

**COMPLIANCE – ANTI CORRUPTION PROGRAMME – PROCEDURE**

Approval date: 7 July 2025

Valid for: Avinor AS, Svalbard Airport

Version: 1.2

**1 DESCRIPTION**

The owner, board, and management are expected to be committed to and actively follow up on the obligations that rest on the companies regarding compliance in the area of anti-corruption. Avinor has established an anti-corruption program to ensure that the organization operates in line with the owner's expectations in this area. The program is based on best practice anti-corruption programs described in the Ministry of Trade, Industry and Fisheries' report *"Review of Corruption Regulations, Anti-Corruption Measures, and Corporate Governance"* dated September 1, 2016.

**2 IMPLEMENTATION****Roles and responsibilities**

NO.	Activity	Execution
	<p><b>Tone from the Top</b></p> <p>The corporate board has adopted an anti-corruption policy that expresses the group's zero tolerance for corruption. The instructions for the corporate board and the CEO outline the responsibilities of the board and the CEO and set requirements for controls. The corporate board and executive management express clear expectations for preventive and investigative efforts.</p> <p><b>Execution</b></p> <ul style="list-style-type: none"> <li>• The corporate board adopts the anti-corruption policy.</li> <li>• The corporate board adopts instructions for its own work.</li> <li>• The corporate board adopts the authorization structure.</li> <li>• The corporate board and executive management maintain an overview of their own roles.</li> <li>• The corporate board and executive management review the annual report from the compliance officer.</li> <li>• The corporate board and executive management conduct annual training/dilemma training.</li> <li>• An external auditor conducts relationship mapping of the members of the board and executive management, as well as their close associates.</li> </ul> <p><b>Documents</b></p> <ul style="list-style-type: none"> <li>• Anticorruption – Group policy</li> <li>• Instruction for board processes</li> </ul>	Management
	<p><b>Code of Ethics</b></p> <p>Avinor's Code of Ethics expresses the group's values and</p>	All employees

	<p>attitudes in interactions with customers, suppliers, colleagues, and the broader environment.</p> <p><b>Execution</b></p> <ul style="list-style-type: none"> <li>• The corporate board adopts the Code of Ethics.</li> <li>• All employees must review the Code of Ethics annually and electronically confirm that they have read and understood it.</li> </ul> <p><b>Documents</b></p> <ul style="list-style-type: none"> <li>• PR00362 Leadership and Competence (HR) - Code of Ethics</li> </ul>	
	<p><b>Internal Audit</b></p> <p>Avinor has established an internal audit function and other control mechanisms. The work follows a risk-based audit plan and conducts regular reviews of the effectiveness of the anti-corruption program.</p> <p>Avinor's corporate board has established the Audit and Risk Management Committee, a subcommittee that monitors the systems for internal control, risk management, and internal audit.</p> <p><b>Execution</b></p> <ul style="list-style-type: none"> <li>• 4.24 Corporate Audit</li> </ul> <p><b>Documents</b></p> <ul style="list-style-type: none"> <li>• PB00032 Corporate Audit - Process</li> </ul>	Group audit

### Preventive systems

No	Activity	Execution
	<p><b>Anti-Corruption Program</b></p> <p>The program encompasses all activities and is designed in accordance with best practices. The goal of the program is to build internal systems that help prevent fraud and corruption, as well as to outline various control activities that should be implemented to address fraud. The group's Code of Ethics is a central component of the program.</p> <p>Documents</p> <ul style="list-style-type: none"> <li>• PR00362 Leadership and Competence (HR) - Code of Ethics</li> </ul>	
	<p><b>Risk Assessment</b></p> <p>To identify corruption risks, other types of risks must also be assessed simultaneously. Risk assessments should cover all parts of the organization and take into account other strategic and operational risks. Identified risks are managed through the strategic risk management system.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• 4.17.1 Strategic Risk Management</li> </ul>	All employees

	<p>Documents</p> <ul style="list-style-type: none"> <li>• PB00029 Strategic Risk Management - Process</li> </ul>	
	<p><b>Preventive Systems Aligned with Actual Risk</b>  Based on identified risks, controls and systems should be established to prevent and detect corruption and fraud. The purpose of these measures is to manage and reduce identified risks.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• Conducted risk assessments must be documented.</li> <li>• Risk-reducing measures must be logged in the strategic risk management system.</li> </ul>	All employees
	<p><b>Training and Education of Employees</b>  All employees must annually review the Code of Ethics and complete ethical dilemma training.  Training should be included as part of the onboarding program for new employees.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• All employees complete e-learning through the competence portal.</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• PR00362 Leadership and Competence (HR) - Code of Ethics</li> </ul>	All employees
	<p><b>Procedures Related to the Engagement of Third Parties</b>  Third parties are understood as external entities with which Avinor enters into contractual relationships. Procurements conducted by Avinor must comply with the rules set forth in the Public Procurement Act and the associated Utilities Regulations. For procurements carried out under Part II of the Utilities Regulations, suppliers must, as part of the qualification process, submit self-declarations confirming that there are no grounds for rejection of their application under the rules in Chapter 20 of the Utilities Regulations. These self-declarations are provided in the so-called ESPD form.</p> <p>Before signing a contract, Avinor must conduct background and integrity checks on the potential contracting party. The focus of these checks will be on the matters declared by the potential contracting party in the ESPD form. The scope of the checks should be risk-based and depend on various risks associated with the specific contracting party.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• An agreement on responsible business conduct, including associated principles, must be signed for each contract.</li> </ul>	All employees

	<ul style="list-style-type: none"> <li>• Authorization to obtain an extended tax certificate and submission of crew lists must be secured for construction and cleaning contracts.</li> <li>• Conduct integrity due diligence on high-risk third parties to verify the information provided in the ESPD form.</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• SP00192 Procurement and Acquisition - Template - Agreement on Responsible Supplier Conduct</li> <li>• SP00279 Legal - Template - Authorization for Obtaining Tax Information</li> </ul>	
	<p><b>Authorization Structure</b> To legally bind Avinor externally, a granted authorization is required. Authorizations within Avinor are issued in writing, signed by the manager, and acknowledged as read and understood by the recipient of the authorization.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• The manager grants authorizations tailored to the employee's position and in accordance with guidelines.</li> <li>• Authorizations are archived in the system for authorization management.</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• SP00299 Finance - Authorization Structure in the Avinor Group</li> </ul>	All employees

### Revealing controls

No	Activity	Execution
	<p><b>Controls Aligned with Actual Risk</b> Controls are conducted on key risks and control activities related to various financial processes.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• 11.1 Finance</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• PB00067 Finance - Group Accounting - Process</li> </ul>	All employees
	<p><b>Control of Employee Compliance</b> Controls shall be conducted on employees based on the risk of corruption and fraud.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• All employees must register their secondary occupations and external roles.</li> <li>• Random checks are conducted on reported secondary occupations.</li> </ul>	Compliance officer

	<ul style="list-style-type: none"> <li>• Random checks are conducted on signed contracts versus authorizations.</li> <li>• Employees must assess their own impartiality when participating in procurement processes. The assessment must be documented in the relevant procurement.</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• Form for reporting secondary occupations</li> <li>• Form for assessing personal impartiality</li> </ul>	
	<p><b>Control of Third-Party Compliance</b></p> <p>Controls shall be conducted on suppliers' compliance with agreements on responsible business conduct and any other contractual provisions related to the same topic, based on the risk of corruption and fraud.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• Based on risk, controls are conducted on third-party compliance with contractual terms regarding responsible business conduct.</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• SP00192 Procurement and Acquisition - Template - Agreement on Responsible Supplier Conduct</li> </ul>	Contract owner
	<p><b>Whistleblowing Channel</b></p> <p>Avinor has established a channel for reporting unacceptable conditions in the workplace. Reports can be made under a full name, anonymously, and by both employees and external parties.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• The whistleblowing channel, "Trygg Varsling," receives reports and ensures they are handled appropriately and at the correct level.</li> <li>• An external law firm (Bull &amp; Co) can be contacted if the whistleblower wishes to remain anonymous. Bull &amp; Co forwards the report to the whistleblowing channel for processing and acts as a contact point between Avinor and the whistleblower.</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• PR00339 Leadership and Competence (HR) - Reporting of Unacceptable Conditions</li> <li>• Information page with contact details on the intranet and avinor.no</li> </ul>	Safe whistleblowing

## Follow-up and Reactions

No	Activity	Execution
	<p><b>Routine for Follow-up of Whistleblowing/Incidents</b></p> <p>A procedure has been established for reporting unacceptable conditions. The procedure outlines case management rules for how whistleblowing cases should be handled. It includes a specific section on external investigations, detailing how the corporate board and executive management should be involved in such cases.</p> <p>If it becomes necessary to sanction an employee who has committed misconduct, the HR department will conduct the necessary employment law assessments.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• The whistleblowing channel, "Trygg Varsling," receives reports and ensures they are handled appropriately and at the correct level.</li> <li>• An external law firm (Bull &amp; Co) can be contacted if the whistleblower wishes to remain anonymous. Bull &amp; Co forwards the report to the whistleblowing channel for processing and acts as a contact point between Avinor and the whistleblower.</li> <li>• The whistleblowing committee reports annually on the activities of the whistleblowing channel to the corporate board and executive management.</li> </ul> <p>Documents</p> <ul style="list-style-type: none"> <li>• PR00339 Leadership and Competence (HR) - Reporting of Unacceptable Conditions</li> </ul>	Safe Whistleblowing / Relevant Line Unit
	<p><b>Evaluation and Implementation of Corrective Actions</b></p> <p>Procedures for timely implementation of measures to correct identified deviations, manage consequences, and ensure that similar incidents do not occur again. Any necessary adjustments to risk analyses should be considered.</p> <p>Execution</p> <ul style="list-style-type: none"> <li>• Review of cases handled through the whistleblowing channel to assess the need for implementing similar measures in other parts of the organization.</li> <li>• Identified corrective actions are implemented at the relevant level in governing documentation and within the organization.</li> </ul>	Safe Whistleblowing / Relevant Line Unit
	<p><b>Quality Assurance of the Anti-Corruption Program</b></p> <p>The anti-corruption program is periodically quality assured.</p> <p>Execution</p>	Group Management

	<ul style="list-style-type: none"> <li>• The corporate audit evaluates the program according to its routines.</li> <li>• The corporate board and executive management request quality assurance of the program based on the information they receive.</li> </ul>	
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#### **INTERFACES AND REFERENCES TO OTHER PROCESSES AND DOCUMENTS**

- **4.24 Corporate Audit**
- **4.17.1 Strategic Risk Management**

#### **ATTACHMENTS**

- **SD00020 Anti-Corruption - Corporate Policy**
- **PR00362 Leadership and Competence (HR) - Ethical Guidelines**
- **PB00032 Corporate Audit - Process**
- **SP00192 Procurement and Acquisition - Template - Agreement on Responsible Supplier Conduct**
- **SP00299 Finance - Authorization Structure in the Avinor Group**
- **PB00067 Finance - Group Accounting - Process**
- **PB00029 Strategic Risk Management - Process**
- **SP00279 Legal - Template - Authorization for Obtaining Tax Information**
- **PB00032 Corporate Audit - Process**
- **Form for Reporting Secondary Occupations**
- **Form for Assessing Personal Impartiality**
- **Information Page with Contact Details on the Intranet and avinor.no**
- **PR00339 Leadership and Competence (HR) - Reporting of Unacceptable Conditions**