



Corporate Sustainability & Responsibility Report 2016



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7%  *reduction of CO₂ since 2015*

377,922
Units recycled

ALL

employees completed training in our Code of Conduct



Recognized as "Industry Leader" by Global Child Forum

This Corporate Sustainability and Responsibility report identifies the sustainability and responsible business-development initiatives and strategies that Atea engaged during 2016. It showcases how we approach this work: to look at the complete value chain, to manage social, ethical and environmental risks, and to work on having a positive impact on the societies in which we operate. The report covers the whole Atea Group. Our last Sustainability Report was published in March 2016. All data and activities reported in this report occurred between January 1, 2016, and December 31, 2016, unless stated otherwise.



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

INTRODUCTION

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Letter from the CEO

For many—including Atea—2016 was a year of transition. In the realm of technology, this is a period of considerable change. We are moving toward digitalized future: one that offers immense promise. Atea is well positioned with resources and knowledge to make the most of this shift.

Not only do our solutions address IT-related problems in an innovative way, we also are able to tackle profoundly human challenges. In 2016, countries that Atea serves in the Nordic and Baltic regions were coping with the aftermath of an international refugee crisis. Digitalization was there to help people in their time of need. As a way of contributing, Atea Denmark created a program that provided PCs preloaded with software to 650 asylum-seeking children so they could stay in contact with their loved ones.

Atea believes strongly that creating a sustainable future is not at odds with growing a successful company. They complement each other. That is why we have embraced a series of measures that support this belief. We appointed our first Group Sustainability Officer, Andreas Rydell in 2016. He is developing a rigorous sustainability program that we have committed to follow for years to come. On the environmental front, we are very proud to have been awarded a 2016 “Green Role Model,” and were ranked as one of the leading companies working with children’s rights by the Global Child Forum.

We also strive to ensure a solid foundation for ethics and governance. Widely reported events that took place in Denmark in 2015 prompted us to look carefully at our internal processes and develop a mandatory program for all employees in support of a revised *Code of Conduct*. One of our aims for 2017-2018 is to obtain an ISO 37001 certification, which is a new anti-bribery management systems standard.

Last but not least, Atea believes in having a responsible supply chain for components that go into our IT products and solutions. We have become a vocal member of the Electronic Industry Citizenship Coalition (EICC) – the world’s first value added reseller to do so. And we have taken a hands-on approach to how we manage responsible sourcing, including on-site visits and developing a compliance process.

We are signatories of the UN Global Compact since 2010 and our sustainability work is guided by its ten key principles. We are committing ourselves to continuing this important work and to focus even more on the establishment of responsible management practices throughout our group, as well as to incorporate this work in everything we do.

“We do all of this because we believe strongly that what is good for society is good for business.”



Steinar Sønsteby
CEO, Atea ASA

Steinar Sønsteby joined Atea in 1997, and was Managing Director of Atea Norway from 2006 to 2012. He was appointed Executive Senior Vice President of Atea ASA from 2012 to 2014, and was promoted to CEO of Atea ASA in February 2014. 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.

Why this matters: An interview with Atea's Group Sustainability Officer

As part of Atea's ongoing work to promote and accelerate sustainability efforts, the company appointed its first Group Sustainability Officer, Andreas Rydell. The following Q&A session with Rydell highlights how he carries out his work, leading Atea's ongoing efforts related to responsible business.



Andreas Rydell
Group Sustainability Officer

Andreas joined Atea Sweden AB in 2012 as Head of Quality and Environment. He is also 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.

Q What brought you into this new role at Atea?
Previously, I was the Director of Quality & Environment at Atea Sweden. In July 2016, I took on this new role as Group Sustainability Officer. It's a responsibility I take very seriously, because this position builds on the work I have done in previous years to ensure that Atea's sustainability efforts are coordinated and harmonized in every country where we operate today.

involve tackling important changes that are already underway, including digitalization and how it applies to the growth of big data and the proliferation of the Internet of Things.

Q Can you describe a bit more how you work with the UN's Sustainable Development Goals (SDGs)?
There are 17 goals and 169 targets, set by the UN and its member states to achieve over the next 15 years. Atea embraced these in January 2016, in effect saying that we will do our part to focus on meeting those goals in the years ahead. This is a gigantic challenge. It will require collaboration with a wide range of sectors to achieve goals by 2030. The digital world is crucial for a sustainable environmental and social development. Within the IT sector, this is going to

Q Where are your biggest challenges regarding sustainability and corporate responsibility?
Keeping up with the steady pace of change. Our new membership on the EICC means that we are highly visible, as well as vocal. So we have to stay on top of all issues stemming from responsible sourcing. This means continual learning about manufacturing of IT products, and seeking opportunities to cooperate with suppliers to address the most pressing issues, such as forced labor and conflict minerals.

Another challenge is that a digital society is also a more transparent society. So new threats to data privacy online are important topics—for both private and public entities. Trust is everything at Atea, so ethics and good governance are also crucial. Internally we've revised our *Code of Conduct*. We've also begun to implement an anti-bribery and corruption program, which will be further developed in 2017.

Q What would you say is your biggest success in 2016?
We were of course happy and humble that we were awarded the 2016 "Green Role Model" and that we were 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." We don't do this work to get awards, but at the same time it is a recognition that we are on the right track.

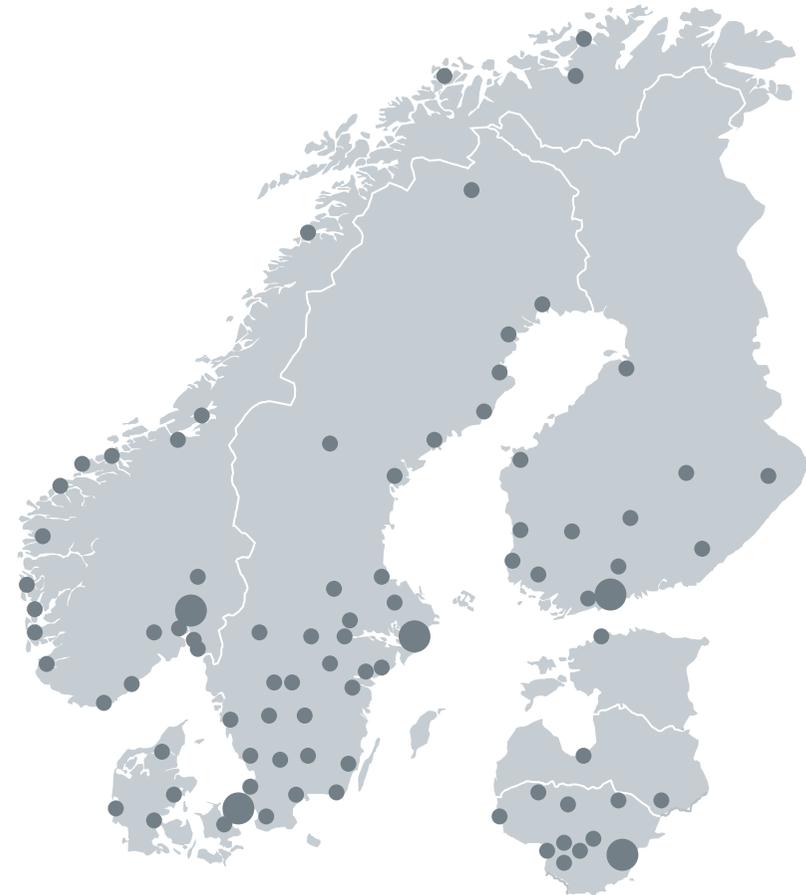
Q What are your hopes for sustainability 2017?
We believe in partnerships and on-going dialogue with our stakeholders to improve the conditions within our supply chain and we will continue to prioritize these issues as we move ahead. We aim at strengthening our position of being the forerunner of responsibility and sustainability in the IT-sector.

About Atea

Atea is the **market leader in IT infrastructure and system integration** for businesses and public sector organizations in the Nordic and Baltic regions.

With nearly 6,900 employees and some 4,000 consultants located in 86 cities across seven countries—Norway, Sweden, Denmark, Finland, Lithuania, Latvia and Estonia—Atea offers a full range of hardware and software from the world's top technology companies.

In 2016, Atea had revenue of NOK 31.2 billion. We are listed on the Oslo Stock Exchange (ticker: ATEA) and submit all reports as required under the Norwegian Accounting Act.





About The Report

Atea reports according to **GRI Standards** and the criteria as set by **UN Global Compact**. In addition to this, we have also integrated the SDGs in this report.

In this report, we aim to inform our stakeholders of the initiatives and strategies related to sustainability and responsible business development that we are focusing on at Atea. Our approach is to take the perspective of the whole value chain and to manage social, ethical and environmental risks as well as contributing to positive impacts both in our business and in the societies in which we operate. We strongly believe that what is good for society is good for business.

Doing more for a sustainable future

Since 2010, Atea has also been a reporting member of the UN's Global Compact Initiative. As such, we support 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* with the exception that we added an extra provision regarding conflict minerals.



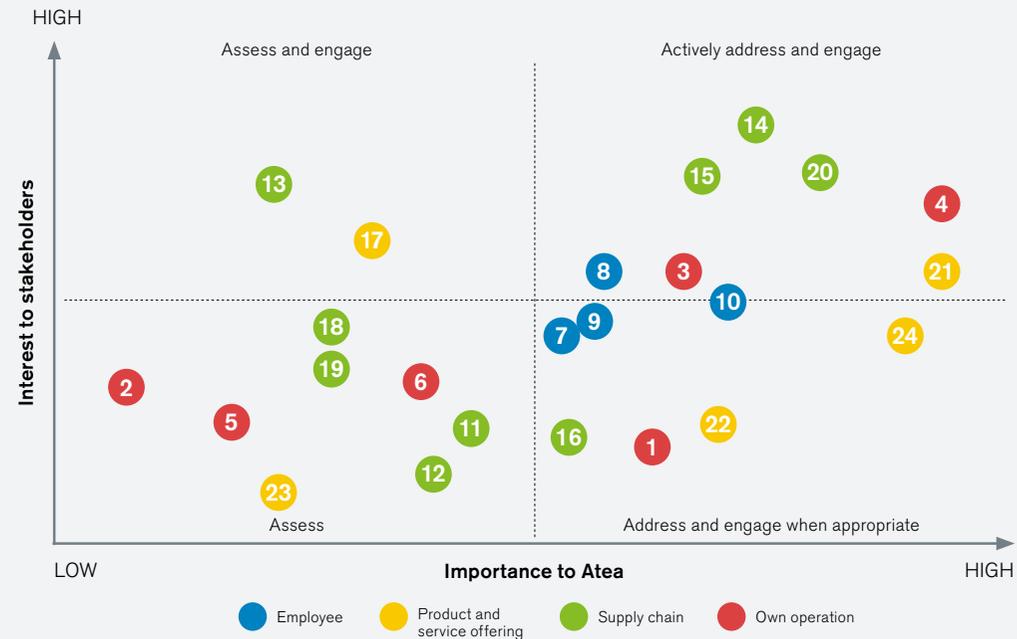
Stakeholder Dialogue

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

Engaging with stakeholders (i.e., employees, investors, partners, customers, suppliers and public institutions) is an inclusive, continuous process. Through dialogue, we share experiences and set priorities together. This occurs on a regular basis at company events, meetings, job fairs, joint audits and via social media. We also receive feedback through employee- and customer-satisfaction surveys.

We believe that challenges are best solved collaboratively. That's why we connect with our industry peers, UN Global Compact Nordic Network as well as through our membership with the EICC. 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.

This Sustainability Report has been prepared in accordance with the GRI Standards (Core Option). To that end, in 2016, we successfully carried out a stakeholder analysis and stakeholder dialogue.



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., at 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

Materiality Assessment

The results of our materiality assessment are central to our future **corporate sustainability strategy**, and enable us to set targets and risks from an environmental, social and economic perspective.

In the summer of 2016, we calibrated the materiality assessment, based on input received from our stakeholder survey. Our most recent 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.

The materiality analysis is also essential for conducting risk management. We have concluded that our most important material topics will be grouped as follows: People; Ethics and Governance; Responsible Sourcing; Society; and Environment. This Sustainability Report is based on the results of our analysis conducted during the review period.

Material aspects



Atea's role in meeting the Sustainable Development Goals

Atea is committed to be a part of achieving these goals and have identified **five SDGs** where our business has the greatest impact.

Established in 2015, the United Nations' Sustainable Development Goals (SDGs) set targets and indicators that UN member states will use to frame their policies over the next 15 years. As an organization that believes in corporate responsibility, Atea is committed to doing its part in this work. Of the seventeen goals that comprise the SDGs, Atea has identified five where it can contribute to have the most meaningful impact: Gender Equality; Industry, Innovation and Infrastructure; Responsible Consumption and Production; Climate Action; and Peace, Justice and Strong Institutions.

For reporting purposes, we have distilled our SDG-focused activities into five areas—each showcases specific actions that Atea has taken in 2016:

1. **SDG5:** Advocating for equality of people and of opportunity while promoting and rewarding hard work;
2. **SDG16:** Ensuring a well-defined *Code of Conduct* and strong governance;
3. **SDG12:** Taking a bold step forward in responsible sourcing of IT components;
4. **SDG9:** Helping those who are in need in society, both at home and abroad; and
5. **SDG13:** Playing a stronger caretaker role for the environment.



13.
Atea is determined to reduce our environmental impact by focusing on our carbon footprint.

9.
With "Internet of Things" solutions, Atea contributes to public safety, enhance resource management, and sustain the environment.

16.
Our work with anti-corruption and data privacy is a part of our work with SDG16.

5.
We support initiatives to promote more women to work in the ICT sector.

12.
We have strengthened our efforts in order to control our supply chain. Our recycling system, GotITloop, is a way of promoting a circular economy.

OUR PEOPLE

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People



Atea's long-term success is **dependent on recruiting skilled IT professionals.**

Our Approach

Atea's long-term success is dependent on recruiting skilled IT professionals, and providing its employees with a work environment in which they can develop and contribute with their talents. This work environment and culture is central to Atea's vision of being "The Place to Be" for its employees, customers and vendors. Ensuring healthy and safe conditions in a workplace that gives everyone an equal opportunity to succeed and thrive are fundamental in everything we do. By working hard to meet both national and international labor laws in every country in which it operates, Atea sets its sights on even higher goals: promoting greater empowerment, wellness and confidence in all its people. Approximately 90 percent of our employees are covered by collective bargaining agreements and/or universally binding collective agreements.

Empowerment

Atea values having a learning culture for our employees. Our people are continuously trained in leadership, management and other areas connected to our expertise in IT.

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.

Previously in 2015, Atea Academy was launched, which is an e-learning platform for employees. Training related to our business systems, values, ethical guidelines and corporate culture has been carried out with the help of this platform. 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. Therefore, it is essential 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 ILO. Hazards are identified and monitored to prevent accidents and occupational illness. Guidelines for the workplace are monitored to ensure a healthy and 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.

The risk of occupational injury is very low. In 2016, there were no occupational injuries resulting in absence.



Diversity and Inclusion

Promoting gender equality, inclusion and diversity in the workplace are core values at Atea. This is consistent with our increased focus on the UN's Sustainable Development Goals: we have increased efforts in support of SDG5 (gender equality).

Atea also strives to prevent discrimination in the workplace. Our efforts are consistent with what's prescribed in the *Anti-Discrimination Act*. Our management promotes equality of opportunity within its employment practices.

The percentage of female employees within Atea is consistent with industry in which the company operates. However, since we believe diversity is good for productivity and women are a growing portion of the global talent pool, we strive to recruit women at all levels as well as promoting activities to ensure they remain with Atea. There are ongoing initiatives aimed at increasing diversity within the group, such as supporting programs 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 the necessary modifications to the physical environment to enable them to perform their work.

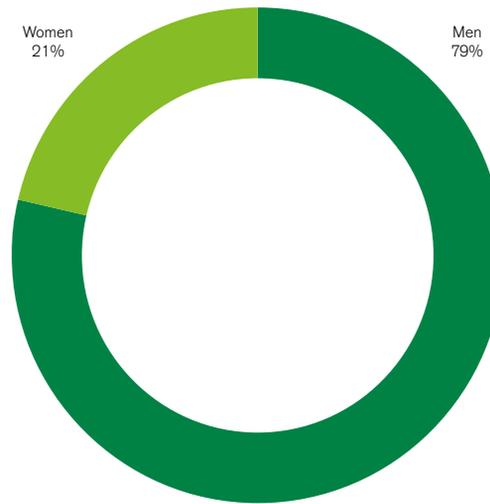
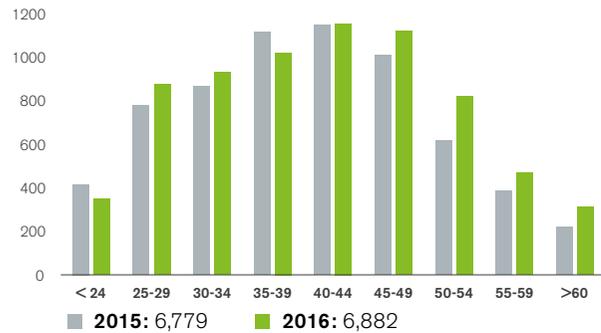
In 2016, Atea Sweden started a collaboration with the Swedish job placement agency, Arbetsförmedlingen, designed to integrate newly arrived asylum seekers in Sweden into the labor market. This successful undertaking will continue in 2017.



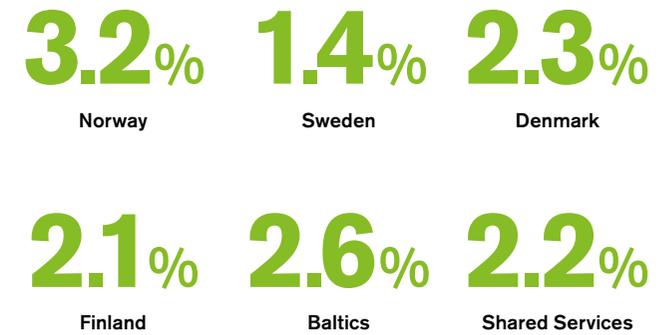
6,882

Total numbers of full-time employees

Age Breakdown Atea Group
2015 – 2016



Gender percentage in Atea Group



Sick leave per country



40% women
60% men

Gender distribution Board of Directors



Half of the members
30-50, half 50+

Age distribution Board of Directors

2.2%

Sick-leave
Atea Group

ETHICS & GOVERNANCE

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Ethics and Governance



The foundation of our **anti-bribery and anti-corruption program** consists of several elements. These are designed to reinforce and strengthen our culture, identify and proactively address potential issues.

Our Approach

Atea is committed to conducting our business in an honest and ethical manner. Atea has a zero-tolerance approach to bribery and corruption. This message is enforced by the Board of Directors, CEO and Group Executive Management.

Ethics and governance are important to Atea because they are matters of trust. This trust depends on its employees acting in accordance with the company's core values, work methods and ethical guidelines. While core values and rules of professional conduct have long been in place at Atea, these were tested recently. The results of a widely reported incident within Atea Denmark in 2015 demonstrated a need to further strengthen Atea's governance routines related to ethics and conduct.

In response, we chose to develop a completely revised *Code of Conduct*: not only to respond to the 2015 incident, but also to ensure Atea's capabilities keep pace with changing times. Our measures include an anti-bribery and anti-corruption program, designed to reinforce and strengthen our culture, identify and proactively address potential issues. We have also sharpened our control routines on expenses and customer events to ensure they are in compliance with the law and good business practices.

All employees are required to complete 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. As of the end of 2016, 100 percent of Atea employees had passed all training.

Compliance with laws and regulations will also be evaluated on a regular basis. In 2017, Atea's compliance officers will ensure continuous improvement by periodic testing and reviews, such as anti-corruption monitoring and internal audits. This is designed to signal that Atea's management is committed to anti-corruption compliance, and raise awareness about the importance of having a solid ethical framework in which to do business.

Atea has implemented a "Whistleblower Hotline". In 2017 this will be further developed and managed by a third party. This hotline ensures employees have the opportunity to confidentially raise concerns about potential violations of the *Code of Conduct*, law or business ethics. These matters are raised with a compliance officer outside of their local organization and management structure.



Anti-Bribery and Anti-Corruption

Background: The Region Zealand Case in Denmark

On March 2, 2017, Atea A/S (“Atea Denmark”) was presented with a formal prosecution (norsk: tiltale) as the legally responsible entity, of bribery and embezzlement carried out by four former employees in the company, in a time period from 2009-2014. The four persons were employed at Atea Denmark at the time the actions took place. No current employees of Atea are charged or under prosecution in connection with the possible corruption case.

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 that was in conflict with Atea’s internal regulations. These actions affected the client Region Sjælland, which was notified, and that marked the start of a comprehensive police investigation in Denmark.

In addition to the former employees, a number of public officials in Denmark have also been charged as a result of the police investigation.

Since the summer of 2015, Atea has implemented a series of measures:

- In accordance with EU anti-corruption and tendering legislation, Atea Denmark has performed a thorough self-cleaning process
- Atea Denmark is undertaking a certification process on anti-corruption (ISO 37001 Anti-Bribery Systems)
- The Atea Group has established a thorough compliance system, including comprehensive control procedures
- The *Code of Conduct* of Atea has been updated and strengthened
- All employees of the Atea Group are required to complete a training program in ethics and the *Code of Conduct*

- The 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 has been established in the Board of Directors (Atea ASA)
- The CFO of Atea ASA, Robert Giori, has been appointed as Group Compliance Officer
- All business units report on compliance quarterly to the governance systems are working

Because 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.



Details of Atea's anti-bribery and anti-corruption program

As part of its anti-bribery and anti-corruption (ABC) program, Atea seeks to obtain an ISO 37001 certification during 2017-2018. We aim at ensuring ISO 37-compliance in 2017, including key elements from U.S. *Sentencing Guidelines* and the UK *Bribery Act Adequate Procedures*.

Our ABC program has four components: **People, Processes, Technology and Communication**. It is designed to reinforce and strengthen our culture, identify and address potential issues in a timely manner, and contain instances of bribery and corruption if they are discovered—all with minimal impact on Atea's business.

A commitment to ensuring 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. The internet is borderless: making it difficult to use a single legal framework to regulate behavior and protect citizens.

It is important, therefore, that companies adopt a principled stand on matters of 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 2016, 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. We are currently in the process of adapting our operations in accordance to the new EU General Data Protection Regulation (GDPR). In 2017, Atea will run a global project to be GDPR-ready, featuring enhanced logging and follow-up on personal data to enhance security.

Knowledge and passion: Atea and General Data Protection Regulation (GDPR)

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 is started which will affect almost all employees with a lot of work and we look forward to be GDPR ready in 2018.

Anti-Bribery and Anti-Corruption program



Compliance Organization

Atea has established a **compliance organization**, with continuity from Board of Directors of Atea ASA to management and personnel of local companies.

Ensuring compliance

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



RESPONSIBLE SOURCING

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Responsible Sourcing

During 2015 and 2016, Atea visited **several mines in Democratic Republic of the Congo** and **factories in Eastern Asia** to get a better understanding of our supply chain.

Our Approach

The supply chain of electronic devices involves hundreds of manufacturers – collaborating on individual components across different countries. Without a commitment from companies, and engagement from customers, state and civil society, there is a risk that components manufacturing is not sustainable for workers, that minerals used indirectly finance or benefit armed groups or that dangerous chemicals enter the local ecosystem because of poor handling practices.

Gaining an understanding of how and where the devices are made is a major undertaking, and so is assessing the ability of manufacturers in managing risks. Atea chooses to take a comprehensive view of sustainability challenges in our supply chain.

We are deeply committed to understanding our supply chain and to assessing our suppliers responsible sourcing of materials that go into our products and services. As one of the largest customers in the Nordic and Baltic regions for electronic devices and hardware, we are in a unique position to work with our partners to create lasting, positive change in this area.

Having a Presence in the Supply Chain

Atea matches its commitment with action. We meet and engage our critical suppliers directly. We assess their work systematically and collaborate with them to address salient and pressing issues in supply chain management. We note where stakeholders pressures for companies to take an active role in supply chain sustainability are intensifying, and we welcome the commitment of our customers to making sustainable manufacturing a priority.

We are hands-on in our approach. We choose to work where the risks are, and to establish relationships with the most critical suppliers at different tiers in our supply chain. In 2016, Atea continued to send staff to factories in China to evaluate working conditions and understanding our suppliers' challenges in complying with our standards.

Being a Vocal Advocate for Change

Atea's Supplier *Code of Conduct*, adopted in 2016, sets out clear expectations for its suppliers, making it mandatory that goods be manufactured in accordance with standards set by the Electronic Industry Citizenship Coalition (EICC).

100%
of all new manufacturing suppliers of commercial relevance screened using social and environmental criteria

85%
of suppliers, in terms of purchasing volume, assessed for negative social and environmental impacts in the supply chain

0
supplier relationships terminated after supplier social and environmental assessment

2
companies under scrutiny relating to how they manage social impacts such as forced labour



In 2016, Atea became the world's first value-added reseller to join the EICC as a member; an important step in ensuring that its voice is heard on best practices on supply chain sustainability. Atea also sent senior staff to participate at the EICC's annual conference in the United States.

Assessment and Enforcement

We assess our partners against their commitment to upholding EICC standards in their own operations and supply chain. With this framework, we evaluate their ability to address impacts and the level of transparency in their work.

This approach has resulted in an overall improvement in how Atea assesses its suppliers.

During 2016, we exceeded our target of assessing 85 percent of spend. Crucially, we were able to enhance our assessments of direct suppliers. This included in-depth dives into over ten sub-suppliers, through (among others) four site-visits, documentation analysis and dialogue with direct suppliers. The overall target for 2020 is to assess 95 percent of spend.

Our assessment concluded that the vast majority of products we deliver to our customers – measured in terms of spend – are manufactured by partners that have good management systems for addressing risks and impacts in the top tiers of their supply chain. These partners have put in place some significant measures to reduce and prevent such negative impacts.

Equally important, all measures are backed by a commitment to act where necessary. If Atea discovers a specific risk in its supply chain, these are addressed through direct dialogue with the supplier. This can include an assessment of documentation, site visits and contact with sub-suppliers where necessary. Depending on the severity of issues uncovered, a correction action plan is formulated. If risk reduction measures remain inadequate, Atea's business relationship with a supplier may be terminated.

In 2016, we undertook a follow-up of two suppliers to identify opportunities for improvement. A follow-up to probe into potential management system risks is ongoing for a further four suppliers. We did not pause or terminate any commercial relationships with direct suppliers as a result of our assessments.

MAKING A DIFFERENCE WITH RESPONSIBLE SOURCING

- Greater clarity via *Code of Conduct*
- Ensuring compliance through a hands-on approach
- Being a vocal leader via membership and advocacy in Electronic Industry Citizenship Coalition.



ATEA JOINED THE EICC AND RRMi DURING 2016

EICC is a non-profit coalition of electronics, retail and auto and toy companies committed to supporting the rights and well-being of workers and communities worldwide affected by the global electronics supply chain.

Responsible Sourcing: a View from the Inside

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

Q What were the highlights of 2016 from the perspective of Atea on responsible sourcing perspective?

Our work on responsible sourcing accelerated dramatically. We clarified expectations of suppliers through the *Supplier Code of Conduct*. We strengthened our strategy and joined the EICC to make our work both efficient and effective. In addition to joining a new initiative on responsible minerals, we received significant attention at the EICC conference.

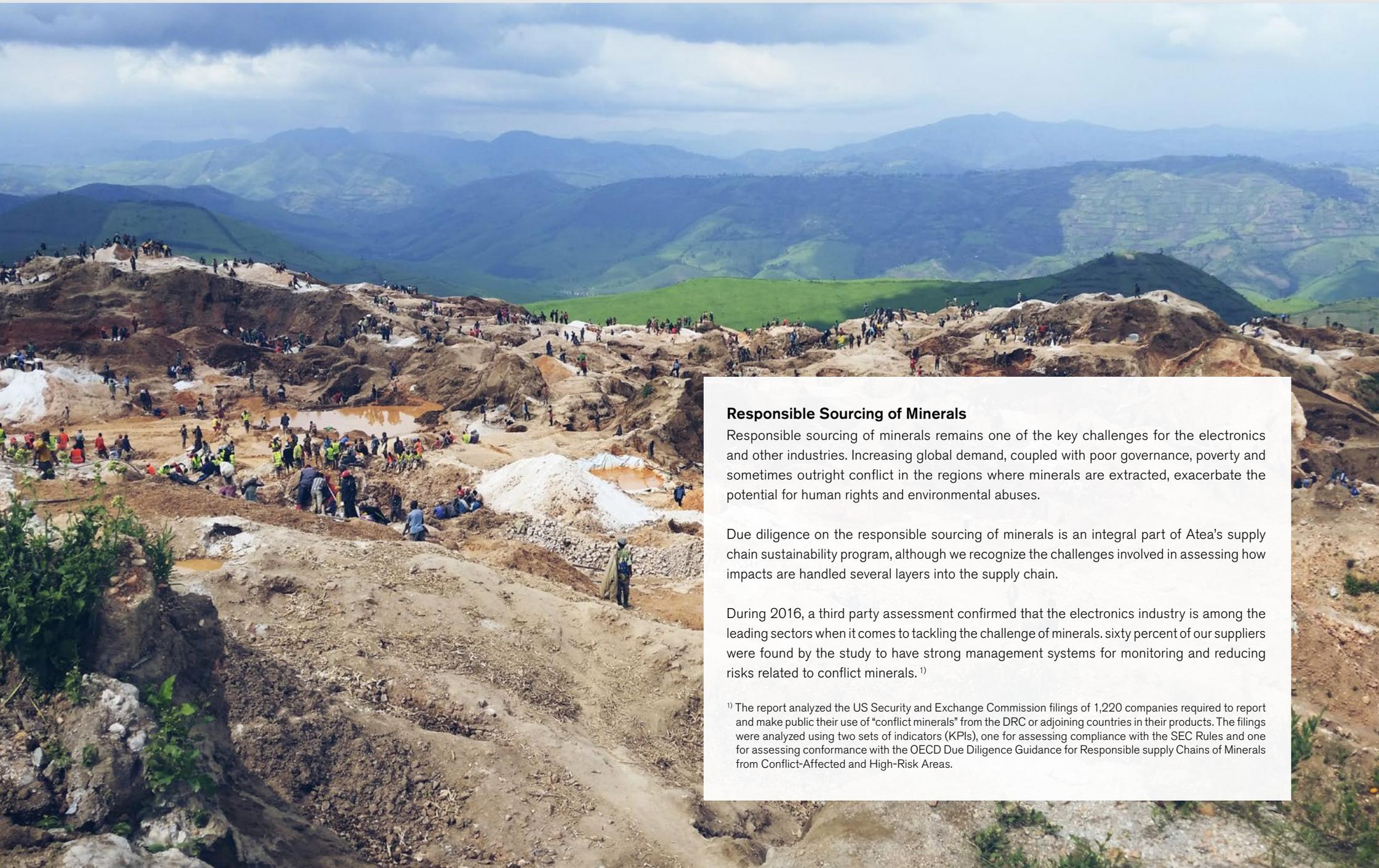
Q Why did we join the responsible raw materials initiative?

Expectations on businesses to deal comprehensively with the risks in the supply chain upstream are increasing while the risks picture is constantly evolving. This is the right forum for us to engage with our suppliers across the whole spectrum of minerals. It helps them consolidate and strengthen their demands and approaches.

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 EICC. Others are following our example. That's gratifying.





Responsible Sourcing of Minerals

Responsible sourcing of minerals remains one of the key challenges for the electronics and other industries. 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 and environmental abuses.

Due diligence on the responsible sourcing of minerals is an integral part of Atea's supply chain sustainability program, although we recognize the challenges involved in assessing how impacts are handled several layers into the supply chain.

During 2016, a third party assessment confirmed that the electronics industry is among the leading sectors when it comes to tackling the challenge of minerals. sixty percent of our suppliers were found by the study to have strong management systems for monitoring and reducing risks related to conflict minerals.¹⁾

¹⁾ The report analyzed the US Security and Exchange Commission filings of 1,220 companies required to report and make public their use of "conflict minerals" from the DRC or adjoining countries in their products. The filings were analyzed using two sets of indicators (KPIs), one for assessing compliance with the SEC Rules and one for assessing conformance with the OECD Due Diligence Guidance for Responsible supply Chains of Minerals from Conflict-Affected and High-Risk Areas.



Atea has visited mines in DR Congo and factories in China, to better understand our supply chain.



Did you know:
Atea won the award
"Excellent Sustainable
Supplier" by the Swedish
Competition Authority in 2015.



SOCIETY

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| Everywhere Digital: the Internet of Things | 30 |
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Society



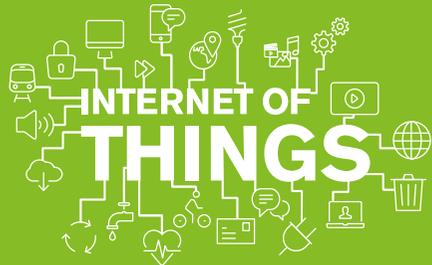
We believe that the **access to technology** can help both people and society to reach their potential.

Our Approach

Atea's products and solutions make a difference in improving the efficiency of public institutions, communities, businesses, private entities, and the quality of life for people within the Nordic and Baltic region. From making public services such as health and education function more effectively to boosting private sector growth, we contribute with innovative solutions. By providing IT infrastructure of the highest quality, Atea creates the foundation for a smarter and more innovative Europe.

A more digital society is one that has more opportunities and more challenges. Consider how digitalization is helping in the health sector. Secure systems help improve the flow of information between the elderly care and medical services. It helps make person-to-person services function more efficiently: routine checks by doctors on their patients can happen faster by using in-home video conferencing and a wider application of built-in sensors.

EVERYWHERE DIGITAL: THE INTERNET OF THINGS



Embedded IT infrastructure into everyday devices and objects means a better future where public and private institutions can envision bold solutions for public safety, resource management and environmental protection. Atea is proud to be a leader in envisioning new applications in this "everywhere digital" world of tomorrow.

HUMAN INNOVATION IN ACTION

CONNECTING PEOPLE IN TIMES OF CRISIS

Atea Anywhere is an innovative IT solution that unites all communications on one platform. In 2016, Atea Norway revolutionized the way officials in that country handled and processed a tidal wave of asylum seekers. Thanks to its video-interview based application, Atea Anywhere meant that some 24,000 applicants who had arrived in Norway could be processed quickly and thoroughly by the Norwegian Directorate of Immigration.

BRIGHTER LIGHTS FOR LESS

Working together, Atea and the City of Vilnius implemented an all-new LED lighting system for the Seimas: Lithuania's parliament building located in the heart of the capital. Doing more with IT means the city earns substantial savings on energy use annually. Estimates indicate that this unique investment will pay off after a little more than one year and continue to provide benefits for years to come.

Making a Difference with IT: reconnecting young refugees for a fresh start

MAKING A DIFFERENCE AT HOME AND ABROAD

- Reconnecting young asylum seekers in Denmark.
- Reaching out beyond borders with charity, fundraising and more.
- Atea ranked by the Global Child Forum as a leading company for work in addressing children's rights.

In 2016, as many parts of the world worked to respond to a significant upsurge in refugees seeking asylum, employees at Atea Denmark asked themselves what they could do to make a difference.

“We have an obligation as citizens to help,” says Morten Felding (Managing Director, Atea Denmark), “but we also wanted to do something where our people could be directly engaged and see for themselves the people they were helping.”

Out of this deep desire, their PCs for refugees program was created. Working with vendor partners and Atea's own IT recycling program, 650 newly refurbished PCs preloaded with productivity and video-conferencing software were provided to young asylum seekers in Denmark.

“They had nothing,” says Felding. “These were children separated from their families, all alone in a different country. What this program meant for these children was more than just gaining a much-needed tool to reconnect online with family in their countries of origin. It also provided them with a powerful educational and creative tool to help create a new start in life.”

Reaching out beyond borders

Atea's charitable activities are an expression of our common Nordic values: being mindful and caring for others less fortunate, at home and beyond our borders.





In 2016, Atea was ranked as one of the leading companies working with children's rights by the Global Child Forum.



Social Efforts

In 2016, Atea was ranked as one of the leading companies working with **children’s rights by the Global Child Forum**. We were cited in the group’s report “The Corporate Sector and Childrens Right in the Nordic Region,” in which 300 companies were assessed.

A more digital society is a more responsible society: one that gives back through charitable actions. Atea’s CEO Steinar Sønsteby says it best: “what is good for society is good for business.” We seek to give back to society and to make a difference in the world by making full use of that same knowledge and creativity we employ in serving our customers.

In 2016, here are highlights of charity-based activities undertaken by Atea and its employees:

- Atea Sweden initiated the Atea Helping Hands fund, supporting a range of social projects. Among these is an anti-poverty sponsorship initiative for Meledayalam: a village of 1,600 inhabitants located in Southern India. This fund also serves as the conduit for Atea Sweden to donate to Save the Children.

- Atea Finland has continued its cooperative program with the Finnish Red Cross (FRC). Since 2013, employees have collected money for FRC’s health projects in developing countries. Most recently, this included attending the Chain Reaction campaign: from May to September Atea’s The Place to Bike team cycled a total of 13,650 km to raise funds for this campaign.
- In its Hunger Day campaign, Atea Finland employees collected donations for FRC’s Catastrophe Fund, selling pastries, collecting money on the streets with traditional collection boxes and by donating to a virtual collection box via atea.fi’s website. Employees also made food donations to a Christmas Spirit campaign, and fundraised for a Save the Children’s fundraiser for Syrian children.
- Atea Norway continued its support of Prosperity Girls’ High School in Sierra Leone. This program, in effect since 2012, is designed to encourage girls in that country to stay in school. Of the more than 400,000 children currently not enrolled in school in Sierra Leone, the majority are females. Key reasons for this include poverty, child marriages, pregnancy, health and sanitation issues. Coordinated by Foreningen Norge, Atea’s contributions have resulted in the construction of a senior secondary school, boosting student enrollment from 120 to 200.
- 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.

What is good for society is good for business

– Steinar Sønsteby,
CEO



- Atea Denmark has supported BØRNEfonden since 2007. This program focuses on improving the quality of life and providing a safe and secure upbringing for children primarily in Western Africa, including Benin and Burkina Faso. The foundation has supported more than 73,000 children and their parents. As a result of this support, Atea has contributed to the following projects: the sponsoring of 50 school children, the construction of new school facilities, the construction of latrines, offices and warehouses, and the installation of solar panels on schools and health clinics.
- Atea Baltics for several years has been actively involved as a founder of non-profit NGO organization “Langas ateit”, the main goal of which is to add to the development of the information society in Lithuania including all target groups: seniors, youngsters, school community, etc. Atea Baltics is not only supported the NGO financially but also has been actively involved in the national campaigns organized by “Langas ateit”. The most well-marked events are national campaigns: Safer internet week and Get Online week, which invited volunteers from Atea Baltics to participate directly providing lectures on safer internet issues for school community: 300 primary school teachers have been trained online in coding basics, over 200 kids were introduced to the most important rules handling their personal identity online and safe behavior.



ENVIRONMENT

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Environment



Atea was awarded the prize “**Green Role Model**” during 2016, due to our environmental efforts.

Atea adopts the same creative, knowledge-driven approach to the environment that it uses to achieve results for customers and employees. It matters because we are each caretakers of the planet: everyone has a role to play in ensuring that growth is sustainable and that we act responsibly with what we make, use and sell.

For many years, we have worked to reduce our impact on the planet and promote responsible growth. Therefore, we see it as crucial to integrate the UN's sustainable development goal of “Climate action” into our operations.

Reducing CO₂

Atea recognizes the impact our operations needs to take into account every stage of our product lifecycle, not only that which occurs inside our business. Therefore, Atea is working closely with suppliers, partners and customers on how to minimize the impact of our products. We also seek to inspire them to make responsible and climate-smart choices. Since a large part of our CO₂ footprint is derived from logistics, we are in regular contact with the distribution companies within our supply chain to continually uncover more efficient and more environmentally friendly alternatives to transporting goods.

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. 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. Since 2015, we reduced our CO₂ emissions per employee by 7 percent on a group level. In 2017 we will focus on setting science based targets at a group level, this will likely include a CO₂ emissions reduction of 50 percent per employee, on average by 2020.

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. Web-based 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 144 tons of CO₂. Atea has chosen projects such as tree planting in Malawi and to the Swedish

invention Solvatten, a solution that gives access to clean, hot water to impoverished people throughout the world.

At Atea Denmark, an energy optimization program is also having a significant impact on our CO₂ levels. It focuses on asking: Are we using our equipment the right way? And are we doing all that we can to reduce our carbon footprint on the planet? It also entails widespread use by employees of the Atea GO app: a custom-made application designed to help employees who are travelling for business to team-up on their trips.



144 tons of CO₂

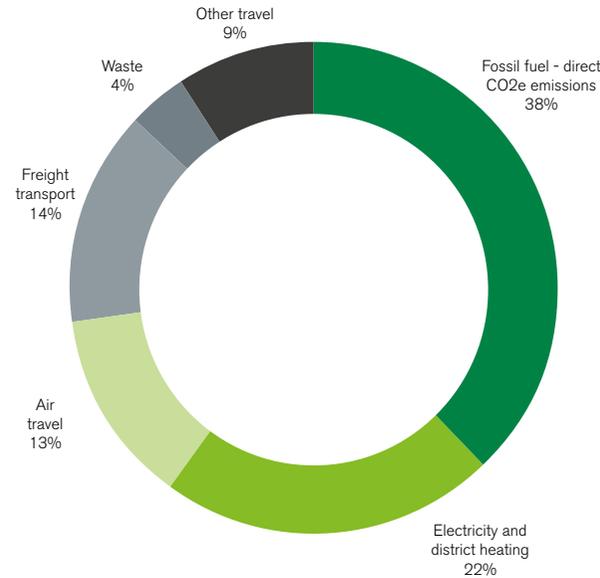
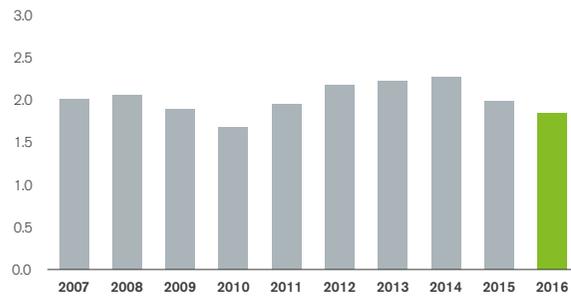
Atea has projects such as tree planting in Malawi to compensate for the remaining emissions from our largest customer event.



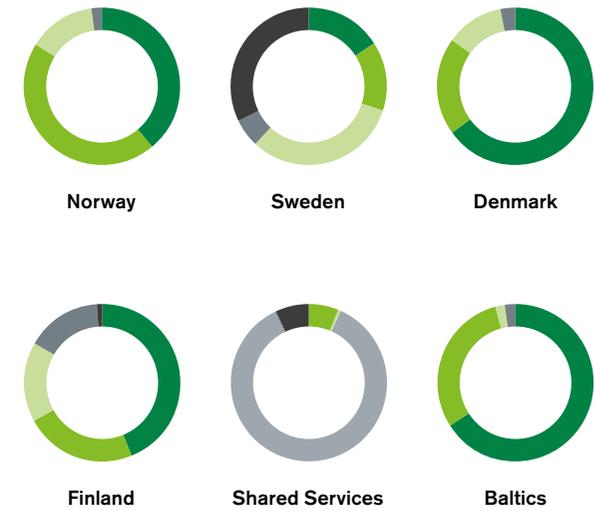
11,809

GHG emissions in tCO₂e

tCO₂e/FTE
2007 – 2016

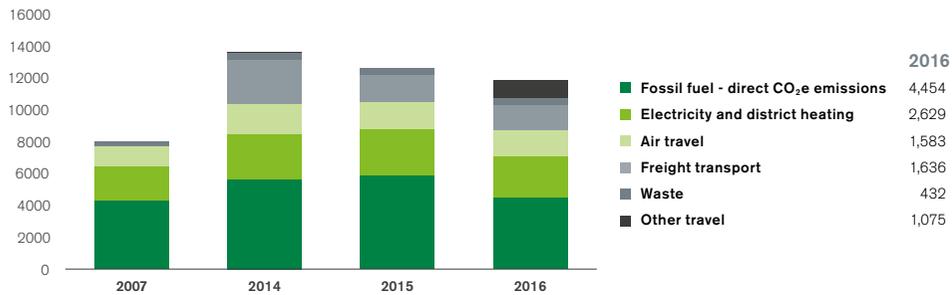


Group emissions per source



Group emissions per divisions

Total annual tCO₂e by source
2007 – 2016



-7%
Reduced CO₂ since 2015
(Group level)

B
CDP Score



Atea's GoITloop: making a difference

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.

It is an innovative idea that's caught on across the company.

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.

TO MEET CUSTOMER DEMANDS, ATEA'S GOITLOOP ACHIEVED THE FOLLOWING IN 2016:

Increasing volume: We processed 377,922 units – a 22 percent increase from the previous year.

Wider range of devices supported: In addition to PCs, mobile devices (i.e., smartphones and tablets) are now reused and recycled – that's up 400 percent since 2015.

Improving transparency: Showing GoITloop customers what happens to all metals and other materials that are recycled and reused, demonstrating the positive environmental difference they are making for the benefit of everyone.

All GoITloop activities are ISO 14001-approved. Around 50 percent of all IT equipment received can be reused or resold. The remaining IT equipment is recycled in a secure and environmental friendly way. The Goitloop concept makes perfect business sense because it has become everyone's business to save resources and energy.

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 **GoITloop 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 GoITloop for recycling and sales has increased steadily for the past five years.

Of the 377,922 devices per year handled by Atea Logistics in Växjö:

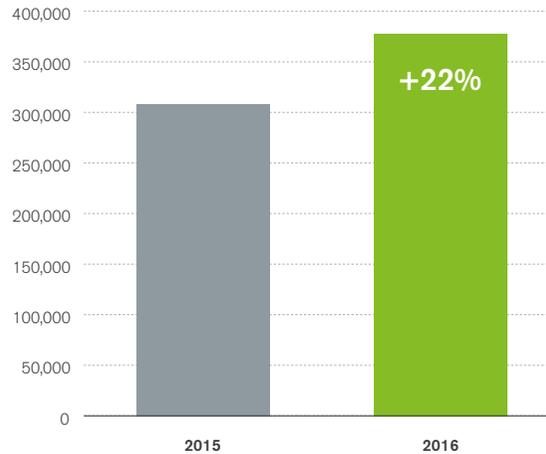
- 55 percent are recycled and sold to schools, companies and organizations.
- 45 percent are scrapped and sent to subcontractors for recycling.
- From this scrap, 99.7 percent of the material is recycled and 0.3 percent is sent to landfill.
- 10,000 loops are managed.

The trend is clear: more people today realize the value of recycling. But security is equally important. GoITloop 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."

377,922
Units recycled/reused (2016)



Units recycled/reused

Did you know:

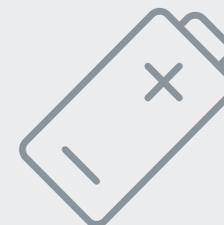
- We extend the life cycle of 4 of 5 used clients and mobile devices
- Our recycling operation is ISO 14001:2015 certified



225,324 kg
Recycled paper & cardboard



10,220 kg
Recycled plastics



49,729 kg
Combustible and managed industrial waste



INDICES

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| Communication on Progress | 53 |
| Key Figures Group (2012-2016) | 54 |



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, 53 | | |
| GRI 102-8 | Total workforce | | 16 | | |
| GRI 102-9 | Organization's supply chain description | | 23 | | |
| GRI 102-10 | Significant changes to the organization and its supply chain | | | | No significant changes during 2016 |
| 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 | | 10 | | |
| Strategy | | | | | |
| GRI 102-14 | Statement from senior decision-maker | | 4 | | |
| Ethics & Integrity | | | | | |
| GRI 102-16 | Values, principles, standards and norms of behavior | | 18, 21 | | |
| Governance | | | | | |
| GRI 102-18 | Governance structure | | AR, page 113 | | |



| 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 | | 10 | | |
| GRI 102-41 | Collective bargain agreement | | 12 | | 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 | | 10 | | |
| GRI 102-43 | Approach to stakeholder engagement | | 10 | | |
| GRI 102-44 | Key topics and concerns raised | | 10 | | |
| Reporting practice | | | | | |
| GRI 102-45 | Entities included in the consolidated financial statements | | 53, AR, page 54 | | |
| GRI 102-46 | Defining report content and topic Boundaries | | 10 | | |
| 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 | | 15.03.2016 |
| 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.se |
| GRI 102-54 | Claims of reporting in accordance of GRI Standards | | 10 | | This report has been prepared in accordance with the GRI Standards: Core option |
| GRI 102-55 | GRI Content Index | | 43 | | |



| 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 2016 | | | | | |
| GRI 103: Management Approach | | | 49 | | |
| GRI 205-1 | Total number and percentage of operations assessed for risks related to corruption and the significant risks identified |  | 18 | Code of Conduct | |
| GRI 205-2 | Communication and training on anti-corruption policies and procedures |  | 18 | Code of Conduct | |
| GRI 205-3 | Confirmed incidents of corruption and actions taken |  | 19 | Code of Conduct | |
| GRI 418: Customer privacy 2016 | | | | | |
| GRI 103: Management approach | | | 49 | | |
| GRI 418-1 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data |  | 20 | | |
| Environment | | | | | |
| GRI 305: Emissions 2016 | | | | | |
| GRI 103: Management approach | | | 52 | | |
| GRI 305-1 | Direct greenhouse gas (GHG) emissions (scope 1) |   | 36 | Carbon Footprint Report | For more information, see our Carbon Footprint Report |
| GRI 305-2 | Energy indirect greenhouse gas (GHG) emissions (scope 2) |   | 36 | Carbon Footprint Report | For more information, see our Carbon Footprint Report |
| GRI 305-3 | Other indirect greenhouse gas (GHG) emissions (scope 3) |   | 36 | Carbon Footprint Report | For more information, see our Carbon Footprint Report |
| GRI 305-5 | Reduction of greenhouse gas (GHG) emissions |   | 35 | 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 | | | 48 | | |
| 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 | | 12, 16 | | |
| GRI 405: Diversity & Equal opportunity 2016 | | | | | |
| GRI 103: Management Approach | | | 48 | | |
| GRI 405-1 | Composition of governance bodies and breakdown of employees per employee category according to gender, age group and other indicators of diversity | | 16 | Code of Conduct Diversity policy | |
| Responsible sourcing | | | | | |
| GRI 308: Supplier environmental assessment 2016 | | | | | |
| GRI 103: Management approach | | | 50 | | |
| GRI 308-1 | Percentage of new suppliers that were screened using environmental criteria | | 23 | Code of Conduct | |
| GRI 308-2 | Significant actual and potential negative environmental impacts in the supply chain and actions taken | | 23 | Code of Conduct | |
| GRI 408: Child Labor 2016 | | | | | |
| GRI 103: Management approach | | | 50 | | |
| 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 | | 23 | Code of Conduct | |
| GRI 409: Forced or compulsory labor 2016 | | | | | |
| GRI 103: Management approach | | | 50 | | |
| 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 | | 23 | Code of Conduct | |
| GRI 414: Supplier social assessment 2016 | | | | | |
| GRI 103: Management approach | | | 50 | | |
| GRI 414-1 | Report the percentage of new suppliers that were screened using criteria for impacts on society | | 23 | Code of Conduct | |
| GRI 414-2 | Significant actual and potential negative impacts on society in the supply chain and actions taken | | 23 | Code of Conduct | |



Management Approach of Disclosures

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 2016

- In 2016, 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 2016 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 2016, there were no occupational injuries resulting in absence.

People



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 2017.

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 introduced an anti-bribery and corruption program and in 2017 additional training will be carried out with senior management including compliance officers as part of this program. In 2017, it will become mandatory for all newly 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.

We aim at ensuring ISO 37-compliance in 2017 including key elements from U.S. Sentencing Guidelines and the UK Bribery Act Adequate Procedures. The chief compliance officer is in charge of the whistle blowing tool. In 2017 we will introduce a third-party observation of this function.

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. During 2017 Atea will run 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 2016

Anti-Corruption & Bribery

- Atea has during 2016 begun to implement an anti-bribery and corruption (ABC) program.
- As a result of the incident in Atea Denmark, a self-cleaning process stated in 2016.
- 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 2016.
- During 2016, 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.

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 2016

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 *EICC Code of Conduct* – the industry standard supported by more than 110 member companies and over 6,000 suppliers. This year, we adopted the EICC 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 EICC, 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. The Supply Chain Sustainability Program is controlled by Atea Swedens:s procurement department.

Responsible Sourcing

We assess our partners against their commitment to upholding the EICC 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 EICC, 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 (EICC). Through our EICC membership we were able to enhance our assessments of direct suppliers with an in-depth dive into over 10 sub-suppliers, through among others 4 site-visits, documentation analysis and dialogue with direct suppliers.
- During 2016, we exceeded our target of assessing 85 percent of spend, which also exceeds the EICC membership compliance requirements.
- We undertook a follow up of 2 suppliers which allowed us to identify opportunities for improvement, and a follow-up to probe into potential management system risks is ongoing for a further 4 suppliers.
- In late 2016, we became one of the early supporters of CFSI and EICCs Responsible Raw Materials Initiative.



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 2016

Society

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.

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.

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.

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.

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.

Digitalization

Every product and services area follow up their digital collaborations and projects.

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.

Digitalization

- In 2016, we collaborated in several interesting digitalization projects. More information can be attained in the sustainability report and/or national websites.

Charity engagements

- 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. We got this recognition thanks to our approach on working in the intersection of education and digitalization.



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 2016

Environment

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.

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 offset for the Swedish customer magazine, *Tomorrow*.

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.

Environment

- We achieved a reduction of 7 percent on a Group level since 2015.
- During 2016, we have carbon compensated for 140 ton CO₂.

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 2016, Atea's concept GoITloop recycled 377,992 units.
- During 2016 we have started collaborating with a new recycling partner.

Communication on Progress

This 2016 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> • <i>Supplier Due Diligence</i> |
| | 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> • <i>Environmental policies</i> |
| | 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> • <i>Governance Documents for the Companies in the Atea Group (including Ethical Guidelines)</i> |

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 (2012-2016)

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



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.

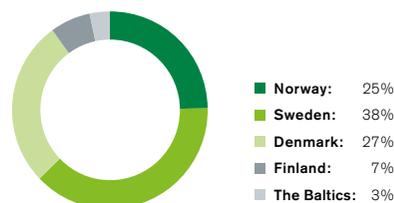
Robert Giori has an MBA from Harvard University and a Bachelor degree from Stanford University. He has completed the Certified Public Accountant (CPA), Certified Management Accountant (CMA) and Chartered Financial Analyst (CFA) examinations in the United States.

| NOK in million | 2012 | 2013 | 2014 | 2015 | 2016 |
|---|--------|--------|--------|--------|--------|
| Revenue | 20,930 | 22,096 | 24,588 | 27,904 | 31,188 |
| Contribution | 5,062 | 5,320 | 5,717 | 6,403 | 6,939 |
| Contribution margin (%) | 24.2 | 24.1 | 23.3 | 22.9 | 22.2 |
| EBITDA * | 824 | 800 | 958 | 951 | 1,129 |
| EBITDA-margin (%) * | 3.9 | 3.6 | 3.9 | 3.4 | 3.6 |
| EBITDA | 811 | 701 | 929 | 924 | 1,085 |
| EBIT | 560 | 355 | 584 | 514 | 677 |
| Earnings per share (NOK) | 5.08 | 3.33 | 4.14 | 3.76 | 4.87 |
| Diluted earnings per share (NOK) | 5.04 | 3.31 | 4.10 | 3.71 | 4.80 |
| Dividend per share (NOK) | 5.00 | 9.50 | 6.00 | 6.50 | 6.50 |
| Net financial position | 49 | -419 | -829 | -750 | -350 |
| Cash flow from operations | 783 | 874 | 959 | 1,287 | 1,404 |
| Liquidity reserve | 1,834 | 1,326 | 1,628 | 1,573 | 2,362 |
| Equity ratio (%) | 38.9 | 31.6 | 28.1 | 25.3 | 23.8 |
| Number of full-time employees at the year end | 6,185 | 6,280 | 6,504 | 6,779 | 6,882 |

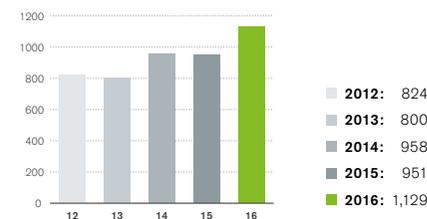
Revenue
2012 – 2016 (NOK in million)



Revenue per country
2016



EBITDA ¹⁾
2012 – 2016 (NOK in million)



¹⁾ Before share-based compensation, expenses related to acquisitions.

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THE PLACE TO BE

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