

29 Date 2026

Norway Transparency Act

Kyndryl's report for 2026

Introduction

The Norwegian Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

Kyndryl Norway AS and Kyndryl Services AS, being subject to the *Transparency Act*, are subsidiaries to Kyndryl Holding's, Inc (hereinafter "Kyndryl" and/or "we, "us"). This report covers the actions taken and outlines intent to take further action throughout Kyndryl's next reporting period, commencing 1 July 2026 ending 30 June 2027. It was jointly prepared by Kyndryl's corporate Global Citizenship and Sustainability, legal, and human resources teams based in the US and Norway.

Approach to Human Rights

Commitments to human rights and modern slavery are outlined in the [Global Human Rights and Modern Slavery Policy \(Policy\)](#), which applies to Kyndryl staff and suppliers. The Policy prohibits human rights abuses and addresses risks of forced labour, child labour, other forms of modern slavery, and complicity in supply chain abuses.

Governance of human rights and modern slavery is guided by our Policy. The Policy and global employment standards, in line with the [Kyndryl Code of Conduct \(Kyndryl Code\)](#), govern labour conditions, health and safety, community engagement, and child labour. We prohibit forced labour, bonded labour (including debt bondage), indentured or involuntary prison labour, and child labour, and comply with applicable laws relating to wages, working conditions, and employment standards.

Our approach aligns with international standards, including the International Bill of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines.

Kyndryl's global governance framework includes periodic review of human rights and modern slavery practices. Oversight is provided by the SVP of Global Citizenship and Sustainability, who reports to the Global Head of Corporate Affairs and chairs the Corporate Citizenship Executive Committee on a quarterly basis.

Structure and area of operations

Kyndryl is a leading provider of mission-critical enterprise technology services offering advisory, implementation and managed-service capabilities to thousands of customers in more than 60 countries. As the world's largest IT infrastructure services provider, the Company designs, builds, manages, and modernizes the complex information systems that the world depends on every day.

Kyndryl provides enterprise technology services across cloud, applications, infrastructure, digital workplace, security and network domains. The Company delivers office-based and technology-enabled services and does not manufacture physical products.

Global Procurement manages the sourcing of goods, services and intellectual property required to support business operations. A global structure is used to select suppliers and execute contracts and purchase orders.

Approximately 700 sourcing professionals support procurement activities across categories including information technology services, consulting, administrative services, marketing and communications, software, infrastructure services (including network, edge, hardware and maintenance), telecommunications, and facilities and logistics.

Supply chain social responsibility activities are managed through dedicated resources responsible for the development and implementation of policies and processes to identify and address risks in the supply chain.

Global Procurement operates in coordination with the Corporate Citizenship and Sustainability team, with dedicated resources for monitoring and managing direct suppliers. Procurement operations are geographically based in our countries of operation.

Kyndryl is an affiliate member of the Responsible Business Alliance (**RBA**) and has adopted the [RBA Code of Conduct](#) (**RBA Code**) in operations and for use in supplier management.

Suppliers are provided equal opportunity to compete for business, regardless of characteristics protected by applicable law.

Policies and adverse impact risk prevention due diligence

RBA Code principles are implemented across operations through the Kyndryl Global Employment Standards and the Kyndryl Code. The Global Employment Standards address labour conditions, including freely chosen employment, young workers, wages, benefits and working hours. The Kyndryl Code applies to directors, executive officers and employees, who complete training and confirm compliance annually. All Kyndryl employees receive annual training on the Kyndryl Code.

Supplier due diligence and human rights due diligence is aligned with the RBA Code. During new supplier onboarding, Kyndryl requires suppliers work toward and remain compliant with the RBA Code, as applicable to their industry.

Supplier commitments are formalized via either: (1) execution of an RBA Letter Agreement; (2) signing an ethics and integrity agreement letter; or (3) demonstration of a supplier code of conduct equivalent or exceeding RBA Code for the supplier industry. Procurement templates also require suppliers to review and agree to the Kyndryl Contractor Code of Conduct.

Kyndryl uses the RBA Risk Assessment Platform to identify and assess potentially high-risk suppliers and regions. The platform applies a risk-based methodology aligned with the RBA Code, covering labour, human rights, health and safety, environmental, and ethical factors.

Potentially high-risk regions and suppliers are tracked through the Platform along with RBA Code Supplier self-assessment questionnaires (**SAQs**). SAQs include but are not limited to, child labour, forced labour, working hours, wages and benefits, health and safety, and elements of human rights due diligence. RBA tools support Kyndryl's supplier due diligence framework and contribute to meeting expectations under *the Norway Transparency Act*. If a supplier violates commitments, Kyndryl can take corrective actions, including limiting or excluding such supplier from business opportunities.

We collaborate with industry initiatives and external partners to enhance shared visibility of supply-chain risks.

Actual adverse impact and risks of adverse impact

For Kyndryl, human rights and modern slavery risk is primarily associated with the extended upstream supply chain. Risk management is supported through semi-annual Enterprise Risk Management assessments and alignment with the RBA Code.

We share the responsibility to help ensure every person in our supply chain is treated with respect and dignity, and for protecting workers and the communities in which we operate.

The RBA Code is applied to first-tier suppliers and defines compliance expectations related to applicable laws, human rights, and remediation of adverse impacts. We expect suppliers to establish and maintain social responsibility, comply with applicable regulations, respect human rights, and remedy human rights and modern slavery impacts including impacts relating to fundamental human rights and decent working conditions.

Supplier expectations include labour standards addressing forced labour, child labour, working hours, wages and benefits, freedom of association, health and safety, environmental responsibility, and ethical conduct.

During the reporting period, Kyndryl performed semi-annual enterprise risk assessments including human rights and modern slavery. In 2025, the Kyndryl ERM assessment did not identify human rights, or modern slavery operational risks.

In fiscal year 2025, 95% of new suppliers signed a commitment letter, with the remaining 5% demonstrating compliance through an ethics and integrity letter or equivalent standards.

Modern Slavery Training

All Kyndryl employees and contractors have access to training modules supporting responsible supply chain practices. Modules are based on Kyndryl's corporate training framework, and include RBA Standards, Environmental Management, Health and Safety Management Systems, and Ethics and Responsible Business Practices. Training completion is tracked to help ensure global coverage, reinforce compliance, and strengthen Kyndryl responsible supply chain practices.

Reporting channels

Kyndryl employees, customers, suppliers, and others with whom we engage can report any suspected unlawful or unethical conduct or potential violations of the Kyndryl Code or policies through [Kyndryl Reporting Channels](#) that include an online web portal and geography specific hotlines.

Reports will be treated confidentially, and reporting may be done anonymously, where permitted by law. Reports will be promptly directed to the responsible investigatory function for review and investigation, where warranted. Kyndryl prohibits threats or acts of retaliation for (1) reporting in good faith potential wrongdoing or inappropriate behavior, (2) refusing to act in violation of the Kyndryl Code of Conduct, Kyndryl policies or law, or (3) cooperating with an investigation.


The Way Forward

As part of our plan to continuously improve our efforts to mitigate modern slavery, Kyndryl aligns human rights initiatives with the UN Sustainable Development Goals (UN SDGs) tracking progress over time. Going forward we will continue our work to improve the implementation of the requirements of the Transparency Act through opportunities to further embed into our operations processes consistent with the OECD guidelines for multinational enterprises' approach to due diligence. We will review our processes considering evolving best practices for similarly situated enterprises to further our goal of promoting human rights and decent working conditions through our relationships with entities in our supply chains.

Signed by:

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Emil Stampe, Chairman of the Board

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Karin Kaldvansvik Silnes, Board Member