

## Communication of Progress 2022

### Overview

Beginning in 2023, the Communication on Progress will require participants to annually:

- a) submit an electronic statement by the Chief Executive Officer expressing support for the UN Global Compact as well as
- b) complete the Communication on Progress questionnaire. This reference document contains the questions that will be presented in the questionnaire.

Overall, the questionnaire is designed to add value to participants in several ways:

- Build credibility and brand value by showing their commitment to corporate sustainability, the Ten
- Measure and demonstrate progress to stakeholders on the Ten Principles, in a consistent and harmonized
- Receive insight, learn and continuously improve performance.

The new platform will provide technical help, resources, and guidance at every step of the way. It will help you identify gaps and set goals to improve sustainability performance year over year. - Compare progress against peers with access to one of the largest sources of free, public, and The questionnaire is structured in five sections. The first section, Governance, provides a cross-cutting overview of the companies' sustainability governance structure. The remaining four sections, Human Rights, Labour, Environment, and Anti-Corruption, survey companies about their performance with respect to the Ten Principles of the UN Global Compact. Within each section, companies will answer questions that address process and policies that demonstrate a company's commitment to progress, efforts taken to prevent negative social and environmental impact, performance indicators, and remediation and reporting mechanisms.

Notably, the human rights and environment sections contain additional nuance. The human rights section provides companies with the opportunity to select their material topics for disclosure, while the environment section includes curated sector-specific questions, for example on water and biodiversity, that are to be answered only by business participants operating in certain industries. This document contains all questions and possible answer options; not all companies will answer all questions when using.

Please note that this questionnaire may be subject to minor edits. Please refer to the digital platform for the final version. Please refer to the United Nations Global Compact Guidelines for Communication on Progress for additional guidance including question rationale and calculation methodology.

[https://info.unglobalcompact.org/591891/2022-01-13/49q7nw/591891/1642091777YUCS9o1k/UNGC\\_CoP\\_GuideBook.pdf](https://info.unglobalcompact.org/591891/2022-01-13/49q7nw/591891/1642091777YUCS9o1k/UNGC_CoP_GuideBook.pdf)

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What is the time period covered by your questionnaire? MM/YYYY - MM/YYYY

## GOVERNANCE

### Policies and Responsibilities

**G1.** Does the board/highest governance body or most senior executive of the company:

Linked to: GRI Disclosures 2-12, 2-14, 2-22 (2021)

(Select all that apply)

- Issue an annual statement about the relevance of sustainable development to the company
- Issue an annual statement that addresses impacts on both people and the environment
- Issue an annual statement highlighting a zero tolerance for corruption
- Sign off on organizational sustainability targets
- Supervise Environmental, Social, and Governance reporting
- Regularly review potential risks related to the business model
- None of the above

**G2.** Does the company have a publicly stated commitment regarding the following sustainability topics?

Linked to: GRI Disclosure 2-23 (2021) (Matrix – Select one answer option per line)

	No, this is not a current priority	No, but we plan to have a commitment within 2 years	Yes, and the commitment is focused on our own operations	Yes, and the commitment includes our own operations and suppliers	Yes, and the commitment includes our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights		<input checked="" type="checkbox"/>			
Labour Rights/ Decent Work		<input checked="" type="checkbox"/>			
Environment		<input checked="" type="checkbox"/>			
Anti-Corruption		<input checked="" type="checkbox"/>			

**G3.** Does the company have in place a code of conduct regarding each of the following sustainability topics?

Linked to: NASDAQ G6.1; GRI Disclosure 2-23 (2021) (Matrix – Select one answer option per line)

	No, this is not a current priority	No, but we plan to have a code of conduct within two years	Yes, focused on employee conduct	Yes, focused on employees and suppliers	Yes, focused on own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights			■		
Labour Rights / Decent Work		■			
Environment		■			
Anti-Corruption			■		

Please provide additional information: **Code of Conduct**

**G4.** Has the company appointed an individual or group responsible for each of the following sustainability topics?

Linked to: GRI Disclosure 2-13 (2021) (Matrix – Select one answer option per line)

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the organization (e.g., has access to relevant information, includes most senior members of organization)
Human Rights			■		
Labour Rights / Decent Work			■		
Environment			■		
Anti-Corruption			■		

Please provide additional information: **Manager - Programs and Reporting**

**G5.** Does the company have a formal structure(s) (such as a cross-functional committee) to address each of the following sustainability topics?

Linked to: GRI Disclosures 2-9, 2-13 (2021)

(Matrix – Select one answer option per line)

	No formal structure	Yes, and with limited influence on outcomes  (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes  (e.g., it includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes  (e.g., it includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, it involves one or more members of senior management)	Yes, and with direct influence at the highest level of the organization  (e.g., full access to relevant information, it involves members at highest level of organization)
Human Rights	■				
Labour Rights / Decent Work	■				
Environment	■				
Anti-Corruption	■				

**Prevention**

**G6.** Does the company have a process or processes to assess risk?

Linked to: GRI Disclosure 205-1 (2016)

(Matrix – Select one answer option per line)

Risk category:	No, this is not a current priority	No, but we are planning to develop one in the next two years	Yes, related to our own operations [Prompts G6.1 for each yes]	Yes, related to our own operations and suppliers [Prompts G6.1 for each yes]	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships) [Prompts G6.1 for each yes]
Human rights risks		■			
Labour rights risks			■		
Environmental risks		■			
Corruption risks			■		

**G6.1.** During the assessment of risk, has your company reviewed those suppliers and/or other business relationships where the risk related to human rights, labour, environment and/or anti-corruption may be particularly severe?  
(Matrix – Select one answer option per line)

Risk category:	No	Yes
Human rights risks	■	
Labour rights risks	■	
Environmental risks	■	
Corruption risks	■	

**G7.** Does the company have a due diligence process through which it identifies, prevents, mitigates, and accounts for actual and potential negative impacts on sustainability topics?  
Linked to: GRI Disclosures 2-12, 2-23-a-ii, 3-1, 3-3-d (2021)  
(Matrix – Select one answer option per line)

	No, this is not a current priority	No, but we are planning to develop one in the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships)
			[Prompts G7.1 for each yes]	[Prompts G7.1 for each yes]	[Prompts G7.1 for each yes]
Risk category:					
Human rights risks		<input checked="" type="checkbox"/>			
Labour rights risks		<input checked="" type="checkbox"/>			
Environmental risks		<input checked="" type="checkbox"/>			
Corruption risks		<input checked="" type="checkbox"/>			

**G7.1.** During the due diligence process, has your company reviewed those suppliers and/or other business relationships where the risk of adverse impacts on human rights, labour, environment and/or anti-corruption may be particularly severe?

Linked to: GRI Disclosures 2-23-e, 3-1 (2021)

(Matrix – Select one answer option per line)

Risk category:	No	Yes
Human rights risks	<input checked="" type="checkbox"/>	
Labour rights risks	<input checked="" type="checkbox"/>	
Environmental risks	<input checked="" type="checkbox"/>	
Corruption risks	<input checked="" type="checkbox"/>	

## Concerns and Grievance Mechanisms

**G8.** Are there any processes through which members of the company’s workforce can raise concerns about the company’s conduct related to human rights, labour rights, environment, or anti-corruption?

Linked to: Reporting Guidance on the 10th Principle Against Anti-corruption – B3; GRI Disclosure 2-26 (2021)

(Radial – Select One)

No, this is not a current priority

No, but we plan to within two years

Yes, we have an informal process (e.g., through supervisors, others) [*Prompts G8.1*]

Yes, we have a formal process [*Prompts G8.1*]

Please provide additional information: **Code of Conduct directs employees to notify the CFO or CEO or Board in case of concerns**

**G8.1.** Please provide additional detail regarding the process(es) the company has through which members of the company’s workforce can raise concerns about the company’s conduct.

Linked to: GRI Disclosure 2-26 (2021)

(Matrix – Select one answer option per line)

	No	Yes
Is the process communicated to all employees/workers in local languages?	<input checked="" type="checkbox"/>	
Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?	<input checked="" type="checkbox"/>	
Is the process confidential (e.g., whistleblowing process)?		<input checked="" type="checkbox"/>
Are there processes in place to avoid retaliation?	<input checked="" type="checkbox"/>	
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)		<input checked="" type="checkbox"/>
Other (Please provide additional information) [ <i>If yes, makes text box mandatory</i> ]		



## Lessons

**G9.** How does the company capture lessons regarding each of the following sustainability topics?

Linked to: GRI Disclosure 3-3-e (2021)

(Matrix – Select one answer option per line)

	No lessons are regularly captured	Conducts root cause analyses/investigation of incidents	Conducts root cause analyses/investigation and changes organizational policies, processes, and practices accordingly	Systematically conducts root cause analyses/investigation and leverages learnings to influence both internal and external affairs
Human Rights	■			
Labour Rights / Decent Work	■			
Environment	■			
Anti-Corruption	■			

## Executive Pay

**G10.** Is executive pay linked to performance on one or more of the following sustainability topics?

Linked to: CDP W6.4 2022, CDP F4.3a 2022, CDP C1.3a (2022); Nasdaq G3 2335; GRI Disclosure 2-19 (2021)

(Matrix – Select one answer option per line)

	No, and we have no intention to change	No, but we plan to within two years	Yes
Human Rights	■		
Labour Rights / Decent Work	■		
Environment	■		
Anti-Corruption	■		

Please provide additional information: **As these topics are the main focus of our work at UN GC Norway, it is not necessary to have pay linked to performance above and beyond in these areas**

## Board Composition

**G11.** Percentage of individuals within the company's board/highest governance body by:

Linked to: ISAR D.1.2., ISAR D.1.3.: GRI Disclosures 2-9 (2021), 405-1 (2016) (Matrix – Percentage & Commentary for each line)

	Number	Not applicable
Total number of board members (#)	12	
Male (%)	58%	
Female (%)	42%	
Non-binary (%)	?	
Under 30 years old (%)	?	
30-50 years old (%)	?	
Above 50 years old (%)	?	
From minority or vulnerable groups (%)	?	
Executive (%)	8%	
Independent (%)	92%	

Please provide additional information: **A list of current Board members is displayed [here](#).**

**G12.** Do you produce sustainability reporting according to:

Linked to: Nasdaq G9.1

(Select all that apply)

- National/local regulation on sustainability
- Security exchange regulations
- European Union Corporate Sustainability Reporting Directive (CSRD)
- Global Reporting Initiative (GRI)
- Sustainability Accounting Standards Board (SASB)
- International Integrated Reporting Council (IIRC)
- Climate Disclosure Standards Board (CDSB)
- Task Force on Climate-related Financial Disclosures (TCFD)
- Other voluntary frameworks (please specify in text box) *[Makes text box mandatory]*
- No sustainability reporting according to any frameworks nor regulations
- We do not produce sustainability reporting outside of this Communication on Progress

## Data Assurance

**G13.** Is the information disclosed in this questionnaire assured by a third-party?

Linked to: CDP C10.1 2022; GRI Disclosure 2-5 (2021)

(Select all that apply)

- No assurance for any metrics
- Limited assurance for minority of metrics (e.g., GHG emissions only) [Prompts G14.1]
- Limited assurance for majority of metrics [Prompts G14.1]
- Reasonable assurance from minority of metrics [Prompts G14.1]
- Reasonable assurance for majority of metrics [Prompts G14.1]
- Other (Please provide additional information) *[Makes text box mandatory]* [Prompts G14.1]

## HUMAN RIGHTS

### Materiality/Saliency

HR1. Which of the following has the company identified as material human rights topics connected with its operations and/or value chain, whether based on their salience (i.e. the most severe potential negative impacts on people) or another basis? [Please select your top 5 material topics]

Linked to: GRI Disclosure 3-2 (2021) (Select all that apply) [Limit 5]

- Freedom of association and the effective recognition of the right to collective bargaining
- Child labour
- Forced labour
- Non-discrimination in respect of employment and occupation
- Safe and healthy working environment
- Working conditions (wages, working hours) [Prompts additional line 'Working conditions (wages, working hours)' in Questions L1, L2, L3, L4, L5, L12]
- Freedom of expression [Prompts additional line 'Freedom of expression' in Questions HR2–HR7]
- Access to water and sanitation [Prompts additional line 'Access to water and sanitation' in Questions HR2–HR7]
- Digital security / privacy [Prompts additional line 'Digital security / privacy' in Questions HR2–HR7]
- Gender equality and women's rights [Prompts additional line 'Gender equality and women's rights' in Questions HR2–HR7]
- Rights of indigenous peoples [Prompts additional line 'Rights of indigenous peoples' in Questions HR2–HR7]
- Rights of refugees and migrants [Prompts additional line 'Rights of refugees and migrants' in Questions HR2–HR7]
- Other \_\_\_\_\_

Please provide additional information: **UNGC Norway works to improve outcomes across all of the above human rights issues. However, for the purpose of its annual CoP report, a distinction has been made between the purpose of UN GC Norway and its operations. The focus in the above list, is on the operations of UN GC Norway. Further information on the purpose, outcomes, and impact of its different initiatives can be found in the annual report and on its website.**

*Note: Labour Rights Topics (Freedom of association and the effective recognition of the right to collective bargaining, child labour, forced labour, non-discrimination in respect of employment and occupation, and a safe and healthy working*

environment) are a subset of human rights and for completeness, were included in this question. Regardless of these labour topics being selected as material in this question or not, all companies will be asked to provide additional details about these labour rights topics in the next section (L.1 and following). For the other human rights topics selected as material in this question, seven additional questions will be asked in the following section.

### Commitment

**HR2.** Does the company have a policy commitment in relation to the following human rights topics? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Disclosures 2-23-a-iv, 2-23-b, 3-3-c (2021) (Matrix – Select one answer option per line)

Human Rights Topics::	No, we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts HR 2.1]	If yes, year policy last reviewed
Freedom of Association		■		-
Safe and Healthy Working Environment		■		-
Working Conditions (wages, working hours)		■		-
Digital Security/Privacy			■	2022
Gender Equality and Women's Rights	■			-

Please provide a link, upload the document and/or provide additional information: Code of Conduct, UNGC Norway Handbook - IT Section, Health, Safety & Environment Manual (to be published Q1, 2023)

If the respondent answers 'yes' in HR2, the below question will be displayed for each relevant topic.

**HR2.1.** For each Human Rights Policy, is it:

Linked to: GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021) (Matrix – Select all that apply for each line)

Human Rights Topics::	Aligned with international human rights standards	Publicly available	Approved at most senior level at company	Applied to the company's own operations	Applied to the company's own operations and the value chain (eg. suppliers, consumers, communities, other business relationships)	Developed involving human rights expertise from inside and outside the company	Other (Please provide additional information) <small>(Makes text box mandatory)</small>
Digital security/privacy				■			

**Prevention**

**HR3.** In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following human rights topics? Matrix will be populated only for the human rights topics selected in HR1.

(Matrix – Select one answer option per line)

Please select the company’s highest level of engagement. Options progress from left to right.

Human Rights Topics::	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/mitigate the risks/ impacts in question	To assess progress in preventing / mitigating the risks/ impacts in question	To collaborate in the prevention/mitigation of the risks/ Impacts in question
Freedom of association				■		
Safe and healthy working environment				■		
Working conditions (wages, working hours)				■		
Digital security/ privacy	■					
Gender Equality and women’s rights	■					

**HR4.** What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this human rights topic? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Disclosure 3-3-d (2021)

(Matrix – Select all that apply for each line)

Human Rights Topics::	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (eg. partners, suppliers, clients etc.)	Conducted auditing process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) (Makes text box mandatory)	No action within reporting period
Freedom of association						■	
Safe and healthy working environment	■						
Working conditions (wages, working hours)						■	
Digital security/privacy						■	
Gender Equality and women's rights							■

Please provide additional information: **UNGC Norway Handbook, Risk Assessment (Q2, 2022) and consultation with staff (Aug 2022)**

**HR5.** Who receives training for the following human rights topics? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Disclosure 3-3-d (2021)

(Matrix – Select all that apply for each line)

Human Rights Topics::	No training provided	Select Employees	All employees	Contractors	Direct Suppliers of the organization	Indirect suppliers of the organization	Others (such as partners, clients etc.)
Freedom of association	■						
Safe and healthy working environment		■					
Working conditions (wages, working hours)	■						
Digital security/privacy	■						
Gender Equality and women's rights	■						

Please provide additional information: **Select employees may receive basic Health and Safety and first-aid training in H1, 2023. All employees have training opportunities relating to the Ten Principles via the Global Compact Academy.**

**HR6.** How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights topics? Matrix will be populated only for the human rights topics selected in HR1.

Linked to: GRI Discussion 3-3-e (2021)

(Matrix – Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.



Human Rights Topics::	No Monitoring of Progress	Review Topics on ad-hoc basis	Set annual target/goals, track progress over time (internal programs only)	Set annual target/goals, track progress over time (internal and external programmes)	Other (Please Provide additional information) (Makes text box mandatory)
Freedom of association		■			
Safe and healthy working environment			■		
Working conditions (wages, working hours)		■			
Digital security/ privacy	■				
Gender Equality and women's rights	■				

Please provide additional information: **Refer to HSE Manual to be published in Q1, 2023 for list of HSE goals**

### Response

**HR7.** During the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact associated with the following human rights topic(s)? Matrix will be populated only for the human rights topics selected in HR1.

(Matrix – Select one answer option per line)

Human Rights Topics::	Yes remedy provided/enabled	No remedy provided/ enabled	No adverse impact identified or caused	Choose to not disclose
Freedom of association			■	
Safe and healthy working environment			■	
Working conditions (wages, working hours)			■	
Digital security/ privacy			■	
Gender Equality and women's rights			■	

**HR8.** Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the human rights principles, including any challenges faced and actions taken towards prevention and/or remediation.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021)

UN GC Norway advocates for changes at the policy level politically and in the media. We published news articles and social media posts relating to gender equality and migrant rights and were present at political hearings around gender rights. In addition, our staff attended events promoting the children's rights and business principles. We are also working to an initiative to promote business and peace, called the UN Business Arena for Peace and Sustainability, which will start with a key stakeholder meeting in Q2, 2023, followed by a high-level international conference in 2024.

# LABOUR

## Commitment

**L1.** Does the company have a policy on commitment in relation to the following labour rights principles? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosure 3-3-c (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix – Select one answer option per line)

Labour Topics::	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy or as a stand-alone policy (Prompts: L1.1)	Not Applicable (Please provide additional Information) Makes text box mandatory	If yes, year policy last reviewed (YYYY)
Freedom of association and the effective recognition of the right to collective bargaining			■		2022
Forced Labour	■				-
Child Labour	■				-
No discrimination in respect of employment and occupation		■			2022
Safe and healthy working environment		■			2022
Working conditions (wages, working hours)		■			2022

Please provide a link, upload the document and/or provide additional information: **UN GC Norway Handbook, Code of Conduct, Health, Safety and Environmental Manual (to be published Q1, 2023)**

If respondent answers 'yes' in L1, the below question will be displayed for each relevant topic.

**L1.1.** For each labour rights policy, is it:

Linked to: ILO C155 - Occupational Safety and Health Convention 1981 (No. 155); GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021)

(Matrix – Select all that apply for each line)

Labour Topics:	Aligned with international human rights standards	Publicly available	Approved at most senior level at company	Applied to the company's own operations	Applied to the company's own operations and the value chain (eg. suppliers, consumers, communities, other business relationships)	Developed in consultation with workers and their representatives	Developed involving labour rights expertise from inside and outside the company	Other (Please provide additional information) (makes text box mandatory)
Freedom of association and the effective recognition of the right to collective bargaining				■				
Non discrimination in respect of employment and occupation				■				
Safe and healthy working environment				■				
Working conditions (wages, working hours)				■				

Please provide additional information: **UN GC Norway Handbook, Code of Conduct, Health, Safety and Environmental Manual (to be published Q1, 2023)**

If respondent answers 'yes' in L1 regarding 'Freedom of association and the effective recognition of the right to collective bargaining,' the below question will be displayed.

**L1.2.** Does the existing company’s policy on freedom of association and collective bargaining:

Linked to: ILO C155- Occupational Safety and Health Convention 1981 (No. 155); GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021)

(Matrix – Select one answer option per line)

Labour Topics::	No, and we don't have plans to include it in a policy	No, but we plan to include it in a policy in the next two years	Yes, included in relevant policy	Not Applicable (Please provide additional Information)
Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of anti union discrimination	■			
Prohibit any acts of interference in trade unions		■		
Facilitate Collective actions with trade union representatives		■		
Provide trade union representatives with the information required for meaningful bargaining in the context of bona fide negotiations		■		
Reference the respect for the right of workers to submit grievances without suffering		■		

Please provide additional information: **See UN GC Norway Handbook. Employee Representative elected in December 2022 to work systematically with this issue.**

**Prevention**

**L2.** In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following labour rights topics? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosures 3-1-b, 3-3-f (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), Gri 406 (201), GRI 403 (2018)

(Matrix – Select one answer option per line)

Please select the company’s highest level of engagement. Options progress from left to right.

Labour Topics:	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/mitigate the risks/ impacts in question	To assess progress in preventing / mitigating the risks/ impacts in question	To collaborate in the prevention/mitigation of the risks/ Impacts in question	Other (Please provide additional information)  (Makes text box mandatory)
Freedom of association and the effective recognition of the right to collective bargaining			■				
Forced Labour	■						
Child Labour	■						
Non discrimination in respect of employment and occupation	■						
Safe and healthy working environment			■				
Working conditions (wages, working hours)			■				

Please provide additional information: **A risk assessment was conducted in Q2, 2022. Staff were consulted on the findings in strategy meetings in August 2022. Further, a Health, Safety and Environment Representative was elected in August 2022 and Employee Representative in December, 2022.**

**L3.** What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this labour rights topic? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix – Select all that apply for each line)

Labour Topics::	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (eg. partners, suppliers, clients etc.)	Conducted auditing process and/or corrective action plan	Collective action with peers or other stakeholders, in particular worker's organization to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) (Makes text box mandatory)	No action within reporting period
Freedom of association and the effective recognition of the right to collective bargaining							■
Forced Labour							■
Child Labour							■
Non discrimination in respect of employment and occupation							■
Safe and healthy working environment	■						
Working conditions (wages, working hours)							■

Please provide additional information: **Appointment and Training of the Health and Safety Representative**

**L4.** Who receives training for the following labour rights topics? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix – Select all that apply for each line)

Labour Topics::	No training provided	Select Employees	All employees	Contractors	Direct Suppliers of the organization	Indirect suppliers of the organization	Others (such as partners, clients etc.)
Freedom of association and the effective recognition of the right to collective bargaining	■						
Forced Labour	■						
Child Labour	■						
Non discrimination in respect of employment and occupation	■						
Safe and healthy working environment		■					
Working conditions (wages, working hours)		■					

Please provide additional information: **Employees are encouraged to read code of conduct, Handbook, and are trained in basic health and safety measures. Managers are trained to be aware that decent working conditions are maintained.**

**L5.** How does the company assess progress in preventing/mitigating the risks/impacts associated with the following labour rights topics? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosure 3-3-e (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix – Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.



Labour Topics::	No Monitoring of Progress	Review Topics on ad-hoc basis	Set annual target/goals, track progress over time (internal programs only)	Set annual target/goals, track progress over time (internal and external programmes)	Other (Please Provide additional information) (Makes text box mandatory)
Freedom of association and the effective recognition of the right to collective bargaining		■			
Forced Labour	■				
Child Labour	■				
Non discrimination in respect of employment and occupation		■			
Safe and healthy working environment			■		
Working conditions (wages, working hours)		■			

## Performance

**L6.** Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than those provided in legislation or in an applicable sectoral agreement, where appropriate?(Select all that apply)

- No
- Yes, by providing more favourable conditions related to wages
- Yes, by providing more favourable conditions related to working hours
- Yes, by providing more favourable conditions related to health coverage and/or sick leave
- Yes, by providing additional rights not otherwise provided (Please provide additional information) *[Makes text box mandatory]*
- There is (are) no existing collective bargaining agreement(s)

**L7.** In the course of the reporting period, what was the percentage of women in senior leadership level positions? (%)  
Linked to: ISAR C.1.1.

(Matrix – Text Box with option for Unknown or N/A)

	Percent of women (%)	Unknown
Senior leadership level position	<u>40%</u>	

Please provide additional information: **Women- Prenille, Oda Men- Kim, Knut, Felipe**

**L8.** What was the average ratio of the basic salary and remuneration of women to men (comparing jobs of equal value) during the reporting period?

(Matrix – Text Box with option for Unknown or N/A)

	Salary Ratio(%)	Unknown	Choose not to disclose (Makes Text Box Mandatory)
Women/Men (%)	-----	■	

**L9.** In the course of the reporting period, how frequently were workers injured (injuries per hour worked)?

Linked to: ISAR C.3.2; GRI Disclosure 403-9 (2018)

(Matrix – Text Box with option for Unknown or N/A)

	Incident Rate	Unknown	Choose not to disclose (Makes Text Box Mandatory)
Incident Rate	-----	■	

## Response and Reporting

**L11.** In the course of the reporting period, has the company been involved in providing or enabling remedy if it has caused or contributed to the adverse impact associated with the following labour rights topics? For the user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

(Matrix – Select one answer option per line)

Labour Topics::	Yes remedy provided/enabled	No remedy provided/ enabled	No adverse impact identified or caused	Choose to not disclose (Makes text box mandatory)
Freedom of association and the effective recognition of the right to collective bargaining			■	
Forced Labour			■	
Child Labour			■	
Non discrimination in respect of employment and occupation			■	
Safe and healthy working environment			■	
Working conditions (wages, working hours)			■	

Please provide additional information: **To ensure more systematic work with Health and Safety and Employee Representation, representatives were elected in these areas in Q3 and Q4, 2022**

**L12.** Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the labour rights principles, including any challenges faced and actions taken towards prevention and/or remediation.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

Text Box

# ENVIRONMENT

## Commitment

**E1.** Does the company have a policy commitment on the following environmental topics?

Linked to: CDP C4.1 2022, CDP F6.1 2022, CDP W6.1 2022; GRI Disclosure 3-3-c (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

(Matrix – Select one answer option per line)

Environmental Topics::	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy or as a stand-alone policy (Prompts: E1.1)	Not Applicable (Please provide additional information) Makes text box mandatory	If yes, year policy last reviewed (YYYY)
Climate Change		<input checked="" type="checkbox"/>			-
Water		<input checked="" type="checkbox"/>			-
Oceans	<input checked="" type="checkbox"/>				-
Forests/Biodiversity/Land Use		<input checked="" type="checkbox"/>			-
Air Pollution	<input checked="" type="checkbox"/>				-
Waste (e.g. chemical spills, solid waste, hazardous plastic, etc.)		<input checked="" type="checkbox"/>			-
Energy & Resource use		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		-

If respondent answers 'yes' in E1, the below question will be displayed for each relevant topic.

**E1.1.** For each environmental policy, is it:

Linked to: CDP C4.1 2022, CDP F6.1 2022, CDP W6.1 2022; GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021)

(Matrix – Select all that apply for each line)

Environmental Topics:	Aligned with international environmental standards	Publicly available	Approved at most senior level at company	Applied to the company's own operations	Applied to the company's own operations and the value chain (eg. suppliers, consumers, communities, other business relationships)	Developed involving environmental expertise from inside and outside the company	Other (Please provide additional information)  (Makes text box mandatory)

## Prevention

**E2.** In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following environmental topics?

Linked to: GRI Disclosures 3-1-b and 3-3-f (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

(Matrix – Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.

Environmental Topics::	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/mitigate the risks/ impacts in question	To assess progress in preventing / mitigating the risks/ impacts in question	To collaborate in the prevention/mitigation of the risks/ Impacts in question	Other (Please provide additional information)  (Makes text box mandatory)
Climate Change			■				
Water	■						
Oceans			■				
Forests/Biodiversity/Land Use	■						
Air Pollution	■						
Waste (e.g. chemical spills, solid waste, hazardous plastic, etc.)	■						
Energy and Resource Use			■				

**E3.** What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with these environmental topics?

Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-iv (2016)

(Matrix – Select all that apply for each line)

Environmental Topics::	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (eg. partners, suppliers, clients etc.)	Conducted auditing process and/or corrective action plan	Collective action with peers or other stakeholders, in particular worker's organization to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) (Makes text box mandatory)	No action within reporting period
Climate Change	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Water	<input checked="" type="checkbox"/>						
Oceans		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			
Forests/Biodiversity /Land Use	<input checked="" type="checkbox"/>						
Air Pollution							<input checked="" type="checkbox"/>
Waste (e.g. chemical spills, solid waste, hazardous plastic, etc.)							<input checked="" type="checkbox"/>
Energy and Resource Use		<input checked="" type="checkbox"/>					

Please provide additional information: **Training available on the Global Compact Academy, Engagement in the Ocean Platform, , Policy work around Science-based Climate Targets**

**E4.** How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

Linked to: GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

(Matrix – Select one answer option per line)

Please select the company's highest level of engagement. Options progress from left to right.

Environmental Topics::	No Monitoring of Progress	Review Topics on ad-hoc basis	Set annual target/goals, track progress over time (internal programs only)	Set annual target/goals, track progress over time (internal and external programmes) (Prompts E 4.1)	Other (Please Provide additional information) (Makes text box mandatory)
Climate Change		■			
Water	■				
Oceans	■				
Forests/Biodiversity/Land Use	■				
Air Pollution	■				
Waste (e.g. chemical spills, solid waste, hazardous plastic, etc.)	■				
Energy and Resource Use	■				

If respondent answers in E4 that they set annual targets, the below question will be displayed for each relevant topic.

**E4.1.** For each environmental topic in which the company sets timebound goals/targets, what kind of targets has the company set?

Linked to: CDP F6.1 2022; GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

(Matrix – Text box for each line)

Description of targets (e.g., what is the target, absolute vs. intensity, externally verified, on track, etc.)

Climate change	No monitoring of progress
Water	No monitoring of progress
Oceans	No monitoring of progress
Forests/Biodiversity/Land Use	No monitoring of progress
Air pollution	No monitoring of progress
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	No monitoring of progress
Energy & resource use	No monitoring of progress

If respondent answers in E4 that they set annual targets, the below question will be displayed for each relevant topic.

**E4.2.** For each environmental topic in which the company sets timebound goals/targets, how is progress against target/goal tracked?

Linked to: GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

(Matrix – Select all that apply for each line)

Environmental Topics::	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information) (Makes text box mandatory)
Climate Change				

**E5.** In the course of the reporting period, has the company been involved in providing or enabling remedy for any actual impacts associated with the following environmental topic(s)?

Linked to: GRI Disclosure 3-3-d-ii (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

(Matrix – Select one answer option per line)

Environmental Topics::	Yes remedy provided/enabled	No remedy provided/ enabled	No adverse impact identified or caused	Choose to not disclose (Makes text box mandatory)
Climate Change			<input checked="" type="checkbox"/>	
Water			<input checked="" type="checkbox"/>	
Oceans			<input checked="" type="checkbox"/>	
Forests/Biodiversity/Land Use			<input checked="" type="checkbox"/>	
Air Pollution			<input checked="" type="checkbox"/>	
Waste (e.g. chemical spills, solid waste, hazardous plastic, etc.)			<input checked="" type="checkbox"/>	
Energy and Resource Use			<input checked="" type="checkbox"/>	



## Climate Action

### E6. What were the company's gross global greenhouse gas emissions for the reporting period?

Linked to: CDP C6.1 2022, CDP C6.3 2022, CDP C6.5 2022; GRI Disclosures 305-1, 305-2, 305-3 (2016); ISAR B.3.1; ISAR B.3.2

(Matrix – Select one answer option per line + text box)

'Partial' option will only be available for Scope 3 Emissions.

	Proportion measured			Emissions (tCO <sub>2</sub> e)	If 'None', please explain
	Full	Partial [Prompts E6.1]	None		
Scope 1 emissions			■	-	Have not established measurement systems yet
Scope 2 emissions			■	-	Have not established measurement systems yet
Scope 3 emissions			■	-	Have not established measurement systems yet

Please provide additional information: **Plan to explore how climate accounting in 2023**

If respondent answers 'Partial' for Scope 3 emissions in E6, question E.6.1 will appear.

### E6.1. Which Scope 3 categories are included in the organization's scope 3 emissions calculation?

Linked to: UNRISD Tier III; GRI Disclosure 305-3 (2016); CDP C6.5 2022

(Select all that apply)

- Purchased goods and services
- Capital goods
- Fuel- and energy-related activities
- Upstream transportation and distribution

- Waste generated in operations
- Business travel
- Employee commuting
- Upstream leased assets
- Downstream transportation and distribution
- Processing of sold products
- Use of sold products
- End-of-life treatment of sold products
- Downstream leased assets
- Franchises
- Investments
- Other - upstream
- Other - downstream

Please provide additional information: **These are the type of Scope 3 emissions that will be included once climate accounting is established**

**E7.** What percentage of the company's revenue was invested in R&D of low-carbon products/services during this reporting period?

Linked to: CDP C4.3c 2022; CDP C4.2b 2022; (partially linked to) ISAR A.3.3

(Matrix – Text Box with option for Unknown or N/A)

	Percent of revenue (%)	Unknown	Not applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
R&D for low-carbon products/services	-		■

Please provide additional information: **UN GC Norway does not have a traditional R&D Budget. All the funding we received is invested in services that are intended to help our members reduce their impact and realize the SDGs, but is difficult to access them as low carbon.**

**E8.** Has the organization acted to support climate change adaptation and resilience?

Linked to: GRI Disclosure 201-2-a-iv (2016)

(Select all that apply)

- We have taken action to increase organization-wide resilience to climate change
- We have taken action to increase resilience in our supply chains
- We have taken action to increase resilience in the communities in which we operate
- We have provided funding for climate change adaptation and resilience initiatives and projects
- We have not taken actions to build climate change resilience in the reporting period
- Unknown
- Other

**Energy/Resource Use**

**E9.** Please report the company's renewable energy consumption as a percentage of total energy consumption in the reporting period.

Linked to: ISAR B.5.1; GRI Disclosure 302-1 (2016)

(Matrix – Text Box with option for Unknown)

	% of total energy consumption	Unknown
Renewable energy consumption as % of total energy consumption:	-	■

**Technology**

**E10.** What percent of the company's revenue came from low-carbon products/services during this reporting period?

Linked to: SASB CG-MR-410a.1a; WEF Common Metrics

(Matrix – Text Boxes with option for Unknown or N/A)

	Percent of total revenue (%)	Description of products/services included (e.g., relevant certification)	Unknown	Not Applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
Low-carbon products and services/total revenue for the reporting period	0%	_____		■

Please provide additional information: **See response for E7 above.**

### Sector-specific Questions

Note: Questions E.11 to E.20 will only appear in the questionnaire and be of mandatory response if the company operates in certain sectors, as identified in their application to UN Global Compact.

If the company selected 'Diversified - Other' in the application, they will be prompted to complete question 'E' below before proceeding.

**E.** Which sector(s) does the company operate in? If diversified, choose top 3 by revenue.

Linked to: GRI Disclosure 2-6-a (2021)

(Select all that apply)

#### Automobiles & Parts

- Automobiles & parts

#### Banks

- Banks

#### Basic resources

- Forestry & paper
- Industrial metals & mining
- Mining

#### Chemicals

- Chemicals

#### Construction & Materials

- Construction & materials

#### Financial Services

- Equity investment instrument
- Financial services
- Nonequity investment instruments

#### Industrial Goods & Services

- Aerospace and defense
- General industrials
- Electronic & electrical equipment
- Industrial engineering
- Support services
- Industrial transportation

#### Insurance

- Life insurance
- Non-life insurance

#### Media

- Media

#### Oil & Gas

- Alternative Energy
- Oil equipment, services, & distribution
- Oil & gas producers

Food & Beverages

- Beverages
- Food producers

Health Care

- Health care equipment & services
- Pharmaceuticals & biotechnology

Other

- Diversified

Personal & Household Goods

- Household goods & home construction
- Leisure goods
- Personal goods

**Sector Specific:Water**

**Note: The below water question will be visible only to companies in select sub-sectors of the following sectors: oil & gas, chemicals, basic resources, construction & materials, industrial goods & services, food & beverage, travel & leisure, utilities, real estate, automobiles & parts, health care, and personal & household goods.**

**E11.** Please provide details regarding the company's water withdrawal and consumption (own operations) during the reporting period.

Linked to: ISAR B.1.3; CDP W1.2b 2022, CDP W1.2d 2022; SASB CG-HP-140a.1; GRI Disclosures 303-3, 303-5 (2018) (Matrix – Text Boxes with option for Unknown or N/A)

Water withdrawal (volume of water in megaliters):	Unknown	Not applicable(Please provide additional information) [Makes text box mandatory]
<hr/>		
Total		
<i>BY SOURCE</i>		
Fresh surface water:	-	
Groundwater:	-	
Brackish surface water/seawater:	-	
Produced water:	-	
Third-party water:	-	
Percentage of water withdrawn in regions with high or extremely high water stress(%)	-	



**E13.** Please report the number and area (in hectares) of sites owned, leased, or managed by the company in or adjacent to protected areas and/or key biodiversity areas (KBA)  
Linked to: GRI Disclosure 304-1 (2016)

(Matrix – Text Boxes with option for Unknown or N/A)

	Unknown	Not applicable(Please provide additional information) [Makes text box mandatory]
Sites	-	
Hectares	-	

**E14.** What area (in hectares) of natural ecosystems was converted during the reporting period in areas owned, leased, or managed by the company?  
Linked to: CDP F1.3 2022; GRI Disclosure 304-1 (2016)

(Matrix – Text Boxes with option for Unknown or N/A)

Conversion of Natural Resources	Area (hectares)	Unknown	Not Applicable (Please provide additional information) [Makes text box mandatory]
	—		

**E15.** Is the company supporting or implementing project(s) focused on ecosystem restoration and protection?  
Linked to: CDP F6.11 2022; Disclosure 304-3 (2016)

(Matrix – Select one answer option per line + text box)

	No	No but we plan to in the next two years	Yes	If yes, project area to date (hectares)
Forest ecosystem restoration				
Other ecosystem restoration				
Reforestation				
Natural regeneration				
Agroforestry				
Set-aside land				
Biodiversity offsetting				
Other (Please provide additional information)				

### Sector-Specific: Air Pollution

**Note:** The below air pollution questions will be visible only to companies in select sub-sectors of the following sectors: oil & gas, chemicals, basic resources, industrial goods and services, utilities.

**E16.** Where applicable, please report the company's emissions of the following pollutants during the reporting period.

Linked to: GRI Disclosure 305-7 (2016); ISAR B.1.4

(Matrix – Text Box with option for Unknown or N/A)

Air Pollutants	Emissions (t)	Unknown	Not Applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
NO <sub>x</sub>	-		
SO <sub>x</sub>	-		
Volatile Organic Compounds (VOCs)	-		
Hazardous air pollutants (HAPs)	-		
Particulate matter (PM10)	-		
Persistent organic pollutants (POPs)	-		
Other (Please provide additional information)	-		



### Sector-specific: Waste

**Note:** The below waste questions will be visible only to companies in select sub-sectors of the following sectors: chemicals, basic resources, construction & materials, industrial goods and services, automobiles & auto parts, health care, retail, utilities.

**E17.** Please report the company's total weight of waste generated in metric tonnes during the reporting period.

Linked to: GRI Disclosure 306-3 (2020); (partially linked to) ISAR B.2.1

(Matrix – Text Box with option for Unknown or N/A)

	Waste Generated (t)	Unknown	Not Applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
Solid Waste	—		

**E18.** Please report the percentage of the company's waste that was hazardous waste (i.e., hazardous waste ratio) during the reporting period.

Linked to: GRI Disclosures 306-4, 306-5 (2020); ISAR B.2.3

(Matrix – Text Box with option for Unknown or N/A)

	Hazardous Waste ratio (%)	Unknown	Not Applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
Solid Waste	—		

**E19.** Please report the company's estimated metric tonnes of single-use plastic consumed wherever material along the value chain during the reporting period.

Linked to: WEF Common Metrics

(Matrix – Text Box with option for Unknown or N/A)

	Single-use plastics (tonnes)	Unknown	Not Applicable (Please provide additional information) <i>[Makes text box mandatory]</i>
Single-use Plastics	—		

## Overall Environment

**E20.** Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the environment principles, including any challenges faced and actions taken towards prevention and/or remediation.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016), GRI 306 (2020), GRI 302 (2016)

Text Box

## ANTI-CORRUPTION

### Commitment

**AC1.** Does the company have an anti-corruption compliance programme?

Linked to: GRI Disclosure 3-3-c (2021) for the topic GRI 205 (2016)

■ No, it is not an immediate business priority

No, but we plan to in the next two years

Yes

Please provide additional information: **We have a Code of Conduct for employees to read and sign, as well as training in anti-corruption being available to all staff via the Global Compact Academy**

**AC2.** Does your company have policies and recommendations for employees on how to act in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

No, and we have no plans to develop a policy

No, but we plan to in the next two years

■ Yes, included within a broader policy

Yes, articulated as a stand-alone policy

Please provide link, upload the document and/or provide additional information: **See Code of Conduct which employees read and sign.**

## Prevention

### AC3. Who receives training on anti-corruption and integrity?

Linked to: WEF Common Metrics; GRI Disclosure 205-2 (2016)

- No training provided
- Select employees
- All employees
- Contractors
- Direct suppliers of the organization
- Indirect suppliers of the organization

Please provide additional information: **Employees are asked to read and sign the Code of Conduct in the onboarding process.**

### AC3.1. How often is such training provided?

	One time only	Every year	Every two or more years	We do not collect this data
Select employees				
All employees	■			
Contractors				
Direct suppliers of the organization				
Indirect suppliers of the organization				
Other – such as partners, clients, etc.				

Please provide additional information: **During onboarding, but training opportunities are also available via the Global Compact Academy**

**AC4.** Does the company monitor its anti-corruption compliance programme?

Linked to: GRI Disclosure 3-3-e (2021) for the topic GRI 205 (2016); SDG Action Manager - SDG 16: Monitoring Ethics and Corruption

- No, we do not monitor the anti-corruption compliance programme (Please provide additional information)
- Review topics on ad hoc basis
- Yes, through internal employee self-evaluations
- Yes, through automated controls monitoring
- Yes, through external independent monitoring
- Yes, through other mechanisms (Please provide additional information)

Please provide additional information:

**Performance**

**AC5.** Please report the company's total number and nature of incidents of corruption during the reporting year.

Linked to: GRI Disclosure 205-3 (2016); WEF Common Metrics

(Matrix – Text Boxes with option for Unknown or N/A)

	Number of incident(s)	Nature of incident(s)	Unknown	Choose to not disclose
Confirmed during the current year, but related to previous years	0			
Confirmed during the current year, and related to this year	0			

**Response and Reporting**

**AC6.** Within the reporting period, what measures has the company taken to address suspected incidents of corruption independently or in response to a dispute or investigation by a government regulator?

Linked to: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016).; Reporting Guidance on the 10th Principle Against Anti-corruption – B3

(Select all that apply)

- Initial case assessment
- Internal investigation
- Review by risk/ethics committee
- Review by board of directors
- External audit/review
- Other (Please provide additional information) *[Makes text box mandatory]*
- Not applicable/no incidents in the reporting period

**AC7.** Does your company engage in Collective Action against corruption?

Linked to: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016)

(Radial – Select One)

- No, it is not an immediate business priority
- No, but we plan to in the next two years
- Yes (Please explain) *[Makes text box mandatory]*

Please provide additional information:

**AC8.** Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation.

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for the topic GRI 205 (2016)

Text Box