

Report 2022

ACCORDING TO

Corporate
Sustainability
Reporting
Directive



FORMUE

Although Formue is not legally obliged to prepare a CSRD report until 2025, we have chosen to produce a 2022 report to prepare for the upcoming reporting requirements.

The process has proved valuable for us, both to highlight strengths and what we already have in place, but also to reveal areas where we need to improve, in particular:

- The inclusion of CSRD reporting around Scope 3, Category 15 “Financed emissions”
- A more complete double-materiality analysis assessment, including any related further KPIs for future reporting.
- Greater disclosure around how sustainability (specifically climate risk) is factored into our strategy and investment process.

The latter will be partly covered by our TCFD report, due later in 2023, but should also be a core element of CSRD.

General Disclosures

Basis for preparation

BP-1 - General basis for preparation of the sustainability statements

The sustainability statements provide consolidated data for the Formue group, including all offices in Norway and Sweden. The scope of consolidation is the same as for the financial statements and no subsidiary undertakings are exempt from annual or consolidated sustainability reporting.

Formue is required to report in compliance with CSRD starting from the 2025 financial year, to be reported in 2026. However, CSRD reporting will still be completed for the years leading up to mandatory reporting for internal use, training and basis for improvement. Consequently, the 2022 report is not intended as an official report to be published or shared externally.

As a double materiality analysis has not been conducted prior to the 2022 report, the scopes of the statements are fully focused on cross-cutting standards in addition to topical standards E1, S1 and G1. The remaining standards and disclosures will be covered in future reports if

they are considered relevant based on the results of a thorough double materiality analysis.

The extent of the sustainability statements are mainly own operations with plans to gradually include both upstream and downstream activities in the value chain in future reporting. There are no incidents of specific information being omitted to protect intellectual property or innovation.

BP 2 – Disclosures in relation to specific circumstances

Time horizons are applied to all disclosures as described in ESRS 1 section 6.4 Definition of short-, medium-, and long-term for reporting purposes:

- Short-term time horizon equal to the reporting period used in financial statements.
- Medium-term time horizon from the end of the short-term reporting period above and up to five years.
- Long-term horizon of more than five years.

Governance

GOV 1

The role of the administrative, management and supervisory bodies.

The board of the group parent company Formue AS consists of 7 members. All are non-executives and there is no employee representation. Four members from large owners and three independents, however with minor shareholdings. Two out of seven board members are women, i.e., 29%. All members are European: three Norwegian, two Swedish, one Danish, and one

British. Four members have +30 years' experience from the wealth management industry covering all aspects of Formue operations, the other three have +10 years of experience from investments. Diverse educational backgrounds. Formue does not record data on race, sexual orientation, handicaps, political orientation or similar.

The two regulated subsidiary boards Formue

Norge AS and Formue Sverige AB have 17% and 40% female representation, with 50% and 40% non-executives. All Norwegian and Swedish, with long experience and varied background concentrated on the wealth management industry.

The unregulated subsidiary boards consist mainly of executives, and with a higher degree of males.

Formue has two committees, both consisting of non-executives only, and with 33% female representation:

- Compensation committee, overseeing adherence to regulatory requirements and internal compensation policies.
- Audit committee, overseeing the accounting and finance framework but more importantly the internal control setup, including operational line embedded internal control, the compliance & risk function and the internal audit function. The audit committee pays special attention to the overwhelming and partially conflicting sustainability regulatory requirements and the impacts, risks and opportunities of environmental matters.

Formue has a C-level executive team of nine people, headed by the CEO, that manages the company and its daily operations. Individual executives are appointed for AML and GDPR oversight responsibilities. All team members are males with 10 - 30 years of experience in the wealth management industry, partially with additional background from other industries, and a diverse educational background.

The wider management group of approximately 90 members consists of 42% females and a wide variety of educational and professional backgrounds.

Formue has approximately 100 committees

and permanent working groups reflecting the tightly woven and integrated company. One is the Sustainability committee reporting directly to the executive team, and with sub-committees for operations and advisory / investments. Two designated individuals with significant sustainability experience chair these committees.

One important role for the Compliance & Risk function is regulatory oversight, including keeping abreast of regulatory development and status. This is reported through the quarterly C&R report and ad hoc reporting to the audit committee, the group board and regulated companies' boards, the executive team and the wider management group, in addition to department-specific training and information and training to the whole company.

GOV 2

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Covered in GOV 1

GOV 3

Integration of sustainability-related performance in incentive schemes

Beyond employee stock ownership, Formue does not have incentive schemes.

GOV 4

Integration of sustainability strategies and performance in incentive schemes

Beyond employee stock ownership, Formue does not have incentive schemes.

GOV 5

Main features of risk management and internal control system in relation to the sustainability reporting process

Formue is committed to maintaining a strong

risk management and internal control system in relation to our sustainability reporting processes. The objective is to provide transparency and understanding of our risk management and internal control processes in relation to sustainability reporting.

The scope of our risk management and internal control processes and systems in relation to sustainability reporting refers to the extent of our policies, procedures, and controls designed to ensure the accuracy and completeness of our sustainability reporting. This includes the identification and assessment of risks associated with sustainability reporting, and the implementation of controls to prevent or mitigate those risks.

With sustainability reporting being a new regulatory area, the focus of risk management has been focused on understanding the regulatory requirements to ensure compliance. Using Formue's approach to managing operational risk we aim at putting these elements in place during the next year to encompass sustainability reporting:

1. Identification of Risks and Risk Assessment:

This includes identifying potential risks related to financial reporting, environmental impact, social impact, and governance. Further assessing the likelihood and impact of each risk in Formue's risk management system Synergi.

2. Risk Response:

After the risks have been assessed, the next step is to determine the appropriate response. This may include implementing controls to mitigate the risk, transferring the risk to another party, or accepting the risk.

3. Monitoring and Review:

The final step in the risk management and internal control process is to monitor and review the effectiveness of the controls implemented.

This helps to ensure that risks are being managed effectively and that any new risks are identified and addressed.

4. Governance and Culture:

This component ensures that the organization has a strong culture of risk management and that the board of directors and senior management are committed to effective risk management.

5. Information and Communication:

This component ensures that the organization has accurate and reliable information to support decision-making and that stakeholders are informed about the organization's sustainability performance.

6. Monitoring and Review:

This component involves monitoring and reviewing the effectiveness of the controls implemented and making adjustments as necessary.

Strategy

SBM 1 - Description of the processes to identify material sustainability impacts, risks, and opportunities

Formue's 386 employees as of 31.12.2022 are spread across the Nordics with 75 in Sweden and 311 in Norway. In 2023, the Danish organization will grow from 0 to 12 employees.

All 1004 MNOK revenues comes from Financial Life Management, with 139 MNOK in Sweden and 865 in Norway.

Environmental

E1 Climate change

E1-1 – Transition plan for climate change mitigation

GHG emissions targets for medium term horizon consists of a 60% reduction in operational emissions by 2025 from 2022 baseline and 65% reduction by 2027, including scope 1 & 2 in addition to categories 1-14 for scope 3. For category 15 – Investments, Formue commits to have approved science-based targets in 45% of its listed equity and bonds by 2028 from 23% in the base year 2022. Formue's portfolio targets cover 65% of its total investment and lending activities by NOK market value.

Activities to reduce operational carbon emissions on a medium time horizon include:

- Phase out all non-electric company cars by 2024
- Purchase certificates of origin for electricity in all offices in Norway, Sweden, and Denmark
- Create strategy for energy-efficiency project on Oslo Office
- Revise hardware strategy when onboarding new employees
- Market analysis for low-emissions hardware (refurbished, compensated products etc.)
- Ensure suppliers of datacenters have a 100% renewable energy target by 2025
- Reduce volume of purchased new furniture
- Develop regional travel targets and update group travel policy

E1-2 - Policies implemented to manage climate change mitigation and adaption

Formue has adopted an official company sustainability policy that provides a description of the overall ambition, work, and development within sustainability. The policy covers insight and awareness about climate change mitigation, adaptation, and transition by setting targets and guidelines in relation to the customer's carbon footprint, impact from portfolios and Formue's operational emissions. The main purpose of the policy is to ensure Formue's sustainability goals are reached as set by management and the board. The policy does not cover topics related to energy efficiency and renewable energy deployment.

E1-3 - Actions and resources in relation to climate change policies

Formue has set 2022 as baseline for estimation of CO2 emissions for the consolidated group with significant effort towards calculating relevant scope 3 categories. In addition, established a sustainability committee to align Formue's sustainability strategy across its investment portfolio, operations and supply chain and advisory services for clients.

Planned actions:

Medium-term, implement measures to drastically reduce emissions to achieve net carbon neutrality by 2025 in all operational areas and activities in the value chain. Expected reduction of GHG emissions from baseline year is 60% by 2025 and 65% by 2027. Activities to reduce operational carbon emissions on a medium time horizon include:

- Phase out all non-electric company cars by 2024 - 18,4 t CO₂e reduction
- Purchase certificates of origin for electricity in all offices in Norway, Sweden, and Denmark and create strategy for energy-efficiency project in Oslo office - 111,6 t CO₂e reduction
- Market analysis for low-emissions hardware (refurbished, compensated products etc) and revise hardware strategy when onboarding new employees - 120,29 t CO₂e reduction
- Ensure suppliers of datacenters have a 100% renewable energy target by 2025 – 20,4 t CO₂e reduction
- Reduce volume of purchased new furniture – 25,8 t CO₂e reduction
- Develop regional travel targets and update group travel policy – 45,69 t CO₂e reduction

E1-4 – Targets related to climate change mitigation and adaptation

GHG emissions targets for medium term horizon consists of a 60% reduction in operational emissions by 2025 from 2022 baseline and 65% reduction by 2027, including scope 1 & 2 in addition to categories 1-14 for scope 3. Scope 2 emissions targets are market based.

For category 15 – Investments, Formue commits to having approved science-based targets in 45% of its listed equity and bonds by 2028 from 23% in the base year 2022. Formue's portfolio targets cover 65% of its total investment and lending activities by NOK market value.

Emissions t CO₂e by scope in base year 2022, target year 2027 and reduction targets for operational emissions:

	Baseline (2022)	Target year (2027)	Reduction CO ₂ e	Reduction %
Scope 1	18,41	0,00	-18,41	100%
Scope 2	115,62	5,00	-115,62	95,67%
Scope 3	619,25	260,00	-359,25	58,01%
Total	753,27	265,00	-488,27	64,82%

Formue has not set any hard targets for emissions reductions beyond 2027 but it has committed to Net Zero by 2050 according to SBTi guidelines (i.e. including all scope 3 with limited offsets). Our ultimate goal is to be Paris Aligned, that is to say within 1.5 degrees of warming.

E1-5 – Energy consumption and mix

The total energy consumption for the group was 1244,24 MWh in 2022 for scope 1 and 2 emissions. A turnover of 1 004 MNOK in 2022 gives an energy intensity 1,24 MWh per MNOK.

The following table divides the sources of energy consumption into the different categories of renewable and non-renewable from scope 1 and 2. Conversion from liquid fuel and gas to MWh in scope 1 was done through the method described by Carbon Disclosure Project in [CDP Technical Note: Conversion of fuel data to MWh](#)

Energy consumption and mix	2022
Fuel consumption from coal and coal products (MWh)	0,00
Fuel consumption from crude oil and petroleum products (MWh)	75,85
Fuel consumption from natural gas (MWh)	6,76
Fuel consumption from other non-renewable sources (MWh)	0,00
Consumption from nuclear products (MWh)	0,00
Consumption of purchased or acquired electricity, heat, steam, and cooling from non-renewable sources (MWh)	429,21
Total non-renewable energy consumption (MWh)	511,82
Share of non-renewable sources in total energy consumption (%)	41,13
Fuel consumption for renewable sources (including biomass, biogas, non-fossil fuel waste, renewable hydrogen, etc.) (MWh)	0,00
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	732,42
The consumption of self-generated non-fuel renewable energy (MWh)	0,00
Total renewable energy consumption (MWh)	732,42
Share of renewable sources in total energy consumption (%)	58,87
Total energy consumption (MWh)	1244,24

E1-6 – Gross Scope 1, 2, 3 and Total GHG emissions

Approximation has been used to estimate scope 2 and scope 3 – cat. 5 emissions from offices that were not able to disclose this information. In addition, an approximation was used to determine emissions from employee commuting in Sweden due to difficulties collecting specific emission factors for public transportation.

London office excluded from report because of immaterial size and will be closed from 2023. Plans to reduce missing or insufficient data include increased effort in ensuring all office locations have lessors complying with data requests, in addition to acquiring better processes for data gathering from business travel. Scope 3 reporting currently not covering impact of investments.



	Baseline 2022	Target 2025	Target 2027
SCOPE 1 GHG emissions (tCO₂e)			
Fuel consumption from leased company vehicles	18,41	0,00	0,00
SCOPE 2 GHG emissions (tCO₂e)			
Gross location-based scope 2 emissions (Electricity)	18,25	18,25	18,25
Gross market-based scope 2 emissions (Electricity)	115,62	5,00	5,00
SCOPE 3 GHG emissions (tCO₂e)			
Category 1: Purchased good and services (Datacenters)	20,39	5,00	0,00
Category 1: Purchased good and services (IT Hardware)	201,29	84,00	81,00
Category 1: Purchased good and services (Office furniture)	35,75	15,00	10,00
Category 1: Purchased good and services (Oslo canteen)	40,10	28,00	28,00
Category 5: Waste generated in operations	0,91	1,00	1,00
Category 6: Business travel (Air travel)	181,70	78,00	60,00
Category 6: Business travel (Hotel stays)	1,92	2,00	2,00
Category 6: Business travel (Employee mileage)	26,50	13,00	13,00
Category 6: Business travel (Employee commuting)	110,69	73,00	65,00
Total GHG Emissions (tCO₂e)			
Total GHG Emissions – Location-based (tCO₂e)	655,90	317,25	278,25
Total GHG Emissions – Market-based (tCO₂e)	753,27	304,00	265,00
GHG intensity per net turnover			
Total GHG emissions (location-based) per net turnover (tCO₂e/MNOK)	0,65		
Total GHG emissions (market-based) per net turnover (tCO₂e/MNOK)	0,75		

Net revenue of 1 004 MNOK as per 31.12.2022 financial statement

E1-7 – GHG removals and GHG mitigation projects financed through carbon credits

No GHG removals and/or GHG mitigation projects financed through carbon credits in the reporting period. However, planned purchase of carbon credits is expected to cancel roughly 304 t CO₂e by 2025 and 265 t CO₂e by 2027

E1-8 – Internal carbon pricing

Formue does not apply any internal carbon pricing schemes in the reporting period.

E1-9 – Potential financial effects from material physical risks

As part of our reporting under TCFD in the third quarter of 2023 we will have more precise data about financial risks to the business, notably the Climate VAR for our financed emissions which comprise the bulk of our potential exposure.

Given our transition-focused investment strategy, we would hope to reduce risks to the portfolio over the longer-term, with 100% of the portfolio companies with approved Science based targets (aligned to 1.5 degrees of warming) by 2040.

Social

S1 Own Workforce

S1-1 – Policies related to own workforce

Policies related to Formue’s own workforce are compiled in the personnel handbook. The handbook is intended to provide the employees with information regarding the company’s guideline on important personal areas such as personnel policy, salary and working conditions, absence, holiday and sick leave, termination of employment, insurance schemes, HSE, investment solutions, travel, and expense reimbursement.

An important overall objective of the company is to achieve increased diversity among employees. All the time the company has significant growth plans, it becomes especially important that this is emphasized in the recruitment work. The policy for diversity and inclusion functions as an overall description of Formue’s ambition and work within diversity. This diversity policy covers all forms of diversity: Experience, education, social background, gender, ethnicity, functional level, gender identity and sexual orientation, cultural background, outlook on life and age.

The policy puts emphasis on how important individual differences are for the company and how they must be valued. Formue is convinced that different experiences and perspectives contribute to a healthy, efficient, and innovative working environment, as well as a broader understanding of our customers’ changing needs. All employees must be given equal opportunities and conditions regardless of gender, identity, ethnicity, cultural background, outlook on life, sexual orientation, social background, functional level or age.

The board has the responsibility of ensuring that there is a satisfactory organization, management and internal control for all work that includes diversity and inclusion in the company.

Managers also have a special responsibility to ensure that everyone is treated with respect and has equal opportunities to develop their potential, skills and career. Managers must practice leadership behavior that actively supports diversity and that is characterized by:

- Flexibility and ability to understand different perspectives.
- Clarification of the connection between diversity and value creation.
- A language that builds common identity and promotes mutual respect
- Active use of the potential that diversity creates in projects and other tasks.
- Awareness of one’s own way of acting, form of communication and unconscious assumptions.

The company will promote an even gender distribution at all levels and in all roles, as well as equal opportunities for women and men to combine work and family life. Work actively for diversity at all levels and in all roles, as well as ensure that the diversity and equal treatment perspective is integrated into all processes and routines, such as recruitment, competence development, promotions and salary setting.

S1-2 – Processes for engaging with own workers and representatives about impacts

The company surveys both the physical and psychosocial working environment through employee performance reviews, follow-ups, surveys and safety rounds. These engagements occur directly with Formue’s own workers and not through representatives. Weekly “temperature check” surveys are sent to most employees providing them with options to give feedback on topics regarding working at Formue. In 2022 the response rate on the surveys was 90%.

Office safety rounds are carried out yearly. A safety round is a preventive HSE activity where the purpose is to prevent unfavorable

working environment conditions from occurring, uncover any risk conditions and ensure that improvements are made. The safety round is a practical and good tool for getting a picture of what is going on in the company. Performance reviews and personal follow-ups happen at least once per year for every employee in the company. The responsibility for ensuring that these engagements take place lies with the employee's managers.

S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns

Safety representatives are available for all Formue employees who wish to raise concerns about working conditions. The representatives are chosen by- and among the employees for a period of two years and are bound by duty of confidentiality. The working environment committee has four meetings per year in addition to participating in the planning and development of the safety and work environment in the business.

Whistleblowing routines are in place and available for all employees in Norway. A whistleblowing policy was also put together and published to improve the company's internal routines for whistleblowing. Formue will continue to work with these routines across the group and will further involve Denmark and Sweden in 2024.

The workers are made aware of these channels through the HSE policy on Formue's intranet and through the HR training for new employees held every 4 months, and training and dialogue with leaders.

S1-4 – Taking action on material impacts on own workforce and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions.

Formue is currently working on a new framework for management and talent

development. Elements such as psychological security, competence-based recruitment, training in diversity competence will be part of the framework. There is a great commitment in Formue to the goal of increasing the proportion of women in the financial industry and in the company. The work yields results which, among other things, is shown by the fact that we now meet customers with greater diversity among our employees.

HR participates in various seminars around these issues and collaborate with different networks and partners to better be able to learn and mature in our work within diversity and inclusion. A short-term example of this is how Formue will take part in discussions on how to counteract age discrimination in the workplace and in the recruitment process.

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Formue strives to have a circular business model articulates the logic of how an organization creates, delivers, and captures value to its broader range of stakeholders while minimizing ecological and social costs. The Formue HR cycle is the continuous process of integrated HR activities. The HR life cycle integrates both the HR strategy creation and execution with the employee life cycle. This means that the cycle starts with business strategy, which is translated into HR strategy, organizational design, and HR activities, including recruiting, training & development, all the way until the employee's exit.

Risk is handled by the Compliance & Risk team at Formue and is primarily operational risk management. Operational risk is the specific risk to Formue that does not involve the financial, systematic or market general risk; it is the risk a company is left with in its internal processes, people and systems. The C&R team work actively with risk

management to ensure that the company operates with the right level of operational risk. We use Synergy, a tool for risk management, risk mitigation, reporting operational errors and handling deviations from controls. Together with the divisional teams, we identify risks and advise management and process owners where they are most at risk. HR works with Compliance to support our risks, and we strive that the HR activities is based on the top risks.

A company that does not take risks will also not be able to perform to its full potential. However, we must ensure that we take risks in the right areas and that the trade-off between control and risk is well thought out, so that we can develop the company in the chosen direction and speed.

We focus on alle employees, especially our managers (Train the trainer / Lead with example) when we prioritize HR-activities. We therefore need to be able to define what it is we expect from our leaders across our organization – the leadership competencies they must possess and the behaviors they must display, in order to help Formue execute on our vision, our goals, and the culture we're trying to build.

Our Talent Management Framework is a set of key elements that leads to successful organizations (Jeffrey Pfeffer). Evidence-based leadership* shows that these seven elements contribute to successful sustainability organizations, which is why we base our framework around these elements. *Evidence-based leadership is interventions/methods that have been scientifically documented as effective.

The TM Framework will be an important step in developing the capabilities of our leaders – and over all contribute to motivation for all employees. At the heart of the TM Framework is the relationship between the manager and team members. This is a 'two-way, trusting, productive, working relationship focused on achieving the business goals with each person working to their full potential' – Talent management.

Leadership Principles/Guidelines [Framework for Talent Management 1-7]

1. We lead our employees and teams with a solid foundation in psychological safety
2. We hire the right talents and support each employee to reach their best potential
3. We lead with confidence in our employees' self-leadership for an efficient working day
4. We provide fair and performance-based compensation
5. We create the conditions for our employees' continuous learning and development
6. We believe in diversity, inclusion and equal opportunities in all contexts
7. We lead with a well-developed communicative leadership to support information sharing



S1-6 – Characteristics of the Undertaking's Employees

All data containing characteristics of Formue's own workforce are reported by headcount at the end of the reporting period – 31.12.2022.

Data per 31.12.2022	Total	Women	Men
Formue employees	386	164	222
Norway	311	130	181
Sweden	75	34	41
Full-time employees	370	151	219
Norway	297	118	179
Sweden	73	33	40
Part-time employees	16	13	3
Norway	14	12	2
Sweden	2	1	1
Temporary employees	11	7	4
Norway	10	7	3
Sweden	1	0	1

S1-7 – Characteristics of non-employee workers in the undertaking's own workforce

Formue does not gather data for non-employee workers. By estimation, the total number headcount of non-employee workers in own workforce amounts to approximately six workers by year-end based on billed consultancy cost. The most common type of non-employee workers are consultants from consultancy firms that bills the cost of employment to Formue monthly. Hired consultants are typically employed within the IT field and work from the offices of Formue as a part of teams with both employees and non-employees. The workers are not employed but their work is controlled by Formue, and they are engaged through third party consultancy firms.

S1-8 – Collective bargaining coverage and social dialogue

Overall, approximately 13% of employees are

covered by collective bargaining agreements through their respective unions. The data is based on employees in Norway which make up the majority of the workforce. Data for Sweden is unavailable at current time. Collective bargaining agreements does not determine the working conditions of other employees.

S1-9 – Diversity indicators

Gender distribution in top management team in 2022:

	Total	Men	Women
Board members	7	5 (71%)	2 (29%)
Senior management level	9	9 (100%)	0 (0%)

Senior management reported consists of C-suite only as Formue has a horizontal organization structure.

Age distribution among employees in Formue group:

	2022
% of employees under the age of 30	14
% of employees between ages 30 and 50	58
% of employees above the age of 50	28

S1-10 – Adequate wages

All workers in the company's own workforce are paid fair and competitive wages that ensure a decent standard of living considering national economic and social conditions.

S1-11 – Social protection

All workers in the Formue's own workforce are covered by social protection, through public programs or through benefits offered by company policy, against loss of income due to any of the following major life events:

- Sickness
- Unemployment starting from when the own worker is working for the company

- Employment injury and acquired disability
- Maternity leave
- Retirement

S1-12 – Persons with disabilities

At the end of 2022, less than 1% of all employees consisted of persons with disabilities (“ufør” – between 0,6 og 1%)

S1-13 – Training and skills development indicators

Data per employee is not available, but according to company policy 100% of Formue employees should participate in at least one annual (typically two) career development review with their respective managers. Managers have the responsibility of initiating and completing development reviews with their employees.

Formue does not collect data on training hours. However, each employee participates in a mandatory annual training camp which consisted of 12 hours in 2022. Newly hired employees also participate in a mandatory introduction course which takes somewhere between 15 and 20 hours to complete. All employees are encouraged to complete training modules online at their own initiative.

S1-14 – Health and safety indicators

All workers are covered by Formue’s health and safety management system (HMS) and there were no work-related fatalities or accidents in the reporting period. There were 17 688 hours of unplanned and/or unauthorized absence from work in 2022 which gives an absenteeism rate of 2,87% for the reporting period.

S1-15 – Work-life balance indicators

All workers are entitled to family-related leaves according to Formue’s social policy. Four women and six men used parental leave in 2022 with an average of nine weeks for women and eleven weeks for men.

S1-16 – Compensation indicators (Pay gap and total compensation)

Male-female pay gap was approximately 98% in 2022. This includes guaranteed pay, overtime and other variable compensation. Wealth managers are considered to have equal pay as all wealth managers have the same terms and salary model. The ratio between the compensation of highest paid individual and the median compensation of employees was 8,25 for the same period.

S1-17 – Incidents, complaints and severe human rights impacts and incidents

No registered incidents, complaints or severe human rights impact and incidents.

Governance

G1 Business Conduct

G1-1 – Corporate culture and business conduct policies

All employees and non-employees can report concerns about unlawful behavior or behavior in contradiction of Formue’s code of conduct. In certain situations, the employee also has a duty to report concerns and incidents about unacceptable conditions. This applies to incidents of employee discrimination, dangers to health and safety and breach of AML policy. Reported concerns are processed by a whistleblower taskforce within the company’s HR department and are fully confidential. Any concern can be reported to a close leader, colleague, safety representative or directly to HR either in a private meeting/call or submitted through a survey available on the intranet.

G1-2 – Management of relationships with suppliers

Social and environmental criteria are integral to Formue’s process for selecting suppliers and contractual partners. The company surveys both potential and existing suppliers to ensure that

their ESG work is compliant with official laws and regulations, in addition to internal values and criteria.

G1-3 – Prevention and detection of corruption and bribery

Formue recognizes the importance of maintaining a strong and ethical business environment. As such, we are committed to preventing and detecting corruption and bribery within our organization.

To achieve this goal, we have implemented an approach that includes Ethical Guideline Policy, procedures to investigate, and respond to any allegations or incidents related to corruption and bribery. This also encompasses a risk evaluation of business areas with higher exposure to corruption and bribery risk, to provide more focused training. The system is regularly reviewed and updated to ensure its effectiveness.

In addition to our policy and procedures, we provide training to all employees on the importance of ethical behavior generally. This training is mandatory for all employees and is regularly updated.

In the event of an allegation or incident, our investigating committee is separate from the chain of management involved in the matter. This ensures impartiality and transparency in our investigations.

Our commitment to preventing and detecting corruption and bribery is a priority for Formue and we will continue to invest in improving the system for specific training of employees. Further we will work on implementing measure for detection, through whistleblowing channels and regular confirmation of compliance with requirements from employee groups with higher exposure to corruption and bribery risk. This to ensure that we maintain the highest level of ethical standards.

G1-4 – Confirmed incidents of corruption or bribery

This section provides information on confirmed incidents of corruption and bribery during the reporting period

The total number and nature of confirmed incidents of corruption or bribery	0
The number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws	0
Details of public legal cases regarding corruption or bribery brought against the undertaking and its own workers during the reporting period and the outcomes of such cases	Not relevant
The number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0
The number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0

G1-5 – Political influence and lobbying activities

Formue does not undertake and political influencing or lobbying activities and makes no donations to any political organizations.

G1-6 – Payment practices

Invoices are routinely paid on due date, with net 30 days after receipt being the standard mostly used by suppliers. Where other contractual or statutory terms of payment are used, the payment practice remains the same unless individual agreements are made with the suppliers. Formue's standard contract payment terms are applied to all categories of suppliers. There were no legal proceedings related to delayed or outstanding payments to suppliers in the reporting period.



FORMUE

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