

Transparency Act Report

Financial Year 2024

Bravo Norge AS · Company No. 912 235 157

Reporting period	1 January 2024 – 31 December 2024
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1. Introduction

Bravo Norge AS hereby publishes its disclosure under the Norwegian Transparency Act (Åpenhetsloven), which entered into force on 1 July 2022. This report describes Bravo Norge AS' due diligence assessments and measures concerning fundamental human rights and decent working conditions in our operations and supply chain for the financial year 2024.

The report is prepared in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct and the requirements of the Transparency Act. Bravo Norge AS is subject to the Act under § 3, with operating revenues of NOK 149,290,000 in 2024 — well above the threshold for «larger enterprise».

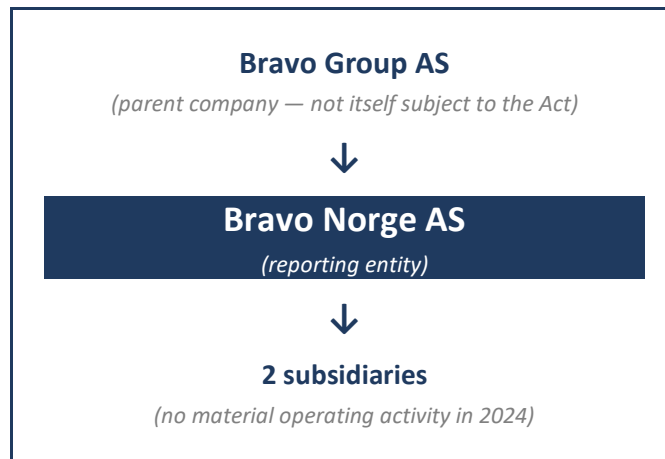
Bravo Norge AS is committed to ethical business practices and continuous improvement. This report covers our governance framework, supply chain structure, risk assessments, and measures considered or implemented to ensure compliance with the Act.

2. About Bravo Norge AS

Bravo Norge AS is a Norwegian limited liability company incorporated on 20 June 2013, with its head office at Grev Wedels Plass 9, 0151 Oslo. The company delivers audiovisual (AV) and IT solutions to enterprises, the hospitality and conference industry, and the public sector. Our activities include the design, supply, installation and operation of AV/IT solutions, as well as advisory services and equipment rental.

Bravo Norge AS is a wholly owned subsidiary of Bravo Group AS (company no. 818 149 522). Bravo Group AS is not itself subject to the Transparency Act. Bravo Norge AS has two subsidiaries, but neither had material operating activity during the financial year 2024 and they are not separately subject to the Transparency Act.



Corporate structure:

The company is certified to ISO 9001 (quality management) and Miljøfyrtårn (the Norwegian Eco-Lighthouse environmental certification). Operating revenues in 2024 were NOK 149,290,000.

3. Governance and Anchoring

Responsibility for the company's compliance with the Transparency Act is distributed as follows:

Role	Responsibility
The Board	Approves the due diligence assessment and Transparency Act report. Reviews material risks and overall measures.
CEO	Overall responsibility for the company's compliance with the Transparency Act. Ensures that due diligence work is integrated into the business operations.
Management Team	Operational responsibility for due diligence assessments and supplier follow-up. Ensures that the work is distributed across relevant functions in the organisation.

Tim Mikael Osen served as Managing Director throughout the 2024 reporting period and until 30 April 2026. Joachim Bremseth was appointed Managing Director effective 1 May 2026.

Bravo Norge AS has the following relevant governance documents and frameworks in place:

- ISO 9001 certification with documented processes for supplier evaluation, quality management and continuous improvement. ISO 9001 includes requirements for systematic supplier assessment and follow-up, and constitutes an established framework for due diligence work on the supplier side.
- Miljøfyrtårn (Eco-Lighthouse) certification with annual reporting on, among other things, procurement, supply chain and environmental impact.
- Employee handbook covering working conditions and fundamental rights for employees.



- HSE manual and HSE policy with procedures for risk assessment, incident registration and follow-up.
- Written whistleblowing procedure for matters of concern.
- Sustainability and CSR policy.

As part of Bravo's ongoing work with responsible business conduct, the company is considering the establishment of a Supplier Code of Conduct during 2026.

4. Our Supply Chain

4.1 Business model and procurement process

Bravo Norge AS is a project-oriented AV/IT supplier. Procurement decisions are typically made in collaboration with the customer: Bravo provides professional recommendations based on project requirements, which the customer endorses — or the customer has its own preferences based on overall business strategy, existing infrastructure or previous experience.

This means that in most cases Bravo has an active advisory role in product selection and, consequently, a real due diligence responsibility when making recommendations.

4.2 Procurement channels

The majority of Bravo's procurement is conducted through fully Norwegian AV/IT distributors. This is a deliberate choice that provides several advantages from a due diligence perspective: most of Bravo's distributors are themselves subject to the Transparency Act and conduct their own due diligence assessments with published reports; Norwegian counterparties facilitate communication and follow-up where concerns arise; and Norwegian distributors are subject to Norwegian employment law and supervisory regimes.

The only manufacturer Bravo purchases directly from is Crestron, through Crestron Norway — Crestron's Norwegian legal entity. In practice, therefore, all procurement is conducted through Norwegian companies.

Bravo partly relies on its distributors' own due diligence assessments as part of its own work, in line with the Norwegian Consumer Authority's guidance on referencing the assessments of other entities. Several of Bravo's largest distributors have published their own Transparency Act reports, based on the OECD's six steps, the UN Guiding Principles on Business and Human Rights (UNGPR), and industry standards such as the Responsible Business Alliance Code of Conduct.

4.3 Indirect supply chain

Although Bravo trades through Norwegian distributors, the supply chain extends to manufacturers and their sub-suppliers. As an AV/IT supplier, Bravo has products in its portfolio that are produced in countries classified as high-risk by the amfori BSCI Countries' Risk Classification, including China, Vietnam and Mexico.

5. Due Diligence Assessment for 2024

5.1 Methodology



Our due diligence follows the methodology in the OECD Due Diligence Guidance for Responsible Business Conduct. The 2024 assessment was conducted at category level, based on:

- amfori BSCI Countries' Risk Classification
- ITUC Global Rights Index
- US Department of Labor List of Goods Produced by Child Labor or Forced Labor
- Suppliers' own publicly available reporting, including published Transparency Act reports from Bravo's largest direct distributors
- Underlying documentation from the Miljøfyrtårn reporting for 2024
- Existing ISO 9001 processes for supplier follow-up



5.2 Identified risk

The risk assessment is summarised in the following overview:

Supplier category	Main production countries	Risk level	Basis
Norwegian AV/IT distributors (direct counterparty)	Norway	Low	Subject to Transparency Act themselves
AV control systems and audio/DSP	USA, Mexico, Germany, China	Low-Medium	Mature ESG programs
Displays and video conferencing equipment	South Korea, China, Vietnam, Taiwan	Medium	Listed companies with reporting
Network and IT infrastructure	Mexico, Vietnam, Malaysia, China	Medium	Major listed companies
Generic cables and accessories	Mainly China	High	Limited traceability
Subcontractors — installation and programming	Norway / Nordic region	Low	Norwegian subcontractors

5.3 Actual adverse impacts

During the reporting period, minor health and safety incidents were registered among Bravo Norge AS' own employees, with no serious injuries. The incidents are documented in the company's HSE system, root cause analyses were performed, and corrective measures were taken where relevant. No incidents resulted in material absence or reportable injuries.

No actual breaches of fundamental human rights or decent working conditions were identified at our direct suppliers during the reporting period.

5.4 Material risk

The most prominent material risk identified in our supply chain is related to:

- Generic cables and accessories produced in China, where traceability is limited and industry-known risks regarding working conditions are documented in international reports.
- The component-level of complex products such as displays and video conferencing equipment, where traceability to second- and third-tier suppliers is limited.
- Sub-suppliers to major manufacturers in China, Vietnam and Mexico, where human rights risks are well-known and documented in industry reports.

6. Measures and Expected Outcomes



6.1 Existing measures (as of 2024)

- Bravo procures mainly from fully Norwegian distributors that are themselves subject to the Transparency Act and publish their own due diligence assessments.
- Bravo prioritises suppliers with established ESG programs and public sustainability reporting.
- Bravo is ISO 9001-certified with documented processes for supplier evaluation and continuous improvement.
- Bravo is Miljøfyrtårn-certified with annual reporting on supply chain and procurement.
- HSE system with registration, follow-up and prevention of incidents among own employees.
- Established whistleblowing channel for matters of concern, available to employees.

Expected outcomes of existing measures: Risk reduction with direct suppliers through the choice of Norwegian/Nordic counterparties; lower probability of HSE incidents internally; early identification of concerns through the whistleblowing channel; systematic supplier assessment through ISO 9001 processes.

6.2 Measures under consideration (2026 and 2027)

As part of our ongoing work with responsible business conduct, and to address the material risks identified in section 5.4, Bravo is considering the following measures. Final prioritisation, scope and timeline will be determined based on ongoing assessment of risk, resources and effectiveness:

- Establishment of a Supplier Code of Conduct as a tool to set requirements for suppliers, particularly addressing the identified risk relating to generic cables/accessories from China and the component level of complex products.
- Inclusion of Transparency Act-related clauses in new framework agreements and larger procurements, where relevant and proportionate.
- Further development of existing ISO 9001 processes to include explicit assessment of human rights and working conditions as part of supplier evaluation.
- Annual update of the due diligence assessment and publication of the report by 30 June — in line with the requirements of the Transparency Act.

Bravo recognises that the company's influence is greatest where we have a direct customer relationship and independent product selection. For the significant part of the supply chain that runs through established Norwegian distributors, our work will continue to rely on the distributors' own due diligence assessments and quality systems.

7. Information Requests

Under § 6 of the Transparency Act, any person has the right to request information from Bravo Norge AS regarding how the company addresses actual and potential adverse impacts under § 4 of the Act. We respond to such requests within a reasonable time and no later than three weeks, as required by § 7.

Requests may be directed to:

- Email: support@bravosteps.com
- Contact person for the Transparency Act: Andreas Sitter
- Contact person email: andreas.sitter@bravosteps.com



8. Approval and Signature

This report has been considered and approved by the Board of Directors of Bravo Norge AS, and is signed in accordance with § 5 of the Transparency Act and § 3-5 of the Norwegian Accounting Act.

Oslo, 01.05.26 (updated)

Joachim Bremseth

Managing Director (CEO)

Ola Z. Sæverås

Chair of the Board

Trond Christensen

Board Member

