

Sustainability Statement 2023



adviseense. 

GHG-emissions Scope 1 & 2

121
tCO2e

GHG-emissions Scope 3

1947
tCO2e

Diversity Group (Women)

42%
Target: >40% annually

Employee Headcount

424

Employee Well-Being

32

Target: Above Global Benchmark (15)*

Diversity Management (Women)

37%
Target: >40% annually

First CSRD-Aligned Double
Materiality Assessment



2023 Material topics: Our Workforce, Data Security,
Climate Change and Business Conduct

First Sustainability Statement



This document Advisense's first Sustainability
Statement, developed in preparation of the CSRD

Diversity Board (Women)

43%
Target: >40% annually

*eNPS-scale: -100 to +100 | Latest Result: December 2023



Dear Stakeholders

As CEO of Advisense, I am proud to introduce Advisense's "Sustainability Statement 2023". This year marks a milestone with our first formal sustainability statement, prepared in response to the EU Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). The report highlights our dedication to environmental, social, and governance (ESG) principles and the central role of sustainability in our strategic vision.

In 2023, we enhanced our sustainability framework by updating our Sustainability Policy, ESG targets and KPIs. Most importantly, we conducted our first double materiality assessment, identifying the following key focus areas: Our Workforce, Data Security, Climate Change and Business Conduct - all vital for sustainable growth. You will find information on how we work with these topics throughout this report.

Operating across multiple countries and serving a diverse client base, we recognise the impact our services can have in promoting sustainability through sound business practices. Our focus on our environmental footprint and our climate change mitigation activities received particular attention in 2023. We completed our first Group-wide carbon accounting in 2023, laying

the foundation for setting Science Based Targets on our emissions - an important step in our ongoing climate initiatives for 2024 and beyond.

Our dedication extends beyond internal policies and procedures to our client engagements, where we help our clients navigate the complexities of sustainability and ESG compliance with solutions that are both up-to-date and future-proofed, ensuring preparedness and resilience.

Looking forward, our sustainability journey is far from complete. In line with our vision, we aim to lead the way in creating a sustainable future for people, business, and society, continuously improving our practices and providing clients with solutions that not only meet but exceed regulatory and societal expectations.

We invite you to review the detailed findings and strategic priorities in Advisense's "Sustainability Statement 2023". This report aims to inspire other organisations to join us toward a more sustainable and resilient future.

Best regards,
Kristian Bentzer
CEO, Advisense

About Advisense

Advisense is a leading governance, risk and compliance (GRC) powerhouse, offering best-in-class services and tech solutions to the European industry. Since 2008, we have combined regulatory, security, technological and risk management expertise to advise and challenge the industry with leading edge insights and experience.

Advisense primarily serves clients in the financial services sector, along with large corporations across various industries and the public sector.

Within our consultancy business, we offer advice, managed services, and outsourcing solutions. Our areas of expertise include risk management, compliance, cyber security, finance and treasury management, financial crime prevention, internal audit, and sustainability. For further information about our business areas, please see our website Advisense.com.

Our business area Tech Solutions provides advanced risk management systems, quantitative analytics platforms, and compliance software tools. In addition, we offer a full range of managed services within fund infrastructure and management through our subsidiary FCG Fonder.

Advisense has more than 400 employees based in Bergen, Brussels, Copenhagen, Gothenburg, Frankfurt, Helsinki, Malmö, Oslo, Stockholm, Riga, and Vilnius.

Our Vision

A sustainable world for people, business and society through sound and resilient organisations ready to embrace the future.

Our Mission

In partnership with our clients, we pro-actively navigate a changing and complex environment, creating hands-on solutions tailored to our clients' needs.

Our Values

Advisense's core values form the basis of our corporate and business culture. We work actively with our values and how we apply them in everyday life to create a good working environment. Our values are the foundation of our processes, and we continuously follow up on how well we live our values.

Passion

We take on our work with passion. Committed to make a difference and with a genuine drive to help our customers succeed

Expertise

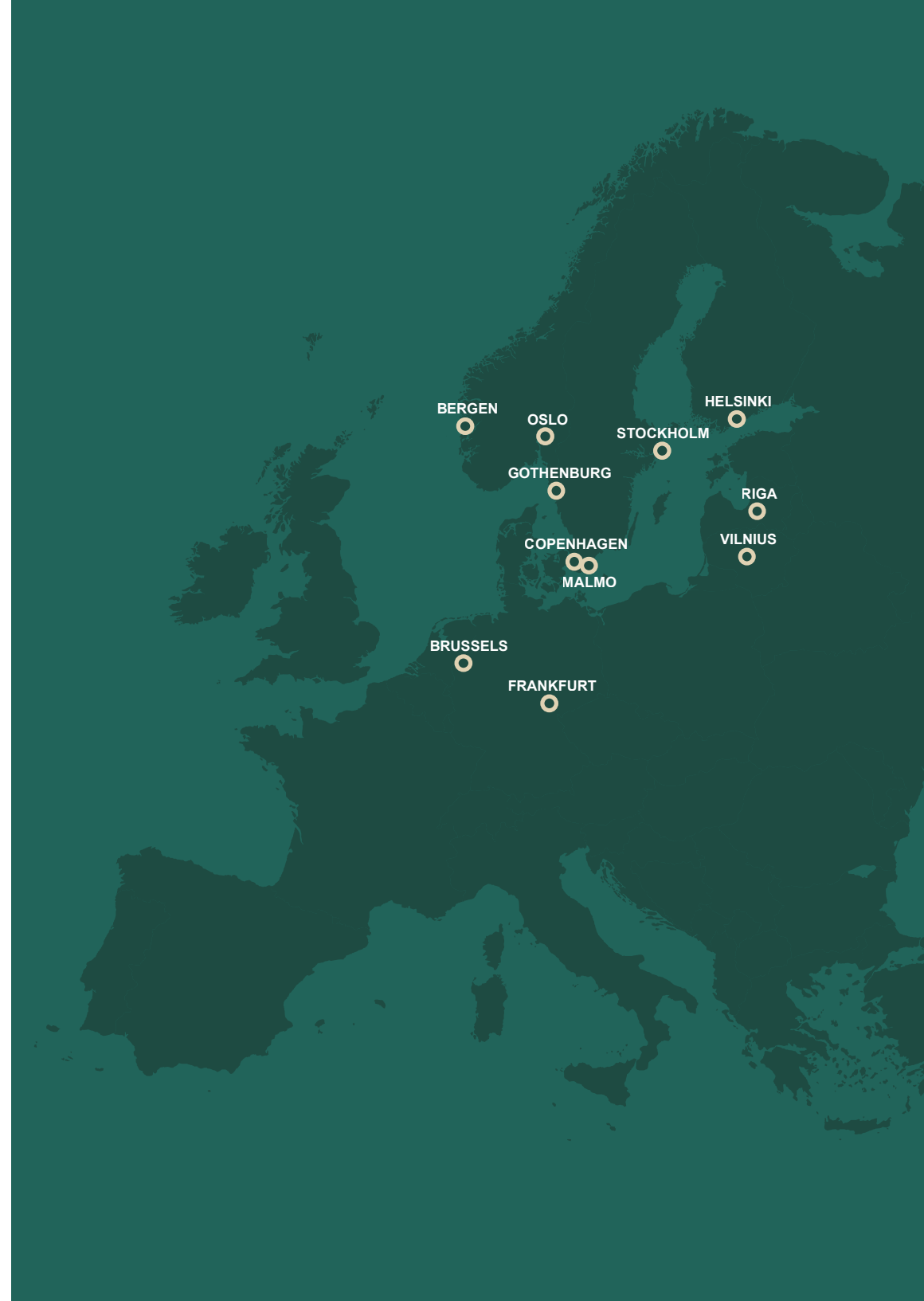
As a knowledge driven organisation, we are dedicated to sharing our expertise with our customers and each other, while constantly expanding and deepening our knowledge

Agility

Deeply rooted in our entrepreneurial spirit, we value agile work processes and a flat culture that enables us to find hands-on solutions quickly and efficiently

Kindness

We act with kindness towards each other, our customers and society. We support, empower and challenge each other, working together as a team and building long term relationships





Basis for Preparation

This statement outlines Advisense's approach to sustainability, covering our sustainability strategy, governance structure, and material topics. The purpose is to offer stakeholders a transparent and comprehensive overview of our sustainability work, including information about our impact on people and the environment, our financial risks and opportunities related to sustainability matters as well as outcomes for the year 2023.

2023 represents the first year in which we have formulated a sustainability statement, as preparation for the EU Corporate Sustainability Reporting Directive (CSRD) and the applicable European Sustainability Reporting Standards (ESRS). According to the implementation timeline, [Advisense will prepare its 2025 annual report in full compliance with the CSRD](#). Advisense's sustainability statement is moreover designed to ensure future compliance when Advisense surpass the thresholds outlined in the Swedish Annual Accounts Act.

The sustainability statement covers the period January 1st to December 31st, 2023, and has been prepared on a consolidated basis. The scope of consolidation is the same as for the

financial statements, meaning that the statement includes all subsidiaries within the Advisense Group, exempting them from individual sustainability reporting requirements.

The report is structured into four main chapters: General Information, Environmental Information, Social Information, and Governance Information. The General Information section provides an overview of our approach to materiality, including the principles we apply, our engagement practices, and the outcome of our double materiality assessment.

Insights into the identified impacts, risks, and opportunities (IROs) associated with each material sustainability topic, can be found in the section titled "Our Impacts, Risks and Opportunities" within the Environmental, Social and Governance chapters.

Each chapter also features a section titled "Our Approach," outlining Advisense's policies, strategies, actions, targets, and metrics in relation to the respective sustainability topic.

Sustainability Strategy

In 2023, Advisense conducted a comprehensive review of our Sustainability Policy and strategy, and outlined a roadmap for our sustainability priorities and activities for the coming years.

Our overarching sustainability goal is to offer products and services aimed at advancing sustainable practices, recognising the potential for creating significant positive impact through our client engagements. This includes:

- **Strengthening the financial system through sound risk and capital management practices**
- **Promoting sound anti-money laundering and financial crime prevention measures in client engagements**
- **Safeguarding privacy and ensuring robust cybersecurity**
- **Enhancing operational efficiency and managing operational risks effectively**
- **Advocating for ethical business practices**

To reach our vision of fostering a sustainable future through a sound financial industry, it's crucial to have a team that embodies our core values. Our success hinges on the expertise of our professionals; without them, we

cannot fulfill our ambitions. Recognising this, we are committed to nurturing our employees' development, with a special focus on enhancing their knowledge and skills in sustainability for the benefit of both themselves and our clients.

In addition to our client-focused efforts, we continuously track our own sustainability progress through KPIs across the ESG spectrum to monitor the effectiveness of our actions. Our ESG KPIs are, and will continue to be, tracked as part of our standard monthly reporting to management and the board.

We are committed to reducing our environmental footprint, and in 2023, specific targets and KPIs for sustainable business travel, commuting, and energy use were established. In 2024, we will prioritise the implementation of initiatives to meet these targets. Furthermore, we are committed to responsible and ethical business conduct, and fostering a positive business culture and working environment where diversity, inclusion, and employee well-being is central. Through continuous training, feedback mechanisms, and social initiatives, we strive to continuously improve our organisational culture and create a supportive and empowering workplace for all employees.

Double Materiality Assessment

In preparation for the EU Corporate Sustainability Reporting Directive (CSRD), a double materiality approach has been adopted to determine material topics for reporting in alignment with the European Sustainability Reporting Standards (ESRS). The double materiality principle encompasses two key aspects: impact materiality and financial materiality:

Impact materiality involves evaluating both the actual and potential positive and negative impacts of Advisense's activities and business relationships on people and the environment.

Financial materiality involves evaluating how Advisense's risks and opportunities related to sustainability topics can affect the company's financial performance.

Our double materiality assessment was informed by the Draft EFRAG Implementation Guideline on Materiality Assessments, which involves three key steps:

- Firstly, we conducted a contextual assessment, including an analysis of affected stakeholders.
- Secondly, we compiled a long list

of sustainability topics, identifying both actual and potential impacts, risks, and opportunities. This list was cross-referenced with ESRS 1 paragraph AR16 to ensure comprehensiveness.

- Finally, we applied specific criteria for assessing both impact and financial materiality to determine our material IROs and related sustainability topics.

The materiality assessment was conducted by our ESG team, and the results were validated by the Group management through a workshop. The final assessment was reviewed and confirmed by the Group management, and the Board of Directors has been informed of the outcomes.

The materiality assessment formed the basis of our 2023 revised sustainability strategy.

Stakeholder Engagement

To continuously improve and to ensure that our products and services are aligned with our sustainability goals and the expectations of our clients, we are committed to fostering strong relationships with our stakeholders.

Through the 2023 double materiality assessment process, we identified 5 key stakeholder groups, reflecting groups that are “affected” by our operations or “users” of information. See illustration.



Active engagement with Advisense’s stakeholders is essential for gaining insight into their expectations, priorities, and the impact of our operations. The purpose of this engagement is to accurately identify and assess our material impacts, risks and opportunities, and develop strategies and action plans aimed at effectively managing these. Our 2023 materiality assessment included the opinions and competences of several stakeholders, including sustainability experts, affected stakeholders, legitimate representatives of affected stakeholders as well as clients, owners and lenders.

We conducted a thorough analysis of existing internal processes such

as employee surveys and previous communication with owners and lenders. Where we did not have sufficient information, we assessed views and opinions on sustainability matters via interviews. Input from stakeholder engagement initiatives was documented and used to inform the scoring of sustainability matters. As such, the views of our stakeholders informed the double materiality assessment, which in turn formed the basis of our sustainability strategy.

In 2024, stakeholder management will be a prioritised area. We are dedicated to enhancing engagement efforts and to improve the organisation of stakeholder data to address key areas. This effort will establish a proper foundation for our upcoming materiality assessments and our continuous management of impacts, risks, and opportunities.

Our material topics

In the double materiality assessment process, four material sustainability topics were identified, scored and validated.

Advisense’s sustainability statement includes separate chapters on Environmental, Social and Governance information.

Information related to Advisense’s Employees is included under “Social Information”, information on Data Security and Privacy and Business Conduct is included under “Governance Information”, and Climate Change information is included under “Environmental Information”.

All topics are covered by the ESRS topical standards, except for “Data Security and Privacy,” which is entity specific. Moreover, each chapter includes a description of our material impacts, risks and opportunities in relation to each topic (“Our IROs”), and the corresponding disclosures on governance, strategy, policies, metrics and targets (“Our Approach”).



Sustainability Governance

Advisense is committed to conducting our operations in a manner that is financially, environmentally, and socially responsible. This commitment is embedded in our governance structure and policy framework, ensuring oversight and guidance at every organisational level.

To uphold ethical and sustainable business practices, Advisense has implemented a robust policy framework along with clearly defined responsibilities outlined within these policies. Our policies shall be applied by all board members, employees, and relevant contractors of Advisense.

Sustainability Related Policies

- Sustainability Policy
- Code of Conduct
- Gender, Equality, Diversity & Inclusion Policy
- Work Environment Policy (and Employee Manual)
- Travel & Event Instruction
- Procurement Instruction
- Privacy Policy
- Whistleblowing Policy
- Information Security Policy
- Conflict of Interest Policy

The Board of Directors is accountable for overseeing ESG matters and sets the strategic tone and direction for our ESG efforts. The Sustainability Policy approved by the Board stipulates how ESG matters shall be addressed, including tracking ESG KPIs and producing the company's first Sustainability Statement in 2024.

The Group CEO has overall responsibility for day-to-day management in accordance with instructions and directives issued by the Board such as the Sustainability Policy, and is ultimately responsible for Advisense's progress on the ESG KPIs. The Group CEO has delegated the operational responsibility for the company's efforts within Sustainability to the CEO Office and the Sustainability Committee.

Led by the **Head of Sustainability**, our **Sustainability Committee** drives environmental initiatives and provides guidance on ESG reporting, including the implementation of new regulatory requirements. The Head of Sustainability reports on relevant developments related to internal sustainability work to the CEO, either through the CEO office or Group Management on a quarterly basis or more often if needed. The Head of Sustainability moreover

reports on material impacts, risks, and opportunities (IROs) to Group Management and the Board on an as-needed basis, at least annually.

Additionally, functions such as **Group Finance**, the **People Office** and our **Remuneration Committee** play important roles in our operational sustainability work.

Our People Office, led by our Chief People Officer, is responsible for policies relevant to gender equality, diversity and inclusion, and the work environment, as well as for creating awareness and providing information to new employees. Group Finance plays an important role in our sustainability efforts, particularly related to our ESG reporting to financiers and lenders, as well as our climate accounting. Advisense moreover has a Remuneration Committee that actively monitors our remuneration system to align employee incentives with client value and Advisense's growth. Advisense does not currently integrate ESG or climate-related factors into the remuneration of its administrative, management or supervisory bodies.



EU Taxonomy Assessment

As part of our environmental efforts, Advisense has initiated preparatory work for conducting EU Taxonomy assessments by assessing our potential eligibility and alignment status. In preparation for full CSRD-reporting, this exercise is a crucial step and simultaneously help raise internal awareness around the sustainability of our services. Advisense is closely monitoring the ongoing development of the EU Taxonomy and will continue to review our eligibility and alignment as we move forward.

Our Impacts, Risks and Opportunities

As a professional services firm, our operations center around human resources and our collective knowledge and expertise, which inherently has a limited direct impact on climate change.

Our climate accounting shows that our Scope 1 and 2 emissions account for 4,5% of our total emissions, with the majority of our emissions falling under Scope 3, which includes capital goods, purchased goods and services, business travel and commuting. While we strive to reduce emissions from these types of activities, described in further detail in the “Our Approach”, we recognise that

our greatest potential for impact lies in our client engagements. Many of our clients operate in the financial services industry, playing important roles in financing the green transition. By integrating sustainability considerations into our client engagements and advisory services, we can influence their practices. As an example, we assist clients in identifying and managing climate-related risks and opportunities in investments and loan practices, which in turn determines who has access to finance. In doing so, we can support broader systemic change towards a more sustainable and low-carbon economy.

Regarding climate-related physical risks, Advisense does not own physical buildings or equipment that could be directly affected by climate changes. However, our daily operations heavily rely on IT equipment, and this dependency introduces various risks. For instance, physical risks in regions producing vital components can disrupt the supply chain, leading to short-term shortages of critical parts. Additionally, unsustainable extraction and recycling practices may threaten the long-term availability of essential materials needed for manufacturing IT equipment. Moreover, the environmental footprint and energy consumption associated with the production, use and disposal

of IT equipment underscores the importance of our careful handling of such equipment.

Considering climate-related transition risks, we primarily view them as opportunities, and relevant in relation to our client engagements. For instance, we help businesses navigate policy and legal risks arising from the climate transition. It’s crucial to note, however, that failing to proactively address climate change, both internally and in our client interactions, could not only pose reputational risks but also undermine our position as trusted advisors.

Our Approach

In 2023, Advisense reinforced our dedication to tackling climate change by revising our Sustainability Policy and appointing a global Head of Sustainability. Our Sustainability Policy features a dedicated section on environmental stewardship which encompasses our internal operations, client engagements, and supplier relationships, demonstrating our holistic approach to environmental responsibility.

Climate change mitigation

2023 was the first year we gathered data on our Scope 1, 2 and 3 emissions

to produce a carbon accounting report covering 2022. This data allowed us to establish measurable targets for emission reduction, and following the publication of the report, Scope 1 and 2 emission reduction targets was submitted to and approved by the Science-Based Targets initiative (SBTi). The targets are in line with the goals of the Paris Agreement, aiming to limit global warming to 1.5 degrees Celsius and with the Sustainable Development Goal ‘Climate Action’ (SDG 13). We have also established targets for our scope 3 emissions.

Advisense’s emissions targets:

- **Scope 1 & 2:** 42% reduction in absolute emissions by 2030 from a 2022 baseline year (SBTi).
- **Scope 3:** Target: Reducing the combined absolute emissions from commuting and business travel by minimum 2% annually from a 2022 baseline year.

Our Sustainability Policy, along with our Travel & Event Instruction, serves as a comprehensive guide to Advisense’s approach and actions in reducing emissions. It encompasses a range of key activities, including reducing air travel, promoting sustainable commuting practices, implementing recycling protocols, and selecting eco-friendly alternatives for corporate events.

Although our initial efforts mark a positive starting point, we acknowledge the continuous need for improvement.

We are committed to refining and expanding upon our transition plan as we move forward, and in 2024, we will strategically work with defining relevant activities and priorities within our operations to ensure that we will meet our defined emissions-related targets. Moreover, we will adopt a concrete plan for ensuring that Advisense’s strategy and operations are compatible with the transition to a sustainable economy, limiting global warming to 1,5 °C in line with the Paris Agreement and the objective of achieving climate neutrality by 2050.

Examples of actions we will prioritise going forward include raising employee awareness and incentivise change, identifying decarbonisation opportunities related to purchases of goods, services and capital goods and auditing office energy efficiency to identify improvement opportunities.

Climate change adaptation

Advisense is committed to adapting to the actual and expected impacts of climate change. This commitment involves taking measures to deepen our understanding of associated risks and opportunities and with that, increasing

resilience against both our own risks and those of our clients, while also seizing opportunities.

It is important that we stay continuously ahead of the latest developments, regulations, and best practices, and we place particular emphasis on addressing transitional risks and opportunities related to regulatory, legal, market, and technological developments.

Going forward, we will focus on increasing employee knowledge of trends and the legal and regulatory landscape in order to help our clients navigate climate change risks.

Metrics and Reporting Principles

When reporting on our carbon footprint, we uphold stringent standards for calculating and reporting our GHG emissions, which encompass Scope 1, 2, and 3 emissions. Our methodology adheres closely to the GHG Protocol, a widely recognised standard for GHG accounting and reporting.

In 2023, we report an increase in CO2 emissions, primarily due to more precise data collection and operational changes following the merger of Transcendent Group and FCG (now Advisense), including multiple office relocations.

Energy Consumption	2023	2022
Total energy consumption related to own operations (MWh)	993.1	864
Total energy consumption from fossil sources (MWh)	828.4	555
Total energy consumption from renewable sources (MWh)	164.7	309
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	689.5	555
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	164.7	309
Percentage of renewable sources in total energy consumption	16.6%	35.76%
Percentage of fossil sources in total energy consumption	83.4%	64.24%

GHG emissions	2023	2022*
Scope 1 emissions (tCO2e)	86	0
Scope 2 emissions (tCO2e)	35	37
Scope 3 emissions (tCO2e)	1947	1348
Total GHG emissions (tCO2e)	2068	1385

*The availability of more accurate data during 2023 has led to a minor revision of previous GHG emission figures for 2022

Our Impacts, Risks and Opportunities

At Advisense, we recognise the importance of fostering a good and sustainable work environment for all. A positive workplace enhances employee morale, productivity, and satisfaction, thereby fostering a sense of belonging and motivating employees to perform at their best. Good working conditions also enhance our ability to retain and recruit top talent, improving our overall competitiveness.

Our employees are our greatest asset, and it is of utmost importance to cultivate a workplace that not only values and supports them but also upholds the highest standards of equality, diversity, and inclusion. This includes investing in their professional development through training and skills enhancement—an area where Advisense can positively impact our workforce while seizing opportunities for organisational growth. Indeed, our employees' expertise and growth is fundamental to our business success. [As our employees thrive, so does our business.](#)

While the well-being and development of our employees represent our greatest opportunity, it is also our most significant risk. We recognise that our

fast-paced business model provides both opportunities and challenges. While it fosters dynamic career growth and high employee engagement, we acknowledge the risk of long working hours and fluctuating workloads, which could challenge the harmony between professional and personal life. If we do not actively manage these risks, this can have significant negative impact on employees' physical and mental health. Failing to uphold good working conditions or allowing standards to decline not only has the potential to jeopardise our ability to attract and retain talent but also diminishes our productivity and overall competitiveness.

Our Approach

[Advisense is committed to providing the best working conditions, equal treatment and opportunities for all and investing in the development of our people.](#)

Our commitment to the well-being of our employees is reflected in our Sustainability Policy, Gender Equality, Diversity, and Inclusion Policy, Work Environment Policy and Code of Conduct. Advisense's workforce mainly consists of our employees, with occasional contributions from external

consultants. It's important to note that our policies and the information in this report includes all individuals who could be materially affected by Advisense, ensuring comprehensive coverage of stakeholders regardless of their employment status. Moreover, we pledge to uphold the UN Global Compact principles, focusing on human rights, labour, the environment, and anti-corruption, as outlined in our Sustainability Policy.

Advisense is committed to ensuring that the perspectives of our workforce are considered during decision-making processes. Our employee engagement strategy involves various channels, including direct interaction with employees, collaboration with workers' representatives, interviews conducted during materiality assessments, and bi-annual employee surveys followed by meetings to address feedback.

In 2023, we established Work Environment Groups in each country of operation that convenes at least every sixth months and reports to the Group Executive Committee. The purpose of these groups is to systematically ensure that Advisense, as an employer, provides opportunities for employees to participate in health, environment, and safety initiatives.

Furthermore, in 2023, we began implementing a new HR system named "HiBob." Moving into 2024, the utilisation of this system will provide us with a more comprehensive understanding of employee information, including gender, age, and other details.

Working conditions

Advisense's overall goal is that our work environment ensures good working conditions for all our employees, as outlined in our Work Environment Policy. Our aim is that every employee thrives and is able to develop both professionally and as individuals. We strive to create inclusive, meaningful and stimulating work where our employees are highly involved in the design of their own work situation and participate in the change and development of the workplace. We carefully consider all actual and potential risks to our employees and take the necessary actions to prevent any negative outcomes.

Advisense continuously ensures that managers are equipped with the knowledge to prevent and manage unhealthy workloads. This is achieved through various measures such as training, follow-up sessions, and appropriate resource planning. Although there will be intense periods from time to time, these should fluctuate over time

allowing employees' batteries to recharge. We also provide mental health support, coaching, and offer opportunities for rehabilitation during working hours. We encourage a healthy lifestyle and have agreements with training centers to provide employees with access to discounted training and promote health-promoting activities during social events. We furthermore offer healthcare and rehabilitation insurance through several occupational healthcare providers, providing employees with access to medical or psychosocial expertise when needed.

When consulting with our stakeholders on features related to our work environment, they generally express little concern regarding our working conditions but rather perceive AdviseSense as a company that is excelling when it comes to working conditions compared to our competitors. This is also reflected in high employee satisfaction scores and an eNPS above benchmark. AdviseSense is committed to ongoing improvement and will maintain focus and consistently seek ways to improve in order to uphold our reputation as an employer of choice.

Training and skills development

Continuous learning and development opportunities for all are of high importance at AdviseSense. We embrace

a value-driven, flat, and learning-oriented culture, firmly believing that it attracts and retains specialists. Hence, ensuring equal treatment in areas such as training, compensation, career development, and promotion opportunities, is imperative.

While the majority of learning occurs through day-to-day work and client assignments, AdviseSense actively fosters an environment of continuous professional development by providing opportunities for employees to enhance their skills and knowledge. A significant training budget is allocated and monitored at both local and global levels, with some training organised collaboratively.

Equal treatment and opportunities for all

At AdviseSense, we all have the same general rights, obligations, and opportunities, and this is reflected in our Gender Equality, Diversity and Inclusion Policy and Code of Conduct. We want to lead by example, and to succeed, we must recognise biases, and manage prejudices and social issues that affect not only AdviseSense but our industry and our society at large. We work actively to promote and improve gender equality and diversity, and do not accept any form of abusive discrimination.



It is important that our commitment is accompanied by meaningful actions. Therefore, AdviseSense has identified KPIs related to diversity and equal opportunities, and each year, we evaluate and update our goals in key areas, such as promotion, recruitment, parental leave, branding, leadership, and information and training.

Metrics and Reporting Principles

Data presented represent status at year end 2023. Employee data by gender and age are classified based on employees' self-reported gender and age as registered in our HR system. Employee turnover rate includes resignations and retirements. AdviseSense's top management is defined as the Global Executive Committee (GEC). The Board's gender diversity is calculated as an average ratio of female to male board members. In 2024, our new HR system, "HiBob," will provide more comprehensive data on various employee characteristics.

Employees	2023	2022
Number of employees (Head count) Sweden	312	326
Number of employees (Head count) Norway	41	59
Number of employees (Head count) Finland	33	28
Number of employees (Head count) Denmark	11	9
Number of employees (Head count) (Other)	27	24
Total Employees (Head count)	424	446
Employees who have left and turnover	2023	2022
Number of employees who have left undertaking	106	74
Percentage of employee turnover	25	16
Board and Management	2023	2022
Number of executive board members	2	2
Number of non-executive board members	5	5
Percentage of independent board members	43%	43%
Number of members at top management level (GEC)	15	15
Percentage of employees at top management level	3.5%	3.4%
Board's gender diversity (percentage of women)	43%	43%
Health and safety	2023	2022
Long-term sickness (% of total number of employees)	0.94%	0.22%

Our Impacts, Risks and Opportunities

At Advisense, we recognise the negative impacts associated with ethical violations and regulatory non-compliance, understanding that these can have long-term consequences on society or affected individuals. Therefore, we have made it our mission not only to strive for excellence in our own operations but also to enhance business conduct for our clients. Our efforts in key areas, including combating money laundering and financial crime, reducing the risk of corruption and bribery, avoiding conflicts of interest, and enhancing decision-making, are integral to our professional services and reflect our dedication to providing societal value. However, any involvement by Advisense in breaches related to ethical violations or regulatory non-compliance not only carries the risk of financial penalties and sanctions but also jeopardises our reputation and undermines our credibility as trusted advisors. We believe that our expertise in this field uniquely positions us to implement robust governance structures for both ourselves and our clients, and with that, transform potential risks into opportunities for positive impact.

Information is one of Advisense's most important assets. Given our role as advisors, Advisense handles sensitive and confidential information daily. We understand that any breach in safeguarding this information puts both clients and end-users at risk, and that breaches can have serious

negative impacts on businesses and individuals. Additionally, deficiencies in the protection or improper use of IT systems can lead to serious consequences for our own business, such as direct costs or impaired client relations and trust. However, by using our expertise in this field, we not only safeguard our own data but also provide valuable assistance to clients in enhancing their own data security and privacy measures. Therefore, we view these challenges not only as risks but also as opportunities.

Our Approach

Corporate Culture

Our commitment to foster and safeguard a culture of ethics and integrity is reflected in our guiding documents and policies for Corporate Governance, Whistleblowing, Tax, Conflict-of-Interest, and our Code of Conduct. These policies communicate the fundamental basis for communicating our expectations and responsibilities around compliance and are crucial for maintaining integrity within our organisation. Our internal governance and controls are directly linked to these policies and emphasise practices to build environmental and social resilience for our clients, society, and employees.

To ensure awareness among all employees, we provide training in our Code of Conduct, which includes case studies to help individuals navigate different situations. We integrate our values into all aspects of

our operations, including the onboarding process, salary setting, and levelling. Furthermore, we conduct risk assessments and have established KPIs to ensure continuous monitoring and adherence to our policies and procedures. By demonstrating commitment to ethical practices in all aspects of our operations, we aim to promote a good corporate culture, mitigate the risks associated with ethical violations, regulatory non-compliance, and reputational damage, while also enhancing our credibility when advising clients on similar matters.

Data Security and Privacy

At Advisense, we have implemented a Data Security and Privacy framework to ensure the protection of personal and classified information. This framework includes our Privacy Policy, Information Security Policy, and IT policy.

To mitigate the risks of breaches, we uphold practices, ensuring compliance with our legal obligations. Our approach is risk-based, taking into account external factors and identified risk areas. Aligned with the fundamental principles of the GDPR, our data protection framework encompasses clear procedures for data processing by maintaining our Record of Processing Activities, identifying when a Data Protection Impact Assessment is needed, and we ensure that our processors assume responsibility for the personal data they process. We address cyber security risk according to information security standards and frameworks and conduct annual IT risk

assessments, evaluating their impact on information security.

All employees participate in Advisense's IT security training where the aim is to raise awareness and reduce the risk of data breaches, IT attacks, business interruptions or crime which could harm Advisense, our employees, clients or other stakeholders. In 2023, we did not experience any cyber-attacks, and only minor privacy incidents of which none required reporting to supervisory authority.

Raising concerns

Advisense is committed to ensuring transparency and a culture within our organisation where employees are encouraged to, and feel that it is safe to raise and report concerns related to any perceived or actual breach of local laws and regulations, Advisense policies, or any other unethical conduct within our premises, operations, or in relation to our clients or other third parties. Advisense has a Whistleblowing Policy outlining procedures for how to report and raise concerns internally, clearly communicating the right to raise concerns anonymously and the protection against any form of retaliation.

In 2024, Advisense will commence the search for an external provider to establish a whistleblowing IT-system to digitalise and further strengthen our procedures. This system will ensure compliance with relevant legislation, prompt investigation of reports by independent and competent resources,

and protection against retaliation. Accessible via our intranet and website, it will serve employees, third parties, and external stakeholders alike. Our goal is to have the updated whistleblowing policy communicated to all employees including third parties, and the system effectively implemented, tested, and operational by 2025.

Corruption and bribery

At Advisense, our commitment to ethical business conduct runs deep. We maintain a zero-tolerance policy toward corruption, bribery, extortion, fraud, and embezzlement, whether involving our team members, suppliers, or partners. Additionally, we expect our suppliers and partners to actively combat illegal financial activities such as money laundering, tax fraud, and tax evasion. So far, regular assessments of operational risks have not raised significant concerns regarding fraud and corruption. This can likely be attributed to the nature of our operations, our geographical scope and the composition of our client base. Our employee expertise in areas such as fraud prevention and implementing sound anti-corruption procedures, may be our greatest asset when it comes to avoiding corruption and bribery.

While our risk level is relatively low or moderate compared to industry standards, we recognise the impossibility

of eliminating all risks. Thus, we continually enhance our management systems and focus on mitigating and managing potential risks effectively.

Conflicts of interest

At Advisense, we uphold strict standards to ensure that employees avoid engagements where conflicts of interest may arise and entrust our employees with upholding our conflict of interest procedures with expertise and competence in their day-to-day activities. We have established procedures to regularly identify any conflicts of interest, as outlined in our Conflict of Interest Policy. This policy undergoes an annual review, during which material conflicts of interest are assessed and documented in a registry appended to the policy.

At all Advisense Board meetings, identifying conflicts of interest is a standard agenda item. While no conflicts of interest were identified in 2023, historical instances have demonstrated the importance of this practice and the importance of remaining vigilant.

Metrics and Reporting Principles

Non-compliance cases are normally reported via our whistleblowing channels. Data presented represent status at year end 2023.

	2023	2022
Number of identified incidents of corruption or bribery	0	0
Financial and in-kind political contributions made	0	0
Number of GDPR/information security incidents	0	0

This report is developed by the ESG & Sustainable Finance Team at Advisense.

For further information about the report and our sustainability performance, please contact Head of Sustainability, Annik Cecilie Saxegaard Falch at annik.falch@advisense.com.

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