

The Cloud People Transparency Act Statement

Oslo, 30 June 2026

1. The Cloud People AS – Description of the business

The Cloud People is a highly esteemed leader in the industry and a dynamic partner of ServiceNow, committed to delivering exceptional value and unparalleled customer experiences across multiple sectors. The Cloud People was acquired by NTT Data Business Solutions 17. December 2025 and is now part of the NTT Group.

Our global consultancy team spans across Europe and the Americas, guaranteeing a holistic partnership with a customized approach. We take pride in housing one of the largest cohorts of certified ServiceNow experts, dedicated to providing top-tier support to our clients at all times. Our extensive understanding of the Now platform positions us as a dedicated ServiceNow lifecycle Partner, enabling us to be best placed to support our clients on their digitalisation journey.

Our approach is tailored to cater individual sector requirements, facilitating access to experts within the necessary industries in a clear and transparent manner. This means that our unique proposition is closely aligned with the essential business needs that the ServiceNow platform addresses for our shared clients.

The company has 311 employees and 13 offices in 8 different countries. Our headquarter is located in Oslo, Norway.

The Cloud People business is based on four main pillars; Expertise, Transparency, Innovation and Flexibility.

Expertise

- Our breadth of talent and in-depth knowledge of cloud services, unique ability to unlock latent potential, and Solution Offerings provide a solid foundation for our customers journey. Our tiered talent system ensures access to the precise expertise needed, while continuous learning keeps our talent pool at the industry's forefront.

Transparency

- We offer clarity, honesty, and visibility at every step. Our guidance helps partners uncover and extract untapped value in their investments. Our Smart Resources model and the Cloudia platform provide a clear and predictable path to accelerated time-to-value. We maintain open communication and process transparency, ensuring our customers are always informed and confident.

Innovation

- We stay at the forefront of the cloud services landscape through constant innovation and best practice development. Our Solution offering and methods to fast-track

underused functions to enhance platform performance. Our innovative platform, Cloudia, and tiered talent system transform the traditional talent search process. We relentlessly pursue innovation to deliver value in unexpected ways.

Flexibility

- We understand that each business is unique, with its own challenges and requirements. That's why we prioritize flexibility in our overall offering. Our value-proven workflows and smart resourcing can be tailored to meet your specific needs, allowing us to adapt and scale up-and-down with your evolving business demands. We offer flexible solutions that align with your goals, ensuring that your user experiences are optimized while accommodating your individual circumstances.

The company has a continuous focus on sustainability, health & safety and quality and is certified in all TCP Countries with ISO 9001, 14001 and 45001 with a focus on reduction of the climate footprint through, among other things, utilization of the circular economy. In addition to this TCP is certified in the same countries for ISO 27001.

TCP also works actively for inclusion and diversity. This work is anchored in the Board, Management and in the entire organization following our culture based 4 "F's":

Future

- We are the future workplace. In The Cloud People, we focus on being a modern and fuzz-free workplace. We have a bring your own device policy and you get a budget for equipment based on your personal needs. You get a monthly amount on top of your salary to avoid the time consuming expenses. You have your own budget and time each month dedicated for your personal development. We encourage flexibility and care about your work/life balance.

Focus

- Our focus is exclusively on the two leading Cloud platforms in the market today, GCP and ServiceNow, and our top priority is to offer our customers the very best services and expertise within these areas. This is done by the dedicated and talented People in our company

Fair

- We have a fair and equal-to-all grade system which is the foundation for salaries, hourly rates and your career plan. This model is 100% transparent and based on a grade matrix which is calculated on the criteria such as experience, skills, certifications, knowledge sharing and CSAT.

Fun

- We have fun at work - every day. Our very own social committee makes sure we meet up; online, at the office, in teams and out of office. If you like to work out, we have weekly online workout sessions with a personal trainer. Our yearly team building event is one of the social highlights, where the whole company meets up to have fun and get to know each other better.

2. Ethical guidelines for responsible business

TCP has established its own ethical guidelines for responsible business, which form the basis for dialogue with and follow-up of our most important suppliers of products, licenses and business services.

INTRODUCTION

All products or services offered by TCP are expected to be produced and procured under responsible conditions. To ensure quality, TCP follows the ISO guidelines (Integrated Management System (IMS) we build to get ISO certified) and requirements which TCP also requires from her suppliers and partners.

PRINCIPLES OF RESPONSIBLE BUSINESS

Any third party that supplies products or services to TCP, hereinafter "Supplier", is further expected to comply with the UN's Declaration of Human Rights, the UN's 10 principles of responsibility business, the UN Convention against Corruption, the UN's guiding principles for business and human rights, the ILO's core conventions including the declaration of fundamental principles and labor rights, as well as the Rio Declaration on Environment and Development, hereinafter "Principles for Responsible Business".

This includes an obligation for the Supplier to have internal policies in place that express for corresponding obligations in own operations and in supply chains. The supplier is therefore as an absolute minimum responsible for ensuring compliance with the principles specified below. This responsibility applies to the Supplier's own business and in all stages of the Supplier's supply chain.

REQUIREMENTS FOR OUR SUPPLIERS

Human rights and decent working conditions

Child labour

The supplier must never allow workers under the age of 15. Such persons must also be actively protected against hazardous work, overtime work, night work and any work that may have a negative impact on their physical and mental development.

Forced labor

It must be voluntary for employees to work. The supplier must not support any form of slavery or forced labor. No employee shall be subject to unlawful reduction of payment or benefits, submission of official documentation to the employer or forced overtime.

Contract

All employees, including temporary employees and consultants, must have a legal employment or consultancy contract in the language that the employee understands, which specifies working conditions.

Discrimination

No discrimination is allowed. This applies both to recruitment and subsequent employment. The criteria for employment, and for retaining the position, must be actual ability to perform the tasks, and never gender, marital status, pregnancy, race, skin color, age, sexual orientation, religion, political perception, trade union membership, function as an employee representative, nationality, health status or disability. All employees must be treated with respect and dignity. The supplier must not participate in, or otherwise allow, bullying, threats, violence, physical or sexual harassment or abuse in the workplace. The workplace must have established adequate measures to immediately deal with any violations of the above.

Freedom of organization and collective bargaining

All employees must have the right to organize, to join associations and collective negotiations without restrictions or sanctions from the employer. The supplier must ensure to maintain effective lines of communication with both employees and their representatives there it is appropriate.

Working time

Working hours and leave conditions must comply with local legislation, any collective agreement and/or industry standard.

Health and safety

All employees have a right to a safe and sanitary working environment. To reduce the risk of injury and in order to promote a safe working environment, employers must (as a minimum) meet the following conditions:

- Provide adequate health and safety training related to occupational risks, such as first aid, fire fighting, handling chemicals and similar
- Free access to relevant personal protective equipment and appropriate training for the use of such equipment
- Ensure access to healthy and nutritious food and clean drinking water
- Have necessary facilities on site, including toilets, changing rooms, dining area with relevant standards for hygiene, health and fire safety
- Ensure that all buildings used by employees meet relevant safety regulations for the building and have all relevant permits/certificates. This includes electrical installations, which must be maintained by competent personnel
- Have representatives for health and safety in the workplace
- Implement proportionate procedures for incident and risk management

Environment

The supplier must ensure that all operations are carried out in accordance with current environmental legislation, including that all relevant registrations, permits and/or licenses are obtained. Eventual negative impacts resulting from the Supplier's operations must be reduced as much as possible. The supplier must ensure that there are sufficient procedures in place at all times to insure this.

Anti-corruption

TCP has zero tolerance for corruption. This includes all forms of corruption (both receiving and offering), including but not limited to kickbacks, extortion, facilitation payments or bribes. The supplier must act with integrity and compliance with ethical standards in all matters that concern their business and have relevant measures in place to deal with potential corruption.

REQUIREMENTS FOR REPORTING

In case of deviation from these ethical guidelines, the supplier must notify TCP of the deviation and which ones measures that are implemented to close the discrepancy.

3. Routines for handling and reporting identified risks

TCP has established routines for following up on our suppliers' transparency and work with basic human rights and decent working conditions. The dialogue about and reporting of risk takes place through obtaining confirmations in the form of a questionnaire that reflects our ethical guidelines and/or by publishing a link to this information on the supplier's website. TCP obtains the aforementioned information and documentation from all new suppliers. For TCP, any supplier can be at risk of breaching basic human rights and decent working conditions.

As of June 2026, TCP's most important suppliers/partners are the subject of the dialogue about and follow-up human rights and working conditions:

- ServiceNow Nederland BV
- Google Cloud Emea Limited
- Ilmarinen Keskinainen Eläkevakuutusyhtio
- Thune Eureka AS
- SoftwareOne AS
- Deel Inc
- Gjensidige Pensjonsforsikring AS
- Bomberg Oy
- Ainia Solutions Oy
- View Group As
- HL Vision One GmbH & Co. Geschlossene Investment-KG
- Nard AS
- Cushman & Wakefield Property Solutions BV

All these suppliers/partners are supporting business and growth of TCP therefore our follow-up is aimed at these suppliers, who in turn document their follow-up further in the supply chain vis-à-vis its manufacturers. TCP makes up a relatively small share of these suppliers' turnover of said products and therefore has limited influence on conditions in the supply chain. We will nevertheless continue to follow up and influence in order to ensure the best possible outcome conditions related to human rights and working conditions. In addition to ongoing handling of registered users' negative consequences and risks, there will be annual reviews and due diligence assessments (through questionnaires and/or review meetings) with most important suppliers.

Internally at TCP, basic human rights and decent working conditions are ongoing subject to follow-up, with an annual audit.

Wim Jonkers, COO in TCP, (wim.jonkers@thecloudpeople.com) is on behalf of the Board and the company's management team responsible for TCP following the provisions of the Transparency Act.