



Name	Policy Sustainable Business Practice and Transparency	
Approved	03.10.22 by the Board	1
Written	26.09.22 by Emilie Halland Braathen. Version 4: Updated 14.10.22	

# Policy for responsible business conduct and transparency

Advania Norway is part of Advania – one of the largest Nordic IT companies. We help our customers with products and services in the areas of IT outsourcing, ERP, process automation, contact centre, IT infrastructure and systems integration and data centre services.

On July 1st, 2022, the Norwegian Transparency Act (“Åpenhetsloven”) entered into force. Advania Norway is obliged to carry out due diligence assessments according to the OECD's model for responsible business conduct. This policy states how Advania Norway will work towards this.

## 1. Introduction

*Advania Norway* strives towards responsible business conduct that respects people, society, and the environment. This policy document, including our Code of Conduct, forms the foundation of our sustainability work.

This policy is based on basic human rights, the ILO's core conventions, Article 32 of the UN Convention on the Rights of the Child and national legislation for labour rights and covers the entire supply chain of *Advania Norway*.

The policy has been produced by the Ethics Committee in *Advania Norway*<sup>1</sup>. The committee have met four times – resulting in this document. Espen Hartz, CEO of Advania Norway has actively participated in the work.

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<sup>1</sup> The committee consists of Emilie Halland Braathen (Sustainability Manager), Trym Merg (Director Partner), Ella Lind (Bid Manager, Public), Ole-Anders Wilskow Jenssen (Director Public Sales), Lars Borgestrand (Director Infrastructure Public) and Henriette Ask (Bid Manager – New Sales).



Name	Policy Sustainable Business Practice and Transparency	
Approved	03.10.22 by the Board	2
Written	26.09.22 by Emilie Halland Braathen. Version 4: Updated 14.10.22	

## 1.1 Sustainability at Advania

*Advania Norway* considers responsible business conduct to be a prerequisite for sustainable development, meaning that today's generation gets their needs covered without compromising the ability of future generations to meet their own needs<sup>2</sup>. The UN Sustainable Development Goals (SDGs) are the world's joint action plan for sustainable development. Advania Norway report annually to the Nordic sustainability group on KPIs, and targets set in our sustainability report.<sup>3</sup> We, therefore, work actively with the SDGs. At Advania, we have chosen to focus on the SDGs that are social. Advania has a sustainability policy which focuses on three main areas: 1. Sustainable Advania, 2. Sustainable offerings and 3. Sustainable supply chain.

## 1.2 Never lose a customer

Many of our customers have high expectations for our work towards responsible business conduct. And trust us to deliver high-quality products made under compliant conditions. At Advania, sustainable business practices are a prerequisite for meeting customers' expectations and for building and maintaining their trust. Our motto is: "Never lose a customer". This is the driving force behind the decisions we make. We believe that IT is a people business. The foundation of our strategy is customer intimacy, which we achieve by:

- Creating value through partnerships.
- Providing standardized deliveries that are tailored to fit each customer's need.
- Making decisions based on the goal of never losing a customer.
- Encouraging employees to further develop their market-leading competence and confidence to make decisions close to the customer.

## 1.3 Membership in Ethical Trade Norway

*Advania Norway* became a member of Ethical Trade Norway in august 2022. Ethical Trade Norway is a membership organization and resource center for responsible business conduct. Their purpose is to promote responsible business practices in supply chains so that ethical trade is safeguarded.

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<sup>2</sup> The Brundtland commission, «Our Common Future», 1987.

<sup>3</sup> Advania's sustainability report: Read it [here](#).



Name	Policy Sustainable Business Practice and Transparency	
Approved	03.10.22 by the Board	3
Written	26.09.22 by Emilie Halland Braathen. Version 4: Updated 14.10.22	

Advania Norway will annually report openly on our work with ethical trade to Ethical Trade Norway.<sup>4</sup>

## 1.4 Due diligence assessments and expectations to suppliers and partners

As a member of Ethical Trade Norway Advania Norway commits to work actively with due diligence for responsible business conduct<sup>5</sup>. Due diligence is a risk-based approach to respect and safeguard people, society, and the environment in our own business and throughout the supply chain. We expect our suppliers and partners to follow the same approach.

Advania Norway wants to contribute to sustainable business conduct in close cooperation and dialogue with our suppliers and partners. To clarify what we expect from our suppliers, we have drawn up this policy. Advania Norway expects our suppliers to pass on these guidelines to their subcontractors and contribute to their compliance with them, in addition to working to comply with the requirements on their own behalf.

## 2. Requirements - own business

Advania Norway acknowledges that our business conduct can potentially have a negative impact on people, society and the environment. At the same time, we see the potential to contribute to positive development in the supply chain. With this in mind, we have compiled the following principles and criteria guiding our own business:

### 2.1 Due diligence

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<sup>4</sup> First time from 2023. Our first report will be available from June 2023.

<sup>5</sup> UN OHCHR, Guiding Principles on Business and Human Rights (UNGPR), 2011; OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.



Name	Policy Sustainable Business Practice and Transparency	
Approved	03.10.22 by the Board	4
Written	26.09.22 by Emilie Halland Braathen. Version 4: Updated 14.10.22	

*Advania Norway* shall conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify the potential negative impact on people, society and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our actions. If our activities are found to cause or contribute to a negative impact on people, society or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy.<sup>6</sup>

## 2.2 Responsible purchasing practices

*Advania Norway* considers responsible purchasing practices to be one of our most important tools for responsible business conduct. *Advania Norway* shall adapt our purchasing practices to strengthen, and not undermine, our suppliers' ability to deliver on our requirements related to people, society and the environment. We strive toward lasting supplier relationships with suppliers who show a particular willingness and ability to create positive developments in the supply chain.

## 2.3 Freedom of association and worker representation

*Avania Norway* supports the right to freedom of association and other forms of democratically elected worker representation. We shall involve worker representatives and other relevant stakeholders in our work with responsible business conduct.

## 2.4 Supplier development and partnership

In dialogue with suppliers, we will consider, if needed, to contribute with capacity building or resources that enable our suppliers to comply with *Advania Norway's* requirements related to responsible business conduct. This way we lay the foundation for collaboration with suppliers that show the willingness and ability to work on positive development for people, society and the environment in the supply chain.

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<sup>6</sup> OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.



Name	Policy Sustainable Business Practice and Transparency	
Approved	03.10.22 by the Board	5
Written	26.09.22 by Emilie Halland Braathen. Version 4: Updated 14.10.22	

## 2.5 Anti-corruption

*Advania Norway* including all employees, shall never offer or receive illegal or inappropriate monetary gifts or other remuneration to achieve private or business benefits in their own interest or in the interest of customers, agents or suppliers. *In Advania we have an anti-corruption policy.* This is described in our ethical guidelines in the *staff handbook* in *Simplyer* and *the Code of Conduct for employees*.<sup>7</sup>

## 2.6 Countries affected by trade boycott

*Advania Norway*, including all our suppliers and partners, shall avoid trading with partners that have activities in countries where a trade boycott is imposed by the UN and/or Norwegian Government authorities.

# 3. Requirements - conditions in the supply chain

We expect our suppliers and partners to work focused and systematically to comply with our guidelines for suppliers, hereunder our Code of Conduct, which covers fundamental requirements on human rights, labour rights, anti-corruption, and the environment.

## 3.1 Our suppliers shall:

- Follow our guidelines for suppliers, hereunder the Code of Conduct for Suppliers.<sup>8</sup>
- Conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify the potential negative impact on people, society and the environment and to stop, prevent and reduce such impact. The measures put in place must be monitored and their effect evaluated. The measures taken must be communicated to those affected by your actions. If the supplier is responsible for the negative impact/damage, they are responsible for providing remedy.<sup>9</sup>

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<sup>7</sup> Advania's Code of Conduct for employees, 2022. Read it [here](#).

<sup>8</sup> Advania's Code of Conduct for Suppliers, 2022. Read it [here](#).

<sup>9</sup> OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.



Name	Policy Sustainable Business Practice and Transparency	
Approved	03.10.22 by the Board	6
Written	26.09.22 by Emilie Halland Braathen. Version 4: Updated 14.10.22	

- Show willingness and ability to continuous improvement for people, society and the environment through collaboration.
- At the request of *Advania Norway* be able to document how they, and potential subcontractors, work to comply with the guidelines.

### 3.2 If the supplier does not meet our requirements:

If the supplier, after several requests by *Advania Norway*, does not show the willingness or ability to comply with the guidelines for suppliers, the contract may be cancelled.

## 4. Principles for responsible business conduct (Code of Conduct)

These principles for responsible business conduct are based on UN and ILO conventions and provide minimum, not maximum standards. The relevant legal framework at the place of production shall be respected. Where national laws and regulations address the same subjects as these guidelines, the most stringent shall apply.

*Advania* has adopted principles for sustainable business practices (Code of Conduct) for employees<sup>10</sup> and suppliers<sup>11</sup>. We, therefore, do not reproduce the content of these in this policy. These are publicly and openly available on our website so that everyone can read them. Our Code of Conduct is based on the principles of sustainable business practices and on UN and ILO conventions and sets out minimum and not maximum standards. The legislation at the place of production must be respected. Where national laws and regulations cover the same subject as these guidelines, the highest standard shall apply.

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<sup>10</sup> Advania's Code of Conduct for employees, 2022. Read it [here](#).

<sup>11</sup> Advania's Code of Conduct for Suppliers, 2022. Read it [here](#).