



Descartes Systems Norway Transparency Act (Åpenhetsloven) statement

Transparency Act Statement

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Background

This statement is created in accordance with the Norwegian Transparency Act. It outlines Descartes Systems Norway AS’s approach to identifying and addressing actual and potential adverse impacts on human rights and decent working conditions.

Company information

Company name: **Descartes Systems Norway AS**
Headquarters: Waterloo

Main activities

The **Descartes Systems Group Inc.** (Descartes) is a Canadian software and Software-as-a-Service (SaaS) company specializing in logistics, transportation management, supply chain execution, and global trade compliance. Headquartered in Waterloo, Ontario, Canada, the company provides technology solutions that help organizations move goods efficiently, securely, and in compliance with international regulations.

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Commitment to Human Rights & Decent Working Conditions

Responsibility for Respecting Human Rights & Ensuring Decent Working Conditions

We are committed to respecting internationally recognized human rights and ensuring decent working conditions across our own operations and throughout our supply chain. This commitment is supported through the implementation of policies and standards including our Code of Business Conduct and Ethics, Supplier Code of Conduct, employment policies, and compliance programs that promote ethical business practices, non-discrimination, health and safety, and respect for human rights.

As a global provider of logistics and supply chain technology solutions, we expect our employees, suppliers, contractors, and business partners to operate in accordance with applicable laws and internationally recognized principles.

We assess and manage risks related to human rights and decent working conditions through our supplier management processes, employee policies, compliance programs, and ongoing due diligence activities. During this reporting period, we continued to strengthen our responsible business practices by enhancing supplier oversight and integrating human rights considerations into our risk assessment and procurement processes.

By adopting and implementing these policies, we integrate human rights and decent working conditions considerations into daily operations, decision-making processes, and supplier engagement. Our approach is guided by internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Business Conduct, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

We have established mechanisms through which individuals affected by our operations or those of our suppliers can raise concerns. These include **whistleblower reporting channels, human resources reporting processes, ethics and compliance reporting mechanisms, and supplier communication channels**. These mechanisms allow employees, contractors, suppliers, business partners, and other stakeholders to report concerns related to unethical conduct, violations of company policies, human rights issues, or breaches of applicable laws. The information received through these channels enables us to identify, assess, and address actual and potential adverse impacts on human rights and decent working conditions in a timely and effective manner.

Human rights & labor standards conventions

Our commitment to respecting fundamental human rights and ensuring decent working conditions is grounded in internationally recognized human rights and labor standards conventions, including the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, and the ILO core Conventions on Fundamental Principles and Rights at Work.

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Human rights due diligence

The human rights due diligence process

We have a structured and ongoing process that is fully embedded into daily business activities. It is designed to identify, assess, prevent, mitigate, and remediate for actual or potential adverse impacts on human rights and decent working conditions—both within our own operations and throughout our supply chain.

Cease, prevent & mitigate impacts

Descartes takes action to cease, prevent, and mitigate adverse impacts identified in its supply chain. Through the Worldfavor platform, we can prioritize risks, work directly with suppliers on corrective actions, and track progress over time to ensure that improvements are achieved.

To help suppliers address gaps identified in the assessment, Worldfavor provides guidance linked to KPIs, enabling suppliers to deepen their understanding of the topics they are evaluated on. The platform also offers practical resources, such as guides on how to write different policies. These tools support suppliers in taking corrective action and strengthening their practices over time, contributing to a more effective and collaborative due diligence process.

Descartes' recent evaluation of suppliers' ESG practices shows an average and median score of 3 out of 5, indicating that sustainability practices are becoming more embedded across our supply chain. These rising baseline levels reduce ESG risks by improving compliance with environmental, social and governance expectations and by demonstrating greater supplier maturity in policies, management systems and reporting.

The progress reflects the effectiveness of targeted corrective actions, proactive supplier engagement and enhanced monitoring, which together have shortened remediation times and increased transparency. We view these results as clear evidence of continuous improvement in our responsible business conduct and will continue to build capacity, raise expectations and refine oversight to drive higher performance across our supplier network.

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.

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

Norway, 7th July 2026

The board of Directors



J. Scott Pagan
Chairman and Director



Fredrik Van Der Heide
Director