

R E K  M
GROUP

COMMUNICATION ON PROGRESS 2022

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1.0

ABOUT THIS REPORT

With this report we want to share with our stakeholders, how we have made progress on our work with sustainability during the financial year 2021 and our expectations for 2022.

The report constitutes REKOM GROUP A/S' Communication on Progress (COP) report, which serves to account for the way we work to make the framework formed with UNGC's 10 principles operational in our business continuously improving our impact on sustainable development.



2.0

STATEMENT FROM CEO



Since opening our first venue in 2007, REKOM Group has grown into the biggest bar group in Northern Europe. Our vision is to keep accelerating this growth and over time become the world's largest bar group. This visionary plan requires a long-term planning perspective. To reach our goal, we constantly strive to fit into the realities of the future by not only seeking growth, but by working towards a sustainable growth for our business as well as society.

Ambition, integrity, and responsibility have been in the DNA of REKOM since we started, and those values are still the cornerstones of our business today.

2020 and 2021 were extraordinary challenging with the world embroiled in the Covid-19 crisis. Our world was particularly exposed. We live and breathe to bring people together. We were the first to be locked down and the last to be opened. We are grateful that our employees stayed loyal during these challenging times and that our investors continued to believe in our business model enabling us to continue our growth strategy. By end 2021 our group run more than xxx venues, all ready to celebrate the opening of the societies and bringing people together in Denmark, Finland, Norway and the United Kingdom.

Despite the challenging circumstances, REKOM is continuously committed to align our business model to the UN's global expectations to responsible business conduct, CSR. CSR is short for Corporate Social Responsibility and is defined as a company's responsibility to contribute to, while preventing adverse impacts on, internationally agreed principles for social, environmental, and economic sustainability.

The UN Global Compact outlines the global framework for CSR through the 10 principles concerning human rights (including the International Labour Organisations core labour rights), the environment including climate, and anticorruption. At REKOM, we structure our CSR efforts, covering the principles mentioned under the UN Global Compact, through the UN Guiding Principles for business and human rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD) defining the contemporary internationally agreed minimum standard for CSR. Our approach is systematic and principles based.

We want to contribute to a safe, exciting, and vibrant nightlife in the cities where we are present, and we want to use our strength and our leverage to contribute to sustainable development through collaboration with industry partners. As an example, we continued to be part of REGA (Restaurateur's Guarantee Association based in Copenhagen), an ambitious industry wide initiative leading the way for responsible business conduct now and in the future.

While our sustainability efforts have only been paused, our ambitions have not. We will continue our journey working within the framework of UNGC's 10 principles and our due diligence processes in the years to come and I am very excited to be a part of this journey with REKOM.

I am proud to reaffirm our support to the Ten principles of the United Nations Global Compact in the areas of Human Rights, including the core Labour Rights, Environment and Anti-Corruption.

Sincerely yours,

Adam Falbert
Chief Executive Officer and Founder



3.0

REKOM AT A GLANCE

REKOM Group A/S was founded in 2007. The idea behind REKOM was to create a common and strong foundation for opening more venues and developing new concepts. This idea quickly turned out to be sustainable and since then REKOM has grown rapidly and is today the largest nightlife group in Northern Europe.

We operate in the fragmented bar industry with many independent market players. As the biggest market player in Northern Europe more than 6500 employees (the majority are part-time employees), REKOM has a clear mission to be part of shaping the industry and contribute to raising standards for what it means to run a professional and sustainable company in the night life industry. We want to take an active role in relevant industry bodies and public networks and proactively engage in dialogue with authorities and political stakeholders on relevant business issues incl. sustainability issues.

During the past years we have worked to crystalize our corporate values and policies and as part of this process, we have adopted a holistic approach to sustainability, as we systematically seek to prevent or mitigate adverse impacts that our business may cause or contribute to on human rights, including core labour rights, the environment and anticorruption, while we also strive to contribute to sustainable development through strategic initiatives. This approach requires a constant effort to identify and manage risks in collaboration with our stakeholders and systematically advance our activities for the benefit of the business, our stakeholders and society.

We will continue this journey in the years to come, delivering on our vision.



VALUES

Because we have a lot of employees and because we constantly grow in numbers, it is important that we are consistent in the way we conduct our work and that we have a shared understanding of both how we treat each other and how we treat our guests, suppliers, other stakeholders and the environment. This requires us to work on the basis of the same values no matter which venue or country.

WE HAVE FIVE VALUES THAT UNITE US ACROSS THE ORGANIZATION

WE ARE QUALITY CONSCIOUS

WE ARE AMBITIOUS

WE CREATE HAPPINESS

WE ARE RESPONSIBLE

WE ARE RELIABLE

6



VISION

In REKOM we are ambitious. We always strive to improve and grow. Our vision is to be the innovative market leader of the nightlife in Northern Europe. As an organization, we follow strategic plans for growth and we continuously seize all opportunities that may arise for us to grow.



MISSION

REKOM as an organization is based on the passion of wanting to create unique experiences for people who go out. What drives us is the ambition to develop and operate bar and club concepts that make the nightlife more exciting. We wish to have happy, motivated, service-minded and skilled employees and managers who are able to give our guests the positive experiences that keep them coming back. We are profit-oriented and at the same time, we take pride in doing business in a proper and respectable way.

4.0

OUR COMMITMENT TO SUSTAINABILITY



REKOM establishes and runs multiple bars, bodegas and night-clubs in Northern Europe. We provide venues and opportunities for our guests to fully enjoy their time for rest, leisure and holidays. In addition, we form an integral part of cultural life where we operate. We will continue to develop innovative solutions for our guests to enjoy their right to leisure and take part in cultural life.

HOW WE DELIVER

As basis, we comply with national regulations, wherever we operate. With our considerable size in the industry we are also fully aware of our responsibilities to sustainable social, environmental and economic development. We continuously identify, prevent or mitigate our potential adverse impacts that we may cause or contribute to on internationally agreed principles for sustainable development; human rights, including core labor rights, the environment and the economy. When actual impacts occur, we will provide for access to remedy. We make our commitment to the principles referenced in UN Global Compact operational by applying the global standard from the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multi-national Enterprises (OECD); and we will account for our actions.

SOME KEY CONCERNS

Our industry faces some particular risks for adverse impacts, where we intend to demonstrate enhanced due diligence. Consuming alcohol in too large quantities may lead to adverse impacts on the right health; we promote responsible drinking. Discrimination, harassment and impacts on personal integrity may occur at our venues; we promote respectful interactions and safe environments. Creating such atmosphere and serving our guests, also during nighttime, requires us to constantly be on top of our employees' well-being.

We need to diligently manage the impacts, that our neighbors may experience in particular in regard to noise from our venues and guests. Also, we depend on good relations with the authorities, but we will never engage in corrupt practices to enable such good relationship.

WHAT WE EXPECT FROM OTHERS

We seek to prevent or mitigate adverse impacts that may be directly linked to our operations or services by raising the expectation to our business relationships, that they commit and act to avoid causing or contributing to adverse impacts on human rights, the environment and anti-corruption; and that they address actual adverse impacts, when they arise.

Should unattended severe adverse impacts occur in our value chain, we will use or build our leverage to make the business in question cease the impacts and implement the UNGPs/OECD.

EMBEDDING THE COMMITMENT IN ALL WE DO

Our commitment is publicly available and we will continuously communicate it internally and externally. Every three years we will revisit the commitment and continue to ensure that it is embedded in all other policies and processes.

5.0

DUE DILIGENCE

ASSESSING OUR
OWN IMPACTS

In 2021 we reviewed our work with assessing REKOMs risks by identifying potential adverse impacts on social, environmental, and economic sustainability for the Danish operations. As part of our work conducting impact assessments, we establish actions to improve how we prevent or mitigate our risks of adverse impacts.

The 2021 assessment is our first representative impact assessments for the danish part of our business. We expect to develop representative impact assessments for all countries we operate in, at present Denmark, Norway, Finland and the UK. REKOM operates more than 100 venues in Denmark alone. Our impact assessments are developed with a representative operational level location in mind and will be shared with all locations. Each venue will be expected to consider whether differences occur at their specific location or context and adapt actions to their findings. We evaluate that this is the more pragmatic solution for REKOM's CSR approach, as we cover many small locations throughout each country, that we are present in.

Our assessments were conducted with assistance of experts. We intend develop one set of representative impact assessments for every country, we are present in. In our current assessments covering our Danish activities, we have identified risks of impacts in relation to 22 of 48 human rights, 4 of 20 environmental areas, and 7 of 12 economic areas.

We consider risks of impacts on human rights across our operations that are both severe and non-severe. The UNGPs are clear on this point. The purpose of human rights due diligence is to identify and manage risks of impacts before they may escalate to severe human rights impacts.

We look for operational level risks that we may cause or contribute to. This means, we do not only consider actual impacts, i.e., issues that have gone wrong. We also, and mainly, consider risks that are prevalent to our business or operations. For most of our identified risks, we found, that we were managing them well already, thereby already acting to avoid that they turn into actual, or even severe,

impacts. Our impact assessments help us gain a stronger understanding of our risks, measure the effectiveness of our actions, and to continuously improve our management, where needed. In this way, we continuously act to prevent or mitigate impacts. In own assessments we merely include known severe impacts that we are linked to; we expect our business relationships to manage their own risks in alignment with the UNGPs/OECD.

In 2021 we started preparing our Code of Conduct for Employees (CoCE), which in more detail will inform our employees on their responsibility to assist us in meeting our responsibility. The CoCE will direct attention to the risks, that we have identified. It will also encourage employees to inform us, if they identify risks of impacts, we may have missed, and help us prevent impacts, where they may occur, and contribute to our sustainable journey by assisting with good ideas on where we can improve as a business.

ASSESSING OUR OWN IMPACTS

A.

HUMAN RIGHTS

INCLUDING CORE LABOUR RIGHTS

In our human rights impact assessment we have identified 22 rights where REKOM Group (Denmark) is at risk of causing or contributing to adverse impacts. We have actions in place to manage all risks.

SOME KEY CONCERNS RELATES TO THE FOLLOWING HUMAN RIGHTS



The right to safe and healthy working conditions



The right to health



The right to work



The right to non-discrimination



THE RIGHT TO SAFE AND HEALTHY WORKING CONDITIONS

Ensuring the safety and security of our employees is a key responsibility. We work in an industry where the working hours mainly are at night time and it can sometimes be hectic and tough work. Therefore, we have established a wide range of solid procedures, as well as continuous focus from management, employees and security personnel, to ensure that safety and good working conditions, are always our top priority.

As examples of our efforts it should be mentioned, that all of REKOM's venues have an emergency and evacuation plan in place, as well as fire extinguishing equipment. The evacuation plan forms part of our emergency procedure, that is well known to the staff. The fundamental elements of the procedure are visible at key locations at all our venues and are also covered by the Manager handbook. Staff are regularly trained in the evacuation plan in order to know and understand responsibilities in case of an emergency, and a step-by-step guidelines are placed at all positions in case of emergencies. Managers also follow an evacuation plan checklist as part of the preparation for every opening night.

Also, REKOM carried out an annual workplace assessment of all venues, annual employee appraisals and encouraged internal promotion and career development. Despite the lockdown, we have continued to roll out the REKOM Academy in 2021 to all employees across the Group, ensuring that all our employees have not only the needed skills, but also know about and comply with the relevant policies and values in their daily work.

To give our employees the best conditions for a safe and healthy working place, we have developed an employee satisfaction survey where a few questions are forwarded to the employees continuously over the year. This ensures that our employees have the possibility to give feedback and express their concerns and/or experiences relating to the right to safe and healthy working conditions, and it gives REKOM insight in what we need to improve in order to care for our employees.



THE RIGHT TO HEALTH

REKOM acknowledge that we may have adverse impacts on the right to health. It is essential for REKOM to ensure a safe and secure environment for our guests to go out and have fun. It is essential that our guests feel safe and secure coming to our bars and clubs, and our high level of diligence and safety is one of the reasons why they come back.

SAFETY AND SECURITY

REKOM has a strong partner in our professional security personnel, which we know are crucial to the safety at our bars, clubs and cocktail bars. Not only by checking ID and avoiding overcrowded venues, but also through diligence, proper training and strong service skills, they are part of ensuring the optimal experience for our guests. All our security providers are licensed and trained in multiple disciplines in addition to core security services, communication, first aid and handling situations where drugs and alcohol can be involved. Our security personnel also undergo further training in how to de-escalate conflicts and handle threatening individuals through dialogue. Our policy is that all guests must contribute positively to the venue atmosphere. Hence, threatening or rowdy guests are handled professionally and are ultimately asked to leave.

Together with regular feedback from our in-house security consultant, REKOM has a proactive and regular dialogue with the police on

specific security risks and trends in the street scene. Digital cameras are placed in strategic positions at all our bars and clubs for the safety of our guests and staff. Video can be used to clarify any unlawful conduct and is provided to the police on request.

RESPONSIBLE DRINKING

Important elements in preventing or mitigating adverse impacts on the right health of our customers is established through our 'responsible drinking' initiatives. We take a professional and respectful approach to guests, who should not be served anymore alcohol. Our standard procedure is to offer the guest water to freshen up. Our bartenders are trained to recognize signs of intoxication and to act on early warning signs. Staff will be ready to arrange for safe transportation home for intoxicated or otherwise vulnerable guests. Security personnel at the door also make sure that guests are able to navigate safely home when they leave.

REKOM has a zero tolerance policy for the sale of alcohol to young people below the legal drinking age. Security personnel verify guest IDs at the entry, and bartenders check IDs at the bar when necessary. While it is legal to offer special events for young people from the age of 16, we have made the choice not to engage in this segment. We only allow adults older than 18 years into our bars, clubs and cocktail bars.



THE RIGHT TO HEALTH

REKOM'S STAND ON RESPONSIBLE DRINKING

- Alcohol is served by professionals in a responsible way.
- No alcohol is served to young people below the legal drinking age.
- Guests who should not be served anymore alcohol are treated professionally and with respect.
- We create unique nightlife experiences - serving alcohol is just one component.
- We expect all employees to act as responsible ambassadors for the company when they are at work, at home or going out.
- We do not offer special events and private parties for young people under the age of 18.
- All marketing material is marked with responsible drinking statements and the legal drinking age.

DRUGS

REKOM does not tolerate any kind of drugs at our bars, clubs and cocktail bars. Using drugs is illegal and incompatible with the nightlife experience that REKOM stands for. Individuals suspected to be under the influence of drugs are denied access to our venues, and guests who are caught doing drugs are quarantined and/or reported to the police.

Security personnel and operational staff are regularly trained in spotting individuals under the influence of drugs. All staff are expected to be aware of warning signs and to report potential incidents to the security personnel. REKOM's drug policy and procedure are formalized in the employee handbook and covered regularly at staff meetings at each venue.



THE RIGHT TO WORK

REKOM acknowledge that we may have adverse impacts on the right to work, which among others includes the right to a contract and to vocational training. Most REKOM employees are younger people working part time and are often taking their first steps onto the career ladder. We commit to provide decent and flexible working conditions for our employees, just as good employment terms and benefits strengthen retention and general employee wellbeing.

We have implemented several procedures to ensure this. Our employee portal, with different levels of alarms, ensure, that no employees can start working until they have a signed contract. We appreciate that training and employee development are integral to ensuring high employee motivation and retention. To this end, we provide solid job introduction to new colleagues, on-the-job coaching and regular internal training courses, e.g. within service excellence, sales and various job-specific skills.

In 2017 we introduced REKOM Academy - a dedicated employee training platform, covering pre- and onboarding of new employees, e-learning courses and international classroom training. As a part of the onboarding process, all new employees are required to complete the courses at the Academy platform before having their first shift, just as all other employees

are expected to take part in ongoing training and skill development. The aim of the Academy is to provide efficient and high-quality training to our employees and in doing this, making sure all employees are and feels properly prepared for working in our company. We also believe that it will align skills and help build a consistent approach across the group. In 2018 we rolled out REKOM Academy in the whole group, including Finland and Norway.

In 2019 we were preparing to roll out of REKOM Campus - an ambitious educational platform for employees at REKOM Group wishing to enhance their career in a professional night life industry. Due to Covid-19 we were not able to roll out this new platform in 2020. However with society and our venues reopening in 2021, we activated the platform and thereby provide a full and ambitious educational framework for our employees.

During the Covid-19 pandemic, we were forced to close our business, leaving our employees without the usual social network they get through their work. In order to provide our employees with the opportunity to stay connected to their network and their workplace during the year 2021, REKOM continued to host various events for our employees from online inspirational talks to workshops and online concerts.



THE RIGHT TO NON-DISCRIMINATION

In terms of discrimination, we acknowledge that REKOM may have adverse impacts on the right to non-discrimination both in terms of our guests and employees. REKOM wants to ensure that the nightlife and our bars, clubs and cocktail bars are open to anyone, who wants to contribute in a positive way. We have adopted two charters serving as our policies preventing discrimination at our bars and clubs:

- Diversity Charter developed by the industry association for Denmark's Restaurants and Cafés (DRC) in alignment with the UNGPs.
- Charter for a fair nightlife without discrimination developed by the industry association HORESTA, DRC (Danish Restaurants and Cafés) and the City of Copenhagen.

By adopting these charters, we commit to ensuring equal treatment of guests and to implementing the necessary measures to prevent discriminatory behavior. The charters specify the human rights dilemmas in play and provide guidelines and actionable measures for tackling these.

As part of this, we clearly display our rules for entry, which apply to everyone irrespective of nationality, ethnicity, skin color, sexual orientation, ability or belief. Furthermore, we instruct staff and security personnel in the company's

diversity policy and regularly follow up on enforcement. Moreover, we engage in dialogue with individuals on the legitimate reasons for rejections, whenever necessary.

We have developed training in anti-discrimination for all employees, with guidelines and charters concerning anti-discrimination. We have also secured adequate training in conflict management for all employees.

Furthermore, we are part of the visible customer complaint system through the platform 'Lige i Byen' ("equality in night life") hosted by DRC and other partners in the night life industry.

DIVERSITY

Regarding discrimination in terms of gender composition, REKOM recognizes the importance of attracting, developing, and retaining the right talent. We only chose our members of staff based on professional qualifications. We are aware that diversity among employees is a strength and that gender composition and an equal gender balance not only enhances our international work environment and job satisfaction, but also helps us get more perspectives into our business processes and give our customers a much better experience in our bars.

To reach our goals and to prevent adverse impacts, REKOM makes sure that all gender specific language is eliminated from all job descriptions. Furthermore, we annually report on



THE RIGHT TO NON-DISCRIMI- NATION

representation in the board of directors and top management.

We also continuously seek to uphold the equal representation of men and woman in our bars and use statistics on representation of men and women amongst management staff in order to improve the representation in cases of underrepresentation, and to motivate and encourage underrepresented gender to seek career moves in the company.

BOARD OF DIRECTORS

Currently our board of directors consists of five men and one woman. While REKOM Group has not yet fully met the criteria for a gender balanced board of directors, we have continuous focus on enhancing a better gender balance.

MANAGEMENT

For other management levels REKOM seeks to ensure a better gender balance. In 2021 we had approx. 30% women in managing positions. REKOM is constantly working to improve our statistics in this matter by continuously focusing on establishing the right conditions of work and equal opportunities for all to be promoted.

In 2022, REKOM will continue focusing on attracting and hiring employees of all genders on an equal basis. REKOM aims to increase awareness about career opportunities for all

employees with a particular focus on underrepresented genders.

ACCESS TO REMEDY

No matter how diligent REKOM operates, adverse impacts will occur. REKOM will enable impacted persons to let us know if they experience adverse impacts for us to act appropriately and provide for access to remedy. REKOM has established a whistle-blower mechanism, as required by law. The anonymous whistle-blower-mechanism is available for everyone, both guests, employees, and the public in general, through our website. However, we acknowledge that a whistle-blower mechanism is primarily targeted at suspicions of violations of law and more severe incidences, where person(s) involved wish to remain anonymous.

The grievance mechanisms described by the UNGPs will have the purpose to engage potential impacted persons for a dialogue before the impacts emerge into transgressions of the law. REKOM already has an open-door policy and several avenues to engage and involve both internal and external stakeholders. In 2022 REKOM expects to analyze such existing channels of communication with potentially impacted stakeholders to decide how REKOM best possibly meet the eight effectiveness criteria for grievance mechanisms as outlined by the UNGPs.

ASSESSING OUR OWN IMPACTS

B.

ENVIRON- MENT

During our analysis we concluded that even these risks are limited; and water consumption primarily appears as known significant impact with our suppliers of beverages.

Similarly, waste management will require collaboration with our business relationships both to promote sustainable solutions for e.g. cleaning materials and packaging solutions and to ensure proper waste sorting and treatment.

Finally, noise are dealt with under the assessment of adverse impacts on the right to health, confer above.

As part of our planned engagement with our business relationships, we are planning to enter into dialogues on ESG/CSR with some business relationships from 2022 and onwards, including raising the key concerns regarding environmental risks in our value chains.

OUR ENVIRONMENTAL IMPACT ASSESSMENT IN 2021 DISCLOSED RISKS OF SIGNIFICANT IMPACTS IN RELATION TO:



Water consumption



Waste management



Noise emissions

ASSESSING OUR OWN IMPACTS

C. ANTI-CORRUPTION

Our economic impact assessment in 2021 disclosed risks of significant impacts in relation to:

- Inaccurate books and records
- Bribes in relation to private counterparts
- Illicit political contributions, charitable donations and sponsorships
- Offering or accepting gifts that influence decisions
- Cronyism and nepotism, hereunder clearly defined job duties

By conducting business in a responsible way, we limit risks of corruption and build trust with our stakeholders. Employees in the nightlife industry handle both large amount of cash payments and products. To minimize risks, REKOM has introduced a range of solid compliance and control measures to ensure that the handling of money is done in a responsible way. We have included the subject in our Code of Conduct for Employees underlining that REKOM has a zero-tolerance policy towards corruption, including any use of black money or moonlighting.

We have implemented digital payment solutions and cashiers at all positions at all our venues, which provide an oversight of all transactions, as well as reduces the volume of cash payments and thereby the risk of loss, moneylaundering and moonlighting. This initiative also allows financial tracking so managers can monitor deviations from performance indicators and take actions on early warnings. Venue surveillance and cash register checks have a preventative effect and provide oversight. In case of variations in performance indicators, we may use 'mystery shoppers' spot check compliance with our procedures. All major transactions require approvals by more persons. When re-assing our risks of impacts on economic sustainability in 2022, we will include additional risk areas such as anti-competition, tax evasion, extortion and fraud.

6.0

DUE DILIGENCE

RESPONSIBILITY IN BUSINESS RELATIONSHIPS

In REKOM's CSR policy, we will outline our expectations to any business relationship of ours, namely that they also align with the global minimum standard for responsible business conduct: The UNGPs/OECD. This means, REKOM will ask them to commit to responsible business conduct through a policy commitment, covering human rights, the environment and economic sustainability, fully aligned with the requirements to a policy commitment as outlined in the UNGPs Principle 16.

REKOM will also ask them to establish due diligence processes to identify and manage their own risks and, if requested, communicate how they manage these to their stakeholders – including to REKOM.

Lastly, aligned with the UNGPs, we require that they enable access to remedy through effective grievance mechanisms.

Like REKOM, we will expect our business relationships to require from their business relationships that they also

meet the internationally agreed minimum standard. REKOM will outline our expectations in a separate Code of Conduct for Business Relationships, which aims to assist our relationships in better understanding and meeting our expectations.

While our risk patterns may look different, we expect our business relationships to establish the same process of identifying, preventing or mitigating, and communicating their risks, as well as enabling remedy for impacted stakeholders. We offer to share our findings, both to enable transparency of risks in value chains, that we are linked to, and to inspire our business relationships with an example of assessments in alignment with the UNGPs/OECD. We ask them to be able to share the same level of information with us. In our eyes, this creates a level playing field for all businesses.

Where we know of severe or significant adverse impacts in our value chains, we ask the relevant relationship to manage the risk and communicate their result to us.

7.0

STRATEGIC CSR AND DOUBLE MATERIALITY

In addition to REKOM's principles-based approach to CSR, we have in 2021 conducted a more traditional materiality assessment as part of forming our ESG strategy, informing us of what topics, relevant to sustainability, that our stakeholders view as important to us.

We have compared these findings to the topics most relevant to our business and identified the main areas for our strategic CSR focus. We have thus identified 5 areas, where we may strategically contribute to sustainable development. These areas cover:

- Safety and Security,
- Responsible drinking,
- Our people and workplace,
- Responsible business, and
- Community relations.

This we consider a double-materiality approach. Where a principles-based due diligence process to identify all our risks, assists us in preventing or mitigating any material impacts that could emerge, our stakeholder-based materiality assessment may assist us in where to focus strategically on contributions to the communities, we are part of. We appreciate that the principles-based approach may also guide our strategic effort to be industry leading as a responsible business.

In 2022 we will continue to elaborate how REKOM best contributes to international principles for sustainable development in addition to our thorough and systematic efforts to manage our risks of adverse impacts.

8.0

MEASUREMENT OF OUTCOMES

Our impact assessments include specific qualitative and quantitative indicators to measure effectiveness of our actions to prevent or mitigate, as required by the UNGPs/OECD. We will follow up on the indicators by each re-assessment on consider to establish new indicators, as we improve the way we prevent or mitigate.

These indicators are different from our Key Performance Indicators (KPIs), which will assist REKOM tracking overall performance in aligning our business with sustainable development and providing our stakeholders with an overall impression of our sustainability implementation efforts, hereunder of the UNGPs/OECD.

REKOM KPIS FOR 2022 ARE:

- Approval by Board of Directors of our Policy Commitment
- Approval by executive management of Code of Conduct for Business Relationships
- Approval by executive management of Code of Conduct for Employees
- First impact assessments in alignment with the UNGPs/OECD conducted for Finnish operations
- First impact assessments in alignment with the UNGPs/OECD conducted for Norwegian operations
- First impact assessments in alignment with the UNGPs/OECD conducted for UK operations
- Annual re-assessments carried through for Danish operations
- Review of options to optimize existing grievance mechanisms or create other avenues in alignment with the UNGPs

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RAISE THE BAR