

# Policy for responsible business conduct and transparency

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Document Owner:  
Turi Pettersen, Chief  
Sustainability Officer



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## Introduction

Advania Norway is part of Advania Group – a large Nordic IT company. We help our customers with various IT products and 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 works with compliance in accordance with the law.

This policy forms an additional policy applicable to Advania Norway and our business partners considering the Norwegian Transparency Act and our membership in Ethical Trade Norway.

## Scope

This policy supplements Advania Norway's existing policies, and reflects our commitment to the Norwegian Transparency Act and Ethical Trade Norway, and must be included in all supplier contracts. Advania Norway strives for responsible business conduct that respects people, society, and the environment. This policy document, along with the Advania Group's Sustainability Policy and Internal and External 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 labor rights and covers Advania Norway's entire supply chain.

The policy has been updated by the Sustainability Director at Advania Norway and approved by the Advania Norway Board.

## Responsibilities: Own Business and Our Business Partners

As a member of Ethical Trade Norway, Advania Norway commits to actively work with due diligence for responsible business conduct. 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 aims to contribute to sustainable business conduct through close cooperation and dialogue with our suppliers and partners. To clarify our expectations, we have drawn up this policy. Advania Norway expects our suppliers to pass on these guidelines to their subcontractors and ensure compliance, in addition to working to comply with the requirements on their own behalf.

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

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.

## Due Diligence

Advania Norway conducts due diligence for responsible business across our value chain. This involves performing risk assessments to identify potential negative impacts on people, society, and the environment, and taking measures to stop, prevent, reduce and remediate such impacts. The measures put in place are monitored, their effects evaluated, and 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 cease the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy.

## Responsible Purchasing Practices

Advania Norway considers responsible purchasing practices to be one of our most important tools for responsible business conduct. We 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.

### Freedom of Association and Worker Representation

Advania 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, and expect our business partners to do the same.

### Supplier Development and Partnership

In dialogue with suppliers, we will consider, if needed, contributing 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.

### Anti-Corruption

Advania Norway, including all employees, suppliers, and partners, 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 described in our ethical guidelines in the staff handbook in Simployer and the Code of Conduct for employees.

### 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.

### Forced and Compulsory Labor (ILO Conventions Nos. 29 and 105)

There shall be no forced, bonded, or involuntary prison labor. 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.

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

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

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

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 is higher. If the local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply. There shall be no recruitment of child labor defined as any work performed by a child younger than the age(s) specified above. No person under the age of 18 shall be engaged in labor that is hazardous to their health, safety, or morals, including night work. Policies and procedures for the remediation of child labor 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.



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

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

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

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.

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

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 minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and adequately ventilated, and shall have access to clean toilet facilities and potable water.

### Wages (ILO Convention No. 131)

Wages and benefits paid for a standard working week shall at a 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. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payment before entering employment. Deductions from wages as a disciplinary measure shall not be permitted.

### Working Hours (ILO Convention Nos. 1 and 14)

Working hours shall comply with national laws and benchmark industry standards, and not exceed prevailing international standards. Weekly working hours should not regularly exceed 48 hours. Workers shall be provided with at least one day off for every 7-day period. Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e., the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement. Workers shall always receive overtime pay for all hours worked over and above the normal working hours, at a minimum in accordance with relevant legislation.

### Regular Employment (ILO Conventions Nos. 95, 158, 175, 177, and 181)

Obligations to employees under international conventions, national law, and regulations concerning regular employment shall not be avoided using short-term contracting (such as contract labor, casual labor, or day labor), sub-contractors, or other labor relationships. All workers are entitled to a contract of employment in a language they understand. The duration and content of apprenticeship programs shall be clearly defined.



## Marginalized Populations (UN Covenant on Civil and Political Rights, Arts. 1 and 2)

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.

## Environment

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

## Animal Welfare

Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals. National and international animal welfare legislation and regulations shall be respected.

## Supplier-Specific Requirements

Aligned with our “Minimum requirements for suppliers”:

- The supplier has signed and adheres to our ethical guidelines (Code of Conduct for Suppliers) and this policy, or communicated their own guidelines to us in writing which as a minimum adheres to the same standards as Advania's CoCs.
- The supplier shall provide a contact person for the follow-up of our ethical guidelines for suppliers.
- The supplier can demonstrate a system for monitoring the ethical guidelines for suppliers.
- The supplier conducts due diligence for responsible business conduct, which involves conducting risk assessments to identify potential negative impacts on people, society, and the environment, and taking measures to stop, prevent, and reduce such impacts. The measures must be monitored, their effects evaluated and communicated to those affected by the supplier's actions. If the supplier is responsible for the negative impact/damage, they are responsible for providing remedy.
- The supplier shows willingness and ability to continuously improve for people, society, and the environment through collaboration.
- Traceability: The supplier has an overview of and shares information about where different parts of the product are produced and where the raw materials come from (must be specified).
- Access: The supplier provides Advania access to the production site and associated buildings such as canteens and dormitories.
- At the request of Advania Norway, the supplier must be able to document how they, and potential subcontractors, work to comply with the guidelines.

## Consequences for Non-Compliance

- 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.





## Change History

Version	Date	Author	Updates
4	17.03.2023	Emilie Halland Braathen	
5	24.03.2025	Turi Pettersen	Inclusion of clearer link to Supplier Code of Conduct, plus link to minimum requirements to suppliers

