



Norwegian Transparency Act

Inspera AS

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Document Information

About this document

At Inspera, we are dedicated to treating our employees and consultants with respect and decency. To promote high industry standards and broaden our beneficial influence, we collaborate with partners and stakeholders from our sector and supply chain.

The purpose of this declaration is to fulfill Inspera's reporting requirements as established in the Norwegian Act on Business Transparency and Work with Fundamental Human Rights and Decent Working Conditions (from now onwards referred to as the "**Transparency Act**") (Norwegian: Åpenhetsloven). This statement covers Inspera AS and it shared the same fundamental corporate processes, supply chains and auxiliary procedures with all its subsidiaries. This document aims to lay forth the actions that Inspera has carried out in order to regulate business operations throughout the supply chain, demonstrating the company's dedication to upholding basic human rights and providing a safe

workplace for every employee and consultant, as well as Inspera's efforts to reduce risks and foster positive outcomes.

History

Ver.	Date	Author	Version comments
1.0	07/02/2024	Legal Team	Initial release.
1,1	01/06/2025	Legal Team	Confirmation
1,2	25/09/2026	Legal Team	Revision and Update

1. Inspera AS' Business & Organisational Structure

Inspira AS is the parent company of a group of companies whose main business purpose is tied to the delivery of quality digital assessment solutions. It is the main legal entity of the company group, and it is focused on the development of digital assessment solutions that empower educational institutions, professional organisations, and awarding bodies across the world. Inspira's ecosystem ensures that assessments are efficient, effective, and accessible.

Inspira was founded in 1999 in Oslo, Norway. Today, it has 9 subsidiaries and has established itself as a digital assessment leader. It provides digital assessments globally, to nearly 150 institutions. Inspira exists with the core mission of supporting teachers and other educators in developing impartial, trustworthy and meaningful assessments. The ecosystem developed by Inspira provides teachers the tools needed to give students insightful, real-time feedback and analytics. It is focused on benefiting the students while at the same time allowing educators to use the information to customize their teaching methods to each student's needs.

As Inspira believes in a fair and just access to quality education, its digital assessment ecosystem provides multilingual support, assistive technology integrations, and customisable accommodations for hearing, vision, mobility and cognitive disabilities.

Inspira differentiates from the generic service providers in the way it closely collaborates with its clients, in order to comprehend their particular requirements and challenges they face. Inspira aims to offer tailored solutions that meet customer needs, thus being able to positively influence educational change and give institutions the platform and other tools required to reinvent academic assessments.

2. Policies & Governance Managing Impacts on Fundamental Human Rights and Adequate Working Conditions

Inspira's core policies, such as the Code of Conduct, as well as the Reporting & Whistleblowing Policy, the Anti-Bribery and Corruption (ABC) Policy, the Anti-Money Laundering (AML) Policy and the Diversity, Equality & Inclusion (DE&I) Policy form the crucial component of the foundation for our Governance.

Inspera has incorporated its commitments to human and labor rights, environmental responsibility and governance, such as the development of an internal safe reporting system for the employees that wish to report any misconduct, into its corporate policies. Additionally, Inspera's DE&I Policy is designed to protect all employees against any form of discrimination.

Zero work-related injuries are one of Inspera's goals, and the organisation is dedicated to working to ensure that all incidents are avoided.

Inspera is devoted to upholding the principles of the United Nations Guiding Principles (UNGP) on Business and Human Rights. This entails treating every person impacted by our actions with dignity and upholding their fundamental rights and freedoms.

Additionally, Inspera aligns its mission and vision with selected [Sustainable Development Goals \(SDG\)](#) that contribute to ensuring our operations:

- **Quality Education** (Goal 4): as an organisation with close ties to the Education sector, we firmly believe that inclusive and quality education is a strong indicator for sustainable development. We believe in universal access to a quality education, regardless of the level or area.
- **Gender Equality** (Goal 5): eliminating all forms of discrimination against females is not only essential for a sustainable future but also a basic human right. Inspera vehemently condemns all forms of violence and coercion against all women and girls, human trafficking practices and sexual and other types of exploitation. The organisation is also invested in enabling the access and use of information and communication technologies to promote the empowerment of women and girls.
- **Decent Work and Economic Growth** (Goal 8): everyone is entitled to the right of being properly employed and not subjected to any human rights violation or to modern slavery. We believe in individual freedom and condemn economic stagnation.
- **Industry, Innovation and Infrastructure** (Goal 9): we believe in closing the gap that affects people that cannot access information and knowledge, by promoting innovation and working in guaranteeing universal access to technology.
- **Reduced Inequalities** (Goal 10): we believe that income inequality is a fight worth fighting. In recent decades, income disparity has grown almost everywhere, albeit at varying rates. We actively work in providing benchmarked incomes in any jurisdiction, promoting economic inclusion regardless of gender, ethnic origin, religion, economic situation, disabilities or race, among other characteristics.

At Inspera, we firmly believe that transparent policies and consistent business practices foster loyalty and trust among clients, partners, staff, and communities. Wherever we operate, we are steadfastly committed to upholding all relevant legal obligations and acting morally and responsibly. In all of our interactions, we are dedicated to accuracy, integrity, fairness, and transparency.

3. Actual Adverse Impacts Managed by Inspera AS

Inspera acknowledges the necessity of having procedures in place to identify, avoid, mitigate, and account for how the impact on human rights is addressed and supports the [United Nations Guiding Principles \(UNGPs\)](#) and [OECD Guidelines for Multinational Corporations](#)' approach to due diligence. It is acknowledged that this is an ever-going process since risks might fluctuate over time in response to adjustments made to operations and/or external factors.



This assessment is based on the definition of a high-risk product of the Norwegian Government Agency for Financial Management (DFØ), as “(...) *when there is a systematic documented high risk of human rights abuse occurring in the supply chain, meaning the value chain from raw material extraction to component production until finishing assembling.*”. The construction business, maritime construction, cleaning personnel, seafood processing companies, electricians, road freight and passenger transportation, hotels, restaurants, and catering are all considered high-risk industries under the law.

Inspera does not fall in any of these categories deemed high risk. Companies are required by the Transparency Act to do their own due diligence on human rights in both their internal operations and throughout the whole supplier chain. Since Inspera is considered a service provider, it lacks factories or production locations of its own, as we aim to be a fully digital company. The

majority of the products that are provided by Inspera are purchased within the supplier market.

As for suppliers, the due diligence exercise and evaluation of supply chain procedures and processes have not shown any real negative impact on human rights and working conditions, nor have they revealed any major risks with such impact.

Inspera is committed to conducting ongoing due diligence assessments in its business operations and with its suppliers and other business partners as well, even though no significant risks or actual adverse impacts related to human rights and decent working conditions have been uncovered thus far. This is carried out in order to promptly respond to potential or actual adverse impact that may be uncovered in the meantime.

3.1. Inspera's Zero Tolerance Approach

Inspera prides itself on not tolerating any of the following practices across its supply chain, doing business and towards its customers:

3.2.1. Child Labor

Child labor is not acceptable to and at Inspera. In what concerns to hiring practices, Inspera guides itself and the suppliers by meeting the following requirements:

- The individuals must have completed their mandatory schooling;
- The individuals must be at least the legal age to work in the territory they are hired.

On a case by case analysis, both Inspera and its suppliers must follow all local laws related to the hours of work allowed.

Cases of child work are not tolerated nor accepted, by any means, by Inspera.

3.2.2. Forced Labor

As Inspera does not make use of forced labor - slavery, prison, human trafficking or other types of forced labor, the same is required from the suppliers.

Inspera does not tolerate suppliers to make use of exploited workers by any means of fraud, threat, brute force, human trafficking, among others. All work carried out must present a voluntary nature.

All workers are entitled to fair compensation, to be paid on time and in a way that complies with or surpasses existing requirements. This includes but is not limited to paying minimum wages and allowances, overtime, providing benefits, and offering paid time off. Additionally, Inspera encourages its suppliers to pay salaries that are on par with or higher than industry standards, to pay overtime at a rate higher than the standard hourly compensation rate and to implement policies

that offer worker benefits, such as paid leave. For labor of “*equal or comparable value*”, suppliers must pay workers equally and without discrimination.

Inspera is invested in improving its own practices, as well as presenting itself as a guide to its suppliers, by providing decent working conditions to everyone who establishes an employment or consulting relationship with the organisation, namely through:

- Providing equal remuneration and promotion;
- Setting rest, leisure, and reasonable limitations on working hours and periodic holidays with pay, as well as compensation for public holidays;
- Sponsoring safe and healthy working conditions and premises, including addressing occupational safety as defined by local legislations, emergency readiness, and workplace injury and illness.

3.2.3. Discrimination & Harassment

Neither Inspera nor its suppliers shall engage on any form of discrimination regardless of it being on the basis of gender, gender identity, sexual orientation, race, ethnicity, color, religion and creed, nationality/citizenship, migration status, ancestry, age, political affiliation, marital and family status, physical or mental disabilities, among others.

All members of the workforce, be it Inspera's or any of its suppliers', must be treated with respect and dignity, based on a zero tolerance towards any form of violence, torture or degrading treatment. Any kind of physical, verbal, sexual or psychological abuse will not be tolerated and it is considered harassment, abuse and/or coercion.

4. Multi-Year ESG Progress & Track Record

i. Governance and Corporate

Strong governance forms the backbone of Inspera's sustainability framework. Inspera has formalised a complete suite of corporate governance policies. All employees and external consultants complete annual mandatory compliance training on the Inspera Assessment platform covering the Code of Conduct, Anti-Bribery & Corruption, Anti-Money Laundering, Whistleblowing, DE&I, and Data Privacy.

ii. Data Privacy & GDPR Excellence

Data protection is fundamental to building trust with educational institutions. Inspera completed a comprehensive Group-wide GDPR review.

iii. Ethical AI Governance & EU AI Act Readiness

Inspira established a specialized Ethical AI Workgroup to oversee AI-driven assessment capabilities. The workgroup ensures product design adheres strictly to principles of fairness, transparency, human-in-the-loop oversight, and biometric data minimisation in full compliance with the European Union AI Act regulations.

iv. Cybersecurity & Information Security

Inspira maintains annual Cyber Essentials and Cyber Essentials+ certifications. Following an extensive internal auditing process, the company is executing its certification roadmap toward full ISO 27001 (Information Security Management) accreditation, with external audits scheduled for late 2026.

v. Responsible Procurement & Supply Chain Resilience

Inspira enacted a Third-Party Due Diligence Policy and mapped 100% of its active supplier database by geographic region and service type. Material vendors are screened using due diligence questionnaires to verify compliance with human rights standards, fair compensation, and modern slavery prevention, meeting all requirements under the Norwegian Transparency Act (Åpenhetsloven).

vi. Social & People (S) Progress

Inspira's people strategy focuses on fostering an inclusive, high-performance workplace culture that attracts top international talent, encourages professional growth, and ensures long-term employee retention.

Through targeted talent retention initiatives, structured onboarding, and transparent internal communication (including quarterly town halls and regular newsletter updates), Inspira achieved significant workforce stabilization. Employee retention improved substantially across all operating units, maintaining turnover well within target operational limits.

Employee sentiment experienced a dramatic turnaround, with our Employee Net Promoter Score (eNPS) surging by +23 point. Survey participation reached 63%, and a strategic goal has been established to achieve ≥90% participation in future feedback cycles to ensure robust organizational data integrity.

vii. Diversity, Equity, Inclusion & Community

Inspira established a formal DE&I Committee and rolled out mandatory diversity training group-wide. Unique leadership diversity stands at 22.22% across the executive leadership and governing bodies.

In 2025, Inspera launched its 'Donate a Day' corporate volunteering initiative, providing all employees with paid leave to contribute to educational and environmental community causes.

viii. Environment & Climate (E) Progress

As a pure cloud software business, Inspera operates a paperless, low-carbon operational footprint. The company does not own manufacturing facilities or vehicle fleets, maintaining 0 tCO₂e of direct Scope 1 and Scope 2 emissions.

Inspira tracks its greenhouse gas (GHG) emissions quarterly using the Persefoni carbon accounting platform. Through travel policy adjustments, cloud hosting optimization with AWS, and disciplined procurement, Inspera achieved a 61.4% absolute reduction in Scope 3 emissions, which dropped from 1,257 tCO₂e in 2024 to 485 tCO₂e in 2025.

To further refine environmental accuracy, Inspera deployed employee commuting and teleworking surveys across its remote workforce. The company published its first public-facing ESG Sustainability Statement and is actively aligning its reduction roadmap with the Science-Based Targets initiative (SBTi).

5. Right to Request Information

Under Norway Transparency Act, any interested person or third party has the right to request information from Inspera AS concerning how actual or potential adverse impacts on fundamental rights and decent working conditions are addressed.

To support these written requests, the following email address may be contacted: legal@inspera.no.

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