



Enabling a More Conscious Economy

Today, and for generations to come

Alektum Holding Sustainability Report 2024



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	6
Focus areas	7
Targets	8
Culture & values	9

FOCUS AREAS

Fair and ethical debt collection	10
Governance	13
Social responsibility	17
Sustainable workplace	20
Our environmental footprint	23

ESG DATA SHEET

Key Performance Indicators	26
----------------------------	----

FOCUS 2024

Our commitment going forward	27
------------------------------	----



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

“

As a collection company, we have an important role to fill in society. We can make a difference. Staying on top of technological advances and changes in consumption patterns and payment behaviours allow us to offer the right solutions to both customers and debtors. We strongly believe in informing and educating people on how to achieve financial balance and to raise financial literacy as a way to counteract over-indebtedness. We also know that social responsibility, or CSR, is a strong and important driver for our employees, aligning our purpose with the broader societal impact we aim to create.

Thus, together, we can provide long-term value and help both individuals and companies to a more sustainable economy.

Linus Singelman

President and CEO of Alektum Holding



Alektum Holding at a Glance

Alektum Holding is a Swedish debt collection company founded in 1992. For the past 30 years, our mission has been to help businesses across Europe to achieve long-term growth and a more predictable cash flow, through high-quality solutions and fair and ethical debt collection practices. With an ambition to build trust through transparency and with sustainability as an integral part of all our interactions, we generate financial value for our customers. We do that by helping them get paid for their past due claims, thereby minimising credit loss and enabling further economic growth. At the same time, we are committed to guiding individuals to sustainable finances, so that they can live a life they can afford, today *and* tomorrow.

Our approach to sustainability

Sustainability is an integral part of Alektum Holding's culture, values, and business and the work is based on our vision "To help and inspire people to live a life they can afford".

We aim to contribute to a more sustainable economy and contribute to reducing over-indebtedness. In response to the growing challenge of defaulting payments amid rising interest rates and inflation, our ambition is to help and inspire individuals in achieving balanced personal finances. By enabling individuals to become debt free, and providing advice and support, while ensuring that companies get paid, we promote a sound economy for society at large.

Through our sustainability framework, we prioritise areas where Alektum Holding can have the greatest impact, building long-term value. We believe that sustainable business practices create long-lasting value and help mitigate risks. To realise our commitments, the sustainability agenda is set by the Board and the Management Team and is characterised by:

- ✔ We conduct fair and ethical debt collection
- ✔ We see each person, and their unique situation, behind every debt, and treat them accordingly
- ✔ We have a great commitment to help and inspire others to balanced personal finances
- ✔ Our way of working promotes social and economic sustainability for our customers, debtors, and employees
- ✔ We see human rights, integrity, privacy, and respectful treatment of everyone as top 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

The business landscape is changing in pace with growing impacts of climate change, evolving consumer- and payent behaviors, macro-economic factors, and demographic shifts. They all have implications on people's well-being and the way we do business. As an outcome of the materiality analysis, we identified four prioritised areas that have a great business impact and an impact on the society around us.

This year we conducted the first part of a dual materiality assessment supported by independent experts, with the goal to assess the impact our business has on the planet and society, as well as its impact on our business. The materiality analysis was conducted by selecting sustainability areas based on the most material sustainability aspects in our industry. These areas were then used in a survey and ranked in terms of relevance and impact by key employees from various Group functions. The materiality analysis guides our strategic direction and how we integrate sustainability in our business. It also sets the foundation for this sustainability report. Going forward, we aim to further align this with CSRD and ESRS.

Stakeholder groups

Alektum Holding collaborates with a diverse range of stakeholders, including customers, employees, owners, regulators, and the communities around us. These groups provide valuable perspectives that help us identify material topics and guide our strategic priorities. Their input ensures we remain aligned with evolving needs and expectations, driving progress toward our sustainability goals.

The strategic direction for our work with sustainability issues is determined by the Board and the Manage-

ment Team, who is also ultimately responsible for these issues.

Stakeholder engagement

We have a strong focus on value creation for customers, employees, owners, and society. Through our sustainability work, our stakeholders can feel secure that we take responsibility for the impact on our business, as well as the impact our business has on the world around us. Stakeholder engagement is fundamental to shaping our sustainability agenda and ensuring alignment with expectations. By actively collaborating with customers, employees, partners, owners, and communities, we gain valuable insights that guide our decision-making and help us address key societal and business challenges. Through continuous dialogue and collaboration, we aim to foster trust, create shared value, and drive impactful, sustainable solutions across all our markets.

Policies and governing documents

Alektum Holding has a set of policies and processes in place to mitigate risk and prevent negative impacts, as well as processes outlining how to respond appropriately should negative impacts occur.

All employees are responsible for ensuring that our policies are adhered to. The purpose of the Group's

policies is also to provide an effective framework for our corporate governance standards and for realising our commitment to actively working with our social, environmental, and economic impact. Through solid routines and processes, proactive work, regulatory compliance, and high business ethics, we ensure that risks are reduced and that we deliver value to our customers, debtors, employees, and owners.

Our policies apply to employees, associates, and third parties who undertake activities on behalf of, Alektum Holding. The policies apply to the products and services we procure, our operations, and the services we provide to our customers and debtors, including, but not limited to, policies such as:

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

Sustainability considerations are woven throughout a suite of these interdependent policies and procedures.

4 Key Areas for Lasting Impact

With over 600 employees across Europe, we recognise that our activities have a wide-ranging and interconnected impact on the economy and society around us. In recognising this, Alektum Holding is committed to contributing to a more sustainable society and to continually minimising any potential negative impact and improving the positive impact we make.

Our goal is to embed sustainable thinking and awareness across the organisation, to ensure compliance with all relevant legislation and standards, and to continue to develop services that meet the needs of indebted individuals. We aim to integrate a sustainability perspective as a natural element in everything we do because we believe that it creates long-term value for our customers, employees, the company, and society. Alektum Holding's sustainability strategy is now fully integrated in the business strategy to better align our efforts.

At the core of our sustainability strategy are four integral components that underscore our commitment to responsible business practices and long-term societal impact. By integrating these components, we aim not only to mitigate negative impacts but also to actively contribute to a more sustainable and equitable future.

In this sustainability report, we describe how we make a difference, the material topics that are relevant to us and our stakeholders, as well as expected goals, risks and outcomes.



Fair and Ethical Debt Collection

Fair and ethical debt collection practice is vital to our business. We, therefore, have extensive educational programs for our employees so that they can provide the best service to both customers and debtors. At the same time, we have implemented solutions that ensure a smooth experience tailored specifically toward each debtor.

We aim to exceed customer expectations by the way we conduct business and through the respectful treatment of defaulting payers.



Governance

Compliance and privacy protection are top priorities for us as we operate in a highly regulated industry. We have a strong focus on activities related to data privacy and information security and policies and procedures have been adjusted to reflect the risk situation.

Regular compliance audits are carried out at a Group level, such as audits regarding disputes, debt collection, and GDPR. Internal courses are held regularly to ensure awareness and knowledge.



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 raising the issue of over-consumption and financial literacy, and working actively to counteract it, we thereby also minimise the risk of over-indebtedness.



Sustainable Workplace

We believe that a sustainable workplace is vital to both engagement and to a better customer experience, which is why we strive to provide healthy working conditions and an inclusive culture free from all forms of discrimination.

We aim to be perceived as a preferred employer. We have zero tolerance of workplace harassment and discrimination. Everyone is treated with equality, dignity and respect.

Targets



To help our customers get paid by guiding their defaulting payers, while continuously adhering to social and economic sustainability in all decisions.

To treat everyone fairly and with dignity and respect.



To contribute to increased financial health and counteract over-indebtedness

To maintain the highest standard when it comes to privacy protection, integrity, and secure data management



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

Consumer debt is rising across Europe, driven by inflation, economic uncertainties, and changes in consumer behavior. This impacts individuals, businesses, and society. By promoting fair and ethical debt collection, we support financial stability and reduce economic risks.

Our ambition

Alektum Holding aims to set the standard for ethical debt collection by combining technology and compassion. We strive to deliver personalized solutions that benefit debtors and creditors while ensuring compliance, transparency, and sustainable practices.

Targets

■ Ensure Accessibility

- Improve access to information, payment options, and communication channels for all debtors, regardless of their circumstances
- Increase the use of data-driven, AI-powered tools to develop sustainable repayment plans tailored to individual debtor needs.

■ Continuous training for staff

- In Sweden and the Netherlands, for example, our operations staff undergo a rigorous certification process designed to enhance expertise in debt collection. This comprehensive program combines in-person workshops, self-paced e-learning, and regular assessments, culminating in the industry-recognized title of "Certified Debt Collection Officer."

■ Enhance customer and debtor satisfaction

- Quarterly debtor surveys are sent out to measure the debtor experience with us.
- Customer satisfaction is measured regularly through surveys and in-dept interviews.

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. Concurrently, 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 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.

Complaints can be submitted directly to Alektum Holding, to authorities, or to industry organisations that supervise the debt collection industry. Alektum Holding's incident policy intends to handle complaints in the best possible way.

In the majority of countries where Alektum Holding operates, debt collection is strictly regulated through specific debt collection acts and regulations, requiring a license to operate. Many of the supervisory authorities and/or associations have additional certification requirements for both debt collection companies and their employees. Alektum Holding has all mandatory certifications and licenses in place.

To ensure compliance with debt collection standards, training and awareness campaigns are available, and in some cases mandatory, to all our employees. It is key that all of our debt advisors have a solid understanding of debt collection regulations and how to approach and handle each individual debtor's situation.

Accessibility

Accessibility lies at the heart of our approach to debt collection, ensuring a fair and inclusive environment for everyone. We are committed to creating communication channels, payment options, and processes that are simple to navigate and tailored to diverse needs, regardless of individual circumstances. By embedding accessibility into everything we do, we strive to provide a seamless and respectful experience for debtors while fostering effective communication. This commitment extends to our IT systems, designed to be inclusive and considerate of the varied needs and abilities of all users.

Adapting to a changing world

Consumers today have high expectations when it comes to rapid communication and access to information. Our goal is to proactively adapt to evolving consumption patterns and payment behaviors. As part of our ongoing commitment to innovation, we are consistently expanding self-service options, introducing additional payment methods, and ensuring

Organisations

Country	Debt Collection Association or organisation	Membership
Sweden	Svenska inkassoföreningen	Member of the Board
Norway	Virke inkasso	Yes
Denmark	Dansk InkassoBrancheforening	Yes
Germany	BDIU	Yes
	Bundesvereinigung Kreditankauf und Servicing (BKS)	Yes
	ibi research	Yes
	ECC Club from the IFH Köln GmbH	Yes
Austria	Inkasso Verband Österreich (Debt collection association)	Yes
	Swedish chamber of commerce	Yes
	KSV1870 (Kreditschutzverband)	Yes
Switzerland	Inkasso Suisse	Yes
	CRIF	Yes
	Swedish chamber of commerce	Yes
Belgium	Socrem	Member of the Board
Netherlands	NVI	Yes
	AFM	Yes
Poland	ZPF	Yes
	PZZW	Yes
	Scandinavian-Polish Chamber of Commerce	Yes
	Lower Silesian Chamber of Commerce	Yes
Czech Republic	Asociace inkasních agentur (AIA)	Yes
Slovakia	Asociácia slovenských inkasných spoločností (ASINS)	Yes



“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.”

debtors have convenient access to information about their debts.

Debtor survey

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 ensure that, we send out a debtor satisfaction survey on a regular basis, to those debtors who have been in contact with us. For 2024, 80% of all the debtors surveyed were satisfied with the overall experience at Alektum Holding.

Socially responsible collection

We have been awarded the highly esteemed “Socially Responsible Collection” (SVI) Quality Mark. The recognition signifies our commitment to fairness, compassion, ethical practices, and our dedication to treating debtors with respect.

The SVI quality mark serves as a symbol of excellence and responsible debt collection within the industry in the Netherlands. It sets stringent standards and guidelines for debt recovery agencies. Holders of the SVI Quality Mark are characterised by their strong involvement in developments in society. They show not only in words, but also in deeds that they are willing and able to assume their social responsibility as a debt collection service provider – both towards the debtor and the creditor.

Risk analysis

The risk of not treating our debtors in a fair and ethical way is mitigated through policies and guidelines to ensure compliance and quality. Extensive training is provided to employees to prevent unreasonable consequences or unnecessary inconvenience to the debtor. The debtor’s right to privacy must always be respected and we always aim to find sustainable solutions for our customers and debtors. Our “customer check” process is also an important part of reducing risk, as is the follow-up process regarding reported complaints.

Governance

Prioritising compliance with legal standards and implementing effective risk management practices are fundamental principles for Alektum Holding. With a commitment to upholding regulatory requirements, our comprehensive approach across our markets ensures a robust framework that aligns with ethical business practices and safeguards against potential risks, reflecting our unwavering dedication to operating with integrity and responsibility.

For Alektum Holding, compliance work entails ensuring adherence to applicable legislation in every country where the company operates, while upholding best practices in debt collection and robust risk management. This involves, among other responsibilities, identifying and mitigating risks related to applicable local regulations, such as the Debt Collection Act and current general data protection legislation (GDPR). Regular compliance audits are conducted at both the Group and local levels, ensuring rigorous oversight. Additionally, Alektum Holding's staff receives ongoing training in GDPR, debt collection laws, and information security to maintain high levels of awareness and expertise. To further strengthen compliance, Alektum Holding employs dedicated compliance officers in all business regions, ensuring adherence to regulations across all the countries in which we operate.

Following Alektum Holding's Incident Standard, any operational deviations that involve violation of law or internal regulations, risk of loss of business, etc. must be registered. These deviations are analyzed and the results of this is used to improve processes, eliminate or mitigate legal risks, and identify security flaws. Any conclusions that lead to a proposed change are presented to Alektum Holding's Risk Committee.

Our Group Compliance Director acts as an independent control function in regulatory compliance and reports directly to the Group CEO and the Group Board of Directors.

The overall mission of the Group Compliance Director is to improve and streamline the framework for regulatory compliance within the business. The work is based on a risk-based approach to monitor, identify and follow up risks within the business that may lead to revoked operating license (if applicable), sanctions from regulatory authorities, and/or damaged reputation.

We have established a Group common agreement and customer onboarding process that aims to ensure regulatory compliance with applicable local laws and minimize risks. Furthermore, the process has been established to simplify and create even better conditions for starting new customer collaborations. We strategically evaluate and select customers and debt portfolios, as outlined in our Customer Policy. For instance, before any new customer agreement is entered into, or if terms are changed with existing customers, a Customer Check is performed. The intention of this is to identify any risks that may be associated with the ongoing partnership or new collaboration, including, but not limited to, the risk of insolvency, the risk that the customer takes measures that may involve violations of applicable local law or risk of loss of license or authorization.

Risk management

Alektum Holding emphasizes the importance of identifying, analyzing, and managing risks proactively to protect both customers and the business. By applying a systematic and

Why it matters

Strong governance is the foundation of a sustainable and resilient business. In a rapidly changing regulatory environment, maintaining compliance, safeguarding data privacy, and fostering ethical conduct are critical to building trust with stakeholders and protecting sensitive information.

Our ambition

To uphold the highest standards of governance by continuously strengthening compliance, integrity, and ethical practices. We are committed to ensuring robust risk management, protecting customer and company information, and aligning our governance framework with CSRD and ISO 27001 principles for greater transparency and accountability.

Targets

- **Achieve ISO 27001 Certification**
 - Implement and maintain an information security management system that meets ISO 27001 standards.
- **Regular training for staff**
- **Enhance compliance and risk management**
- **Strengthen data protection**



structured approach, we ensure that potential threats are detected at an early stage and that appropriate measures are implemented to minimize impact.

This approach involves several key steps. First, all risk owners within the Group conduct a thorough yearly risk assessment to identify potential vulnerabilities and threats. This includes evaluating both internal and external factors that could pose a risk to the company's operations. Examples of internal factors might include operational inefficiencies or employee-related risks, while external factors could encompass economic fluctuations, regulatory changes, or cyber threats.

Once risks are identified, we analyze the likelihood and potential impact of each risk. This analysis helps us prioritize what risks need to be addressed immediately and which ones can be monitored over time. The company uses system tools and methodologies to ensure accurate and comprehensive risk evaluation.

After the analysis, we implement risk management strategies which may include preventive measures, such as enhancing cyber security protocols, improving operational processes, or conducting regular employee training sessions. In cases where risks cannot be entirely prevented, contingency plans to mitigate the impact if the risk materializes are established.

Moreover, Alektum Holding fosters a culture of continuous improvement and risk awareness across the organization. Employees are encouraged to report potential risks and suggest improvements, ensuring that risk management is a collective effort. Regular reviews and updates to the risk management plan ensure that the company remains resilient in the face of evolving threats.

Through this comprehensive and proactive risk management approach, we not only protect our customers and business, but also enhance our reputation as a reliable and forward-thinking company. By staying ahead of potential threats, we ensure long-term sustainability and success in a dynamic and unpredictable business environment.

The Group's Risk and Information Security Team is

responsible for controlling, evaluating, and reporting operational risks within the operational business to Alektum Holding's Risk Committee. They also propose measures and routines to streamline the internal control environment.

Alektum Holding's Risk and Information Security function is structured in accordance with a defined risk methodology including specially appointed risk owners throughout the organisation. The risk owners are responsible for identifying, managing, and grading the risks. If a risk is graded above a certain level and cannot be mitigated, the risk is escalated to Alektum Holding's Risk Committee which is chaired by the CEO. Risks above a certain level are also reported to the Board of Directors.

Privacy protection

The debtor's right to privacy and integrity is crucial as it is an important human right and an obvious part of good customer- and debtor relations. It is based on high standards and compliance with laws and internal regulations that specify how data is to be protected or used. We have a strong focus on activities related to data privacy and information security and policies and procedures have been adjusted to reflect the risk situation.

The large amount of personal data we handle means that integrity and secure data management are crucial. We have both a legal and ethical responsibility to handle sensitive information in a way that guarantees respect for personal integrity and complies with the human right to freedom from unauthorized/arbitrary interference in privacy. The basic principle for our data management is that we only process personal data that is necessary and for which we have a legal basis.

Appointed compliance officers are responsible for monitoring and follow-up on compliance with GDPR which aims to ensure that the Group handles personal data correctly. Besides the compliance officers, the way of working with risk owners within the Group has created an awareness about GDPR among the entire

staff. And by implementing the latest changes regarding GDPR, through updating internal routines and way of working, as well as the provision of training for all employees we aim to secure and constantly raise the level of competence regarding data privacy matters.

Information security

With regard to human rights, integrity, and the large amount of data we handle from our customers, information security and data management are part of our most important focus areas. During 2024 we have made a lot of changes to our information security management system to provide a better foundation for dealing with new risks related to the information we manage. Our risk management framework has been reworked to provide better coverage of all areas of risks related to information security.

We have also introduced a new information security awareness program which has led to a significant improvement in understanding of information security among our employees. This is just a small portion of the current project to change the way we work with information security with a lot more to come in the next few months.

We continue to develop our proactive work with risk owners and incident reporting to identify and prevent sensitive data from being handled incorrectly. In the event an incident or data breach concerning personal data or otherwise sensitive information, we have routines in place to ensure that the incident is raised internally, documented, and assessed. Every incident is assessed to identify root causes that can result in more incidents.

To keep up with the rapid development that is currently taking place within technology, legislation and world developments our employees are continuously updated on new legislation, threats and best practices.

Code of conduct

Our Code of Conduct, is a part of the internal governance at Alektum Holding, which applies to all employees, consultants, and third parties working on behalf of Alektum Holding, sets out the values that shape our behavior and guide us in how we conduct our business and outlines Alektum Holding's corporate policies. New employees receive training in the Code of Conduct as part of the onboarding program. We expect our business partners and suppliers to adhere to the same, or similar, principles as Alektum Holding.

No transactions or collaborations are entered into that do not measure up to the requirements and expectations as outlined in our Code of Conduct.

Zero tolerance against all forms of corruption and financial crime

It is vital that we act ethically correct in all parts of our business. We never accept corruption in any form. Our work against corruption is proactive for early detection and prevention. We are strongly committed to complying with all applicable rules and regulations, as well as the permits and authorisations that we hold in each of the countries in which we operate. Alektum Holding has several functions and processes with the aim of, among other things, preventing corruption and other financial crime.

As we conduct business on several European markets and process millions of transactions each year, we are exposed to risks related to financial crime and corruption. Our Code of Conduct provides guidance to our employees and all third-party representatives of the company, on how we should act to manage and mitigate these risks.

We closely and carefully evaluate and select customers and debt portfolios, as outlined in our Customer Policy. Before any new customer agreement



is entered into, or if terms are changed with existing customers, a Customer Check is done. An integration and onboarding process, including an obligatory procedure for “Customer Check” has been implemented within the entire Group. A Customer Check must be carried out both before new customer partnerships are initiated and during our collaboration to ensure proper quality and minimise e.g. corruption risks.

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

For new customer partnerships, Customer Checks are reviewed by Alektum Holding’s Compliance Director, who conducts an in-depth investigation of the customer if any ambiguities are identified. The intention of this is to identify any risks that may be associated with the partnership or collaboration, including, but not limited to, the risk of insolvency, or the risk that the customer takes measures that may involve violations of the law.

Within certain parts of the Alektum Holding operation, there are requirements for extended controls regarding financial transactions. In order to fulfil these additional legal requirements, we have acquired a support system called Trapets with the aim to monitor financial transactions.

No transactions or collaborations are entered into that do not measure up to the requirements and expectations as outlined in our Code of Conduct.

Employees are encouraged to report suspected irregularities related to e.g. corruption and financial crimes through the anonymous whistleblowing channel.

Risk analysis – corruption

Within the risk classification framework, we evaluate corruption risks throughout our organisation as well as activities in the following categories:

- Risks linked to clients in each industry
- Geographical risks
- Internal risks
- Implementation risks

As a pan-European company, we are, like many other companies, exposed to corruption risks. Attempts at corruption, bribery, or money laundering can be directed at us/our employees in various contexts and in contacts/relationships with various stakeholders. It is therefore a risk that employees can be influenced by external parties that benefit interests other than Alektum Holding’s. Notwithstanding, the debt collection business is not subject to money laundering regulations, Alektum Holding has chosen to obtain corresponding information from customers on a voluntary basis, to obtain knowledge about our customers and the customer’s ownership, or through the payment transactions that are made.

Whistleblowing

Alektum Holding provides an anonymous whistleblowing channel through an external provider, ensuring objectivity and confidentiality. Reports are managed by an external whistleblowing unit at a reputable law firm, further reinforcing impartiality. The whistleblowing reporting page is easily accessible across the Group and available in multiple languages to encourage reporting in all subsidiaries. Suspected irregularities that are reported within the whistleblowing system are carefully investigated according to internal routines and regulatory requirements. Alektum Holding is highly committed to compliance and ethical conduct, ensuring that all reports are addressed promptly, with

necessary steps taken to prevent bribery, corruption, or violations of our policies.

Risk analysis – whistleblowing

Despite our active approach, it is not possible to fully protect the organisation from different types of incidents and violations. However, to obtain the highest possible level of compliance and to detect deviations, we strive for all employees and other parties to feel safe in reporting incidents that violate regulations, internal instructions and/or ethical guidelines. We therefore urge them to always report suspected violations, e.g. through the whistleblowing system.

Respecting human rights

Respect for human rights is fundamental to our business. Although our exposure to risks connected to human rights is considered to be relatively low, our commitment is deeply embedded throughout the organisation, both in terms of protecting the privacy and integrity of our customers and debtors, but also in terms of social engagement, and equality, dignity, and non-discrimination.

Alektum Holding employees, suppliers, or others that suspect or become aware of any human rights violations in connection with our operations, shall report it immediately to their manager, human resources, legal, or through the independent whistleblower channel, in accordance with the company’s whistleblower procedure. We aim to continue our ongoing efforts to identify, assess, and manage human rights impacts and risks.



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

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. The language of money is foreign to a lot of people, and often even a taboo topic, and we see that a large portion of the population lack basic financial skills. In the face of an increasingly strained economic climate, financial stress is mounting. We also 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.

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 and Shop Lagom, we aim to increase people’s knowledge of personal finances and instil 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 preschool 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 guardians 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.

As society has become more cashless, the value of money has become more or less an abstract concept, and all the more difficult for parents to explain to their children. Through the Penny Pep, we aim to inspire parents through educational content, and to give them



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 partly on increasing the knowledge of personal finances and thereby contributing to reducing over-indebtedness in society. But 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.

the tools and information that promotes financial self-confidence and good money-managing habits.

We actively connect with parents through channels such as our website, our podcast, lectures, and various social media platforms like Instagram, where we have more than 35 000 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.

By raising the issue of over-consumption and questionable financial decisions, and working actively to counteract that, we thereby also minimise the risk of over-indebtedness.

Risk analysis

A prevalent risk in this area is that people would perceive us, as a debt collection company, to negatively influence the level of indebtedness, instead of maintaining the payment moral in society, which would have negative consequences for our customers as well as for the Alektum Holding brand. We manage this risk through extensive training for our debt advisors, through initiatives as listed above, as well as careful selection of customers and debt portfolios.

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's how it's been since the beginning 30 years ago, and that's how we would like it to continue. We believe our employees are our greatest assets, integral to our success and long-term growth. While this year has presented challenges, we have taken significant steps to strengthen our Employee Value Proposition (EVP). Our commitment remains firm: to create a workplace where our employees thrive, feel valued, and grow together with us.

We aim to be an employer of choice, attracting and retaining talent by offering meaningful development opportunities and a positive work environment. Guided by our values and respect for human rights, we ensure a workplace free from discrimination, harassment, and abusive behavior. This is governed by our Code of Conduct and Workplace Environment Policy, setting clear standards for respectful and ethical conduct.

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.

Talent management

Our employees' competence, dedication, and well-being are vital to Alektum Holding's long-term sustainability and success. This year, we have focused on strategic talent management by aligning recruitment, development, and retention with our long-term goals.

- ✔ We provide equal opportunities for learning and skills development, fostering a collaborative and inclusive environment.
- ✔ All employees are encouraged to contribute to the company's growth by embracing our Key Behaviors: supporting teams, improving performance, and reflecting on how we can make a difference for our clients.

- ✔ Our new e-learning platform supports continuous professional development, ensuring our teams are equipped to deliver excellent service and compassionate solutions.

Managers play a crucial role in leading teams aligned with our strategy and values. Through ongoing training, we empower our managers to inspire their teams and drive performance. Our performance management program connects company goals with individual and team objectives, ensuring transparency and accountability.

Health and wellbeing

Employee well-being is a cornerstone of our ability to attract, nurture, and retain top talent. Managers are pivotal in detecting and preventing health issues, fostering a supportive and healthy work environment. We encourage employees to maintain a strong work-life balance and use their wellness allowance to engage in physical activities. By promoting mental and physical health, we aim to create a vibrant, energetic workforce.

Risk analysis

Our employees are our most valued asset and a vital resource to deliver results and value to our customers. Without the right person on the right job and the processes and tools to support that, we risk negative employee contentment, low customer satisfaction scores, poor company performance, and potentially damaging the brand.

Why it matters

Our employees are the foundation of Alektum Holding's success. Their well-being, engagement, and skills drive our ability to deliver value to customers, create sustainable growth, and maintain a strong corporate culture. A supportive, inclusive, and respectful workplace is essential to attracting and retaining top talent, fostering innovation, and achieving long-term strategic goals.

Our ambition

To be an employer of choice where employees feel valued, thrive, and grow alongside the company. Alektum Holding is committed to cultivating a workplace that prioritizes well-being, inclusion, and development opportunities. By fostering a culture of respect and accountability, we aim to ensure that every employee feels connected to the company's mission and empowered to make a difference.

Targets

Strengthening our EVP

To foster continuous improvement in engagement and performance, we measure the "employee temperature" weekly, enabling active participation and input. The Employee Satisfaction Index tracks satisfaction, loyalty, and alignment with our mission, alongside parameters like personal development and leadership. Insights guide initiatives to strengthen our culture, values, and employer brand.

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.

Significant risks associated with our personnel include deficiencies in diversity, gender equality, and inclusion, as well as unfair treatment relating to salaries and benefits. These risks could all potentially negatively impact Alektum Holding's culture and work environment, our employees' engagement, as well as cause damage to the brand and the trustworthiness of the company.

Other significant risks include ensuring effective talent management, i.e. attracting and retaining key talent critical to the organization's success.

Risk mitigation is handled by HR policies and guidelines, the code of conduct, ongoing employee- and leadership training, collective agreements, as well as continuous surveys through Winningtemp.

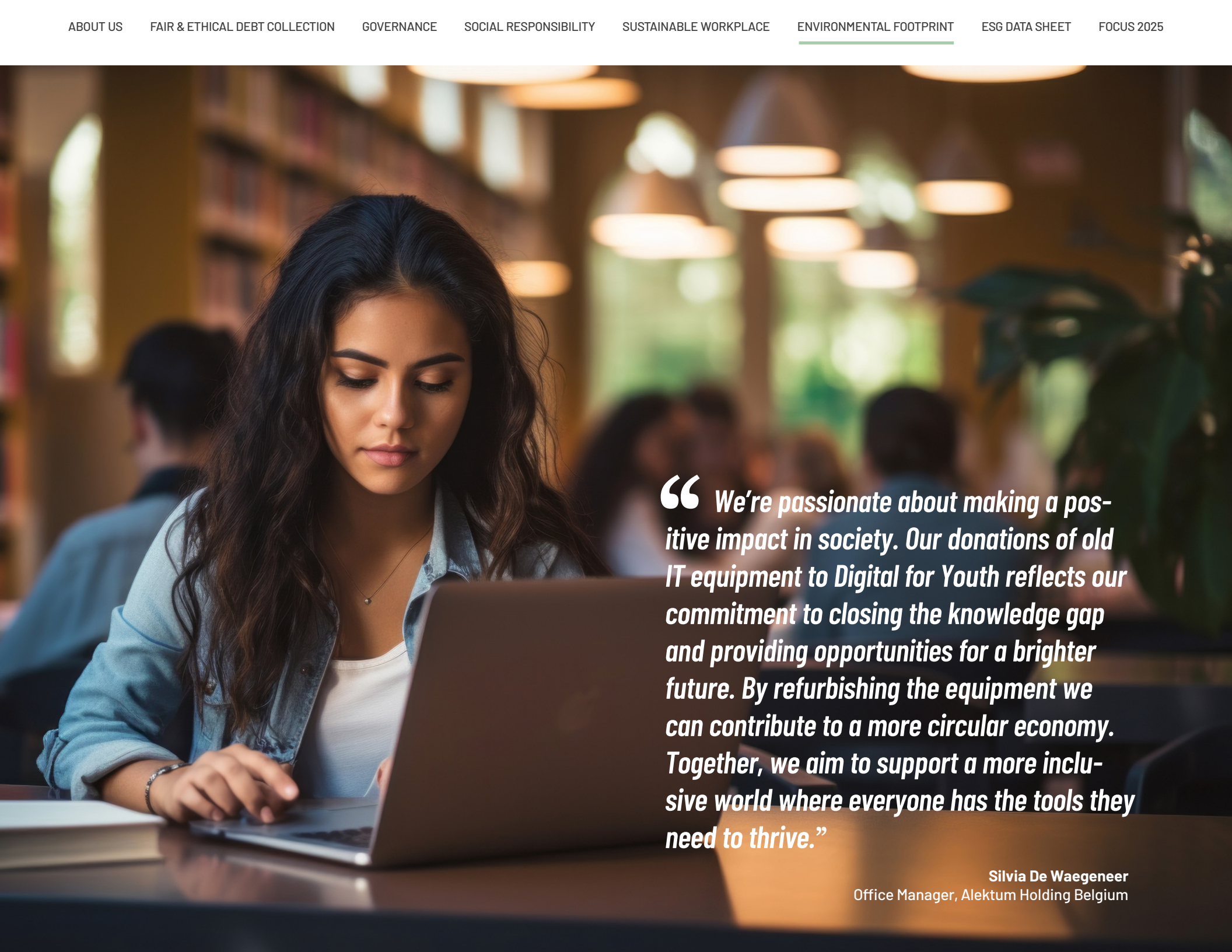
Targets

Measuring the "employee temperature" weekly gives us an additional channel for employee participation and input. The Employee Satisfaction Index measures satisfaction and loyalty, and to what extent the employees take responsibility for, and feel involved in the company's mission. Along with this, a number of other parameters are also measured, such as personal development, stress, and leadership to ensure the wellbeing of our employees. This enables us to work with continuous improvements concerning employee commitment and leadership performance and to guide our ambition to be an employer of choice. From that knowledge, we also implement the initiatives needed to build internal brand ambassadors, as the focus remains on further strengthening the Alektum Holding culture and values, and the employer brand.

Furthermore, our goals include:

- ✔ Zero tolerance of workplace harassment and discrimination. Everyone is treated with dignity and respect.
- ✔ Employee satisfaction must reach at least the Winningtemp index.
- ✔ We strive to reduce work-related stress illnesses.
- ✔ Achieve diversity at all levels.
- ✔ Equal opportunities and treatment for all





“ We’re passionate about making a positive impact in society. Our donations of old IT equipment to Digital for Youth reflects our commitment to closing the knowledge gap and providing opportunities for a brighter future. By refurbishing the equipment we can contribute to a more circular economy. Together, we aim to support a more inclusive world where everyone has the tools they need to thrive.”

Silvia De Waegeneer
Office Manager, Alektum Holding Belgium

Minimising our Environmental Impact

While Alektum Holding's direct environmental impact remains relatively minor, we remain committed to reducing it further. Key focus areas include resource usage, energy consumption, business travel, and the lifetime management of IT equipment. By addressing these areas, we foster a culture of environmental responsibility and contribute positively to broader sustainability efforts.

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 within the company are informed about the environmental policy. It is the responsibility of each manager to ensure that employees who are affected by specific goals, rules, routines, or other information, grasp and adapt their behaviour to them. We also aim to reduce the negative environmental impact of the organisation by further improving processes and systems.

To reduce our environmental footprint, we continuously refine our processes and systems. Suppliers are required to comply with Alektum Holding's Code of Conduct, ensuring alignment with our standards.

Our goal is 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. In addition to using train travel and improving waste sorting, we can also make sure the lights are out at the end of the day, avoid unnecessary paper printing, and opt for digital meetings whenever possible, among other measures.

A more digital way of working

The digital transformation of products and services is reshaping industries, and Alektum Holding is no exception. Transitioning to digital processes helps us reduce paper usage and streamline communication with employees, customers, debtors, and suppliers. Increasing the share

of digital communication, particularly with debtors, has significantly reduced paper usage. The digital share is steadily growing, decreasing our rate of mailings, and the goal is to further increase that in the coming years.

Energy usage

We use clean energy sources in the majority of our offices; however, the availability of renewable energy varies across regions. We always choose sustainable and energy-efficient solutions. The largest energy consumption for Alektum Holding is the data and server centres.

Our headquarters are certified by REEAM In-Use, which is a certification that shows that the property meets high standards in a number of sustainability categories, including energy consumption and waste management.

Changing the way we travel

Alektum Holding is present in many locations which means that travel has been a notable source of GHG emissions for us historically. However, advancements in remote technology have allowed us to adopt a more sustainable travel approach. We promote and encourage our employees to choose, environmentally friendly modes of transport and aim to increase utilisation of video conferencing. Our goal is to utilise technology for business meetings as much as possible and travel only when necessary for delivering the quality of service that our clients and stakeholders expect. Furthermore, we always promote train travel for our employees on domestic travel.

Why it matters

Environmental sustainability is not just a responsibility but an opportunity to create long-term value for society and our business. While Alektum Holding's direct environmental impact is small, addressing resource use, and embracing sustainable practices, we reduce operational risks, and align with stakeholder expectations.

Our ambition

Alektum Holding is committed to continuously minimizing our environmental impact by fostering a culture of responsibility and innovation. Our ambition is to lead by example, from transitioning to digital processes to reducing emissions from travel and improving energy 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.

We carefully consider the need to provide our employees with company cars or benefit cars. When such a need has been found to exist, we primarily choose to provide cars with low emissions and low fuel consumption. Goals are set for the business to greatly increase the use of environmentally friendly, non-fossil fuels, as well as requirements for measures to reduce our total fuel consumption. We aim to only have cars with non-fossil fuel drive trains, by the end of 2028.

Resource usage and circularity

We actively incorporate circular thinking into our resource management:

Additionally:

- ✔ The majority of our office locations are located in environmentally friendly buildings.
- ✔ All offices have recycling of paper and systems for waste sorting to secure proper handling.
- ✔ We use printers and scanners in our offices that all give us a second chance to decide whether or not the document should be printed.
- ✔ Electronic waste, such as computers and phones, is responsibly reused or recycled through end-of-life programs, ensuring secure data erasure and environmentally sound disposal.

Risk analysis

Businesses can play a very important role in reducing the environmental and climate impact, and we see it as our responsibility to minimise our impact wherever possible. Not being able to do so in all our markets is an identified risk. Important internal governing documents to mitigate this include our environmental policy, travel policy, procurement policy, our policy regarding company cars, and our code of conduct.



2022

2023

2024

E

Environmental Aspects			
The digital share of mailings sent to our debtors	51% (Sweden) 21% (Group total)	66% (Sweden) 64% (Group total)	82% (Group total)
Percentage of digital invoices sent to clients	84%	90%	89%

S

Social Responsibility			
Brand awareness CSR initiatives (Measured annually)	Penny Pep 22% Shop Lagom 20%	Penny Pep 26%	Penny Pep 26%
Sick leave Operations total. The total for the Group was measured starting 2023	7.8%	6.4%	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 0.2%	Growth 12.3%	-12.8%
Winningtemp participation rate	76%	79%	78%
Employee satisfaction Measured as a temperature through Winningtemp, where the goal is to equal or exceed their index at 7.4.	7.4	7.8 (Index 7.6)	7.2 (Index 7.3)
Employees' perceived work situation Measured as a temperature through Winningtemp, where the goal is to equal or exceed their index at 6.9	7.2	7.6 (Index 7.1)	7.3 (Index 7.1)
Gender diversity	Board: 17% women MT: 44% women	Board: 17% women MT: 33% women	Board: 17% women MT: 30% women

G

Corporate Governance			
The number of reported incidents within the frame- work of our whistleblowing system	0	0	1
Number of incidents involving loss of customer data	0	1	1
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 in our overall strategy and aligning our goals accordingly. Going forward, we will focus on aligning our efforts with the Corporate Sustainability Reporting Directive (CSRD) and setting clear ambitions and targets to guide us.

Key focus areas for 2025

- ✔️ CSRD Compliance and Double Materiality Assessment, as well as ensuring alignment with the European Sustainability Reporting Standards (ESRS)
- ✔️ Review and update internal governance, policies, and guidelines related to sustainability
- ✔️ Review internal governance for sustainability and update relevant policies and guidelines.
- ✔️ Review processes and working methods and further embed sustainable thinking and processes across operations and all our markets.
- ✔️ Continue strengthening data security measures to safeguard information and mitigate risks.
- ✔️ Further develop our CSR initiatives to make an even greater impact, as well as developing channels for information that promotes financial literacy.
- ✔️ To strengthen Alektum Holding's employer brand and employer value proposition (EVP), with a focus on efforts in employee engagement, increased knowledge-sharing, and long-term competence supply.
- ✔️ Improve systems for traceability and quality assurance in sustainability reporting.

By creating structured and measurable approaches to sustainability, we are committed to driving a positive impact and achieving long-term value for our stakeholders.

