

26 July 2025

Norway Transparency Act

Kyndryl's report for 2025

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 that Kyndryl has taken since its inception as an independent company and outlines Kyndryl's intent to take further action throughout Kyndryl's next reporting period, commencing 1 July 2025 ending 30 June 2026. It was jointly prepared by Kyndryl's corporate Global Citizenship and Sustainability, legal, and human resources teams based in the US and Norway.

Kyndryl's 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. A list of Kyndryl's subsidiaries as of 31 March 2025 report can be found [here](#). 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. 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 multi-cloud 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.

Within Kyndryl, Global Procurement has responsibility for purchases needed to run our business and enable the delivery of Kyndryl's products, software and services to our customers worldwide. To achieve consistency, Kyndryl has a global structure to select suppliers and commit Kyndryl funds via contracts and purchase orders.

Kyndryl has approximately 700 sourcing professionals and managers responsible for Kyndryl's global procurement operations dedicated to meeting the needs of Kyndryl's business and its customers in the countries in which we do business. These professionals work across the following broad categories:

- Software
- Technical products (for example, OEM hardware and field maintenance)
- Technical services (for example, business and technical human resources)
- Telecommunications (for example, mobile communications, office phones and teleconferencing)
- HR Services (for example, health & safety, benefits, incentives, insurance)
- Marketing (for example, advertising, events and printing)
- Facilities (for example, maintenance, food service and security)
- Travel (for example, airline fares, hotels and rental cars)

Kyndryl has prioritized taking responsible supply chain role and has allocated resources within its Global Procurement operation focused exclusively on the development and deployment of policies, practices and initiatives to identify and take measurable action on areas of concern in the supply chain. Global Procurement operation works in close collaboration with the Corporate Citizenship and Sustainability team responsible for environment, social and governance management and has dedicated resources toward monitoring and management of suppliers. Global Procurement operation is geographically distributed, which ensures supply chain social responsibility is integrated across the regional supplier base.

Read more about Kyndryl's organization and operations: [About us](#) & [Investor Relations](#).

Kyndryl's Approach to Human Rights

Kyndryl's [human rights policy](#) identifies our risk management approach and was developed with a human-centered approach to identify the most important ways technology affects people and how, as a technology services company, we can reduce any adverse effects.

As part of its human rights policy, Kyndryl has established policies to govern our corporate behavior around labor, health and safety, community engagement, and child labor. For example, Kyndryl will not use forced, bonded (including debt bondage), indentured labor or involuntary prison labor. Kyndryl will not use child labor. Kyndryl will comply with all applicable laws regarding minimum wages, safe working environments and other elements of employment. In line with Kyndryl's management of global employment standards and the [Kyndryl Code of Conduct](#), Kyndryl looks to international standards such as the [Universal Declaration of Human Rights](#), and we commit to reviewing our approach and policies as regulations and industry norms evolve.

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 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.

Actual adverse impact and risks of adverse impact

For large global companies like Kyndryl, the risk of potential adverse impacts on fundamental human rights and decent working conditions resides primarily in the extended upstream supply chain. We manage Kyndryl's ESG risk mitigation efforts through the corporate Enterprise Risk Management process.

As stated above, during 2024, we performed an enterprise risk assessment that included the Company's Environmental, Social, and Governance risks including human rights and modern slavery and found our ESG risk to have a low impact for Kyndryl.

Adverse impact risk prevention Due Diligence

As a technology services company, Kyndryl's success depends on our employees' and suppliers who support our operations, offerings, and services. We recognize that our services affect the stakeholders and communities in which we operate and serve. Additionally, our human rights approach prioritizes supply chain.

Attaining sustainable improvements in the supply chain is a long-term endeavor and recognizing these improvements is crucial to Kyndryl's long-term success. Kyndryl became a member of the RBA on 1 January 2022.

Kyndryl has communicated its requirement for suppliers to work toward, and remain compliant, with the RBA Code. These communications begin during the on-boarding process for new Kyndryl suppliers. After the RBA Code is provided, suppliers have an opportunity to identify any areas of their operations that may not conform to the RBA Code. This agreement links RBA Code compliance to the commercial terms and conditions applicable to conducting business with Kyndryl. If a supplier is found to be in violation of the RBA code, Kyndryl can take a variety of actions, including limiting or excluding suppliers from future business opportunities.

The RBA Code was updated to Version 8.0, effective 1 January 2024. In its section on "Labor," the RBA Code sets out the standard on "freely chosen employment":

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Participants shall maintain documentation on all leaving workers. Employers, agents and sub-agents may not hold or otherwise destroy, conceal or confiscate identity or immigration documents, such as government-issued identification, passports or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to

comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

The RBA Code principles and commitments are reinforced by Kyndryl's Global Employment Standard. Included within this Standard is Kyndryl's position on freely chosen employment, young workers, wages, benefits and working hours. Additional statements of our policies are included in the Kyndryl Code of Conduct. All Kyndryl employees receive annual training on the Kyndryl [Code of Conduct](#), affirming their commitment to the Guidelines. The Code of Conduct is Kyndryl's internal code of business conduct and ethics for Kyndryl's directors, executive officers and employees.

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. RBA Code Audits and Self-Assessment Questionnaires were tracked and monitored by Kyndryl to remediate and ensure compliance. We also assessed certain countries at high risk of noncompliance based on insights from an RBA risk analysis tool.

The Way Forward

As part of our plan to continuously improve our efforts to mitigate modern slavery, 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

Signed by:

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Kristin Haugen Selliken, Board Member