



# Corporate Communications: Human Rights and Transparency Act statement

**Published date: 30 June 2024**

## About the Transparency Act

On 1 July 2022, the Norwegian Transparency Act came into effect. The Act aims to ensure that enterprises respect human rights and maintain decent working conditions in connection in their production and services. It also grants the public access to information on how enterprises manage negative impacts in these areas.

Corporate Communications is committed to comply with the requirements set out in the Transparency Act. The information in this document refers to the period from 1 July 2023 to 30 June 2024.

## Policy for handling requests of information

For questions about this document or its contents, please contact Corporate Communications' Managing Partner: Håkon Rønning: [Hakon.rønning@corpcom.no](mailto:Hakon.rønning@corpcom.no).

## About Corporate Communications

Corporate Communications AS is a Norwegian communications consultancy founded in 2011. Our main activity is to provide communications advise to businesses in Norway and abroad. We develop and implement communications strategies, plans, and concrete measures anchored in an enterprise's overall strategy and goals. Our purpose is to empower businesses and executives to accomplish their aims through building understanding and engagement with the outside world – particularly when interacting with stakeholders, such as the media, politicians, and investors.

As a communications agency, Corporate Communications operates in a wide range of sectors and industries. We specialise in financial communications, crisis and emergency preparedness, digital communications, sustainability and ESG, media consulting, and leadership and change communication.

Our 32 advisors have backgrounds from business, organisations, politics, and journalism.



## Guidelines and routines

Corporate Communications exists to create value for our clients. It is essential that this work is done within clear ethical guidelines. Our ethical guidelines and routines are intended to make sure that everyone working for or on behalf of our firm understands what is expected of them and knows how to report suspected misconduct.

### **Code of Conduct**

The Code of Conduct (CoC) is our primary set of ethical guidelines, outlining expected employee conduct. The CoC has been developed to ensure that our company's mission, values, and ethical standards are complied with by everyone working for Corporate Communications.

The CoC is divided into general principles for the individual employee and more detailed guidelines in specific areas. This includes information such as what clients we work or will not work with, rules for securities trading and information handling and our whistleblowing policy.

New employees receive the CoC as part of the onboarding process. The CoC is also available through our shared internal SharePoint site, and a summary is published on Corporate Communication's website for external parties. Our Managing Partner(s) is responsible for the enforcement of the CoC, while each employee is responsible for respecting and acting in accordance with the CoC at all times.

The CoC was approved by the Partnership 14 December 2022 and was updated in 2024 to include information about anti-corruption, bribery and guidelines for the use of artificial intelligence. A majority (75%) of our employees were informed about the updates to the CoC in a meeting in June 2024, the rest (25%) will receive information during 2024.

### **Whistleblowing policy**

Our whistleblowing policy is outlined in the CoC. The policy encourages everyone to report any improper conduct and provides a clear overview of how to report concerns, whom to report them to, and how the process will unfold. Reporting can either be made in writing or directly to the Managing Partner(s), Chairman of the Board, or to Corporate Communications' safety representative. The reporting must be factually justified. The reporter has the right to stay anonymous. After the report has been made, necessary follow-up should happen within 7 days (1 week), and feedback will be given to the whistleblower in due time.



### **Supplier Code of Conduct**

At Corporate Communications we expect our suppliers to adhere to the same high ethical standards as we live by ourselves. This includes ensuring the well-being of workers, taking environmental responsibility, and ensure good governance. Our suppliers should conduct their business with integrity, honesty, and transparency, and avoid any form of human rights breaches, unsafe working conditions, corruption, or other unethical business practices.

In 2023, we developed a Supplier Code of Conduct (SCoC), which outlines the principles and expectations that we require our suppliers and business partners to uphold. The SCoC was approved by the Managing Partners and Corporate Communications' Board of Directors 24 January 2024 and is available on our website.

The SCoC has been communicated per email to relevant suppliers and business partners in 2024.

## **Risk of negative consequences**

Corporate Communications is based in Oslo, and most of our operations take place in Norway where the risk of human rights breaches is perceived to be low<sup>1</sup> and where decent working conditions are mandated and protected by national laws such as the Norwegian Working Environment Act. Main risks of adverse impacts on human rights and decent working conditions are therefore perceived to be linked to our suppliers and business partners with international presence or global value chains.

### **Supplier/business partner evaluation**

Corporate Communication relies on several suppliers and business partners in our day-to-day work. We prioritise partnerships with suppliers who share our values and are dedicated to upholding principles of ethical conduct.

To mitigate risks, we began an extensive due diligence process in 2023 to identify and assess both actual and potential adverse impacts on fundamental human rights and decent working conditions in our value chain, and this work have continued in 2024. Our approach includes listing all our suppliers and business partners and sorting them based on contract value, criticality, size, industry and country of operation.

As per June 2024, we had approximately 180 suppliers and business partners, of which 30 had a contract value above NOK 100.000. The most common type of supplier/business partner includes suppliers of catering/food delivery, travel/transportation, design/print material, photography/film making, course/conference partners, and cleaning services.

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<sup>1</sup> According to the Global Economy's Human Rights and Rule of Law Indicator and the ITUC Global Rights Index.



Two main risk areas are specifically looked at in the supplier risk assessment: industry and country of operation. Industries that are typically flagged include cleaning services, IT equipment and support, catering/food delivery, and transportation, as these industries typically have a higher risk when it comes to overtime work and low wages.

A majority (95%) of our suppliers / business partners only operate in Norway, but some of our suppliers have sub-suppliers or offices in countries where the risk of human rights breaches is significantly higher. After a thorough assessment, we have not identified any human rights breaches linked to our supply chain in the reporting period, and thus, no contracts with suppliers have been terminated or discontinued. We have not received any complaints/reports of concern regarding our own activities in the reporting period.

Key Performance Indicator (KPI)	1 July 2023 – 30 June 2024
Number of suppliers that were assessed in the reporting period	177
Number of contracts terminated/discontinued in the reporting period due to perceived risk of human rights breaches	0
Number of physical audits conducted in the reporting period	0
Number of significant instances of non-compliance with laws and regulations	0

## Going forward

We will continue to monitor our suppliers and business partners regarding ethical business conduct. Relevant suppliers will be asked to sign the Supplier Code of Conduct, stating their commitment to ethical business conduct, and high-risk suppliers shall be asked to provide more documentation to prove that their operations are based on sound business practices. The need for physical audits will be determined on a case-by-case basis.

**This report has been approved by Corporate Communications Board of Directors:**

Geir Bjørlo, Chairman (s.)

Julie Skogheim, Board Member (s.)