

TELLU AS

Policy

Sustainability Policy

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Sustainability Policy

Field	Value
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Version	4.1
Document owner	CEO
Approved	See eQMS

1. Purpose

This policy establishes Tellu's overarching objectives and principles for socially and environmentally sustainable business conduct. It is intended to ensure that ethics, privacy and sustainability are integrated into Tellu's decisions, behaviour, products, services and internal processes.

The Sustainability Policy and Supplier and Partner Code of Conduct constitute Tellu's overarching framework for responsible business conduct and due diligence in accordance with the Norwegian Transparency Act, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights.

2. Scope

Tellu is a software company focused on welfare technology for the health sector. We design, operate and improve our products, services and internal processes in ways that protect people and data, respect human rights and reduce adverse environmental impacts throughout the lifecycle and value chain.

This policy applies to all employees, hired-in personnel, consultants and members of the Board of Directors, and to all Tellu products, services, operations and internal processes.

The policy also guides Tellu's relationships with suppliers, partners, sub-processors and other business relationships involved in the development, provision, integration, distribution, marketing, operation or support of products and services provided by or associated with Tellu. This includes organisations that provide products or services to Tellu and organisations that incorporate, integrate, distribute, resell or otherwise use Tellu products or services in their own products, services or solutions.

Detailed expectations for suppliers, partners, sub-processors and other relevant business relationships are established through the Supplier and Partner Code of Conduct, applicable contracts and other relevant Tellu requirements.

3. Responsibility

Role	Responsibility
Board of Directors	Approves the Sustainability Policy and Supplier and Partner Code of Conduct as Tellu's overarching framework for responsible business conduct and due diligence and receives the annual management review results.
CEO	Document owner and accountable for implementation. Authorised to establish, approve, maintain and revise supporting procedures, standards, guidelines, work instructions, forms and records.
CGRCO	Responsible for sustainability governance and management, including risk-based due diligence, supplier and partner evaluation and follow-up, measurement and reporting of sustainability objectives, operation

Role	Responsibility
	of the whistleblowing channel, and reporting of material matters through Tellu's governance processes.
Management, Service Owners and Process Owners	Implement sustainability measures in their areas, classify and assess significant changes, and ensure that necessary competence and resources are available.
All employees	Comply with this policy, complete assigned sustainability, privacy and ethics training, and raise concerns when something looks wrong.

4. References

- TLU-POL-007 HSE Policy
- TLU-POL-008 Employee Code of Conduct
- TLU-POL-012 Supplier and Partner Code of Conduct
- TLU-SOP-004 Supplier Management
- TLU-SOP-007 Resource Management Procedure
- TLU-SOP-008 Risk Management
- TLU-SOP-012 NC / CAPA
- TLU-SOP-015 Infrastructure & Work Environment
- TLU-SOP-016 Sustainability Due Diligence Procedure
- Norwegian Transparency Act
- Norwegian Working Environment Act
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Business Conduct
- United Nations Guiding Principles on Business and Human Rights
- United Nations Sustainable Development Goals

5. Definitions and abbreviations

Term	Definition
CGRCO	Chief Governance, Risk and Compliance Officer.
Due diligence	A risk-based process used to identify, prevent, mitigate and account for actual and potential adverse impacts.
eQMS	Tellu's electronic quality management system and source for the controlled version of this document.
SDG	United Nations Sustainable Development Goal.

6. Policy requirements

6.1 Sustainability objectives

The overall sustainability objective of Tellu is to build and evidence a culture in which ethics, privacy and sustainability are visible in our results and behaviour.

Our sustainability strategy is built on five behaviours that help us protect trust and create lasting impact:

Listen → Understand → Reflect → Influence → Reduce

This approach moves beyond compliance to culture-driven governance. It is how we make privacy, sustainability and ethics part of our DNA, not only in our services and products, but in every interaction.

Each objective below is measured annually. The CGRCO owns the measurement and reports results to the management review. Unless otherwise stated, reduction targets are measured against the preceding calendar year.

6.1.1 Listen

Create a safe environment where actively consuming information is the norm.

- In employee surveys, at least 90% of employees state that they collaborate well across the organisation.
- Recurrent incident rate is reduced by at least 50%.

6.1.2 Understand

Recognise meanings, intentions and norms, including what and why.

- In employee surveys, at least 90% of employees state that they understand how their own work affects sustainability.
- At least 80% of significant process changes are aligned with all relevant processes from operational, security and psychosocial perspectives.

6.1.3 Reflect

Stop and think carefully, adding a broader perspective and considering short- and long-term impact on colleagues, partners, customers, end users and future generations.

- 100% of significant service and product changes are assessed for safety, data protection, accessibility and AI impact on end users.
- At least 70% of significant service changes are assessed for ethical, human rights and environmental impact on customers and partners.

6.1.4 Influence

Be ambassadors for responsible practices, challenge constructively and guide with integrity.

- 100% of key suppliers and partners are annually evaluated on sustainability, privacy, human rights, decent working conditions and responsible business conduct.
- In employee surveys, at least 90% of employees state that they feel empowered to drive sustainability improvement.

6.1.5 Reduce

Limit the environmental footprint of our own operations and of the services we deliver.

- Environmental Lighthouse (Miljøfyrtårn) certification is maintained and the annual climate and environmental report is submitted by the applicable deadline.
- Environmental criteria are applied in the selection of hosting providers and hardware suppliers.

6.2 Human rights and decent working conditions

We carry out risk-based due diligence in accordance with the Norwegian Transparency Act, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights (UNGP).

In practice, this means that we:

- anchor responsible business conduct in this policy and in the Supplier and Partner Code of Conduct;
- maintain governance arrangements supporting responsible business conduct and due diligence;
- map actual and potential adverse impacts on human rights and decent working conditions in our own operations and supply chain at least annually and when significant changes may affect the risk picture;
- prioritise the most salient risks and agree measures with the supplier or partner concerned, with defined escalation and, where necessary, termination criteria;
- track the effect of the measures and provide for, or cooperate in, remediation where we have caused or contributed to an adverse impact; and
- communicate how the impacts are addressed.

An account of the due diligence under the Transparency Act is published on Tellu's website and updated by 30 June each year, signed in accordance with the Act. Requests for information under the Act are answered within a reasonable time and no later than three weeks after receipt.

6.3 Business ethics

We do not offer, give, request or accept bribes, facilitation payments or improper advantages of any kind, whether directly or through third parties. Gifts and hospitality shall be modest, transparent and in line with the Supplier and Partner Code of Conduct. Actual or potential conflicts of interest shall be declared to the employee's manager and recorded. We compete on the merits of our services and comply with competition law and applicable public procurement requirements.

6.4 Speaking up

Any employee, supplier, partner or other stakeholder can raise a concern about a breach of this policy, human rights or decent working conditions. Concerns can be raised through the line manager, the CGRCO or the whistleblowing channel, which may be used confidentially and anonymously. Retaliation against anyone who raises a concern in good faith is not accepted and is itself a breach of this policy.

6.5 Compliance and reporting

Management shall maintain an overview of applicable laws and regulations in a legal and regulatory register, which is reviewed at least annually.

The Supplier and Partner Code of Conduct shall set sustainability expectations in line with Tellu's objectives and contractual and regulatory requirements, and shall be accepted by all key suppliers and partners.

Any confirmed or suspected breach of this policy or basic human rights and decent working conditions shall be reported in accordance with the current incident reporting procedure or through the whistleblowing channel. Management evaluates Tellu's achievement of sustainability objectives at least annually. The management review results shall be presented to the Board. The CEO assesses the need for any other Board involvement in the sustainability work.

External reporting comprises, as a minimum, the annual climate and environmental report required by the Environmental Lighthouse certification, the account of due diligence under the Transparency Act, and responses to customer and public requests for sustainability information.

Breach of this policy by an employee may have consequences under the employment relationship. Breach by a supplier or partner is handled under the escalation and termination provisions of the relevant contract.

7. Records

Record	Storage	Retention
Approved policy and approval record	eQMS	According to the applicable retention settings in the software tools list.
Annual sustainability objective measurements and management review evidence	eQMS or designated management review repository	According to the applicable retention settings in the software tools list.
Annual due diligence account and supporting assessments	eQMS or designated sustainability repository	According to applicable legal and internal retention requirements.
Climate and environmental report	Designated sustainability repository and the company webpage	According to applicable certification and internal retention requirements.

8. Revision history

Version	Date	Description of change	Author
4.1	24 Sep 2026	Strengthened governance and regulatory alignment.	CGRCO
4.0	12 Aug 2026	Added objectives, due diligence and reporting requirements.	CGRCO

Version	Date	Description of change	Author
3.0	16 Jan 2026	Updated following Management Review.	CGRCO
2.0	23 Nov 2023	Updated following audit feedback and translated into English.	CGRCO
1.0	28 Jun 2023	Initial version.	CGRCO