

[Defendable

Account of Defendable's
Due Diligence 2025

About Defendable

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Defendable is a Norwegian cybersecurity company. We deliver a range of security-related services: security monitoring, advisory services, incident response, and security testing. We aim to be an end-to-end security partner for our customers, while also providing single-standing advisory and security testing services.

Our company is owned by our employees and other investors. Most of our customers are Norwegian, and they consist of both large corporations as well as smaller businesses, from the private and public sector alike. While our main office is in Oslo, we also have offices in Fredrikstad, Gjøvik and Grimstad.

Defendable does not operate in regions with low protections of human and worker rights, and our services are not typical high-risk services.¹

Nevertheless, there are still aspects of Defendable's business which involve both direct and indirect risk regarding sustainability and human rights, including:

- As an IT organization, Defendable is dependent on consuming a wide variety of IT services, ranging from hardware and IT equipment to software, applications, and

solutions. We are thus consumers of products that are categorized as high-risk.

- Some of our services necessitate travel activity and energy usage. Our Managed Detection and Response (MDR) service depends on a range of third-party cloud-based software and data storage services. Defendable's Advisory and Incident Response services also require travel, where cars, train, airplane, and bus are the most commonly used forms of transportation.
- Additionally, both consultancy and incident response services are generally associated with an elevated risk for periodically high use of overtime.
- Our physical offices require maintenance, cleaning, and a steady supply of various products and items, including office supplies, coffee, and food. Some of the facility's items and maintenance activities (such as cleaning and office supplies) are considered services with associated risks.
- We promote our business in several ways, including by procuring merchandise and items for use in marketing. This does include purchasing products and materials that are categorized as high-risk.

¹ Based on, inter alia, information from the high-risk list maintained by www.anskaffelser.no



How We Organize Our Efforts for Sustainability and Corporate Social Responsibility

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Defendable believes we can make a difference

Throughout the year, Defendable continuously works to improve our overall sustainability and work environment practices. As a cybersecurity company, Defendable relies on a variety of different suppliers and providers. By doing due diligence assessments on a regular basis, we believe we can detect areas where there is risk of negative impact and use our findings to make proportional efforts to prevent and mitigate unsustainable practices and violations of worker- and other human rights.

Defendable's goals and commitments

Environmental goals

Defendable is committed to implementing an effective environmental management system. This means that we pledge to continuously reduce our overall environmental impact. We do so by establishing and adhering to internal requirements within the organization, particularly related to waste, energy use, and procurement.

We will ...

- Make environmental considerations a natural and integrated part of our operations.
- Comply with environmental regulations and requirements set by the public authorities.
- Identify and mitigate potential sources of pollution.
- Strive for efficient energy use and minimize the consumption of materials.





Health, Safety, and Environment (HSE) goals

Our HSE goal is to ensure – through compliance with laws and regulations – that no serious accidents occur within our organization. Our employees will experience a safe physical, psychosocial, and organizational working environment that is equal to or better than that of other companies in our industry.

We will ...

- Create a safe and secure working environment for all employees.
- Sort our waste.
- Reduce our energy consumption.
- Decrease the use of paper.
- Strive to work with suppliers that hold recognized environmental certifications.
- Increase the number of environmentally certified products we use.

Roles and routines to promote sustainable practices in Defendable

According to Defendable policy, the responsibility that Defendable operates in compliance with the Transparency Act (öpenhetsloven) lies with the Board of Directors. The Board of Directors has delegated daily responsibility for the matter to our Chief Executive Officer. The CEO ensures that Defendable, in its daily activities, adheres to its responsibilities. This includes staying oriented on Defendable's transparency efforts and ongoing work, approving policy and routines, and considering and prioritizing risks.

The Compliance Department and the Eco-Lighthouse Environmental Coordinator orients the CEO and the Board of Directors about relevant matters – such as identified risks, measures and recommendations for improvements in documentation – in the form of annual reports, as well as ongoing reporting and communication as needed. The dedicated resources carry out adjustments in the documentation as needed.

Some key documentation concerning Defendable's sustainability and work environment efforts include:

- Ethical guidelines: Expresses Defendable's expectations for our workplace and our employees' working environment.
- Procurement of IT and non-IT products: Policies, routines and guides for procurement processes, which include considerations of human rights and sustainability.
- Personnel handbook: A digital handbook for practical and easy access to rules, rights, etc.
- Whistleblowing guide: Information on how to use either the digital form or the letterbox for anonymous whistleblowing, as well as information about the process and how the Health and Safety Representative can aid and support the employee.

Since last year, we have also improved our routines and systems for nonconformity reporting and made it easier for employees to recommend improvements by streamlining both processes.

Defendable's Climate Account

03

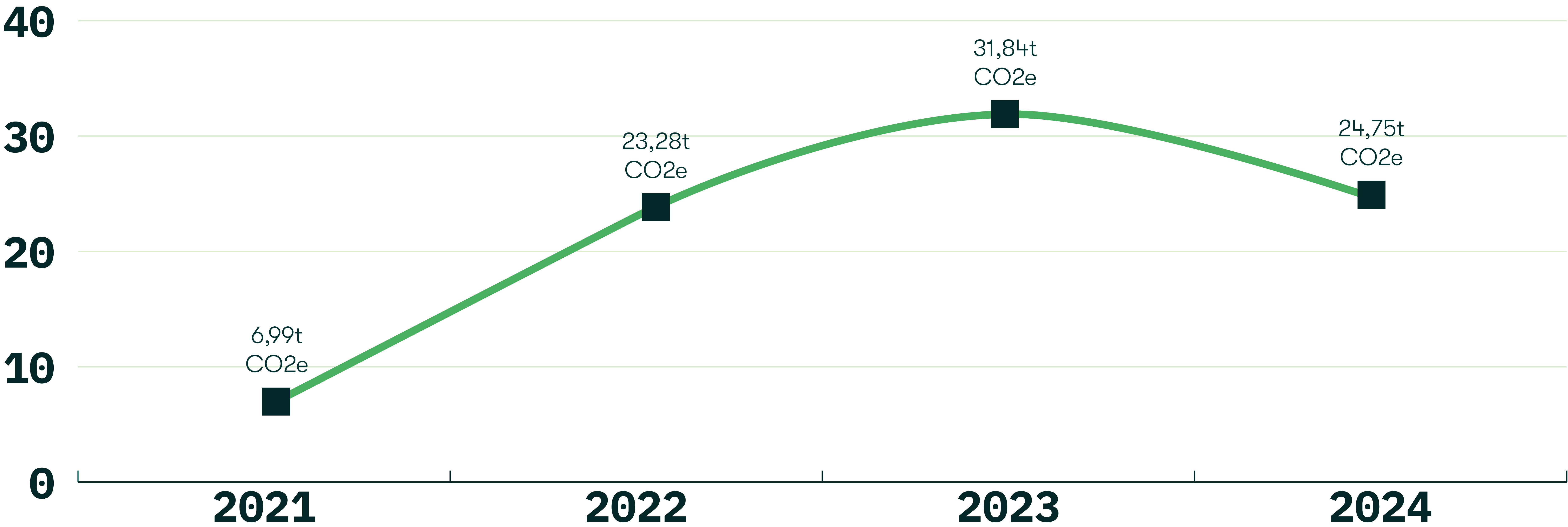
When Defendable achieved an Eco-Lighthouse (Stiftelsen Miljøfyrtårn) certification in 2022, we began reporting on our emissions, sustainability practices, and other data to help us track our climate account.

Since we began reporting on this data, Defendable’s overall emissions have increased. This is assumed to be a combination of a lack of complete data for the first year (2021) and Defendable’s general growth as a company.

The figure below shows Defendable’s overall emissions between 2021 and 2024:

Klimagassutslipp fra scope 1, 2 og 3

↓ -22% fra 2024





This climate account includes data about:

- Energy use (heating, air conditioning, power usage etc. in office facilities)
- Travel activities and means of transport, incl. emissions relating to flights
- Waste and recycling

Not included in this figure is energy usage from computers, network devices, and printers not associated with the Oslo offices, as well as mobile devices and some of the largest software products. Energy usage from these entities is tracked in a separate energy tracking tool. These statistics are not displayed here, as Defendable estimates the overview to be incomplete due to some systems and devices not being enrolled. Defendable is currently working to incorporate the remaining devices and systems that require energy in Defendable, in the hope that we will be able to gain a more accurate and complete overview of our total energy usage over time.

Some of our other commitments to reducing climate impact include:

- Minimizing energy use in our operations and using energy efficient equipment and solutions.
- Prioritizing suppliers that use renewable energy and operate highly efficient data centers.
- Actively promoting recycling and reuse of hardware and materials.
- Reducing emissions from transportation and encouraging remote work solutions.
- Monitoring and reducing our greenhouse gas emissions annually.

How Defendable Organizes and Carries Out Due Diligence Assessments

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The work following last year's early implementation of the Transparency Act has been largely connected to examining and following up Defendable's supply chain, as well as to follow up internal risks identified and presented in last year's due diligence report. Additionally, we have worked to incorporate our yearly reporting of Defendable's sustainability and efforts to reduce our emissions and climate footprint into this due diligence assessment and its associated report.

As with last year, the work with seeing through this due diligence assessment was formally placed with our Compliance Department. When carrying out these assessments, we make sure to include relevant stakeholders and resources as needed. Workshops (including those relating to Defendable's sustainability reports) were held with various resources from across the organization.

Firstly, we turned inward in our organization, considering relevant policies, routines, and other sources to map risk internally in Defendable. Through both formal and informal inquiries, we gathered information regarding sustainability and worker rights.

Secondly, we gathered relevant data and reports relating to those risk areas. This included our sustainability report, our climate account, and nonconformity reports.

Thirdly, we followed up on selected suppliers based on last year's risk screening. This risk screening was based on several factors, including the level of risk associated with product and service type, and size of purchase. We used industry-customized self-evaluation forms for the follow-up itself.

Finally, we considered the measures we had identified from last year and their progress and identified new measures to address the remaining or new risks uncovered in this year's due diligence assessment.



Status on Last Year's Identified Risks and Their Measures

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The following chapter provides information on how Defendable has followed up the risks and negative impacts identified in last year's due diligence assessment.

Reporting and managing nonconformity

Last year, we reported that there seemed to be a slight mismatch between report-worthy incidents known to department leaders and incidents actually reported in the system as nonconformity. Defendable therefore suspected that there were challenges with how our nonconformity reporting mechanism worked, both in relation to routines and guidelines in how to report nonconformity, as well as bottleneck issues relating to the handling of nonconformity.

Defendable assessed that our ability to deal with nonconformity in an efficient and prioritized manner could be hampered because of these issues, and we identified several measures to address this. All measures were assigned to a specific person or group of people, to ensure that the identified risks were addressed and handled.

As a result of these measures, Defendable assesses that we have managed to lower the threshold for reporting nonconformities by simplifying the reporting form for all nonconformity types. The most significant change is on the handling side, where we have made improvements to how nonconformities are handled, and risks are assessed. Additionally, we now have the capability to extract statistics from all reported and handled cases. We have also clarified ownership of nonconformities, both for those responsible for handling them and for the risk-owners. Training for nonconformity handlers is currently being conducted.

As with last year, we experience that the nonconformity system is used actively. Users generally understand the different categories and how to describe nonconformity and other incidents in line with routine.

Going forward, Defendable will:

- Pay close attention to the effects the changes to our nonconformity reporting system and routines have had.
- Ensure that all new and existing nonconformity handlers receive necessary training in the new routines.





Clarifications in Defendables guidelines and rules for overtime

Excessive use of overtime is a common risk for providers of consultancy services. In Defendable, it is especially the Incident Response service where this risk is presumed to be highest. Acknowledging this risk, Defendable always communicate to employees on a regular basis that their health and wellbeing come first. Personnel leaders undergo training to ensure they can communicate well with employees and follow-up on their needs. Naturally, employees are compensated for long working hours in the form of time off in lieu and/or overtime pay.

In last year's report, Defendable reported how the intensive nature of a previous customer incident resulted in temporary sick leave for one employee. After implementing several measures, Defendable has not experienced a re-occurrence or similar episodes. Last year's reported overtime usage was noticeably low, including when compared to aggregated statistics from other actors in our industry. Defendable will nevertheless continue with our efforts to prevent excessive overtime.

We have also made some adjustments to our overtime rules to ensure that the use of overtime remains transparent for all managers.

Reduction in the use of leading- and particularly independent positions (“særlig uafhængig stilling”)

“Særlig uafhængig stilling” is a position reserved for persons in the organization with leading- or particularly independent positions, whose work is characterized by an especially high degree of independence and flexibility. Last year, Defendable highlighted that incorrect use of this position type is a known challenge in the consultancy industry.

Therefore, Defendable decided to make an extra effort to ensure that leading- and particularly independent positions are only used appropriately according to the law. At the time of the due diligence assessment last year, Defendable had instated a rule that all new employees were to have an ordinary employment position (“ordinærstilling”). We also revised the contracts with employees in leading- or particularly independent positions to examine whether this position type was suitable and necessary for that employee’s tasks and responsibilities.

By so doing, Defendable achieved the following:

- All new employments in 2024, not characterized by a high level of independence and responsibility, were ordinary positions.
- Some employees have had their position amended from “særlig uafhængig stilling” to ordinary position, in agreement with Defendable.

This shift has been received positively by the organization and the affected employees.



Identified Risks and Negative Impact

The following chapter provides information on risks and actual negative impacts which Defendable has uncovered in the due diligence assessment that was carried out in 2025. Unless otherwise specified, the risks and negative impacts occurred in 2024.

Sustainability

Energy usage

As with many organizations that utilize cloud-based services, there is a general risk that the 'true' energy usage of the organization becomes invisible when a large part of the energy usage occurs indirectly, via a third-party. As mentioned in Defendable's Climate Account, Defendable is currently not tracking all our energy usage, as there are devices and systems that are not enrolled in our energy usage tracking tools. This could leave our statistics inaccurate, and thus also affect how we prioritize our efforts and which measures we implement.

To address the risks associated with energy usage, Defendable is doing the following:

- Working to incorporate remaining devices and systems that require energy in Defendable into our energy tracking tool.
- In addition to the regular reminders for deleting excess data in the organization, we are also working on a larger project to make deletion simpler and more effective. This will save energy by requiring less storage space with Defendable's data service suppliers.
- Energy use and other environmental impacts of new technologies are continuously assessed as part of the standard procurement risk assessment.





Office upgrades and workspace changes

While Defendable has not identified any specific risks of note relating to our office facilities, we have nevertheless implemented a few measures to enhance the overall sustainability and energy efficiency of our offices.

We have made further clarifications in our guidelines and visible guidance on waste assortment, to ensure a higher degree of recyclability.

Defendable's office facilities are currently undergoing several updates that contribute to an estimated 34% energy usage reduction.

- New windows and solar shading
- Quantity-regulated heating and cooling systems
- New building management system (BMS) for improved control and tuning of technical systems (with our landlord)
- Demand-controlled ventilation in all renovated areas
- Climate-controlled roof vents in the atrium with associated recirculation units
- New, smaller heat pump to meet cooling needs in winter, allowing reduced operation of the primary heat pumps

Other risks relating to work environment

Beyond the risks already mentioned – including overtime – Defendable has also identified the risk of long-term consequences from extended periods of physical inactivity. Sitting still for a prolonged amount of time can cause both physical and mental drawbacks for employees.

To address this risk and achieve the benefits associated with physical activity in the workplace, Defendable is now offering all full-time employees 1 hour paid workout time a week.

Going forward, the following measures will be implemented:

- Regularly encourage and remind employees to use the workout time, in various forums.
- Continue to provide ergonomic equipment in the office.

Nonconformity

A total of 182 incidents reported in our nonconformity system between January and December 2024 were assessed. While this is an increase in the number of incidents reported from last year, last year's assessment also counted the nonconformity reported from January to March 2024.

Of these 182 incidents, none were reported in any of our established HSE categories. However, through a manual verification process, some HSE-related nonconformities were detected. This was anticipated, as Defendable has made changes to our nonconformity reporting and handling processes and routines (as described in the chapter above).

All the reviewed HSE nonconformities – of which there were less than a dozen – were assessed to entail either low risk or had minor consequences for employees. Suitable measures were implemented quickly and had the desired effect.



Defendable's Assessment of Risk in our Supply Chain

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Background

Last year, Defendable categorized our suppliers according to service- and product type, and location. This was done to get a better overview of the types of purchases Defendable makes and their associated risks. IT products – both hardware and software – were a clear number one.

This year, we used these metrics to identify which suppliers we wanted to follow up with. The risk screening was conducted based on criteria such as country risk, product risk, and industry risk, in accordance with the OECD Guidelines for Due Diligence for Responsible Business Conduct. Additionally, purchase volume and whether any previous negative impacts have been identified are also considered part of the assessment.

Methodology

We developed self-evaluation forms tailored to different sectors and product types, including Facility Services, Food and Beverages, IT Hardware and Software, and Clothes and Office Supplies. To incentivize responses from the suppliers, the forms were made simple and concise. Respondents could select applicable documents and check off examples of nonconformity types (in addition to writing their own). These nonconformities were based on common risks and nonconformity types associated with that specific industry or product type.





The forms were sent to the suppliers' point of contact, primarily by e-mail.

Questions related to, inter alia:

- The countries and regions where the supplier operate.
- The presence of dedicated resources for Health, Safety, and Environment (HSE) tasks, such as HR departments or Environmental Officers.
- The supplier's existing processes and routines relating to human rights and sustainability efforts.
- HSE-related nonconformities, with industry-specific examples provided to help suppliers identify and report relevant issues.
- Measures and efforts to address risks and negative impacts.

Findings

Defendable identified 12 suppliers we wished to follow up more closely. Of these 12, we were able to contact 8. Of these 8, we received 4 responses.

All the suppliers could tell us that they had organized their HSE work and efforts, most commonly by having an established HR department and similar functions in the organization.

All the suppliers confirmed they had routines and processes in place to address sustainability and work environment challenges in their organization. Some of the mentioned examples include ethical guidelines, procurement routines, and sustainability policies.

None of the suppliers reported having experienced any nonconformity or negative impacts in their organization in 2024. One assessed that a lack of control mechanisms and investigations was likely the reason for the lack of detected nonconformity.

Only 1 of our suppliers reported having uncovered several nonconformities relating to low wages and poor working conditions in their supply chain. While none of these conformities were categorized as zero-tolerance, the supplier nevertheless assured us that they regularly assess their supply chain for such nonconformities and other negative impacts. They were able to document the measures they implemented in response to these findings.

Defendable's takeaways

While Defendable believes we were successful in applying a risk-based approach in identifying the suppliers we wished to follow up, the work has left us with some experiences that we will take into consideration the next time we contact our suppliers:

- We experienced it as challenging to reach several of the suppliers we had decided to follow up on.
- Despite reminders, some of our suppliers did not respond to our inquiries.
- The fact that none of the responding suppliers had identified any nonconformity either in-house or in their own supply chain makes Defendable suspect that many suppliers might lack sufficient processes to detect and address such nonconformity, even though only 1 supplier believed this to be the case themselves.

Going forward, Defendable will:

- Consider how we can increase the percentage of responses.
- Consider whether we can make changes to the questions themselves, as the way the questionnaire forms were built left more to be desired in responses from the suppliers.
- Continue improving our procurement process, to ensure a more streamlined process where all requirements are known and considered.



The Road Ahead

In Defendable, we take onto ourselves the responsibility to make sure that our business and activities are characterized by responsibility and sustainability. Our due diligence assessments and the publication of this report are among several ways we identify how Defendable can make a difference and be open about our efforts. In today's interconnected world, enhancing human rights and sustainability requires global collaboration. Defendable will do our part to bring about positive development in this regard and will continue to raise our expectations for both us and our suppliers.

This document has been electronically signed by the Board of Directors and the CEO.

[Defendable