



ESG LINK Mobility

LINK Mobility Group Holding ASA



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Sustainability

This page provides an overview of LINK Mobility's approach is to integrating Sustainability through Environmental, Social, and Governance factors (ESG) into its daily operations.

Link Mobility is committed to promoting sustainable value creation, protection of the environment, respect for human rights and decent working conditions, by building on and improving the group's governance and behaviour, and through offering a state-of-the-art CPaaS solution throughout its footprint, allowing companies to communicate with their customers, employees, and other individuals by use of sustainable technology.

Link Mobility Sustainability management is based on the UN sustainable development goals (SDG), the Ten Principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises. LINK's policies reflect the company's commitment to integrate environmental, social and governance (ESG) factors into its daily operations and as a part of its strategic processes.

International Guidelines

International guidelines are defined to guide companies. The following three are of specific interest to LINK's approach to ESG, and are part of the basis for policies and processes.

UN Goals for Sustainable development

The UN sustainable development goals (SDG) are seen by LINK as a relevant guide for the CPaaS Industry as for any other industry. LINK have identified the Goals of highest relevance to LINK in its processes, please see table below.



For further insight, see <https://sdgs.un.org/goals>

UOECD Guidelines for Multinational Enterprises

The OECD Guidelines for Multinational Enterprises are recommendations to multinational enterprises, that set out general principles for responsible business conduct, and are therefore of relevance for LINK Mobility with operations in 18 countries.



For further insight, see <https://www.oecd.org/corporate/mne/>

UN Guiding Principles on Business and Human Rights

The Guiding Principles seek to provide an authoritative global standard for preventing and addressing the risk of adverse human rights impacts linked to business activity.

Joining the UN Global Compact

LINK commits to integrating the Ten Principles of the UN Global Compact in its operations by being a signatory to the UN Global Compact.

LINK Mobility joined the UN Global Compact in 2021 as part of an increased focus on sustainability.

LINK's report can be found at:

<https://unglobalcompact.org/what-is-gc/participants/145208-LINK-Mobility-Group-Holding-ASA>



United Nations
Global Compact

Significant ESG factors for LINK

Environmental, Social and Governance (ESG) covers a wide area of risk and opportunities:

Environmental

Risk and opportunities related to:

- Sustainability
 - Developing sustainable technologies
 - Minimising emissions
 - Waste management
 - Energy efficiency
- Climate change

Social

Risk and opportunities related to:

- Corporate Social Responsibility
- Respect for human rights
- Labor/ Health and Safety
- Equality and Diversity
- Data Security and Privacy

Governance

Risk and opportunities related to:

- Organizational Structure
- Board composition
- Corruption
- Competition
- Incentive programs/ Remuneration
- Tax

With the changes in the global understanding of Environmental, Social and Corporate Governance as important factors affecting business across markets and industries, it is crucial for any business to understand the risks and opportunities of relevance to them when making strategy decisions and in their daily operations.

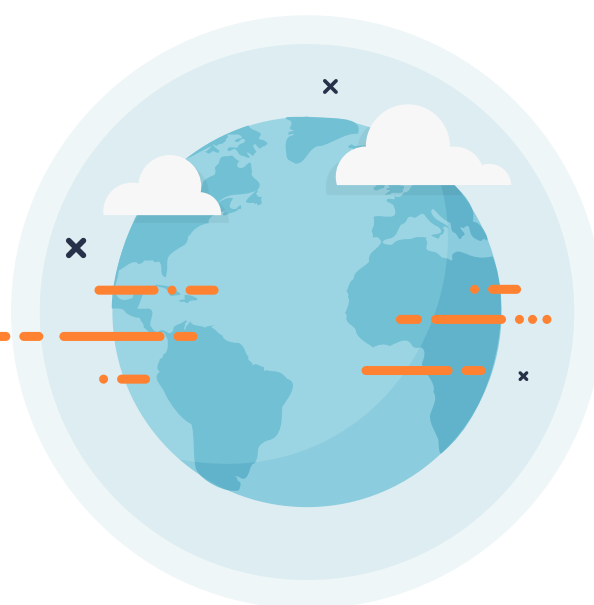
LINK recognizes that the areas affected by Environmental, Social and Corporate Governance factors may vary over time. LINK therefore performs an ESG materiality assessment annually. The topics listed below are the material risks and opportunities following assessment made in 2022.

Factor	References	Actions
Sustainable technologies	UN SDG 9	LINK strives to contribute to the development of more sustainable and innovative technologies
Ethical business practices	UN SDG 16	LINK, as a responsible enterprise in a modern world, strives to implement Ethical business practices operations, as such operations underpin creation of ethical, trust-based corporate culture, where people act not only in line with specific legal requirements, but they also take into consideration moral values in order to do even more than the law requires.
Compliance with laws	OECD Guidelines for Multinational Enterprises	LINK commits to acting in compliance with applicable laws and regulations.
Respect for human rights	Ten Principles of the UN Global Compact	LINK conducts its business in compliance with the Ten Principles of the UN Global Compact.
Labour, health and safety	UN SDG 8	LINK seeks to be a preferred employer through ensured standards of promoting decent working conditions for all.
Diversity, inclusion and belonging	UN SDG 5 and 8	LINK has operations in many countries and can contribute to greater diversity, inclusion and belonging among its employees

Factor	References	Actions
Energy Consumption, monitoring, and efficiency	UN SDG 7 and 13	As a significant consumer of data storage, the Mobile Communications industry is a major player when it comes to being able to positively affect global energy consumption, but is also vulnerable to disruptions and failure.
Climate change	UN SDG 13	LINK seeks to take action to combat climate change and its impacts, including mitigating business risks.
Privacy and Security	UN SDG 9 and 16	Ensuring adequate level of privacy and cybersecurity stands at the forefront of the responsible business conduct of any enterprise operating in a digital industry. While mobile communication opens multitude of new possibilities for businesses and individuals, it also poses significant risk of unauthorized access to data, including the personal data.
Employee engagement	UN SDG 5 and 8	LINK strives for high Employee engagement, as it reflects peoples' general job satisfaction and it may be critical to business success

LINK's approach at-a-glance

Our company understands that sustainability continues to evolve and mature. We are committed to maintaining an open dialogue with our customers, shareholders, employees, industry groups, and other relevant parties as we seek to meet their expectations and hold true to our values as a conscientious global player within CPaaS.



“We know that sustainability plays a key role in achieving long-term success as LINK continues as a leading CPaaS company. Our responsibility is both to stakeholders and to the customers our teams actively engage with. By working together, we can create meaningful industry change while driving our bottom line.”

Thomas Berge, Interim CEO at LINK Mobility Group

Environmental factors

As part of a market where sustainability has, and increasingly will continue to have, an effect on the environment and on the individual, and where the business will see challenges related to sustainability, LINK Mobility will continue to strive for lowering its adverse impacts and managing its risk in sustainability related areas.

The Taxonomy provides a uniform standard

In order to fulfill the goals set in the Paris agreement in 2015, the global community must define measures for sustainability and on how to reach the agreed reduction in environmental impact.

The European Union has created a classification system for environmentally sustainable economic activities in the EU Taxonomy Regulation (EU Regulation 2020/852), hereinafter referred to as the “Taxonomy”. The Taxonomy is the first uniform and credible standard that allows economic parties to align with the transition required to reach environmental goals, as it establishes a common understanding of the economic activities that qualify as environmentally sustainable.

Alignment with the standard requires the following:

- Substantially contribute to one of six defined environmental objectives listed below
 - I. Climate change mitigation: a company’s impact on the environment
 - II. Climate change adaptation: the environment’s impact on a company
 - III. Sustainable use and protection of water and marine resources
 - IV. Transition to a circular economy, waste prevention and recycling
 - V. Pollution prevention and control
 - VI. Protection of healthy ecosystems
- Not do significant harm to any other of the six defined objectives, and comply with a set of minimum social and governance safeguards.

The requirement refers to alignment with the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the International Labour Organization's declaration on Fundamental Rights and Principles at Work and the International Bill of Human Rights, ref. section 2 in this policy.

Environmental objective #I & #II: Double Materiality

the environmental objective of highest importance to LINK is Energy consumption. Owing to LINK Mobility's activities, the topic covers both the first two objectives under the Taxonomy, which are thus the most important for LINK's operations.

- LINK's own energy consumption and LINK's offering to the market has the ability to impact the environment, and is therefore of relevance under objective I
- Availability and cost of energy has the ability to impact LINK's operations, and is therefore of relevance under objective II

The situation where a topic can be important both for its implications for a company's financial value, and for the company's impact on the world at large is also referred to as double materiality.

For insight into LINK Mobility's Energy Consumption, please see GHG report.

Developing sustainable technologies

The mobile communications industry is exposed to rapid technological changes that may be accelerated by increased focus on sustainability. LINK strives to contribute to the development of more sustainable technologies, which will be positive for the environment and give the company a competitive advantage. LINK develops software for digital messaging solutions which enable smartphone notifications and marketing services. Notifications facilitate for online distribution, making it easy for customers to track orders and delivery times. Digital notifications also lessen the need for paper-based mail systems in relation to appointments and confirmations. Digital marketing engages customers seamlessly through to purchase on their smartphones, freeing up time and reducing pollution related to transportation. Moreover, Mobile Invoice is a LINK innovation that allows companies to take their existing paper invoicing flows and move them completely into a mobile only digital environment in order to reduce paper consumption.

Minimizing emissions

LINK contributes to reduced carbon emissions by prioritizing video conferencing to travel. LINK started with group-wide meetings for all employees in 17 countries well before the pandemic. All subsidiaries are further encouraged to consider the environmental impact of its activities and to implement processes to reduce their environmental footprint.

Waste management

The LINK Code of Conduct requires all subsidiaries to ensure that activities to reduce waste are implemented, hereunder recycling.

Energy efficiency

LINK monitors its energy use through collection of data regarding Scope 1 and Scope 2 emissions, published in GHG report on [Sustainability - LINK Mobility International](#).

Furthermore, LINK can influence energy consumption through choice of server sites and hosting providers. By only working with established suppliers and taking into account energy efficiencies, LINK contributes to reduced consumption. LINK has been implementing the enhanced due diligence processes related to procurement since 2021. The company operates in several countries and continuously assesses opportunities to optimize the use of or merger of server sites to further minimize energy consumption. Collection of data regarding Scope 3 will be available in the future.

Climate change

LINK's suppliers might be affected by issues resulting from climate change, hereunder flooding and loss of power. Risks are mitigated through server site redundancies and working with established hosting providers that can document backup and continuity routines.

Social factors

The Material Topics identified 2022 include Social Factors. These will be described below.

For insight into LINK's Management of the Norwegian Transparency Act specifically, please refer to the Transparency Act Report on [Sustainability - LINK Mobility International](#).

Employee Engagement

LINK Mobility collects input from all employees twice per year through a survey discussing multiple areas related to employee engagement.

Respect for human rights

Respect for human rights is vital for upholding the fundamental fabric between all human beings. The LINK Code of Conduct ensures that all managers and employees commit to operate consistent with the UN Guiding Principles on Business and Human Rights and the Ten Principles of the UN Global Compact. LINK complies with all applicable laws and respect internationally recognized human rights wherever it operates. In 2021 LINK joined the UN Global Compact as part of its increased focus on sustainability.

Decent working conditions

LINK, including all subsidiaries, respects the right of its employees to establish or join trade unions and representative organizations of their own choosing. LINK observes and ensures that standards of employment and industrial relations are aligned with comparable employers. LINK takes adequate steps to ensure occupational health and safety in its operations.

An overview of LINK's processes in place to ensure fundamental human rights and decent working conditions in alignment with the Norwegian transparency Act is available in LINK's Transparency Act Report, available here: <https://linkmobility.com/investors/transparency-act-report>.

Diversity, inclusion and belonging

LINK aims for its workforce to be truly representative of all sections of society and for each employee to feel respected, valued and able to perform at their best. It is LINK's purpose to:

Provide equality, fairness and respect for all employees.

Not unlawfully discriminate because of characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation.

Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, selection for employment, promotion, training or other developmental opportunities.

LINK is committed to encourage equality, diversity and inclusion in the workplace and believes it to facilitate better business results. LINK considers focus on equality and diversity an important element in attracting, recruiting and retaining skilled employees. As an international company located in several geographies with extensive use of online work methods, LINK has a country agnostic advantage in its talent search.

Data security and privacy

Proliferation of cyber-attacks and other issues related to breaches of information privacy are key risk factors and an important motivation for LINK's heightened focus on security.

Personal Data Protection

LINK operates in accordance with GDPR regulations. Our platforms are under constant care of a Data Protection Officer, who takes an active part in consulting our projects in terms of GDPR compliance. Our portfolio is built and designed with privacy in mind while constantly undergoing improvements. To satisfy the dynamic nature of Data Protection, LINK applies external penetration testing of platforms to ensure maximum level of protection.

Information Security

LINK's position is to always ensure compliance with applicable legislation and do what is technically and financially possible to ensure the security of the data processing. Information security is paramount at all levels of the organization. Our objective for information security is that LINK performs all necessary activities:

- Availability: Availability of all services with a high percentage of up-time and a minimized risk of down-time
- Integrity: Reliable and correct function of the services and minimized risk of incorrect data usage e.g., due to human or systemic errors or due to external incidents
- Confidentiality: Confidential processing and transmission or storing of data, to which solely authorized users have access

Infrastructure

LINK operates in tier-3 certified data centers that feature redundant connectivity, restricted physical access, video surveillance, fire protection and 24/7 NOC monitoring. All nodes are connected via high-speed MPLS networks to satisfy high availability scalable solutions.

LINK's processes for managing information security and data protection are fully described in the LINK Information Security Policy and the LINK Personal Data Protection Policy.

Governance

Organizational structure

LINK is organized as a Norwegian holding company with several subsidiaries in various European countries and the U.S. The holding company, LINK Mobility Group Holding ASA, is listed on the Oslo Stock Exchange.

- LINK Mobility Group Holding ASA – Norway
 - LINK Mobility Group AS – Norway
 - LINK Mobility – European subsidiaries
 - LINK Mobility USA – Norway
 - LINK Mobility – U.S. subsidiary

Board composition

The composition of the Board must ensure that it can respond to the common interests of all shareholders and meet the needs of the company. The Board of Directors of LINK has adopted the LINK Corporate Governance Policy to reflect the company's commitment to good corporate governance. Through good governance of the business, the company intends to create profitability and increased shareholder value. For specifics on the Board and its governance work, please refer to the "Report from the Board of Directors" section in the annual report.

Corruption

Corruption undermines any legitimate business operation. Bribery and corruption are therefore a risk for any sustainable business. LINK has been implementing the enhanced due diligence processes related to procurement since 2021. LINK's approach to corruption is fully described in the LINK Anti-Bribery and Anti-Corruption Policy.

Competition

LINK complies with applicable antitrust laws and managers are required to take action to avoid even the appearance of any wrongdoing. All LINK employees must demonstrate their awareness of antitrust laws when engaging with competitors, customers, resellers, partners, distributors or suppliers and seek further guidance from the LINK's Legal Function when in doubt. LINK's approach to competition is fully described in the LINK Anti-Trust Policy.

Incentive programs and remuneration

LINK has a Remuneration Committee that prepares guidelines for incentive programs and remuneration. LINK's Nomination Committee proposes remuneration for Board members. For further details, please refer to the "Report from the Board of Directors" section in the annual report.

Tax

LINK consists of more than 30 entities in 18 countries (as of Jan. 2023), where each entity has its tax residence in the country where it is located. The parent company, LINK Mobility Group Holding ASA, is registered in Norway and thus has its tax residency there.

Implementation of ESG

To ensure implementation of and compliance with its ESG policies, LINK follows a compliance management system. Since 2020, compliance has been part of LINK's long-term strategy, and the approval of main policies has consequently been lifted to the Board level, and the policies are implemented group-wide.



