

## Statement of compliance with the Norwegian Transparency Act

---

### 1 Introduction

Descartes Systems Norway AS is committed to upholding the highest ethical standards in its operations, with a particular focus on respecting human rights and ensuring decent working conditions. This statement outlines Descartes Systems Norway AS's compliance with the Norwegian Transparency Act, which mandates corporate accountability for fundamental human rights and labor conditions throughout business operations and supply chains.

Our approach aligns with international frameworks such as the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. This document serves to detail our efforts in implementing due diligence, managing supply chain risks, and maintaining transparency. Annual updates to this statement will ensure continued accountability and responsiveness to emerging risks.

### 2 Key information about the business

#### 2.1 Name of the business

Descartes Systems Norway AS org nr. 952603779

#### 2.2 Products, services and market

Descartes Systems Norway AS provides advanced logistics, supply chain management, and compliance solutions, serving global clients across diverse industries. Our services are designed to enhance efficiency, reduce risk, and promote sustainable practices.

#### 2.3 Organization

The company operates under a well-structured governance framework under the parent company The Descartes System Group Inc. Oversight of compliance efforts is managed by a dedicated committee, supported by Legal and Human Resources Departments.

#### 2.4 Responsible for the due diligence at Descartes Systems Norway AS and this report:

HR Manager Anna Ekvall E-mail: [aekvall@descartes.com](mailto:aekvall@descartes.com)

### 3 Descartes System Norway's compliance framework for human rights and labour rights

Descartes Systems Norway AS embeds human rights and labor rights considerations into every aspect of its operations. The company's global policies—including the Descartes Global Code of Conduct and the Business Partner Code of Conduct—are designed to ensure compliance with international standards and the Norwegian Transparency Act. Key components of our framework include:

1. **Ethical Commitment:** A firm commitment to respect fundamental human rights and ensure decent working conditions across all operations.
2. **Training and Awareness:** Regular training sessions for employees, suppliers, and contractors to build awareness of human rights risks and compliance obligations.
3. **Whistleblowing Mechanism:** A confidential whistleblowing platform to report breaches of human rights or labor standards without fear of retaliation.
4. **Dedicated Contact Point:** A contact desk that handles inquiries related to human rights and labor risks, ensuring timely identification and resolution of issues.

Our compliance efforts are underpinned by robust policies and mechanisms, including:

- A comprehensive whistleblowing policy ensuring confidentiality and protection for reporters.
- Transparent reporting channels to address stakeholder concerns and provide updates on compliance progress.

### 4 Work related to the Transparency Act

Descartes System Norway AS has committed to implementing Supply Chain Due Diligence and pursuing Supply Chain Assessment.

Further, Descartes System Norway is commitment to comply with human rights and labour rights both within the company and the supply chain is embedded in our global policies, including the Descartes Global Code of Conduct and Descartes Business Partner Code of Conduct. Descartes employees, as well as suppliers and contractors, are also encouraged to speak-up in case of any suspicion of wrongdoing, including breaches of the above-mentioned policies.

To raise any concern, Descartes has provided a whistleblowing point of contact which allows employees and others to report breaches.

#### 4.2 Supply chain risk assessments, due diligence and mitigating measures

Descartes System Norway has mapped its suppliers and business partners, particularly in regions or industries with a higher prevalence of labor violations or human rights abuses. Descartes has engaged in thorough research of typical human rights and labour risks that its business and supply chain may be

The risk assessment will be used in the ongoing supplier due diligence and will be updated as new risks may arise or change over time.

We have established routines to identify, prevent, mitigate and account for how we manage negative impacts on human rights. This includes regular supply chain mapping and risk assessments.

#### 5 Measures implemented and planned

We continuously work to improve transparency and accountability in our supply chain, including:

- Strengthened agreements with suppliers on human rights
- Annual follow-up of high-risk suppliers

#### 6 Results from completed due diligence assessments

Over the past year, Descartes Systems Norway:

- Mapped key suppliers with focus on social risk
- Identified potential risks

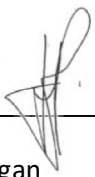
#### 7 Conclusion

Descartes Systems Norway AS reaffirms its commitment to respecting human rights and ensuring decent working conditions. We encourage stakeholders to provide feedback and engage with us in advancing our compliance efforts. For further inquiries or concerns, please contact HR Manager Anna Ekvall at [aekvall@descartes.com](mailto:aekvall@descartes.com).

(Signature page Statement pursuant to The Transparency Act T Descartes System Norway AS)

Norway, 8 July 2025

The Board of Directors

  
\_\_\_\_\_

J. Scott Pagan

Chairman and Director

  
\_\_\_\_\_

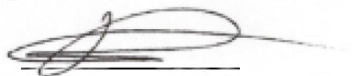
Allan Brett

Board Member

  
\_\_\_\_\_

Fredrik Van Der Heide

Board Member

  
\_\_\_\_\_

Peter Pauwels

Board Member