ATEA

Sustainability Report

—

2022

About this report

This is Atea's eighth annual Sustainability Report. It covers Fiscal Year 2022 (January 1 – December 31, 2022), unless stated otherwise and is a companion document to Atea's FY 2022 Annual Report.

Covering the entire Atea Group, it identifies the sustainability and responsible business-development initiatives our company undertook throughout the year in review. It is also a progress report, presenting our performance in achieving Atea's 2030 vision and the targets we've set for ourselves. The report shows how we look at the complete value chain in our operation, including how social, ethical and environmental risks are managed.

The content of this report is guided by the Global Reporting Initiative Standards and the criteria set by UN Global Compact. In addition, Sustainable Development Goals (SDGs) were integrated in this report. Atea calculates and reports greenhouse gas emissions in accordance with the Greenhouse Gas Protocol.

Accredited third parties provided verification services for sustainability and greenhouse gas emission reporting.

This report was approved by the Board of Directors of Atea ASA on March 29, 2023.

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ATEA SUSTAINABILITY REPORT 2022

Message from Atea's CEO

At Atea, our mission is "to build the future with IT" together with our employees, customers, partners and investors. By working together, we have continuously improved our performance in key areas of our operation, including responsible sourcing, environmental protection, cyber security, business ethics as well as diversity and human rights.

We remain united in growing our company in a manner that integrates sustainability at the deepest level. In August 2022, we delivered on that commitment in a new way by organizing an unprecedented event in our company's history. "**ONE Atea**" brought together all our employees at a special event here in Oslo, with our sustainability plans high on the agenda. In doing so, we made a compelling case that Atea is truly The Place to Be!

That spirit of unity helped guide us throughout 2022, as we continued to develop our programs in sustainability-infused corporate performance.

For instance, Atea once again earned a top ranking by Corporate Knights—49th place globally—as well as a top 1% ranking by EcoVadis. We also earned a Leadership Band placement among global companies analyzed by the CDP, a non-profit organization that runs the world's leading environmental disclosure platform. This marks a new personal best for our company since first reporting to CDP over ten years ago. And we achieved a new record with our Goitloop concept. Today, it's one of the largest reuse-and-recycle programs in Northern Europe. You can read more details about each of these achievements (among others) in this report.

We remain united in the face of events here in Europe, providing humanitarian support and relief to Ukraine and its citizens, standing shoulder to shoulder with our neighbors against unlawful aggression.

In times of uncertainty—colored by inflation, pandemic recovery and other challenging events—united is how we persevere. Atea's track record is proof. And it's documented in every page of this year's sustainability report.

As always, thank you for your time in reading this important document.

Steinar Sønsteby,
CEO of Atea ASA

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Steinar Sønsteby joined Atea in 1997 and was managing director of Atea in Norway in 1997-2000 and for Atea in Sweden in 2000-2002. After moving back to Norway Sønsteby was CEO of Atea in Norway until 2012 when he became Executive Senior Vice President of Atea ASA. In January of 2014 Sønsteby was appointed CEO of Atea ASA. Before joining Atea he was the CEO of Skrivervik Data AS.

Steinar Sønsteby holds a degree in Mechanical Design from Oslo College of Engineering and a Bachelor of Science in Mechanical Engineering from University of Utah (USA). He also has a finance degree from Norwegian School of Management (BI) and for Training in Management and Human relations from Dale Carnegie Institute.

Atea Stands with Ukraine

Atea condemns Russia's invasion of Ukraine and the humanitarian crisis stemming from this unlawful act. Our hearts are with all those who are impacted by these events. We stand with the people of Ukraine and the global community in calling for an immediate end to this war and respect for the Ukraine's integrity and sovereignty.

Throughout 2022, we received a growing number of inquiries about humanitarian aid, business continuity, cyber security, the protection of our employees and country-of-origin shareholder interests in our company.

In times of uncertainty — colored by inflation, pandemic recovery and other challenging events — united is how we persevere.

– Steinar Sønsteby,
CEO of Atea ASA

Here is how Atea is responding:

- Atea has no employees or operations in Ukraine or Russia. Our business is based in the Nordic and Baltic region. There are no material Russian or Belarusian shareholder interests in Atea ASA.

- We are providing both financial and operational humanitarian aid to several NGOs in the affected region. We've also opened office spaces for Ukrainian refugees and established local donation points. Atea will continue to mobilize our people and continue our unwavering support for Ukraine and for humanitarian relief.

- We are deeply committed to ensuring the safety and wellbeing of all our employees. Furthermore, we continue to monitor the situation in Eastern Europe and have contingency programs in place to ensure our capability to reliably deliver products and services to our customers.

- Atea continues to engage in close dialogue with our partners to ensure business continuity, monitoring our supply chain for delivery constraints and for social responsibility practices.

- We remain vigilant in ensuring the IT infrastructure of our customers remains safe from cyberattacks. We increased our data traffic monitoring, and we continue to work tirelessly to protect our customers and our own business from unlawful online aggression.

- Atea adheres to all government guidelines in the countries where we operate, including any regulations or sanctions imposed by the EU in connection with these unfolding events.

ATEA'S OFFICE LOCATIONS
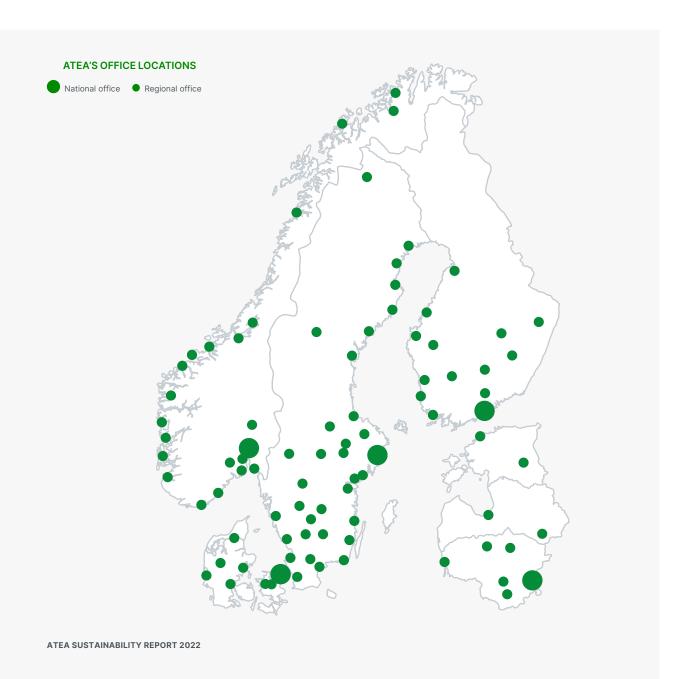
● National office ● Regional office

Atea:

One IT Partner for your Digital Transformation

Atea is the market leader in IT infrastructure and related services for businesses and public-sector organizations in the Nordic and Baltic regions. Our head office is in Oslo, Norway. Our mission: build the future with IT, together with our customers. We believe that information technology, combined with knowledge and creativity, can improve productivity and living standards for people everywhere.

With over 8,000 employees located in 88 cities in seven European countries (Norway, Sweden, Denmark, Finland, Lithuania, Latvia and Estonia), Atea has a powerful local presence in every market we serve. Atea is consistently recognized by third parties as being among corporate leaders worldwide in sustainability.

To fully realize our mission and leverage market position, it's not enough for Atea to offer world-class IT solutions. We must also design and implement a strategy for the long-term sustainability of our business. That's why Atea, customers can rely on us a full-service IT partner to support their digital transformation. We are specialists in the entire IT lifecycle: from analyzing requirements and solution design, to sustainable procurement, implementation and retirement of infrastructure assets.

Since 2010, our company has been a reporting member of the UN's Global Compact Initiative. As part of that work, we support and uphold the eight Core Conventions of International Labour Organization, the UN Guiding Principles on Business and Human Rights, and the guidelines of the OECD. Atea's *Code of Conduct* is aligned with the Global Compact's *Code of Conduct*. We are also a member of the Responsible Business Alliance. In 2022, Atea had gross sales of 46.7 billion (NOK). We are listed on the Oslo Stock Exchange (ticker: ATEA) and submit all reports as required under the *Norwegian Accounting Act*.

604,110

Units recovered using Atea's Goitloop in 2022

#1

Market leader in IT infrastructure in the Nordic and Baltic regions

#49

Overall ranking among the world's most sustainable companies (Global 100)

8,073

Full-time employees at year end

46.7

Billion NOK in gross sales

-46.1%

Emission reduction in Scope 1&2 (Since 2019)

YES

UN Global Compact Signatory (since 2010)

500+

Members of the Atea 100% club promoting circularity for IT products

100%

All of Atea's core business is ISO 14001 certified

2022 in Brief

Within the context of corporate responsibility and sustainability, here are highlights of Atea's achievements for the period under review:
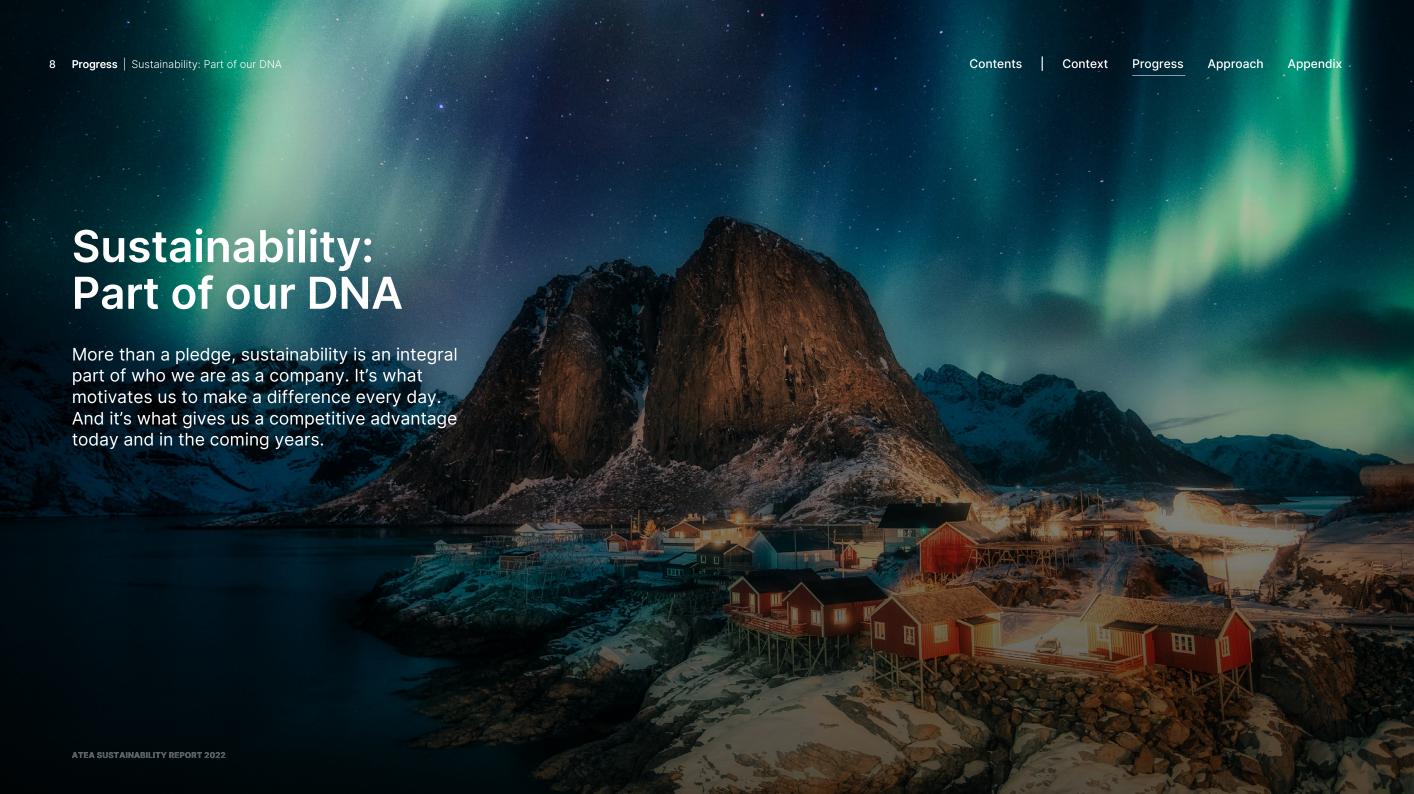
- Ranked as the world's most sustainable company in the IT Services Industry for the second consecutive year, as assessed by research and media company Corporate Knights (*Global 100 Index*). Also ranked 49th overall in that same assessment from among some 6,200 corporations with more than $1B in revenue.

- Received a Platinum rating from EcoVadis for the third consecutive year, placing Atea in the top 1% of over 100,000 assessed companies. The rating evaluates the areas of Environment, Labor and Human Rights, Ethics, and Sustainable Procurement.

- Earned a CDP A-rating: a personal best for Atea during the ten years that we have participated in this review. The ranking measures the completeness of disclosure, awareness and management of climate risks and best practices associated with the climate management, such as setting ambitious and meaningful emissions reduction targets.

- Retained all ISO certificates, ensuring Atea's full compliance with best practices and business standards in the IT industry. All ISO certificates are posted on atea.com.

- Among 40 companies listed on Oslo Børs included in the OBX ESG Index. The index demonstrates companies with the best Environmental, Social and Governance performance.

- Successfully implemented first phase of combined Atea group ISO 9001 and 14001 certifications in Atea Denmark, Sweden and Logistics. During 2023, integration activities will be finalized at remaining sites.

- Completed the certification process for Atea's anti-bribery management system according to ISO 37001.

- Conducted a third-party review of our current efforts relating to climate-related risks and opportunities, based on the Task Force on Climate Related Financial Disclosures (TCFD) framework. We will use the recommendations of the TCFD as the framework for our disclosure of climate-related financial risks.

Sustainability: Part of our DNA

More than a pledge, sustainability is an integral part of who we are as a company. It's what motivates us to make a difference every day. And it's what gives us a competitive advantage today and in the coming years.

Message from Atea's Director of Corporate Responsibility

Trends come and go, but a company's long-term success hinges on steadily achieving top performance and sustainable growth...together. That's how trust is built here at Atea. Consider how we report on environmental, social and governance (ESG) matters. Atea customers, investors and stakeholders in the corporate performance field all want to see consistent, transparent reporting focused squarely on meaningful data. So do we.

That's why this year we are expanding our corporate disclosures via our newly launched ESG Overview, available on our corporate website. It simplifies access to key information about sustainability, ensuring it remains relevant for years to come.

We've also strengthened Atea's ESG team, ensuring we remain compliant with new corporate-reporting laws, such as the European Union's new CSRD. This change means that starting in 2024, our current stand-alone sustainability report will be integrated into Atea's corporate annual report. All corporate targets and achievements will be presented in one place.

Our 2030 vision continues to guide our work. Our achievements in 2022 are testament to those efforts. Among our year-over-year goals, we focused in 2022 on meeting our 1:1 target, matching IT units sold to those recovered. I'm especially proud that we achieved an all-time record high in recovering IT units in our take-back program.

On a personal note, 2023 marks my ten-year anniversary of joining Atea. It has been quite a journey! I would like to take this opportunity to say thank you to all customers, partners, interns/students, NGOs and investors who have kept us on our toes, challenging us to deliver our very best. Thank you also to my fantastic team and colleagues here at Atea who have made every one of our collective achievements possible. I look forward to more success together in the coming years.
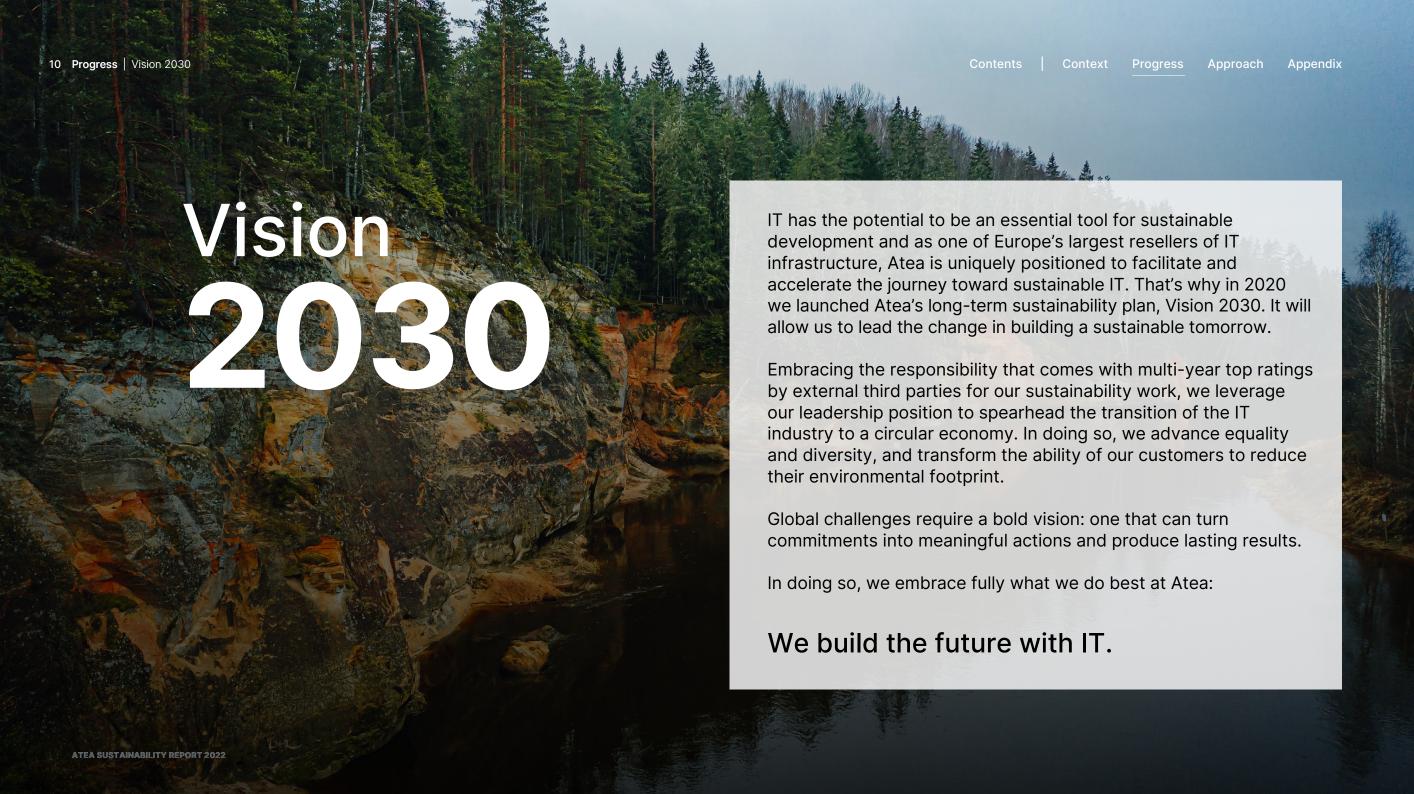
Andreas Antonsen,
Director of Corporate Responsibility

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Director of Corporate Responsibility

Andreas Antonsen joined Atea Sweden AB in 2012 as Head of Quality and Environment. He holds MSc and BSc degrees from Luleå University of Technology and executive training within business administration from the Stockholm School of Economics. In 2016, he was appointed Director of Corporate Responsibility of Atea ASA. In addition to his current role, he has been the head of sustainability in Atea Denmark and currently holds the position as acting head of sustainability in Atea Finland.

Before joining Atea, he was the Vice President of Quality and Environment for the Stockholm Metro (MTR).

Vision 2030

IT has the potential to be an essential tool for sustainable development and as one of Europe's largest resellers of IT infrastructure, Atea is uniquely positioned to facilitate and accelerate the journey toward sustainable IT. That's why in 2020 we launched Atea's long-term sustainability plan, Vision 2030. It will allow us to lead the change in building a sustainable tomorrow.

Embracing the responsibility that comes with multi-year top ratings by external third parties for our sustainability work, we leverage our leadership position to spearhead the transition of the IT industry to a circular economy. In doing so, we advance equality and diversity, and transform the ability of our customers to reduce their environmental footprint.

Global challenges require a bold vision: one that can turn commitments into meaningful actions and produce lasting results.

In doing so, we embrace fully what we do best at Atea:

We build the future with IT.

1:1

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Achieve a 1:1 ratio between IT units sold vs recovered. For each one we put on the market, we'll take back at least one unit – extending IT lifespan and preserving resources.

Outcomes 2022:

- Defined five focus categories with highest impact on environment and social sustainability in the production phase of the product life cycle: mobile phones, laptops, monitors, tablets, desktops.
- Achieved a new record-high number of units recovered using Goitloop! 604,110 units recovered in 2022, a 38% increase compared to 436,399 units recovered in 2021.
- Ensured 62% of all clients and mobile devices collected through Goitloop gained a prolonged lifecycle.
- Our customers saved 58,937 tons of CO_2 by giving IT products a second life through our Goitloop service, a 19% increase compared to 49,492 tCO_2e saved in 2021.
- 17,918 units collected by Atea Finland were handed over to recycling partners for further processing.
- 100% club exceeded 500 member organizations from both the public and private sector. The goal for all member organizations is to become 100% circular in their use of IT equipment.

- Engaged Apple's disassembly robot, Daisy, located in The Netherlands, to dismantle old iPhones and sort out components for reuse. It can handle up to 200 mobile devices per hour.

Planned for 2023:

- Establish a group aligned 1:1 progress reporting system for defined focus categories: mobile phones, tablets, laptops, monitors and desktops.

3M+
Units recovered using Atea's Goitloop since 2015

58,937
Saved tCO_2e emissions

New record

604,110
Units recovered using Atea's Goitloop in 2022

120,043
Laptops reused/repurposed

34,057
Computers reused/repurposed

15,151
Mobile phones reused/repurposed

26,223
Tablets reused/repurposed

18,687
Monitors reused/repurposed

29,978kg
Weight of cables recycled

Follow the progress

-50%

13 CLIMATE ACTION

Achieve at minimum a 50% reduction [1] in CO_2 emissions at Atea. This includes phasing out fossil fuels, reducing air travel, halving transport emissions and using 100% renewable energy.

[1] Refers to the total reduction of emissions regarding Scope 1 + 2 and the same for Scope 3 with 2019 as base year.

GHG Emissions (tCO₂e)
Scope 1&2 emissions

5,417.5
-50% target

5,841.7
year result, 2022

0.0

10,835.0
base year, 2019

Outcomes 2022:

- Achieved Scope 1 and 2 reduction by 46.1% from base year and 5.7% reduction compared to 2021.
- Achieved Scope 3 reduction by 3.5% from base year and 7.7% reduction compared to 2021.
- Produced 253,594 kwh by solar panels in Växjö, Sweden.
- Increased share of renewable electricity used in Atea operations to 86.9%, thus increasing the share of renewable energy to 57.9%.
- Ensured all our offices and data centers are covered by our Environmental Management System (EMS), which is ISO 14001 certified.
- Boosted efficiency (replacement of power modules and software update), of the data center in Umeå, Sweden, thus lowering the PUE value to 1.15.
- Atea Logistics chose to collaborate with Zero Mission to climate compensate 800 tCO₂e emissions resulting from downstream transportation during the financial year 2021.

This is done through efficient stoves in the Gold Standard Sun stoves project, ADES (7116).
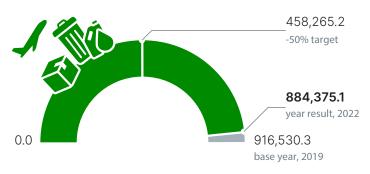
Planned for 2023:

- Complete the process of updating the SBTi target to reflect our ambition that is in line with the 1.5°C target, as well as developing a net-zero target.
- Complete integration activities across Atea, to achieve a single global ISO 14001 certificate for the combined Atea Group covering all businesses and sites.

Scope 3 emissions

458,265.2
-50% target

884,375.1
year result, 2022

0.0

916,530.3
base year, 2019

-46.1%
Emission reduction in Scope 1 and 2

-3.5%
Emission reduction in Scope 3

CDP DISCLOSER 2022

CDP score A- improved from B in 2021

[Follow the progress](#)

TP2B

5 GENDER EQUALITY

Our vision is to be "The Place to Be" for our employees, customers and partners. A diverse Atea with equal opportunities and a culture where we include and appreciate different experiences, competences and perspectives will make us best equipped to serve our customers.

Outcomes 2022:

- Continued to encourage more women to work in the IT industry by arranging activities to promote gender balance.
- Invested employee development with a range of different training efforts and certifications to build competence within relevant areas and create more opportunities for engaging in interesting assignments with Atea customers.
- Ensured all employees had yearly performance appraisals where there was follow up on the work environment and wellbeing. In Sweden 97% of the employees had a yearly development dialogue.
- Gathered around 7,000 employees from Nordic and Baltic regions for Atea's first internal "TP2B" event.
- Gender split in Board of Directors has remained the same for three years in a row: 3 out of 8 members are female.
- During 2021, Atea aligned group wide approach for customer NPS score measurement and implemented joint platform. The score gives us indications of Atea's

development and of our customers' satisfaction with Atea. NPS score in 2022 has slightly increased compared to 2021.

Planned for 2023:

- Group wide diversity, inclusion and anti-harassment policy implemented in Q1 2023.
- Create and implement group aligned process on how to measure and create corrective actions to eliminate gender pay gap.
- Managerial training on inclusive leadership during first half of 2023 for 300 managers.

8,073
Full-time employees
at year end

29.92
Customer
NPS score

Gender distribution of enterprise headcount

74% Male | **26%** Female

Gender distribution of managerial positions

73% Male | **27%** Female

Employee diversity by age group

17% <30 years | **54%** 30-50 years | **29%** >50 years

[Follow the progress](#)

1M+

8 DECENT WORK AND ECONOMIC GROWTH

We will accelerate on the journey toward sustainable IT by leveraging the purchasing power of 1 million IT users. This we will achieve by increasing the commitment of entire organizations, including ourselves, through our collaboration platforms.

Outcomes 2022:

- Surveyed the Nordic market's sustainable IT via ASF's online survey of stakeholders (a majority of which are IT decision makers). It annually investigates current and future priorities of Nordic IT buyers regarding sustainability in procurement and identified obstacles to—and current practices around—sustainable IT. There were 493 survey respondents to the most recent survey: a small decrease from last year and attributed to its new format.
- Among the insights, the survey showed that on a 1-to-5 scale, respondents prioritized IT sustainability in their own organization at an average rank of 3.8.
- Gathered the Atea Sustainability Forum in three cities simul-taneously for the first time (as well as online), providing a true Nordic experience.
- Organized and facilitated several meetings within the network Leadership for Change, including the full-day Learning Academy in October that featured peer-to-peer inspiration and workshops around best practices.

- Participated at two ASF Academy webinars, launched in 2022 to provide insights to the most progressive customers to support their efforts in accelerating toward more sustainable IT.
- Produced (in partnership with the ASF Advisory Board and industry representatives) a roadmap for short-term actions to reach a circular and net-zero IT sector by 2050.
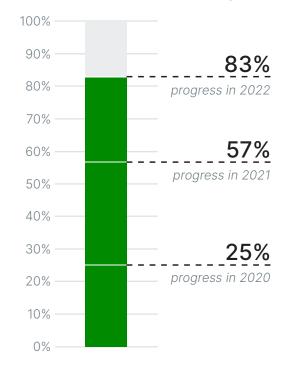
Planned for 2023:

- Expanding the Leadership for Change network and strengthening their role as frontrunners within sustainable IT.
- Publishing two sets of best practices building on successful implementations by the members of the Leadership for Change.
- Finalizing the details for the actions in the ASF roadmap and start the implementation in the second half of 2023.
- Atea Sustainability Forum will once again be a Nordic event. This time, participants will also include those in Helsinki.

Progress towards 1M of engaged IT buyers in Nordic and Baltic regions

83%
progress in 2022

57%
progress in 2021

25%
progress in 2020

ATEA SUSTAINABILITY FOCUS

Time for climate accountability

> **Read more**

100:1

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

Make our carbon handprint 100 times larger than our carbon footprint, by leveraging the power of IT solutions.

1,216,523
handprint, tCO$_2$e

890,218
footprint, tCO$_2$e

Outcomes 2022:

- Launched Atea's Sustainability Ambassadors Program to strengthen the sustainability competence within Atea Group. This will help us to continue moving forward in the digitalization of our society and help customers reduce their emissions.
- Atea Norway launched The Sustainability School. It consists of everything from sustainability and cloud services, hardware recycling, transparency and follow-up of supply chains—and, of course, our own products and services.
- Signed an agreement with Microsoft to accelerate Atea's sales of cloud services and offerings. The three-year agreement enables both Atea to build more than 25 new services on the Azure platform and Atea's customers to reduce their carbon footprint through migration to modern datacenters based on cloud technologies.
- Adopted a conservative approach in calculating this handprint-to-footprint ratio, especially regarding services and products within our Digital Workplace.

Planned for 2023:
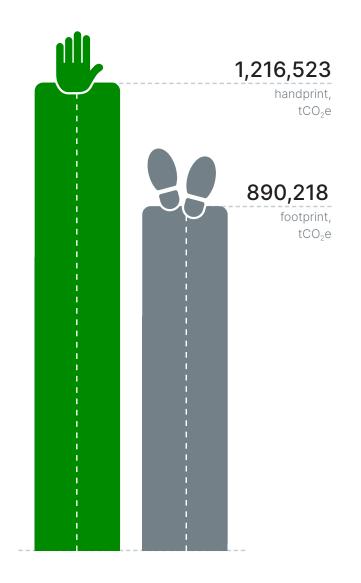
- Atea will work on developing methodology (with a third-party consultant) to calculate our carbon handprint relating to Information Management and Hybrid Cloud services.
- Atea will continue to improve methodology for carbon handprint calculation relating to Digital Workplace to make data more reliable and comparable between the years.

45.51min
Average length of meetings held in Atea's Digital Workplace

7.1bn
Minutes spent in meetings powered by Atea's Digital Workplace

Sustainable Development Goals

Agenda 2030 was established by the United Nations in 2015 as a universal call to action to end poverty and set the world on a path of peace, prosperity and opportunity for all on a healthy planet. The agenda consists of 17 Sustainable Development Goals (SDGs) and 169 underlying targets to be achieved by the end of this decade. It's been adopted by all UN member states.

At Atea, we are committed to leverage our knowledge and business to contribute to the transformations needed to achieve the SDGs. We have identified six primary goals where our efforts have the greatest potential for impact. These are based on an assessment of the underlying targets to each SDG and their link to our identified material sustainability topics.

Sustainability and Governance at Atea

Atea's commitment to sustainability is embedded in our purpose, vision, business model and strategy. We've built robust governance mechanisms at all levels of the business to ensure we hold ourselves accountable.

Corporate Responsibility

The Group Corporate Responsibility department is responsible for developing and coordinating Atea's sustainability strategy, ensuring company stays aligned and informed on key risks, emerging trends and stakeholder priorities. To meet increasing stakeholder interest in environmental, social and governance (ESG) topics, we are integrating the measurement and management of ESG topics into our strategic planning and operations.

Sustainability Committee

In 2020, the board established a Sustainability Committee to further integrate sustainability into Atea's business, thus bolstering our corporate governance. This Committee helps the Steering Group fulfill its responsibility for oversight of relevant sustainability and ESG policies, risks, strategies and programs within the company. Risks monitored by the Sustainability Committee are discussed within the group on a quarterly basis. They are also discussed regularly with the Board that receives feedback on the progress of setting and achieving set targets and goals. The Committee is tasked to formulate the strategic priorities to be included in the

company's strategic plan, with a specific focus on circular economy, climate and human rights.

Steering Group

This consists of members of Atea's corporate management. It oversees Atea's overall performance within sustainability, assessing risks, including climate-related risks, and opportunities to contribute to sustainable development. The Steering group sets and reviews Atea's Sustainability Strategy, policies and oversees the effective implementation thereof. The Chief Financial Officer and Chief Operating Officer have overall responsibility for managing the steering group.

Atea ASA Board

This is Atea's highest ranking decision-making body. It is responsible for corporate governance, including sustainability, annual review of compliance function and approves changes to Atea's *Code of Conduct*. The board reviews Atea's overall compliance and oversee the progress of our Enterprise Risk Management methodology (including climate-related risks) and Atea's overall performance against set targets.

Outcomes in 2022:

- Established the Director of Sustainable Business position, tasked to translate the long term 2030 Vision into actionable strategic priorities for business functions with a specific focus on circularity, decarbonization and human rights. The Director chairs the Sustainability Committee and drives execution by coordinating the sustainability programs across the Atea Group.

- Fully integrated sustainability goals in the group strategic business plan, a 3 year plan with both financial and non-financial goals that sets the strategic priorities for the whole Atea group. The 2024 plan has a clear focus on executing on the circular transition, while continuing to deliver results on all other ESG goals. Performance is monitored and reviewed at both country level (management team) and group (senior management) level.

- Launched the ESG Overview, a page for investors, rating agencies and stakeholders to find all Atea's ESG-related information.

Compliance

At Atea, our vision is to be a place where employees, customers and technology partners collaborate to build the future with IT. That can only be achieved if we first have a trusted relationship with the people who bind us together with a commitment to social responsibility.

Atea's *Code of Conduct*

This is the foundation to how we work at Atea. It provides a summary of the values, ethical guidelines and basic rules that govern our conduct and decision making. It sets the principles with which Atea employees act toward each other and toward outside stakeholders. It is the personal responsibility of every employee of the Atea group and each of its subsidiaries to review, sign and follow the *Code of Conduct*. This responsibility to abide by the *Code* also pertains to all who act on behalf of the company, including contracted consultants. The *Code* also reflects Atea's commitment to the UN Global Compact's Ten Principles and the UN Guiding Principles on Business and Human Rights. Everyone working for Atea has an individual responsibility to ensure that business practices adhere to the *Code*. It is available in all languages where Atea conducts business to ensure that it is understood fully across the company's workforce.

According to Atea's *Code of Conduct* and its companion *Supplier Code of Conduct*, all Atea employees, suppliers and other external parties are encouraged to report suspected violations of law. Doing so is collectively referred to as "compliance concerns." These may relate to corruption, fraud, questionable accounting, deficiencies in the internal controls, auditing, environmental, occupational health and safety, human rights matters, or other matters that could constitute a breach of law, seriously affect vital interests of the company or personal health and safety. Employees are encouraged to report compliance concerns directly to their manager, manager's manager or the compliance officer in their respective county/business unit. Compliance concerns can also be reported via the Atea Whistleblowing service. Any report sent through web-based reporting channel is received by a third-party law firm, which handles all reports discretely and confidentially: giving the reporter total anonymity. The whistleblowing service is available 24/7, 365 days a year.

Atea ASA Board
- Overall responsible for corporate governance.
- Annual review of compliance function.
- Approves changes to *Code of Conduct*.

∧

Atea ASA Audit Committee
- Oversees group compliance function, on behalf of the Board.
- Receives reports from Compliance Committee on compliance events and whistleblower cases.
- Recommends changes to the *Code of Conduct* (to the Board).

∧

Group Compliance Committee
- Responsible for ongoing assessment of compliance programs and their communication / effectiveness.
- Final line of guidance to employees.
- Reviews reports from local compliance officers on compliance events, and reports to Audit Committee.
- Follows up on whistleblower events and reports to Audit Committee.

∧

Local Compliance Officers
- Responsible for following up that local organizations are acting in compliance with the *Code of Conduct*.
- Second line of guidance to employees with questions about the *Code of Conduct*.
- Reports ongoing compliance events and risk factors to the group via quarterly report.

∧

Local management
- First line of guidance to employees with questions about the *Code of Conduct*, and how it applies to specific situations.

Compliance Committee

Reported compliance concerns are handled and monitored by the Atea Group Compliance Committee, comprising the Chief Compliance Officer (Group CFO), the Director of Corporate Responsibility (Group), Head of Group GRC (Group) and a Compliance Officer from the countries/business units.

Every quarter, the Group Compliance Committee receives a report from the compliance function in each country on:

1. key compliance issues and the steps taken to address them;
2. high-risk areas and the risk mitigation actions taken;
3. regarding significant compliance investigations; and
4. details and factual reports on relevant investigations in the industry or comparable businesses, and in case of corruption, the case immediately receives a report from the relevant local compliance function.

The Group Compliance Committee is responsible for coordinating risk management (including climate risks) across all business areas.

Audit Committee

This committee oversees the group compliance function and group compliance committee, on behalf of the Board of Directors. The Audit Committee receives reports from the Group Compliance Committee on compliance events and whistleblower cases. It recommends changes to *Code of Conduct* to the Board of Directors.

Anti-bribery and corruption

Atea takes a zero-tolerance approach to bribery and corruption and we are committed to conducting business in an honest, ethical manner. Atea has an anti-bribery and corruption program and aims to ensure ISO 37001 compliance (global anti-bribery management system) within all countries where it operates, including key elements from the U.S. *Sentencing Guidelines* and the UK *Bribery Act Adequate Procedures*.

ALL

Employees need to take the mandatory training for compliance with our Code of Conduct

24/7

Atea's whistleblowing service

100%

All of Atea's core business completed ISO 37001 certification of anti-bribery

Outcomes in 2022
During the period in review, Atea:

- Received nine reports to Atea's whistleblower system, five of which upon investigation were considered to be actual whistleblower cases.

- Retained its certificates within ISO ensuring Atea remains compliant with best practices and business standards in the IT industry. All ISO certificates are posted on atea.com.

- Achieved a 96% completion rate of its workforce training in support of the *Code of Conduct.*

- Completed the certification process for its anti-bribery management system according to ISO 37001.

- Implemented an environmental and quality management system, accredited according to ISO 14001 and 9001: an efficient process-oriented way of working together. We are also certified for ISO 20000-1 and ISO 27001, ensuring compliance with best practices and business standards in the IT industry.

Climate Impact Mitigation

The recent energy crisis in Europe and elsewhere highlights how much work still remains to be done in the area of climate change mitigation and to meet the objectives of the Paris Agreement and the 1.5°C goal.

At Atea, we believe IT plays a vital role in helping to address the potentially irreversible impact of climate change and its subsequent societal shifts. That's why we launched Atea's long-term sustainability plan, Vision 2030. This vision will allow us to be a step ahead and lead the change in building a sustainable tomorrow. In doing so, we fully embrace what we do best: building the future with IT.

The 2030 vision includes an ambitious target curbing our climate emissions. We already work actively with the transition to renewable energy at our premises, data centres and towards an electrified car fleet. In 2022, we achieved 46.1% reduction in Scope 1 and 2. We will keep targeting an increase in the share of renewable electricity towards 100% to move towards carbon neutrality in our own operations.

In 2022, we broadened our Scope 3 reporting to include more categories. This approach provides us with a more complete view of the total environmental impact generated by our business. As part of our increased focus on data, we are reviewing our GHG emissions methodology and data systems to create better visibility into reduction opportunities as our business both grows and decarbonizes. This will also help our customers understand the actions they can take to meet their climate goals.
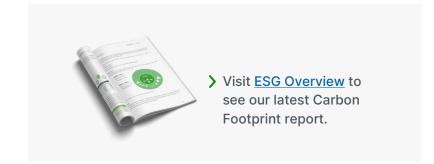
Climate risks

There is a growing demand among investors and political decision makers for greater transparency regarding climate risks and how they are managed. We agree. That's why in 2022, Atea conducted a third-party review of our current efforts relating to climate related risks and opportunities, based on the Task Force on Climate Related Financial Disclosures (TCFD) framework. We will use the recommendations of the TCFD as the framework for our disclosure of climate-related financial risks.

Atea identified several climate-related risks and their potential business impacts. They are monitored by the Sustainability Committee (quarterly from 2022) with support from the Group Risk and Compliance function, if deemed necessary risks and/ or suggested risk mitigation efforts are raised with senior management.

Examples of identified risks and impacts:

- **Physical risks**, such as extreme weather conditions that potentially could cause disruptions in our supply chain and/or damaged physical assets.

- **Regulatory risks**, such as carbon tax and product-oriented regulations that could result in increased liability and/or compliance costs.

- **Reputational risks**, relating to our business activities potentially causing damage to our brand value and/or lost revenue.

- **Market risks:** Technology, products, services and assets may become obsolete and/or linked technological break- throughs and disruptions.

> Visit **ESG Overview** to see our latest Carbon Footprint report.

Investing in Human Capital

Atea's long-term success hinges on the people it employs. They are central to Atea as "The Place to Be" for employees, customers and vendors. We strive to attract the best to create remarkable solutions. To get there, Atea ensures that it provides healthy, safe conditions in the workplace, and that it gives everyone an equal opportunity to succeed and thrive within its corporate culture.

Wellbeing, Health & Safety

At Atea, we encourage our employees to participate in activities related to health and wellbeing. We believe that all people have the right to a healthy and safe workplace. Therefore, we ensure that working conditions within our organization meet or exceed legal requirements in every country in which we operate. We also comply with the conventions of the UN Global Compact and the International Labour Organization. Hazards are identified and monitored to prevent accidents and occupational illness. Workplace guidelines are monitored to ensure a healthy, safe environment. It also encourages participation in athletics through Atea-sponsored sporting events.

Diversity, Equality and Inclusion

Promoting diversity, inclusion and gender equality in the workplace: these are core values at Atea. Our employees are respected and valued for their skills and abilities — no matter their gender, nationality, religion, age or physical mobility. A diverse workforce is one that reflects the society in which it operates. To increase diversity in our industry, Atea supports university focused initiatives that encourage women to choose engineering and technology-oriented education. We regularly conduct visits to secondary and post-secondary schools to attract more students, regardless of gender, to consider a career in IT. This includes initiatives that encourage more women in the IT field at all levels, which is an ongoing challenge in IT sector.

Atea also strives to prevent workplace discrimination. Our efforts are consistent with the prescriptions of the Anti-Discrimination Act.

Atea's management promotes equality of opportunity for all employees and our company. Atea has zero tolerance for discrimination and sexual harassments in the workplace.

Atea believes that all people — regardless of gender identity — are equal to one another. We have a responsibility to ensure that all have an equal opportunity to work hard and have a rewarding career.

At Atea, we live and act according to our values, which also support us all in contributing to an inclusive workplace. Inclusion is active work, focused on behavior and treatment. Everyone can be involved in and influence this effort.

Development

At Atea, we encourage our employees to continuously develop both within current role and internally to other roles. The annual development dialogue gives the employee together with the manager a possibility to discuss their work effort and gain understanding for its part in a greater context. It is a prepared, structured discussion for both employee and manager with aim to set individual action and development plan for the employee.

> Diversity and Inclusion Policy

> Anti-discrimination & harassment policy

EU Taxonomy

The EU Taxonomy is an EU classification system establishing a list of environmentally sustainable economic activities. It aims to help the EU scale up sustainable investments by requiring companies to report the share of their turnover, capital and operational expenditure associated with environmentally sustainable economic activities. The final Taxonomy Regulation introduced a new disclosure requirement for companies already required to provide a non-financial statement under the Non-Financial Reporting Directive. The EU Taxonomy and related reporting requirements have not yet been implemented in Norwegian law. However, Atea has begun the process of analyzing our activities and is prepared for the new legislation.

The European Commission has adopted delegated acts pursuant to Article 10(3) and Article 11(3), of the Taxonomy – covering the environmental objectives Climate Change Mitigation and Climate Change Adaptation – and we have

assessed our economic activities based on the descriptions and Technical Screening Criteria contained therein.

The screening was performed with the support from relevant departments with insight into those activities and related financial data.

Looking Forward
In 2023, we will focus on adjusting the screening process and reporting framework to fully align with the Disclosures Delegated Act. We will evaluate our current state and opportunities to increase the share of taxonomy-eligible activities, and begin the transition towards taxonomy-alignment of our taxonomy-eligible activities.

Atea also assessed economic activities for future taxonomy-eligibility based on descriptions in the publications by the Platform on Sustainable Finance, which are expected to be

adopted into delegated acts soon. These economic activities can potentially contribute to the environmental objective The Transition to a Circular Economy. Based on our assessment, a further 2.9% of our turnover could be taxonomy-eligible when new delegated acts are adopted.

Disclosure on economic activities covered by the EU Taxonomy
All companies subject to this requirement will include a description of how — and to what extent — their activities are associated with activities outlined in the Taxonomy. This include the proportion of turnover, CAPEX and OPEX that is taxonomy-eligible, taxonomy-aligned, and non-taxonomy-eligible.

The results are published in the table below, and include computer programming, consultancy and related activities, as well as data processing, hosting and related activities.

	Total (NOK million)	Share of taxonomy-eligible activities (%)	Non-Taxonomy-eligible activities share of total (%)	Taxonomy-aligned activities share of total (%)
Turnover	32,397	25.1%	74.9%	0.0%
Operating expenditure [1]	133	0.0%	100.0%	0.0%
Capital expenditure	397	27.4%	72.6%	0.0%

[1] The definition of OPEX in the Taxonomy differs from the one Atea uses. We have chosen to use a part of "Other operating costs" relating to our premises as the denominator, as this is the OPEX number in our financial accounts most closely related to the Taxonomy definition. Separating out taxonomy-eligible OPEX costs has not been possible this reporting period.

Cyber Security

Security is the cornerstone of technical infrastructure in a digitized world.

Atea continuously monitors our own infrastructure for possible breaches. We also keep up-to-date with threat online landscape worldwide. Since most cyber threats target individual users today, we continuously educate our employees and run phishing campaigns to improve awareness and minimize incidents.

Since the implementation of European GDPR, Atea takes a leadership position in explaining how cyber security applies to our work, and why such initiatives help protect people. By being on the frontline for our customers, we also regularly participate in governmental advisory boards in support of national cyber security.

In 2022, Atea completed a strengthening of security on the operational side of our organization to meet future security risks and challenges. We've also focused on reducing Atea's digital footprint, and designed future security architecture based on Zero Trust techniques and best-practice user access. These steps increase security, simplify steps and improve usability.

Going forward, this modern risk-management approach entails:

- Extending our ISO 27001 certification to include internal customer-facing services to meet expectations of those customers.
- Conducting mandatory trainings on GDPR and Security Awareness, which must be completed by all Atea's workforce.
- Starting a new security culture program that will allow specialized awareness for different roles within Atea.
- Continuing to improve on digital footprint posture from an outsider's perspective with the goal to be on a healthier level than our competitors.
- Continuing the development and implementation of data privacy measures according to GDPR, Schrems II and EDPB guidelines.

> Data Privacy Policy

> GDPR commitment

> Information regarding Schrems II

> Information Security Risk Management Policy

In IT, the security landscape is always changing, so it's imperative that we continually improve safeguards, including enhanced information handling techniques.

– *Jan Erik Isaksson,*
Group CISO

Stakeholder Engagement and Materiality

Continuous dialogue with Atea stakeholders in the IT sector — and beyond — is crucial for inclusive, sustainable growth. Without feedback of our stakeholders, we'd risk missing out on valuable insights and opportunities for improvement. We interact with our stakeholders as often as we can: through customer and partner meetings, employee- and customer-satisfaction surveys, as well as at company events, job fairs, joint audits and on social media.

Our sustainability strategy and reporting process each plays a crucial part in maintaining this communications loop. To prioritize sustainability topics, Atea regularly conducts a stakeholder dialogue and materiality assessment in which we capture perspectives and opinions of various stakeholders in relation to our operations. Atea's most important stakeholders are: customers, employees, investors, media, NGOs, society and suppliers.
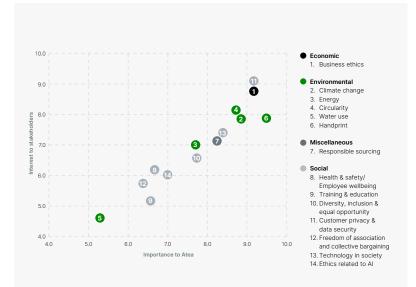
Atea's recently updated Materiality Assessment includes sustainability topics that were selected based on previous

assessments, current industry and reporting trends, benchmarks and the reporting framework GRI Standards.

The results of employee surveys for several markets were analyzed, along with the latest Atea Sustainability Focus report, in which a wide range of customers are represented.

To further gain insight into the views and opinions of our stakeholders, a number of interviews were conducted, including with investors and Atea management. Based on the findings, internal workshops were held, which resulted in the identification of Atea's material sustainability focus areas. These can be seen in the materiality graph.

These material topics will be at the core of Atea's sustainability reporting moving forward and are closely connected to the Atea 2030 vision and to our five overarching sustainability targets. To ensure the relevance of our sustainability strategy and reporting, Atea aims to update the materiality assessment every third year.

Economic
1. Business ethics

Environmental
2. Climate change
3. Energy
4. Circularity
5. Water use
6. Handprint

Miscellaneous
7. Responsible sourcing

Social
8. Health & safety/ Employee wellbeing
9. Training & education
10. Diversity, inclusion & equal opportunity
11. Customer privacy & data security
12. Freedom of association and collective bargaining
13. Technology in society
14. Ethics related to AI

Outcomes in 2022

- Data security and customer privacy were found to be an increasing priority from both Atea's and our stakeholders' perspective.
- Other sustainability topics which were emphasized by our stakeholders include Atea's impact on climate change, which is closely connected to the matter of circularity.
- Identified material topics: Business ethics, Climate change, Circularity, Handprint, Responsible sourcing, Customer privacy & data security and Technology in society.

Building the Future With IT

In addition to Atea's corporate-wide efforts to achieve greater sustainability, great strides are also being made on a country-by-country basis to help build the future with IT.

Roadmap for a circular, net-zero IT sector

With their 2021 report, the ASF Advisory Board gathering leading private and public IT buyers in the Nordics, concluded that the sustainable transformation of the IT industry was not going fast enough. To speed up change, they invited actors from the IT industry to produce a roadmap for a circular and net-zero IT sector. This is a unique project, featuring dialogue between buyers and brands. Through a set of roundtables kickstarted in 2021 and then intensified in 2022, leading industry stakeholders and buyers identified key obstacles and enablers for the twin circular and net-zero transition. They agreed on a joint vision and pinpointed six critical commit-ment areas. These included implementing net-zero targets in tenders and increasing the demand for refurbished equipment. Actions that have the greatest impact will be jointly monitored from 2023 onwards. This project has significant scaling poten-tial, made possible through a growing network of committed buyers within Leadership for Change.
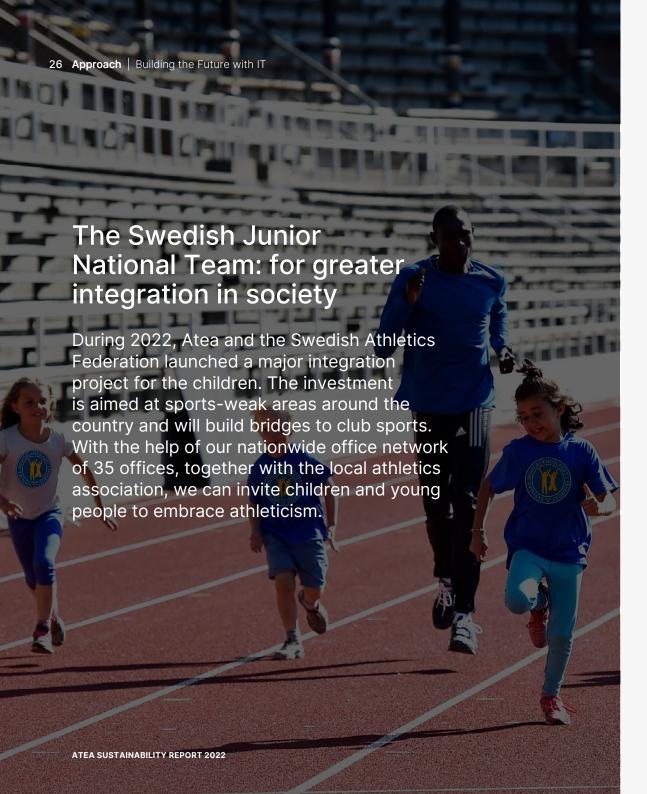
Becoming part of the 100% Club

Employees of Atea Denmark are deeply passionate about working together with other companies to ensure a more sustainable future for us all. Recycling IT equipment is where a significant difference can be made. Thus, a major milestone was achieved in 2022 when Atea Denmark became a member of the 100% Club. That's a network of committed companies working together on reducing IT waste and increasing recy-cling efforts.

The 100% Club helps raise awareness about the importance of responsible disposal of electronic waste. By educating both member companies and the wider community about the negative environmental impacts of improper disposal, the club creates positive change and promotes a more sustainable future for all.

I am proud of the concrete commitments from the buyers-brands dialogue within Atea Sustainability Focus. We truly are faster, together!
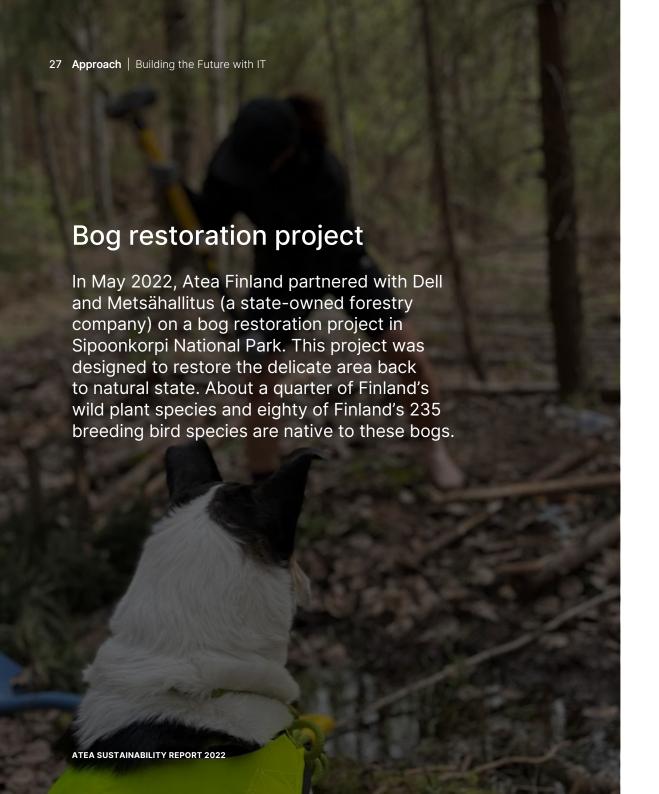
– Chiara Selvetti,
Director Sustainable Business

The Swedish Junior National Team: for greater integration in society

During 2022, Atea and the Swedish Athletics Federation launched a major integration project for the children. The investment is aimed at sports-weak areas around the country and will build bridges to club sports. With the help of our nationwide office network of 35 offices, together with the local athletics association, we can invite children and young people to embrace athleticism.

Extensive sustainability training

Promoting diversity, inclusion and gender equality in the workplace: these are core values at Atea. With aim of being the Nordic hub for sustainable IT, Atea Norway seeks to ensure all of Norwegian customers have a competent, knowledgeable interlocutor within Atea when it comes to sustainable IT. To achieve this, a mandatory, extensive sustainability training program has been implemented for all 2,000 employees. This three-month program is delivered at Atea Norway's own sustainability school and covers a wide range of topics related to sustainability in the IT industry. Employees are learning how to help customers work more efficiently with automated systems and be data driven with sustainability. They also learn about the importance and advantages of recycling hardware and of course what Atea is doing to walk the sustainability walk ourselves.

Through this training, employees have gained knowledge and skills necessary to meet the sustainability needs and demands of customers in Norway. This focus on sustainability and the development of internal competences allows Atea Norway to play a leading role in driving sustainability within the IT industry.

Bog restoration project

In May 2022, Atea Finland partnered with Dell and Metsähallitus (a state-owned forestry company) on a bog restoration project in Sipoonkorpi National Park. This project was designed to restore the delicate area back to natural state. About a quarter of Finland's wild plant species and eighty of Finland's 235 breeding bird species are native to these bogs.

Humanitarian and charity-focused efforts

Thanks to technology today, a connected world can lift millions out of poverty. It can empower disadvantaged citizens in every part of the world, giving them a renewed sense of identity and the ability to participate fully in the global economy. It can bring hope. It changes how we interact, learn, travel and live our lives. And it closes the gap of large geographical distances, so people no longer must travel far just out of necessity.

Entrepreneurs for Peace movement

Atea Global Services (AGS) joined with approximately 100 businesses in Latvia in the "Entrepreneurs for Peace" movement. This effort serves to help Ukraine fight against Russia's aggression and ensure peace for all of Europe. Since March 2022, AGS has contributed financial and other resources to the cause, particularly in supporting Ukrainian refugee families living in Latvia. Highlights:

- Engaged a team of volunteers in cargo coordination, assembly and sorting.
- Collected 28,000 EUR in donations.
- Donated more than 40 laptops and seven stationary PCs so that school-age Ukrainian children living in Latvia can continue their education remotely.
- Reallocated funds from teambuilding budgets to provide necessities and household goods.

Atea's helping hands

Atea's Helping Hands is an employee-generated fund designed to help build a better world together. Under this program, individual donations are matched by Atea on a 1:1 ratio, thus doubling the impact. During the Christmas season, Helping Hands serves as a powerful substitute in place of traditional gift exchanges. As of October 2022, over 730 employees were monthly donors committing and contributing to a range of causes, including:

- In connection with TP2B in Oslo 2022, donations were made to Congo's Kyeshero Hospital, in support of their work with women who have suffered sexual violence.

- Financial gifts to Kenya's Kenswed Academy in Kenya, to support 35 students who start the four-year upper secondary education this spring, as well as the 25 students who became the first to attend the school's post-secondary program last summer.

Donating computers to the Ukrainian refugees

Atea Finland spearheaded a new program to collect and donate computers to Ukrainian refugees located in Lahti. Donated equipment was rerouted from Atea's recycling service (Goitloop), and instead found a new lease on life helping people build better lives for themselves.

Spready the joy of giving

During the 2022 Christmas season, Atea Norway continued its long tradition of supporting charitable causes, donating 500,000 NOK to a range of foundations and organizations chosen by employees.

Upskilling unemployed citizens

Atea Denmark, Microsoft and the Aarhus municipality joined forces in 2022 to create a six-week course to help upgrade the IT skills of unemployed citizens in the area. Of the 28 individuals who participated in the program, 26 gained employment: a 93% success rate. Among these participants, 20 received Microsoft certification as part of a career change. The course is now being repeated, with an expected 90 partic-ipants at the introduction meeting for a new program.

Teaching youth about the importance of recycling digital devices

Also in Atea Denmark, a program was developed in 2022 to educate children (ages 10-15) about the importance of recycling and how it positively impacts the environment. With hands-on activities and interactive lessons, students learn about the benefits of recycling and how they can take action in their own community. The program is free of charge.

Atea Sustainability Focus

Atea Sustainability Focus (ASF) leverages the power of the Nordic IT buyers to drive change globally. Featuring a report produced annually, ASF provides the Responsible Business Alliance (RBA) and fellow members with an annual focus and a set of recommendations. The focus and recommendations are assembled by an advisory board that collects examples of sustainability and IT excellence from across the region. The specific recommendations provide a balance between deep ambition and what's achievable. This annual approach helps the industry to focus its resources and progress faster to close that gap.

Stakeholder dialogue
Nordic IT buyers identify key sustainability aspects through an online survey and dialogues.

Recommendations
The ASF Advisory Board, comprising leading IT and sustainability professionals from Nordic companies, municipalities and organizations selects a focus area and formulates recommendations.

Industry analysis
Sustainability experts conduct an industry analysis to identify the gaps between the expectations of the Nordic buyers and current status.

Handover to industry
RBA and its member companies decide on specific activities to implement the recommendations from the ASF Advisory Board.

Atea Sustainability Focus provides multiple platforms to become part of the solution.

Leadership for change

The ASF Leadership for Change group is a network of major Nordic IT buyers who are committed to promoting sustainable IT through their procurement and consumption choices. The network aims to establish and share best practices in IT procurement and consumption.

Atea Sustainability Forum

Atea Sustainability Forum is a Nordic event that gathers IT buyers and representatives from the global IT industry to collaborate and find paths to a more sustainable production and use of IT. In 2022, the event took place in Stockholm, Oslo and Copenhagen simultaneously.

ASF Roadmap

The ASF roadmap was initiated by the buyers in the ASF Advisory Board in order to speed up the transformation to a circular and net-zero IT sector. In collaboration with the IT industry, the roadmap outlines a number of actions that will be undertaken by Nordic IT buyers, evaluated and scaled if successful.

Responsible Sourcing

The IT industry's supply chains are long and complex and they provide livelihoods for millions of people. Working to protect human rights, to ensure ethical and responsible working methods, and to reduce the climate footprint in the supply chains — all of this is as challenging as it is urgent. We must systematically use our influence to create positive, lasting change.

Atea has a special position in the supply chain. While we are not a manufacturer and don't exercise direct influence on working conditions, we can advocate for changes in this area. That includes being a voice in favor of responsible sourcing of materials, ensuring effective use of natural resources in the production of products, ensuring sound ethics and good governance in the behavior of all businesses in the supply chain.

Norwegian Transparency Act

On July 1 2022, the *Norwegian Transparency Act* entered into force. It established processes for the general public to gain access to information about how enterprises covered by the law address adverse impacts on human rights and working conditions.

Submit your questions by sending email to responsiblesourcing@atea.se

〉 Read more about Atea's responsible business efforts

〉 Learn more about the *Norwegian Transparency Act*

A supply chain full of challenges
Atea's suppliers include those who operate in internationally recognized high-risk areas around the world. We cooperate with suppliers and support improving the working conditions in these areas. This entails addressing common known issues within supply chains, including excessive working hours, violations of freely chosen employment, the existence of child labor, environmental pollution and business ethics. In doing so, we're committed to being at the forefront of ethical and sustainable production. Specifically, responsible sourcing of minerals is a key challenge for the electronics and other industries. Factors exacerbating the potential for human rights abuses include increasing global demand for minerals, poverty, uneven governance and sometimes outright conflict in the regions where these minerals are extracted.

Due diligence is an integral part of Atea's supply chain sustainability program. We recognize that addressing challenges in this area involves multiple layers of the supply chain. In line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, we have identified the IT brands—our suppliers—as the key point in our supply chain for focusing on traceability and due diligence. We assess our prioritized suppliers' work based on the five steps outlined in the guidance.

Atea's Assurance Program: the core of our management system
Through Atea's Assurance Program, we focus on continuous improvement, industry engagement, partnerships, and customer engagement. All these steps have the combined effect of influencing the whole IT ecosystem in which we operate.

Our approach is embedded in Atea's *Supplier Code of Conduct*. It states that our suppliers shall deliver goods manufactured in accordance with the RBA *Code of Conduct*–the industry standard supported by more than 200 active member companies and thousands more suppliers that are supporters of the initiative or are involved in supply chains connected to active members. In addition to being Regular Members of the RBA, we are also members of RBA-adjacent Responsible Minerals Initiative and Responsible Labor Initiative.

Working with our prioritized suppliers we assess: their commitment to uphold the RBA Code in their own operations and supply chain, the maturity of their management system, and the level of transparency reached in documenting their efforts. To ensure impartiality and verification of data gathered regarding supplier sustainability, we use several third-party solutions tested for suitability for our supply chain structure. Where specific risks are identified, suppliers are further engaged through dialogue and documentation gathering.

This may involve assessing relevant sub-suppliers' documentation and site visits and audits. A corrective action plan is formulated depending on the severity of issues found. If risk reduction measures were to be found inadequate—or if major breaches against social and ethical demands occur and are not addressed within agreed time limits—the business relationship could be terminated.

We also continuously monitor industry news sources, information provided by industry and NGOs and other applicable sources to identify possible allegations that could directly affect Atea's supply chain and suppliers. Such allegations are subject to an allegation management process. In that process, obtained information is checked for validity with industry schemes and suppliers directly and then acted upon according to *OECD Guidelines for Multinational Corporations*, including (but not limited to) obtaining relevant information from affected parties, using leverage to influence mitigation of adverse impacts, and terminating business relationships if no successful direct resolution or improvement timeline is reached.

As Atea works in accordance with ISO 37001 standards on anticorruption and the prevention of bribery, our suppliers are assessed on how well they meet these requirements.

Outcomes in 2022

During the review period, Atea:
- Attended both the RBA Annual Conference in Santa Clara, California, and the RBA European Conference in Brussels. These conferences brought together world leading companies, elected officials, NGOs and other industry representatives to discuss how we can collectively improve working and environmental conditions and business performance throughout the global supply chain.
- Continued to engage in industry and sustainability forums, including discussions related to implementing the newly enacted *Norwegian Transparency Act* and its implications for parties including the Norwegian Customer Authority and the RBA. Additionally, Atea's representatives were invited as speakers at events and multistakeholder dialogues related to supply chain sustainability and sustainability criteria.
- Communicated with strategic partners and prioritized suppliers' new criteria developed earlier in 2021 based on industry trends and input from Nordic customers. These criteria include requirements set out by the Norwegian Transparency Act to ensure Atea's ability to be comply with the new regulation.
- Provided information to inquiring parties on how our sustainability processes are aligned with OECD guidelines for Multinational Corporations, including details regarding supplier assessments, risk evaluations and mitigation of potential adverse impacts that are linked to our business activities.

- Screened distinct suppliers who provide products and services necessary for all business activities. As a result, none of the suppliers identified as high-risk were deemed to cause significant negative impact for supply chain integrity as they were among Atea's indirect spend suppliers.
- Began work on expanding the assurance program to include monitoring and evaluating downstream partners, such as electronics brokers, refurbishers and resellers. This was done to increase transparency across the value chain and to address the risk of contributing to e-waste: a significant issue identified within the electronics industry. This work will continue throughout 2023.
- Screened various allegations related to the IT supply chains. Out of these, three cases were discussed more in-depth with stakeholders to gain further insights on issues and to accurately mitigate possible negative impacts on stakeholders.
- Added capacity to our sustainability work via Atea's new Stakeholder Engagement Lead. This role steers how we work with our strategic partners in matters related to sustainability as well as develops and deepens Atea's cooperation with the RBA and other industry initiatives. It also helps us engage with our key customers on topics related to responsible choices within the IT supply chain.
- Performed annual assessments of the sustainability work of our strategic hardware partners and deepened our relationship with them in dialogue meetings covering topics such as heightened transparency and the impact of COVID policies on production within the electronics industry.

> To me, it is critical that various stakeholders within the IT supply chain cooperate and have an open and candid dialogue. That is the only way to go if we want to see sustainability measures that actually improve the lives of the rights-holders and protect the environment globally.
>
> *– Taru Suojaranta,*
> *Stakeholder Engagement Lead*

High-impact areas in the supply chain

Risk assessment

During 2019, audit and consultancy firm KMPG performed an overall supply chain risk assessment, which was updated in 2021. The assessment included both hardware and software and provides Atea with valuable insights on an aggregated level and a base for developing our processes.

It builds our understanding of the high-impact areas of the supply chain where efforts are needed to minimize negative impacts or increase positive impacts. A renewed risk assessment is done by a third party every three years.

Increase positive impact

General aspect

Governance:
- Transparency and traceability

Conflict minerals:
- Increase the supply of sustainable minerals

Working conditions:
- Freedom of association and collective bargaining

Working conditions:
- Freedom of association and collective bargaining

Product:
- Sustainable design

Resource attraction ≫ Smelters ≫ Simple components ≫ Complex components ≫ Assembly ≫ Brands ≫ ATEA

Conflict minerals:
- Conflict financing and impact on local communities

Environment:
- Reduced CO_2 emissions

Working conditions:
- Forced labor (highest risk)
- Fair working conditions for migrant workers and people with uncertain forms of employment (highest risk)

Working conditions:
- Forced labor
- Fair working conditions for migrant workers and people with uncertain forms of employment

Environment:
- Reduced CO_2 emissions
- Reduced water usage

Working conditions:
- Forced labor
- Fair working conditions for migrant workers and people with uncertain forms of employment
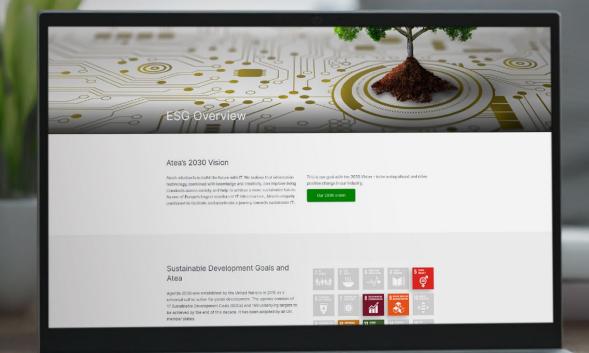
Product:
- Minimization of hazardous substances and chemicals in products

Minimize negative impact

"

Thank you for reading this report.

During the past year, we've focused on improving our reporting processes to ensure future compliance against new legislation such as CSRD. This work will continue in 2023 as well as our efforts improving the ESG Overview: the new platform where Atea's key KPIs, reports and policies related to the ESG area are easy accessible.

– Dace Bērziņa,
Head of ESG Reporting

Environmental Key Performance Indicators

Emission and energy data [1] on Atea Group level

Atea Group	2020	2021	2022
GhG Emissions (tCO$_2$e)			
Scope 1	3,434.4	3,400.7	3,830.4
Scope 2 - market-based	6,749.4	2,796.7	2,011.3
Scope 2 - location-based	2,265.2	2,016.0	2,403.1
Scope 3	804,568.4	957,773.3	884,375.1
Upstream activities	802,981.6	956,971.1	883,685.7
Downstream activities	1,586.6	802.2	689.4
Electricity consumption, MWh	29,502.4	26,808.0	30,007.9
Renewable electricity	48.1%	78.0%	86.9%
Renewable energy	34.6%	50.8%	57.9%
Water consumption, m^3	8,735.0	6,932.0	8,983.8
Emissions Intensity, Scope 1 and 2			
tCO$_2$e emissions per Gross sales in MNOK	0.218	0.128	0.120
tCO$_2$e emissions per full time employee	1.398	0.816	0.766
Emissions Intensity, Scope 1, 2 and 3			
tCO$_2$e emissions per Gross sales in MNOK	17.380	19.830	18.207
tCO$_2$e emissions per full time employee	111.510	126.700	116.440

[1] Data is subject to rounding during processing. Please note that numbers may consequently differ on decimal-level.

In 2022, we have broadened our Scope 3 reporting to include more categories. This approach provides us with a more complete view of the total environmental impact generated by our business. As part of our increased focus on data, we are reviewing our GHG emissions methodology and data systems to create better visibility into reduction opportunities as our business both grows and decarbonizes. Read more in Atea's Annual Carbon Footprint report.

Selected data from Atea's Goitloop services

	2020	2021	2022
Units recovered (incl. recycled)	446,020	436,399	604,110
Units reused/ repurposed			
Laptops	99,278	85,283	120,043
Computers	53,978	40,347	34,057
Mobile phones	7,691	10,629	15,151
Tablets	11,515	14,660	26,223
Monitors	29,087	16,250	18,687
Saved tCO$_2$e emissions	60,836	49,492	58,937

Employee Key Performance Indicators

Selected employee data by country

	Norway			Denmark			Finland			Lithuania			Latvia [1]			Estonia			Sweden [2]		
	2020	2021	2022	2020	2021	2022	2020	2021	2022	2020	2021	2022	2020	2021	2022	2020	2021	2022	2020	2021	2022
Employees at year end	1,640	1,748	1,812	1,406	1,447	1,544	413	424	512	605	610	638	547	611	642	64	63	65	2,803	2,861	3,045
Employees, male	81%	79%	79%	78%	78%	77%	78%	78%	78%	75%	74%	75%	59%	57%	50%	75%	67%	66%	76%	75%	74%
Employees, female	19%	21%	21%	22%	22%	23%	22%	22%	22%	25%	26%	25%	41%	43%	50%	25%	33%	34%	24%	25%	26%
New employees, male	74%	69%	72%	76%	77%	72%	74%	76%	83%	82%	77%	76%	61%	60%	48%	80%	79%	81%	79%	71%	74%
New employees, female	26%	31%	28%	24%	23%	28%	26%	24%	17%	18%	23%	24%	39%	40%	52%	20%	21%	19%	21%	29%	26%
Age Breakdown <30	224	291	338	162	176	223	26	21	53	183	168	173	258	249	217	14	11	12	482	428	403
Age Breakdown 30 - 50	896	930	930	768	767	759	256	261	307	333	357	369	276	348	411	48	48	50	1,568	1,596	1,641
Age Breakdown >50	520	527	544	476	504	562	131	142	152	89	85	96	13	14	14	2	4	3	753	837	1,001

Atea is strongly committed to respecting human rights, including labor rights. We strive to create a safe, decent, and humane work environment for all our employees. Atea strives to respect international standards and is committed to complying with relevant and applicable laws, industry standards, and relevant collective agreements on compensation and benefits, including working hours, breaks, and public holidays. Atea respects employees' freedom of association and their right to be represented by a trade union, including for the purpose of collective bargaining, and will not interfere with this right. Approximately 44% of employees are covered by collective bargaining agreements and/or universally binding collective agreements.

[1] Latvia includes (Atea Latvia, Atea Global Services and AppXite).
[2] Sweden includes (Atea Sweden and Atea Logistics).
[3] Data on gender distribution in leadership positions were not collected in 2020.

Employee data on group level

Atea Group

	2020	2021	2022
Employees at year end	7,478	7,764	8,258
Employees, male	76%	75%	74%
Employees, female	24%	25%	26%
New employees, male	76%	71%	72%
New employees, female	24%	29%	28%
Age Breakdown <30	1,349	1,344	1,419
Age Breakdown 30 - 50	4,145	4,307	4,467
Age Breakdown >50	1,984	2,113	2,372
Full-time employees	7,337	7,658	8,073
Employee turnover	17.6%	16.7%	16.5%
Lost time injuries	0	0	0
Fatalities	0	0	0
Absence rate	2.1%	2.4%	3.1%
Leadership, male	n/a [3]	71%	73%
Leadership, female	n/a [3]	29%	27%
Board, male	63%	63%	63%
Board, female	38%	38%	38%

Global Reporting Initiative (GRI) Index

Atea has reported in accordance with the GRI Standards (GRI 1: Foundation 2021) for the period January 1 to December 31, 2022. We have sought to report fully on all possible dimensions of the disclosures, but where this is not possible, we have reported as comprehensively as possible, based on the data systems we have. The table refers to where information about each disclosure is presented in our 2022 Sustainability Report, 2022 Annual Report, 2022 Remuneration Report or company website.

GRI Standard	Disclosure number	Disclosure name	Omissions	Page/ Location	Comments
General Disclosures					
The organization and its reporting practices					
GRI 2:	2-1	Organizational details		6	
General Disclosures 2021	2-2	Entities included in the organization's sustainability reporting		6	
	2-3	Reporting period, frequency and contact point		2	Andreas Antonsen, andreas.antonsen@atea.com
					Dace Bērziņa, dace.berzina@atea.com
	2-4	Restatements of information			No restatements of information.
	2-5	External assurance		44	This report has been assured by RSM (limited assurance).
Activities and workers					
GRI 2:	2-6	Activities, value chain and other business relationships		Annual report	
General Disclosures 2021	2-7	Employees	Information unavailable/ incomplete	13, 36	Partially reported requirements from 2-7 b). Part of the required information was not of adequate quality to report.
	2-8	Workers who are not employees	Information unavailable/ incomplete		Part of the required information was not of adequate quality to report.

Governance

GRI Standard	Disclosure number	Disclosure name	Omissions	Page/ Location	Comments
GRI 2:	2-9	Governance structure and composition		Corporate Governance	
General Disclosures 2021	2-10	Nomination and selection of the highest governance body		Corporate Governance	
	2-11	Chair of the highest governance body		atea.com	
	2-12	Role of the highest governance body in overseeing the management of impacts		17, 18	
	2-13	Delegation of responsibility for managing impacts		17	
	2-14	Role of the highest governance body in sustainability reporting		17	
	2-15	Conflicts of interest		Corporate Governance	
	2-16	Communication of critical concerns		17, 18	
	2-17	Collective knowledge of the highest governance body		17	Timely, relevant sustainable development related topics are brought to the Steering Groups attention throughout the year by Sustainability Committee.
	2-18	Evaluation of the performance of the highest governance body		Remuneration policy	
	2-19	Remuneration policies		Remuneration policy	
	2-20	Process to determine remuneration		Remuneration policy	
	2-21	Annual total compensation ratio		27:1	The organization's highest paid individual is the CEO. Total compensation ratio (CEO vs. employee average): 27.3 Ratio of change in total compensation (CEO vs. employee average): 5.2 The ratio of change in total CEO compensation is higher than regular employees because a significant share of executive remuneration is variable pay and all variable pay. The majority of regular employees have total compensation as fixed salary elements. Additional information on CEO remuneration can be found in the Remuneration Report 2022.

GRI Standard	Disclosure number	Disclosure name	Omissions	Page/ Location	Comments
Strategy, policies and practices					
GRI 2:	2-22	Statement on sustainable development strategy		16, 41	
General Disclosures 2021	2-23	Policy commitments		17, 31, Supplier Code of Conduct	
	2-24	Embedding policy commitments		17, 31, Supplier Code of Conduct	
	2-25	Processes to remediate negative impacts		31	
	2-26	Mechanisms for seeking advice and raising concerns		18, 19, Whistleblowing service	
	2-27	Compliance with laws and regulations		Annual report	
	2-28	Membership associations		6, atea.com	
Stakeholder engagement					
GRI 2:	2-29	Approach to stakeholder engagement		24, 29	
General Disclosures 2021	2-30	Collective bargaining agreements		36	
Material Topics					
GRI 3:	3-1	Process to determine material topics		24	
Material Topics 2021	3-2	List of material topics		24	
Business Ethics					
GRI 3:					
Material Topics 2021	3-3	Management of material topics		18, 19	
GRI 205:	205-1	Operations assessed for risks related to corruption		18, 19	
Anti-corruption 2016	205-2	Communication and training about anti-corruption policies and procedures		18, 19	
	205-3	Confirmed incidents of corruption and actions taken		18, 19	

GRI Standard	Disclosure number	Disclosure name	Omissions	Page/ Location	Comments
Climate change					
GRI 3:					
Material Topics 2021	3-3	Management of material topics		12, 20	
GRI 305:	305-1	Direct (Scope 1) GHG emissions		Carbon Footprint report 2022	
Emissions 2016	305-2	Energy indirect (Scope 2) GHG emissions		Carbon Footprint report 2022	
	305-3	Other indirect (Scope 3) GHG emissions		Carbon Footprint report 2022	
	305-4	GHG emissions intensity		Carbon Footprint report 2022	
	305-5	Reduction of GHG emissions		Carbon Footprint report 2022	
Circularity					
GRI 3:					
Material Topics 2021	3-3	Management of material topics		11	
GRI 306:	306-1	Waste generation and significant waste-related impacts		Carbon Footprint report 2022	
Waste 2020	306-2	Management of significant waste-related impacts		Carbon Footprint report 2022	
	306-3	Waste generated		Carbon Footprint report 2022	
	306-4	Waste diverted from disposal		Carbon Footprint report 2022	
	306-5	Waste directed to disposal		Carbon Footprint report 2022	
Handprint					
GRI 3:					
Material Topics 2021	3-3	Management of material topics		15, 24	
Responsible Sourcing					
GRI 3:					
Material Topics 2021	3-3	Management of material topics		30, 31	
GRI 308:	308-1	New suppliers that were screened using environmental criteria		32	
Supplier Environmental	308-2	"Negative environmental impacts in the supply chain and actions taken"		32	
GRI 414:					
Supplier Social	414-1	New suppliers that were screened using social criteria		32	
	414-2	Negative social impacts in the supply chain and actions taken		32	

GRI Standard	Disclosure number	Disclosure name	Omissions	Page/ Location	Comments
Customer privacy & data security					
GRI 3:					
Material Topics 2021	3-3	Management of material topics		[18](#), [19](#), [23](#)	
GRI 418:	418-1	Substantiated complaints concerning breaches of customer privacy			We registered no sanctioned complaints or incidents concerning
Customer Privacy 2016		and losses of customer data			breaches of customer privacy, data leaks, theft or loss of customer data in 2022.
Technology in society					
GRI 3:					
Material Topics 2021	3-3	Management of material topics		[27](#)	

Communication on Progress

This 2022 Sustainability Report, signed by our CEO — together with the information about sustainability found on Atea's webpages — serves as our Communication on Progress. Our self-assessment work to that end has been submitted on the UN Global Compact website.

Area	Principle	In this report	Atea Policies & Guidelines
Human Rights	1. Businesses should support and respect the protection of internationally proclaimed human rights.	Page 17-20	• *Code of Conduct*
	2. Businesses should make sure that they are not complicit in human rights abuses.	Page 31-33	• *Supplier Code of Conduct*
Labor Rights	3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Page 16, 21, 30-33	• *Code of Conduct*
	4. Businesses should uphold the elimination of all forms of forced and compulsory labor.	Page 30-33	• Supplier *Code of Conduct*
	5. Businesses should uphold the effective abolition of child labor.	Page 30-33	
	6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Page 16, 21, 30-33	
Environment	7. Businesses should support a precautionary approach to environmental challenges.	Page 10-24	• *Code of Conduct*
	8. Businesses should undertake initiatives to promote greater environmental responsibility.	Page 10-24	• Environmental policies
	9. Businesses should encourage the development and diffusion of environmentally friendly technologies.	Page 10-24	
Anti-corruption	10. Businesses should work against corruption in all forms, including extortion and bribery.	Page 17-19, 23	• *Code of Conduct* • Governance documents for the companies in the Atea Group (including Ethical Guidelines)

Atea supports the UN Global Compact and its 10 principles in the areas of human rights, labor rights, environment and anti-corruption. We operationalize the principles through guidelines, policies, reporting and internal/external trainings and seminars.

Key Figures Group (2018-2022)

Atea's objective is to provide a competitive long-term return for shareholders, relative to the underlying risk of the company's operations.
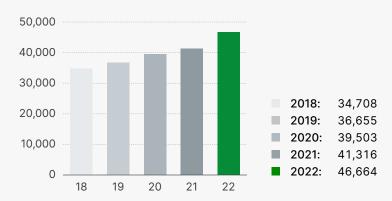
46.7	**8,073**	**-46%**
billion NOK in gross sales	employees (FTE)	emission reduction in Scope 1&2 (Since 2019)
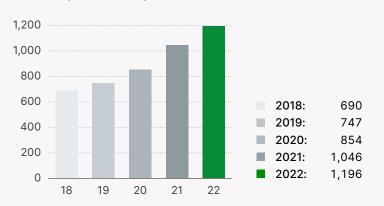
NOK in million (unless stated otherwise)	2018	2019	2020	2021	2022
Gross sales [1]	34,708	36,655	39,503	41,316	46,664
Revenue (IFRS) [1]	25,815	26,376	27,399	28,491	32,397
Gross profit	7,534	7,758	8,236	8,446	9,002
Operating profit (EBIT)	690	747	854	1,046	1,196
EBIT-margin (%)	2.7	2.8	3.1	3.7	3.7
Earnings per share (NOK)	4.33	4.84	5.37	6.84	7.62
Diluted earnings per share (NOK)	4.26	4.78	5.32	6.67	7.55
Cash flow from operations	946	1,897	1,388	1,096	1,030
Number of full-time employees at the year end	7,385	7,585	7,337	7,658	8,073

[1] Atea has implemented a change in accounting policy due to an Agenda Decision approved by the IFRS Interpretations Committee on April 20, 2022. Under the Agenda Decision, revenue from the resale of software and vendor services is recognized on a net basis - see Note 1 in Annual report for more information. Gross Sales is an Alternative Performance Measure which reflects gross invoiced revenue to customers, and is comparable to previous years' revenue reporting. Revenue (IFRS) is Gross Sales, following the change in accounting policy to apply net accounting treatment to the resale of software and vendor services.

Gross sales
2018–2022 (NOK in million)

2018:	34,708
2019:	36,655
2020:	39,503
2021:	41,316
2022:	46,664

Operating profit
2018–2022 (NOK in million)

2018:	690
2019:	747
2020:	854
2021:	1,046
2022:	1,196

RSM

RSM Norge AS

To the Board of Directors of Atea ASA

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Independent auditor's assurance report on Atea ASA's sustainability report for 2022

We have undertaken a limited assurance engagement of the Atea ASA's ("The Company") Corporate Responsibility & Sustainability Report for 2022 ("the Report"), published at https://www.atea.com/media/hyph5jl3/atea-sustainability-report-2022.pdf.

Responsibilities of the Director of Corporate Responsibility
The Director of Corporate Responsibility (management) in Atea ASA is responsible for the preparation and presentation of the Report prepared in accordance with the reporting criteria described in the Report, including GRI Standards, GRI 1: Foundation 2021. The management is also responsible for establishing such internal controls that they determine are necessary to ensure that the information is free from material misstatement, whether due to fraud or error.

Our Independence and Quality Control
We are independent of the Company as required by laws and regulations, and we have fulfilled our other ethical responsibilities in accordance with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants. We apply the International Standard on Quality Control (ISQC 1) and maintain a comprehensive system for quality control including documented policies and procedures that complies with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditor's Responsibilities
Our objective is to express a conclusion on the presentation of the Report based on the evidence we have obtained. We conducted our work in accordance with the International Standard on Assurance Engagements ISAE 3000 – "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information". This standard requires us to plan and perform our procedures to obtain limited assurance about whether, in all material respects, the Report is presented in accordance with the GRI Standards, GRI 1: Foundation 2021, and to issue a limited assurance report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

Considering the risk of material misstatement, our work included analytical procedures, inquiries and interviews with individuals responsible for the preparation of the Report, as well as a review on a sample basis of evidence supporting the information in the Report. Our work did not include pocedures to test management assertions about the effectiveness and completeness of the management's systems and processes.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

THE POWER OF BEING UNDERSTOOD
AUDIT | TAX | CONSULTING

RSM Norge AS is a member of the RSM network and trades as RSM. RSM is the trading name used by the members of the RSM network. Each member of the RSM network is an independent accounting and consulting firm which practices in its own right. The RSM network is not itself a separate legal entity in any jurisdiction.

RSM Norge AS er medlem av/is a member of Den norske Revisorforening.

Penneo Dokumentnøkkel: OTFU2-OV4E6-VL8AH-GSLTI-WM8EO-GXFBT

RSM

Limited assurance conclusion
Based on our work, nothing has come to our attention causing us not to believe that:
- Atea ASA has applied procedures to identify, collect, compile and validate information for 2022 to be included in the Report, as described in the Report.
- Information presented for 2022 is consistent with data accumulated as a result of these procedures and appropriately presented in the Report.
- Atea ASA has applied a reporting practice for its GRI report aligned with the Global Reporting Initiative (GRI) Standards' reporting principles.
- The Report fulfils the GRI Standards, GRI 1: Foundation 2021, or refers to information, on each of the reported disclosures of the GRI Standards.

Oslo, 28. March 2023
RSM Norge AS

Marius Gjengstø
State Authorised Public Accountant

Penneo Dokumentnøkkel: OTFU2-OV4E6-VL8AH-GSLTI-WM8EO-GXFBT

TP2B

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