

Finago due diligence under the “Transparency Act” (“Åpenhetsloven”)

Finago Group takes human rights seriously and complies with the requirements of the Norwegian “Transparency Act” (lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold). The “Transparency Act” gives the public the right to access information on how Finago handles negative consequences for basic human rights and decent working conditions. The main purpose of the law is to promote companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. Finago's due diligence is published on this page and, starting 2026, also in the Group sustainability report.

Responsibilities, guidelines and routines

As Finago, we stand by our customers and put our people in the center. Our vision is to be the most customer-centric business software company in the Nordics. At the time of writing, the Finago Group has headquarters in Finland and is represented in Norway and Sweden, with the [Group](#) [management](#) responsible.

At Finago, we have developed our own routines for reporting and dealing with actual and potential negative consequences for basic human rights and decent working conditions.

We utilize double materiality framework to map the most material issues for our line of business and evaluate risks and opportunities based on the materiality topics. We also ensure that Code of Conduct is followed by our own companies via regular employee training. We demand our suppliers and partners to comply with the requirements of Supplier Code of Conduct and evaluate them via ESG questionnaire. Potential negative consequences for fundamental human rights lie primarily in the use of subcontractors. As a software company, Finago's Information Security System is based on ISO 27001 and sets strict requirements for regular risk assessment of subcontractors. Assessment of the subcontractors' work in relation to human rights is part of this risk assessment. The company also conducts annual due diligence assessments in relation to the OECD's guidelines for multinational companies.

Any human rights and other ESG risks are evaluated at least annually by Finago ESG committee, consisting of Finago Leadership Team and led by Group Head of ESG.

Result of due diligence assessment

In its due diligence assessment, Finago Group has not identified any significant risk or revealed any negative consequences for fundamental human rights because of the company's work.

Measures to limit negative consequences

By having a conscious focus, as well as having clear reporting channels for employees and external environments, the company believes that the risk of negative consequences for fundamental human rights will be minimal. In addition to this, the employees will be continuously made aware of their actions in areas that deal with this. Finago considers that information about measures that the company has implemented or plans to implement is sufficient and limits the

risk of negative consequences, as can be seen from our EcoVadis rating – in 2025, we were in the top 5% assessed companies globally in sustainability.

Finago Group will continuously assess situations that arise and the extent to which the measures achieve the desired effect.

If you have any questions about Finago due diligence or sustainability work, contact us at esg@finago.com

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Change log

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