

Defendable

Account of Defendable's
Due Diligence 2026

About Defendable

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01

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.

The company is mainly owned by Norwegian investors, including some of the employees. Most of our customers are Norwegian and include both large corporations and smaller businesses in the private and public sectors. Our main office is in Oslo, and we also have offices in Gjøvik and Grimstad.

Defendable does not operate in regions where human and worker rights are poorly protected, and our services are not typically considered high-risk.¹

That said, some parts of our business still involve direct and indirect sustainability and human-rights risks, including:

- As an IT organization, Defendable depends on a wide range of IT services, from hardware and equipment to software, applications, and solutions. That means we may purchase products that are categorized as high-risk.

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

- Some of our services involve travel and energy use. Our Managed Detection and Response (MDR) service relies on third-party, cloud-based software and data storage. Our Advisory and Incident Response services also require travel, most often by car, train, plane, or bus.
- Consultancy and incident response work can also involve periods with higher overtime
- Our physical offices need maintenance, cleaning, and a steady supply of products and consumables such as office supplies, coffee, and food. Some items and services tied to facilities (for example cleaning and office supplies) are considered to have associated risks.
- We promote our business in several ways, including buying merchandise and other items for marketing. This can involve purchasing products and materials that are categorized as high-risk.



How We Organize Our Efforts for Sustainability and Corporate Social Responsibility

02

We believe we can make a difference

Throughout the year, Defendable works continuously to improve our sustainability and working environment practices. As a cybersecurity company, we rely on many different suppliers and providers. By doing due diligence assessments regularly, we believe we can spot areas where there is a risk of negative impact and use what we learn to take proportional steps to prevent and reduce unsustainable practices and violations of worker rights and other human rights.

Defendable's goals and commitments

Environmental goals

Defendable is committed to putting in place an effective environmental management system. In practice, that means we aim to continuously reduce our overall environmental impact. We do this by setting and following internal requirements, especially around 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, by following laws and regulations, that no serious accidents happen in our organization. Our employees should have a safe physical, psychosocial, and organizational working environment that is as good as, or better than, 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

Under Defendable's policy, the Board of Directors is responsible for ensuring that we comply with the Transparency Act (åpenhetsloven). The Board has delegated day-to-day responsibility to our Chief Executive Officer (CEO). The CEO makes sure Defendable meets its responsibilities in daily operations. This includes staying up to date on our transparency work, approving policies and routines, and assessing and prioritizing risks.

The Compliance Department and the Eco-Lighthouse Environmental Coordinator keep the CEO and the Board informed about relevant topics, such as identified risks, measures, and recommendations for better documentation, through annual reports and ongoing updates as needed. They also make updates to the documentation when required.

Some key documents related to Defendable's sustainability and working 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.

Our new routines and training for nonconformity reporting have made it easier for employees to report issues and suggest improvements, but we are still waiting to see the full effect.

Defendable's Climate Account

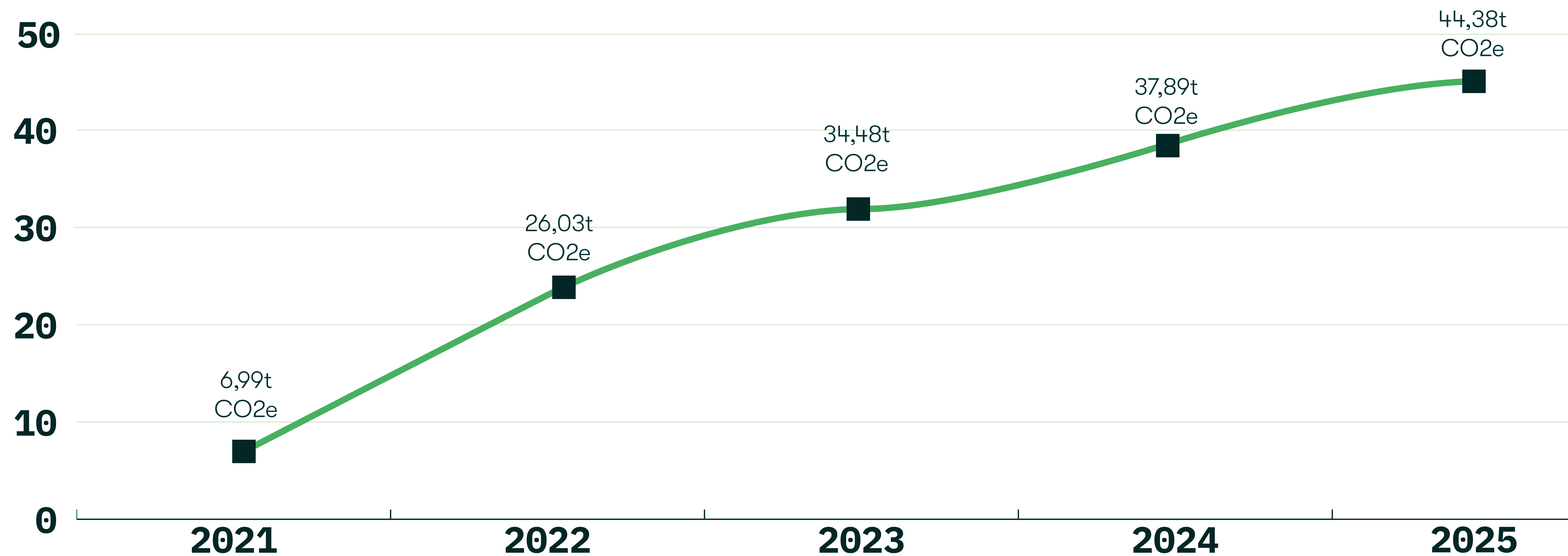
When Defendable became Eco-Lighthouse (Stiftelsen Miljøfyrtårn) certified in 2022, we started reporting emissions, sustainability practices, and other data so we can track our climate account over time. (Figures in this section carry Norwegian text, as they originate from the Miljøfyrtårn report.)

Since we started reporting, Defendable's total emissions have increased. We believe this is mainly due to incomplete data in the first year (2021) and Defendable's general growth as a company.

The figure below shows Defendable's overall emissions between 2021 and 2025:

GHG emissions from scope 1, 2 & 3

↑ +17% from 2024





Total emissions are still rising, but in 2025 this is not because consumption increased. Instead, we added emission figures tied to our own hardware and cloud services (just under 13 tons). We could not obtain these figures in earlier years. If we had left out this category this year, the total emissions would have shown a decrease.

Defendable will keep reporting with this expanded scope and develop a strategy to reduce both consumption and emissions.

Some of our other commitments to reducing climate impact include:

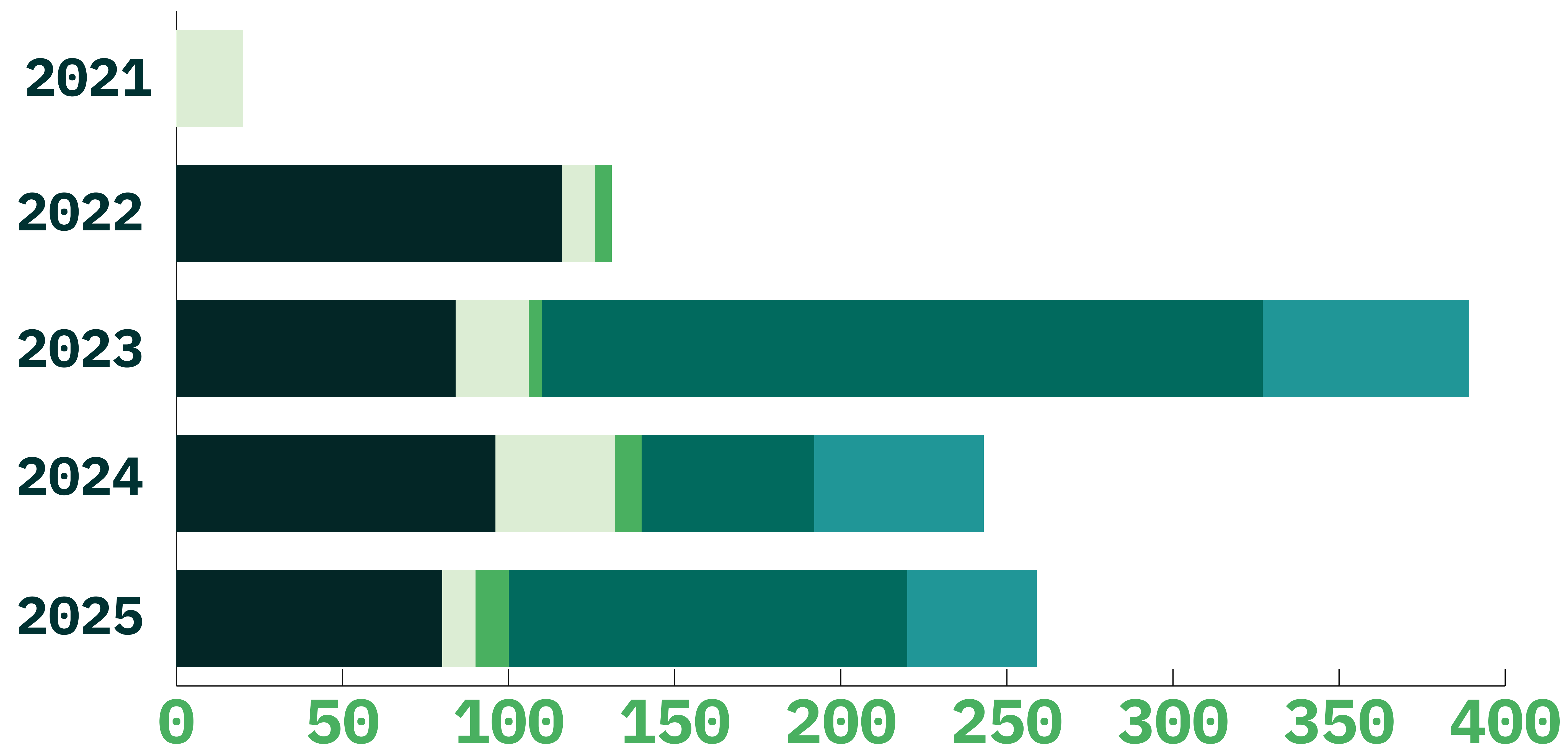
1. Minimizing energy use in our operations and using energy efficient equipment and solutions.
2. Prioritizing suppliers that use renewable energy and operate highly efficient data centers.
3. Actively promoting recycling and reuse of hardware and materials.
4. Reducing emissions from transportation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

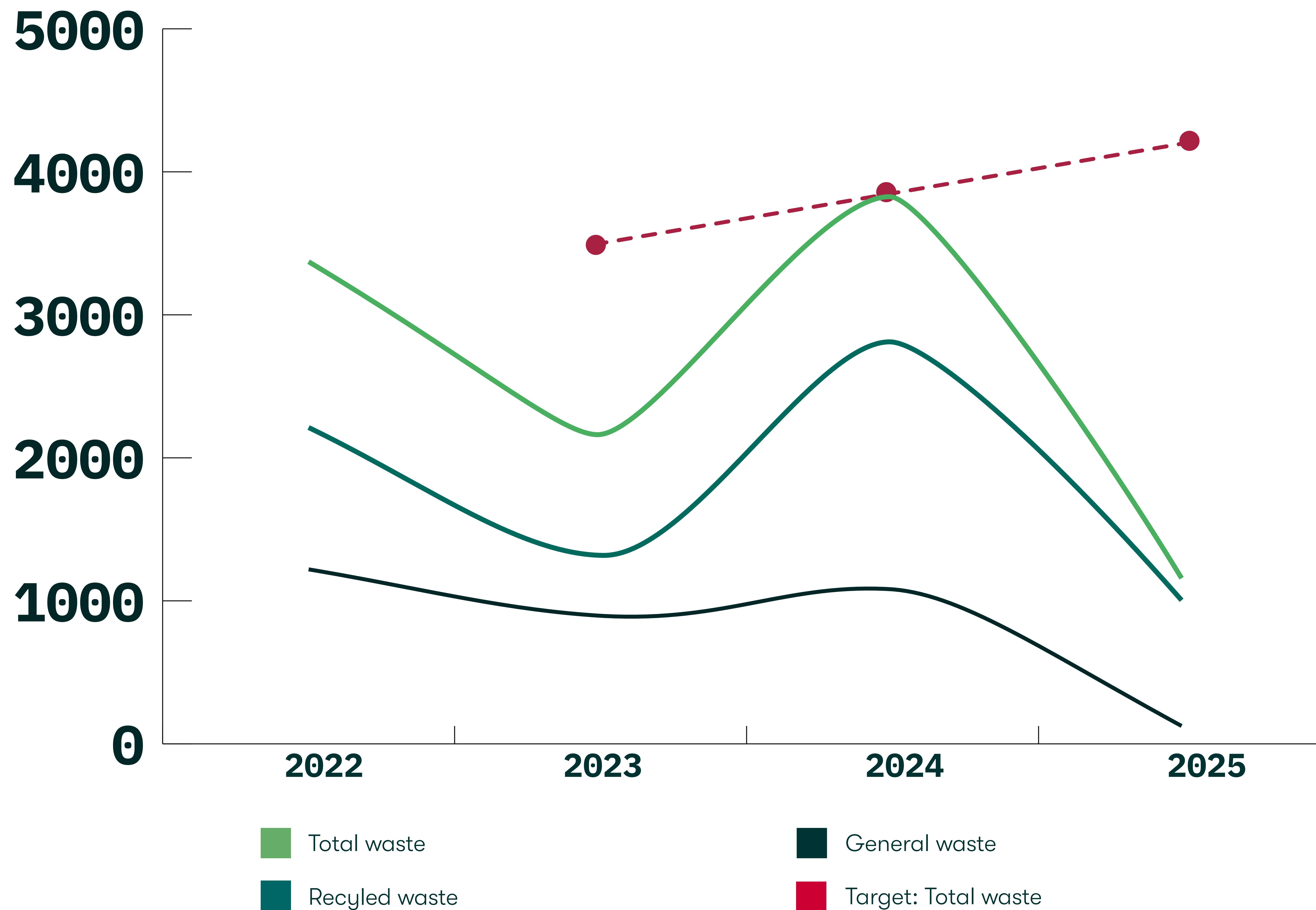
Company travel statistics

As part of our work as a cybersecurity company, Defendable employees regularly travel to customers around the country and attend conferences in the international cybersecurity community. We use several types of transport, from public transit to mileage reimbursement for private cars. Mileage reimbursement decreased by seven percent from 2024 to 2025.

Travel by public transport dropped significantly from 2023 to 2024. In 2025, travel increased again for both flights and trains, but the numbers are still well below 2023. We also see that the increase for trains is higher than for flights (from 52 to 120, compared with 82 to 100).

År	Flyreiser (Norden)	Flyreiser (Europa)	Flyreiser (Verden)	Togreiser	Buss
2025	80	10	10	120	39
2024	96	36	8	52	51
2023	84	22	4	217	62
2022	116	10	6	-	-
2021	-	20	-	-	-





For waste, the amount in 2025 looks dramatically lower. This is because we started measuring waste in kilograms instead of liters, which is a much more accurate method. We also met our goal of 75 percent recyclability, exceeding it by thirteen percent.

Between 2023 and 2025, Defendable increased the sick-leave target to 3,5 %. This is partly because our sick leave is quite low compared to others in our field, and partly because we aim to keep growing and want to accommodate employees in different life situations.

In 2025, both short- and long-term sick leave increased slightly, but the level is still well below the target.

How Defendable Organizes and Carries Out Due Diligence Assessments

Most of the work since the Transparency Act was implemented has been about reviewing and following up Defendable's supply chain, and about addressing internal risks identified in the previous due diligence report. We have also worked to include our annual sustainability reporting, along with efforts to reduce emissions and our climate footprint, into this due diligence assessment and the related report.

Formal responsibility for this due diligence assessment sits with our Compliance Department. When we carry out these assessments, we involve the right stakeholders and resources as needed. We held workshops with people across the organization, including sessions related to Defendable's sustainability reporting and the underlying Eco-Lighthouse recertification process.

Internally, we review relevant policies, routines, and other sources to map risk within Defendable. Through both formal and informal check-ins, we collect information on sustainability and worker rights. We then pull together data and reports for those risk areas, including our sustainability report, climate account, and nonconformity reports.

Externally, we usually follow up selected suppliers based on a risk screening. This screening uses several factors, including the risk level tied to the type of product or service and the purchase size. For the follow-up, we use industry-tailored self-assessment forms.

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



Status on Last Year's Identified Risks and Their Measures

This chapter explains how Defendable has followed up the risks and negative impacts identified in last year's due diligence assessment.

Reporting and managing nonconformity

Earlier assessments showed that our ability to handle nonconformities efficiently and in a prioritized way was held back by a system that needed a major upgrade. We therefore carried out several measures to fix this. Each measure was assigned to a specific person or group to ensure the identified risks were addressed.

Based on these measures, Defendable believes we have lowered the threshold for reporting nonconformities by simplifying the reporting form for all types. The biggest change is on the handling side; we have improved how cases are processed and how risks are assessed. We can now also pull statistics from all reported and handled cases. In addition, we have clarified ownership, both for those handling cases and for the risk owners. Training for nonconformity handlers is currently under way, and it is now mandatory.

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





Going forward, Defendable will:

1. Pay close attention to the effects the changes to our nonconformity reporting system and routines have had.
2. Evaluate to streamline the handling of nonconformity to reduce bottlenecks and administrative overhead.

Clarifications in Defendables guidelines and rules for overtime

Excessive overtime is a common risk for consultancy providers. At Defendable, this risk is expected to be highest in Incident Response. With that in mind, we regularly remind employees that their health and wellbeing come first. Leaders receive training so they can communicate well with employees and follow up on their needs. Employees are, of course, compensated for long hours through time off in lieu and/or overtime pay.

Today, Defendable has an overtime percentage of around 1,5 %, up from about 0,9 % last year. We still consider these numbers relatively low compared to others in the industry. The 2,1 % deviation reported last year was due to flexitime being included in the calculations. Going forward, we will report only on legally defined (or mandated) overtime.

Identified Risks and Negative Impact

The following chapter provides information on risks and actual negative impacts that Defendable uncovered in the due diligence assessment carried out in 2026.

Sustainability

Energy usage

As with many organizations that use cloud-based services, there is a general risk that the organization's "true" energy use becomes less visible when a large share happens indirectly through third parties. As mentioned in Defendable's Climate Account, we will include more devices and systems in our reporting, depending on what the tracking tools cover. Until that is in place, our statistics may be incomplete, which can affect how we prioritize efforts and choose measures. We keep a close eye on this so we can improve tracking over time and reduce our energy footprint.

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

1. Working to incorporate remaining devices and systems that require energy in Defendable into our energy tracking tool.
2. 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.
3. 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 we have not identified any notable risks related to our office facilities, we have still put in place a few measures to improve the sustainability and energy efficiency of our offices.

We have clarified our guidelines and added more visible guidance on waste sorting to support a higher level of recyclability.

Defendable's office facilities are currently undergoing several upgrades that are expected to reduce energy use by about 34%.

- 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

In addition, Defendable has installed improved equipment to measure and monitor indoor air quality. As a result, we have purchased and installed air humidifiers in the SOC and open office areas, helping create a more stable indoor climate and better working conditions.

The office facilities are also subject to ongoing building-level improvements led by the property owner. Updated information from Thon describes additional technical and operational measures that complement Defendable's own initiatives and support continued improvements in energy efficiency and sustainability.

Other risks relating to work environment

Beyond the risks already mentioned, including overtime, Defendable has also identified a risk of long-term consequences from extended periods of physical inactivity. Sitting still for long periods can have both physical and mental downsides for employees.

To reduce this risk and support the benefits of physical activity at work, Defendable will continue to offer all full-time employees 1 hour of paid workout time per week.

Going forward, the following measures will be implemented:

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

Nonconformity

No formal health and safety nonconformities were reported during the period. However, proactive workplace evaluations identified several observations that needed corrective action, even though they did not meet the threshold for formal reporting. These included noise and air-quality issues from construction work, unmarked first-aid equipment, and accessibility concerns in the SOC room. All observations were handled quickly: the office and ventilation system were cleaned, first-aid training was conducted, and equipment was properly labeled.

The lack of formal nonconformities should be seen in the context that Defendable recently updated its reporting system. Last year's assessment found a gap between known incidents and reported nonconformities, which led to changes in routines and handling processes.



Defendable's Assessment of Risk in our Supply Chain

Background

Last year, Defendable reported on our follow-up of selected suppliers based on their assessed risk profile. We identified 12 suppliers we wanted to follow up more closely. We were able to contact 8 of them, and we received 4 responses.

We noted the following takeaways:

- 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 0 % of the responding suppliers had identified any nonconformity either in-house or in their own supply chain makes Defendable assume that many suppliers might lack sufficient processes to detect and address such nonconformity, even though only 1 supplier (25%) believed this to be the case themselves.





We originally planned to do a similar follow-up this year. After reviewing last year's results, however, Defendable decided to improve our methodology and overall approach instead, focusing on:

- 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.

New methodologies for carrying out supplier controls

Defendable has been exploring alternatives to contacting suppliers by e-mail for these controls, and we may also refine the screening and risk-classification process we use. Today, the assessment is based on criteria such as country risk, product risk, and industry risk, in line with the OECD Guidelines for Due Diligence for Responsible Business Conduct. We also consider purchase volume and whether any previous negative impacts have been identified.

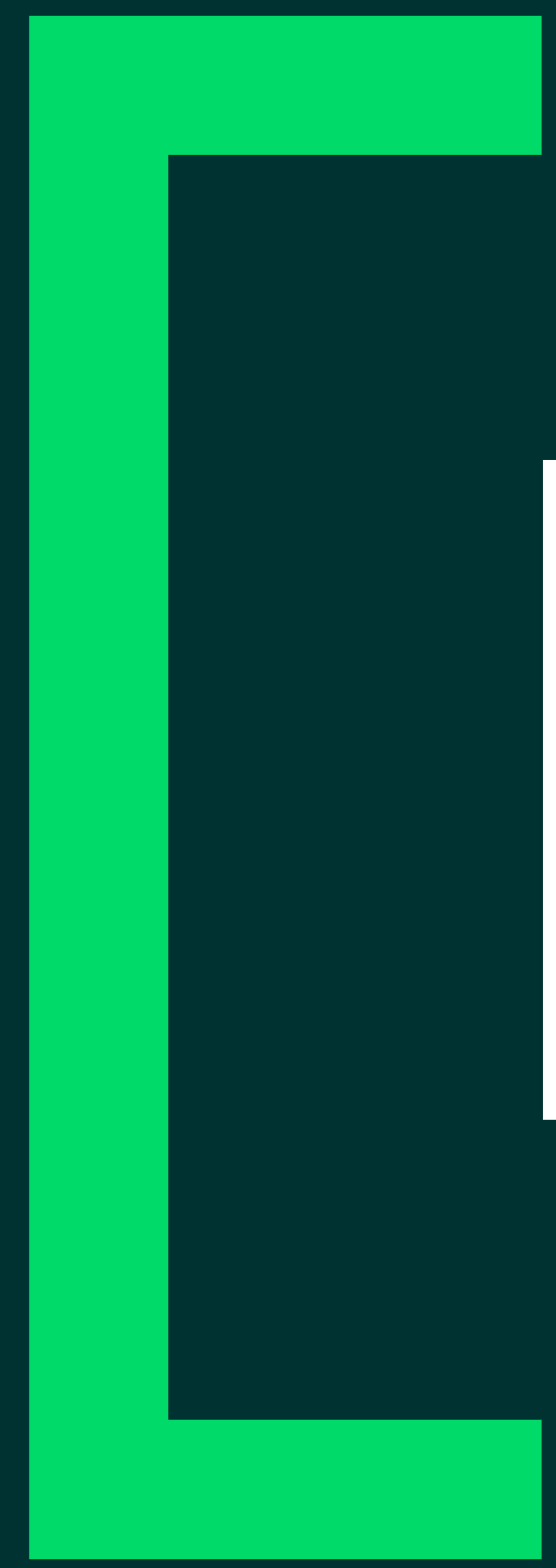
Improvements to our procurement process

In cooperation with relevant stakeholders, Defendable has been making steady improvements to simplify and streamline our procurement process. This work continues into 2026, and we expect it to have a positive effect on ethical procurement of products and services as the sub-tasks become more precise and targeted to what is being procured. Through this joint effort, we will also ensure that Defendable's needs and responsibilities, including information security, privacy, work ethics, environmental impact, and more, are clearly reflected in the procurement process. Implemented in response to these findings.

The Road Ahead

At Defendable, we take responsibility for making sure our business and activities are characterized by responsibility and sustainability. Our due diligence assessments and this report are two of the ways we identify where we can make a difference and stay transparent about our efforts. In today's interconnected world, strengthening human rights and sustainability requires global collaboration. Defendable will do our part to contribute to positive development and will continue to raise expectations for both us and our suppliers.

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



Defendable