

Avonova Group

Key Steering Documents

To ensure a common best practice in the whole of Avonova Group, key steering documents are implemented on a group level to ensure that Avonova commits to hold high standards in every aspect of business and across all divisions. In addition to the group steering documents, each division implements their own policies and procedures to ensure compliance with the Group steering documents in everyday practice, as well as with any national legislation.

Top steering documents

Board instruction	Ensures sound commitment and clear responsibilities between the board and the CEO (Group Management).
Group Policies procedure	Steering document to ensure review and implementation of Group Policies throughout the organization.
Code of Conduct	Avonova's commitment to ethical and legal practices. Emphasizes ethical standards and legal compliance and is the foundation for other policies addressing, for example, ESG/CSRD and human rights.
Risk Management & compliance policy	Defines the principles and standards of risk appetite, risk management and compliance management. Is complemented by division-wide risk management and compliance procedures.

Overview of steering documents

General	Crisis Management & contingency policy Crisis Management plan	Finance	Accounting Manual Core Business & Internal Control checks <i>Anti-trust & Anti-corruption as part of Code of Conduct</i> Dawn Raid procedure Delegation Matrix Anti-money laundering procedure (for Avonova Insurance) Internal Control & Risk Management procedure (for Avonova Insurance)
HR	Compensation & Benefits policy Compensation & Benefits procedure General HR policy Car policy		
IT	Information security policy Information security procedure IT Disaster Recovery procedure IT Policy IT User procedure Email procedure Mobile device procedure	GDPR	Data Security Policy Cookie policies (per country) Privacy statements for customers, patients and employees (per country)
Sales/ Marketing	Marketing Policy	Sourcing	Sourcing policy Sourcing Procedure Supplier Code of Conduct Supplier Evaluation procedure Receiving Inspection procedure Transparency Act procedure (Norway)
ESG/ CSRD	ESG & CSRD procedure		