



Norwegian Transparency Act statement 2022

This statement contributes ALSO Norway account for the financial year 2022 as required by the Norwegian Transparency Act.

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1. ALSO IN BRIEF

ALSO Norway is part of ALSO Holding with headquarters in Emmen, Switzerland. Founded in 1984, ALSO has developed in the last ten years into one of the leading technology providers in Europe. As a B2B company, ALSO is the link between vendors and resellers, who then sell hard- and software to consumers and commercials. The company has systematically expanded its business models from being a traditional ICT distributor to end-to-end service provider, with a broad portfolio of hardware and software, as well as offers for IT solutions, the Cloud, IoT, and other digital platforms. The goal is to ensure the company's sustainable and profitable growth by increasing the competitiveness of its customers and further developing their business.

ALSO Group has a portfolio of over 700 vendors, including all global market leaders, for over 1.450 IT product categories. For resellers, especially SMB partners, the comprehensive offerings enable them to continuously expand the portfolio and services offered to their customers. To this end, they can access a functional webshop, a wide range of solution offerings for IT services, and the ALSO Cloud Marketplace as a platform for their as-a-service business. Retailers and e-tailers appreciate ALSO's speed and flexibility, from electronic connectivity options to logistics services such as warehousing options or delivery on behalf of third parties. In 2022, active business relationships were maintained with around 64.000 resellers.

Our 3S business model

With the three business models Supply, Solutions and Service, ALSO serves the ICT industry in two sales channels: transactional, through the sale of IT components, and subscription-based (consumptional) with cloud-based as-a-service offerings, including possible hybrid solutions.

Supply: Sales in this business model include the wholesale of equipment and applications for the IT, consumer electronics and telecommunications industries.

Solutions: ALSO primarily supports small and medium-sized businesses with IT architecture and IT design issues, translates requirements into concrete configurations at short notice and monitors the status of projects. This business model is characterized by competent support and practical assistance as well as the sale and provision of the required IT components.

Service/Cloud: This business model comprises the "as-a-service" distribution of all technological components that are necessary for a digital workplace ("unique user"), as well as digital platforms for cybersecurity, IoT, AI and gaming/streaming.

2. GUIDELINES, PROCEDURES AND GRIEVANCE MECHANISM

ALSO is focused on operating a profitable business based on principles of respect for the individual and our shared environment. Social responsibility is a part of our culture and integrated in the way we do business.

Our business activities affect the lives of many people in both professional and personal respect. For this reason, dialog with our stakeholders is an important factor in developing and improving our ESG performance. Our goal is to build and permanently maintain trust – always be a reliable, socially oriented, and ecologically responsible company in everything that we do.

To identify the social, economic, and environmental topics which matter most to our stakeholders and our long-term business success, ALSO Group conducted a materiality analysis in 2020. Since then, ALSO Group has been in constant dialog with the stakeholders. External expectations regarding ALSO's Sustainability performance are reviewed, challenged, and discussed in talks with our vendors and customers, as well as with banks and shareholders. Internal expectations are explored at an annual Group meeting with over 200 ALSO managers to identify and verify the demands of all stakeholders along our supply chain.

ALSO Norway is committed to respecting human rights and it is reflected in our Sustainability strategy and Code of Conduct, which is the foundation of our commercial activities and daily interactions. ALSO's Supplier Code of Conduct sets principles for our Suppliers and Business partners. Furthermore, ALSO Group has joined the UN Global Compact in support of the ten principles of the Global Compact in the field of human rights, labour standards, environmental protection and the fight against corruption. ALSO Norway has declared the intention to promote these principles in its sphere of influence.

Our established whistle-blower scheme enables employees, customers, partners, and other stakeholders, to report information about legal offenses and other serious matters related to regulations that apply to ALSO. It includes serious violations of ALSO's internal policies, however, it should not be used for customer complaints or to report on issues related to personal disputes. The procedure is completely confidential. You can find our whistle-blower scheme [here](#).

3. SUPPLIER DUE DILIGENCE PROCESS AND FINDINGS

Not only to fulfil the legal obligations, but also to raise awareness and promote sustainable change along the supply chain with regard to human and labour rights and environmental issues, ALSO has started to engage in a dialogue with its suppliers and customers. With our portfolio of over 700 vendors, assessing human rights at our vendors was an explicit goal in the development of the Supplier Code of Conduct and a comprehensive questionnaire covering all ESG aspects.

To make the supply chain clearer for ALSO, it was divided into vendors, purchasing, transport, storage, production, distribution, and disposal. This subdivision enables ALSO to carry out more targeted analyses. As part of the due diligence process, we conducted a risk assessment of our supply chain, identifying areas where there is an elevated risk of human rights issues. The main area identified is vendors, hardware and software manufacturers – here, ALSO is particularly exposed due to its business activities and therefore more attention and a holistic view must be taken.

The Supplier Code of Conduct and questionnaire was sent out in 2022 to our the most important vendors (revenue-based). This questionnaire includes the topics of human rights, forced or compulsory labour, child labour, general working conditions, wages and benefits, discrimination, freedom of association, collective bargaining, health and safety, business ethics and anti-corruption. The ICT industry products can contain minerals as tin, tantalum, tungsten, and gold (often referred to as 3TG), and known as conflict minerals. The risks associated with conflict minerals are as well related to ethical concerns and potential violations of human rights. Therefore, one part of the questionnaire is dedicated to responsible sourcing.

The responses are being evaluated by ALSO's Sustainable Change department and followed up in discussions as required. While reviewing vendors not only the location of the vendor head office has been noted, but as well consideration is given to the vendor's production /manufacturing operations and locations. In addition, the vendors are also evaluated based on their engagement and commitment to the international corporate social responsibility initiatives, conflict mineral initiatives, including the membership of RBA or the Responsible Labour Initiative, UN Global Compact etc.

Based on the reviews, it is evident that ESG issues are receiving more attention and have become more important for the top-level management of our vendors. This is also visible in the increase of published Sustainability reports and commitments by vendors. Based on the received responses, no significant or potential negative impacts regarding human rights or work practices have been found, but some gaps were identified regarding the lack of formal policies related to responsible sourcing and environmental measures. The response time of vendors and provided documentation to back the answers is another area for improvement and actions have been taken to improve transparency and cooperation.

4. WAY FORWARD

In our opinion, to achieve the aim of the due diligence work it is essential to establish a cooperation, dialogue and raised awareness of the issues, rather than passing the responsibility between parties. Therefore, based on the lessons learned from the process, we have requested our vendors to identify the person responsible for the Sustainability/ESG, with the aim to optimize the response time to our inquiries as well as to engage in closer cooperation with the vendor.

In 2023, our aim is to automate the due diligence process as much as possible to be able to have better overview, transparency and monitoring of the vendors. This as well will help to improve our target to collect the relevant documentation from our vendors.

Concerning the new vendors, in 2023 we will work to align the onboarding process with ESG vetting of the potential new vendors.

The newly established Sustainability Committee and its international experts are also supporting us in ensuring due diligence and the appropriate management of ESG risks.

For further inquiries or questions please contact us via e-mail: Compliance.No@also.com