

Visma's Sustainability Policy



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Introduction

At Visma, we define sustainability as the commitment to economic, social, and environmental well-being through a just transition that safeguards ecological balance for present and future generations. This applies to both our operations and our value chain.

Sustainability is a shared responsibility

In Visma's role as a leading international software company, we have the opportunity to positively impact the world and drive change towards more sustainable business practices in all of our operations and value chains. As the world works towards achieving the UN's 17 Sustainable Development Goals (SDGs) and the 2030 Agenda, it is clear that there is more to be done to meet the needs of the planet and society. None of the SDGs will be achieved unless there is multilateral collaboration at all levels of society, where everyone works together towards more sustainable practices.

Sustainability is a part of business

Making a commitment towards good citizenship is not just something we want to do; it's something we need to do to stay relevant in the marketplace and in the eyes of our stakeholders. At Visma, we must work together towards an interdisciplinary application of sustainability — creating a culture where sustainable practices and decision-making are integrated throughout the organisation.

Minimising waste and the use of natural resources and energy throughout our value chains, ensuring that we are not involved in corruption or any adverse impacts on human rights, and always taking the true cost of our actions into account, are all part of sound business practices.





About this document

Scope

This policy concerns all Visma employees and all Visma companies.

The Managing Director of each Visma company is responsible for the implementation of this policy in their respective company. Newly acquired companies are expected to conform to this policy within a maximum of 12 months after becoming part of the Visma Group.

Commitment

Visma wants to be a part of the transition to a more sustainable world and we support the Sustainable Development Goals (SDGs). We commit to protecting the environment, people and society, through responsible management of our operations, by complying with or exceeding our environmental and social obligations, and by working proactively on the topics covered in this document.

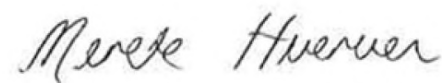
We shall take a principles-based approach to sustainability, meaning we follow high-level principles rather than prescriptive rules.

Since 2022, Visma has [committed](#) to integrating the [ten principles of the United Nations Global Compact](#) initiative as part of our strategy, culture and day-to-day operations.

It is also important to recognise the complex interactions and feedback loops that are inherent in sustainability challenges. It is therefore critical that any efforts we make to solve sustainability challenges in one area of our organisation do not create adverse impacts elsewhere.

Approval of this document

This document has been approved by Visma's CEO, Corporate Management and the Head of Sustainability.



Merete Hverven
CEO
10.11.2023



Lars Martin Ottersen
Chief Risk Officer
10.11.2023



Robin Åkerberg
Head of Sustainability
10.11.2023

Version history

Version	Description of change	Date of approval	Date of issue
1.0	Initial issue	16.4.2021	21.4.2021
1.1	UN Global Compact commitment updated	25.4.2022	20.5.2022
2.0	A complete review of the entire Visma sustainability policy, including but not limited to the following additions/changes: <ul style="list-style-type: none">• A review and update of Visma's Sustainability targets, including climate targets• Description of our double materiality process• Description of our sustainability organisation	10.11.2023	15.11.2023
2.1	Clarification of energy targets, incorrect SDG target on p. 13 corrected	10.11.2023	11.1.2024

Double materiality: understanding what's relevant to us

Materiality, in a nutshell, means relevance. Every company deals with risks and opportunities that are particularly relevant to that company. We can then say those particular risks and opportunities are “material” to us.

A topic is considered **material from a financial perspective** if it contains risks or opportunities that are likely to influence future cash flows in the short, medium or long term. A topic is considered **material from an impact perspective** if actions are likely to affect people or the environment in the short, medium or long term.

A sustainability topic meets the criteria of **double materiality** if it is material from the impact perspective or from the financial perspective or from both of these two perspectives.

Defining our balance

To define what is material and to what extent, we need to do periodic materiality assessments. Each materiality assessment is a balancing act between resources, budget and time.

Spending extensive resources on a too-detailed assessment may lead to a false sense of certainty, while insufficient resource investment may lead to inaccurate end results.

At Visma, we have defined the following balance as the basis of our assessment.



Our materiality process

We consider both direct and indirect potential impacts on our stakeholders, as well as the potential risks that each sustainability topic may impose on Visma.

Visma's double materiality assessment was conducted in collaboration between the Group Finance, Legal & Compliance, and Sustainability teams.

When conducting the assessment, the following aspects were taken into consideration:

- Visma's activities, including our product and service offering, and the geographies where activities of our business relationships take place
- Visma's business relationships, including stakeholder requests and expectations
- Visma's sustainability context, including relevant legislation, the UN Global Compact principles, and industry standards such as the Sustainability Accounting Standards Board's (SASB) materiality map for the Software & IT Services industry
- Benchmarking with industry peers and best practices

Stakeholders

To ensure that as many relevant perspectives as possible were considered when conducting the double materiality assessment, we included an expanded list of stakeholders. Among these, our most important stakeholders include:

- Employees in our [operations](#) and [value chain](#)
- [Suppliers / vendors](#)
- [Customers and end-users](#)
- Authorities/Government
- [Environment](#)
- [Owners & creditors](#)
- [Future generations](#)
- [Vulnerable groups](#)

To read more about the relevant topics for the different stakeholder groups and how we engage with them, follow the links included above.

Material topics at Visma

Following our double materiality assessment, we consider the following topics as material to Visma:

- Energy & climate
- Data security & privacy
- Working conditions, diversity, equity and inclusion
- Ethical business conduct and anti-corruption
- Human rights

The results of the assessment are reflected throughout this Sustainability policy and shall guide us in our day-to-day operations and reporting going forward.



WE SUPPORT



Circular economy practices



Human rights

Solutions to increase efficiency in society

[Learn more here](#)



Anti-corruption & ethical business conduct



Privacy, security and accessibility



Energy consumption

Sustainability at Visma entails reducing our impact, both in our operations and broader value chain. This touches on a number of important areas that are relevant to both people and the environment

ESG Software

[Read more here](#)



Reducing our climate impacts



Respecting people & embracing differences

Sustainability in our supply chains

Sustainability as part of our culture

Beyond working with sustainability in our operations, we also have a responsibility to help our customers be more sustainable. We are uniquely positioned to help them use resources more efficiently in the products and services that they create. In order to best help them, we must employ sustainability by design in our own software development, taking environmental and social aspects into consideration throughout the process.

What do we mean by sustainability by design? It can include having environmental criteria when selecting data centre providers, making our products more accessible, creating software that is as (energy) efficient as possible, and ensuring that ethical standards are followed when using AI solutions. Sustainable thinking can and should also be included in all organisational functions, as it is an essential part of our vision to shape the future of society through technology.

We also recognise that our sustainability profile will play an important part in determining whether future generations and talents want to take employment at Visma. In addition, we must take responsibility towards future generations and their right to grow up in a safe and healthy environment, free of discrimination and injustice. Reducing our environmental impacts and ensuring the fair treatment of all are key to ensure this.

At Visma, we are therefore highly active in our markets in the areas we know best: technology, recruitment, vocational training, and work life. In order to engage with younger generations, Visma offers various intern and trainee positions and programmes for young people. We also work with target schools and other organisations, promoting tech as a career path and increasing the interest of technology among women and younger generations.

We have many opportunities to communicate the benefits of our sustainability activities. Please keep in mind that any kind of greenwashing, i.e. providing a false impression or misleading information about our sustainability efforts, is prohibited at Visma. Any claims shall be supported by evidence or examples.

Learn more about [Visma's vision, mission, and values](#).



How we are organised

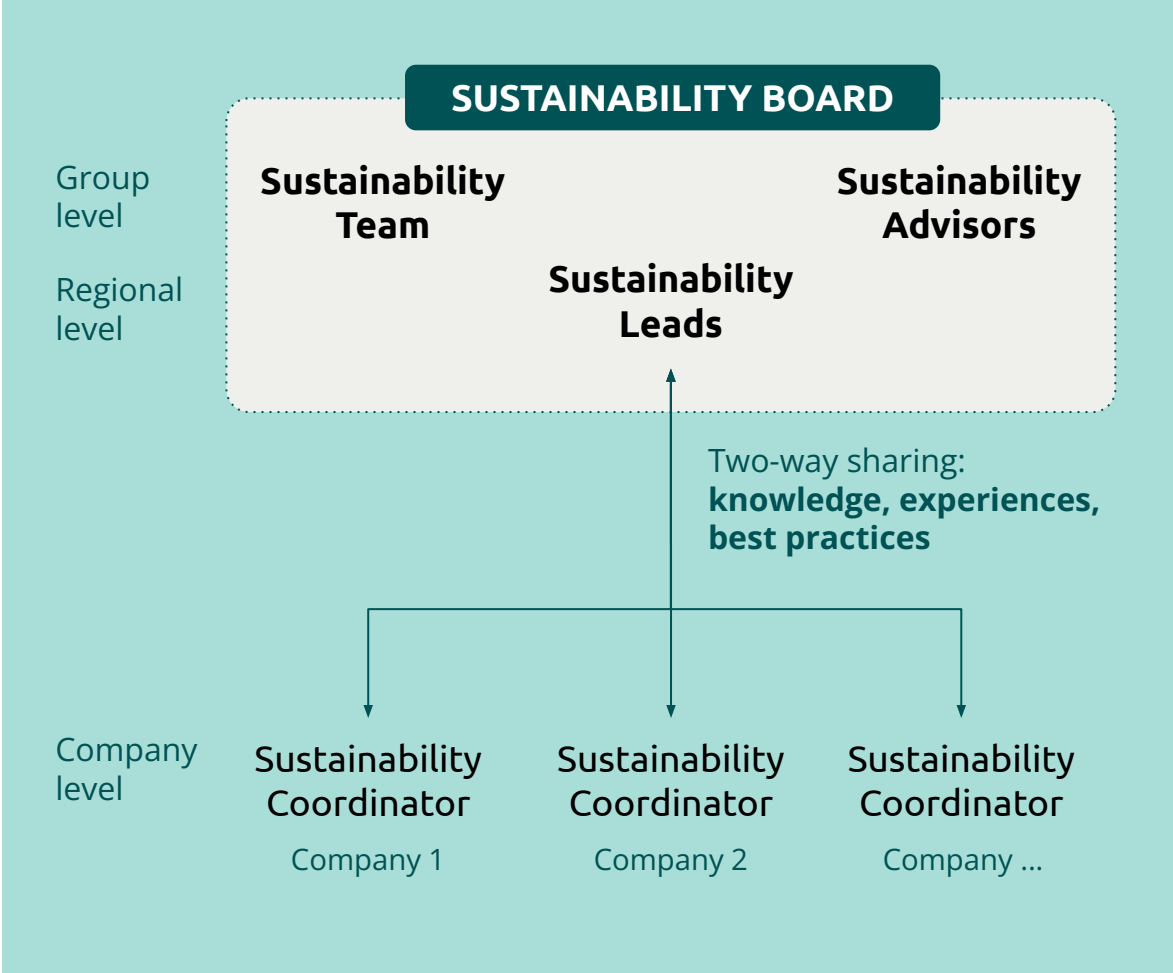
Visma is a collection of entrepreneurial companies, each accountable for their own sustainability and business performance. However, working together to achieve our targets on important topics, such as sustainability, is crucial and depends on the smooth exchange of expertise and competence. That's why we've built a sustainability organisation within Visma that encourages knowledge sharing and collaboration, and helps the otherwise autonomous Visma companies to build capacity and prioritise sustainability topics. This also allows us to have common goals and get the results we're after.

The Visma companies operate locally and therefore have particular knowledge, challenges, and best practices for sustainability. This is why it's crucial that the accountability of the sustainability performance lies with the local Visma companies, as that enables us to make changes where they matter.

We have to make it easy for everyone to improve – whether sharing information across companies or advising from the Group level.

We are organised around the environmental, social and governance (ESG) topics in a way that ensures a two-way flow of information. Each Visma company shall have a Sustainability Coordinator assigned, who acts as the company's main point of contact in sustainability related matters. Together with regional leaders called Sustainability Leads, they have regular meetings and sparring sessions. The Sustainability Leads are part of Visma's Sustainability Board, which meets at least monthly. The Sustainability Board meetings provide us with an arena to raise concerns brought up in the regional Sustainability Coordinator meetings, discuss ideas, make decisions, plan action, and provide our companies with the information and support that they need.

> Focus on local ownership to build accountability in all Visma companies



Our Environmental footprint

At Visma, we believe that protecting the environment is simply the right thing to do, as well as a sound way to conduct business. We live on a planet with finite resources and our welfare relies on the natural world and its biodiversity.

Visma believes that all businesses have a responsibility to contribute to the work against climate change and to use the world's limited resources responsibly. The transition to a low-carbon, resource-efficient and circular economy in line with the SDGs is key to ensuring long-term competitiveness.

In addition to this, all Visma employees have a responsibility to contribute to Visma's work for the environment, by following the guidelines set out in [Visma's Code of Conduct](#). We shall aim to meet or exceed stakeholder expectations regarding sustainability and take this into account in all our business decisions. By making sustainable choices, we can inspire others to follow.



Improving our energy efficiency and transitioning to renewable energy (RE)

At Visma, we want to create sustainable and energy-efficient workplaces that are good for our employees and reduce our impacts on the natural world. Minimising energy consumption through awareness and switching to renewable energy sources are crucial steps to achieve that.

Improving the energy efficiency in our operations goes hand in hand with our energy transition, and can provide Visma with direct cost reductions.

For more information about Visma's energy consumption, see our [latest sustainability report](#).

Visma's energy targets

- 80% renewable energy by end of 2025*
- 95% renewable energy by end of 2030*
- 10% lower energy consumption at the office level by 2030

* Percentage of our energy consumption covered by 100% RE contracts



SDG Target 7.3: By 2030, double the global rate of improvement in energy efficiency



SDG Target 13.1: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries



Reducing our climate impacts

Climate change is already impacting the environment and populations, and will increasingly disrupt businesses. Increased severity of extreme weather events, such as cyclones and floods, may threaten Visma's ability to operate, and increasing disclosure requirements affect both Visma and many of our stakeholders.

We have to focus our efforts where they matter most and where we can have an impact. Each Visma company shall follow the Group guidelines and requirements for reporting the necessary emissions data. In addition, Visma companies are required to define their own targets that have at least the same level of ambition as the Visma Group targets. Acquired companies should have Visma-aligned targets in place within 12 months of being acquired.

To learn more about our emissions, read our latest [sustainability report](#).



SDG target 13.2: Integrate climate change measures into national policies, strategies and planning



SDG Target 12.2: By 2030, achieve the sustainable management and efficient use of natural resources

Visma's emission reduction targets

- 50% absolute reduction of total scope 1 and market-based scope 2 emissions* by 2030 from 2022 baseline
- 50% of suppliers (by spend) have targets in line with the 1.5 degree trajectory by 2028
- 20% reduction of hardware emissions by 2030* from 2022 baseline
- 30% reduction in air, car and other business travel emissions by 2030 (or 5% annually)* compared to 2022 baseline
- Net zero by 2040

*In order to maintain consistency over time, Visma has defined the significance threshold of 5% change in FTEs, to trigger base year recalculation, in accordance with the GHG Protocol.

Circular economy practices

Managing our waste in an effective and tangible way is important to demonstrate our environmental commitments to our people and embed circular thinking in our culture.

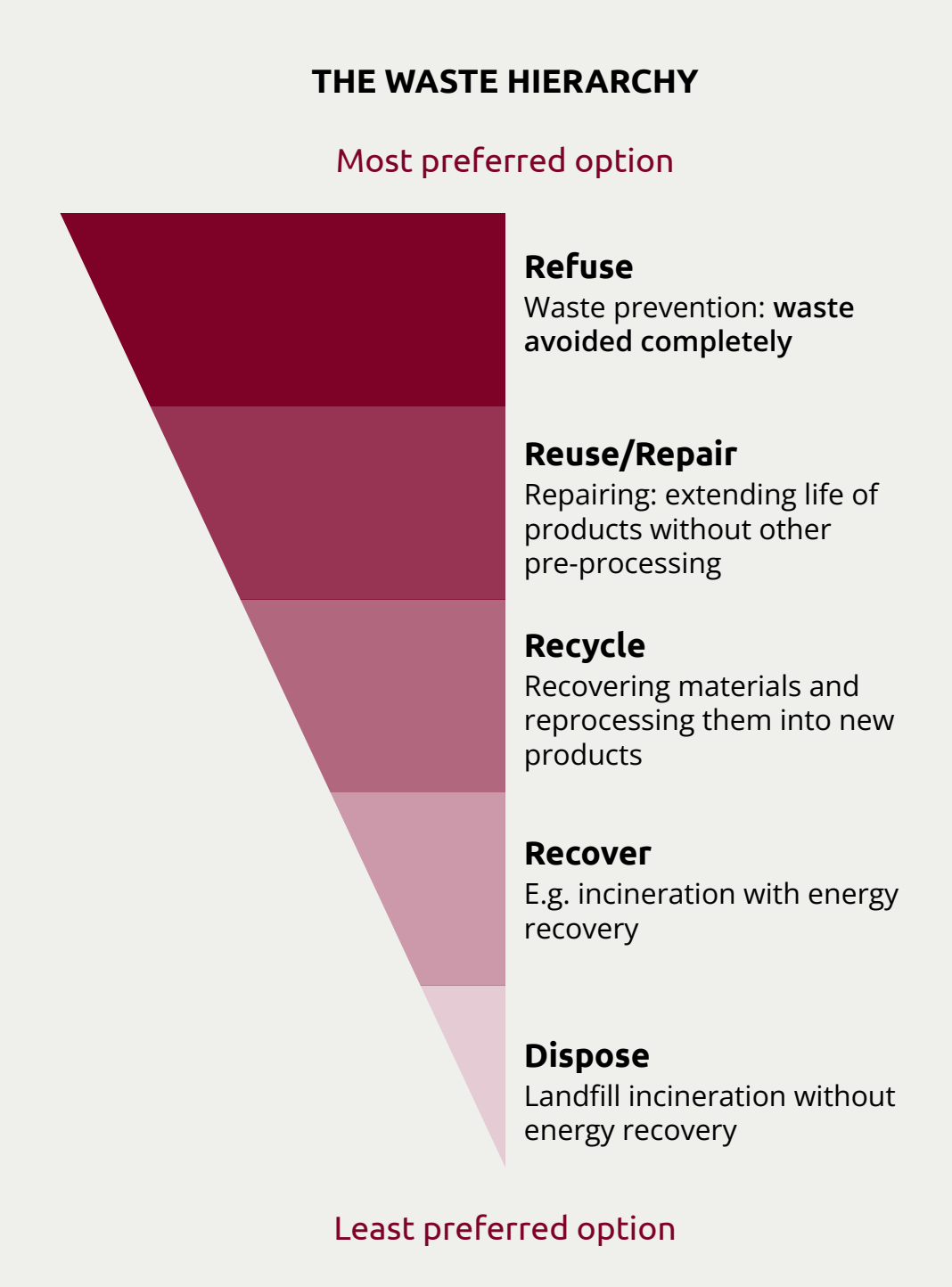
Electrical and electronic equipment comprise one of the fastest growing waste streams in the EU. As a software company, Visma's main source of physical resource use is through the use of IT hardware.

Each Visma company is responsible for minimising waste, especially electronic waste, by following the principles of the waste hierarchy. By prolonging the lifetime of hardware, such as computers, screens and phones, to the extent possible, we can significantly reduce emissions and the consumption of valuable resources. All materials are to be recycled at the end of the product life cycle.

Visma's hardware emissions target:

- 20% reduction of hardware emissions by 2030*

*In order to maintain consistency over time, Visma has defined the significance threshold of 5% change in FTEs, to trigger base year recalculation, in accordance with the GHG Protocol.



SDG Target 12.2: By 2030, achieve the sustainable management and efficient use of natural resources

SDG Target 12.4: By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment



SDG Target 6.3: By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally

Respecting people and embracing differences

We believe that it is crucial to have employees with diverse backgrounds, experiences and skills, as more varied ways of thinking can provide new and innovative insights that spark better business results.

Working with Diversity & Inclusion is primarily a business imperative, enabling us to attract, develop, inspire and retain top talents, and allowing us to develop products that meet our customers' needs. We commit to complying with all applicable employment legislation, including employee wages and working conditions, in the countries where we are present.

Visma prohibits discrimination, harassment and bullying of any form. All Visma companies shall actively work on avoiding discrimination in all of our processes and ensure that decisions are made on a fair basis. Any suspected incidents of discrimination or abuse at Visma shall be reported. Employees at Visma shall either do this by contacting their manager or manager's manager, or by using [Visma's whistleblowing channel](#).

For information regarding workers in our value chain, see the Visma [Supplier Code of Conduct](#).

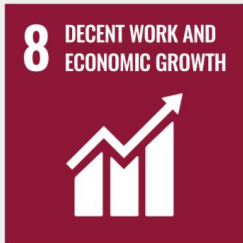


Diversity, equity & inclusion (DEI)



SDG Target 5.1: End all forms of discrimination against all women and girls everywhere

SDG Target 5.5: Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision making in political, economic and public life



SDG Target 8.5: By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value



SDG Target 10.2: By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status

SDG Target 10.3: Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard

SDG Target 10.4: Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality



SDG Target 16.12: Promote and enforce non-discriminatory laws and policies for sustainable development

We aim to improve gender balance in total and in management teams, although the primary criteria will always be to secure the right competence. This requires a continuous focus on gender balance in our recruitment processes and talent and leadership programs.

Visma’s DEI targets

- 40% gender balance in Visma Group overall, and in each company*
 - 50% gender balance in new hires per year**
- 40% gender balance in leadership positions***
 - 50% gender balance in leadership talent programs per year (e.g. Visma Management Academy)**
- Diversity & Inclusion Index score in top 5% of technology industry (Peakon benchmark)

* at least 40% of each gender (women / men) in total
 ** +/- 3% to allow for uneven number of participants, new hires or non-binary participants
 *** either with personnel or team leader responsibilities

Employee engagement & development

One of Visma's main objectives is to be the most inspiring and engaging place to work. By engaging with our employees, we aim to understand the emotional commitment they have to the company and its goals. We know that highly engaged employees approach work with energy, enthusiasm, and resilience, and serve as ambassadors outside the company. We have also found a significant positive correlation between employee engagement and product growth, especially for larger product lines.

With our monthly or bi-monthly engagement survey – each Visma company can choose which survey frequency works best for them – we continuously take the temperature of our organisation's culture. We also gather real-time data for all leaders, enabling them to quickly

adapt and make changes where and when we see a need. There are 47 questions in total and each survey consists of 10 to 18 questions, depending on the frequency.

Learning & development

Learning and development is a strong focus at Visma and we have an internal learning and development platform with the goal to provide all Visma employees with access to Group-wide learning content and development opportunities. Employees also have access to learning material, mandatory courses, and communities within different areas of interest.

Visma's employee engagement targets

- Engagement score in the top 5% of technology industry (Peakon benchmark)
- Health & Wellbeing Index score in the top 5% of technology industry (Peakon benchmark)
- Leadership Index score in the top 10% of technology industry (Peakon benchmark) and no leaders with negative leadership index for 3 consecutive months



Health, safety and wellbeing

We believe that healthy people are the best resource an organisation can have, so health and safety in the workplace are vital. Visma ensures the general welfare of employees and supports them in their work tasks, as health and safety are integrated in processes and procedures of our Management Systems. All employees are responsible for contributing to a great working environment and showing respect for each other.

Laws and industry standards for regular working hours/days, and overtime hours, including breaks, rest periods, holidays, and maternity and paternity leaves, must be followed by all Visma companies. Visma commits to paying living wages to all employees.



SDG Target 8.8: Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment

Human rights and working conditions

Visma will not tolerate any violations of internationally proclaimed human rights within the organisation or among our suppliers, partners, or other stakeholders. Internationally proclaimed human rights refer to those expressed in the Universal Declaration of Human Rights and the core principles set out in the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work. ILO categorises human rights into five main categories:

1. Freedom of association and the effective recognition of the right to collective bargaining
2. The elimination of all forms of forced or compulsory labour
3. The effective abolition of child labour
4. The elimination of discrimination in respect of employment and occupation
5. A safe and healthy working environment



SDG Target 16.2: End abuse, exploitation, trafficking and all forms of violence against and torture of children
SDG Target 16.3: Promote the rule of law at the national and international levels and ensure equal access to justice for all
SDG Target 16.10: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements
SDG Target 16.12: Promote and enforce non-discriminatory laws and policies for sustainable development



SDG Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms

Addressing human rights issues includes taking adequate measures for their prevention and mitigation. Everyone at Visma shall avoid causing or contributing to adverse human rights impacts linked to our operations, both directly or indirectly through Visma's business relationships. These measures include:

- Encouraging all employees, customers and other business partners to report any concerns related to the direct activities or supply chains of the organisation
- Ensuring that workers under the minimum age for work or mandatory schooling, as specified by local law, are not employed by Visma or by any of our business associates. When young workers are employed, they must not do work that is mentally, physically, socially or morally dangerous or harmful. The work shall not interfere with their opportunity to attend school and develop.

- Ensuring that all employees are given the right to collective bargaining, as a way for workers and employers to reach agreement on issues affecting the world of work. It builds on the freedom to association and the right of workers and employers to form and join organisations of their own choosing.
- Ensuring that Visma is not involved in modern slavery, including forced, bonded or compulsory labour, or in the trafficking of human beings. All workers shall be employed on a voluntary basis, free from any threat of violence, threats of criminal penalty, or restrictions on freedom of movement. Employees must not be required to lodge deposits, money or personal papers with Visma, and all employees shall have the right to leave their employment after reasonable notice.

Any (suspected) breaches against human rights at Visma or in our value chain shall be reported through the Visma [Whistleblowing channel](#), or through ordinary reporting lines .

For more information, see:

- [Visma's Transparency Act statement](#): An account describing our work with fundamental human rights, decent working conditions, and information regarding actual adverse impacts and significant risks of adverse impacts that we have identified through our due diligence
- [Visma's Code of Conduct](#)
- [Visma's statement on modern slavery and human trafficking](#)

Visma's target related to human rights

- Top 5% in the technology industry on the Peakon question "I'm confident I won't be discriminated against in my organisation."



Community investments, partnerships and charitable giving

At Visma, we want to shape the future of society through technology. We are stronger together, and collaboration with stakeholders is an important way to reach our goals. Partnerships for sustainability and the SDGs, local community investments, and sponsoring and supporting of projects that positively impact society and the environment are all vital. Not only can they be strong drivers of employee engagement, but also excellent ways to promote Visma. The sponsoring shall not conflict with economic stability or transparency. Visma does not engage with initiatives related to politics (directly or through trade associations), religion, offensive topics or high-risk sports. Read more about rules related to sponsorships in the [Anti-Corruption Policy](#).



SDG Target 17.16: Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the sustainable development goals in all countries, in particular developing countries

SDG Target 17.17: Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships

Ensuring privacy, security and accessibility for our customers & end-users

At Visma we want to build software that is accessible and safe for everyone. We build on industry best practices, our own research and our own high expectations to set a high standard for security. We are committed to safeguarding the data we are entrusted with by our customers, employees and contact persons.

To increase the possibilities for everyone to use Visma software, and to build a strong accessibility culture among our product teams, all Visma products should prioritise accessibility and familiarise themselves with the [Web Content Accessibility Guidelines \(WCAG\)](#) requirements.

For more information about specific products, security, privacy, the Visma Cloud Delivery Model and more, please visit our [Trust Centre](#). For information about our accessibility efforts, visit our [accessibility pages](#).

Visma's security targets

- All Visma companies onboarded to the Visma Security Program and visible on the security index
- All Visma companies have set appropriate targets for security performance with reference to the Visma security index
- 80% of employees complete the annual security e-learning*

* This e-learning is not mandatory and the Visma companies can set their own target for completion.

Visma's privacy targets

- No fines related to GDPR breach
- 80% of employees complete the annual privacy e-learning

Visma's accessibility targets

- 100% of Visma products subject to mandatory WCAG legislation shall comply with WCAG requirements
- An appointed accessibility Champion in all product organisations with software subject to mandatory WGAC legislation



SDG Target 10.2: By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status



SDG Target 16.10: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements

Ethical Business Conduct at Visma

At Visma we are all responsible for understanding the legal and ethical issues that affect our business, and for acting with integrity at all times.

We shall follow the laws and regulations of the markets in which we are active, and all Visma companies shall follow group procedures to mitigate ethical and legal risk.



Anti-corruption, antitrust and competition law

Visma has established an [Anti-Corruption Policy](#) which defines our personal responsibility and the values we shall follow.

Visma will not tolerate any form of corruption, and will make efforts to ensure that it does not occur in our business activities. We will comply with all laws and regulations, and act in an ethical and socially responsible manner. Breaches of the Anti-Corruption Policy or violation of applicable laws may result in disciplinary actions, including dismissal and reports to the relevant authorities. As a Visma employee, one must read and understand our Code of Conduct and follow the requirements brought by the Anti-Corruption Policy.

Any suspected breach of law, regulations, Visma's [Code of Conduct](#) or [Visma's Anti-Corruption Policy](#), shall be raised using the [Visma Whistleblowing channel](#). Visma investigates all reported cases related to corruption, fraud, or bribery.



SDG Target 16.3: Promote the rule of law at the national and international levels and ensure equal access to justice for all

SDG Target 16.5: Substantially reduce corruption and bribery in all their forms

SDG Target 16.6: Develop effective, accountable and transparent institutions at all levels

Visma's ethical business conduct target

- Zero incidents related to breaching Antitrust and Competition law (see [Visma's Antitrust and Competition Law Policy](#))

Visma's anti-corruption target

- 80% of employees complete the annual Anti-Corruption e-learning program

Sustainability in our supply chains

Our goal is to address environmental and social impacts during procurement planning and supplier engagement, as well as through the management of vendor relationships, including measurement and reporting. The [Visma Supplier Code of Conduct](#) outlines the principles for our suppliers and partners to conduct their business ethically and in line with our own sustainability policies. The Visma Group has a corporate procurement office and has established procedures for vendor selection, assessments, monitoring, and onboarding. As part of those procedures, we request our suppliers to confirm that they understand and comply with the ethical standards described in Visma's Supplier Code of Conduct. This allows us to actively promote fair employment, ethical sourcing, social inclusion, diversity, and equality in the supplier market.



Further information

[Code of Conduct](#)

[Annual reports](#)

[Board and owners](#)

[Sustainability at Visma](#)

[Trust Centre](#)

[Visma's Sustainability policies](#)

Email us at sustainability@visma.com

