

1. THE NORWEGIAN TRANSPARENCY ACT REPORT FOR 2022

1.1. Introduction

Orange Business Services AS shall carry out due diligence assessments in accordance with the Transparency Act and make available an account of the assessments.

*"The Act shall promote enterprises' respect for **fundamental human rights and decent working conditions** in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions."*

This report is an account of Due diligence assessments that have been carried out from 1 July 2022 until today, including assessments of any measures that have been implemented.

1.2. Contact information

Please contact us on <https://cloud.orange-business.com/no/kontakt-oss/> if you have questions related to this report.

1.3. Reporting obligations

Orange Business Services AS' head office is at Økern Portal, Lørenfare 1E, OSLO.

The company is obliged to report according to Sections 2 and 3 of the Transparency Act.

2. THE COMPANY

2.1. About the company

Orange Business Services AS is 100% owned by Orange Business S.A, Paris, France.

Orange Business, the business services arm of Orange S.A., offers a variety of services including cloud computing, cybersecurity, internet of things (IoT) solutions, unified communications and collaboration, network and connectivity services, and application management. Its main clients include large national enterprises and public sector organizations in Norway.

Businesses are becoming digital, unique, multinational, and efficient through cloud solutions, digital workplace technology and data driven services. Within these huge fields of technology, Orange Business are focusing on delivering on the needs of customers, supporting them in transforming their evolving platforms and moving their critical applications to hybrid IT and multi-cloud environments locally and globally.

We have been managing complex cloud solutions, mission critical applications, colocation, and digital transformation for customers during more than 20 years. As "Digital Services" we are the digital accelerator of Orange Business and are helping customers through a pool of 2,600+ cloud experts, 3900+ data experts and 2500+ cyberdefense experts. With that scope of services, expertise and know how, you can tap into a universe of opportunities to support your business goals, stay creative and ahead of expectations and competition and drive digital development. This commitment is also central to our purpose: Create positive impact!

We are certified according to ISO27001, ISO 9001, PCI-DSS Level 1, ISO14001, and ISO50001.

We also provide Service Organization Control attestations reports, specifically SOC2 Type II and ISAE3402 Type II, as well as an ISAE3000 report on our GDPR Compliance.

Read more at <https://cloud.orange-business.com/no/>.



2.2. Responsible purchasing at Orange Business Services AS

Orange Business Services AS implements the Orange Group's Sustainable Development and Corporate Social Responsibility (CSR) policy in its governance and procurement processes and establishes relationships of trust and loyalty with its suppliers (contractual commitment, evaluation of CSR aspects and audit), to comply with:

- Social laws with strict respect for the human person, international rules related to labor law, child welfare, health, and safety.
- The environmental, social, and ethical criteria assessed during the company's supplier selection process.

[See our commitments to responsible procurement](#)

2.3. Ethics, the fight against fraud and corruption, international sanctions

The Orange Group is committed to preventing and combating all forms of corruption ([Orange Group Anti-Corruption Policy](#)), complicity, extortion, embezzlement and any improper advantage. Ethics is an imperative issue at all levels of our activity, particularly in our relations with our employees, our suppliers and our subcontractors: ([The Group Code of Ethics](#)). Beyond the strict regulatory constraints, Orange is committed to conducting its activities in a fair and honest manner.

2.4. Our Code of Conduct

The Supplier Code of Conduct describes the ethical, social, and environmental commitments expected by the Orange Group, which requires its suppliers and their own subcontractors to:

- Comply with national, European, and international rules relating to standards of ethical and responsible behaviors, including those dealing with human rights, environmental protection, sustainable development, corruption, and child protection.
- Adopt and apply the Group's ethical standards and commitments and progress in these areas.

Orange supports its suppliers in the pre-contractual and contractual relationship for the effective implementation of this Code of Conduct ([Supplier Code of Conduct](#))

2.5. Assessment of suppliers' Corporate Social Responsibility

For suppliers belonging to high CSR risk categories and/or with a significant annual order value, Orange Group systematically performs CSR assessments to

- better understand the suppliers' initiatives,
- ensure that they are committed to the environment, social and human rights, and good ethical practices,
- meet regulatory obligations, such as The Duty of Care law,
- initiate and monitor corrective action plans.

CSR assessments are based on international CSR standards, such as the Global Compact and ISO26000, and are carried out during contract negotiations and throughout the contract's lifetime.

2.6. Leadership commitment and awareness

The company's policies and routines are firmly rooted in management and are communicated to employees:

- as part of the hiring process
- through our management system for quality, environment, energy, and security
- regular awareness campaigns on our intranet
- annual training, and signing, of relevant guidelines.

2.7. Whistle blowing

Any conduct or situation that violate the law or regulations (fraud, corruption, serious breach of human rights, endangerment of physical health and safety or the environment, etc.), and our internal policies or procedures (anti-corruption policy, code of ethics, etc.) can be reported by all employees on our "Hello Ethics" reporting service, or as a nonconformity finding on our intranet.

2.8. Goals and progress

Orange Business Services AS works continuously to assess risks linked to our activities and business relationships (suppliers and partners).

The Transparency Act added a new dimension to this work and the focus going forward will be to adapt the Orange group's routines and processes to the requirements and reporting in the Transparency Act.

3. DUE DILIGENCE ASSESSMENT

3.1. The Due diligence

Orange Business Services AS continuously assesses the risk that our activities have negative consequences for basic human rights and decent working conditions.

Overall, the due diligence assessment is carried out in the following way:

- embed responsible business conduct into the enterprise's policies
- identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed to, or that are directly linked with the enterprise's operations, products or services via the supply chain or business partners
- implement suitable measures to cease, prevent or mitigate adverse impacts based on the enterprise's prioritizations and assessments pursuant to (b)
- track the implementation and results of measures pursuant to (c)
- communicate with affected stakeholders and rights-holders regarding how adverse impacts are addressed pursuant to (c) and (d)
- provide for or co-operate in remediation and compensation where this is required.

Relevant conditions for due diligence assessment related to the company's activities and business relationships include:

- the context of the Company
- position in the supply chain
- type of product and services

3.2. Our suppliers

Orange Business Services has a total of 907 suppliers and partners by the end of 2022, and we have chosen to look closer at all suppliers/partners who are critical to the operation and/or with a turnover of more than 85.000 EURO, which equates to 92 % of our entire spend.

This gives us 78 suppliers/partners, of which 7 relationships are managed at Orange Group level (CSR, not just sourcing) by Orange Sourcing. This equates to 24 % of all spend.

The remaining 71 are located as follows:

	No of suppliers
Norway	43
EU	20
UK	2
USA	6

3.3. Due diligence assessment of our services.

3.3.1. Managed Services – Private Cloud

Orange Business Services AS mainly delivers Managed Services to our customers, produced in our own data centers in the Oslo region. In this area, there is low risk of violations of human rights and decent working conditions in our own company, in the value chain or with business partners.

3.3.2. Hyperscalers

Orange Business Services AS provides services on well-known platforms such as Azure and AWS. There are reports and articles documenting that some of these actors do not sufficiently comply with the requirements related to pay and working conditions in particular, freedom of association and monitoring of the employees. This worries Orange Business Services AS as a provider of services on - and related to - these platforms. As far as possible, the company uses services from these suppliers that are only based in Europe. Pending a national/EU-owned cloud platform with a corresponding range of services, there are still no real alternatives in the field of digitization in the public cloud.

3.3.3. Subcontractors/experts

When it comes to the subcontractors used to expand competence and capacity in assignments, the assessment is that they pose a low risk. It essentially concerns competence-based companies with highly educated personnel in an orderly and transparent Norwegian labor market.

3.3.4. Hardware

Manufacturers of servers, network components, mobile phones, laptops, and computer monitors pose a high risk of violations of human rights and decent working conditions. These are elements that are considered in our procurement process, but there are few alternatives in the current market.

3.4. Result of the due diligence assessment

Orange Business Services AS considers that we operate in an industry and in locations where there is a low risk of breaches in areas such as privacy, business conduct, HSE, human rights, working conditions and corruption. We also make a similar assessment of our subcontractors.

International providers of cloud services are assessed to represent a medium risk for violations of human rights and working conditions.

Suppliers within the production of mobile phones, portables computers and computer monitors are assessed to pose a high risk to human rights and working conditions.

Area	Services	Risk	Degree of influence
Suppliers			
Hyperscalers	Public Cloud Professional Services	Medium	Low
Hardware	Hardware: Servers, Laptops mm,	High	Low
Partners	Subcontractors/experts	Low	Medium/High
Orange Business Services AS	Consulting Services	Low	High

Identified (risk of) violations of human rights / decent work conditions	Geography	Sources
Employee rights in relation to extraction of raw materials, production of components, and to some extent assembling mobile phones, laptops, and computer monitors. Especially in the form of low wages, forced overtime, abuse of students as labor, dismissal of union leaders.	China and other Asian countries	International media and www.swedwatch.org and www.amnesty.org .
Risk for violation of Freedom of organization, pay conditions, working hours, HSE, monitoring of employees	USA	International media and Human Rights Watch

4. MEASURES TO STOP, PREVENT OR LIMIT NEGATIVE CONSEQUENCES

The assessment has not identified any areas where we have the combination of high or medium risk and medium or high degree of influence. No new measures planned.

5. MONITORING OF MEASURES - IMPLEMENTATION AND RESULTS

To be defined in 2023

6. COMMUNICATION WITH CONCERNED STAKEHOLDERS

To be defined in 2023

7. RESTORATION

To be defined in 2023

Oslo 27. June 2023

Orange Business Services AS, Board of Directors

 _____ Krystof Symons Chairman	 _____ Philippe Mainet Member of the board	 _____ Nemo Verbist Member of the board
 _____ Joar Reithaug Rasmussen Member of the board	 _____ Ingrid Giltvedt Storø Member of the board	 _____ Bjart Kvarme Managing director