



Sustainability  
report  
**2021**

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# A message from our CEO

This year has brought many developments and much exciting news for Komplet Group. The two biggest highlights include the listing on the Oslo Stock Exchange and the acquisition of Ironstone Holding in June. Ensuring that sustainability is part of everything we do is one of the pillars of Komplet's business strategy, and in 2021 we started implementing the actions of our sustainability plan. Entering 2022, we continue to make improvements when it comes to incorporating sustainability into our daily operations.

In 2021, we celebrated our 25<sup>th</sup> anniversary. As I write this, I am proud of the journey we've been on since Komplet was established as an e-commerce business on the Norwegian market in 1996. There have been many transformational shifts in the market and preferences of consumers since then. Komplet has continually adapted and matured with the times, leading the way in the development of online retailing of electronic products in the Nordic market. In more recent years, we have intensified our sustainability commitment to ensure that business growth does not compromise the wellbeing of society and the environment. Last year we identified sustainability as one of the key pillars of our 2025 business strategy. Following Komplet's listing in 2021, this work has become even more important with higher expectations of

us to reduce our carbon footprint and to increase the transparency of our supply chain.

There are several sustainability challenges facing the electronic retail industry, with the sourcing and disposal of minerals, used in electronic components and computer products, being the most crucial. Therefore, our sustainability pillar, "Komplet Circular", aims to minimize the environmental impact of mineral use by increasing our commitment to the recycling and reuse of electronic components. In 2021, we launched the product subscription service FLEX to facilitate the resale of products in the secondhand market after use. FLEX represents a solid circular economy initiative supporting our sustainability agenda making it easier for consumers to dispose of their products re-



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Overall, I am happy to see the many right steps taken by our companies in 2021; while I also recognize that we are only at the start of our sustainability journey, with much work still ahead.

sponsibly. Since the initiative's introduction in May 2021, sales from FLEX have increased to 10 percent of our revenue from the B2C segment in Komplet Norge and Sweden. We are very satisfied with this development, and it motivates us to work hard to reach our goal of growing FLEX to 50 percent of our revenue in the coming years.

Our business strategy also includes an ambitious plan to reduce greenhouse gas (GHG) emissions from our operations. Notably, our goal of offering zero-emission deliveries by 2026 requires us to adapt our business to new solutions. Throughout 2021, I learned how challenging it can be to implement these strategies and see significant improvements. We continually strive to gain a better overview of our carbon footprint, and to identify reduction measures. The Komplet team is ready to consolidate its commitment to the reduction of GHG emissions, and I am certain that we can refine our efforts to meet our goals in the coming year.

Again in 2021, the Covid-19 pandemic led to component shortages and supply chain constraints as well as posing challenges to providing a safe work environment for our employees. Taking care of our employees is a key focus area of our sustainability strategy, and in 2021 we launched several initiatives to improve employee motivation and well-being. One in particular, is the Employee Board, which was established to secure input from employees and improve communication with management. I am very encouraged with the outcomes of these initiatives, which is noticeable by the improved results from our employee surveys this year.

Further, we are laying the foundations of ensuring decent work in our supply chain. With the implementation of the Transparency Act in Norway this coming July, we will enhance our work with supplier due diligence to ensure compliance with these new standards. Having learned more about what this entails, I acknowledge that this work

will require much time and effort from many areas of the organization. However, I am confident in my competent and hardworking team, and I anticipate that we all will gain valuable insight into our supply chain through this process.

Overall, I am happy to see the many right steps taken by our companies in 2021; while I also recognize that we are only at the start of our sustainability journey with much work still ahead. I would like to extend my thanks to our team of motivated employees for their dedication and efforts so far. In 2022, I look forward to increasing our internal efforts as well as cooperating more closely with our suppliers and customers to lead the way in making the electronic retail business more sustainable.



**LARS OLAV OLAUSSEN**  
CEO

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# Komplett's Sustainability performance at a glance



755

Total number of employees



2.13%

Return rate



4539 tonnes CO<sub>2</sub>e

GHG emissions

3,6 million

Number of orders

Share of sales from circular services:

10%

from B2C segment in Komplett Norway and Sweden

11 billion

Revenue

## Diversity

 25% Women



 75% Men

38 years

Average age

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# About the report

In this annual sustainability report, we disclose updated information on the sustainability efforts Komplett Group has undertaken throughout 2021. We present to you a comprehensive summary of our activities and our approach to the sustainable development of Komplett as a business.

The report covers activities within our wholly-owned subsidiaries in Norway and Sweden. The content is structured around Komplett's three sustainability pillars: *Komplett Circular*, *Komplett Tolerance* and *Komplett Environment*. This is in addition to material topics identified through our stakeholder dialogue and materiality assessment.

Data gathered from different parts of the organization is the foundation for this report. Although much emphasis has been placed on ensuring that the data is complete and correct, some of the information may be subject to some uncertainty. In the course of the data collection for this year's report, some of the 2020 data has been corrected

due to improved data quality. Our reports are part of our sustainability journey. As we develop and learn, our data collection processes become more structured, and our data more precise. We always strive in Komplett Group, to present the most complete numbers and information on sustainability.

#### REPORTING FRAMEWORK

The report is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option. The GRI index at the end of this report provides an overview of disclosures according to the GRI Standards, including references to where in the report information related to each of the disclosures can be found.

As part of the development of this report, we have also used for inspiration the indicators from the Sustainability Accounting Standards Board and the World Economic Forum's indicators for sustainability reporting. In addition, we strive to follow the Euronext guidance on Empowering Sustainable Growth (ESG) reporting as launched in January 2020.

This report follows the same framework as the previous sustainability report for 2020, published in March 2021. Komplett Group reports on our sustainability work and engagement annually, to provide insight and transparency to our stakeholders and society at large.



Any questions relating to this report, or the sustainability work carried out by Komplett Group, can be directed to:

Kristin Hovland,  
Head of Communications

[kristin.hovland@komplett.com](mailto:kristin.hovland@komplett.com)

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# About Komplet

Komplett Group is a leading online electronics company in Scandinavia offering one of the market's broadest selections of consumer electronics and business solutions. Our business solutions include sales to public and private enterprises, large and small, as well as to wholesalers and retailers.

We operate within three reporting segments, corresponding to our three different customer types. These are: business to consumers (B2C); business to business (B2B); and resellers (distribution). We serve our customers through our eight web shops, in addition to eighteen retail stores in Sweden. The Group operates out of the head office in Sandefjord, Norway, supported by offices in Oslo, Stockholm, and Göteborg.

### Komplett Group comprises four brands

- **Webhallen:** Swedish omnichannel retailer with 20 physical stores. Strong position among gamers, tech enthusiasts, and quality-of-life conscience customers.
- **Itegra:** Distribution business with a number of A-brands and attractive partners, expanding into Sweden.
- **Komplett Bedrift:** Norway's largest online B2B player for small and medium-sized enterprises and small office/home office, expanding into Sweden.
- **Komplett:** Leading Norwegian pure play online retailer, based in Norway with attractive positions in Sweden and Denmark. Strong position among gamers, tech enthusiasts and quality-of-life conscience customers. Komplett Services is responsible for the largest share of our revenue.



Swedish omnichannel retailer, with physical footprint.

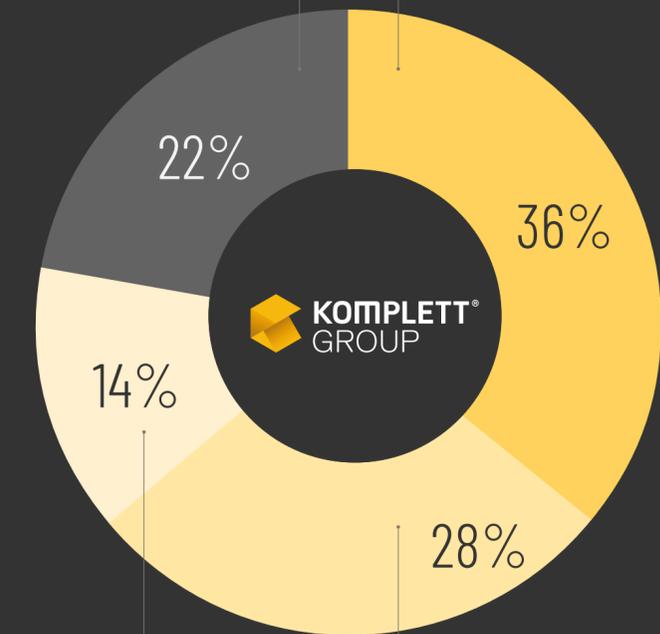
Lean and cost-effective set-up.

Strong position particularly among Gamers, Tech enthusiasts, Quality of life conscience customers.



Leading Norwegian pure play online retailer, with attractive positions in SE/DK, capitalizing on NO set-up.

Strong position particularly amongst Gamers, Tech enthusiasts, Quality of life conscience customers.



Norway's largest B2B online player in SME/SOHO segment.

Expanding into Sweden.



Distribution business with number of A-brands and attractive partner.

Expanding into Sweden.

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# Vision, mission values



## Vision

**To be “the obvious choice”.** This expresses how Komplet Group would like to be perceived and where we are heading. Our vision provides guidance and energy. Each and every day, we strive to be “the obvious choice” for customers, suppliers and employees, and for the community around us.



## Mission

To develop complete solutions that **make life simpler.**



## Values

Our values are fundamental to our corporate culture. Our values tell us how to work, how to treat each other, and (not least) how we are perceived by the world around us.

**PRECISION.** Keep our promises, meet deadlines, keep up, be clear and accurate. Have respect for and confidence in each other.

**SIMPLICITY.** Think smart, find simple solutions. Make life easier for our customers and ourselves.

**ENTHUSIASM.** Get involved and wish each other well. Create enthusiasm and gain pleasure from our work.

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# Our growth journey

2021 was an exciting year for Komplet, culminating with the listing on the Oslo Stock Exchange in June. The listing was an important step for our continuous growth.

Komplet was previously wholly-owned for ten years by Canica, one of the largest privately-owned investment companies in Norway. Canica is still the largest investor with 59.9% ownership alongside several other shareholders.

Another important milestone for Komplet Group this past year was the acquisition of Ironstone Holding AS also in June. The cloud technology and IT services offered by Ironstone fits strategically well with Komplet's extensive customer base, and we are very excited to welcome Ironstone and their twenty employees to the Komplet family. Data from Ironstone has not been included in this



sustainability report, however our aim is to fully integrate Ironstone insight into our sustainability records in 2022.

#### PRODUCTS AND CUSTOMERS

Our product range comprises more than 35,000 items including the latest computer components, PCs, household electronics, and other computer-related products. We feature the main brands, carry the latest products and make it easy for our customers to compare prices and models.

Every year we assemble close to 40,000 PCs; each model is tailored to customer specifications and provides the latest technologi-

es. The various web stores allow customers to choose their own components using the online Komplet PC builder.

At the end of 2021, the web stores had a total base of 3,658,831 orders. The group sales surpassed 11 billion NOK, to end-users businesses, schools, public enterprises, and wholesalers across Scandinavia. This was an increase of 11.9% compared to 2020. The company positions itself as the direct link between manufacturers and customers, providing efficient operations and highly competitive prices. In 2021, we served a total of 1.6 million customers in Scandinavia.



Another important milestone for Komplet Group this past year, was the acquisition of Ironstone Holding AS

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# Our 2025 business strategy

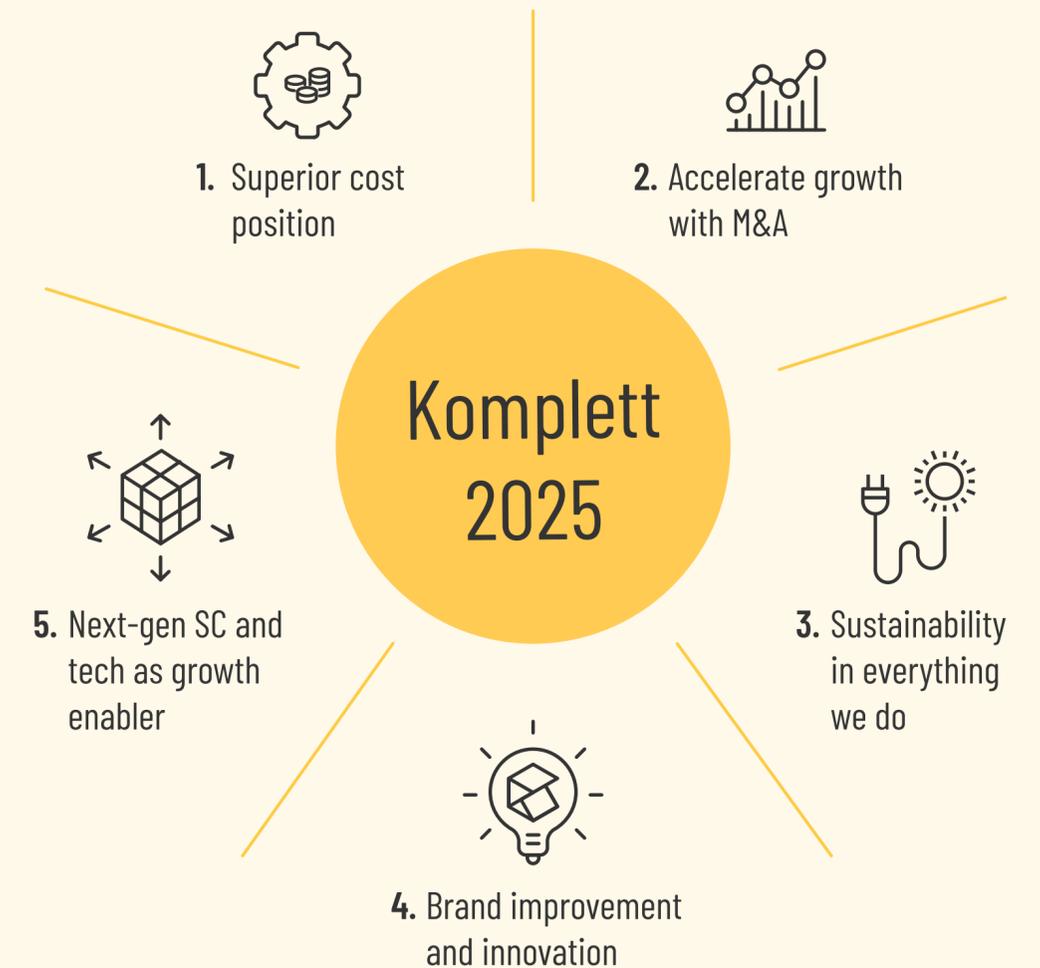
Since 2018, Komplet Group has experienced significant growth, gaining market share across all our brands. Our 2025 business strategy is intended to facilitate future growth and establish Komplet as a leading electronics retailer for the whole Nordic region. We aim to strengthen our core, expand with our customers into new services, and significantly shape the development of the Nordic B2C market.

With the current climate and environmental challenges, we experience increased awareness and expectations from our customers and other stakeholders regarding circular-economy-oriented offerings and the reduction of our climate footprint. In line with our values, we have high ambitions for growing our business responsibly and considering both the environmental and the social aspects of our operations.

Our 2025 business strategy is built on five strategic pillars; one of these is to promote sustainability in everything we do. In 2020, after analyzing our operations and potential for growth over the next three years, we defined a new sustainability plan based on

the principle of Enjoyable Product Lifecycles. Emphasis has been placed on developing the areas within sustainability that we believe will have the most impact on our business and on our stakeholders. We aim to develop new circular business concepts and provide green outbound logistics. These new services and solutions will help us engage with new customers who share our desire to live and consume more responsibly, thus positioning us to reach our goals of increasing our market share in the different Nordic countries.

More information on our business strategy for 2025 can be found in our Annual Report.



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Our 2025 business strategy is built on five strategic pillars; one of these is to promote sustainability in everything we do.

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# Economic value generation and distribution

Since 2018, Komplet Group has experienced significant growth, gaining market share across all our brands. Our 2025 business strategy is intended to facilitate future growth and establish Komplet as a leading electronics retailer for the whole Nordic region. We aim to strengthen our core, expand with our customers into new services, and significantly shape the development of the Nordic B2C market.

Komplet Group's growth and success have positive economic ripple effects beyond our own business. Through our business activities, Komplet stimulates economic growth by creating employment, increasing governmental revenue and distributing capital to shareholders. It is important for Komplet to be open and transparent about our financial activities, expenses, and government payments.

Taxes are a key mechanism by which organizations contribute to the economies of the countries in which they operate, i.e. Norway and Sweden for Komplet Group. This year,

we report the various tax categories paid country-by-country with the aim of indicating our scale of activity and the contributions we make through taxation in each jurisdiction. It is fundamental for us to live up to our obligation to comply with tax legislation and to adhere to good tax practices.

Disclosures on the creation and distribution of economic value, presented in the table below, provide a basic indication of how Komplet contributed to value creation for stakeholders in 2021.

KOMPLETT GROUP 2021	
<b>ECONOMIC CONTRIBUTION</b>	
Purchased goods and services	9,581 million NOK
Profit (ex. tax)	300 million NOK
Operating costs	453 million NOK
Salary (and other compensation) to employees	511 million NOK
<b>ENVIRONMENTAL TAXES</b>	
Water and sewage	93,000 NOK
Electricity fee	5 million NOK
<b>TOTAL TAX AND PAYMENTS TO GOVERNMENT</b>	
<b>NORWAY</b>	
Corporate tax	48 million NOK
MVA	567.7 million NOK
Employee withholding tax	74 million NOK
Employer tax	34.6 million NOK
<b>SWEDEN</b>	
MVA	302.2 million SEK
MVA (Denmark)	90.3 million SEK
Employee withholding tax	4.1 million SEK
Employer tax	3.6 million SEK
<b>COMMUNITY INVESTMENT</b>	
Sponsor funds	45,000 NOK
<b>FINANCIAL INVESTMENT CONTRIBUTION</b>	
Investments (Capex)	56 million NOK
Dividends to owners	2.9 NOK per share

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Every year, employees of Komplett Group can apply for funds that are to be distributed to good causes within local culture and sports.

In 2021, Komplett paid a total of 616 million NOK and 392 million SEK in taxes to the Norwegian and Swedish governments. Employer tax amounted to approximately 34.6 million NOK and 3.6 million SEK. Environmental taxes relating to the use of water, sewage and electricity paid to the Norwegian government totaled 5.9 million NOK. Our profit after taxes was 300 million NOK.

Property, plant and equipment investments in 2021 totaled 56 million NOK and included investments in IT and supply chain projects. Dividends of 2.9 NOK per share were paid by Komplett Group to its shareholders in 2021. The complete details of our financial information can be found in our Annual Report.

As a visible actor in the local community – especially in Sandefjord, where Komplett was established over 25 years ago – we want to contribute to a healthy and thriving community

through community investments. In the period between 2010 and 2021, Komplett donated 746,000 NOK to charitable causes through our sponsor fund “Sponsoratet”. Every year, employees of Komplett Group can apply for funds that are to be distributed to good causes within local culture and sports, and that will not be given to individuals. The funds will be used for activities that create enthusiasm and support the community. The distribution of these funds also takes place annually.



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# Board of directors



**Nils Kloumann Selte**  
*Chair*

Nils Kloumann Selte has held the position of chair of the board since 2014. He is the Chief Executive Officer of Canica AS, where he previously served as Chief Financial Officer. Selte also serves as a board member for Orkla ASA and Arcus ASA.



**Jennifer Geun Koss**  
*Board Member*

Jennifer Geun Koss has been a board member since 2020. She currently holds the role of Founding Partner at investment fund Springbank Collective. She is the founder of the retail agency BRIKA. Koss holds various other board positions.



**Lars Bjørn Thoresen**  
*Board Member*

Lars Bjørn Thoresen has been a board member since 2019. He has years of directorial experience, from serving as chair and board member of various private and public companies, and is also the CEO of the investment company LT Invest.



**Jo Olav Lunder**  
*Board Member*

Jo Olav Lunder has been a board member since 2018. He has more than 25 years of broad directorial and executive experience, from multiple private and public companies within telecommunications, IT services, business solutions, and e-commerce.



**Sarah Willand**  
*Board Member*

Sarah Willand has been a board member since 2021. She is currently Organization and Communications Director at TV2, and holds various board positions at companies such as RiksTV AS and Norges Televisjon AS.



**Carl Erik Hagen**  
*Deputy Board Member*

Carl Erik Hagen has held the positions of board member and deputy board member since 2013. He currently works in the financial investment arm of Canica International, and is an active board member for Canica, through several board positions within the Canica Group.



**Nora Elin Eldås**  
*Employee Representative*

Nora Elin Eldås joined the Group in 2016, as a salesperson at Webhallen AB in Täby, Sweden, and has been a board member since 2021. Eldås currently holds the position of Store Manager at Webhallen AB Fridhemsplan in Stockholm.



**Anders Odden**  
*Employee Representative*

Anders Odden joined the Group in 2007, as Nordic Product Manager for PC Components, and has been a board member since 2018. He currently holds the position of Sales Director at Komplett Group.

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# Executive management team



**Lars Olav Olaussen**  
*Chief Executive Officer*



**Krister A. Pedersen**  
*Chief Financial  
Officer*



**Trine-Lise Jensen**  
*Chief Information Officer  
and Chief Operating Officer*



**Kristin Hovland**  
*Head of Communications  
and Advisor to the CEO*



**Kristin Hodal Torgersen**  
*HR Director (Interim)*



**Kjetil Wisløff**  
*Category and  
Buying Director*



**Jon Martin Klafstad**  
*Director B2C (Interim)*



**Jan Erik Svendsen**  
*Director B2B & Integra  
(Interim)*



**Henri Mikael Blomqvist**  
*Managing Director Webhallen*

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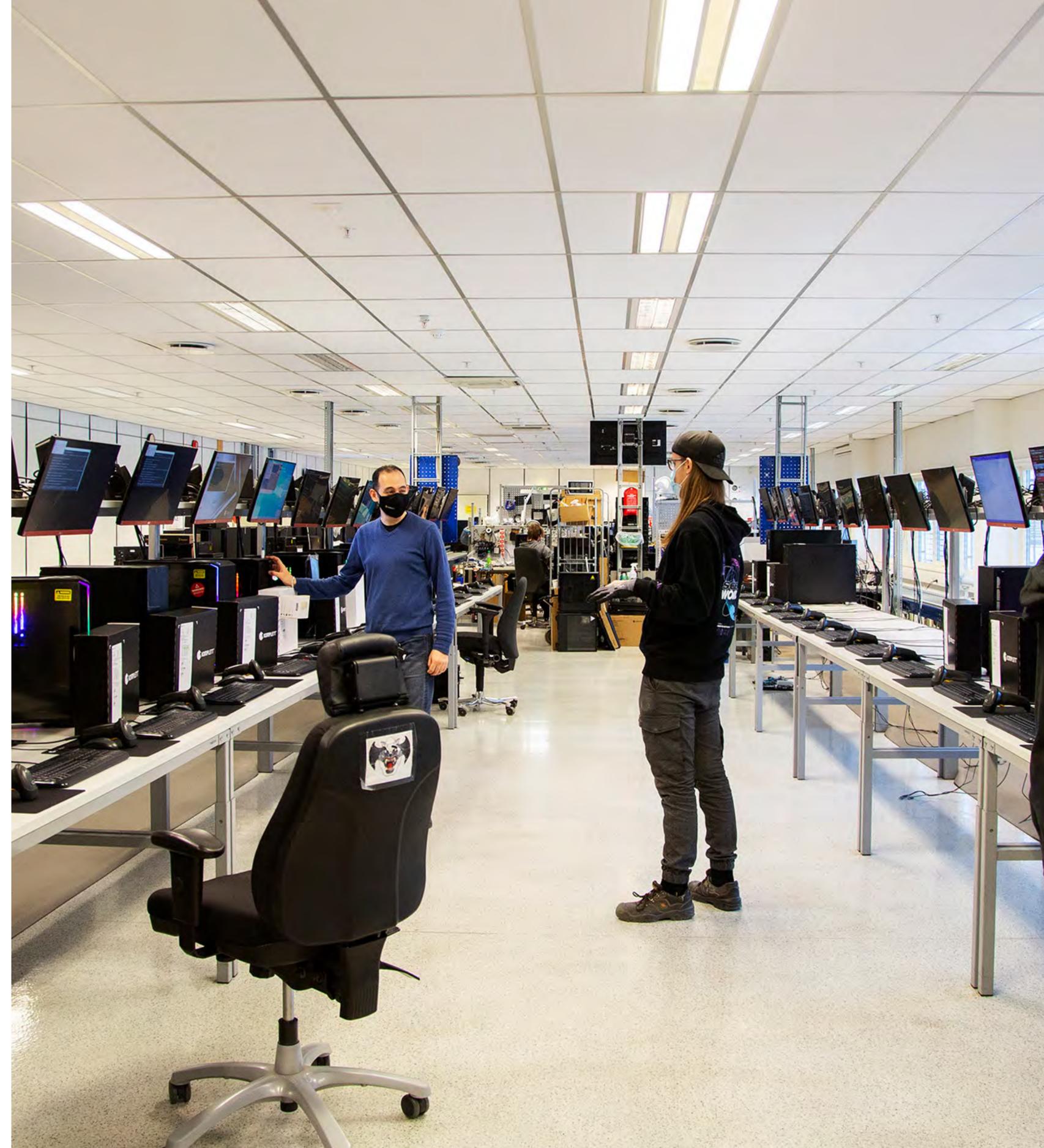
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# Sustainability at Komplet

As Komplet continues to grow and develop, we strive to ensure that our business is aligned with safeguarding both the environment and the people impacted by our operations. To lead the way in making the electronic retail business more sustainable, we must adapt our operations to comply with new regulations and new expectations from our customers.

Ensuring that sustainability is part of everything we do is one of the pillars of Komplet's business strategy, and 2021 was the year we started implementing the actions of our sustainability plan. Our initiatives are gradually becoming integrated into our everyday business operations, as we aim to have a positive impact on the communities around us. We seek to contribute to creating a more just and green society for all. By adapting and improving the footprint of our operations today, we will ensure that Komplet as a business thrives in the future.



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# Our sustainability pillars



## Komplet Circular



## Komplet Tolerance



## Komplet Environment

What it is

What we will do

What it will take

Komplet Circular is our path for developing new and circular business concepts, focusing on recycling, durability and reusability.

A special emphasis is put on minerals and materials used in electronics that have significant environmental footprints. We aim to develop methods for salvaging these resources so that they can be reincorporated into the lifecycle of electronic products.

- Strive to increase the durability and reusability of everything we sell.
- Ensure that products purchased from Komplet will consist of more recycled materials.
- Create solutions for customers to easily choose repairment or reuse electronic devices.
- Establish longer warranties, upgrade solutions, and further enhance our buy-backs and leasing options.

Invest in developing new services to promote increased recycling and reuse of products. In addition, improve management of these initiatives by implementing tools and systems for easy handling.

Strengthen our service- and circularity-oriented business models and promote the importance of circularity to our customers and suppliers.

Komplet Group is committed to creating and upholding a healthy workspace where our employees feel included and valued. Another important part of our tolerance strategy is the work to better document and demand decent work standards among our suppliers. Further, a focus area within the tolerance path is to promote digital inclusion in all parts of society.

- Foster an inclusive work environment by developing and caring for our employees.
- Promote digital inclusion in all areas we are present.
- Develop a complete overview of our value chain – tending to people and resources at all levels.

Initiate mechanism for measuring and managing the level of employee satisfaction and wellbeing at all levels of our operation.

Implement procedures to improve transparency in our value chain, in addition to securing cooperation with suppliers on this issue.

Promote digital inclusion by creating awareness on this important topic, enter partnerships, and arrange fundraisers together with suppliers and customers.

The Komplet Environment principle aims to guide us toward decreasing the environmental impact of our operations. This commitment is focused on reducing GHG emissions associated with the transportation of our products. We intend to offer zero-emission deliveries to all customers by 2026.

- Map, document, and limit our emissions through several environmental programs and ISO certifications.
- Cooperate with suppliers to find transportation solutions with a reduced climate footprint.
- Guide our customers towards more environmentally conscious products.

Continue to map and monitor our GHG emissions closely. Cooperate with our suppliers to find the most effective and environmentally friendly transportation solutions. Prioritize suppliers committed to reducing GHG emissions, and push our existing partners towards this goal.

In case of no CO<sub>2</sub> reduction, offsetting emissions would cost 0.7-1.7 million NOK.

Promote sustainable products in our inventory.

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# Sustainable Development Goals

In the course of the development of our sustainability plan in 2020, we identified five of the seventeen sustainable development goals (SDGs) Komplet্ট contributes to solving, and with which Komplet্ট has had challenges. The SDGs are important guidelines that highlight the challenges that face society but also promote solutions going into the future.

The following highlighted goals are those that are most relevant for our operations and where we have a significant social or environmental impact, both in our own organization and throughout our value chain. In 2022, we will strive to further develop our work with the SDGs by prioritizing key SDG sub-goals and linking them to our targets and actions.



## SDG 12 RESPONSIBLE CONSUMPTION AND PRODUCTION

In our work with SDG 12, and the essence of Komplet্ট Circular, we strive to contribute to increased reuse, repair and sustainable handling of electronic products. Electronic waste is a massive international challenge, which Komplet্ট must contribute to minimizing. Many electronic components are highly dependent on minerals that are scarce, and that will be increasingly required. This is another reason we must work with our partners to develop solutions to increase the recycling and recovery of these scarce minerals. Komplet্ট acknowledges that there are many challenges connected to the production of electronics, and we strive to secure responsible consumption and production of all our products to reduce our material footprint.



## SDG 8 DECENT WORK AND ECONOMIC GROWTH

To consolidate and communicate our commitment to secure decent work conditions and the safeguarding of fundamental workers' and human rights, both in our organization and throughout our value chain, we emphasize SDGs 8 and 10. A priority is to improve our systems for performing due diligence assessments, to control the impacts of our business through our suppliers, especially those relying on labor in regions with a high risk of human and labor rights breaches. Through this work, we can contribute to reducing both regional and global inequality and push for better work and economic conditions for all workers impacted by our value chain.



## SDG 10 REDUCED INEQUALITIES



## SDG 5 GENDER EQUALITY

As we operate within what is seen as a typically male-dominated sphere, with our main activities being warehouse-related, SDG 5 is a priority for Komplet্ট Group. To meet the challenges that may arise from this imbalance, we work wholeheartedly to secure equality at all levels of our business. Our priorities are to recruit and retain female employees as well as ensuring that all our people are treated fairly, both in opportunities and remuneration, and that they feel secure and protected from discrimination and harassment.



## SDG 13 CLIMATE ACTION

We consider it crucial to focus on SDG 13, as our operations contribute to GHG emissions, largely from the transportation of goods. It is therefore important for us to map our current climate footprint and initiate measures that reduce our emissions in the coming years.

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# Materiality and stakeholder dialogue

As part of the development of our sustainability strategy in 2020, we performed a materiality assessment, identifying the most important topics for Komplett and our stakeholders. In 2021, we have further mapped where our material topics are most pressing to gain insight into our broader impact. Komplett is a company that is in continuous development; in addition to navigating an increased landscape of regulatory ESG requirements, we see the need to annually assess, both our main priorities within sustainability and their impact. In 2022, our materiality assessment will be revisited and updated to reflect the changes in the markets we operate, the concerns of our stakeholders, and our impact on both social and environmental conditions.

Open and honest dialogues with our stakeholders – through day-to-day interactions, customer surveys, employee surveys, social media inquiries, and critical feedback from investors – lay the foundation for insight into our prioritized areas of sustainability. As part of our materiality assessment in 2020, we also conducted interviews with several members from each stakeholder group. Going forward, we plan to expand our work towards important stakeholders and to develop a plan for a structured annual stakeholder dialogue. The table to the right summarizes their main concerns.

## Our stakeholder's main concerns



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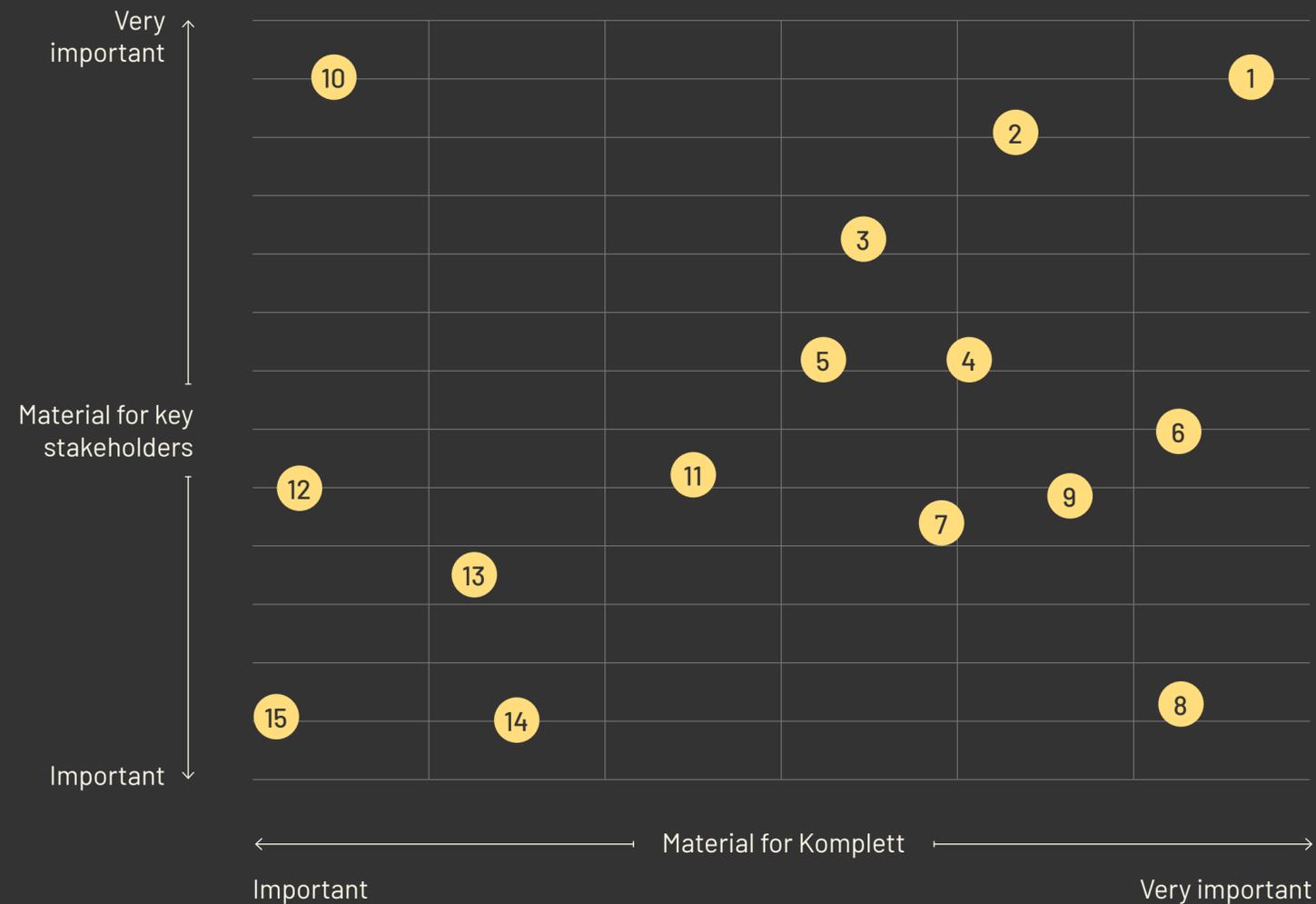
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# Materiality assessment



1. Circular business concepts
2. Sustainable packaging
3. Innovative solutions with partners
4. Circular value chain
5. Zero emissions logistics
6. Responsible supply chain
7. Competence development
8. Inclusive workplace
9. Climate impact
10. Digital inclusion
11. Sustainable products
12. Renewable energy
13. Business ethics
14. Employee health
15. Community engagement

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# Our value chain and key sustainability impacts

	 Producer	 Sourcing	 Warehouse	 Sales	 Packaging	 Logistics	 Customer	 End of line
1. Circular business concepts	Significant Impact	Significant Impact	Impact	Significant Impact	Significant Impact	Impact	Significant Impact	Significant Impact
2. Sustainable packaging	Significant Impact	Significant Impact	Impact	Impact	Significant Impact	Impact	Impact	Impact
3. Innovative solutions with partners	Significant Impact	Significant Impact	Impact	Impact	Impact	Significant Impact	Impact	Impact
4. Circular value chain	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Impact	Significant Impact	Significant Impact	Significant Impact
5. Zero emissions logistics	Impact	Significant Impact	Impact	Impact	Impact	Significant Impact	Significant Impact	Impact
6. Responsible supply chain	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Impact	Impact	Impact	Impact
7. Competence development	Impact	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Impact	Impact	Impact
8. Inclusive workplace	Impact	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Impact	Impact
9. Climate impact	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Impact	Significant Impact
10. Digital inclusion	Impact	Impact	Impact	Significant Impact	Impact	Impact	Significant Impact	Impact
11. Sustainable products	Significant Impact	Significant Impact	Impact	Impact	Impact	Impact	Impact	Significant Impact
12. Renewable energy	Impact	Impact	Significant Impact	Significant Impact	Impact	Significant Impact	Impact	Impact
13. Business ethics	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Impact	Significant Impact	Significant Impact	Impact
14. Employee health	Impact	Significant Impact	Significant Impact	Significant Impact	Significant Impact	Impact	Significant Impact	Impact
15. Community engagement	Impact	Impact	Impact	Impact	Impact	Impact	Significant Impact	Impact



**Komplett Circular**  
We will contribute to a circular economy



**Komplett Tolerance**  
We will take care of people at all levels of our value chain



**Komplett Environment**  
We will reduce our emissions

**IMPACT:**

	Significant Impact
	Impact

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# Corporate governance

The way our companies are governed is vital for value creation and achieving sustainable profitability. Komplet Group relies on stable and efficient organizational structures, routines, and management mechanisms to ensure the good functioning and progress of our companies.

To secure good corporate governance, we have adopted a set of governance documents setting out principles for how our business should be conducted. All shareholders and employees are responsible for following Komplet Group's regulations and ethical principles. We strive to ensure good and healthy business practices, reliable financial reporting, and an environment of compliance with applicable legislation and regulations.



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# Governance

The CEO is responsible for the company's business development, as well as leading and coordinating day-to-day operations in accordance with the instructions and decisions of the Board of Directors (BoD).

The BoD decides, at its meetings, on the company strategy and it reviews progress. Once the strategy is decided, the CEO and the group management are responsible for its implementation. All divisions in Komplet Group are represented in the group management, and all divisions have their own local management.

When honoring the company's corporate governance policy, the BoD and executive management shall contribute to achieving the following core objectives.

- **Transparency.** Communication with the company's shareholders, stakeholders and other interest groups shall be based on transparency and openness on issues relevant to the evaluation of the development and position of the company.
- **Independence.** The relationship between the BoD, executive management, and shareholders shall be based on indepen-

dence principles. Independence shall ensure that all decisions are made on an unbiased and neutral basis.

- **Equal treatment.** A fundamental objective for good corporate governance is equal treatment and equal rights for all the company's shareholders.
- **Control and management.** Sound control and corporate governance mechanisms shall contribute to predictability and reduce the level of risk for the company's shareholders, stakeholders, and other interest groups.

The development and improvement of the company's corporate governance principles are ongoing. In the coming year, we will re-visit the management system established through our strategy process in 2020 to ensure that all members of our executive management team are held responsible for securing progress.



#### RISK MANAGEMENT

Risk management is part of the annual steering wheel for Komplet Group. The purpose is to identify and document the most important risk areas that can potentially threaten the business, its goals and its objectives. The risk assessments are conducted on both group level and per segment, including risk exposures for all business units. Key risk areas identified and the associated mitigating actions are reported and discussed annually with the BoD.

The main areas identified in the 2021 risk assessment for Komplet Group were: the potential shortage in product availability driven by the global shortage of electronic components and microchips; lower growth in consumer markets as a post-effect of Covid-19; increased competition; and cyber security. Mitigating actions for each of the identified risks are monitored on a regular basis, and the risk assessment will be reviewed in 2022.

#### GROUP POLICIES

Several group policies are available on the company's intranet sites, including guidelines for delegation of authorities, the employee handbook (including country-specific versions), ethical and harassment guidelines, the General Data Protection Regulation (GDPR) policy, guidelines for remuneration of executives, and more.

In addition, each department and subsidiary within the group has established relevant management systems and processes according to local legislation and practice.

Komplet Group operates within well-known standards for quality and environmental management, and we are certified according to ISO 9001 and ISO 14001.

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# Business conduct

It is crucial for our Group to comply with and promote ethical business conduct across our organization. We must take precautions and active steps to make sure that no operations connected to our business are entangled in fraud or corruption. To achieve this, we must also follow up and manage our supply chains and ensure compliance with our code of conduct which covers human rights, workers' rights, the environment, and corruption. Komplet's code of conduct covers regulations and requirements for the following:

- Upholding local and national requirements
- Decent labor conditions
- No use of forced and/or child labor
- Freedom of association and collective bargaining
- Corruption
- Protection against discrimination, and personal integrity
- Wages and working hours
- Health and safety standards
- Management systems

In 2021 we started the work of reviewing and updating our code of conduct to match our increased sustainability standards and commitment to environmental protection as well as new regulations concerning due diligence and transparency. The update will be finalized and approved by our BoD in 2022.

Importantly, the updated code of conduct states clearer standards and expectations on activities affecting the natural environment, including GHG emissions, land use and waste management. The improved code of conduct will also put more emphasis on expectations for business integrity and anti-corruption measures as well as the importance of managing and monitoring suppliers.

An important aspect of the renewal of our code of conduct is to integrate standards and obligations for our companies and their suppliers to comply with the expectations and regulations of the Transparency Act which will come into force in Norway in July 2022. In addition to our code of conduct, employees and suppliers can find information and guidance about our standards and procedures for ethical business conduct in our manual for ethical principles and guidelines for communication available on our intranet. During their onboarding, new employees are presented with Komplet's standards for business conduct.

#### **ANTI-CORRUPTION**

Komplet is committed to complying with anti-corruption laws and regulations and to conducting our business activities openly and transparently, thus supporting efforts to fight corruption worldwide. Corruption undermines legitimate business activities, distorts competition, jeopardizes reputations, and exposes companies and individuals to great risk. We include guidance on anti-corruption in our

employee ethical guidelines, and any violations of these can lead to termination of employment. Development of new manuals and training programs for anti-corruption is planned for 2022. Further, plans to update our anti-trust and anti-corruption manual have been established.

Employees are encouraged to report any possible violations of laws and regulations, or possible violations of Komplet's corporate social responsibility policy, in accordance with established whistle-blower routines. Violations can be reported anonymously, and alerts are protected from retaliation. In 2021 there were no reported cases of breaches of business conduct or corruption.

#### **ANTI-COMPETITIVE BEHAVIOR**

In 2020, Komplet developed a manual with guidelines on anti-competitive behaviour. This manual started rolling out throughout the organisation in 2021, and relevant personnel will receive training on the topic. The work will continue in 2022. Komplet has not had any confirmed or reported cases or legal action for anti-competitive behaviour, anti-trust or monopoly practices in 2021.

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# Customer privacy and product safety

## PRIVACY AND DATA PROTECTION

Komplett is committed to protecting the privacy rights of our employees and of everyone with whom we do business, especially our customers. Personal data is only used for appropriate purposes, and processed in accordance with binding rules set forth by the EU's GDPR that came into effect in 2018.

Our management team takes very seriously the risks connected to data security. Most of our IT operations are outsourced, meaning that external suppliers manage our computer systems. Strict requirements established through data processor agreements are in place for all suppliers with specific instructions to follow up on, and regularly report on, safety risks. Komplett conducts random sampling, audits reports, and if necessary, orders safety tests from external independent suppliers.

An e-commerce platform has been developed with instructions for how developers should assess privacy, and the need for the storage of personal data, when developing new systems. A contingency plan has been prepared which is to be used in the event of serious incidents. Further, a separate routine is in place in the event of a breach of personal data security. In 2021 we had no substantiated complaints concerning breach of customer privacy, or loss of data.

Information is collected via Google Analytics for online visitors; presently, it is not possible to opt out of this. However, other cookies and tracking pixels, e.g. for Facebook and personalization, must be accepted by the visitor. In 2021,



131,641 customers accepted the collection of customer information for secondary purposes. Furthermore, 7% of active accounts consented to cookies. The use of marketing cookies was approved by 78,595 visitors, and 78,677 approved personalized cookies.

Regarding newsletter subscriptions, Komplett Bedrift's blog currently has 5,000 subscribers registered, while 61% of active accounts have signed up for the Komplett Club. Everyone who receives an email regarding a blog or newsletter has signed up voluntarily. Through personalized "My Pages" on all our online stores, customers can change their preferences at any time.

## PRODUCT SAFETY

Every day we work hard to meet our customer's needs. This includes product quality and product mix as well as service and support. All our products undergo health and safety evaluations, and are required to comply with all relevant laws

and regulations before being launched on our websites and stores. Continuous improvement of processes, and constant competence development are high on our agenda in order to meet customer, regulatory and internal quality requirements.

Komplett had no non-compliance incidents concerning the health and safety impacts of products in 2021. During the year, we reclaimed two products from our private label due to incidents reported by customers where the products had malfunctioned. Both incidents were connected to overheating and the products were collected for testing. The incidents were handled according to our procedures for product quality and safety. The examination concluded that the incidents were caused by defects in the individual product. Therefore, the products were not removed from our product lines. However, we take these incidents seriously and follow them up very carefully.

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# Supply Chain Engagement

Our operations depend on several suppliers, and our value chain consists of both national and international producers. Improving our value chain mapping is essential to ensure sustainable practices and decent work conditions among all our suppliers.

Through continuous dialogue, we cooperate with both material and product providers and delivery services to ensure that business conduct, quality, and health, safety and environment (HSE) standards are upheld.

In 2021, Komplet Group worked with over 570 suppliers. Based on revenue, the most popular product categories in 2021 were computer components, handheld accessories, and PCs. Gaming is a category that is important for us and our customers; sales have expanded in other categories, such as peripherals, brown goods, and white goods & home.



## Number of suppliers per category\* +

	2021	2020
Gaming	186	83
White goods & Home	166	114
Hand held accessories	129	121
Components	77	86
Brown goods	74	61
Peripherals	65	78
PC	17	30

*\*Suppliers present in multiple categories*

## Top 10 suppliers based on revenue +

1. Samsung
2. Apple
3. Asus
4. Iiglo
5. Lenovo
6. Corsair
7. HP
8. Philips
9. Sony
10. Logitech

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#### PRIVATE LABEL

Our private label lines and products continue to grow in popularity among our customers. Currently, we offer carefully selected private label products under the brand names Svive, Iiglo, Intono, Kameleon, Komplet PC, 3241, and Protech, which is a sub-brand of 3241. These products are sourced through our trusted sourcing partners F&H, CBK and Calisto.

Strict procedures and routines are in place for sourcing from our partners, in the selection of products and to ensure product quality. Komplet has initiated a project to further monitor sourcing partners by performing audits on compliance to standards and requirements established in our code of conduct and in the EU's Registration, Evaluation, Authorization, and Restriction of Chemicals regulations. This compliance project is at a starting phase and will be strengthened in the coming year with the implementation of the management system, 4human TQM. This new system provides us with a platform for managing our suppliers and ensuring that we uphold routines to discover and manage potential breaches.

Our product line consists of 1790 products within gaming, office and accessories, HiFi, high-performance laptops and custom-build PCs. In 2021, we introduced 234 new products, while 9 products were removed from our product portfolio. Most of our private label products are sourced from China. One supplier also produces at a factory in Poland.

Improving the efficiency of the transportation and packaging of our private label products is a high priority, as we aim for the private label lines to be highly sustainable. For example, we strive to reduce plastic packaging and consolidate our transport to reduce emissions, and our suppliers are also in the process of implementing new procedures to calculate and reduce transport emissions.

#### OUR JOURNEY TO SECURING TRANSPARENCY

We cooperate with partners, suppliers, and other businesses that maintain a high ethical standard and pursue good bu-



business practices. All purchases must follow our suppliers' code of conduct and vendor agreement, and we require our partners, our suppliers, and their sub-suppliers to comply with these standards. Upon our request, our partners or suppliers must provide documentation on their compliance with our code of conduct and their implementation of our standards. If breaches are discovered, the supplier must take immediate action or the purchase agreement will be terminated.

As mentioned above, we are in the process of adopting an updated code of conduct that was developed in 2021. This new code of conduct will establish higher requirements for our suppliers and our own companies to conduct due diligence analysis and report on risks and violations in the supply chain.

With the enforcement of the newly established Transparency Act in Norway, we continue to focus our efforts on increasing transparency and overview at all stages of our value chain to safeguard the people who are impacted by our business.

Complying with the standards put forth in the new law is of great importance to our business. The organization is currently preparing for increased human rights due diligence from our suppliers. New systems for audits and visits to factories must be established and implemented during the first half of 2022 to fulfill our due diligence and transparency obligations. To secure the necessary progress, we will engage external consultants to assist in the establishment of new procedures.

The new regulation requires considerable work for our management team and our organization at large; however, we consider it a necessary contribution to ensuring that human and labor rights are respected and upheld in our entire value chain. Performing this exercise in a structured manner provides us with an opportunity to improve the risk analysis of our supply chain.

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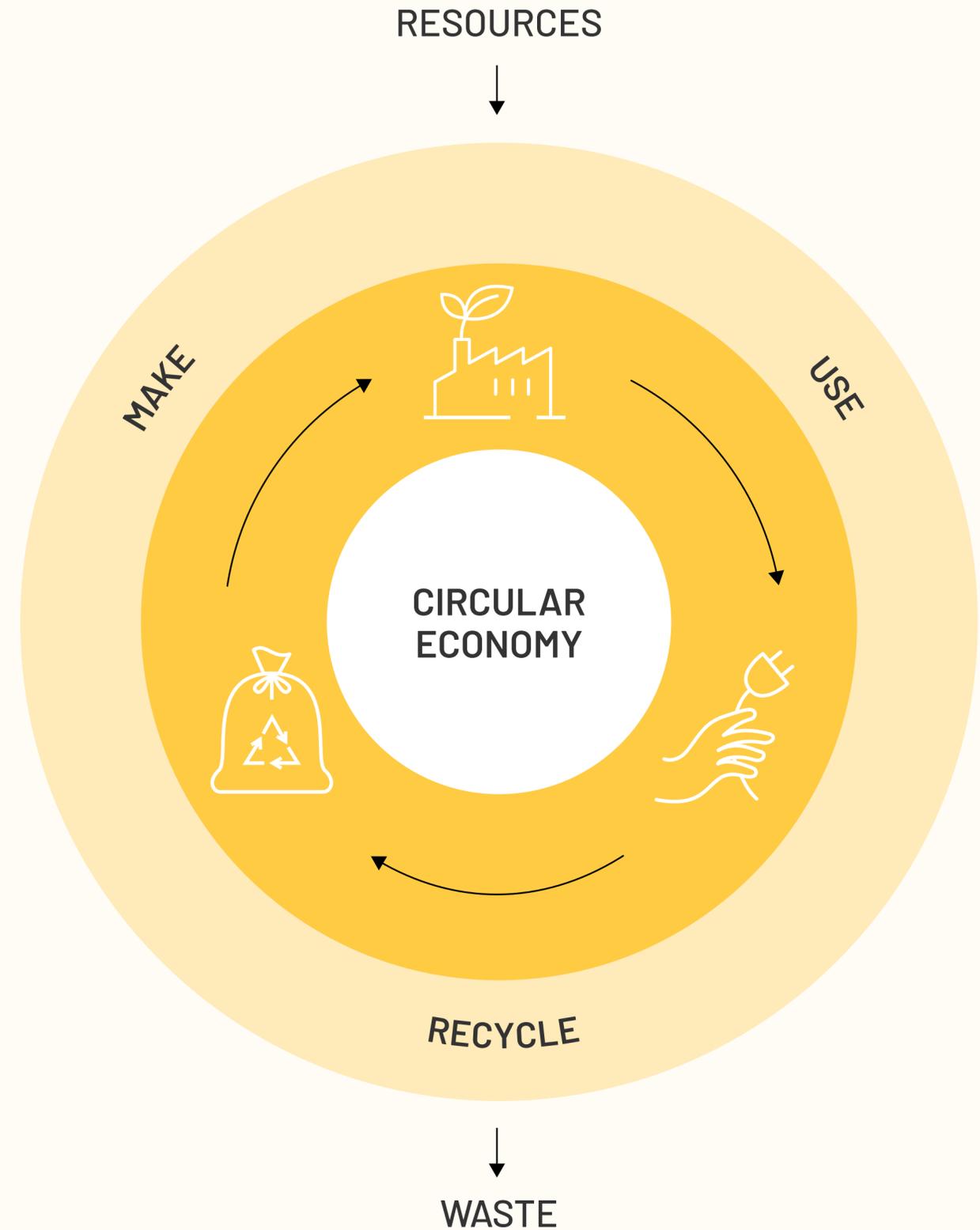
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# Komplett Circular

Our customers love electronics, and they constantly buy new products both privately and at work. We know that there are several sustainability challenges associated with electronics, such as resource scarcity, the environmental footprint of resource extraction, and hazardous components that must be recycled safely.

Unfortunately, a lot of electronics are still not recycled. However, with the challenges of mineral use and waste also come great potential and opportunities. Some materials, such as gold, can be recycled up to 100 times. These materials are important resources that must be taken care of as part of the electronics life cycle. Therefore, increased recycling of electronic's is an important measure to prevent losing valuable resources. At Komplett, we want to improve our business strategy and operations to salvage these resources more efficiently so that they can be reincorporated into the life-cycle of new electronic products.

As a leading online electronic player, we want to contribute to solving relevant sustainability challenges in the electronics industry. For us, it is important to take responsibility for the lifespan and disposal of our products. We do this by offering circular services, such as "buy-back" and leasing services, and focusing on simplifying the return of e-waste. We have clear ambitions to create a return concept that solves challenges in the return flow, specifically around online shopping.



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# Waste management

At Komplet, we are engaged with recycling as much of our waste as possible. Through our collaboration with Norsirk, we gain valuable insights into our waste management performance and gather ideas for measures to further reduce waste.

Norsirk works to develop new methods of reclaiming more electronics to keep a larger portion of materials in the loop. In 2021, we recycled 90% of our waste, a 0.2% decrease from 2020. We will work to improve this share in 2022.

### ELECTRONIC WASTE

In 2021, Norsirk reported that our sold products represented 2,093 tonnes of the total collected electronic waste. The reported amount of electronic waste is calculated based on Komplet's share of the total of electronic products imported into Norway. This is a decrease of 4%, from 2,215 tonnes in 2020.

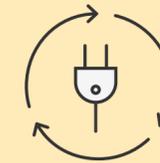
### OTHER WASTE

In 2021, our largest waste fractions were paper and cardboard, wood and general waste. All fractions are recycled, except for

general waste, which is used for energy recovery. Komplet's total waste amount for 2021 was approximately 1,254 tonnes; an increase of 151 tonnes, from 1,103 tonnes, in 2020. This year we managed to get better data on Komplet's own electronic waste, resulting in a large increase from 2020, but a clearer view of the extent. This is handled by Revac AS at their new facility, with a recycling rate of 97%.

Some of our suppliers use Styrofoam as a packaging material to protect their products before they arrive at Komplet warehouses. Through an innovative collaboration with Norsirk, we have been able to reduce the amount of Styrofoam that gets thrown away. Instead of going to waste, we reuse the Styrofoam to package other products. That way, we repurpose the material, and as a result, give it a longer lifespan.

## End of life treatment of sold products



Amount in 2021  
(tonnes)  
**2,093**

Amount in 2020  
(tonnes)  
**2,115**

% Change  
**4%**

Waste fractions	Amount in 2021 (tonnes)	Amount in 2020 (tonnes)	% Change
 Paper and cardboard	688	598	15%
 Wood	378	342	11%
 General waste	122	108	13%
 Plastics	36	33	9%
 Metal and glass	14	18	-22%
 Food waste	5	4	25%
 Electronic waste	5	0.001	-
 Hazardous waste	0.14	0.17	-18%

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# Material use

Komplett uses materials for packaging of products. The most common materials are paper, cardboard and plastics. In addition, we use single-use wooden pallets.

In 2021, we used both renewable packaging material (cardboard and wood) and non-renewable material (plastics). In the cardboard we use, all the raw material is sourced from Scandinavian forests, and the cardboard is produced in Sweden and Germany. Our supplier of packaging materials is certified with the Eco lighthouse environmental management system.

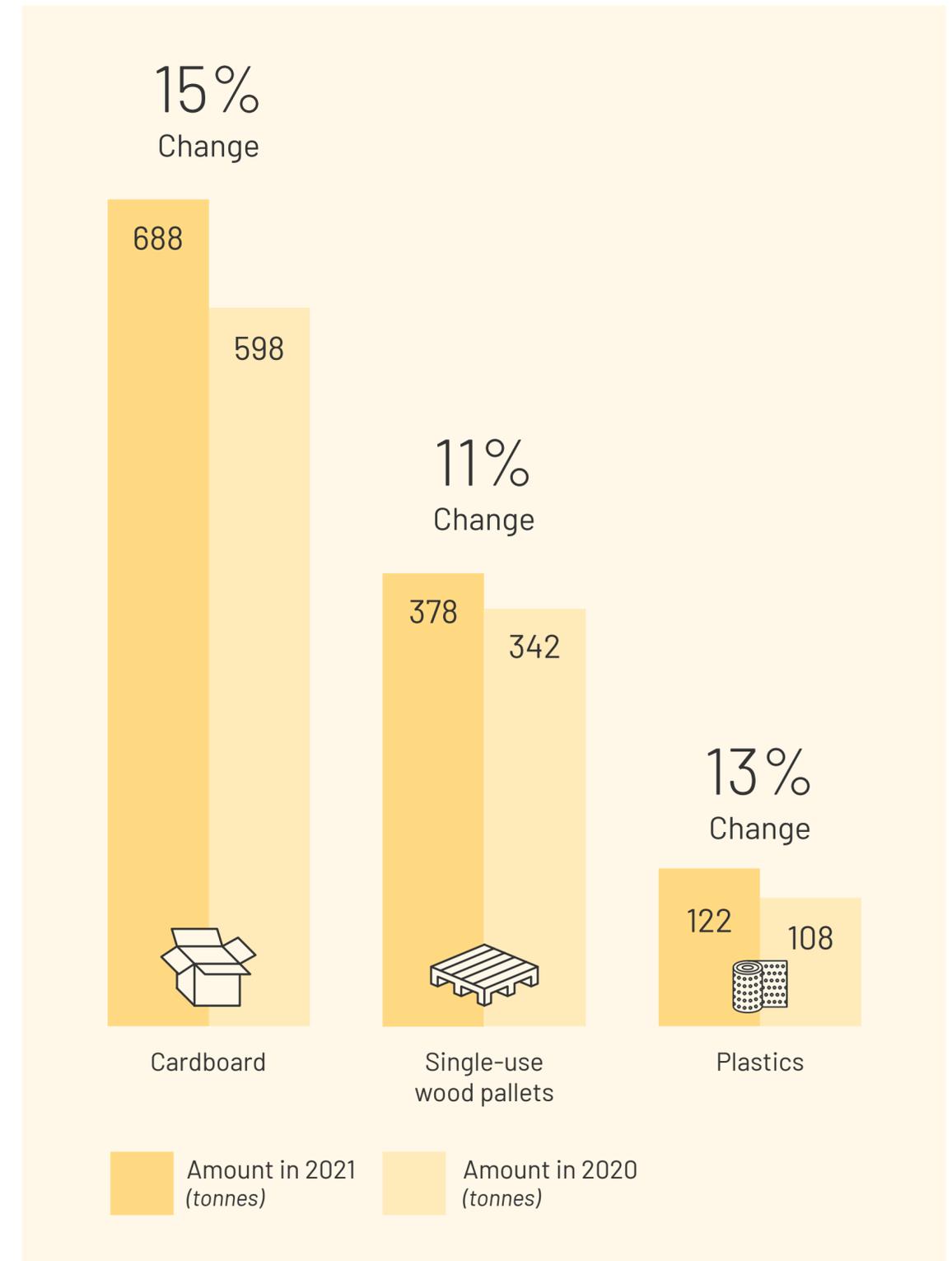
It is an important part of our strategy to reduce material use in our packaging, to use only recyclable materials and to reduce the amount of non-renewable materials. In 2021 we have not been able to reach our targets in reduced material use. The reasons for the high increase in plastics this year are two-fold; an increase in sales volume and the fact that we have refilled our storage of plastic packaging.

### NEW PACKAGING MACHINE REDUCING USE OF CARDBOARD

Almost all of our products are shipped in cardboard boxes, often filled with a large portion of air or with fillers like paper or plas-

tics. So far, all our packaging is based on standardized box sizes, where our system suggests which size to use based on the content of each order. Due to the standardized sizes, the boxes are often larger than the products ordered; they, therefore, use more material and transport volume than necessary. This is a big challenge for effective material use and transport, and a big concern expressed by our customers.

Over the past two years, we have worked to put in place and to test new packaging machines at our warehouse in Sandefjord. The machines have cutters that adjust each box size to every incoming order. When set in motion in Q2 2022, the machines will almost eliminate the need for plastics and paper fillers in our packaging. The reduced sizes will also reduce the need for cardboard, and reduce transport volume. Cardboard is by far the material we use the most, and by installing these new machines we hope both to reduce the use of cardboard substantially and to decrease the need for outgoing transport through more effective packaging.



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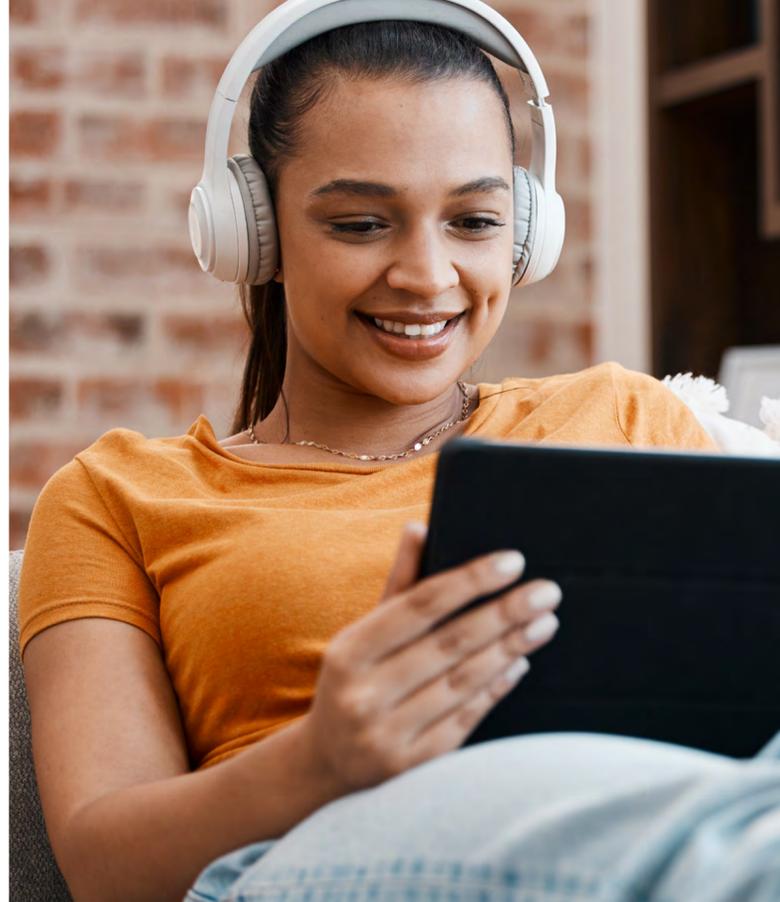
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## Circular innovation and development

Komplett's mission is to make life easier for our customers. In 2021, one of our focus areas for innovation was to find solutions for enhancing recycling of electronic waste from e-commerce. By partnering with actors such as Norsirk and our suppliers, we have developed new ways to efficiently collect electronic waste from our customers.

Consumers in the Scandinavian market are becoming increasingly interested in circular services and products. Komplett has in 2021 launched two concepts that enable leasing of products and buy-backs. These services were developed together with our partners, and we launched pilot projects during 2021.

### FLEX + – a product subscription service

In May 2021, Komplett launched FLEX, a service that enables customers to subscribe for a product for a period of two years and then return it after use. Customers can now choose this service for 1,000 of Komplett's products. This gives Komplett more control over the product life cycle, and makes it simpler for the consumer to dispose of their products. It therefore supports our mission of enjoyable product life cycles. Today, FLEX represents approximately 10% of sales in Norway and Sweden. The aim is to grow Flex to 50% of Komplett's revenue.

In 2022, we will implement a process for the renewal of a FLEX subscription that is already in place. We will, together with our partners, develop and improve the service. Important data and statistics here, for us to review how sustainable the FLEX service is, will be the number of products turned into new products or reused after the FLEX subscription. The FLEX subscriptions are to be renewed starting in 2023. FLEX will also be launched for Webhallen in 2022.

### Revive + – a product buy-back program

Webhallen launched the new buy-back program Revive in Sweden, in December 2021. The service enables a customer to bring their old mobile phone to Webhallen in exchange for a new one. Based on criteria set by Corporate Mobile Recycling (CMR), Webhallen estimates the buy-back value of the phone. This value can be used for new purchases. The first launch was primarily for mobile phones, but the service will open for other products, such as computers, in 2022.

The launch resulted in 198 trades with an average value of 894 SEK. The total product value of the used phones was 177,038 SEK. These phones are bought by the partner company CMR who fix or recycle the products. CMR typically handles 60,000 devices monthly throughout Europe. A potential for the future is to see how this service can be combined with our FLEX model.

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# Plans and aims for 2022

In 2022, we will continue to identify and test how we can contribute more to closing the material loop with full product lifecycles. We will build upon our FLEX service, towards our aim of 50% of sales. This way, we will gain more control over the full lifecycle of the products. With that said, we must work more closely with our suppliers and partners in this to gain oversight over whether and how products returned are given a new life.



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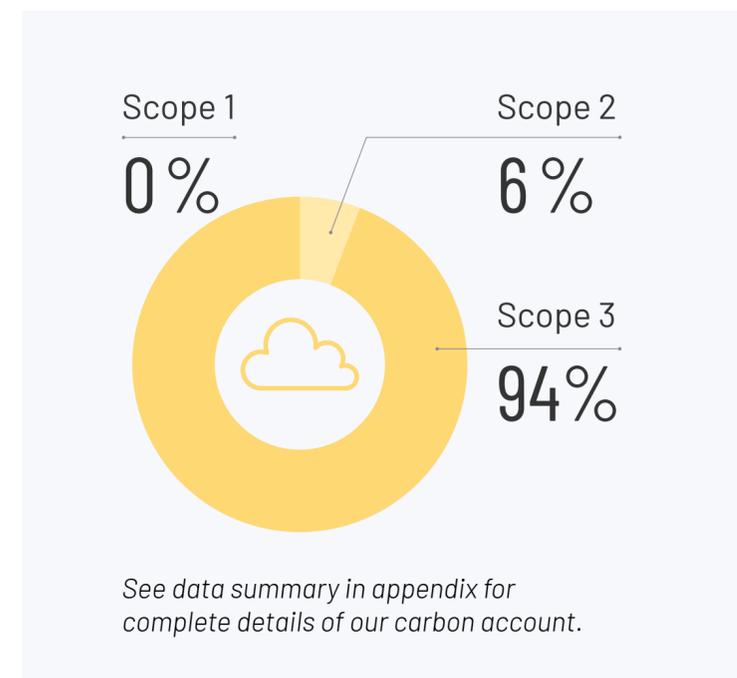
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# Komplett environment

The transformation into a low-carbon society provides Komplett with challenges; but also with opportunities for business development. Our products and services shall be developed to be in line with our customers' needs and expectations, as well as with demands from regulators and investors. Working through our strategic principle, Komplett Environment, we have high ambitions of reducing our climate footprint.



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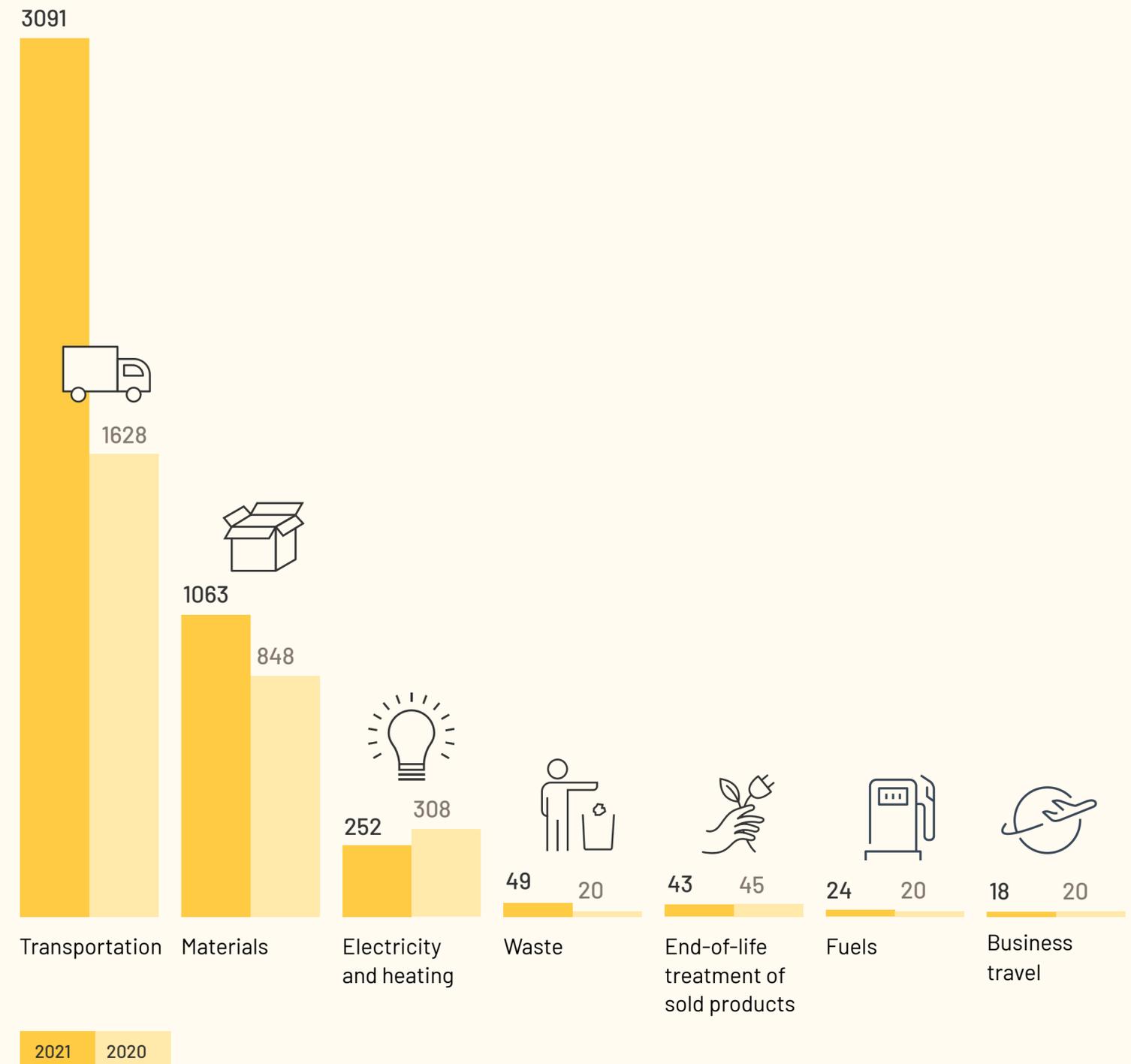
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# Our carbon footprint

In 2021, we continued mapping our organization's GHG emissions. To reduce emissions in line with our ambitions, we must continue monitoring our sources and expand the scope of our carbon accounting. Our most significant climate impact stems from our Scope 3 (indirect) emissions occurring within our value chain, with the most notable categories being transportation and purchased packaging materials. Use of fuel for generators and a few owned vehicles are the sources for our Scope 1 (direct) emissions, while electricity and heating to offices, warehouses, and stores are our main emission sources within scope 2 (indirect from generation of purchased energy).

Our total emissions figure for 2021 was 4539 tonnes CO<sub>2</sub> equivalents (tCO<sub>2</sub>e), compared to 2890 tonnes in 2020. The results from our carbon account confirm that transportation of goods remains our largest impact and challenge, representing approximately 70% of our total emissions. Komplett Group works with several small and large courier suppliers for our outgoing transportation in Sweden, Denmark, and Norway, as well as several suppliers and producers who deliver products to our warehouses.



Greenhouse Gas Emissions 2021

Tonne CO<sub>2</sub>e

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Our most significant climate impact stems from our Scope 3 emissions occurring within our value chain, with the most notable categories being transportation and purchased packaging materials.

In addition to increased business activity, we have in 2021 also been able to collect more data with the help of our suppliers resulting in the reporting of a significant increase in emissions from transportation. These findings indicate that we must continue to expand our work on mapping our emissions as a means of reducing GHG emissions from transportation in line with our stated ambitions.

In 2021, emissions from the use of fuel, generated waste, and packaging materials also increased, while end-of-life treatment of sold products, travel, and electricity and heat decreased. Despite the increased energy consumption,



overall emissions decreased due to changes in emission factors between 2020 and 2021. Business travel has been kept at a minimum during the past two years due to the Covid-19 pandemic. While we expect travel activity to increase as the effects of the pandemic diminish, our experience is that digital platforms work well for our organization. Komplet, therefore, aims to maintain and encourage digital collaboration, hence reducing the need to travel.

While we have been able to collect data from more sources than in 2020, we acknowledge that there are still weaknesses concerning our carbon account for 2021. We have not

been able to map our entire climate footprint, especially regarding emissions from our incoming transportation. In addition, it has been particularly difficult to gather emissions data from some suppliers as well as from operations in Sweden.

Despite this, many areas of the organization have improved data collection processes resulting in improved data quality. Where it has been available, data for 2020 has been updated. We still have a long way to go in structuring and streamlining our routines to ease data collection, and we will continue to improve the extent of our reporting going forward.

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# Environmental impact



## ENERGY CONSUMPTION

Komplett's energy consumption derives from our owned vehicles and from electricity use and heating in our offices, warehouses, and stores. In 2021, total energy consumption was 9,556 MWh, compared to 9,440 MWh in 2020. Energy from the use of diesel in Komplett's owned vehicles makes up 88 MWh, 1% of all energy consumption. The remaining 9,380 MWh, 99%, derives from electricity and heating at our owned and leased locations. Electricity usage is higher for our Norwegian operations, as electricity use is also the source for heating here, while district heating is only used at our locations in Sweden. Emissions from district heating are significantly lower this year, being reduced from 35,2 tCO<sub>2</sub>e to 17,2 tCO<sub>2</sub>e, due to lack of sufficient data.

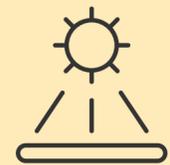
As part of our environmental policy, our ambition is to reduce our energy consumption and establish more renewable sources for energy generation at our locations. In Norway, 5% of Komplett's energy consumption deri-

ves from renewable solar energy, using the installed solar panels at our warehouse in Sandefjord. In 2021, we consumed 325 MWh of electricity produced from this installation, a reduction from 356 MWh in 2020. In Norway, we experience great variation in weather conditions, which naturally affects the generation of solar energy.

For 2021, it has been particularly difficult to collect electricity and heating data from our operations at Webhallen in Sweden. Webhallen has gone through multiple changes over the past year including changes in the staff responsible for data collection and the moving of locations of warehouses; this has affected the data quality. To provide a realistic impression of our energy consumption for 2021, electricity and heating for one of the warehouses, and for all stores, have been estimated using data from 2020. In 2022, we will evaluate our reporting and data collection routines to ensure that we report the most correct and precise data every year.

# 5%

of Komplett's energy consumption in Norway is from renewable solar energy



### Energy from electricity and heating

	2021	2020
Norway	5814 MWh	4973 MWh
Sweden*	1394 MWh	2133 MWh
Stores*	2260 MWh	2260 MWh

*\*Limited data available for 2021*

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#### TRANSPORTATION AND PACKAGING

Our ambition to reduce emissions, established in our strategy and in our sustainability principle, Komplet Environment, requires us to make significant adaptations to our operations. As an e-commerce actor, transport logistics is an extensive part of our business. This means that we transport large quantities of goods every day. The benefit of Komplet's business model is that it eliminates the distributor by transporting goods directly from storage to the customer. Nevertheless, we recognize that our impact from the transport of goods is one of our main challenges, and we work continuously to reduce our GHG emissions, especially from this source. More efficient packaging of our products can improve our impact from transport, as more compact packaging per product indicates less volume to transport. By adapting box sizes, we can save space in our freight transport and reduce packaging materials, hence reducing emissions from both sources. Throughout 2021, we worked actively to pack service vehicles more effectively, as a means of reducing airspace in our cargo shipments. Our systems now filter by volume data to select boxes with a maximum degree of filling when creating picking lists. Carton suggestions, in our digital packaging tool, have helped our staff complete this task. Recently, new minimum-sized boxes were also introduced for all parcel flows. By reducing airspace, we streamline the use of transportation, reducing our overall climate footprint. As we have established these new routines and tools within our logistics departments gradually throughout 2021, we will first see the full effects of these initiatives in our carbon account for 2022.

New initiatives will be launched in Q2 of 2022, when Komplet will install new packaging machines connected directly to all orders starting from our AutoStore warehouse. The new

machines will be able to fold and adapt the boxes to the contents of the order, reducing air content, the need for filling material, and total transport volume. In addition, we will send the products as they are packed when we receive them from the manufacturer, adding a transport label directly onto the product without the need for extra packaging materials.

Komplet Group aims to further develop the logistics areas of all our companies to shift to more use of electric transportation; this is especially important as we have noted an increased demand from clients for zero-emission transport. In 2022, we will increase our efforts to collaborate with our delivery suppliers, to find collective solutions to this mutual industry challenge of the high need for zero-emission transportation.

#### RETURNS

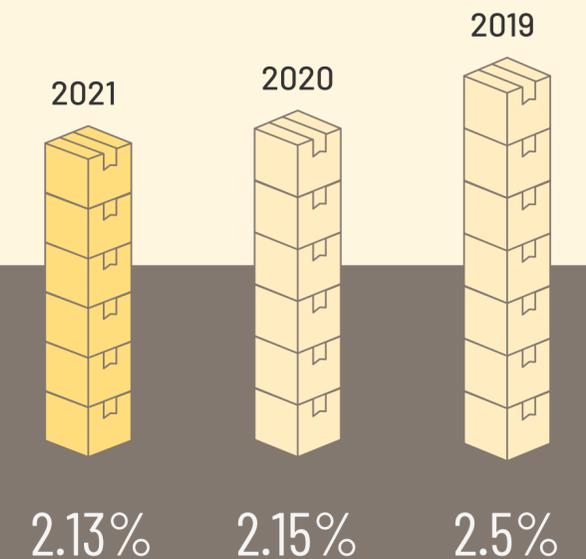
The high return rate within the e-commerce business is receiving increasing public attention because of its negative climate impact as it requires transporting products back and forth. Komplet strives to reduce the return rate to a minimum serving both our business and the environment by reducing our emissions. This requires us to ensure that our customers receive the correct products with the expected standard and quality. Detailed descriptions of our products, along with reviews from other customers, play a part in maintaining low return rates.

The return rate on products was 2.13% in 2021 compared to 2.15% in 2020. As our total sales increased in 2021, we are very pleased to see that the return rate was reduced. We always strive to provide our customers with correct and high-quality products to avoid returns.



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#### Return rate



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# Plans and aims for 2022

Going forward, we will increase our efforts to reduce our climate footprint. Continuing to map our emissions and monitoring progress, are the first steps towards identifying appropriate action areas that will help reduce our GHG emissions. We acknowledge that we still have much work to do to secure high-quality data, and our reporting process this year has demonstrated the need to establish structured data collection routines.

A specific course of action is to continue identifying solutions for efficient transport. Our goal is to provide zero-emission delivery options for our customers by 2026. That way, we enable our customers to make sustainable choices. In addition, we will engage with our transportation suppliers and develop standards for environmentally conscious transport solutions in our value chain. We will further develop our environmental management system, and engage with our employees, suppliers, and customers on initiatives to reduce the climate impact of our entire value chain.



Our goal is to provide zero-emission delivery options for our customers by 2026.



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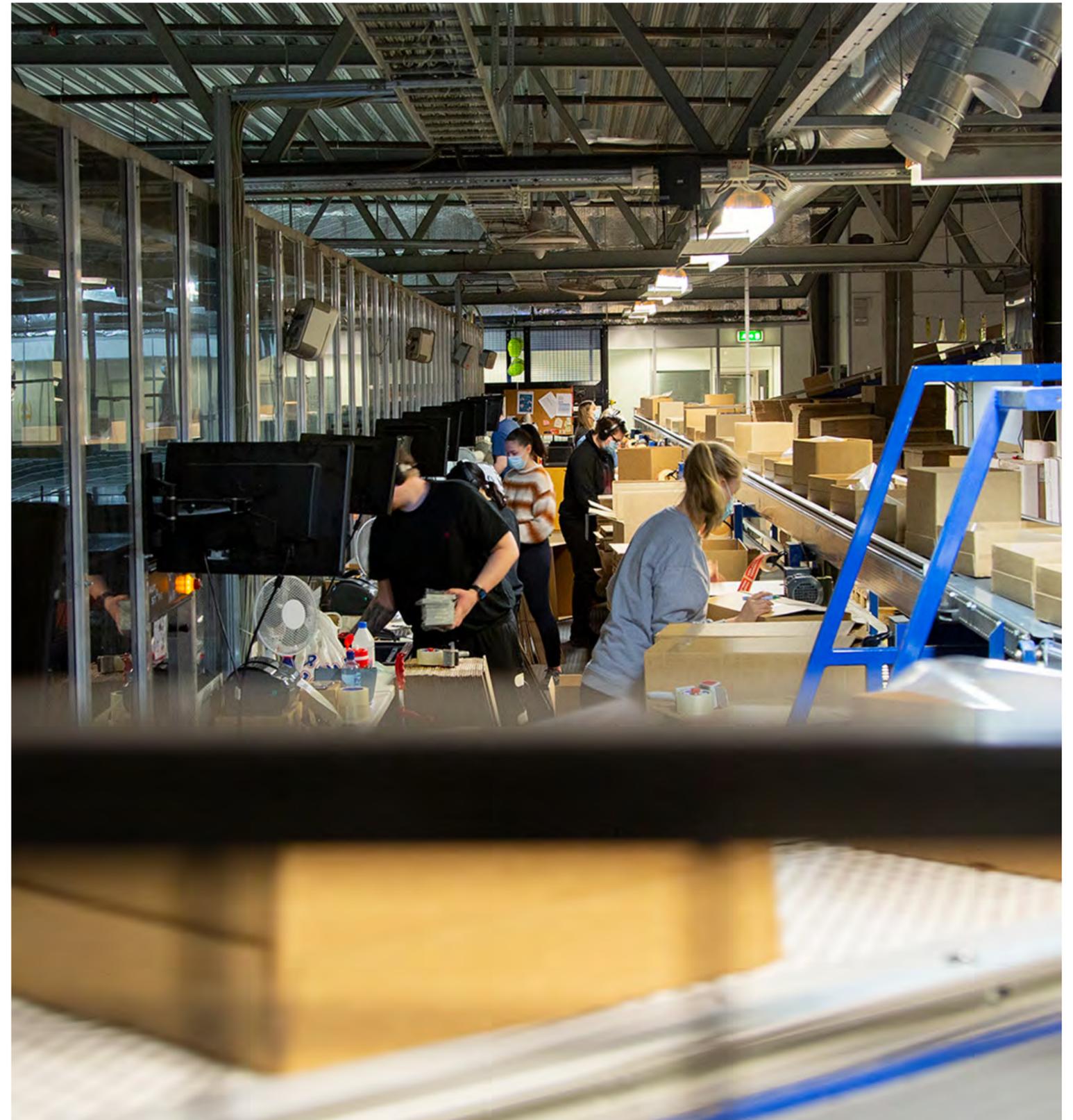
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# Komplett Tolerance

Komplett Group's employees contribute to the continuous development and growth of our business. Our people are the foundation of our success, and their safety and wellbeing is our top priority.

In our sustainability strategy, and through the strategic principle Komplett Tolerance, we continually focus on ensuring and promoting safety, equality and diversity. We strive to build and preserve an inclusive and uplifting work environment that ensures motivated, active and healthy employees, committed to our visions and values. Being a company relying on many suppliers, some located in regions with greater risk of human and labor rights violations, we acknowledge that we also have an important responsibility to manage and document our social impact beyond our own direct operations.

Further, promoting digital inclusion is our strategic focus area within the Komplett Tolerance principle, as we see it as crucial for providing equal opportunities for all groups of society. Using innovative solutions and our position as a leading online retailer of electronic products in Scandinavia, we aim to make technology and digital services accessible and inclusive for all.



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As a company seeking to continue to grow and improve our services, we value diversity as essential, to cultivate new ideas and solutions, guiding our company towards the future.

## Our people

In 2021, our company consisted of a total of 755 employees, an increase of 6% compared to 2020. Our team continues to grow and develop. Throughout 2021, Komplett Group welcomed 135 new employees, 87 men and 48 women. We always seek to ensure that our employees enjoy their work and feel valued for what they do. The turnover rate decreased slightly in 2021, from 18% to 17.8%. Although it is a small decrease, we are very encouraged by this development.

Parts of our operation, particularly logistics and customer service, vary greatly with seasonal and volume fluctuations. Assistance from temporary staff through staffing agencies is therefore necessary during our busiest seasons, particularly in the weeks before and after Black Week and Christmas. Over the course of the year, we relied on 297 temporary



workers to help us meet seasonal demands. Of these temporary staff members, 15 received permanent positions at Komplett this year.

The process of collecting data from the various HR departments has been challenging during the completion of this year's report due to an outdated system requiring many manual calculations. Most importantly, the system does not differentiate between new employees and employees who return in connection with seasonal work. The current numbers, therefore, provide a misleading impression of high rates for turnover and new hires. We are working to replace the existing system and aim to present more complete numbers in next year's report.

#### DIVERSITY AND INCLUSION

Komplett aims to be an attractive employer and to provide equal opportunities for everyone at every level of our operation. As a company seeking to continue to grow and improve our services, we value diversity as essential to cultivate new ideas and solutions, guiding our company towards the future. We welcome individuals from different backgrounds and mindsets to foster a dynamic and organic work environment where employees thrive. No discrimination or harassment on the grounds of gender, national origin, ethnicity, language, sexual orientation, age, or religious and political philosophy, is tolerated in our organization. No incidents of discrimination were reported in 2021.

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In 2021, 27% of our employees were female, which is an increase of 8% since 2020.

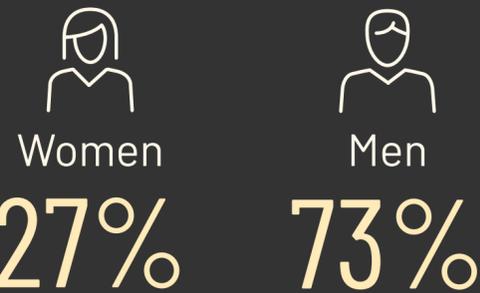
In 2021, 27% of our employees were female, which is an increase of 8% since 2020. The gender imbalance is likely due to the fact that several departments, e.g. warehouse and logistics, are traditionally perceived as male domains. However, the imbalance varies between departments; in some areas of our operations, particularly among administrative positions, women and men are equally represented.

Komplett supports and participates in the SHE Index initiative, to contribute to transparency in gender equality. Komplett Services AS received a medium SHE Index score for 2021, with a reduction of 1 point from the previous year.

At Komplett Group, we want to motivate both parents to take advantage of their available parental leave. A total of 28 employees took parental leave in 2021; 12 men and 16 women. The average number of weeks for parental leave was 13.5 weeks for women, and 8.1 weeks for men. The reason for the low average for men this year is that several employees completed most of their parental leave in 2020 or will continue their leave into 2022. We believe that by providing good conditions for parental leave, we ease the life-adjustment phase and facilitate an equal everyday life which allows both parents to take a caring role in the family.

Key diversity figures for Komplett Group 2021

Gender



Age

(excl. Webhallen)



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In the next year, we aim to complete a full pay gap analysis to gain a more complete overview of the differences that exist within the organization.

### PAY EQUITY

To develop and retain existing competence, and to recruit qualified employees, Komplet offers competitive remuneration packages. In addition, Komplet provides good insurance schemes and a comprehensive personnel policy. The combination of competitive remuneration and extensive policies that foster a positive and engaging environment is what make us an attractive employer.

In Komplet, male employees earn 11% more in average annual salary than female employees, excluding the compensation of the CEO. This must be viewed in the context of the gender distribution in the company. Women tend to have more administrative positions, whereas men form a greater portion of our warehouse and logistics departments. The ratio varies between our locations and departments, and in some instances – for example, Komplet Services in Norway – female employees earn on average 4% more than their male colleagues. However, we recognize that the difference in salary between men and women in Komplet Services Sweden

(23%) is significant. The difference is partly due to a comparison between different salary levels. In the next year, we aim to complete a full pay gap analysis to gain a more complete overview of the differences that exist within the organization.

### FREEDOM OF ASSOCIATION

Komplet fully supports the right of workers to freedom of association and collective bargaining, as enshrined in the International Labor Organization Core Convention. Operating in a labor-intensive industry, we see how important trade unions are for securing the rights of our workers and for creating an overall cooperative and safe work environment. In Norway, in 2021, 18% of our employees were unionized, while 38% were covered by collective bargaining agreements. In Sweden, we are affiliated with Unionen (administrative employees) and Handels (store and warehouse employees), and in Norway with EL & IT Forbundet and Fellesforbundet. Komplet is a member of the employer organizations NHO Service (in Norway) and Handel and Svensk Handel (in Sweden).

## PAY EQUITY

### KOMPLETT GROUP

11%



11% higher for men in average annual salary

### KOMPLETT SERVICES AS

4%



4% higher for women in average annual salary

### KOMPLETT SERVICES SWEDEN AB

23%



23% higher for men in average annual salary

### WEBHALLEN

6%



6% higher for men in average annual salary

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# Health, safety, and employee wellbeing

It is of the utmost importance to our company that we ensure the health and safety of our employees. Our warehouse routines and mitigation efforts are regularly assessed to secure the safety and welfare of employees. Non-conformities are reported and managed, and measures are taken to prevent similar incidents in the future. During 2021, no injuries were reported. This is a reduction from 12 injuries in 2020, which is a very positive development that we aim to uphold.

The Covid-19 pandemic continued to affect all our lives, including the work environment of our employees, in 2021. Continuing the safety regulations established in 2020, to prevent infection and sickness among our employees, has also been important this year. All administrative roles have been assigned to home offices during the most restrictive periods of the year, as an effort to maintain normal operations and safeguard our essential warehouse works from more contagion.

Sick leave for the organization was reduced by 5% in 2021 from 4.68% to 4.44%. We are very satisfied with the improvement in Komplet Services in Norway and Sweden. Webhallen experienced an increase in sick leave, from 5.28% in 2020 to 7.0% in 2021, due to the challenges of manning physical stores during the Covid-19 pandemic. The work to limit sick leave will continue in 2022, and we hope that the effects of the pandemic on our employees and operations will diminish.



Komplett is a member of the Occupational Health Service and provides health insurance for its employees as well as a workplace massage therapist. In addition, we run initiatives to reduce sick leave and focusing on more efficient follow-up and communication between management and employees.

### EMPLOYEE WELLBEING

We understand that wellbeing does not simply mean the absence of sickness and injuries; it also means feeling fulfilled, challenged, and celebrated for one's achievements. Close communication between employees and the management team is crucial for securing that each individual is able to contribute with their expertise and unique qualities. Further, we consider it crucial that workload in the organization is balanced, allowing for high levels of responsibility and ownership of tasks, without causing stress.

	Sick leave	2021	2020	% change
Komplett Group	4.44%	4.68%	-5%	
Komplett Norway	1.89%	3.45%	-45%	
Komplett Sweden	0.75%	4.36%	-83%	
Webhallen	7.00%	5.28%	33%	

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Our Work Environment Committee is responsible for initiating measures to preserve and improve the wellbeing of all our employees. The committee, consisting of four employees and four representatives from the management team, oversees planning of the health and safety initiatives in the organization. The representatives also monitor developments in concerns about employee safety, health, and wellbeing. In addition, we have four safety representatives, each responsible for ensuring that the workers' health, safety, and wellbeing is in accordance with the Norwegian Workers Act.

To engage with our employees and measure employee satisfaction, Komplett implemented the AI software Winningtemp in 2019. The tool assists us in measuring indicators like leadership, employee satisfaction, work situation, and personal development, in addition to functioning as a channel for feedback. Bi-weekly surveys are sent to all employees.

The average score for 2021 was 7.4 out of 10, which is a significant increase from 6.9 in

2020. In addition, the response rate of 92% demonstrates high levels of engagement. It is encouraging to see that our focus on employee satisfaction is providing results, and we will continue this important work in 2022. "Team feeling" is one of the categories that continuously receive high scores among employees. On the other hand, we see potential for improvement regarding the category "personal development", which has received relatively low scores. Going forward, we recognize that providing more opportunities for personal development must be put higher on our agenda. Through the use of Winningtemp, we are happy to receive this feedback from our employees and we are determined to turn these responses into action points for 2022.

### EMPLOYEE BOARD

The "Komplett Employee Board" was established in 2021. The task of the Employee Board is to provide input from our employees, and to implement measures that have been decided on together with the management team. An important aspect is to en-

sure ownership and involvement in the 2025 business strategy, throughout all levels of our companies. The board consists of a selection of 21 employees from all units in the organization, and the participants must be representative of all employees. The members of the board are divided into three different groups:

- Komplett strategy 2025
- Komplett 25 years
- Enthusiasm and employee engagement

All employees are welcome to provide input and ideas to their representatives, who will convey these contributions to the board for discussion. The participants of the Employee Board are elected for a one-year period, and shall throughout this period be active in proposing, developing, and delivering on priority measures. The executive management team is the sponsor of the Employee Board, which also acts as a sounding board in relevant matters.

## Employee satisfaction



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The average score for 2021 was 7.4 out of 10, which is a significant increase from 6.9 in 2020. In addition, the response rate of 92% demonstrates high levels of engagement.

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# Learning and development

Training of our employees is imperative to make sure they are properly prepared for their responsibilities as part of the Komplet team. In addition to mandatory safety training and onboarding for new employees, we provide training courses in GDPR, ergonomics, customer management, and sales, to all employees seeking to improve and expand their knowledge. Komplet Bedrift also provides courses in the company's environmental policies to employees.

#### KOMPLETT'S LOGISTICS SCHOOL

Training and professional development can provide motivation for our employees in addition to building necessary competence within the organization. With this in mind, Komplet's Logistics School was established in 2019 together with our external partner Fønix. In addition, we developed a modular logistics course for the purchasing department.

The Logistics School is an excellent opportunity for our employees to develop their skills and areas of expertise. In 2021, nine of our employees participated in the Logistics School and passed the final exam. The program consists of approximately 900 hours of training. Several participants have received promotions, or have moved to new positions internally, after finishing the program. One of the goals of the modular course is to increase cross-functional logistics



competence within the group. A new group of employees will start their training in 2022.

#### TRAINEES

Since 2014, as part of our initiatives in our local community of Sandefjord, we have cooperated, in the 4S partnership with Sandefjord High School which provides students with trainee positions. The students, usually starting at the age of 15-16, get the chance to train in different parts of the company as apprentices for two years. In 2021, two trainees passed their apprenticeship tests, while we still have three trainees continuing their training into 2022. Participation in the program grants general university admissions certification, or vocational competence, to the students in the areas of sales and office administration.



The Logistics School is an excellent opportunity for our employees to develop their skills and areas of expertise.

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# Strategic principle: digital inclusion

As a leading digital technology provider in Norway, Komplettn will use its position to emphasize digital inclusion. We will work to innovate and provide well-designed services and introduce initiatives aimed at including all groups of society.

Komplettn works to continuously develop our websites in line with universal design. Universal design is based on the idea that services should be available to everyone, regardless of age, functional ability, and level of education. We have previously dedicated a Universal Design Lead among our developers, and held workshops to provide insight and awareness. Our ambition is to be a leader within universal design and availability as part of our strategy on digital inclusion.

For our efforts with universal design, we were rated top three in the Norwegian Innovation Index (NII) for digital innovations and number one among retailers in 2021. Using a carefully designed method, NII captures the company's innovations



and customers' perceptions of the value creation these innovations have brought about. We are very excited and proud of this achievement and our ascent from a top 10 placement in 2020. To receive recognition of our innovative work and its importance for the society around us is deeply motivating for our future work.

As a major player in the provision of gaming equipment, Komplettn is greatly invested in the gaming and e-sport sphere in the Nordics. Another big focus of our digital inclusion initiative includes promoting gaming as an important arena for learning, development and social networking, that anyone should be able to take part in. We aim to use our

positions to counteract the negative image gaming has in many parts of society by supporting and demonstrating how gaming is an important activity with positive impacts in many people's lives. Another important aspect of this topic is ensuring a gender-inclusive gaming and e-sport environment. The number of female gamers is still significantly lower than that of men, and many girls and women participating in gaming face prejudice and harassment. Komplettn strives to use its position to provide a safe and welcoming space for everyone who wants to participate in gaming. As part of our philanthropic work, gaming is a large contributor. Our annual initiatives include "Gamers against Cancer" in Norway and "Streamhjälpen" in Sweden.

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## Initiatives

### + Gamers against Cancer

Our Black Week charity initiative, “Gamers against Cancer”, was established in 2020. The community fundraiser aims to raise money for the Childhood Cancer Society in Norway, an organization that contributes to the fight against childhood cancer.

In 2021 we continued the previous year’s success. During “Black Week” several of Norway’s top influencers in gaming joined us for a livestream from our studio in Sandefjord. The campaign also has an educational aspect, as representatives from the Childhood Cancer Society participated during the event, providing information on current research, and on the areas of the organization that the funds will support. Further, our suppliers also supported the initiative, by donating money to the cause and products as giveaways.

Our yearly Black Friday Livestream is our biggest stream with a total of 84,000 viewers. It is therefore the best occasion to raise the most donations for this cause. At its peak, 4,300 viewers were streaming. The event raised 2 million NOK for the Childhood Cancer Society in the course of the 94-hour livestream event.

### + Streamhjälpen

In December 2019, the initiative “Spelgrytan” was introduced to take a stand to reduce inequality and contribute to digital inclusion in gaming. The purpose of the initiative was to collect donations in terms of games and consoles for organizations working with vulnerable children and youth. Such organisations were kindergartens, sheltered housing, and hospitals where children do not have the opportunity to participate in digital play.

As a result of the initiative, 500 games from 200 different customers, as well as 30,000 SEK in donations from approximately 400 customers were collected and donated. Suppliers also contributed by donating products that allowed us to put together 25 game packages. This initiative was very well received among the employees in Webhallen, who volunteered their time throughout the period of the initiative.



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# Plans and aims for 2022

Going forward, we are planning to complete several initiatives. This includes an in-depth pay gap analysis to better map and equalize the wage gaps that are identified. Komplett Group is an employer that provides equal opportunities and pay for equal work, and we aim to strengthen this position with the necessary analysis. Further, we will also conduct an analysis of involuntary part-time work. This is required as part of the Norwegian Equality and Discrimination Act, and we seek to ensure that no one in our organization is prevented from working full time if that is their desire. We look forward to expanding on our digital inclusion work, developing new projects in the future to promote digital participation for all.



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CATEGORY	UNIT	2021	2020	CHANGE (%)	
<b>PEOPLE</b>					
<b>EMPLOYMENT</b>					
<b>Employees in Komplet Group</b>					
Total employees	Amount	755	711	↑	6%
Number of permanent employees	Amount	682	656	↑	4%
Of which are full time	Amount	497	480	↑	4%
Of which are part time	Amount	185	176	↑	5%
Number of temporary employees	Amount	22	n/a		-
Of which are full time	Amount	4	n/a		-
Of which are part time	Amount	18	n/a		-
Total management positions	Amount	48	47	↑	2%
Trainees	Amount	6	4	↑	50%
New hires	Amount	135	139	↓	-3%
Turnover	Percent	17,8%	18,0%	↓	-1%
<b>Hired temporary employees</b>					
Hired temporary employees	Amount	297*	261	↑	14%
<b>Union membership</b>					
Komplett Services AS	Amount	18,5%	19,3%	↓	-4%

\* Only Komplet Services Sweden AB and Komplet Services AS

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CATEGORY	UNIT	2021	2020	CHANGE (%)
<b>DIVERSITY AND EQUALITY *</b>				
<b>Gender balance</b>				
Total female employees	Percent	27%	25%	↑ 8%
Full time positions	Percent	38%	26%	↑ 46%
Part time positions	Percent	33%	23%	↑ 43%
Mangement positions	Percent	31%	28%	↑ 11%
<b>Age distribution *</b>				
Age <30	Amount	73	n/a	-
Age 30-50	Amount	250	n/a	-
Age >50	Amount	42	n/a	-
<b>Parental leave</b>				
Employees in parental leave (Women)	Amount	16	7	-
Employees in parental leave (Men)	Amount	12	15	-
Average weeks parental leave (Women)	Average	14	17	↓ -21%
Average weeks parental leave (Men)	Average	8	13	↓ -38%
<b>Pay gap (Percentage salary level women to men)</b>				
Total all employees	Percent	-11,0%	-13,4%	↓ -18%
Executive Committee	Percent	-26%	n/a	-
Management	Percent	-2%	n/a	-
Other employees	Percent	-5%	n/a	-

\* Only Komplet Services Sweden AB and Komplet Services AS

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CATEGORY	UNIT	2021	2020	CHANGE (%)	
<b>HEALTH AND SAFETY</b>					
Estimated Man Hours	Amount	1 035 853	1 020 984	↑	1%
Sick Leave	Percent	4,4%	4,7%	↓	-5%
Work Related Injuries	Amount	0	12	↓	-100%
Lost Time Injuries	Amount	0	0		-
Fatalities	Amount	0	0		-
<b>CLIMATE AND ENVIRONMENT</b>					
<b>GHG-EMISSIONS</b>					
Total emissions (tCO <sub>2</sub> e)	tCO <sub>2</sub> e	4539,3	2890,0	↑	57%
<b>Scope 1</b>					
Fossil fuels	tCO <sub>2</sub> e	23,8	20	↑	19%
<b>Scope 2</b>					
Electricity	tCO <sub>2</sub> e	235,1	208,3	↑	13%
District Heating (Sweden)	tCO <sub>2</sub> e	17,2	35,2	↓	-51%
<b>Scope 3</b>					
Supplier transportation	tCO <sub>2</sub> e	3090,5	1628,1	↑	90%
Waste	tCO <sub>2</sub> e	49	20,1	↑	144%
End of life treatment of sold products	tCO <sub>2</sub> e	43,4	45,3	↓	-4%
Business travel	tCO <sub>2</sub> e	17,6	19,6	↓	-10%

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CATEGORY	UNIT	2021	2020	CHANGE (%)	
<b>WASTE</b>					
Total waste	Tonnes	1248,8	1102,9	↑	13%
Recycling rate	Tonnes	90%	90%	↑	0%
<b>END-OF-LIFE TREATMENT OF SOLD PRODUCTS</b>					
EE-waste	Tonnes	2093,4	2124,9	↓	-1%
<b>PACKING MATERIALS</b>					
Plastics	Tonnes	122,5	66,6	↑	84%
Cardboard	Tonnes	672,2	682,6	↓	-2%
Single use wood pallets	Tonnes	275,8	186,1	↑	48%
<b>ENERGY CONSUMPTION</b>					
Total energy consumption	MWh	9555	9440,1	↑	1%
Fossil fuels	MWh	88,3	74,4	↑	19%
Electricity	MWh	7581,9	6664	↑	14%
Electricity from solar panels	MWh	325,1	356,5	↓	-9%
Heating	MWh	1559,7	2345,2	↓	-33%

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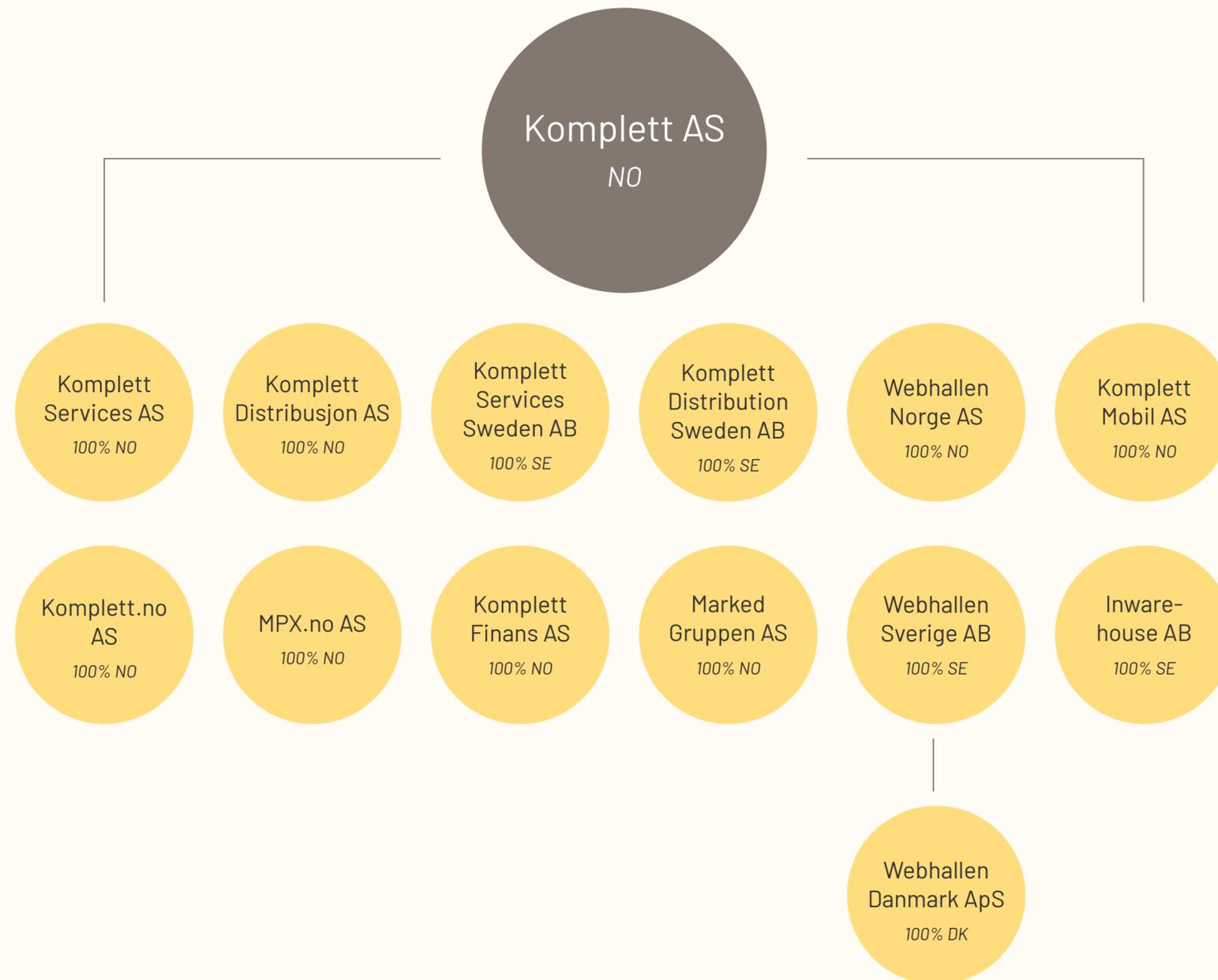
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# GRI Standards Index

GRI STANDARD DISCLOSURE NUMBER	DISCLOSURE TITLE	COMPLETENESS	REFERENCE/RESPONSE	COMMENT
<b>GENERAL DISCLOSURES</b>				
102-1	Name of the organization	Complete	About Komplet	
102-2	Activities, brands, products, and services	Complete	About Komplet	
102-3	Location of headquarters	Complete	About Komplet	
102-4	Location of operations	Complete	About Komplet	
102-5	Ownership and legal form	Complete	About Komplet	
102-6	Markets served	Complete	About Komplet	
102-7	Scale of the organization	Complete	About Komplet	
102-8	Information on employees and other workers	Complete	Komplet Tolerance: Our People	
102-9	Supply chain	Complete	Corporate Governance: Supply Chain Engagement	
102-10	Significant changes to the organization and its supply chain	Complete	About Komplet: Supply Chain Engagement	
102-11	Precautionary Principle or approach	Complete	Corporate Governance	
102-12	External initiatives	Complete	About Komplet	
102-13	Membership of associations	Complete	Komplet Circular, Komplet Tolerance	
102-14	Statement from senior decision-maker	Complete	A Message from our CEO	
102-15	Key impacts, risks, and opportunities	Complete	Corporate Governance: Risk Management	
102-16	Values, principles, standards, and norms of behavior	Complete	About Komplet: Vision, Mission and Values	
102-18	Governance structure	Complete	Corporate Governance	
102-26	Role of highest governance body in setting purpose, values, and strategy	Complete	Corporate Governance	
102-40	List of stakeholder groups	Complete	Sustainability at Komplet: Materiality and Stakeholder Dialogue	

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102-41	Collective bargaining agreements	Complete	Komplett Tolerance: Our people	
102-42	Identifying and selecting stakeholders	Complete	Sustainability at Komplett: Materiality and Stakeholder Dialogue	
102-43	Approach to stakeholder engagement	Complete	Sustainability at Komplett: Materiality and Stakeholder Dialogue	
102-44	Key topics and concerns raised	Complete	Sustainability at Komplett: Materiality and Stakeholder Dialogue	
102-45	Entities included in the consolidated financial statements	Complete	Annual report 2021, About the Report	
102-46	Defining report content and topic Boundaries	Complete	About the Report	
102-47	List of material topics	Complete	Sustainability at Komplett: Materiality and Stakeholder Dialogue	
102-48	Restatements of information	Complete		Not relevant
102-49	Changes in reporting	Complete	About the Report	
102-50	Reporting period	Complete	About the Report	2022
102-51	Date of most recent report	Complete	About the Report	March 2021
102-52	Reporting cycle	Complete	About the Report	Annual
102-53	Contact point for questions regarding the report	Complete	About the Report	
102-54	Claims of reporting in accordance with the GRI Standards	Complete	About the Report	
102-55	GRI content index	Complete	Appendix - GRI Index	
102-56	External assurance	Complete		No external assurance of the Sustainability report

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<b>MANAGEMENT</b>				
103-1	Explanation of the material topic and its Boundary	Complete	Sustainability at Komplet: Materiality and Stakeholder Dialogue	
103-2	The management approach and its components	In progress	Corporate Governance	
103-3	Evaluation of the management approach	In progress		Not available for 2021. Is part of strategy for 2022
<b>ECONOMIC PREFORMANCE</b>				
201-1	Direct economic value generated and distributed	Complete	"About Komplet: Economic value generation and distribution"	
201-2	Financial implications and other risks and opportunities due to climate change	In progress	Corporate Governance: Risk Management	Not available for 2021. Is part of strategy for 2022
<b>ANTI-CORRUPTION</b>				
205-1	Operations assessed for risks related to corruption	In progress	Corporate Governance: Business Conduct	Not available for 2021. Is part of strategy for 2022
205-2	Communication and training about anti-corruption policies and procedures	In progress	Corporate Governance: Business Conduct	Not available for 2021. Is part of strategy for 2022
205-3	Confirmed incidents of corruption and actions taken	Complete	Corporate Governance: Business Conduct	
<b>ANTI-COMPETITIVE BEHAVIOUR</b>				
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Complete	Corporate Governnce: Business Conduct	
<b>MATERIALS</b>				
301-1	Materials used by weight or volume	Complete	Komplett Circular: Material Use	
<b>ENERGY</b>				
302-1	Energy consumption within the organization	Complete	Komplett Environment: Energy Consumption	

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<b>EMISSIONS</b>				
305-1	Direct (Scope 1) GHG emissions	Complete	Komplett Environment: Our Carbon Footprint	
305-2	Energy indirect (Scope 2) GHG emissions	Complete	Komplett Environment: Our Carbon Footprint	
305-3	Other indirect (Scope 3) GHG emissions	Complete	Komplett Environment: Our Carbon Footprint	
<b>EFFLUENTS AND WASTE</b>				
306-2	Waste by type and disposal method	Complete	Komplett Tolerance: Waste Management	
<b>ENVIRONMENTAL COMPLIANCE</b>				
307-1	Non-compliance with environmental laws and regulations	Complete		
<b>SUPPLIER ENVIRONMENTAL ASSESSMENT</b>				
308-1	New suppliers that were screened using environmental criteria	In progress	Supply chain	Not available for 2021. Is part of strategy for 2020
<b>EMPLOYMENT</b>				
401-1	New employee hires and employee turnover	Complete	Komplett Tolerance: Our people	
401-3	Parental leave	Complete	Komplett Tolerance: Our people	Not included return to work statistics
Komplett indicator	Parental leave	Complete	Komplett Tolerance: Our people	New legal requirement in Norway
<b>OCCUPATIONAL HEALTH AND SAFETY</b>				
403-1	Occupational health and safety management system	Complete	Komplett Tolerance: Employee safety and wellbeing	
403-2	Hazard identification, risk assessment, and incident investigation	Complete	Komplett Tolerance: Employee safety and wellbeing	

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403-5	Worker training on occupational health and safety	Complete	Komplett Tolerance: Employee safety and wellbeing	
403-8	Workers covered by an occupational health and safety management system	Complete	Komplett Tolerance: Employee safety and wellbeing	
403-9	Work-related injuries	Complete	Komplett Tolerance: Employee safety and wellbeing	
<b>TRAINING AND EDUCATION</b>				
404-1	Average hours of training per year per employee	In progress	Komplett Tolerance: Learning and development	Complete data not available for 2021.
404-2	Programs for upgrading employee skills and transition assistance programs	Complete	Komplett Tolerance: Learning and development	
<b>DIVERSITY AND EQUAL OPPORTUNITY</b>				
405-1	Diversity of governance bodies and employees	Complete	Komplett Tolerance: Our People	
405-2	Ratio of basic salary and remuneration of women to men	Complete	Komplett Tolerance: Our People	
<b>NON-DISCRIMINATION</b>				
406-1	Incidents of discrimination and corrective actions taken	Complete	Komplett Tolerance: Our People	
<b>CHILD LABOUR</b>				
408-1	Operations and suppliers at significant risk for incidents of child labor	In progress		"Not available for 2021. Is part of strategy for 2022"
<b>FORCED OR COMPULSORY LABOR</b>				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	In progress		"Not available for 2021. Is part of strategy for 2022"
<b>SUPPLIER SOCIAL ASSESSMENT</b>				
414-1	New suppliers that were screened using social criteria	In progress		"Not available for 2021. Is part of strategy for 2022"

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<b>CUSTOMER HEALTH AND SAFETY</b>				
416-1	Assessment of the health and safety impacts of product and service categories	Complete	Corporate Governance: Customer privacy and product safety	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Complete	Corporate Governance: Customer privacy and product safety	
<b>MARKETING AND LABELING</b>				
417-2	Incidents of non-compliance concerning product and service information and labeling	Complete		
417-3	Incidents of non-compliance concerning marketing communications	Complete		
<b>CUSTOMER PRIVACY</b>				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Complete		





**KOMPLETT**<sup>®</sup>GROUP

# Sustainability report

**2021**