Transparency Act

IBM Norway is a local subsidiary and sales organization of ultimate parent, International Business Machines Corporation. IBM products and services offered by IBM Norway are produced or procured by companies within the IBM Group of companies. IBM Norway govern local services produced by our employees. Main local suppliers to IBM Norway are advisory and real estate services. Under the Transparency Act, IBM shall regularly carry out reviews in proportion to the size of the enterprise, the nature of the enterprise, the context of its operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions. IBM Norway is a part of IBM as a global company, that aspires to make a lasting, positive impact on the world in business ethics, our environment, and the communities in which we work and live. Among most relevant documents for the applicability and governance under the Transparency Act in IBM Norway available at www.ibm.com, are:

IBM’s Business Conduct Guidelines
IBM’s Business Conduct Guidelines (BCGs) is our code of business conduct and ethics for our directors, executive officers, and employees. Together with the IBM Business Partner Code of Conduct, BCG is also applicable to IBM Business Partners that are authorized to market IBM products and services. Link: https://cms.ibm.com/investor/governance/business-conduct-guidelines

IBM’s Policies
IBM’s policies govern our internal and external company-wide actions, also with respect to fundamental human rights and decent working conditions. Link: https://www.ibm.com/impact/reports-and-policies


About the RBA (responsiblebusiness.org)
IBM is a member of the RBA, which is a nonprofit coalition of leading companies dedicated to improving social, environmental, and ethical conditions in their global supply chains. The RBA has a Code of Conduct and a range of programs, training, and assessment tools to support continual improvement. The RBA Code of Conduct is a set of social, environmental, and ethical industry standards. The standards set out in the Code of Conduct reference international norms and standards including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises, ISO and SA standards, and many more. While the Code of Conduct originated with the electronics industry in mind, it is applicable to and used by many industries beyond electronics. Link: https://www.responsiblebusiness.org/about/rba/

For third party products and services, IBM require vendors to comply with the IBM Supply Chain Responsibility requirements and also have audit processes in place: https://www.ibm.com/procurement/socialresponsibility

IBM Norway has anchored responsibility for review procedures, outcome of risk assessment and overall compliance with the Transparency Act with the board of directors and local management team. Having performed first reviews regarding own employees in accordance with the OECD guidelines linked to fundamental human rights and decent working conditions, focus areas are to review our local supply chain. We will continue to perform periodic reviews for Norway, and we will also increase collaboration with other IBM companies within our market which are or will be subject to similar legislation (such as Germany) to improve both understanding and governance. Questions for insight shall be directed to HR manager Christina Sundby Knudsen at sundby@no.ibm.com