

An aerial photograph of a stunning fjord. The water is a vibrant turquoise color, contrasting sharply with the dark, rocky terrain. The surrounding mountains are covered in patches of snow, creating a high-contrast, textured landscape. A winding asphalt road follows the curve of the fjord's edge. In the upper left corner, a small white building with a dark roof is visible on a rocky outcrop.

CEƏAL

2024

**Sustainability
Report**

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About us

Cegal is a tech company writing digital success stories. By delivering leading industry software, world-class consulting, and mission-critical cloud solutions, we are shaping the digital future. We are in nine countries, and we are growing to become a leading global technology powerhouse for the energy industry and a contributor to the green transition.

Our three main areas of business are:

- Industrial Software
- Consulting and Managed Services
- Cloud Operations

We develop and sell software to extend, improve, and speed up workflows, and we offer the development of high-quality customized software solutions. In 2023, software represented 12% of our revenue.

Our highly experienced on-site consultants, expert geo-modelers, and multi-skilled consultants offer value-adding services to our clients.

We offer services within a wide range of areas such as Process governance, Specialized monitoring and maintenance, product excellence, Subsurface data services, and projects. In 2023, consulting represented 35% of our revenues.

Our cloud operations solutions provide high-performance IT systems and customized software solutions to more than 45,000 end users. We support more than 3000+ applications, and our support center offers a single point of contact for all IT-related questions.

We have five data centers and more than 320 customers. In 2023, Cloud Operations represented 38% of the group's total revenues, of which the majority are long-term recurring revenue.

The Group provides hardware and software licenses for resale to our customers, typically bundled with sales within our other business units. In 2023, third-party resale represented 14% of our revenues.



Sustainability strategy

Our sustainability strategy is divided into three pillars, each corresponding to one of the letters in the acronym ESG, environment, social and, governance. To us, sustainability is a prerequisite for reaching the goals we have set out for ourselves.

1. We contribute to a better environment

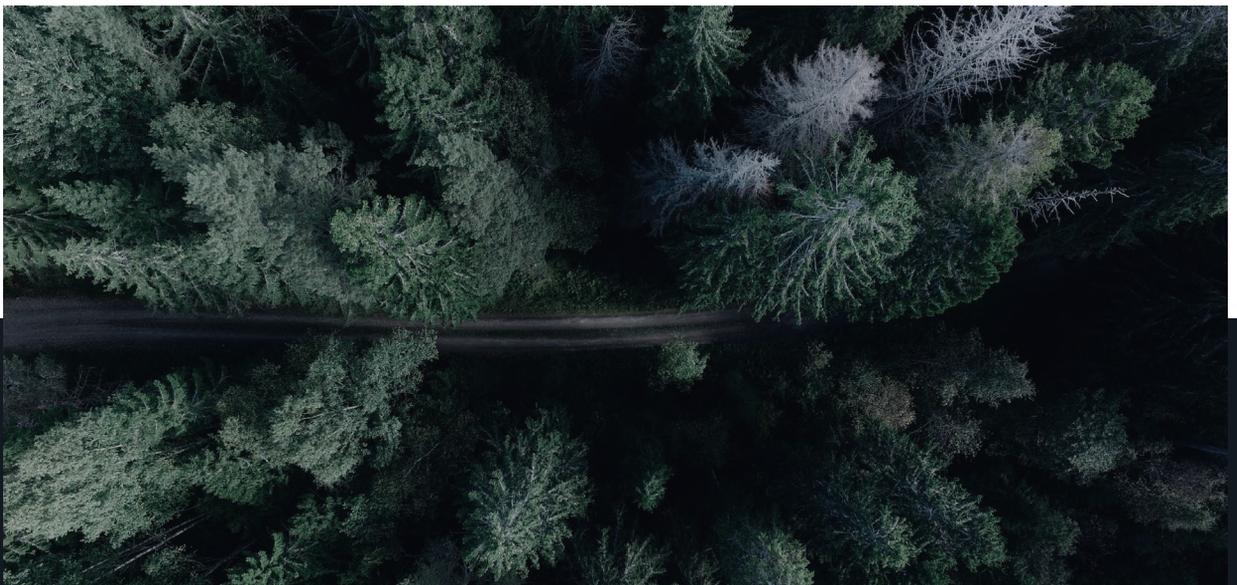
Taking care of the environment is an issue we don't only care about but contribute to.

2. We take social responsibility

Our goal is to build a legendary company that our employees love to work for, and that our customers love to work with.

3. We are a responsible player

We must take responsibility beyond ourselves to contribute to the global sustainability agenda





Cegal Management System

In Cegal we put our pride into professional deliveries of our business, services and products. We are committed to conduct safe operations considering all aspects of health, safety, environment and continuous improvement to secure a high level of quality.

To deliver on these promises and expectations a consistent approach is required, and this is founded in Cegal Management System. All of us are expected to follow the standards for behavior, delivery and leadership as they are defined in the Cegal Management System. This is a personal responsibility and a leadership requirement.

I am confident that this approach to deliveries empowers us and makes Cegal robust to meet the challenges as a global provider.

Dagfinn Ringås
Group CEO



ISO Certifications

As a global IT company dedicated to providing top-tier cloud operations, industry software, and services to the energy sector, our commitment to quality, environmental management, information security, and occupational health and safety is demonstrated through our adherence to four key ISO certifications.

ISO 9001 ensures that our management system meets the international benchmarks for quality, enhancing customer satisfaction and operational efficiency.

ISO 14001 reflects our dedication to environmental management, helping us minimize our environmental footprint while complying with applicable laws, regulations, and other environmentally oriented requirements.

ISO 27001 is crucial for our business as it assures customers of our commitment to maintaining the highest standards of information security.

ISO 45001 underscores our focus on occupational health and safety management system, protecting our employees and ensuring safe operational practices.

These certifications not only signify our adherence to international standards but also strengthen our reputation as a reliable and responsible partner in the energy industry.



Key impact areas across our value chain

	Suppliers	Operations	Customers
Environmental matters			
Climate change		X	X
Impact of products and services			X
Circular economy	X	X	
Social matters			
Own workforce		X	
Supplier transparency	X		
Affected communities		X	
Governance matters			
Data security and privacy	X	X	X
Business conduct	X	X	X

Climate change

Emissions result from cloud computing and business travel. Insufficient management can expose firms to reputational and litigation risks, given the pressure to align with climate agreements.

Impact of Products & Services

Relates to the ambition of a company to have a positive impact on society by actively working towards existing societal challenges. This impact is measured with set targets, with the positive impact publicly marketed.

Data Security and Customer Privacy

Managing data security and privacy avoids lower revenues due to lost consumer confidence and churn, preventing financial impacts stemming from legal exposures (e.g., GDPR).

Targeted sustainable development goals

Business activity /Impact	Relevant SDG and Impact KPI	What	Who	Contribution
Stimulate training and development for employees and NGO	 <p>4: Ensure equitable quality education and promote lifelong learning opportunities for all</p> <p>4.4.1 Proportion of youth and adults with information and communications technology skills</p>	<p>Continuously provide practice and training to retain a high level of skill set in our organization.</p> <p>Mentoring program management.</p> <p>The Children's EdTech project is for children to learn through tablets and physical tasks</p> <p>Improving Learning Environments Together in Emergencies (ILET)</p> <p>Cybersecurity advisory for Save the Children Norway,</p>	<p>Cegal employee</p> <p>Non-governmental organization</p>	<p>Innovation: Employees with ICT skills can bring new ideas and innovative solutions to the business, leading to growth and competitive advantage.</p> <p>Digital inclusion: Providing training and development opportunities for individuals with limited access to technology can help bridge the digital divide and promote digital inclusion.</p>
Empower women throughout all levels in the company	 <p>5: Gender equality and women's empowerment</p> <p>5.5.2 Proportion of women in managerial positions</p>	<p>Ensure women's full participation and equal opportunities for leadership at all levels.</p> <p>Increase proportion of women in managerial positions.</p> <p>Diversity, Equity, Inclusion, and Belonging (DEIB) (both internally and externally),</p> <p>Diversity in recruiting with focus on hire Women in tech.</p> <p>Even ratio of basic salary and remuneration of women to men. Today we have achieved 97%</p>	<p>All employee at every level</p>	<p>Overall, gender equality is essential for creating a more just and equitable society that benefits everyone.</p> <p>By prioritize gender equality is more likely to retain employees, particularly women.</p> <p>Improved reputation: Companies that prioritize gender equality are often viewed more positively by customers, investors, and the public. This can lead to increased brand loyalty and a stronger reputation, which can help attract and retain top talent.</p>
Recycle and supplier cooperation	 <p>12: Ensure sustainable consumption and production patterns</p> <p>12.5.1 National recycling rate, tons of material recycled</p>	<p>Waste management plans for maximal recycling at end of life of electrical and electronic equipment.</p> <p>Help customer reduce their environmental impact by extending the life of IT equipment, reducing e-waste, and promoting circular economy practices.</p> <p>Helping customer to analyzing and reducing the impact of products and services promotes resource and energy efficiency.</p>	<p>Supplier</p> <p>Customer</p>	<p>Promote sustainable consumption and production patterns, specifically promoting resource and energy efficiency, sustainable management of natural resources, and reduction of waste through recycling and reuse.</p> <p>Innovation: Reusing TCT equipment can encourage innovation and creativity, as businesses find new ways to repurpose and adapt existing technology to meet their needs.</p>
Client emissions mitigated through software developed and services provided	 <p>13: Take urgent action to combat climate change and its impacts</p> <p>13.2.2 Total greenhouse gas emissions per year</p>	<p>Cegal enables customers to move their IT infrastructure and applications to cloud platforms.</p> <p>Cegal data centers are powered by renewable energy, contributing to even more reduction in CO2 emissions</p> <p>Cegal is facilitating for improved sustainability and a basis for further reductions through our associated products and services</p> <p>Our cloud services can save up to 500 kWh of energy/day per 100 workstations switched.</p>	<p>Cegal cloud customer</p> <p>Cegal own operation</p>	<p>Reducing the carbon footprint of operations directly contributes to this goal by lowering greenhouse gas emissions. Contribute to global efforts to combat climate change.</p>





ESG progress in 2023

Priority project	Description of project	Progress in 2023
1 Initiate Carbon Reduction Strategy	<ul style="list-style-type: none"> • Mapping of reduction target baseline and calculation of emissions • Manage environmental impact and become carbon neutral in 2024 	<ul style="list-style-type: none"> • Work continues to set a carbon reduction strategy baseline. To expediate this process, Cegal have committed to the science-based targets initiative to ensure adherence to a rigid process. • The goal of becoming carbon neutral in 2024 for selected areas will not be reached, resources will instead, be allocated to the work of setting a science-based reduction target
2 Take social responsibility by contributing to SDG 4 – Quality Education	<ul style="list-style-type: none"> • Continue to support Save the Children (Redd Barna) through involvement in projects related to technology, are topic core to Cegal's business 	<ul style="list-style-type: none"> • Cegal launched a project named "Goosebump" in collaboration with Save the Children. Cegal employees contributed by solving technical issues a Redd Barna webtool named ILET. • Cegal has also provided cyber-security advisory to Save the Children International, which was very well received
3 Further work on Diversity, Equity, Inclusion and Belonging	<ul style="list-style-type: none"> • Launch initiative to create an advisory board for diversity at Cegal. One key aspect will be to address a broader set of targets groups of diversity through an intersectional approach • Launch a project to create unconscious bias training 	<ul style="list-style-type: none"> • The intersectionality approach took form through a month-long campaign that produced eight knowledge articles on different gender identities, two of which were published externally • Work continues on the project related to unconscious bias training
4 Increase transparency through compliance with the Norwegian Transparency Act	<ul style="list-style-type: none"> • Establish processes and documentation to comply with the Norwegian Transparency act 	<ul style="list-style-type: none"> • Cegal successfully published a Transparency Act – Due Diligence Report on Cegal.com in May 2023



We contribute to a better environment

The UN and the EU have identified the technology industry as one of the most important drivers for achieving the UN Sustainable Development Goals.

Being a part of this industry that is one of the premise providers and has a strong influence on other industries, we have a social responsibility beyond ourselves.

Based on our unique knowledge, we will contribute to creating a new sustainable ecosystem. This means that we must contribute to responsibility in our value chain by setting requirements for our suppliers and partners.

Taking care of the environment is an issue we not only care about but contribute to. Our focus within the environment is divided into three main areas:

1. Reducing own carbon footprint. We manage our environmental impact. Our ESG roadmap involves a commitment to Science Based Targets initiative (SBTi) meaning we will define our reduction target by end of 2025 while the work on carbon reduction has already begun.
2. Supporting our customers in achieving their sustainability goals by providing digital technologies supporting reduced emissions.
3. Super skilled tech people who contribute to environmentally friendly solutions and responsible consumption and production by our customers.

We are determined to continuously contribute to taking care of our planet. Our work is aligned with the international standard ISO 14001:2015 Environmental Management System.

We contribute to a better environment

Climate change

In 2023, Cegal took another step towards setting a reduction target by increasing the scope and quality of our GHG accounting exercise.

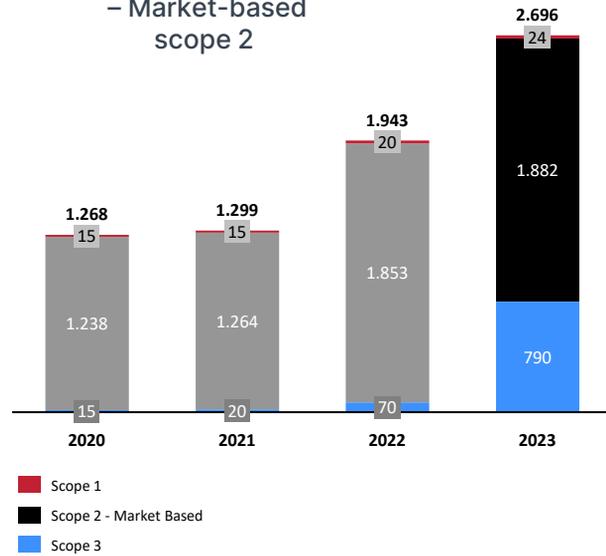
In 2023, Cegal calculated scope 2 emissions using a market-based approach for the first time. Using historic energy data, this calculations were also done for historic years.

The approach was also improved in the area of scope 3 emission calculations, with improved data collection for cloud computing, travel, commuting and home office work.

The improved scope 3 approach is the main reason for the increase in total emissions from 2022 to 2023.

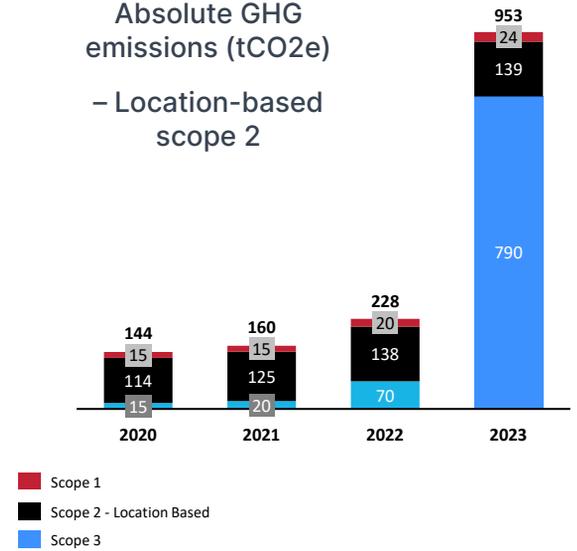
Absolute GHG emissions (tCO2e)

– Market-based scope 2

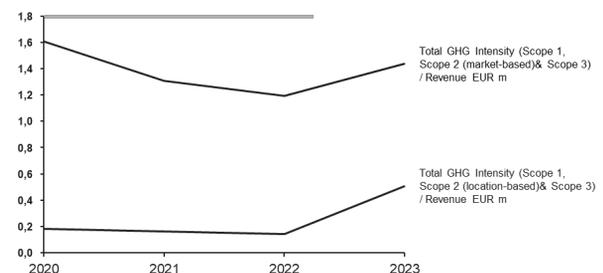


Absolute GHG emissions (tCO2e)

– Location-based scope 2



Emissions Intensity





Energy and carbon own operations

Setting the baseline for becoming net zero

Committing to science-based climate targets

Cegal has committed to set a science-based climate target for reducing greenhouse emissions in line with the 1.5C Paris Agreement.

Science Based Target initiative (SBTi) provide a clearly defined pathway for companies to reduce greenhouse gas (GHG) emissions, helping prevent the worst impacts of climate change and future-proof business growth.

Targets are considered science-based if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement – limiting global warming to 1.5°C above pre-industrial levels.

Within two years we will set our science-based target and commit to it. That means that we need to assess our current emissions and create a target that we believe we can reach and that is in line with the science-based target process.

Our GHG emissions calculation was not detailed enough to establish a baseline with significant accuracy.

To improve the GHG emission data we will from 2023 base the measurement and calculation on Position Green ESG software and advisory expertise.

New baseline for GHG calculation to be set based on 2024 measurement.

Setting the baseline for becoming net zero

We are planning for mapping what the baseline would be for becoming net zero. We believe that ensuring the scope of this work is an important step towards making sure we do what we say.

Cont. Energy and carbon own operations



Reducing carbon footprint

We are committed to reducing our energy consumption and associated carbon emissions from our own operation

Cloud powered by renewable energy

Datacentres

Cegal's cloud solutions are primarily based in Norway and are powered by hydropower. The energy consumption of these data centers is closely monitored.

The additional data centers in the UK and the Netherlands are powered by 100% renewable electricity.

Our data center is powered by 95% location-based renewable electricity

Many customer solutions are built as hybrid solutions, where some applications and data are provided from our data center, while others are provided by public cloud providers such as Microsoft, AWS, etc.

Reduce power consumption using more efficient servers

To diminish power consumption, the Contractor is adopting more efficient servers equipped with cutting-edge power management tech and streamlined hardware components.

These servers feature energy-saving processors, memory, and storage solutions, leading to notably decreased energy consumption. In addition, optimizing server virtualization and workload consolidation techniques can enhance resource utilization, effectively curbing power usage.

Microsoft Azure servers powered by renewable energy

Microsoft Azure servers achieve complete reliance on renewable energy sources through a multifaceted approach. Firstly, Microsoft leverages Power Purchase Agreements (PPAs) to secure wind, solar, and hydroelectric power from diverse locations, injecting green energy into the grid. Secondly, Microsoft invests in direct on-site renewable installations, such as solar panels on data center rooftops.

Moreover, Microsoft employs advanced energy management technologies to optimize energy usage and minimize waste. This comprehensive strategy ensures that all operations of Azure servers are powered by sustainable and eco-friendly energy sources.

Facilities and own workforce

Initiatives have been implemented to reduce our carbon emissions, including motion sensor lighting at multiple offices, hybrid working opportunities, promotion of public transport use, and cycle-to-work schemes.

Cegal is a member of the "Hjem-Jobb-Hjem" initiative promoting the use of public transportation and encouraging employees to make use of the initiative.

All Cegal offices have recycling of waste implemented in cooperation with landlords. Sorting stations for paper, residual waste, glass, electrical components, and batteries are implemented.

Agreements have been implemented with suppliers for the return of computer and mobile equipment. This includes policies for the safe erasure of data, re-usage, or recycling of equipment. For equipment that has been used for a longer period, Cegal uses a supplier for safe re-usage and recycling.

We contribute to a better environment

Energy and carbon

We are committed to reducing our energy consumption and associated carbon emissions. By end of 2025 we have set our science-based targets carbon reduction goal and started our reporting on yearly carbon emissions for net neutrality in 2050.

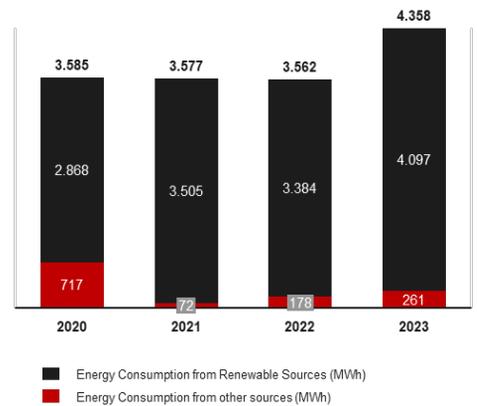
Energy and carbon is managed and monitored in accordance with the ISO 14001 certification (certified since 2021).

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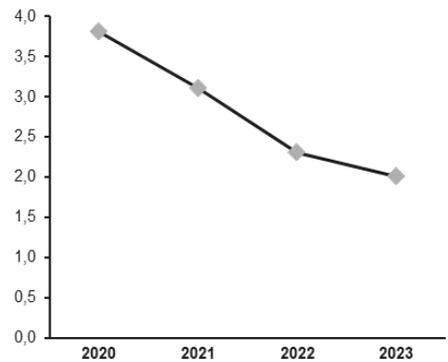
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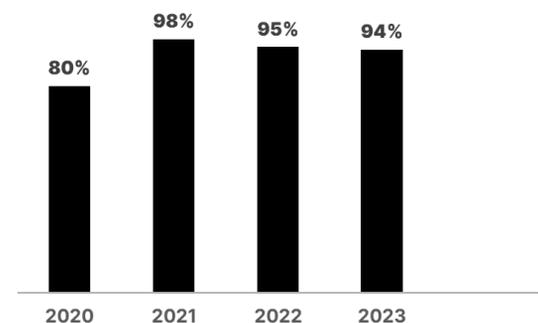
Energy consumption | MWh



Energy intensity MWh | NOKm revenue



Total share of renewable electricity





Carbon emissions market and location based

Emissions GHG Protocol (metric tonne CO2 equivalent)	2020	2021	2022	2023
Scope 1	15	15	20	24
Scope 2 Location-Based	114	125	138	139
Scope 2 Market-Based*	1238	1264	1853	1882
Total Scope 1 & 2 Location-Based	129	140	158	163
tCO2e / NOK Revenue Millions (scope 1 & 2 Location-based)	0.163	0.141	0.097	0.087
Scope 3				
Category 1: Purchased goods & services				81
Category 3: Fuel- and energy-related activities			70.06	66.12
Category 5: Waste generated in operations				0.65
Category 6: Business travel				191.75
Category 7: Employee commuting				450.67
Total Scope 3			70.06	790.19

* Cegal have in 2023 calculated market-based scope 2 emissions for the first time. Datapoints from 2020-2022 have been back-calculated using historic input data.

We contribute to a better environment

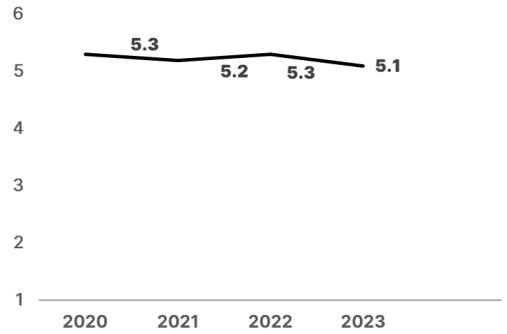
Impact of products and services

Our mission is to create digital success stories in meaningful and sustainable industries. To work towards this mission, we specialize in the energy industry and have set out specific goals of linking customer projects to the UN's sustainability goals.

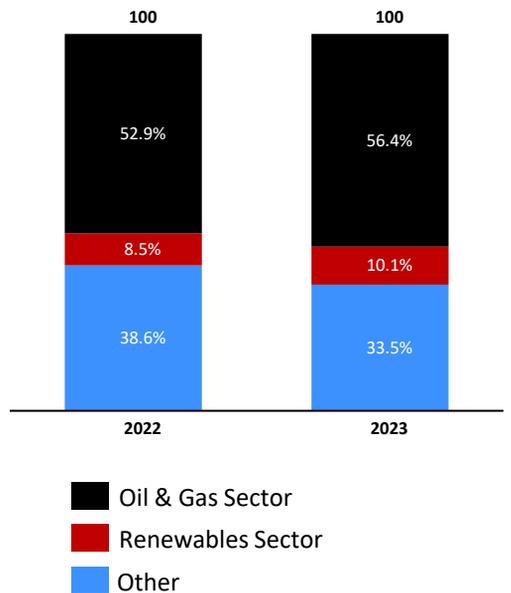
Cegal's software offerings include smart applications for the energy sector, enabling different technologies to work together.

Client emissions are mitigated through software developed and services provided.

End-user survey (Out of 6, 6= top score)



Client overview per relevant sectors



Cont. Impact of products and services



Cloud Energy and Carbon Reductions

We can create digital success stories related to the green transition due to our solid industry expertise and extensive experience in helping companies transition to cloud services.

Cegal enables customers to move their IT infrastructure and applications to [cloud platforms](#). Cloud data centers in general also help reduce CO2 emissions because the cloud utilizes hardware and software more efficiently. The emission reduction comes from smarter energy use, optimized cooling, optimization, and better utilization of servers, storage, and other hardware.

Cegal data centers are in addition powered by renewable energy, contributing to even more reduction in CO2 emissions. Our cloud services can save up to 500 kWh of energy/day per 100 workstations switched.

[Read the article: The cloud saves tonnes of CO2 emissions](#)

Cegal's cloud platform, called Cetegra, specializes in the energy industry. It drives digitalization and integrates data, applications, and insight to improve workflows and foster collaboration.

Significant reductions are achieved when customers transfer to a cloud-based IT solution, and with Cetegra, Cegal is facilitating for improved sustainability and a basis for further reductions through our associated products and services.

Power and Renewables

The Cetegra cloud platform has a proven effect in reducing the carbon footprint when compared to on-premise IT hardware installations.

Significant reductions are achieved when customers are transferred to a cloud-based IT solution, and with Cetegra, Cegal is facilitating for improved sustainability and a basis for further reductions through our associated products and services.

Cegal is currently taking Cetegra to the power and renewables market in the Nordics, through technology development and inclusion of relevant products and services for this market.

A dedicated development team for Cetegra Renewables is established, working on new functionality and workflows specific to this customer segment. Similarly, a new sales team is in place to focus on building the business and driving continued development of this new product.

Emissions reporting

Cegal Energy Settlement is a commercially available software product for insight and quality assurance of measurement values of power consumption and local power production (solar). The tool provides an automatic overview of power distribution for commercial buildings, based on consumption and local production.

Customers thus get an excellent overview of their power usage, together with an insight into the use of renewable power.

Cetegra is under continued development and a new module in the Cetegra family is being considered. The new module will provide the customer with tools to assess their emissions related to Cetegra products and infrastructure, including Azure and Oracle Cloud.

The plan is to use the data feed of the emissions to report consumption regularly and give continuous feedback on emission reduction activities to shorten the feedback loop, increase focus, and show the immediate effect of reduction initiatives.

The intention is to use the new module internally in Cegal to calculate the emissions overview and increase awareness, but also be part of the Cetegra offerings to our customers.



Cont. Impact of products and services

Energy control

Repurposing competence to contribute to ESG and sustainability is part of taking responsibility and contributing to the green transition.

Cegal played an important role in changing how organizations manage and reduce their energy consumption through the development of None. None is user-friendly energy monitoring system that support customer to make smarter energy choices.

This collaboration with None has resulted in a platform that not only offers detailed insights into energy and water usage but is also expanding to cover waste management.

By providing businesses with a clear overview of their energy consumption patterns, None empowers them to identify and address inefficiencies that have traditionally gone unnoticed.

The success stories of users who saw their energy consumption for heating and tap water halve, underscore the system's potential to drive significant energy savings and contribute to the green transition.

The foundation of this transformative tool lies in our expertise in both technology and the energy sector, enabling the development of a solution that meets the complex needs of industries, retail chains, municipalities, and more.

Our approach to "full lifecycle management" ensures continuous improvement and adaptation of the system, reflecting our commitment to sustainability and efficiency. By making energy consumption data accessible and actionable,

None facilitates more informed decision-making, allowing for immediate energy savings and supporting broader environmental goals. As we extend our platform to encompass waste management,

None is set to become an indispensable tool for businesses seeking to enhance their sustainability practices, demonstrating our dedication to driving the green transition and promoting responsible consumption and production.

Cont. Impact of products and services



Energy efficiency

Technology is a key element for securing energy efficiency. The Cegal software product EnergyX provides full control over gas transportation down to the molecular level, detecting and preventing wastage and leaks. Sustainable gas production is about promoting resource and energy efficiency and sustainable infrastructure.

Cegal has impacted the way gas is managed and controlled on the Norwegian Continental Shelf (NCS) through its EnergyX products, delivering control over gas transportation for Gassco, a leading European gas transporter. This solution ensures Gassco’s capability to monitor and manage gas flow from production to final distribution across Europe with meticulous precision.

Traditionally reliant on spreadsheets for tracking and managing the extensive data associated with gas transport, Gassco faced challenges such as data inaccuracies, labor-intensive manual processes, and difficulties in information sharing both internally and with external partners.

The transition to Cegal’s EnergyX Control has automated critical processes, notably in measurements and allocation, significantly enhancing accuracy, productivity, and security in gas transportation operations.

This transformation facilitated by our expertise not only optimized operational efficiency but also advanced the sustainability and security measures in gas transport management. EnergyX Control’s deployment of an online dashboard for real-time monitoring and its direct integration with reporting systems ensures data integrity and facilitates smoother workflows.

Looking forward, the integration of APIs promises further automation, reducing manual tasks in reporting, invoicing, and control.

Cegal’s collaboration with Gassco, built on a foundation of extensive industry and technological expertise, exemplifies a commitment to sustainability, aiming to incorporate at least one of the United Nations’ sustainability goals into its operations.

By providing full control over gas transport down to the molecular level, Cegal supports Gassco in achieving more sustainable production practices, highlighting the importance of resource efficiency and sustainable infrastructure in the oil and gas industry.



Cont. Impact of products and services

Carbon Capture and Storage

There is a strong need to decarbonize the industry, both the oil and gas industry and other high-carbon emissions industries. Carbon capture and storage (CCS) is identified as an activity that can make a significant contribution to reducing these emissions mitigating climate change and achieving net-zero targets.

Geoscience expertise has a critical role in de-risking technical aspects of CCS developments. Cegal's portfolio of geoscience products gives incredible insight into CCS challenges beyond traditional geo-mechanics modeling. Specifically, the Blueback Geophysics toolbox and Blueback Investigator are used for standard CCS workflows today to understand potential areas for CO₂ storage, control pressure build-up, and storage integrity, and overall reduce the risk of leakage of CO₂.

Cegal has also entered a partnership with NGI (Norwegian Geotechnical Institute) to advance carbon, capture and storage technologies. The partnership combines Cegal's domain knowledge in geoscience, IT solutions, and commercialization capabilities with NGI's geo-mechanics expertise and research and development.

Cegal has developed subsurface software for the energy business over the last 20 years, including industry standards in oil and gas. This software is presently used better to understand the storage capacity for CO₂ in the subsurface. Together with a strong consulting team with domain understanding, this creates value by speeding up the work and de-risk the subsurface storage.

NGI has, over the last 15 years, been involved in developing new tools and knowledge for the safe and efficient storing of CO₂ in the subsurface. New knowledge addressing seal integrity for CO₂ storage is ready to be implemented in industrial tools and workflows. Collaboration between researchers and established software developers is a step forward for the efficient characterization and development of CO₂ storage sites in the industry and worldwide.

The Cegal software product Cegal Prizm connects domain applications (Petrel*) with domain data through Python scripting to bring insight and facilitate collaboration between teams in the companies to make better decisions on how to inject CO₂ into reservoirs.

Further, Cegal's EnergyX software enables CCS projects to plan and execute according to CO₂ contracts with several industrial partners, optimizing operational procedures for CO₂ transport, injection, and long-term storage.



Cont. Impact of products and services

Offshore Wind Industry

The Cegal software product portfolio within the geoscience domain turns out to be very relevant for some workflows for determining locations for offshore installations for wind farms.

A thorough investigation of the ocean floor and shallow subsurface is required when deciding locations for the installations. Many of the wind farm developers are energy companies already with significant geoscience expertise and use software products like Petrel*.

The Cegal product portfolio is often used as part of a Petrel* workflow, and tools like Blueback Toolbox, Blueback ODISI, Blueback Investigator, and Cegal Prizm are used when planning offshore wind projects.

Cegal has customers who have used our tools for these purposes by analyzing the ocean floor, more secure and efficient locations were selected for the windmill installations and the power cables.

Geothermal

The Cegal software product portfolio within the geoscience domain is also very relevant for some workflows for determining locations for drilling geothermal wells for heating purposes. A thorough investigation of the shallow subsurface is required when deciding locations for these installations' geothermal plants.

Many heating plant developers are energy companies with significant geoscience expertise and use software products like Petrel*.

The Cegal product portfolio is often used as part of a Petrel* workflow, and tools like Blueback Toolbox, Blueback ODISI, Blueback Investigator, and Cegal Prizm are used when planning the location of these plants.

Cont. Impact of products and services

Success Story: BW Energy

BW Energy moved its IT infrastructure from on-prem to the cloud to create a solid platform for digital transformation and support agile operations. As part of the transition, BW Energy also implemented Cegal Cetegra.

[Read how BW Energy grew 400% without adding IT headcount >](#)

The digitalization and efficiency provided by Cetegra fuel BW Energy's competitive advantage and growth by impressive numbers:



Up to 30%

Increased productivity:
time gained per full-time
employee.

Up to 65%

Cost-efficient:
reduction in application
management costs.

At least 70%

Improved sustainability:
reduction in CO2
emissions.



Circular economy

Own operations

Cegal has waste management plans for maximal recycling at end of life of electrical and electronic equipment.

At its end of life, the equipment undergoes preparation for reuse, recovery or recycling operations, or proper treatment in accordance with Annex VII to Directive 2012/19/EU on waste electrical and electronic equipment.

We are committed to the field of sustainable IT and are contributing to the green transition within the technology and energy sectors. We want to influence the digital and environmental future positively by integrating complex IT solutions into digital success stories, with a strong emphasis on supporting the shift towards renewable energy and reducing carbon emissions

Dell and Cegal - sustainable IT circularity

The adoption of Dell Technology Rotation underscores our commitment to sustainable IT practices, achieving remarkable improvements in data delivery speed (58%), a significant reduction in data center footprint (80-90%), and a high rate of reuse for PCs, laptops, displays, and peripherals (95%).

This approach not only enhances business value but also prioritizes performance alongside sustainability, demonstrating a balance between technological advancement and environmental responsibility.

By implementing Dell Technology Rotation, Cegal contributes to the circular economy, minimizes e-waste, and guarantees the latest technology for critical data storage and protection, ensuring near-perfect uptime and extending the lifecycle of IT assets.

This holistic approach to sustainability is part of our role as a transformative force in both the tech and energy industries, paving the way for a more sustainable and environmentally responsible future.

Foxway and Cegal

For other equipment we use Foxway to secure erasure of data and lifecycle management.

Their goal is to help businesses reduce their environmental impact by extending the life of IT equipment, reducing e-waste, and promoting circular economy practices.

Foxway also provides secure data erasure and responsible recycling services to ensure that sensitive data is properly disposed, and that electronic waste is handled in an environmentally responsible manner.

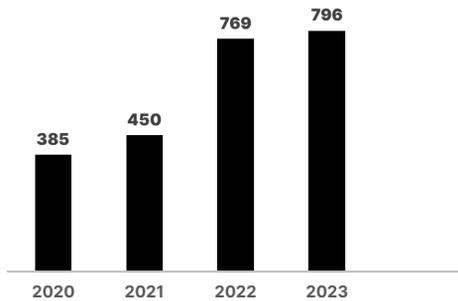


We take social responsibility

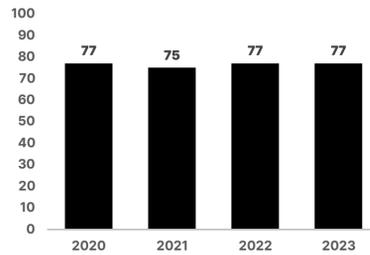
Our goal is to build a legendary company that our employees love to work for, and that our customers love to work with. This is why we focus strongly on meaningful work and diversity. We want our employees to have meaningful work where equal pay for equal work is key. Every year we arrange social engagement campaigns where we work voluntarily.

Own workforce

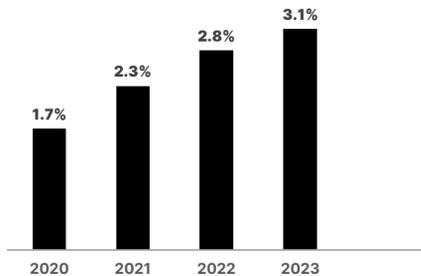
Number of employees #



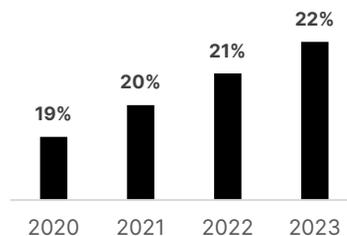
Employee satisfaction score (#)



Total absenteeism in %



Gender diversity in total workforce(%) 25-Target





Own workforce

Workplace health and safety management

Cegal is a company focused on the well-being of its customers, employees and owners. This requires a proactive approach to workplace health and safety policy (WHS)

Building and maintaining a distinct WHS culture

We are committed to conduct safe operations in all parts of our business, considering the health of all personnel involved, environmental responsibility and continuous improvement to ensure a high level of quality.

Cegal is committed to delivering quality in all aspects of our operation. Our HR and people processes are documented in our Cegal Management System.

All personnel in leadership positions play an important role regarding the communication and implementation of, and ensuring compliance with, WHS policies and standards.

The Cegal Quality Management System is complying with the international standard specified in NS-EN ISO-45001:2015 Occupation Health & Safety management system.



Cont. workplace health and safety management

Strong culture

- Cegal is a value-driven organization. We strongly believe in our company values; Inclusive, Super Skilled, Fuss Fighter
- Our values set the priorities for everything we do. Employees shall be seen, heard, and appreciated.
- A high percentage of our staff are shareholders in Cegal, and we regularly offer purchase opportunities..
- Regular employee engagement survey. Puts employee satisfaction on the agenda. Ensures high performance and enables the organization to take preventive and corrective actions.

Leadership capabilities

- The leadership role is a key enabler for company culture.
- Through our leader's promise, we create value and make each other better
- Fighting fuss and creating clarity
- Generating energy in the organization
- Winning and losing as a team
- Growing ourselves and others
- Delivering results

Competent and agile staff

- A global Career framework to support career discussions, development measures, and succession plans
- Onboarding programs for new leaders and staff
- Annual Growth dialogue; performance and development reviews
- On-demand and on-the-job learning. Global Learning Management system interfaced with state-of-the-art learning providers (e.g. LinkedIn Learning).
- Dedicated resources and staff to support learning
- Cegal test center. Internal support and guidance to complete IT certifications. A certification demonstrates our staff's dedication, motivation, and technical knowledge on specific platforms.
- Trainee programs and apprentice programs
- Mentor program

Cont. workplace health and safety management

HSEQ Forum

HSEQ Forum is the decision maker for the Management System. The forum is owned by Group CEO, and Director of HSEQ facilitates and leads the meetings.

All L1 Managers and some other selected roles are members of HSEQ Forum.

HSEQ Forum evaluates the structure and performance of the organization and Management System on bi-monthly basis (or more often if needed). The forum also follow-up decisions and measures to ensure that these have the effect that was intended.

Management Review

Once a year, HSEQ Forum and selected guest are conducting Management Review of our Management System. This review is a comprehensive analysis of our Management System to ensure that we develop and comply to the best possible management system that fit the purpose.

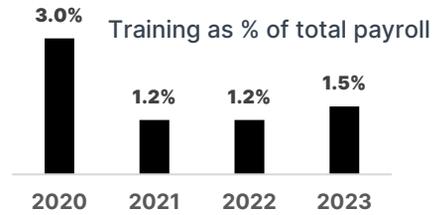
Environmental, Social and Governance (ESG) Committee

The ESG Committee is implemented similar to WHS Committee. The purpose with WHS Committee is to support the organization to comply with the Management System regarding ESG. ESG Committee also conduct risk management and follow-up nonconformity treatment to ensure our performance standards.



Own workforce

Training



Continuously provide practice and training, and review policies and practices to retain a high level WHS skill set in our organization. Cegal follow the requirements set forth in the Working Environment Act § 2-3 and §3-2. This applies for Norway, but also the global organization. In relation to Health, safety and environment issues, this includes training for leaders, as well as for staff members and safety delegates.

Some selected learning content

- HSE for safety delegates (40hrs). Content is regulated by the Working Environment Act in Norway. Applicable for Safety delegates and/or other members for the Working Environment Committee.
- HSE for leaders. Applicable for the CEO role.
- Cegal Awareness Course. The Cegal Awareness Course consists of an introduction to our Management System (CMS) and various company-wide policies everyone should be aware of. The training is part of onboarding of new staff and as annual refresher for all. Part of the Performance and control related to the ISAE3402 std.
- Cegal People Processes. Introduction to Cegal processes inclusive HSE responsibility for new line managers
- Phishing Campaigns. Phishing campaigns are completed regularly. Based on results/findings, targeted awareness campaigns are conducted towards groups and individuals. Part of the Performance and control related to the ISAE3402 std.
- Onboarding program for new leaders; My Leadership

Learning Management and documentation

Most training is managed in our global Learning Management System, SuccessFactors, ensuring automatic role assignments, refresher follow-up and compliance to GDPR regulations.

Completed training is logged in the individual's Learning history and in CV Partner.





Own workforce

Mentoring program Ignite 2023

Ignite Mentoring Program completed in 2023.

The program is designed to make sure we use the common skills and experience to spark engagement and curiosity.

The objectives of the program have been:

- Gain professional and personal insight.
- Get challenged by another person to grow and develop.
- Enhance your own skills in self-reflection and self-leadership.

We have had 45 personal feedback sessions with Enneagram, 5 plenary/Teams sessions, and lots of individual 1:1 meetings exploring self-awareness and growth.

The top four outcomes in terms of increased awareness are reported to be:

1. Self-awareness > 70%
2. Connectivity to others > 60%
3. Mindset (Growth) > 55%
4. Self-leadership > 50%

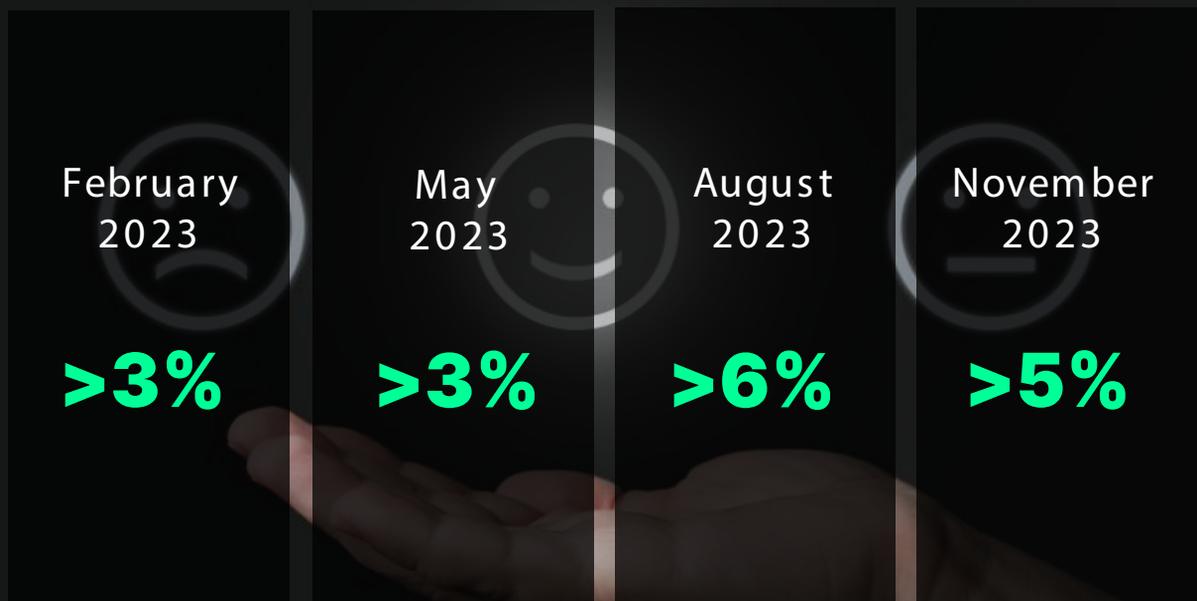
All in all, this is a very good match with the program's objectives. On the question of whether we reached our objectives, on a scale from 1-5, 96% reported 3 or above, 71% rated between 4 - 5. All in all, very satisfying.

Own workforce

Engagement survey

Well-being and satisfaction are tracked through a regular survey that monitors work tasks, culture, workload, etc. Based on results, leaders in collaboration with staff set actions for improvement and follow-up on progress.

This is measured in Scorecards to PE and Managers and reported regularly.



Target > 3% market average



Own workforce

Diversity, equity, inclusion, and belonging (DEIB)

DEIB is an inherent part of our Sustainability strategy and is organized in the section of social responsibility.

Our track record for working with diversity is good in terms of gender equality in a binary definition of gender identity - male and female is good. Even if the gender balance is not where we want it to be, we see improvements. However, from an intersectional perspective, this is an important part of the bigger picture. To address a broader set of target groups for diversity through an intersectional approach, other minorities are to be included in this work with the overall objective of creating an authentic sense of belonging.

An initiative grew from the organization to create an advisory board for diversity, Diversity at Cegal. The initiative has management support and was an area of focus and priority for 2023, along with work to build a presence beyond Norway, and will work towards a common understanding that all members of the Cegal organization are responsible for contributing to equity.

To broaden the perspective and increase knowledge on other underrepresented groups Diversity at Cegal ran a campaign during June with a total of eight knowledge articles on different gender identities and sexual orientations, and on topics related to intersectionality and how to work with inclusion. Two of them were also published on Cegal's website and social media.

During the year inclusive language and gender-neutral pronouns have been included in the Tone of Voice and language style guide.

Own workforce

Diversity in recruiting

Cegal is committed to improving gender balance by focusing on two main areas: attracting more female applicants and ensuring fair assessment and engagement during the recruitment process.

To attract more female applicants, we are conscious of our employer branding, carefully considering the images, language, and job requirements in its advertising to appeal to women. They highlight company benefits that resonate with female job seekers and leverage a snowball effect where hiring more women makes the company increasingly attractive to prospective female employees.

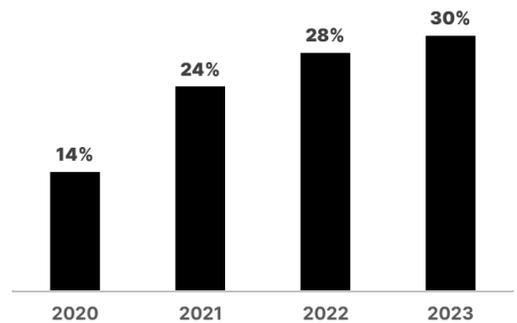
In assessing and interviewing candidates, we coach hiring managers on unconscious bias and, when in doubt, give female candidates a chance to demonstrate their potential. We include female interviewers to gain diverse perspectives, although the ultimate hiring decision is based on merit. Hiring managers are also expected to interview female candidates who do not necessarily meet the criteria of the position at hand and evaluate if the candidate might still be relevant for other positions in Cegal as such.

To inspire and educate potential female candidates about careers in IT and technology, we use our recruitment and branding strategies to create long-term interest among young women.

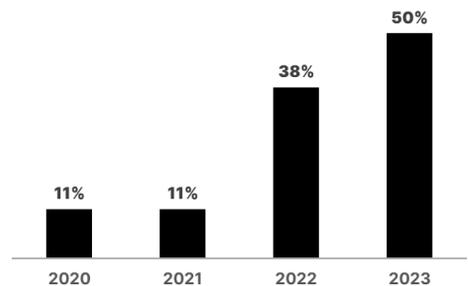
There are monthly KPIs and measures to ensure focus and updated status.

The goal is >40% females and <37 years in average age in new recruiting, this is reflected in Scorecards to People Experience and Managers.

Women new hire



Women in management group



Own workforce

Women at Cegal

Women at Cegal is an internal network focusing on gender equality and the visibility of women in our company. The network creates a platform for inspiration and motivation for our current and future female employees. Cegal is a Platinum partner in [ODA-network](#), the leading network for women in tech in the Nordic countries.

Goals:

- Contribute to reaching more than 30% of women working in Cegal by 2025
- Contribute to the hiring of more female job seekers in the recruitment and hiring process
- Host one ODA networking event every year through our Platinum partnership with ODA
- Arrange physical gatherings for all women in the company
- Contribute to Cegal's student engagement activities
- Celebrate International Women's day
- Participating with Tech Mentors at Girl Tech Fest and TENK tech camps



Vision

Women at Cegal want to contribute to the company's goal and strategy of becoming a NextGen company by retaining and increasing female diversity amongst employees.

Mission

Women at Cegal strives to be a network for professional growth and positive culture building for all women in the company.

Board:

The Women at Cegal board is committed to the above mandate. Moving forward we have included specific roles in the board to ensure we can deliver on our set goals and offer a great network to our female employees.



Supplier's working conditions

Workers in the value chain have the right to fundamental human rights and decent working conditions. This includes fair wages, safe working conditions, the right to form and join trade unions, and protection against discrimination and harassment. It is the responsibility of all Cegal ensure that these rights are respected and upheld.

The Norwegian Transparency Act establishes requirements for enterprises to carry out due diligence of fundamental human rights and decent working conditions within their enterprise, in their supply chain, and with their business partners; and to report on the due diligence activities they have carried out.

The objective of the Norwegian Transparency Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure public access to information regarding how enterprises address adverse impacts and fundamental human rights and decent working conditions.

Our Code of conduct and ethical guideline policy commits us to respect human rights and is publicly available and known internally.

In the transparency report we document our external due diligence assessment to assess whether our suppliers and other business partners respect human rights.

Cegal AS including all subsidiaries are subject to the Norwegian Transparency Act.

The full Transparency report is found in the Appendix.



Affected communities

Every year we arrange social engagement campaigns where we work voluntarily.

Humanity at Cegal

Humanity at Cegal was established in 2015 and is a voluntary effort to support humans around the globe and to drive social engagement and passion for Cegal employees. By combining our global footprint and digital competency we support projects in several parts of the world. Humanity at Cegal is committed to sponsoring and driving humanitarian causes, so-called Goosebump projects;

Save the Children partnership

We have entered a long-term partnership with the organization Save the Children. Cegal will be a key contributor to Save the Children's global EdTech project, where we are contributing with funding, but more importantly also providing pro bono services, leveraging our technology know-how in a long-term partnership.

Save the Children's EdTech project is for children to learn through tablets and physical tasks. This project is focused on educational technology, to enable children's participation as an important principle.

The Goosebump project is led by Humanity at Cegal and is focused on the UN Sustainable Development Goal 4, Quality Education. Cegal contributed to Save the Children as part of our EdTech partnership by:

Improving Learning Environments Together in Emergencies (ILET): The Goosebump project focus in 2023 was the ILET project. Save the Children encountered technical issues with their ILET application, which aims to help teachers and other community members adjust the teaching for children when emergencies occur. As a result of the technical issues, the tool couldn't be used properly.

The technical issues have been solved successfully by Cegal and the application is now working and ready to be used in emergencies. As an example, ILET can measure and report if children aren't able to attend school due to recent flooding in the area. This data allows teachers and community members to take swift action.

Advisory on cybersecurity: Cegal's cybersecurity advisory has been well received by Save the Children Norway and presented to Save the Children (STC) International. As a result, the advice given will be implemented by other STC member states.



We are a responsible player

We, as a responsible actor, take responsibility beyond ourselves to contribute to the global sustainability agenda.

We do this by setting requirements for our suppliers and partners that set expectations for stakeholders in the value chain. At the same time, we seek to work in partnership with others and collaborate in the supply chain to achieve sustainable development.

We are an open and transparent company that has strict and clear anti-corruption routines and a massive focus on IT security in everything we do with associated routines and procedures.

We have created the Cegal Management System to ensure a common framework and best practices for our actions. This system ensures that we work according to the highest standards for health, safety, security, environment, and quality for our employees, customers, contractors, and vendors.

We are committed to:

- Aligning our business with all regulatory requirements.
- Providing a work environment that protects our employees and other personnel involved in our operations, onshore and offshore.
- Ensuring a sustainable and environmentally friendly business where Cegal is a trustworthy business partner, employer and member of society.



Data security and privacy

Ensuring data security and privacy is at the core of all of Cegal's decision-making processes and policies.

Our information security management system is certified in accordance with the ISO 27001 certification. All policies and procedures on data management are in line with both the ISO 27001 and GDPR guidelines. Data management is controlled through the ISAE 3402 report that addresses the controls Cegal has in place.

Over the past few years, Cegal has had no severe security breaches or hacking incidents. 96% of employees received training on information and security practices in 2023. All new employees are expected to undertake information and security training.

Roles and responsibilities related to data management are formalized; a Data Protection Officer is appointed and works to protect an individual's personal data in accordance with GDPR guidelines

The goal of Information Security management is to protect the integrity and confidentiality of information assets. Cegal's deliveries are designed to be available and secure. Business continuity risks are reduced by proactively handling threats and vulnerabilities.

The ISO 27001 certificate demonstrates that Cegal has a robust security framework in place and is constantly working to protect all information for our customers.



Cont. Business conduct

Company culture

Governance includes aspects of good corporate governance and business integrity.

Cegal has implemented an anti-corruption policy and a whistleblowing policy to which all employees must adhere to. The Company shall ensure proper recording, reporting, and review of financial and tax information.

Related CMS documents:

- Code of Conduct and Ethical Guidelines Policy
- Anti-Corruption Policy
- Whistle-blowing Policy
- Inside Information Policy
- Intellectual Property Policy
- Anti-Slavery and Human Trafficking - Policy Statement (UKA)

Openness and transparency

As a responsible player, clear governance with control routines to ensure compliance with transparency management throughout the entire organization is defined as a key improvement project.

The project aims to include the full supply chain, and it covers core ethical areas:

- Human Rights
- Decent Working Conditions
- Environmental
- Anti-Corruption

We believe we can contribute to a positive difference by working systematically with these factors. To comply with relevant transparency laws and other stakeholder requirements, Cegal published the Transparency Act - Due Diligence Report on cegal.com in May 2023.

This report is a result of a series of measures taken:

- Understanding the legal requirements relevant to our jurisdictions
- Establishing a due diligence process to identify, prevent, and mitigate risks in our operations and supply chain
- Engaging with suppliers, employees, and legal advisors to understand their perspectives and concerns
- Conducting regular risk assessments to identify areas of potential non-compliance or risk in our supply chain and business operations
- Implementing a system for collecting and managing data relevant to the due diligence process
- Monitoring and auditing our supply chain and internal processes
- Revising governing documents and training materials



Cont. Business conduct

Whistleblowing

We encourage an open dialogue where employees are comfortable to ask questions, seek guidance, and raise concerns.

All Employees have the right to report any criticizable conditions that occur at the workplace to the Company.

This year we launched a new channel for whistleblowing. The audit firm BDO has been selected to operate this on behalf of Cegal, ensuring data protection, information security and adherence to global, regional, and local legislation.

Our whistleblowing channel enables all employees, customers, suppliers, and stakeholders of our organization to report any serious concerns or offenses in a confidential manner.

Whistleblower reports shall be managed in accordance with our established whistleblower process.

Any reported concerns shall be investigated for root-cause, corrective and preventive actions to be evaluated, including potentially involving relevant authorities, while preserving reporter confidentiality in accordance with relevant jurisdiction.

Ethical standard

We are determined to create a good reputation for our standards concerning business ethics. Ethics will always be an integral part of our business, and we expect high ethical standards from everyone who acts on our behalf. This includes our business partners.

Our Code of Conduct and Ethical Policy describes the ethical requirements for Cegal’s business activities.

Sustainability policies certificated and targets

Relevant ESG-related policies are in place (ESG, H&S, Code of Conduct, Anti-bribery, Whistleblowing, Diversity, Gifts, Purchasing).

Ensuring supplier compliance

A Supplier Code of Conduct and Procurement Provider Policy are in place.

Bribery and corruption

Cegal and its employees must always exhibit honesty, integrity, fairness, and respect in its business dealings.

Information obtained through the Company’s business must be used in the best interest of the Company and not for personal gain by any of its employees.

All Employees shall work against corruption, money laundering, and fraud in all its forms. Corruption is unacceptable business conduct, constitutes a threat to fair competition, and undermines legitimate business activities. Any violation within our organization may subject both the Company and individuals to criminal liability and would represent a risk to our reputation.

Related CMS documents:

- Code of Conduct and Ethical Guidelines Policy
- Anti-Corruption Policy

Cont. Business conduct

How we manage our value chain

Cegal is taking responsibility for human rights impacts across our value chains.

We set requirements for our suppliers and partners that set clear expectations for stakeholders in the value chain.

These are areas where we are constantly taking new steps and which we will continuously work to fulfill and improve.

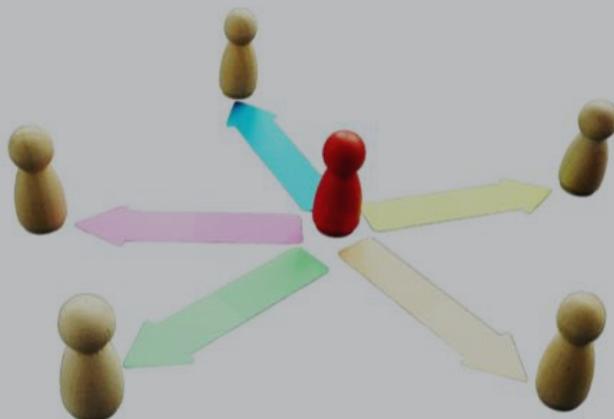
We expect our business partners and suppliers to adhere to our Supplier Code of Conduct. Suppliers are expected to meet these requirements throughout their relationship with Cegal.

Our subcontractors shall comply with our management system on an equal level with our own employees.

Procurement processes and controls ensure that Suppliers and Contractors are followed up and evaluated in accordance with contractual requirements for:

1. Business criticality
2. Information security
3. Work environment
4. Human rights
5. External environmental impact
6. Social responsibility (how people are treated)

Annual audits are carried out by selected subcontractors to check that terms and conditions are complied with.





Cont. Business conduct

Board of Directors

In December 2023 the Norwegian Government sanctioned legislation related to gender balance in boards for Norwegian companies.

As pr 1.1.2024 companies with revenue exceeding 100 MNOK are to have 40% representation of each gender in their boards.

For Cegal as such this applies to Cegal AS, and our ambition is to also ensure this in the board of the parent company Cegal Group AS. As of now, there are no female board members in either of these companies.

The plan is to ensure that we are compliant with this legislation as soon as possible, and no later than the end of 2024.



Reporting parameters

Legal name	Cegal AS
Org. nr	996 221 423
NACE sector code	J62.02 - Computer programming, consultancy and related activities
Location of headquarter	Vestre Svanholmen 4, 4313 Sandnes, Norway
Nature of ownership	Privately owned. Majority owned by Norvestor, a leading Private Equity Fund
Reporting period	1/1/2023-31/12/2023
Contact person	Dagfinn Ringås (CEO), dagfinn.ringas@cegal.com



About the report

This report is produced by Cegal Group AS. It describes the relevance of ESG in the industry in which Cegal operates. The report highlights the key material ESG themes and assesses performance on those themes. It is updated annually to monitor progress and keep the company focused on achieving the goals of becoming a more sustainable company over time.

The report is based on requirements in the Corporate Sustainability Reporting Directive (CSRD) and the Greenhouse Gas Protocol. Cegal will report on the CSRD legislation for the first time in 2026. To align with the EU Sustainability Reporting Standards (ESRS), the sustainability calculations are conducted according to the relevant requirements.

Energy and greenhouse gas calculations are backed by analyses conducted by the Position Green tool with support from Position Green advisory. This Position Green calculation is performed according to the Greenhouse Gas Protocol. Other data are calculated based on requirements in the CSRD and ESRS.

The report is approved by the board and management of Cegal.

APPENDICES

Appendix 1

Transparency report

Appendix 2

Gender equality report

Cegal AS

Transparency Act

Due Diligence Report 2024

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1 MANAGEMENT ASSERTION

The accompanying description has been prepared according to the requirements in the Norwegian transparency act.

The due diligence has been carried out in accordance with the OECD Guidelines for Multinational Enterprises limited to human rights and decent working conditions.

The report is available on the Cegal website - [Cegal.com](https://www.cegal.com)

Cegal AS confirms that:

The accompanying description fairly presents the description of how Cegal promotes respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and how we address adverse impacts on fundamental human rights and decent working conditions.

Sandnes, April 19, 2024

Dagfinn Ringås
CEO, Cegal Group AS

Trym Gudmundsen
Chairman of the Board

Svein Torgersen
Board member

Frank Garneng
Board member

2 DESCRIPTION OF CEGAL

A global tech powerhouse, specializing in energy.

Cegal has a unique and proven competence in the key three areas of industry knowledge, technical know-how, and scalable delivery. And with this, we shape the digital future by turning complex IT into digital success stories. Our vision is to build a stellar nextgen tech company that enables a more sustainable future.

With 950 + employees in ten countries, Cegal is growing to become a leading global technology powerhouse for the energy industry and a contributor to the green transition.

Cegal's headquarters is located in Stavanger Norway with offices in Norway, Sweden, Denmark, the United Kingdom, the United States, United Arab Emirates, Malaysia, Estonia, and Australia.

In Cegal you are seen, heard, and appreciated, no matter your position, beliefs, ethnicity, or orientation. You influence decision-making, your career, and your work-life balance. We are black belts in technology and experts in energy. That is how we innovate and drive business value for our customers. We are passionate problem solvers who give and get energy from solving complex problems for each other and our customers.

Cegal has a complete and complementary offering across leading industry software, world-class consultancy, and mission-critical cloud solutions. Our deliveries are designed and operated with information security in mind. Well-defined processes and controls ensure that any security issue is identified and managed according to the requirements laid down in the customer agreements.

More info on www.cegal.com.

3 INTRODUCTION

The objective of the Norwegian Transparency Act (Åpenhetsloven) is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure public access to information regarding how enterprises address adverse impacts and fundamental human rights and decent working conditions.

The Norwegian Transparency Act establishes requirements for enterprises to carry out due diligence of fundamental human rights and decent working conditions within their enterprise, in their supply chain, and with their business partners; and to report on the due diligence activities they have carried out.

Cegal AS including all subsidiaries will be subject to the Norwegian Transparency Act.

What we do:

Human Rights

- Our Code of conduct and ethical guidelines policy commits us to respect human rights and is publicly available and known internally.
- We have documented an internal due diligence assessment to map the risk of whether our operations, products, and services cause or contribute to human rights violations.
- We have documented an external due diligence assessment to assess whether our suppliers and other business partners respect human rights.
- We have categorized the human rights risks (high, medium, and low) so we can implement relevant measures.
- If we uncover a risk for human rights violations, we implement documented risk-reducing actions.
- If we discover that we have caused or contributed to human rights violations, we take measures to remedy the damage.
- We report publicly and regularly on how we work with human rights issues.
- We have implemented clauses in our supplier contracts to ensure possibilities to verify or audit human rights aspects of the business and the supply chain.
- We seek to influence and encourage our supply chain to follow the same principles as above for Human rights.

Decent Working Conditions

- We ensure written and signed employment contracts for all employees, also in their native language.
- All our workers are free to join trade unions or organizations of their choice and can negotiate collectively if the law permits them.
- Our management participates in collective negotiations in regard to working conditions and wages.
- We frequently share information about the business and have constructive collaboration with our employees.
- We have documented measures to ensure that we neither cause/nor contribute to child labor, forced labor, and/or discrimination.
- We provide employees with training and work continuously to ensure good results in terms of health and safety at the workplace and keep records to ensure the training is

documented.

- We offer salary and compensation that are in accordance with industry standards.
- We have a process and anonymous system for whistle-blowing for employees to report misconduct linked to working conditions without the risk of reprisal.
- We seek to influence and encourage our supply chain to follow the same principles as above for decent working conditions.

Certifications

- ISO 9001 Quality Management System
- ISO 14001 Environmental Management System
- ISO 27001 Information Security Management System
- ISO 45001 Occupational Health and Safety Management System

Responsible business code of conduct embedded in Cegal management system.

- Code of Conduct and Ethical Guidelines Policy
- Environmental, Social and Governance (ESG) Policy
- Workplace health and safety policy (WHS)
- Anti-corruption policy
- Procurement policy
- Supplier - Standard terms and conditions - ESG supplier requirements
- Annual Sustainability report

4 DUE DILIGENCE SELF-ASSESSMENT

Methodology

The due diligence is conducted regularly and is risk-based, proportionate, and in accordance with the UN's Guiding Principles for Business and Human Rights and the OECD Guidance for Multinational Enterprises.

We acknowledge that human rights due diligence is a continuous process, and we are constantly working to better understand and map the risks to fully integrate and implement the required improvements.

Sources and score for assessments

Topic	Source	Description	Measurement	Limit Value	Evaluation
Human Rights	Freedom House	Freedom House is a non-profit, majority U.S. government-funded organization in Washington, D.C., that conducts research and advocacy on democracy, political freedom, and human rights.	Measures political freedom and the freedom of the individual, including political diversity, freedom of expression, fair justice, and that there is no economic oppression	35	Countries with less than 35 points are considered as "Non-Freedom Countries". Countries above 35 points have partial or complete freedom.
Decent Working Conditions	International Trade Union Confederation	The International Trade Union Confederation (ITUC) is the global voice of the world's working people. The ITUC's primary mission is the promotion and defense of workers' rights and interests, through international cooperation between trade unions, global campaigning, and advocacy within the major global institutions.	Summarizes data from trade unions internationally about being an employee in the individual country. Measures, among other things, the right to establish and join trade unions, the right to collective bargaining, and the right to strike.	5	Countries are assessed as red, yellow, orange, or green. Red and dark (>5) red are not accepted.
Environmental	Environmental Performance Index (EPI)	The 2022 Environmental Performance Index (EPI) provides a data-driven summary of the state of sustainability around the world. Using 40 performance indicators across 11 issue categories, the EPI ranks 180 countries on climate change performance, environmental health, and ecosystem vitality.	Measures the environmental performance of a country's policies. Environmental health (40%): Pollution in air, water, and pollution from heavy metals. Ecosystem (60%): Biodiversity, deforestation, fisheries, sewage management, greenhouse gas emissions, and emissions of nitrogen from agriculture.	50	The points scale is ranked from red to green per country. Red is ranked from 0 to 50.

Anti-Corruption	Transparency International	Transparency International is the global civil society organization leading the fight against corruption. It brings people together in a powerful worldwide coalition to end the devastating impact of corruption on men, women, and children around the world.	Measures the degree of corruption in the public sector based on 12 expert assessments from various institutions and 16 different polls	50	Countries with scores below 50 are perceived as more corrupt.
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If the Company identifies that it has caused or contributed to actual adverse impacts, the Company should address such impacts by providing for remediation.

The type of remedy or combination of remedies that is appropriate will depend on the nature and extent of the adverse impact.

Result of assessment 2024

Sustainable Business Practices and Ethical Trading

2024 Due Diligence overview	
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5 SUPPLIER DUE DILIGENCE

High-level risk assessment

We perform regularly high-level assessments on the risk of human rights violations in the supply chain of the industry in which we operate.

The suppliers have been subject to a risk assessment, including human rights and labor conditions risks, and have been categorized into three categories: low, medium, and high risk.

Based on the identified risk level, the suppliers are subject to targeted onboarding and follow-up measures.

The due diligence comprises the Company's suppliers (and their sub-suppliers) and other business partners that supply goods or services directly to the Company.

Direct purchases from suppliers that entail an inherent risk of human rights and labor abuses require a more proactive and cautious approach from the Company in terms of background checks and follow-up measures, such as audits.

Our primary suppliers deliver hardware, software as a service, and facilities (offices and data centers).

Suppliers in high-risk countries - Detailed assessment

Based on the high-level risk assessment Cegal has identified three vendors that operate in high-risk countries.

The following assessment has been performed:

Vendor, located in India has been identified as a software vendor, used in development of Company products. Companies in software development do not have any known relation to the risk of breaches of human rights or environmental impact. Regular assessments in the company regarding breaches have not been identified.

Vendor located in Mexico, with headquarters in Argentina, has been identified as a software vendor, used in deployment of Company products. Companies in software development do not have any known relation to the risk of breaches of human rights or environmental impact. Regular assessments in the company regarding breaches have not been identified.

Vendor located in Egypt has been identified as a software and hardware reseller, used by the Company for maintenance agreement of installed hardware located in Egypt. Hardware vendor is consulted and has recommended the selected Vendor in Egypt as the preferred partner in the region. Companies in Information and Communication industry do not have any known relation to the risk of breaches of human rights or environmental impact. Regular assessments in the company regarding breaches have not been identified.

6 INTERNAL OPERATIONS DUE DILIGENCE

General workplace health and safety

All offices perform an annual office risk assessment regarding workplace health and safety and the environment.

Cegal has also implemented global processes for whistle-blowing and reporting on deviations and incidents related to Workplace Health and safety (WHS).

Sick leave in the Group was 3.09% in 2023 compared to 2.8% in 2022. During the year, no serious workplace accidents, which resulted in significant damage or injuries have not occurred or been reported.

The working environment is good, and improvements are being continuously evaluated and implemented. At the end of 2023, the Group consisted of a total of 796 employees compared to 769 in 2022, including 172 (160 in 2022) women and 625 (609 in 2022) men.

The goal is to be a workplace where there is full gender equality. The Board and management are aware of the societal expectations on measures to promote gender. Discrimination The Anti-Discrimination Act is to promote equality, ensure equal opportunities and rights and prevent discrimination based on ethnicity, national origin, ancestry, color, language, religion, and belief.

The Group works actively, purposefully, and systematically to promote the purpose within our business. The activities include recruitment, pay and working conditions, promotion, development, and protection against harassment.

The Group aims to be a workplace without discrimination on grounds of disability. The Group works actively and purposefully to design and facilitate the physical conditions so that the different functions can be used by as many people as possible. For employees or applicants with disabilities, individual arrangements are made with regard to workplaces and work tasks.

All of Cegal's offices work in accordance with ISO 45001:2015 Occupation Health and Safety management system.

Implemented action on offices in high-risk countries

Two of our offices is placed in high-risk countries. Cegal high standards on fundamental human rights and decent working conditions apply to all employees, and Management performs the same management training that is based on Nordic welfare principles.

The offices are regularly reviewed during the ISO 45001 audit, and the risk of any breach of fundamental human rights and decent working is regarded as low.

7 CONTINUAL MONITORING AND IMPROVEMENT

Implement suitable measures to cease, prevent, or mitigate adverse impacts based on the Company's priorities and assessments.

The Company has instigated several preventive and mitigating measures based on the risk assessment.

1. Background checks of medium and high-risk suppliers with subsequent follow-up actions and dialogue with suppliers
2. Supplier Standard Terms and Conditions have been updated to include relevant Human rights requirements.
The T&C will be included in all new contracts, and contain adequate compliance clauses, including the Company's expectations of suppliers' working conditions and compliance program, the duty to inform of breaches, and the Company's right to conduct audits. The obligation of suppliers to comply with the Company's [Supplier] Code of Conduct, including focus on the suppliers' management system as a pre-requisite to implement the requirements of the Company's [Supplier] Code of Conduct.
3. Perform regular audits of the supply chain.
4. Track the implementation and results of measures.

For high-risk suppliers that entail an inherent risk of violating human rights, the Company shall closely monitor any identified concerns and track the outcome of the implemented measures above, and on an ongoing basis assess the need to adopt additional measures.

The Company shall ensure that risk-relevant information about high-risk suppliers is shared within the Company's organization, as this will ensure that risk assessments take all relevant facts and observations into consideration.

Information regarding suppliers from a risk management perspective may be exchanged with the Company's peers to the extent appropriate.

In cases of suspected human rights violations, the Company shall consider consulting with local authorities, local communities, and relevant NGOs.

Gender equality

Report 2024

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1 INTRODUCTION

This report has been written in line with the provisions of the Norwegian act on Equality and Anti-Discrimination §26 (Likestillings- og diskrimineringsloven).

The report consists of two parts: One part stating the state of gender equality in the company and a part two elaborating on Cegal' s work for equality and against discrimination.

2 STATE OF GENDER EQUALITY

2.1 GENDER BALANCE 2023

Table 2.1. No Title

Gender balance numbers		Temporary Staff Percentage of all employees		Parental leave Average number of weeks		Actual part time Percentage of all employees		Involuntary part-time Percentage of all employees	
Female	Male	Female	Male	Female	Male	Female	Male	Female	Male
183	695	1,9	9,3	23	16	2	3,2	0	0

2.2 WAGE DIFFERENCES 2023

In 2022 the difference between men and women was 3%, we can now report that that difference is the same for 2023, 3% for the total population in Norway.

Per job level the difference is the following:

Table 2.2. No Title

	Gender distribution at different job levels, 2023		Wage differences (Women's share of men's wages is stated as a percentage)	
	Female	Male	Compensation	Benefits ⁴⁾
			Sum Compensation	Sum taxable benefits ⁴⁾
Total ¹⁾				
Level 1 ³⁾	7	20	2,84%	
Level 2 ²⁾	32	80	0,68%	
Level 3 ²⁾	38	125	2,76%	
Level 4 ²⁾	37	102	0,34%	
Level 5 ²⁾	20	61	-4,55%	
Level 6-8 ³⁾	N/A	N/A		

Notes to the table above:

1. Staff in Norway
2. Cegal uses Career Framework job levels to compare across the organisation. The Career Framework is implemented to ensure transparency and equality across the organisation in most people aspects.
3. Too few employees in Level 6-8 to report difference in salary
4. As the benefits for women and men are the same, the ratio is 100%

3 CEGAL' S WORK FOR EQUALITY AND AGAINST DISCRIMINATION

3.1 POLICY, PROCEDURES AND STANDARDS FOR EQUALITY AND AGAINST DISCRIMINATION

Cegal has establish governing policies, procedures and standards that shall promote equality and diversity in all aspects of our business, including resourcing, reward, development, and management. This is continuously worked on through management anchoring, company strategy and goals (KPI's), awareness programs and is governed by our Company Management System (CMS) including (but not exhaustive):

1. Code of Conduct and Ethical Guidelines Policy
2. Whistleblowing Policy
3. Environmental, Social Governance Policy
4. Workplace health and safety (WHS) Policy
5. Competence Management Policy
6. Global Salary and bonus Policy
7. Global Career Framework
8. Stakeholder requirements and risk assessments
9. Company values and Leader Promise (leader principles)

3.2 TRAINING & AWARENESS

It is pivotal that staff have an awareness and knowledge of Cegal' s governing documents, as well as being kept up to date should these documents change.

As part of our onboarding and quality processes all staff and managers are introduced to our management system and a selection of global policies. This also include a mandatory annual refresher training. Training is also provided on processes for reporting and follow-up on deviations and non-conformities.

Internal audits are run regularly to check compliance and to ensure continuous improvement.

3.3 HOW WE WORK TO ENSURE EQUALITY AND NON-DISCRIMINATION IN PRACTICE

According to section 26, second paragraph in the Equality and Anti-Discrimination Act the work to promote equality and prevent discrimination shall follow a four-step working model and encompass six HR areas (recruitment, pay and working conditions, promotions, development opportunities, accommodation and the opportunity to combine work with family life) and several grounds of discrimination including gender, pregnancy, leave in connection with childbirth or adoption, care responsibilities, ethnicity, religion, belief, disability, sexual orientation, gender identity, gender expression or combinations of these grounds.

Internally, we have applied this four-step working model:

1. Investigate whether there is a risk of discrimination or other obstacles to equality,

including every (requirement: every other) year surveying pay conditions broken down by gender and the use of involuntary part-time work.

2. Analyse the causes of identified risks.
3. Implement/prioritise measures that are suitable to counteract discrimination and contribute to increased equality and diversity in the business.
4. Assess the results of the work according to points 1-3.

The risk assessment process follows our internal procedures. The identification of risks, impact areas, actions and evaluation are being work on at department level, but also in cross company and multidisciplinary committees like the Working Environment Committee, HSE Forum and Sustainability Committee.

3.4 IDENTIFIED RISKS/KEY AREAS

Main risk/key areas relevant for the provisions of the Norwegian act on Equality and Anti-Discrimination in our risk register (Reference: HR & WHS risk register)

#:

1. Breach of internal policies. Cegal is growing rapidly hence our priorities is to work towards one global Cegal implementing common mindsets and a minimum of global standards.
2. Breach in government rules. Cegal is present in several different regions and cultures globally. This requires us to be complaint to local legislation, as well as internal, regional, and global laws and regulations.
3. Preconceived attitudes/unconscious biases and/or physical conditions in the offices prevent or block the recruitment/promotion of personnel with disabilities or belonging to a minority group in society. This included the potential of staff to become disabled during the life cycle in the Company.
4. Employee Engagement. Employee engagement is a barometer for well-being and feeling of belonging to the organization and a prerequisite for being able to implement our strategy and reach company goals.

3.5 OUR INITIATIVES/PRIORITIES

gender, pregnancy, leave in connection with childbirth or adoption, care responsibilities, ethnicity, religion, belief, disability, sexual orientation, gender identity, gender expression or combinations of these grounds.

Table 3.1. No Title

Risk#	HR area	Grounds for discrimination	Activity	Desired result/KPI	Status
1,2	Wages and working conditions	A combination of these grounds	Perform regular external salary benchmarking	Identify GAP both towards internal marked, but also internally	Implemented 2023
1,2		A combination of these grounds	Establish a global salary review process	Secure alignment and calibration across the organisation. Create transparency on budgets and priorities.	Implemented
1,2		A combination	Establish a global career framework	Secure transparency on job requirements	Implemented

		of these grounds		and internal standards for salary benchmarking and promotions	
1,2		Gender	Reporting on salary differences between genders	Regularly reports on salary differences between genders	Ongoing
1,2,3		A combination of these grounds	Create awareness through training and secure relevance of framework	Induction of new leaders in our internal people processes and a pro-active approach to support new needs in the organisation	Ongoing
1,2,3		A combination of these grounds	Code of conducts for suppliers	Requirements set to our suppliers. Regular audits performed by our HSEQ department	Ongoing
1,2,3		A combination of these grounds	Mapping of stakeholder requirements in all the locations Cegal has offices	Regularly mapping of minimum requirements in the local legislation to ensure compliance and updates	Ongoing
1,2,3	Promotions	A combination of these grounds	Established a global process for promotions	Ensure a fair and transparent process with the appropriate approval level	Implemented
1, 2, 3	Recruitment	A combination of these grounds	Establish structured interviews and valid and reliable psychometric testing tools	To secure as far as possible objective comparison and selection criteria	Implemented
3		Gender	Review of all text used in relation to job adds, etc. to better attract female candidates	Improve Cegal brand and attract female candidates	Ongoing
1,2,3		A combination of these grounds	Awareness training for recruitment managers	Create awareness and skills in Cegal' s recruitment processes and how we should work together to comply with external requirements and to reach our KPI's on gender and age	Ongoing
		Gender	A priority on search and recruitment of females and persons under the age of 37	A better balance between gender and age in the organization	Ongoing
		Gender	If a woman applies for a position we will invite her to the	To ensure a gender balance. In Cegal we hire for attitude, skills	Ongoing

			interview even if her CV is not a perfect match.	can be developed.	
		Gender	We nominate women for the ODA mentoring programs.	To develop and retain women in Cegal.	Ongoing
		Gender	If there is a female application we aim to ensure there is a woman from Cegal participating in the interview.	To ease the interview process for the candidate.	Starting in H2 2024
2	Development & training	A combination of these grounds	Growth Dialogue	A global process to ensure all staff are involved in discussion and goal setting on career and development	Implemented 2023
		A combination of these grounds	Promotion of unconscious bias awareness training	To create a higher awareness on how unconscious bias influence our decisions and priorities	Ongoing
1, 2, 3	Facilitation	Disability	Conduct an office assessment review	The purpose is to ensure that all our locations are compliant with requirement in ISO 45001 Workplace Health and Safety.	Implemented
3,4		Gender	Continuation of 'Women at Cegal'	A network in Cegal created for women to inspire and support each other	Ongoing
3,4		Gender	Continuation of partnership in the ODA network	Support and promote the IT industry and IT technology for women	Ongoing
1,2,3,4		A combination of these grounds	Established 'Diversity at Cegal'	A cross company and multidisciplinary volunteer group. Diversity at Cegal is working to promote and facilitate for diversity at all Cegal' s locations across the world. Discuss diversity and inclusion in Cegal. By diversity we define everything from gender and sexuality to neurodiversity, mental	Established in 2022, ongoing

				issues, and disabilities.	
2, 3, 4		A combination of these grounds	Sustainability Committee	A cross company and multidisciplinary volunteer group to work on sustainability (ESG) issues, including the United Nations Sustainable Development Goals,	Ongoing
2, 3, 4		Religion, Belief	Established dedicated space in the bigger offices for prayer, meditation, and similar	To Improve support and facilitation for a multi-ethnic/religious workforce	Established in 2022, ongoing
2,3, 4		Gender, Identity	Establishment of gender neutral toilets in new offices	To improve and support the facilitation of all gender identities.	Established in 2022, ongoing
4		A combination of these grounds	Regular employee engagement surveys and improvement actions	Proactively identify causes (potentially inequality and discrimination), for a drop in engagement score and define actions for improvement	Ongoing
2,3,4	Combination of work and family life	A combination of these grounds	Arrangement for being able to work from home	Enable a better flexibility to combine work and family life	Established and ongoing

3.6 OUR ASSESSMENT ON PROGRESS AND CONTINUOUS IMPROVEMENT ON DIVERSITY & EQUALITY

By continuing to focus on diversity in recruitment and embedded equality in established processes and policies, Cegal can work towards a more diverse and equal company.

Through our measurements and reports, we see that the measures and our increased awareness of diversity are producing results. However, we must continue to work with gender balance and equality across the whole organization.

4 REFERENCES

[Sustainability - Essential in our vision of becoming a legendary company.](#)

[Who we are - our mission, vision, and values.](#)