



Report on

# Responsible Business Conduct 2020

for Lilleborg as (Orkla Home & Personal Care and Lilleborg)

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# SUSTAINABLE DEVELOPMENT GOALS



## To Readers Of The Report

Business is key for the achievement of the Sustainable Development Goals (SDGs). A well-functioning and responsible business community contributes to sustainable development through job creation and innovative solutions to global challenges. However, business operations can also have a negative impact on people, the planet and the society. Members of Ethical Trade Norway have committed themselves to work with due diligence for a more sustainable business practice.

The basis of this work is Ethical Trade Norway's Declaration of Principles, which covers the decent work agenda, human rights, environment/climate, anti-corruption and animal welfare. Members are obliged to report annually on challenges they face and on measures carried out to address these. The reporting template is this year for the first time based on the OECD due diligence model. It is new for us and new for our members. It is this report you are currently holding in your hands. The report is publicly available on our website.

The template seeks to respond to the expectations concerning due diligence for responsible business conduct as described in the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises. Ethical Trade Norway's report covers essential elements of the Global Report Initiative (GRI) reporting framework and can be used as a progress report for the Global Compact.

**Heidi Furustøl**

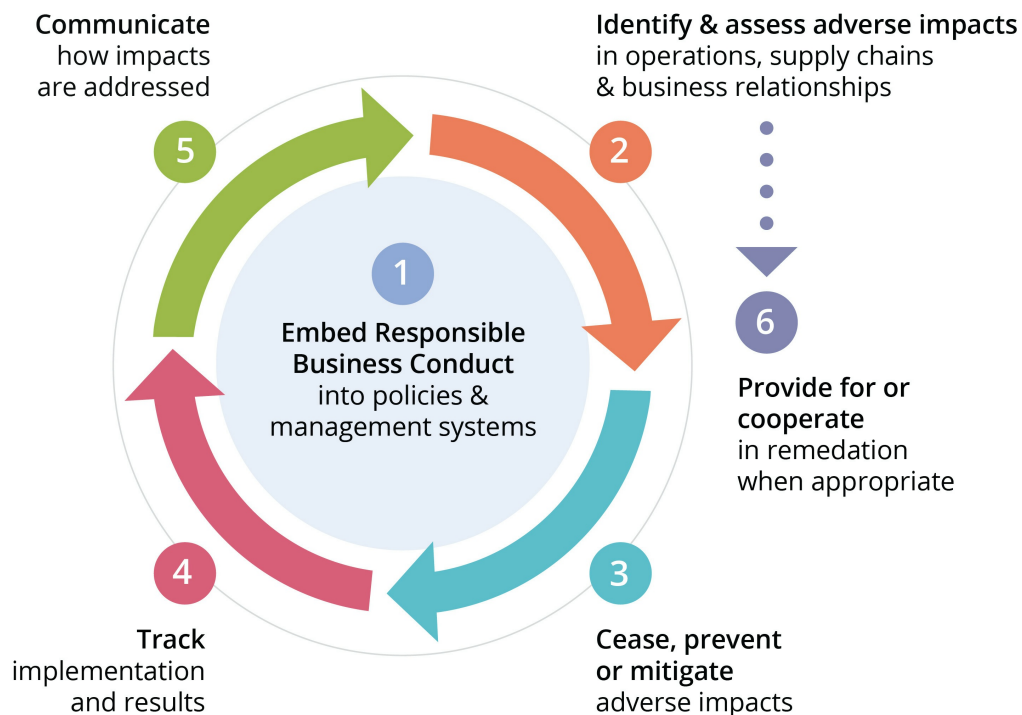
*Executive Director*  
Ethical Trade Norway



# Due diligence

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.

The model has six steps that describe how companies can work for more responsible and sustainable business practice. However, being good at due diligence does not mean no negative impact on people, planet and the society. It means that the company is open and honest about challenges faced and shows how this is managed in the best possible way in collaboration with its stakeholders. This report is divided in chapters following the OECD model.





# Preface From CEO

The Orkla Group is committed to operate in accordance with responsible, ethical, sound business principles. We make stringent demands on ourselves in relation to our impact on the environment and society at large. OHPC/Lilleborg products shall be reliable as to quality, origin and consequences for personal health and environment, and our business shall be sustainable. We want to take our share of responsibility and contribute to solving the global health and sustainability challenges. This means that we make strong demands on our suppliers as well on ourselves, and we have good routines for production as well as how our business influences the external environment, health and safety at the working places. During the last decade OHPC/Lilleborg has strengthen our attention on human rights and working conditions in our contact with our suppliers. Lilleborg became member of Initiativ for Etisk Handel (IEH) 2005, and we received good advice from the organization as to developing detailed demands and routines for how to follow-up suppliers. This work resulted in our set of Code of Conduct (CoC) in November 2005 and since 2010 our CoC's are in dual language, English & Chinese and since 2016 also in Polish. We experience IEH as a competent and valuable discussion partner regarding an area where most often there are no simple answers. To be a member of IEH we are obliged to work actively to improve our supply chain. This work is executed based on IEHs ethical directions for purchasing that covers ethical demand regarding working conditions, environment and different social groups. Being a member of IEH we are also obliged to report annually about our work with ethical trade, which this report is a written response. The report is accessible to the public.

**" "local sustainable living made easy" & "Intertek audits is a great way to get to know your suppliers" "**

Stian Lund  
*CEO OHPC*



# Company information and business context

## Key company information

### Company name

Lilleborg as (Orkla Home & Personal Care and Lilleborg)

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### Head office address

Drammensveien 149, 0277 Oslo

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### Main brands, products and services offered by the company

Home and Personal care products, i.e Lano, Zalo, Omo, Blenda, JIF, Define. etc, Noon Food

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### Description of company structure

Orkla Home and Personal Care and Lilleborg, part of the business area Orkla Care, fully owned by Orkla ASA

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### Turnover in reporting year (NOK)

3 300 000 000

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### Number of employees

1 000

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### Major changes to the company since last reporting period (mergers, acquisitions etc.)

New CEO Stian Lund, from September 2020, for OHPC  
New SC Dir Marcus Larsson, from July 2020, for OHPC  
New CEO Silje Ebbell Tøge, from August 2020, for Lilleborg  
Annemarie Barker, Customer Service & Supply Manager, Lilleborg

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### Contact person for the report (name and title)

Henning André Raab, Purchasing Manager

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### Email for contact person for the report

henning.andre.raab@orkla.no

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## Supply chain information

### General description of the supply chain and the company's sourcing model

OHPC/Lilleborg as, are part of Orkla ASA and we follow the group policies:

- \* Corporate responsibility at Orkla
- \* Anti-corruption
- \* Code of conduct
- \* Supplier Code of Conduct
- \* Orkla Responsible Employer and Human Rights Policy
- \* EHS - a safe workplace for all
- \* Orkla's zero deforestation policy
- \* Orkla Policy for Sustainable Palm Oil
- \* Orkla's Policy on GMOs

Policies etc. to be found; <https://www.orkla.com/sustainability/procedures-and-policies/>

Governing Procedures OHPC:

The governing documents applicable to all Orkla Home & Personal Care/ Lilleborg personnel working with our products.

- \* Management
- \* Contingency & Traceability
- \* Quality
- \* Regulatory & Safety
- \* Innovation
- \* Production
- \* Procurement

Documents owned by Procurement (including Supplier Approval and Management).

- \* SOP Procurement OHPC
- \* FCH Supplier Quality Assurance
- \* FOR Request for Information
- \* FOR Supplier Responsibility Matrix
- \* INS Criteria Supplier Reassessment
- \* FOR Supplier Approval
- \* Code of Conduct

OHPC factory structure:

OHPC have five factories fully owned by Orkla located in Norway (2), Sweden (1), Denmark (1) and Poland (1). Our factories manufacture home and personal care products, and professional cleaning products.

We are purchasing packaging and chemicals mainly from European countries.

Sustainable sourcing, at OHPC/Lilleborg we are committed to using raw materials that are produced with the interests of human beings, animals and the environment in mind. We therefore work closely with our suppliers to develop sustainable value chains and continuously improvements. In our sustainability strategy we have set clear objectives for our work up to 2025, and we have highlighted areas in which our efforts will be important for both society at large and our long-term value creation. Sustainable growth is the new norm for business and industry. As a major Nordic company, we at Orkla/OHPC/Lilleborg have a responsibility for leading the way in our industry. In 2015, Orkla joined other Global Compact companies all over the world in placing the new UN global Sustainable Development Goals on our agenda. For further information we refer to: <https://www.orkla.com/sustainability/>

Approximately NOK 125 million of OHPC/Lilleborg's total spend comes from Asia. Spend from Asia has continued to increase during the past years. In Asian countries we believe in long term contracts. We aim to, and normally have, a running contract with an agreed time period for termination by both parties. In other words we have long term relationship with our suppliers in Asia and aim to build business together. In Asian countries number of major suppliers account to 18 last year. Our work is based on Orkla ASA's directions for social responsible sourcing and we base our work from the supplier code of conduct. There is a management decision

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that we every third year shall perform social responsible audits on all Asian suppliers carried out by externals, i.e. Intertek. New suppliers to OHPC shall be audited by internal resources or external based on our purchasing policies independently if supplier in Asia or elsewhere.

When it comes to Traded Goods suppliers the majority of their sub-suppliers are mapped in sourcing matrix or in buying rules. In our buying rules the sub-suppliers are mapped on order size and lead times. In our agreement with the suppliers we do also state that our suppliers cannot change sub-supplier without written notice to us and they have received our written confirmation in return.

In business meetings we are monitoring our purchase practices and continuously try to collaborate on improving the value chain:

- We continuously work to improve the quality of forecasting and collecting information from sales department, i.e. campaign volumes.
- We support transparency and are willing to share forecasts on i.e 26 weeks horizon.
- In our "buying rules" the lead times for the products components is defined and/or finished goods. This information make the basis in our daily business regarding forecasting and setting lead times in our enterprise system.
- Normally we only use full loaded containers when shipping goods from Asia.
- Sustainable sourcing and continuous improvement are also part of the agenda in our meetings with major suppliers or in separate meetings.

We also try to minimize negative impact or to promote better conditions through i.e:

- Intertek audits (or similar) have been conducted on all new suppliers in the region of Asia. Intertek audits give us a valuable know how of a company and we have decided that we aim for Intertek (or similar companies) to audit all new suppliers in Asia. In running business suppliers in Europe will be evaluated from case to case according to supplier assessment routines.
- We encourage our suppliers to think in new ways to execute or to improve a task or processes and present proposal(s) for OHPC/Lilleborg that can contribute positively to the production and supply chain.
- Annual sourcing review meetings are of great importance.

#### Code of Conduct (CoC)

OHPC/Lilleborg is committed to operating in accordance with responsible, ethical and sound corporate and business principles and in compliance with all applicable laws and public regulations. This requires the collective effort of all employees. Our Code of Conduct applies to all employees and board members. By agreement it may also apply to independent consultants, intermediaries or others acting on behalf of Orkla. The document provides a framework for what Orkla considers to be responsible conduct, and defines the individual responsibilities of employees through a combination of broad principles and specific requirements.

- OHPC/Lilleborg has been a member of IEH since 2005.
- OHPC/Lilleborg started in 2005 using CoC, our CoC was translated to English, from 2010 also to Chinese, and in 2018 also translated to Polish. We have started implement latest version of Orkla version CoC with our suppliers and this work will continue the coming year.

How is the CoC communicated:

- Normally we want to use our own resources to control and follow-up on suppliers because we believe it is valuable to have a close dialogue with our producers of packaging and finished goods.
- OHPC aim to use an external audit company i.e Intertek towards new suppliers and also approximately every third year for existing suppliers. This audit is based on the pillars from the CoC.
- As part of the preselection process potential new suppliers we ask if they are willing to be audited, become a Sedex member and we share our CoC. The CoC they shall ratify. When we have selected the new supplier we ask them to complete the "supplier request for information". If Sedex member the Self assessment document we aim that they download into the system.
- Our visits to suppliers include a revision at the production plant. We also ask an external party to audit the supplier. Revision is completed using check lists and going through received documentation (i.e Sedex self-assessment and previous corrective action plans), plus that auditor on site ask for various kinds of documentation (salary list, working contracts, etc.).
- We visit all factories and explain that our CoC will be part of doing business with us.
- We always have our CoC on our agenda when visiting factories.



- Key elements of the on site ethical audit process include:
- \* Opening meeting with senior management, payroll and HR staff;
- Meetings with Union or other worker representatives;
- Site tour/a physical review of all production areas at your factory;
- A review of factory documentation relating to EHS, administration and HR issues;
- Production worker interviews (confidential interviews lasting approx. 10 minutes each, conducted with production employees from various areas of the production);
- Discussions with HR or personnel management, EHS manager or Factory manager for clarification as needed;
- A closing meeting with senior management to report back findings against the CoC and, if needed, agree upon corrective actions and a timeline.

#### Collaborate

We run frequent supplier meetings with several suppliers both in Europe and Asia. We believe one good way to build competence among our Asian suppliers is to have them follow up actions from the Intertek audits (continuous process). We have experienced that comments from the corrective action reports have given the suppliers awareness of country law or a local law, and in that way we have developed their skills and their knowledge.

"Intertek audits is a great way to get to know your suppliers"

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#### Number of suppliers with which the company had commercial relations in the reporting year

373

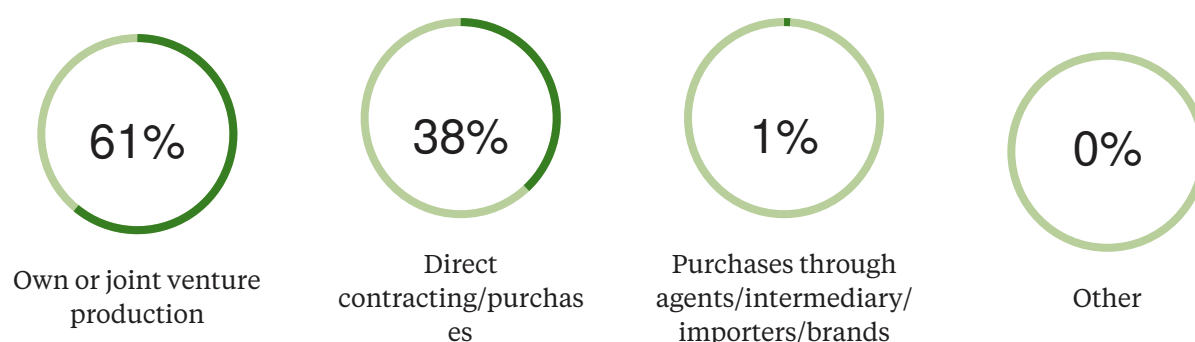
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#### Comments to number of suppliers

Based on 2020 statistics from our SMART system

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#### Approximate ratio by sourcing options



Total 373 suppliers from our SMART system. Own production stands for 62% purchased material. Packaging material stands for 26% and chemicals 36% purchase value into our own factories and 39% for traded goods. There exist suppliers whom supply to several sites.

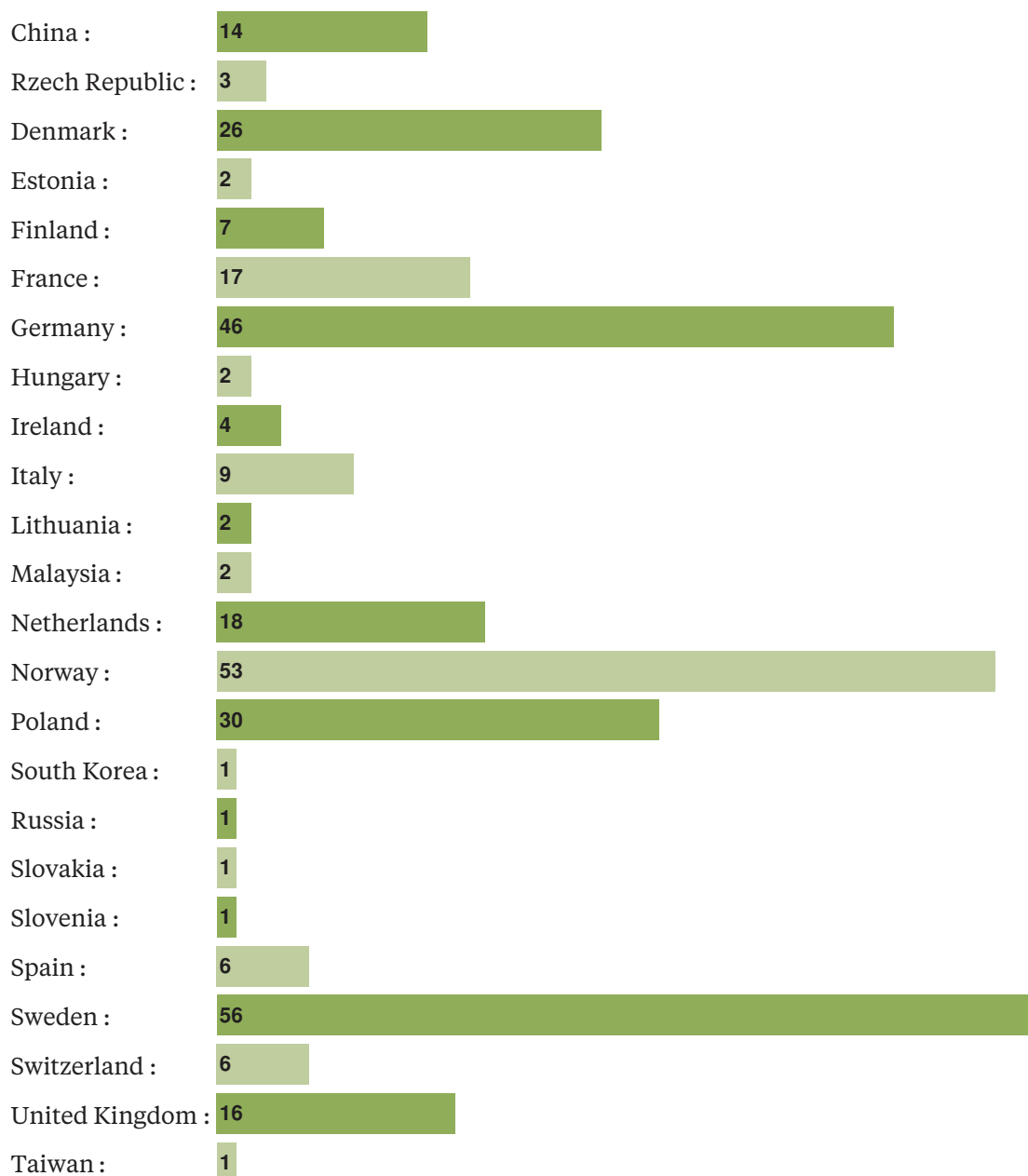
Number of Asian suppliers which are in scope account to 18 inclusive one indirect located in Sweden.

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#### List of first tier suppliers (producers) by country

Austria :	1
Belgium :	2





Number of major suppliers of intermediate goods into our factories and traded goods suppliers.

We use our document "sourcing matrix" and in our contract we have an appendix called "buying rules" where sub suppliers are listed inclusive lead times and MOQ's.

We aim to have an open dialogue with our suppliers, full transparency and have updated buying rules as well sourcing matrix. In the contract we also state that the supplier is not allowed to change sub supplier without written approval. In our specifications we state type of material we have agreed upon. We perform check for hazardous goods etc as part of our routines and requirements on new products/projects.

To identify the suppliers for which we believe the risk of violations of our Code of Conduct is highest, we make sure company resources are prioritized towards these suppliers. We use a three-step process for risk assessment of suppliers. This is well aligned with the thinking of the OECD guidelines on a risk-based approach; we have to focus on where the risk of violations of our Supplier Code of Conduct is highest.

New suppliers we are also audit from a quality, EHS, etc perspective by internal resources.



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**State the number of workers at first tier suppliers (producers) that the company has an overview of and the number of suppliers this overview is based on**

**Number of workers**

9 751

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**Number of suppliers**

31

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**Comments to number of workers**

Figures from SEDEX, accurate number varies over time and does not represent all suppliers.

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**Key inputs/raw materials and associated geographies**

<b>Packaging</b>	Global
<b>Chemical</b>	Global
<b>Traded goods</b>	Global

The majority of our packaging and chemical suppliers origin from EU. Our Traded goods suppliers mainly located in EU. But we also have two larger traded goods suppliers in China and in Malaysia.

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**Is the company a supplier to the public sector?**

Yes



## Goals and progress

### Goals and progress for the reporting year

1

**Goal :** Work towards achieving the Orkla sustainability targets

**Status :** Refer in general to Orkla Sustainability report.  
We have taken several steps in the correct direction during the year, i.e implementing recycled plastic material on several of our products, increased our usage certified palm oil, focus on reducing waste level, etc.

2

**Goal :** Coordinate full-audit performed by Intertek or similar company for all suppliers in Asian

**Status :** Due to Covid19 outbreak this has been limited. However there have been performed several audits executed by Intertek or similar company in the reporting year. This is continuously work and several planned for 2021.

3

**Goal :** Follow up and CAPR and close 50% negative comments from audit (2020/2021 target)

**Status :** We have closed many non compliance comments during the year and our work continues as planned for reaching our targets by the end of 2021.

4

**Goal :** All suppliers in Asia are supposed to participate CSR/AIM forum or conference once a year.

**Status :** Due to Covid19 outbreak world wide this has not taken place in the year 2020. We sincerely hope in the year of 2021 will make it possible to join some programs.

5

**Goal :** Continue work Code of Conduct in place major suppliers world wide

**Status :** We have signed CoC with the major traded goods suppliers, and normally is part of the contract. Our CoC is also part of the contract major packaging suppliers world wide.

6

**Goal :** Make sure all suppliers have updated the membership of SEDEX and self assessment in the reporting year

**Status :** Continues work and major traded goods suppliers are members.

7

**Goal :** Supplier assessment - approve 150 suppliers



**Status :** In the reporting year we have performed supplier assessment approval on 164 suppliers.

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#### Goal for coming years

1

Work towards achieving the Orkla sustainability targets

2

Coordinate full-audit performed by Intertek or similar company for major suppliers in Asia remaining from 2020.

3

Continue to follow up CAPR and close 50% non compliance comments from audit (2020/2021 target)

4

We aim all suppliers in Asia are supposed to participate CSR/AIM forum or conference once a year.

5

Continue work implement updated version of Orkla Code of Conduct major suppliers world wide

6

Supplier assessment - approve remaining number of the major suppliers supplying our factories and traded goods suppliers.





# 1

## Governance and commitment to responsible business conduct

Commitment to sustainability means that the business should have relevant policies and codes of conducts in place, as well as effective management systems for implementing them. Central to this is the company's work with due diligence. This means, among other things, the business need strategies and action plans for how the company identifies and manages its risk of negative impact on people, society and the environment, including through business relationships and in the supply chain. Systematic management of such risks will strengthen the company's contribution to the Sustainable Development Goals. Strong commitment from top-management, and clear division of the responsibility for conducting due diligence is key. Those involved need to know how to proceed. Sustainability should be an integral part of business operations. Essential to this is transparency on the company's commitments, challenges faced and measures undertaken to manage those challenges.



## 1.A Policy commitment

### 1.A.1 What does the company say publicly about its commitment to respect people, society and the environment?

Orkla policy mennesker og samfunn

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### 1.A.2 How is the commitment/policy developed and how is it anchored in the company?

i.e Our code of Conduct was originally developed in cooperation with IEH. During the years it has been further developed several times and also translated into Chinese and Polish. Latest version Code of Conduct was approved by the Board of Directors of Orkla ASA on 4th February 2020.

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## 1.B Organisation and internal communication

### 1.B.1 How is the work with responsible business conduct organised within the company and why in this particular way?

<https://www.orkla.no/baerekraft/samfunnsansvar-i-orkla/samfunnsansvar-i-orkla/>

<https://www.orkla.no/baerekraft/samfunnsansvar-i-orkla/samfunnsansvar-i-orkla/>

Styringsrutiner og overordnede retningslinjer for Orklas virksomhet.

Egen bærekrafts strategi

Vision "local sustainable living made easy"

Medarbeider undersøkelse mm.

Breakfast meetings / seminars

Dedikerte personer

etc

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### 1.B.2 How are employees made aware of the ways in which responsible business conduct should inform their decisions and actions?

Styringsrutiner og overordnede retningslinjer for Orklas virksomhet.

OHPC vision "local sustainable living made easy"

Example through:

Common goals shared in i.e Town halls, department meetings, Orkla reports, Intranet, etc

i.e Part of relevant persons personal goals

Follow up between responsible and their leader

Participate on forums/conferences

Participate on some external auditors audit

Have sustainability on their agenda when meeting suppliers and perform factory tour

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### 1.B.3 How does the company make sure employees have adequate competencies to work towards implementing responsible business conduct?

Beskrivelse av hvordan arbeidet med bærekraftig forretningspraksis er organisert, inkludert rapporteringslinjer.

Besvares under 1.B.1.

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## 1.C. Plans and resources

### **1.C.1 How is the company's commitment to respect people, society and the environment rooted in strategies and action plans?**

Strategi, ambisjon eller overordnede mål for bærekraftsarbeidet. Lenke til årsrapport

Gjennomfører bedriften strategi i handlingsplaner - se forøvrig årsrapporter og andre lenker. [www.orkla.no/com](http://www.orkla.no/com)  
Styringsrutiner og overordnede retningslinjer for Orklas virksomhet.

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### **1.C.2 How is the company's strategies and action plans to work towards being responsible and sustainable followed up in top management and in the board?**

Det er satt strategiske måleparametre på viktige bærekraftsmål som f.eks. overgangen til økt bruk av resirkulert plast og råvarer av fornybart opphav. Det jobbes også med å rapportere inn salgsutviklingen på våre mest bærekraftige produkter. Bærekraftige produkter er definert etter samlede Orkla retningslinjer.

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## 1.D Partnerships and collaboration with business associates, such as suppliers

**1.D.1 How does the company make clear in its business relationships (in particular in the supply chain) the importance it places on responsible business conduct?**

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## 1.E Lessons learned and changes

### 1.E.1 What lessons has the company learned during the reporting period concerning sustainability, and what has changed as a result?

We continuously need to work on these theme because its always changing. i.e

- 1) New employees internally and at supplier side.
- 2) Expectations from end consumers
- 3 Mass balanced or certified palm oil are becoming more common and aviable as market adjust themself on customer requirements,
- 4) High demand and shortage on recycled plastic material. Therefore we need to continue our work to approve new suppliers to secure supply,
- 5) Intertek audit's and follow-up is a great way to get to know your suppliers.
- 6) Law and regulations changing



A man with a slight smile, wearing a white hairnet and a dark blue long-sleeved shirt, is looking towards the camera. He is in a factory or industrial setting, with blurred machinery and structures in the background. The lighting is soft, highlighting his face.

## 2

### Defining the focus for reporting

## Identify and assess the company's impact on people, society and environment

“Identify and assess” is about identifying the company's risk for, and actual negative impact on, people, society and the environment, including in the supply chain and through business relations. As a first step the company should get an overall risk picture, before subsequently prioritising measures where the risk of negative impact is the greatest, i.e. salient issues. How the company is involved in the negative impact is central to determine the right actions to take. Involvement of stakeholders, especially those affected, is central when assessing risks. It is also important to consult with stakeholders when implementing measures to manage the negative impact.



## 2.A Mapping and prioritising

### STATEMENT ON SALIENT ISSUES

*Prioritising one or more risk areas on the basis of severity does not mean that some risks are more important than others, or that the company should not take action on other risks, but that risks with the greatest negative impact are prioritised first. Mapping and prioritisation are a continuous process.*

**2.A.1 In the table below state the salient issues associated with the company's activities and business relationships, particularly in the supply chain and during the reporting period**

Salient issue	Related topic	Geography
<a href="https://www.orkla.no/baerekraft/">https://www.orkla.no/baerekraft/</a> Når det gjelder etisk handel er Asien i fokus		

### DETERMINATION OF SALIENT ISSUES

**2.A.2 Describe how the salient issues were determined, in terms of processes and sources of information, including any input from stakeholders**

[Link til årsrapport](#)

### ADDITIONAL SEVERE IMPACTS

**2.A.3 Identify any severe impacts on people, society and the environment that occurred or were still being addressed during the reporting period, but which fall outside of the salient issues, and explain how they have been addressed.**

[Link til årsrapport](#)



A woman in a blue surgical cap and gown, looking down, in a hospital setting. The background is blurred, showing other people in similar attire and bright overhead lights.

### 3

#### Management of salient issues

## Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings in a way that contributes to a sustainable and responsible business conduct. The most severe negative impact on people, society and the environment should be prioritised first. This does not mean that other risks are less important or that they are not handled. The way the company is involved in the negative impact is central to taking the right action. Negative impact that the company causes or contributes to must cease, and the business must work to prevent and mitigate such risk. To address negative impact directly linked to the company, e.g. in the supply chain, the business must use its leverage to influence the entity causing the adverse impact to cease, prevent or mitigate it. This involves developing and implementing plans and routines to manage risk and may require changes to the company's policy documents and management systems. Effective management of the negative impact on people, society and the environment is a major contribution to the achievement of the SDGs.



### 3. A Cease, prevent or mitigate

3.A.1 For each salient issue in your supply chain, add a goal, status and describe specific actions and progress made in the reporting year

Salient issue	<a href="https://www.orkla.no/baerekraft/">https://www.orkla.no/baerekraft/</a> Når det gjelder etisk handel er Asien i fokus
Goal :	100% resirkulert eller biobasert plastbruk innen 2025 100% RSPO MB palmeolje innen utgangen av 2020
Status :	12% av total plastbruk fra resirkulert opphav. 99,5% RSPO MB i egne fabrikker, 75% fra tredjepart.



**Objectives in reporting year :**

For OHPC er plast en viktig ressurs, men også en ressurs det er knyttet negative klima & miljøeffekter til (økte klimagassutslipp og forsøpling i naturen) Vi jobber derfor aktivt med å gjøre vårt forbruk av plast mer miljøvennlig. Våre fokusområder er overgangen til resirkulerte kilder, kilder av biologisk opphavs og økt fokus på design for gjenvinning. Vi har også fokus på forsøpling og har adoptert en strand for rydding i tillegg til utstrakt dialog med fagmiljøet knyttet til plastforsøpling.

Vi har satt oss som mål å årlig konvertere 10% av all vår plastbruk til resirkulerte eller bio alternativer. Med et utfordrende og underutviklet marked for disse råvarene så er dette svært ambisiøst og vil har ikke lyktes de to siste årene med denne satsingen.

Vi cirka doblet bruken av resirkulert plast (i antall tonn) i 2020 sammenliknet med 2019. Vi har også hatt en salgsutvikling i denne perioden som gjør at totalmengden plas er gått opp:

Andel resirkulert 2020 12%

Andel resirkulert 2019 8%.

100% RSPO MB innen årets utgang. Har kommet til 99,5% på egne fabrikker takket være god innsats og fokus. For tredjepartsprodusenter er resultatet 75%, men de siste 25% kommer alle fra en og samme leverandør som vil få fokus i 2021 slik at vi også her kommer opp til målet på 100%. Forøvrig jobber vi videre med dette temaet gjennom ASD - Action for sustainable derivatives. Der vil vi få enda større transparens i leverandørkjeden og bidra til forbedringer lokalt i opprinnelseslandene.

**Actions :**



## Cross-cutting actions related to management of negative impact:

**Describe cross-cutting actions to cease, prevent or mitigate negative impacts, including in your supply chain**

### **3.B.1 Reduction of environmental and climate footprint**

Status for gjennomførte tiltak for å stanse, forebygge og redusere. [Link til Orkla årsrapport](#)

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### **3.B.2 Adapting own purchasing practices (sourcing)**

Status for gjennomførte tiltak for å stanse, forebygge og redusere. [Link til Orkla årsrapport](#)

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### **3.B.3 Choice of product design and of raw materials**

RSPO MB-sertifiserte råvarer har gått fra 80% i 2018 til 99,5% i 2020 (egne fabrikker).

[Link til Orkla årsrapport](#)

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### **3.B.4 Actively support free trade union organisation and collective bargaining, or where the law does not allow it, actively support other forms of democratically elected worker representation.**

Status for gjennomførte tiltak for å stanse, forebygge og redusere. [Link til Orkla årsrapport](#)

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### **3.B.5 Contribute to development, capacity building and training of suppliers and workers in the supply chain:**

Status for gjennomførte tiltak for å stanse, forebygge og redusere. [Link til Orkla årsrapport](#)

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### **3.B.6 Other plans and measures taken to deal with salient issue**

Status for gjennomførte tiltak for å stanse, forebygge og redusere. [Link til Orkla årsrapport](#)

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## 4

# Track implementation and results

Tracking implementation of actions and results is key to the company's due diligence process. For example, is the identifying and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect real conditions in the supply chain? Do measures aimed at ceasing, preventing and reducing the company's negative impact work as intended? Is negative impact remediated where relevant? This may apply to actions taken by the company alone or carried out in collaboration with others. Companies must have procedures and systems to track their implementation and results in order to assess them. The company's experience with due diligence is used to improve processes and results in the future.



## 4.A Monitoring and assessment

### **4.A.1 Describe responsibilities and procedures within the company for tracking performance with respect to due diligence activities**

[Link til Orkla rapport](#)

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### **4.A.2 Describe how the company evaluates the effect of its own efforts, or those made by suppliers (and other business relations), to identify, prevent and mitigate salient issues**

[Link til Orkla rapport](#)



A woman with dark hair tied back, wearing a light blue button-down shirt and a brown leather apron, is looking down at a large, round, metal tray with several circular indentations. The background is a blurred kitchen or industrial setting.

## 5

# Communicate how impacts are addressed

Relevant external communication on company due diligence for responsible business conduct needs to build on specific activities and results. This include external communication of policies and codes of conduct, or processes and activities related to identifying and managing the company's actual and potential negative impact on people, society and the environment. Communication should also include findings, effects and results of concrete actions or activities.



## 5.A External communication

### 5.A.1 Describe how the company communicates with affected stakeholders when managing its salient issues

ref årsrapport, [www.Orkla.no](http://www.Orkla.no)

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### 5.A.2 Describe how the company communicates publicly about its own work on identifying and management of salient issues

[Link til Orkla rapport](#)

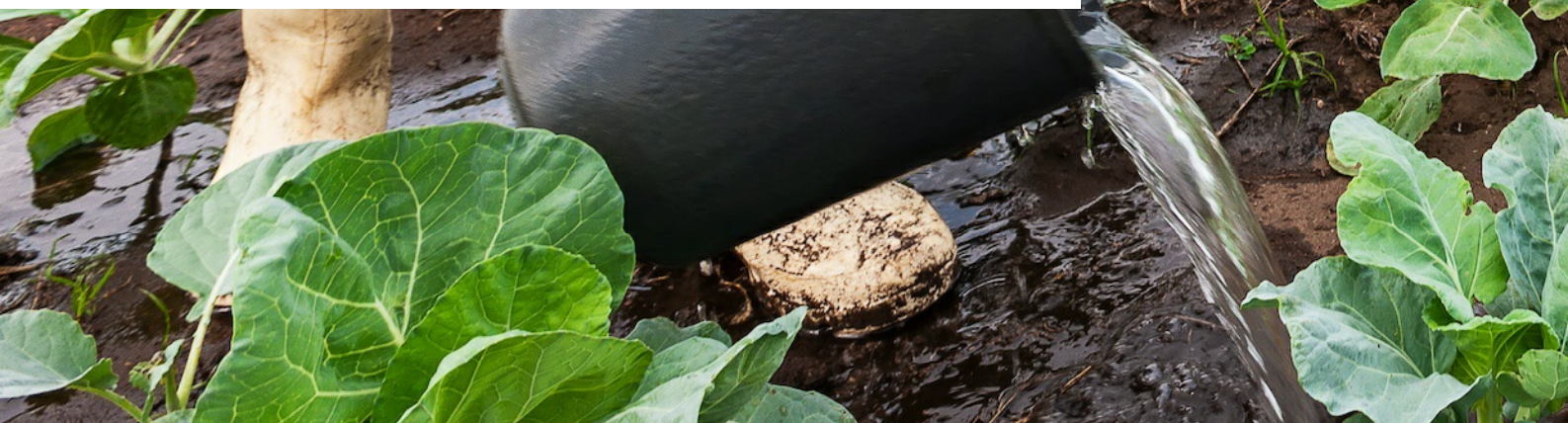




6

## Provide for or cooperate to ensure remediation when appropriate

Once a company has identified that it has caused or contributed to negative impact on people, society or the environment, the company must provide for, or cooperate to ensure remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. When appropriate, companies should provide for or cooperate with legitimate remediation mechanisms through which impacted stakeholders and rights holders can raise complaints.





## 6.A Remediation

### 6.A.1 Describe the company's policy for remediation of negative impacts on people, society and the environment

Vi følger også feks norske retningslinjer.

<https://www.regjeringen.no/no/tema/utenrikssaker/naringslivssamarbeid-i-utlandet/innsikt/aktsomhet/id652493/>

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### 6.A.2 Describe cases of remediation in reporting year, if relevant

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## 6.B Secure access to grievance mechanisms

**6.B.1 Describe what the company does to ensure that workers and communities have access to effective remediation mechanisms, when appropriate:**



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