

## Norway Transparency Act

### **Kyndryl's Business**

Kyndryl is a leading technology services company and the largest IT infrastructure services provider in the world, serving thousands of enterprise customers and with operations in over 60 countries. We have a long track record of helping enterprises navigate major technological changes, particularly by enabling our customers to focus on the core aspects of their businesses during these shifts while trusting us with their most critical systems. Our purpose is to design, build and manage secure and responsive private, public and multicloud environments to serve our customers' needs and accelerate their digital transformations. We offer services across domains such as cloud services, core enterprise and zCloud services, applications, data and artificial intelligence services, digital workplace services, security and resiliency services and network and edge services as we continue to support our customers through technological change. Read more about Kyndryl's organization and operations: [About us](#) & [Investor Relations](#).

### **Kyndryl's Approach to Human Rights**

As a newly independent company, Kyndryl continues to develop and execute its Environmental Social Governance (ESG) strategy, which encompasses our commitment to respecting human rights and decent working conditions. As part of our ongoing commitment to ensuring safe and sustainable operations, Kyndryl released its first [Human Rights Policy](#). Kyndryl looks to international standards for applicable guidance on our strategy and reporting, such as the Universal Declaration of Human Rights, and the following international human rights standards:

- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- Convention on the Elimination of All Forms of Discrimination against Women
- Convention on the Rights of the Child
- United Nations Declaration on Human Rights Defenders

Kyndryl commits to annually reviewing our approach and policies regarding human rights as guided by international standards and industry best practices as they evolve. As outlined in our Human Rights policy, Kyndryl has processes and procedures for employees and suppliers to anonymously raise human rights concerns or suspected unlawful or unethical situations through our reporting channels (see below) or report to the Kyndryl Procurement Ombudsman.

### **Kyndryl's Employment Policies**

Kyndryl's Global Employment Standards, embodied in internal corporate instructions, prohibits the following:

- Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons.
- Employment of persons under age 15, under the age for completing compulsory education or under the minimum age for employment, whichever is greatest.

- Violations of applicable wage and hour laws and regulations.
- Work hours that exceed the maximum hours of work prescribed by applicable laws and regulations.
- Discrimination in hiring, promotion, training, compensation of employees and employment practices on grounds of race, color, religion, creed, national origin, sex, gender, gender identity or expression, sexual orientation, pregnancy, caste, genetics, disability, age, or any other factors prohibited by local law or otherwise unrelated to Kyndryl's legitimate business interests.
- Sexual advances or comments, racial or religious slurs or jokes, or any other conduct, such as bullying, that creates or encourages an offensive or intimidating work environment. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

Kyndryl's Global Employment Standards acknowledge legal rights of its employees to form and join worker organizations of their own choosing, including labor organizations or trade unions, for purposes of bargaining collectively and to engage in peaceful assembly, or to refrain from forming and joining such organizations. Kyndryl provides employees with reasonable accommodation for religious practices and disabilities as required by law.

### **Kyndryl's Suppliers**

Kyndryl is [committed](#) to social and environmental responsibility in our operations and in our supply chain. We commit to proactively avoiding human rights abuses and voiding complicity in abuses by other participants in our supply chain. As of January 1, 2022, Kyndryl became a signatory of the [Responsible Business Alliance](#) (RBA). Under the RBA Code of Conduct Kyndryl requests suppliers to refrain from the direct or indirect use of forced labor or any forms of human trafficking and to verify/certify that their supply chains address these issues. Kyndryl commits to requesting its suppliers certify compliance with laws regarding slavery and human trafficking in alignment with local laws and the RBA Code of Conduct. Kyndryl reviews assessment information (SAQ, audit results, etc.) provided by suppliers on the [RBA online platform](#), and will require remediation of any negative impacts found.

### **Kyndryl's Reporting Channels**

Kyndryl makes available a Reporting Concerns web Portal and Hotline, through which individuals can report any concern relating to potential violation of the Kyndryl Code of Conduct or Kyndryl policies, or any other suspected unethical or unlawful conduct. All 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**

Going forward we will work to improve our 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.

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*Arne J Næprud*

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Arne J Næprud

Chairman of the Board, Kyndryl Norway AS

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*Emil Stampe*

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Emil Stampe

Board Member, Kyndryl Norway AS

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