

Corporate Communications: Human Rights and Transparency Act Report

About the Transparency Act

On 1 July 2022, the Norwegian Transparency Act came into effect. The Act promotes enterprises' respect for human rights and decent working conditions in connection with the production of goods and the provision of services. It also ensures the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

Policy for handling requests of information

For questions about this document or its contents, please contact Corporate Communications' Managing Partner(s): Kaia Tetlie: Kaia.tetlie@corpcom.no and/or Håkon Rønning: Håkon.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 drive businesses and executives to accomplish their aims through building understanding and engagement with the outside world – particularly when interacting with stakeholders who may be unfamiliar to them, 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 crisis and emergency preparedness, financial communications, digital communications, sustainability and ESG, media consulting, and leadership and change communication. Our 31 advisors have backgrounds from business, organisations, politics, and journalism.



Guidelines and routines

Corporate Communications' ethical guidelines and routines is intended to make sure that everyone working for or on behalf of our firm are aware of what is expected of them, and how to report suspected misconduct.

Code of Conduct

The Code of Conduct (CoC) is our main ethical guidelines and contains information about employee conduct. The CoC has been developed to secure 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 certain areas. This includes for instance information relating to the types of clients we work or will not work for, rules for securities trading and information handling, our whistleblowing policy, and more.

The CoC is available on our external website as well as through our shared internal SharePoint site. The CoC has been communicated to all employees. 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 current CoC was approved by the Partnership on December 14, 2022.

Whistleblowing policy

A whistleblowing policy is outlined in the CoC. The policy 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, and the reporting must be factually justified. Everyone has a right to report any suspicion of misconduct and 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 whistle-blower 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 on January 24, 2024. Next steps include publishing the SCoC on our website and communicate the SCoC to all new and existing suppliers.

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 and where national laws (such as the Norwegian Working Environment Act) sets out requirement for decent working conditions. Main risks 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, and we prioritise partnerships with suppliers who share our values and are dedicated to upholding principles of ethical business conduct.

To reduce the risk of negative impact, we began an extensive due diligence process in 2023 to identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions in our value chain. This involved listing all of our suppliers and business partners and sorting them based on contract value, criticality, size, industry, and country of operation.

As per June 2023, we had approximately 130 different suppliers and business partners, where most of these suppliers were only used one time and with a contract value of less than NOK 100.000. Around 50 suppliers were used more frequently (defined as more than once per year). Our most common type of supplier/business partner includes suppliers that deliver design/print material, photography/film making, course/conference partners, catering/food delivery, cleaning, and travel/transportation suppliers.

Two main risk areas were specifically looked at in the 2023 supplier risk assessment: industry and country of operation. Industries that were flagged in the assessment included cleaning, IT equipment and support, catering/food delivery, and transportation. Although we are not aware of any actual breaches, these industries typically have a higher risk when it comes to working overtime and decent pay.

Regarding country of operation, a majority (95%) of our suppliers / business partners only operate in Norway, but seven of our suppliers operate in countries where the risk of human rights breaches is significantly higher, according to the Global Economy's Human Rights and Rule of Law Indicator and the ITUC Global Rights Index (see table below).

Country	GE index score	ITUC score
Kazakhstan	6.8	5
Malaysia	7	5
Bangladesh	7.2	5
Azerbaijan	7.4	No data
India	7.4	5
Pakistan	7.4	5
Thailand	7.6	5

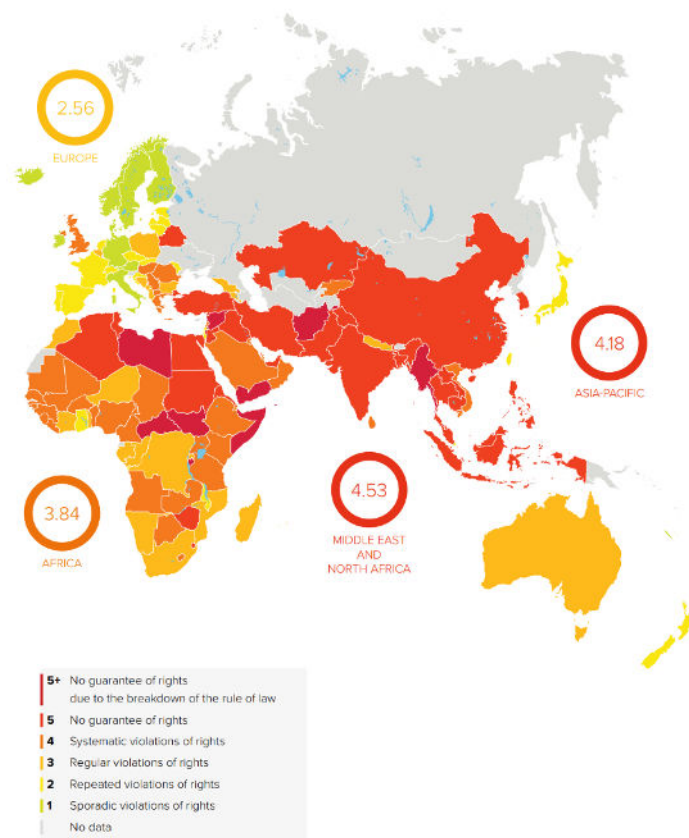


Image: ITUC index 2023

Based on a total evaluation of all criteria, each supplier and business partner were given a score between 1 and 3 in our internal assessment, based on the perceived risk: 1 indicate a safe supplier (“low risk”), 2 indicate a supplier that needs more follow-up / where additional request for information is necessary (“medium / “unknown risk”), and 3 indicate a not safe supplier (“high risk”) where the contract should be terminated or discontinued.

Conclusion

Corporate Communications has not identified any human rights breaches linked to our own activities or in our supply chain in the reporting period. No suppliers/business partners were marked as 3 (“high risk”) in the 2023 supplier/business partner assessment, and thus, no contracts with suppliers were terminated or discontinued. Two suppliers were given a 2 (“medium risk”), and 4 suppliers were given a score between 1 and 2, indicating that further follow-up of these six suppliers are necessary.

KPI	2023
No. of suppliers that were assessed in the reporting period	130 (100%)
No. of contracts terminated / discontinued in the reporting period due to perceived risk of human rights breaches	0
No. of suppliers / business partners that requires further follow-up	6
No. of physical audits conducted in the reporting period	0
No. of significant instances of non-compliance with laws and regulations	0

Going forward

Going forward we will follow-up our suppliers and business partners regarding ethical business conduct. The newly established Supplier Code of Conduct will be communicated to all new and existing suppliers and business partners, with reference to the full document on our website. Suppliers and business partners that received a score of more than 1 in the 2023 assessment will also be asked to sign the Supplier Code of Conduct, stating their commitment to ethical business conduct, and 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 project basis.

We will also make sure that all new employees (including interns and trainees) are informed about our ethical guidelines. New employees will be asked to sign the Code of Conduct as part of the onboarding process, and during 2024 we will provide mandatory training in the Code of Conduct for existing employees. We will also consider whether to establish an external whistleblowing channel on our website.