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# 2024 – Eye-share AS Transparency Act



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# Introduction Due Diligence for the period July 2023 to June 2024

In alignment with the Transparency Act and our unwavering commitment to transparency and accountability, Eye-share AS adheres to the OECD (Organization for Economic Co-operation and Development) guidelines and criteria for due diligence in our vendor and sub-processor assessments.

We recognize the importance of integrating internationally recognized standards into our risk management framework to ensure comprehensive evaluations and mitigate potential risks effectively.

This is addressed in our [Supplier Code of Conduct | Guru \(getguru.com\)](#).

This statement addresses the work Eye-share AS, providing Purchase to Pay automation software for our customers regardless of market segmentation, does to stay compliant towards the Transparency Act under Norwegian jurisdiction and legislation.

The statement is arranged by the Department Manager Operations on behalf of the Management Team and signed by the board to ensure anchoring, ownership, and common understanding.

## About Eye-share AS

Eye-share offers market-leading solutions for automated spend management from Purchase-to-Pay.

Our intelligent software portfolio transforms manual routines into digital workflows, so you can spend your time on more strategic tasks.

Please visit our [webpage](#) for a full overview of [services and solutions](#).

Eye-share AS mainly operates in the Norwegian market supporting customer operations in 47 countries with a branch office in Singapore to ensure the best possible customer experience.

Eye-share Operations utilizes MS Azure Public Cloud to leverage the capabilities of cloud computing to ensure seamless operations, scalability, flexibility, and cost efficiency across multiple locations in multiple regions and/or nodes.

Based on location for Eye-share customers, the following regions are implemented as part of eye-share Cloud:

1. NOE – Norway East
2. WEU – Western Europe
3. SEA – Southeast Asia

### Human rights in Eye-share AS

To ensure effective management and governance, it's essential that the subsidiaries adheres to the parent company's corporate policies and rules. Hence, Eye-share adheres all policy and rules set on a corporate level by Tietoevry. This ensures consistency, risk management, and alignment with the overall corporate strategy.

All reporting follows internal supply chain through monthly business reviews in accordance with corporate rules and regulations.

Please visit our common [Sustainability](#) page for further detail.

Code of conduct including is signed upon employment and revisited annually through corporate wide mandatory training.

The scope for all Eye-share and Tietoevry corporate employees:

POLICIES AND PROCESSES COVERING SUSTAINABILITY AREAS			
	Ethical conduct	Climate action	Exciting place to work
Sustainability areas	1. Business ethics and anti-corruption	5. Energy usage and greenhouse gas emissions	7. Diversity and inclusion
	2. Human rights	6. Circular economy practices	8. Employee experience
	3. Cyber security and privacy		
	4. Responsible sourcing		
Policies	<b>Policies, rules and guidelines</b>		
	Code of Conduct policy (1, 2), Non-audit services rule (2, 3), Anti-corruption rule (1, 2), Whistleblowing rule (1, 2, 3, 7, 8), Competition rule (1, 2), Source to Pay policy (4), Supplier Code of Conduct rule (1, 2, 4, 5), Environmental policy (4, 5, 6), Information classification rule (3), Security policy and Security rule (3), User Security rule (3), Privacy policy (3), AI policy and AI rule (1, 3), Health and Safety policy (1, 8), HR policy (1, 2, 7, 8), Insider rule (1), Public Authority Request rule (1, 3), Human Rights policy (1, 2, 3, 4), Travel rule (5), Know your counterparty rule (1, 4)		
Due diligence processes	Internal and external audits (1, 2), Governance, risk and compliance management (1, 2, 3), Sourcing to pay (4), Supplier self assessment (4), Environmental management process (EMS) ISO14001 (4, 5, 6), ISO27001 (3), ISO31000 (3), ISAE3402 audits in Data Centers (3), ISAE 3000 Assurance of non-financial information (1, 2, 3, 4, 5, 7, 8), Information and cyber security audits and assessments (3), CDP Climate Change program (4, 5, 6), HR processes (1, 7, 8), Employee engagement survey (8), Human rights impact assessments (1, 2, 7), Opportunity Management process (1, 3)		
	<b>Sustainability management process, sustainability materiality assessment for Sustainability game plan 2023</b>		
	<b>Whistleblowing channel</b>		

All risks are registered and revisited monthly in corporate GRC-tool in collaboration with corporate representatives.

## Human rights in our supply chain

To ensure compliance and continuous improvement, Eye-share follows a practice of regular check-ins with all vendors in scope and collects ISAE Type 2, SOC 2, or similar reports for assurance.

Our [Supplier Code of Conduct | Guru \(getguru.com\)](#) is communicated as a prerequisite for collaboration

It's the responsibility of the assigned system- and/or process owners to ensure supply-chain compliance!

As part of Tietoevry most of the supply chain is managed on a corporate level. Hence seven vendors are part of the Eye-share specific Due Diligence assessment.

All whistle blowing channels follow the corporate process which is also available to external parties such as customers and suppliers.

The Tietoevry Whistleblowing Channel is operated by an external service provider.

## Identification of Suppliers

All Eye-share specific vendors and suppliers are subject to the Eye-share AS - Transparency Act - Åpenhetsloven - Process.

These include, but are not limited to:

- Cloud service providers
- Customer support service providers
- IT infrastructure service providers
- as well as others handling critical data and processes.

## Requirements to our suppliers

As part of our responsible sourcing process at Eye-share, we have established the following requirements for our suppliers:

### **Compliance with Laws and Regulations:**

The supplier must comply with all applicable laws and regulations, including privacy laws and data security regulations.

### **Transparency:**

The supplier must be transparent in its operations and provide us with sufficient information about their business, practices, and policies.

### **Ethical Practices:**

The supplier must practice ethics and integrity in all their activities and business practices.

### **Data Security:**

The supplier must have robust security measures in place to protect our data against unauthorized access, misuse, or loss.

To ensure that suppliers comply with Eye-share's expectations, we follow up our supply chain with our internal control "SM 1.3 Supplier Management - ISAE 3402" stating:

*Retrieve SOC type II report or similar assurance from suppliers from all applicable vendors, suppliers, processors, and sub-processors, if there is a possibility that related personnel can see confidential information.*

*Ensure service availability and processing according to Local legislation and Eye-share compliance.*

More on Eye-shares ISAE 3402 Type 2 report available [here](#).

### **Assessment Process**

Our due diligence process includes the following steps:

1. Ensure full supplier, vendor, and sub-processor control.
2. Risk and due-diligence assessment.
3. Follow up on all relevant Vendors.
4. Continuous process improvement and inclusion of new vendors, suppliers and/or sub-processors.

To ensure compliance Eye-share AS has established close and continuous collaboration with all supply-chain actors according to listed classification.

Activities, not limited to:

- Retrieval of ISAE 3402 Type 2, SOC 2 and/or similar reports
- NDAs, if applicable

Advocating our [Supplier Code of Conduct](#) in agreements and other fora's.

## Action Plan

Based on the results of the due diligence assessment, we will take the following actions:

- **Approval:**  
Suppliers meeting our criteria will be approved for continued collaboration.
- **Follow-up Actions:**  
For suppliers showing non-compliance, we will implement follow-up actions, such as requesting further information, conducting audits, or requiring improvements in their practices.
- **Termination of Collaboration:**  
If a supplier is unwilling or unable to meet our requirements, we will consider terminating the collaboration and finding an alternative supplier meeting our standards.

## Update and revision

This due diligence assessment will be regularly reviewed and updated in line with changes in legislation, industry practices, and company needs.

Ref. 4.4 we'll, quote: *"Continuous process improvement and inclusion of new vendors, suppliers and/or sub-processors."*

## Due Diligence 2023

No remarks for vendors, suppliers, and sub-processors in scope.

## Due Diligence 2024

During annual Due Diligence no risk or deviation were uncovered. Continuous operation and follow up with check-ins as scheduled were accepted with the six applicable service providers. Annual or bi-annual SOC Type 2 or similar assurance reports have been retrieved and our [Supplier Code of Conduct was communicated](#).

After the initial review, a seventh service provider have been added that is considered medium risk and we have followed up accordingly sending our Transparency Act - questionnaire in addition to continuous follow up with check-ins.

## Conclusion

Eye-share AS is committed to ensuring that our suppliers meet the requirements of transparency laws and other relevant regulations.

Our due diligence assessment and this statement is an important step in maintaining the highest standards of integrity, transparency, and data security in our supply chain.

By continuing thorough assessment and follow-up of our suppliers, we are committed to maintaining trust with our customers and society.

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For the board

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