

Reporting year 2024

Transparency Act statement

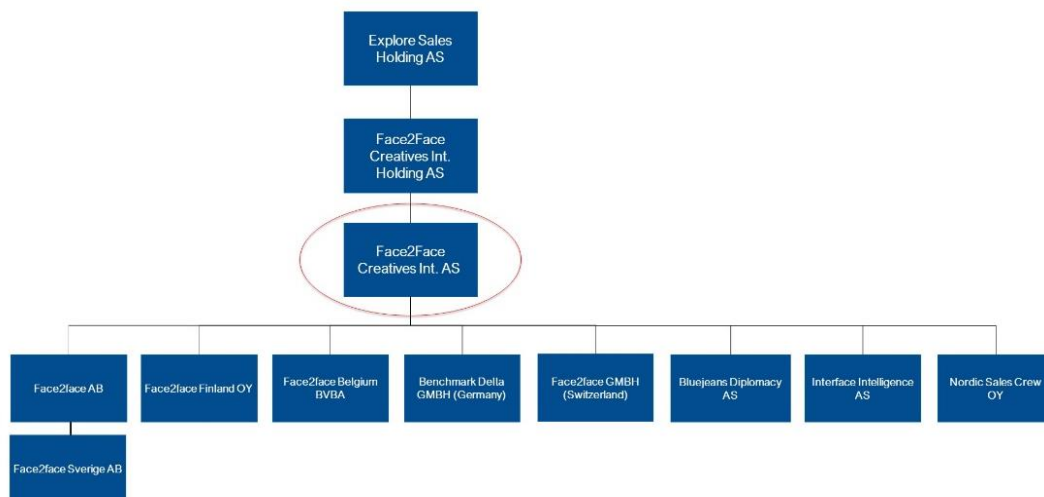
Due diligence for sustainable business practices

FACE2FACE CREATIVES International AS

About the company

Face2face Creatives International AS builds brand knowledge, drives revenue growth, and ensures a predictable, positive return on marketing investments for our clients. Since 1999, we have designed and executed result-driven campaigns for some of the world's leading brands. From our offices in Oslo, Stockholm, Helsinki, Brussels, and Zurich, we collaborate with clients across Europe.

Our campaigns engage audiences, generate measurable results, and build strong, lasting relationships between brands and consumers. The company has subsidiaries in the Nordics and Europe. This statement applies to Face2face Creatives International AS.



Ethical guidelines and routines

At Face2face, we care about our impact on human rights and decent working conditions. Our Supplier Conduct Principles outline our expectations for our suppliers. We expect suppliers to respect the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. This includes ensuring that their operations comply with these principles.

Regarding labor rights and working conditions, suppliers must respect the rights and principles outlined in the International Labour Organization's (ILO) core conventions and its Declaration on Fundamental Principles and Rights at Work. Workers must have the right to organize and participate in collective bargaining without fear of retaliation. Suppliers must inform workers of their rights under national law and must not interfere with the establishment or operation of such organizations.

Suppliers must not use forced or involuntary labor. Employment must be voluntary, and workers must be free to terminate their employment with reasonable notice. Suppliers must not employ children under the age of 15, or a higher minimum age if required by national law. Work performed by individuals under 18 must not be harmful to their health, safety, or development. If child labor is identified, suppliers must immediately take appropriate steps to protect the best interests of the child.

Suppliers must promote equality and diversity in the workplace. Discrimination based on race, gender, sexual orientation, religion, political opinion, or other factors is not permitted. Workers must be treated with respect and dignity. Suppliers must not tolerate harassment, discriminatory practices, or threatening behavior. All workers must have written employment contracts clearly outlining the terms of employment. Wages must be fair and at least meet the legal and industry standards. Working hours must not exceed legal limits, and workers must be entitled to at least one day off after six consecutive working days.

We have internal procedures for reviewing suppliers and for the use of the Supplier Conduct Principles. When entering into major supplier agreements, the company ensures that the supplier has guidelines equivalent to the Supplier Conduct Principles. All major supplier agreements are reviewed and approved by the Chief Financial Officer (CFO) before signing.

The guidelines are available [here](#).

Requests for information and whistleblowing

Requests for access to information under Section 6 of the Transparency Act and notifications of concern should be sent to transparency@Face2facecreatives.com. We also encourage the use of this channel to uncover potential adverse impacts. Any

reported deviations or identified risks will be followed up by the CFO, who will initiate and implement the necessary internal measures.

Due diligence assessments

Face2face is subject to the Transparency Act and has further developed its due diligence assessments throughout the 2024 reporting year. The work is anchored in the executive management team and the board of directors. The board has been involved in the process and has appointed the CFO as responsible for the assessments.

This year, we have focused on expanding the scope of our assessments to include a larger selection of suppliers. Our due diligence assessments are based on a review of our supply chain to identify and follow up with our suppliers. We have also conducted an internal self-assessment to evaluate our guidelines and our impact on human rights and decent working conditions. In general, we consider the risk to be low, as we provide services within the EU and have a manageable supply chain with few physical products. The evaluation shows that we already have effective guidelines addressing human rights and working conditions, but we still see room for improvement in understanding the impact through our suppliers.

Suppliers have been selected based on trade volume and the industry and market in which they operate. Industry and market risks are assessed using the Norwegian Agency for Public and Financial Management's high-risk list. We have selected key suppliers that meet the criteria for size and risk, with the intention of including more suppliers annually. The selected suppliers primarily deliver goods. The headquarters building, individual contractors, and suppliers with a trade volume of less than NOK 100,000 are only included in the overall risk assessment, and not the survey.

Supplier survey

To gather updated information about the conditions at our selected suppliers, we use Factlines. Their software and methodology are well-suited for investigating suppliers, conducting risk assessments, and documenting follow-up activities. We have asked selected suppliers to explain how they address sustainability considerations and to provide supporting documentation.

The questions in the supplier survey and self-assessment cover topics from the UN Global Compact and include issues related to basic human rights and decent working conditions, in line with OECD guidelines. The self-assessment includes the following topics:

- Corporate social responsibility, strategy, and policies
- Supply chain: monitoring, insight, and control
- Risk and due diligence assessments
- Governance systems
- Working conditions and rights
- Indigenous peoples and environment
- Conflict minerals
- Anti-corruption

Discovered actual and potential consequences

Actual negative consequences for basic human rights or decent working conditions

No actual negative consequences for basic human rights or decent working conditions were identified in our assessments.

Risk of violations of basic human rights or decent working conditions

The assessments did reveal some risk factors and areas for improvement among suppliers. Most of these findings relate to missing or weak routines, and no severe violations were identified. The following improvement areas were noted:

1. Missing ethical guidelines for subcontractors: One supplier has not established a Supplier Code of Conduct. This limits the ability to set expectations for responsible business practices among subcontractors and reduces control over conditions in the value chain.
2. Lack of or uncertainty regarding whistleblowing channels: One supplier has not established a whistleblowing service, and another did not answer the question. Missing or unclear procedures may hinder the detection and handling of breaches or other concerning conditions.
3. Breach of ethical guidelines at a producer within the supply chain: One supplier reported that a producer does not fully meet the supplier's ethical standards. The supplier stated that the producer is currently in a remediation process, which is being closely monitored. Although the products concerned were not delivered to Face2face, the issue is still considered relevant as it affects the supplier's overall practices.
4. Lack of insight into breaches of own guidelines: One supplier could not confirm whether there had been any breaches of its ethical guidelines. This may indicate weaknesses in internal monitoring and follow-up procedures.
5. Lack of knowledge about product origin and location: One supplier lacks insight into the country of origin of the goods they trade and the locations of key component manufacturers.

These findings do not represent serious breaches but highlight the need for closer dialogue and follow-up to ensure compliance with the Transparency Act. The suppliers will be monitored in the next round of assessments.

Our measures

We have followed up on findings from previous years, and close dialogue with suppliers has been, and will continue to be, an important part of our efforts.

Oslo, 24th of June 2025

Martin A. S. Alquist

[Martin A. S. Alquist \(24. jun.. 2025 14:17 GMT+2\)](#)

Martin A. S. Alquist

Chair of the board of directors

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Endelig revisjonsrapport

2025-06-24

Opprettet:	2025-06-24
Av:	Hadrien Josse (hjo@face2facecreatives.com)
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Dokument opprettet av Hadrien Josse (hjo@face2facecreatives.com)

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Underskriver maq@face2facecreatives.com oppga navn ved signering som Martin A. S. Alquist

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Dokument e-signert av Martin A. S. Alquist (maq@face2facecreatives.com)

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Avtale fullført.

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