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orange Business

1. THE NORWEGIAN TRANSPARENCY ACT REPORT FOR 2025

1.1. Introduction

Orange Business Digital Norway 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. January 2025 until 31. December 2025.

1.2. Contact information

Please contact us on https://digital.orange-business.com/no-no/contact if you have questions related to this report.

1.3. Reporting obligations

Orange Business Digital Norway AS' head office is at Økern Portal, Lørenfaret 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 Digital Norway 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 for more than 20 years. As part of the "Digital Services" business line in Orange Business we are one of the digital accelerators of Orange Business, working to support our customers' 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.

Orange Business Digital Norway AS is 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://digital.orange-business.com/no-no/.

2.2. Responsible purchasing at Orange Business Digital Norway AS

Orange Business Digital Norway 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

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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. Whistleblowing

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. (Hello Ethics website)

2.8. Goals and progress

Orange Business Digital Norway AS works continually to assess risks linked to our activities and business relationships (suppliers and partners).

The Transparency Act and the French Duty of Vigilance law has added new dimensions to our supplier management and main focus in 2025 has been to adapt our supplier management processes to meet these new requirements.

This includes enhancing our due diligence assessments, improving our supplier evaluation criteria, and ensuring compliance with both Norwegian and French regulations.

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3. DUE DILIGENCE ASSESSMENT

3.1. The Due diligence

Orange Business Digital Norway 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:

a) embed responsible business conduct into the enterprise's policies
b) 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
c) implement suitable measures to cease, prevent or mitigate adverse impacts based on the enterprise's prioritizations and assessments pursuant to (b)
d) track the implementation and results of measures pursuant to (c)
e) communicate with affected stakeholders and rights-holders regarding how adverse impacts are addressed pursuant to (c) and (d)
f) 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. Supplier engagement – 2025 assessment approach

For the 2025 reporting period, the Company completed a comprehensive risk-based supplier assessment covering 586 unique suppliers across Norway (381) The assessment classifies suppliers by country risk, sector risk, and spend materiality, in line with OECD due diligence principles.

In 2024, the Company conducted a supplier survey and received feedback from 42% of suppliers contacted. Building on this foundation, the 2025 assessment applied a risk-based methodology using structured internal data, enabling the Company to identify and prioritize suppliers by potential exposure to human rights and labor conditions risks across the full supplier base.

For the 2025 cycle, the Company focused its due diligence effort on completing a rigorous risk classification of the entire supplier dataset, establishing the structured foundation required for systematic supplier outreach. Direct supplier questionnaires were not issued in this cycle, as the Company prioritized building the risk-assessment infrastructure and supplier database required to conduct outreach effectively and at scale in subsequent cycles.

The Company acknowledges that direct supplier engagement - such as questionnaires and individual supplier dialogue - remains an important component of a complete due diligence process, and that the 2025 cycle did not include this element. The assessment is therefore based on potential risk indicators derived from internal data, rather than validated supplier responses. No adverse impacts on fundamental human rights or decent working conditions were identified through this assessment.

This approach is consistent with a phased implementation of due diligence maturity: the 2024 cycle established direct supplier dialogue; the 2025 cycle has established the risk classification infrastructure; and the 2026 cycle will reintegrate supplier outreach on a structured, risk-prioritized basis, as described in Section 3.5.

The 2025 assessment identified no suppliers presenting high risk to fundamental human rights or decent working conditions. All 381 assessed suppliers operate within the EEA under Norwegian or EU labor and human rights legislation, which provides a high baseline level of protection. Risk classifications therefore reflect the EEA operating context of all assessed suppliers rather than global sector averages.

- The supplier base consists predominantly of IT and software providers, professional services and consulting firms, cloud and technology vendors, and other business service providers. All suppliers were assessed as presenting low risk to fundamental human rights or decent working conditions. This includes suppliers in facilities management, catering, transport, engineering, and staffing; all of which are established companies operating under Norwegian or Swedish regulatory frameworks.
- No suppliers were identified as requiring priority due diligence intervention. No adverse impacts were identified in any supplier relationship.

3.3. Findings

No confirmed adverse impacts on fundamental human rights or decent working conditions were identified through the 2025 assessment. This finding reflects the outcome of the risk-based assessment conducted and will be further validated through direct supplier engagement in the 2026 cycle.

No corrective actions were required in the 2025 reporting period.

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3.5. **Outlook for 2026**

As part of Orange Business Digital Norway AS's ongoing commitment to continuous improvement in responsible sourcing, the Company will further develop its supplier engagement program in 2026. This will include reintroducing structured supplier dialogue as a complement to the risk-based assessment conducted this year, enabling a more complete picture of supplier practices across the value chain. This reflects our approach of progressively deepening due diligence maturity in line with OECD guidelines and the principles of the Transparency Act.

SUPPLY CHAIN MANAGEMENT

Orange asks its suppliers to comply with our CSR standards and to implement them in their own supply chain.

As a responsible contracting company, we wish to obtain CSR guarantees from our Suppliers and, through them, from the entire supply chain.

We choose Suppliers that meet ethical, social, and environmental challenges:

- We select our Suppliers based on CSR criteria during calls for tender, and in advance by means of the specifications set out by Orange's specifiers (R&D, marketing, technical, etc.)
- We make Suppliers undertake a contractual commitment to comply with our Supplier Code of Conduct
- We ensure that Orange's CSR requirements are implemented by Suppliers through CSR assessments, and possibly future on-site audits if required.
- We strive for a high level of cooperation and open dialogue with our Suppliers to create value for all stakeholders, particularly for Orange, its Suppliers and the IT sector, while also contributing to sustainable development
- We expect our Suppliers to apply the same requirements to their partners and subcontractors.
- We uphold the principles of transparency towards customers and our Suppliers throughout the value chain and expect the same from our Suppliers and their subcontractors.
- We expect Suppliers to contribute to promoting the proper use of our services and products based on their solutions.

Oslo 17. June 2026

Orange Business Digital Norway AS, Board of Directors

Rob Willcock
Chairman

Juliet Walker
Member of the board

Thomas Rustad
Member of the board

Håkon Phillip Tønder-Keul
Member of the board

Knut Grøvan
Managing director

Orange Public