

Alektum Holding Sustainability Report 2025

# Enabling a more conscious economy

Today, and for generations to come

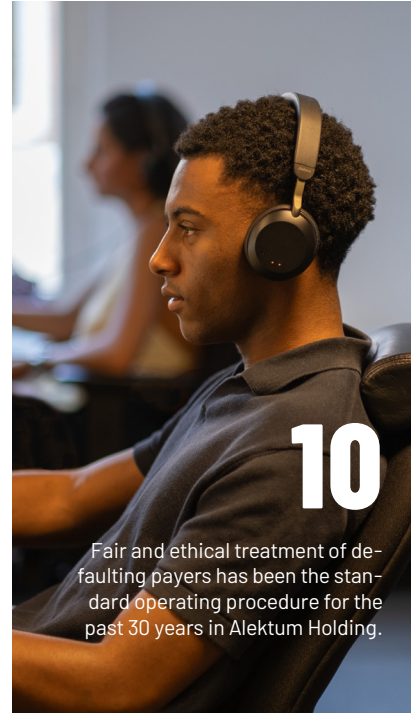


ALEKTUM  
GROUP



17

Our goal is to empower and enable people to make well-informed decisions and take control of their personal finances so that they can live the life they want, today and tomorrow.



10

Fair and ethical treatment of defaulting payers has been the standard operating procedure for the past 30 years in Alektum Holding.



20

We believe that diversity and inclusion are key factors to our ongoing success and are dedicated to providing everyone with an equal-opportunity workplace that promotes diversity, equality and inclusion.



23

We aim to instill a sense of environmental responsibility among all employees on a daily basis, both in large and small tasks. Everyone can contribute in one way or another.

# Content

## Alektum Holding AT A GLANCE

|                                |    |
|--------------------------------|----|
| A word from our CEO            | 4  |
| Organisation & strategy        | 5  |
| Materiality & stakeholders     | 6  |
| Policies and guiding documents | 7  |
| Focus areas                    | 8  |
| Targets                        | 9  |
| Culture & values               | 10 |

## FOCUS AREAS

|                                  |    |
|----------------------------------|----|
| Fair and ethical debt collection | 11 |
| Governance                       | 13 |
| Social responsibility            | 16 |
| Sustainable workplace            | 19 |
| Our environmental footprint      | 21 |

## ESG DATA SHEET

|                            |    |
|----------------------------|----|
| Key Performance Indicators | 23 |
|----------------------------|----|

## FOCUS 2025

|                              |    |
|------------------------------|----|
| Our commitment going forward | 24 |
|------------------------------|----|

An aerial photograph of a river winding through a dense forest. The trees are in various stages of autumn, with some showing bright yellow and orange leaves, while others remain green. The river is a deep blue color, reflecting the sky. The text is centered over the river.

**We believe in helping people  
live a life they can afford  
today *and* tomorrow**

*As a company supporting both people and businesses within the financial system, Alektum Holding has an important role in society. We can make a real difference.*

*By staying attuned to technological developments, changing consumption patterns and evolving payment behaviours, we are able to offer solutions that meet the needs of both our customers and individuals in a fair and responsible way. We strongly believe that knowledge, guidance and support are key enablers of financial balance, and that promoting financial literacy is an important part of counteracting over-indebtedness.*

*Social responsibility is also a powerful driver for engagement within Alektum Holding. By aligning our purpose with the positive societal impact we strive to create, we strengthen both our culture and our long-term value creation.*

*Together, we can provide long-term value and help both individuals and companies to a more sustainable and resilient economy.*

**Linus Singelman**

President and CEO of Alektum Holding



# Alektum Holding at a Glance

Alektum Holding is a Swedish financial services company founded in 1992, operating across several European markets with approximately 500 employees. The Group provides credit management and debt collection services, supporting businesses in securing payment for overdue receivables through fair and ethical practices, while guiding individuals towards sustainable personal finances.

## Our approach to sustainability

Sustainability is an integral part of Alektum Holding's culture, values and business operations, and is rooted in our vision "To help and inspire people to live a life they can afford." Our ambition is to contribute to a more conscious economy by promoting responsible credit management and helping to reduce over-indebtedness. By helping individuals become debt free through guidance, dialogue and respectful treatment, while at the same time enabling companies to get paid, we contribute to a sound and resilient economy for society at large.

Through our sustainability framework, we focus on areas where Alektum Holding can have the greatest impact and create long-term value. We believe that sustainable business practices strengthen trust, mitigate risks and support long-term value creation for our customers, employees and other stakeholders.

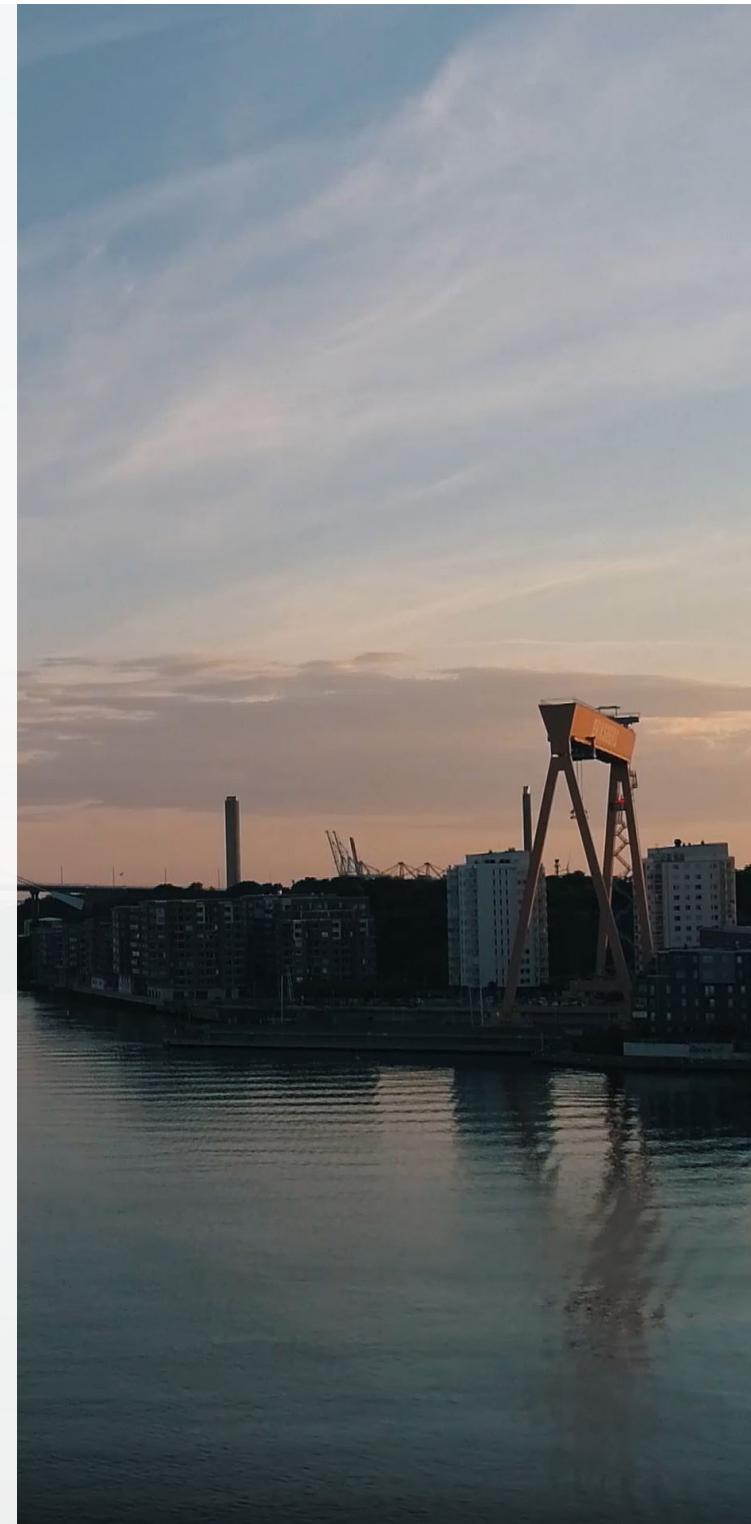
The sustainability agenda is characterised by the following principles:

- ✓ We conduct fair and ethical debt collection
- ✓ We see the individual behind every debt and treat each person with respect and understanding

- ✓ We are committed to helping and inspiring others towards balanced personal finances
- ✓ Our way of working promotes social and economic sustainability for our customers, debtors, and employees
- ✓ We regard human rights, integrity, privacy and respectful treatment as fundamental priorities

## About this report

This sustainability report has been prepared in accordance with the Swedish Annual Accounts Act, Chapter 6, Section 11. The content of this report is based on our primary sustainability focus areas. This report and the actions arising from it will be annually reviewed as part of the strategic planning processes which involve the management team and the board of directors, as well as our auditors.



# Materiality & Stakeholder Engagement

Alektum operates in a business environment shaped by climate change, evolving consumer and payment behaviours, macroeconomic conditions and demographic shifts. These developments affect both societal well-being and the way we conduct our business. To ensure that sustainability is integrated into our strategy, governance and operations, we work systematically with materiality, stakeholder engagement and robust governance structures.

The strategic direction of Alektum’s sustainability work is set by the Board of Directors and the Management Team, who hold overall responsibility for sustainability-related matters. Sustainability considerations are integrated into business planning, risk management and decision-making processes, ensuring alignment between our sustainability priorities and our business objectives.

Operational responsibility for sustainability is shared across the organisation, with relevant functions contributing within their respective areas of expertise. This structure ensures clear ownership, accountability and implementation throughout the Group.

## Double materiality assessment

Alektum Holding has conducted a Double Materiality Assessment (DMA) in line with the principles of the EU Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). The assessment provides the basis for the Group’s sustainability strategy and supports the prioritisation of sustainability topics addressed in this report.

The DMA evaluates sustainability matters from both an impact perspective, focusing on Alektum Holding’s actual and potential impacts on people and society, and a financial perspective, identifying sustainability-

related risks and opportunities that may affect the Group’s financial performance and long-term resilience.

The assessment was conducted with consideration to Alektum’s business model, services and value chain, with particular emphasis on customer interactions, ethical debt collection practices and responsible business conduct. The process included internal analyses, surveys and workshops involving relevant functions across the organisation.

Sustainability topics across environmental, social and governance areas were assessed and prioritised based on defined criteria, including the severity and likelihood of impacts and the potential magnitude and probability of financial effects. The results have been validated by Group management and form the foundation for the sustainability focus areas and disclosures presented in this report.

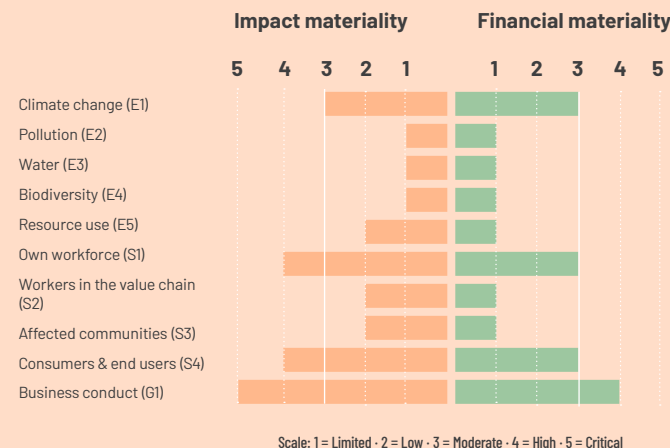
For the current reporting year, Alektum Holding presents aggregated results of the assessment, illustrating topics concluded to be material for the Group. More detailed reporting at sub-topic and IRO level will be introduced in future reporting, aligned with the disclosure requirements set out in the ESRS. The structure of this report reflects the outcomes of this year’s DMA.

## Key outcomes from the DMA

The double materiality assessment identified a limited number of material and double material topics, primarily concentrated in Alektum Holding’s own operations and downstream activities. These topics are mainly related to responsible business conduct, customer treatment, working conditions and data protection.

Environmental topics related to biodiversity, water and pollution were assessed as not material, reflecting the nature of the Group’s business model and value chain.

The figure illustrates the relative significance of each ESRS topic from an impact and financial perspective and forms the basis for the prioritisation of sustainability topics and the structure of this report topics and the structure of this report.



## Stakeholder engagement

Alektum Holding engages with a broad range of stakeholders, including customers, employees, owners, regulators, business partners and the communities in which we operate. Stakeholder dialogue is a key input to our materiality assessment and sustainability strategy, helping us understand expectations, identify risks and opportunities, and prioritise actions where we can have the greatest impact.

Through continuous engagement and collaboration, we aim to build trust, create shared value and ensure that our sustainability efforts remain relevant and effective across all our markets.

## Value chain overview

Alektum Holding operates primarily within the credit management and debt collection value chain, where the most significant sustainability impacts, risks and opportunities arise in direct interaction with customers and individuals.

Upstream, the value chain includes technology providers, data and information service providers, and other partners supporting Alektum Holding's digital infrastructure, data processing and operational efficiency. Responsible procurement, data security and compliance are key considerations in these relationships.

Alektum Holding's own operations form the core of the value chain and include credit management, debt collection processes, customer service, legal handling and data management. It is within these activities that the Group's greatest influence on social and economic sustainability occurs, particularly through fair and ethical debt collection, respectful customer interactions, regulatory compliance and the protection of personal data.

Downstream, Alektum Holding engages with business customers across multiple industries as well as individuals with overdue payments. By supporting

customers in securing payment while guiding individuals towards sustainable financial solutions, the Group contributes to reduced credit losses, improved cash flow and long-term financial stability, while also mitigating the risk of over-indebtedness and social exclusion.

## Policies and governing documents

Alektum has a comprehensive framework of policies and governing documents designed to promote ethical conduct, regulatory compliance and responsible business practices. These policies support effective corporate governance, mitigate risks and guide how we prevent, identify and address negative impacts related to our operations.

All employees are responsible for complying with the Group's policies, which apply to employees, associates and third parties acting on behalf of Alektum Holding.

The policies cover our operations, the products and services we procure, and the services we provide to customers and individuals, and include, among others:

- Code of Conduct
- Whistleblower policy
- Data protection
- Customer policy
- Workplace environment
- Information security

Sustainability considerations, including business ethics, data protection, regulatory compliance and fair and ethical debt collection, are embedded across these interdependent policies and procedures.

# 4 Key Areas for Lasting Impact

With close to 500 employees across Europe, Alektum Holding recognises that our operations have a significant and interconnected impact on individuals, businesses and society. We are committed to contributing to a more sustainable economy by minimising negative impacts and strengthening the positive impact we can make through responsible business practices.

Our sustainability strategy is embedded in our business strategy and guides how we operate, develop our services and interact with customers, individuals and employees. By integrating sustainability into everyday decision-making, we aim to create long-term value for our customers, our organisation and society at large.

Based on our double materiality assessment, Alektum Holding has identified four key areas where we have the greatest ability to influence outcomes and create lasting impact. These areas form the foundation of our sustainability work and guide our priorities, initiatives and targets.



## Fair and Ethical Debt Collection

Fair and ethical debt collection is central to Alektum Holding’s business and long-term success. We continuously invest in training and education to ensure that our employees act responsibly and in line with applicable regulations and ethical standards. By combining structured processes with a respectful and individualised approach, we aim to exceed customer expectations by the way we conduct business and through the respectful treatment of defaulting payers.



## Governance

Strong governance, compliance and data protection are essential in a highly regulated industry. Alektum Holding maintains a robust framework of policies, controls and audits to ensure regulatory compliance, data privacy and information security. Regular internal training and audits support awareness and accountability across the organisation, strengthening trust among customers, individuals and other stakeholders.



## Social Responsibility

Our goal is to empower and enable people to make informed decisions and take control of their personal finances. We aim to enable sustainable finances for our debtors and customers, and to increase financial literacy among children and adults through our various CSR initiatives, such as the Penny Pep.


By addressing issues such as over-consumption and financial vulnerability, we contribute to more sustainable personal finances and a more resilient society.



## Sustainable Workplace

A sustainable workplace is fundamental to employee engagement, well-being and long-term performance. Alektum Holding strives to provide a safe, inclusive and respectful working environment, free from discrimination and harassment. We aim to be a responsible and attractive employer, where all employees are treated with dignity and have equal opportunities to develop and contribute.

# Targets



## Fair and Ethical Debt Collection

- We aim to help our customers get paid by guiding their defaulting payers, while continuously adhering to social and economic sustainability in all decisions.
- Strengthen employee competence through continuous training in ethics, regulation and customer treatment.
- Further develop processes and tools that enable an individualised and respectful approach, tailored to each person's financial situation.
- Continuously maintain a high level of compliance with applicable legislation and industry standards.

- Maintain a strong governance framework that supports regulatory compliance, ethical conduct and data protection across the Group.
- Strengthen internal controls, policies and procedures related to privacy, information security and responsible business conduct.
- Ensure that sustainability considerations are integrated into risk management, business planning and decision-making processes.
- Increase organisational awareness and accountability through regular internal training and audits.



## Governance



## Social responsibility

- Contribute to reduced over-indebtedness by supporting individuals in achieving more sustainable personal finances.
- Increase financial literacy and informed decision-making through initiatives such as Pengapeppen.
- Develop services and communication that support transparency, understanding and constructive dialogue with individuals in financial difficulty.
- Strengthen Alektum Holding's positive societal impact by focusing efforts where the need and potential impact are greatest.

- Provide a safe, inclusive and respectful working environment that supports employee well-being, engagement and long-term development.
- Promote equal treatment and opportunities across the organisation, with zero tolerance for discrimination or harassment.
- Support talent attraction and retention through leadership development, competence building and a strong organisational culture.
- Foster a workplace where employees feel heard, respected and empowered to contribute to continuous improvement.



## Sustainable workplace

# Cultivating Company Culture and Values

Building a resilient company prepared for the future requires a strong company culture marked by active team engagement, forward-thinking leadership, and the incorporation of sustainability in both our processes and priorities. This year, we worked to strengthen our employee value proposition. To do this, and to stay true to our heritage, purpose and strategy, we act according to our key behaviours.

## Collaboration

Cross-functional collaboration is key to continuously develop individual-, team-, and organisational performance. We are open and honest towards each other with an ambition to understand others' point of view.

- ✔ Collaborate across teams
- ✔ Inspire those around you
- ✔ Help and care for each other
- ✔ Give positive feedback and celebrate success

## Personal Accountability

We are all accountable for what we can do to help out, support the team, add value for a colleague and/or a customer. By asking ourselves "what can I do" we make better choices and take action.

- ✔ Make responsible choices
- ✔ Take ownership for getting things done
- ✔ Embrace change and learn from mistakes
- ✔ Be part of the future-proofing and share your knowledge

## Customer Focus

We listen to understand customer needs, seek customers' point of view in everything we do and strive to create long-term added value for our customers' business.

- ✔ Team up for a greater customer experience
- ✔ Anticipate customers' needs and act proactively
- ✔ Listen and include different perspectives

## Simplicity

We make sure that activities are in line with top priorities and goals and communicate purpose and context in a clear and concise way. Removing complexity from our way of working helps us focus on implementation.

- ✔ Reduce inefficiencies
- ✔ Simplify wherever possible



## Why it matters

Rising household debt, economic uncertainty and changing consumer behaviour are increasing financial vulnerability across Europe. As a credit management company, Alektum Holding has a direct impact on how individuals experience financial difficulty. Fair and ethical debt collection is therefore essential to support financial stability, reduce over-indebtedness and strengthen trust in the financial system.

## Our ambition

Based on our double materiality assessment, Alektum Holding aims to set the standard for responsible and ethical debt collection. By combining technology, competence and compassion, we seek to deliver solutions that support both our customers and individuals, while ensuring compliance, transparency and long-term social and economic sustainability.

## Targets

- Ensure that fair and ethical debt collection principles are consistently applied across all markets and customer interactions.
- Strengthen employee competence through continuous training in ethics, regulation and customer treatment.
- Further develop data-driven and personalised solutions that enable sustainable payment plans and constructive dialogue.
- Maintain high customer and individual satisfaction through transparent communication and respectful treatment.

# Fair and Ethical Debt Collection Through Compassionate Problem-Solving

We live in a time of financial insecurities where unpaid debts are on the rise across Europe. The past year, several countries witnessed their most significant rise in household over-indebtedness since the 1990s. At the same time, the prevalence of “buy now, pay later” services has grown along with changing consumer behaviors, contributing to higher consumer debt levels. These developments, coupled with macro-economic uncertainties, have led to more individuals facing financial challenges, impacting businesses and society at large.

The European debt collection market has grown in recent years, driven by regulations and the macro economic development. The change in consumer behaviour has played a significant role in transforming the industry as debt collection agencies are increasingly adopting digital solutions to meet consumer expectations and to streamline operations and improve efficiency. Machine learning and AI is now being applied in various ways to better meet consumer behaviours, and to improve the effectiveness of collection efforts.

Fair and ethical treatment of defaulting payers has been the standard operating procedure for the past 30 years in Alektum Holding. To grow and maintain current business while constantly developing as a debt collection company we always apply the highest standards of ethics towards our customers. This is enabled through communication channels and payment options tailored specifically toward the debtor. Through AI and machine learning, we can determine the right action at the right time. Using this type of data-driven collection allows for a more successful outcome for all parties involved. It allows us to see the person and the circumstances behind each debt, and thereby find sustainable solutions even for those who are not immediately able to settle their outstanding debts.

By using advanced technology, our debt advisors can focus on more complex cases. We work continuously to further develop and refine our communication with debtors to ensure a personalised experience and handling concerning technical solutions, payment solutions, and communication channels. Being able to carefully evaluate the different aspects of the debtor’s situation is key to Alektum Holding’s collection process.

“Our mission is to help our customers get paid by guiding their defaulting payers, while continuously adhering to social and economic sustainability.”

As part of our work concerning responsible debt collection, we closely and carefully evaluate and select customers and debt portfolios, as outlined in our Customer Policy. We work diligently together with our customers to ensure a sustainable debt collection process that benefits both our customers and their debtors.

## Compliance & ethics

Alektum Holding operates in a highly regulated environment and maintains a robust compliance framework to ensure responsible and ethical debt collection across all markets. Complaints can be submitted directly to Alektum Holding, to supervisory authorities or to industry bodies, and are handled through a structured incident management process to ensure transparency, accountability and continuous improvement.

All required licences and certifications are in place, and regular training ensures that employees understand applicable regulations and ethical standards.

## Accessibility

Accessibility is central to our approach. We design communication channels, payment options and processes to be simple, inclusive and tailored to individual circumstances. By combining digital solutions with personal support, we aim to provide a respectful, transparent and constructive experience for individuals in financial difficulty.

Our guiding principle is to exceed customer expectations and improve the overall impression of Alektum Holding by the way we conduct business and through respectful treatment of defaulting payers. To monitor and improve our performance, we conduct regular debtor satisfaction surveys.

## Risk management

The risk of unfair or unethical treatment is managed through policies, controls and ongoing training. Our risk management processes focus on preventing harm, protecting privacy and ensuring that sustainable solutions are found for both customers and individuals. Reported incidents and complaints are systematically followed up and used to strengthen processes and reduce future risk.

A photograph of Peter Storåkers, COO of Alektum Group, standing in a restaurant or cafe. He is wearing a grey blazer over a light blue shirt and dark trousers. The background is softly blurred, showing other patrons and warm interior lighting.

*“We believe in an empathetic and responsible approach to debt collection, and have an unwavering commitment to ethical practices, and putting the needs of debtors at the forefront.”*

**Peter Storåkers**

COO, Alektum Group

# Governance

Governance is fundamental to Alektum Holding's long-term resilience. Operating in a highly regulated industry, we maintain a robust governance framework to ensure ethical business conduct, regulatory compliance, effective risk management and strong data protection across all markets.

**A**lektum Holding operates in a highly regulated environment and maintains a comprehensive compliance and risk management framework to ensure adherence to applicable legislation, ethical standards and industry requirements across all markets. As the Group continues its transformation and prepares for an expanded regulatory environment, strengthening governance and risk management remains a key priority.

The Board of Directors and the Management Team hold overall responsibility for governance and sustainability-related matters, supported by dedicated compliance, risk and information security functions. A structured onboarding and customer check process is applied to identify and mitigate regulatory, ethical and financial crime risks before entering into new customer relationships. Internal training, audits and follow-up activities ensure that employees understand their responsibilities and act in line with the Code of Conduct.

## Risk management

Alektum Holding applies a systematic and proactive approach to risk management to protect customers, employees and the business. All appointed risk owners conduct a comprehensive annual risk assessment, covering both internal and external risks, including operational, regulatory, financial, cyber and reputational risks.

Identified risks are analysed based on likelihood and potential impact, enabling prioritisation and appropriate mitigation. Preventive measures may include strengthened cyber

security, improved processes and targeted training. Where risks cannot be fully eliminated, contingency plans are established to reduce potential impact.

Risk management is supported by system tools and defined methodologies to ensure consistency, transparency and accuracy. Employees are encouraged to report risks and suggest improvements, reinforcing a culture of shared responsibility and continuous improvement.

Risks assessed above defined thresholds are escalated to Alektum Holding's Risk Committee, chaired by the CEO, and, where relevant, reported to the Board of Directors..

## Strengthening risk maturity and internal controls

The Group's Risk and Information Security Team is responsible for monitoring, evaluating and reporting operational risks, as well as proposing measures to strengthen the internal control environment. As part of our ongoing development, Alektum Holding is in the process of further formalising and strengthening its management systems, including preparations for ISO 27001 certification, to support consistent, structured and auditable risk management practices across the organisation.

These efforts support increased resilience, regulatory readiness and long-term sustainability as Alektum Group continues to evolve in an increasingly regulated business environment.

## Why it matters

Strong governance is essential in a highly regulated industry. Responsible business conduct, data protection and risk management are critical to maintaining trust, protecting individuals and customers, and ensuring long-term resilience.

## Our ambition

Based on the double materiality assessment, Alektum Holding aims to strengthen a governance framework that ensures ethical conduct, regulatory compliance, robust risk management and strong data protection across all markets. We are committed to ensuring robust risk management, protecting customer and company information, and aligning our governance framework with ISO 27001 principles for greater transparency and accountability.

## Targets

- Maintain a strong and effective governance framework supporting compliance, ethics and data protection
- Integrate sustainability considerations into risk management and business decision-making
- Strengthen internal controls, training and accountability
- Further develop information security and privacy protection

## Privacy protection

Respect for privacy and personal integrity is a fundamental human right and a core part of Alektum Group's responsible business conduct. Given the nature of our operations and the large volumes of personal data we handle, strong data protection practices are essential to maintaining trust, protecting individuals and ensuring compliant and ethical customer and debtor relationships.

Alektum Group processes personal data only where necessary and based on a lawful basis, in accordance with applicable data protection legislation and internal

“Strong governance is the cornerstone of a sustainable business, driving transparency and trust through compliance, data protection, and ethical practices.”

policies. We continuously review and adapt policies, procedures and controls to reflect changes in risk exposure, regulatory developments and business operations.

Designated compliance officers are responsible for monitoring and following up on data protection compliance across the Group. In parallel, our risk owner structure and continuous training efforts support a high level of awareness and shared responsibility for data privacy among employees. Through regular updates to internal routines, ways of working and training programs, we aim to continuously strengthen competence and maturity in data protection matters.

## Information security

With respect for human rights, integrity and the large volumes of sensitive data handled across our operations, information security and data management are among Alektum Group's most critical focus areas. During the year, we have strengthened our information security framework as part of our preparations for an expanded and more regulated operating environment, including the planned acquisition of Rediem Capital.

We continue to strengthen our proactive approach through clearly defined risk ownership and structured incident reporting. In the event of an incident or data breach involving personal or otherwise sensitive information, established routines ensure that incidents are promptly reported, documented, assessed and followed up. Every incident is assessed to identify root causes that can result in more incidents.

To keep pace with rapid developments in technology, legislation and the threat landscape, employees receive ongoing training and updates on relevant regulations, emerging risks and best practices. This work supports a high level of awareness across the organisation and ensures that information security remains an integrated and shared responsibility as Alektum Group continues its transformation.

## Code of conduct

Alektum Group's Code of Conduct forms a central part of our governance framework and applies to all employees, consultants and third parties acting on behalf of the Group. The Code sets out the values, principles and standards that guide our business conduct and support ethical, responsible and compliant operations across all markets.

Training in the Code of Conduct is provided as part of onboarding and through ongoing development. We expect our business partners and suppliers to adhere to the same, or equivalent, standards. No transactions or collaborations are entered into that do not meet the requirements and expectations outlined in our Code of Conduct.

## Zero tolerance against all forms of corruption and financial crime

Alektum Holding has zero tolerance for corruption, bribery and financial crime. Acting ethically and responsibly in all parts of our business is fundamental to maintaining trust, protecting stakeholders and ensuring long-term sustainability. We are committed to complying with all applicable laws, regulations, permits and authorisations in the markets where we operate.

Operating across several European markets and processing large volumes of transactions exposes Alektum Holding to risks related to financial crime and corruption. These risks are addressed through a structured governance and control framework, supported by dedicated functions, policies and processes.

Our Code of Conduct provides clear guidance for employees, consultants and third parties on expected behaviour and ethical standards. Compliance with the Code of Conduct is a prerequisite for all business relationships, and no transactions or collaborations are entered into that do not meet these requirements.

Customer due diligence plays a central role in preventing corruption and financial crime. In accordance with our Customer Policy, a structured Customer Check is mandatory before entering into new customer relationships and throughout the duration of the collaboration. This process supports risk-based decision-making and helps ensure appropriate quality, transparency and integrity in our customer portfolio.

Corruption risks are assessed within the Group's risk framework. Within the framework, we evaluate corruption risks throughout our organisation as well as activities in the following categories:

- Client and industry risks
- Geographical risks
- Internal risks
- Implementation risks

Identified risks are monitored, mitigated and escalated in line with defined risk thresholds and governance structures.

## Whistleblowing

Alektum Holding provides an anonymous whistleblowing channel through an external provider to ensure objectivity and confidentiality. Reports are handled by an independent whistleblowing function at a reputable law firm, supporting impartial assessment and follow-up. The whistleblowing channel is easily accessible throughout the Group and available in multiple languages to encourage reporting across all subsidiaries.

Suspected irregularities reported through the whistleblowing system are carefully investigated in accordance with internal routines and applicable regulatory requirements. Alektum Holding is strongly committed to compliance and ethical conduct, and all reports are handled with care and seriousness, with appropriate actions taken where needed to prevent violations of laws, regulations or internal policies.

While it is not possible to fully protect the organisation from all types of incidents or misconduct, we strive to create an environment where employees and other stakeholders feel safe to speak up. We therefore encourage employees, partners and other parties to report suspected violations of regulations, internal instructions or ethical guidelines through the whistleblowing system or other appropriate channels.

## Respecting human rights

Respect for human rights is a fundamental part of Alektum Holding's governance framework and responsible business conduct. Our commitment covers, among other things, the protection of privacy and personal integrity, as well as principles of equality, dignity and non-discrimination.

Although the overall risk of human rights violations within our operations is assessed as relatively limited, we recognise our responsibility to remain vigilant. We continuously work to identify, assess and manage potential human rights impacts and risks across our operations and value chain.

Employees, suppliers and other stakeholders who become aware of potential human rights concerns related to Alektum Holding's operations are encouraged to report these through management, human resources, legal functions or the independent whistleblowing channel, in line with established procedures.



# Social Responsibility

By taking human rights, working conditions, equality, and diversity into account, we aim to create a social impact where it makes the biggest difference. But social responsibility is also about supporting the communities and markets we operate in. For us, community engagement is about creating positive changes through various initiatives, as well as local and group-wide activities aimed at raising awareness of financial literacy and sustainable finances.

Our goal is to empower and enable people to make well-informed decisions and take control of their personal finances. We see a trend where the “buy now, pay later” option in many cases has become the norm, rather than the exception. This creates a reality where it is imperative to have a good understanding of basic economic concepts in order to make sound financial decisions, something that many people lack. As a debt collection company, we see the consequences of low financial literacy. There is a clear correlation between insufficient financial skills and poor financial decisions, which can often result in over-indebtedness—especially among young adults.

A basic understanding of personal finances (financial literacy) is thus crucial to prevent over-indebtedness in society. Through initiatives such as the Penny Pep, we aim to increase people’s knowledge of personal finances and instill confidence and healthy financial habits to counteract the increasing trend of excessive personal debt.

## Enabling a more conscious economy

The basic abilities that adults use to control their financial decisions are developed and influenced from early pre-school age. These continue to develop throughout childhood and adolescence. A central part of this development is that the children take in norms and values related to financial/economic decisions. Simply put, children learn from others how to do it. We know that parents and guard-

ians are the most central source of children’s financial socialisation and children are amazingly good at taking in and imitating what their parents do. However, if parents don’t have sufficient knowledge to create healthy habits and values surrounding money, there is a great risk that our future generations will experience even greater financial difficulties than what we see today.

Through our CSR initiatives, we raise awareness, break barriers and help people to a better life by enabling financial sustainability. We aim to create awareness and help people achieve financial health. The Penny Pep initiative is one part of this. We actively connect with people through channels such as our website, our podcast, lectures, and various social media platforms like Instagram, where we have close to 60 000 followers. We consistently share tips, advice, and anecdotes to our engaged audience. Our ambition is to build knowledge and financial literacy while inspiring as many people as possible to find their financial balance and their financial confidence.

26% of Swedish parents are now well-acquainted with the Penny Pep (Pengapeppen). This signifies a crucial step forward as it opens doors for the next generation to learn responsible financial habits, empowering them with the essential skills to navigate their personal finances effectively in the future.

## Why it matters

When financial stress increases, it affects not only individuals, but families and entire communities. As a credit management company, Alektum Holding meets people at some of the most vulnerable moments in their financial lives, and we see every day how limited financial knowledge and unsustainable consumption can lead to over-indebtedness, especially among young adults.

## Our ambition

We aim to make a positive difference by helping people build confidence, understanding and healthier habits around money. We believe that everyone deserves the opportunity to live a life they can afford, and that financial literacy is a key enabler of long-term social and economic sustainability.

Our social responsibility work supports both society and our business. By strengthening financial literacy and a healthy payment culture, we help reduce social risk, build trust and support our customers’ long-term success.

## Targets

- Help more people build confidence and understanding around personal finance
- Contribute to reduced over-indebtedness
- Focus our social initiatives where the need and potential impact are greatest
- Strengthen Alektum Holding’s positive impact on society by integrating social responsibility into our business strategy

As a debt collection company, Alektum Holding is aware of the risk of being perceived as contributing to over-indebtedness rather than supporting a healthy payment culture. We manage this risk by combining fair and ethical debt collection practices with financial education initiatives, continuous training of our debt advisors and careful selection of customers and debt portfolios, ensuring that our social responsibility work strengthens trust and creates positive impact.

## Inspiring people to find their financial confidence

We believe it's important to start talking about personal finances early. This year, in addition to our digital channels, we spoke in front of hundreds of high schoolers, in different parts of the country, to prepare them for adulthood.

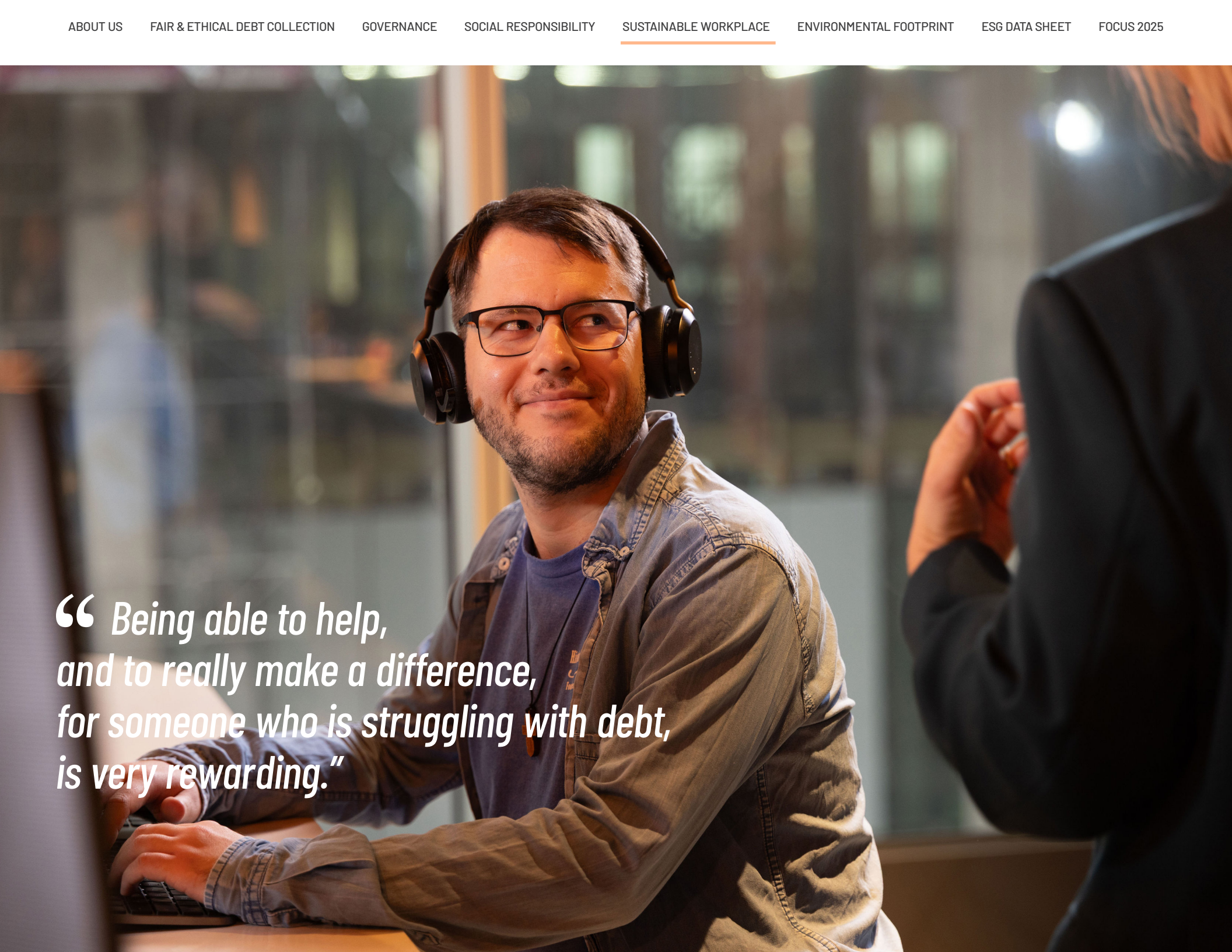
Our focus is not only on increasing financial knowledge, but on helping people turn that knowledge into healthy habits and confident decisions.

Because having the knowledge is only one part - being able to use that knowledge through sound habits and values is another.

That's what builds financial confidence.

A man in a dark blue button-down shirt and a young girl in a light purple t-shirt with a large pink bow in her hair are standing against a light blue background. Both have their arms raised in a gesture of confidence or triumph. The man's eyes are closed, and the girl is smiling broadly. A white speech bubble is positioned above the girl, containing the text 'Financial confidence is a superpower'.

**Financial confidence is a superpower**



*“ Being able to help,  
and to really make a difference,  
for someone who is struggling with debt,  
is very rewarding.”*

# Sustainable Workplace

At Alektum Holding, you stay for a long time. That has been true for more than 30 years, and it remains an ambition we hold firmly, even in a year marked by significant change. As Alektum Holding continues its transformation, we remain convinced that our employees are our most important asset and a key driver of long-term success.

**W**hile the year has brought challenges, it has also reinforced our commitment to strengthening our Employee Value Proposition (EVP). Our goal is to create a workplace where employees feel valued, supported, and able to grow alongside the company. We strive to be an employer of choice by offering meaningful development opportunities, clear leadership, and a positive, respectful work environment.

Guided by our values and respect for human rights, we maintain zero tolerance for discrimination, harassment, or abusive behaviour. Our Code of Conduct and Workplace Environment Policy set clear expectations for ethical behaviour, inclusion, and mutual respect. Diversity, equality, and inclusion are fundamental to our culture and to building resilient, high-performing teams.

## Talent management

Our employees' competence, engagement, and well-being are essential to Alektum Holding's sustainability and future success. During the year, we have focused on aligning recruitment, development, and retention with our long-term strategic direction.

We promote equal access to learning and skills development and encourage all employees to contribute through our Key Behaviours: supporting collaboration, improving performance, and reflecting on how we create value for customers and society. Our e-learning platform supports continuous professional development and helps ensure

our teams are equipped to deliver both high-quality, compliant service and compassionate solutions.

Managers play a central role in navigating change and supporting their teams. Through ongoing leadership development, we strengthen managers' ability to lead with clarity, empathy, and accountability. Our performance management framework links company goals with individual and team objectives, supporting transparency and shared responsibility.

## Health and wellbeing

Employee well-being is a cornerstone of a sustainable workplace. Managers are key to identifying risks early and fostering a supportive work environment. We encourage a healthy work-life balance and promote both physical and mental well-being, including through wellness benefits and preventive initiatives. By supporting our employees' health, we aim to maintain an engaged, resilient, and motivated workforce.

## Risks and mitigation

People-related risks include challenges related to engagement, stress, diversity, equal treatment, and the ability to attract and retain key talent. If not addressed, these risks may affect employee satisfaction, customer experience, performance, and trust in the Alektum brand.

These risks are mitigated through clear HR policies, collective agreements, leadership development, continuous

## Why it matters

Our employees are the foundation of Alektum Holding's success. Their well-being, engagement and skills enable us to deliver value to customers, build trust in society and run a responsible, resilient business. A supportive, inclusive and safe workplace is essential to attracting and retaining talent, fostering innovation and achieving our long-term strategy.

## Our ambition

We aim to be an employer of choice where people feel valued, supported and empowered to grow. By building a culture based on respect, inclusion and accountability, we create the conditions for both individual development and strong business performance. Every employee should feel connected to our mission and confident that their contribution makes a difference.

## Targets

### Strengthen our EVP

During a year of significant change, we have placed strong emphasis on listening to our employees. We measure the "employee temperature" weekly to enable ongoing dialogue and feedback throughout the organisation.

The Employee Satisfaction Index complements this by providing insights into engagement, well-being, leadership and alignment with our mission, supporting targeted actions to strengthen our culture and employer brand during our transformation.

### Continuous training for staff

Our new learning platform will facilitate skills development, our onboarding process and increase internal knowledge of Alektum Holding's strategy and how all employees are connected to its success

### Regular performance reviews

With the goal of following up on individual performance and objectives, key behaviors and development needs connected to their role.

employee dialogue, and regular follow-up through tools such as Winningtemp. Ongoing training and a strong ethical framework further support a fair and inclusive workplace.

## Targets

To support continuous improvement and employee involvement, we measure the “employee temperature” weekly. This is complemented by the Employee Satisfaction Index, which tracks engagement, loyalty, leadership, stress, and alignment with our mission. Insights guide targeted initiatives to strengthen leadership, well-being, and our employer brand.

Our ambitions include:

- ✔ Zero tolerance of workplace harassment and discrimination. Everyone is treated with dignity and respect.
- ✔ Sustained employee satisfaction in line with the Winningtemp index.
- ✔ Reduced work-related stress and improved well-being.
- ✔ Progress toward diversity at all levels.
- ✔ Equal opportunities and treatment for all

Together, these efforts support our ambition to remain a workplace where people want to stay, grow, and contribute, even in times of change



# Minimising our Environmental Impact

While Alektum Holding's direct environmental impact is relatively limited due to the nature of our business, we remain committed to continuously reducing it within the areas where we have the greatest influence. Our key focus areas include resource usage, energy consumption, business travel and the responsible lifecycle management of IT equipment. Through practical measures and everyday choices, we aim to foster a culture of environmental responsibility across the organisation.

A balance of what is technically possible, economically reasonable, and ecologically justified must be made in each instance where an environmental impact may exist. All employees are informed about our environmental policy, and managers are responsible for ensuring that relevant goals, routines and guidelines are understood and reflected in day-to-day work. By continuously improving our processes and systems, we seek to reduce environmental impact while maintaining efficient and high-quality operations.

Environmental responsibility is also integrated into our supplier relationships. Suppliers are expected to comply with Alektum Holding's Code of Conduct, ensuring alignment with our standards. We encourage all employees to contribute through conscious everyday actions, such as minimising unnecessary printing, using digital meetings where possible, supporting waste sorting, and reducing energy use in offices.

## A more digital way of working

Digitalisation plays a central role in reducing our environmental footprint. By transitioning products, services and internal processes to digital solutions, we reduce paper usage and streamline communication with employees, customers, debtors and suppliers. The share of digital communication, particularly with debtors, has increased significantly in recent years and continues to grow, contributing to a reduced volume of physical mailings.

## Energy usage

We strive to use energy-efficient and sustainable solutions across our operations. The availability of renewable energy varies between markets, but where possible, we prioritise clean energy sources in our offices. Our largest energy consumption relates to data and server centres, which we continuously assess from an efficiency and security perspective.

Alektum Holding's headquarters is certified according to BREEAM In-Use, demonstrating that the property meets high sustainability standards in areas such as energy consumption and waste management.

## Changing the way we travel

As a pan-European organisation, business travel has historically been a source of greenhouse gas emissions. Advances in digital collaboration tools have enabled a shift towards more sustainable travel practices. We encourage the use of video conferencing for meetings and promote travel only when necessary to deliver value to customers and stakeholders.

Where travel is required, environmentally preferable options are promoted, including train travel for domestic journeys. Company and benefit cars are provided only where there is a business need, with a clear focus on low-emission alternatives. Our ambition is to transition to

## Why it matters

Environmental sustainability is an important part of responsible business conduct and long-term value creation. While Alektum Holding's direct environmental footprint is limited due to the nature of our business, we recognise our responsibility to minimise environmental impact where we can. By using resources efficiently, reducing emissions from travel and offices, and making conscious choices in our operations, we contribute to risk reduction, cost efficiency, and alignment with stakeholder expectations.

## Our ambition

Alektum Holding is committed to continuously reducing its environmental impact within the areas where we have the greatest influence. Our ambition is to lead by example in our day-to-day operations by promoting responsible resource use, increasing energy efficiency, and reducing emissions linked to travel and office activities. We focus on practical, measurable improvements that support both environmental responsibility and operational efficiency.

## Targets

### Reduce resource usage

- Transition 90% of debtor communication to digital channels by 2026.
- Maintain recycling systems and circular solutions for IT equipment.

### Lower Emissions

- Transition to a fully non-fossil-fuel car fleet by 2028.
- Reduce emissions from business travel by 25% by 2026, using 2019 as a baseline.

### Increase Energy Efficiency

- Ensure 100% of new office locations use renewable energy where available.

a fully non-fossil-fuel company car fleet by the end of 2028.

## Resource usage and circularity

We apply circular principles in our resource management wherever possible. This includes:

- ✔ Office locations in environmentally considerate buildings where available
- ✔ Recycling and waste sorting systems across all offices
- ✔ Printing solutions that encourage conscious printing decisions
- ✔ Responsible reuse or recycling of electronic equipment, with secure data erasure at end of life

## Risk analysis

Businesses play an important role in reducing environmental and climate impact, and we view this as a shared responsibility. A key risk is the limited ability to implement environmental measures consistently across all markets due to differences in infrastructure and availability of sustainable solutions. This risk is mitigated through internal governing documents, including our environmental policy, travel policy, procurement policy, company car policy and Code of Conduct.



2023

2024

2025

E

| Environmental Aspects                             |                                   |                   |                   |
|---|-----------------------------------|-------------------|-------------------|
| The digital share of mailings sent to our debtors | 66% (Sweden)<br>64% (Group total) | 82% (Group total) | 85% (Group total) |
| Percentage of digital invoices sent to clients    | 90%                               | 89%               | 95%               |

S

| Social Responsibility   |                                   |                                   |                                   |
|---|-----------------------------------|-----------------------------------|-----------------------------------|
| Brand awareness CSR initiatives (Measured annually)   | Penny Pep 26%                     | Penny Pep 26%                     | Penny Pep 26%                     |
| Sick leave Operations total. The total for the Group was measured starting 2023   | 6.4%                              | 5.7%                              | 5.7%                              |
| Employee turnover rate Measured as the number of employees started minus number of employees leaving in relation to average number of employees during a specific period. | Growth 12.3%                      | -12.8%                            | -22,3%                            |
| Winningtemp participation rate  | 79%                               | 78%                               | 74%                               |
| Employee satisfaction Measured as a temperature through Winningtemp, where the goal is to equal or exceed their index at 74.  | 7.8 (Index 7.6)                   | 7.2 (Index 7.3)                   | 6.6 (Index 7.5)                   |
| Employees' perceived work situation Measured as a temperature through Winningtemp, where the goal is to equal or exceed their index at 6,9                                | 7.6 (Index 7.1)                   | 7.3 (Index 7.1)                   | 7.1 (Index 7.4)                   |
| Gender diversity  | Board: 17% women<br>MT: 33% women | Board: 17% women<br>MT: 30% women | Board: 17% women<br>MT: 30% women |

G

| Corporate Governance   |  |   |   |
|--|--|---|---|
| The number of reported incidents within the framework of our whistleblowing system | 0  | 1 | 0 |
| Number of incidents involving loss of customer data                                | 1  | 1 | 0 |
| Frequency and number of completed GDPR employee training sessions                  | Five sessions per year as well as ongoing sessions for new employees |   |   |

# Setting the path for sustainable impact

We are committed to integrating sustainability into our overall strategy and aligning our ambitions, priorities and ways of working with applicable laws, regulations and evolving regulatory frameworks. As Alektum Holding continues to transform, sustainability remains a key enabler of long-term value creation, sound governance and responsible business conduct across all our markets.

The coming years will be shaped by both regulatory developments and strategic transformation. In parallel with strengthening our sustainability framework, Alektum Holding is preparing for an expanded regulatory environment as we complete the acquisition of a company holding a banking licence. This transformation, including our ambition to achieve status as a specialised debt restructurer (SDR) in 2026, will introduce additional regulatory expectations and reporting requirements, which we are actively preparing to align with.

## Key focus areas for 2026

- ✔ **Regulatory preparedness and materiality**  
Continue developing our sustainability framework and materiality assessments to ensure alignment with applicable sustainability-related regulations, supervisory expectations and reporting standards
- ✔ **Governance, policies and internal controls**  
Review and strengthen governance structures, policies and guidelines to support responsible business practices, regulatory compliance and transparency
- ✔ **Embedding sustainability across operations**  
Further integrate sustainability considerations into processes, decision-making and ways of working across all markets and business areas.
- ✔ **Data security and risk management**  
Continue strengthening data protection, information security and risk management capabilities to

safeguard sensitive information and support a more regulated operating environment.

- ✔ **Social impact and financial resilience**  
Further develop our social responsibility initiatives, including efforts to promote financial literacy and support individuals in achieving sustainable personal finances.
- ✔ **Reporting quality and traceability**  
Improve systems, processes and controls for sustainability-related data to ensure traceability, reliability and readiness for evolving reporting expectations.

By taking a structured and adaptable approach to sustainability, we aim to support Alektum Holding's transformation, strengthen trust with stakeholders and build a resilient foundation for long-term value creation in an increasingly regulated and complex business environment.

