

# Transparency Report 2023



# 🔄 Human Rights Report 2023

#### Who are we

Cognite is a global industrial SaaS company positioned to accelerate the full-scale digital transformationofasset-heavyindustriesbydelivering accessible, trustworthy, and contextualized data. Cognite's core product, Cognite Data Fusion<sup>®</sup>, provides simple access to complex industrial data by consolidating operational, engineering, and IT data and enabling subject matter experts to quickly and reliably turn industrial data into business value. Cognite Data Fusion<sup>®</sup> is designed for industry, empowering anyone to use data to solve industrial problems with speed and ease, and delivering on Cognite's vision to use data and algorithms to shape an efficient, safer, and more sustainable industrial future.

Founded in Oslo, Norway, in 2017, Cognitehas a global presence, with offices in the United States of America ("US"), the United Kingdom ("UK"), and Japan, as well as employees operating from smaller hubs around the world. In this report, Cognite AS is referred to as "Cognite" or "the Company," and Cognite AS and its subsidiaries are collectively referred to as "Cognite Group" or "the Group" unless otherwise specified. Cognite's largest shareholders include parent company Aker Capital, the venture capital firms Accel (~13%) and TCV (~10%), and Saudi Aramco (7.4%).

Cognite has experienced continued growth, ending the year with 574 global, full-time employees, of which 476 are employed by Cognite AS, representing a mix of experts from across the world of technology and industry. Coming from more than 60 countries, Cognite's people bring a wide variety of backgrounds and professional experience from many industrial domains, including oil and gas, manufacturing, and power and renewables.

## Human Rights Commitment

Cognite's vision is an industrial world powered by data and algorithms, freeing human creativity to shape a safer, more efficient, and more sustainable industrial future. Our flagship product, the Industrial DataOps platform Cognite Data Fusion<sup>®</sup>, enables industrial data and domain users to collaborate quickly and safely to develop, operationalize, and scale industrial Al solutions and applications to deliver a safer and more sustainable industrial environment.

Our human rights program aligns with the principles set out in:

- the OECD Guidelines for Multinational Enterprises;
- the UN Guiding Principles on Business and Human Rights, and
- the Norwegian Transparency Act.

Our respect for human rights is grounded on careful and ongoing efforts to identify and address, first and foremost, workers right across our operations and supply chain with transparency and accountability. We aim to create and improve mechanisms to identify, prevent, mitigate, and remedy our most relevant human rights impacts.

# Human Rights Oversight

As an integral element of their oversight of Cognite's overall Human Rights strategy and risk management, the Board of Directors and its committees provide governance oversight with respect to the Company's environmental, social, and governance (ESG) strategies and initiatives, including human rights. The Audit Committee has been given a review role related to ESG compliance, including the risk of adverse impacts on human rights, and it assists the Board in overseeing the company's management. This role ensures a thorough treatment of the area and reporting in accordance with the requirements set forth in the Transparency Act. Risks connected to real or possible negative impacts on human rights and decent working conditions are reviewed by the Board and Audit Committee as part of the annual risk review. The new Transparency Act's roles and implementation procedure were established with and authorized by the Board of Directors. Updates are reported to the Audit Committee to enable tracking of progress. Cognite's Compliance Officer is responsible for operational oversight of human rights governance, due diligence of third parties, risk reporting, training and awareness as well as annual reporting.

## Human Rights Governance

Cognite's respect for human rights, equity, diversity, inclusion, and privacy has been embedded across our organization, and we continue to improve our processes each year.

- Cognite personnel, vendors, and commercial partners are all subject to our Code of Conduct, which sets out our corporate ethics and compliance commitment, including workers' rights.
- Cognite has a Human Rights Policy which gives an overview of our human rights pledge and due diligence. Our Human Rights Policy also allows the general public to seek more information about our human rights program as well as the ability to report misconduct either anonymously through our Whistleblower Channel or directly to our Compliance Officer.
- Cognite's Supplier Declaration requires that all our vendors and commercial partners commit to respecting human rights.
- For selected partners, we carry our Compliance Due Diligence, which includes questions related to workers' rights, anti-corruption, sustainability, health and safety, and privacy.
- Cognite also has an ongoing privacy program, and several privacy policies to ensure privacy is respected whenever personal data is processed.

## Human Rights Due Diligence

Cognite has a practical approach to proactively identify and mitigate any potential human rights risk in our operational supply chain and from our commercial partners. Given our operations and industry, the focus is on our suppliers' respect and support for workers' rights. Many of our suppliers are technology companies with highly skilled workforces based in countries with good human rights track records. As such, our risk criteria are very different to industries that deal in manufacturing and production.

Our suppliers can be broken into the following categories:

- Cloud providers;
- Software providers, mostly software as a service (SaaS);
- Office suppliers;
- Hospitality (office rental and events);

- Computer equipment;
- Recruitment services.

Our focus here is workers rights including:

- Working conditions and health and safety;
- Discrimination;
- Minimum Wage;
- Freedom of association;
- Privacy.

There is always a risk that we might be linked to human rights violations through some of our suppliers' indirect suppliers.

#### Our Risk Assessment

Our human rights screening does not only look for actual human rights violations but also potential human rights breaches. Our human rights risk criteria consist of a two-staged approach:

- 1. Cognite screens all suppliers and commercial partners, with a particular focus given to high-risk countries;
- 2. Suppliers and Partners in high-risk countries and/ or with adverse media are required to complete a Compliance Due Diligence questionnaire where they provide additional information about their compliance program and human rights/workers' rights policies.

During 2023, Cognite conducted a risk assessment across its supply chain and partners and identified no human rights violations. The size of the vendor and ESG maturity are considered before compliance Due Diligence is initiated. Small and medium-sized enterprise (SME) partners and vendors might not have a dedicated policy in place on working conditions, health and safety, discrimination, minimum wage, freedom of association, and privacy. In these instances, we ask for additional information and assurance that workers are protected adequately.

As a global technology company, we have commercial partners and vendors across numerous jurisdictions, including in the Middle East and Sri Lanka, where human rights abuses are routinely reported by international human rights organizations. We acknowledge the inherent risk of operating in such an environment and strive to uphold our values and commitments to respect workers' rights.

#### **Training and Awareness**

Cognite also provides Code of Conduct training to all Cogniters and consultants annually. Cognite's annual compliance training focuses on anti-corruption, sanction, privacy, anti-sexual harassment, and how each Cogniter can help contribute to a good, healthy working enviroment (Cognite Culture). Our focus is to provide staff with training and awareness on various scenarios that could inadvertently infringe on fundamental human rights. Cognite's compliance training is mandatory, and as part of the training, we require all Cogniters and consultants to sign and acknowledge our Anti-Corruption Policy and Code of Conduct.

#### Cognite's Human Rights Standard

We are devoted to addressing any potential future violations of human rights. We believe in involving stakeholders and using our position to effect positive change in order to address and resolve any identified human rights risk in good faith. If there is a conflict between our values and the commercial relationship, or if we are convinced that the risks outweigh the potential benefits, we will not participate or sign a sales agreement.

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