

ESG QUESTIONNAIRE

VESTUM

ESG Questionnaire

1.1. GENERAL INDUSTRY

Please list the industry's three biggest sustainability related challenges

- **Working environment in terms of health & safety**
- **Climate change**
- **Corporate governance (including business ethics)**

How does Vestum compare to industry peers regarding sustainability initiatives? Above, on par, or below?

Vestum is a young company in comparison with its peers. Sustainability is however an important issue for Vestum and Vestum's ambition is to be on par with its peers within a year.

Is Vestum a signatory of the UN Global Compact or Science Based Targets, report to the CDP or engaged in any other relevant sustainability initiatives?

At the moment, Vestum is not a signatory. Different sustainability initiatives are under consideration.

1.2. ENVIRONMENT

Please list, if any, Vestum's climate related opportunities

- **Acquire Taxonomy-aligned companies**
- **Climate demand on subcontractors**

Please list Vestum's three primary risks related to climate change

- **Transition market risk, i.e. a shift in demand for certain products or services**
- **Legal risk, i.e. if companies within the group do not transit fast enough**
- **Reputational risk, i.e. if companies within the group fail to make the necessary transition**

Does Vestum anticipate any climate related investments?

Vestum anticipate climate related investments, including hiring a Head of Sustainability.

Does Vestum rely on any scarce resources for its operations? If so, what efforts are made to mitigate the risk of those resources becoming even more scarce in the future, e.g. recycling,

reusing, substitutes or improved resource efficiency?

No, not as a group.

Transition related risks (for example changed customer preferences or legislation): Does Vestum anticipate any risks or opportunities due to the transition to a carbon neutral society? Is there any risk of Vestum's offering being negatively affected? If yes, is Vestum well positioned to handle that risk?

Vestum see opportunities to acquire companies that offer, or have the potential to offer, products and services that contribute to climate change mitigation or adaptation.

Vestum does not anticipate any material risks due to the transition to a carbon neutral society.

Please list Vestum's (1-2) primary means of making a positive environmental impact or minimising negative environmental impact. (If applicable, please list the corresponding most relevant UN Sustainable Development Goals). How are they tracked and communicated?

As mentioned Vestum is a young company, and the primary means of making a positive environmental impact are under consideration on a group level.

1.3. SOCIAL

Does Vestum have a history of accidents? If so, how have these been managed? Are there any preventive measures, such as policies?

Although Vestum works preventively with safety issues, accidents have occurred within the group. All accidents are reported and investigated according to applicable policies.

Does Vestum conduct any other community engagement activities aside from those directly connected to the business?

Many of Vestum's companies sponsor various activities in their communities (primarily local sport teams).

Circular economy: How are purchases and waste managed? Please list Vestum's demands on its suppliers, if applicable.

As mentioned Vestum is a young company, and issues regarding circular economy are under consideration on a group level. Regarding demands on Vestum's suppliers, please see below.

Are there any goals, policies, or Codes of conduct applicable to Vestum's suppliers? How often does Vestum conduct audits of its suppliers?

Some companies within the group have codes applicable to suppliers but Vestum will evaluate the possibility to establish a group wide code (including audits).

1.4. GOVERNANCE

Do all staff members receive continuous training on anti-corruption? Is there an external whistle-blower function? Are there any ongoing or historical incidents involving corruption, cartels or any other unethical business conduct? Have any preventive measures been taken?

There are no ongoing or historical incidents involving corruption, cartels or any other unethical business conduct.

Vestum is evaluating external whistle-blower functions.

Vestum is planning anti-corruption training for relevant employees, including management, procurement and sales.

Please state Vestum's business tax residence (i.e. where Vestum pays tax) and explain why that specific tax residence was chosen.

Vestum is a Swedish limited company that is tax resident only in Sweden.

Are there independent members of the Board of Directors?

Yes, one out of four.

Please state if and to what extent, Vestum has transactions with related parties?

All material transactions with related parties are disclosed in Vestum's financial reports.

Is the remuneration of the CEO and other members of the management team in line with industry peers? Which KPIs dictate the remuneration (particularly if sustainability and gender diversity are included)?

Remuneration of the CEO and other members of management consists of a fixed salary and standard benefits (including pension). The remuneration does not exceed that of relevant peers.

Please indicate the relative split of men/women at every level of Vestum, particularly the Board of Directors and management team.

**Board of Directors – 4 men, 0 women
Management team – 5 men, 0 women**

Is the Head of Sustainability a member of the management team? If not, who does that person report to?

A Head of Sustainability has not yet been appointed.

Policies or agreements in place?

Code of conduct	Yes
Code of conduct for suppliers	Yes (see 1.3)
Diversity policy	Yes
Anti-corruption policy	Yes

The policies listed above are currently subject to review.