

AXACTOR

# 1200 Environmental policy

09.12.2025

Approved by the Axactor Board

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## **1. Purpose**

Axactor is committed to reducing our environmental footprint to limit the effects of climate change and to preserve the environment. Axactor believes continuous improvement of environmental performance in all parts of its operations is a prerequisite for sound business development. Environmental considerations shall be a part of the daily operations, by the contribution of all employees.

This Environmental policy addresses how Axactor shall manage and control environmental issues in its entire value chain.

## **2. Target group**

This policy, related procedures and supporting documents applies to all Directors of the Board, employees, including temporary employees, legal entities within the Axactor Group and where applicable to consultants and subcontractors, pursuant to the Axactor Corporate Governance policy.

## **3. Governing principles**

### **3.1 Environmental strategy**

Axactor shall have a cautious and conscious approach to its environmental impact and define criteria, and goals for improvement, regarding environmental aspects and obligations. These criteria shall be identified, measured on, and documented through continuous transparent and verifiable reporting. The defined criteria shall be reviewed regularly and always remain compliant with best practice and improve to always meet the changing expectations of society, investors, partners, and customers.

### **3.2 Environmental risk assessment**

**3.3 Environmental risks and opportunities shall be identified, assessed, and documented through Axactor's risk management system. High risks shall be mitigated through the ordinary risk management process, and opportunities should be elevated to the executive management for further evaluation. Axactor shall prevent pollution and continuously improve its environmental management system. An environmental risk assessment shall be conducted and updated regularly. Compliance to laws & regulations**

Axactor shall as a minimum comply with mandatory environmental laws and regulations in the countries that it operates, including approved codes of practice.

Executive managers are responsible for ensuring compliance with environmental laws and obligations and shall raise awareness, encourage participation and train employees in environmental matters to improve their awareness and to always become more environmentally responsible.

### **3.4 Paper consumption and paper recycling**

Axactor shall reduce the consumption of paper by promoting electronic communication.

Axactor shall have in place routines to limit printing and all printers should be configured to print two-sided, in black and white and secured with personal access cards by default. All offices shall have a system for paper recycling.

Axactor shall be at the forefront of offering digital services for debtors in all countries, which reduces the overall need for use of paper. Axactor shall encourage all debtors to use these services.

### **3.5 Energy consumption**

All Axactor offices shall operate at the lowest possible energy consumption level and only use energy from renewable sources, insofar as possible.

Axactor offices shall have systems for time-regulated monitoring of ventilation, heating/cooling and lighting. Any reconstruction of current offices or relocation to new offices shall not lead to higher energy consumption.

### 3.6 Emissions from company cars

Company cars shall meet strict emission limits as a contribution to environmental sustainability. Axactor shall reduce the average emissions of CO2 from company cars in line with EU standards. Diesel-powered company cars shall have emission particle filters installed.

Axactor strongly promotes the choice of low and zero-emission vehicles, as part of the global greenhouse gas reduction program. It is mandatory to select a model/specification that is «top half» in their class in terms of consumption/range (WLTP), and it shall be particularly encouraged to choose an electrical vehicle.

### 3.7 General waste handling

The general waste hierarchy for Axactor is to first to **REDUCE** it at source. Axactor shall only buy necessary items and remain conscientious about the environmental impact of procurement. To the extent possible Axactor shall only chose vendors and suppliers that are environmentally friendly.

Axactor shall focus on **REUSE** of items that are possible to reuse. Axactor shall ensure that vendors have the possibility to support this principle.

Items that are not possible to reuse shall be **RECYCLED**. All offices shall have recycling of paper and a system for sorting the waste to secure proper handling.

### 3.8 IT waste handling

The general objective for IT waste handling is to minimize the amount of waste and improved treatment of waste by e.g., sorting, recycling and/or re-use. All Axactor locations shall have a system for recycling or ensured environmentally friendly destruction of used electronic office equipment (PCs, printers, mobile phones etc.).

Axactor shall preferably use approved IT contractors that have ISO-certified processes 9001 Quality, 14001 for Environmental, and 27001 for Security, or similar standards.

### 3.9 Travel

Employees shall avoid unnecessary travel and rather use video- and telephone conferences. All travels funded by Axactor shall comply with the Group travel procedure.

Axactor shall facilitate use of videoconferencing, MS Teams or/and web-based videoconferencing. These facilities shall be available in all Axactor offices, and employees shall be encouraged to use these rather than travel, where possible.

To reduce the impacts of employees' transportation, employees shall be encouraged to use public transportation, or other environmentally friendly means when travelling to and from the office.

### 3.10 Procurement and suppliers

The purchase functions are set up to minimize purchase of new equipment and promote products/items that can be mended, reused or recycled. Through the Supplier Code of Conduct, Axactor solidifies their suppliers' commitment to environmental issues.

## 4. Supporting procedures and documents

- Group travel procedure
- Company car procedure

### Review log

| Version | Date     | Changed by     | Comments   |
|---------|----------|----------------|--|
| 1.0     | 12.12.18 | HR director    |  |
| 2.0     | 12.12.19 | HR director    | Board approval. Strengthened environmental requirements  |
| 3.0     | 15.12.20 | Chief of Staff | Board approval   |
| 4.0     | 15.12.21 | Chief of Staff | Board approval. Strengthened environmental requirements. |
| 5.0     | 15.12.22 | Chief of Staff | Minor clarifications                                     |
| 6.0     | 14.12.23 | Chief of Staff | No changes   |
| 7.0     | 12.12.24 | Chief of Staff | No changes   |
| 8.0     | 09.12.25 | Chief of Staff | Minor changes to align with DMA and CSRD reporting       |