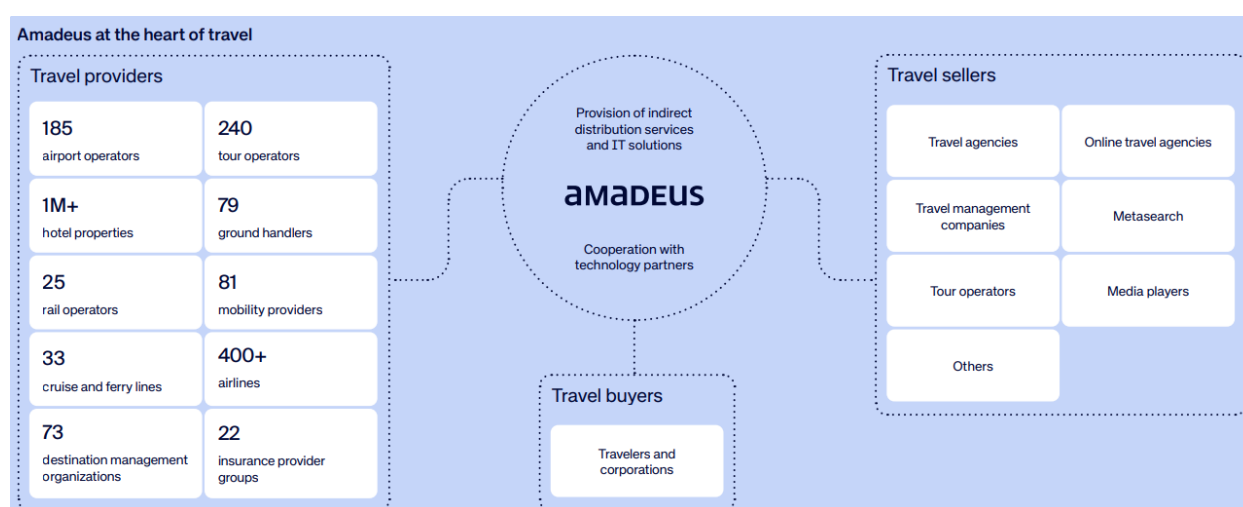


TRANSPARENCY ACT – AMADEUS NORWAY AS

1 General description of the Company

Amadeus Norway AS (“**Company**”) is a subsidiary of Amadeus Scandinavia AB, which is a subsidiary of Amadeus IT Group S.A. with headquarters in Madrid, Spain.

As part of the Amadeus Group, the Company provides software solutions for the global travel and tourism industry – which, for example, include developing software for airlines, hotels, and travel agencies. The purpose and goal of the solutions developed and provided by the Company is to enhance the business' operations and customer experiences.



The Company has adopted the Code of Ethics and Business Conduct (the “CEBC”) at Amadeus Group level. The CEBC is based on the following values: Customers First, Working Together, Taking Responsibility and Aiming for Excellence. The CEBC reflects who we are and how we conduct our business. Our guiding principle is integrity – the personal integrity of each and every member of the Amadeus community and our professional integrity as a business organization. Furthermore, the Amadeus Group has policies on anti-bribery, anti-corruption, anti-fraud and Speak-Up which have been adopted by the Company as part of the Amadeus Group. The Company is also part of the Group’s environmental sustainability strategy and continuous work on ESG (Environmental social and governance). Further information on the Amadeus Groups policies and continuous work in environmental sustainability and ESG can be found in the global report for 2023¹.

As part of the Amadeus Group, the Company are also subject to established requirements, routines and systems that shall be followed when choosing vendors. This for example include that relationships with vendors that do not comply with respect for human rights, prevention of forced and child labor, prevention of unfair low-wage labor etc. shall be avoided².

¹ Global Report 2023 (pages 152 – 160): <https://corporate.amadeus.com/documents/en/resources/corporate-information/corporate-documents/global-reports/2023/pdfs/amadeus-global-report-2023.pdf>

² Global Report 2023 (page 183): <https://corporate.amadeus.com/documents/en/resources/corporate-information/corporate-documents/global-reports/2023/pdfs/amadeus-global-report-2023.pdf>

In 2023 the Company had a sale revenue above 70 MNOK and balance sheet above 35 MNOK. This means that the Company is considered a "larger business", which is subject to the Act on Business Transparency and Work with Basic Human Rights and Decent Working Conditions (Transparency Act), cf. Section 3 first paragraph letter a).

With regard to the specific obligations that follows from the Transparency Act, responsible business conduct was embedded in a board meeting 28 June 2024, and the Company has together with the relevant representatives from the Group decided on how to work to fulfill the purpose and requirement of the Act. There has been established a Project Group which has i) carried out mapping of vendors / suppliers, ii) assessed actual and potential adverse impact on fundamental human rights and decent working conditions, and iii) assessed possible measures.

2 Due diligence and measures

2.1 Mapping of supply chain and business partners

Subject to Section 4 of the Transparency Act, the Company shall identify and assess the risk for actual and potential adverse impacts on fundamental human rights and decent working conditions they contribute to through the supply chain (sub-contractors) and / or business partners (vendors).

The Project Group has mapped the supply chain and business partners. The result from the mapping is that the only direct sub-contractor in the supply chain is the parent company, Amadeus IT Group S.A. Furthermore, the Company has a total of 23 business partners (vendors) the last year – mainly related to real estate, insurance and financial services.

2.2 Assessment of risk – adverse impact on human rights and working conditions

2.2.1 General assessment

Firstly, the Company has categorized the risk for adverse impact on fundamental human rights and working conditions based on where the subcontractor / vendor is localized (Region) and what goods and/or services the subcontractor / vendor delivers to the Company. This resulted in an overall "risk factor" which was categorized in low risk (green), medium risk (yellow) and high risk (red).

As all of the vendors that had been identified was localized in the Nordics, and as none of the vendors delivers services or goods that suggest a high risk, the initial and general assessment is that there is low risk for actual or potential adverse impact on fundamental human rights and decent working conditions. For the supply chain, the initial risk assessment was medium based on the region and type of services.

After this initial assessment (schematic approach), the Project Group made a more concrete and individual assessment where the risk factor for each subcontractor / vendor was assessed specifically and adjusted if necessary.

2.2.2 Individual assessment

For vendors that represented a volume of under 50.000 NOK in 2023, the assessment of the Project Group was that the volume is so limited that there was no need for an individual assessment. For the eight vendors that have a volume of above 50.000 NOK there was made an individual assessment.

There are a total of five vendors with a volume between 50.000 – 100.000 NOK – all of which is localized in Norway / Nordics and deliver services within insurance and finance (accounting). The risk for adverse impact on human rights and decent working conditions is assessed as low based on region / type of service. Furthermore, the Project Group has not identified other relevant factors that indicated or suggests an adjustment of the initial risk assessment. The risk for adverse impact for fundamental human rights and decent working conditions was therefore viewed as low.

Finally, there were three vendors with a volume above 100,000 NOK in 2023. The third largest vendor delivers hardware, which may represent some risk of adverse impact down the supply chain. This vendor is, however, subject to the Transparency Act and their report was available online^[1]. This is also the case for the second biggest vendor to the Company, Park Nordics AS^[2]. The Project Group has reviewed this information and concluded that there was no need to adjust the initial risk assessment that the risk for adverse impact was low.

The last and biggest vendor, EP Center Norway, is a company that rents out property. Rental of property generally implies low risk for adverse impact, except for services delivered in connection with rental – for example cleaning services and maintenance. These types of services industries (cleaning etc.) may represent risk of unfair wages or indecent working conditions. Furthermore, the Project Group notes that EP Center Norway, unlike the third and second biggest vendors to the Company, is not subject to the Transparency Act. Based on the aforementioned, and that EP Center Norway AS is by a clear margin is the largest vendor to the Company, the risk factor for EP Center Norway was adjusted to medium risk.

The Company has only one direct sub-contractor, which is their parent company, Amadeus IT Group S.A. The solutions and services provided by Amadeus IT Group mainly stems from other companies in the Amadeus Group – more precise from Amadeus Data Processing (Erding, Germany) and Amadeus SAS (Nice, France). The Project Group adjusted the initial risk from medium to low risk based on the routines and policies established in the Amadeus Group, which ensures the safeguard of fundamental human rights and decent working conditions within the Amadeus Group and when contracting vendors or subcontractors.

Summary:

- Low risk: 22 vendors
- Medium risk: 1 vendor
- High risk: 0 vendors

2.3 Assessment of measures

Based on the assessment above, The Company concluded that it would not be necessary or proportional to instigate any measures towards the 22 vendors that have been assessed to represent a low risk for adverse impact on human rights and decent working conditions. The same applies for the subcontractor (Amadeus IT Group S.A.) in the supply chain.

For the vendor where the risk has been viewed to be medium, the initial measure will be to get confirmation that the vendor upholds national legislation on fair wages and working conditions, and confirmation that the company complies with fundamental human rights. This will be initiated immediately. Based on the feedback from the vendor, The Company will review the risk and need for other measures.

As a more general measure, the Company will review and include compliance with fundamental human rights and decent working conditions to terms with vendors / business partners. The aforementioned measures will be followed up by the Project Group.

^[1] <https://www.dell.com/no-no/dt/corporate/social-impact/esg-resources/reports.htm#tab0=0>

^[2] <https://www.parknordic.no/apenhetsloven>