance is challenging in a world with few female computer science engineers, the group works to promote the profession among young engineers and strives to increase the share of female engineers and encourage female leaders.



*Promoting a better gender balance in a male dominated industry is one of our key priorities,*  
Kenneth Ragnvaldsen, CEO, Data Respons

**We increased the number of women from 20% to 21% in 2021, and we increased the number of women in leading positions from 25% to 32%.**

## **Working to get the right balance of specialists**

Since Data Respons was founded there has been a strong commitment to fostering a culture of diversity and inclusion, and this commitment has only grown stronger as we included more companies, nationalities and cultures into our company. The Data Respons Code of Conduct helps govern issues such as fair employment, diversity, discrimination, harassment and health and safety. All companies in the Group are obliged to adopt and implement the Code to ensure a uniform approach to these issues across the Group. Discrimination, bullying or harassment is not accepted, and employees are asked to report incidents of such behaviour to their immediate supervisor or the employee representative.

21%

**WOMEN**  
in 2020

32%

**WOMEN**  
in leading positions

2<sub>out of</sub> 3

**BOARD MEMBERS**  
are women

# Skills development



# SKILLS DEVELOPMENT

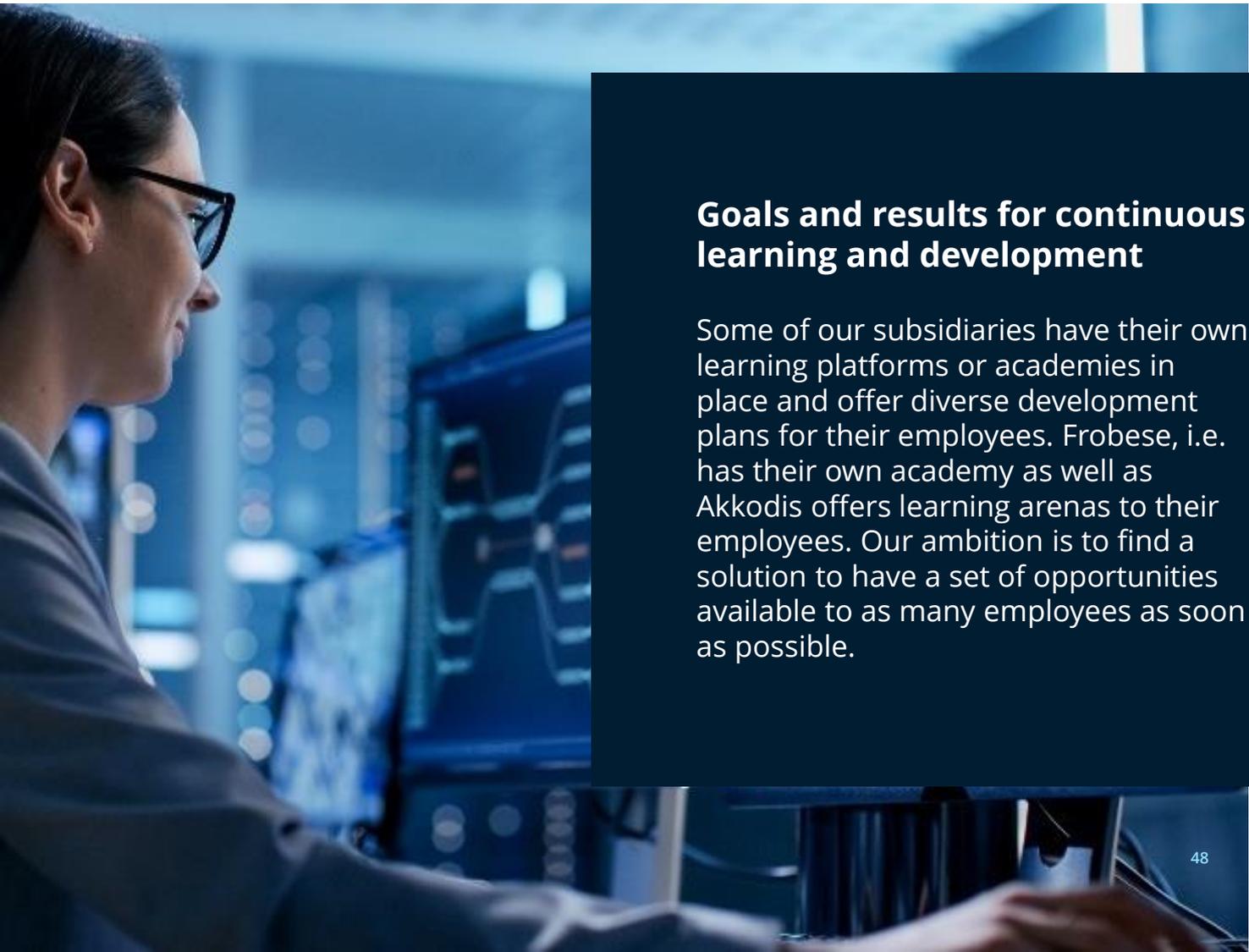
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## Employee development

Data Respons is a workplace that devotes a great deal of energy to attracting, developing and retaining skilled and creative colleagues. Colleagues and culture are essential parts of the company's strategy, with focus on skills, innovation and long-term leadership. The company is an arena of skills, and each employee ultimately owns their development. Data Respons shows the way by creating clear development paths and offering a carefully chosen range of skills-enhancing activities in our specialist areas.

At Data Respons, employees gain experience from different industries, companies and organisations. They also have opportunities to work across the entire field of IT and develop in various roles. Above all, they learn in client assignments – every single day, we are working in the thick of the digital revolution. That is why the breadth and development potential that Data Respons can offer are very special indeed.

All subsidiaries have individual expertise and needs. Consequently, a solution for all does not fit our need. We have decided to pass the responsibility to create development plans for every employee to each subsidiary. Each company is responsible to handle recruitment, onboarding and continuous development plans in accordance with Data Respons values.



## Goals and results for continuous learning and development

Some of our subsidiaries have their own learning platforms or academies in place and offer diverse development plans for their employees. Frobese, i.e. has their own academy as well as Akkodis offers learning arenas to their employees. Our ambition is to find a solution to have a set of opportunities available to as many employees as soon as possible.

data:respons  
**Tenk  
Camp**



# Sponsorships

**Girls Tech  
Fest 2022**

# DATA RESPONS ENGAGES & SUPPORTS THE NEXT GENERATION

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## *Enabling the young*

Young people are our future and we want to be a part of giving coming generations the best starting point possible and the ability to grow and prosper into educated, healthy and valuable individuals. This is why Data Respons have set up a fund called Enabling the Young. The fund will support a wide range of efforts where young people benefit, and we seek worthy causes where we feel assured that the support given will go more or less directly to the cause with very few administrative expenses.

### **Enabling children in low-income countries**

An estimated 617 million children and adolescents around the world are unable to reach minimum proficiency levels in reading and mathematics – even though two thirds of them are in school. This learning problem is the greatest global challenge to preparing children and adolescents for life, work and active citizenship according to UNICEF.

### **Data Respons support various organisations**

One of our long lasting initiatives is The Society for Street Children in Nepal, a non-profit fund-raising society working for the accommodation for street children in Nepal, with highest priority is given to girls since they in particular run the risk of human trafficking. The Society will also provide education for children and young people who would otherwise have no access to education. In addition, the Society will provide food for children still living on the streets.

Another example is the humanitarian organisation “On Own Feet”, which works with children in war-torn countries. The organisation provides school materials, builds and reconstructs schools, provides medical kits to women’s clinics and more. Data Respons have supported the organization for nearly 20 years

### **Scholarly programs**

Several of our subsidiary companies support students with a scholarship program during bachelor or master studies to encourage more students to choose an education within STEM (science, technology, engineering and mathematics.)

### **Sports clubs**

From the start, physical activity have been an important part of the culture in Data Respons. Enabling young people to perform, whether it is in sports, education or other aspects of life, is deeply embedded in our company values. Sport conveys many strong values that make up both a lively everyday life and a strong corporate culture: namely team spirit, a clear strategy and, above all, a large portion of emotion and pure passion for a common cause. Data Respons companies sponsor both small local teams and youth national teams within various sports such as cycling, ice hockey, football and hand ball.

# DATA RESPONS SPONSORSHIPS



## Increasing cyber security awareness through Hackathons



### TEAM RYNKEBY

Team Rynkeby is a European charity cycling team. Every summer the team cycle to Paris to raise money for seriously ill children.

## World Usability Day



The event is arranged by our subsidiary IT Sonix Custom Development GmbH and this year's theme is "Design of our Online World: Trust, Ethics and Integrity".



## Girl Tech Fest & Tenk Girl Camp

We need more women in technology - because we need more people and greater diversity within the tech industry. That's why we proudly support the events Girls Tech Fest and Tenk Girl Camp. Both are organized in Oslo by the Oda Nettverk, Tenk



## Gaubarn i Nepal (Homeless children in Nepal)

Data Respons is helping Gaubarn i Nepal enabling opportunities for young girls in one of the poorest countries in the world. Nepal is a small country in Asia and home to many of the world's most famous mountains. However, it's also among the world's top ten poorest countries. Approximately 40% live below the poverty line and 47% of the population is unemployed.

# ENSURING PROFFESIONAL BUSINESS & CONDUCT



data:respons

# GOVERNANCE

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Building trust through good corporate governance is key and part of the licence to operate for every company. Data Respons continues to identify ways to improve on topics like transparency, supply chain management and professional conduct. With a growing number of companies, employees, locations and customers it is very important to us that we continue to build a professional and responsible corporate culture.

## Ethical guidelines

In 2019 we made a comprehensive Code of Conduct that was launched in 2020 together with an updated whistle-blower service. The Data Respons Code of Conduct is sent to every new employee when in their first week of work. Everyone is requested to read it and follow up with their supervisor if something remains unclear. The supervisor has the responsibility to follow up that the Code has been read and understood.

Also, we launched a Supplier Code of Conduct Principles in 2019 and have scheduled supplier audit as soon as possible, most likely after the pandemic when travelling to Asia is possible again. The Supplier Code of Conduct sets out the minimum standards in key areas including business ethics and anticorruption, as well as human rights, labour conditions and sustainability for Data Respons' suppliers. Failure to comply with these requirements may result in the termination of the business relationship.

## Risks and opportunities

Ethical risks includes for instance employee failure to comply with national regulations, Data Respons' Code of Conduct or employee involvement in corruption, bribery or other irregularities. Such actions may damage the brand or lead to legal sanctions and fines. Data Respons does not have any operations in high-risk countries. Regardless, running a professional corporate culture is very important to us.

## Whistle blowing

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns, and report suspected violations. All employees, suppliers and partners can also use Data Respons' whistle-blower channel, where concerns can be reported anonymously.

Any anonymous alerts will be handled by the group top management through the whistleblower platform. In any case the alerts are about the top management the Board of directors will handle the alerts.

[Information about whistle blowing can be found in our Code of Conduct that is available on our website.](#)

## As an international company we strive to:

- Contribute to quality education in our communities
- Promote decent work throughout the value and supply chain
- Foster economic growth in our communities
- Strengthen local communities and institutions through capacity building on human rights and good governance

# DATA SECURITY & INTEGRITY

## Cyber Security Awareness

IT-security and cyber security awareness has probably never been more relevant, and it is very much a shared responsibility for everyone in the company.

Trusted research & cyber security reports state that human error is the major contributing cause in 95 % of all breaches. In other words, attentive, observant, and alert employees are instrumental in helping us stay safe.

### Actions:

- Regular password check-ups by a third party
- Implemented multi-factor authentication
- Using cloud services that hinder too much data and information being stored locally
- Dedicating every October to raising cyber awareness
- Using internal events like hackathons to focus on IT security challenges and solutions
- Taking our own medicine by implementing our cyber awareness offerings internally, such as fake email campaigns, fake Wifi hotspots and fake QR codes to train employees to recognize potential threats.

## GDPR

Under the GDPR, Data Respons has firm legal requirements to protect against personal data breaches and specific timelines within which to report and communicate applicable breaches to affected personnel. The GDPR requirements extend to all vendors that Data Respons uses to collect, store and process personal data on its behalf. Data security and integrity is managed at Data Respons through a combination of Group-wide and complementary daughter company policies and processes. Information security is managed within each subsidiary with oversight at Group level.

### Actions:

- Data Respons have made an updated Personal Data Protection Policy together with a website notice policy.
- In 2022 we are also preparing for an internal communication campaign on personal data protection to ensure our employees act and react correctly to data requests and data gathering.

# Activity & Disclosure Act

## New reporting requirements in Norway

Norway recently introduced a new law that requires all Norwegian companies with more than 50 employees to report on any difference between men and women when it comes to pay, leading positions, parental leave and unvoluntarily part time work.

As an international company with its headquarters in Norway we have started to report on any gender difference by our Norwegian subsidiary, Data Respons R&D Services, that has more than 50 employees.

We aim to use this reporting exercise to create a template for reporting and a case for awareness that we can export to our other European operations. Operations that do not have the same requirement to reporting, but we believe it still is a valuable exercise we will conduct through our group for the 2022 ESG report.

When it comes to parental leave there are too few data points to make a matrix. This due to the high number of junior developers, which makes the number of persons on parental leave very low.

Data Respons R&D Services also have no employees that work part time.

## Equal pay

It is the individual employee's role, competence, experience level, effort and performance that determines the salary level.

All employees are part of the same individual the follow-up system and compensation assessments, where we make sure to adjust employees in comparable roles.

In the table below you can see the average salary level for men and women in different positions.

We hire graduates with exactly the same salary, regardless of gender, and monitors statistics / data to ensure comparability throughout his career.

The differences that exist at salary level is a result of variations in education, experiences, performance, effort and role in the company - and not a question about gender, ethnic background or other discriminatory criteria. Differences in working hours also have an effect.

Data on average pay from 2021 shows that junior women is as well or better paid than their male counterparts. In the more senior categories, the women are younger and have less experience, thus also have a lower salary than their male counterparts, which all have more experience.

## Average pay between men & women

	2021	2021	2021	2020	2020	2020	2019	2019	2019
	Average pay Women	Average pay Men	Average pay	Average pay Women	Average pay Men	Average pay	Average pay Women	Average pay Men	Average pay
Management	80 %	107 %	100 %	81 %	103 %	100 %	78 %	104 %	100 %
Specialist Dev Engineers	84 %	101 %	100 %	N/A	100 %	100 %	N/A	100 %	100 %
Senior Dev Engineers	100 %	100 %	100 %	105 %	99 %	100 %	103 %	99 %	100 %
Dev Engineers	102 %	100 %	100 %	102 %	100 %	100 %	98 %	100 %	100 %
Administration	100 %	N/A	100 %	100 %	N/A	100 %	100 %	N/A	100 %
Total	102 %	100 %	100 %	99 %	100 %	100 %	94 %	101 %	100 %

# The Transparency Act

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## Norway's new Transparency Act

The date for Norway's new Transparency Act. is approaching (July 1, 2022) and our work to ensure compliance has begun.

The Transparency Act applies to companies that are either resident in Norway and that offer goods and services in or outside Norway. It also applies to larger foreign companies that offer goods and services in Norway, and that are liable to tax to Norway pursuant to internal Norwegian legislation.

Per definition, The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

## Due Diligence & risk assessment duty

The Act requires from Data Respons that we carry out Due Diligence and risk assessments relating to Human Rights and decent working conditions within our own business and supply chain. It must be published on the company's website and the public's request for information must be responded to no later than 3 weeks.

We are implanting these requirements for our Norwegian companies and will roll it out in Europe as soon as it is required.

## Supply chain transparency

Compliance, standards and regulations can be complex and are constantly changing Their intention is holding companies not only responsible for their own actions but extending it to throughout their supply chain.

To meet new regulatory requirements, reduce risk and to ensure transparency, we have implemented Integrity Next's cloud-based platform to enforce both compliance and sustainability throughout our supply chain.



# Responsible purchasing

# RESPONSIBLE PURCHASING

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Data Respons' success is dependent upon the cooperation from our business partners – suppliers, customers, contractors, agents, distributors, consultants or joint venture partners and others. Our business partners are expected to comply with all applicable laws and regulations.

Suppliers that have a direct contractual relationship with Data Respons should adhere to the principles set out in Data Respons' Supplier Code of Conduct. We aim to use our purchasing power to actively promote positive change across our value chain.

## Risk assessments

We must exercise caution when entering into agreements with intermediaries, i.e. business partners who are acting on Data Respons' behalf, which may include agents, distributors, and resellers, as Data Respons may be held responsible for the actions of such intermediaries. For the same reason, we must be vigilant in exercising oversight and supervision of such intermediaries throughout their engagement with us.

Our intermediaries shall follow all applicable laws and regulations and are expected to adhere to Data Respons' Code of Conduct. It is our responsibility to ensure that intermediaries understand Data

Respons' Code of Conduct and our requirements on environmental impact.

This includes the manufacturing process, choice of materials, transport and working conditions. We rely on the supplier's disclosures concerning environmental impact and work environment.

We carry out risk-based integrity due diligence processes to ensure that the business partners' reputation, background and abilities meet our standards. All Data Respons suppliers must adhere to our Supplier's Code of Conduct, which aligns with the Data Respons Code of Conduct in all material respects, including environmental guidelines. Corporate department has conducted the risk assessment.



***We continue to optimize our supply chain and production processes to make sure our products are produced with the least possible CO2-emissions.***

***A part of this process is to look into purchased energy for production in Taiwan and what possibilities we have to influence there. We also seek to select products that are sustainable over time in that, for example, all or part of the product can be reused,***  
Sebastian Eidem, CCO in Data Respons



# Legal & appropriate conduct

# LEGAL & APPROPRIATE CONDUCT

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## **Ethical guidelines and responsibilities**

Data Respons does not tolerate any form of corruption. We are committed to complying with all applicable laws and regulations enacted to fight corruption and bribery . We prohibit payments of bribes and kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Data Respons is opposed to any form of money laundering and has taken the relevant measures to prevent financial transactions that are of criminal intent. Data Respons complies with the governmental guideline on anti-corruption in Norway and applies it to all daughter companies and works actively to combat corruption and unethical practices. The CEO of Data Respons, Kenneth Ragnvaldsen, bears the ultimate responsibility for ethics and anti-corruption at Data Respons. Further, the CEOs in each subsidiary, bear the responsibility in their companies.

## **Guidelines for employees**

Employees must not give or receive gifts, benefits or bribes. Employees are not allowed to obtain or retain business or other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary. Employees shall not, in the conduct of your work for Data Respons, request, accept or receive any improper advantage that may influence your decisions.

Non-compliance will be treated as a serious violation and a disciplinary matter.

Employees shall be protected against any sanctions from Data Respons or any Data Respons representative for refusing to participate in any action that is or can be perceived as corruption, bribery or facilitation payment.

This information can be found in the [Code of Conduct on our website](#).

## **Independence and political affiliations**

Data Respons is politically independent and does not sponsor political organisations.

**FIND MORE INFORMATION IN OUR**  
[Code of Conduct on our website.](#)



# Human rights

# HUMAN RIGHTS

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## Modern Slavery Act

We support the principles underlying the Universal Declaration of Human Rights, the UN Global Compact and ILO's eight core conventions. Our human rights policy is based on the UN Guiding Principles on Business and Human Rights.

Data Respons' business is heavily dependent on human resources. This entails risk linked to discrimination based on gender, sexual orientation, ethnic origin, religious identity, political affiliation, disability or age. Through our own Code of Conduct and our Supplier Code of Conduct we have set out strict guidelines against anything that violates human rights. In addition, we do regular supplier audits. Data Respons' management works continuously to ensure that all operations follow the company's Code of Conduct. Everyone must show respect for the individual and their privacy and dignity.

Our main business operations are located in Europe where we consider human rights to be assured in working environments. However, we also have a location in Taiwan where we produce technology. Data Respons has conducted quality assessments there in 2019 and 2020 to make sure human rights are assured.



## Relevant policies

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- **Code of conduct**

(Data Respons companies and employees must comply)

- **Data Respons Supplier Conduct Principles**

• **United Nations 10 principles** (Data Respons companies, employees and partners must comply)

- **Data Respons Conflict Mineral Policy**

# Appendix: Risk assessment

# RISK ANALYSIS

Market and operational risks	Description	Action
<b>Capacity utilisation risk</b>	Data Respons' revenues are highly dependent upon the number of consultant hours sold. Reduced demand for consultant hours affects capacity utilisation and may be caused by any number of factors, including economic downturns and/or lacking the right consultant skills. Moreover, there is risk that clients may in some cases discontinue projects at short notice, which in turn may prevent Data Respons companies from immediately occupying the consultants involved in other assignments.	The Data Respons group is developing its business and deepening expertise in areas where demand is growing and is expected to continue growing for many years ahead. The group's services cover the entire project life cycle and consultants are equipped to successfully take on various roles. Employees are continuously further developed. Our companies also work with a large number of sub-consultants so that capacity can be adjusted to the current state of the economy and variations arising from our clients.
<b>Ethical risks</b>	Ethical risks include employee failure to comply with national regulations, Data Respons' Code of Conduct or employee involvement in corruption, bribery or other irregularities. Such actions may damage the brand or lead to legal sanctions and fines.	All Data Respons new employees are required to read the company's Code of Conduct.
<b>Environment and climate-related risks</b>	As a service company, Data Respons has relatively little environmental and climate impact. Environment and climate-related risks have been assessed as low, and are connected to office operations and related purchasing, business travel and employee commuting.	Data Respons' environmental programme is based on the company's environmental policy, targets and action plans. Linked to the target of a carbon neutral Data Respons by 2025, the company is working towards fossil-free transportation, fossil-free business travel and heating offices with renewable energy.
<b>Health and safety risks</b>	Data Respons' greatest health and safety risks are repetitive strain injuries and stress-related disorders.	Our corporate culture encourages physical movement and variation in working posture. Aimed at minimising stress, Data Respons strives to maintain an open, communicative, reassuring and transparent culture. The company's employees are provided occupational health services according to their individual needs, as well as tools and equipment to prevent repetitive strain injuries, for example.
<b>Human rights</b>	Data Respons' business is heavily dependent on human resources. This entails risk linked to discrimination based on gender, sexual orientation, ethnic origin, religious identity, political affiliation, disability or age.	Data Respons' management works continuously to ensure that all operations follow the company's Code of Conduct. Everyone must show respect for the individual and their privacy and dignity.
<b>Financial risks</b>	Data Respons is exposed to typical financial risks, such as liquidity risks, interest rate risks, currency risks and credit risks.	Data Respons maintains a positive equity ratio and have demonstrated financial solidity for many years. More on financial risk can be found in previous annual reports.

# RISK ANALYSIS

Like all companies, Data Respons is exposed to several risks that could affect the Group's business, earnings and financial position. In response, ongoing risk assessments are performed that identify risks and initiate the actions required to manage them.

Market and operational risks	Description	Action
<p><b>Skills provision</b></p>	<p>Data Respons' business is dependent upon its capacity to attract and recruit skilled employees and upon its employees maintaining their skills, continuing to develop and staying motivated. There is high demand for qualified labour and the company may have difficulty recruiting employees to a sufficient extent. High employee turnover or loss of key people could therefore have negative impact on the company.</p>	<p>Data Respons works continuously with working conditions, company culture, leadership and skills development to ensure that the company is an attractive employer and has the right skills available. Data Respons works with brand building activities and recruitment through, for example, participating in conferences, seminars and courses. The company recruits globally and offers flexible and individualised terms of employment and centrally located offices to attract the right employees.</p>
<p><b>The economy</b></p>	<p>The European IT and consultant services market for digitalisation consultancy services is affected by the general economy. Deterioration of the general business climate could therefore affect demand for the company's services.</p>	<p>The company has developed areas of expertise where market demand is expected to remain strong for decades. In addition, the company further develops skills in new areas on an ongoing basis and monitors national and global market trends. Operations are based on the global megatrends of digitalisation and sustainability, which creates some resilience against economic fluctuations.</p>
<p><b>Client concentration</b></p>	<p>Data Respons' top ten clients account for a large percent of the company's revenue. Data Respons aims to establish long-term client relationships. Several organisations have been Data Respons clients for many years.</p>	<p>Data Respons often has many different, mutually independent projects in progress for its larger clients. The company strives to maintain a good balance among clients from different industries and geographies to mitigate risk exposure. The company includes a strong focus on diversification.</p>



# Appendix: Customer cases

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## Epos Cat: LLV / Logster:

LLV enables the precise control and monitoring of special container suppliers based on fixed (delivery lot) specifications.

This web application can be used to avoid both the unnecessary occupation of storage space due to over-deliveries and production downtimes and additional costs caused by under-deliveries.



## inContext AB: Improving the capabilities of hybrid trucks

inContext assisted a large Nordic truck manufacturer in upgrading its hybrid truck. The upgrade includes integrating new charging capabilities and increasing the truck's range when running on batteries.



## IT Sonix: Six sustainable tech projects from 2020

### IT Sonix: Six sustainable tech projects from 2020

We have an ambition to be directly involved in at least 100 sustainable tech projects every year that makes a difference. Here's six examples from 2020.

[Read more about IT Sonix sustainable tech cases here..](#)

## Epos Cat: Modular environmental balance sheet kit:

The MUB is the instrument for determining and defining the target values for the "Life Cycle Assessment" in the early development phase as part of the property process. With this created baseline, it is possible in the further course of the project to ensure continuous environmental balance sheet project support, including a comparison with competitors if necessary.



## Solutions DK - Advanced textile RFID solution

Advanced RFID solution for managing textile inventory and optimising laundry processes. The solution transforms RFID data into interactive dashboards and reports, providing business intelligence via a comprehensive and real-time overview of scrubs and textile inventory.

The solution is developed for healthcare and workware end users and encourages employees to change clothes more often, improving cleanliness, hygiene, and well-being. Patients benefit from a more hygienic environment, reducing the risk of contamination.



## Solutions AS - Embedded passenger information displays

Design and development of a series of customised outdoor and indoor embedded passenger information displays for Norwegian customer BaneNor. The information displays inform passengers about train arrivals and departures. Form-fit-function ensures integration with existing infrastructure and software. Frame Agreement on hardware throughout the products life cycles.



## Solutions DK - Next generation smart parking application

Next generation car park and yard management application for Danish customer ITS Teknik. The parking System receives and delivers data via an API. Vehicle detection takes place either via coils, video cameras, number plate cameras (ANPR) or single space detection (SSD) in or above the single P stall.

Parking guidance showing free spaces is provided by dynamic P-signposts and are strategically placed in relation to the parking spaces. That way motorists are informed ahead about occupancy status and can plan their route and reach their space in the shortest possible time.



## Solutions DK - Smart seat occupancy solution

Smart seat occupancy solution for Danish customer Attensys.io that benefits train operators, passengers, train maintainers and train service planners. The smart seat captures seat occupancy data, enabling passengers to view and book available seats through the train operators' seat reservation system. The solutions allow operators to maximise train usage and improve seat maintenance. The APP can remind passengers if they have left something behind.



## Data Respons Solutions GmbH - Autonomous Driving Solution

Embedded vehicle computer for traffic systems such as public transportation, railway, trucks, and cars to support autonomous driving.



## Epos Cat: LEGIS / LSD

This application is used to control the management of containers, packs and storage locations in the company's logistics. This optimizes the existing transport capacities, which leads to a reduction in emissions and energy usage.



## Epos Cat: LLV / Logster:

LLV enables the precise control and monitoring of special container suppliers based on fixed (delivery lot) specifications.

This web application can be used to avoid both the unnecessary occupation of storage space due to over-deliveries and production downtimes and additional costs caused by under-deliveries.



## Epos Cat: Online Q&A-System

The annual press conference is held as a hybrid event with this system. This eliminates the need for all journalists to travel from all over the world, which saves considerable resources.



## Epos Cat: Atlassian Tools

Atlassian Tools: For a hospital, we provide the Atlassian tools, which are used to document the processes and make individual steps traceable.



## MicroDoc: Energy Base - Smart Home/Smart Metering Device

EnBW, one of Germany's biggest producer of electrical energy is driving a project which helps the typical homeowner to migrate from mere energy consumption to becoming a "prosumer" (producer-consumer) with local power production and storage by solar panels and stationary batteries.

"EnergyBASE" represents a paradigm shift for EnBW. Rather than just selling power to their customers, EnBW is now offering technology and process know-how for energy management.

Microdoc has enabled the technology through software architecture, test management, and implementation of control and monitoring protocols



## IT Sonix: BAPP

The idea behind BAPP is to digitise and simplify previously analogue processes, especially on construction sites. In particular, the digital documentation of construction progress (construction plans, measures, etc.) is being pushed forward and thus work is being done on the paperless construction site. It is not only the work on site that is being simplified. Other processes are also being centralised and digitalised. For example, it is no longer necessary to maintain papers with signatures, to print out plans for different people to view and edit, or to have all the trades live time-delayed and complicated processes. With BAPP, all these issues are combined, accelerated and simplified.



## Sylog

Sylog consultants are working with software development of the SAFE Platform product. This product is delivered and deployed in several police district in UK making the police constables work more efficient and at the same time creating a safer society for the people living in the area. With its multi-role capability and intuitive workflow-driven user interface, SAFE will be employed extensively throughout the police force for all public contact including 999 and 101 calls, incident management, communications management and resource deployment.

## IT Sonix: World Usability Day

IT Sonix has been organising the World Usability Day for the Leipzig location since 2017. At this one-day conference, professionals, students and anyone interested meet for exciting presentations and workshops on the topics of user experience, human-centred design and the question of how we can make future services and products easier to access and simpler to use. Speakers from a wide range of companies, educational institutions and organisations share their knowledge, provide insights into solutions, learnings and best practices, and illustrate how usability influences our everyday lives. In this way, the world usability day contributes to making our world better and more accessible for everyone.

