



Norwegian Transparency Act

Inspera AS

1. Inspera AS' Business & Organisational Structure

Inspera AS is the parent company of a group of companies whose main business purpose is tied to the delivery of quality digital assessment solutions. It is the main legal entity of the company group, and it is focused on the development of digital assessment solutions that empower educational institutions, professional organisations, and awarding bodies across the world. Inspera's ecosystem ensures that assessments are efficient, effective, and accessible.

Inspera was founded in 1999 in Oslo, Norway. Today, it has 9 subsidiaries and has established itself as a digital assessment leader. It provides digital assessments globally, to nearly 150 institutions. Inspera exists with the core mission of supporting teachers and other educators in developing impartial, trustworthy and meaningful assessments. The ecosystem developed by Inspera provides teachers the tools needed to give students insightful, real-time feedback and analytics. It is focused on benefiting the students while at the same time allowing educators to use the information to customize their teaching methods to each student's needs.

As Inspera believes in a fair and just access to quality education, its digital assessment ecosystem provides multilingual support, assistive technology integrations, and customisable accommodations for hearing, vision, mobility and cognitive disabilities.

Inspera differentiates from the generic service providers in the way it closely collaborates with its clients, in order to comprehend their particular requirements and challenges they face. Inspera aims to offer tailored solutions that meet customer needs, thus being able to positively influence educational change and give institutions the platform and other tools required to reinvent academic assessments.

2. Policies & Governance Managing Impacts on Fundamental Human Rights and Adequate Working Conditions

Inspera's core policies, such as the Code of Conduct, as well as the Reporting & Whistleblowing Policy, the Anti-Bribery and Corruption (ABC) Policy, the Anti-Money Laundering (AML) Policy and the Diversity, Equality & Inclusion (DE&I) Policy form the crucial component of the foundation for our Governance.

Inspera has incorporated its commitments to human and labor rights, environmental responsibility and governance, such as the development of an internal safe reporting system for the employees that wish to report any

misconduct, into its corporate policies. Additionally, Inspera's DE&I Policy is designed to protect all employees against any form of discrimination.

Zero work-related injuries are one of Inspera's goals, and the organisation is dedicated to working to ensure that all incidents are avoided.

Inspira is devoted to upholding the principles of the United Nations Guiding Principles (UNGP) on Business and Human Rights. This entails treating every person impacted by our actions with dignity and upholding their fundamental rights and freedoms.

Additionally, Inspira aligns its mission and vision with selected [Sustainable Development Goals \(SDG\)](#) that contribute to ensuring our operations:

- **Quality Education** (Goal 4): as an organisation with close ties to the Education sector, we firmly believe that inclusive and quality education is a strong indicator for sustainable development. We believe in universal access to a quality education, regardless of the level or area.
- **Gender Equality** (Goal 5): eliminating all forms of discrimination against females is not only essential for a sustainable future but also a basic human right. Inspira vehemently condemns all forms of violence and coercion against all women and girls, human trafficking practices and sexual and other types of exploitation. The organisation is also invested in enabling the access and use of information and communication technologies to promote the empowerment of women and girls.
- **Decent Work and Economic Growth** (Goal 8): everyone is entitled to the right of being properly employed and not subjected to any human rights violation or to modern slavery. We believe in individual freedom and condemn economic stagnation.
- **Industry, Innovation and Infrastructure** (Goal 9): we believe in closing the gap that affects people that cannot access information and knowledge, by promoting innovation and working in guaranteeing universal access to technology.
- **Reduced Inequalities** (Goal 10): we believe that income inequality is a fight worth fighting. In recent decades, income disparity has grown almost everywhere, albeit at varying rates. We actively work in providing benchmarked incomes in any jurisdiction, promoting economic inclusion regardless of gender, ethnic origin, religion, economic situation, disabilities or race, among other characteristics.

At Inspira, we firmly believe that transparent policies and consistent business practices foster loyalty and trust among clients, partners, staff, and communities. Wherever we operate, we are steadfastly committed to upholding all relevant legal obligations and acting morally and responsibly. In all of our interactions, we are dedicated to accuracy, integrity, fairness, and transparency.

3. Actual Adverse Impacts Managed by Inspera AS

Inspera acknowledges the necessity of having procedures in place to identify, avoid, mitigate, and account for how the impact on human rights is addressed and supports the [United Nations Guiding Principles \(UNGP\)](#) and [OECD Guidelines for Multinational Corporations'](#) approach to due diligence. It is acknowledged that this is an ever-going process since risks might fluctuate over time in response to adjustments made to operations and/or external factors.



This assessment is based on the definition of a high-risk product of the Norwegian Government Agency for Financial Management (DFØ), as “(...) when there is a systematic documented high risk of human rights abuse occurring in the supply chain, meaning the value chain from raw material extraction to component production until finishing assembling.”. The construction business, maritime construction, cleaning personnel, seafood processing companies, electricians, road freight and passenger transportation, hotels, restaurants, and catering are all considered high-risk industries under the law.

Inspera does not fall in any of these categories deemed high risk. Companies are required by the Transparency Act to do their own due diligence on human rights in both their internal operations and throughout the whole supplier chain. Since Inspera is considered a service provider, it lacks factories or production locations of its own, as we aim to be a fully digital company. The majority of the products that are provided by Inspera are purchased within the supplier market.

As for suppliers, the due diligence exercise and evaluation of supply chain procedures and processes have not shown any real negative impact on human rights and working conditions, nor have they revealed any major risks with such impact.

Inspira is committed to conducting ongoing due diligence assessments in its business operations and with its suppliers and other business partners as well, even though no significant risks or actual adverse impacts related to human rights and decent working conditions have been uncovered thus far. This is carried out in order to promptly respond to potential or actual adverse impact that may be uncovered in the meantime.

3.1. Inspira's Zero Tolerance Approach

Inspira prides itself on not tolerating any of the following practices across its supply chain, doing business and towards its customers:

3.2.1. Child Labor

Child labor is not acceptable to and at Inspira. In what concerns to hiring practices, Inspira guides itself and the suppliers by meeting the following requirements:

- The individuals must have completed their mandatory schooling;
- The individuals must be at least the legal age to work in the territory they are hired.

On a case by case analysis, both Inspira and its suppliers must follow all local laws related to the hours of work allowed.

Cases of child work are not tolerated nor accepted, by any means, by Inspira.

3.2.2. Forced Labor

As Inspira does not make use of forced labor - slavery, prison, human trafficking or other types of forced labor, the same is required from the suppliers.

Inspira does not tolerate suppliers to make use of exploited workers by any means of fraud, threat, brute force, human trafficking, among others. All work carried out must present a voluntary nature.

All workers are entitled to fair compensation, to be paid on time and in a way that complies with or surpasses existing requirements. This includes but is not limited to paying minimum wages and allowances, overtime, providing benefits, and offering paid time off. Additionally, Inspira encourages its suppliers to pay salaries that are on par with or higher than industry standards, to pay overtime at a rate higher than the standard hourly compensation rate and to implement policies that offer worker benefits, such as paid leave. For labor of "*equal or comparable value*", suppliers must pay workers equally and without discrimination.

Inspira is invested in improving its own practices, as well as presenting itself as a guide to its suppliers, by providing decent working conditions to everyone who

establishes an employment or consulting relationship with the organisation, namely through:

- Providing equal remuneration and promotion;
- Setting rest, leisure, and reasonable limitations on working hours and periodic holidays with pay, as well as compensation for public holidays;
- Sponsoring safe and healthy working conditions and premises, including addressing occupational safety as defined by local legislations, emergency readiness, and workplace injury and illness.

3.2.3. Discrimination & Harassment

Neither Inspera nor its suppliers shall engage on any form of discrimination regardless of it being on the basis of gender, gender identity, sexual orientation, race, ethnicity, color, religion and creed, nationality/citizenship, migration status, ancestry, age, political affiliation, marital and family status, physical or mental disabilities, among others.

All members of the workforce, be it Inspera's or any of its suppliers', must be treated with respect and dignity, based on a zero tolerance towards any form of violence, torture or degrading treatment. Any kind of physical, verbal, sexual or psychological abuse will not be tolerated and it is considered harassment, abuse and/or coercion.

4. Mitigation Measures

Inspera requires that the totality of its employees and consultants complete the mandatory training on Inspera's Code of Conduct, as well as other topics – trainings and awareness sessions related to other topics, such as Anti-Bribery and Corruption, Whistleblowing, Anti-Money Laundering and Diversity, Equality and Inclusion are set to be launched in 2024.

Inspera is strongly pursuing nondiscrimination and fair chances. 32% of Inspera's workforce is female, and nearly 30% occupies C-Suite level positions. Albeit recognizing it seems a low percentage, we are actively working in providing equal opportunities to all genders. Through our whistleblower method, no instances of bullying, harassment, or discrimination were reported in 2022 and 2023.

Regarding suppliers, and according to the risk assessment provided by the DFØ, it's clear that Inspera's high-risk suppliers are the providers of hardware and software, as well as call centers. To reduce the risk, Inspera is continuously working towards the improvement of its Procurement process.

As-Is, the work being done until now focuses mostly on the mapping and categorization of suppliers and business partners, in order to identify the risks associated with these commercial relationships. Hence the importance of Procurement, as the starting point towards improvement. Inspera's goals in terms of Procurement are to manage costs, ensure the availability of high-quality goods

and services, and enhance our company with innovation and sustainability via the supply chain. As we work to ensure ethical business practices regarding people, society, and the environment throughout our supply chain, sustainability is considered in a comprehensive sense, encompassing the environment, social issues, and corporate governance.

For the upcoming times, Inspera will focus on three key areas:

- **Policies & Procedures:** We aim to holistically manage the suppliers with which we have a commercial relationship with, without losing sight of elements such as decent working conditions and sustainability. We are focusing on implementing and standardizing our third-party assessment, facilitating the inventory of suppliers and tracking the possible risks.
- **Training & Awareness:** As mentioned previously, several training and awareness initiatives are set to take place in 2024, with emphasis in the areas of Whistleblowing, Anti-Bribery and Corruption and Anti-Money Laundering, among others.
- **Uniformisation:** develop close collaboration with our suppliers, as to ensure that there is no ambiguity towards Inspera's core values.

5. Right to Request Information

Under Norway Transparency Act, any interested person or third party has the right to request information from Inspera AS concerning how actual or potential adverse impacts on fundamental rights and decent working conditions are addressed.

To support these written requests, the following email address may be contacted: legal@inspera.no.

Signed by:

A handwritten signature in black ink, appearing to be "Andrew Cons".

Andrew Cons
Inspira Global CEO