Key areas of compliance at Avinor

Ethics

Anti-corruption

ESG / CSRD

Privacy/GDPR

Money laundering

Responsible Business

Whistleblowing

The Transparency Act

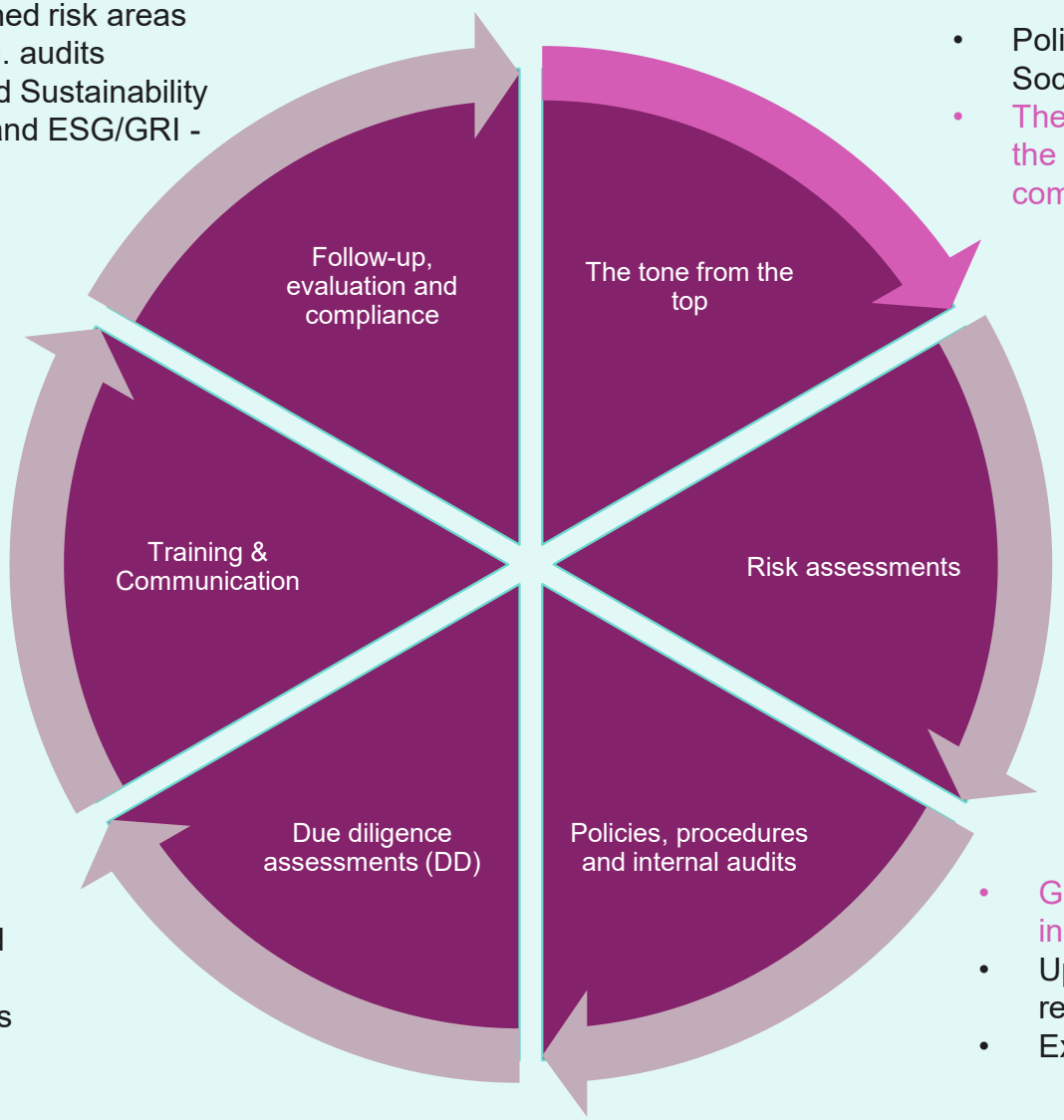
Sustainable supply chain

AVINOR

Detailed description of components of the compliance program

- Annual evaluation and follow-up of defined risk areas
- Implement improvement points from e.g. audits
- Annual reporting through the Annual and Sustainability Report (CSRD), Ethical Trade Norway and ESG/GRI - reporting

- Policy and guidelines for Ethics, Corporate Social Responsibility and Accountability
- The Board of Directors and management set the ambition and standard for Avinor's compliance work



- Annual e-learning in ethics
- Dilemma training for management and the board
- Communication through workshops and intranet pages

- Conducted annually
- Risks are prioritised in consultation with the line

- Internal assessments of supply chain and procurement
- External audits in larger, high-risk projects

- Guidelines for ethics and corporate social responsibility in line with the Group's perceived risk
- Updated and revised regularly and in the event of new requirements/regulations
- External audits are carried out regularly

Examples of existing measures and routines to prevent compliance risk in Avinor

Prohibited Business Practices

- Role overview of the board and KL
- Impartiality is assessed before each board meeting and KL meeting
- Investment ban in selected companies for level 1, 2 and 3 managers
- Annual dilemma training
- Ongoing impartiality assessments
- Code of Conduct
  - Mandatory annual e-learning
- Secondary Registration
- Proxy structure

Privacy Security

- Data processing agreement
- Routines for conducting data protection impact assessments
- Control measures in the workplace (e.g. camera surveillance) are discussed with employees
- Code of Conduct for the Use and Development of AI

Responsible supply chain

- Guidelines for suppliers (Code of Conduct)
- ESPD Form
- Sanctions lists
- Revised procedure for Seriousness and A-Krim
- Whistleblowing channel
- New routines for procurement strategy and qualification
- New routines for contract follow-up of responsibility