

# **Sustainability policy**

# **Background and purpose**

CombinedX is committed to creating long-term value through sustainable development. We integrate economic, environmental, and social responsibility into our business strategy and comply with the laws and regulations established in Sweden and the EU in our reporting.

Our sustainability work is based on our sustainability promise: to use our knowledge of digitalization to make the world a little better. Sustainable development is usually described in three dimensions – environmental, social responsibility, and governance and economy – all of which must work together. This means that we aim to minimize our negative environmental impact, show respect for our own employees as well as those working for other companies in our value chain, and conduct our operations in an ethical manner.

The purpose of this policy is to establish a foundation for sustainability efforts for all companies within CombinedX, supporting our shared values and goals. Each company within CombinedX is responsible for complying with and implementing the policy and further developing it into their own sustainability work. The policy shall be followed by all companies, employees, and subcontractors to any of the companies within CombinedX.

Our policy is based on international guidelines such as Agenda 2030 and the UN Sustainable Development Goals (SDGs), the EU Corporate Sustainability Reporting Directive (CSRD), and the EU taxonomy for classifying sustainable economic activities. This policy, together with other policies in the CombinedX policy handbook, governs the Group's sustainability work.

# **Our material aspects**

The key to sustainability work that contributes to long-term value creation is understanding the world around us and stakeholders' expectations in a time of change. CombinedX's stakeholder and materiality analysis identifies the most important issues to prioritize the sustainability aspects the company should focus on. This analysis of societal changes that we and our stakeholders can influence, and be influenced by, forms the basis for how sustainability is integrated into the company's strategy and reporting.

A full double materiality analysis is conducted annually and shall include a review and necessary adjustments of the aspects resulting from the analysis.

CombinedX's first double materiality analysis in 2024, in accordance with the CSRD, shows a clear link between material sustainability issues and the demands of customers and stakeholders, as well as between the company's staff and business model.

- Attracting and retaining competent staff is crucial for CombinedX's success, described in the CSRD under "G1-16 and G1-18 Corporate Culture", "S1-8 Secure Employment", "S1-9 Work-Life Balance", "S1-11 Training"
- The requirements for cybersecurity are increasing, point "S4-14 Cybersecurity / GDPR"
- And for environmental reporting as a whole, points "E1-1 CC Adaptation", "E1-2 CC Mitigation"



# **Climate and environmental policy**

At CombinedX (CX), we want to use our knowledge in digitalization to make the world a little better, both for ourselves and future generations. Technological development and digitalization are crucial for achieving climate goals – this is where we can contribute!

The purpose of this policy is to set goals and a strategy to reduce CX's emissions and resource use – our "footprint" – and to help reduce our customers' emissions and resource use – our "handprint" – thereby helping to limit global warming to 1.5°C and contributing to an ecologically sustainable society.

# Goals

CombinedX aims to maximize our handprint, thereby actively helping customers reduce their climate impact. In addition, we aim to minimize our footprint, with the goal of becoming climate neutral by 2040. CombinedX shall also minimize its resource use and other environmental impacts. To achieve these goals, we have set the following sub-goals for the Group:

- 1. CombinedX and our subsidiaries shall maximize our handprint by harnessing the power of digitalization through our services and helping our customers reduce their climate impact.
- 2. CombinedX and our subsidiaries shall actively reduce our own environmental and climate footprint.

## Maximizing our handprint

Maximizing our handprint means reducing our customers' footprint and seizing opportunities for collaboration and partnership. To maximize the handprint, environmental aspects shall also be included when developing services and customer offerings, by:

- 1. Integrating climate benefits into current offerings by considering parameters for a climate benefit analysis:
  - What need does your solution fulfill for the customer?
  - Can the solution be made more efficient, thereby saving resources/reducing emissions?
  - Can the solution be expanded to solve more problems, also reducing emissions or improving the customer's sustainability work?
  - Can the solution be enhanced to solve the problem more deeply, saving resources and causing changes to the business model?

Such an analysis is most effective when done together with the customer but can also be used independently to think outside the box and find new, innovative, climate-smart solutions.

- 2. Collaborating with customers and suppliers to reduce their emissions and environmental impact, e.g., through optimized code efficiency and minimized energy consumption in developed systems.
- 3. Encouraging and enabling employees to collaborate with society and stakeholders to reduce impact and contribute together to climate-smart solutions.
- 4. Encouraging cooperation with partners for joint emissions reductions and smart synergies.



## Minimizing our footprint

Offices and data centers

- 1. Ensure green electricity for all offices and data centers.
- 2. Minimize electricity use through energy-efficient and automated solutions.
- 3. Each office must provide recycling and waste sorting for: plastic, cardboard, metal, glass, combustible waste. Also, food waste recycling if the premises allow.

## Travel

- Begin phasing out fully fossil-fueled cars (benefit and company cars) by choosing 100% electric cars as the first choice and hybrids (electric/fossil) as the second. As of 2021, fully fossil-fueled cars shall not be ordered.
- 2. For business travel, trains or buses shall be the primary choice (only fly if time savings are significant or the situation requires it to be approved by a manager).
- 3. Encourage digital meetings if the journey cannot be fossil-free. Exceptions only if a physical meeting is required by the customer or situation.
- 4. Actively encourage employees to cycle, walk, or use public transport to the workplace.

#### Resource efficiency & E-waste

- 1. Promote conscious consumption (reduce, reuse, recycle) and aim to reduce the company's electronic waste by partnering with certified e-waste handlers for responsible recycling and extending the lifespan of IT equipment and reuse.
- 2. Before purchasing a new computer or mobile device, a needs analysis must be done (reduce), based on two questions:
  - 1. Is your current phone/computer broken?
  - 2. Is it essential for you to perform your job well?
    - If **NO** to both: purchase needs further justification.
    - If YES to either: the purchase is approved based on the needs analysis.
- 3. Choose climate-smart, environmentally friendly technology and eco-labeled products.
- 4. Recycle used technical equipment by donating it to a better cause or, as a last resort, to the manufacturer for material recycling (reuse, recycle).
- 5. Collaborate with sustainable cloud providers using climate-neutral infrastructure.

From 2026, we will report according to the Task Force on Climate-related Financial Disclosures (TCFD), a guiding framework that informs CSRD and identifies sustainable IT services under the EU taxonomy.



# Social responsibility

Our employees are our most important resource. Our HR policy includes several sub-policies describing how the Group addresses various areas concerning employees and subcontractors. Examples include the Diversity and Equality Policy, the Policy Against Harassment, the Whistleblower Policy, etc. It is also important that we protect our information assets and the integrity of our employees and customers.

## Goals

As IT consultants, we handle sensitive data and must ensure the highest level of cybersecurity and ethics. CombinedX strives for a work environment where innovation, inclusion, and well-being are central. Our main goals are:

#### Diversity & equality

We aim to run an organization characterized by diversity and equality. CombinedX strives to increase equality at all levels, with a balanced gender distribution, aiming for at least 40% women and 40% men.

#### eNPS

CombinedX measures the Employee Net Promoter Score (eNPS) annually, with the goal of achieving a result of at least 60 – a level we believe is reached when employees feel the Group adheres to the policy handbook guidelines.

## Skills development through education and certification

CombinedX aims to consist of employees with specialist expertise. All employees are expected to complete various trainings available on our personnel platform, including policy training. Additionally, all employees are expected to take responsibility for their own skills development and continuously train in their area of expertise.

#### Work environment & health

CombinedX aims to maintain low levels of sick leave. Our policy is to support flexible work models and hybrid workplaces to enable work-life balance.

#### Ethical AI & data protection

We comply with EU AI legislation and ensure that our AI development is ethical and transparent. We are fully GDPR-compliant and adhere to our AI policy.

# Governance and economic responsibility

All companies play a crucial role in promoting sustainable development by delivering valuecreating services to customers and by creating jobs and tax revenues for society. That is how welfare is built. Only companies with sound growth and profitability can take on this responsibility over time. Sustainable growth and profitability must not come at the expense of environmental or social responsibilities, nor through unethical business practices or corruption.

# Ethical AI & data protection

We comply with EU AI legislation and ensure that our AI development is ethical and transparent. We are fully GDPR-compliant and follow our AI policy.

#### Goals

As IT consultants, we handle sensitive data and must ensure the highest standards of cybersecurity and ethics. CombinedX's policy is to be a good corporate citizen and comply with laws and regulations. The policy handbook includes, for example, a policy against bribery and corruption, a human rights policy, a procurement policy, etc.



#### Anti-corruption & business ethics

We have zero tolerance for bribery, corruption, and conflicts of interest. Suppliers must adhere to our Code of Conduct and will be reviewed annually based on our sustainability goals.

#### Responsible IT services

We ensure our services are not used for surveillance, discrimination, or violations of human rights.

#### Sustainable growth and profitability

CombinedX takes financial responsibility and works for long-term sustainable business. This is continuously monitored and based on the Group's financial goals in strategic planning.

## Implementation and communication

It is the responsibility of the management team in each company within CombinedX to comply with this policy. Communication of the work shall take place internally as part of quarterly meetings, in the Group's internal communication channels, and externally via press releases.

Communication should be straightforward, honest, and humble. The work shall also be communicated through an annual sustainability report starting in 2022.

This policy shall be implemented and communicated throughout the Group. All employees shall be familiar with the Group's Sustainability Policy and climate and environmental goals. Upon request, customers shall receive verbal or written information about the Group's ongoing sustainability efforts. A continuous dialogue shall be maintained with suppliers regarding climate and environmental improvement measures.

# **Review and compliance**

The Group's sustainability work shall be regularly reviewed to ensure it is conducted in accordance with the policy. The policy shall be reviewed at least annually, and the results compiled as part of the Group's sustainability report, which is published annually and forms the basis for the review of this policy.

Our sustainability report is published annually and follows:

- CSRD for comprehensive sustainability reporting
- TCFD for climate-related information
- From 2026, the EU taxonomy to identify sustainable digital services

The EU Corporate Sustainability Reporting Directive (CSRD) sets out how sustainability reporting shall be structured from the annual report for 2025 onwards. From the 2025 sustainability report and forward, the review by an auditor shall be carried out.