OFFICE TRANSLATION

COMPLIANCE – PROCESS

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Valid for: Avinor AS, Svalbard Airport
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1 PURPOSE

The compliance functions in Avinor are group-wide and have the primary purpose of ensuring conformity and adherence to laws, regulations, directives, and internal guidelines.

2 DESCRIPTION

The process shall ensure that Avinor works proactively, advisory, and in a controlling capacity. This includes the following areas:

- Anti-corruption
- Fraud
- Sanctions regulations
- Work-related crime
- Data protection
- Responsible business practices
- Social sustainability
- Whistleblowing
- Operational certificates and approvals for Avinor AS and Svalbard Airport AS

3 IMPLEMENTATION

Prevention

No.	Activity	Executer
1	**Monitoring of Compliance Risk** Continuously monitor and assess internal incidents to ensure that the group complies with legal requirements and internal guidelines for protection against compliance risks. Evaluate whether incidents necessitate changes to existing procedures. Continuously monitor new legal requirements, regulatory demands, sanction requirements, and emerging practices within compliance areas. External monitoring may also include tracking incidents related to contractual parties (third parties). **Execution** • Group Audit (see process 4.14.1) • Whistleblowing • Objectionable conditions involving third parties (contractual parties) • Breaches of ethical guidelines (employees) • Legal and regulatory requirements, national and EU • Sanction requirements • Country risk (environment, climate, and ethics) **Documents** • **SD00020** Ethics, Corporate Social Responsibility, and Diversity - Group Policy • **PR00362** Leadership and Competence (HR) - Ethical Guidelines • **PB00032** Group Audit - Process • **SD00059** Compliance - Embedding Accountability in Own Operations • **PR00556** Compliance - Due Diligence in the Supply Chain • **VD00149** Compliance - Objectionable Conditions in Avinor's Audit of Contractual Parties	Compliance officer
2	**Preventive Routines** Acquire updated knowledge within compliance areas through industry collaboration and memberships in organizations such as Ethical Trade Norway, Transparency International Norway, the UN Global Compact, and other relevant networks. Based on an annual assessment and prioritization of compliance risks, it may be relevant to plan and conduct investigative audits as a preventive measure. **Execution** • Participation in networks (e.g., organized by Ethical Trade Norway) • Collaboration with other public entities • Conducting due diligence assessments and double	Compliance officer

	materiality analyses
	• Audits may include, for example:
	  ○ Checking how many employees have completed training in ethical guidelines
	  ○ Verifying compliance with compliance routines, such as the implementation of IDD (Integrity Due Diligence)
	Documents
	• **IN04082** Compliance - Background Checks of Third Parties	

3	**Whistleblowing/Objectionable Conditions** The whistleblowing channel is a mitigating measure designed to capture objectionable conditions both internally and externally. Findings from the whistleblowing channel provide the group with insights into issues that may warrant changes to internal guidelines and procedures. Whistleblowing cases are handled by a whistleblowing committee led by Compliance. The committee consists of the chief safety representative and two Avinor employees, in addition to the compliance officer. **Execution** • Internal whistleblowing • External whistleblowing • Whistleblowing via an anonymous channel **Documents** - PR00339 Leadership and Competence (HR) - Whistleblowing of Objectionable Conditions - Compliance - Objectionable Conditions in Avinor's Audit of Contractual Parties	Compliance officer
4	**Independent Monitoring and Oversight of Operations** Independent monitoring and oversight of operational activities are conducted to ensure documentation of compliance with applicable procedures and manuals. The activity may include monitoring of policies, responsibilities and roles, manuals, logs and recordings, training and training manuals, availability of necessary resources, as well as the management system's procedures and manuals. **Execution** Independent monitoring and analysis of information can originate from the following processes/activities: • Power BI: Compliance Performance Indicators (CPI) • Management reviews • External suppliers and partners • Line self-assessments	Compliance Monitoring Manager

	• Operational risk management • Deviation handling • Registered changes • Internal and external audits and other monitoring of the management system (SMART) • Third-party inspections	
5	**Privacy/GDPR** Avinor has appointed a Data Protection Officer (DPO) to provide guidance on privacy-related matters. The DPO is part of the Corporate Legal Department. **Execution** The role and responsibilities of the Data Protection Officer include: • Receiving and reviewing notifications regarding the processing of personal data within the organization and maintaining a publicly accessible record of these. • Ensuring that the organization's management has established a system for internal control. • Assisting individuals registered with the organization (customers/citizens) and its employees. • Acting as an advisor to the person responsible for the processing of personal data. • Highlighting breaches of the Personal Data Act to the management. • Serving as a contact person for inquiries from the Norwegian Data Protection Authority (Datatilsynet). • Staying informed about developments in the field of data protection.	

Analyze and processing of information

No.	Activity	Executer
1	**Conduct Risk Assessment** Compliance risk assessments shall be conducted annually. The risk assessments must cover all parts of the organization and also take into account other strategic and operational risks. The compliance function shall carry out activities in accordance with the annual plan established by the Executive Vice President of Organization and Corporate Support. The plan is updated as needed in the event of significant changes in the risk landscape. **Execution** • Annual review of compliance risks and risk matrix/measures • Annual review with management/board **Documents** • SD00059 Compliance - Embedding Accountability in Own	Compliance Officer

	Operations	
2	**Management of Risks/Deviations** Deviations or risks identified through preventive work shall be addressed through further actions, such as action plans. Group Compliance is responsible for following up with the relevant departments that own the deviations. **Execution** • Follow-up on assessments from due diligence reviews • Follow-up on deviations within compliance areas • In connection with whistleblowing, assess, implement, and escalate if necessary • Develop action plans • Assign accountability • Ensure that measures are implemented **Documents** • PR00556 Compliance - Due Diligence in the Supply Chain	Compliance Officer

3	**Conduct Verification Activities of Operations**
	Verification activities are carried out to ensure a proper foundation for implementing necessary and appropriate measures in operational activities.
	
	Execution
	The following independent verification activities may be utilized:
	• Compliance Performance Indicators (CPI)
	• Avinor AS and Svalbard Airport AS - Audit Program
	  ○ Archive number: 20/02688
	  ○ See process 4.14.1 Audit
	• PR00010 - Conduct Other Verification Methods:
	  ○ Interviews
	  ○ Document reviews
	  ○ Inspections
	  ○ Surveys
	
	Documents
	• IN01053 Audit - Prior Audit
		Compliance Monitoring Manager

Reporting of Information

No.	Activity	Executer
1	**Plan and Conduct Training** To reduce compliance risks, training is a key activity for the function at all levels of the organization. **Execution** • Annual ethics dilemma training with the board and management	Compliance Officer

	• Annual e-learning course for all employees • Training in governing documents and procedures as needed • Dilemma training and targeted training in departments and functions with compliance risks as needed **Documents** • PR00362 Leadership and Competence (HR) - Ethical Guidelines • SD00020 Ethics and Corporate Social Responsibility - Group Policy	
2	**Prepare Reports** Group Compliance reports both internally and externally on compliance matters within the organization. Additionally, continuous reporting is provided to the CEO and management in the event of undesirable or serious incidents/compliance risks. **Execution** • Semi-annual reports to the CEO • Annual reporting to the board on compliance risks and recommended measures • Prepare an annual statement for the Transparency Act • Annual Group Report • Annual report to Ethical Trade Norway **Documents** • SD00059 Legal - Embedding Accountability in Own Operations	Compliance Officer
3	**Reporting on Independent Monitoring of Operational Operations** The activity ensures that the Accountable Manager and delegated responsible parties from the Accountable Manager, through reporting lines/C-SRB, are informed of the current status to ensure the effective implementation of necessary measures. The Compliance Monitoring Manager shall report directly to the Accountable Manager and delegated responsible parties from the Accountable Manager if immediate actions are required. The Compliance Monitoring Manager may report analyzed information to the Accountable Manager and delegated responsible parties in the organization to ensure the effective implementation of necessary measures. **Documents** • PR00449 - Organization and Management of Daily Operations - Meeting Overview	Compliance Monitoring Manager

4 INTERFACE, REFERENCES, AND ATTACHMENTS

3. Requirements Management
   4.8 Contract Management
   4.11 Monitoring and Reporting
   4.15 Deviation and Incident Management
   4.2 Organization and Management of Daily Operations, Including Meeting Overview
   4.14.1 Audit
   4.14.2 Inspections