





STATEMENT ON EU TAXONOMY

In 2023, Komplett Group has conducted a comprehensive assessment to report in line with the EU Taxonomy disclosure requirements, including mapping of relevant financial data, mapping of relevant eligible activities according to the Climate and Environmental Delegated Acts, and conducting an assessment of the group's economic activities in alignment with the EU Taxonomy. The process has been managed at group level, with data collection and activity screening processes carried out in collaboration with all subsidiaries.

BACKGROUND

The EU taxonomy is a classification system for environmentally sustainable activities. It is a key component of the European Commission's action plan to reorient capital flows towards economic activities that are deemed sustainable. By reallocating capital and direct investments towards sustainable projects and activities, EU aims to take a step closer to reach the objectives of the European Green Deal. To achieve this, a clear definition of what an 'sustainable activity' is, was needed, which called for the creation of the EU taxonomy.

ECONOMIC SUSTAINABLE ACTIVITIES

In the EU taxonomy, a sustainable economic activity is an economic activity providing a substantial contribution to one of six environmental objectives, defined by the EU Commission:

- 1. Climate change mitigation
- 2. Climate change adaptation
- Sustainable use and protection of water and marine resources
- 4. Transition to a circular economy
- **5.** Pollution prevention and control
- **6.** Protection and restoration of biodiversity and ecosystems

Substantial contribution to one objective listed above must go with not significantly harming any of the other objectives. In addition, the economic activity must comply with minimum social and governance safeguards.

DISCLOSURE REQUIREMENTS

Organisations, here both companies under the scope of the Non-Financial Reporting Directive (NFRD) and financial market participants that offers financial products, are required to

report on their alignment with the EU Taxonomy Regulation, by reporting on two main components:

Taxonomy-eligibility: Share of economic activities described in the Delegated Acts supplementing the EU Taxonomy Regulation.
Conversely, a non-eligible activity refers to any economic activity not yet described in the Delegated Acts supplementing the Taxonomy Regulation.

Taxonomy-alignment: Share of eligible activities meeting the technical screening criteria set out in the Delegated Acts for that activity, in addition to minimum safeguards. This invites organisations to do a screening process, in which an eligible activity is assessed in terms of its:

- "substantial contribution" to one of the six environmental objectives,
- "do no significant harm" to the other five environmental objectives,
- ► compliance with "minimum safeguards"¹

Taxonomy eligibility and alignment performance are reported on three key performance indicators: net turnover, capital expenditure (CapEx) and operational expenditure (OpEx), for each economic activity classified as eligible and aligned.

¹⁾ Compliance with minimum safeguard criteria is done through our policies in accordance with; OECD Guidelines for multinational enterprises, UN Guiding principles on Business and Human Rights in addition to the principles of the Declaration of the International Labour Organization on Fundamental Principles and rights of work, as well as the International Bill of Human Rights. Please refer to Komplett Group's statement on due diligence in their Transparency Act statement, and the governance chapter in the annual report for 2023.



Turnover

Total turnover corresponds to total operating income in the consolidated income statement in the Annual Report. Please see Note 6 in the consolidated income statement.

The total operating income for Komplett Group was NOK 15.9 billion in financial year 2023 and forms the basis for evaluating taxonomy-eligibility and taxonomy-alignment

CapEx

CapEx refers to capital expenditures, which here is disclosed in accordance with the EU Taxonomy. This KPI includes additions to tangible and intangible assets excluding goodwill and fair value changes. Please see Note 12 Property, plant and equipment, Note 11 Intangible assets, and Note 19 Leases in the consolidated financial statements for reference.

For Komplett Group, the total CapEx in accordance with the EU Taxonomy definition was NOK 419 million in financial year 2023.

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OpEx refers to operating expenses and under the EU taxonomy this include non-capitalised research and development expenses, short-term lease expenses and maintenance and repair costs (including building renovation measures). Please see the consolidated financial statements for reference.

For Komplett Group, the total OpEx in accordance with the EU Taxonomy definition was NOK 32 million in financial year 2023.

SCOPE

Komplett Group falls under the scope of the EU Taxonomy regulation, as the regulation applies to large public entities under the scope of the NFRD with more than 500 employees.

The Norwegian government established the EU Taxonomy regulation as part of Norwegian law on 1 January 2023, which implies mandatory reporting for the financial year 2023 for Komplett Group. Disclosures in this report cover the period 1 January 2023 to 31 December 2023 and relate to all the six environmental objectives of the EU Taxonomy. For the financial year 2023, companies must report on taxonomy-eligibility for all the objectives, while taxonomy-alignment reporting is only required for the two first objectives. Komplett Group has chosen to exceed reporting requirements for 2023, assessing alignment with the newly established criteria for "Transition to a circular economy" in the Environmental Delegated Act.

THRESHOLD VALUES

To avoid reporting on negligible figures, thresholds have been used in the assessment process. If any of the economic activities have associated KPI figures below the threshold, they are not considered eligible for the 2023 report.

Threshold values for financial year 2023:

▶ **OpEx:** 0.5% of total (NOK 10 million)

► CapEx: 0.5% of total (NOK 2 million)

► Turnover: 0.5% of total (NOK 80 million)

ASSESSMENT OF ACTIVITIES FOR 2023

Komplett Group operates in the retail and e-commerce sector, where few of its primary economic activities are included in the EU Taxonomy at reporting date. Therefore, most of the group's economic activities are defined non-eligible, meaning that these are not described in the delegated acts at the time of reporting. As the Taxonomy evolves in the

coming years, additional activities may be added to the framework.

The taxonomy eligible economic activities have been identified by screening the activities in the Climate Delegated Act (Commission Delegated Regulation (EU) 2021/2139), the Complimentary Climate Delegated Act (Commission Delegated Regulation (EU) 2022/1214), the Environmental Delegated Act ((Commission Delegated Regulation (EU) 2023/2486), and the amendments to the Climate Delegated Act (Commission Delegated Regulation (EU) 2023/2485).

To determine whether the eligible economic activities qualify as environmentally sustainable (taxonomy-aligned), the activities have been assessed by screening against the criteria outlined in Regulation (EU) 2020/852, article 3. Additionally, the taxonomy-alignment of these eligible activities has been evaluated according to Annex II of the Environmental Del-



egated Act, with the examination of technical screening criteria for environmental objectives undertaken for each activity, and the assessment of minimum safeguards conducted at the Group level.

Taxonomy-eligible and -aligned activities

The table below outlines the share of Komplett Group's net turnover, CapEx and OpEx attributed to economic activities identified as taxonomy-eligible, and taxonomy-aligned.

FY 2023	Total (MNOK)	Share of Taxonomy- eligible economic activities	Share of Taxonomy- aligned economic activities	Share of non- eligible economic activities
Turnover	15 861	0.1%	0.1%	99.8%
Capital expenditure (CapEx)	419	0%	0%	100%
Operating expenditure (OpEx)	32	20%	0%	80%

IDENTIFYING ELIGIBLE AND ALIGNED ACTIVITIES

Komplett Group has identified three Taxonomy-eligible activities, all linked to the environmental objective "Transition to a circular economy". Although the technical screening criteria for taxonomy-alignment for these activities have not yet been enforced in Norwegian law, Komplett Group has screened the identified eligible activities against the technical criteria outlined in the recently approved Environmental Delegated Act at a high-level.

5.1 Repair, refurbishment, and remanufacturing

Repairment of products in-house is an eligible activity according to the EU Taxonomy. The economic activities relate to Komplett Group's

repair of products that can be classified under the NACE code C26 Manufacture of computer, electronic and optical products, and C27 Manufacture of electrical equipment.

Komplett Services and NetOnNet performs repairs as part of their service offerings, but Webhallen has limited in-house repair capabilities. Komplett Services repairment activities are mostly connected to standard and robot vacuum cleaner. NetOnNet primarily conducts its repairs on private label products, especially within the TV and electric vehicles categories. However, repairs of electric vehicles are not included in the definition of the eligible activity, hence excluded from Komplett Group's reporting on eligibility on this activity.

To make a substantial contribution to the environmental objective *Transition to a circular economy*, Komplett Group's repaired products must be conducted with the intention to extend the lifetime of the products. The replaced or broken parts in the repaired products must also either be reused, recycled, or disposed in accordance with applicable EU and national legislations. All Komplett Group's repairment activities fulfils the technical criteria for substantial contribution.

Komplett Group has screened its eligible repair activities against the "Do no significant harm" ² outlined in Annex 2 of the Environmental Delegated Act and the "minimum safeguards" criteria on a company level ³. All of the Group's eligible repair activities meet these

²⁾ The DNSH criteria for climate change mitigation, including GHG emission limits, and the general criteria outlined in appendix A, B and C for climate change adaption, sustainable use and protection of water and maritime resources and pollution, and prevention and control were assessed. For Financial year 2023, no DNSH criteria were set for biodiversity and ecosystem protection and restoration.

³⁾ Minimum safety criteria are evaluated at the company level, with further details available in Komplett Group's Transparency Act statement and the governance chapter of the 2023 annual report.



criteria and are classified as aligned under the EU Taxonomy.

5.4. Sale of second-hand goods

Komplett Group's resale of second-hand products is an eligible activity. This encompasses Komplett Group's sales of second-hand products previously used for their intended purpose before by customers, and that can be classified under the NACE codes C26 and C27.

This includes NetOnNet's resale of second-hand products, sourced from an external partner and sold as used products, marked as "used" (Swedish: "begagnade"), through its sales channels. In addition, the eligible activity covers NetOnNet's sale of products received from the trade-in program, known as "Byt in", which is sold to an external partner for resale to end-customers. Webhallen has a similar trade-in program, but as the customers sells this directly to the external partner these transactions are not considered eligible.

Both NetOnNet and Webhallen sell products in the "Bargain" category (Swedish: "Fyndvaror"), sold at reduced prices due to repairs, minor defects, being opened, or damaged packaging. Similarly, Komplett Services, sells products in the "Demonstration" category (Norwegian: "Demovarer"), including demo products, returned products and repaired products resold to end-consumers. However, due to uncertainty regarding whether these products meet the definition in the Taxonomy for second-hand, these activities are considered non-eligible.

The eligible activity within Komplett Group's sale of second-hand goods, the sale of prod-

ucts in NetOnNet's "used" category ("begagnade"), has been screened against the technical criteria to make a substantial contribution to the environmental objective:

Transition to a circular economy. The company ensures compliance with strict packaging material requirements, confirmed by the FSC certificate, aligning with the technical criteria set for substantial contribution for this activity. The DNSH criteria and minimum safeguard assessment followed the same process as for activity 5.1, were assessed compliant, and hence assessed as taxonomy-aligned.

NON-MATERIAL ELIGIBLE ACTIVITIES

The following activities have been identified as eligible economic activities, but falls below Komplett Group's threshold, and is therefore seen as non-material eligible activities:

5.2 Sale of spare parts

Komplett Group has eligible economic activities related to 5.2, as some of the products sold fall within the scope. The economic activity relates to Komplett Group's sale of spare parts that are used in products classified under the NACE codes C26, C27, C28.22-24 and C31. A spare part, as defined in the Taxonomy, means a separate part of a product that can replace a part of a product with the same or similar function. The product cannot function as intended without that part of the product.

Komplett Services and Webhallen do sell spare parts directly to customers, but the amounts are minor, and it is also questionable if the spare parts are meeting the definition of a spare part or if the products are consumables.

NetOnNet sells spare parts mainly for private label products. Some are within the aforementioned NACE code, but most of the spare parts are connected to electrical vehicle / E-Scooters and barbeques which are not covered by the NACE code in the taxonomy.

NetOnNet's spare part sales represent turnover figures below the reporting threshold for Komplett Group's taxonomy report. Consequently, this activity is not included as an eligible activity and the technical screening process have not been done.

5.5 Product-as-a-service and other circular use- and result-oriented service models

NetOnNet's "Hyreshyllan", is a circular use-oriented service model that qualify as an eligible activity according to the EU taxonomy. Through Hyreshyllan, customers get access to items through a rental agreement, but the products ownership remains with NetOnNet. Upon the return of rented products, has the flexibility to either re-rent the products or sell them as outlet products.

Komplett Services has a business model called FLEX that exhibits elements of both circular use-oriented services and traditional ownership models. Customers in the FLEX program own the product and hence this activity falls outside the definition in the EU taxonomy, as the ownership must remain with the provider and not the end customer.

The figures associated with this activity falls below the threshold for this year's taxonomy report and the technical screening process has not been done.



OTHER ECONOMIC ACTIVITIES ASSESSED AND DEEMED AS NON-ELIGIBLE

1.2 Manufacture of electrical and electronic equipment

Komplett Group's subsidiaries operate under an Extended Producer Responsibility framework and possess a certain level of influence over the actual manufacturers of Private Label products. However, it's important to note that Komplett Group itself does not engage in the direct manufacturing of any products. Instead, the Private Label business is executed in collaboration with a local manufacturer. While Komplett Group does exert some influence on the production process, the company primarily relies on requesting specific products to be produced.

In essence, Komplett Group subsidiaries are limited to selecting products from the manufacturer's existing catalogue, so called off-the-shelf products. As such the company have assessed the economic activity 1.2 to fall outside of the scope of the taxonomy report.

2.3 Collection and transport of nonhazardous waste in source segregated fractions

Komplett Group's subsidiaries play an important part in the value chain by facilitating the collection of Electrical and Electronic waste (EE-waste). Customers can deliver EE-waste to physical stores, pick-up points, or send it directly to a subsidiary's warehouse. However, once at a Komplett Group's location, third-party companies take charge of collecting and managing the EE-waste. For major domestic appliance (MDA) products, collection occurs at the customer's premises during the delivery of a new product. However, it's noteworthy that

these MDA products don't circle back to Komplett Group's subsidiaries; instead, they are directly managed by third-party suppliers.

While some components from the EE-waste are utilised for future repairs of other products, the subsidiaries do not actively collect the EE-waste with the specific aim of preparing it for reuse or recycling.

In conclusion, Komplett Group's subsidiaries do not engage in eligible activities related to activity 2.3, as these aspects are outsourced to third-party entities.

5.3 Preparation for re-use of end-of-life products and product components

The scope of the activity, as defined in the annex 2 of the Climate Delegated Act, does not include repair activities which are performed during the product's use stage. Instead, it stipulates that preparing for re-use is an operation or set of operations by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing. Komplett Group's subsidiaries are involved in repair of products, but not as part of the preparation for re-use of end-of-line products and product components. Therefore, the activity 5.3 has been assessed to be outside of the scope of Komplett Group's taxonomy report.

5.6 Marketplace for the trade of secondhand goods for reuse

The economic activity refers to operation of marketplaces and classifieds for the trade of second-hand goods, acting as intermediaries to match buyers with sellers or providers of those goods. As Komplett Group's subsidiar-

ies only purchase second-hand products from partners and sells directly to customers without operating a platform that connects multiple buyers and sellers, the activities related to the EU Taxonomy definition of activity 5.6 falls outside of the scope and is not an eligible activity for Komplett Group.



APPENDIX: KPI TABLES

The key performance indicators (KPIs) include turnover, CapEx, and OpEx.

The KPIs are presented using the templates in Annex II to the Disclosures Delegated Act.

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2023

					Substa	ntial Cont	ribution	Criteria			('Does	DNSH o Not Sign	criteria ificantly l	Harm')					
Economic Activities	Code	Turnover	Proportion of Turnover	Climate Change Mit igation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards	Taxonomy aligned (A.1) or eligible (A.2) proportion turnover, year N-1	Category enabling activity	Category transitional ctivity
		MNOK	%			Y; N;	N/EL	•	•			Υ/	N				%	E	Т
A. TAXONOMY-ELIGIBLE AC	CTIVITIES																		
A.1. Environmentally susta	inable act	ivities (T	axonomy-a	aligned)											,				
Sale of second-hand goods	CE 5.4	17	0.1%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Υ	Y	-	N/A	Y	N/A		
Turnover of environmentally sustainable activities (Taxonomy-aligned)(A.1)"		17	0.1%	0%	0%	0%	0%	0.1%	0%								N/A		
Of which Enabling		0	0.0%	0%	0%	0%	0%	0%	0%								N/A		
Of which Transitional		0	0.0%	0%													N/A		
A.2 Taxonomy-Eligible but	not envir	onmenta	lly sustaina	able activ	ities (not	Taxonon	ny-aligne	d activiti	es)										
						EL; N	N/EL												
Sale of second-hand goods	CE 5.4	15	0.1%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								N/A		
Turnover of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)(A.2)		15	0.1%	0%	0%	0%	0%	0.1%	0%								N/A		
A. Turnover of Taxonomy eligible activities (A.1+A.2)		32	0.2%	0%	0%	0%	0%	0.2%	0%								N/A		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomynon- activities	eligible	15 828	99.8%																
TOTAL		15 861	100.0%																



Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2023

				Substantial Contribution Criteria					DNSH criteria ('Does Not Significantly Harm')										
Economic Activities	Code	CapEx	Proportion of Turnover	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards	Taxonomy aligned (A.1) or eligible (A.2) proportion turnover, year N-1	Category enabling activity	Category transitional ctivity
		MNOK	%			Y; N;I	N/EL					Υ/	N				%	Е	Т
A. TAXONOMY-ELIGIBLE	ACTIVITIE	S																	
A.1. Environmentally sust	ainable a	ctivities (1	axonomy-	aligned)															
-																	N/A		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	-	-	-	-	-	-								N/A		
Of which Enabling		0	0%	-	-	-	-	-	-								N/A		
Of which Transitional		0	0%	0%													N/A		
A.2 Taxonomy-Eligible bu	ıt not envi	ironmenta	lly sustain	able acti	vities (no	t Taxonor	ny-aligne	ed activit	ies)										
						EL; N	N/EL											•	
None		0	0.0%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								N/A		
CapEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)(A.2)		0	0%	0%	0%	0%	0%	0%	0%								N/A		
A. CapEx of Taxonomy eligible activities (A.1+A.2)		0	0%	0%	0%	0%	0%	0%	0%								N/A		
B. TAXONOMY-NON-ELIGI	B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
CapEx of Taxonomy non-eactivities	eligible	419	100%																

TOTAL



Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2023

				Substantial Contribution Criteria					DNSH criteria ('Does Not Significantly Harm')										
Economic Activities	Code	OpEx	Proportion of Turnover	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards	Taxonomy aligned (A.1) or eligible (A.2) proportion turnover, year N-1	Category enabling activity	Category transitional ctivity
		MNOK	%			Y; N;I	N/EL					Υ/	N				%	Е	Т
A. TAXONOMY-ELIGIBLE	ACTIVITIE	S																	
A.1. Environmentally sust	tainable a	ctivities (T	axonomy-	aligned)															
Repair, refurbishment, and remanufacturing	CE 5.1	6	20%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Υ	Y	-	N/A	Y	N/A		
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		6	20%	0%	0%	0%	0%	20%	0%								N/A		
Of which Enabling		0	0%	0%	0%	0%	0%	0%	0%								N/A		
Of which Transitional		0	0%	0%													N/A		
A.2 Taxonomy-Eligible bu	ut not env	ironmenta	lly sustain	able acti	vities (no	t Taxonor	ny-aligne	ed activit	ies)										
						EL; N	N/EL											•	
None				N/EL	N/EL	N/EL	N/EL	EL	N/EL								N/A		
OpEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)(A.2)		0	0%	0%	0%	0%	0%	0%	0%								N/A		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		6	20%	0%	0%	0%	0%	20%	0%								N/A		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomynon-el activities	igible	26	80%																

100%

TOTAL



Nuclea	r and fossil gas related activities	
Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels	NO

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