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	Approved	03.10.22 by the Board. Last approved: 23.03.23	1
	Written	26.09.22 by Emilie Halland Braathen.	
	Updated	17.03.23. Version 4	

Policy for responsible business conduct and transparency

Advania Norway is part of Avania – 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*¹. The committee have met four times – resulting in this document. Espen Hartz, CEO of Advania Norway has actively participated in the work.

¹ 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).

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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 needs². 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.³ 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.

² The Brundtland commission, «Our Common Future», 1987.

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

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

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 conduct⁵. 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

⁴ First time from 2023. Our first report will be available from June 2023.

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

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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.⁶

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.

⁶ OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

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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 *Simployer* and *the Code of Conduct for employees*.⁷

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.⁸
- 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

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

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

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communicated to those affected by your actions. If the supplier is responsible for the negative impact/damage, they are responsible for providing remedy.⁹

- 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.

1. Forced and compulsory labour (ILO Conventions Nos. 29 and 105)


1.1. There shall be no forced, bonded or involuntary prison labour.

1.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

2.1. Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.

⁹ OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

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2.2 Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

3. Child Labour (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)

3.1. The minimum age for workers shall not be less than 15 and comply with the national minimum age for employment, or; the age of completion of compulsory education, whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.

3.3. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.

3.4. No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.


3.5. Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

4. Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1. There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2. Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.

5. Harsh or Inhumane Treatment (UN Covenant on Civil and Political Rights, Art. 7)

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5.1. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)

6.1. The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.4. Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7. Wages (ILO Convention No. 131)

7.1. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.


7.2. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3. Deductions from wages as a disciplinary measure shall not be permitted.

8. Working Hours (ILO Convention No. 1 and 14)

8.1. Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.

8.2. Workers shall be provided with at least one day off for every 7 day period

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8.3. Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.

8.4. Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

9. Regular Employment (ILO Convention No. 95, 158, 175, 177 and 181)

9.1. Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.

9.2. All workers are entitled to a contract of employment in a language they understand.

9.3. The duration and content of apprenticeship programmes shall be clearly defined.

10. Marginalized Populations (UN Covenant on Civil and Political Rights, art. 1 and 2)


10.1. Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

11. Environment

11.1. Negative impact on the environment shall be reduced throughout the value chain. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.

11.2. National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained.

12. Corruption

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12.1. Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

13. Animal welfare

13.1 Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.

13.2 National and international animal welfare legislation and regulations shall be respected.