



Rapport for

# Bærekraftig forretningspraksis 2021

for Nomono AS

**nomono**





## FNs BÆREKRAFTSMÅL



## Til lesere av rapporten

Næringslivet har stor påvirkning på mennesker, samfunn og miljø og kan både bidra positivt til utvikling, men også medvirke negativt og forårsake skade. Virksomheter har derfor også en nøkkelrolle i å oppnå FNs bærekraftsmål. Alle selskaper, uavhengig av størrelse, er av norske myndigheter forventet å kartlegge, forebygge, begrense og gjøre rede for hvordan de håndterer risiko for negativ påvirkning samt rette opp skade for mennesker, samfunn og miljø – såkalte aktsomhetsvurderinger (due diligence). Dette gjelder både næringsliv, offentlig sektor og organisasjoner. Større virksomheter er fra og med 1.juli 2022, gjennom åpenhetsloven, lovpålagt å utføre dette arbeidet og vise åpenhet om det ved å rapportere offentlig om arbeidet.

Medlemmer i Etisk handel Norge har forpliktet seg til å jobbe med aktsomhetsvurderinger for bærekraftig forretningspraksis. Til grunn for dette arbeidet ligger Etisk handel Norges prinsipper (vår code of conduct), som dekker områdene anstendig arbeid, menneskerettigheter, miljø/klima, antikorrupsjon og dyrevelferd.

Malen for medlemsrapporten er utformet for at virksomheten skal vise åpenhet om sitt arbeid med ansvarlig næringsliv og bærekraftig forretningspraksis, som beskrevet i FNs veiledende prinsipper for næringsliv og menneskerettigheter og OECDs retningslinjer for flernasjonale selskaper. I rapporteringen skal det inngå hvordan virksomheten arbeider med aktsomhetsvurderinger og beskrive hvilke utfordringer virksomheten står overfor, hvilke tiltak som gjennomføres for å håndtere utfordringene samt fremdrift og resultater. Alle medlemsrapportene gjøres offentlig tilgjengelig på Etisk handel Norges hjemmesider.

**Heidi Furustøl**

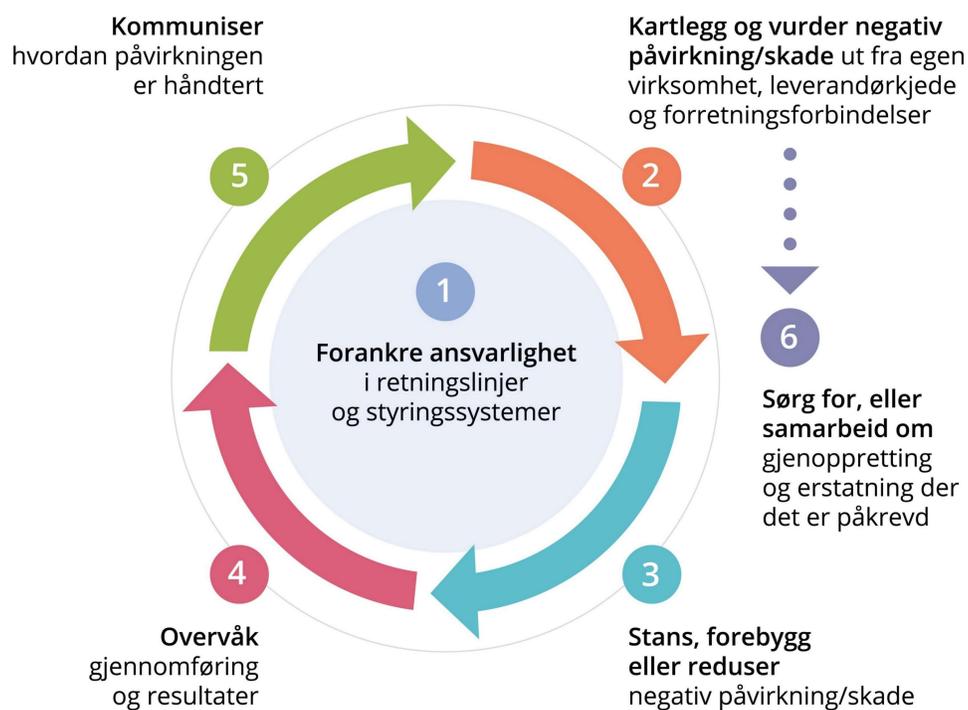
*Daglig leder*

Etisk handel Norge

# Aktsomhetsvurderinger

Denne rapporten er bygget rundt FNs veiledende prinsipper for næringsliv og menneskerettigheter og OECDs modell for aktsomhetsvurderinger for ansvarlig næringsliv.

Modellen har seks trinn som beskriver hvordan virksomheter kan jobbe for mer ansvarlig og bærekraftig forretningspraksis. Å være god på aktsomhetsvurderinger betyr ikke at en virksomhet ikke har negativ påvirkning på mennesker, samfunn og miljø, men heller at virksomheten er åpen og ærlig om utfordringer og håndterer dette på best mulig måte i samråd med sine interessenter. Denne rapporten er delt inn i kapitler basert på denne modellen.



# Forord av daglig leder

Nomono is a user-centric start-up that enables storytellers to be creative by freeing them from the complexity of audio production. We build technology that fades into the background and feels invisible, to make audio storytelling a human experience, not a technical challenge. Our products are exclusive and meant to last. This way we aim to reshape the way we think about consumer electronics and diverge from the throwaway mentality and build emotional durability instead. In this work, we aim to be honest, direct, and transparent, and with the UN Sustainable Development Goals as our North Star, we have put sustainability at the very core of how we think about everything we do, both for ourselves and with our partners and stakeholders.

We recognize that we produce integrated electronics that are known to have challenges related to the sustainability of materials sourcing, production, and end-of-life (e-waste). We work at every step of the way to minimize impact. But just as important is the direct intent of Nomono's solution, namely, to simplify processes for our users that today require many more pieces of equipment and electronic components. One of Nomono's aims is to reduce total electronics consumption by eliminating the need for many of the cables, recorders, and other hardware components that a production crew must have with them today. And as the target customers will be using the Nomono hardware in the field, the costs and environmental impact associated with the transport of equipment will be lower than today's standard.

Nomono also sees great importance in future-proofing the way we work with tech. Our goal is to build a deeper connection between user and product. We want the users to feel that they get value out of taking care of their product and choosing repair options over replacing the entire product.

We firmly believe that sustainability and responsible business conduct must be at the heart of everything and that it will provide a shared value for both our business and for society; it is the driving factor in all product development - from design to supply chain and from digital to physical product. Our goal is also to strengthen local production in Norway and the Nordics in general. We aim to change the way supply chains in consumer electronics work, to bring us into a more transparent era.

**" Our products are exclusive and meant to last. This way we aim to reshape the way we think about consumer electronics and diverge from the throwaway mentality and build emotional durability instead. "**



Jonas Rinde  
*CEO*

# Nøkkelinformasjon om bedriften og leverandørkjeden

## Nøkkelinformasjon om bedriften

### Navn på bedriften

Nomono AS

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### Adresse hovedkontor

Strandveien 43, Trondheim

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### Viktigste merker, produkter og tjenester

Audio Equipment and Software

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### Beskrivelse av bedriftens struktur

We're organized by functional specialties: Product, Revenue, Finance, and Operations. Functions are the family that each specialist has, helping to keep best practices and standards in place across a discipline. A manager heads each function to coach and guide us towards our vision. From these functions, we form cross-functional teams to collaborate on products. Through Sustainability by Design, we have put sustainability at the very core of everything, from how we drive innovation, evaluate risks, and assess growth opportunities. Hence, our due diligence for responsible business conduct is anchored on all levels (management and R&D) and across all product teams.

Nomono's internal culture also encourages collaboration with others who share our passion and build on our ideas but challenge our thinking. A truly sustainable organization cannot be shaped alone, but our sustainability strategy is based on building closer stakeholder relationships. We bring together our capabilities across the company to develop and boost stakeholder alignment and ensure stakeholder-centric decision-making.

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### Omsetning i rapporteringsåret (NOK)

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### Antall ansatte

35

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### Vesentlige organisatoriske endringer siden forrige rapportering

N/A

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### Navn, tittel for kontaktperson for rapporten

Torun Larsen, Supply Chain

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**E-post adresse for kontaktperson for rapporten**

torun.larsen@nomono.co

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## Informasjon om leverandørkjeden

### Generell beskrivelse av bedriftens innkjøpsmodell og leverandørkjede

Nomono is a young company and is now in the prototype stage for both Hardware and software. For the supply chain hardware process, there will be a difference between the plans for 2021/2022 (prototype) and the ones for mass production in 2023.

Key raw materials and direct materials are mainly sourced from Asia at the prototype stage but will mainly be from Europe when we start mass production.

Hardware products are produced and developed in Norway. Electronics printed in Norway - Electronics, and mechanics are assembled into a finished product at our Contractor Manufacturer (CM) in Norway. For reporting years, subcontractors for electronic components and mechanics are mainly from Asia. When it comes to volume production, some of the mechanics and electronics will be moved to Europe. Components for electronics will come from Asia but will be assembled into finished electronics cards here in Norway. The product will have Norwegian origin.

The Supply Chain process of servers and software are managed by Nomono Senior iOS Developer for 2021 and 2022.

For internal purchases of office equipment etc, we have a guide that informs the employees where to buy office equipment from. As of today, this is a form available for everyone - New employees are informed about this under the Nomono Sustainability group onboarding process.

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### Antall leverandører som bedriften har hatt kommersielle relasjoner med i rapporteringsåret

11

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### Kommentar til antall leverandører

Direct contact and Commercial relations i Supply Chain Prototype Process.

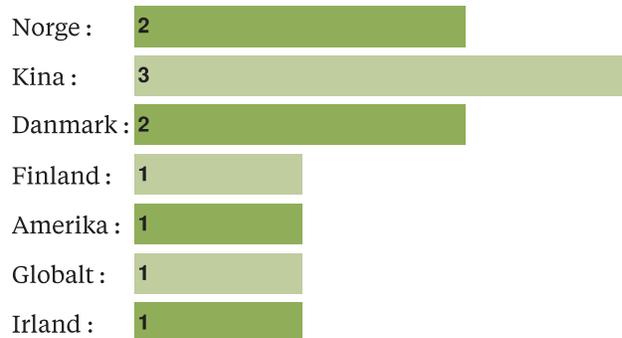
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### Type innkjøp/ leverandørforhold



Above are approximate figures.

#### Liste over førsteleddsprodusenter per land



Above are approximate figures for reporting the year 2021

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**Oppgi antall arbeidere hos førsteleddsprodusenter som bedriften har oversikt over, og hvor mange produsenter dette er basert på.**

#### Antall arbeidere

10 000

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#### Antall produsenter dette er basert på

11

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#### Antall arbeidere per produsent (kalkulert snitt)

910

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#### Kommentar til antall arbeidere

Contract Manufacturer (CM) and third-party manufacturer of components and/or products - Some of our manufacturer have more than one factory.

### Viktigste innsatsfaktorer/råvarer og geografi

<b>Electronics</b>	Kina Norge Den europeiske union
<b>Plastic</b>	Kina
<b>Display</b>	USA
<b>Cables</b>	Kina
<b>Batterieies</b>	Kina Norge
<b>Packaging</b>	Norge Sverige
<b>Pouch</b>	Kina
<b>Magnets</b>	Finland
<b>Display Glass</b>	Danmark
<b>Mesh</b>	Finland
<b>Server energi</b>	Irland

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Er virksomheten leverandør til offentlig sektor?

Nei

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## Mål og fremdrift

### MÅL OG FREMDRIFT I RAPPORTERINGSÅRET

1

**Mål:** 1) 100% renewable energy for all of Nomono's servers.

**Status:** Amazon energy servers - They have 65% renewable as per 2021/2022, and a goal of 100% for their cloud services by 2025

2

**Mål:** 2) Implement focus and awareness culture of Sustainability goals. When employees buy something on behalf of Nomono, think through our environmental role globally and as Nomono representative employee together with the UN's sustainability goals.

**Status:** 80% see action plan

3

**Mål:** 3) Separate Onboarding session new employees to inform about company policy of sustainability

**Status:** 100% - complete

4

**Mål:** 4) Design for disassembly applied on physical products.

**Status:** 100% applied minimum use of glue for physical product. Batteries are replaceable.

5

**Mål:** 5) Packaging from recycled sources and without the use of plastic

**Status:** 50% - in progress with hindrances of reaching 100% due to low volume

6

**Mål:** 6) The design principles for our brand reflect the ambitions in our sustainability strategy.

**Status:** 50% - in progress with finishing date this year before launch

## MÅL FOR KOMMENDE ÅR

1

Produce larger volumes so that it becomes cheaper to use recycled material from raw material suppliers.  
Packaging from recycled sources and without the use of plastic

2

Follow up requirements for subcontractors on the working environment

3

Continue having all new employees participate in the onboarding session from the sustainability group

4

100% product information including materials/manufacturing available on product.

5

Complete the e-learning program for Nomono Sustainability Group by 2024

6

Further work on guidelines for design for disassembly.

7

The responsibility to follow Nomono's guidelines on sustainability is a part of every new employee's contract by 2024.

8

Hire an expert on sustainability in tech companies.

9

We have rooted responsible business conduct in our company structure, culture, and brand.



# 1

## Forankring av bærekraft i virksomheten

Forankring av ansvarlighet knyttet til bærekraftig forretningspraksis i virksomheten handler om å ha strategier, planer, relevante policyer\* og retningslinjer for aktsomhetsvurderinger som er vedtatt av ledelsen. Disse bør omfatte hele virksomheten, samt virksomhetens leverandørkjede og forretningsforbindelser. Effektive styringssystemer for implementering er en forutsetning for å lykkes, og arbeidet med aktsomhetsvurderinger bør være en integrert del av virksomhetens forretningsdrift. Tydelige forventninger fra toppledelsen, samt tydelig plassering av ansvar innad i virksomheten for implementering av de ulike delene av aktsomhetsvurderinger er viktig. Alle involverte må vite hva de skal gjøre. Åpenhet om forpliktelser virksomheten har til seg selv, utfordringer de står overfor og hvordan dette håndteres, er vesentlig.



## 1.A Policy\* for egen virksomhet

### 1.A.1 Lenke til offentlig tilgjengelig policy for egen virksomhet

<https://nomono.co/policy-for-responsible-business-conduct>

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### 1.A.2 Hva sier bedriften offentlig om sine forpliktelser til å respektere mennesker, samfunn og miljø?

At Nomono, we value respect for another, whether at our Trondheim office in Norway or any of our suppliers. Our goal is to go away from the general acceptance of the status quo and instead start to question every step of the way that potentially creates harm/suffering to people, animals, and the environment. Consequently, we aim to assess as many stops of our supply chain as possible and to use our position as an existing or a possible customer in favor of the ones potentially at risk. However, we are aware that we are a pre-revenue start-up with limited ability to impact the underlying problems with the supply of raw materials and the connected labor.

We set high standards for our products and have passionate employees who go the extra mile to secure better products for a better future. We want to be proud of our products and our company, and we want to be able to be transparent without feeling bad about what we are sharing.

Our ambition is to learn as much as possible from others to later share our knowledge with those who are in the same situation as we were when we started. We aim to combine these learnings with our thoughts and Nomono's foundational company values. To summarize, we want our policies and guidelines to not only inform but inspire people.

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### 1.A.3 Hvordan er policy for egen virksomhet blitt utviklet og forankret?

Nomono has made sure to involve representatives from all areas within the company, to develop the policies and guidelines for responsible business conduct. We aim to create a business strategy that includes these guiding principles at all stages of the R&D process - from early research and concept design, over mechanical and software engineering all the way to supply chain and follow up for our customers.

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## 1.B Organisering og internkommunikasjon

### 1.B.1 Hvordan er arbeidet med aktsomhetsvurderinger organisert i bedriften, og hvorfor?

Our COO, Kristine Snyder (Management/People & Culture), is responsible from management's side and one of our Industrial Designers, Karoline Müller (Design), is leading the Sustainability Committee at Nomono. Apart from Kristine and Karoline, this committee is consisting of three other members:

1. Torun Larsen, Supply Chain Manager (Supply Chain). Torun works with all our suppliers and has oversight over our entire supply chain.
2. Øyvind Grimnes, Senior Software Engineer (Software & Services). Øyvind makes sure our digital products live up to the same standards as our physical ones, his focus is on servers and server energy used during the operation of our digital products.
3. Osmund Bøe, Senior Mechanical Engineer (Hardware). Just like Torun, Osmund also works very closely with our suppliers. He establishes preventive engineering and design methods, like Design for Disassembly, early on in the development process.

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### 1.B.2 Hvordan blir betydningen av virksomhetens aktsomhetsvurderinger konkretisert og tydeliggjort for de ansatte gjennom stillingsbeskrivelse, arbeidsoppgaver og incentivordninger?

Nomono has a stated and deliberate focus on sustainable business practice, as described by our CEO in his introduction. We invite all employees to participate in our employee share ownership program, and by becoming owners the employees' incentives align with the company's objectives, also in the area of sustainability. Further, our performance management process is informal in nature, and we encourage continuous and open feedback in our teams. In these conversations, sustainable business practices are a regular topic for discussion. In this way sustainability is kept top of mind in decision making and in expectation setting with our employees.

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### 1.B.3 Hvordan sikres det at relevante ansatte har tilstrekkelig kompetanse til å gjennomføre arbeidet med aktsomhetsvurderinger?

At Nomono we want to include responsible business conduct in the workflow of every employee. Every new employee starts with one session on responsible business conduct during their onboarding program. These sessions contain everything from how we handle internal purchases for and/or by employees, to an overview of our R&D process and how it is rooted in our guidelines for responsible business conduct. We follow up the work on the due diligence for responsible business conduct during our monthly company-wide meeting. Here, the sustainability committee addresses relevant updates on how the work with this topic is progressing, shares updates on guidelines, and invites other employees to discuss/give feedback on those guidelines. Within the sustainability committee, members take part in Ethical Trade Norway's internal courses to better their knowledge on responsible business conduct.

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## 1.C. Planer og ressurser

### **1.C.1 Hvordan er virksomhetens forpliktelser til å respektere mennesker, samfunn og miljø forankret i virksomhetens strategier og handlingsplaner?**

We try to define clear goals together with relevant stakeholders based on the experience from our day-to-day work at Nomono. Our goal is to always go the extra mile to find real solutions to real problems while being open about the ones we haven't solved yet. While our efforts in this don't have one specific budget, all teams at Nomono have their own budgets and it is highly encouraged to use it to take the necessary steps towards responsible business conduct.

Our policies are available publicly on our homepage and our aim for 2022 is to create an easy-to-understand, illustrated version of our sustainability strategy. This will then also be available on our homepage and social media.

Examples of how we want to work with the action plan further are to closely follow up internal meetings every quarter where we actively review information with the respective involved. Example apply for certifications for packaging will be one action.

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### **1.C.2 Hvordan følges virksomhetens strategier og planer for å være ansvarlig og bærekraftig opp av ledelse og styre?**

All policies and policy changes need to be passed by senior management and the board, while action plans are created in line with the policies by the product teams and the sustainability committee. Nomono's management also works on providing and relocating resources.

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## 1.D Partnerskap og samarbeid med forretningsforbindelser, spesielt leverandører

### 1.D.1 Hvordan tydeliggjør virksomheten viktigheten av ansvarlighet og bærekraft i møte med forretningspartnere, spesielt i leverandørkjeden?

Link to publicly available guidelines for suppliers: <https://nomono.co/guidelines-for-suppliers>

We require that our suppliers comply with the Nomono Supplier's Code of Conduct and implement accordingly measures in own supply chains.

Nomono strives to get all suppliers to sign ethical guidelines. The suppliers' traceability in the chain in relation to subcontractors - we encourage our subcontractors to take the questions further - and down the chain. Nomono will request management systems and certifications.

Nomono routines for communication of expectations are divided into two groups.

1) Directly from our supplier (CM) who has routines for suppliers. They visit regularly where possible - and where it is not possible, they will submit their own approval form for signing the supplier.

2) Third-party agreement signed between Nomono and subcontractor - these agreements take care of all points as far as possible regarding regulations and working environment.

We strive to get all subcontractors to sign our Nomono Code of Conduct. For some subcontractors in some countries, this can be challenging. In these cases, we request their document to start the process from the subcontractor's point of view. In this way, we want to put pressure and expectations on what we demand as a company and manufacturer.

Nomono as a company, we want to clarify the importance of accountability and sustainability in our supplier contracts, which include the company's ethical guidelines, guidelines for suppliers, domestic worker policy, migrant worker policy (incl. guidelines for the use of staffing agencies), animal welfare policy, responsible materials, and fiber policy m.m. Our suppliers are responsible for disseminating and following up compliance with these policies further down the value chain.

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## Indikator

### Andel av bedriftens leverandører som har akseptert retningslinjer for leverandører



Above are approximate figures.

## 1.E Erfaringer og endringer

### **1.E.1 Hvilke erfaringer har virksomheten gjort seg om arbeidet med bærekraftig forretningspraksis i rapporteringsåret, og hva har endret seg som et resultat av dette?**

We believe that our power as a start-up lies in being a good example of how much can be done in the consumer electronics sector, even without having any revenue yet. During our work with responsible business conduct, we have realized that real change does not happen in isolation. With this in mind, we have learned that transparency and collaboration, with anyone from suppliers to our competition, are the key to ethical and sustainable success.

One very important lesson we have learned during the reporting period is that responsible business conduct should not be an afterthought. Rather, it should be guiding the entire research and development process. Moreover, we do see the need for long-term plans. Especially for a small company like us, we realize that we can't do everything at once - it is neither feasible from a production/supply chain point of view nor from a financial/business point of view. In other words, we need and want to survive to make an impact.



## 2

Fastsette fokus for rapporten

# Kartlegging av virksomhetens påvirkning på mennesker, samfunn og miljø

Kartlegging handler om å identifisere virksomhetens risiko for, og faktiske negative påvirkning eller skade på mennesker, samfunn og miljø, inkludert i leverandørkjeden og gjennom forretningsforbindelser. Det handler om å først danne seg et overordnet risikobilde, for så å prioritere mest vesentlige risikoområder for grundigere kartlegging og håndtering av funn. Hvordan virksomheten er involvert i eventuell negativ påvirkning på mennesker, samfunn og miljø, er sentralt for å avgjøre riktig respons og tiltak. Involvering av interessenter, spesielt påvirkede parter, er sentralt i kartleggingsarbeidet, så vel som i tiltak for å håndtere utfordringene på en god måte.

## 2.A Kartlegging og prioritering

### PRIORITERT NEGATIV PÅVIRKNING/SKADE FOR MENNESKER, SAMFUNN OG MILJØ

*Å prioritere en eller flere risikoområder på bakgrunn av alvorlighetsgrad, betyr ikke at noen risiko er viktigere enn andre, eller at virksomheter ikke gjør noen med annen risiko, men at det som har størst negativ påvirkning prioriteres først. Kartlegging og prioritering er en kontinuerlig prosess.*

#### 2.A.1 List opp virksomhetens prioriterte risiko for negativ påvirkning/skade på mennesker, samfunn og miljø.

Prioritert negativ påvirkning / skade	Relatert tema	Geografi
Due to our low volumes in 2022 and 2023 we will have little power to influence our suppliers' practices and choose the suppliers with the least negative impact.	Fagorganisering og kollektive forhandlinger Brutal behandling Lønn Arbeidstid Miljø	Globalt
We source some parts from the US and China, where unionizing options are limited or restricted.	Fagorganisering og kollektive forhandlinger Brutal behandling Lønn Arbeidstid	Kina Nordlige Amerika
Issues with transparency of the supply chain of our suppliers in China.	Miljø Materialbruk	Kina
The origin of raw materials (ex. cobalt) for electronics is not possible for us to control at the time being.	Fagorganisering og kollektive forhandlinger Barnarbeid Brutal behandling Lønn Arbeidstid Materialbruk	

The follow up will be to set alerts in our PLM system - as well as have quarterly meetings in the Supply Chain and in the Sustainability group. This will be the way we systematize how we follow up.

## BEGRUNNELSE FOR HVORFOR DISSE UTFORDRINGENE ER PRIORITERT SOM MEST VESENTLIGE FOR MENNESKER, SAMFUNN OG MILJØ

**2.A.2 Beskriv kort virksomhetens rutiner for kartlegging og identifisering av risiko og vis til hvordan den negative påvirkningen/skaden ble identifisert og prioritert i denne perioden. Beskriv hvordan informasjon ble hentet inn, hvilke kilder som er benyttet og hvilke interessenter som er involvert/dere har snakket med. Beskriv videre også om det er identifisert områder eller tema hvor det er manglende informasjon for å danne seg et helhetlig bilde, og hvordan dere planlegger å gå frem for å få mer informasjon/håndtere dette.**

In our first phase (Base Level), we have focused on risk in production countries in relation to transparency, trade unions, human health, the environment, and corruption. We have also adapted to the work with this so that we can take into account the type of product / raw material and the type of production etc. Since we do not have a product in production yet, we do not have the ability to get all the information from suppliers but we aim to build the relationships with suppliers further as we go up in volume.

In 2022 and 2023, we will have a high focus on further work with mapping concerning volume so that it will be easier for us as a company to achieve the goals we have set ourselves.

Nomono routines for mapping and identifying risk will happen in two steps. First, through our "Outline for Signing with Suppliers" and then, through separate fields in our PLM system - so that we assess all components, parts and suppliers at line level from the time we start developing a product until it is completed. Please see the attachment 'Nomono - Kartlegging leverandører'. Sources used are certifications - such as SA8000, WRAP, ISO and International sources such as Difi, CSR risk check tool, Media and web search, country risk, Chamber of Commerce, Export handbook,

Information from the different suppliers is collected from audits done by our CM and ourselves through the Self-Assessment Program and video meetings and written contact with the suppliers.

Routine for mapping will be to create tasks in our PLM system which means that we are forced to approve the supplier to approve a design and a product before a new product or supplier goes into purchase and production

There are some simple reasons why we have not included some things - the reason is that we are in the early stages of company structure and new products. It is an idea that we should have full focus on Sustainability both on people and product - Since we have only existed for three years and are few people and do not yet have a product, it can be difficult to write about this in detail. We want to prove that we have a thorough and good plan for practicing culture, ethics, and sustainability in the years in front of us.

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## ANNEN NEGATIV PÅVIRKNING/SKADE

**2.A.3 Beskriv annen negativ påvirkning/skade på mennesker, samfunn og miljø som ble identifisert i kartleggingen i egen virksomhet, leverandørkjeden eller hos forretningsforbindelser i rapporteringsåret og hvordan disse er håndtert.**

We are still a small start-up so for the time being, we have not been able to visit all factories and suppliers. To prevent us from ending up with a supplier who does not follow our general policies, we have decided to not sign with any supplier who hasn't been visited by any of our trusted local contacts.

The recurring follow-up is to set alerts in our PLM system - as well as have quarterly meetings in the Supply Chain and in the Sustainability group. This will be the way we systematize how we follow up.

A woman in a blue surgical cap and gown is shown in profile, looking down at her work in a hospital operating room. The background is blurred, showing other staff in similar attire and the sterile environment of the room.

### 3

#### Håndtering av prioritert påvirkning

## Stanse, forebygge eller redusere negativ påvirkning

Stanse, forebygge eller redusere handler om å håndtere funn fra kartleggingen på en god måte. Virksomhetens mest vesentlige negative påvirkning på mennesker, samfunn og miljø prioriteres først. Dette betyr ikke at annen risiko er uvesentlig eller at det ikke håndteres. Hvordan virksomheten er involvert, er sentralt for å treffe riktige tiltak. Faktisk negativ påvirkning/skade som virksomheten forårsaker eller bidrar til må stanses, forebygges og reduseres. Virksomheter som er direkte forbundet med negativ påvirkning må bruke sin innflytelse til å få forretningsforbindelser (f.eks. leverandører) til å stanse, forebygge og redusere dette. Dette innebærer å utvikle og iverksettes planer og rutiner for å håndtere risiko, og kan kreve endringer i egne policyer og styringssystemer. Virksomheters vellykkede håndtering av negativ påvirkning på mennesker, samfunn og miljø er et avgjørende bidrag til FNs bærekraftsmål.

### 3.A Stanse, forebygge eller redusere

3.A.1 Legg til mål, status på fremdrift, og beskriv tiltak dere har iverksatt for å håndtere virksomhetens prioriterte negative påvirkning/skade på mennesker, samfunn og miljø

Prioritert negativ påvirkning/skade	<b>Due to our low volumes in 2022 and 2023 we will have little power to influence our suppliers' practices and choose the suppliers with the least negative impact.</b>
Overordnet mål :	Increase volume.
Status :	Since we're still in the prototyping stage, we're not yet able to fulfill this goal.
Mål i rapporteringsåret :	Find ways of increasing our influence on our supply chain.

Utforte tiltak og begrunnelse :

- Negotiate long-term contracts with higher MOQ
- Connect with our startups in similar situations to co-order standard parts or organize in other ways

Prioritert negativ påvirkning/skade	<b>We source some parts from the US and China, where unionizing options are limited or restricted.</b>
Overordnet mål :	Move more of our production to Norway and Scandinavian countries in general.
Status :	Since we're still in the prototyping stage, we still produce in China/ the US.
Mål i rapporteringsåret :	Create a plan of how to transfer the production of parts to Norway and the Scandinavian countries. Assess and influence working conditions and environmental effects of our suppliers abroad.

Utforte tiltak og begrunnelse :

- Start the process of outlining a grievance system for workers in countries where they don't have access to unions.
- Find credible sources and, where possible, visit factories and suppliers.

<p>Prioritert negativ påvirkning/skade</p>	<p><b>Issues with transparency of the supply chain of our suppliers in China.</b></p>
<p>Overordnet mål :</p>	<p>Move more of our production to Norway and Scandinavian countries in general.</p>
<p>Status :</p>	<p>Since we're still in the prototyping stage, we still produce in China/ the US.</p>
<p>Mål i rapporteringsåret :</p>	<p>Create a plan of how to transfer the production of parts to Norway and the Scandinavian countries. Assess and influence working conditions and environmental effects of our suppliers abroad.</p>

Utforte tiltak og begrunnelse :

-Inform and involve and ask for sub-supplier agreement signature - collaboration agreement signature.

Prioritert negativ påvirkning/skade	<b>The origin of raw materials (ex. cobalt) for electronics is not possible for us to control at the time being.</b>
Overordnet mål :	Put pressure on our suppliers to mine/excavate/source ethically sourced raw materials.
Status :	Not started yet.
Mål i rapporteringsåret :	Assess and influence working conditions and environmental effects of our suppliers abroad.

Utforte tiltak og begrunnelse :

- Ask for more transparency in the sourcing process of our suppliers
- Plan out how to reduce the use of "black-box" materials (or how to include them in a closed circle) for future products

## Tverrgående tiltak for å håndtere negativ påvirkning/skade:

Beskriv virksomhetens tverrgående tiltak for å stanse, forebygge eller redusere negativ påvirkning/ skade på mennesker, samfunn og miljø i leverandørkjeden

### 3.B.1 Reduksjon av miljø- og klimafotavtrykk

- Trusted local contacts instead of traveling all over the world
- Trying to use the train when possible (instead of by airplane)
- Not shipping air in the packaging
- Maintain 100% of server energy is coming from renewable sources
- Actively designing for disassembly and minimal carbon footprint

### 3.B.2 Tilpasning av egen innkjøpspraksis (sourcing)

- Working out contracts, deliverables, costs, and deadlines before signing a contract to prevent unpredicted/sudden pressure on suppliers. This means long-term forecasts to avoid quick decisions and late purchases to avoid last-minute decisions.
- Internal guidelines for where to buy supplies for offices, to prevent indirect/unknown support of negative impact. See attached print from our internal Confluence page - Routines for buying stuff.

### 3.B.3 Valg av produkter og sertifiseringer

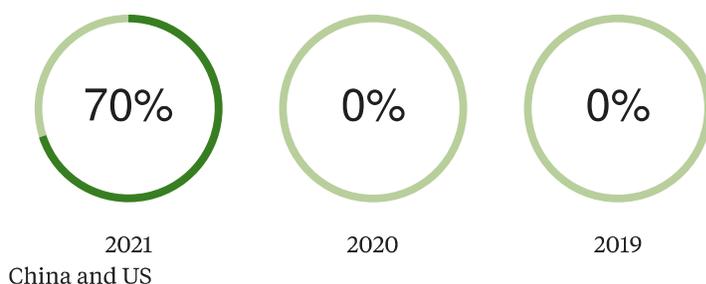
- We are designing with materials' lifetime and robustness in mind
- Working on changing the raw material to fully recycled

### 3.B.4 Støtte aktivt opp om fri fagorganisering og kollektive forhandlinger, eller der lovverket ikke tillater dette, støtte aktivt opp om andre former for demokratisk valgt arbeiderrepresentasjon

- Our guidelines for suppliers call for creating a workplace with unionizing possibilities
- We are encouraging all our employees to unionize at Nomono

## Indikator

Andel leverandører i land med begrensninger i fri fagorganisering eller kollektive forhandlinger



### 3.B.5 Bidrag til utvikling, kompetanseheving og opplæring internt og av leverandører og arbeidere i leverandørkjeden

- We have yet to map out the need for training of suppliers and workers in the supply chain
- Meeting with all Suppliers to go through Guidelines for suppliers.

- We have started to train the entire company, and the sustainability committee in particular, in responsible business conduct
  - Attended Ethical Trade's workshops
- 

**3.B.6 Annen relevant informasjon for hvordan dere arbeider med å redusere, forhindre og håndtere negativ innvirkning på mennesker, samfunn og miljø.**

Currently, our outline for signing with new suppliers is very focused on corruption and people and focuses less on the planet and animals. We are planning to add to this document, focusing more on those factors.



## 4

### Overvåking av gjennomføring og resultater

Overvåking av gjennomføring og resultater handler om å måle effekten av systematikken og eget arbeid i hvert trinn i aktsomhetsvurderingene, og viser hvorvidt virksomheten gjør gode aktsomhetsvurderinger. Virksomheten må ha systematikk og rutiner på plass for å kunne fange opp og kritisk vurdere egne konklusjoner, prioriteringer og tiltak som er gjort som en del av aktsomhetsvurderinger. Eksempelvis: Er kartlegging og prioritering av mest negativ påvirkning gjort på en faglig god og troverdig måte, og som reflekterer de faktiske forholdene? Virker tiltakene for å stanse, forebygge og/eller redusere virksomhetens negative påvirkning/skade etter hensikten? Er skade gjenopprettet der det er relevant? Dette kan gjelde tiltak virksomheten gjør selv og som utføres av eller i samarbeid med andre. Erfaringene virksomheten gjør seg med arbeidet med aktsomhetsvurderinger brukes for å forbedre prosesser og resultater i fremtiden.



## 4.A Overvåkning og evaluering

### **4.A.1 Beskriv hvem som har ansvar for å overvåke effekten av tiltak iverksatt for å håndtere virksomhetens vesentlige risiko for skade/negativ påvirkning på mennesker, samfunn og miljø, og hvordan overvåkingen gjennomføres i praksis**

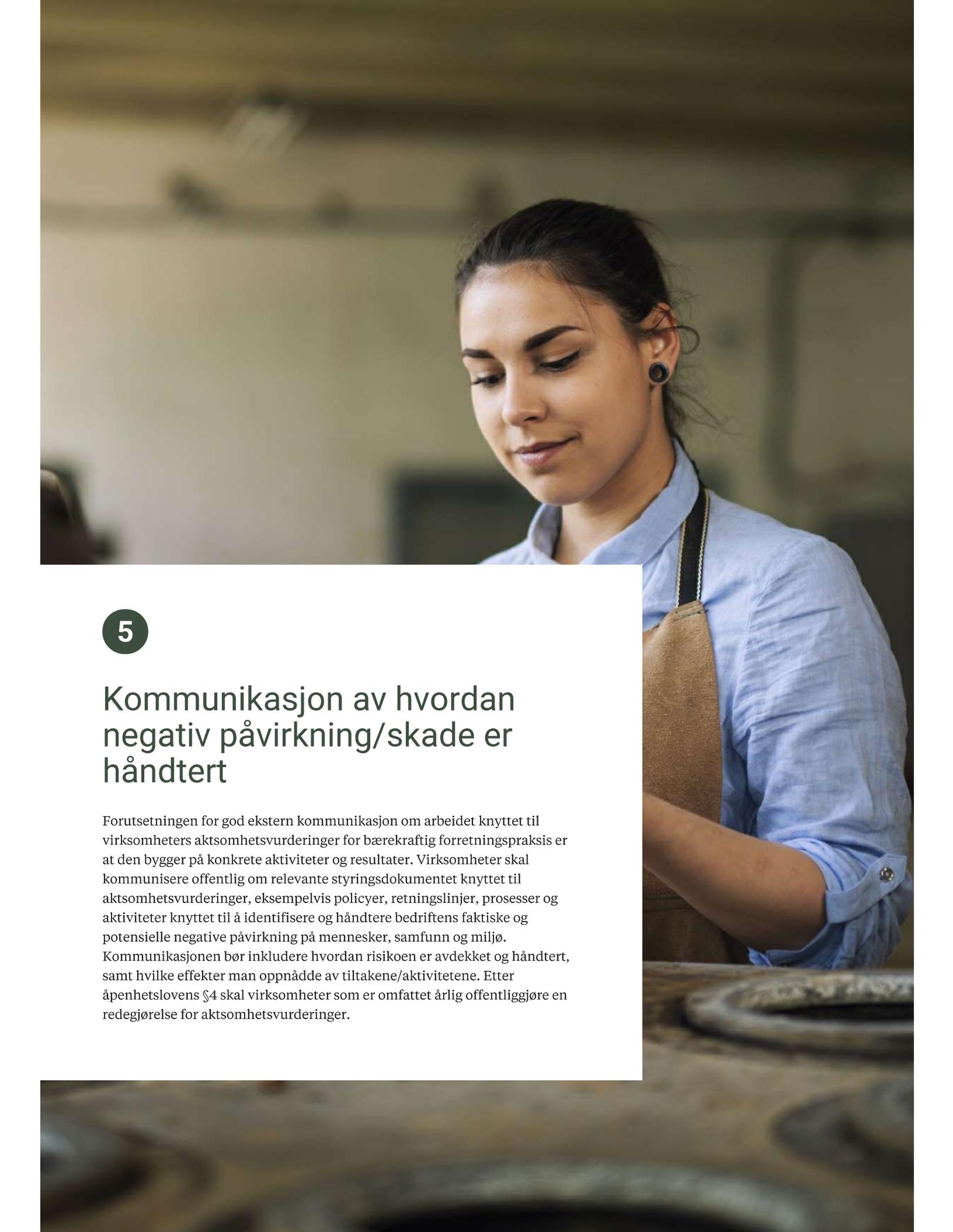
As mentioned earlier in this report, Nomono's current size and the fact that we don't have any revenue yet brings our focus towards educating all of the employees collectively and giving each and every one the responsibility to do their best in finding alternatives to common practices and following up the work on this continuously. Also, the Sustainability group plus COO and Supply Chain have the main responsibility of bringing this to the board - as well as in the organization and externally to subcontractors - and also to customers.

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### **4.A.2 Beskriv hvordan dere sannsynliggjør at virksomhetens tiltak for å identifisere, forebygge og redusere negativ påvirkning faktisk fungerer**

We have our "Guidelines for suppliers" as a first tool in identifying and preventing possible negative impacts. Our hope is that, even though our ordering quantity is a lot lower than most companies, we can start to touch upon certain topics already despite the fact that we cannot use them as demands. If the company/supplier is in the Scandinavian countries, we make sure that they are following our guidelines and that we visit production sites and clarify our encouragement for unionizing. Further, if the company/supplier is abroad we ask trusted local sources to get more insight into their practices by visiting the companies.

We try to reduce our negative impact by choosing the right materials and making sure our supply chain (both upstream and downstream) has an as little negative impact as possible.



## 5

# Kommunikasjon av hvordan negativ påvirkning/skade er håndtert

Forutsetningen for god ekstern kommunikasjon om arbeidet knyttet til virksomheters aktsomhetsvurderinger for bærekraftig forretningspraksis er at den bygger på konkrete aktiviteter og resultater. Virksomheter skal kommunisere offentlig om relevante styringsdokumentet knyttet til aktsomhetsvurderinger, eksempelvis policyer, retningslinjer, prosesser og aktiviteter knyttet til å identifisere og håndtere bedriftens faktiske og potensielle negative påvirkning på mennesker, samfunn og miljø. Kommunikasjonen bør inkludere hvordan risikoen er avdekket og håndtert, samt hvilke effekter man oppnådde av tiltakene/aktivitetene. Etter åpenhetslovens §4 skal virksomheter som er omfattet årlig offentliggjøre en redegjørelse for aktsomhetsvurderinger.

## 5.A. Kommunisere eksternt

### 5.A.1 Beskriv hvordan virksomheten kommuniserer med berørte interessenter om håndteringen av negativ påvirkning/skade

We aim to have an open dialogue with suppliers throughout the entire process. This enables us to discuss the harder questions, for example managing negative impact. We are obligated to do our best to ensure that this is handled immediately and with input from the people affected by it. Going forward, our aim is to conduct surveys among our suppliers' workers in high-risk countries. Further, we always have a direct contact at factories, to minimize the distance between us and the workers.

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### 5.A.2 Beskriv hvordan virksomheten kommuniserer offentlig rundt eget arbeid med kartlegging og håndtering av negativ påvirkning/skade

We try to be as transparent as possible. Since we are pre-revenue for the time being, we mainly aim to educate ourselves about sustainability work, responsible business conduct, and Nomono's role in making change happen. Our communication about this is mainly through policies and strategies on our homepage but our aim is to expand how and where we communicate to reach a broader audience via social media and other platforms.

In our work with responsible business conduct, we have actively worked toward getting input from all parts of the company and starting discussions that engage Nomono's employees. We believe that everyone at nomono has input for these types of questions. Our main focus so far has been on understanding the pre-defined notions within the consumer electronics industry. We believe that this will give us the foundation to work on our way of creating our own version with people, animals, and the planet in mind.

We have stumbled on quite a few things that have proven to be challenging. For one, we do see that many consumer tech businesses (and their customers) still see the product's supply chain as a bit of a black box. We do see non-transparent parts in our supply chain as well, especially when it comes to raw materials for our electronics. Other than that, we also realized that there is a lot that can be done but that the market and the main market shareholders have been going too slow for too long. We believe that start-ups like us can give a fresh perspective, and all the while we get bigger and a more influential voice in the market we have the opportunity to make some companies and people rethink their strategies when developing and buying things.



## 6

### Gjenoppretting der dette er påkrevd

Når en virksomhet har identifisert at den har forårsaket eller bidratt til skade på mennesker eller samfunn, håndteres skaden gjennom å sørge for gjenoppretting, eller samarbeide om gjenoppretting. Gjenoppretting kan innebære økonomisk erstatning eller kompensasjon, en offentlig beklagelse, eller at skaden på annet vis rettes opp. Det handler også om å sørge for tilgang til klageordninger for arbeidere og/eller lokalsamfunn slik at de kan få sin sak hørt og håndtert.



## 6.A Gjenoppretting

### 6.A.1 Beskriv virksomhetens policy for gjenoppretting ved negative konsekvenser for mennesker, samfunn og miljø

If Nonomo has identified that we as a company have caused or contributed to the damage or negative impact, it will be handled by delivering some form of improvement to the parties affected by our practices. The following 4 steps will be used by the Nomono Security Board, which deals with risk assessment for all parts of the company with a focus on compliance-related issues, to provide appropriate remediation.

1. Assess: The damage will be assessed together with the affected party to determine the cause and who in particular is affected.
2. Discuss & Research: What type of compensation or remediation is chosen, will be based on how similar cases have been handled by other companies and "the perspective of those affected on what is appropriate" (OECD, p. 88. 2018. Due Diligence Guidance for Responsible Business Conduct).
3. Implement: In practice, we will implement the agreed-upon remediation as soon as possible. These compensations can include compensations for victims, legal help (for the cases in which the negative impact was caused by another party than the affected one or Nomono), and long-term solutions such as grievance systems to prevent similar situations.
4. Follow up: While we follow up on our specific practical actions, we will also be going through our guidelines and practices to find out how this negative impact can be avoided in the future. This step is done internally and the changes are based on our own company policy.

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#### Beskriv eventuelle tilfeller av gjenoppretting i rapporteringsperioden

In the reporting year 2021, no cases have been reported where a remedy has been necessary.

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## 6.B Tilgang til mekanismer for gjenoppretting

### **6.B.1 Beskriv hva selskapet gjør for å sikre at påvirkede arbeidere og lokalsamfunn har tilgang til effektive mekanismer for gjenoppretting, når det er aktuelt**

We aim to ask all manufacturers what tools they have in place so that employees have the opportunity to make complaints/suggestions or raise conflicts or other feedback in the workplace. This is often through own practice in the individual workplace, but in some cases also via their unions. Ensure access to complaint mechanism.

We want to strive for all our subcontractors and their workers to have access to a complaint mechanism by setting this up in our third-party subcontractor contract.

Kontaktinformasjon:

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