

Report 2023

ACCORDING TO

Corporate
Sustainability
Reporting
Directive



FORMUE

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FORMUE

Formue is a privately held financial life management company with 400 employees in 25 offices in Norway, Sweden and Denmark. The Group has approximately NOK 145 billion under advisory services and management for clients and is the largest independent wealth manager in Norway.

Clients' capital is invested through external managers in listed equities, bonds and in alternative asset classes such as hedge funds, private equity and real estate: capital is spread across many different funds across asset classes, sectors and geographies. To best meet our clients' holistic needs, Formue has experts in the fields of tax, law, pensions, accounting, retirement planning, sustainability and art. The specialists are integrated into the customer relationship depending on the needs of the customer.

Although Formue is not legally obliged to prepare a CSRD report until 2025, we have chosen to produce a 2023 report to prepare for the upcoming reporting requirements.

The process has proved valuable for us again, allowing us to assess progress versus our 2022 report, and reveal areas where we still need to improve, in particular:

- Reporting of Scope 3, category 15, "Financed emissions", where data has improved but particular challenges remain in our illiquid asset classes.
- More detailed double-materiality analysis, in particular placing objective, quantitative values on the risks and opportunities.

Our TCFD report, to be published later this year, will provide improved climate disclosure but, from 2024, will become incorporated into our CSRD report.

General Disclosures

Basis for preparation

BP 1

General basis for preparation of the sustainability statements

The sustainability statements, following the requirements set by the Corporate Sustainability Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), provide consolidated data for the Formue group, including all offices in Norway, Sweden and Denmark. The report covers the period from 01.01.2023 to 31.12.2023, and the scope of consolidation is the same as for the financial statements. 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, reporting will still be completed for the years leading up to mandatory reporting, mainly for internal use and as a basis for improvement. Consequently, the 2023 report is not intended as an official report to be published or shared externally as an official ESRS sustainability statement.

The report includes a description of the double materiality assessment process, covering topics material to Formue's operations. The scopes of the statements are mainly focused on cross-cutting standards in addition to topical standards E1, S1 and G1. The remaining standards and disclosures are included where they are deemed relevant based on the results of a 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, impending developments or matters.

BP 2

Disclosures in relation to specific circumstances

Some new elements have been added to the 2023 report compared to the report published for 2022. These changes include adding and improving disclosures describing material impacts, risks, opportunities and the process to identify and assess them. In addition, accounting policies for gathering and measuring metrics for environmental have been added to further explain the methods used to collect and calculate the numbers reported.

The report includes parts with overlapping information from separate reports published by Formue, such as The Transparency Act (Åpenhetsloven) and TCFD. In future ESRS reporting we aim to merge the different reports together into an expanded and fully consolidated ESG report.

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.

Certain events occurring in the period between the 1st of January 2024 up until the publication of this report are included where it is deemed relevant to the reporting of certain material disclosures for the reporting period.

Sustainability Governance

GOV 1

– The role of the administrative, management and supervisory bodies.

GOV 2

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

Board of Directors

The Boards of Directors of each company within the Formue Group hold ultimate responsibility for their respective company's activities. This includes ensuring a satisfactory organization, effective management, and robust internal controls for all sustainability-related work within the Group. The boards are committed to fostering organization, competence development, system development, and internal controls that support the company in achieving its sustainability goals.

The board of the group parent company Formue AS consists of seven members. All are non-executives and there is no employee representation. Four members from large owners and three independents, however with minor shareholdings. Three out of seven board members are women, i.e., 43%. The boards members have diverse educational backgrounds, however with limited experience within the sustainability field. All members are European: three Norwegian, two Swedish, one Danish, and one British. Three members have more than thirty years of experience from the wealth management industry, covering all aspects of Formue operations. The other four have at least ten years of experience from investments. Formue does not record data on race, sexual orientation, handicaps, political orientation or similar.

The regulated subsidiary boards of Formue Norge AS and Formue Sverige AB each have 40% female representation and 40%

non-executive members. These boards are composed entirely of Norwegian and Swedish individuals with extensive experience and diverse backgrounds in the wealth management industry. The unregulated subsidiary boards are predominantly made up of executives and have a higher proportion of male members.

Formue has two board sub-committees, both consisting of non-executives only:

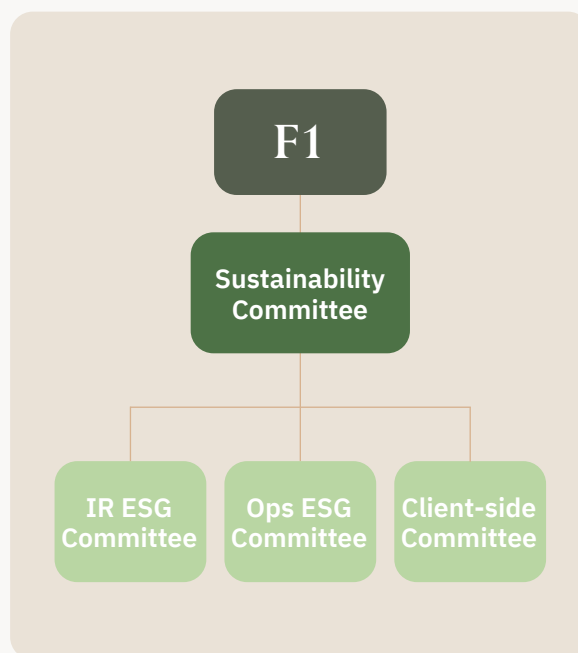
- Compensation committee, with 33% female representation, overseeing adherence to regulatory requirements and internal compensation policies.
- Audit committee, with 50% female representation, overseeing the accounting and finance framework but more importantly the internal control setup, including operational 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.

Senior Management

Formue's C-level executive team, known as F1, consists of nine members led by the CEO. The executive team manages the company and its daily operations. Individual executives are designated for AML and GDPR oversight responsibilities. The Executive Board (F1) has a more direct and regular focus on climate-related risks and opportunities within Formue. Most F1 members also participate in the Sustainability Committee, which also includes Formue's sustainability advisors and compliance representatives. All team members are males, with ten to thirty years of experience in the wealth management industry, some having additional backgrounds in other industries, and a diverse range of educational background. The broader management group, comprising approximately 90 members, has 42% female representation and a wide variety of educational and professional backgrounds.

Supervisory Bodies

Formue has approximately one hundred internal 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, advisory and investments. Two designated individuals with significant sustainability experience chair these committees. Members of the Sustainability committee report to the boards on an ad hoc basis. The Sustainability Committee is responsible for approving internal sustainability policies, including Formue’s Sustainability Policy, Supplier Code of Conduct, and Diversity & Inclusion policies. Additionally, it is tasked with communicating key issues to the F1 executive team and the Non-Executive Board. The annual report on adherence to the Transparency Act (Åpenhetsloven) is issued by the board of the parent company, Formue AS.



	SusCo	Investments SusCo	Operations SusCo	Client-side SusCo
Members	<ul style="list-style-type: none"> Sustainability Advisor CEO CIO CFO Head of FWS (Family Wealth Services) Strategy Head 	<ul style="list-style-type: none"> Sustainability Advisor Deputy CIO / Investments COO IR Reporting Manager Asset Class reps* 	<ul style="list-style-type: none"> Sustainability Advisor HR Representative CTO Office Managers 	<ul style="list-style-type: none"> Sustainability Advisor Formue X Delivery Business Compliance Weath Managers CMO
Compliance				

* Rotating reps depending on needs/ agenda

One key responsibility of the Compliance & Risk function is regulatory oversight, which includes staying updated on regulatory developments and their status. This information is communicated through the quarterly C&R report and quarterly updates to the audit committee, the group board, the boards of regulated companies, the executive team, and the wider management group. Additionally, the function provides department-specific training and company-wide information and training sessions.

GOV 3

Integration of sustainability-related performance in incentive schemes

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

GOV 4

Statement on due diligence

Due diligence in the fund manager selection process for our clients’ investments

Formue carries out due diligence and follow-up of the fund managers we use to ensure that sustainability risks are assessed in the correct way. We influence the managers to put in place clearly formulated principles for good governance (in line with OECD principles) and to answer our questionnaire on annual reporting (sent to all operating and investment suppliers). We do not invest with fund managers

whose processes and portfolios are believed to violate UN norms and conventions. We integrate sustainability into our investment decisions and follow up managers who we believe have opportunities for improvement in their processes to manage sustainability risks. By influencing managers to improve their sustainability process, we can simultaneously reduce the risk in our customers' investments.

1. First evaluation	2. Introduction meeting	3. Analyses	4. Negotiations or structuring	5. Continuous follow-up
Sourcing and screening <ul style="list-style-type: none"> • Investment process • Transition risk / opportunities • ESG solutions focus • Are social factors covered • Can we engage with this manager 	Identification of potential improvements <ul style="list-style-type: none"> • Is there a formalized ESG policy • Is ESG integrated into the process • Does transition risk have a central role in the process • Is diversity taken seriously 	Detailed review of ESG policy <ul style="list-style-type: none"> • Evidence of systematic use of objectives, data, measurement • Use of best practice standards • Memberships and regulatory classifications 	Side letters; mandate agreements <ul style="list-style-type: none"> • Carbon data requirement in private equity and real estate investments • Managed accounts used to achieve structural objectives in certain public market investments 	Engagement to bring about change <ul style="list-style-type: none"> • Use of data in the on-going evaluation wherever possible • Proactive follow-up based on internal evaluation objectives • Formue classification objectives

Fund managers are classified according to their integration of ESG, based on a number of KPIs that are registered in Formue's CRM system. In meetings with fund managers, among other things, the most important KPIs that Formue uses to report and adapt to the Sustainable Finance Disclosure Regulation are discussed. We pay particular attention to:

1. GHG-related Principal Adverse Impacts (PAI) and
2. The proportion of the portfolio that has set an approved Science Based Target (SBTi).

By working to improve the footprint that appears in PAI scores, and maximizing exposure to

SBTi-approved companies, the sustainability risk associated with global warming should be reduced. For non-environmental factors (such as human rights and equality), our advocacy process focuses on good corporate governance to reduce risk in these factors.

Due diligence of service providers to us as a company

In the same way as with our manager selection process, we have a systematized and centralized follow-up of suppliers who deliver services to us as a company. Our largest suppliers (which make up over 50% of our total purchases) must carry out a sustainability survey, with a spotlight on, among other things, human rights

and decent working conditions. The survey is carried out both before the supplier relationship is started and during the ongoing follow-up. We experience that the information from the surveys provides good management information on how potential suppliers handle sustainability, including human rights. This is information that is weighted when assessing new suppliers.

All our major suppliers have significant strategic and operational importance for us. We work so closely with them that we have sufficient insight into how they look after working conditions in their own operations, so that we can make an overall assessment of the risk of human rights violations. Going forward, we will increase insight further down the value chain, for example employee relations at subcontractors for portfolio information systems, data developers or hardware.

Sustainability risk management

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 fairly 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 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.

Strategy and business model

SBM 1

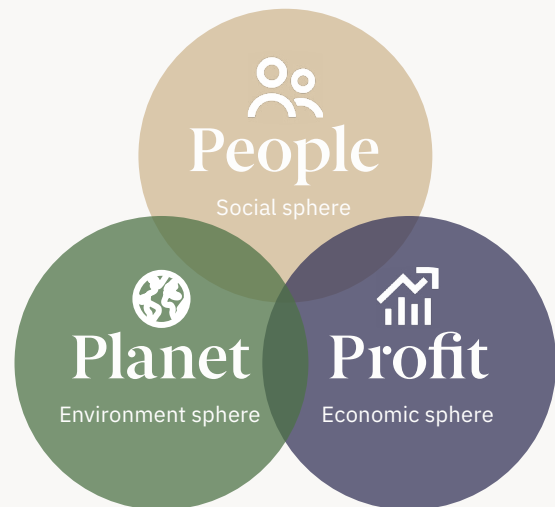
Strategy, business model and value chain

Formue's 418 employees as of 31.12.2023 are spread across the Nordics with 11 in Denmark, 327 in Norway, and 80 in Sweden. All 1063 MNOK revenues comes from Financial Life Management services provided to wealthy families and organizations, with 0,1 MNOK in Denmark, 896 MNOK in Norway and 166 MNOK in Sweden.

Formue's sustainability goal for its own operations is to become carbon neutral in 2025 including offsets. The sustainability impact of our own operations is very limited compared to the sustainability impact of client investment portfolios. As all other financial advisors, Formue's legal obligation according to MiFID is to assess each client's financial needs, risk tolerance and portfolio preferences including sustainability preferences. This governs the sustainability profile of the investment portfolio.

Through information, awareness, and education, over time we aim to push our clients towards more sustainable portfolios. Client interactions involving sustainability is one of the KPIs in our double-materiality analysis. Our investment manager selection process aims to exclude any managers whom we perceive lack the ambition or tools to include sustainability as a critical factor in their process; this includes removing managers where insufficient progress is made.

Our vision is to contribute to a richer life for our customers, employees and society in general. We strive towards making our customers better off tomorrow than they were yesterday, including making the world a better place in which to live and invest. Without long-term sustainable investment opportunities, our business model vanishes.



We aim to measure our results with a triple bottom line approach, including “People”, “Planet” and “Profit” KPIs. Aimed at Formue employees and other stakeholders, the triple bottom line framework aligns KPIs with long-term goals crucial for our success, focusing on profitability, growth, and stakeholder impact (including the planet). These goals are central to Formue's strategy and contribute to regulatory (CSRD, SFDR) and voluntary (PRI, SBTi) reporting. Currently, People or Planet metrics are not part of senior management's long-term incentives, but that may change in the future.



SBM 2

Interests and views of stakeholders of stakeholders

The following overview summarizes our key stakeholder engagement, in addition to the purpose of the engagements and their outcomes. Engagement with stakeholders occurs on a daily basis and is undertaken by all departments in Formue.

Our vision is to contribute to a richer life for our customers, employees and society in general.

Key Stakeholders

	Engagement	Purpose/Outcome
Customers	<ul style="list-style-type: none"> • Meetings (in-person and online) • Mail correspondence • Client events • Online Climate Tool • Personalized consultations 	To reduce the environmental footprint of clients' investment portfolios, ensure adherence to UN norms and conventions, and educate clients on the impact of their lifestyle choices, investments, and influence over companies. This also includes offering tailored advice to align investment strategies with sustainable practices.
Employees	<ul style="list-style-type: none"> • Training sessions • Performance reviews • Employee satisfaction surveys • Team-building activities 	To cultivate an inclusive, team-oriented work culture focused on efficiency, work-life balance, and continuous professional development. Encouraging open communication and collaboration helps foster innovation and employee well-being.
Suppliers	<ul style="list-style-type: none"> • Annual supplier surveys • Follow-up assessments 	To ensure compliance with Formue's business conduct standards and the Norwegian Transparency Act, and to promote a collaborative approach to improving sustainable and ethical business practices. This includes regular evaluations and working with suppliers to improve their ESG performance.
Board of directors	<ul style="list-style-type: none"> • Board meetings • ESG impact assessments 	To establish and refine ESG policy, strategy, and targets, and to regularly review and assess the organization's performance. The board also plays a critical role in guiding the long-term sustainability strategy and ensuring alignment with global standards.
Investors	<ul style="list-style-type: none"> • Responding to annual ESG surveys from private equity investors (IK and ICG) • Sustainability performance reports 	To ensure alignment with and achievement of sustainability targets set by investors, while maintaining transparency and providing regular updates on ESG performance.
Regulators/ Authorities	<ul style="list-style-type: none"> • Monitoring updates from official channels • Compliance audits • Participation in regulatory consultations 	To maintain full compliance with ESG regulations, proactively adapt to regulatory changes, and participate in shaping future regulatory frameworks through active engagement in consultations and discussions.

SBM 3

Material impacts, risks and opportunities and their interaction with strategy and business model

Our seven material topics are listed below, with four relating to specific SDGs and three others linked to standard materiality conventions of SASB and MSCI (see IRO-1 for more information).

Formue has impact on material topics across the three main business areas.

Material topics

- Diversity & Inclusion (SDG 5)
- Employment & training (SDG 8)
- Human rights and decent working conditions (SDG 8)
- Climate change (SDG 13)
- Product design and Lifecycle management (Incorporation of ESG factors into advice)
- Selling practices & Product labelling (Transparent information for customers)
- Business Ethics (Compliance with rules and industry best practices)

Business areas



SDGs



Apart from the key materiality factor of Climate change, these are not all relevant to each of our three business areas.

We have chosen to focus certain materiality topics on those business areas where they are most relevant to our strategy. For example, within operations, we will have greater focus on Diversity & Inclusion (SDG 5) as it affects the bulk of our employees and, in some cases, suppliers. Within the Investment portfolio, Business ethics is a clear priority both in terms of how vital it is to our growth strategy (generating trust from our clients) but also in terms of the potential impact it can have on our portfolios.

To ensure that these are coherently linked to our business strategy rather than being a “nice to have” crutch, we have also set specific goals and KPIs relating to each materiality factor, allowing us to track progress over time.

IRO 1

Description of the process to identify and assess material impacts, risks and opportunities

During 2023, a process was begun to refine and better define the sustainability focus Formue had included in its sustainability policy since 2021. This was led by Formue’s own sustainability advisors, taking advice and in some cases quantitative inputs from the following sources:

- Peer group reviews, including DNB, Handelsbanken, Carnegie, Söderberg & Partners, Lombard Odier and Pictet
- Regulatory assessments and frameworks relating to the upcoming CSRD implementation
- Assessing best in class disclosures across a range of industries to better understand thresholds for disclosure

- Data providers to the financial industry, including specific advice on materiality topics from MSCI and SASB.

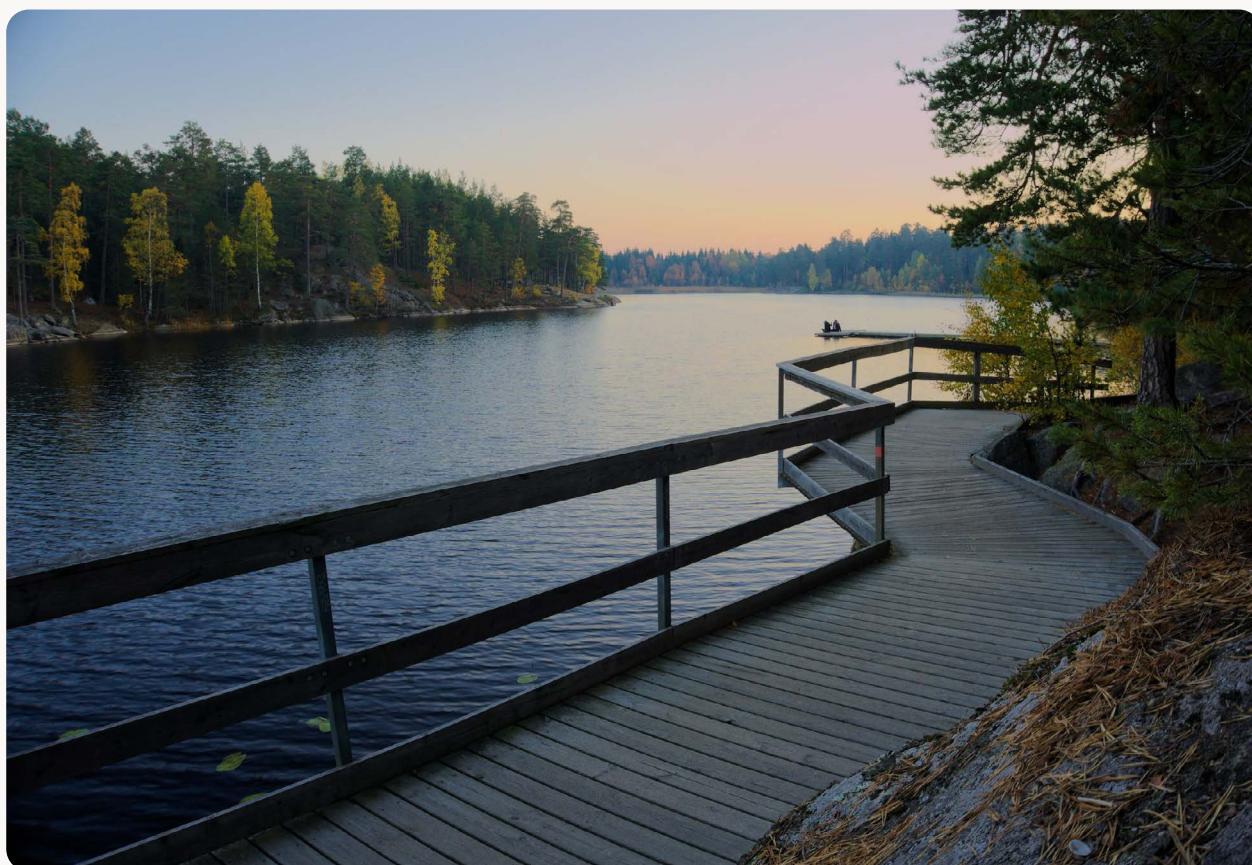
In all cases, we were aware of the varying nature of Formue's business lines, and attempted to set a materiality analysis framework which would account for both double materiality and also the specific requirements of our Operations, Investments, and Advisory services. Given the scale of our assets under management compared to Formue's relatively modest operating expenses and corporate advisory income, Investments is clearly the area which poses both the biggest potential opportunities and risks to our business at the group level. But we found it useful to consider materiality in the context of each business line when setting priorities.

It was also important to ensure that the initial conclusions (based on the above process) were acceptable to our various stakeholders. We therefore followed a process of consultation,

editing, and approval from the following partners:

- Employees (via a firmwide questionnaire asking for feedback on priorities)
- Investors – notably our two private equity investors ICG and IK Capital
- Senior management
- The Sustainability Committee (Formue's internal body for approving sustainability-related matters)

In terms of financially quantifying the risks and opportunities around these materiality topics, we have employed a basic matrix of Likelihood vs Financial/ Sustainability impact. Although in most cases this is still based on estimates or a range of scientific hypotheses (for example, the net financial impacts on global equity markets from global warming still range from negligible to -60%) it is hopefully an area where our disclosure and background data can be improved over time.





Environmental Information

E1 Climate change

E1-1

Transition plan for climate change mitigation

The transition plan is embedded in the overall business strategy, financial planning and approach. GHG emissions targets for medium term horizon consist of a 60% reduction in operational emissions by 2025 from a 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. Formue is not excluded from Paris-aligned benchmarks and the transition plan is embedded in the company strategy and approach.

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

Within Scope 3 Category 15 (Financed emissions) our goals will be met via engagement with fund managers, who will be encouraged to include more SBTi-approved companies in their own portfolios. Given the higher starting point (baseline) in Equities, we would expect to see Equities continue to drive this concentration of net-zero aligned companies faster than in Fixed Income. This was certainly the case in 2023, where Equities SBTi coverage increased from 33% to 41%, but Fixed income coverage remained static at 9% (the blended coverage ratio increased from 23% to 28%, slightly ahead of plan).

These figures exclude Sovereign debt and cash (currently out of scope) but also Private Equity, Hedge Funds, and Real estate, where data availability is currently more limited. However, the intention is to include all asset classes except Hedge funds within our targets by 2027, and that the entire portfolio will be Net Zero aligned according to SBTi methodologies by 2040.

E1-2

Policies implemented to manage climate change mitigation and adaption

Formue has adopted an official company sustainability policy that provides a detailed 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.

As a service-based company, the main source of emissions in our own operations are from business travels. The company travel policy encourages employees to use transportation with lower carbon emissions in their business travels. This includes traveling by lower carbon transportation options where it is possible to do so, and to purchase biofuel when it is provided by airlines.

Another source of emissions in our own operations are the purchase of new hardware. Formue's device policy mandates the procurement practice for employee devices across all offices. The policy encourages prolonged use of older devices and equipment instead of purchasing new hardware, in addition to setting limits to how often employees can request new devices to be purchased for them.

The policies are made available to all employees on the Formue intranet.

Performance, metrics and targets

E1-3

Actions and resources in relation to climate change policies

Formue set 2022 as the baseline for estimation of CO₂ emissions for the consolidated group with significant effort towards calculating relevant scope 3 categories. After consolidating all GHG data for our own operations in 2022, an increased effort was put toward lowering our emissions throughout 2023, in accordance with the transition plan. The actions taken also include processes for formalizing policies on a group level to maintain a consistent approach across all Formue's offices and departments. This includes key policies in the efforts to mitigate emissions, such as the Business Travel Policy and Device Policy, in addition to fostering a sustainable work culture

Main decarbonization activities completed in 2023:

	Achieved reduction 2023 (t Co ₂ e)	Planned/expected reduction 2023 (t Co ₂ e)
Purchase certificates of origin for electricity in all offices in Norway, Sweden, and Denmark	- 69,15	0,00
Reduce volume of purchased new hardware	- 135,9	- 46,7
Reduce volume of purchased new furniture	- 14,9	+4,2

The activities shown in the table represents concrete actions taken in 2023 to reduce emissions. However, as shown in the complete GHG overview in E1-5, the overall emission reduction from these activities is neutralized by a significant increase in emissions from business travels. This increase in scope 3 emissions will be thoroughly addressed in 2024.

E1-4

Targets related to climate change mitigation and adaptation

Formue is committed to the goals of the Paris Agreement, having set science-based GHG emission reduction targets compatible with limiting global warming to 1,5°C. GHG emissions targets for medium term horizon consist of a 60% reduction in operational emissions by 2025 from the 2022 baseline and 65% reduction by 2027, including scope 1 & 2 in addition to categories 1-14 for scope 3. Starting from 2025, remaining operational emissions will be compensated with the use of carbon credits. 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 (28% in 2023). 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 (t Co ₂ e)	Reduction %
Scope 1	18,41	0,00	- 18,41	- 100%
Scope 2	108,50	5,00	- 103,50	- 95,67%
Scope 3	618,02	257,00	- 361,02	- 58,42%
Total	744,93	262,00	- 482,93	- 64,83%

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). The medium-term targets were set during a time of significant recruitment, and it is expected that the recruitment will not be continued at the same level in the years leading up to 2027. However, should future development require an increase in recruitment efforts, this could potentially impact the targets as it will lead to an increase in scope 3 emissions.

E1-5

Energy consumption and mix

Energy usage primarily includes consumption of district heating and electricity in Formue offices. To achieve our emission reduction targets for scope 2 emissions, we made a considerable effort in the reporting period to engage our office suppliers and building managers to ensure a greater usage of renewable electricity through certificates of origin. This process resulted in an increased total of roughly 95% renewable electricity in our total electricity consumption for 2023, not including district heating. Achieving a 100% usage of renewable electricity has proven difficult as many offices are in co-working spaces where we do not have any influence on the purchase of electricity. However, we strive to maintain dialogue and cooperation with our

office suppliers to influence energy transition to fully renewable sources.

The total energy consumption for the group was 1686 MWh in 2023 for scope 1 and 2 emissions. A turnover of 1 063 MNOK in 2023 gives an energy intensity of 1,58 MWh per MNOK. The energy intensity is fully derived from data regarding energy consumption and activities in the real estate sector (high climate impact sector).

	2022	2023
Total energy consumption MWh	1 244	1 686
Energy intensity MWh per MNOK	1,24	1,58

*Formue is committed
to the goals of the
Paris Agreement*

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 using the method described by Carbon Disclosure Project in [CDP Technical Note: Conversion of fuel data to MWh](#)

Energy consumption and mix	2022	2023
Fuel consumption from coal and coal products (MWh)	0,00	0,00
Fuel consumption from crude oil and petroleum products (MWh)	75,85	72,96
Fuel consumption from natural gas (MWh)	6,76	7,27
Fuel consumption from other non-renewable sources (MWh)	0,00	0,00
Consumption from nuclear products (MWh)	0,00	0,00
Consumption of purchased or acquired electricity, heat, steam, and cooling from non-renewable sources (MWh)	429,21	197,54
Total non-renewable energy consumption (MWh)	511,82	227,77
Share of non-renewable sources in total energy consumption (%)	41,13	16,47
Fuel consumption for renewable sources (including biomass, biogas, non-fossil fuel waste, renewable hydrogen, etc.) (MWh)	0,00	0,00
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	732,42	1 408,72
The consumption of self-generated non-fuel renewable energy (MWh)	0,00	0,00
Total renewable energy consumption (MWh)	732,42	1 408,72
Share of renewable sources in total energy consumption (%)	58,87	83,53
Total energy consumption (MWh)	1 244,24	1 686,49

E1-6

Gross Scope 1, 2, 3 and Total GHG emissions

Total emissions decreased overall in 2023 compared to base year 2022. This is mainly due to a lower volume of purchased goods and services and successfully acquiring certificates of origin for use of renewable electricity in most of our offices. However, business travel

saw significant emissions increase compared to 2022. Some of which can be explained by an increase in workforce and post-covid travel activity, but still much more than budgeted for in our transition plan to reach our emissions targets. In 2024, we aim to better track, control and reduce emissions from business travel, including updating our travel policy.

	Base year 2022	2023	Target 2025	Target 2027
SCOPE 1 GHG emissions (tCO ₂ e)				
Fuel consumption from leased company vehicles	18,41	17,14	0,00	0,00
SCOPE 2 GHG emissions (tCO ₂ e)				
Gross location-based scope 2 emissions (Electricity)	18,25	29,59	18,25	18,25
Gross market-based scope 2 emissions (Electricity)	108,50	38,97	5,00	5,00
SCOPE 3 GHG emissions (tCO ₂ e)				
Category 1: Purchased good and services (Datacenters)	20,39	18,22	10,00	0,00
Category 1: Purchased good and services (IT Hardware)	201,29	65,43	63,54	55,21
Category 1: Purchased good and services (Office furniture)	35,75	20,89	15,00	10,00
Category 1: Purchased good and services (Oslo canteen)	40,10	25,09	30,00	30,00
Category 3: Fuel and energy-related activities (Grid loss)	0,69	1,98	0,03	0,03
Category 5: Waste generated in operations	0,91	1,04	0,90	0,90
Category 6: Business travel (Air travel)	181,70	367,28	78,23	66,20
Category 6: Business travel (Employee mileage)	26,50	39,87	15,00	15,00
Category 6: Business travel (Employee commuting)	110,69	97,62	85,00	80,00
TOTAL GHG emissions (tCO ₂ e)				
Total GHG Emissions – Location-based (tCO ₂ e)	654,67	684,16	315,95	275,59
Total GHG Emissions – Market-based (tCO ₂ e)	744,93	693,53	302,70	262,34
GHG INTENSITY per net turnover				
Total GHG emissions (location-based) per net turnover (tCO ₂ e/MNOK)	0,65	0,64		
Total GHG emissions (market-based) per net turnover (tCO ₂ e/MNOK)	0,74	0,65		

Net revenue of 1 063 MNOK as per the 31.12.2023 financial statement

GHG accounting policies and methodology

Scope 1 emissions are calculated by multiplying total consumption of fuel for leased cars with emission factors for each corresponding fuel type.

Scope 2 emissions are reported according to the GHG Protocol and include direct emissions from the consumption of electricity in all Formue offices. Electricity consumption data is measured in KWh and collected from year end reports by electricity suppliers or directly from building managers. GHG emissions are calculated by total power consumption multiplied by country specific emission factors for both location- and market-based scope 2 reporting.

Scope 3 emissions are divided into categories based on the 15 scope 3 emission categories identified by the GHG Protocol. As a result of a screening process conducted in base year 2022, categories 1, 3, 5, 6, and 7 were deemed relevant for Formue and together they account for the total scope 3 emissions.

- Category 1: Purchased goods and services are limited to IT-hardware, office furniture, food at canteen in Oslo office, and the use of datacenters in IT operations. Emissions are calculated using Environmental product declarations (EPD) provided by suppliers.
- Category 3: Only including loss of electricity on power grid for purchased electricity. Calculation is done using country specific emission factors and national statistics on grid loss applied to Formue's own consumption data.
- Category 5: Collected waste data from building managers multiplied by emission factors for different types of waste.
- Category 6 and 7: Business travel data is collected through travel agencies used by all offices. In addition, data is collected

through an annual employee commuting survey sent to all employees and from data for employee mile allowances. Emission calculations for employee commuting are done using mileage multiplied by emission factors for different types of transportation.

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 employee transportation. For scope 3 – cat. 1, products with no available EPDs were calculated using EPDs for other products with similar specifications. 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 is currently not covering the impact of investments.

E1-7

GHG removals and GHG mitigation projects financed through carbon credits

No GHG removals and/or GHG mitigation projects financed through carbon credits are included in our GHG reporting in reporting period 2023, however we did finance the purchase of 150 t CO₂ of carbon credits, together with an equal investment in biodiversity initiatives, to be realized in 2024. Planned purchased of carbon credits is expected to cancel roughly 303 t CO₂e by 2025 and 263 t CO₂e by 2027, in line with our objectives of carbon neutrality in operations by these dates.

E1-8

Internal carbon pricing

Formue does not apply any internal carbon pricing schemes.

E1-9

Potential financial effects from material physical risks

We reported according to TCFD guidelines for the first time in October 2023. As part of this, we focused on portfolio coverage of our external fund managers who also report to TCFD, as a proxy for those fund managers who are measuring potential climate risks (both physical and transition). This analysis will be updated in our 2024 TCFD report, together with an emissions footprint estimate of our assets under management (in accordance with PCAF scoring of emissions data quality).

We aim to improve this PCAF score over time, which in turn will improve the accuracy of overlaying climate scenarios on the value of the portfolio. However, combining estimates of financial risks across asset classes is still very challenging

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 Information

S1 Own Workforce

S1-1

Policies related to own workforce

Policies related to Formue's own workforce are compiled in the personnel & leader handbook available to all employees on the Formue intranet. The handbooks are 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 policy, investment solutions, travel, and expense reimbursement. The policies related to our own workforce do not explicitly address human trafficking, forced labour and child labour.

We are committed to provide our employees a stable work environment with equal opportunity for learning and personal growth. Creativity and innovation are encouraged for improving the effectiveness of Formue. We lead by example and advocate equitable sustainable treatment in our behaviors, policies, and practices. Above all, we know that happy employees ensure happy customers.

An important overall objective of the company is to have an environment where everyone feels that they are included despite our differences. 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 for diversity and inclusion, along with our framework for leadership and talent management, 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. We will 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

Formue 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 all employees via Winningtemp, providing them with options to give anonymous feedback on topics regarding working at Formue. In 2023 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 employees are made aware of these channels through the HSE policy on Formue's intranet and through the HR training for new employees held every four months, in addition to training and dialogue with leaders. The weekly pulse surveys from Winningtemp are also a channel for raising awareness and concerns about the work environment.



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 has a framework for leadership and talent management. Elements such as psychological security, competence-based recruitment, training in diversity competence is part of the framework and available in the Leaders handbook. There is a great commitment in Formue to the goal of increasing the proportion of women in the financial industry and in the company. Formue is founding partner of Kvinner i Finans Charter, where we are committed to the following:

This work yields results which, among other things, is shown by the fact that we now meet customers with greater diversity among our employees. By the end of 2023 Formue had a gender split of 42% women and 58% men among all employees in the group.

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.

The four principles

01

A member of the executive committee to have dedicated responsibility for gender balance and inclusion

Ensure commitment from the organisation's leadership, either the CEO or a person reporting to them

02

Set internal targets for gender balance in leadership and senior positions

Set concrete and realistic goals, reflecting the size, situation and needs of the organisation, as well as initiatives to follow them up

03

Have an ambition to reflect the achievement of targets in leadership remuneration

Establish a plan for linking the realisation of targets to executive compensation

04

Publish the status of and progress towards targets on own website

Support transparency and commitment by publishing targets, status and annual progress on own website together with the Women in Finance logo

Performance, metrics & targets

S1-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Formue strives to achieve a circular business model and 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 that covers 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 and 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 all employees, especially our managers (Train the trainer / Lead with example) when we prioritize HR-activities. We 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 are trying to build.

Our Leadership & 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.

The 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 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 continuous performance, 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

The Foundation a Richer Life

The Foundation was established by Ingrid Stange in 2007 and was Formue's philanthropic arm until 2012 when Partnership for Change (Pfc) was founded. In 2012, the employees of Formue took over the foundation.

In 2024, Pfc is the preferred partner in the selection and reporting of projects for the funds raised. All of the foundation's costs are covered by Formue. All funds raised go directly to the selected project. Those who participate in donating decide which project will receive the annual funds. The board of directors of the foundation consists of employees of Formue.

Partnership for Change has developed a long-term, resilient model, anchored in the work of strong local partners. Together we scale up a much-needed transformation to create systemic change. Early Childhood Care and Education (ECCE) is the bedrock of our work, lifted by our 4 main tools – education, quality assurance, centre-based childcare, and value-chain creation. These tools encompass direct project implementation as well as transformative awareness-raising, to ensure that social justice and internationally recognised human rights are realised in practice, not just theory.



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 – 31.12.2023

Data per 31.12.2023	Total	Women	Men
Formue employees	418	175	243
Norway	327	135	192
Sweden	80	36	45
Denmark	11	4	6
Full-time employees	399	163	236
Norway	312	126	186
Sweden	76	33	43
Denmark	11	4	7
Part-time employees	19	12	7
Norway	15	9	6
Sweden	4	3	1
Denmark	0	0	0
Temporary employees	9	5	4
Norway	7	4	3
Sweden	2	1	1
Denmark	0	0	0

48 employees left the company during 2023 which gives a net employee turnover rate of 11% in the reporting period. Formue does not employ workers without a minimum number of guaranteed hours.

S1-7

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

Formue does not have an official statistic on the number of non-employee workers, but we are currently working on an overview to be used for future reporting. The most common type of non-employee workers are consultants from consultancy firms that bill the cost of employment to Formue monthly. Hired consultants are typically

employed within the IT-field and some also 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 typically 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 2023:

	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. Gender distribution among both board members and senior management team remains unchanged from 2022.

Age distribution among employees in Formue group:

	2022	2023
Employees under the age of 30	14%	12%
Employees between ages 30 and 50	58%	56%
Employees above the age of 50	28%	32%

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

- Sickness
- Unemployment
- Employment injury and acquired disability
- Maternity leave
- Retirement

S1-12

Persons with disabilities

Formue does not collect data from employees regarding disabilities and consequently we are unable to disclose accurate data on the matter. By estimation, less than 1% of all employees in our own work force consisted of persons registered with a current work disability ("ufør") at the end of 2023.

S1-13

Training and skills development indicators

Training 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 reviews 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, newly hired employees 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, while modules involving GDPR and IT security are mandatory to complete at least once per year.

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 18 248 hours of unplanned and/or unauthorized absence from work in 2023 which gives an absenteeism rate of 2,48% for the reporting period. The rate is calculated using an assumption of 47 weeks of work per employee per year, and a 7,5-hour workday.

S1-15

Work-life balance indicators

All employees are entitled to family-related leave according to Formue's social policy. In total, seven women and twenty-eight men took parental leave in 2023.

S1-16

Compensation indicators (Pay gap and total compensation)

Gender pay differences were not calculated in 2023 as Formue currently only conducts this research every other year. For future reporting, the pay gap will be disclosed every year. Male-female pay gap was approximately 98% in 2022 and is expected to have remained at a similar level in 2023. 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 gender pay gap

was calculated using data from our payroll system and by categorizing positions that perform work of equal value regardless of the field of expertise. We have based this on the requirements of the relevant positions and considered the competency requirements and other relevant factors such as responsibility, necessary skills, minimum education requirements, and work experience.

The ratio between the compensation of highest paid individual and the median compensation of employees (excluding the highest paid individual) was 4,72 for the reporting period. The remuneration ratio is calculated using data per 31.12.23 and dividing the annual salary of highest paid employee by the annual salary of the median employee.

S1-17

Incidents, complaints and severe human rights impacts and incidents

Nine work-related incidents and/or complaints were reported in 2023 through Formue's own channels for raising concerns. All cases have been addressed internally and are considered closed in accordance with our procedures for handling complaints.

There were no registered severe human rights impact and incidents in the reporting period and consequently no fines or penalties were paid as compensation.

S2 Workers in the value chain

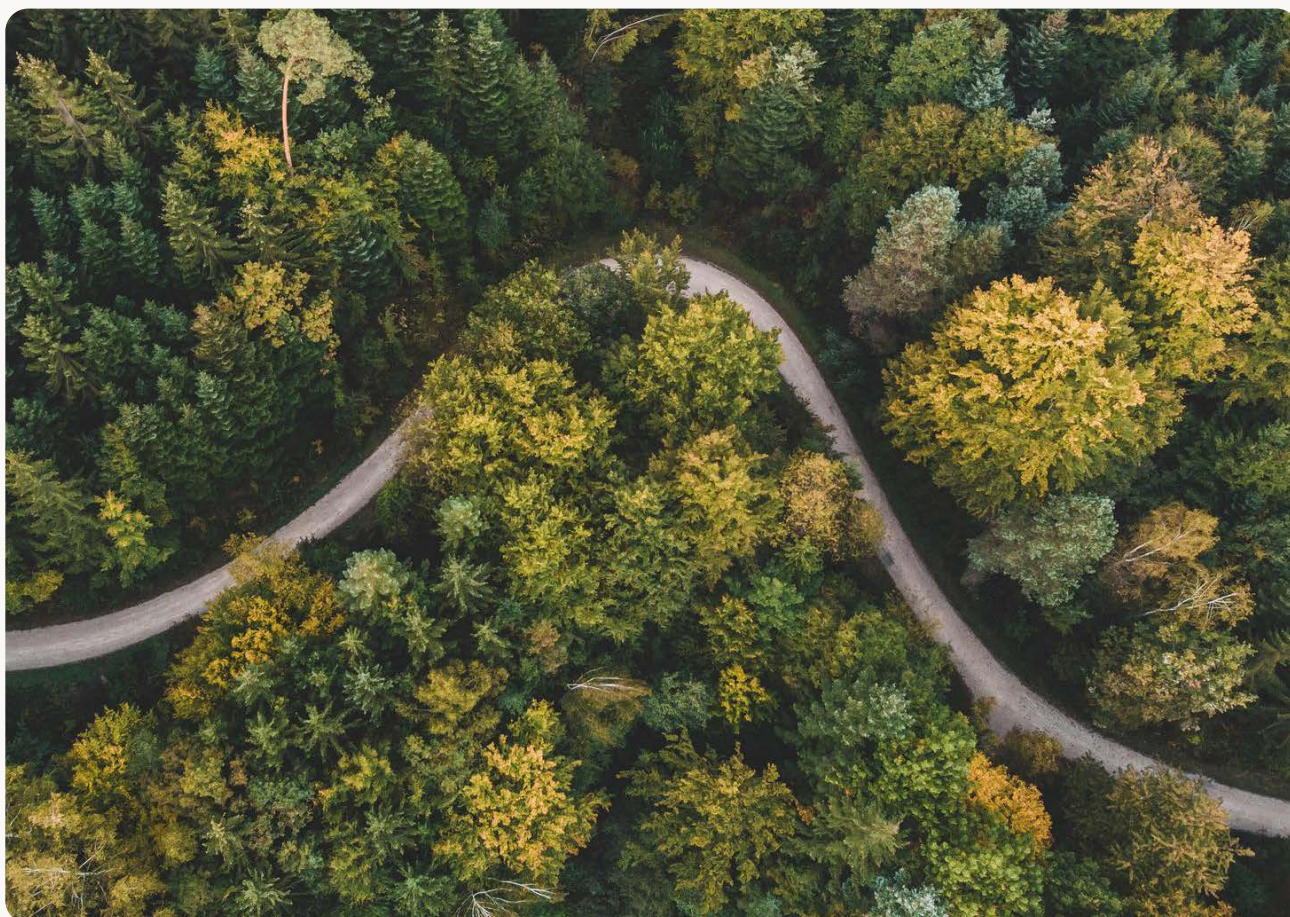
S2-4

Taking Action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions and approaches

In our operations, we engage with all material suppliers (above a value of 1m NOK) and with all higher-risk suppliers above a value of 100k NOK, via an annual questionnaire, of which more than a third of questions relate to human rights (for example, the existence of a human rights policy, and a process for handling any abuses). For companies receiving a poor score, we follow-up with management encouraging remedial action. This is also sent to new suppliers and

has already proved useful in differentiating between potential suppliers rather than purely relying on price.

In Investments, due diligence around value chain workers is more reliant on the engagement of our external fund managers. As part of our screening process, we ascertain whether fund managers include this in their investment decisions, and namely whether they are publicly aligned with OECD guidelines. Many fund managers now regularly report to us when and how they have engaged with their portfolio companies and helped drive change in approaches to workers in the value chain.



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 whistle blower 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. Major suppliers answer an annual ESG survey to ensure that their ESG work is compliant with official laws and regulations, in addition to Formue's internal values and criteria. This process is described in detail in disclosure GOV-4. Suppliers are paid according to terms stipulated on the invoice or agreement, as described in G1-6.

G1-3

Prevention and detection of corruption and bribery

Formue recognizes the importance of 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 any political influencing or lobbying activities and makes no donations to any political organizations or public officials. None of the current board members or top management team have been involved in public administration or regulatory bodies in the reporting period.

G1-6

Payment practices

Invoices are routinely paid on their specified 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.

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S2 Workers in the value chain

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