

# Precis Digital AS and Human Rights

Norwegian Transparency Act

## About the Transparency Act/Åpenhetsloven

The Transparency Act (Åpenhetsloven) is effective July 2022, and its purpose is to ensure companies respect human rights and decent working conditions throughout their supply chain and own operations. The act applies to Precis Digital AS.

## About Precis Digital AS

Precis Digital AS (Precis) specializes in digital media buying, analytics, technology and creative, Precis helps leading brands across industries develop and execute successful data-driven digital strategies. Through our proprietary technology and innovative approach, we have rapidly become one of the leading agencies in Europe and among the highest ranking workplaces in Scandinavia.

Precis Digital AS is part of the Precis Group, which has offices in Sweden, Denmark, Finland, Netherlands, Italy, the UK, and the U.S.

## Our policies and values

At Precis, we know our greatest asset is our people. We believe in investing in diversity, inclusion, employee wellbeing and mental health, learning and development, and safety and security - and through various measures, we strive to ensure a good, healthy and equal work environment.

To guide us in this, we have policies covering discrimination, sexual harassment and bullying, anti-bribery and corruption, anti-tax evasion, sustainability, privacy, whistleblowing and work environment. All employees at Precis read the policies upon joining the company and are regularly updated on any policy changes or additions.

To continuously ensure we are complying with our policies, we have implemented both

an anonymous and encrypted whistle-blowing system as well as an anonymous employee engagement survey that is sent out every second month. Through these channels, employees can raise concerns, share feedback and raise questions.

Precis is committed to providing a safe and healthy work environment for all employees. In this regard, no form of discrimination, harassment, or violence in the workplace will be tolerated. We are also committed to following all applicable laws and regulations regarding human rights in the workplace at the locations where we have staff. Any violations (including suspected) are reported, documented and investigated as appropriate and as required under applicable laws.

## **Risk Assessment**

Before onboarding new vendors, an appropriate selection process is carried out, by which we vet the prospect vendor to ensure, among other things, that it complies with applicable laws on human rights, security and privacy. For this purpose, Precis generally relies on well-known, well reputed and industry standard suppliers. Moreover, as part of our own commitments in this regard, we mainly work with vendors that are present in the EEA.

Our vendors mainly consist of well-known and large companies established in the Norwegian and EEA market. This gives us a good overview of and dialogue with our vendors.

Moreover, we consider the risks for adverse impacts on human rights and decent working conditions throughout our supply chain as low. With regards to our Norwegian vendors, we generally consider the risk as very low since most of them are subject to equivalent legal requirements and reporting obligations. The same can be said to be applicable to our EU vendors since, inter alia, most of our EU based vendors will become subject to the requirements under the CSRD.

In case we should engage a vendor in an industry, or geographical area, known for potential higher risk, we will ensure to vet the vendor and specifically address our expectations that the vendor have routines and procedures in place to ensure that human rights and decent working conditions are respected and that any risks in this regard are prevented or mitigated.

Our due diligence so far has not revealed any actual adverse impacts of significant risks requiring concrete measures beyond our general measures implemented. However, our work on human rights and due diligence is a continuous effort and we therefore continue to develop and evaluate our measures and assessment criteria to capture potential risk, in our own operations as well as among our vendors.

## **Due diligence and our commitment**

Precis expects its suppliers to share our commitment to human rights, equal opportunity in the workplace, and transparency. Suppliers shall conduct their employment practices in full compliance with all applicable laws and regulations. As any violation of human rights or fundamental freedoms are non-acceptable to Precis, we continuously monitor our vendors. In case we should encounter evidence of such violations by a vendor, we will take appropriate measures to address this with the vendor and require them to take immediate action, or ultimately terminate and replace the vendor.

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