Reporting year 2025

Transparency Act statement

Due diligence assessments for sustainable business practices

ORANGE BUSINESS NORWAY AS

Established	01.09.1989
Address	Lørenfaret 1E Økern Portal, 0585 Oslo
NACE-Industry	61.100 Cable-based telecommunications
Employees	9
Revenue	85.5 MNOK

About us

Orange Business Norway AS is a provider of advanced IT and telecommunications-related services in the Norwegian market. The company supports business customers with technological solutions that contribute to secure, efficient, and scalable operations.

Orange Business Norway AS is part of Orange Group, a global technology and telecommunications group. The Norwegian entity operates from its office in Oslo and is led by CEO Simon James Ranyard. This statement concerns the activities and due diligence assessments of Orange Business Norway AS.

In 2025, Orange Business Norway's operational focus has included cloud migration, data security, and the responsible use of artificial intelligence. The company has also continued to rely on Group-level policies, governance processes, and supplier requirements, supplemented by local assessments where relevant for the Norwegian supplier base.

Orange Business Norway does not conduct physical production, manufacturing, distribution, trade, or recycling of physical goods. The company's supplier base consists primarily of Group/global suppliers and local service providers. This is relevant to the company's risk assessment, as the direct local supplier base is limited and mainly service oriented.

Orange's Commitment to Human Rights and Decent Working Conditions

Orange Business Norway's commitment to human rights and decent working conditions is primarily governed through Orange Group policies and procedures. These include, among others, the Group Code of Ethics and responsible purchasing requirements.

Through these policies, Orange Group sets expectations for ethical conduct, respect for human rights, responsible procurement, and supplier follow-up. The Group framework includes:

1. Respect for human rights, labor rights, and ethical business conduct
2. Training and awareness for employees and suppliers

3. Regular assessments and follow-up through compliance and governance functions
4. Whistleblowing mechanisms and reporting channels
5. Responsible procurement and supplier requirements

Orange Business Norway follows these Group-level policies and procedures. The company also supplements Group-level due diligence with local assessments where this is relevant to the Norwegian supplier base.

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 implemented internal guidelines and policies, structured training programs, and governance bodies for following up corporate social responsibility topics. Orange has also contributed to industry collaboration through initiatives such as the Joint Alliance for CSR, which supports cooperation and sharing of audit results among telecommunications operators.

For more information about the Group's CSR work related to fundamental human rights, please see our statement on modern slavery and forced labor.

Due diligence prior to 2025

Prior to 2025, Orange Business Norway AS conducted due diligence assessments on Norwegian suppliers not covered by Orange Group's assessments. For the previous reporting period, 13 Norwegian suppliers were selected for further assessment based on a spend threshold of NOK 90,000, combined with risk-based considerations.

All suppliers were screened against the high-risk list published by The Norwegian Government Agency for Financial Management (DFØ). This screening also led to the inclusion of selected suppliers below the spend threshold due to the nature of their industries.

Where relevant, existing due diligence documentation was used as a basis for assessment. This included Transparency Act statements, UN Global Compact Communication on Progress reporting and other relevant due diligence documentation made available by the suppliers. This reduced the need for separate data collection where the supplier had already provided sufficient information.

Developments since 2024

Since the previous reporting period, Orange Business Norway has maintained its overall risk-based approach to due diligence. Given the limited size of the local supplier base and the generally low-risk profile of the suppliers assessed, no fundamental changes have been made to the methodology.

However, certain developments have been reviewed as part of the 2025 assessment. These include continued cloud migration, increased focus on data security and artificial intelligence, and the company's ongoing use of internal control processes. Based on this review, Orange Business Norway has not identified material changes that alter the overall risk assessment under the Transparency Act.

The supplier survey has also been expanded to provide more detailed insight into supplier practices. This has strengthened the company's basis for assessing supplier maturity, supply chain visibility, and potential risk indicators.

Due diligence activities in 2025

In 2025, Orange Business Norway AS continued its due diligence efforts to identify and address potential adverse impacts on human rights and decent working conditions, in accordance with the Transparency Act and aligned with OECD guidelines.

This year, the company:

- expanded the supplier survey to improve data quality and coverage.
- reviewed whether changes in operations, supplier base or external conditions required additional due diligence measures.
- assessed relevant developments related to cloud migration, data security, and artificial intelligence.
- reviewed supplier responses and identified areas requiring further attention.

- continued to rely on Group-level policies and supplier requirements, supplemented by local assessments where relevant.

The due diligence process remains anchored in management and is overseen by the Regional Accounting Manager for Benelux and the Nordic Region.

Given the nature of the Norwegian supplier base, which primarily consists of providers of accounting, insurance and other professional services, the overall risk of adverse impacts is assessed to be low. The company continues to priorities direct suppliers, where its leverage is considered highest.

Supplier survey and key findings for this reporting period

In 2025, Orange Business Norway conducted a supplier survey through Factlines to obtain updated information on supplier practices. The survey covered direct Norwegian suppliers and included questions related to human rights, labor conditions, governance, anti-corruption and supply chain follow-up, aligned with OECD guidelines and the principles of the UN Global Compact.

The responses indicate that the overall risk level in the supplier base remains low. No actual adverse impacts were identified among the surveyed suppliers in 2025.

The survey did, however, identify specific gaps and improvement areas:

- One supplier lacks sufficient visibility into its extended supply chain, including limited knowledge of production locations, manufacturers of key components and upstream risk factors beyond tier-one suppliers.
- One supplier has not fully implemented structured approaches to supply chain oversight, including comprehensive mapping of suppliers and risk exposure.

At the same time, all surveyed suppliers confirmed that they have not identified breaches of their own ethical guidelines within their supply chains during the past 12 months.

Where gaps or weaknesses are identified, Orange Business Norway follows up directly with the relevant suppliers. The purpose of this dialogue is to address identified gaps, improve supplier practices and strengthen transparency in the supply chain.

Planned measures.

Given the low-risk profile of the local supplier base and the reliance on established group-level due diligence processes, the need for additional local measures has been assessed as limited. Orange Business Norway will continue to follow Orange Group's policies and practices.

Where specific risks, gaps or uncertainties are identified, Orange Business Norway will evaluate the need for targeted follow-up with the relevant suppliers. This will support continued improvement of supplier transparency and help mitigate potential risks in the supply chain.

Simon Ranyard

Simon Ranyard

Approved by the CEO in accordance with the Norwegian Transparency Act (Åpenhetsloven).

Certificate Of Completion

Envelope Id: DAD01001-A3E5-8325-804C-311DB15ECFEB		Status: Completed
Subject: Orange Business Norway Transparency Report 2025		
Source Envelope:		
Document Pages: 6	Signatures: 1	Envelope Originator:
Certificate Pages: 1	Initials: 0	Sinue DE de la Torre
AutoNav: Enabled		Orange Business, The Porter Building
EnvelopeId Stamping: Enabled		1 Brunel Way
Time Zone: (UTC+01:00) Brussels, Copenhagen, Madrid, Paris		Slough, SL1 1FQ
		sinue.delatorre@orange.com
		IP Address: 57.66.185.161

Record Tracking

Status: Original 4/30/2026 3:23:41 PM	Holder: Sinue DE de la Torre sinue.delatorre@orange.com	Location: DocuSign

Signer Events	Signature	Timestamp
Simon Ranyard simon.ranyard@orange.com Country Manager Orange Business Sweden AB Security Level: Email, Account Authentication (None)	Simon Ranyard Signature Adoption: Pre-selected Style Using IP Address: 57.66.185.161	Sent: 4/30/2026 3:27:07 PM Viewed: 5/5/2026 10:10:40 AM Signed: 5/5/2026 10:10:47 AM

Electronic Record and Signature Disclosure:
Not Offered via Docusign

In Person Signer Events	Signature	Timestamp

Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp

Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	4/30/2026 3:27:07 PM
Certified Delivered	Security Checked	5/5/2026 10:10:40 AM
Signing Complete	Security Checked	5/5/2026 10:10:47 AM
Completed	Security Checked	5/5/2026 10:10:47 AM

Payment Events	Status	Timestamps