

Reporting year 2024

Transparency Act statement

Due diligence assessments for sustainable business practices

ORANGE BUSINESS NORWAY AS

Established	01.09.1989
Address	Lørenfareet 1E Økern Portal, 0585 Oslo
NACE-Industry	61.100 Cable-based telecommunications
Employees	9
Revenue	100 MNOK

About us

Orange Business Norway AS is a leading provider of advanced IT services, dedicated to helping businesses enhance their competitiveness. Our core mission is to deliver innovative, customized solutions that support our clients in achieving their business goals.

As part of the larger Orange Group, which encompasses various companies offering technological solutions globally, Orange Business Norway operates from its offices in Oslo, serving the Norwegian market. This due diligence assessment pertains specifically to Orange Business Norway AS. The organization is led by CEO Simon James Ranyard.

Orange's Commitment to Human Rights and Decent Working Conditions

Our primary policies governing our commitment to human rights and decent working conditions are implemented at the group level. These include our Group Code of Ethics and our Responsible Purchasing Commitments. By embedding these principles and practices into our operations, we at Orange strive to ensure that our entire value chain supports and promotes human rights and decent working conditions. We set high ethical standards for all stakeholders and actively encourage adherence to these standards. This includes focusing on:

- 1. Respect and Integrity**
- 2. Training and awareness of employees and suppliers**
- 3. Regular assessments by Compliance Officers**
- 5. Accountability through whistleblowing mechanisms and reporting**
- 6. Responsible procurement and supplier requirements**

For more information about our Group level policies, please visit our [CSR media library](#).

Due diligence assessments

Orange Global Due Diligence

Orange Group is dedicated to continuous improvement, ensuring that our suppliers adhere to the highest standards of social responsibility and ethical conduct. The Group has amongst other things implemented a strong set of internal guidelines and policies, structured internal trainings, created governance bodies for the purpose of following up CSR topics as well as helped start an organization (The Joint Alliance for CSR) to ensure effectiveness in audit results pooling for the different telecommunication operators involved in the organization.

For more information about the Group's CSR work related to fundamental human rights, please see our [statement on modern slavery and forced labour](#).

Orange Business Norway Due Diligence

To ensure compliance with the Transparency Act and to supplement Orange Group's due diligence efforts, Orange Business Norway AS conducted its own due diligence on local and smaller suppliers not covered by the Group's assessments. This work, anchored in the management and aligned with OECD guidelines, was overseen by the Regional Accounting Manager for Benelux and the Nordic Region, Sinue de la Torre.

Given the nature of our Norwegian suppliers, which primarily provide services such as accounting, insurance, and other business services, we assess the risk of negative consequences to be low.

For the previous reporting period we selected 13 Norwegian suppliers for a detailed assessment. The spend threshold was set to 90,000 NOK. As we were unable to assess all thirteen suppliers initially, this work was continued into 2024.

All suppliers have been screened against The Norwegian Agency for Public and Financial Management's (DFØ) high-risk list- This resulted in the inclusion of three suppliers below the spend threshold due to the nature of their industries, specifically those providing computers and office supplies.

For certain suppliers, we relied on existing due diligence documentation to inform our assessment. In these cases, it was not necessary to request a separate response through the Factlines survey. Instead, we reviewed publicly available Transparency Act statements, UNGP Communications on Progress, or other relevant due diligence reports provided by the suppliers themselves.

Supplier survey

To gather up-to-date information about our suppliers' conditions, we conducted a supplier survey specifically targeting our suppliers in Norway through the system Factlines. The survey included our direct suppliers and contained questions on fundamental human rights and decent working conditions aligned with OECD guidelines and the principles of the UN Global Compact.

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.

The survey findings indicate that the responding suppliers fall within the low-risk category according to Factlines' risk measurement classification. However, one specific instance of actual negative consequences was identified: a supplier reported a breach of ethical guidelines by one of their sub-suppliers within the past 12 months. We addressed this issue directly with the supplier, a major telecom provider. While any breach of ethical guidelines is a serious matter, this case also reflects the supplier's strong routines for monitoring and reporting. Given

the company’s global operations and extensive supply chain, the ability to detect and disclose such incidents is an indication of transparency and robust internal controls.

Despite the overall low-risk categorization, there are areas of potential concern. Some suppliers have not yet implemented the specified requirements for labor rights, human rights, and anti-corruption measures among their own suppliers. Additionally, several suppliers indicated that achieving a comprehensive overview of their supply chain is inherently challenging due to the complexity of their operational sectors. This includes uncertainties regarding the production of key components.

Planned measures

To address the inherent risk of limited supply chain oversight, we will continue to adhere to the standards set by Orange Group. These standards provide a solid foundation for responsible sourcing and help ensure alignment across all subsidiaries and partners. As we further develop our approach, we aim to gradually expand our oversight and, where our due diligence efforts indicate it is necessary, take proactive steps to mitigate supply chain risks.

The current number of measures in place remains relatively limited. This is primarily due to the nature of our operations, which rely on long-standing supplier relationships and a shared commitment to ethical standards. In many cases, suppliers are assessed through group-level initiatives and frameworks, reducing the need for local, standalone measures.

Oslo, 28th of May 2025

Simon Ranyard
Simon Ranyard
General Manager/
Member of the board

Svein Rasch
Svein Rasch
Chairman of the Board

Gabriele Weisselberg
Gabriele Weisselberg
Member of the board