



Norstat.no  
28.06.2023

---

# NORSTAT NORGE AS - REPORT REGARDING THE NORWEGIAN TRANSPARENCY ACT

28.06.2023

## **Content**

<b>NORSTAT NORGE AS -REPORT REGARDING THE NORWEGIAN TRANSPARENCY ACT.....</b>	<b>3</b>
INTRODUCTION.....	3
CONTACT INFORMATION.....	3
DUTY TO REPORT.....	3
<b>ABOUT NORSTAT .....</b>	<b>3</b>
WHO WE ARE AND WHAT WE DO.....	3
CONTEXT OF THE BUSINESS.....	5
INTERNAL GUIDELINES.....	5
TARGETS AND PROGRESS.....	6
HIGH LEVEL TARGETS AND PROGRESS.....	6
TARGETS FOR THE YEAR TO COME.....	6
HUMAN RIGHTS DUE DILIGENCE ASSESSMENT.....	7
FOCUS AREAS FOR OUR ASSESSMENT.....	7
HUMAN RIGHTS AND WORKING CONDITIONS AT Norstat.....	7
OUR SUPPLY CHAIN AND BUSINESS PARTNERS.....	7
INFORMATION GATHERING.....	8
IDENTIFIED RISK AREAS:.....	8
OUTCOME OF ASSESSMENT.....	9
MEASURES TO STOP, PREVENT OR LIMIT NEGATIVE CONSEQUENCES.....	9
Supplier code of conduct.....	9
Work climate surveys.....	9
Supplier audit function.....	10

28.06.2023

# NORSTAT NORGE AS -REPORT REGARDING THE NORWEGIAN TRANSPARENCY ACT

## INTRODUCTION

The Norwegian Transparency Act came into effect on July 1, 2022. The Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions. The Transparency act applies to larger enterprises, the defining criteria for which are based on economic figures and number of employees.

## CONTACT INFORMATION

Any questions regarding this report can be directed to Norstat's Quality Manager, Tone Belsvik at [tone.belsvik@norstat.no](mailto:tone.belsvik@norstat.no).

## DUTY TO REPORT

Norstat Norge AS is a larger enterprise resident in Norway, offering services inside and outside Norway, and therefore the Transparency Act applies directly to Norstat Norge AS. This means we have a duty to carry out a human rights due diligence assessment according to the OECD Guidelines for Multinational Enterprises, publish an account of the due diligence assessment and provide information. The first deadline for publishing a report is June 30<sup>th</sup>, 2023.

## ABOUT NORSTAT

### WHO WE ARE AND WHAT WE DO

Name: Norstat Norge AS

Address: Fridtjof Nansens plass 5, N-1060 Oslo, Norway.

Company registration number: 982 836 018

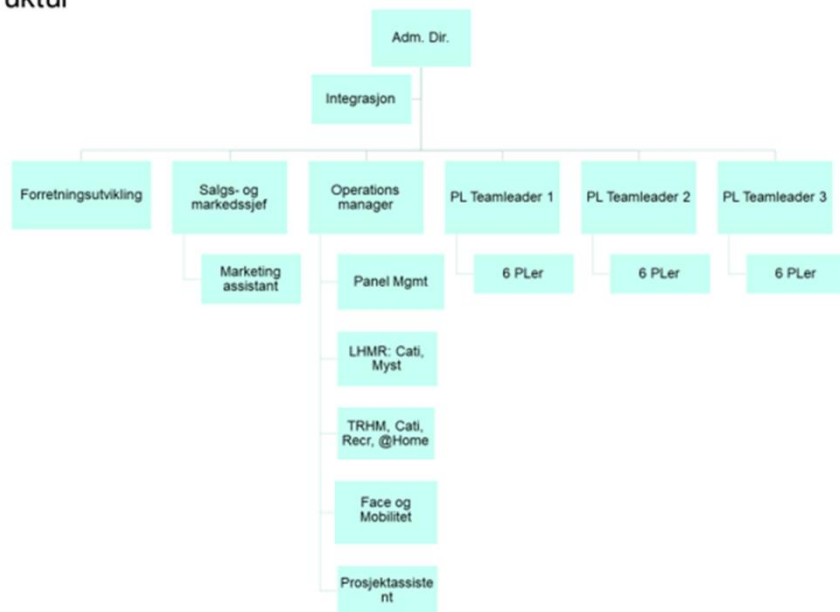
We have around 60 full-time employees, and around 400 interviewers and field office staff working part-time.

28.06.2023

Norstat Norge AS conducts data collection in the Norwegian market (CATI, Web and other). As part of this delivery model, Norstat Norge AS engages some external resources providing IT services including data programming and data processing. Norstat Norge supplies data collection and related services to a wide range of private and public companies including a mix of end clients and companies that deliver consulting services.

**Organizational structure:** The managing director of Norstat Norge AS has the following functions directly reporting to the MD: Business development, Sales and marketing, Operations, Project management team leads. In turn, these manage teams of project managers that are full-time employees, and field departments in several cities, where full-time department managers manage teams of part-time team leads and part-time interviewers conducting quantitative interviews and recruitments for qualitative studies. Norstat Norge is part of the Norstat Group and utilizes services from back-office functions regarding programming, operations management, central panel management, IT and our commercial team. These functions are supporting local markets across Norstat countries.

**Organisasjonsstruktur**



28.06.2023

**CONTEXT OF THE BUSINESS**

The market research industry plays an important role in many aspects of modern life, as provider of a foundation for sound business and social decisions, and of information on public opinion.

There has been a shift in recent years away from the labor-intensive and analogue "offline" methods like paper-based interviewing and computer-assisted interviewing where interviewers are involved in the interviewing process, towards online surveys and self-administered questionnaires, which today is dominant. In years to come, a further shift is expected towards "big data" - the consolidation of actual behavioral data with survey data to achieve a more holistic view of consumers and social agents.

Users of market research range from government agencies to private companies of all sizes. Data collection buyers include large end clients with in-house capabilities for analysis, market research companies without or with limited in-house data collection services, consultants, advertising, media or PR/Information agencies.

The market players in the industry range from small, specialised or local agencies focusing on one method or on analysis or consultancy, to large, multinational corporations providing the full range of data collection and analysis services in many markets. Norstat focuses entirely on the data collection process and offers most types of data collection currently available in the industry. Norstat only delivers raw data to our customers and offer no advisory services on top/in addition to the data itself. The common denominator for Norstat's customers is therefore that they are able themselves/have other means of interpreting and analysing the data.

Studies and reporting dashboards require IT resources in the form of programming. Norstat has resources in development and programming internally, located across the following Norstat countries: Norway, Sweden, Denmark, Estonia and Germany. Additionally, some programming of web surveys and dashboards is outsourced to three outsourcing partners that work according to the same work processes as the internal programming resources.

Outsourcing partners services make up a substantial part of the total programming services used in Norstat, and for this reason these outsourcing partners are a very important and integrated part of our value chain. These outsourcing partners are located in eastern Europe and Asia.

**INTERNAL GUIDELINES**

Social responsibility has been made part of Norstats internal guidelines through our sustainability strategy and our code of conduct and supplier code of conduct, where human rights and social responsibility topics are

28.06.2023

addressed. We also have a separate policy for Diversity and **Inclusion** as well as a **Whistleblowing** function to make sure that employees are able to let us know safely and easily if there are breaches of legislation or the code of conduct.

The board of Norstat AS has approved the plan to conduct and update human rights due diligence assessments on an annual basis.

In the due diligence assessments, the following roles have special responsibilities for following up suppliers, and for quality and compliance topics: Managing Director of Norstat Norge AS, Chief Commercial Officer, Chief Financial Officer, DP manager and Quality Manager, and all take part in the assessment.

We will perform Human Rights due diligence review of our own organization as well as our nearest outsourcing partners, in the first instance, as these are our key suppliers and the suppliers over which we have the most direct influence. We acknowledge that we have responsibility for considering the whole value chain. Over time, we will therefore extend the scope.

Based on the outcome of the due diligence review, we evaluate which areas are prioritized for further follow up, what monitoring routines we will have in place and whether there is a need for atonement or reparations.

## TARGETS AND PROGRESS

### HIGH LEVEL TARGETS AND PROGRESS

Norstat Norge AS is dedicated to supporting the human rights and ensuring decent working conditions for all our employees as well as throughout our supply chain. Our Code of Conduct is the framework describing how we expect our employees and board of directors to work in alignment with our values as well as legislation. We also have a Supplier Code of Conduct describing our expectations of our suppliers in the same areas, and we expect our suppliers to follow the same principles to as those we ourselves follow.

### TARGETS FOR THE YEAR TO COME

In the year to come, we want to follow up our outsourcing partners more closely to ensure that they are working in compliance with our supplier code of conduct and that the working conditions are decent and of a quality that is in line with global human rights and national legislation in the countries where they are located.

28.06.2023

**HUMAN RIGHTS DUE DILIGENCE ASSESSMENT**

## FOCUS AREAS FOR OUR ASSESSMENT

## HUMAN RIGHTS AND WORKING CONDITIONS AT Norstat

In Norstat Norge AS and the other Norstat companies, we are committed to working in line with national labor legislation and uphold human rights. To make sure that we are doing this, we have a code of conduct that is conveyed to all employees and leaders, and we have a whistleblowing function in place to ensure that any activity that may not be in compliance with code of conduct or national law is reported (anonymously if the whistleblower so wishes) and followed up.

We have good routines in place to ensure that employees are both respected and heard, including our annual work climate studies focusing on employee satisfaction and fair working conditions, coworker reviews and an internal audit function. Internally in Norstat we see no current risks to human rights or decent working conditions, but we will of course continue to monitor these areas and respond promptly if an issue arises that indicates that working conditions or human rights are not respected.

## OUR SUPPLY CHAIN AND BUSINESS PARTNERS

Our most important suppliers in a Transparency Act context are those of our suppliers who act as our outsourcing partners. These companies are market research companies on the IT side, who provide programming of surveys and of custom dashboards. The value of the services we buy from them is relatively high, from 0,5 MEUR and up, and we rely on them for different types of data processing on a daily basis. We have outsourcing partners located in Eastern Europe and in Eastern Asia. For some of our outsourcing partners Norstat is their main client, making our ability to influence them a real possibility.

Since these suppliers are all in the market research/ IT industry, the employees that work supporting Norstat services tend to people with higher education in the area of programming. The skills requirement for doing this type of work is high. Additionally, we work so closely with our outsourcing partners that our familiarity with most employees is almost the same as for our own internal employees that do the same type of work. Outsourcing partners' employees that are part of the overall service provision in programming services also take part in the same internal training schemes as Norstat employed employees.

28.06.2023

**INFORMATION GATHERING**

We have gathered information about working conditions among our most key suppliers over the last few years in these ways:

- We perform site visits for the purpose of strengthening the communication between ourselves and our outsourcing partners. In these visits, we are at the outsourcing partners' offices. For each of the outsourcing partners, we are happy to note that the standard of the physical working conditions is on a par with that we have in our own offices.
- We have approached the individual employees that work in deliveries to us directly and invited them to respond anonymously to an abbreviated version of our work climate survey over the last two years.
- For outsourcing partners where we pay per hour, we have reviewed time sheets.

**IDENTIFIED RISK AREAS:**

Given these circumstances, we feel confident that there is no real risk of child labor or forced labor in the companies we work with.

The following human rights/ decent working condition risk factors were identified by the key Norstat stakeholders owning the outsourcing contracts. These are viewed as the most relevant based on our knowledge of the countries they operate and our suppliers:

<b>Risk area</b>	<b>Description</b>	<b>Status/ follow up</b>
Discrimination	Discrimination based on ethnicity or gender is prevalent in some of the countries where we have suppliers.	While we have seen no indication that this is happening, it is worth investigating to make sure that this is not the case.
Work hour regulation violations	We would like to be reassured that national work hour regulations are upheld in our outsourcing partners' organizations. We have some insight into the working hours of employees in survey programming, as we are paying by the hour, and we can see signs of high workloads on a few of the	We will enter into a dialogue with the partners where we see indications that some employees may be working more than national labor law allows, to assure that this is not the case, or alternatively see what can be done from our side to bring workloads back to a more sustainable level.



28.06.2023

	most highly skilled employees.	
Right to organize	In some of our outsourcing partners' countries, the right to organization has a weak position.	We will follow up with suppliers directly to ensure that employees at outsourcing partners are allowed to join trade unions .

**OUTCOME OF ASSESSMENT**

We have not to date been able to positively identify any human rights breaches in our supply chain. We do see a risk for heavy workload on some employees with our outsourcing partners' organization, and this is an issue that we will follow up in dialogue with them.

Based on the general human rights risk situation in some of the countries where our outsourcing partners operate, we will also follow up more closely to check that they are working in compliance with human rights in and take a proactive stance in the areas of the right to join a trade union, and discrimination.

**MEASURES TO STOP, PREVENT OR LIMIT NEGATIVE CONSEQUENCES**

**Supplier code of conduct**

Our outsourcing partners have been asked to read, accept and sign Norstat's supplier code of conduct.

**Work climate surveys**

We already include employees in the annual work climate surveys we conduct mapping the work climate and employee satisfaction among internal Norstat employees; this has been the practice for two years already. The data collected to date indicate that job satisfaction among outsourced employees is quite similar to that of Norstat's internal employees. However, to utilize this tool even better, we will update the questionnaire to make a shift from more practical and general questions to also asking questions related to diversity and inclusion matters, and matters related to human rights and decent working conditions.

28.06.2023

Supplier audit function

We will in the year to come use our internal audit function to perform a supplier audit with focus on human rights and decent working conditions, engaging our outsourcing partners in discussions about how rights are respected and what we can mutually do to prevent unsustainable workloads.

OSLO, 28.06.2023

Signed by all members of the Norstat Norge AS board :