

# Annual Statement – the Transparency Act – Whiteaway Norge

## 1. Information about the Company

### 1.1 Basic information

Whiteaway.NO AS is a Norwegian private limited company established in 2012. Thomas Zeihlund is the day-to-day manager of the company.

The company is fully owned by the Danish company Whiteaway A/S (which is owned by Whiteaway Group A/S). WhiteAway Group A/S and its subsidiaries' (the Group) primary business area is selling home appliances.

The Company has 8 employees in Norway. The Company's headquarters are located in Oslo.

This statement covers the company's work with the Transparency Act.

### 1.2 Operations

WhiteAway Group A/S and its subsidiaries (the Group) primary business area is selling home appliances. The Group's main business is selling through the Group's e-commerce platforms, sales through a franchise set-up and B2B sales to the professional segment as well as partnerships. The Group operates in Denmark, Norway and Sweden.

Whiteaway AS NO sells through online-platforms Whiteaway.no and Skousen.no and through the franchise-setup Skousen NO.

Our business model is purchasing and selling primarily home appliances and secondarily other electrical household appliances. The products are purchased from mainly European manufacturers, who deliver the products to central warehouses in Aarhus and Stockholm, which are run by external partners. From here, the products are delivered by 3rd party logistic suppliers to the customers, who purchase the products through websites (in DK, SE and NO) in stores (DK and NO) or via our commercial department (DK and SE).

## 2. Obligations under the law

The Transparency Act aims to enhance awareness and knowledge, urging businesses to prioritize fair working conditions and fundamental human rights across their supply chains during the production of goods and delivery of services. Adherence to the law is contingent on proportionality. Businesses subject to the law must ensure public disclosure of their efforts in complying with the Transparency Act, including the handling of any adverse outcomes.

This statement serves to convey the company's commitment to safety assessments and overall legal compliance.

The report spans the period from 1 July 2022, to the current date.

### 3. Compliance

#### 3.1 The company's work with basic human rights and decent working conditions

As a responsible corporate entity, we firmly believe in our broader societal responsibilities. Thus, we consistently assess our impact on the environment, society, and governance aspects of our operations. Our inspiration stems from the UN Global Compact's 10 principles within environment, human rights, labour, and anti-corruption.

Our social responsibility encompasses the well-being of our employees, emphasizing equal opportunities, value-based workplaces, and employee engagement. We are committed to diversity in our leadership positions and have a zero-tolerance policy for human rights violations, including child labour, forced labour, and human trafficking.

The company has diligently reviewed its internal guidelines and contracts in recent years, emphasizing accountability and fair conditions within its own operations and throughout its network of suppliers and business partners. This proactive approach ensures that the company is well-prepared to meet the obligations set forth by the Transparency Act.

Since 2014, we have implemented a Code of Conduct to ensure our suppliers and partners comply with our principles. This Code applies to all suppliers, with continuous reviews based on country risk and purchase volume. Adherence to our official standards is expected from all vendors. We prioritize addressing the significant risks of forced labour and human trafficking in our supply chain. To mitigate these risks, our Code of Conduct is now an obligatory part of our annual negotiations with suppliers, making compliance a requirement for all.

To further strengthen our commitment to human rights, we have introduced a whistle-blower system. This system is open to anyone who has had any business dealings with us, directly or indirectly, and it enables the reporting of any potential human rights violations.

### **3.2 Work with the Transparency Act is anchored in the company's governance**

The company's leadership is actively embracing the Transparency Act, committing to full compliance with its obligations. Continuous efforts will be directed towards assessing risks associated with the company's activities, leveraging relationships with business suppliers and partners. Additionally, ongoing initiatives focus on implementing measures to realize the company's ambitions, which include:

- Improving due diligence based on experience: In progress.
- Enhancing internal competence in sustainability and responsible purchasing practices: In progress.
- Ensuring fair wages and working conditions in our supply chain: In progress.
- Implementing measures to uphold the purpose of the law concerning basic human rights and decent working conditions: In progress.

For any inquiries regarding this report, please contact [legal@whiteawaygroup.com](mailto:legal@whiteawaygroup.com).

## **4. Mapping of Compliance**

### **4.1 Mapping in own company**

The company has conducted an in-depth review of its internal operations, scrutinizing agreements, procedures, guidelines, and systems – encompassing elements like employment contracts, work instructions, and ethical guidelines. Comprehensive assessments of practices and follow-up procedures have been implemented. The findings affirm that the company adheres to the stipulations outlined in the Working Environment Act and other pertinent regulations governing its workforce. The robust adherence to these standards ensures employees enjoy a quality working environment, with their human rights safeguarded as integral members of the company.

### **4.2 Mapping of suppliers**

The company maintains consistent communication with key suppliers, fostering an open dialogue to ensure comprehensive awareness of pertinent conditions. Notably, the majority of the company's suppliers are reputable European entities. This practice ensures a robust exchange of information and strengthens the overall relationship with suppliers.

The company has conducted examinations of suppliers to identify actual or potential negative consequences, encompassing aspects such as objectionable working conditions, health, safety, rest

time, sustainability, and human rights. Adhering to the principle of proportionality and prioritizing efforts for maximum impact, the primary focus of this review has been directed towards suppliers representing more than 2% of the annual cost of goods.

Suppliers undergo an evaluation against our ethical guidelines (Code of Conduct), which includes an overall assessment of each individual supplier. We prioritize addressing the significant risks of forced labour and human trafficking in our supply chain. Our Code of Conduct is an obligatory part of our annual negotiations with suppliers and applies to all suppliers, with continuous reviews based on country risk and purchase volume.

We will maintain and continue this mapping of our suppliers as part of the company's ongoing due diligence assessments.

## **5. Risk assessment**

The company has extensively mapped and evaluated actual and potential consequences regarding fundamental human rights and fair working conditions. These consequences may result from the company's own contributions or direct links to its business activities, products, or services through supply chains or business partners. In the event that a negative impact or significant risk is identified within the company or its supplier network, a thorough assessment will determine the necessary additional measures.

### **5.1 Assessment of own company**

As outlined in section 4.1, the company has conducted an internal business review. Following this assessment, the company considers it unlikely that any risks within its own operations could result in or contribute to negative impact or damage within the areas protected by the Transparency Act.

No violation or risks of violating fundamental human rights or decent working conditions have been identified within the business.

### **5.2 Assessment of suppliers**

As detailed in section 4.2, the company has set demands for its suppliers. Currently, there are no identified specific conditions that suggest actual negative consequences or pose a significant risk to fundamental human rights and decent working conditions.

Suppliers representing more than 2% of the annual cost of goods are mostly European manufacturers with two exceptions, one American and one Turkish. We consider these countries to be low-risk countries in relation to responsible working conditions and compliance with human rights. The production of our own brands is done in China. The risk of poor working conditions and violations on human rights in this part of the world is, in general, higher than in, for instance, the European countries. Our own brands currently represent less than 2% of the annual cost of goods. We expect future supply of own brands from Slovenia and the Czech Republic. The information at the company's disposal suggests a low risk of suppliers violating regulations on decent working conditions. The company's assessments and investigations indicate that the suppliers comply centrally with the regulations that apply in this area. Additionally, suppliers convey the impression of maintaining effective routines that are diligently followed in practice.

The overall risk of basic human rights violations is deemed low. However, the company will focus specifically on suppliers with subcontractors in countries posing a higher risk of violating decent working conditions or basic human rights. Ongoing assessments will be conducted in the future to address and mitigate potential risks.

The company will increasingly demand that suppliers work to prevent violations of basic human rights and decent working conditions.

## 6. Summary





As of now, the company has not identified any actual negative consequences or significant risks stemming from the conducted risk assessments. After examination of available information, the company has appraised the risk of human rights abuses and substandard working conditions within its own organization, as well as with business partners and suppliers, to be low. Consequently, there is currently no perceived necessity for implementing mitigating measures.

Nonetheless, the company remains committed to the ongoing process of mapping its internal operations and the entire supply chain. The efforts aligned with the Transparency Act not only enhance the company's overall awareness but also influence the selection of suppliers. Additionally, this initiative enables the company to inspire similar consciousness among its suppliers in choosing sub-suppliers.

As of [date] in [month] 2024, the management, guided by insights from the report and supporting documentation, asserts that the company aligns with the requirements stipulated in the Transparency Act.

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<div></div> <div><div><b>Ib Dyhr Nørholm</b> Board member, WhiteAway Group b438ca5f-e0a2-4847-9303-7aaa4aaecdc7</div><div>2024-01-30 12:53:07Z</div></div>	<div></div> <div><div><b>Jon Tophøj Kristensen</b> Lead Software Engineer c0ec358c-74b1-45b5-8420-788f7164c557</div><div>2024-01-30 13:38:00Z</div></div>
<div></div> <div><div><b>Thomas Zeihlund</b> e2c2c3c5-a0f2-42e9-9703-958666349677</div><div>2024-01-30 16:04:21Z</div></div>	<div></div> <div><div><b>Johannes Emil Kjærsgaard Gadsbøll</b> Chairman of the Board, WhiteAway Group fe0090cf-7c52-4b7a-9005-a7aa80b98ee9</div><div>2024-01-30 17:53:40Z</div></div>

Dokumenter i transaktionen

Annual Statement Transparency Act NO V03 230124.pdf	Nærværende dokument
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