



PG Transparency Act Statement

This statement is published by Position Green AS in accordance with Section 5 (§5) of the Norwegian Transparency Act (2021). It reflects the company's efforts and improvements in 2025 to respect fundamental human rights, ensure decent working conditions, and key actions taken to identify and address potential risks across its operations and value chain.

As a provider of ESG software and advisory services with operations across Europe and clients across the world, Position Green collaborates closely with clients, suppliers, and partners across multiple sectors. In doing so, we seek to influence and support improved human rights performance not only within our own operations but throughout our broader network. This statement was approved by the Board of Directors of Position Green in June 2026 and covers the reporting period from 1 January 2025 to 31 December 2025.

A. About Position Green

Founded in 2015, Position Green is a pure-play sustainability partner with operations in Oslo, Malmö, Stockholm, Gothenburg, Copenhagen, London, Berlin, Brussels, Amsterdam and Helsinki. As of 31 December 2025, we employed 309 across our offices, with 61 based in Norway.

Our unique offering combines advanced ESG software with specialised advisory services and e-learning, forming a full-cycle solution that supports businesses throughout their sustainability journey, from compliance to measurable impact. Our versatile ESG product suite and data-driven insights enable enterprises and investors to cut through complexity and become more seamless, transparent, and action-oriented in their sustainability efforts.

Our value chain spans high-quality data sourcing, software development, and advisory delivery, supported by data centres, suppliers, and office operations across multiple countries. We actively engage with our partners and providers to promote sustainability, transparency, and responsible practices throughout the value chain.

In 2025, Position Green strengthened its customer offering through the acquisitions of Greenomy, Morescope and Factlines, expanding capabilities in regulatory reporting, carbon management, mid-cap SaaS solutions and supply chain management.

B. Governance Structure

Position Green is committed to the continued practice of human rights due diligence across our operations and business relationships. We adhere to the corporate responsibility to respect human rights, as set out in the UN Guiding Principles on Business and Human Rights. We also align our approach with internationally recognised human rights instruments, including the International Bill of Human Rights and the International Labour Organisation's Fundamental Conventions.

Our human rights commitments are outlined in our Group-wide Human Rights Policy, last updated in 2023. The policy affirms our responsibility to identify, prevent, mitigate and remedy potential and actual human rights impacts. It reflects our ambition to serve as a leading example of best practices within business and human rights. Since our 2022 merger, Position Green has worked actively to embed a human rights culture throughout the organisation.

Key steps taken include:

- Designing and distributing human rights training and ethics training programme through our digital Academy platform
- Drafting and publishing a Group-wide Human Rights Policy
- Drafted and released our Code of Conduct
- Conducting a human rights saliency risk assessment
- Establishing a senior-level Ethics Committee to review customers in line with our Ethical Guidelines for Selecting Customers
- Embedding an ethics clause in our customer contracts
- Launching a Group-wide, externally managed and publicly accessible whistleblowing mechanism
- Utilised Factlines platform to gather supplier self-assessments and identifying potential risk areas, especially focused on suppliers with largest spend.



Internal training completion as of 30 June 2026.

Business Ethics & Position Green's Ethical Guidelines	88.7%
Code of Conduct at Position Green	81%
Data and IT security at Position Green	75.5%

**These numbers include employees from acquired companies, who were still at Position Green on 31st of December 2025. Not all of these employees have had formal deadlines to complete the trainings yet. We will work on increasing this completion across the coming year.*

Our Governance Framework

To guide our work on human rights and responsible business conduct, Position Green has established the following policies and governance mechanisms:

- **Human Rights Policy:** This policy sets out our overall human rights commitments, including how we apply due diligence across our operations and value chain. It outlines expectations for all employees, suppliers, and partners, with a focus on four key areas: working with high-risk clients, data protection, workplace safety, and diversity and inclusion.
- **Whistleblowing Mechanism:** Position Green maintains an externally managed and anonymous whistleblowing platform accessible via our website. This channel enables employees and stakeholders to report concerns related to human rights, data privacy, cybersecurity, or other breaches of our policies. Reports are reviewed by the internal Ethics Committee and followed up confidentially.
- **Ethical Guidelines for Selecting Customers:** These guidelines reference those set by Norges Bank Investment Management and outline Position Green's criteria for working with clients and partners. We avoid relationships with companies involved in serious human rights violations, environmental damage, corruption, or other unethical conduct. The Ethics Committee may consider working with companies in breach of these guidelines only where there is a demonstrable commitment to improvement.
- **Code of Conduct:** Our Code of Conduct defines the standards of ethical behaviour expected of all employees. It covers business integrity, transparency, anti-corruption, data privacy, and respect for human rights. The Code is mandatory training for all employees and is available via our internal platform.
- **Equal Opportunity Policy:** This policy ensures fair treatment and non-discrimination across all hiring, promotion, and development processes. It applies across all offices and reinforces our commitment to inclusion regardless of gender, ethnicity, age, disability, or background.
- **Workplace Safety Policy:** This policy outlines procedures and responsibilities for ensuring physical and psychological safety in the workplace. It includes emergency protocols and standards for incident reporting and is implemented locally by our regional Managing Directors.
- **Work Environment Policy:** This policy is focused on promoting well-being and sustainable working conditions, this policy covers leadership behaviour, mental health, work-life balance, and respectful workplace interactions. It is regularly evaluated through employee engagement surveys and feedback channels.
- **Information Security Policy:** Processes and guidelines to ensure confidentiality, availability, integrity of information and information assets covering all information, regardless of whether it is processed manually or automated. The policy aligns with the General Data Protection Regulation (GDPR) and outlines overall principles to uphold information security, along with procedures covering various issues within the topic, like encryption management, security incident management, and management of information assets.
- **Internal AI Policy:** Establishes processes and guidelines on the responsible use of AI in Position Green. The policy outlines the governance, principles, and practices surrounding both the use of AI within our platform and internal use by Position Green employees and partners.

Cumulatively, these policies form a holistic framework for managing our human rights risks, promoting decent working conditions, and supporting continuous improvement.

C. Our human rights due diligence approach

In 2022, Position Green conducted a saliency assessment to identify our industry's most significant human rights risks. This assessment was carried out using the OECD Guidelines for Multinational Enterprises, and a severity-likelihood framework was applied to evaluate potential areas of concern.

While the assessment did not identify any actual human rights violations, it highlighted four key areas where we will focus our ongoing and future due diligence efforts. These are the areas where Position Green is most likely to



be directly linked to or indirectly contribute to potential human rights impacts. Each area was also identified and further examined through a Double Materiality Assessment (DMA) conducted in 2024, and updated in 2025, which provided additional insight into how these risks may occur across our operations.

For each issue identified, we have outlined how we currently address or plan to address the risk and the expected outcome of our efforts. This approach ensures that our due diligence processes are properly managed, actionable, and risk based. The four areas include:

1. 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 caused or contributed to human rights violations in the past or continue to have adverse impacts despite efforts to improve. We recognise the importance of distinguishing between meaningful engagement and inadvertently enabling harmful practices.

To mitigate this risk, our Ethics Committee reviews high-risk clients against Position Green's Ethical Guidelines for Selecting Customers, which references with the Norges Bank Investment Management (NBIM) exclusion framework. We do not engage with companies with an unacceptable risk of systemic or serious human rights violations.

The Ethics Committee meets quarterly to discuss decisions and build an internal understanding of ethical considerations across the company. In 2023, we launched an internal ethics course to further raise employees' awareness of our human rights expectations and policies. NBIM's framework has proven effective as a reference point, providing a clear, widely recognised standard that supports consistency, credibility, and accountability in our client evaluation process. In 2025, we adopted Factlines software to enhance our supplier due diligence. We issued a risk self-assessment questionnaire, aligned with the Norwegian Transparency Act, to our 18 highest-spend suppliers to map potential risk areas. This process flagged one medium-risk supplier, which was successfully resolved through clarifying comments from the vendor.

Through this structured approach, we ensure that Position Green engages with clients who are serious about improving their sustainability performance while avoiding relationships that may compromise our ethical standards. We will continue to use our leverage to influence clients in the right direction and avoid contributing to greenwashing or rights-washing. In the years ahead, we aim to achieve full completion of our internal ethics course, ensuring all client-facing staff are equipped with a strong understanding of our ethical standards and human rights commitments. This includes extra focus on ensuring all employees who have arrived at Position Green through acquisitions also complete the ethics course.

2. Ensuring data protection and privacy rights

As a technology solutions provider, Position Green manages large volumes of data, including personal and sensitive information belonging to clients and employees. We recognise that any breach involving confidential business information (CBI) or personally identifiable information (PII) could lead to the violation of individual rights and undermine stakeholder trust.

We are committed to safeguarding data in line with all relevant laws and standards, including the General Data Protection Regulation (GDPR). Our compliance framework includes SOC2 certification (Type 2) and adherence to internationally recognised standards such as ISO 27001 and OWASP. Our internal practices incorporate data ethics principles, and both advisory and software teams are subject to strict privacy protocols.

In 2025, Position Green recorded zero data breaches or legal proceedings related to user privacy. We aim to maintain this standard year-on-year, ensuring client and employee data is managed with the highest integrity and security.

3. Promoting a safe and healthy workplace

Position Green operates in an industry that is fast-paced and has experienced rapid growth in the past, but is now facing more challenging market conditions in the short-term due to the EU's revision of mandatory sustainability rules, which has reduced Position Green's addressable market very significantly over the past year. Since the EU's announcements of the changes, we have had to do both layoffs and restructuring, which presents risks for the employees left in the company related to employee stress, burnout, and extended sick leave. While not all was related to work, 3.7% of our workforce experienced prolonged sick leave in 2025. Our engagement survey flagged industry turbulence and job security as key concerns, followed by workload. We work to minimize the impact of these short-term market instability by continuing to invest in the everyday employee experience and training, for example a group-wide self-leadership and resilience training planned for and now carried out in 2026.



Position Green promotes a healthy work environment through preventive measures and workplace wellness initiatives. These include gym allowances, health insurance, and access to mental health platforms. We do not promote excessive overtime and encourage open conversations around workload management. We updated our policies and developed a comprehensive Group-wide Code of Conduct that explicitly addresses non-discrimination, employee wellness, and substance use policies. In 2025, we introduced more frequent employee engagement surveys to ensure close feedback loops during the market adjustment our industry has been going through. .

Our targeted initiatives aim to reduce work-related stress and promote a healthy, sustainable work culture. In 2025, we did not reach our turnover target of 80% employee retention, with an actual turnover rate of 50.2%. This high turnover is a result of the layoffs and restructuring given the challenging market conditions. For many of the same reasons, our employee Net Promoter Score (eNPS) remains significantly below target, currently at -30 against our goal of 40.

These initiatives, supported by ongoing monitoring through engagement surveys and leadership reviews, will be central to improving this score in the next reporting period. Reaching our health and well-being target will demonstrate measurable progress in creating a safe, supportive, and engaging workplace for all employees.

4. Building a diverse and inclusive workplace

We believe that a diverse and inclusive workforce is essential to innovation and long-term success. We do not tolerate discrimination based on gender, ethnicity, age, disability, sexual orientation, religion, or any other protected characteristic. We recognise that improving diversity and inclusion requires continuous effort, especially as we scale.

In 2022, we introduced our first employee satisfaction survey and diversity study to gain insight into our workforce's lived experiences. We launched a DEI training course and appointed a Head of People and Culture to lead our inclusion strategy. Employees are empowered to abstain from working on projects that conflict with their ethical or religious beliefs without fear of retaliation. In 2023, we developed and implemented our Equal Employment Opportunity Policy, which reinforces fair and unbiased practices in hiring, promotion, and compensation. We further demonstrated commitment to our DEI principles by maintaining our gender diversity target at 45/55 in 2025.

Through these measures, Position Green aims to cultivate a workplace where all employees feel seen, heard, and valued. Our DEI efforts are designed to improve representation across leadership levels, close pay gaps, and ensure equal access to career development. We will continue to assess progress through surveys, feedback, and data tracking.

D. Next Steps

Position Green did not identify any specific negative human rights impacts in the previous reporting period. We remain committed to best practices within our human rights work and will continue to strengthen our policies, procedures, and governance mechanisms to mitigate potential risks across our operations and business relationships.

As part of our ongoing efforts, we will deepen our focus on supply chain transparency. In the upcoming period, we plan to allocate time and resources expand the work we have been doing on supplier assessments and screening to be more robust and cover more of our suppliers in a reliable way. We are also planning to further improve practices to ensure our expectations around ethical conduct, non-discrimination, and decent working conditions are clearly communicated and upheld.

Should any adverse impacts be identified, we are committed to addressing them transparently, seeking appropriate remedies, and updating our internal processes accordingly. Our goal remains to build a responsible, ethical, and resilient organisation that contributes to positive human rights outcomes both within and beyond our operations.

E. Request for Information

More information about Position Green's sustainability work can be found in our [Sustainability Report 2025](#).

Requests for information regarding this Transparency Act statement or Position Green's human rights due diligence policies and practices can be made to **Robin Orset Kålås**, Position Green's Sustainability Manager, at robin.kalas@positiongreen.com.



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