# Due diligence procedure for Celsia

Celsia is a software company headquartered in Oslo, Norway. We also have employees in Copenhagen, Berlin and Beirut (employed by our subcontractor). So far, all our customers are in Europe.

This procedure is based on our sustainability policy.

## Ownership and responsibility

The Company Board has the responsibility for establishing the overall framework for responsible business conduct for the organisation, and for reviewing the risks and performance of our operations. Our executive management team is responsible for the work on conducting risk identification and management based on the due diligence process. They have delegated the execution of this work to our CEO, executing through the risk management group consisting of functions from sales and product to ensure that risks are mitigated and prevented in our daily operations.

#### Routine

Our risk management group performs a company risk assessment once a year, and where there are major changes in our operations. Any information or event that impacts the overall risk assessment, is included in the existing risk assessment on a continuous basis. The actual and potential risks are thoroughly mapped, and prioritisation is based on best available information which forms the basis of the selection of measures.

The management team is informed about the progress once a year, or when major changes occur that alter the risk picture.

Board of directors is informed annually or more frequently, when major changes occur or where high risks have been identified.

#### Whistleblowing

We have information about our whistleblower mechanism on our web page and it is accessible for all internal and external stakeholders. We treat all reported concerns seriously and with great caution to ensure that all whistle-blowers are safe.

## Communication

The results of our risk assessment, measures taken, and the expected and actual results of these are reported on annually.

### Revision

The above-mentioned steps of risk assessment, implementation, tracking and reporting are performed on an iterative basis in order to cover changes in risk exposure that can trigger more in-depth assessment and enhanced mitigation.

The procedure is revised annually. Last date for revision: 17. January 2024.