

Report for the Transparency Act 2022

British American Tobacco Norway AS

This document reports on the progress made with the implementation of the Norwegian Transparency Act (the “Transparency Act”) between July 2022 and June 2023 at British American Tobacco Norway AS (“BAT Norway” or the “Company”) as per dispositions of the section 5 of the Transparency Act.*

About BAT Norway

BAT Norway is a member of the British American Tobacco Group (the “BAT Group”) registered as an independent legal entity in Norway. It is responsible for the distribution and trade activation of products to wholesalers in the Norwegian duty paid domestic market. These products are:

- cigarettes
- snus
- roll your own tobacco (“RYO”)
- cigars
- tobacco surrogate products.

The Company has 36 employees, a commercial office in Oslo, and a nationwide presence through trade marketing representatives.

British American Tobacco p.l.c. is the top holding company of the British American Tobacco Group of companies. It is headquartered in London, United Kingdom and listed in the London Stock Exchange (LSE), Johannesburg Stock Exchange (BTI), and, as American Depositary Shares, on the New York Stock Exchange (BTI). It has operations in over 180 countries and employs over 53,000 people. The corporate purpose of the BAT Group is to build “A *Better Tomorrow*™” by reducing the health impact of its business through offering a greater choice of enjoyable, scientifically substantiated reduced risk^{††} alternatives to smoking.

Conducting its affairs with honesty, integrity, and transparency is key to all BAT Group companies, including BAT Norway. These elements are key if BAT Group companies and, therefore, the BAT Group as a whole are to continue to develop as a responsible and successful business. In line with the BAT Group’s approach, BAT Norway’s corporate behavior is built on:

- **Delivery with integrity:** we are committed to sustaining a culture of integrity. Business standards should never be compromised for the sake of results.

^{*} The Norwegian Transparency Act entered into force on 1 July 2022. The full text of the law is available in the portal of Lovdata at <https://lovdata.no/dokument/NL/lov/2021-06-18-99>

[†] Based on the weight of evidence and assuming a complete switch from cigarette smoking. These products are not risk free and are addictive.

- **Respecting human rights:** we respect the rights of people across our supply chain and our own operations.
- **Marketing responsibly:** we are committed to marketing all tobacco and nicotine products responsibly and only to adult consumers.
- **Engaging responsibly:** we are committed to conducting all company engagement activities with external stakeholders with transparency, openness, and integrity.

Governance Structures

At a global level, the Statement of Delegated Authorities (the “SoDA”) forms part of a policy framework by which British American Tobacco p.l.c., as the BAT Group’s ultimate parent company, promotes good corporate governance, risk management and internal control within the BAT Group. The SoDA aims to ensure that the British American Tobacco p.l.c. board of directors and delegated senior management have strategic oversight of BAT Group operations, while ensuring that the BAT Group companies remain highly autonomous within the BAT Group strategy.

In Norway, as per disposition of Norwegian regulation, BAT Norway has a board of directors (the “Board”) responsible to manage the Company, including appropriate corporate governance. Moreover, the Board carries the responsibility to oversee that the Company adheres to all applicable laws and regulations and adequately manages any risks including those related to adverse impacts on human rights and decent working conditions.

Further, the country manager of BAT Norway (the “Country Manager”) is responsible for the daily operations of the Company focusing on distribution and trade marketing activities in line with the established internal controls and risk management within the BAT Group.

An Engagement & Communication Manager assists with the implementation of the Transparency Act and assist with information requests that may arise.

Strategic Management: Control Environment

BAT Norway operates under the BAT Group’s primary management system for controls (the “Control Navigator”). Its designed is to provide Senior Management with reasonable assurance that the Business is operating within a controlled environment. Entity level controls include laws and regulations, policies, and procedures, as well as financial, operational and compliance related controls. The Control Navigator assessment enables the companies to self-assess their internal control environment, assist them in identifying any controls that may need strengthening and support them in implementing and monitoring action plans to address control weaknesses.

The Control Navigator assessment is reviewed annually to ensure that it remains relevant to the business and covers all applicable key controls. In addition, at each year-end, the BAT Group operating companies and other business units are required to:

- review their system of internal control, confirm whether it remains effective, and report on any specific control deficiencies and the action being taken to address them; and,

- review and confirm that policies and procedures to promote compliance with the Standards of Business Conduct (SoBC)[‡] are fully embedded and identify any material instances of non-compliance.

The results of these reviews are reported to the relevant Regional Audit and CSR (Company Social Responsibility) Committees or to the Corporate Audit Committee, and to the Audit Committee, to ensure that appropriate remedial action has been, or will be, taken where necessary. They are also considered by the SOx (Sarbanes-Oxley Act) Steering Committee and the Disclosure Committee in determining management's opinion on the internal controls over financial reporting ("ICFR") at the Group level.

In operational terms, national, regional, and global functions associated with procurement, legal and other departments provide support to BAT Norway's Country Manager to implement the control environment in relation to, among others, risk-based management of the business relations with suppliers or customers. The internal controls mandate risk-based assessments of third parties, adequate contracting, monitoring, and others. The Board receives regular updates on progress with the quality of the implementation of the control environment.

Strategic Management: Ethics and Integrity

Additionally, the work with ethics and integrity is essential to ensure that the BAT Group works with a consistent set of rules and standards of behavior across the BAT Group. Building a culture based on ethical values is key in an organization as diverse and multinational as the BAT Group. The *Delivery with Integrity* program drives a consistent approach to managing key risks, including bribery and corruption. The SoBC covers areas such as anti-bribery and anticorruption, political contributions, anti-money laundering and tax evasion. The Supplier Code of Conduct (the "SCoC") outlines the minimum standards expected of suppliers and also includes provisions relating to anti-bribery and anticorruption, sanctions, anti-tax evasion and anti-illicit trade.

The BAT Group require all new full-time employees complete an e-induction on the SoBC across all companies in the BAT Group. Employees must also complete an annual SoBC sign-off which includes attestation of their adherence to SoBC for the year prior to completion of sign-off.

More information on BAT Group's Ethics and Integrity program is available at the Combined Annual and ESG Report 2022.

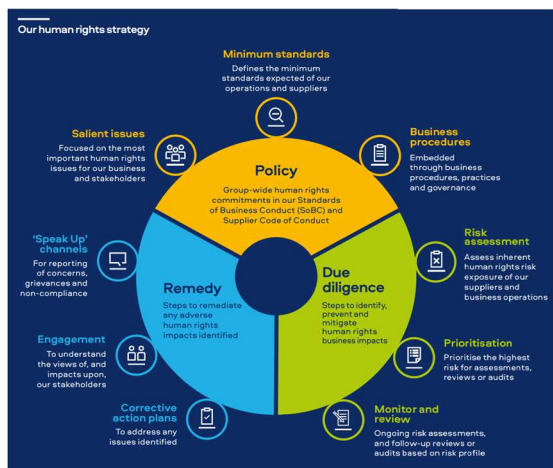
Grievance Mechanisms

The BAT Group's Speak Up channels are available to the general public to report any concern or grievance associated with BAT Norway or any other entity of the BAT Group. The channels may receive notifications through an online platform, by text or by telephone 24 hours a day in multiple languages.

[‡] BAT's Standards of Business Conduct are available online at https://www.bat.com/group/sites/UK_9D9KCY.nsf/vwPagesWebLive/DO5TXKRH

The speak up channels are independently managed with all information handled confidentially. The SoBC and the SCoC clearly establish the corporate policy that no one will suffer any direct or indirect reprisal for speaking up about actual or suspected wrongdoing.

Human rights strategy



Aligned to the BAT Group's approach to human rights, BAT Norway addresses human rights in the following way:

- **Policy**
- **Due Diligence**
- **Remedy**

This strategy lays down the foundations for business assessments and decisions.

Read more at [BAT Human Rights Report: Journey to A Better Tomorrow™](#).

Policy

All BAT Group companies are required to comply with all relevant applicable labor laws and regulations in addition to the BAT Group's long-standing commitment to respect fundamental human rights, as affirmed by the Universal Declaration of Human Rights. As such, BAT Norway's approach on people and human rights practices is based on local and international labor laws, recommended practices and guidelines, including:

- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises.

Human rights are embedded in the SoBC, which are the highest set of global policies implemented for application by all BAT Group companies, including BAT Norway. The BAT Group operations are expected to always be conducted in a way that respects the human rights of the BAT Group employees, the people the BAT Group works with and the communities in which the BAT Group operates. The SoBC includes, among others:

- Respect of fundamental human rights as affirmed in the Universal Declaration of Human Rights
- Policy on people and human rights practices based on local and international labor laws, recommended practices and guidelines

- Support of ILO Conventions 138 and 182 which set out fundamental principles concerning the minimum age for admission to employment and for the elimination of the worst forms of child labor
- Respect freedom of association and collective bargaining
- No exploitation of labor or modern slavery
- Encouragement of engagement with local communities
- Requirement for Suppliers to meet the Supplier Code of Conduct

Additionally, the SoBC covers other integrity topics that are key to respecting human rights, including but not limited to, anti-bribery, anti-corruption, conflicts of interests, Speak-Up channels, and investigations.

At the BAT Group level, BAT publishes a Modern Slavery Statement each year, in accordance with the UK Modern Slavery Act. The Modern Slavery Statement sets out the steps that BAT Group companies, including BAT Norway, have taken to prevent modern slavery during the relevant period.

The BAT Group policies are underpinned by a range of principles, statements, operating procedures, standards and guidelines to help support effective implementation of the commitments throughout the BAT Group, including BAT Norway. Upon implementation for local application, this framework supports the identification, management and control of risks and opportunities for BAT Norway's business, including with respect to human rights. Some of these are:

- The Group Health and Safety Policy Statement aims to ensure the application of the best international standards of practice relating to the health and safety of employees at work and non-company personnel on company premises and to give a high priority to these activities.
- The Group Sustainability Agenda demonstrates a commitment to respect the rights of the BAT Group employees, the people the BAT Group works with and the communities in which the BAT Group operates, across its supply chains and business operations. The BAT Group is committed to "delivering a positive social impact" working on human rights, monitoring supply chains and people, diversity & culture, among others. Progress on these commitments are communicated through the Combined Annual and ESG Report 2022.
- The Sustainable Tobacco Program (STP) is a platform set up to support the industry's due diligence efforts. . It is an industry wide program to help drive standards in agriculture and collates information on issues relating to human rights and labor rights e.g., child labor on farms, forced labor, operational standards for personal protective equipment. All Leaf suppliers are expected to participate in the STP and the requirements are outlined within BAT's Leaf Supplier Manual, which sets out detailed standards that all our tobacco suppliers are expected to adhere to .
- The SCoC complements the SoBC by defining the minimum standards expected of all suppliers to any BAT Group company, including specific criteria related to human rights.

The SCoC covers a wide range of topics including compliance, human rights, environmental sustainability, marketing and trade and business integrity. BAT Norway has implemented the SCoC for local application and applies the SCoC in all contracts with suppliers as a part of routine contractual practices.

Due Diligence

Respecting human rights in BAT Norway's supply chain is a key part of its responsible procurement processes. Suppliers undergo a due diligence assessment which includes risk assessments and supplier monitoring activities. BAT Norway utilizes the BAT Group's third-party integrated risk assessment and due diligence platform, the Coupa Risk Assess Platform ("CRA"), for its due diligence of its suppliers. Such processes enable BAT Norway to identify risks at supplier and customer level. This standard operational process is initiated prior to onboarding third parties and continuously during the underlying business relationship.

Remedy

The BAT Group policies, as implemented for local application, indicate the processes for identifying the applicable remediation measures to cease, prevent or mitigate risks. BAT Norway seeks to mitigate the identified potential human rights risks. Prevention measures cover contracting practices where suppliers and business partners have undertaken compliance with and are familiar with the latest versions of the SCoC and other applicable policies.

Risk mitigation measures are operational routines that require the suppliers are (re)assessed through CRA:

- Prior to engagement
- During contract revision or renegotiation
- At a particular frequency given the initial identified risk.

Risk mitigation also includes follow up or monitoring of agreed actions with suppliers by engaging in dialogue.

Suppliers of natural raw materials, such as tobacco leaf, are commercially managed by a BAT Group entity. Further details on how the BAT Group manages the global leaf is available in the Combined Annual and ESG Report (2022). Other initiatives that seek to cease, prevent, or mitigate impacts on human rights with subsequent suppliers are managed by the relevant contracting entities across the BAT Group.

Human Rights Due Diligence at BAT Norway

Complementing the BAT Group's human rights strategy and approach, BAT Norway has engaged an independent third party to assist in conducting a dedicated human rights due diligence for BAT Norway's third parties with the aim to comply with the requirements of the Transparency Act applicable solely to BAT Norway. Results of this independent assessment are an integral part of the internal controls BAT Norway has in place for monitoring its third parties.

The Transparency Act builds on the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights (UNGPs) approach to due diligence by recognizing the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed by companies.

Human Rights Due Diligence Assessment Method

The due diligence assessment follows the requirements of the Transparency Act and OECD Guidelines for Multinational Enterprises as prescribed herein. The assessment was applied solely to third parties linked to BAT Norway's existing and active business relationships during 2022. Risk identification is understood as an ongoing activity, given that risks may change over time in line with operational changes or external factors.

To identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that BAT Norway may have either caused or contributed to, or that are directly linked to its operations or products via the supply chain or business partners, the assessment follows the established criteria in the OECD Due Diligence Guidance[§]:

- Country risks
- Sector risks
- Product risks
- Enterprise-level risks

Following the assessment, the third parties were classified in groups of risk exposure of low, medium, or high of any potential negative impact on human rights or decent labor conditions.

When assessing the country risks, information from the Global Rights Index, Labor Rights Index and Transparency International's Corruption Perception Index were considered. Enterprise-level risks were assessed based on the knowledge of the contracted company gathered through due diligence, history of the business relations, etc.

For assessing the sector and product risk, BAT Norway used the list of high-risk products from the Norwegian Government Agency for Financial Management (DFØ)** and guidelines per industry from the Norwegian Labor Inspection Authority (Arbeidstilsynet) on minimum legal requirements regarding wage and labor rights per industry. The assumption is that the listed high-risk products and sectors in Norway are applicable worldwide. Other sectors and products were also independently considered.

[§] The OECD Due Diligence Guidance for Responsible Business Conduct is available at <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

^{**} The list of [high-risk products](https://anskaffelser.no/en/english/public-procurement-and-human-rights#anchorTOC_The_High_Risk_List_2) from the Norwegian Government Agency for Financial Management (DFØ) is available at https://anskaffelser.no/en/english/public-procurement-and-human-rights#anchorTOC_The_High_Risk_List_2

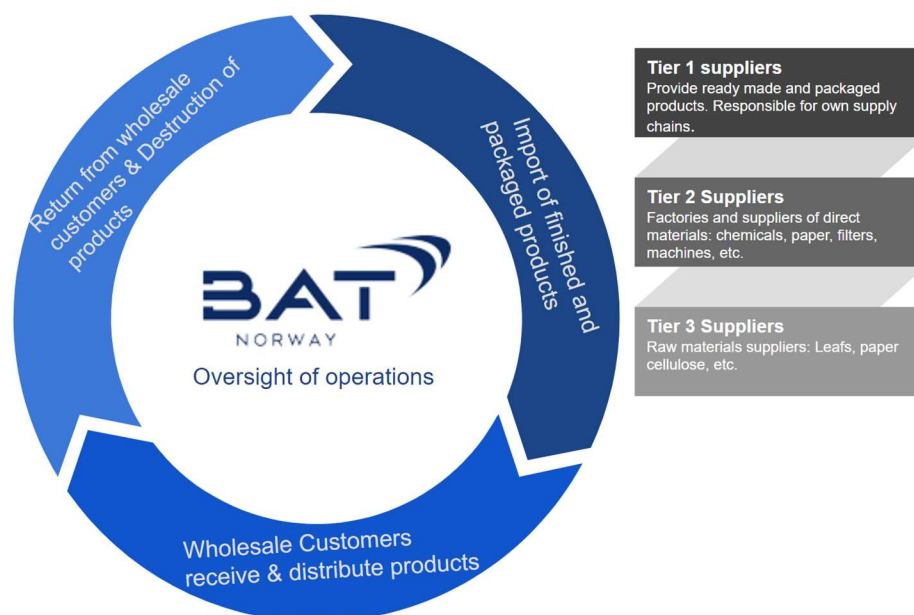
Due Diligence Findings

BAT Norway's Business Model and Supply Chain

The Transparency Act defines supply chain as “any party in the chain of suppliers and sub-contractors that supplies or produces goods, services or other input factors included in an enterprise's delivery of services or production of goods from the raw material stage to a finished product”^{††}. The Transparency Act defines the concept of business partners as “any party that supplies goods or services directly to the enterprise, but that is not part of the supply chain”^{‡‡}.

BAT Norway's business model is to distribute cigarettes, roll your own (RYO) tobacco, snus, cigars and tobacco surrogates to wholesalers in the Norwegian market (customers). The Company has a limited number of large wholesaler customers who sell the products through their retail networks. As a distribution entity, BAT Norway's supply chain is short as it does not comprise any production or transport activities. Operationally, BAT Norway imports finished goods under incoterms “delivered at place”. Thus, suppliers are responsible for transportation from factories to an outsourced logistic center that functions as BAT Norway's warehouse.

Graphic 1: Visualization of BAT Norway's operations



Subsequently in the chain of custody, products are picked up by the wholesaler customer and transported by them to their distribution centers for later shipments to their retailers. Retailers, in turn, sell products to the final consumer. BAT Norway may, at occasions, receive a limited number of returned products from retailers via their wholesalers to BAT Norway's warehouse, from where the products are later shipped to and destroyed at an approved disposal facility.

^{††} Transparency Act §3 letter d.

^{‡‡} Transparency Act §3 letter e.

In general terms, suppliers can generally be broken down into a structure of tiers depending on the closeness to the business or final products. Tier one suppliers are the actors a company conducts business with. Tier two suppliers are the actors where tier one suppliers source the materials. Tier three suppliers are actors that normally work in the raw material segment and are one step further removed from final products.

As a distribution company, BAT Norway's main first tier supply chain suppliers are companies that provide finished goods already packed. These are companies within the BAT Group or other suppliers that have traditionally being engaged through long standing business relationships. The second tier of supply chain suppliers is a group of companies that provide materials such as paper, plastic, chemicals, tobacco, filters, and engage in production activities. The third tier of supply chain suppliers is typically composed of actors providing raw materials as tobacco leaf or cellulose pulp.

BAT Norway's Suppliers and Business Partners

The Transparency Act requires that business relations are classified between supply chain and business partners. During 2022, BAT Norway had direct business relations with 150 third party suppliers. Of those, 12 were identified as supply chain and 138 were identified as business partners.

BAT Norway's main supply chain supplier of finished goods is an entity in the BAT Group. In collaboration with the entity, the sub-suppliers of raw materials and production activities to the entity were identified. The group of sub-suppliers (second tier supply chain) is mainly composed of actors participating in the production of the finished goods and can be arranged into three large categories:

- Factories
- Suppliers of product materials: processed products like plastic, paper, chemicals, etc.
- Suppliers of natural raw materials: tobacco leaf and ingredients.

BAT Norway also engages business partners for the provision of products and services associated with the commercial and back-office operations not involved in the supply chain. These include enterprises providing advisory, IT and communications, marketing, financial, facility services, and others.

BAT Norway's supply chain geographical presence

The risk exposure of BAT Norway's suppliers according to the assessment of the jurisdictions in which the third parties are located is based on information from the Global Rights Index, Labor Rights Index and Transparency International's Corruption Perception Index.

The direct suppliers of BAT Norway are mainly based in Western Europe. The largest supplier is a company of the BAT Group, which follows the same governance model. The vast majority of

business partners are Norwegian entities. All of BAT Norway's customers are Norwegian entities.

Given that the suppliers in the first and second tier of the supply chain are geographically located in European countries, based on our risk assessment, the risk of breaching basic human rights and decent working conditions is deemed to be generally low with some medium risk jurisdictions. Most of the western European jurisdictions are deemed to have adequate regulations and supervisory authorities on human rights issues.

Second tier of suppliers are also located across Europe.

Industry or Product Risk for BAT Norway

For assessing the sector and product risk, BAT Norway used the list of high-risk products from the Norwegian Government Agency for Financial Management (DFØ)^{§§} and guidelines per industry from the Norwegian Labor Inspection Authority (Arbeidstilsynet).

High risk of negative impact of human rights and/or adequate labor conditions within BAT Norway's supply chain are mainly associated with the production of raw materials or production of finished goods. At the first tier of suppliers, the assessment did not identify any high or medium risk supplier.

Business partners in high-risk industries were deemed as high risk due to the overall sector assessment. In the analysed second tier of suppliers, companies linked to high-risk sectors were assessed as high or medium risk.

The table below summarizes the identified risks BAT Norway is exposed to for potential negative impact on human rights in relation with the industry or type of products or services supplied by third parties.

Business relationship	Product /Service	Risk assessment	Type of risk	Leverage
Business Partners (tier 1)	Services of security, logistics and office maintenance.	Medium	Risk of inadequate labor rights standards and/or social dumping	Low
	Waste management	Medium	Health Safety and Environment ("HSE") risks	Low
Supply chain (tier 2)	Tobacco	High	Inherent child labor risk associated with the	Varied

^{§§} The list of high-risk products from the Norwegian Government Agency for Financial Management (DFØ) is available at https://anskaffelser.no/en/english/public-procurement-and-human-rights#anchorTOC_The_High_Risk_List_2

		cultivation of tobacco.	
Paper	Medium	Potential negative impact at the paper raw material suppliers due to poor working conditions.	Low
Plastic	Medium	Potential negative impact at the production of plastic due to poor working conditions, specially associated to HSE.	Low

Enterprise-Level Risk for BAT Norway

BAT Norway has predominantly long-standing relationships with its suppliers. There is no known adverse information on any of the supply chains, business partners or customers resulting from the due diligence or the integrity monitoring process. In line with applicable policies, BAT Norway works continuously with its third parties to formalize the underlying business relations through contracts as applicable. Contracting practices, include among others, third party's acknowledgement of the SCoC.

The BAT Group has in place control mechanisms to assess and routinely follow up on the suppliers of natural and product raw material through its supply chain due diligence (SCDD) program and its Sustainable Tobacco Program. These processes allow the Company to become better familiarized with its counterparts; thus, providing a better oversight of the suppliers, potential risks, or impacts.

BAT Norway does not purchase natural raw materials directly. As such, suppliers of natural raw materials (tier 2 and below) are covered by the BAT Group's management of its tobacco supply chain includes due diligence of raw materials supply chain, monitoring of its directly contracted farmers and the requirement that suppliers have similar monitoring systems of their farmers, and human rights impact assessments by BAT Group companies Due diligence in the raw materials supply chain monitors farms and human rights impact assessments by BAT Group companies.

Breach Mapping

BAT Norway has not uncovered any violations of human rights or decent working conditions during its business relations with direct suppliers and business partners. It has neither identified cases that require remediation. The Company will continue to work with third parties to ensure they are familiarized with the expectation in terms of responsible business laid out in the SCoC and the requirements of the Norwegian Transparency Act.

Actions Undertaken

BAT Norway has worked during 2022 and the first half of 2023 to establish the implementation of the Transparency Act in its activities. The Company has worked closely with supporting functions within the BAT Group to:

- Establish dialogue channels with relevant functions in order to align the implementation of human rights policies with the national work on the Transparency Act.
- Anchor a process to implement the Transparency Act with dedicated roles and responsibilities.
- Identify all policies relevant to human rights and decent working conditions.
- Conduct an independent human rights due diligence for BAT Norway's supply chain.

The way forward

To further strengthen BAT Norway's efforts in relation to human rights issues and decent working conditions in their direct business relationships, as well as to continuously reduce its risk exposure, it plans to enhance the existing practices by conducting the additional following activities during 2023 and 2024.

These measures seek to avoid negative impact and to mitigate any potential harm on human rights throughout the BAT Norway supply chain.

Prioritized measures for 2023 and 2024

Identified risk	Continued roll out of CRA implementation in BAT Norway. CRA has not been applied to all existing suppliers yet.
Measure	Assess the prioritized suppliers or business partners in CRA.
Identified risk	Potential negative impact at the paper raw material suppliers due to poor working conditions.
Measure	Coordinate with corporate functions to establish options to engage in dialogue with key third-party suppliers.
Identified risk	HSE inherent risks related to the production of plastic.
Measure	Coordinate with corporate functions to establish options to engage in dialogue with key third-party suppliers.
Identified risk	Inherent risk of engaging child labor in the tobacco supply chain.
Measure	Norway adheres to the BAT Group's continues to work towards its aim for zero child and forced labor in its tobacco supply chain as set out in the Combined Annual and ESG Report

Identified significant risk

Inherent risk of inadequate labor rights standards and/or inadequate pay.

Measure

- Confirm all active business relationships have pledged to adhere to SCoC and other applicable policies.
- Follow up with actors to confirm they commit to adhere to the vigilance duty (Påseplikt^{***} as per Norwegian national regulations).
- Confirm how such suppliers are working on the implementation of the Transparency Act.

Additional measure

Engage in dialogue with key customer accounts to check their progress with the implementation of the Transparency Act.

Right to information

BAT Norway has put in place a mechanism to provide information to the public and other stakeholders with an interest in its work on human rights and decent working conditions. Questions about BAT Norway's work with The Transparency Act can be directed to its press contact at any time. BAT Norway received no information requests during the financial year 2022.

Reporting on the continuous progress on the Transparency Act encompassing due diligence and implementation of established actions will be published annually in at the BAT Norway's website.

Relevant links

[BAT Norway website](#)

[BAT Human Rights Report: Journey to A Better Tomorrow™](#)

[Human Rights and modern slavery at the BAT Group](#)

[BAT Group Modern Slavery Statement](#)

[Human rights and child labor in tobacco growing](#)

[BAT Group Sustainability Agenda](#)

[Sustainable Tobacco Program \(STP\)](#)

^{***} In the vigilance duty (påseplikt in Norwegian), the main supplier must ensure that the pay and working conditions of the company's subcontractors are in accordance with the applicable general regulations.

[BAT Group Health and Safety Policy Statement](#)

[BAT Group Speak Up](#)

[Integrated supply chain due diligence for product materials](#)

[Due diligence for tobacco leaf operations](#)

[Combined Annual and ESG Report 2022](#)

Signatures- Board of Directors of British American Tobacco Norway AS

Oslo, 28th June 2023

Board of Directors of British American Tobacco Norway AS

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