



Brimborg ehf.
Sustainability Statement

2021

Brimborg ehf.
Bíldshöfði 6, 110 Reykjavík
Reg. 7012770239

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Sustainability Statement

Brimborg's 2021 sustainability statement reflects the ESG guidelines issued by Nasdaq Iceland and the Nordic countries in 2019. These guidelines are based on recommendations made in 2015 by the United Nations, the Sustainable Stock Exchange Initiative, and the World Federation of Exchange. Reference is also made to the GRI Standard (Global Reporting Initiative, GRI100-400) and its Reporting Principles (P1-10) of the United Nations Global Compact (UNGC).

Klappir has assisted with the sustainability statement. The statement is based on information which the Klappir sustainability platform has gathered throughout the year.

The sustainability statement contains key information on environmental, social, and governance aspects in Brimborg's operations. Klappir planned and conducted the work in accordance with the principles of the Greenhouse Gas Protocol standards (Relevance, Accuracy, Completeness, Consistency, Transparency).

Klappir has reviewed and assessed Brimborg's data with accuracy and the best available information at this time, excluding the social and governance data. Klappir is not responsible for any investment decisions based on the information presented in this statement.

February 24th 2022, Reykjavík.



Jón Ágúst Þorsteinsson Ph.D.
CEO, Klappir

Organizational and Operational Boundaries

About the company

Brimborg is an importer and dealer for cars and LCV's, a car rental operator and importer and dealer for heavy trucks, construction machines, marine engines and related equipment in Iceland with operations in Reykjavík, Hafnarfjörður, Reykjanesbær and Akureyri. Brimborg represents Ford, Volvo Cars, Polestar, Mazda, Citroën, Peugeot and Opel as well as Volvo trucks, Renault trucks, Volvo bus, Volvo Construction equipment, Volvo Penta marine engines, Dieci telehandlers, Hammar sideloaders, Reisch trailers, Hiab loader cranes as well as other truck and machine related equipment. Brimborg offers new and used light and heavy vehicles, machines and runs service and parts operations for all its brands. Brimborg's Saga Car Rental is the franchisee for Dollar Rent A Car and Thrifty Car Rental offering short term car rental for tourists and locals and van rental for B2C and B2B as well as long term car rental for new and used vehicles. Brimborg is the importer and retailer for Nokian tyres in Iceland and operates MAX1 Bílavaktin tyre and quick fit car service and Vélaland non-authorized workshops.

Organizational Boundaries

Brimborg's operational boundaries include Brimborg ehf. and subsidiaries. Brimborg ehf. markets its products and services under the brands Brimborg, Veltir, MAX1, Vélaland, its Saga Car Rental operations and is the licensee of Dollar Rent a Car in Iceland and Thrifty Car Rental in Iceland. Brimborg's locations are the following:

Bíldshöfði 4-6, 110 Reykjavík, Bíldshöfði 8, 110 Reykjavík, Breiðhöfði 1, 110 Reykjavík, Bíldshöfði 5a, 110 Reykjavík, Jafnasel 6, 109 Reykjavík, Hádegismóar 8, 110 Reykjavík, Dalshraun 5, 220 Hafnarfjörður, Tryggvabraut 5, 600 Akureyri, Flugvellir 4-6, 8 og 20, 230 Reykjanesbær.

Scope 1

Under Scope 1 falls fuel usage for vehicles that's owned or operated under Brimborg ehf. and subsidiaries. Emissions in scope 1 also include fuel usage that is put on vehicles and machinery before it is sold, as it is not possible to separate that fuel usage from Brimborg's ehf. and subsidiaries' own fuel usage.

Scope 2

Operational boundaries in Scope 2 include hot water and electricity usage from every operational unit of Brimborg ehf. and subsidiaries across the country.

Scope 3

3.3. Fuel- and energy activities

Emissions regarding raw material processing, production and transportation of fuel that is used for Brimborg's operations and that is filled on cars and machinery before sale.

Emissions regarding primary processing and transmission and distribution losses of electricity that are used within the operation.

3.4. Upstream transportation and distribution

Emissions regarding all transport and distribution of imported products within Brimborg's operations and subsidiaries.

3.5. Waste generated in operations

Emissions regarding removal and disposal of all waste that occurs within Brimborg's operations and subsidiaries.

3.6. Business travel

Emissions regarding Brimborg's ehf. and subsidiaries' work-related trips of employees.

3.7. Employee commuting

Emissions regarding employees' transportation to and from work within Brimborg's operations and subsidiaries.

Highlights

Greenhouse Gas Emissions: Brimborg's Total emissions were 1294,8 (tCO₂e) in 2021. Scope 1 and 2 emissions amounted to 436,8 (tCO₂e).

Energy Usage: Brimborg's total energy usage was 10.603.863 kwh in 2021. Energy usage includes electricity, hot water and fuel usage. Thereof, indirect energy usage from hot water and electricity consumption amounted to 9.169.420 kWh.

Main emissions: The largest emission source of Brimborg in the year 2021 was emissions from Upstream transportation and distribution (category 3.4).

Additions: Brimborg accounted for emissions from scope 1, 2 and 3.3, 3.4, 3.5, 3.6 and 3.7 for the first time this year.

Statement

Operational Parameters

Operational Parameters	Unit	2021
Total Revenue	billion ISK	22.91
Total Equity	billion ISK	4.08
Number of full time equivalent employees	FTEs	226.0
Total space for own operation	m ²	19,026.3
Number of sold new and used vehicles and new and used trucks, marine engines and machines	no.	3,699.0

GhG emission intensity	Unit	2021
Emission intensity for sold vehicle and new and used truck, marine engine and machine	kgCO ₂ e/no.	350.0
GhG emissions per megawatt-hour consumed	kgCO ₂ e/MWh	122.11
GhG emissions per full-time equivalent (FTEe) employee	kgCO ₂ e/FTEs	5,729.3
GhG emissions per unit of revenue	kgCO ₂ e/billion	56,527.3
GhG emissions per unit of equity	kgCO ₂ e/billion	317,119
GhG emissions per unit of space (m ²)	kgCO ₂ e/m ²	68.05

Nasdaq: E2|UNGC: P7, P8|GRI: 305-4|SDG: 13|SASB: General Issue / GHG Emissions, Energy Management

Energy intensity	Unit	2021
Energy intensity of sold cars and machinery	kWh/no.	2,866.7
Energy per full-time equivalent (FTEe) employee	kWh/FTEs	46,919.7
Energy per unit of revenue	kWh/billion ISK	462,924
Energy per square meter	kWh/m ²	557.3

Nasdaq: E4|UNGC: P7, P8|GRI: 302-3|SDG: 12|SASB: General Issue / Energy Management

Waste intensity	Unit	2021
Total waste per unit of revenue	kgCO ₂ e/billion	17,386.8
Amount of new and used cars and new and used heavy equipment	kgCO ₂ e/no.	107.7
Total waste per full-time equivalent (FTEe) employee	kg/FTEs	1,762.2

Emissions

Carbon offset	Unit	2021
Total emissions offset	tCO ₂ e	0.0
Emissions offset by afforestation	tCO ₂ e	0.0
Emissions offset by wetland restoration	tCO ₂ e	0.0
Emissions offset by other means	tCO ₂ e	0.0

Greenhouse Gas Emissions	Unit	2021
Scope 1	tCO ₂ e	353.3
Scope 2 (location-based)	tCO ₂ e	83.6
Scope 1 and 2	tCO ₂ e	436.8
Scope 3	tCO ₂ e	858.0
Total operational GhG emissions	tCO ₂ e	1,294.8

Nasdaq: E1|UNGC: P7|GRI: 305-1,305-2,305-3|SASB: General Issue / GHG Emissions|TCFD: Metrics & Targets

Scope 1 - Details	Unit	2021
Total emissions	tCO ₂ e	353.3
Mobile fuel combustion	tCO ₂ e	353.3

Scope 2 - Details	Unit	2021
Total emissions	tCO ₂ e	83.6
Electricity	tCO ₂ e	15.3
Heating	tCO ₂ e	68.2

Scope 3 - Upstream emissions	Unit	2021
<i>Category 3: Fuel- and energy-related activities</i>		
Total emissions	tCO ₂ e	116.7
Upstream emissions of purchased fuel	tCO ₂ e	89.2
Upstream emissions of purchased electricity	tCO ₂ e	0.1
Transmission and distribution (T&D) losses	tCO ₂ e	27.4
<i>Category 4: Upstream transportation and distribution</i>		
Total emissions	tCO ₂ e	584.7
Air transportation	tCO ₂ e	398.1
Marine transportation	tCO ₂ e	186.7
<i>Category 5: Waste generated in operations</i>		
Total emissions	tCO ₂ e	35.9
Transport, disposal and treatment of waste	tCO ₂ e	35.9
<i>Category 6: Business travel</i>		
Total emissions	tCO ₂ e	5.4
Air travel	tCO ₂ e	5.4
<i>Category 7: Employee commute</i>		
Total emissions	tCO ₂ e	115.2
Public transportation	tCO ₂ e	2.0
Automobile travel	tCO ₂ e	113.2

Emission Sources

Energy consumption	Unit	2021
Total energy consumption	kWh	10,603,863
Fossil fuels	kWh	1,434,443
Electricity	kWh	1,458,886
Heating	kWh	7,710,534
Direct energy consumption	kWh	1,434,443
Indirect energy consumption	kWh	9,169,420
Nasdaq: E3 UNGC: P7, P8 GRI: 302-1, 302-2 SDG: 12 SASB: General Issue / Energy Management		

Energy mix	Unit	2021
Total energy consumption	kWh	10,603,863
Fossil fuel	%	13.5%
Renewables	%	86.5%
Nasdaq: E5 GRI: 302-1 SDG: 7 SASB: General Issue / Energy Management		

Fuel consumption	Unit	2021
Total fuel consumption	kg	119,570
Petrol	kg	47,137
Diesel	kg	72,337

Water consumption	Unit	2021
Total water consumption	m ³	158,889
Cold water	m ³	25,949.0
Hot water	m ³	132,940
Nasdaq: E6 GRI: 303-5 SDG: 6 SASB: General Issue / Water & Wastewater Management		

Electricity mix	Unit	2021
Total electricity consumption	kWh	1,458,886
Fossil fuels	%	0.0%
Renewables	%	100.0%
Nuclear	%	0.0%

Upstream transportation and distribution	Unit	2021
Total transportation and distribution	tonne	6,140.0
Air transportation	tonne	130.0
Marine transportation	tonne	6,010.0

Waste treatment	Unit	2021
Total waste generation	kg	398,267
Sorted waste	kg	344,234
Unsorted waste	kg	54,033
Recycled waste	kg	331,590
Disposed waste	kg	66,677
Percentage of waste sorted	%	86.4%
Percentage of waste recycled	%	83.3%

Business travel	Unit	2021
Total distance travelled	km	62,131.0
Air travel	km	62,131.0

Employee commuting	Unit	2021
Total distance travelled	km	774,611
Bus transportation	km	22,176
Car travel	km	716,978
On foot / Bicycle	km	34,917

Paper management	Unit	2021
Total amount of printed papers	no.	60,000.0
Total weight of printed papers	kg	299

Environmental management

Environmental management	Unit	2021
Does your company follow a formal Environmental Policy? [1]	yes/no	Yes
Does your company follow specific waste, water, energy, and/or recycling policies?	yes/no	Yes
Does your company use a recognized energy management system?	yes/no	No
Nasdaq: E7 GRI: 103-2 SASB: General Issue / Waste & Hazardous Materials Management		

Climate oversight	Unit	2021
Does your Senior Management Team oversee and/or manage climate-related risks?	yes/no	No
Does your Board of Directors oversee and/or manage climate-related risk?	yes/no	No
Nasdaq: E8, E9 GRI: 102-19, 102-20, 102-29, 102-30, 102-31 SASB: General Issue / Business Model Resilience, Systematic Risk Management TCFD: Governance (Disclosure A/B)		

Climate risk mitigation	Unit	2021
Total annual investment in climate-related infrastructure, resilience, and product development	billion ISK	0.52
Nasdaq: E10 UNGC: P9 SASB: General Issue / Physical Impacts of Climate Change, Business Model Resilience TCFD: Strategy (Disclosure A)		

Social

CEO Pay Ratio	Unit	2021
CEO Salary & Bonus (X) to median FTE Salary [2]	X:1	7.44
Does your company report this metric in regulatory filings?	yes/no	No
S1 UNGC: P6 GRI 102-38		

Gender Pay Ratio	Unit	2021
Median total compensation for men (X) to median total compensation for women	X:1	0.98
Outcome of equal pay certification	%	3.00%
S2 UNGC: P6 GRI: 405-2 SASB: General Issue / Employee Engagement, Diversity & Inclusion		

Employee Turnover	Unit	2021
<i>Full-time Employees</i>		
Year-over-year change for full-time employees	%	12.9%
Dismissal	%	2.5%
Retirement	%	0.0%
Job transition	%	10.1%
Death	%	0.4%
<i>Part-time Employees</i>		
Year-over-year change for part-time employees	%	62.0%
Dismissal	%	0.0%
Retirement	%	55.2%
Job transition	%	6.9%
Death	%	0.0%
<i>Gender</i>		
Men	%	28.9%
Women	%	12.8%
<i>Age</i>		
<20	%	81.1%
20-29	%	42.9%
30-39	%	11.7%
40-49	%	20.8%
50-59	%	15.2%
60-69	%	4.2%
70+	%	0.0%
S3 UNGC: P6 GRI: 401-1b SDG: 12 SASB: General Issue / Labor Practices		

Gender Diversity	Unit	2021
<i>Enterprise Headcount</i>		
Percentage of women in enterprise	%	13.0%
Women	no.	29
Men	no.	218
<i>Entry- and Mid-level Positions</i>		
Percentage of women in entry- and mid-level position	%	11.0%
Women	no.	22
Men	no.	174
<i>Senior- and Executive-level Positions</i>		
Percentage of women in senior- and executive-level positions	%	14.0%
Women	no.	7
Men	no.	44

S4|UNGC: P6|GRI: 102-8, 405-1|SASB: General Issue / Employee Engagement, Diversity & Inclusion

Temporary Worker Ratio	Unit	2021
Full-time positions	no.	28.0
Total enterprise headcount held by part-time employees	%	9.0%
Total enterprise headcount held by contractors and/or consultants	%	0.0%

S5|GRI: 102-8|UNGC: P6

Non-Discrimination	Unit	2021
Does your company follow a sexual harassment and/or non-discriminatory policy? [3]	yes/no	Yes

S6|UNGC: P6|GRI: 103-2 (see also: GRI 406: Non-Discrimination 2016)|SASB: General Issue / Employee Engagement, Diversity & Inclusion

Injury Rate	Unit	2021
Total number of injuries and fatalities, relative to the total workforce	%	1.2%

S7|GRI: 403-9|SDG: 3|SASB: General Issue / Employee Health & Safety

Global Health & Safety	Unit	2021
Does your Company publish and follow an occupational health and/or global health & safety policy [4]	yes/no	Yes
Total absence from work (X) to total working hours of all employees	X:1	0.035
Absence from work due to long-term illness (X) to total working hours of all employees [5]	X:1	0.004
Absence from work due to short-term illness (X) to total working hours of all employees	X:1	0.031

S8|GRI: 103-2 (See also: GRI 403: Occupational Health & Safety 2018)|SDG: 3|SASB: General Issue / Employee Health & Safety

Child & Forced Labor	Unit	2021
Does your company follow a child labor policy?	yes/no	No
Does your company follow a forced labor policy?	yes/no	No
If yes, do your child and/or forced labor policy cover suppliers and vendors?	yes/no	-

S9|GRI: 103-2 (See also: GRI 408: Child Labor 2016, GRI 409: Forced or Compulsory Labor, and GRI 414: Supplier Social Assessment 2016)|UNGC: P4, P5|SDG: 8|SASB: General Issue / Labor Practices

Human Rights	Unit	2021
Does your company publish and follow a human rights policy? [6]	yes/no	Yes
If yes, does your human rights policy cover suppliers and vendors?	yes/no	No
S10 GRI: 103-2 (See also: GRI 412: Human Rights Assessment 2016 & GRI 414: Supplier Social Assessment 2016) UNGC: P1, P2 SDG: 4, 10, 16 SASB: General Issue / Human Rights & Community Relations		

Governance

Board Diversity	Unit	2021
Total board seats occupied by women (as compared to men)	%	40.0%
Committee chairs occupied by women (as compared to men)	%	77.0%
G1 GRI 405-1 SDG: 10 SASB: General Issue / Employee Engagement, Diversity & Inclusion (See also: SASB Industry Standards)		

Board Independence	Unit	2021
Does the company prohibit CEO from serving as board chair?	yes/no	No
Total board seats occupied by independents	%	20%
G2 GRI: 102-23, 102-22		

Incentivized Pay	Unit	2021
Are executives formally incentivized to perform on sustainability	yes/no	No
G3 GRI: 102-35		

Collective Bargaining	Unit	2021
Total enterprise headcount covered by collective bargaining agreements (X) to the total employee population	%	98.7%
G4 UNGC: P3 SDG: 8 GRI: 102-41 SASB: General Issue / Labor Practices (See also: SASB Industry Standards)		

Supplier Code of Conduct	Unit	2021
Are your vendors or suppliers required to follow a Code of Conduct	yes/no	No
If yes, what percentage of your suppliers have formally certified their compliance with the code	%	
G5 UNGC: P2, P3, P4, P8 GRI: 102-16, 103-2 (See also: GRI 308: Supplier Environmental Assessment 2016 & GRI 414: Supplier Social Assessment 2016 SDG: 12 SASB General Issue / Supply Chain Management (See also: SASB Industry Standards)		

Ethics & Anti-Corruption	Unit	2021
Does your company follow an Ethics and/or Anti-Corruption policy? [7]	yes/no	Yes
If yes, what percentage of your workforce has formally certified its compliance with the policy?	%	40.5%
G6 UNGC: P10 SDG: 16 GRI: 102-16, 103-2 (See also: GRI 205: Anti-Corruption 2016)		

Data Privacy	Unit	2021
Does your company follow a Data Privacy policy? [8]	yes/no	Yes
Has your company taken steps to comply with GDPR rules?	yes/no	Yes
G7 GRI: 418 Customer Privacy 2016 SASB: General Issue / Customer Privacy, Data Security (See also: SASB Industry Standards)		

ESG Reporting	Unit	2021
Does your organization publish a sustainability report? [9]	yes/no	Yes
Is sustainability data included in your regulatory filings?	yes/no	Yes
G8 UNGC: P8		

Disclosure Practices	Unit	2021
Does your company provide sustainability data to sustainability reporting frameworks? [10]	yes/no	Yes
Does your company focus on specific UN Sustainable Development Goals (SDGs)?	yes/no	No
Does your company set targets and report progress on the UN SDGs?	yes/no	No
G9 UNGC: P8		

External Assurance	Unit	2021
Are your sustainability disclosures assured or validated by a third party?	yes/no	No
G10 UNGC: P8 GRI: 102-56		

Methodology

The calculation methods, constants, and the statement are based on the Greenhouse Gas (GHG) Protocol, which is a standardized methodology used to calculate the environmental footprint of both companies and organizations.

Direct & Indirect GHG Emissions

The GHG Protocol divides emissions into three scopes to effectively set boundaries between direct and indirect emissions:

- Scope 1 accounts for direct GHG emissions from a company's operations. Direct emissions occur from sources that are owned or controlled by the company.
- Scope 2 accounts for indirect GHG emissions relating to electricity consumption, heating, and cooling. Emissions of this type do not occur within organizational boundaries of the company and are therefore considered to be indirect.
- Scope 3 accounts for indirect GHG emissions from Brimborg's value chain.

The GHG emissions are reported in tonnes CO₂ equivalents (tCO₂e). CO₂ equivalents is a quantity that describes, for a given mixture and amount of GHG, the amount of CO₂ that would have the same global warming potential (GWP), i.e. the ability of a gas to trap heat in the atmosphere when measured over the timescale of 100 years. Methane (CH₄) does for example have a global warming potential of about 25 CO₂e and nitrous oxide (N₂O) of around 298 CO₂e. The statement therefore reports all greenhouse gas emissions in tonnes CO₂e.

Definitions

Emission Intensity

Emission intensity figures are based on combined Scope 1, Scope 2, and Scope 3. Emission intensity is calculated by dividing GHG emissions by a selected operational parameter unit, and is reported as tCO₂e per unit (such as tCO₂e per revenue unit). Emission intensity indicators are used to measure and compare the company's emissions relative to its operational scale.

Direct & Indirect Energy Consumption

The total energy consumption measures all energy consumed by the company, including fuels for the company's vehicles (Scope 1) and energy from electricity and hot water (Scope 2). The energy consumption is reported by source in kilowatt-hours (kWh).

Energy Intensity

Energy intensity is calculated by dividing the total energy consumption by a selected operational parameter unit, and is reported as kWh per unit (such as kWh per full-time equivalent employee (FTEe)). Energy intensity indicators are used to measure the efficiency of energy usage and compare the company's energy consumption relative to its operational scale.

Waste Intensity

Waste intensity indicates how much waste (in kilograms) is generated in relation to a selected operational parameter. This metric can help the company estimate whether waste increases or decreases according to the changes in operational parameters.

Scope 2 (location-based)

Scope 2 includes the emissions from electricity and water purchased from the grid.

Purchased Goods and Services

Includes upstream (cradle-to-gate) emissions from the production of products and services purchased or acquired by the reporting company in the reporting year.

Capital Goods

Includes all upstream (cradle-to-gate) emissions from the production of capital goods purchased or acquired in the reporting year.

Fuel- and Energy Related Emissions

Includes emissions related to the production of fuels and energy purchased and consumed by the reporting company in the reporting year that are not included in scope 1 or scope 2.

Upstream Transportation and Distribution

Transportation and distribution of products purchased in the reporting year, between a company. Third party transportation and distribution services purchased by the reporting company in the reporting year, including inbound logistics, outbound logistics and third-party transportation and distribution between a company's own facilities.

Waste Generated in Operations

Emissions from third-party disposal and treatment of waste in the reporting year.

Business Travel

Emissions from the transportation of employees for business related activities in the reporting year.

Employee Commuting

Emissions from the transportation of employees between their homes and their worksites.

Notes

- [1] E7. Brimborg's main goal is to be among the most progressive companies in Iceland in regards to solving environmental issues. Brimborg has operated in accordance with an environmental policy named Visthæf skref (i.e. Ecosteps), where the focus is on practical steps toward a positive environmental impact. Sustainability report with measurable goals to reduce the environmental effect of Brimborg's operations has been implemented for the first time in 2021. Brimborg has signed the Climate Declaration of Festa, the Icelandic Centre for Corporate Social Responsibility, and the City of Reykjavik. Brimborg adheres to laws and regulations on the impact of the company's operations on its environment, emphasizes waste sorting and waste reduction, digital solutions that reduce paper use and printing and data collection and dissemination, and emphasizes the import of the most environmentally friendly types of cars and equipment from time to time from its partners. Brimborg is working towards energy transition in transportation by investing in the development of charging stations for Brimborg's operations and for public use, as well as transitioning to energy-saving light sources.
- [2] S1. Brimborg has received equal pay certification but does not have a goal when it comes to the CEO's pay ratio.
- [3] S6. Human resources: Violence or harassment, whether psychological or physical, is not tolerated and can result in termination of employment. Any employees who are subjected to harassment should consult their immediate supervisor, Human Resource Management, their shop steward or union representative to place the matter in a proper course. Emphasis is put on the wellbeing of employees, that facilities are good, a positive company culture and supportive and that it is an enjoyable feeling to come to work. Brimborg works purposefully towards health promotion of employees, e.g. with lectures, participation in corporate competitions such as Biking to work promoted by ÍSí (The Icelandic sports- and olympic federation), the flu shot and other health related activities. Employees are also encouraged to speak up on any kind of company improvements. (Resource: Equality policy and goals (version 5, chapter 5)).
- [4] Well-being of employees: Emphasis is placed on the well-being of employees and that the available facilities are good, that the corporate culture is positive and motivating and that employees enjoy coming to work. Systematic efforts should be undertaken to promote and protect workers' health, e.g. with lectures, participation in corporate competitions such as Cycling to Work on behalf of ÍSí, flu shots and more activities that relate to health. It is also strongly recommended that employees participate in any improvements in the company's operations.
- [5] Chronic illness: Employees that have been registered sick for a whole month continuously or on average 21,67 days according to Virk's definition (www.virk.is)

[6] S.10 Recruitment and jobs: For new recruits or transfers, an equal gender ratio within the division and in the various jobs within the division shall be strived for, as far as practicable with respect to availability. However, the individual who is considered the most qualified, irrespective of gender, shall always be employed, unless the purpose is to promote equal representation of the genders within that division, in accordance with Article 12 of Act No. 150/2020. (Resource: Equality policy and goals (version 5, chapter 4))

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Human resources: In accordance with its core values regarding respect, integrity and care, and its goals of good human relations, Brimborg takes care to ensure that equal rights are observed in all respects. There is no discrimination among employees with regard to gender, race, nationality, sexual orientation, age, religion, opinions or other personal characteristics. Brimborg operates in a dynamic competitive environment, which places great demands on our employees and calls for continuous changes in our operation; this requires a workplace culture that embraces change. In order to support this culture, an emphasis is placed on possibilities for all employees to develop their careers through work, training and other continuous education.

The company stresses the importance of compliance by all contractors and subcontractors with legislation on employees' rights, whether permanent employees or contracted workers.

Violence or harassment, whether psychological or physical, is not tolerated and can result in termination of employment. Any employees who are subjected to harassment should consult their immediate supervisor, Human Resource Management, their shop steward or union representative to place the matter in a proper course.

The company's remuneration policy regarding the employment terms of management and employees has the objective of attracting and retaining exceptionally qualified employees. The policy states that gender and other personal characteristics which are unrelated to the tasks involved in the work or performance at work shall not have any influence on wages or wage trends. In order to ensure fairness and consistency in wage matters, management has access to central criteria on the company's wage structure at any time and wage trends in the external market.

Participation in committees and working groups: When appointing members to committees and working groups, members shall be selected on their specialist knowledge, and wherever possible, an equal representation of the genders shall be aimed for.

Reconciliation of work and family life: Emphasis is placed on meeting the needs of employees in regards to flexible working hours, to the extent that it is possible, in such a way as to take account of both employees' family circumstances and the needs of the labour market. Consideration shall be made for women during pregnancy, parental care of infants and uncontrollable and acute family circumstances, in accordance with Article 13 of Act No. 150/2020.

Vocational training and retraining All genders shall enjoy the same opportunities for retraining, continuing education and vocational training, in accordance with Article 12 of Act No. 150/2020.

[7] The rate of employees that have confirmed to following ethical rules are total 100/105 employers which it applies to, i.e. 95% have confirmed, or $11/247 = 40,5\%$ of the whole company. Policy against money laundering exists. It is not allowed to accept higher amount than kr. 500.000. If it regards a higher amount, employers should point out the option of transferring the amount. Brimborg and its employees are obligated by law to follow these rules. Employees should report any suspicious act to the one who is responsible for risk assessment at Brimborg (CFO) and report to their managing director. In their absence, the employer should report to the CEO and/or the human resources manager. (Resource: Gæðakerfi HRM-AF-00 leiðbeiningar).

- [8] G7. Brimborg's privacy policy: <https://www.brimborg.is/is/brimborg-bilaumbod/brimborg-bilaumbod/brimborg-privacy-policy>
- [9] G8. appear in Brimborg's annual report for the year of 2021.
- [10] G9. Will appear in Brimborg's annual report for the year of 2021.