

Reporting year 2025

# Transparency Act statement

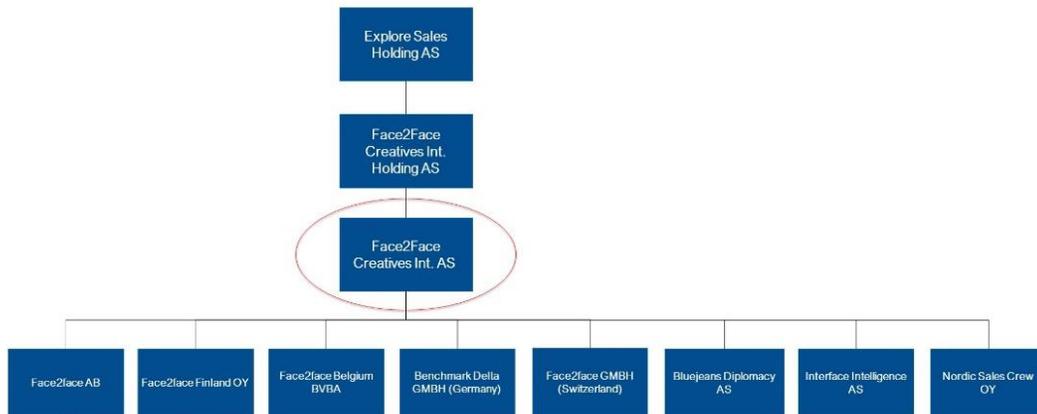
Due diligence for sustainable business practices

## 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 and Helsinki, 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

## Use of Code of Conduct and Supplier Conduct Principles

At Face2face, we are committed to understanding and managing our impact on human rights and decent working conditions. This commitment is anchored in the company's internal ethical guidelines (Code of Conduct) and in the Face2face Creatives Group's Supplier Conduct Principles, which clarify the requirements and expectations placed on our suppliers. The guidelines apply to both suppliers and the use of temporary or contracted labour.

The expectations are incorporated into supplier agreements, under which suppliers are obliged to comply with the Supplier Conduct Principles. Where relevant, suppliers are also required to comply with the Norwegian Consumer Council's guidelines for door-to-door sales services. Furthermore, contractual requirements stipulate that suppliers must ensure that personnel engaged in the delivery of services are qualified and possess the necessary competence, and that deliveries are carried out in accordance with agreed terms and specifications set by the client and/or Face2face.

The company has established internal procedures for supplier review and for the use of the Supplier Conduct Principles. In connection with the conclusion of major supplier agreements, the company ensures that suppliers have guidelines equivalent to the Supplier Conduct Principles if they do not formally adhere to Face2face's own principles. All major supplier agreements are reviewed and approved by the Chief Financial Officer (CFO) prior to signing.

## Contents of the guidelines

With regard to human rights and decent working conditions, we expect our 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 are conducted in accordance with these principles.

In relation to labour rights and working conditions, suppliers are expected to respect the rights and principles set out in the International Labour Organization's (ILO) core conventions and its Declaration on Fundamental Principles and Rights at Work. Workers shall have the right to organise and to participate in collective bargaining without fear of retaliation. Suppliers must inform workers of their rights under national legislation and must not interfere with the establishment or operation of such organisations.

Suppliers must not use forced or involuntary labour. Employment shall be freely chosen, and workers must have the right to terminate their employment with reasonable notice.

Suppliers must not employ children under the age of 15, or a higher minimum age where required by national law. Work performed by people under the age of 18 must not be harmful to their health, safety or development. If child labour is identified, suppliers must immediately take the necessary steps to safeguard the best interests of the child.

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

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](mailto: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.

## Our due diligence assessments

Face2face is subject to the Transparency Act and has further developed its due diligence assessments during the 2025 reporting year, primarily through dialogue with suppliers that had not previously been followed up. The work related to the Transparency Act is anchored in the executive management team and the board of directors. The board has been involved in the process and has appointed the Chief Financial Officer (CFO) as responsible for the assessments.

We have conducted an internal self-assessment to evaluate our impact on human rights and decent working conditions. Overall, the risk is considered low, reflecting that our services are delivered within the EU and that we operate with a transparent supply chain involving a limited volume of physical products. The assessment indicates that we have established sound guidelines addressing human rights and working conditions; however, we continue to see potential for improvement in our understanding of impacts arising through our suppliers.

The selection of suppliers is based on trade volume and the industry and market in which the suppliers operate. Industry and market risks are assessed in accordance with 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 expanding the scope to include additional suppliers annually. The headquarters building, individual contractors, and suppliers with a trade volume below NOK 100,000 are included only in the overall risk assessment. In certain cases, we have also assessed suppliers that we anticipate engaging going forward, in order to direct our focus towards them.

## 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

In this year's assessment, no significant risk factors were identified among our suppliers. We experience constructive dialogue with our suppliers and receive responses to the requests we send.

## 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, 27.02.2026

A handwritten signature in black ink, appearing to read 'Martin A. S. Alquist', with a horizontal line drawn through the middle of the signature.

Martin A. S. Alquist

Chair of the board of directors

# FACE2FACE - Transparency Act Statement 2025 1.0

Endelig revisjonsrapport

2026-03-02

Opprettet:	2026-03-02
Av:	Hadrien Josse (hjo@face2facecreatives.com)
Status:	Signert
Transaksjons-ID:	CBJCHBCAABAA0xj2TzQ4mL8NleLwFV_4ui5mpCEMzQi0

## "FACE2FACE - Transparency Act Statement 2025 1.0"-historikk

-  Dokument opprettet av Hadrien Josse (hjo@face2facecreatives.com)  
2026-03-02 - 08:27:40 GMT
-  Dokument sendt via e-post til maq@face2facecreatives.com for signering  
2026-03-02 - 08:27:44 GMT
-  E-postmelding vist av maq@face2facecreatives.com  
2026-03-02 - 15:05:43 GMT
-  Dokumentsignering delegert til Martin Alquist (martin.alquist@face2face.no) av maq@face2facecreatives.com  
2026-03-02 - 15:05:48 GMT
-  Dokument e-signert av Martin Alquist (martin.alquist@face2face.no)  
Signaturdato: 2026-03-02 - 15:05:58 GMT - Tidskilde: server
-  Avtale fullført.  
2026-03-02 - 15:05:58 GMT