

PG Transparency Act Statement

This report is published pursuant to Section 5 (§ 5) of the Norwegian Transparency Act (2021) and was approved by Position Green's Board of Directors on 21 June 2023 and covers the period 1 July 2022 until 31 December 2022.

Our structure, operations and human rights management systems

Founded in 2015, Position Green is a pure-play sustainability partner operating out of Oslo, Stockholm, Copenhagen, Malmö, Gothenburg, New York, Houston, Austin and London. With a unique offering that combines cutting-edge ESG software with specialised advisory services, e-learning and independent assurance, Position Green's full-cycle solutions fuel the journey of competitive businesses – from compliance to sustainable impact. A versatile ESG product suite and data-driven insights enable enterprises and investors to cut through complexity and become more seamless, transparent and action-oriented.

We employ over 200 people across our offices, with approximately 30 located in our Norwegian office.

Position Green is committed to the continued practice of human rights due diligence across our operations and business relationships. We remain committed to the corporate responsibility to respect human rights as outlined in the UN Guiding Principles for Business and Human Rights. We respect internationally recognised human rights as defined by the International Bill of Human Rights and the International Labour Organisation's Fundamental Conventions, as well as other relevant human rights treaties. Our human rights commitments are outlined in our human rights policy, last updated in 2023. This policy outlines our commitment to all the steps of human rights due diligence, including identifying risks, preventing and mitigating risks, and providing appropriate remedies. We work to be a leading example of best practices within business and human rights.

Position Green has worked to establish a human rights culture across the organisation since the merger in early 2022. Notable steps taken include:

- Designing and distributing human rights training across the organisation's digital Academy platform
- Drafting a Group-wide human rights policy
- Conducting a human rights saliency risk assessment
- Establishing a senior-level Position Green ethics committee to review clients against Position Green's Ethical Guidelines for Selecting Customers
- Ensuring human rights clauses in Position Green contracts
- Creating a Group-wide and externally available [whistleblowing mechanism](#)

Position Green's human rights due diligence

In 2022, Position Green has undertaken a saliency assessment to identify its most salient human rights risks pertaining to our industry. This assessment was produced using the OECD Guidelines for Multinational Enterprises' severity-likelihood framework. While the assessment did not identify any actual rights impacts, it identified four areas where we focus our current and future human rights due diligence efforts including:

- **Working with clients who have historically poor human rights performance**

Position Green is committed to working with clients at all stages of their sustainability journeys. Because of this, there is a risk of working closely with companies that may have had negative human rights impacts in the past and continuing negative human rights impacts but are working in good faith towards improving their practices and reducing their negative human rights impact. We recognise that there is a fine line between helping companies improve and approving unfavourable practices. We will remain vigilant in utilising our leverage and influence with companies to lead to positive improvements in human rights and actively work against contributing to greenwashing, 'rights-washing' or otherwise contributing to negative impacts on human rights via our client relationships.

To mitigate this impact, the Position Green ethics committee is explicitly tasked with reviewing high-risk potential clients against our Ethical Guidelines for Selecting Customers, which are modelled after the Norges Bank Investment

Management Guidelines. We do not work with companies where there is an unacceptable risk that the company contributes to or is responsible for serious or systemic human rights violations.

The ethics committee shares its decisions once a quarter to further establish and build human rights understanding throughout the company so that all client-facing employees remain aware of the need to consider human rights in potential business relationships.

In the upcoming year, we seek to design and distribute an internal ethics course to further increase employee understanding regarding ethical business practices and our own ethics policies.

- **Ensuring data protection and privacy rights**

As an ESG technology solutions provider, we inherently deal with significant amounts of data which can include personal or otherwise sensitive data. Position Green remains committed to ensuring the protection of this data and adheres to all relevant laws and regulations related to data handling including the GDPR.

In the upcoming year, we seek to achieve a SOC2 Certification and maintain zero data breaches and zero legal proceedings related to user privacy as was the case in 2022.

- **Promoting a safe and healthy workplace**

Position Green is committed to ensuring its employees work in a safe environment absent from any form of harassment, discrimination or abuse. Healthy work-life balance is promoted, and practices such as excessive overtime are not promoted. Furthermore, we seek to establish a culture of healthy teamwork and working relationships.

Among other workplace wellness initiatives, Position Green promotes whole-person health through benefits packages that include gym allowances and access to digital mental health and wellness platforms. In the upcoming year, we plan to review existing policies and produce a Group-wide code of conduct with updated references on measures pertaining to topics including but not limited to non-discrimination, employee wellness and drug and alcohol policies. Additionally, we seek to establish a health and well-being target in 2023.

- **Building a diverse and inclusive workplace**

Our people are at the centre of our business. We value what each member of our team brings to work and actively are committed to supporting and growing a diverse and inclusive workforce. Position Green is committed to non-discrimination and will not tolerate discrimination based on gender, race, age, religion, disability, nationality, ethnic origin, sexual orientation or any other protected status.

In 2022, Position Green rolled out its first employee satisfaction survey and diversity study. Additionally, we hired a Head of People and Culture tasked with building an inclusive and safe workplace. Position Green maintains an employee right of refusal allowing employees to abstain from working on projects that may go against their personal moral, ethical, or religious code of beliefs. Management accepts such refusals without any form of repercussions. In the upcoming reporting period, Position Green seeks to develop a Group-wise diversity, equity and inclusion policy.

Next steps

Position Green did not identify any specific human rights violations in the previous reporting period. We remain committed to best practices within our human rights work and will continue to improve our policies and procedures to continue to mitigate potential human rights impacts that may occur within our own operations and business relationships. If any such impacts are identified, we are committed to transparency communicating the impacts, seeking appropriate remedies, and updating our policies and procedures respectively.

Requests for information

More information about Position Green's sustainability work can be found in our [ESG Report 2022](#).

Requests for information regarding this Transparency Act statement or Position Green's human rights due diligence policies and practices at large can be made to Tariq Desai – Position Green Human Rights Lead: tariq.desai@positiongreen.com.

June 2023



Chairman of the Board in Position Green Group Investco AS, Henning Vold

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