

Report on due diligence assessments pursuant to the Transparency Act

The business and its organization

Promon develops and delivers software and cloud-based services for mobile application security. The Group operates internationally, but its business model is primarily based on proprietary technology and its own employees rather than on complex physical manufacturing or raw-material supply chains.

As a result, Promon's supply chain is relatively short. The third parties assessed in 2025 mainly consist of software and professional services providers, advisory and accounting providers, operational suppliers, recruitment and workforce-related service providers, independent consultants, and Employer of Record solutions used in selected markets.

The 2025 assessment covers Promon AS and the Group's subsidiaries, including the entities in the US, UK, Germany, India, Hong Kong and Denmark, consistent with the Group-wide scope applied in the previous reporting period. The assessment covers relevant third-party relationships for the headquarters and the subsidiaries included in the Group's reporting scope.

Governance and anchoring

The work relating to the Transparency Act is anchored in the Board of Directors and management. Internally, the finance function owns and coordinates the process, while the Board reviews and signs the final report.

The Board has appointed the CFO / finance function to oversee and coordinate the implementation of the Transparency Act work. The Board reviews the risk assessment approach and receives updates on material developments, including any red flags or matters requiring escalation.

The work is further anchored in Promon's Code of Conduct, Supplier Code of Conduct, procurement routines, whistleblowing arrangements, and related internal controls. Together, these documents and processes provide the framework for identifying, assessing, and following up potential adverse impacts on human rights and decent working conditions.

Method applied

For 2025, Promon reviewed its third-party list and classified each line as either supplier or business partner based on the nature of the relationship, the type of service provided, and the party's connection to Promon's service delivery and workforce arrangements.

The list was then mapped against a three-level risk model used as the basis for the due diligence assessment:

Level	Overall meaning	Typical examples in Promon's mapping
Risk 1	Highest	Independent consultants or similar supplier relationships where Promon may have a closer influence on contractual content or working arrangements.
Risk 2	Medium	Employer of Record, staffing or workforce-adjacent providers, and selected operational service sectors such as cleaning or catering where labour-rights risk may be elevated.
Risk 3	Lower	Professional services, standard software, and other business partners that support day-to-day operations and are generally considered lower risk in light of sector and country context.

The final 2025 mapping was refined using company name, industry, country context, and the character of the relationship. The resulting classification has been confirmed as the working basis for this report.

The final 2025 mapping covered 275 third parties across the Group. Of these, 19 were classified as suppliers and 256 as business partners. The classification resulted in 15 Risk 1 relationships, 72 Risk 2 relationships, and 188 Risk 3 relationships. These figures should be read together with any ordinary supplier exits, new vendors, and reclassifications made during the reporting period.

2025 mapping category	Count	Comment
Total third parties reviewed	275	Group-wide third-party mapping for the 2025 assessment
Suppliers	19	Third parties connected to Promon's service delivery or workforce arrangements
Business partners	256	Third parties supporting ordinary business operations
Risk 1	15	Highest-priority relationships for due diligence follow-up
Risk 2	72	Medium-priority relationships, including workforce-adjacent and selected operational sectors
Risk 3	188	Lower-risk relationships, including standard professional services and software providers

Overall risk picture in 2025

Based on the final mapping, Promon's overall risk picture remains moderate and manageable. The Group has limited exposure to high-risk upstream manufacturing chains and instead relies predominantly on service-based relationships. This reduces broad structural risk, but it does not remove the need for prioritized follow-up in certain categories.

Compared with the 2024 assessment, the overall risk profile is assessed as broadly stable. The main risk categories remain workforce-adjacent relationships, including

independent consultants and Employer of Record arrangements, together with selected operational service sectors. Any changes from the prior year primarily relate to supplier exits and new suppliers.

- Workforce-adjacent supplier relationships remain the most important area of focus, particularly independent consultants, staffing-related providers, and Employer of Record arrangements.
- Operational sectors such as cleaning and catering continue to merit attention because these sectors can carry elevated labour-rights risk even where the providers are established in regulated markets.
- Standard software, accounting, audit, legal services, and similar professional services are generally assessed as lower risk, while remaining within the scope of Promon's mapping and controls.

Follow-up performed in 2025

In 2025, Promon used questionnaire-based follow-up for selected third parties. The respondents were relevant to the due diligence process because they represented categories that Promon had prioritized for closer review, including workforce-adjacent providers and selected operational service sectors.

The questionnaire-based follow-up was carried out through The Transparency Chain tool. This continued the risk-based approach used in the previous reporting period and focused on obtaining additional information from selected third parties where the nature of the relationship or sector warranted closer review.

Based on management's confirmation, no additional measures, dialogue, or renewed follow-up were considered necessary for the respondents that answered the questionnaire. The responses received were assessed as satisfactory. In addition, some of those respondents have naturally left Promon's supplier portfolio and are therefore no longer part of the current vendor base.

For reporting purposes, this supports the conclusion that Promon carried out risk-based follow-up in 2025, reviewed the outcome of that follow-up, and found no basis for escalation or remediation in relation to the respondents in question.

Findings and assessments

Promon has not identified actual adverse impacts on fundamental human rights or decent working conditions that the company has caused or contributed to in 2025 based on the assessments performed and the information available at the reporting date.

During the previous reporting period, Promon noted that it was monitoring a matter involving allegations against one supplier. Based on the follow-up performed and the information available at the reporting date, Promon has not identified circumstances indicating actual adverse impacts on fundamental human rights or decent working conditions linked to Promon's operations or supply chain. No further action was therefore considered necessary in relation to this matter.

The 2025 due diligence work has nevertheless identified categories where inherent risk is higher and where continued attention is warranted. This applies in particular to supplier relationships that are close to employment conditions or workforce deployment,

and to certain service sectors where labour-rights risks are generally recognized as higher than for ordinary professional services.

The fact that no further action was required following the questionnaire responses does not remove these categories from Promon's risk map. Instead, it indicates that the controls and review process carried out in 2025 did not reveal circumstances requiring further intervention at the reporting date.

Measures to prevent and mitigate adverse impacts

Promon's work to prevent and mitigate potential adverse impacts in 2025 is based on ongoing governance and risk-based controls rather than case-specific remediation. The following measures form the core of the Group's approach:

- maintaining and applying the requirements set out in the Supplier Code of Conduct and relevant contractual frameworks
- classifying third parties as suppliers or business partners and applying a risk-based review model
- prioritizing workforce-adjacent suppliers and exposed service sectors for closer assessment where relevant
- using questionnaires and documentation requests as a proportionate follow-up measure for selected third parties
- perform periodic review of new and changed third-party relationships and escalating any red flags through management and, where needed, to the Board

Because the 2025 questionnaire responses were satisfactory, and because no actual adverse impacts were identified, no targeted remediation measures, contract interventions, or enhanced dialogue processes were initiated in relation to those respondents during the reporting period.

Whistleblowing and grievance mechanisms

Promon maintains a whistleblowing channel for internal and external parties. This channel forms part of the Group's broader framework for identifying and handling possible misconduct, including issues linked to human rights, decent working conditions, and ethical business conduct. Any reports are to be handled in line with internal procedures and escalated as appropriate.

Conclusion

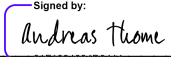
In 2025, Promon Group continued its due diligence work under the Norwegian Transparency Act by mapping and assessing relevant third parties across the Group, refining the distinction between suppliers and business partners, and applying a risk-based classification model.

The final 2025 mapping confirms that Promon's main risk exposure is linked to selected workforce-adjacent supplier relationships and certain operational service sectors rather than to complex physical supply chains. Questionnaire-based follow-up of selected respondents did not reveal issues requiring further measures, dialogue, or renewed follow-up, and some of the respondents are no longer part of the supplier portfolio.

Compared with the previous reporting period, the 2025 due diligence process reflects a more refined supplier and business partner mapping and clearer follow-up of selected third parties. The overall risk exposure remains concentrated in the same main categories as before, but the questionnaire responses and supplier portfolio changes did not reveal any need for additional measures, enhanced dialogue, remediation, or escalation at the reporting date.

At the reporting date, Promon has not identified actual adverse impacts that it has caused or contributed to. The Group will nevertheless continue to monitor and review the identified risk categories as part of its ordinary due diligence process.

Board signatures

Signed by:

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Andreas Thome
Chairman

Signed by:

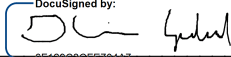
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