



# Åpenhetsloven

Redegjørelse om aktsomhetsvurderinger 2025



FagFlis sin opprinnelse stammer tilbake til 1980, da murmesterfirmaet Per Lund AS startet med import av keramiske fliser. Deretter startet L-Flis & Interiør AS opp i Oslo i 1989 med import av flis og butikkutsalgsalg. Noen år senere, i 1996, ble kjeden FagFlis etablert. Fra og med 1998 har vi også vært etablert i Gøteborg. Gjennom 2000-tallet opplevde kjeden en jevn vekst, hvor stadig nye medlemmer kom til, og FagFlis ble en landsdekkende kjede og en av hovedaktørene for salg og distribusjon av keramiske fliser. FagFlis har siden 2022 vært eid av Neumann Bygg AS og STARK Group (Tidligere DT Group og før det Dansk Trelast)

STARK Group, med hovedsete i København – Danmark, er i dag Nord-Europas største aktør innen salg av Byggevarer, med virksomhet i Danmark (inkl Grønland), Norge, Sverige, Finland, Tyskland, Østerrike og Storbritannia. Konsernet omsetter pr juni 2024 for ca 110 milliarder NOK.

I Norge har FagFlis 25 avdelinger hvor 13 er egneide og 12 er frivillige medlemmer. Hovedkontoret er i Sagveien 21 i Bydel Sagene. FagFlis har ca 150 medarbeidere og omsetter for ca 600 millioner NOK.

FagFlis-kjeden driver med import og salg av keramiske fliser med tilbehør til den profesjonelle kunden.

Vi har ingen produksjon av varer, men kjøper ferdig sammenstilte varer for videresalg og distribusjon.

## Retningslinjer og rutiner knyttet til Åpenhetsloven

FagFlis AS har valgt å organisere arbeidet med Åpenhetsloven slik at bærekraftsansvarlig Reidar Dilling er ansvarlig for at loven følges, dog med bistand av Adm. Dir for selskapet, slik at det er god forankring til ledelsen i Fagflis. Organisering knyttet mot bærekraft er valgt fordi FagFlis som utelukkende selger sammenstilte varer, vurderte ved lovens innføring at Sourcing/Innkjøp er der hvor vår risiko antas å være høyest. Det ble våren 2024 etablert egen epost adresse [apenhetsloven@fagflis.no](mailto:apenhetsloven@fagflis.no), samt på nettsidene lagt ut informasjon om åpenhetsloven på <https://fagflis.no/apenhetsloven/>.

Som en del av STARK Group inngår FagFlis-kjeden i konsernets innkjøpsorganisasjon, Stark Sourcing, hvor alle leverandører kartlegges og risikovurderes av Dun & Bradstreet. Dette systemet anvender en karakterskala for ulik risiko. Leverandører med for svak score blir ikke godkjent.

Som en del av standardavtale / kontraktsvilkår med alle leverandører er vår [Supplier Code of Conduct](#). Ved signering av Stark Groups kontraktsvilkår signerer man også på at man kjenner til, og etterlever, vår *Supplier Code of Conduct*.

Relevante rutiner / policies som er utarbeidet og som er en del av vår arbeidshverdag er:

- Human rights policy
- Environmental & Climate policy
- Sustainability policy
- Product integrity policy
- Supplier Code of Conduct
- Code of Conduct – medarbeidere

# Human Rights Policy

## Requirements

STARK Group Human Rights principles:

### 1. We are committed to respecting Human Rights:

We are committed to respecting fundamental human and labour rights within our own operations and through our collaboration with our value chain. Our human rights due diligence process aims at identifying and assessing our key salient human rights issues, integrating findings from impact assessments into relevant company processes, tracking the effectiveness of measures and processes, and communicating on how impacts are being addressed. Our due diligence process has a risk-based approach based on 3<sup>rd</sup> party ESG ratings, country, industry and spend.

### 2. We comply with all applicable laws and human rights commitments:

Our commitment is based on core ILO conventions and internationally accepted frameworks from the OECD and the United Nations including the UN Guiding Principles on business and human rights, as well as compliance with applicable local legislation where we operate.

### 3. We expect our suppliers to be committed to respecting human rights:

We also expect our suppliers to be committed to respect the human and labour rights stated on page 4, within their operations and supply chain.

Our supplier due diligence process is continuously updated with the aim to identify, mitigate, prevent and account for adverse human rights impacts caused by or contributing to via our operations.

### 4. We are committed to provide remediation:

We are committed to provide appropriate remediation to harmed individuals or communities where we have identified that we have caused or contributed to a negative impact. We expect our suppliers to have the same commitment.

We are prepared to collaborate with suppliers to remedy adverse impacts which are linked to our products or services through our suppliers' own mechanisms or through collaborating on the development of third party non-judicial remedies. Furthermore, we will not obstruct access to other remedies, and we are committed to collaborate in initiatives that provide access to remedy.

### 5. We expect our business partners to respect human rights within their scope:

STARK Group expects its business partners to respect human rights within their scope and take measures to promote responsible practices throughout the value chain.

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Human Rights Policy - Version 1.0 – April 2023



## Key human rights across our value chain

STARK Group is committed to uphold as a minimum:



### The right to health, safety and wellbeing

Health and safety is always a key priority for STARK Group, whether it involves our employees, customers or the communities in which our businesses operate. We aim for an accident-free workplace, and all our employees must support continuous improvements in health, safety and well-being throughout our operations.



### Non-discrimination and equality

STARK Group works to ensure equal treatment and opportunities for all employees and to advance diversity, equity and inclusion. STARK Group supports freedom of expression and does not discriminate on gender, transgender identity or other expressions, age, culture, nationality, ethnicity, physical abilities, disabilities, hidden disabilities, political and religious beliefs, sexual orientation, or other factors.



### The right to form or join a trade union and to bargain collectively

STARK Group is committed to the freedom of association and the right to collective bargaining.



### Fair compensation and wages

STARK Group pays fair wages based on market levels, performance and, where relevant, collective bargaining agreements. We expect the same of our suppliers as outlined in our Supplier Code of Conduct.



### The right not to be subject to harassment

STARK Group have zero tolerance towards bullying, harassment and discrimination and are committed to creating an inclusive culture free from these behaviours.



### Data privacy

The right to privacy, including the security of personal data is a priority for STARK Group whether it involves our employees, customers or other stakeholders.



### The right not to be subject to forced, compulsory or child labour

STARK Group do not tolerate any form of forced labour including compulsory labour, child labour, unreasonable working hours and human trafficking.

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Human Rights Policy - Version 1.0 – April 2023



# Environmental & Climate policy

## REQUIREMENTS

### STARK Group environmental principles

**1. We are committed to comply with all applicable laws and environmental regulation**  
We operate in accordance with all applicable laws and regulations.

**2. We maintain an environmental management system**  
We maintain an environmental management system and business units are certified according to ISO14001 or similar, where relevant.

**3. We transparently communicate our strategy, impacts and transition plan and have clear targets within all key environmental issues**  
An assessment of impacts, risks and opportunities is maintained in STARK Group, and STARK Group publicly reports on environmental performance in accordance with relevant reporting standards and the UN Global Compact Communication on Progress (COP).

**4. We promote continuous improvement in environmental performance**  
STARK Group will provide guidance and training to promote and support responsible environmental performance at all levels of the organization and where applicable in relation to our value chain. All businesses work to improve the accuracy and completeness of risk and materiality assessments, and data reported.

**5. We strive to reduce environmental impacts in the supply chain**  
STARK Group will work with its suppliers and customers to minimize environmental impacts in the supply chain by:

- (i) working with ethical and responsible suppliers to ensure confidence in the integrity of our supply chain and products, in alignment with the supplier due diligence procedure.
- (ii) regularly monitoring the market opportunity for environmental and climate beneficial products and services, and
- (iii) sharing any best practice already available to fast-track any market offering
- (iv) advising customers regarding responsible product choices and use

**6. We promote sustainable products**  
Where the opportunity exists, STARK Group strives to gain market share by increasing accessibility and knowledge of sustainable construction products.

By promoting sustainable products, STARK Group business units will ensure that business operations provide a positive link in the sustainable construction supply chain to support a net zero future.

## Key environmental issues

### STARK Group is committed to reduce our impact regarding:



#### Climate Change

We are committed to reducing our carbon emissions in line with the Paris agreement and to be Net Zero in 2050 at the latest. We continuously work to reduce energy consumption and to replace logistics and operational energy with low carbon and renewable sources. Furthermore, we promote energy efficiency and low carbon products and solutions to our customers.



#### Pollution

We are committed to reduce our pollution footprint to air, water and soil, through improvements of own operations and procurement of an increased percentage of eco-labeled products with minimal levels of hazardous substances.



#### Water and Marine Resources

STARK Group strives to achieve sustainable water consumption and promote products and services designed to actively reduce water consumption. STARK Group ensures that all wastewater from our own sites is treated in line with legal requirements to protect the aquatic ecosystems.



#### Biodiversity and Ecosystem

STARK Group conducts due diligence in accordance with the Responsible Timber Sourcing Policy and aims to source an increasing percentage of timber products that originate from sustainably managed forests which preserve soil health, water resources and biodiversity.

Our target is to continuously increase the percentage of FSC and PEFC-certified timber in assortment to support traceability of products and raw materials along the value chain.

STARK Group strives to assess salient impacts to biodiversity and ecosystem through our value chain and to initiate actions to reduce or mitigate impacts that may arise.



#### Resource use and Circular economy

STARK Group continuously works to reduce waste amounts and improve waste handling to eliminate waste to landfill, limit incineration and increase recycling rates.

STARK Group actively engages in partnerships to support circularity in the construction industry and to support reuse and recycling to increase the proportion of secondary materials in products and packaging.



# Sustainability Policy

## REQUIREMENTS

### STARK Group sustainability principles

#### 1. We act sustainably

We strive to integrate environmental and social sustainability into all our activities and across our value chain in line with the ten principles of the UN Global Compact. We support transparency by reporting on sustainability annually, disclosing progress within environmental, social and governance issues.

#### 2. We offer a market leading assortment of products and services

We offer a wide assortment of products to fulfil energy efficiency requirements and eco-labelled products and services to meet the growing customer focus, public procurement, and sustainable construction requirements. We focus on increasing reusability, recyclability, and the proportion of secondary materials in products.

#### 3. We offer market leading sustainability advice

We aim to be the preferred partner for sustainable construction and renovation, and we continuously upskill salespeople with relevant product knowledge within energy efficiency and sustainable alternatives. Our sustainability ambassador programme aims to support our customers in making informed decisions regarding sustainability.

#### 4. We ensure correct and efficient product documentation

We aim to deliver best-in-class product documentation to support our customers' increasing demand for environmental information regarding chemical content and product impact throughout its lifecycle. In addition, we support our customers in fulfilling sustainable procurement requests, new and emerging building regulations, and certification requirements.

#### 5. We are at the cutting edge of sustainability in the industry

We are active in sustainability networks and open to collaborating in partnerships that drive and promote sustainability and circularity – in order to continue being our customers and suppliers preferred partner.

#### 6. We strive for continuous improvements within sustainability

We strive to continuously develop and implement relevant guidelines to streamline the way we work with sustainability, both internally, and with our suppliers and contractors.

We strive for continuous improvement, and as sustainability is an area where new knowledge, legislation and technology is developing rapidly, continuous improvement is of vital importance.

## Key sustainability issues across our value chain



### Environment & Climate

We are determined to support the decarbonization of the construction industry while supporting sustainable ecosystems. We are committed to reducing our carbon emissions in line with the Paris agreement and to be Net Zero in 2050 at the latest.



### Ecosystem degradation and biodiversity loss

STARK Group is committed to support sustainable forestry and biodiverse ecosystems. By continuously increasing the percentage of FSC and PEFC certified timber in assortment, we encourage and strengthen sustainable forest management.



### Diversity, Equity and Inclusion

We support the value of equal opportunity and strive not to discriminate on gender, ethnicity, race, age, religion, sexuality or other factors throughout our value chain.



### Health and Safety

Health and safety are a key priority for STARK Group, whether it involves our employees, customers or the communities in which our companies operate. We aim to create a safe and accident-free workplace and are committed to continuous improvement in health and safety performance throughout our value chain.



### Human Rights

We are committed, across our supply chain, to respect and comply with international labour standards as defined by core conventions of the International Labour Organisation (ILO), the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.



### Bribery, corruption and anti-competitive practices

Decency is key to the way we conduct business. We have zero tolerance towards fraud, bribery, corruption and anti-competitive behaviour. Clear control processes and a confidential whistleblower system are set up to monitor and mitigate negative impacts.

# Product Integrity Policy

## Requirements

STARK Group Product Integrity Principles

### 1. We comply with national and international legislation in terms of product safety and quality

As an essential part of our obligation to bring safe and healthy products to the market we always comply with national and international product regulation. And we have in place a framework that ensures that our requirements are always aligned with both national requirements and international legislation.

We maintain a regular dialogue with regulators and industry organisations to ensure we are always updated on regulatory requirements and their implementation.

### 2. We trade only with financially healthy suppliers who subscribe to our values

As part of our commitment to source safe products we only trade with suppliers who are financially healthy and who subscribe to our values in terms of supplying the market with safe and healthy products which contributes to helping our customers build safe and healthy homes. We have in place tools and guidelines to evaluate our suppliers' financial health and their ability to engage in long term relationships with us and our customers.

### 3. We are committed to adhere to industry standards

As part of our commitment, we subscribe to industry standards in terms of quality and reliability. We stand behind the products we place on the market and if they in any way fail to perform as intended, we do our utmost to help our customers to mitigate any shortcomings.

### 4. We assess and monitor supplier ESG performance

STARK Group uses external screenings to assess and monitor supplier ESG performance as a basis for **prioritising** supplier engagement and improvement.

### 5. We are committed to take swift and immediate action to mitigate any risk

If a product turns out to not meet our quality requirements, we want to take swift action to discontinue the sale of the product until we know where the failure originated and have insurance it has been mitigated.

Further, we provide our sales and sourcing staff with training and information on relevant regulation and how to ensure the quality and documentation from our suppliers

## Supplier Code of Conduct - Innhold



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| MENNESKERETTIGHETER .....                      | 4 |
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# Code of Conduct – medarbeidere

STARK Group Etiske retningslinjer

## INNHold

### MÅTEN VI ARBEIDER PÅ

|                              |    |
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| Vår måte å gjøre business på | 8  |
| Hva vi forventer av alle     | 10 |
| Hva vi forventer av ledere   | 12 |
| Vi jobber mot bærekraft      | 13 |

### HVORDAN VI SAMARBEIDER

|                                                  |    |
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| Vi er for like rettigheter                       | 15 |
| Vi tolererer ikke mobbing                        | 16 |
| Vi bruker ikke alkohol eller narkotika på arbeid | 17 |
| Vi tilbyr trygge arbeidsforhold                  | 18 |
| Vi sikrer informasjon og respekterer privatliv   | 21 |

### HVORDAN VI HÅNTERER EKSTERNE RELASJONER

|                                        |    |
|----------------------------------------|----|
| Vi representerer alltid merkevaren vår | 23 |
| Vi ønsker konkurranse velkommen        | 24 |
| Vi må unngå interessekonflikter        | 25 |
| Vi bekjemper korrupsjon                | 26 |
| Vi ber aldri om gaver eller bevertning | 28 |
| Vi beskytter tid og verdier            | 29 |

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| SPEAK UP! | 31 |
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## Medarbeidere

Ved ansettelse i FagFlis-kjeden vil alle medarbeidere bli en del av et sentralstyrt onboardingprogram. En stor del av onboardingprogrammet omhandler verdier, visjon og kultur, og annen del mer spesifikt til den avdeling eller funksjon vedkommende skal ha. Den sentralstyrte delen har til hensikt å sikre at alle medarbeidere, uansett geografi eller funksjon, skal introduseres for de verdier selskapet er bygget på. Etiske retningslinjer er en stor del av dette, og nye medarbeidere, i liket med etablerte, må gjennomgå digitalt kurs i *Etiske Retningslinjer*, samt at det deles ut fysisk brosjyre og relevante lenker. Åpenhetsloven og dens intensjoner får en stor plass i dette onboardingprogrammet.

Som en del av vårt arbeid for å fremme anstendige arbeidsforhold og ivareta grunnleggende menneskerettigheter i tråd med åpenhetsloven, blir ansatte også gjort kjent med virksomhetens system *Speak Up*. Dette er et system for intern varsling av kritikkverdige forhold i henhold til AML kapittel 2A Varsling. Videre blir det også gjennomført årlige og månedlige medarbeiderundersøkelser. Den årlige undersøkelsen *Tell Us* kartlegger blant annet medarbeidernes engasjement, arbeidsforhold, samarbeid og oppfatning av virksomhetens omdømme. I tillegg benyttes også spørreundersøkelsen *Winningtemp* til månedlige målinger av medarbeidertilfredshet. Begge undersøkelser gir ansatte mulighet til å gi tilbakemeldinger anonymt, og varsle internt.

## Aktsomhetsvurderinger

FagFlis kjøp av importerte produkter er hovedsakelig fra produsenter i Europa, samt én i Tyrkia. Våre ti største leverandører er:

Sika Norge AS, Wedi, Pavigrés, Mirage, Kerakoll, Vitra, Cæsar, Nordic Tools, Quintessenza og Buzon. Et par av disse leverandørene omfattes selv av åpenhetsloven da de har organisasjonsnummer registrert i Norge, og utfører selv aktsomhetsvurderinger.

Kartleggingen hos disse viser blant annet:

- Ansvar for oppfølging av menneskerettigheter og anstendige arbeidsforhold er forankret i ledelsen og i styringssystemer.
- De har etablert interne etiske retningslinjer, og retningslinjer som inneholder krav og forventninger til ansvarlighet hos egne leverandører og forretningspartnere.
- De har interne prosedyrer for å kartlegge, og vurdere, faktiske og potensielle, negative konsekvenser for grunnleggende menneskerettigheter og anstendige arbeidsforhold som de selv enten har forårsaket eller bidratt til, eller som er direkte knyttet til deres forretningsvirksomhet, produkter eller tjenester.

FagFlis har utover ovennevnte vært i kontakt med ti av våre leverandører for å sikre at disse arbeider med intensjonen i åpenhetsloven, uavhengig av om de omfattes av den eller ikke.

Våre aktsomhetsvurderinger er hovedsakelig basert på spørreundersøkelser utformet av vår leverandør av juridiske tjenester. Denne spørreundersøkelsen er besvart av alle våre største leverandører av flis og flisrelaterte produkter. I tillegg er det også gjort en tredjepartsvurdering av Dun & Bradstreet på fem av våre største leverandører.

Vi har vurdert etter følgende kriterier:

- Risikobransjer
- Risikovarer
- Risikoland
- Egen erfaring

Ved en vurdering av de vesentligste leverandørene, som representerer 92,2% av vårt kjøp, fordeler det seg på ti ovennevnte leverandører.

FagFlis og STARK Group har lav risiko og har ikke avdekket noen brudd på arbeidstakerrettigheter og/eller menneskerettigheter.

## Planlagt arbeid 2025

Til tross for at vi vurderer vår generelle risiko som lav, basert på for eksempel leverandørenes geografiske plassering, er det likevel forhold vi ønsker å fordype oss ytterligere i. Vi ønsker å gå lengre ned i kjeden av underleverandørene til våre leverandører, hvor kommer delene til det sammenstilte produkt fra, hvordan produseres disse og hvordan transporteres delene til våre leverandørers produkter.

Videre ønsker vi å se nærmere på transportleddet av ferdigstilte produkter frem til oss.

FagFlis vurderer også å ta i bruk *Integrity Next* som ytterligere verktøy i *Supply chain Due Diligence*. En vurdering av dette foretas våren 2025.

Link: <https://starkgroup.dk/newsroom/publications>



**Kontaktperson:**

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**Oslo, 23. juni 2025**

A handwritten signature in black ink, appearing to read 'Henning Jansen', with a stylized, flowing script.

Henning Jansen  
Administrerende direktør