

AKIND

Due Diligence Statement 2023

NORWEGIAN TRANSPARENCY ACT:

FUNDAMENTAL HUMAN RIGHTS & DECENT WORKING CONDITIONS



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Norwegian Transparency Act Statement

- 2023 -

BACKGROUND

This statement was prepared in order to comply with the Norwegian Transparency Act (NTA). This statement describes: how we – the Akind Group – are structured; our area of operations, guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions; our actual identified adverse impacts and significant risks of adverse impacts; and, measures that we have or plan to implement to cease actual or potential adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.

About the Akind Group

The Akind Group (**Akind**) is a family of brands working together to unlock the growth potential of people and companies. Headquartered in Stockholm, Sweden, we currently have operations in six European countries, more than 10,000 employees – and we continue to grow. Akind Universe AB (Sweden) is the ultimate parent company and its direct subsidiary, Akind Venture AB is the operational entity for Akind.

Currently, Akind includes the following family of brands, which together are striving to assist in the global workforce shift as digitalization, automation, and advances in artificial intelligence disrupt the world of work:

- Akind, support for the Akind Group (finance, IT, marketing, procurement, legal, and human resources)
- Academic Work, the number one career partner for young professionals
- Winona, specialists in executive search and interim management
- Brights, tailor-made learning solutions to unlock brilliance
- Crowd Collective, IT-consulting, leading tech, developing people



AKIND GUIDELINES AND PROCEDURES

For Akind, it is extremely important to be a responsible partner in the global community. We want to contribute to building a sustainable world and we want to be a workplace where we care for and respect one another. The Akind Code of Conduct (“Code”), has always been guided by, among others, the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Universal Declaration of Human Rights, the ILO Declaration of Fundamental Principles of Rights of Work, the Rio Declaration, and the UN’s Convention Against Corruption.

Responsibility for Akind’s human rights due diligence lies with the Board, which has delegated the responsibility to the management of Akind and, specifically, to Akind Sustainability.

The Code applies to companies within the Akind Group and must be followed and respected by all co-workers and consultants. Therefore, to ensure compliance on a multinational level, our policies concerning human rights are set by Akind and flow down to the subsidiaries, which in this particular instance include Academic Work Norway AS (and its subsidiaries) and Brights Learning Norway AS.

Business Partners

Akind requires that its business partners value human rights and has therefore a Code of Conduct for Business Partners (“Code for Business Partners”) that applies to companies within the Akind Group. The Code for Business partners must be followed and respected by suppliers, subcontractors, and business partners. Internal processes ensure that business partners either agree to follow Akind Code for Business Partners, or that they have their own Code of Conduct with no less stringent provisions regarding human rights. All suppliers are vetted using supplier management software to ensure compliance.

Whistleblowing

Akind is committed by its [Whistleblowing Policy](#) to the highest standard of transparency, accountability, and integrity within our business. We are dedicated to ensuring that our company and business are characterized by these key values. Therefore, our employees are encouraged to report any conduct which they believe to be in violation with laws, ethical principles, or our internal policies either to internal managers or to our reporting portal operated and maintained by our third-party service provider, Whistlelink.

HUMAN RIGHTS DUE DILIGENCE WITHIN AKIND

Akind’s ongoing work with human rights due diligence is conducted at the Akind level in consultation with the other brands. One of the benefits of the Akind model is that Akind knows its companies and is therefore extremely well positioned to carry out human right’s due diligence on their behalf. To that end, the due diligence work is carried out using substantially the same model as described in the OECD Due Diligence Guidance for Responsible Business Conduct.

Inherent risks in industry

Akind's operations span the Nordics, Germany, Switzerland, and (soon) the Netherlands, which are highly regulated in terms of health, safety, labor rights and that have low risk of human rights violations. Nonetheless, Akind is aware that its industry carries with it inherent human rights risks. The following areas are those we have identified as areas that carry with them a risk of Akind and its supply chain negatively impacting human rights:

- Discrimination
- Privacy
- Labor relations
- Pay levels

We have not identified any actual human rights impacts in this reporting period but are committed to continuous due diligence to ensure we have no blind spots.

Anti-discrimination

In one way or another, Akind's family of companies is in the business of helping people grow. One large component of this work is recruitment: both internally at Akind and externally for our clients. To ensure that Akind operates in an objective manner during the recruitment process, the Akind Group has adopted Evidence Based Recruitment, which is continuously developed to ensure the recruitment process's objectivity and relevance, keeping it free of discriminatory biases. Evidence Based Recruiting is underpinned by three main principles that greatly reduces inherent biases in the process:

- Validity: the methods used measure only what is essential to a candidate's performance
- Standardization: standardized and systematic collection of candidate information
- Assessment: using mechanical assessments to reduce subjectivity and unconscious biases in decision making

It is important that Akind's employees have the tools to be able to make conscious and responsible choices in their work. Working continuously with training, workshops and discussions is therefore of the utmost importance so that any discriminatory issues do not wind up in the shadows. In addition, the issues of discrimination and equality are included in the annual internal employee survey to ensure that we capture any perceived obstacles and injustices.

Akind's parental policy encourages parental leave for both women and men, and we facilitate in various ways the opportunity to combine family with work. For example, parents are given the option of flexible or individual working hours and reduced overtime. In some markets, we also pay out a supplementary parental salary in addition to the parental allowance from the relevant social insurance agency.

Through weekly anonymous surveys, Akind receives constant opinion and direct feedback on whether there are issues needing further investigation. These surveys contribute to Akind's process development and ensuring we can react in a quick and agile manner.

Privacy

Akind is committed to ensuring that every person with whom the group interacts has their privacy respected, including our internal employees and external employees placed with business partners. Akind works actively with data protection and our robust [Privacy Policy](#) ensures that personal data is collected and processed in a responsible and secure manner to ensure personal integrity.

Labor relations & Pay levels

Akind emphasizes strong labor relations, and consequently strong pay levels in all of its markets. By actively engaging with trade unions throughout our different markets, we ensure that our collective bargaining agreements (“CBA”), for both internal and external employees, result in decent working conditions and strong pay levels, while always complying with applicable laws and regulations. These values are enshrined in the Akind Code and is even a metric upon which our business partners are measured and selected.

DEVELOPMENT DURING 2023

Salience assessment

During 2023 Akind engaged a third-party human rights advisor to ensure that our ongoing human rights due diligence is carried out in accordance with Akind’s principles and the NTA. By the years end, this work has resulted in a salience assessment consistent of three stages:

1. Identification: Based on the information provided by Akind and through additional desktop-based research, our external advisor identified a long list of issues that may be salient to Akind’s operations. The aim of the desktop research was to create an understanding of Akind’s operations and relevant value chain, consider potentially affected people and understand how these stakeholders may be affected.
2. Prioritization: potential issues identified were presented in a collaborative prioritization meeting with Akind representatives.
3. Stakeholder engagement: Stakeholders at every level, both internal and external, have been engaged to ensure that our ambition to promote human rights is mirrored throughout all companies within Akind.

So far, this assessment has not found any salient issues that is not presented above as Inherent risks in industry. However, the full result is expected during 2024.

Job architecture to ensure strong and fair pay levels

Job architecture refers to the infrastructure of jobs within an organization. Job architecture encompasses job levels, job titling conventions, grades and the criteria for career movement.

By creating a Job architecture, we will provide:

- A sound, easy-to-use system for determining the value of jobs based on talent drivers, business needs, and market practices.

- A consistent methodology and decision support for assigning job levels and titles that are based on enterprise-wide criteria, which eliminates guesswork and promotes trust and confidence in the organization's job assignments and rewards practices.
- Workforce planning and career paths that are logical, transparent, fiscally responsible, and support employees and strategic business needs.

Without a systematic analysis of job architecture, organizations run the risk of building their people-based financial systems, such as compensation structures and variable pay programs, on a faulty foundation.

In 2023 Akind started building a common job architecture between companies and countries. By applying a worldwide methodology in collaboration with external supplier, Willis Towers Watsson, we secure an objective model with substantial external benchmark. By implementing this model, we now have the foundation to keep developing and become more objective, fair and transparent. In 2024 our focus area is salary setting and salary model.

LOOKING AHEAD

We are committed to conducting human rights due diligence continuously and in ever-increasing depth. In this regard, we seek to better understand the impact our own operations and supply chain may have on human rights and implement robust human rights due diligence processes that help manage and mitigate these potential impacts.

Request for information

Requests for information and/or to exercise your rights under the NTA, please send an email to legal@akindgroup.com with enough specific information for us to adequately respond to your request.

This report has been signed by the following:

AKIND VENTURE AB

Johan Skarborg, Director

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Johan Skarborg, Chairman

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