



UNIVERS | BAZEFIELD

DUE DILIGENCE REPORT

Reporting period: 2024

Document number: BF-01-ORG-012

Classification: Private

Revision: 4A

Approved: Sigurd Juvik

Date: 30/04/2025

Document history

Revision	Status	Date	Description	Writer	Controller	Approver
1	A	16.06.2023	New document. Report for 2022.	Gro Kvitnes, Fredrik Amundsen	Management	Sigurd Juvik
2	A	29.09.2023	Update company name	Gro Kvitnes, Fredrik Amundsen	Management	Sigurd Juvik
3	A	16.04.2024	Report issued for 2023. Based on updated supplier and risk assessment. Other document/report changes: <ul style="list-style-type: none"> - Document restructured (clearer reference to Transparency Act section 5) - Added reporting period 	Gro Kvitnes, Fredrik Amundsen	Management	Sigurd Juvik
4	A	30.04.2025	Report issued for 2024	Gro Kvitnes, Fredrik Amundsen	Management	Sigurd Juvik

Revision: Running number is updated on every change in document

Status: A=Approved, D=Draft, X=Obsolete. Last approved document is the official document.

Date: DD.MM.YYYY

Description: Every change in document is described in short

Writer: person who creates document or document change

Controller: person who controls document or document change (optional)

Approver: person who approves document or document change

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1 INTRODUCTION TO UNIVERS AS

1.1 GENERAL DESCRIPTION OF ENTERPRISE STRUCTURE

Univers AS is a Norwegian software company with a subsidiary company in USA, also consolidated referred to as Univers Bazefield. The majority of our employees work at either our head office in Porsgrunn, Norway or at our offices in USA located in San Diego and Philadelphia. Univers AS is part of the Univers based in Singapore.

1.2 AREA OF OPERATIONS

Univers Bazefield is an independent global product supplier for operations management software within renewable industry with customers in more than 50 countries globally. The system is based on the same foundation that has shown its scalability, performance, reliability, and robustness for our customers over many years in different industries. Univers Bazefield is vendor independent and based on the latest international standards. The system is scalable from a single site to large multisite portfolios, and captures real-time data, monitors, and control of the assets, supplies several tools for visualization, analysis, and supports workflow, and provides overview and key performance measurements of the operation. This also includes a user-friendly portal, flexible dashboards design functionality.

With extensive built-in asset modelling capabilities for solar, wind, hydro, batteries and other technologies, and turnkey template support for all market leading vendors SCADA systems, such experience and knowledge allow the company to offer lower cost of installation and implementation for our customers. The system also includes rapid and cost-effective data modelling and configuration tools for setting up a turnkey system, configured to customer needs. Our goal is to be the best global product supplier for operations management software within renewable power. We put a lot of investments, efforts, and passion into reaching this vision. The main activities in Univers Bazefield include development projects, marketing and communication, programming, sales, customer deliveries - including adaptation of the software to the customers' needs, customer support, ICT operation and administration of employees. We do not manufacture any goods. 91% of our supplier base of 163 suppliers and partners consists of service providers (not goods). 50% of these are located in Norway and 90% are located within North America and EEA.

1.3 INCORPORATION OF THE NORWEGIAN TRANSPARANCY ACT (ÅPENHETSLOVEN)

The Norwegian Transparency Act (*Nw: Åpenhetsloven*) entered into force on 1 July 2022, and aims to promote companies' respect for basic human rights and decent working conditions in connection with the production and delivery of goods and services. The due diligence assessments must cover the company's own operations as well as the operations of suppliers and business partners.

Focusing on people's and employees' rights is important to Univers Bazefield, and this applies to our own business, our partners, our suppliers and our employees. Our customers and partners must be able to be sure that our services come from a responsible supply chain.

Univers Bazefield has established guidelines for how we should work with human rights. Univers Bazefield's work to respect human rights and ensure decent working conditions is anchored in the management and the Board as well as in our internal guidelines and procedures. Univers Bazefield's Ethical guidelines for

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employees describe how we should behave internally and in contact with business relationships. Our Ethical guidelines for business partners and suppliers which we require as part of contracts and require that suppliers and business partners comply with set requirements to respect human rights and to ensure decent working conditions in their businesses and associated supply chain. The guidelines lay the foundation for our follow-up and our cooperation with partners and suppliers. Management documents provide guidelines for how Univers Bazefield are to carry out due diligence assessments. The CFO has the overall responsibility for this work, and the Quality Director in Univers Bazefield coordinates the work continuously. The procurement functions in Univers Bazefield have an important role in risk mapping and supplier follow-up, and common routine descriptions for the procurement processes have been established to meet the Company's expectations for our work in safeguarding human rights.

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2 DUE DILIGENCE ASSESSMENT

Our due diligence assessment is carried out regularly and is risk-based, proportionate and in accordance with the following international guidelines and recommendations:

The UN's guiding principles for business and human rights:

<https://www.unglobalcompact.org/library/2->

The OECD's guide for due diligence assessments for responsible business (see Figure 1 below):

<https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

The International labor organization ILO's declaration on basic principles and rights in working life:

<https://www.ilo.org/declaration/lang—en/index.htm>

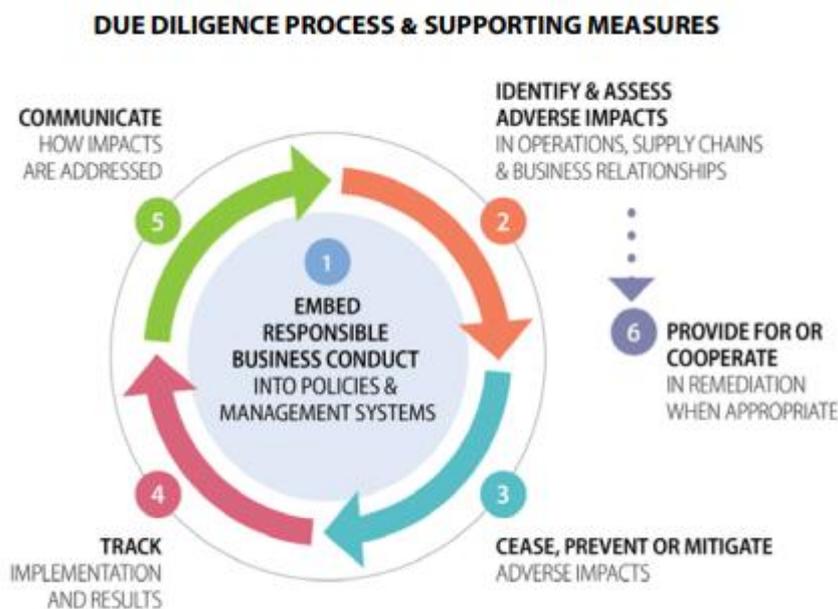


Figure 1. The OECD's 6-step model for due diligence assessments

2.1 SCOPE OF THE DUE DILIGENCE ASSESSMENT

The requirements to carry out a due diligence assessment in principle include our own operations in Univers Bazefield, our collaboration partners and our suppliers and their subcontractors.

At Univers Bazefield, we have assessed the risk of violations of human rights and employee rights in our own business, and based on the nature of the business, all of our identified risks (working hours, health and safety) are considered to be low and measures to stop, reduce and prevent possible violations, is taken care of by our HR system. After assessing the overall risk, we have identified the risk to be highest in categories related to our supply chain.

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Since measures under the Transparency Act must be risk-based and proportionate, it is our suppliers in high-risk categories within our core business who will primarily be subject to our due diligence assessment measures. Such measures can be background checks and various follow-up measures and dialogue (for example self-evaluation/audits/physical inspections). The supplier categorization is continually re-assessed, and all suppliers may be re-prioritized should the risk change.

Assessing the risk of actual and possible violations of employee rights and human rights is a continuous process. All our new and existing partners and suppliers must undergo a due diligence assessment, and this is a condition for entering into a contract. This is also embedded into our ISO 9001 certified Quality Management System (QMS).

2.2 RISK ASSESSMENT

We have established a methodology and a tool for carrying out overall risk assessments around human rights and employee rights, which facilitate a risk-based approach in our follow-up of collaboration partners and suppliers. The following parameters are used to prioritize further due diligence assessments and the development of measures:

- The company's country of origin, or where the goods are manufactured, or services provided from
- Purchase category and the category's risk level

In the risk mapping, we use recognized sources (as recommended in the OECD's guide for responsible business), for example anskaffelser.no and unepfi.org, to classify suppliers within country/geographical area and procurement category. These sources give us an objective overview of the risk picture at category level.

Despite our relatively small supplier base, procurement categories with the greatest risk will be prioritized for further investigations and measures. One such category is goods and services for ICT.

We then prioritize further follow-up based on where we see the greatest risk, as well as on our knowledge of this risk and its impact on our core business.

In the current reporting period (January 1 – December 31, 2024), we first listed our current suppliers and partners and followed the risk-based prequalification process as described earlier, with evaluation and categorization of our current suppliers and partners to identify where our highest risk lies.

Relevant employees receive training in assessing new suppliers, and we have increased awareness of responsible procurement throughout the organization.

2.3 STAKEHOLDER INVOLVEMENT

In order to uncover possible and actual negative consequences, Univers Bazefield has established a notification channel for internal and external stakeholders. This is communicated both externally on our website about transparency work and internally in our personnel handbook.

A notice must be justified and sent in writing to the CFO and COO via e-mail or as a written document in a sealed envelope marked "Confidential notice".

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The matter is dealt with in the management team within 7 days, written feedback is given to the whistleblower and action is taken. Reporting can be done anonymously, but there is a risk that the case will be closed if further information cannot be obtained when the case requires this.

In addition, Univers Bazefield has a deviation reporting system that simplifies the notification of deviations and the handling of deviations for questions about HSE, quality or safety. Customer complaints are collected via our customer service system. These systems are also embedded into our ISO 9001 certified QMS.

Contact information for information on Univers’ work to comply with the requirements in the Transparency Act, or for reporting of breaches is CFO/COO Fredrik Seim Amundrød. Please use the e-mail compliance@bazefield.com

2.4 IDENTIFIED RISKS

In the current reporting period, the total number of suppliers and partners was 163. Most (90%) of these are located in Norway and other parts of EEA and North America and the suppliers and partners are mainly providing services (91%). Based on our risk assessment method, we have classified most of them as low-risk suppliers.

However, we identify our greatest risk to be among our 5 suppliers who supply goods and services out of India and 6 suppliers who supply services out of Brazil. Potential risks may relate to child labor, discrimination, sexual harassment, and violence against women, forced labor, health and safety in the workplace, violations of workers' rights to establish or join a trade union and to bargain collectively, non-compliance with minimum wage regulations, use of dangerous chemicals, infringement of the right to own, and the rights of minorities.

To reduce risks, our focus is to prioritize suppliers who actively work with due diligence assessments and at the same time both recognize and manage these risks and encourage suppliers to change their company policies to be more compliant to our company policies.

We have not identified any other high-risk categories for us based on the nature and location of our direct suppliers and/or any indirect suppliers connected to a high-risk country.

Through our due diligence assessment in the current reporting period, no actual negative consequences have been uncovered.

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3 IMPLEMENTED AND PLANNED MEASURES

The findings in our due diligence assessment have indicated potential improvements. When it comes to the possible risk of human rights violations related to our subcontractors, we ask our partners and high-risk suppliers to identify or investigate such risks further down their own supply chain. Risk prevention activities remains:

- Reduce the likelihood of contributing to a negative impact by carrying out pre-qualification and risk mapping of a collaboration partner or a supplier in advance of agreements.
- Increase inflactivities remainsss relationships by including our ethical guidelines for business partners and suppliers in all agreements, which enables us to set requirements and verify compliance.
- Follow up compliance with our ethical guidelines.

Our risk assessment tool is also designed to prioritize suppliers with a risk-based approach, prepare action plans and follow up on implementation.

In cases where we uncover actual violations of human or employee rights, our approach must be supportive and constructive towards the collaboration partner or supplier, as we recognize that not everyone has incorporated good enough routines yet to prevent, uncover or identify actual or possible violations. We shall take responsibility for ensuring, or collaborating on, recovery together with stakeholders when this is necessary.

Univers Bazefield conducts at minimum an annual evaluation of suppliers as part of our ISO 9001 certified QMS. More frequent evaluations can be conducted based on a risk-based approach or other events that come to our knowledge.

3.1 RESULTS OF MEASURES

Interviews with our suppliers, or obtaining documentation (formal agreements or documentation of expectations, confirmations of compliance with requirements, etc.) from suppliers with an obvious high risk are our methods for assessing compliance with guidelines etc., with the aim of stopping or reducing possible violations. We are also in close dialogue with the employees in the day-to-day operations, and find the company's guidelines and practices to be satisfactory and very well organized.

The due diligence assessment as a whole has given us a good understanding of the possible risks for our business and in our supply chain, and is a valuable tool for us in the future to recognize and prioritize areas for improvement to minimize the risk of negative impact on employee rights and human rights. As a natural consequence of this process, we will have fewer suppliers, which contributes to a better overview and sustainability in our daily operations.

3.2 FURTHER PLANS

During the next reporting period, we will:

- Further develop and improve implemented measures to cover more existing suppliers and review agreements.
- Focus on preventive work in the areas where we have mapped high risk and prioritized for follow-up.

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- Actively assess the number of suppliers, and map out opportunities to reduce our supplier base. Among other things, this will simplify further follow-up.
- Follow up relevant suppliers in the high-risk category and implement improvement measures where the risk mapping identifies this as necessary.
- Further develop our follow-up work by developing key indicators to measure the implementation and results of our due diligence assessment. This will be regularly communicated to our employees to raise awareness and ensure accountability in our business relationships and throughout our supply chain.

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4 DOCUMENT MANAGEMENT

The owner of this document and the documents' approval status can be viewed in the Airtable workspace **Bazefield Compliance Management System**, base **Compliance Tracking**, table **Bazefield QMS and ISMS documents**.

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