



**COLLEN  
CONSTRUCTION  
SUSTAINABILITY REPORT  
REPORTING PERIOD  
April 2022 – March 2023**

## Introduction

This Sustainability report for the financial period commencing 01/04/2022 to 30/03/2023 is published by Collen AB. This report is prepared, considering local Swedish sustainability metrics and criteria, according to the requirements stated within the Swedish Annual Accounts Act. Global practices and reporting standards which were leveraged for the benefit of the Swedish program, were considered.

Based on the requirements within the Swedish Annual Accounts Act, the following subsidiaries are in scope of the statutory requirements:

- Collen AB (org.no. 559116-1061)

We have endeavored to include all necessary and meaningful information applicable to Collen Sweden on a stand-alone basis. Where such information is not available on a stand-alone basis, we have provided information pertaining to the Collen Group.

## Sustainable Business Model

As a global main contractor, we recognize the role we can play in creating a more sustainable and prosperous future for all. Collen is an 8th generation, family-owned business founded in 1810 with a strong reputation for Sustainability has always been a core value for Collen, from sustaining the company for the 8th generation Collen family, to sustaining the environment for all future generations.

Collen's portfolio includes commercial, fit-out, data centres, substations, biopharma, industrial warehousing, retail, residential, healthcare, conservation, and education projects, ranging in value from under €1 million up to €750 million. The company specializes in the delivery of data centres and is recognised as a leader within the data centre build environment with projects in Ireland, Germany, and Sweden.

Collen's dedicated teams work closely with design teams providing a full turn-key service through procurement, installation, and commissioning of all elements of the project including fit-out in order to provide a fully functional project to the client's needs and standards, upon completion. The management team ensures smooth co-ordination of all aspects of the project including mechanical and electrical services.

Collen promotes positive social responsibility and good community relationships in the areas it operates through the generation of local employment, which contributes to inclusive growth, and consideration for inhabitants in close occupation of its operations. For more than 200 years, the Company has built upon strong family values and prides itself in being a responsible Company, balancing Company interests with those of its employees and the wider community.

Our sustainability strategy is intrinsically linked to advancing Environmental, Social and Governance (ESG) best practices in an ethical and efficient manner within our organization and helping our clients to advance their own ESG strategies.

Collen is fully committed to continuing our ESG efforts and leading the shift towards a more sustainable built environment. Collen plays a key role by engaging and educating our subcontractors, suppliers and clients on climate risks and providing ESG-focused solutions that help clients achieve their own ESG objectives. Our corporate sustainability strategy seeks to maximize the impact of our own organization towards our overarching commitment to build greener economies, create more equitable opportunities and contribute to a more sustainable world. For a detailed description of our services please refer to the Annual Reports of Collen AB.

## ESG Materiality Assessment

We are committed to continuously advancing our longer-term ESG strategy, advocacy and oversight. We engage with internal and external stakeholders at all levels on ESG matters on an ongoing basis.

During 2022, we deepened our corporate and community ESG efforts, furthering our commitment to greater sustainability and climate change awareness. We encouraged our employees to participate in our ESG initiatives and engaged with our clients and stakeholders to pursue ESG-related opportunities and accelerate the ESG progress of corporate issuers.

Collen has commenced an ESG materiality assessments<sup>1</sup> to identify and prioritize ESG topics that are influential on our business and important to our stakeholders. At present the topics listed below are Collen's highest priority ESG-related topics:

- Health & Safety Governance
- Diversity, Equity & Inclusion
- Customer Relationship Management
- Decarbonization & Climate Strategy
- Innovation & Technology
- Risk Management
- Board Composition & Governance
- Business Ethics & Integrity
- Transparency & Reporting
- Employee Engagement & Satisfaction

While these 10 areas are critical to our sustainability strategy, targets, and resource allocation, additional ESG topics are important for our reporting to stakeholders, and to Collen's corporate strategy and culture.

# 1. Environmental Climate Change Strategy

Climate change and resource scarcity are challenges to society and to business. As a responsible corporate citizen operating as Main Contractor across the globe, Collen endeavors to lessen our environmental impact and make our operations efficient. We understand the importance of making efforts to reduce our carbon footprint and actively promoting sustainable business operations.

Collen’s climate strategy endeavors to reduce our greenhouse gas (GHG) emissions, mitigate our corporate climate and biodiversity risk exposure and promote awareness throughout our entire value chain. This strategy is driven by our two separates but linked environmental programs:

- Carbon neutrality program: By utilizing our carbon baseline in 2019, KPI’s have been set to reduce carbon emissions, energy use, waste and improve employee education.
- Bio-diversity program: By investing in our Bio-diversity project our current plan focuses to maximize carbon sequestration and storage within the forest portfolio. These measures are crucial in enabling the forest to naturally reduce atmospheric carbon dioxide and effectively store carbon within the forest biomass and soil.

In 2021, Collen commenced our carbon reduction programme, gathering accurate baseline Energy and GHG emissions estimates. This involved a review of all available baseline energy usage data. The key focus was to;

- Gather accurate estimate of group Scope 1,2 and 3 Emissions.
- Support data gathering and provide analysis for setting of GHG targets.
- Provided a reporting template to support reporting and monitoring & Annual Carbon Emissions recording.
- Support a closer alignment between Environmental and Sustainability monitoring and reports

## Collen GHG Inventory

Scope 1	Scope 2	Scope 3
<b>Direct</b> Combustion for heat/steam/power from fuel consumed onsite;  - Natural Gas  Fuels used in company cars  - Diesel / Petrol	<b>Direct -Purchased Electricity</b> Emissions from generation of purchased electricity bought by the company.	<b>Indirect</b> Reporting on emissions from companies actions;  Purchased goods and services Waste generated in operations - Waste Disposal by landfill / Recycling / Incineration  Business travel  Staff commute
<b>Source:</b> Energia Heating bills DCI Fuel bills	<b>Source:</b> Electricity Bills	<b>Source:</b> Invoices for office supplies Waste supplier bills and weights Flight and travel details
<b>Recommendations:</b> Improve heating controls and building insulation Use EV / improve driver and vehicle efficiency /minimise unnecessary journeys	<b>Recommendations:</b> Improve energy awareness and reduce losses Increase PV generation if available	<b>Recommendations:</b> Waste supplier change to zero landfill and increase recycling Staff awareness to reduce waste Explore offset purchases with flights

**Scope 1 – Emissions produced directly from sources owned and controlled by the company.**  
e.g. Combustion (fossil fuels), company vehicles.

**Scope 2 – Emissions produced indirectly from purchased electricity consumed by a company.**

**Scope 3 – Emissions produced by operations not directly owned or controlled by the company**  
e.g. Business travel, Waste Generated, Water consumed.



	Head Office		BASELINE YEAR
	<b>Consumption</b>	<b>tCO2 e</b>	<b>2019</b>
Calcd from tabs	S1	Gas/N Gas	9.3
		Company Car	624.0
	S2	Electricity *Location	56,305.9
		Electricity *Market	-
		Renewable Electricity (avoided)	2.3
	S3	Purchased Goods	
		Tonnes Waste (est)	41
		Business Travel	87
outputs	<b>C02e Footprint</b>	S1 & S3	761
		Scope 1	633
		Scope 3	128
reqd inputs	<b>Metrics</b>	Total kWh Electricity Consumed	149,989
		no. Staff at head office	55
		€mill turnover	200
		tonnes waste	110
outputs	<b>KPI Metrics</b>	tCO2 / tCO2 baseline yr	1.0
		kWh PV/ kWh Total HO	4.0%
		kWh/ staff count	2,727
		tCO2/ €mill turnover	3.8
		tCO2/ no. staff	13.8

Correspondence with Collen Finance and Operations / Maintenance ensured a consistent accounting approach across all sites. The program aims to reduce the Collen carbon footprint of our global office, corporate travel, waste and water use, employee commuting and goods and services consumption, among other areas, through the purchase of renewable energy and the Collen Bio- Diversity Project.

## Biodiversity Project

We recognize the urgent need to address environmental challenges, and we are committed to taking concrete actions to minimize our ecological footprint: Recently, Collen has undertaken the development of a nearly 50-acre woodland area in Kilkery, County Sligo. This significant initiative serves as a prime example of Collen's solid commitment to environmental sustainability.

Phase 1 of the project has been successfully completed in June 2022, encompassing the planting of over 2000 Irish trees and the implementation of biodiversity enhancements. Our current plan focuses to maximize carbon sequestration and storage within the forest portfolio. Planting native broadleaves, adding wildflowers, and installing bird and bat boxes are among the measures already completed to enhance the local mammal and biodiversity of the site. These measures are crucial in enabling the forest to naturally reduce atmospheric carbon dioxide and effectively store carbon within the forest biomass and soil.

Ongoing operations within the woodland will contribute to both increased carbon capture and enhanced biodiversity, reflecting Collen's dedication to corporate social responsibility and their goal of achieving sustainability and carbon neutrality. A comprehensive carbon assessment has already been conducted, and future measurements will be taken within the next few years to evaluate the extent of



carbon sequestration achieved. This project holds immense potential, and further development plans are currently underway.

Drone footage Sligo Forest development.

[https://www.linkedin.com/company/collen/videos/?lipi=urn%3Ali%3Apage%3Ad\\_flagship3\\_company%3BtNewZpsgSZqccrXuvojASw%3D%3D](https://www.linkedin.com/company/collen/videos/?lipi=urn%3Ali%3Apage%3Ad_flagship3_company%3BtNewZpsgSZqccrXuvojASw%3D%3D)



Internally, the Collen Environmental Team brings together Collen employees who are passionate about the environment, publishes knowledge-based resources, and works to drive sustainable initiatives through our local offices and communities. Collen Environmental Team aims to instill a culture of environmental advocacy and action through educational sessions that focus on sustainable practices along with informative webinars. Collen supports the Environmental Team’s commitment to creating positive change throughout the Company and our neighboring communities as we drive to achieve our longer-term net-zero goals.

With respect to our business functions, we account for a relatively small, manageable environmental impact due to the use of natural







## 2. Social

### Human Capital Management

The company's most valuable asset is its people, and Collen has made deliberate investments to ensure that it remains an employer of choice to attract, retain and develop top talent. Collen strives to create a work environment in which individuals are empowered to establish their own work objectives, aligned with Collen's overall business strategy and within the context of their area of discipline.

Collen has extended its commitment to attracting, retaining, developing, and motivating its employees throughout 2022/2023, by adding new professional development opportunities to bring internal job opportunities.

#### Employee Demographics

The following table illustrates Collen Sweden employees gender distribution by career level for reporting period 01/04/2022 -30/03/2023.

Sweden		
Career level	20	
	Female	Male
Executive	0	3
Senior	4	27
Mid	12	55
Entry	3	6
Not Disclosed	0	

Employment contract for Collen Sweden (permanent & temporary) by gender	
- Permanent (Regular employees)	
- Total:	107
Employment type for Collen Sweden (full-time & part-time) by gender:	
- Female	18 Full Time; 1 Part-time
- Male	89 – Full time; 2 Fixed term
- Undeclared (Not declared, zero data)	

### Attracting and Retaining Employees

Our people are the primary driver of our success. Collen is committed to attracting top talent and retaining, developing and motivating our employees.

We are actively working to establish Collen as a destination employer, having created a dedicated Talent Attraction team and establishing key partnerships to attract diverse talent in across all markets in which we operate. To continue strengthening our employer brand, we launched our newly designed website during 2022, to provide a much better candidate experience. We seek to hire locally wherever possible, for all levels, additionally, we introduced new hire and employee exit surveys to better understand why employees join, and leave, Collen.

Workforce Attrition rate 5.45%

### Growth and Advancement

Collen's Annual Review program has been established to enhance the job performance and professional growth of each employee. Under this program, every employee is asked to create a professional development plan for themselves each

year, in concert with their manager, and record this plan in our HR software M Files.

In 2022, we continued to assess the current state of our talent, define the skills needed to achieve our strategic goals, set performance objectives to measure individual growth, provide opportunities for skills development and utilize the process to advance talent equitably

In addition to providing mechanisms for ongoing feedback throughout the year, managers informally assess his or her employees in writing during the mid-year period and complete a formal year-end performance review by the end of each calendar year.

## **Training and Education**

Collen supports the development of its employees through each important transition in their careers

– as new entrants to the organization, as developing professionals, as managers of teams and people and as leaders who lead the global organization.

## **Wellness and Financial Security**

At Collen our focus on health & safety, inclusion, collaboration, and wellbeing is unparalleled. We live our family company values, placing Collen team members at the heart of the company. As Collen continues to grow, the company actively seeks new talent to join the exciting journey. Strong family values make Collen a supportive, attractive, and exciting place to work and build successful careers.

The employment offer at Collen is compelling, competitive, and developed in partnership with Collen employees to reflect what matters most to them. The total reward package at Collen includes:

Competitive Salary

Pension, Life assurance & income protection benefits throughout employment.

Development and further training opportunities for shaping and realising career goals.

Education opportunities to support 3rd level education .

An opportunity to access and progress professional memberships to Charterships.

Global mobility support to expand employee horizons within Collen while developing knowledge while forging a successful career.

Generous family leave and flexible working options.

A supportive and generous framework of employee leave policies.

Travel benefits or company car depending on location of the position.

A Diverse & Inclusive environment where a dedicated Diversity and Inclusion committee work collaboratively to make positive changes at Collen.

Employee Assistance Program – The (EAP) is a purpose-built service that offers a vehicle for employees to resolve varied, personal or work-related concerns, which can influence performance in the workplace.

Community Programmes - Collen support local organizations, schools and colleges in each company location. Employees are encouraged and have the opportunity to engage with the community initiatives which most appeal to their personal interests.

## **Diversity, Equity and Culture**

The Collen Diversity Committee is responsible for ensuring equitable employment and career development practices across the company, as well as fostering a culture of inclusion and belonging for all. During 2022, we focused on educating our employees on diversity topics, including optional diversity training for all employees, and required inclusive leadership training for all managers.

Collen attained the Investors in Diversity Silver Award on the 31st of January from the Irish Centre for Diversity in recognition of its diversity and inclusion programme.

The accreditation benchmarks Collen against other bodies and affirms that it has both embedded diversity and inclusion practices throughout the organization as well as developed and fostered a sense of fairness and belonging among all colleagues. A series of initiatives are planned by the Collen Diversity and Inclusion committee annually to keep diversity and inclusion in focus and support areas for further development.

The successful accreditation demonstrates Collen's commitment to promoting a positive working environment where everyone feels valued, respected and included.

Additionally all subcontractors appointed by Collen for our Swedish projects are provided with the Supplier Code of Conduct to ensure alignment in business practices with the client's expectations. Collen is developing a system of greater subcontractor engagement that assists in supporting diversity and inclusion along with safety and sustainability deliverables. Collen has a rich tradition of supporting local charities and communities, through charity events and fundraising, which offer support services to disadvantaged groups, such as women's refuge, youth in disadvantaged areas, access to apprenticeship, suicide prevention and mental health. CSR is an active part of the Collen culture and extends to all regions of active operations.

## Data and Information Privacy

In January 2021 Collen achieved ISO 27001 accreditation, this international standard for information security requires organizations to identify information security risks and select appropriate controls to tackle them. Those practices are outlined in Annex A of ISO 27001, which contains 114 controls divided into 14 domains.

Reflecting the unique risks and potential harm posed by mishandling or misuse of personal data, Collen's GDPR Policy in conjunction with the ISO 27001 accredited information security system builds on the foundation of our information security program to apply special governance, policies, procedures and training on the use, handling and processing of personal data and performance of activities that impact privacy rights (as determined by the jurisdictions in which we operate).

Collen appreciates the special obligations that apply to processing personal data and individuals' rights to privacy and personal data protection. Collen's privacy compliance program is designed to enable adherence to laws and regulations applicable to personal data that it processes, including, as applicable, the European General Data Protection Regulation (GDPR) as well as its posted Privacy Policy and contractual commitments to customers, vendors and other counterparties.

Our personnel are expected to protect and secure the confidentiality of non-public information that they receive, access or create in connection with their work at the company. This includes adhering to any laws, regulations and/or non-disclosure agreements that restrict the use of data (including personal data), require measures to safeguard it, and limit disclosure of information. It also requires that personnel limit their use of information technology assets (e. g., laptops, phones and other devices) to permitted activities so that data is not put at risk, and that they promptly report any suspected improper use or potential disclosure of data. Collen has numerous policies in place to further safeguard our technology and use thereof, including:

- Acceptable Use policy
- Data Classification policy
- Information Security policy
- Mobile Device policy

We provide training on overall information security to all our employees on a regular basis. The company works continuously, education and training of all employees, which ensures that employees are well informed about data security and ethical handling of personal data and other data.

Collen expects that its suppliers share our commitment to data and information privacy by complying with the Collen Supplier Code. As stated in the Supplier Code, Collen expects suppliers to comply with applicable laws and regulations and contract terms relating to personal data and privacy including laws and regulations of the jurisdiction where personal data originated. Suppliers must disclose

all jurisdictions in which they intend to process data on behalf of Collen and provide all information requested by Collen to assess the transfer of personal data to such locations.

To support these principles, Collen maintains a comprehensive and consistent set of information security documentation and requirements intended to protect the security, reliability, integrity, accuracy, confidentiality, and availability of Collen information assets. These documents record the security controls and personnel responsibilities established to protect Collen information and information systems against both accidental and unauthorized access, modification, interference, disclosure, and destruction. These include our Information Security policies, which apply to personnel (full-time and part-time employees, and contractors) working for Collen. Within this reporting period, no breaches to our information systems were reported/identified.

## Human Rights

Collen supports fundamental human rights—both inside and outside our company—and demonstrates its commitment by enacting responsible workplace practices across our global enterprise. Collen believes in the fundamental dignity of every human being and the rights of every individual to live and work safely and humanely, without fear of oppression or coercion.

A critical risk for human rights relates to operations of listed companies that operate in areas where the enforcement of national legislation and international conventions might be limited. Our Vision, Mission and Values Statements, along with our Code of Ethics and Employee Handbooks, emphasize responsibility, integrity, and values-based decision-making and set forth our standards for conducting our business ethically and consistent with our moral principles.

These principles and standards shape our interactions with fellow employees, clients, suppliers, communities, and markets around the world—and with our community of shareholders, too. They are foundational to our company and enable our continued success. Collen has incorporated within its Code of Ethics, corporate policies, or programs specific requirements to put the following principles into practice:

- Equal Employment Opportunity and Discrimination
- Dignity at Work
- Grievance Policy
- Diversity and Inclusion
- GDPR
- Health and Safety at Work
- Information Security Policy

Human rights are reinforced through training and effective employee communication, including inductions and webinars. Collen views human rights due diligence as a continuous process, which we constantly adapt and improve. We acknowledge the responsibility to respect human rights as outlined in the UNGP.

### 3. Governance

#### Business Ethics and Integrity

The Collen Business Ethics and Integrity Policy is designed to meet or exceed available standards, including guidelines by European regulators. Collen embraces good governance by holding ourselves to the highest ethical standards in all interactions.

Collen values its reputation for ethical behavior, financial honesty, integrity, and reliability. There are a number of fundamental principles and values which it believes are the foundation of sound and fair business practice and as such are important to uphold. The trust and respect from Collen employees, clients, customers, stakeholders, and the general public are assets that cannot be bought and are the foundation for success. For these reasons all employees must conduct themselves in adherence with these principles and values. The impact of any wrongdoings and unethical behavior upon our business could be both damaging and detrimental.

Every employee has a right to expect that our business maintains proper standards, and everyone has a duty to maintain these standards through their decisions, actions and what they say. A heavier responsibility is borne by those who hold positions of authority. They must openly demonstrate leadership in applying the business practices outlined in the Business Ethics and Integrity Policy.

The Policy is supported by the Board of Directors and shall be reviewed from time to time. It covers the main issues that may be encountered at work, and sets out standards of professionalism and integrity to be maintained by individuals.

All employees have the right and the responsibility to resolve doubts or uncertainties about ethical questions and should, in the first instance, contact their manager for guidance prior to taking any action. An 'open door' policy is encouraged in Collen so that, if necessary, such queries can be brought to the attention of higher levels of management.

A Whistle-blowing Policy and Procedure is also in place where specific concerns can be raised without fear of discrimination.

#### Collen's Key Business Principles

The key Business Principles are outlined below:

Discrimination or harassment of any kind will not be tolerated

Fair terms of employment are provided to all employees together with appropriate opportunities to develop skills and progress in their careers.

The diversity of workforce is strength to the business. All employees regardless of their colour, race, religion, gender, marital status, sexual orientation, disability or age will be treated equally, with fairness, honesty, respect and dignity. Harassment (including sexual, physical, mental, use of abusive language or offensive gestures) or bullying, in any shape or form will not be tolerated. Any employee who is proved to have acted in a discriminatory manner or to have indulged in bullying or harassment will be subject to disciplinary action and all employees are strongly encouraged to report such incidents.

A safe and healthy environment will be maintained for people to work in

Collen recognises its responsibility and the benefits of providing a safe working environment. We aim to comply with legislative, safety rules and procedures through preventing accidents from happening. We do this by understanding the risks present in our working environment and how accidents can occur. Health and Safety processes are in place to reduce risks within the workplace.

All within the Collen organization have a responsibility for safety in the workplace, and we must:

- Be familiar and comply with our Health and Safety Policy and all local operating procedures.
- Think through and identify the risks and hazards in our working environment.



- Intervene immediately if someone is putting themselves or others at risk.
- Report all safety risks promptly to a manager or Health and Safety representative. We will be proactive in managing our responsibilities to the environment.
- Each has a personal and collective responsibility to use resources efficiently and give consideration to the impact of our products and operations on the environment, and to take steps to address these.

It is recognised that day-to-day operations have the potential to damage the environment. To keep this impact to a minimum, resources must be managed efficiently to minimise waste. Responsibility is taken for reducing the use of energy, water and other materials and trying to recycle where possible. To this end, ColLEN has established an Environmental Department and to develop and deliver an effective Sustainability policy.

## Confidentiality

Everyone within ColLEN has a responsibility to keep confidential all information relating to the business as well that of our clients, customers and suppliers.

Every employee should take steps to ensure that confidential information is protected. This applies to confidential information regarding ColLEN's employees, clients, customers and suppliers. Under no circumstances should such information be disclosed to third parties including the media. This obligation continues when an employee leaves the business.

The confidentiality obligations contained in this Policy are in addition to any obligations detailed in employment contracts, any policies and other documentation issued.

No bribes can be given or received

ColLEN, nor any of its employees, will offer, give or receive bribes or inducements of any sort for any purpose.

A bribe includes any payment, benefit, or gift offered or given with the purpose of influencing a decision or outcome. The payment may not be of large value and it could be as simple as a lunch or for example, an invitation to a sporting event. We are each responsible for knowing what our business guidance allows and what the law permits regarding gifts and benefits given to or received from clients, customers, suppliers or other third parties. The Company has in place a Business Gifts Policy which must be followed. If in doubt, seek guidance and approval from your manager before accepting or giving any gift or entertainment.

Conflicts of interest must be avoided and in all cases must be reported

Everyone has a responsibility to disclose and seek direction on any issues that may potentially conflict with our responsibilities to the business.

Conflicts of interest happen in situations where competing interests conflict and impair our ability to make objective and unbiased business decisions. A conflict of interest can take many forms, including; managing or recruiting a family member or friend; having a second job or holding financial interests in suppliers, clients or customers. In all cases a conflict must be disclosed to a manager as soon as it becomes apparent.

## Anti Bribery

ColLEN commits to compliance with all laws, rules and regulations governing anti bribery and corruption law. Under EU law, bribery and corruption is punishable for individuals, and if the business is found to have failed to prevent bribery or taken part in corruption it could face an unlimited fine, be excluded from tendering for Government contracts and face untold damage to its reputation.

Under EU law the payment, or offer to pay bribes, or the provision of or offer to provide gifts or anything of value or other advantage for improper purposes to obtain or retain business or any other benefit, (whether for the Company or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this Policy and may result in immediate dismissal for those involved in their payment or receipt.

Collen recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Collen's aim therefore is to limit any exposure to bribery by:

- Setting out a clear anti-bribery stance;
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Appropriate internal controls are in place which will evidence the business reason for making payments to third parties.

#### Related Policies

- Business Gifts Policy
- Code of Conduct
- Disciplinary Policy
- Whistle-blowing Policy
- The above list is not exhaustive and other policies may be applicable

## Risk Management

Collen's Risk Management Committee has established an Enterprise Risk Management (ERM) framework to identify, assess, monitor, measure, and treat risks, including information-security risks. The Risk Management Committee facilitates ERM Framework execution within Collen's business units and expert functions, coordinates risk management activities across the Company, and aggregates and reports risk information on a regular basis.

## Information and Cyber Security

The information security department is responsible for coordinating the protection of the Collen Group's core business operations and information against real-world cyber threats, by employing technology, policy, processes, education programs, and sound design techniques across the organization. Collen's Chief Information Officer (CIO) who reports directly to Collen's CEO manages the Information Security Department (ISD).

The ISD team is responsible for:

- Maintaining and implementing Collens ISO 27001 Information Security System;
- Performing and coordinating security assessments and vulnerability scans of Collen's internal, external and third-party applications;
- Implementing and maintaining Collen's various information security-related policies and standards;
- Middleware and vulnerability management in addition to special projects as designated by the CIO;
- Collen's compliance efforts for General Data Privacy Regulation (GDPR) and all supporting data privacy and protection efforts;
- Configuring Collen Group infrastructure and the applications running thereon in accordance with Collen's configurations policies, processes and standards;
- Monitoring threats against Collen, and providing recommendations for securing potentially vulnerable populations at Collen in the context of emerging threats.

On an annual basis, the Information Security team reviews and updates its governance documents, and then presents the revised documents to the Audit & Risk Committee for review and/or approval.

Our Audit & Risk Committee receives reports, as well as additional reports as needed, on cybersecurity and information security matters from our Chief Information Officer.

The Collen Information Security Management System (ISMS) that governs the global enterprise infrastructure and supports key global information security processes, and includes technology, personnel, locations and data centers, conforms to ISO 27001 requirements and is ISO 27001 certified.

### **Other sources**

For further information on Collen efforts relating to sustainability, please refer to the Collen Sustainability Page <https://www.collen.com/about/sustainability>