

03

Sustainability report

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CEO Statement

In 2021, the Covid-19 pandemic continued to have a big impact on societies around the world, with lockdowns, travel restrictions and isolation requirements affecting everyone's lives. B2Holding has continued to prioritise employees and customers in its response to the pandemic to ensure that they receive the support needed. The procedures and protocols that were introduced in 2020 have proved resilient throughout the pandemic and we have managed to ensure both safe working conditions and continuing operations.

I would once again like to express my gratitude to all B2Holding Group's employees for their efforts throughout the pandemic. I am proud of how our employees have handled the challenges presented during this time and how they have contributed to limiting the operational impact of the pandemic on B2Holding.

As we are writing this report there is a new humanitarian crisis developing in Europe with the Russian invasion of Ukraine. B2Holding has several countries bordering the conflict area and have supported the refugees through a donation to the UN Refugee Agency in addition to local initiatives such as special guidelines for customers impacted by the war and voluntary work. We are closely following the development of the war and considering measures for the longer term.

In 2021, B2Holding has progressed its commitment to becoming a truly sustainable company. The Group's main achievements in this regard were to confirm the sustainability strategy with the Board of Directors and committing to the Science Based Targets initiative (SBTi). We believe that everyone, including the private sector, plays a role in transitioning to net-zero, that committing to using targets that meet SBTi's criteria is the best way to achieve it, and that it is robust and valuable for the shareholders.

B2Holding's sustainability strategy will not only contribute to achieving the SBTi commitment, but also its broader sustainability ambitions, which include social, governance and environmental issues. The strategy until 2023 focuses on developing the Company's performance in four key areas. The goals have been developed through a mapping of our impact to the UN Sustainable Development Goals (SDGs) and a

desire to be a company that acts responsibly towards society.

Ethical and responsible collections have always been the core of our approach to business. The pandemic has shown that this is more important than ever. We take our responsibility seriously which is why B2Holding became a member of the UN Global Compact in the beginning of 2021. The Group has committed to the Ten Principles of the Compact and incorporates them into its strategies, policies and procedures.

Going into 2022, we are in a stronger position than ever to achieve our sustainability goals. We have been ranked as the number one company in our sub-industry of consumer finance by Sustainalytics and are assessed to have negligible ESG risk. In addition, our ESG reporting rating from the ESG100, provided by The Governance Group, has risen from E to C on the scale from F to A+, demonstrating that we are maturing in this area. This provides us with a strong foundation to continue our sustainability journey.

This sustainability report has been prepared based on the Global Reporting Initiatives (GRI) standards, the Euronext ESG Guidelines for listed companies and reporting requirements set out in Section 3-3c of the Norwegian Accounting Act. These help us to become more transparent and provide measurable sustainability reporting.

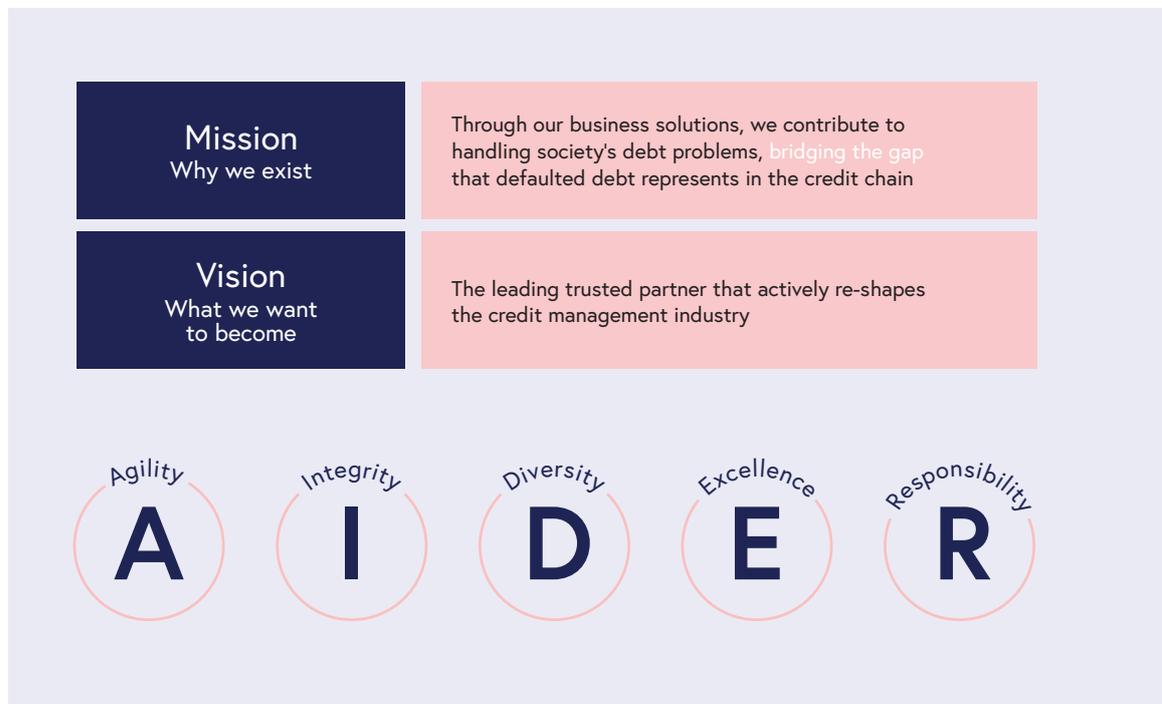
Erik J. Johnsen
Chief Executive Officer

Sustainability in B2Holding

B2Holding’s core values are the heart and soul of the Group. The values guide employees in their work and are a common language that clearly demonstrate B2Holding’s culture. Furthermore, the values describe the behaviours and attitudes of the Group and contribute to achieving its vision and mission.

B2HOLDING BELIEVES IN

- **Agility:** The Group seeks to gain new knowledge and grow. Through constant development, the Group is able to adapt quickly and effectively to changing environments and to the needs of its business partners. B2Holding focuses on solutions, not problems.
- **Integrity:** B2Holding follows the highest ethical principles and does the right thing in all situations. The Group stands for what is right and speaks up in the event of misconduct. It is honest, responsible, accountable, and dedicated, even when challenged. Integrity is the foundation upon which the Group builds trust.
- **Diversity:** B2Holding believes that a multicultural, inclusive, and diverse work environment is an asset. The Group values and respects people of different backgrounds and experiences. B2Holding creates a culture where everyone is welcome.
- **Excellence:** The Group always contributes to the best of its abilities and encourages colleagues to do the same. The Group is committed to continuous improvement. B2Holding drives change and strives to find better ways of doing things. Technology and digitalization are at the top of the agenda to increase efficiency and foster a culture of innovation.
- **Responsibility:** B2Holding is committed to society and the environment. The Group goes beyond compliance and is accountable for its actions.



B2HOLDING'S COMMITMENTS

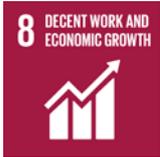
Since 2021, B2Holding has been committed to the UN Global Compact corporate sustainability initiative and its principles in the areas of Human Rights, Labour, Environment and Anti-Corruption. The principles are implemented through internal policies and B2Holding's Code of Conduct, which supports the fundamental goal of building and sustaining long-term relations with all stakeholders by maintaining high ethical standards in every decision made.



B2Holding supports public accountability and transparency and has therefore committed to report on its progress within one year of joining the UN Global Compact and annually thereafter in the form of a Communication on Progress (COP) regarding the implementation of the ten principles. The Group's first COP was published in 2021.

B2Holding recognises that businesses play a key role in achieving the 17 Sustainable Development Goals (SDGs) put forth by the United Nations in 2015. The Group's main contribution as a debt solution provider lies in creating value for society by handling non-performing loans and supporting customers (debtors) in solving their payment challenges, enabling them to return to the financial system.

B2Holding has identified the following SDGs as areas where it can have a meaningful and sustainable impact:

	SDG target	B2Holding's commitment
	5.1: End all forms of discrimination against all women and girls everywhere.	B2Holding is committed to increasing diversity and ensuring equal opportunities for all its employees.
	8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, (...) 8.8: Protect labour rights and promote safe and secure working environments for all workers (...) 8.10: Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance, and financial services for all.	B2Holding is committed to protecting labour rights and ensuring secure and safe working environments within its own operations, as well as to uphold the same requirements throughout its value chain. In 2022, B2Holding will take additional measures to ensure effective implementation of the UN Guiding Principles on Business and Human Rights as well as the Norwegian Transparency Act. B2Holding commits to continuously work to improve the treatment of debtors and debtor satisfaction through corporate standards and complaint management processes. Additionally, B2Holding seeks to improve efficiency in collection processes and ensure good quality standards in order to accelerate the process of reintroducing debtors in the financial value chain.



10.3: Ensure equal opportunity and reduce inequalities (...)

Financial inclusion and fair treatment of labour is at the very core of B2Holding's business. B2Holding continuously seeks to reintroduce debtors in the financial value chain by providing sound financial advice.

Furthermore, B2Holding is committed to increase diversity and ensure equal opportunities for all its employees.



13.2: Integrate climate change measures into (...) policies, strategies and planning

B2Holding maps its own emissions as well as its indirect emissions throughout its value chain. B2Holding is committed to set science-based targets in line with Science Based Targets initiative criteria.



16.5: Substantially reduce corruption and bribery in all their forms

B2Holding has zero tolerance for corruption or bribery as laid out in its policies on Anti-Corruption and Anti-Money Laundering, and through its Whistleblower mechanism. B2Holding continuously seeks to strengthen its legal compliance and transparency in all of its operations.

16.6: Develop effective, accountable, and transparent institutions at all levels

ESG MANAGEMENT

MANAGEMENT AND GOVERNANCE OF ESG

The Group analyses the needs and requests of its stakeholders by conducting materiality analyses and has established a set of minimum KPIs to assess performance. Furthermore, the Group is committed to report significant changes and progress related to its implementation of sustainability on its website.

In line with the Norwegian Code of Practice for Corporate Governance ("the Code") and new recommendations updated on 14 October 2021, the Board of Directors (the Board) considers the sustainability of the Company's objectives, strategies, and risk profiles. The Code's objective is to ensure that considerations of sustainability are closely linked with the Company's activities and value creation. Furthermore, the Norwegian Accounting Act requires that companies provide information on matters relating to the environment, social issues, the working environment, equality and non-discrimination, respect for human rights, and anti-corruption and bribery. The Board identifies and assess which aspects of sustainability are relevant to the Company. In 2021, B2Holding updated its materiality assessment in line with the

requirements of the GRI standards. As such, the Company is confident that its approach to managing sustainability risks and opportunities is compliant with both legal requirements and good practice.

The Head of Corporate Development is responsible for ESG within the Company. In 2021, The Board has organised and authorised the Corporate Sustainability Integration Committee (CSIC) as a committee reporting to the CEO. Led by the Head of Corporate Development, the CSIC comprises members from B2Holding's business lines, human resources, risk, compliance, and finance. The CSIC ensures that the Group's ESG strategy is anchored and implemented throughout the organisation. Furthermore, all Group entities have an appointed local sustainability ambassador to support and lead local initiatives, in addition to harmonizing with Group initiatives.

In 2021, B2Holding developed and implemented its Sustainability Policy which has been approved by the Board. The policy sets out B2Holding's standards for how it intends to work with sustainability and how it expects its employees and representatives to conduct themselves. The policy will be reviewed periodically to ensure that B2Holding is doing its best in this area.

B2Holding has several policies governing how the Group works with sustainability issues:

- Sustainability Policy
- Environment and Sustainability Procurement Statement
- Labour and Human Rights Statement
- Responsible marketing and sales Statement
- Supplier Diversity Statement
- Political and Religious involvement Statement
- Business Partner Code of Conduct
- Related Party Transaction Policy
- Health and Safety Statement
- Customer Fair Treatment Policy
- Code of Conduct
- Compliance Policy
- Whistleblower Policy
- Anti-Corruption Policy
- Anti-Money Laundering, Counter Terrorist Financing and Sanction Policy
- GDPR Policy
- Instructions for Handling Inside and Confidential Information

- Investment Approval Policy
- Group Transaction Team memo - Covid-19 and contractual impact
- Tax Policy
- Transfer Pricing Policy
- Information Security Policy

ADAPTATION TO ESG DEMANDS

B2Holding is increasingly experiencing requests for ESG related information and disclosures from its stakeholders. During 2021, the Group has focused on adopting relevant ESG standards, integrating processes and routines, and developing a strategic direction for the Company, as well as identifying and improving its performance against different ESG ratings.

The new GRI standard was published late 2021. In line with the Group's transparency commitment it has made an effort to report and disclose performance based on the new standard that will be mandatory with effect from 2023.

TCFD | TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

ESG 100

How the largest 100 companies on the Oslo Stock Exchange report on ESG



Preparing for the EU Taxonomy Regulation

B2Holding is closely monitoring the EU’s work on Sustainable Finance. The new legislative and non-legislative actions introduced in the European Green Deal and the EU Sustainable Finance Action Plan will require financial market participants and companies to consider and disclose how they are working with sustainability in a new and standardized manner.

The EU Taxonomy, a cornerstone of this work, establishes a classification system with criteria for which economic activities can be considered environmentally sustainable. Large companies will be required to disclose to what extent their turnover, investments and operational costs align with the EU Taxonomy criteria. Going forward, B2Holding plans to analyse and disclose how the Group’s operations align with the EU Taxonomy. B2Holding will also assess how the framework can be used for internal risk management, financial planning, and strategy processes.

Materiality Assessment

In 2021, B2Holding updated its materiality assessment to align with the new GRI standards. The assessment was carried out through interviews with external and internal stakeholders, with the help of an independent third party.

Following the review, the following topics emerged as material for B2Holding:

- Fair treatment and satisfaction of customers
- Cybersecurity and data privacy
- Ethical behaviour and anti-corruption
- Training and development
- Responsible acquisition of portfolio and partnerships
- Human rights
- Diversity and inclusion
- Employee health and wellbeing
- Climate change

Over 2021, B2Holding has performed different stakeholder meetings as included in annex 4, stakeholder engagement on page 58.

ESG STRATEGY

To support the sustainability ambitions, B2Holding developed an ESG strategy in 2021. The strategy guides the Group’s ESG work and includes measurable targets that allow tracking goal achievements. The goals were developed to align with the SDGs in the areas where B2Holding can have meaningful and sustainable impact.

The strategy is divided into four strategic lines, which represent B2Holding’s ESG priorities. These are:



All strategic lines has their own set of goals and targets and are linked to B2Holding’s material topics. The Group will track and report on its progress in reaching the targets. The current strategy will run until 2023, at which point B2Holding will assess its implementation and develop a new strategy.

**LINE OF ACTION:
SATISFACTION AND IMPROVEMENT OF
THE KNOWLEDGE ABOUT THE CUSTOMERS**

The strategic line seeks to maintain a culture where B2Holding ensures the fair treatment and satisfaction of customers. To achieve this, the following goals and targets have been set:

Material topic	Goals	Targets
Fair treatment and satisfaction of customers (debtors)	Improve debtor satisfaction	Develop and implement debtor survey, establish baseline and develop targets for improvement (9 countries)
	Improve efficiency in the collection process and ensure good quality standards	Increase ratio of debtors reintroduced to the financial chain by 50 %

**LINE OF ACTION:
RESPONSIBILITY IN THE VALUE CHAIN**

The strategic line includes the responsible acquisition of portfolios and partnerships, as well as human rights and has set the following goal and targets:

Material topic	Goals	Targets
Responsible acquisition of portfolios and partnerships	Integrate ESG criteria throughout the value chain	ESG requirements applied in 100 % of portfolio acquisitions
Human rights	Carry out effective human rights due diligence	Identify salient human rights issues
		Create communication channels with impacted people

**LINE OF ACTION:
ATTRACTIVE AND SUSTAINABLE
WORK ENVIRONMENT**

The strategic line includes diversity and inclusion, training and development and a safe and sustainable work environment and includes the following goals and targets:

Material topic	Goals	Targets
Diversity and inclusion	Increase diversity and equal opportunities within the company	Increase female representation in C-1 by 2 % in local entities
		Zero gender pay gap in all employment categories by 2025
Training and development	Foster talent development among employees	100 % of employees receiving performance and career development reviews at least once a year
		Annual hours of training per employee rate at 20 hrs/employee
Safe and sustainable work environment	Reduce environmental impact	Reduce total GHG emissions in line with SBTi
	Increase employee satisfaction and wellbeing	Maintain level of employee engagement at score level between 80-100
		Decrease voluntary turnover by 23 %

**LINE OF ACTION:
TRANSPARENT AND CREDIBLE
MANAGEMENT OF ESG**

The strategic line includes ethical behaviour and anti-corruption, risk and resilience, corporate governance, adaptation to ESG demands, credibility and transparency, and cyber-security and data privacy, and includes the following goals and targets:

Material topic	Goals	Targets
Ethical behaviour and anti-corruption	Strengthen legal compliance in all operations	Zero corruption Annual compliance training for all employees
Risk and resilience	Strengthen management of ESG risks	Maintain negligible risk rating for Sustainalytics on the ESG risk rating scale ranging from negligible risk (0-10) to severe risk (40+)
Corporate governance	Strengthen management and governance of ESG issues	Develop and implement group wide ESG related policies: ESG policy, human rights policy, environmental policy, diversity policy, responsible supplier policy, responsible acquisition policy
Adaptation to ESG demands	Integration of ESG standards throughout operations	Train 100 % employees on ESG topics
Credibility and transparency	Increase transparency and credibility of ESG	Implement ESG software reporting tool
Cybersecurity and data privacy	Strengthen cybersecurity and data privacy	Annual audit on data privacy and cybersecurity

ESG Performance

ESG in numbers

74

Percentage of portfolio acquisitions where ESG requirements have been applied

100

Percentage of employees with training in whistleblowing, Code of Conduct and GDPR

80

of 100 on employee engagement index

9.3

Sustainalytics rating (negligible risk 0-10)

0

Incidents of corruption

0

Security breaches

67

Percentage of women in the workforce (head count)

SOCIAL

SATISFACTION AND IMPROVEMENT OF THE KNOWLEDGE ABOUT CUSTOMERS

Fair treatment and satisfaction of customers

Fair treatment of B2Holding's customers (debtors) is at the very core of its business model. The customer is responsible for any delays in payment, however the consequences shall not be unreasonable. It is B2Holding's responsibility to ensure that the collection process does not cause unreasonable outcomes. Additionally, B2Holding often engages with people in vulnerable situations and considers it a responsibility to treat customers with understanding, respect and dignity. During 2021, the Group has continued the implemented Covid-19 pandemic measures and dedicated resources across the Group to help those in vulnerable situations. The business units have adapted their collection strategies, offering payment solutions to accommodate vulnerable groups and those especially affected by the pandemic.

These commitments guide B2Holding's behaviour and are stated in its Code of Conduct, as well as in its values. The Head of Operations within each business unit is responsible to ensure that operations are in line with Group policies, guidelines and standards, whilst the final responsibility lies with the Head of Unsecured Asset Management and the Head of Secured Asset Management who are responsible for the respective business lines and with members of the Group Executive Management (the Management).

B2Holding's principal mean to ensure good outcomes for all parties, including satisfaction of customers, is to find amicable solutions whenever possible. Through amicable solutions, the Group considers the customer's current financial situation whilst collecting repayments within a reasonable timeframe.

The main goal of B2Holding's services is to help the customers solve their indebtedness situation by paying their debts. The Company has different payment solutions and plans in place and can measure the impact on the health and safety of the services it provides. In 2021, the Group measured this information and found that 5.7 % of total customer claims were fully repaid (debt free). It is the Group's intention to get further details in 2022 by measuring not only fully repaid debt but also those customers who are reducing their debt balance with partial payments or payment plans.

B2Holding has established monthly internal Quality and Auditing Controls in 50 % of its entities (11 out of 22 entities), where it reviews calls and other actions performed for customers in order to assess how it is implementing its commitments. Of all audited calls and actions in 2021, 89 % comply with B2Holding's standards.

B2Holding continues to roll out customer surveys to collect feedback on its services. In 2021, 14 % of the Group's operations had implemented and carried out such surveys. Of the customers surveyed, an average of 83 % were satisfied with the services.

Complaints received in 2021 from customers concerning rights, disagreements, or non-conformity represented 0.17 % of cases during the reporting period. Complaints are handled on a daily basis by following the collection guidelines in the respective local entity.

KPI	2021	2020
% of claims fully repaid (debt free)	5.7 %	N/A
Quality and Auditing Controls ¹⁾	89 %	98 %
Customer satisfaction survey ²⁾	83 %	98 %

1) In 2020, 45 % of the Group's operations were covered by a Quality and Auditing Controls system. This figure increased to 50 % in 2021.

2) In 2020, 10 % of the Group's business units performed customer satisfaction surveys. This figure increased to 14 % in 2021. In the beginning of 2022, it has been implemented in two additional countries with the goal to implement in the majority of B2Holding's entities during 2022.

ATTRACTIVE AND SUSTAINABLE WORK ENVIRONMENT

Employee health and wellbeing

B2Holdings considers the health and wellbeing of its employees to be essential in delivering high quality services, as well as to attract and retain talent. Sick leave is generally high in the industry and this is an issue the Group is striving to tackle. The high absence rate can partly be explained by the nature of call centres, which can be a monotonous yet stressful work environment with pressure in both quality and quantity of calls. Therefore, B2Holding approved its Health and Safety Statement in 2021, which outlines B2Holding's commitment to treat the wellbeing and health of the Group's employees as a priority. This includes fostering and promoting a health and safety culture among all employees, providing an appropriate and safe working environment to employees and visitors, encouraging training on health and safety issues, and conducting systematic reviews to ensure that health and safety policies are being implemented correctly.

In order to fully understand how the wellbeing of the employees can be improved, the Group annually conducts a Group-wide engagement survey. The survey monitors engagement levels by giving the employees an opportunity to

share their opinions anonymously. The aim of the survey is to identify areas for improvements within the organisation, and the managers use the results to discuss improvement areas with their teams and to develop action plans together.

B2Holding considers work-life balance to be important and the Group is always striving to improve its performance in this area. Although only 43 % of the Group's entities have work-life balance measures in place, all entities have different measures accessible to employees that support work-life balance to some extent, such as flexible working hours and work-from-home policies.

KPI	2021	2020
Share of business units with a work-life balance plan in place	43 %	27 %
Professional sick leave ratio ³⁾ (excluding parental leave)	0.03	5.30
Accident frequency rate ⁴⁾	0.45	0.30
Employee satisfaction (Engagement index)	80/100	80/100
Turnover rate	23 %	35 %
Voluntary turnover rate	16 %	13 %

3) Professional sick leave ratio calculated as total number of days lost of employees due to an in-work accident with sick leave and professional illness over the time period/total number of annual working hours x 1,000.

4) Accident frequency rate calculated as total number of accidents at work with sick leave over the time period/total number of annual working hours x 200,000

Diversity and inclusion

B2Holding believes that a diverse workforce contributes a wider range of ideas and initiatives, driving innovation and enhanced performance. The Group aims for its employee composition to reflect the wider society. B2Holding believes that combining different competencies and perspectives results in better quality of debt collection services, both for clients and customers.

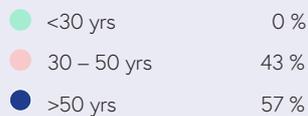
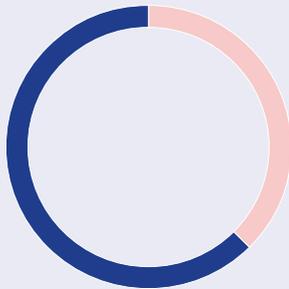
B2Holding seeks to ensure equal opportunities to all individuals, regardless of gender, ethnicity, or age. The company emphasises the need to ensure gender diversity, particularly in top management positions, as well as to properly disclose any existing pay gap. If pay gaps are revealed, great efforts shall be dedicated to reducing any such difference. In 2021, the Group performed an analysis of pay gap showing an overall 6.6 % pay gap in favour of male employees. This analysis can also

provide a more detailed segmentation regarding functions and location and will be followed up by implementing changes the coming years in areas necessary.

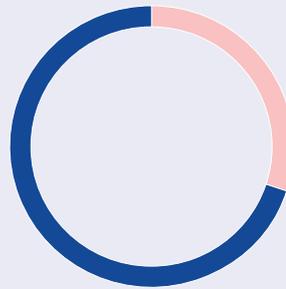
KPI	2021	2020
Share of women in management (C-0 and C-1 level)	46 %	49 %
Share of women in the workforce (head count)	67 %	65 %
Number of nationalities in the workforce	45	42
Share of Business Units with diversity and inclusion policy in place	38 %	21 %



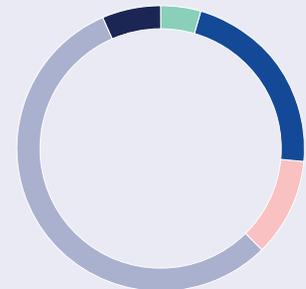
Board members by age group



Group Management by age group



Origin of employees



Training and development

B2Holding seeks to treat its clients and customers with trust and respect, as well as to provide sound financial advice to each customer based on their individual situation. To do this well, B2Holding's employees must be highly competent and B2Holding considers employee training and development to be essential to its mission. Furthermore, facilitating and enabling professional growth is important to retain talent within the organisation.

To support the Group's commitment in this area, a digital learning management platform was launched in March 2021, containing a combination of voluntary and mandatory content. In 2021, 100 % of employees participated in different trainings using either internal or external digital learning platforms, and each employee underwent an average of ten hours of training. Over the course of the year, all employees participated in mandatory trainings on Whistleblowing, Code of Conduct and GDPR. In 2022 the Group will disclose information related to training distribution per gender and function category. In addition, the Group plans to implement ESG training for all employees to ensure that the management of sustainability is integrated throughout the organisation.

In 2021, four Group entities (19 % of geographies) had talent development programs in place, and 29 employees were a part of a talent development program. The Group's ambition is to expand such initiatives to all entities and give employees the opportunity to reach their true potential.

KPI	2021	2020
Business Units with talent programs in place	19 %	10 %
Business Units with e-learning platform	100 %	27 %
Employees receiving e-learning training	100 %	32 %

GOVERNANCE

For B2Holding, good corporate governance means setting high ethical standards and is key to identifying and managing risks, as well as to visualize, plan, and fulfil the goals of the Company. The implementation of good corporate governance practices also contributes to the efficiency of processes, reduction of costs and access to financing. Moreover, good governance fosters an ethical and responsible organisational climate, which increases the Company's ability to attract and retain employees, maintain team commitment, and ensure a positive perception.

Good governance is a key element to promote ethical behaviour at B2Holding, which is essential to gain the trust of our stakeholders.

TRANSPARENT AND EFFECTIVE MANAGEMENT OF ESG

B2Holding's Code of Conduct was reviewed, updated, and approved by the Board in 2020. It is communicated to the Group's employees and business partners during the onboarding process. The Code of Conduct is accessible on B2Holding's website, as well as through its internal communication platforms. It has been translated into local languages and is essential to ensure that a common culture takes hold within the organisation. To support the implementation across the organisation, various workshops and mandatory training sessions were conducted during 2021.

Ethical behaviour and anti-corruption

Corruption represents a risk to B2Holding's operations due to the high number of transactions passing through its organisation daily. Additionally, the Group has a presence in some countries and markets with higher exposure to financial crime, which requires extra vigilance when operating in these countries.

B2Holding's presence in different locations are ranked according to Transparency International Corruption Perception Index as shown in the table on this side.

B2Holding has a zero-tolerance policy against corruption, including the abuse of entrusted power, illegitimate personal benefits, or private gain. Employees are not permitted to receive gifts or personal benefits in any form from other stakeholders, as this may cause their decision-making to be based on other factors than sound financial principles.

This commitment is outlined in B2Holding's Code of Conduct and applies to employees, suppliers, vendors and business partners. Furthermore, the Group's Anti-Corruption Policy is rooted in the Code of Conduct, and outlines what is meant by corruption, the related risks, and how employees should respond, as well as the responsibilities and

TRANSPARENCY INTERNATIONAL CORRUPTION PERCEPTION INDEX

Country	2021 Rank	Score
Finland	1	88
Denmark	1	88
Norway	4	85
Sweden	4	85
Luxembourg	9	81
Estonia	13	74
France	22	71
Lithuania	34	61
Spain	34	61
Latvia	36	59
Slovenia	41	57
Italy	42	56
Poland	42	56
Czech Republic	49	54
Cyprus	52	53
Greece	58	49
Croatia	63	47
Montenegro	64	46
Rumania	66	45
Hungary	73	43
Bulgaria	78	42
Serbia	96	38
Bosnia	110	35

consequences when corruption is detected. An updated version of the Group Anti-Corruption Policy is currently being prepared and will be finalised in the beginning of 2022.

B2Holding's exposure to corruption risk is assessed to be largely related to the acquisition of debt portfolios when these are not sold through regulated channels. Such sales are guided by the authorisation hierarchy, which is set out in the Corporate and Secured Asset Management Resolution Policy. The policy seeks to ensure appropriate delegation of authorities between the various levels of decision making.

The responsibility for identification, management, and remediation of non-ethical and/or corruption risks are divided as follows:

- Business Operations own and manage risks (the first function),
- The Compliance and Risk Management functions support the implementation of risk and compliance management procedures, as well as measuring, monitoring, following up and reporting any risks (the second function), and
- The Internal Auditor independently evaluates the governance, risk management and control processes within the first and second reporting functions (the third function).
- Ultimate responsibility lies with the Board.

An essential aspect for responsible business conduct is the implementation of a whistleblowing channel, and in 2021 B2Holding launched a whistleblowing channel covering all business units. The internal whistleblowing channel, which has been set up in collaboration with an external service provider, ensures confidentiality and anonymous reporting. B2Holding encourages its employees to use the Whistleblowing channel to report misconduct, violations and/or breaches (irregularities) which are deemed to be "protected disclosures". Whistleblowing Functions have been appointed locally and at the Group level and trained in order to handle Whistleblowing reports and conduct investigations. When necessary, corrective and remedial measures are implemented. To ensure individuals are comfortable reporting concerns, B2Holding prohibits any form of retaliation against good faith reports. Once the investigation has been duly completed, a final report is drafted, outlining the main conclusions and recommendations. Once the report is done, this is received by the corresponding body (i.e. Local management, local supervisory team or Group management if appropriate) to decide on the measures to put in place following recommendations. The channel is currently only available for employees, although the Group intends to expand its reach in due course.

To ensure the purpose of the whistleblowing mechanism was understood, a mandatory course was provided to the entire organisation together with the launch. Further,

B2Holding ensures compliance with the principles, rules and processes foreseen in the EU Whistleblowing Directive by implementing the Group Whistleblowing Policy to guide the operation of the whistleblowing mechanism. The steps of the process, from the receipt and registration of the whistleblowing report to the decision of Management, are described in the Policy.

The whistleblowing channel was launched towards the end of 2021, therefore the number of reported cases does not reflect the full year. In 2020, the information disclosed as "incidents reported as whistleblowing channel" where incidents reported to local entities that had a local channel in place at the time.

In 2021, the Compliance function implemented and deployed mandatory training, which was conducted by the whole organisation. Over the year compliance reporting has also been fully implemented via the Group reporting platform. Reporting takes place on a quarterly basis to follow up performance as well as to review incidents, management processes and implement necessary corrective measures. The central Compliance function has met with all entities to set up and train for the Annual Compliance Program (ACP), and for 2022, meetings have been set up with all business units. To help the local Compliance functions plan for compliance and GDPR activities for 2022, the ACP also aims at reviewing the status of measures and activities completed in 2021. As such, the function of the ACP is two-fold: review what has been done the previous year and assist in the planning of activities for the coming year.

KPI	2021	2020
Incidents reported as whistleblowing channel	10	11
Incidents reported as discrimination or harassment	1	11
Confirmed incidents of corruption	0	0

Risk and resilience

The Covid-19 pandemic has caused more awareness about the resilience of companies. For B2Holding it is essential to have prevention plans and robust risk management systems in place to identify, evaluate and manage the potential risks that might impact the Company's activities and performance, including ESG issues.

Stakeholder engagement and transparency

B2Holding considers transparency and accessibility crucial for growth and it is essential for B2Holding to ensure good internal and external communication based on corporate

values. As a publicly listed company, stakeholders are provided with access to information regarding regulatory compliance including financial and non-financial information.

During 2021, B2Holding has performed 12 meetings with different stakeholders with different goals. As shown in annex 4, Stakeholder engagement, on page 58 the Company and stakeholders have reviewed expectations and concerns in order to update and manage any potential issues. Some performance achievements have also been reviewed and updated.

Cybersecurity and data privacy

In the current digital world, globalization and data sharing have triggered an increase in cyberattacks and data breaches. Data privacy is of the utmost importance for the millions of individuals affected by B2Holding's business. Consequently, data privacy is a major concern for the Group Executive Management.

B2Holding prioritises developing and implementing prevention plans to avoid cyberattacks and data breaches, and to secure the Company's information. As online services and digitalisation are part of B2Holding's business model, the Group is firmly committed to developing the necessary cybersecurity tools to tackle the associated risks. Confidentiality, integrity, and availability are respected during the whole data processing cycle: collection, processing, storage, and erasure with the aim of protecting customers' personal data.

B2Holding's policies and prevention plans are revised and updated regularly to appropriately handle customer privacy and personal data processing. Cybersecurity and data privacy are governed through the following policy documents:

- GDPR Policy
- Personal Data Breach Management Policy
- Cookie Files Policy
- Risk Analysis Policy
- Information Security Policy

B2Holding has an external Group Data Protection Officer (DPO) and all Group entities use dedicated DPOs where required. The Group entities have IT software to ensure compliance with GDPR requirements, and Data Protection training is provided to current employees as part of the regular training programs and to new employees as part of the onboarding process. The training is mandatory and is conducted on an annual basis.

KPI	2021	2020
Security and data privacy breaches	0	0

RESPONSIBILITY IN THE VALUE CHAIN

Responsible acquisition of portfolios and partnerships

B2Holding works with different organisations, such as vendors or co-investors, to acquire non-performing loans, where the aim is to establish mutual trust agreements without incurring any unwanted risks. B2Holding's acquisition of non-performing loans and third-party debt collection services have important ESG implications. These are related to, but are not limited to, corruption, treatment of debtors, commercial strategies, certain reputational activities, anti-competitive practices, and legal sanctions.

In September 2021, a Responsible Marketing and Sales Statement was approved by the Head of Corporate Development. The statement provides guidelines to manage marketing and sales activities in an ethical and responsible manner, ensuring that business units do not partner with non-compliant business partners. Further, it provides guidelines on developing a well-defined marketing and sales process in compliance with all applicable laws, as well as to avoid and minimise claims, risk of fraud, or incorrect invoicing that could have a negative impact to B2Holding's business relationships, brand name and reputation. In relation to portfolio investments, B2Holding has developed a unique principle in its portfolio acquisitions to not partner with any business partner that has certain defined characteristics that present a high ESG risk. Such characteristics include the use of unfair pricing practices, the use of lending terms that can be regarded as offensive, abusive, or that deviate from market rates, or pursuing aggressive sales or lending methods which can be considered unfair. In addition, entities that offer consumer loans with a short duration against a high interest rate shall normally not be accepted as business partners, and when they are accepted, shall be subject to increased caution in the due diligence process. During 2021, at least 74 % of total acquisitions used these ESG criteria.

Human rights

B2Holding is committed to ensuring respect for the inherent dignity of people and their inalienable rights as a fundamental part of its corporate responsibility, and as an essential requirement for conducting its business activities in any country or social environment. For this reason, B2Holding is committed to the UN Guiding Principles on Business and Human Rights (UNGPs). The Group views human rights as those rights recognised by the International Bill of Rights and the Core Conventions of the International Labour Organisation.

The recent year, B2Holding has worked to strengthen its commitment to human rights and has developed its Labour and Human Rights Statement, approved by the Head of Corporate Development, to anchor its work. B2Holding's Code of Conduct supports these fundamental principles

and is the Group's foundation for building and sustaining professional and long-term relations with its stakeholders and maintaining high ethical standards in every decision made.

The Labour and Human Rights Statement of the Group covers UN Global Compact's Ten Principles, the UNGPs' "Protect, Respect and Remedy Framework", and International Labour Organization Conventions 87, 98 and 111. The Labour and Human Rights Statement is to be read in conjunction with B2Holding's Sustainability Policy and outlines the labour and human rights recognised by B2Holding to its employees irrespective of their role and the country in which they work, to its customers, and to the local communities where the Group operates.

The Group is taking additional measures to ensure compliance with the new Norwegian Transparency Law which comes into force in July 2022. This law requires companies to carry out human rights' due diligence in line with the OECD Guidelines for Multinational Enterprises. In addition, companies must report on the actions taken to mitigate adverse human rights impacts and their effectiveness, as well as to respond to requests for information from the public.

As a first step to comply with the law, B2Holding has partnered with an external independent third party to identify its salient human rights issues. These are:

- Vulnerable people
- Privacy and data protection
- Stakeholder engagement
- Labour rights
- Access to Remedy

B2Holding will review its salient issues on a regular basis as it works with and improves its performance on these issues.

ENVIRONMENT

CLIMATE CHANGE

Climate impacts

In September 2021, the Group approved The Environmental and Sustainable Procurement Statement that outlines how B2Holding expects employees and business units to act and perform their activity in a sustainable manner to reduce the Group's environmental impact, and how the Group integrates environmental considerations in its procurement processes. The statement sets out the strategic framework and model for the Group's various initiatives with regards to environmental management.

The share of business units with an energy consumption plan or a policy developed and implemented has increased from 14 % in 2020 to 17 % in 2021. In December 2021,

B2Holding committed to develop science-based emissions reduction targets in line with the Science-Based Target initiative criteria.

An important target for 2021 has been to provide a climate accounting for all Group entities. The climate accounting in the table is presented according to the GHG protocol⁵⁾ and includes all subsidiaries where B2Holding holds financial control⁶⁾. As part of the Group strategy to reduce CO₂ emissions, the business unit in Italy purchased guarantees of origin for its entire electricity consumption in 2021.

Scope	Definition	Tonnes of CO ₂ equivalents (2021)
1	All direct Greenhouse Gas (GHG) emissions from sources that are owned or controlled by the reporting entity.	427.98
2	Indirect GHG emissions from consumption of purchased electricity (location-based), district heating and cooling.	538.01
2	Indirect GHG emissions from consumption of purchased electricity (market-based), district heating and cooling.	691.35
3	Other indirect emissions, including business travel (flights) and car allowance.	1218.14

Calculations above are based on conversion factors from DEFRA, AIB, the Norwegian Environment Agency and the Norwegian District Heating Association.

- 5) Defra emission factors for fuels and air travel have been applied for scope 1 and 2 calculations. AIB's European residual mix and production mix have been applied for scope 2 calculations. For district heating, the European average according to the IEA has been applied for Croatia, France, Italy, Latvia, Lithuania, Romania and Slovenia. For Sweden, Energiföretagen's emission factor has been applied. For Norway, an estimation has been made based on numbers from Norsk Fjernvarmeforening. Emissions from car allowances has been calculated according to SSB estimation of CO₂ per passenger.km.
- 6) Luxembourg, Ultimo Portfolio, are excluded from the Scope 2 emissions. Czech Republic, B2 Kapital Czech Republic s.r.o., electricity data is based on 2020 numbers. Both Bosnia and Herzegovina, B2 Kapital d.o.o., and Montenegro, B2 Kapital d.o.o., are excluded from Scope 1,2 and 3 calculations.

Climate risks

In January 2022, B2Holding conducted a climate risk review according to the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations. The review found that there are some associated indirect climate-related risks

in the Group's secured debt portfolio, however, these risks are considered low and are partly mitigated through its operations.

Findings and recommendations based on the TCFD framework:

	Findings	Recommendations
Governance	<ul style="list-style-type: none"> The Board is presented with certain climate related risks, however, no frequent or comprehensive overview of risks provided. Board oversight should include external climate related risks and financial consequences. 	<ul style="list-style-type: none"> Board to be briefed on climate risk alongside, and on the same basis, as other business risks.
Strategy	<ul style="list-style-type: none"> No strategy or approach on how to mitigate and adapt to climate change, as risks identified are considered short-term and low risk. 	<ul style="list-style-type: none"> Develop strategy to systematic map and assess implication of climate risks and opportunities. Develop strategy to anticipate climate change-related public policies and market developments. Ensure that strategy includes financial planning for adaptation and business opportunities i.e. capitalising on opportunities.
Risk management	<ul style="list-style-type: none"> Risks are flagged top-down, however, there are no systematic review of B2Holdings total portfolio exposure to climate risk. Climate risks are not systematically integrated into B2Holding's overall risk management. 	<ul style="list-style-type: none"> Integrate climate risk into ERM systems across the organisation. Establish a streamlined process for assessing and managing high impact risks at management level.
Metrics and targets	<ul style="list-style-type: none"> B2Holding are disclosing Scope 1, 2 and 3 emissions figures on an annual basis. However, reporting does not cover the entire organisation. B2Holding is committed to develop science-based emission reduction targets in line with Science-Based Targets Initiative (SBTi) criteria 	<ul style="list-style-type: none"> Calculate complete Scope 1, 2 and 3 emissions for the entire company Identify where the largest emissions impacts are, and aim for a higher data quality for these emissions

Additionally, the review identified relevant gaps in B2Holding's management approach, and the Group aims to implement monitoring of climate-related risks in its risk

management systems. B2Holding will continue to assess climate-related risks and opportunities on a frequent basis to further improve its resilience.

Sustainability report annexes

ANNEX 1: GRI INDEX

Statement of use: B2Holding has reported in accordance with the GRI Standards for the period 01.01.2021 to 31.12.2021

GRI 1 used: GRI 1: Foundation 2021

GRI Standard	Disclosure	Location
GRI 2: General Disclosures 2021	2-1 Organizational details	www.b2holding.no/About , www.b2holding.no/About/Markets
	2-2 Entities included in the organization's sustainability reporting	This is B2Holding, page 4-5
	2-3 Reporting period, frequency and contact point	Annual reporting for the reporting period: 01.01.2021 to 31.12.2021 Published: April 2022 Contact point: María Haddad Sanchez de Cueto at mah@b2holding.no
	2-4 Restatements of information	None
	2-5 External assurance	The Board of Directors reviews and approves the Sustainability Report. It is the Company's intention to get external assurance in the future.
	2-6 Activities, value chain and other business relationships	This is B2Holding, page 4-5

GRI Standard	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-7 Employees	Annex 2: General disclosures on employees, page 54	b) Report the total number of: i. permanent employees, and breakdown by gender and by region, ii. Temporary employees, and breakdown by gender and region, iv. Full-time and part-time employees, and breakdown by gender and by region	Information unavailable	B2Holding will seek to report on this in 2022.
	2-8 Workers who are not employees	At the end of 2021, B2Holding had 97 workers (head count) who are not employees and whose work is controlled by the organisation. These were mainly phone agents and temporary workers from external recruitment agencies.			
	2-9 Governance structure and composition	Corporate governance report, page 60 The are no employee representation in the Board			
	2-10 Nomination and selection of the highest governance body	Corporate governance report, page 64			
	2-11 Chair of the highest governance body	The chair of the Board is not a senior executive in B2Holding.			
	2-12 Role of the highest governance body in overseeing the management of impacts	ESG management, page 30			
	2-13 Delegation of responsibility for managing impacts	ESG management, page 30			

GRI Standard	Disclosure	Location
	2-14 Role of the highest governance body in sustainability reporting	The ESG strategy plan, as well as materiality review. ESG strategy goals are presented to the Board and approved by them.
	2-15 Conflicts of interest	www.b2holding.no/About/Code-of-Conduct
	2-16 Communication of critical concerns	Annual review and risk management. The Management reported issues related to operation, collection/recovery issues, organisation, risk factors, sustainability issues, liquidity issues, financial performance, status of projects, governance issues, compliance issues, investments with purchase price exceeding EUR 20 mill, effects on the pandemic - No issues with a risk described as critical.
	2-17 Collective knowledge of the highest governance body	B2Holding has introduced quarterly updates in any legislation change affecting the company on ESG and strategy implementation.
	2-18 Evaluation of the performance of the highest governance body	Sustainability report, page 30-32
	2-19 Remuneration policies	Instructions for the Remuneration Committee (b2holding.no)
GRI 2: General Disclosures 2021	2-20 Process to determine remuneration	Instructions for the Remuneration Committee (b2holding.no)
	2-21 Annual total compensation ratio	Average gross annual base pay of local entity CEOs are 3.96 times the average gross annual base pay for B2Holding in total. The Compensation & Benefits study conducted in 2021 showcase only a snapshot based on information reported at that specific time. B2Holding does not have an historical overview of these numbers.
	2-22 Statement on sustainable development strategy	Sustainability CEO statement, page 27
	2-24 Embedding policy commitments	Sustainability report, page 30-31 and 40-41
	2-25 Processes to remediate negative impacts	B2Holding has in 2021 developed a significant number of policies and statements that are related to sustainability topics. Over 2022, processes to remedy any negative impact will be developed.
	2-26 Mechanisms for seeking advice and raising concerns	Transparent and effective management of ESG, page 40
	2-27 Compliance with laws and regulations	B2Holding has not received any fines, nor sanctions of instances of non-compliance with laws and regulations

GRI Standard	Disclosure	Location
GRI 2: General Disclosures 2021	2-28 Membership associations	Annex 3: Membership Associations, page 57
	2-29 Approach to stakeholder engagement	Transparent and effective management of ESG, page 40 ESG management, page 30 Annex 4: Stakeholder engagement, page 58
	2-30 Collective bargaining agreements	31.4 % of B2Holding's employees are covered by a collective bargaining agreement (CBA). Employees with no CBA are all covered by local labour laws and regulations. The reasons for not being included in a CBA are that it does not exist in the country, it is not compulsory or the company is not large enough to be in a CBA.
GRI 3: Material Topics 2021	3-1 Process to determine material topics	ESG management, page 30 Transparent and effective management of ESG, page 40 B2Holding revised its materiality assessment in 2021 with an external third party. B2Holding identified its potential and actual impacts, and assessed the significance of these. The findings were calibrated and validated in a workshop to conclude on a list of material topics.
	3-2 List of material topics	ESG management, page 30
Fair treatment and satisfaction of debtors		
GRI 3: Material Topics 2021	3-3 Management of material topics	Fair treatment and satisfaction of debtors, page 37
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Fair treatment and satisfaction of debtors, page 37
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	B2Holding had 4,743 of incidents of non-compliance with voluntary codes concerning the health and safety impacts of products and services (internal quality standards). The nature of non-compliance with voluntary codes are those related to internal collection guidelines that do not reach the quality of negotiations and/or solutions provided to customers.
Cybersecurity and data privacy		
GRI 3: Material Topics 2021	3-3 Management of material topics	Cybersecurity and data privacy, page 42
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	The Company has not received any substantiated complaints as defined above in the reporting period regarding breaches of customer privacy and loss of customer data

GRI Standard	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Ethical behaviour and anti-corruption					
GRI 3: Material Topics 2021	3-3 Management of material topics	Transparent and effective management of ESG, page 40			
	205-1 Operations assessed for risks related to corruption	Transparent and effective management of ESG, page 40	The total number and percentage of operations assessed for risks related to corruption	Information unavailable	B2Holding will seek to report on this in 2022.
	205-2 Communication and training about anti-corruption policies and procedures	Transparent and effective management of ESG, page 40 All employees (100 %) have received the organisation's anti-corruption policies (Code of Conduct) and procedures and training. 205-2 b) & e) Annex 2: General disclosures on employees, page 54	a. Total number and percentage of governance body members that the organisation's anti-corruption policies and procedures have been communicated to, broken down by region. c. Total number and percentage of business partners that the organisation's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organisation's anti-corruption policies and procedures have been communicated to any other persons or organizations. d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.	Information unavailable	B2Holding will seek to report on this in 2022.
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	Transparent and effective management of ESG, page 40 Zero incidents of corruption in 2021.			

GRI Standard	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Training and development					
GRI 3: Material Topics 2021	3-3 Management of material topics	Attractive and sustainable work environment, page 37			
	404-1 Average hours of training per year per employee	Attractive and sustainable work environment, page 37 On average 10 hrs/employee were performed.	a. Average hours of training that the organization's employees have undertaken during the reporting period by: i. gender ii. employee category	Information unavailable	B2Holding has provided the total number, and will seek to report by gender and employee category in 2022.
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	Attractive and sustainable work environment, page 37			
	404-3 Percentage of employees receiving regular performance and career development reviews	Attractive and sustainable work environment, page 37 A total of 53.2 % of B2Holding's employees received regular performance and career development reviews.	a. Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.	Information unavailable	B2Holding has provided the total number, and will seek to report by gender and employee category in 2022.

GRI Standard	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Responsible acquisition of portfolio and partnerships					
GRI 3: Material Topics 2021	3-3 Management of material topics	Responsibility in the value chain, page 42			
Custom	Significant investment agreements and contracts that include environmental clauses or that underwent environmental screening		<p>a. Total number and percentage of significant investment agreements and contracts that include environmental clauses or that underwent human rights screening.</p> <p>b. The definition used for 'significant investment agreements'.</p>	Information unavailable	B2Holding is planning to include environmental clauses in contracts and carry out environmental screening as part of their acquisition procedures, and report accordingly in 2022.
GRI 412: Human rights assessment 2016	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	<p>Responsible acquisition of portfolios and partnerships, page 42</p> <p>At least 74 % of significant investment agreements underwent or include human rights clauses. It is in relation to the Groups main activity as NPL investor.</p>			
Human rights					
GRI 3: Material Topics 2021	3-3 Management of material topics	Responsibility in the value chain, page 42			
GRI 412: Human rights assessment 2016	412-2 Employee training on human rights policies or procedures		<p>a. Total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.</p> <p>b. Percentage of employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations.</p>	Information unavailable	B2Holding will seek to report on this in 2022.

GRI Standard	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Diversity and inclusion					
GRI 3: Material Topics 2021	3-3 Management of material topics	Attractive and sustainable work environment, page 37			
	405-1 Diversity of governance bodies and employees	Attractive and sustainable work environment, page 37 The board of directors have three women and four men.	b. Percentage of employees per employee category in each of the following diversity categories: ii. Age group: under 30 years old, 30-50 years old, over 50 years old	Information unavailable	B2Holding will seek to report on this in 2022.
GRI 405: Diversity and Equal Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	Attractive and sustainable work environment, page 37	a. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation. b. The definition used for 'significant locations of operation'.	Information unavailable	B2Holding has reported total ratio of basic salary of man and women, and will seek to report for each employee category by significant location of operation in 2022.
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	There were no reported incidents of discrimination reported in 2021.			

			Omission		
GRI Standard	Disclosure	Location	Requirement(s) omitted	Reason	Explanation
Employee health and wellbeing					
GRI 3: Material Topics 2021	3-3 Management of material topics	Attractive and sustainable work environment, page 37			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Annex 2: General disclosures on employees, page 54	<p>a. Rate of new employee hires during the reporting period by region.</p> <p>b. Rate of employee turnover during the reporting period, by age group and gender.</p>	Information unavailable	B2Holding will seek to report rate on hires and turnover by region, age group and gender in 2022.
GRI 403: Occupational Health and Safety 2018	403-6 Promotion of worker health		<p>a. An explanation of how the organization facilitates workers' access to non-occupational medical and health-care services, and the scope of access provided.</p> <p>b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs.</p>	Information unavailable	B2Holding will seek to report on this in 2022.
	403-10 Work-related ill health	<p>i) No fatalities reported as a result of work-related ill health, page 38</p> <p>ii) Nine cases recordable work-related ill health, mainly as "in itinere" accidents on the way to work</p>	<p>b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs.</p>	Confidentiality constraints	The main types of work-related ill health are not reported due to employees' and workers' right to privacy.
Climate change					
GRI 3: Material Topics 2021	3-3 Management of material topics	Climate change, page 43-44			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Climate change, page 43-44			
	305-2 Energy indirect (Scope 2) GHG emissions	Climate change, page 43-44			
	TCFD	Climate change, page 43-44			

ANNEX 2: GENERAL DISCLOSURES ON EMPLOYEES

G2, 2-7

Reporting period: 01.01.2021 – 31.12.2021

By gender and region (head count)

	Female	Male	Total
B2Holding ASA	10	17	27
Bosnia	4	2	6
Bulgaria	139	66	205
Croatia	111	54	165
Cyprus	19	11	30
Czech Rep	1	1	2
Denmark	28	7	35
Estonia	18	5	23
Finland	109	38	147
France	62	26	88
Greece	76	62	138
Hungary	13	3	16
Italy	8	13	21
Latvia	67	34	101
Lithuania	35	4	39
Luxembourg	9	7	16
Montenegro	1	-	1
Norway	3	4	7
Poland	334	181	515
Romania	155	66	221
Serbia	5	4	9
Slovenia	15	3	18
Spain	240	89	329
Sweden	31	40	71
Total	1 493	737	2 230

G205-2 B) & D)

Reporting period: 01.01.2021 – 31.12.2021.

By gender and region

	Employees with anti-corruption policies and procedures communicated			Employees with anti-corruption policies and procedures training		
	Female	Male	Total	Female	Male	Total
B2Holding ASA	10	17	27	10	17	27
Bosnia	4	2	6	4	2	6
Bulgaria	139	66	205	139	66	205
Croatia	111	54	165	111	54	165
Cyprus	19	11	30	19	11	30
Czech Rep	1	1	2	1	1	2
Denmark	28	7	35	28	7	35
Estonia	18	5	23	18	5	23
Finland	109	38	147	109	38	147
France	62	26	88	62	26	88
Greece	76	62	138	76	62	138
Hungary	13	3	16	13	3	16
Italy	8	13	21	8	13	21
Latvia	67	34	101	67	34	101
Lithuania	35	4	39	35	4	39
Luxembourg	9	7	16	9	7	16
Montenegro	1	-	1	1	-	1
Norway	3	4	7	3	4	7
Poland	334	181	515	334	181	515
Romania	155	66	221	155	66	221
Serbia	5	4	9	5	4	9
Slovenia	15	3	18	15	3	18
Spain	240	89	329	240	89	329
Sweden	31	40	71	31	40	71
Total	1 493	737	2 230	1 493	737	2 230

G401-1

Reporting period: 01.01.2021 – 31.12.2021.

By gender, region
and age range

	People entering, female	People entering, male	People entering by age group: <30	People entering by age group: >50	People entering by age group: 30-50	People leaving, female	People leaving, male	People leaving by age group: <30	People leaving by age group: >50	People leaving by age group: 30-50
Bulgaria	27	18	14	0	29	52	20	11	4	57
Croatia	5	3	0	0	8	21	10	11	3	17
Cyprus	19	15	4	12	15	0	1	1	0	0
Czech Rep.	1	0	0	0	0	0	0	0	0	0
Estonia	0	2	2	0	0	1	1	0	0	2
Denmark	1	0	4	0	1	2	6	1	1	2
Finland	15	1	6	2	8	7	7	7	0	7
France	9	10	8	1	10	9	12	3	2	16
Greece	13	21	9	2	23	10	9	1	0	19
Hungary	5	0	3	0	2	13	4	4	4	9
Italy	2	3	0	0	3	4	11	0	1	14
Latvia	117	46	48	15	99	14	3	12	0	5
Lithuania	1	0	0	0	1	3	0	0	1	2
Luxembourg	0	0	0	0	0	2	0	1	0	1
Norway	1	1	0	1	1	1	2	1	1	1
Poland	34	23	27	3	27	50	30	36	5	39
Romania	20	12	16	0	16	24	21	17	0	28
Serbia	0	0	0	0	0	2	1	1	0	2
Slovenia	1	0	0	0	1	6	0	2	0	4
Spain	27	19	14	5	27	47	53	22	19	59
Sweden	12	8	12	0	8	9	6	9	1	6
Total	310	182	167	41	279	277	197	140	42	290

ANNEX 3: MEMBERSHIP ASSOCIATIONS

GRI 2, 2-28

Reporting period: 01.01.2021 – 31.12.2021

1	Bulgarian Receivables Management Association
2	Bulgarian Chamber of Commerce and Industry Investment Council
3	Danish Business Association
4	TCM Group
5	Danish Debt Collection Association
6	EK Confederation of Finnish Industries
7	Service Sector Employers Palta
8	SPL Suomen Perimistöimistöjen liitto
9	Business in Ostrobothnia and JCI Vaasan nuorkauppakamari
10	FIGECI
11	Confederation of Small and Medium-sized Enterprises
12	Hungarian association of debt managers and business information providers
13	Unirec
14	Confcommercio
15	The association of credit and collection professionals (ACA International)
16	Debt collectors' association of Latvia
17	Latvian Chamber of Commerce and Industry (LCCI)
18	Creditreform International
19	The association of Credit Management companies
20	Virke AS
21	B2B Arena
22	The trade association Aalesund
23	Association of Financial Companies in Poland
24	Polish Confederation Lewiatan
25	Association of Commercial Receivables Management ("AMCC")
26	AKUPS
27	Workers Commission - General Union of Workers
28	The West Sweden Chamber of Commerce
29	The Swedish Credit Management Association
30	Swedish Debt Collection Association
31	Data Protection Forum

ANNEX 4: STAKEHOLDER ENGAGEMENT

The table below describes B2Holding's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, as well as key topics and concerns that have been raised and how B2Holding responded.

Stakeholder group	Type of contact and frequency	Key topics and concerns raised	B2Holding's response
Customers (debtors)	<ul style="list-style-type: none"> • Daily contact through website, email, phone, letters, SMS • Debtor survey • Customer service 	<ul style="list-style-type: none"> • Covid-19 crisis financial implications related to employment. 	<ul style="list-style-type: none"> • Protocols and procedures introduced in 2020 that have proved resilient through the pandemic. Special focus on customers in vulnerable circumstances. Fair customer treatment policy approved.
Business partners and financial vendors	<ul style="list-style-type: none"> • Industrial forums • Regular meetings • Valuation processes 	<ul style="list-style-type: none"> • Pandemic implications for defaults. • Regulatory changes and implications for their assets under management. • Post-sale reputational risks. 	<ul style="list-style-type: none"> • Implemented protocols adapting collection strategies to Pandemic. • Increased focus to address partners' and vendors' expectations.
Investors (lenders and shareholders)	<ul style="list-style-type: none"> • Quarterly reporting • Press releases, investor presentations, road shows • Regular meetings 	<ul style="list-style-type: none"> • Share price • Company performance & competitiveness • Capital structure • Market development • Regulatory environment • External credit ratings • ESG management 	<ul style="list-style-type: none"> • Provided trading updates to the investor community with focus on pandemic-related measures during the first wave. • All quarterly presentations and investor presentations were carried out digitally. • ESG increasing demands and expectations addressing Human Rights, as well as target setting and monitoring tools implementation. • Environment and climate initiatives commitment.
Employees	<ul style="list-style-type: none"> • Internal communication platform (Workplace) • HR onboarding programmes • Daily digital or face-to-face interactions • Digital training and feedback sessions 	<ul style="list-style-type: none"> • Work from home policies (WFH) • Pandemic employment uncertainty impacts Health and safety 	<ul style="list-style-type: none"> • WFH policies in place for the longer term with hybrid WFH models. • Ensured employment due to limited pandemic operational impact. • Protocols and measures for flexibility in WFH over different pandemic waves.