

Reporting year 2022

Transparency Act statement

Due diligence assessments for sustainable business practices

ORANGE BUSINESS NORWAY AS

| | |
|---------------|---------------------------------------|
| Established | 01.09.1989 |
| Address | Lørenfaret 1E Økern Portal, 0585 Oslo |
| NACE-Industry | 61.100 Cable-based telecommunications |
| Employees | 9 |
| Revenue | 89 million NOK |
| Contact | Sinue de la Torre |

About us

Orange Business is the Orange Group entity dedicated to businesses and organizations. Our unique history as a telco operator and now an IT services company enables us to support the sustainable digital transformation of enterprise businesses worldwide.

In Norway, we operate under Orange Business Norway AS and are a well-known provider of advanced IT services. We focus on delivering solutions that assist businesses in enhancing their competitiveness. Our core aim is to offer innovative, customized solutions that support our clients in achieving their business goals. As part of the larger Orange Business group, which includes various companies offering technological solutions to businesses globally, Orange Business Norway operates from offices in Oslo. In the organization, the role of CEO is held by Simon James Ranyard.

Responsible business conduct is core to Orange Business Group. This includes systematic efforts to identify, prevent, mitigate, and report on how we address the risk of negative impacts on people, society, and the environment. We therefore welcome the Transparency Act as we believe it will drive further measures linked to human rights and decent working conditions.

Orange Business Norway AS (the “Company”) is 100% owned by Orange Business Services Participations SA, a French holding company. The ultimate parent is Orange SA in France.

Method for due diligence assessments

Internal assessments and board endorsement

Orange Business Norway AS is subject to the Transparency Act and is obligated to account for our due diligence assessments. Orange already performs due diligence assessments at the Group level. Our handling of the Transparency Act is therefore an expansion to include more of Orange Business Norway AS' smaller and local suppliers. Our assessment begins with an internal evaluation of the risk of violations of fundamental human rights and decent working conditions. This is done by evaluating and prioritizing risk based on severity and likelihood. The work with the Transparency Act is anchored in the management in accordance with OECD guidelines. Responsibility for the implementation and follow-up of the Transparency Act has been assigned to Regional Accounting Manager Benelux and the Nordic Region, Sinue de la Torre.

Supplier survey

In our commitment to maintaining up-to-date information regarding our suppliers' conditions, we have partnered with Factlines. Their software and methodology are helpful in assessing suppliers, conducting risk evaluations, and documenting subsequent actions. Additionally, we engaged external advisors from Aider to assist us in our due diligence assessments.

Orange Business Norway AS conducts information gathering exercises with our suppliers through self-reporting. This survey encompasses our direct suppliers, adhering to the principles outlined by UN Global Compact. It includes inquiries related to fundamental human rights and decent working conditions, in line with OECD guidelines. The questionnaire covers various aspects, including:

- Corporate responsibility, strategy, and guidelines

- Supply chain oversight, insight, and control
- Risk assessment and due diligence processes
- Evaluation of country-specific risks
- Management systems
- Conditions and rights within the workforce
- Indigenous peoples' concerns
- Conflict mineral sourcing
- Anti-corruption measures

For assessing risk in production countries, we rely on guidelines provided by the International Trade Union Confederation (ITUC) regarding labor rights, as well as Transparency International's corruption index.

The survey results serve as the foundation for further actions and follow-ups. Should self-reported data or other indicators signal risks, we initiate discussions with the respective supplier. Our primary aim is to prevent and mitigate adverse consequences through effective collaboration with our suppliers.

Findings from due diligence assessment

The Company's inherent industry risk is assessed in relation to The Norwegian Agency for Public and Financial Management's (DFØ) high-risk list. DFØ has identified inherent risks in dealing with ICT products, primarily linked to complex and globalized supply chains. The rapid technological advancements and demand for ICT components often involve extensive networks of suppliers, contributing to challenges in monitoring and enforcing ethical standards. The high-risk nature of this industry stems from the prevalence of labor-intensive manufacturing processes in certain regions where labor rights may be inadequately protected. Additionally, the extraction of raw materials for ICT products, such as rare minerals, may involve environmental degradation and human rights concerns in certain areas. The reliance

on subcontractors and sub-suppliers further increases the complexity of supply chain management, introducing uncertainties regarding the practices of downstream entities.

This inherent risk highlights the importance of our commitment to addressing supply chain concerns, working collaboratively with suppliers to foster improved ethical practices. Through enhanced communication, transparency, and collaboration, we aim to ensure adherence to our ethical standards.

Discovered actual negative consequences for fundamental human rights or decent working conditions

The survey findings indicate that responding suppliers fall within the low-risk category according to Factlines' risk measurement classification. Nevertheless, we have identified one specific case of actual negative consequences. In this particular instance, one supplier reported a breach of ethical guidelines among their sub-suppliers within the past 12 months.

Discovered potential negative consequences for fundamental human rights or decent working conditions

Certain suppliers have not yet implemented specified requirements for labor rights, human rights, environmental standards, and anti-corruption measures among their own suppliers. Despite operating within a low-risk sector, this poses potential concerns. Some of our other suppliers indicate in their answers that achieving a comprehensive supply chain overview is inherently challenging in the sectors where they operate.

Planned measures

As part of our measures, we will seek additional information regarding the incident involving the supplier who reported the breach of ethical guidelines. Going forward, we will follow up with our suppliers and ask the ones that lack a supplier code of conduct to implement one. To address the inherent risk of a lacking supply chain overview, we will continue to adhere to the standards set by Orange Group.

We also plan on expanding our due diligence assessment moving forward and follow up with more suppliers to get an even better overview of the risks in our supply chain. Additionally, we have established a channel (<https://orange.integrityline.org/index.php>) to answer questions related to our own and suppliers' conditions under the Transparency Act §6.

Board of Directors:

Simon Ranyard
Simon Ranyard

Svein Rasch
Svein Rasch

Gabriele Weisselberg
Gabriele Weisselberg

Oslo, 20 December 2023