



Billogram's Commitment to Sustainability

Communication on Progress Report 2024

Did you know that a digital invoice generates 87% less CO₂ emissions compared to a paper invoice?

By the end of 2024, over 80% of all invoices sent via our platform were fully digital. By digitizing invoicing and payments, we help companies reduce their environmental impact, improve customer relationships, and create more sustainable financial processes. Together, we contribute to a socially, environmentally, and economically sustainable future.

At Billogram, our understanding of sustainability is comprehensive. It extends beyond our environmental impact to fully embrace our commitments as a responsible tech employer and our role in fostering a healthy, sustainable economy. We contribute to this broader economic well-being by designing solutions engineered to proactively prevent payment issues. Through features such as timely due date reminders, flexible payment options, and intelligent dunning processes, we help our clients create lasting customer relationships built on positive engagement and trust, rather than reliance on late fees or aggressive debt collection tactics. This approach culminates in a fairer payment experience that not only strengthens customer loyalty but also reduces the risk of financially vulnerable individuals falling into harmful debt spirals.

As we empower businesses across Europe to operate more sustainably with our unified digital solution, we also hold ourselves to these same high standards in our daily operations. At Billogram, this means we utilize energy-efficient data centers, source green electricity for our office, and opt for rented furniture to promote resource circularity. We are dedicated to minimizing business travel and ensuring maximum efficiency for any journeys that are essential. Furthermore, we consciously select partners who align with our core sustainability values. Finally, after all other viable reduction measures have been implemented, we offset the carbon emissions from unavoidable flights and from any paper invoices still being sent through our service.

This is an ongoing journey, and we are proud to share our progress, outline our ambitions, and detail the actions we are taking. Our core conviction is that it pays off to treat people well, so we firmly believe that sustainable business is the future. It is our sincere hope to inspire others to join us in this endeavor.

Billogram's Communication on Progress report outlines our ongoing sustainability journey - we are proud to share our progress, outline our ambitions, and detail the actions we are taking.

Jonas Suijkerbuijk, CEO



Our Ambitions

Billogram holds ambitious goals for sustainability and ESG (Environmental, Social, Governance). Through diligent measurement and continuous improvement, we ensure our business practices not only align with global standards for responsible corporate conduct but, crucially, also resonate with our conviction, core values and our commitments to customers, partners, employees, and society at large.

Our dedication is further demonstrated by our active support for key global initiatives, including the United Nations (UN) Global Compact and the Science Based Targets initiative (SBTi). As a participant in the UN Global Compact, our commitments include an annual CEO-endorsed letter affirming our dedication to its ten principles, and the submission of a Communication on Progress (CoP) report, which this document represents.

Committed to Global Initiatives

The SBTi

is a collaboration between CDP, the UN Global Compact, the World Resources Institute (WRI), and the World Wide Fund for Nature (WWF). SBTi guides companies in addressing the climate crisis since it enables organizations to set greenhouse gas (GHG) emissions reduction targets consistent with limiting global warming to 1.5°C.



March 2024 – Billogram's near-term targets were validated by the SBTi.

The UN Global Compact

champions corporate sustainability in alignment with the UN's 2030 Sustainable Development Goals (SDGs). It promotes responsible business practices through its Ten Principles, which span human rights, labor standards, environmental protection, and anti-corruption efforts.



February 2023 – Billogram became a member in the UN Global Compact.

EcoVadis

provides independent, comprehensive sustainability assessments, evaluating corporate performance across four key themes: Environmental Impact, Labor & Human Rights, Ethics, and Sustainable Procurement.



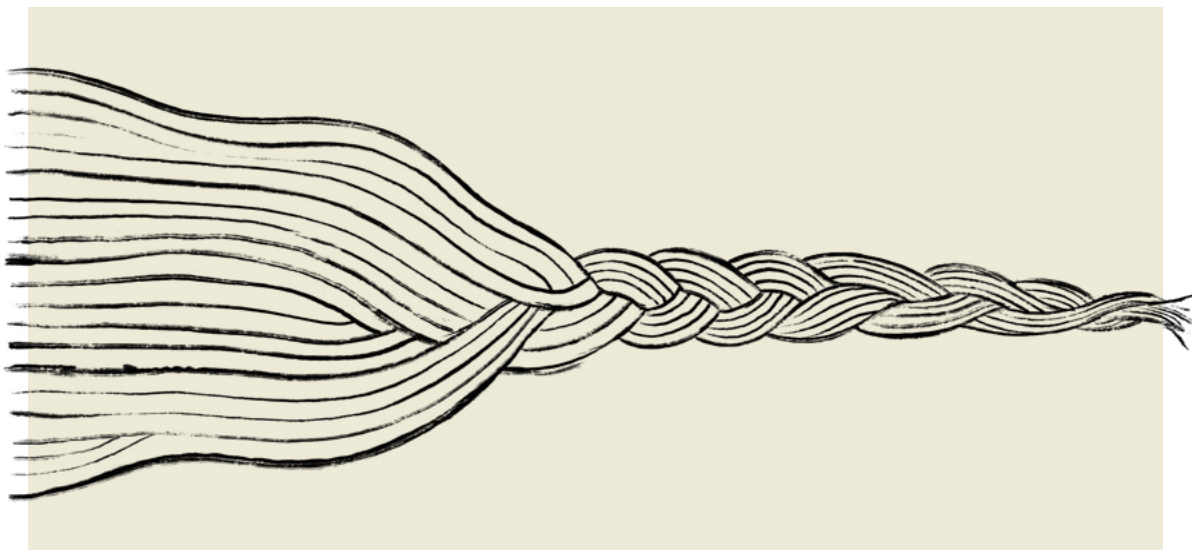
January 2022 – Billogram published its first EcoVadis scorecard. We are currently awarded a bronze medal (Feb 2024).

Implemented Management Systems

To ensure a systematic approach and continuous improvement across our sustainability efforts, Billogram's projects and operations are structured around four key management systems. * Each system is tailored to address critical aspects of our operations and impact:

- **Environmental Management:** We address our environmental impact through an Environmental Management System designed in accordance with the ISO 14001 standard. This system guides our efforts to minimize our environmental footprint.
- **Occupational Health and Safety:** Our commitment to robust labor practices and the well-being of our employees is managed via an Occupational Health and Safety Management System aligned with the principles of ISO 45001.
- **Information Security:** The security and integrity of all data and information are governed by our Information Security Management System, which adheres to the comprehensive ISO 27001 standard.
- **Quality Management:** Our Quality Management System, aligned with ISO 9001, is central to our dedication to minimizing unpaid bills and enhancing customer satisfaction. This management system ensures the delivery of a high-quality product that meets customer expectations and improves their overall experience. Importantly, it also contributes to a fairer financial ecosystem by significantly reducing the number of invoices that proceed to debt collection, thereby lessening the number of individuals encountering debt difficulties.

* Our management systems are developed in alignment with the corresponding ISO standards (ISO 14001, ISO 45001, ISO 9001, and ISO 27001); however, they are not yet formally certified.

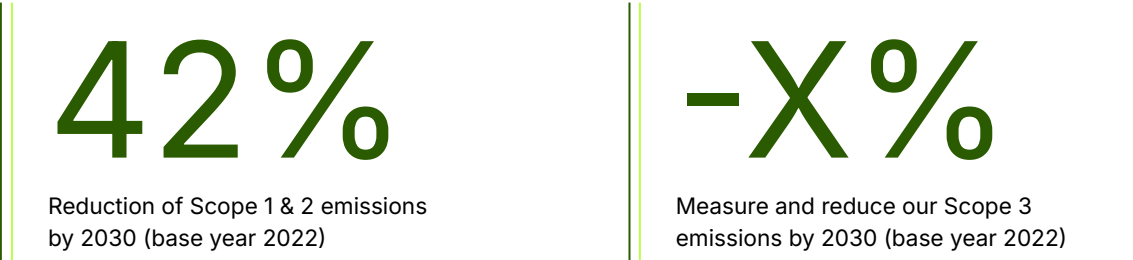




Environmental Targets

At Billogram, we are committed to minimizing our environmental footprint and actively promoting sustainable development. Addressing our environmental impact through proactive and measurable strategies is a core priority. Our approach is underpinned by our commitment to the Science Based Targets initiative (SBTi), with our environmental targets primarily focused on business travel and further reducing the carbon footprint associated with invoicing. In addition to these primary focuses, we are dedicated to the ongoing reduction of our energy and resource consumption and the minimization of waste generation across all our operations.

SBTi Validated Climate Targets



Status Update on Scope 1 and 2 Emissions 2024

Billogram maintained its status of zero Scope 1 emissions throughout 2024, consistent with previous reporting periods. For Scope 2 emissions, Billogram achieved a 19.7% reduction by the end of 2024, compared to the 2022 baseline year.

Comment on Scope 2 Emissions

The original Scope 2 emissions for 2022, related to district heating, were calculated using average consumption values (kWh). For 2023 and 2024, however, emissions are based on actual consumption data from Billogram's office, which is significantly lower than the average. This means that the year-over-year comparison with 2022 does not accurately reflect the change in emissions. To ensure a fair comparison, actual consumption data for district heating in 2022 has now been retrieved. Even when applying this comparable activity data, it becomes clear that Scope 2 emissions have decreased substantially (19.7%).

This is shown below:

Year	Scope 2 (kgCO2e)	Change	Note
2022	4966	—	Original for 2022
2022	2436	Base year	Actual Consumption Data
2023	2072	-14,9%	
2024	1957	-19,7%	

Since Scope 2 emissions represent only a very small part of Billogram's total climate impact (0.2% in 2024), we have made the decision that this minimal share does not warrant a formal reapplication or base year revision of our current SBTi-approved climate targets. The strategic priority will continue to be the reduction of Scope 3 emissions, which constitute the vast majority of our company's footprint.

Status Update Scope 3 Emissions 2024

Billogram's Scope 3 emissions increased by 15.7% in 2024 when compared to the originally reported 2022 base year data. However, since that initial reporting, the calculation methodology has been significantly refined to enhance accuracy and better align with GHG Protocol guidance. Applying this more precise methodology to the 2022 data shows an increase of 41.4% for the 2024 period.

While this difference is notable, Billogram has strategically decided to postpone a formal base year revision of its existing SBTi-approved climate targets at this time. This decision is based on further methodological improvements that are currently underway.

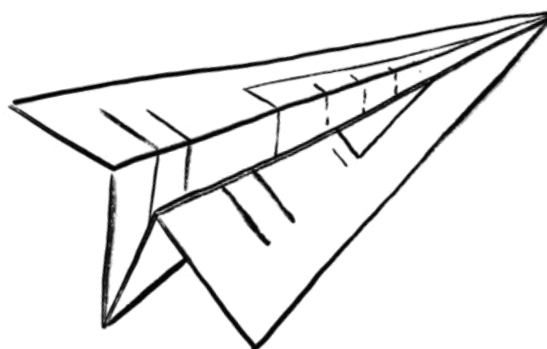
Throughout the coming year, Billogram's emissions data partner, GoClimate, will continue a phased transition from spend-based to more accurate activity-based data, while also implementing more precise emission factors. Billogram believes it is more prudent to consider a single, comprehensive base year revision after these significant refinements are complete. This will ensure the most stable and accurate baseline for tracking future progress, and the decision will be reviewed again for the next reporting period.

Comment on Scope 3 Emissions

While Billogram's mission is to digitize invoicing, a significant number of physical paper invoices still need to be delivered. The transportation and distribution of these postal invoices represent Billogram's largest source of Scope 3 emissions. In 2024, we observed a notable increase in these freight-related emissions. This rise is attributable to a combination of internal growth and external environmental factors.

- **Internal Factors:** Billogram experienced a 24% increase in the total number of invoices processed in 2024. Consequently, even as our share of fully digital invoices grew from 78.41% to 80.81%, the absolute volume of postal items dispatched through our service increased.
- **External Factors:** A key external driver for the heightened emissions intensity was the substantial decrease in Sweden's biofuel reduction mandate. This governmental policy change has led to a decreased proportion of biofuels blended into diesel, thereby increasing the carbon emissions associated with diesel use, which directly impacts freight.

To enhance the accuracy and granularity of our Scope 3 emissions data, Billogram is proactively engaging with its main print and postal distribution partner to gather more detailed information on fuel composition and transportation-specific emissions. Such improvements in data quality will enable us to more effectively track, analyze, and ultimately work towards mitigating emissions from upstream transportation and distribution connected to the Scope 3 emissions.



Enhance Digitalisation

Billogram’s Scope 3 emissions are predominantly linked to the print and distribution of postal invoices. Therefore, providing a digital-first service is a cornerstone of our environmental sustainability commitment. This approach directly reduces paper consumption and the carbon footprint from traditional postal distribution. A primary strategic objective for Billogram is thus the continued and enhanced digitalization of our clients’ invoicing and all related communication processes.

84%

Fully digitized recipients (not having any postal invoices) sent through our service by the end of 2025.

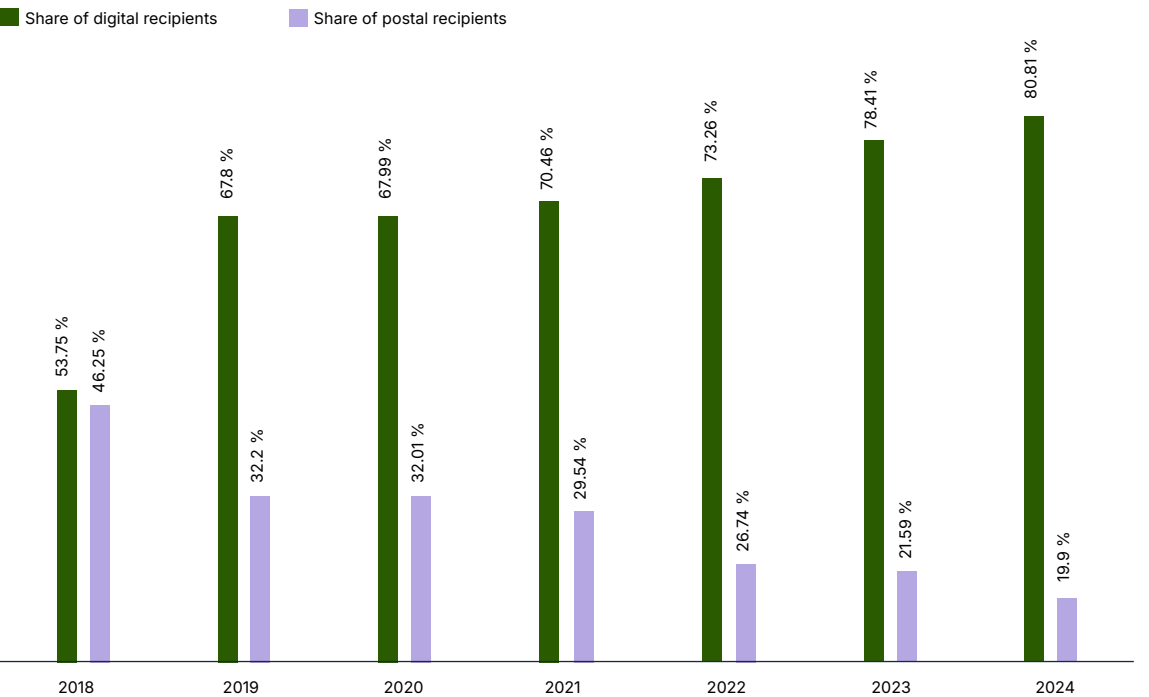
2024 Achievement: Surpassing Our Digitalization Target

By the end of 2024, we successfully ensured that 80.81% of our clients’ recipients were fully digitized, thereby exceeding our target of 80%. This milestone signifies that these recipients received all communications from our clients—including original and updated invoices, credit notes, payment reminders, and other notifications—exclusively through digital channels, with no items sent by post.

Increased Ambition: Our Target for 2025

For 2025, we are raising our ambition and have set a new target of achieving 84% fully digitized recipients. This reflects our ongoing commitment, even as we focus on onboarding new international customers who, at the initial stages, often have a higher reliance on postal invoices. By collaborating closely with these new clients, Billogram is actively working to progressively transition their communication processes to digital, thereby aiming to unlock significant positive environmental impacts together over time.

Development 2018—2024



The Digitalization metric is the share of recipients for whom Billogram has distributed invoices and where none of the invoices were distributed as a letter. The distributions considered include the original invoice, an updated invoice, a resend of an already distributed invoice, a credit invoice, a soft reminder, or a reminder invoice. Digitalization or to digitalize essentially means eliminating the need for sending invoices as letters. The metric does not differentiate the cause of digitalization, whether it's driven by product features or by initiatives from our Client Success Managers or other teams.

Optimise Business Travel

Yearly Average

3

*meetings per
business trip*

Following freight emissions from postal distribution, business travel represents Billogram's second most significant source of scope 3 emissions. While our ongoing international expansion presents challenges to reducing business travel, we remain firmly committed to minimizing its environmental impact.

Our travel policy prioritizes virtual collaboration, with web meetings always being the first option. When travel is unavoidable, particularly for long distances, we adhere to a clear hierarchy: trains are preferred, followed by air travel, and then cars. For any necessary flights, we prioritize direct routes to lessen their environmental impact.

A key component of this strategy is maximizing travel efficiency. The target for 2024 was to achieve an average of three substantive meetings per business trip. The outcome for the year was an average of 2.7 meetings per trip. Billogram has identified that internal data reporting on meeting counts can be improved. With a renewed focus and enhanced data collection procedures, we believe the target of three meetings per trip remains both ambitious and achievable, and has therefore maintained it for 2025.

Furthermore, Billogram diligently tracks and compensates for the carbon emissions from any air travel that is still necessary.

Reduction of Energy Consumption

At Billogram, our Scope 2 emissions are primarily associated with the energy consumed in our operations. We have a long-standing commitment to using 100% green, renewable electricity in our office. In 2024, we deepened this commitment by transitioning to a new provider that not only supplies 100% green energy but also donates all its profits to charitable causes. This change further reinforces our dedication to both environmental stewardship and social responsibility.

Remain

100%

*Green renewable electricity in our
office over time.*

With our electricity use fully covered by green energy, Billogram's remaining Scope 2 emissions stem almost entirely from district heating. Our provider, Stockholm Exergi, is making significant strides in decarbonization, particularly through its development of bio-CCS (Carbon Capture and Storage for biogenic emissions). Their notable progress during 2024 in establishing the world's first full-scale bio-CCS facility is very promising, as this technology holds the potential to generate negative emissions. This initiative, along with others from Stockholm Exergi, has the potential to further reduce Billogram's climate impact over time.

Furthermore, ongoing energy efficiency initiatives within our office building, led by our landlord Newsec, contribute to reducing our overall energy demand. For example, a comprehensive window replacement project undertaken in the building during 2024 is helping to lower our energy consumption and associated emissions.

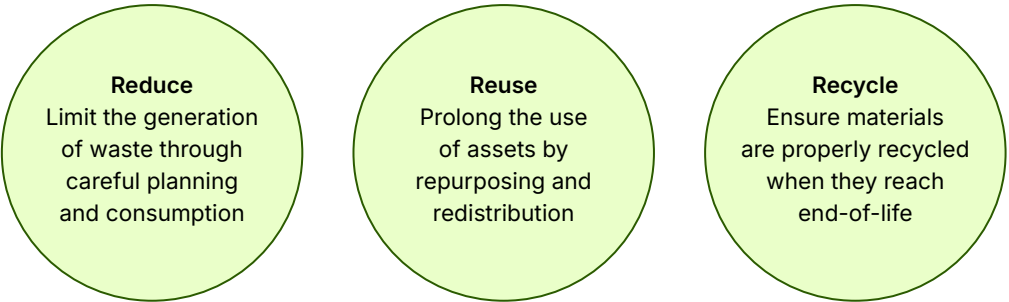
Reduction of Waste and Resource Utilization

In 2024, we strengthened our commitment to sustainable operations by implementing practical measures to reduce waste, optimize resource use, and enhance environmental performance. Our focus remained on driving circularity and minimizing our overall environmental footprint across the organization.

- **Upgraded Waste Sorting Infrastructure:** We introduced new, clearly labeled waste stations across the office to simplify and improve the accuracy of waste sorting. This enhancement supports responsible waste handling and strengthens employee compliance with our environmental guidelines.
- **Sustainable Asset Management:** We continue to lease office furniture rather than purchase new, reinforcing our commitment to a circular resource model. This approach reduces the environmental impact associated with manufacturing and transportation and extends product lifecycles.

Waste Management and Resource Efficiency

Our waste reduction strategy remains anchored in the principles of Reduce, Reuse, Recycle:



Hazardous Waste: A Marked Reduction

In 2024, we achieved a significant reduction in hazardous waste, reporting only 15 kilograms, down from 36 kilograms in 2023—a decrease of more than 50%.

Importantly, none of this waste came from IT equipment. Through effective internal redistribution, all obsolete IT hardware was successfully given a second life within the organization. The only hazardous item disposed of during the year was a non-repairable coffee machine. This outcome reflects our ongoing commitment to asset longevity, reuse, and waste minimization.

Stay below

0,015

tons of hazardous waste during 2025

Carbon Offsetting as a Final Measure

While our primary focus remains on reducing emissions at the source, we recognize that certain emissions are currently unavoidable. For these, we implement climate compensation as a last resort, continuing to offset all paper invoices processed through our platform and all essential business-related flight travel.

Climate Compensation Project: Efficient Cookstoves in Burkina Faso

As part of our climate compensation strategy, we support the Efficient Cookstoves project in Burkina Faso, which provides households with access to clean, fuel-saving stoves that replace traditional open-fire cooking. These stoves dramatically reduce harmful smoke emissions, lower fuel consumption, and ease the burden on forests—all while improving health outcomes, especially for women and children who are most affected by indoor air pollution.

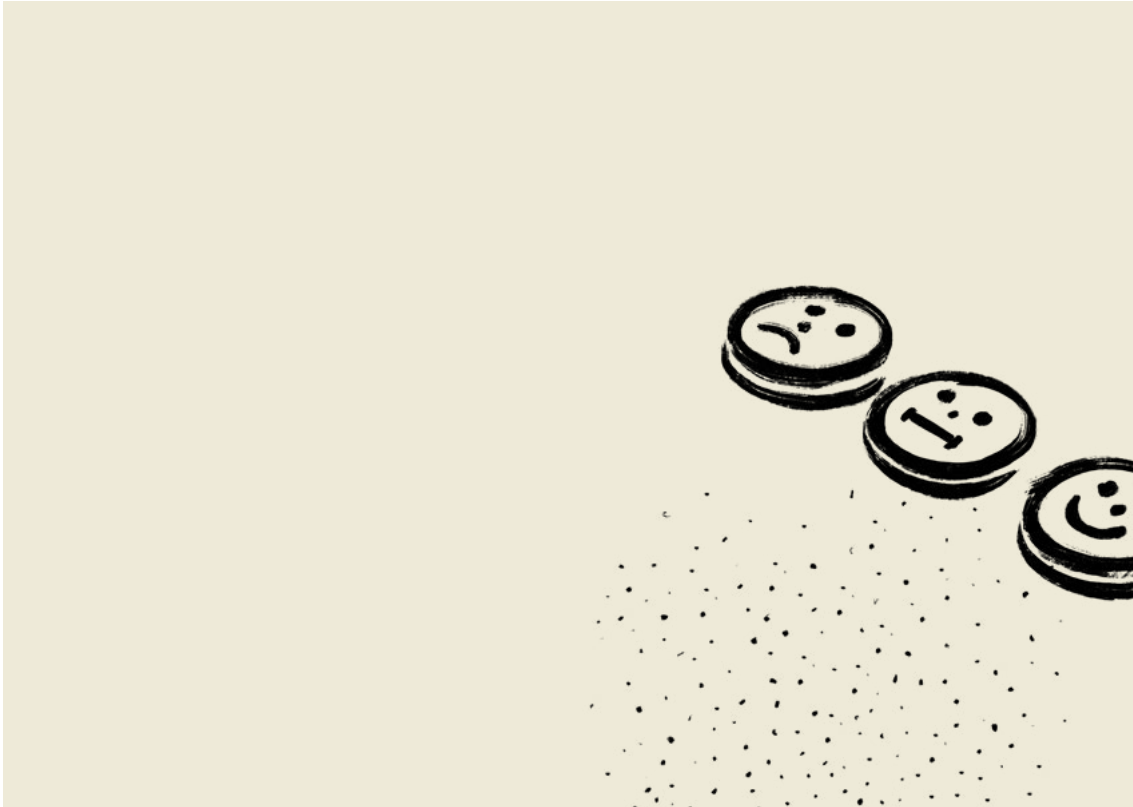
For us at Billogram, this project exemplifies the principle that drives everything we do: we believe that it pays off to treat people well. This belief extends beyond our product and customer relationships—it also shapes how we approach our environmental responsibility. Supporting this project means not only reducing carbon emissions but also investing in better living conditions, safer homes, and greater dignity for communities facing systemic challenges.

While we work toward eliminating our remaining emissions—such as those linked to legacy paper-based processes—we choose to partner with initiatives that deliver both climate integrity and human impact. The project is certified under the Gold Standard, ensuring measurable, high-quality carbon reductions with strong co-benefits.

By funding clean energy access in Burkina Faso, we're not just offsetting emissions—we're backing a future where climate action and human well-being go hand in hand.

Climate Report

For detailed information on our measured climate footprint, please download our Climate Reports for 2022, 2023 and 2024 at billogram.com.



Targets on Labor

At Billogram, we believe a great workplace is built by perfecting what matters most: how we support our people. We provide equal opportunities and strive for an inclusive and diverse work environment since we believe this is key to our continuous success. In 2024, we didn't chase shiny new ideas—instead, we polished our core programs to make every start, workday, and goodbye better. From sharper onboarding to fairer hiring, here's how we leveled up labor practices during the year.

Employee Engagement

Ensuring every Billogrammer feels heard and valued is a guiding principle at Billogram. We therefore conduct bi-weekly Pulse Surveys to gauge the organization's atmosphere. The Employee Engagement Score (EES) is a key indicator of our organization's health and our effectiveness as an employer. It is our most vital metric for assessing employee satisfaction and well-being. This comprehensive metric encompasses feedback and communication, perception of strategy and culture, clarity of goals and expectations, learning and development opportunities, autonomy, meaningful participation (including non-harassment), workload, health, workplace conditions, work tools & systems, as well as relationships with managers and colleagues.

Target

4,2

Employee
Engagement Score

In 2024, we enhanced our employee engagement surveys with more precise questions and more agile follow-up procedures. These improvements contributed to an excellent participation rate of 73% and an overall Employee Engagement Score of 4.1 (out of a maximum 5.0). This achievement not only places Billogram above 70% of companies in our benchmark group but also signifies consistent progress from our 2023 score of 4.0 and our initial baseline of 3.9 recorded in October 2022. We have a continuous goal that our Employee Engagement Score should average on 4.2 by the end of 2025.



Tolerance for Harassment

For 2025, Billogram reinforces its unwavering commitment to a workplace free from harassment. Our absolute target is zero incidents related to harassments, underpinned by a strict zero-tolerance policy.

Gender Diversity*

In 2024, we saw the effects of our focused efforts to strengthen gender balance in leadership. The proportion of women in management roles increased to 48%, approaching an equal split, while representation in the executive management team rose from 33% to 43%.

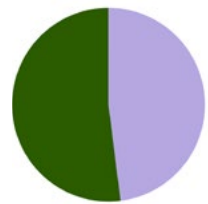
To build on this momentum, we are continuing our commitment to ensuring equal gender representation across all leadership levels, with a specific focus on further increasing representation within the executive team and the company as a whole. Our long-term ambition remains to reach 50% overall female representation.

Our primary strategy to achieve this is to target 50% women among all new hires. This is supported by our talent acquisition team's proactive outreach to female candidates and by maintaining an unbiased, competency-based recruitment process, including dedicated training for all hiring managers. These recruitment initiatives, combined with supportive policies like flexible work arrangements and a parental pay top-up, are essential in fostering the inclusive environment we are committed to building.



Overall organisation

33% women
67% men



Managers

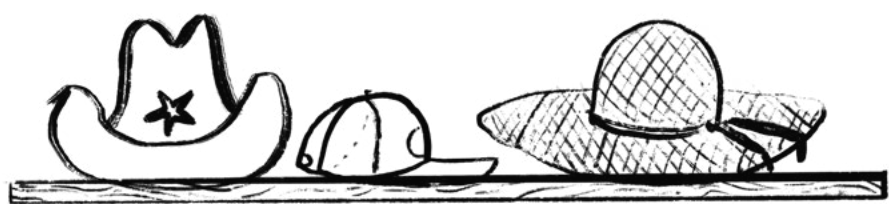
48% women
52% men



Executive Management

43% women
57% men

* All gender diversity statistics presented in this report are based on employees only and do not include data for consultants.



Cultivating a Fair and Empowering Workplace

At Billogram, we believe a great workplace is built by perfecting the things that matter most. In 2024, our focus wasn't on launching brand new programs, but on thoughtfully improving and strengthening the core processes that define the entire employee journey. From fairer hiring and more inclusive leadership to making every start and goodbye count, here's a look at the key labor focus areas we've enhanced this year.

Closing Gaps, Lifting Everyone

Fair pay and opportunity are core principles at Billogram. In 2024, we continued to advance gender representation, achieving 48% women in leadership positions. To reach our long-term target of 50% overall female representation, our strategy is to target 50% women among all new hires. In parallel, our 2024 salary analysis, conducted in preparation for the EU Pay Transparency Directive, confirmed a continued reduction in the gender pay gap. While this marks tangible progress, we acknowledge our work is ongoing and remain dedicated to achieving full equity.

Making Every Start and Goodbye Count

Starting at Billogram should feel like joining a team that's got your back. That's why we fine-tuned our Buddy Program in 2024, giving new hires, especially leaders, a buddy to guide them through their first months. With regular check-ins, a slick onboarding flow, and a "Success Plan," newbies told us they felt at home faster, like they'd found a work bestie.

We also revamped our exit process to make goodbyes as respectful as hellos. Standardised steps, clear handovers, and heartfelt check-ins ensure everyone leaves with dignity and appreciation. We know that transitions matter, and we're proud to get both ends right.

Empowering Leaders to Shine

Great teams need great leaders, so we doubled down on training our managers in 2024. We rolled out fresh leadership workshops, focusing on everything from inspiring teams to nailing fair recruitment. Our hiring managers also got new tools, like structured interview guides and Talendary for smarter sourcing. With 86% of hires coming through our in-house process, we've made recruitment sharper and more inclusive. These upgrades show we're hungry to keep growing together.

Hiring Fairly, Welcoming All

Fair hiring is about finding people who'll thrive, no matter their background. During 2024, we perfected our competency-based approach, sprucing up our career page with real team stories and launching six Jobcast episodes—think candid chats about life at Billogram. We're thrilled to share our culture with candidates, and it's paying off with a more diverse talent pool. Our Equality & Diversity Policy keeps us grounded, ensuring zero tolerance for discrimination and equal shots at every role.

By refining these fundamental areas throughout 2024, we have reinforced our commitment to building a truly supportive, fair, and empowering workplace for every Billogrammer.



Human Rights and Social Impact

Beyond our goals for employee engagement, well-being, and fostering diversity and inclusion, Billogram is deeply committed to safeguarding fundamental labor standards and universal human rights through robust policies and targeted initiatives.

Fundamental Labor and Human Rights

Fair Working Conditions

We ensure fair working conditions by basing all employment decisions solely on competence, experience, and performance. Our working hours and remuneration comply with all applicable laws, and we uphold the principle of equal pay for equal work. All employees are treated with respect, and we provide reasonable notice and fair procedures prior to any contract termination.

Freedom of Association

Billogram respects and upholds the right of all employees to freedom of association and collective bargaining. This includes their right to form, join, or not join labor unions and to choose their own representatives. We ensure that no employee faces discrimination or retaliation based on their choice in this regard.

Non-Discrimination and Harassment

We actively promote a culture of equality and strictly prohibit any form of discrimination or harassment based on grounds such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, disability, age, sexual orientation, gender identity, or any other status. Billogram is committed to maintaining a workplace entirely free from intimidation, bullying, and harassment, where all individuals treat one another with dignity and respect.

Diversity and Inclusion

Diversity and inclusion are integral to our company culture and success. We strive to build a workforce that reflects societal diversity and actively foster an inclusive environment where collaboration thrives and all voices are heard and valued. By supporting flexible work arrangements and embracing diverse perspectives, we aim to drive innovation and create a sense of belonging for everyone.

Health and Safety

The health, safety, and well-being of our employees are paramount. We are committed to providing a safe and healthy work environment that meets or exceeds statutory requirements. Our approach addresses both physical and mental well-being through proactive risk assessments, preventative measures, comprehensive training, and the maintenance of a drug-free workplace. We further support our employees' overall well-being by promoting work-life balance through flexible working arrangements and targeted health initiatives.

Human Rights

Billogram unequivocally supports internationally recognized human rights (e.g., UDHR, ILO conventions) and is vigilant in preventing any human rights violations within our own operations and value chain. We maintain a zero-tolerance policy towards child labor, all forms of forced or compulsory labor (including debt bondage and human trafficking), and any form of physical or psychological punishment or coercion.

Social Impact

As part of Billogram's broader commitment to human rights and social well-being, we actively address the significant societal issue of growing personal indebtedness in Sweden. Billogram challenges traditional debt collection models, where high fees can disproportionately impact vulnerable individuals and create damaging debt spirals.

Billogram's conviction is that punitive fees in general are counterproductive. Instead, its platform empowers clients to avoid formal debt collection by using empathetic and effective digital tools like soft reminders and personalized communication. This proactive approach helps businesses secure timely payments through positive engagement, strengthening customer relationships while protecting end-consumers from financial hardship.

Our Actions and Progress in 2024

In line with our philosophy of creating fairer financial interactions, we continued to enhance our Smart Dunning process throughout 2024 to make collections more customer-friendly.

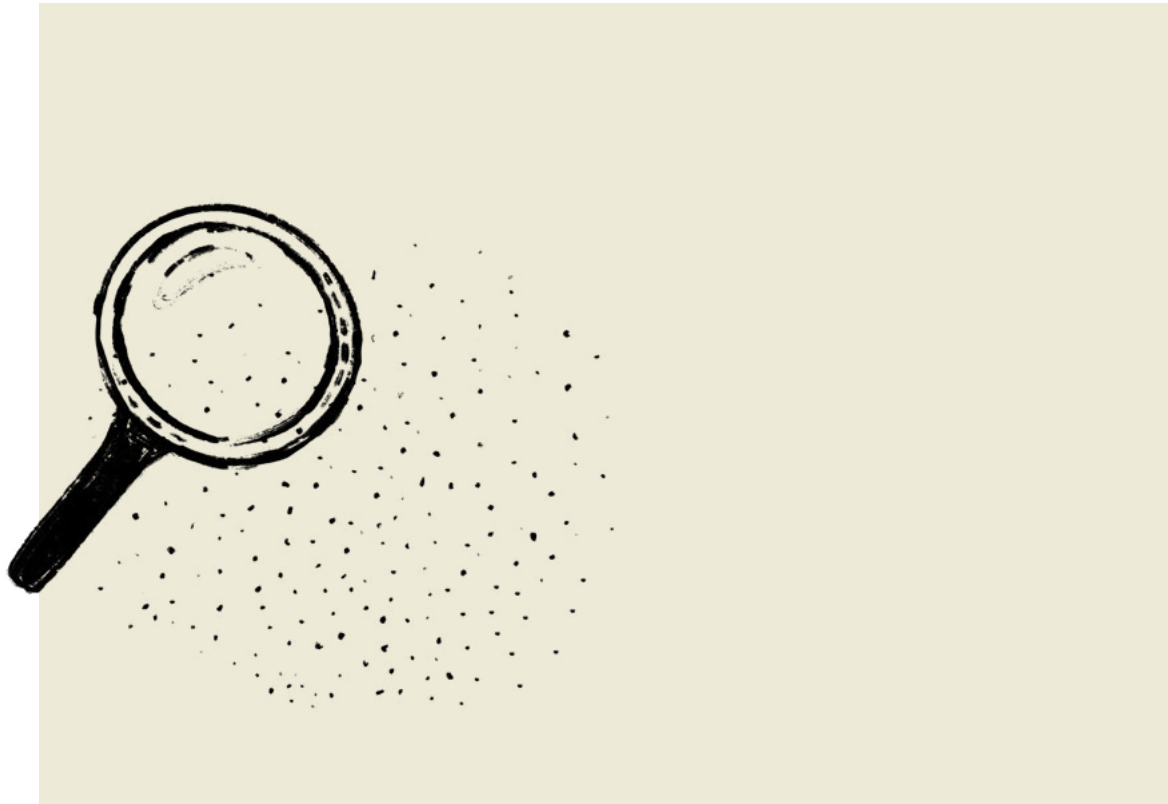
Our primary focus was on building upon our existing Soft Reminders feature. We conducted a large-scale experiment to measure the impact of sending these reminders on an invoice's due date. The results were compelling: this single action led to 45% fewer formal reminders being issued and resulted in both higher and faster payment rates. This directly helps end-customers avoid extra fees and lowers their risk of entering debt collection.

In parallel with this, our team developed several new Smart Dunning prototypes during the year. These will be evaluated and, if successful, made available to our clients during 2025.

Beyond product development, we intensified our efforts to contribute to the public discourse on ethical debt collection. We took a more active role by hosting a webinar for customers, publishing a debate article in one of Sweden's most prominent newspapers, *Dagens Nyheter*, and writing several blog posts on the topic.

This advocacy was paired with a proactive campaign by our Customer Success Managers to encourage more clients to adopt a modern approach to collections. We are pleased that this resulted in three more customers signing on for our smart dunning program for 2025. These initiatives are a direct reflection of our commitment to promoting fair and ethical business practices.





Anti-Corruption and Ethical Business Practices

At Billogram, our approach to business is rooted in our conviction that “it pays off to treat people well” and our vision “to build relations with every transaction.” This foundation demands that we operate with honesty and integrity in all interactions with customers, suppliers, and other stakeholders. We adhere strictly to our Code of Conduct and all applicable laws, and we extend these high ethical standards to our partners, engaging only with companies that operate ethically and conducting all supplier selections with fairness and transparency.

Protection of Information and Assets

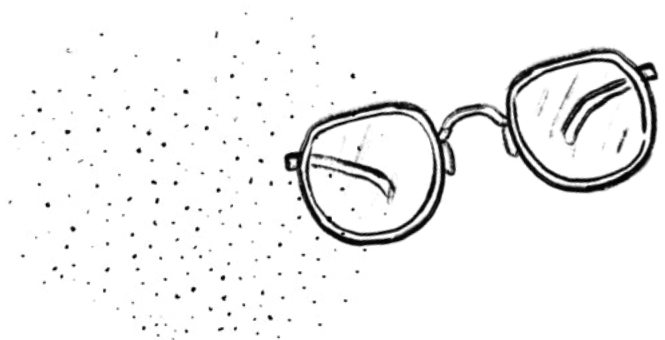
We are committed to the ethical and responsible protection of our sensitive information, intellectual property, and physical assets, along with the data entrusted to us by our business partners and third parties. We align our information security management with the ISO 27001 standard to guard against cyber threats and legal breaches, while our handling of personal data is strictly governed by GDPR, ensuring lawful processing, transparency, and user control.

Furthermore, a major focus during the second half of 2024 was dedicated to implementing the necessary measures to ensure our full compliance with the EU's Digital Operational Resilience Act (DORA) ahead of its effective date in January 2025. This proactive work ensures we meet the highest standards for technological and operational resilience in the financial sector.

Regulation and Compliance as a Payment Service Provider

As a Payment Service Provider regulated by the Swedish Financial Supervisory Authority, our adherence to key legislation—such as the Payment Service Act (PSD2), Anti-Money Laundering/Counter Terrorism Financing (AML/CTF) regulations, DORA, and GDPR—is a fundamental and non-negotiable aspect of our operations.

We manage our compliance proactively through diligent KYC (Know Your Customer) processes and transaction monitoring. To support and enhance these efforts, we have recently expanded our Compliance team with two new specialists. Furthermore, as part of our successful implementation of DORA, we have significantly improved our vendor management process and reinforced our outsourcing policy to meet these new standards of operational resilience.



Initiatives to Prevent Corruption and Bribery

We enforce a zero-tolerance policy against all forms of bribery and corruption. Our commitment is operationalized through a multifaceted approach:

- **Culture and Training:** We foster an ethical culture rooted in our core values and, in 2024, implemented mandatory anti-corruption and bribery training for all employees.
- **Supplier & Vendor Management:** Throughout 2024, we enhanced our vendor management and outsourcing processes, improving our diligence and oversight of all third-party engagements.
- **Transaction Oversight:** Our robust internal controls include the mandatory four-eyes principle on all transactions and a strict signature policy that limits authorization powers.
- **Accurate Books and Records:** We maintain meticulously accurate and truthful transaction records to ensure legal compliance and safeguard against fraud.
- **Conflict of Interest:** Our employees are required to act with objectivity and transparently manage any potential conflicts of interest to ensure all decisions are based on impartial criteria.
- **Risk Management:** We apply a risk-based approach, and during 2024, we conducted assessments of corruption-related risks across our operations.
- **Policies and Reporting:** Our Travel & Expense Policy explicitly includes our zero-tolerance stance. Our comprehensive Whistleblowing Policy, which also covers corruption, was further professionalized during 2024 to enhance the secure and confidential handling of any reports.

Looking ahead to 2025, our focus is on further strengthening our ethical and compliance framework. Key initiatives include enhancing our internal anti-corruption training program and continuing to develop our hiring managers' skills in unbiased, competency-based recruitment. We will also conduct a planned assessment of our conflict of interest prevention measures in collaboration with our risk function. Furthermore, we are implementing more robust routines and processes for documenting and approving external assignments undertaken by our employees.

Whistleblower Function

1

compliance report was reported to our Whistleblower Committee in 2024.

In 2024, one report was submitted through our whistleblowing channel. The report pertained to an allegation of harassment and was directly received for review by our CEO, Chief Legal Officer, and Chief HR Officer, in accordance with our established policy. The report lacked sufficient detail, and the whistleblower chose not to share further information when prompted. As a result, we were not able to act on the report through the formal whistleblowing process.

Had this report been assessed by an external receiver, which we currently do not use, it likely would not have been escalated due to insufficient content and clarity. However, independently of the whistleblowing process, we were able to identify the likely situation referred to and followed up by providing relevant feedback to the individual involved. No further action was deemed necessary.

To help prevent similar concerns from arising or going unaddressed, we continue to foster a culture of openness and trust, where feedback is encouraged and concerns can be raised early through multiple channels. We also maintain clear internal processes to ensure all reports are handled confidentially and responsibly.

Code of Conduct

For detailed information on our ethical standards, please download our Code of Conduct at

billogram.com

