



Corporate Sustainability & Responsibility Report 2017



COMMITMENT + ACTION + DATA = OUTCOMES

This Corporate Social Responsibility (CSR) report identifies the sustainability and responsible business development initiatives that Atea undertook throughout 2017. It showcases how we look at the complete value chain in our operation. This includes looking at how social, ethical and environmental risks are managed, and identifying where efforts are having a positive impact in places we operate worldwide. It also identifies where we can do more to make a difference.

Our CSR report covers the entire Atea Group. All data and activities reported occurred between January 1, 2017 and December 31, 2017, unless stated otherwise. Atea reports according to **GRI Standards** and the criteria as set by **UN Global Compact**. In addition to this, we have also integrated the Sustainable Development Goals (SDGs) in this report.



With support from EY's Climate Change and Sustainability Services team.

Content in this report

1) COMMITMENT

Letter from Atea's CEO	4
A message from Atea's Group Sustainability Officer	5
Overview Corporate Social Responsibility Achievements	6
About Atea	7
Talking to Stakeholders	9
Materiality Assessment	10

2) ACTION

Atea's role in meeting Sustainable Development Goals	13
Atea's SDG-focused activities	14
People	16
Society	21
Responsible sourcing	27
Environment	34
Ethics & governance	42

3) DATA

GRI Content Index	48
Management Approach of Disclosures	52
Communication on Progress	57
Key Figures Group (2013-2017)	58

COMMITMENT

Letter from Atea's CEO	4
A message from Atea's Group Sustainability Officer	5
Overview Corporate Social Responsibility Achievements	6
About Atea	7
Talking to Stakeholders	9
Materiality Assessment	10



Letter from Atea's CEO

At Atea, financial and corporate sustainability goals are not at odds with each other in growing a successful company. They are complementary. Together, they allow us to make a positive contribution, both in our local communities and globally.

2017 was another year of record high financial results for Atea. At the same time, we also received numerous recognitions for our work within corporate sustainability. Some highlights I would like to mention:

In April, we received a gold rating for corporate social responsibility by EcoVadis, a highly respected evaluator of supplier sustainability. This achievement ranks Atea in the top 5% of all suppliers evaluated under a collaborative platform that's used by more than 30,000 companies today.

In July, we launched Atea Sustainability Focus, a program through which Atea and Nordic customers of IT engage and coordinate efforts toward electronics manufacturers to influence the industry toward more sustainable production. Also in July, our campaign to promote electronics recycling – "Game of Phones" – was nominated as the best environmental initiative of the year at

Almedalen, the largest annual meeting place for politicians, business and civil society in Sweden. At the same time, our Group Sustainability Officer Andreas Rydell was ranked in the top 3 in Sweden in his field.

In November, Atea Denmark became one of the first companies globally to be awarded the highest international anti-bribery certification: ISO 37001. Atea is committed to conducting our business in an honest and ethical manner, and has a zero-tolerance approach to bribery and corruption. The ISO 37001 certification provides additional assurance that an organization has systems in place to prevent bribery.

We are grateful for the third-party recognitions we have received within corporate sustainability. It strengthens our resolve to continue our work and promote positive change.

To all shareholders, customers, employees and partners: thank you for your ongoing support, investment and confidence in Atea. We're proud of our progress in 2017 across both our financial and sustainability goals - and are eager to continue our work in the year ahead.

Steinar Sønsteby
CEO, Atea ASA



Steinar Sønsteby (b. 1962) joined Atea in 1997 and was managing director of Atea in Norway in 1997-2000 and for Atea in Sweden in 2000 - 2002. After moving back to Norway Sønsteby was CEO of Atea in Norway until 2012 when he became Executive Senior Vice President of Atea ASA. In January of 2014 Sønsteby was appointed CEO of Atea ASA. Before joining Atea he was the CEO of Skrivervik Data AS.

Steinar Sønsteby holds a degree in Mechanical Design from Oslo College of Engineering and a Bachelor of Science in Mechanical Engineering from University of Utah (USA). He also has a finance degree from Norwegian School of Management (BI) and for Training in Management and Human relations from Dale Carnegie Institute.

A handwritten signature in black ink, which appears to read "Steinar Sønsteby". The signature is stylized and fluid.

A year of commitment and momentum

A message from Atea's Group Sustainability Officer

A **solid record of achievement** in 2017, including major progress in the area of corporate social responsibility.

Overall, 2017 was a year of strong commitment and momentum: ambitious work, careful planning and deliberate choices made over the last several years began to bear fruit this year. The response from our stakeholders was very positive. Customers and investors told us they were incorporating sustainability considerations into their business strategies like never before. That's a powerful, positive trend.

In 2017, as part of our efforts to promote environmental responsibility, we launched an in-house program, called Game of Phones. This well-received initiative resulted in increased awareness about the importance of electronics recycling. We also continued our work implementing Atea Sustainability Focus, a campaign to use our position as a leader within IT hardware in the Nordic countries to influence the industry towards more sustainable production. A key outcome of this initiative is to provide the Responsible Business Alliance (RBA) with recommendations from the Nordic IT buyers.

We also improved our governance practices during the last year. We launched an enhanced whistleblower program, making it easier to submit an anonymous whistleblower report. We also developed a science-based climate target, which will help us in our climate mitigation effort years ahead.

I am very proud of our work within corporate sustainability and responsibility. **For context, consider what Atea has accomplished over the past five years:**

- Our reuse and recycle program, GoITloop, has made Atea the largest recycler of e-waste in the Nordic region - handling over one million units since 2012;
- In 2017, Atea Denmark became one of the first companies globally to achieve ISO 37001 certification for our anti-bribery management systems;
- All major operating units in the Atea group have obtained ISO 14001 certification for environmental management;
- Atea was awarded a Gold recognition level for its sustainability practices by EcoVadis, a leading CSR consulting firm;
- Atea received numerous third-party awards, including Excellent Sustainable Supplier 2015 (Swedish Competition Authority), Green Role Model of the Year 2016 (Swedish NGO), Climate Prize 2014 (KTH), and 2016 Industry Leader for Children's Rights (Global Child Forum).

Actions—not promises—shape our common future. Despite challenges in achieving global targets for sustainable development, I am optimistic about the road ahead. Human progress has always been a story about technology solving complex problems. I feel fortunate to be part of a company and industry which is working to create positive change in the world.



Andreas Rydell
Group Sustainability Officer, Atea

Andreas joined Atea Sweden AB in 2012 as Head of Quality and Environment. He recently concluded his period as Vice Chair of the Sustainability Council, created by Swedish IT and telecom companies. Prior to joining Atea, he worked as Quality and Environmental Director at MTR (Metro). He holds MSc and BSc degrees from Luleå University of Technology.

Overview Corporate Social Responsibility Achievements

Awards & Recognitions

GOLD CSR Rating by EcoVadis (2017)

Industry Leader for Children's Rights by Global Child Forum & Boston Consulting Group (2016)

Green Role Model of the Year by Gröna Bilister (2016)

Excellent Sustainable Supplier by the Swedish Competition Authority (2015)

CERO Climate Prize by CERO/KTH (2014)

Memberships & Signatories

- UN Global Compact
- IT Sustainability Council
- Responsible Business Alliance (RBA)
- Responsible Minerals Initiative (RMI)
- UNGC Nordic Network
- Science-Based Target Initiative

Policies & Activities

- Atea *Code of Conduct*
- Compliance Organization
- Whistleblower Hotline
- Data Privacy Policy
- Stakeholder & Materiality Assessment
- Quality Management Systems
- Mandatory training on *Code of Conduct*
- Sustainable products & services
- Wide range of charitable efforts

Reports & Documents

- Sustainability Report (GRI)
- Carbon Footprint Report (GHG)
- Carbon Disclosure Project (CDP)
- UNGC COP (Advanced)

Atea Programmes

- Anti-Corruption Programme
- Supply Chain Programme
- Greenhouse Gas Reduction Programme
- GDPR Compliance Programme

100%

of Atea's core business is
ISO 14001 certified

90%

of supply chain is monitored
by Atea for compliance

-27%

CO₂ reduction since 2007
(see our Carbon Footprint Report for details)

343k

units reused/recycled using
Atea's goTloop operation

ALL

of our employees have undertaken
training for compliance with our
Code of Conduct

5

identified SDGs where our
business has the greatest impact

YES

UN Global Compact Signatory
(since 2010)

100%

of all new manufacturing
suppliers screened using social
and environmental criteria

150+

tons of CO₂ have been climate
compensated

50/50

Gender distribution of Atea's
Board of Directors (female/male)

About Atea

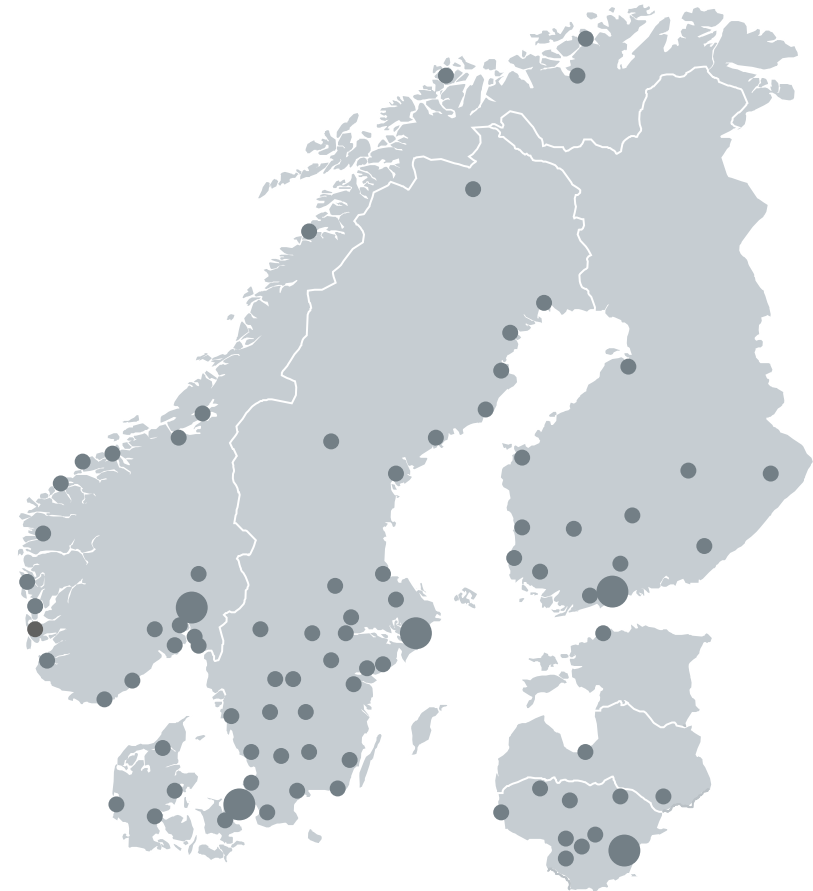
Atea is the **market leader in IT infrastructure for businesses and public-sector organizations** in Europe's Nordic and Baltic regions.

With more than 6,900 employees and 4,000 consultants located in 87 offices across seven countries –Norway, Sweden, Denmark, Finland, Lithuania, Latvia and Estonia – Atea combines a unique breadth of competence in IT infrastructure with a powerful local presence in each market we serve.

Atea offers a full range of hardware and software from the world's top technology companies. Our team of specialist consultants has technical certifications and system integration skills to design, implement and operate solutions for even the most complex IT requirements. As a result, we help customers solve problems and get maximum productivity from their IT investments.

In 2017, Atea had revenue of \$32.4 billion (NOK). We are listed on the Oslo Stock Exchange (ticker: ATEA) and submit all reports as required under the Norwegian Accounting Act.

Since 2010, Atea has also been a reporting member of the UN's Global Compact Initiative. As part of that work, we support and uphold the eight Core Conventions of International Labor Organization, the UN Guiding Principles on Business and Human Rights, and the guidelines of the OECD. Atea's *Code of Conduct* is aligned with the Global Compact's *Code of Conduct*.



TP2B

THE PLACE TO BE

1st

market leader in
IT infrastructure in the
Nordic and Baltics regions

2nd

largest IT infrastructure
company in Europe

18%



share of the Nordic
and Baltic market



6,904

full-time employees

+4,000

service consultants

+7,500

technology certifications

27,500

customers public & private

87



offices

+130

countries delivered to

32.4 

NOK billion

WE BUILD
THE FUTURE
WITH IT

Talking to Stakeholders

Engaging with stakeholders is an **inclusive and continuous** process that allows us to build relationships and create mutual understanding.

Progress starts with building relationships that create mutual understanding. To that end, Atea engages in ongoing, inclusive conversations with stakeholders, sharing experiences and setting priorities in the area of corporate social responsibility. Opportunities for dialogue include company events, job fairs, joint audits and social media. We also receive valuable feedback through employee- and customer- satisfaction surveys.

Collaborative solutions create lasting results. That's why we connect with our industry peers, along with the UN Global Compact Nordic Network and through our membership with the Responsible Business Alliance (RBA). We also base our work on international frameworks, such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, ISO 26000 and the UN Sustainable Development Goals.

Atea stakeholders	Top ranked/prioritized sustainability issues
Customers	Child labor Forced labor Health and safety
Employees	Child labor Anti-corruption Health and safety
Suppliers	Sustainable sourcing Child labor Forced labor
Investors	Sustainable sourcing Child labor Social engagement
Citizens	Hazardous substances Sustainable sourcing Child labor
Media	Sustainable sourcing Forced labor Freedom of association
NGOs	Forced labor Health and safety Sustainable sourcing

Materiality Assessment

For Atea, our materiality assessment results are at the **heart of our future corporate sustainability strategy**. It gives us the ability to set targets and address risks from an environmental, social and economic perspective.

What is a Materiality Assessment?

This is a systems-based method that helps an organization identify, prioritize and validate its most significant sustainability impacts, risks and opportunities. It serves to mobilize an organization's vision and provides context for reporting on progress in meeting its goals.

As a result of in-depth consultations with our stakeholders in 2017, Atea's materiality assessment is presented on the following page as a decision-making matrix in which sustainability topics are grouped into four categories:

Actively address and engage	Assess and engage	Address and engage when appropriate	Assess
Topics included in Atea's strategic sustainability agenda. These are measured and followed-up on regularly.	Topics identified as important by Atea's stakeholders. We will engage and respond to these where possible.	While these are high-impact topics for Atea, we will address these on an as-required basis.	Topics that are not material to Atea today. These will be assessed since their importance might surface in the future.

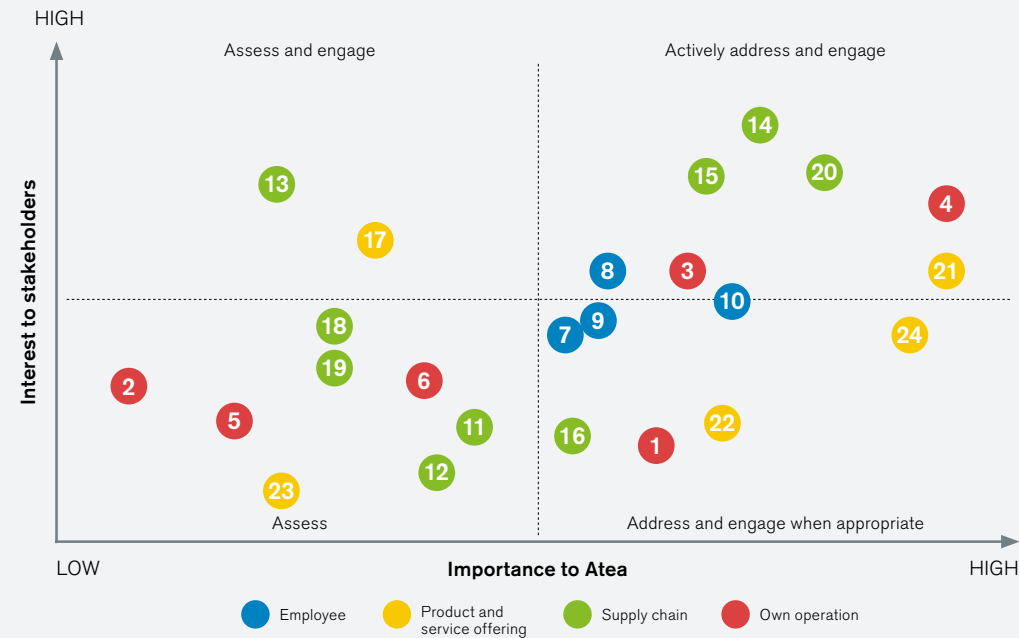
Our findings will serve as the foundation for continued communication, reporting and engagement. We identified issues that can have a significant impact on our business, as well as those where we have the greatest potential to influence change.

Analysis in this area is also essential for conducting risk management. Risks associated with our material sustainability topics are managed within Atea's risk management plan. See Atea's 2017 Annual Report for more details. Since the materiality analysis is important to set Atea's strategic agenda it is performed every second/third year. The next materiality analysis will be performed in 2018.

Our most material topics are grouped as follows: **People; Society; Responsible Sourcing; Environment; and Ethics and Governance.**

Each of these is addressed in the next chapter of this report, entitled "Action: Atea's role in meeting Sustainable Development Goals."





Own operations

1. Energy use reduction within Atea's own operations
2. Minimisation of transport to reduce the environmental impacts of product distribution and employee travel
3. Reduction of greenhouse gas emissions within Atea's own operations
4. Anti-corruption and anti-bribery within Atea's own operations
5. Mitigation of anti-competitive behaviour within Atea's own operations
6. Social engagement and CSR initiatives

Our employees

7. Employee's benefits and terms of employment within Atea's own operations
8. Healthy and safe working environments for Atea employees
9. Training, education and career opportunities for Atea employees
10. Diversity and equal opportunity for Atea employees

Own supply chain

11. Energy use reduction in Atea's supply chain
12. Water use reduction in Atea's supply chain
13. Health and safe working environments at Atea's suppliers
14. Ensuring no child labour is used in Atea's supply chain
15. Ensuring no forced or compulsory labour is used in Atea's supply chain
16. Freedom of association and collective bargaining in Atea's supply chain
17. Minimization of hazardous substances and chemicals in products
18. Reduction of greenhouse gas emissions in Atea's supply chain
19. Reduction of water and air emissions in Atea's supply chain
20. Ensuring sustainable sourcing of tantalum, tungsten, tin and gold (so-called conflict minerals) from high risk human rights problem areas, including for example the Democratic Republic of Congo

Products and service offering

21. Customer privacy, ensuring data security, e.g., on Atea servers is never breached
22. Managing risks of technology disruptions
23. Product energy use during the user phase
24. Ensuring appropriate management of electronic waste at end-of-life

ACTION

Atea's role in meeting Sustainable Development Goals	13
Atea's SDG-focused activities	14
People	16
Society	21
Responsible sourcing	27
Environment	34
Ethics & governance	42

ATEA
SUSTAINABILITY
FOCUS

Atea's role in meeting Sustainable Development Goals

For Atea, sustainable development is more than a promise: it's a commitment to take action to achieve measurable goals. Atea is committed to be a part of achieving these goals and have identified five SDGs where our business has the greatest impact.

How Atea's goals relate to the UN's Sustainable Development Goals

Atea has identified five Sustainable Development Goals (SDGs) that we believe corresponds with our business. In the following sections within this report, we elaborate on the work we perform to meet these goals.



Achieve gender equality and empower women and girls.



Build resilient infrastructure, promote sustainable industrialization and foster innovation.



Ensure sustainable consumption and production patterns.



Take urgent action to combat climate change and its impacts.



Promote just, peaceful and inclusive societies.



More about the UN's Sustainable Development Goals

Established in 2015, the United Nations' Sustainable Development Goals (SDGs) consists of seventeen targets and indicators that member states use to frame their policies. Read more at <http://17goals.org>

Atea's SDG-focused activities

For reporting purposes, here are Atea's SDG-focused activities that fit within the UN's framework. Each of these showcases specific actions Atea has taken in 2017.



Atea believes all people—regardless of gender identity— should be treated as equals and have equal opportunity to work hard and have a rewarding career. Recognizing that the information and communications technology sector has historically been male dominated, we support initiatives that encourage more women to join this field. This includes, for example, encouraging women to choose an education within technology and engineering. Atea also strives towards having a balanced leadership team at all levels within the company.



New, innovative solutions provided by Atea can improve the efficiency of public institutions, municipalities, communities and other groups. Among the benefits of those solutions: better assistance to those who are in need in society, both at home and abroad. For example, digital solutions can be used in schools to minimize the effect of geographical distances. With Internet of Things solutions, Atea contributes to greater public safety, enhancing resource management and sustaining the environment.



Adjusting to responsible consumption and production is important to reduce environmental and health effects. Atea is taking a bold step forward in responsible sourcing of IT components: strengthening our efforts to control our supply chain. In promoting a more circular economy and closing the loop on waste, Atea continues to enjoy the success of its recycling system, [GoTloop](#). Hardware gets reused instead of ending up as landfill. This program is implemented in all countries served by Atea. Under this program in 2017, Atea launched Game of Phones: a successful information campaign to increase recycling of mobile phones.



Atea focuses intensely on carbon-footprint reduction measures in its operations. This requires close collaboration with partners, suppliers and customers to minimize the impact of our products on the environment. To help everyone in its supply chain to make climate-smart choices, Atea works with distributors to find efficient alternatives to transporting goods. Atea also has included environmental requirements in its corporate *Code of Conduct* to reduce the indirect carbon emissions caused by suppliers. To read more about Atea's measures to reduce carbon emissions. See [page 35](#).



Eliminating corruption and bribery is of utmost importance to Atea: it's a matter of trust. Having previously revised our *Code of Conduct* in 2015—with all employees having completed compulsory training on this issue—governance routines were further strengthened throughout 2017. During this period, Atea's compliance officers tested and reviewed the company's internal audits and anti corruption monitoring systems. Atea also made it easier for employees to confidentially raise concerns about potential violations by enhancing its whistleblower hotline.



PEOPLE

Our approach	17
Empowerment	17
Health and safety	18
Diversity and inclusion	18
Facts & figures	19



People

"All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood."

– UN Universal Declaration of Human Rights, Article 1

People are shaped by the conditions where they live and where they work. They thrive best in places where mutual respect, safety and diversity are valued and promoted.

Our approach

People are central to Atea's vision of being "The Place to Be" for employees, customers and vendors. We strive to attract the best to create remarkable solutions. To get there, Atea ensures that it provides healthy, safe conditions in the workplace, and that it gives everyone an equal opportunity to succeed and thrive within its corporate culture. Not only do we work hard to meet both national and international labor laws in every country in which we operate, Atea also sets its sights on even higher goals. We seek to promote greater empowerment, wellness and confidence in all our people.

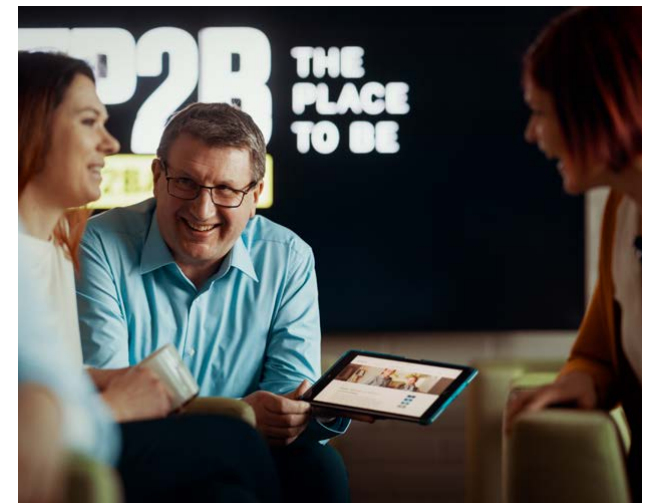
Approximately 90 percent of Atea employees are covered by collective bargaining agreements and/or universally binding collective agreements.

Empowerment

Finding ways to boost autonomy and self-determination in people is both important and consistent with Atea values. As part of creating a learning culture for our employees, we ensure they are trained continuously in leadership, management and other areas connected to their IT expertise.

Common guidelines have been established for recruitment activities. This ensures Atea is attracting and hiring skilled professionals across the organization. Extensive competence training is conducted in all parts of the organization. Employee surveys, along with goal identification and professional development interviews are conducted with employees regularly. An introduction program has been implemented in every country to quickly integrate new employees.

Through Atea Academy—our e-learning platform—our employees receive training on business systems, values, ethical guidelines and corporate culture. All employees are required to successfully complete an examination on Atea's *Code of Conduct* and sign a confirmation that they will comply fully with its contents.



Health and safety

Working with IT means spending many hours of the day in front of a computer. It's essential, therefore, that we focus on encouraging our employees to participate in activities related to health and wellbeing. Atea employees have the right to a healthy and safe workplace, and the working conditions within our organization meet or exceed legal requirements in every country in which we operate. We also comply with the conventions of the UN Global Compact and the International Labor Organization. Hazards are identified and monitored to prevent accidents and occupational illness. Workplace guidelines are monitored to ensure a healthy, safe environment. In addition, the company provides a range of healthy lunch choices for its employees in its largest offices, and encourages participation in athletics through Atea-sponsored sporting events. As a significant outcome of these efforts, Atea was recognized in 2017 as the healthiest company of the year in the Stockholm region by Feelgood: one of Sweden's leading health companies.

Diversity and inclusion

Promoting gender equality, inclusion and diversity in the workplace are core values at Atea. Our employees are respected and valued for their skills and abilities—no matter their gender, nationality, religion, age or physical mobility. A diverse workforce is one that reflects the society in which it operates. The closer we get to achieving diversity, the better we serve our clients.

Atea also strives to prevent workplace discrimination. Our efforts are consistent with the prescriptions of the Anti-Discrimination Act. Atea's management promotes equality of opportunity within its employment practices. During Autumn 2017, our management teams in many countries of operation publicly expressed their support for the worldwide #metoo initiative. Atea has zero tolerance for discrimination and sexual harassments in the workplace. It also recognizes that the best way to prevent these issues from occurring in the first place is by seeking more gender parity in its workforce. That remains a challenging issue in this sector. The World Economic Forum highlighted this issue in 2017. Citing a McKinsey study, it found that "women made up 37% of entry-level roles in tech (compared to 45% in the overall sample), and only 25% advanced to senior management roles. Just 15% reached the C-suite."

While the percentage of female employees within Atea is consistent with the industry, that's a low bar for measuring progress. Atea believes diversity is good for productivity and women are a growing portion of the global talent pool, we strive to recruit women at all levels and promote activities that ensure they remain with Atea. We strive towards having at least one female candidate in all manager recruitment processes. To increase diversity in our industry, Atea supports university-focused initiatives that encourage more women to choose engineering and technology-oriented education. We also encourage the recruitment of people with disabilities or special needs and make necessary modifications to workplace environments so that they are able to perform their work.

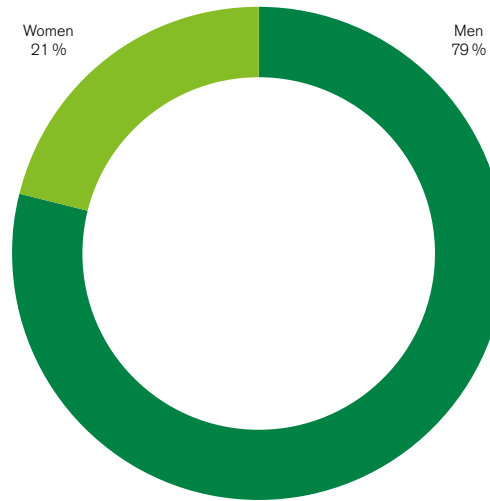
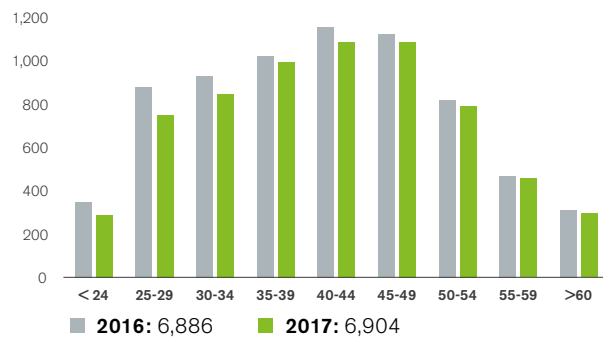


6,904

Total numbers of full-time employees

Age Breakdown Atea Group

2016 – 2017



Gender percentage in Atea Group

3.2% Norway
1.4% Sweden
5.9% Denmark

2.1% Finland
2.0% Baltics
4.1% Shared Services

Sick leave per country



50% women
50% men

Gender distribution Board of Directors



2 of 8 members
less than 50

Age distribution Board of Directors

3.0%

Sick-leave
Atea Group

0

Occupational
health injuries





SOCIETY

Our approach	22
Making a difference: Preventing election fraud	24
Making a difference: Learning environment of the future	25



Society

"A community is like a ship; everyone ought to be prepared to take the helm."

– Henrik Ibsen

Information technology connects people across the world, and eliminates traditional borders between nations.

We all become part of a global society and are directly impacted by events and conditions far from home. At the same time, our ability to play a positive role in the lives of others across the world is greater than ever before.

Our approach

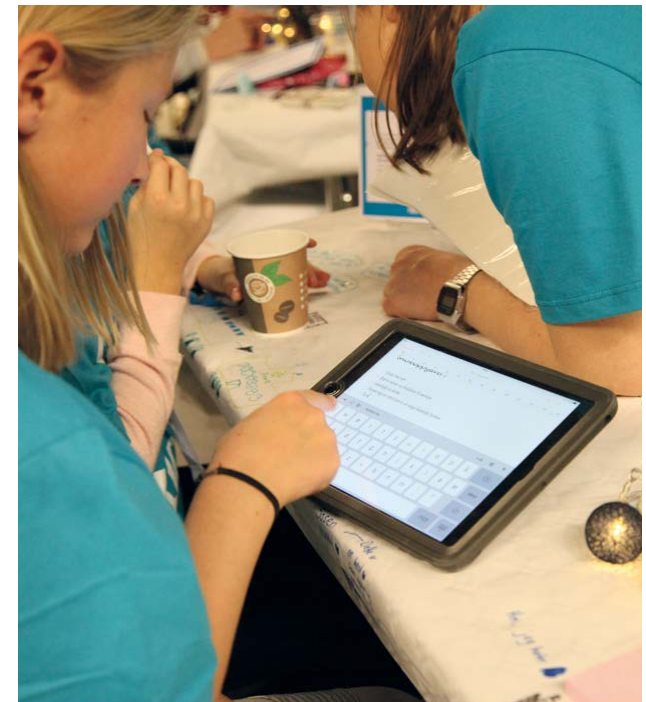
At Atea, we choose to make a difference in the world by employing the same knowledge, creativity and energy with which we serve our customers. Many of our charitable activities focus on improving the lives of children, whose early development and education are critical to the future of their nations and communities.

In 2017, here are highlights of charity-based activities undertaken by Atea and its employees:

- Through **Atea Sweden's** Helping Hands fund, many different initiatives and social events are supported. During 2017 we made donations to the "Children are not for sale" campaign run by Musikhjälpen ("Music aid") and to a campaign run by Radionhjälpen to prevent the famine disaster in Yemen and many countries south of Sahara. We also supported a center for women in DR Congo among other projects.
- During the Arendal Week in 2017, an alliance headed by **Atea Norway** launched "Children's digital rights", a set of fundamental rights to prevent digital class divides from arising in schools, and which the initiators believe should apply to all Norwegian pupils. The initiative was followed up with the "Class of the Future", inviting schoolchildren to contribute with their ideas for how education challenges can be met using technology. Atea has also contributed with PC equipment, monitors and various other items free of charge for Se Meg (See Me), an organisation that works for children and young people who experience challenges in their lives.



- **Atea Denmark** has been running an asylum children project that resulted in the delivery of 400 used PCs to all unaccompanied asylum children in Denmark. We have also sponsored Børnefonden (Children's Fund), allowing 50 children to attend school and gain access to medical care. In addition, this sponsorship has made it possible to construct latrines, wells, offices, warehouses and new classrooms in primary schools and to install solar panels at two schools and two health clinics.
- Since 2013, **Atea Finland** has been cooperating with the Finnish Red Cross, collecting money for different campaigns. During 2017 this included the Chain Reaction campaign, the Hunger Day campaign and a Christmas Spirit campaign. In addition, we have supported the Rescue Children Association and Tukikummit Foundation with individual donations.
- In the **Baltics**, Atea Global Services (AGS) serves to help the local community. Since 2014, it has been organizing and conducting a summer event for orphans: 180 children and 29 teachers from seven different orphanages were invited to a day of creative workshops, treasure hunting, concerts and other activities. The event has now become a tradition that AGS plans to repeat in coming years.
- **Atea Baltics** for several years has been actively involved as a founder of non-profit NGO organization "Langas i ateiti" ("Window to the future"), the main goal of which is to add to the development of the information society across all demographics. Atea Baltics has not only supported the NGO financially but also has been actively involved in the national campaigns organized by "Langas i ateiti". The most well-marked events are national campaigns: Safer internet week and Get Online week, which invited volunteers from Atea Baltics to provide lectures on safer internet issues for the school community. During these campaigns, 300 primary school teachers were trained online in coding basics and over 200 kids were introduced to the most important rules handling their personal identity online and safe behavior.





MAKING A DIFFERENCE: PREVENTING ELECTION FRAUD

Election fraud is a challenging problem in some African countries today due to a lack of reliable records registering birth and citizenship. Thus, it's difficult to control whether people vote more than once at polling stations during elections. The Republic of Somaliland wanted to tackle this challenge. As an emerging democracy that was seeking international recognition as an independent state, it was very important to them to be able to hold free, fair and credible elections.

In collaboration with its partners, Atea Denmark group provided an iris scanner solution that helped solve this

challenge. This made it possible to quickly and reliably identify every voter who showed up at polling stations on election day. To be eligible to vote, each voter had to provide an iris scan at one of over 300 registration sites across the country.

Approximately 700,000 voters participated, after which they received an authorized election card.

As a result the Republic of Somaliland today has the most advanced election registration system in the world. "This is a very exciting project and we are proud to have played a part in making a difference," says Nils Løwe Larsen,



International Sales Manager at Atea. "Many other countries today are keenly observing this technology in use here because of its enormous potential to prevent election fraud."

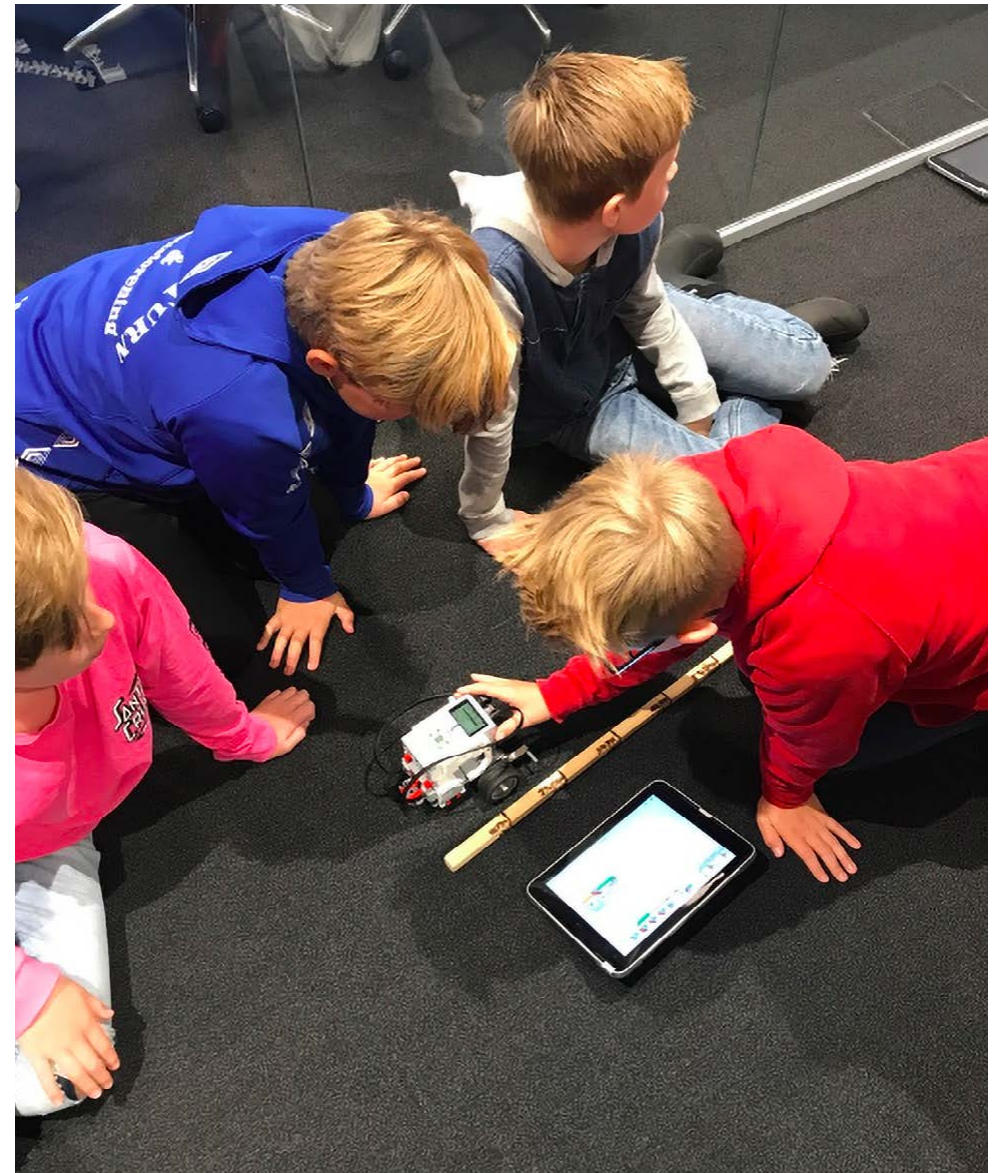
Faster and more secure than fingerprint technology, Atea's iris scan solution is playing a pivotal role in creating safeguards to ensure correct processing of personal data and to prevent voter fraud. "It's been vital for us to ensure full transparency," adds Løwe Larsen. "That was pivotal in proving to local authorities and citizens alike that this was a trustworthy technology to help foster fair elections in an emerging democracy."

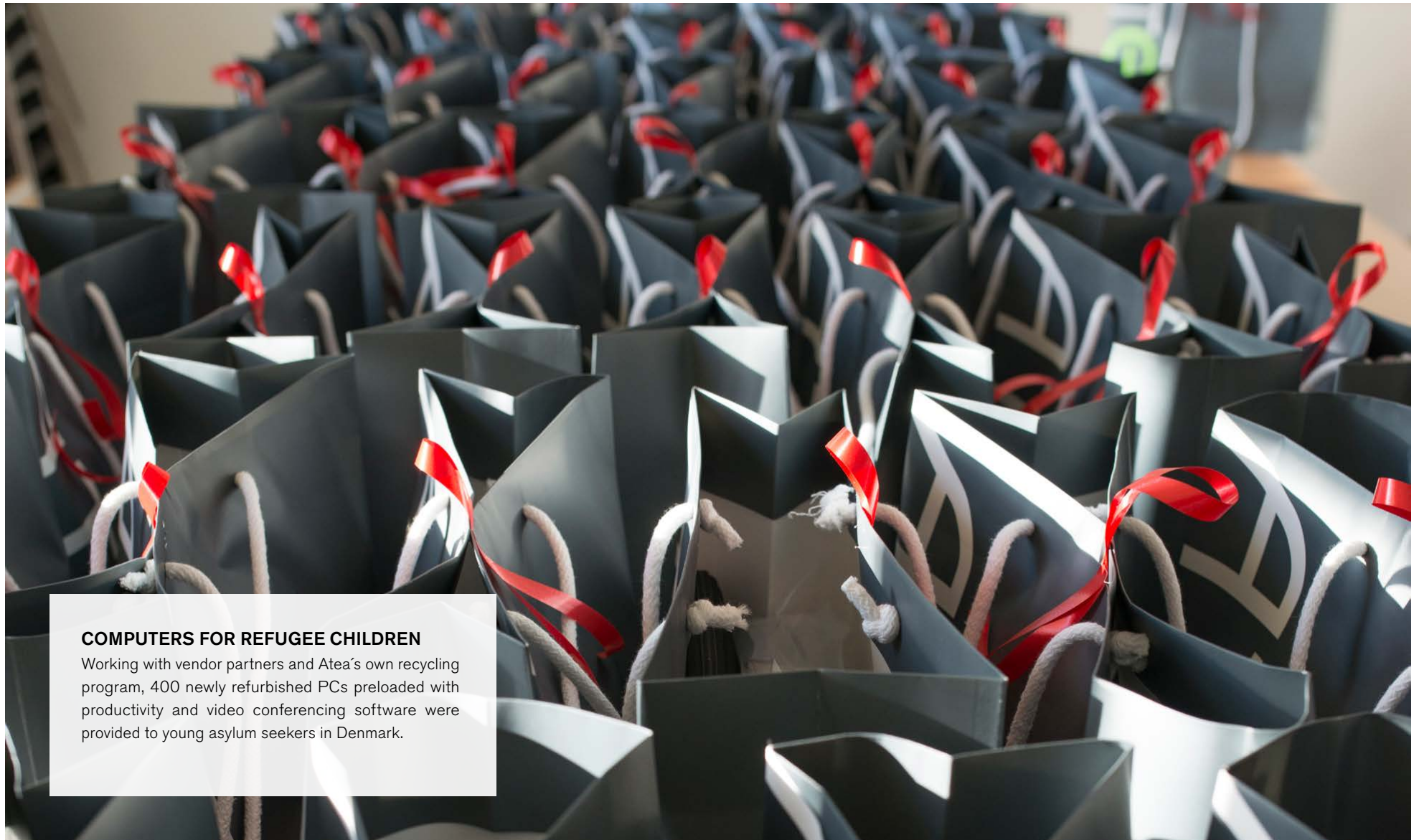
MAKING A DIFFERENCE: LEARNING ENVIRONMENT OF THE FUTURE

Nordens Plads is a Denmark-based school for children who have learning disabilities. Here, using technology as a daily part of student activities is helping to create a dynamic learning environment.

Partnering with the school's special-needs educators, Atea's IT specialists designed a new digital classroom. It is an interactive sensory and movement room, which sets new standards for learning. The room is designed so that sound, light, smells, furniture, walls, floors and general layout create an atmosphere to stimulate and motivate students.

This project was made possible thanks to donations from Atea employees. As a result, teachers at the school are able to share their experiences with others: showcasing how this special learning room can improve outcomes for students and schools alike. Learn more about this school and this important project at www.svnp.dk.





COMPUTERS FOR REFUGEE CHILDREN

Working with vendor partners and Atea's own recycling program, 400 newly refurbished PCs preloaded with productivity and video conferencing software were provided to young asylum seekers in Denmark.



RESPONSIBLE SOURCING

Our approach	28
Developing a strong management system	28
Q&A with Chiara Selvetti	28
Building relationships and partnerships	29
Focus on improvements	30
Understanding our ecosystem	30
Atea sustainability focus: Be heard	31
Challenges in our supply chain	32

Responsible sourcing

"We are made wise not by the recollection of our past, but by the responsibility for our future."

– George Bernard Shaw

Today's electronic industry supply chain is incredibly complex. Each individual component that goes into a product involves a large number of groups working together across the globe.

Our approach

For Atea, responsible sourcing hinges on adopting a multi-stakeholder approach. That's how the right systems can be developed to identify and mitigate risks within labor, ethics, human rights, management, as well as health and safety. Gaining an understanding of how and where device components are made is a major undertaking, but it's necessary. It gives Atea a complete picture of the sustainability challenges within our supply chain.

That deliberate choice has proven to be valuable.

Governments, NGOs, investors, customers, employees and other industry stakeholders have all made clear that they have increasing expectations about how companies account for their supply chains. We support that shift. Even though we are not the manufacturer

of the devices we sell, we have a role to play in ensuring that they are assembled in an ethical and responsible manner.

The responsible sourcing of minerals remains one of the key challenges for the electronics industry. Mining affects the environment, the surrounding communities and human rights. Since business operations in this area tend to be unsustainable, paired with poverty and poor governance in the region, mining can result in increased conflict and long-lasting negative effects.

To fully address these challenges, Atea has developed a four-point response:

- developing a strong management system;
- building relationships and partnerships;
- focusing relentlessly on improvements; and
- gaining a deeper understanding our ecosystem.

Each of those steps comprises Atea's responsible sourcing journey.

Developing a strong management system

In 2017, we updated our *Supplier Code of Conduct*: one that had originally been adopted in 2016. New standard agreement templates for new suppliers were enhanced, along with sustainability clauses. Based on the Responsible Business Alliance (RBA) *Code of Conduct*, Atea's *Supplier Code of Conduct* clearly states the expectations we have of our suppliers and is available on Atea's website.



Q&A with Chiara Selvetti, Supply Chain sustainability manager, Atea Sweden



What are the key highlights of 2017?

The launch of Atea Sustainability Focus and our participation at the OECD Forum and at the UN Forum on Business and Human rights conference in Geneva.



Lessons learned?

The past year has confirmed that our work requires patience and relentless focus on what is material. In line with our goals we now cover a larger number of suppliers, some of whom are less keen on transparency and have less mature sustainability management systems. We work relentlessly to secure those improvements that are of essence, to ensure that our customers can trust us as a partner and the brands we choose to grow with.



Plans for the future?

2018 will bring a renewed focus on pushing for greater transparency in our suppliers' sustainability communication, in line with the recently published Atea Sustainability Focus.

Finally, while maintaining a strong focus on due diligence and on minimising risks, we will see to encourage more clearly our suppliers' work with sustainable innovation.

Atea's Supplier Code of Conduct



Under this system, in 2017 Atea successfully reached its target of assessing 90% of its suppliers. That puts us well within range of meeting our overall goal of assessing 95 % of suppliers by 2020. Using our *Supplier Code of Conduct* as a framework, we not only assess our suppliers on their sustainability initiatives: we also look at the degree of maturity of their management systems, along with their willingness to take responsibility and increase the transparency of their supply chain.

In 2017, Atea collected information through ongoing dialogue with our partners, customers and other stakeholders, through reports by suppliers and NGOs, through our membership in the RBA and the use of RBA risk-assessment tools. We also participated in four on-site visits to supplier facilities. Our sustainability efforts resulted in EcoVadis giving our management system a clean bill of health: awarding Atea with a gold-level rating. This places Atea among the top 5 percent of all assessed companies.

In the event of identified shortcomings in the supply chain, we collaborate with the supplier to collect additional information and formulate a corrective action plan. This includes informing affected customers to promote transparency and dialogue to achieve improvement across the industry. This way, we can work on raising both our and our customers' concerns and manage demands further up in the supply chain. If risk management measures are deemed to remain inadequate, Atea holds the right to terminate business with the supplier.

In 2017, we instigated follow-ups on four suppliers where Atea had identified room for improvement in terms of transparency and willingness to engage. Three out of the four follow-ups conducted during the year resulted in the suppliers reaching Atea's minimum standards. And follow-up is still ongoing for the remaining supplier. As our scope for assessments widens, we notice the trend of slightly less mature sustainability work where the level of transparency is not quite up to the standard of leaders of the industry. Because of this, follow-ups to probe into potential risks will be undertaken for six suppliers in the following year. Also in 2017, we had the opportunity to test our monitoring system, thanks to the work of NGOs and external actors who provided us with increased visibility into layers of the supply chain. We would not have gained that insight without them. As a result, we were alerted to allegations of non-conformance to the *Supplier Code of Conduct* by a tier 3 supplier. We immediately initiated dialogue with the supplier as well as with the RBA. Next, we ensured that the allegations were adequately and independently verified, and that we could follow the improvement process closely. Of the original allegations in that case, a handful were confirmed. A program has been put in place to address root causes, and dialogue remains ongoing between the supplier's management team and the NGO that originally filed the report.

At the time of this report, Atea has not paused or terminated any commercial relationships with suppliers as a consequence of our responsible sourcing assessments.



Building relationships and partnerships

To maximize our influence in the supply chain, Atea strives to make our voice heard by building in-depth relationships and partnerships.

In 2017, we maintained our membership in the Responsible Business Alliance (RBA, formerly known as the EICC). The RBA is a non-profit coalition of electronic companies dedicated to supporting sustainable development within their global supply chains. The name change during 2017 reflects the coalition's expanded scope. It now includes companies with products containing electronic parts. Atea welcomes this wider focus. It means we can now collaborate across various industries with equally complex supply chains and move towards a shared goal of responsible business practices. To that end, for the second year in a row Atea sent senior staff to participate at the RBA annual conference in the United States. The RBA *Code of Conduct* is a set of standards defining social, ethical and environmental areas and issues in the electronic industry's supply chain. It was derived from internationally recognized frameworks, including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises and ISO standards.

In 2017, the RBA's *Code* was updated. Its newest version took effect in January 2018. As a member of this alliance, Atea participated in extensive dialogue and in the vote on making these changes.

With regards to the challenges connected to mining and the supply chain, greater collaboration is vital. That's why in 2017, the RBA merged the two initiatives—CFSI (Conflict-Free Sourcing Initiative) and RRMI (Responsible Raw Materials Initiative)—to create the Responsible Minerals Initiative (RMI). As a founding member of this initiative, Atea assisted in shaping the direction of the RMI. Also of note, Atea's Group Sustainability Officer was invited as a speaker at the 2017 RMI Conference where he provided a detailed review of Atea's approach to responsible sourcing within its supply chain.

Previously, Atea officials have visited mines in the Democratic Republic of Congo to better understand our supply chain and systematically work to identify the choke points through evaluating due-diligence assessments. The definition of Conflict Minerals is sometimes prone to being misunderstood. Atea seeks to ensure that it has in-depth knowledge of the subject so that it can engage fully with various organizations and increase consumers' understanding.

About Conflict Minerals

Under U.S. legislation, the definition of conflict minerals specifically identifies tin, tantalum, tungsten and gold (referred collectively as the 3TGs) regardless of whether they were actually mined in a conflict area as identified by the OECD.

Atea will continue to monitor the responsible sourcing of minerals. As the largest IT company in the Nordic and the Baltics Atea, we are uniquely positioned use our leverage in the industry. We can press for increased transparency from industry and keep educating consumers on the facts about mining in this supply chain.

Elsewhere during 2017, Atea staff attended several events and forums with the aim of boosting relationships with stakeholders. This included attending the OECD Forum in Paris, the United Nations Forum on Business and Human Rights in Geneva, as well as seminars and accompanying suppliers on facility audits in Asia. At all of these events, Atea benefitted from sharing and receiving best practices, highlighting the importance for cross-stakeholder collaboration and building partnerships and relationships for sustainable supply chains.

Focus on improvements

Atea intends to be at the forefront of future developments in the area of responsible sourcing in the IT industry. That means remaining focused on steady improvements in 2018: doing more with the leverage we have, improving our business routines and encouraging organizations within our supply chain to do the same. To get there, Atea will keep engaging with suppliers to foster our close relationships. We will continue to attend forums and seminars and engage in knowledge-sharing and monitoring activities. Continually updating our understanding of supply-chain risks is another key undertaking. There, we will focus more on the

environmental and human-rights impact of our supply chain. We'll also continue to gain first-hand experience in this area through our work with the RBA and RMI.

Our improvement-focused work won't stop there. We also will look carefully at our own ambitions when it comes to the companies we choose to grow with as a group. Atea recognizes that it takes time to make overarching, systemic changes. Given that 2018 is the midway point to our longer-term 2020 goals (*95 % of supply chain monitored by Atea for compliance*), this year is the ideal time to undertake that work and review our responsible sourcing efforts to date.

Understanding our ecosystem

Atea firmly believes we must exercise our influence over—and demonstrate our knowledge of—our ecosystem. That's why in 2017, we founded Atea Sustainability Focus (ASF). It is designed to use our position as a leader within IT in Nordic countries to influence the industry so that it keeps moving in a sustainable direction.

The ASF includes an Advisory Board, through which it receives input from 250 Nordic IT buyers and industry analysis from KTH Royal Institute of Technology. Board membership consists of representatives from nine Nordic companies—each is an industry leader in sustainability and digitalization. It will produce a report annually, covering areas of common concern.

ATEA SUSTAINABILITY FOCUS: BE HEARD

Atea's new initiative, Atea Sustainability Focus (ASF), is your chance to help shape sustainability work in the IT industry. Since Sweden and the Nordic region are each globally recognized as sustainability leaders, ASF is ideally positioned to make a difference. Here, with our high concentration of leading sustainable businesses, being part of ASF puts you in direct contact with many influencers and model corporate practitioners.

There is no shortage of sustainability challenges within IT and the electronics industry today. With ASF, we seek to influence these industries so that they keep moving in a sustainable direction. Through its Advisory Board, the ASF is inviting Nordic customers to engage in an annual dialogue. It's an opportunity to share your perspective about the pace and priorities for the global sustainability agenda within IT.

Challenges in our supply chain

MINING

Over 60 metals and minerals and virtually all rare-earth elements end up in electronics products. An estimated 50% of the world's cobalt supply is located in the Democratic Republic of Congo. That country ranks 176 on the human development index and has been the scene of some of the worst conflicts since WWII.

SOCIAL IMPACT: HIGH
ENVIRONMENTAL IMPACT: MEDIUM

CORE COMPONENTS

IT manufacturing (i.e., hard drives, printed circuit boards and screens) varies substantially in terms of impacts. For instance, battery manufacturing may release toxic metals into the environment, and a large manufacturing facility of integrated circuits can consume up to 4.8 million gallons of water daily. Semiconductors for integrated circuits are often manufactured in Malaysia, where incidents of human trafficking and forced labor have been documented.

SOCIAL IMPACT: MEDIUM-HIGH
ENVIRONMENTAL IMPACT: MEDIUM-HIGH

BASIC COMMODITIES

Metals derived from minerals, as well as chemicals and plastics, often enter the electronics supply chain in goods manufactured in China. Silicon is extracted from sand, through water and energy intensive process that requires more than 300 individual steps. Over 500 chemical substances have been identified for use in the manufacturing of electronic components.

SOCIAL IMPACT: MEDIUM
ENVIRONMENTAL IMPACT: HIGH

ASSEMBLY

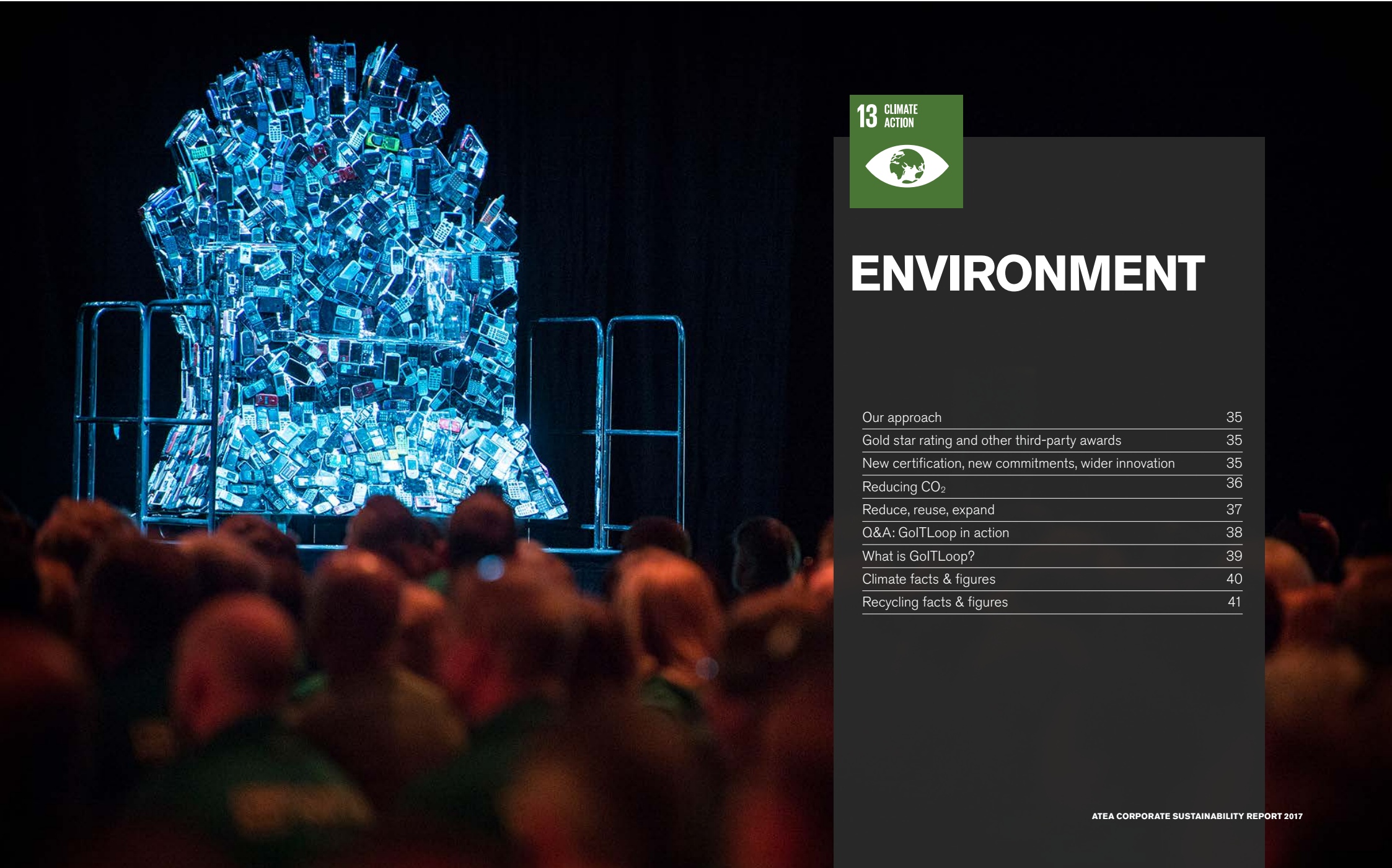
Electronic product assembly occurs mostly in China, where both labor-related and environmental risks are well documented. China has an estimated 60 million "abandoned" children, whose parents work in manufacturing in coastal cities. In factory audits across all RBA membership, excessive working hours remains the single most persistent finding.

SOCIAL IMPACT: MEDIUM-HIGH
ENVIRONMENTAL IMPACT: MEDIUM-HIGH



ON-SITE VISITS

In 2017, Lorna Stangeland, Senior Vice President Supply Chain Management and Andreas Rydell, Group Sustainability Officer (both Atea) participated in on-site visits to supplier facilities in central China.



13
CLIMATE ACTION


ENVIRONMENT

Our approach	35
Gold star rating and other third-party awards	35
New certification, new commitments, wider innovation	35
Reducing CO ₂	36
Reduce, reuse, expand	37
Q&A: GoITLoop in action	38
What is GoITLoop?	39
Climate facts & figures	40
Recycling facts & figures	41

Environment

“Sustainable development—development that does not destroy or undermine the ecological, economic, or social basis on which continued development depends—is the only viable pathway to a more secure and hopeful future for rich and poor alike.”

– Maurice Strong, Opening Statement at the Rio Summit (1992)

All businesses today have a duty to consider the long-term sustainability of their operations and their impact on the planet. Everyone has job to do to make environmentally-smart choices.

Our approach

For Atea, caring about the environment is an extension of caring for our customers. We are all caretakers of our planet: each of us has a role to play in ensuring that growth is sustainable and that we act responsibly with what we make and use. Finding ways to reduce our impact on the environment while promoting responsible growth: both of these have been fundamental goals for Atea for many years.

Gold star rating and other third-party awards

During this review period, Atea was granted a gold CSR rating by EcoVadis. It is a significant achievement. EcoVadis is a highly respected evaluator of supplier sustainability. This achievement

ranks Atea in the top-5 percent of all suppliers evaluated under a collaborative platform that's used by more than 30,000 companies today.

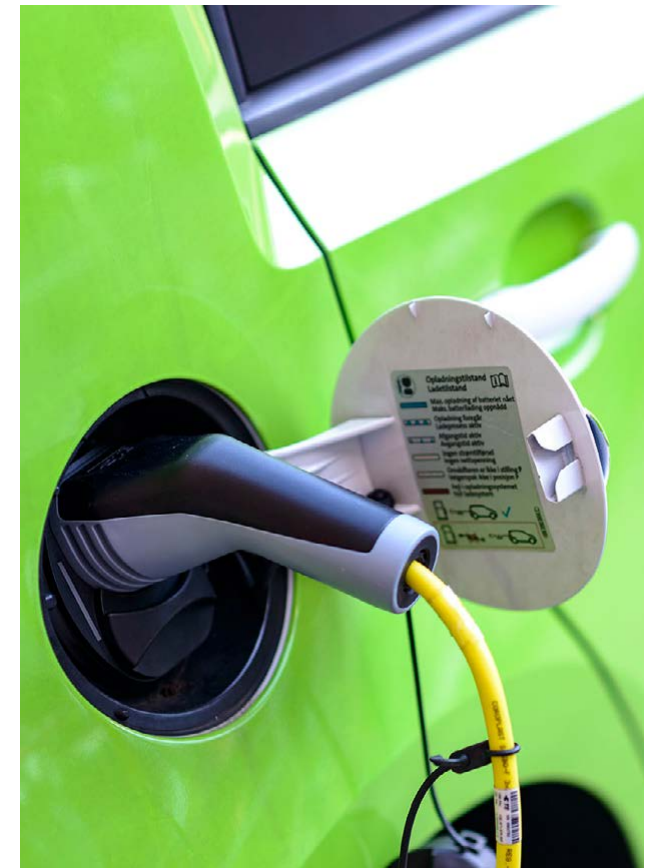
To rate and monitor supplier sustainability, EcoVadis assesses corporate social-responsibility performance covering 150 purchasing categories in 110 countries. Its detailed evaluation criteria includes: labor practices and human rights, environment, fair business practices and sustainable procurement.

Other third-party awards earned by Atea include Excellent Sustainable Supplier 2015 (Swedish Competition Authority), Green Role Model 2016 (Swedish NGO) and Climate prize 2014 (KTH).

New certification, new commitments, wider innovation

Atea has a corporate-wide ISO 14001 certification. This provides us with tools to manage our environmental responsibilities. Specifically, it focuses on environmental systems, as well as specific approaches: audits, corporate communications, labelling and lifecycle analysis, including the environmental challenges that arise from climate change.

Atea also gained tools and deeper insights in 2017 by becoming one of the first companies worldwide to join the Science Based Target Initiative: a joint project between the Carbon Disclosure Project, the World Resources Institute, the World Wide Fund for Nature, and the United Nations Global Compact. It champions



science-based target setting as a meaningful way of boosting a company's competitive advantage in the transition to a low-carbon economy.

In terms of wider innovation in 2017, Atea invested in increased use of renewable energy. This include taking action to significantly increase use electric cars and hybrids within the company's fleet. To support this effort, several sites have greatly expanded the number of charging posts available for these vehicles.

Also of note in 2017, Atea's in-house initiative—Game of Phones—was nominated as the best environmental initiative of the year. This initiative was in response to the fact that of the four million mobile phones sold annually in Sweden, only about ten percent of them are fully recycled, according to the Swedish Society for Nature Conservation. Through this fun game, participants learned more about the importance of device recycling and how easy it is to contribute to reducing CO₂ emissions.

Reducing CO₂

Atea focuses intensely on carbon-footprint reduction measures in its operations. This requires close collaboration with partners, suppliers and customers to minimize the impact of our products on the environment. To help everyone in its supply chain to make climate-smart choices, Atea works with customers and distributors to find efficient solutions to transporting goods. Atea also has



included environmental requirements in its corporate *Code of Conduct* to reduce the indirect carbon emissions caused by suppliers.

To monitor our emissions, a carbon footprint report is produced on a yearly basis, covering all of Atea's operations. It is based on the international standard [Greenhouse Gas Protocol](#). The GHG emission per revenue has decreased by 27% since 2007 while there was a slight increase in GHG emission per full-time employee (FTE). Looking on performance within last two years, the total GHG emission remained on same level despite the fact there was over 50% increase in electricity consumption in data centers mainly caused by development of server park in Atea Norway. Market-based emission has increased by 6% since 2017. However, Atea Group has purchased Guarantees of Origin (GoO) for 14 738 MWh of electricity consumed in 2017. This is 21% more

GoO purchased than in 2016. The electricity purchased with GoO is accounted for as zero emission. The rest of electricity is accounted for with Nordic mix residual emission factor. Atea has also received positive feedback on its reporting in this area: achieving good results on the Carbon Disclosure Leaders Index. Atea intends to improve further in this area.

Atea's environmental engagement is embedded in our company's *Code of Conduct*. The environmental goals we set are made for each of the country in which we operate and are renewed on a yearly basis. Online training on environmental issues is provided, and the company's environmental footprint is published on our intranet for all employees. Atea further contributes to reducing our environmental impact by compensating for our carbon footprint. We currently compensate for the remaining emissions from our largest customer event: Atea Bootcamp. This is equivalent to 150 tons of CO₂.

Reduce, reuse, expand

The best way to minimize the environmental impact of computer hardware is by extending the lifespan of components. That's why Atea created GoITloop: one of the largest reuse-and-recycle programs in the Nordic and Baltic regions today.

Conceived by Atea and originally designed for PCs, this recycling management system ensures complete or partial reuse of hardware, thus preventing a lot of materials from heading to landfill sites. Ensuring data security is a key component of this effort. That's why GoITloop's process includes a step in which all data stored on hardware devices is fully and permanently erased before those devices are refurbished. Before each refurbished product enters the market again, Atea ensures the extended lifecycle of the product.

The partners that are buying the refurbished products must adhere to strict conditions and standards on how they can use and resell devices under this program. These are outlined in a user agreement, which is enforced when signed.

Recycling initiatives based on the GoITloop concept are now in effect in all the countries Atea serves. Today, four of every five client or mobile devices collected through GoITloop gain a prolonged life with a new user.

In 2017, GoITloop was nominated for the Environmental Strategy Award in Sweden.



Q&A: GoITLoop in action

Give older IT equipment a new lease on life: GoITLoop makes it possible. It's Atea's modern, **proven solution for recycling and prolonging the use of IT products**. Discover more about how it works and how it benefits everyone.

In this Q&A, Daniel Norlin (Atea) explains how works:

Q Why should people recycle their IT equipment?

There are many great reasons. Most important of all, because it diverts IT equipment from landfills. As products are regularly updated in a workplace, there's a steady need for a solution to the problem of what to do with older equipment. That includes PCs, servers, network equipment, telephones and other hardware. We solve this by collecting the equipment, and ensuring that it's handled in a secure, environmentally-sustainable way.

Q What are the biggest advantages of GoITLoop?

Besides simplicity, GoITLoop gives you a detailed report on the environmental savings made from recycling by using this service. Another benefit is that we document all asset data on file. That's a big help to anyone on the security side, because it means you have instant information about which units have been discontinued. It helps with asset management, too, because it means you can track inventory and follow-up on where recycled units ended up.

Q Which trends can you see in terms of sustainable IT?

One of the clearest trends is the increasing interest in IT-related environmental issues. During the last two to three years, we have seen how these issues have ranked higher on the public policy agenda. During the last six months, we have also seen a surge of interest in questions of this type among our customers, which we appreciate.

Q What tips do you have on how to succeed with sustainable IT?

Here are some of my favorite tips on making sustainability work for everyone.

First, it must be easy to get it right. To be really successful in working with sustainable IT, it must be easier to get it right than to get it wrong. Anyone in a leadership position who works with issues of this type can make a big difference by creating good routines.

Second, have a policy. This is vital. Develop a policy with both short-term and long-term sustainability targets for the company, and also a description of when various types of IT equipment are to be recycled internally or discontinued from the company.

Third, communicate clearly and regularly. Formal or informal cooperation between the organization's IT management, and sustainability and personnel officers, can support the work of disseminating and anchoring the policy among users. Good anchoring of the policy in the company cannot be overvalued.

Q What are you most proud of in terms of accomplishments?

I am most proud of working for a company that has such a strong commitment to sustainability. Atea dares to lead in this industry. We are the first value-added reseller in the RBA. Others are following our example. That's gratifying.

This is where computers and smartphones are given a second life.

Worldwide, hundreds of millions of computers, tablets and mobile phones are bought every year. More people want to help improve our environment and also boost their IT budgets by recycling and selling used IT products. We visited Atea Logistics, the biggest provider of configuration and recycling services in the Nordic region.

goit loop[®]



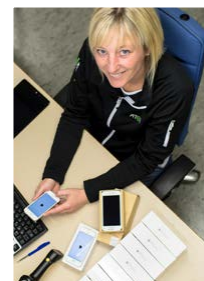
1 **GoTloop is how Atea** addresses the challenge of managing end-of-life IT products. There are various services here – known as loops – for recycling and sales. It all starts with an order at an Atea eSHOP.

2 **Your safe arrives and is filled**
Delivered to your office, this safe is where you put end-of-life equipment. After ten days, it is collected and transported to Atea Logistics in Växjö.



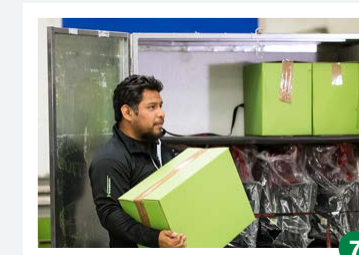
3 **Sorting**
At Atea Logistics in Växjö, tablets, smartphones, monitors, servers and computers are scanned, registered and sorted. Products that work and have a used value are forwarded to the sales group. A price list provides details on what each product is worth and how much will be paid. Unusable products are sent to Atea's subcontractors for crushing and recycling, and later turned into new products.

4 **ID removal**
David Thorell deletes all of the user information from products to be resold.



Hanna Salomonsson configures iPhones so new customers can start using these products right away.

7 **Advantages for everyone**
More and more IT departments are choosing to save time and by having Atea in Växjö configure new IT products when recycling old ones. One of the services involve supplying a safe full of new products which are configured and ready to use. The customer then fills this safe with the older products to be recycled and sold on. The circle is closed.



Edson Rodriguez fills a safe with new computers.

5 **Next**, Kristoffer Lundvall uses dry ice and high-pressure tools to remove ID labels, anti-theft tags and scratches.



6 **Secure transport**
Products to be recycled are transported securely to Atea's subcontractors. They are broken down further here and components are recycled.



Recycling on the rise

The number of people using Atea's GoTloop for recycling and sales has increased steadily for the past five years.

Of the 343,091 devices per year handled by Atea Logistics in Växjö:

- 55 percent are recycled and sold to schools, companies and organizations.
- 45 percent are scrapped and sent to subcontractors for recycling.
- From this scrap, 99.7 percent of the material is recycled and 0.3 percent is sent to landfill.
- 10,000 loops are managed.

The trend is clear: more people today realize the value of recycling. But security is equally important. GoTloop business developer Joachim Aronsson notes:

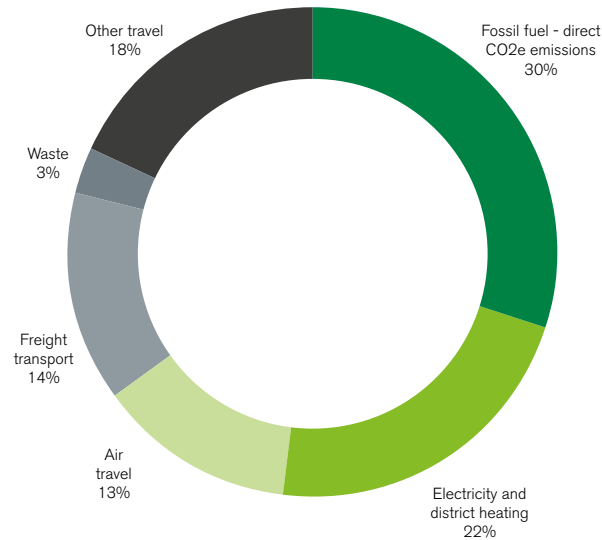
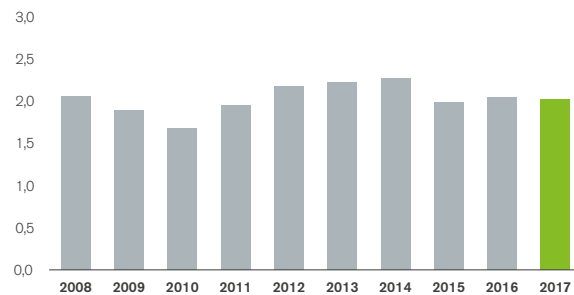
"Information falling into the wrong hands can have devastating consequences. Our customers feel secure in the knowledge that all of their data is deleted securely. We also make sure their hardware is dealt with in an eco-friendly way."

The true value of reused products is regularly underestimated. As Aronsson explains: "Customers often get a nice surprise when they see how much they get back after selling their used products."

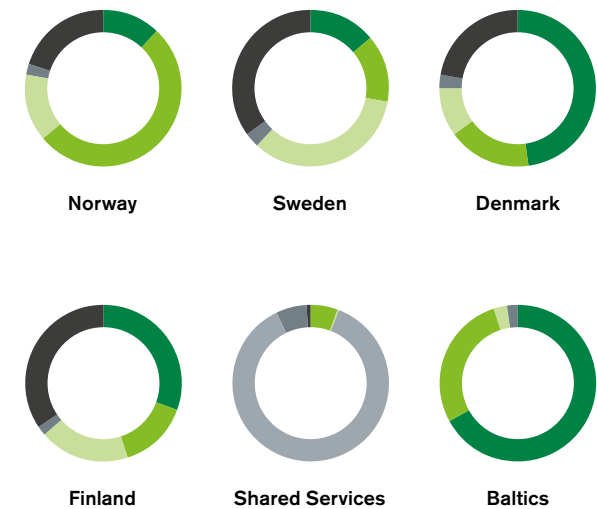
13,162

GHG emissions in tCO₂e

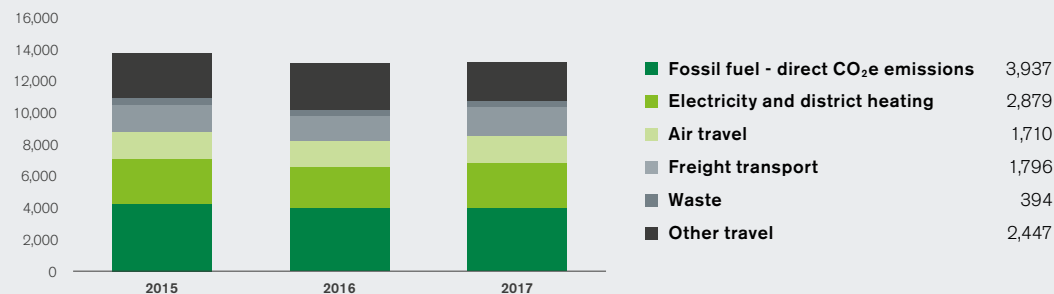
tCO₂e/FTE
2008 – 2017



Group emissions per source



Total annual tCO₂e by source
2007 – 2017



-27%

Reduced CO₂
per revenue
since 2007
(Group level)

-1%

Reduced CO₂
per FTE
since 2016

B

CDP Score

Find more information in our Carbon Footprint Report,
available at atea.com/sustainability



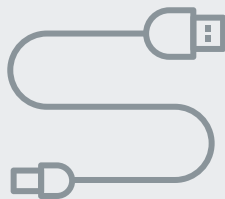
343,091

Units recycled/reused (2017)



521,941 kg

Total weight of units recycled



22,335 kg

Cables recycled



67,336 kg

Weight of screens recycled



ETHICS & GOVERNANCE

Responsible conduct	43
Anti-bribery certification	43
In brief: the Region Zealand Case in Denmark and Atea's response	44
Data privacy	45
Q&A with, Jan Erik Isaksson, CISO	45

Ethics & governance

"The time is always right to do right."

– Nelson Mandela

Ethics and governance are more than just principles and rules. They define the boundaries of what is right, what is acceptable and what is necessary in the actions and judgement of individuals who comprise a business.

They are important to Atea because they are matters of trust. As a company, our success depends on us earning and maintaining the trust of our customers, partners and shareholders. This trust depends on having all employees act in accordance with our company's core values, work methods and ethical guidelines.

Responsible conduct

Promoting ethical conduct is the foundation of our approach to sustainability and corporate responsibility. Having previously revised our *Code of Conduct* in 2015—with all employees having completed compulsory training on this issue—governance routines were further strengthened throughout 2017.

During this period, Atea's compliance officers conducted periodic testing and reviews of the company's internal audits and anti-corruption monitoring systems. This is designed to demonstrate the importance of responsible conduct and management's commitment to compliance in this area.

In 2017, Atea also made it easier for employees to confidentially raise concerns about potential violations by further enhancing its whistleblower hotline. This ensures that all Atea employees have the opportunity to confidentially raise concerns about potential violations of our *Code of Conduct*, of business ethics or of local laws.

Anti-bribery certification

In 2017, Atea's Danish subsidiary was awarded the highest international anti-bribery certification: ISO 37001. We are one of the first companies globally to receive this certification.

To attain this, Atea Denmark completed an extensive audit conducted by Bureau Veritas Certification on its anti-bribery systems. Among the outcomes of this certification, Atea Denmark provides highly detailed disclosures of its business processes, procedures and work culture related to sales it conducts in both the public and private sectors.

The ISPO 37001 certification work was initiated in the wake of a police investigation into potential bribery by former Atea Denmark employees. This case remains before the court. Following the investigation, Atea has also undertaken a self-cleaning process in accordance with EU law. A summary of that process is found on [website](#).



ATEA'S CODE OF CONDUCT IN BRIEF

Our *Code of Conduct* sets the overall tone for how we conduct business. It includes our commitment to uphold the UN Global Compact Principles and to implement these principles throughout our business operation. It also contains our zero tolerance for corruption and bribery. All employees are required to complete the mandatory training related to the *Code of Conduct*, including an exam. All employees must sign an agreement to comply with the *Code* in their everyday work.

In brief: the Region Zealand Case in Denmark and Atea's response

On March 2, 2017, Atea Denmark was presented—as the legally responsible entity—with a formal prosecution (norsk: tiltale) of bribery and embezzlement, carried out by four former employees of the company between 2009 and 2014. These four individuals were employed by Atea Denmark at the time the actions took place. No current employees of Atea are charged or are under prosecution in connection with this case.

Earlier, in the summer of 2014, Morten Felding and Steinar Sønsteby—both newly appointed in their roles as CEO of Atea Denmark and CEO of Atea ASA respectively—were informed that former employees had made decisions, approved expenditures and conducted themselves in an unacceptable manner in conflict with Atea's internal regulations. These actions affected the client Region Zealand, which was notified. That marked the start of a comprehensive police investigation in Denmark. Since then, a number of public officials in Denmark have also been charged as a result of the police investigation into this case.

Danish court proceedings on this case began in October 2017. A verdict from that court is anticipated in May 2018.

Since Atea Denmark has gone through a self-cleaning process in accordance with EU legislation, any prosecution or verdict will not automatically exclude Atea Denmark from competing in public tenders in Denmark. A verdict against Atea Denmark will not have any legal consequences for Atea's business in other countries.

It is noteworthy that since the summer of 2015, Atea has implemented a series of measures:

- In accordance with EU anti-corruption and tendering legislation, Atea Denmark performed a thorough self-cleaning process;
- Atea Denmark undertook and received certification on anti-corruption (ISO 37001 Anti-Bribery Systems);
- The Atea Group established a thorough compliance system, including comprehensive control procedures;

- Atea's *Code of Conduct* has been updated and strengthened and all Atea employees are required to complete a training program in ethics and on understanding its Code;
- Atea's anonymous whistle-blower system has been strengthened for those who wish to report violations of the *Code of Conduct* or of relevant law;
- A compliance committee was established within Atea's Board of Directors;
- Atea's CFO, Robert Giori, was appointed as Group Compliance Officer; and
- All business units report on compliance quarterly to ensure governance systems are working as expected.



Data privacy

A digital society is a more transparent society. Digitalization also poses new threats of data privacy and online abuses. These are challenges that private and public entities need to continue to address. Since the internet is borderless, it's difficult to use a single legal framework to regulate behavior and protect citizens.

That's why companies need to take a principled stand on data privacy.

At Atea, we value the privacy of our customers. Our privacy specialists are devoted to supporting and maintaining that value in our internal procedures. Atea monitors regularly both our own infrastructure and internet activity for possible breaches. We also conduct employee-security education to improve awareness and to minimize incidents.

In 2017, Atea did not receive complaints from outside partners or from regulatory bodies concerning breaches of customer data. There were no identified leaks of customer data or privacy data during the review period.

We work in compliance with the national laws of the countries in which we operate, as well as with the [EU Directive 95/46/EC](#), and we are currently in the process of adapting our operations in accordance with [Regulation \(EU\) 2016/679](#), (formerly General Data Protection Regulation, GDPR).

By Q1 2018, Atea will be completely GDPR ready. That means we will have in place governance, processes, security shields, and control of personal information in our systems and services.

Q&A with, Jan Erik Isaksson, CISO

Q Why do both your management and stakeholders prioritize the compliance with the EU's new General Data Protection Regulation?

We want to be a responsible actor. And we always strive to follow laws and jurisdictions. We do this because we value the privacy of our customers. By March 2018, Atea will be GDPR ready. That means we will have in place governance, processes, security shields, control of personal information in our systems and services.

Q What is your key to success?
Knowledge and passion. We have a passion for IT and information security. And we aim to be early adopters of new technology and regulations.

Q What will happen next?
The GDPR project will during March 2018 be moved from project to governance and be internally audited to control and fine-tune processes and organization.

Ensuring compliance

Employee compliance is an important component of Atea's *Code of Conduct*. Atea accomplishes this through its established compliance organization.

Created in 2015, it reports directly to the Board of Directors. Group and local Compliance Officers have been appointed across the company. These in turn report directly to the Board's compliance committee and to the Board itself.

Reports and surveys on compliance issues are conducted on a quarterly basis, or more frequently if circumstances require. All employees, including Compliance Officers, must participate in training, demonstrate knowledge of the Code and sign a document indicating they will abide by it. The compliance organization routinely follows-up on matters pertaining to the *Code of Conduct*. This serves to promote ethical behavior, internal control and corporate social responsibility.















INDEX







GRI Content Index	48
Management Approach of Disclosures	52
Communication on Progress	57
Key Figures Group (2013-2017)	58

GRI Content Index

GRI 102: GRI Topic-specific disclosures	Name of disclosure	SDGs	Page in this report	Atea Policies and Guidelines	Omissions/Comments
Organizational profile					
GRI 102-1	Name of the organization		1, 7		
GRI 102-2	Primary brands, products and/or services		7		
GRI 102-3	Location of organization's headquarters		7		
GRI 102-4	Country where the organization operates		7		
GRI 102-5	Nature of ownership and legal form		7		
GRI 102-6	Markets served		7		
GRI 102-7	Scale of the organization		7, 19		
GRI 102-8	Total workforce		19		
GRI 102-9	Organization's supply chain description		28		
GRI 102-10	Significant changes to the organization and its supply chain				No significant changes during 2017
GRI 102-11	Precautionary Principle or approach		AR , page 39-41		
GRI-102-12	List external initiatives		4, 9	<i>Code of Conduct</i>	
GRI 102-13	List membership of associations		9		
Strategy					
GRI 102-14	Statement from senior decision-maker		4		
Ethics & Integrity					
GRI 102-16	Values, principles, standards and norms of behavior		18, 43		
Governance					
GRI 102-18	Governance structure		AR , page 94		

GRI 102: GRI Topic-specific disclosures	Name of disclosure	SDGs	Page in this report	Atea Policies and Guidelines	Omissions/Comments
Stakeholder engagement					
GRI 102-40	List of stakeholder groups		9		
GRI 102-41	Collective bargain agreement		11		Approximately 90 percent of our employees are covered by collective bargaining agreements and/or universally binding collective agreements
GRI 102-42	Identifying and selecting stakeholders		9		
GRI 102-43	Approach to stakeholder engagement		9		
GRI 102-44	Key topics and concerns raised		9		
Reporting practice					
GRI 102-45	Entities included in the consolidated financial statements		58, AR , page 54		
GRI 102-46	Defining report content and topic Boundaries		9		
GRI 102-47	List of material topics		11		
GRI 102-48	Restatements of information				No restatements
GRI 102-49	Changes in reporting		11		We calibrated our materiality assessment based on the stakeholder survey. We added two new materiality topics during 2016: Diversity and equal opportunity for Atea's employees as well as reduction of greenhouse gas emissions within Atea's own operations
GRI 102-50	Reporting period		2		Calendar year
GRI 102-51	Date of most recent report		2		15.03.2017
GRI 102-52	Reporting cycle		2		Annual
GRI 102-53	Contact point for questions regarding the report				Andreas Rydell, Group Sustainability Officer andreas.rydell@atea.com
GRI 102-54	Claims of reporting in accordance of GRI Standards		2		This report has been prepared in accordance with the GRI Standards: Core option
GRI 102-55	GRI Content Index		48		

GRI 102: GRI Topic-specific disclosures	Name of disclosure	SDGs	Page in this report	Atea Policies and Guidelines	Omissions/Comments
Ethics & Governance					
GRI 205: Anti-Corruption 2017					
GRI 103: Management Approach			56		
GRI 205-1	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified		43	<i>Code of Conduct</i>	
GRI 205-2	Communication and training on anti-corruption policies and procedures		43	<i>Code of Conduct</i>	
GRI 205-3	Confirmed incidents of corruption and actions taken		43	<i>Code of Conduct</i>	
GRI 418: Customer privacy 2017					
GRI 103: Management approach			56		
GRI 418-1	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data		45		
Environment					
GRI 305: Emissions 2017					
GRI 103: Management approach			55		
GRI 305-1	Direct greenhouse gas (GHG) emissions (scope 1)	 	40	Carbon Footprint Report	For more information, see our Carbon Footprint Report
GRI 305-2	Energy indirect greenhouse gas (GHG) emissions (scope 2)	 	40	Carbon Footprint Report	For more information, see our Carbon Footprint Report
GRI 305-3	Other indirect greenhouse gas (GHG) emissions (scope 3)	 	40	Carbon Footprint Report	For more information, see our Carbon Footprint Report
GRI 305-5	Reduction of greenhouse gas (GHG) emissions	 	40	Carbon Footprint Report	For more information, see our Carbon Footprint Report

GRI 102: GRI Topic-specific disclosures	Name of disclosure	SDGs	Page in this report	Atea Policies and Guidelines	Omissions/Comments
People					
GRI 403: Occupational Health & Safety					
GRI 103: Management approach			52		
GRI 403-2	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities, by region and by gender		18, 19		
GRI 405: Diversity & Equal opportunity 2017					
GRI 103: Management Approach			52		
GRI 405-1	Composition of governance bodies and breakdown of employees per employee category according to gender, age group and other indicators of diversity		19	Supplier Code of Conduct Diversity policy	
Responsible sourcing					
GRI 308: Supplier environmental assessment 2017					
GRI 103: Management approach			54		
GRI 308-1	Percentage of new suppliers that were screened using environmental criteria		31	Supplier Code of Conduct	
GRI 308-2	Significant actual and potential negative environmental impacts in the supply chain and actions taken		31	Supplier Code of Conduct	
GRI 408: Child Labor 2017					
GRI 103: Management approach			54		
GRI 408-1	Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor		31	Supplier Code of Conduct	
GRI 409: Forced or compulsory labor 2017					
GRI 103: Management approach			54		
GRI 409-1	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor		31	Supplier Code of Conduct	
GRI 414: Supplier social assessment 2016					
GRI 103: Management approach			54		
GRI 414-1	Report the percentage of new suppliers that were screened using criteria for impacts on society	 	31	Supplier Code of Conduct	
GRI 414-2	Significant actual and potential negative impacts on society in the supply chain and actions taken	 	31	Supplier Code of Conduct	

Management Approach of Disclosures

People

Why are they material?

Explanation of the material topic and its boundary

At Atea, we are aware that our company's long-term success is dependent on recruiting skilled IT professionals, and providing our employees with a work environment in which they can develop and contribute their talents. This work environment and culture is central to Atea's vision of being "The Place to Be" where we value gender equality, skills development as well as health and safety. By investing in our employees, we can contribute to their well-being, which in turn increases the overall performance of the company.

How are they managed?

The management approach and its components

The HR Manager in each country is responsible for the people function at Atea. The Atea's Compliance Committee and the whistle-blower function acts as the grievance mechanism for Atea's employees.

Diversity & Inclusivity

Atea prevents discrimination as prescribed in the Anti-Discrimination Act and it is our policy not to discriminate against any employee because of age, race, religion, color, sex, disability, national origin or sexual orientation. We follow the Norwegian law to have at least 40 percent of women in the Board of the company. We also encourage more women to work in the IT industry by arranging activities to promote gender balance. We invest in integration projects by matching people that have attained asylum in the job market. The goals for 2017 regarding diversity & inclusion is to increase the amount of female employees as well as contribute to a more diverse workforce.

Professional Development

Atea has a strong learning culture and our employees are offered training in management and IT infrastructure topics, on a regular basis. An introduction program has been implemented in every country to quickly integrate new employees. All employees are required to successfully complete an examination on Atea's *Code of Conduct*, and sign a confirmation that they will comply with the Code.

Health & Safety

Our approach of managing the health and safety issues is to make sure that the working conditions meet or exceed the legal requirements of the countries in which we operate and the conventions of the UN Global Compact and ILO. Hazards are identified and monitored to prevent accidents and occupational illness, and guidelines for the workplace are monitored to ensure a healthy and safe environment.

How are they monitored?

Evaluation of the management approach

- We follow up absence due to illness as well as risk of occupational injury on a yearly basis.
- Employee surveys, and goal and development interviews with employees, are held regularly in each country.
- We follow up people data relating to diversity and inclusivity regularly.

Results 2017

- In 2017, we started several integration & inclusivity projects in all countries in order to increase the diversity at the Group. More information can be attained in our Sustainability Report.
- Activities related to the professional development of our employees that have taken place during 2017 are:
 - 100 percent of our employees have successfully completed an examination on Atea's *Code of Conduct*, and have signed a confirmation that they will comply with the *Code*.
 - In 2017, there were no occupational injuries resulting in absence.

Management Approach of Disclosures

	Why are they material?	How are they managed?	How are they monitored?	Results 2017
	Explanation of the material topic and its boundary	The management approach and its components	Evaluation of the management approach	
Society	<p>Digitalization At Atea, we aim to build the future with IT. By pursuing this mission, we believe that Atea can make a positive contribution to society, as information technology improves productivity and living standards across society. We have seen a rapid expansion of "Internet of Things" (IoT) solutions where technology solutions could increase public safety, enhance resource management, and sustain the environment.</p> <p>However, there is still a large portion of the world's population that lives in poverty without access to technology. At Atea, we believe that the access to technology can help both people and societies to reach their potential. Atea's response is to do what we do best: create innovative digital solutions in for example the health care sector or providing schools with digital tools. Both positive environmental and social impacts is thus possible through our offer.</p>	<p>Digitalization We have regular dialogues with our strategic partners in order to gain insights of new digital trends and solutions. In addition, we conduct benchmarks and we have the recruited IT specialists within the area. The country CEO is responsible for Atea's work within digitalization. In 2017, our goal is to develop new projects and start collaborations within the digital arena.</p>	<p>Digitalization Every product and services area follow up their digital collaborations and projects.</p>	<p>Digitalization</p> <ul style="list-style-type: none"> • In 2017, we collaborated in several interesting digitalization projects. More information can be attained in the sustainability report and/or national websites.
	<p>Charity engagements Atea recognizes that we live in a global world where everything is interconnected. Hence, the company supports several organizations and also carries out its own projects to collect donations.</p>	<p>Charity engagements Every country is responsible for their own charity projects. The goal for 2017 is to both implement an overall sustainability strategy and policy for the group as well as connect the charity engagement with our engagement with the SDGs.</p>	<p>Charity engagements We follow up our societal efforts on an annually basis where every country needs to report on what they have done during the year.</p>	<p>Charity engagements</p> <ul style="list-style-type: none"> • More information can be attained in the sustainability report and/or national websites. • In 2016, Atea Sweden was ranked as one of the leading companies working with children's rights by the Global Child Forum in the report "The Corporate Sector and Children's Right in the Nordic Region" in which 300 companies were assessed.

Management Approach of Disclosures

Why are they material?

Explanation of the material topic and its boundary

How are they managed?

The management approach and its components

How are they monitored?

Evaluation of the management approach

Results 2017

Responsible sourcing

Responsible Sourcing

Our suppliers operate in some of the highest risk countries in the world, we therefore work to continuously improve conditions in these locations. Our supply chain is complex and involves many steps. It is a challenge to have full control of working conditions, including excessive working hours, violations of freely-chosen employment, the existence of child labor, environmental pollution and business ethics. Nevertheless, we remain committed to being at the forefront of ethical and sustainable production.

Responsible sourcing of minerals remains one of the key challenges for the electronics and other industries – as increasing global demand, coupled with poor governance, poverty and sometimes outright conflict in the regions where minerals are extracted, exacerbate the potential for human rights abuses. Due diligence on conflict minerals is an integral part of Atea supply chain sustainability program, although we recognize the challenges involved in assessing how impacts are handled several layers into the supply chain. In line with the OECD guidelines for responsible mining from conflict affected areas, we have identified the Original Equipment manufacturers – our suppliers – as the key point in our supply chain where we should focus our traceability and due diligence activities.

Responsible Sourcing

Our strategy is embedded in Atea's *Code of Conduct*, which sets out that our suppliers shall deliver goods manufactured in accordance with the RBA *Code of Conduct* – the industry standard supported by more than 110 member companies and over 6,000 suppliers. We have adopted the RBA code as our *Supplier Code of Conduct*. All new suppliers and existing suppliers of commercial relevance are assessed on their compliance with and adherence to the Code. When joining the RBA, we also joined the Conflict Free Sourcing Initiative – which is dedicated to auditing and certifying smelters that work with conflict minerals, to strengthen our due diligence and keep abreast progress upstream in our supply chain.

Responsible Sourcing

We assess our partners against their commitment to upholding the RBA Code in their own operations and supply chain; against the maturity of their management system; and against the level of transparency reached in documenting their efforts. We leverage the tools and processes developed by RBA, of which Atea became a member in May 2016, to facilitate the assessment.

Where specific risks are found, suppliers are followed-up through dialogue and documentation gathering. This may involve an assessment of relevant sub-suppliers' documentation of sub-suppliers as well as site-visits and audits.

A corrective action plan is formulated depending on the severity of eventual issues found. If risk reduction measures were to be found inadequate, or if major breaches against social and ethical demands occur and are not addressed within agreed timeframes, the business relation could be terminated completely.

Responsible Sourcing

- In May 2016, we became a member of the Electronic Industry Citizenship Coalition (RBA).
- During 2017, we exceeded our target of assessing 90 percent of spend, which also exceeds the RBA membership compliance requirements.
- In 2017, we instigated follow-ups of four suppliers where Atea had identified room for improvement in terms of transparency and willingness to engage. Three out of the four follow-ups conducted during the year resulted in the suppliers reaching Atea's minimum standards and follow-up is still ongoing for the remaining supplier.
- The RBA merged the two initiatives—CFSI (Conflict-Free Sourcing Initiative) and RRMI (Responsible Raw Materials Initiative)—to create the Responsible Minerals Initiative (RMI). As a founding member of this initiative, Atea assisted in shaping the direction of the RMI.

Management Approach of Disclosures

Environment

Why are they material?

Explanation of the material topic and its boundary

Environment

Atea recognizes the impact our operations have on the environment and we are determined to take the necessary actions to reduce our impact. This impact occurs at every stage of our product's lifecycle and not only inside our business. Therefore, Atea is increasingly cooperating with our suppliers, partners and customers on how to minimize the damage caused by our products, and also to inspire them to make responsible and climate-smart choices.

How are they managed?

The management approach and its components

Environment

Our environmental engagement is embedded in Atea's *Code of Conduct*, and environmental goals are created on a geographical basis for each country on a yearly basis. All countries are ISO14001-approved, which requires mandatory training for all Atea's employees on these matters. The environmental manager in each country has the overall responsibility for the environmental function at Atea.

Since a big part of our CO₂ footprint derives from logistics, we have a close dialogue with the distribution companies with which we collaborate regarding more efficient and more environmentally friendly alternatives for transport. In addition, our ambition is to reduce our CO₂ emissions by 50 percent by 2020, which is one of the toughest climate targets in the industry. For Atea, it is important to be a leading example for other companies. We currently compensate for the remaining emissions from our largest customer event Atea Bootcamp, which is equivalent to 144 tons of CO₂. Atea also carbon offsets for the Swedish customer magazine, *Tomorrow*.

In 2017, we joined the Science based targets initiative and will set our target in 2018.

How are they monitored?

Evaluation of the management approach

Environment

We review and follow up our emissions regularly in order to be on track. In order to monitor our emissions, a carbon footprint report is produced on a yearly basis, covering all of Atea's operations. The report is based on the international standard Greenhouse Gas Protocol (GGP). Atea has also received acknowledgement for good results on the Carbon Disclosure Leaders Index (CDP): a position Atea will strive to improve further.

Results 2017

Environment

- We have achieved a reduction of 27 percent CO₂ on a Group level since 2007.
- During 2017, we have carbon compensated for 150 ton CO₂.
- Achieved CDP Score B during 2017.

Recycling

In addition, there are several social and environmental risks present in the downstream value chain for electronic products. Today, far too many devices from the ICT-industry end up in heavily polluted waste dumpsites in developing countries. Atea believe that the best way for us to minimize the environmental impact of our IT equipment is by extending their lifespan through complete or partial reuse, or by ensuring further use.

Recycling

Our GoITloop concept promotes relocation, reuse and recycling of electronic products in a responsible manner. GoITloop is now the leading recycling concept for IT equipment in the Nordic and Baltic region, with a capacity of approximately 377,922 units per year. All our activities are ISO 14001-approved. Atea Logistics has the responsibility of the recycling function at Atea.

Recycling

Atea receives regular statistics of amount of recycled units in GoITloop, and is thus able to monitor and follow-up as well as constantly improve the process.

Recycling

- During 2017, Atea's concept GoITloop recycled 343,091 units.
- Atea's in-house initiative—Game of Phones—was nominated as the best environmental initiative of the year.

Management Approach of Disclosures

Ethics & governance

Why are they material?

Explanation of the material topic and its boundary

Anti-Corruption & Bribery

Atea takes an absolute zero-tolerance approach to bribery and corruption and we are committed to conducting our business in an honest and ethical manner. This message is enforced by the Board of Directors, CEO and Group Executive Management. The success of our company depends on the trust of its customers and stakeholders. This trust in turn depends on its employees acting in accordance with the company's core values, work methods and ethical guidelines. A strong code of ethical and professional conduct must be the foundation upon which Atea is built.

Data privacy

At Atea, we also value the privacy of our customers and our privacy specialists are devoted to maintaining our internal procedures and processes to protect the privacy of the people who use our products. As a responsible IT company, we are aware that we have a direct impact on our customer's privacy and we have therefore developed a robust program that will be further improved in 2018.

How are they managed?

The management approach and its components

Anti-Corruption & Bribery

We have updated our *Code of Conduct* and focused on internal communication and training of the employees on these issues. We have among other things sharpened our control routines regarding expenses and customer events to ensure that they are in compliance with the law and with good business practice.

Atea has an anti-bribery and corruption program. Back in 2015, it became mandatory for all employed staff to conduct the training in anti-corruption when joining Atea. The responsibility for the anti-corruption function is the Group Sustainability Officer of the group. In 2017 Atea's Danish subsidiary was awarded the highest international anti-bribery certification: ISO 37001. We aim at ensuring ISO 37-compliance in 2018 in other countries within the group, including key elements from U.S. Sentencing Guidelines and the UK *Bribery Act Adequate Procedures*.

Data privacy

We work in compliance with national laws of the countries in which we operate, as well as with the EU Directive 95/46/EC. We are currently also in the process of adapting our operations in accordance to the new EU General Data Protection Regulation, which will come into effect during the spring of 2018. In 2017 Atea has been running a global project to be GDPR ready which includes enhanced logging and follow-up on personal data including customer data which will enhance the security. Further goals for 2017 is to carry out data security training for Atea's employees. The responsibility for the data security program is the chief information security officer at the Atea Group.

How are they monitored?

Evaluation of the management approach

Anti-Corruption & Bribery

All employees are required to complete a training related to the *Code of Conduct* which is finalized with an exam. Furthermore, all employees must sign an agreement to comply with the *Code* in their every day work.

The compliance organization was established during 2015, which reports directly to the Board of Directors. Both Group and Local Compliance Officers have been appointed across the company. These in turn report directly to the Board's compliance committee, and into the Board itself. Reports and surveys on compliance issues are conducted throughout the organization quarterly, or more frequently if circumstances requires. The compliance organization routinely follows-up on matters pertaining to the *Code of Conduct*, and its effectiveness in promoting ethical behavior, internal control, and corporate social responsibility. In addition, internal as well as external audits are carried out in each country.

Data privacy

Atea monitors both our own infrastructure and the internet regularly for possible breaches and works organized with employee security education to improve awareness and to minimize incidents.

Results 2017

Anti-Corruption & Bribery

- Atea has during 2017 begun to implement an anti-bribery and corruption (ABC) program.
- SO 37001 certification (anti-bribery) for Atea Denmark
- 100 percent of our employees have successfully completed an examination on Atea's Code of Conduct, and have signed a confirmation that they will comply with the *Code*.

Data privacy

- There has been zero identified leaks of customer data or privacy data during 2017.
- During 2017, Atea launched a pilot training program in data security in Sweden and Norway and Atea is looking into the opportunity to implement this training in all countries.
- Atea will be GDPR ready by April 2018.

Communication on Progress

This 2017 Corporate Sustainability Report, signed by our CEO—together with the information about sustainability found on Atea's webpages—serves as our **Communication on Progress**. Our self-assessment work to that end has been submitted on the UN Global Compact website.

Area	Principle	In this report	Atea Policies & Guidelines
Human Rights	1. Businesses should support and respect the protection of internationally proclaimed human rights.	Page 9, 10, 23	• <i>Code of Conduct</i>
	2. Businesses should make sure that they are not complicit in human rights abuses.	Page 23, 24	
Labor Rights	3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Page 14	• <i>Code of Conduct</i> • Supplier due diligence
	4. Businesses should uphold the elimination of all forms of forced and compulsory labor.	Page 23	
	5. Businesses should uphold the effective abolition of child labor.	Page 23	
	6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Page 15	
Environment	7. Businesses should support a precautionary approach to environmental challenges.	Page 36	• <i>Code of Conduct</i> • Environmental policies
	8. Businesses should undertake initiatives to promote greater environmental responsibility.	Page 36, 39, 40	
	9. Businesses should encourage the development and diffusion of environmentally friendly technologies.	Page 39, 40	
Anti-corruption	10. Businesses should work against corruption in all forms, including extortion and bribery .	Page 18, 19, 20	• <i>Code of Conduct</i> • Governance documents for the companies in the Atea Group (including Ethical Guidelines)

Atea supports the UN Global Compact and its 10 principles in the areas of human rights, labor rights, environment and anti-corruption. We operationalize the principles through guidelines, policies, reporting and internal/external trainings and seminars.

Key Figures Group (2013-2017)

Atea's objective is to provide a competitive long-term return for shareholders, relative to the underlying risk of the company's operations.

NOK in million (unless stated otherwise)	2013	2014	2015	2016	2017
Revenue	22,096	24,588	27,904	31,188	32,438
Gross Profit	5,320	5,717	6,403	6,939	7,218
Gross margin (%)	24.1	23.3	22.9	22.2	22.3
Operating profit (EBIT)	355	584	514	677	799
EBIT-margin (%)	1.6	2.4	1.8	2.2	2.5
Earnings per share (NOK)	3.33	4.14	3.76	4.87	5.10
Diluted earnings per share (NOK)	3.31	4.10	3.71	4.80	5.00
Dividend per share (NOK)	9.50	6.00	6.50	6.50	6.50
Net financial position	-419	-829	-750	-350	102
Cash flow from operations	874	959	1,287	1,404	1,238
Liquidity reserve	1,326	1,628	1,573	2,362	3,040
Equity ratio (%)	31.6	28.1	25.3	23.8	22.6
Number of full-time employees at the year end	6,280	6,504	6,779	6,882	6,904

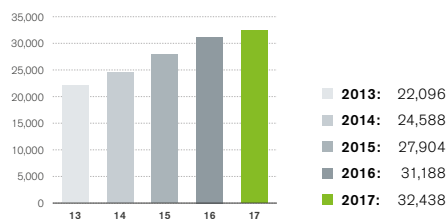


Robert Giori
CFO of Atea ASA

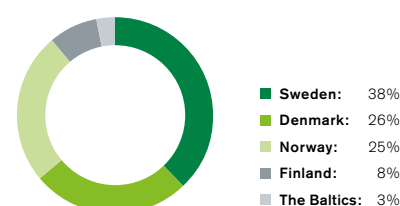
Robert Giori joined Atea as Chief Financial Officer in 2014. He has extensive experience in financial management for public companies within the IT industry. Prior to joining Atea, Robert spent over five years as Chief Financial Officer of Nordic Semiconductor ASA. He has also worked as Chief Financial Officer of TeleComputing ASA and as Finance Director for Dell's operations in Norway. In addition, he has previously been a consultant with McKinsey & Company.

Robert Giori has an MBA from Harvard University and a Bachelor degree from Stanford University. He has completed the Certified Public Accountant (CPA), Certified Management Accountant (CMA) and Chartered Financial Analyst (CFA) examinations in the United States.

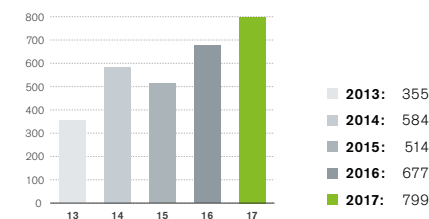
Revenue
2013 – 2017 (NOK in million)



Revenue per country
2017



EBIT
2013 – 2017 (NOK in million)



TP2B

THE PLACE TO BE

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Holding

Atea ASA

Atea ASA
Brynsalleen 2
Box 6472 Etterstad
NO-0605 Oslo
+47 22 09 50 00
Org.no 920 237 126
investor@atea.com
atea.com

Finland

Atea Oy

Jaakonkatu 2
PL 39
FI-01621 Vantaa
+ 358 (0)10 613 611
Org.no 091 9156-0
customer@atea.fi
atea.fi

Norway

Atea AS

Brynsalleen 2
Box 6472 Etterstad
NO-0605 Oslo
+47 22 09 50 00
Org.no 976 239 997
info@atea.no
atea.no

Lithuania

Atea Baltic UAB

J. Rutkauskas st. 6
LT-05132 Vilnius
+370 5 239 7899
Org.no 300125003
info@atea.lt
atea.lt

Sweden

Atea AB

Kronborgsgränd 1
Box 18
SE-164 93 Kista
+46 (0)8 477 47 00
Org.no 556448-0282
info@atea.se
atea.se

Group Logistics

Atea Logistics AB

Smedjegatan 12
Box 159
SE-351 04 Växjö
+46 (0)470 77 16 00
Org.no 556354-4690
customer.care@atea.se

Denmark

Atea A/S

Lautrupvang 6
DK-2750 Ballerup
+45 70 25 25 50
Org.no 25511484
info@atea.dk
atea.dk

Group Shared Services

Atea Global Services SIA

Mukusalas Street 15
LV-1004 Riga
+371 67359600
Org.no 50203101431
rigainfo@atea.com
ateaglobal.com

ATEA