

ESG report

Introduction

General disclosures

E1 – Climate change

E5 - Material use and circular economy

S1 - Own personnel

S2 - Employees in the value chain

S4 - Consumers and end users

G1 - Business conduct



Introduction

In this ESG report, we discuss the progress of our ESG efforts in line with the material topics that emerged from the DMA assessment. Broadly speaking, the description of the policy and the targets for the individual topics follow the structure of the European Sustainability Reporting Standards (ESRS).

Following a set of general explanatory notes for each ESRS topic, we provide an overview of the material subtopics and material sub-subtopics, the results for 2024, the campaign plans for 2025 and the targets. A number of the results and campaign plans are described in the management report, under the relevant strategic pillars. Certain aspects are illuminated in this ESG section or are reflected in the table on the relevant material (sub)topics. The action campaigns and targets for 2025 tie in with the ESRS reporting requirements.

The ESG report and its subcomponents are not part of the annual report audited by the independent accountant.



Message from the QHSE Director

A safe, healthy and sustainable future



As one of the largest technical service providers in the Netherlands, Unica encourages an active contribution to protecting the environment, limiting climate change and providing a sustainable working and living environment. We undertake these tasks on a daily basis for and with our clients, but also in our own business activities and value chain.

We work intensively towards the further establishment and expansion of our ESG policy and wherever possible strive to report in accordance with international standards. Each year we take the next step in gradually expanding our annual reporting into a form that will eventually comply with the Corporate Sustainable Reporting Directive (CSRD). This reporting encourages the creation of a level playing field in which we remain alert and work hard to exploit our competitive edge in the societal topics in which we make a difference.

We have further structured our ESG efforts and the related reporting activities in 2024. Our objectives were once again carefully assessed and where necessary more precisely formulated. An important step in this process is the calculation of our scope 3 emissions. In the past we completed a baseline measurement in which 2022 is taken as the reference year. This year we will be calculating the results for the years 2023 and 2024, to allow us to include the development of these emissions in the report for financial year 2025.

Also in 2024 we further developed our value creation model, the value chain summary and our stakeholder dialogue. Supported by specialists at KPMG, we also conducted a double materiality assessment (DMA) and the related risk assessment, as well as drawing up a roadmap in the runup to CSRD reporting. In order to arrive at a full report and to evaluate our current activities and identify areas of potential improvement, it is essential that we gain more insight by gathering and analysing data. This process will help us identify where specific measures can deliver the greatest impact, so that we can apply focus and make the most effective possible use of our budget.

In this ESG report, we are reporting the progress of our ESG efforts for the first time according to the material topics that emerged from the DMA assessment. Mapping out our ESG performance and ensuring that all stakeholders are brought on board in our future vision is not always an easy task but we recognise the essential nature of making a sustainable and positive contribution to people, the environment and society. Due to the nature of the services we provide, we find ourselves in an ideal position to join our customers and suppliers in delivering a solid contribution to a safe, healthy and sustainable future. This situation creates for us a clear responsibility that we are happy to accept. For our customers and suppliers a sound ESG policy is becoming increasingly important too; in the awarding of orders and when entering into collaborative ventures, embracing ESG is increasingly often an emphatic requirement. Investing in these topics is gradually becoming a hygiene factor in our sector if we wish to continue with our work.

Looking forward to the new year, we once again plan to take further steps in 2025 to ensure future compliance with the CSRD. In close consultation with customers and suppliers, we will identify those areas in which we can make the greatest impact throughout the chain, and how that impact can be best integrated in our strategy and our business model. Acquiring insight and maintaining focus are crucial to realising our financial and social goals. Our continuing ESG efforts help us to make a positive contribution to society through sustainable value creation.

Arnout Vink

Director QHSE, Security & Risk

Unica Groep

ESG Framework

Pillar	Programmes	CSRD Standard	Material subtopics	Material sub-subtopics
General	ESG governance/programme management	ESRS 2 - General disclosures	N/A	N/A
Climate & Environment	CO2 Prestatieladder (eigen operatie) Scope 3 (waardeketen) SBTi	E1 Climate change	<ul style="list-style-type: none">• Climate mitigation• Climate adaptation• Energy	
	ISO14001 Brancheplan verpakkingen Diverse initiatieven en programma's in ontwikkeling	E5 Resource use and circular economy	<ul style="list-style-type: none">• Material inflow• Material outflow• Waste	
People & Society	'Bewust Veilig' programma Welzijn en werkplek DEI-beleid Opleiding & ontwikkeling Recruitment Informatiebeveiliging	S1 Own workforce	<ul style="list-style-type: none">• Working conditions• Equal treatment and equal opportunities for all• Other work-related rights	<ul style="list-style-type: none">• Health and safety• Stable work/job security• Diversity and inclusion• Training and development• Social return*• Privacy for employees*
	Beleid Duurzame Inkoop	S2 Workers in the value chain	<ul style="list-style-type: none">• Working conditions	<ul style="list-style-type: none">• Health and safety of employees in the chain
	Informatiebeveiliging	S4 Consumers and end-users	<ul style="list-style-type: none">• Information-related impact• Personal safety	<ul style="list-style-type: none">• Privacy of customers/end users*• Health and safety of end users
Ethics & Integrity	'Spreek je uit!' programma Informatiebeveiliging	G1 Business conduct	<ul style="list-style-type: none">• Company culture• Corruption & bribery	<ul style="list-style-type: none">• Incidents• Prevention and investigation• Data protection*

* Material topics not identified in the DMA but hallmarked as specifically material for Unica

General disclosures

Subject	Results 2024	Actions 2025	Targets
ESRS E - EU Taxonomy	<ul style="list-style-type: none">• Partner selected	<ul style="list-style-type: none">• EU Taxonomy assessment	<ul style="list-style-type: none">• EU Taxonomy ready• Implementation
ESRS 2 - General disclosures	<ul style="list-style-type: none">• ESG Report Light 2023 published• Double materiality assessment completed• CSRD Gap Assessment & roadmap ready	<ul style="list-style-type: none">• ESG Report 2024 according to CSRD standards• Link between ESG-strategy and organisation strategy• Value chain model developed• Value creation model developed• Implementation of CSRD Roadmap (parts A and B)	<ul style="list-style-type: none">• CSRD Compliance
CSRD Readiness	<ul style="list-style-type: none">• Target ESG governance model identified• Internal communication plan for climate developed• Partner selected• Timeline set	<ul style="list-style-type: none">• Structuring of ESG governance, roles and responsibilities• Training programme MT and ESG roles/positions• Integration sustainability performance in remuneration policy• Rollout of internal communication plan on climate• Development of CSRD Accounting Manual• CSRD Assurance Readiness (Dry run)• Structuring ESG reporting process	
ESG - Ratings & Benchmarks	<ul style="list-style-type: none">• EcoVadis Bronze award	<ul style="list-style-type: none">• Implement improvement actions in specific policy domains	<ul style="list-style-type: none">• EcoVadis Silver award

Governance

Management and supervisory bodies

The Board of Directors determines the policy and (sustainability) structure at Unica. The Supervisory Board supervises the implementation of policy and strategy, and advises the Board of Directors on strategic choices. The Executive Committee (ExCo), which includes the directors of the nine business clusters, the business services and members of the Board of Directors, is responsible for the daily management of the group of companies. The Board of Directors also consults regularly with the Joint Works Council. For detailed information please read the [chapter Corporate Governance](#).

The Board of Directors is specifically responsible for implementing the policy and strategy on long-term sustainable value creation for the business and its activities, taking into account the interests of the relevant stakeholders. The Board is also responsible for assessment of and changes to sustainability aspects of the strategy and the business model of our company.

In 2024, the impacts, risks and opportunities in respect of ESG were identified in the form of an extended double materiality assessment. The way in which this DMA assessment was organised is described below.

The Board of Directors consists of three members, one woman and two men. Together they have considerable knowledge of and expertise in the field of sustainability issues and experience relevant to the services provided by our company. As from April 2025, the Supervisory Board consists of 5 members, one woman and four men. This corporate body also has a thorough knowledge and understanding of sustainability issues.

Each year, supervised by an external organisation, the Supervisory Board holds a self-evaluation which includes an assessment of whether the skills and expertise necessary for correctly supervising the business operations of the company, including sustainability aspects, are sufficiently well represented by the current composition. The evaluation for 2024 revealed that given the growth of the business, it was desirable to expand the membership of the Board, a recommendation that was put into practice in the spring of 2025.

The Executive Committee at Unica can also call upon the support of a number of advisory bodies in relation to policy choices, including the Sustainability Board for specific sustainability issues, the diversity platform Unique in matters of diversity and inclusion and Young Unica for a contribution specific to the point of view of new generations.

Due diligence

With a thorough assessment of our double materiality in 2024, we laid the foundations for integrating due diligence in governance, strategy and the business model. We involved our key stakeholders in this assessment and together identified and assessed the material impacts, risks and opportunities in our value chain. The identification, prevention, mitigation and reporting of current and potential impacts is in line with our business operations, and backed up by our integrated control and risk system. This approach forms the starting point for further due diligence and provides the basis for full compliance with the requirements of the European sustainability standards to which our company is subject.

Risk management process

The well-structured risk management process at Unica is designed to ensure that risks are managed in a transparent and controlled manner. Sustainability issues have been entirely integrated in our internal control and risk management system and are continuously monitored by the Board of Directors and the Sustainability Board. Any necessary improvements and adjustments are made in line with changes to internal and external circumstances.

Under the supervision of the Supervisory Board, the Board of Directors bears overall responsibility for Unica's risk management and control system.

Double materiality assessment

In 2024, supported by specialists from KPMG, a double materiality assessment (DMA) was conducted, including identification and mapping of the value chain, internal and external validation sessions and the approval of the DMA process and its outcomes.

Double materiality refers to two specific dimensions of materiality, namely impact materiality and financial materiality. Impact materiality describes the impact of Unica on society and its stakeholders (the inside-out perspective). Financial materiality relates to the risks and opportunities of sustainable developments for Unica (outside-in perspective).

Impact materiality

Impact materiality requires the publication of sustainability issues relating to current or potential, positive or negative material impact of a company on people or the environment, in the short, medium and long term. This assessment also encompasses the impact in the upstream and downstream value chain of the company.

For current impacts, materiality is based on the seriousness of the impact while the materiality of potential impacts is based on the seriousness and the probability of the impact.

Seriousness is based on:

- a. scale;
- b. scope;
- c. only for negative impacts: the irremediable character.

Financial materiality

Financial materiality requires publication of sustainability issues which could have (potential) material financial effects on the development of a company such as cashflow, financial position or financial performance, in the short, medium and long term. This assessment is not restricted to issues within the scope of control of the company.

The starting point for the assessment of financial materiality is the identification of risks and opportunities which already influence or could influence the financial development, performance and position of an organisation. In this context, an organisation must take account of:

- a. the existence of dependencies on natural and social resources as sources of financial effects;
- b. the materiality of these dependencies;
- c. their classification as sources of risks or opportunities.

Process steps

In the DMA process, we have completed the following steps.

1. Determination of the scope and targets

The first step in the DMA was aimed at gaining an insight into the organisational context at Unica.

Part of determining the organisational context was the mapping out of the value chain since this provides crucial information for identifying the relevant impact, risks and opportunities that must be taken into account in subsequent steps of the double materiality assessment.

2. Identification of sustainability issues (impact, risks and opportunities)

The second step in the DMA is to draw up a longlist of sustainability issues. This involves desk research and the consultation of various internal and external sources. These sources include internal documents such as the previous materiality assessment at Unica (conducted in 2022), the ESRS description from EFRAG and other global standards. For each of the sustainability issues in the longlist, a source, definition and examples were added, in line with Unica's organisational context. The longlist contains the (sub)topics as appearing in Application Requirement 16 of ESRS 1.

Unica assessed the initial longlist in order to ensure the completeness of the sustainability issues in the list. The assessment was carried out via meetings between the Unica project team and specialists at KPMG. The assessment resulted in a medium list of sustainability issues. The elements that satisfy the materiality threshold at Unica were then placed in the shortlist.

The initial longlist contained around 130 topics and the medium list 64 topics. The definitive shortlist of sustainability issues included 14 topics; certain issues relate to multiple impacts, risks and opportunities (IROs).

3. Preparation for the assessment: determination of definitions, thresholds and identification of stakeholders

In preparing to assess impact, risks and opportunities, the Unica project team:

- 1. laid down the definitions and thresholds to be used during the assessment and consolidation steps; and
- 2. identified relevant stakeholders to be involved in the assessment of the sustainability issues.

4. Assessment of impact materiality and financial materiality

4.1 - Onboarding of stakeholders and information sharing

Before the sustainability issues were assessed, the previously identified stakeholders received a DMA pre-read that provided an introduction to the DMA process.

4.2 - Assessments by stakeholders

The assessment of sustainability issues by internal stakeholders took the form of personal meetings with stakeholders, held at the Unica offices. The stakeholders were first gathered into relevant stakeholder groups for environmental issues, social affairs and governance topics.

4.3 - Consolidation of input

The results of the assessment were consolidated on the basis of the EFRAG guidelines on how to determine the total impact materiality and financial materiality. The (average) score on each topic was calculated. Wherever the (average) score exceeded a predetermined materiality threshold, the issue was identified as being material.

5. Internal validation of the outcomes

The results as consolidated by the project team were presented to and validated with the following stakeholders:

- a. Executive Committee, including Executive Board
- b. Supervisory Board

6. External validation of the outcomes

The results as consolidated by the project team were presented to and validated with the following stakeholders:

- a. Joint Works Council – as representatives of the employees
- b. Triton – as shareholder
- c. ABN AMRO – as agent for the syndicate of banks

None of the discussions with these external stakeholders led to changes to the list of material issues. Topics viewed as both relevant and material by this stakeholder group were assessed by Unica as material.

7. Approval of material topics

The steps taken, including the overview of material topics, were approved by the Executive Board.

8. Documentation of the process

The DMA was documented according to this process memorandum (audit trail). The process memorandum was drawn up by the KPMG project team in consultation with Unica.

Stakeholder dialogue

Unica remains in continuous dialogue with stakeholders on topics such as the environment, social interests and prudent governance. The opinions and input of those stakeholders helps us define our business strategy and ESG strategy. Their opinions are taken into account and wherever possible integrated in our policy.

The insights generated from these dialogues emphasise the broad mutual involvement of our stakeholders in our company.

Stakeholders	What do they expect?	How are they involved?	What topics do we discuss?	What do we do with the outcomes?
Employees	Enjoyable and efficient work, projects with major social impact, development and advancement opportunities in a safe, inclusive and healthy working environment	<ul style="list-style-type: none">• Daily contact with management• Regular department meetings• Internal newsletters and magazines• Live broadcasts on current affairs• Annual employee engagement survey• Range of (general) courses available to all• Representation by Works Council	<ul style="list-style-type: none">• Physical and social safety• Sustainable Employability• Diversity• Training and development• Social relevance• Integrity	<ul style="list-style-type: none">• Safe Unica app for reporting safety incidents and information• Digital newsletters, six-monthly magazine, live broadcasts and podcast series on engineering and technology• Your DAY sustainable employability programme• Studica online learning platform• Unique diversity platform• CSR Performance Ladder• Future picture to clarify vision and impact of Unica• Speak out! policy• Anonymous digital whistleblower reporting system
Customers	High-quality tailor-made technological solutions that satisfy all wishes in the field of comfort, safety, communication, sustainability, healthy buildings and cost reduction, rapid corrective action in the event of disruptions and effective complaint handling.	<ul style="list-style-type: none">• 24x7 breakdown support• Daily contact with expert service technicians• Contract/account manager as central contact point• Regular satisfaction surveys• In-depth interviews in customer arenas• Permanent information via website and social media	<ul style="list-style-type: none">• Fulfilling sustainability ambitions• Circular solutions• Innovation / smart applications• Digital support processes• Integrated services via network of companies• Continuity of service provision	<ul style="list-style-type: none">• Developing sustainable integrated concepts• Permanent investment in retaining and training employees for continuity• Close collaboration with chain partners for optimum result• Investing in innovation and digitalisation for smart concepts• Customer teams for operational implementation (operational excellence)• Complaint handling procedure

Stakeholders	What do they expect?	How are they involved?	What topics do we discuss?	What do we do with the outcomes?
Shareholders	Achieving ROI targets, future vision, compliance with legislation and regulations, attracting sufficient qualified personnel, providing insight into our impact and progress on ESG targets and proactive communication on sustainability efforts and timely information/escalation in the event of abuse and risks.	<ul style="list-style-type: none">• General Meeting of Shareholders• Via reports, providing insight into progress of financial and sustainability objectives• Annual report including ESG report	<ul style="list-style-type: none">• Financial performance• Risks and opportunities• Employee satisfaction and safety• Customer satisfaction• Company strategy and corporate governance• Legislation and regulations• Compliance with and contribution to sustainability requirements• Compliance with ESG reporting requirements	<ul style="list-style-type: none">• Reporting on actions taken and to be taken and subsequent results• Implementation of EGS report as extension of our annual report.
Supervisors	Achieving the company objectives in the field of growth and ROI, honest and fair business conduct with customers and suppliers, creating conditions for an attractive, safe and inclusive working environment, stability in legislation and regulations, timely information/escalation in the event of abuse or risks, involvement in changes to company policy and active contribution to policy targets.	<ul style="list-style-type: none">• Regular consultation between Board of Directors and Supervisory Board• Governance of the organisation via an Executive Committee (ExCo) in which all cluster directors and business services directors are represented.• Requests for approval and advice• Consultation with the Works Council• Measurable targets for both financial and ESG-related parameters	<ul style="list-style-type: none">• Financial performance• Risks and opportunities• Sustainability targets• Employee satisfaction• Employment and working conditions• Customer satisfaction• Integrity and ethical business practice• Materiality assessment• Legislation and regulations• Compliance with and contribution to sustainability requirements• Compliance with ESG reporting requirements	<ul style="list-style-type: none">• Determining and adjusting strategic spearheads• Reporting on actions taken and to be taken and subsequent results• Dialogue on material topics and action plan• Strategic integration of sustainability in vision and strategy• Laying down measurable sustainability targets• Identifying and managing risks• Supervising integrity and compliance with legislation and regulations
Financial institutions	Compliance with legislation and regulations, and proactive communication on financial results and sustainability efforts and solid financial management	<ul style="list-style-type: none">• Via reports, providing insight into progress of financial and sustainability targets• Periodic strategic updates aimed at financial partners• Annual report including ESG report	<ul style="list-style-type: none">• Financial performance• Risks and opportunities• Legislation and regulations• Compliance with and contribution to sustainability requirements• Compliance with ESG reporting requirements	<ul style="list-style-type: none">• Twice a year Bankers meeting in which the developments within Unica are explained• Reporting on actions taken and to be taken and subsequent results• Implementation of ESG report as extension of our annual report.

Stakeholders	What do they expect?	How are they involved?	What topics do we discuss?	What do we do with the outcomes?
Suppliers	A fair playing field, fair prices, compliance with ESG standards and reliable payment behaviour	<ul style="list-style-type: none">• Long-term agreements• Supplier assessments• Code of Sustainable Supply (CoSS)• Sustainable procurement policy• Sector protocols such as Safety in Tendering procedures (ViA)• Training and information meetings• Annual report including ESG report	<ul style="list-style-type: none">• Security of supply• Environmental impact• Working conditions• Human rights• Ethical performance• Legislation and regulations and ESG standards	<ul style="list-style-type: none">• Framework agreements• Partner days• Participation in Sector Plan for Packaging• EcoVadis assessments• Knowledge Base for Sustainable Procurement• Development of risk assessments, self-evaluations and independent audits for CoSS compliance• Development of complaints mechanism• Development of anti-corruption/anti-bribery training for employees
Government	Compliance with legislation and regulations, active contribution to policy targets such as energy transition, circular economy and climate action, participation in government initiatives and pilots for public-private partnership and providing insight into our impact and progress on ESG targets	<ul style="list-style-type: none">• Strategic consultation with policy makers and government bodies• Participation in public-private partnerships and innovation programmes• Delivering active input to consultation rounds for legislation and sustainability strategies• Contributing to sector associations and sectoral working groups	<ul style="list-style-type: none">• Legislation and regulations• Energy transition• Circular economy• Social innovation	<ul style="list-style-type: none">• Issuing policy recommendations based on practical experience or pilot projects• Participating in conferences, seminars, network meetings and (innovation) pilots• Transparent communication on progress and impact (for example in our annual report)
Knowledge institutions	Compliance with certification standards, providing openness on technologies used and sustainability claims and continuous quality improvement from improvement points following inspections and implementing inspection requirements	<ul style="list-style-type: none">• Periodic checks and audits of products and processes• Training and knowledge sharing on changing certification requirements and regulations• Feedback loops for immediate follow-up to findings and improvement points from audits	<ul style="list-style-type: none">• Safety• Quality of products and processes• Harmonisation of sustainability certifications• Process optimisation and digitalisation• Training opportunities for employees	<ul style="list-style-type: none">• Improving internal processes based on QMS and PDCA cycle• Transparency and cooperation in the chain via Governance Code for Safety in Construction (GCVB)• Support for certification programmes to improve documentation and data flows and regular evaluation of cooperation with inspection bodies

E1 – Climate change

Material topic	Results 2024	Actions 2025	Targets
General disclosures, policy and objectives	<ul style="list-style-type: none">• Policy description climate & environment based on current situation	<ul style="list-style-type: none">• General disclosures ESRS 2 ready	
Climate mitigation	<ul style="list-style-type: none">• Scope 3 baseline measurement and SBTi scenario model 2032 completed• Pilot for cluster plans scope 3 drawn up	<ul style="list-style-type: none">• Update CO2 Performance Ladder to handbook 4.0• Re-baselining of scope 1 and 2 to 2022• Drawing up new reduction targets 2028-2030• Drawing up cluster plans scope 3 for all clusters• Scope 3 data improvement• Validation of SBTis	<ul style="list-style-type: none">• 40% CO2 reduction in scope 1, 2 and business travel compared with 2019• 35-40% emission free vehicle fleet by 2025• 100% emission-free vehicle fleet by 2030• Compliance with Science Based Targets scope 1, 2 and 3
Climate adaptation		<ul style="list-style-type: none">• Climate risk assessment and transition plan, measurement data and targets	
Energy	<ul style="list-style-type: none">• Harmonisation of mobility scheme still underway at several companies• All companies affiliated to fleet management software Hubble, with the exception of new acquisitions• Smart meters: still 5 locations in process, still 7 locations in process for reading out solar panels• Energy meter registrations centralised to EnergyPanel with the exception of new acquisitions• EML implemented for 11 locations• From Q3 2024, only EVs for lease cars within the central mobility scheme• Declaration module for work-related kilometres integrated in HR package• Rollout of TravelPerk for central registration of business travel	<ul style="list-style-type: none">• Digitalisation of all energy measurements (electricity, gas, solar, ates)• Integration of new acquisitions on EnergyPanel and Hubble• Drawing up of sustainability plan for work-related kilometres	

Unica is aware of the urgency of climate change and the necessity to reduce our own ecological footprint and that of our customers. We strive to fulfil the challenging ambitions of our customers and wish to maximise our impact on the way to a CO2-neutral society. We have summarised this objective as follows: we envisage and realise a safe, healthy and sustainable future for our customers and for future generations.

With this in mind, we have committed to implementing a climate policy focused on reducing CO2 emissions, improving energy efficiency and promoting circularity. Our primary objective is to reduce our own emissions to zero. We will make this possible by striving for complete electrification of our offices, business locations and vehicle fleet, and purchasing exclusively Dutch green electricity.

All relevant environmental aspects and the possible management measures are embedded in the environmental management system according to the ISO 14001 standard. This enables us to manage, evaluate and improve our environmental impact on a systematic basis.

Our policy is focused intensively on raising awareness among our employees in respect of CO2 emissions, energy efficiency and circularity. We organise information sessions and toolbox meetings and use our Studica platform to enable our employees to participate in presentations on these topics. We also register participation by our employees in these informative training courses.

Much of our growth is achieved through mergers and acquisitions. We still have insufficient insight into the environmental impact of a number of the companies acquired by us. With that in mind, total integration of these companies and inclusion in our environmental management system enjoys our permanent attention.

CO2 emissions and scope 1, 2 and 3

To determine what we want to achieve, it is also important to identify our current status. Taking that as our starting point, we can formulate our targets. For this purpose, we have set 2019 as a reference year. In calculating our emissions, we comply with the Greenhouse Gas Protocol (GHGP). Because greenhouse gases contain not only carbon dioxide (CO2) but for example also propane, we report our emission figures in CO2e (CO2 and equivalents).

The GHGP distinguishes three different emission flows:

- 1. **Scope 1:** Direct emissions from sources owned or controlled by the company such as emissions from company vehicles and heating installations.
- 2. **Scope 2:** Indirect emissions from the generation of purchased electricity, steam, heating and cooling as used by the company.
- 3. **Scope 3:** All other indirect emissions that occur in the value chain of the company, both upstream and downstream. Upstream includes emissions from procured goods and services, capital goods, transport and distribution, production waste, business travel and home-work travel. Downstream relates among others to transport and distribution to customer/client/construction site, processing of procured products, consumption of sold products and end-of-life processing.

Scope 1 & 2

In the inventory of CO2e emissions, the following emission flows have been mapped out.

Scope 1	Scope 2	Business travel
Natural gas consumption	Electricity consumption - gray power	Business transport - declared kilometers
Fleet fuel consumption - diesel	Electricity consumption - GVO's NL solar/wind	Business transport - public transport
Fleet fuel consumption - petrol	Electricity consumption - green electricity	Air travel < 700 km
Fleet fuel consumption - LPG	Electricity consumption - generation of solar panels	Air travel 700-2.500 km
Propane	Electricity consumption - solar panels return	Air travel > 2.500 km
	Electricity consumption - cars	Commuter traffic
	Heat supply - heat label Barendrecht	

Energy consumption

Share renewable (GJ)	2024	2023	2022	2021	2020	2019 (base year)
Non-renewable energy consumption	144,403	134,332	148,723	127,271	114,845	100,556
Renewable energy consumption (NL solar/wind)	34,168	28,436	0	922	0	0

Type of energy carrier (GJ)	2024	2023	2022	2021	2020	2019 (base year)
Natural gas consumption	8,835	9,727	10,347	11,254	8,988	8,525
Fleet fuel consumption - diesel	56,323	51,628	53,718	50,748	54,678	55,820
Fleet fuel consumption - petrol	78,760	72,520	62,023	46,585	36,256	20,843
Fleet fuel consumption - LPG	3	9	69	39	0	0
Propane	0	0	0	3	0	0
Electricity consumption - gray power	0	0	22,122	18,153	14,515	14,944
Electricity consumption - green electricity	32,436	27,142	0	922	0	0
Electricity consumption - cars	10,549	7,243	0	0	0	0
Heat supply - heat label Barendrecht	483	447	445	489	408	425
Total energy consumption (GJ)	178,572	162,768	148,723	128,193	114,845	100,556

The energy assessment has been prepared in accordance with ISO 50001 §4.4.3.

Energy reduction

The following table shows our relative energy consumption compared to the base year 2019. The absolute amount of energy consumption has increased. Energy consumption is rising due to the electrification of our vehicle fleet, our autonomous growth, and the energy consumption of additional buildings due to acquisitions. In the next table, it can be seen that despite this increase, we are well on our way to achieving our emission targets. A relative energy reduction goal of 1.5% per year has been established. This is done by calculating the energy reduction relative to the growth of revenue and the size of our company. The formula we use for this is GJ/revenue.

The absolute progress of our energy consumption is rising, but relative to the revenue, we see energy consumption at 94% compared to the base year. This means we are almost in line with the target of achieving a relative reduction of 7.5% in 2024 compared to the base year.

Progress energy consumption	2024	2023	2022	2021	2020	2019 (base year)
Expected target (1.5%/year)	176%	161%	148%	127%	114%	100%
Achieved turnover (*)	92.5%	94.0%	95.5%	97.0%	98.5%	100.0%
Turnover development	900,935	843,327	756,207	663,155	538,946	483,426
Energy intensity per turnover (GJ/euro)	186%	174%	156%	137%	111%	100%
Energie intensiteit per omzet (GJ/euro)	196	191	197	193	213	208
Relative progress related to turnover	94%	92%	95%	93%	102%	100%
Number of FTE	4,191	3,778	3,555	3,287	2,843	2,590
FTE development	162%	146%	137%	127%	110%	100%
Energy intensity per FTE (GJ/FTE)	42	43	42	39	40	39
Relative progress related to FTE	109%	110%	108%	100%	104%	100%

* The revenue achieved for 2024 has been adjusted for acquisitions.

The demarcation guidelines of the CO2 Performance Ladder are used for the calculation. In addition, the energy consumption of companies that were acquired in the reporting year is not included in the calculations. Due to the significant size of the acquisitions in 2024, the revenue share of the acquired companies has been deducted from the group revenue for 2024.

All energy components are included in the intensity calculation. The calculation includes energy consumption within the own organization.

Emissions

	2024	2023	2022	2021	2020	2019 (base year)
Scope 1 emissions flow type						
Natural gas consumption	596	639	682	670	535	509
Fleet fuel consumption - diesel	5,173	4,742	4,943	4,670	5,032	5,211
Fleet fuel consumption - petrol	6,750	6,215	5,246	3,940	3,067	1,826
Fleet fuel consumption - LPG	0	1	4	2	0	0
Propane	0	0	0	0	0	0
Total scope 1 (tons of CO2e)	12,519	11,597	10,875	9,283	8,633	7,546

	2024	2023	2022	2021	2020	2019 (base year)
Scope 2 emission flow type						
Electricity consumption - gray power	1,076	2,521	2,522	2,453	2,143	2,642
Electricity consumption - GVO's NL solar/wind	-2,647	-3,438	0	0	0	0
Electricity consumption - green electricity	0	0	0	0	0	0
Electricity consumption - generation of solar panels	0	0	0	0	0	0
Electricity consumption - solar panels return	0	0	0	0	0	0
Electricity consumption - cars	1,571	917	692	351	99	52
Heat supply - heat label Barendrecht	43	36	36	39	26	23
Total scope 2 (tons of CO2e)	43	36	3,250	2,843	2,268	2,717
Business travel emission stream type						
Business transport - declared kilometers	485	542	546	422	471	875
Business transport - public transport	5	15	8	1	1	3
Air travel <700 km	2	5	3	1	0	10
Air travel 700-2.500 km	7	10	1	1	0	6
Air travel >2500 km	17	40	0	0	4	0
Total business travel (tons of CO2e)	517	613	557	424	477	893
Total emissions (tons of CO2e)	13,079	12,245	14,682	12,550	11,378	11,156

	2024	2023	2022	2021	2020	2019 (base year)
Type of emission flow commuting						
Commuter traffic	957	807	742	602	560	678
Total commuting (tons of CO2e)	957	807	742	602	560	678

The "organizational boundary" has been drawn up in accordance with the requirements of Greenhouse Gas Protocol – A Corporate Accounting and Reporting Standard:2004, chapter 3, as described in the CO2 Performance Ladder Handbook 3.1, chapter 4. The operational management approach has been applied. The CO2 emission inventory report has been drawn up in accordance with the requirements of ISO 14064-1, §9.3.1. The emission factors are based on www.co2emissiefactoren.nl.

The table below shows our scope 1 and 2 emissions compared to the base year 2019, using the relative reduction targets. The expected progress was that by 2024 we would have 67% of the emissions compared to the base year. In 2024, we will reach 61% of emissions compared to the base year. That is 6% better than expected.

In relation to our FTE, we see emissions of 70% of the emissions compared to the base year. If we take the average of the FTE and revenue reduction, we arrive at 65.5% of the emissions compared to the base year, resulting in a reduction of 34.5%. That is 1.5% better than forecast.

Emission intensity and progress

	2024	2023	2022	2021	2020	2019 (base year)
Absolute progress	113%	110%	132%	112%	102%	100%
Expectation objective (related to turnover and FTE)	67%	70%	85%	90%	95%	100%
Achieved turnover	900,935	843,327	756,207	663,155	538,946	483,426
Emissions per turnover (ton CO2e/euro)	14.517	14.520	19.4	18.9	21.1	23.1
Relative progress related tot turnover	61%	63%	84%	82%	91%	100%
Number of FTE	4,191	3,778	3,555	3,287	2,843	2,590
Emissions per FTE (ton CO2e/FTE)	3.1	3.2	4.1	3.8	4.0	4.3
Relative progress related tot FTE	70%	75%	96%	89%	93%	100%

Scope 1, 2 and business travel are included in the intensity calculation, in accordance with the requirements of the CO2 Performance Ladder level 3.

Vehicle fleet

To arrive at an emission-free vehicle fleet by 2030, from 2024 onwards, only electric passenger car models can be leased. Assuming a period of use of 6 years, this means that all new orders in 2030 will be emission-free. Almost one quarter (24%) of our vehicle fleet was electric in 2024 and with the amended lease scheme, this development will be accelerated over the coming years.

For the category vans, we are currently faced by the limited availability of vehicles with sufficient operating radius. On top of that, the weight of a fully laden van further reduces its operating radius. Given the considerable distances we cover with our vans in the Netherlands, this is a clear bottleneck, but more and more models of delivery vans and other commercial vehicles are coming onto the market, that offer a useful operating radius. We expect this development to continue and that we will be able to maintain our target of an emission-free vehicle fleet by 2030.

Scope 3

Scope 3 emissions are indirect emissions produced by the entire value chain of Unica. We do not directly generate these emissions ourselves, but they are an indirect result of our activities. This includes emissions by suppliers, customers and other stakeholders in our value chain, both upstream and downstream. Although we do not own or manage the sources of these emissions, we are indirectly responsible because our activities and decisions contribute to creating them. Our reduction measures and ambition scenario were assessed according to the standard from the Science Based Target initiative (SBTi). This global joint venture lays down scientifically underpinned targets for reducing CO2 emissions. We laid down our reduction target in a commitment published by SBTi in April 2025.

We carried out a baseline measurement with 2022 as the reference year in order to obtain an initial insight into our scope 3 emissions. This involved analysing procurement expenditure (for example from the database category 'heating') using average data from the industry, supplemented with material and supplier-specific data. This baseline measurement revealed that scope 3 emissions make up 96% of total emissions.

To further refine this data, we conducted an extensive survey in the chain, in 2024. Suppliers were asked about the environmental impact of their products and services, to enable us to better identify the source of the greatest impact within our segments. Scope 3 emissions can be subdivided into different categories. The largest category for Unica is 'Category 11: Use of sold products'. The second largest category is 'Category 1: Purchased goods and services'. Our calculations are mainly based on:

- Average data method (49%)
- Spend-based method (39%)
- Supplier-emission data (8%)

We plan to increase the share of supplier-emission data each year by requesting lifecycle analyses (LCAs) from our suppliers. This will not only enable us to improve the accuracy of our emission calculations but will also help us work more effectively with our suppliers to further reduce emissions.

The impact for 2023 and 2024 will be calculated in 2025. This will enable us to monitor trends and reductions as compared with the baseline year for 2022 and to further improve data quality. We will also continue to develop our scope 3 strategy and work on further steps for improving our CO2 performance.

Energy consumption

Energy is a central element of our climate policy. Optimising energy consumption will contribute to our primary objective of reducing our emissions to zero. Renewable energy plays an important role in this process, but at the same time optimising our energy demand in the use of materials and system design are contributing factors.

We are striving to optimise our energy consumption by:

- Remote management of systems and preventive/remote correction of disruptions. This involves the use of an energy monitoring system. This approach is still being developed.
- We employ Building Information Modelling (BIM) in the design of simulations with a view to optimising the demand for energy in our designs and the efficient use of materials. This also contributes to the optimum charging of transport vehicles and as such has a positive impact on the number of transport movements. Within two clusters we are already working according to this design method. The use of BIM is focused on new-build projects; the next step will be to apply the system to existing buildings.
- Increasing awareness of energy saving among employees and encouraging the use of best practices.

Monitoring and certification

Our processes are laid down in our quality management system. Among others we are ISO 14001 certified. This means that all relevant environmental aspects and the possible management measures are integrated in an environmental management system. This system is audited annually by a competent external authority.

To strengthen the management approach to energy and CO2 reduction within our own business operations, we make use of the CO2 Performance Ladder. This instrument is used by the vast majority of our companies, all of which are certified at level 3. The performance ladder is externally audited each year.

At the start of 2025, Unica was awarded an EcoVadis bronze medal, above all having achieved a higher score for the elements environment and sustainable procurement. Our ambition is to structurally achieve a silver medal score. The awarding of a bronze medal serves as a clear encouragement to further tighten up and improve our policy. During the final months of 2024, a start was made on tackling a number of areas for improvement identified in the EcoVadis assessment. These actions will be implemented in line with policy during the course of 2025.

Unica occasionally works with hazardous substances. All hazardous substances are identified, classified and recorded according to standardised protocols. We ensure that all employees working with hazardous substances are trained in safe use and risk management. We also employ closed systems and safe storage methods to minimise the risks of exposure and leaks. Periodic risk analyses and internal audits are an integral part of our safety and environmental management system.

If environmental incidents do occur, we follow the compulsory reporting procedures. In the framework of working with F-gases, at European level, these procedures are outlined in the BRL 100 scope. All reports within our organisation relate to leaks. These are recorded in the Safe Unica app. We are required to submit these reports to our clients, who in turn are required to report the incidents to the competent authorities. This policy has been communicated to and is known by all our employees involved directly and indirectly with working with F-gases.

E5 - Material use and circular economy

Material topic	Results 2024	Actions 2025	Targets
General disclosures, policy and objectives	<ul style="list-style-type: none">Policy description climate & environment based on current situation (in final stages)	<ul style="list-style-type: none">General disclosures ESRS 2 readyDeveloping plan for reformulation of policy, action plan, KPIs and targetsRegistration of consumption data in own systemsDevelopment of campaign for circular design	<ul style="list-style-type: none">Policy and action plan for material use, circularity and waste
Material	<ul style="list-style-type: none">Unica Marketplace successfully launchedPilot supply of emergency lighting without packagingContracted wholesalers have signed Sector Plan for Packaging62% of framework contract parties have completed LCA baseline measurement	<ul style="list-style-type: none">Internal awareness campaign Unica Marketplace and Knowledge Base for Sustainable ProcurementIncreased cooperation with suppliers who supply without packagingImplement Circo-electra at locations	<ul style="list-style-type: none">20% less plastic and cardboard from wholesalers (compared with 2022)100% recyclable packaging50% framework contract parties to develop LCAs
Waste	<ul style="list-style-type: none">68% of all companies use RenewiDesign for recycling centre company restaurant and head office in HoevelakenPlastic cups phased out	<ul style="list-style-type: none">Onboarding of various Unica companies to Renewi	<ul style="list-style-type: none">In 2025, 50% of office waste separatedIn 2030, 95% of office waste separated

The growing attention for environmental risks and the shortage of raw materials and stricter legislation and regulations underline the importance of sustainable and efficient use and reuse of materials and waste reduction.

Circularity

We strive to preserve the natural environment through the sustainable and efficient use of materials and by minimising our waste production. We are taking the following steps to integrate circularity in our business operations:

- Designing products and processes with a view to reuse, recycling and minimum waste production. The use of Building Information Modelling (BIM) can contribute by designing simulations with a view to optimising the demand for energy in designs and the efficient use of materials.
- Developing a marketplace for surplus materials. These materials are entered in a database and can be acquired by other offices. This will extend the lifecycle of materials. This marketplace was launched in the spring of 2024.
- The Knowledge Base for Sustainable Procurement brings together all products, processes and concepts and the information provided to suppliers on sustainable topics. This platform enables all employees to compile sustainable solutions more easily and to answer questions from customers about sustainable products.
- Baseline measurement Life Cycle Analysis (LCAs) for framework contracted manufacturers. This will give us an insight into the material flows and effects during the entire lifecycle of a product. On that basis, in collaboration with them, we can draw up policy on minimising material flows and negative impacts.

- Cooperating with chain partners in the sector to minimise the use of primary raw materials for packaging and packaging materials.

The overview above shows the progress of the various actions.

Within the sector itself, there are a number of different initiatives for the collection and recycling of products used in technical service provision. We are for example affiliated to the Stichting OPEN foundation, which is responsible on behalf of all manufacturers and importers in the Netherlands for the collection and recycling of end-of-life devices, lights, batteries and rechargeable (bicycle) batteries. All lights and devices disposed of by Unica are a valuable resource for this foundation, for future reuse. We are also participants in Circopomp, a circular chain for Heating, Ventilation and Air Conditioning (HVAC) systems. As part of this initiative, pumps, air and dirt separators, float vents and valves are collected so that the products and raw materials can be given a second life.

Packaging

In 2022, we signed up to the Sector Plan for Packaging, a covenant aimed at reducing the volume of packaging, and making packaging materials more sustainable. Our ambition is to work towards a circular economy in which the use of primary raw materials for packaging and packaging waste are minimised, for example by using packaging crates subject to a deposit payment as opposed to disposable packaging.

Together with other parties from the sector, we are encouraging chain partners to use less packaging material. Because packaging is not separated as a specific waste flow within our company, it is difficult for us to quantify the actual effect. For this reason, we encourage wholesalers to supply their products to us as far as possible without packaging or to accept returned packaging material for reuse.

Waste management

Our goal is a structural reduction in waste production while ensuring that any materials that are disposed of are processed at the highest possible level. We do this by separating waste at office locations and work locations, and working together with an approved waste processor who ensures that the waste is recycled and reused at a high level. We organise an annual compliance check and quarterly audit at our waste processor, to demonstrate that we do dispose of our waste in the appropriate manner.

Based on the insights we have gained into incoming and outgoing material flows, in 2025 we will develop policy objectives, action campaigns and monitoring programmes to reduce and optimise the use of resources, or replacing them with more environmentally friendly alternatives. In collaboration with our waste processor, we will also be taking additional measures over the coming years to further improve our insight into waste flows.

Our aim is to have all businesses in our network work with the same waste processor so that waste flows can be centrally registered. The will also result in an absolute increase in the number of tonnes of waste we register. The rate of reuse of waste material is growing. In 2022, it amounted to 38% of the total while in 2024, 42% of the processed waste could be reused. We will continue in our efforts to integrate new offices and project locations of Unica in order to acquire an even more complete picture of our waste flows.

Material outflow - Waste	2024	2023	2022
In tons	994	824	596
% reuse	42%	41%	38%

The vast majority of waste requiring processing is residual waste. Below, the waste flow is broken down into individual waste types.

Waste type	2024	2023	2022
Residual waste	40%	45%	46%
Construction & demolition	20%	12%	5%
Foil / plastics	1%	1%	1%
Metal	0%	6%	8%
Hazardous waste	2%	2%	2%
Wood	4%	4%	2%
Paper / cardboard	17%	18%	26%
Scrap	6%	6%	3%
Confidential paper	2%	2%	2%
Others incl. organic waste	8%	4%	5%
	100%	100%	100%

S1 - Own personnel

Material topic	Results 2024	Actions 2025	Targets
General disclosures, policy and objectives	<ul style="list-style-type: none">• Policy description based on current situation	<ul style="list-style-type: none">• General disclosures ESRS 2 ready• Analysis policy for own workforce according to UNGP and OECD guidelines	
Working conditions - Health and safety	<ul style="list-style-type: none">• (Management) training Your Day on online learning platform Studica• PMO results shared with management• PMO follow-up for employees with training• Theme-based campaign 'Sleep' (focus area PMO)• Social safety included in engagement survey and PMO• Social safety on agenda at various clusters	<ul style="list-style-type: none">• Reducing absenteeism to < benchmark % sector• Follow-up of PMO in clusters (improvements)• Research into appropriate labour policy	<ul style="list-style-type: none">• Absenteeism ≤ benchmark % sector
Equal treatment and equal opportunities for all - Diversity & inclusion	<ul style="list-style-type: none">• Management of diversity platform Unique introduced• Various activities organised by platform• programme director Leadership and organisation appointed	<ul style="list-style-type: none">• Leadership and organisation programme (including D&I) in place• Accelerated focus on gender targets• Integrate inclusion in policy, including target groups young employees and neurodiversity• Rollout of Unconscious Bias via online learning platform Stucica	<ul style="list-style-type: none">• 20% women in management positions (SER) definition
Equal treatment and equal opportunities for all - Training and development	<ul style="list-style-type: none">• Rollout of new format Young Professional Programme (HBO/MBO)• Start of ninth cohort Traineeship• Online learning platform Studica professionalised with focus on qualification learning	<ul style="list-style-type: none">• Process for measuring and reporting KPIs for training and development in place• Rollout of leadership development programme• Guidelines, process and pathways for career development understandable for all employees• Further development of skills (technical, commercial and digital)• Succession planning in place for embedding internal career	<ul style="list-style-type: none">• eNPS rise as compared with 2024 (16)
Working conditions - Stable employment/job security	<ul style="list-style-type: none">• Follow-up of new collective labour agreement Technical Installation company• Contract policy confirmed (following 1 temporary contract switch to contract for unspecified term, if good performance. Also applies for secondment to permanent contracts following agreed contract hours)	<ul style="list-style-type: none">• Process for measuring and reporting KPIs for collective labour agreement coverage in place• Policy and disclosures for collective labour agreement coverage rate drawn up• Process for measuring and reporting KPIs for job security in place• Mapping out correct balance (flexible, permanent, fixed/non-fixed term) and action plans per cluster based on strategic staff planning.	

Material topic	Results 2024	Actions 2025	Targets
Equal treatment and equal opportunities for all - Social return	<ul style="list-style-type: none">• Reporting on SROI in personnel system• Specialist Inclusive Labour Market appointed to establish SROI counter	<ul style="list-style-type: none">• Policy and action plan for reaching targets linked to organisation objectives ready• Cluster specific targets for SROI adopted	<ul style="list-style-type: none">• More than 2% FTE of all personnel must consist of SROI
Other work-related rights - Employee privacy			
Working conditions - Health and safety - own workforce	<ul style="list-style-type: none">• Training on Working Conditions Act and 10 Safety Rules available via online learning platform Studica• IF index 2.1 - target achieved in 2024 better than benchmark• 4 accidents with Netherlands Labour Authority investigation• Demonstrable learning organisation in respect of safety based on employer surveys Netherlands Labour Authority	<ul style="list-style-type: none">• Registration and reporting of coverage by safety management system• Onboarding acquisitions in safety management system (SCL, VCA)• Development of safety training for 5 prioritised subjects• Additional attention for increased safety awareness among acquired companies	<ul style="list-style-type: none">• Accident frequency index (IF) <5

Our employees are the foundation for the success of Unica. Our personnel policy is focused on creating a safe, inspiring and inclusive working environment in which employees prosper and are able to develop. We attach considerable value to being a good employer and underwrite international guidelines such as the United Nations Guiding Principles on Business and Human Rights and the standards of the International Labour Organisation, in safeguarding an ethical and responsible personnel policy.

We deal with a number of specific developments that relate to us as an attractive employer [in our management report](#). Below we discuss a number of policy principles relating to our own employees, in more detail.

Safety

Preventing and identifying safety risks on the work floor is a policy spearhead at Unica. We operate according to the motto: we work safely or we do not work at all! This reflects our efforts in ensuring a safe and healthy working environment in which we strive to prevent accidents and maintain a safe working environment for everyone involved in the work we carry out; employees, temporary employees, self-employed contractors, subcontractors and chain partners and the end users of the technical solutions we supply. By integrating preventive measures and active risk governance/ management in our everyday business operations, we create a working culture in which safety is recognised as a shared responsibility.

Responsibilities and governance

To ensure that safety is structurally embedded in our organisation, we have allocated clear roles and responsibilities:

- As employer, Unica ensures a safe working environment for example by conducting an annual Risk Inventory and Evaluation (RI&E) and by regularly monitoring safety measures. This system makes it possible to identify and tackle safety risks as they arise.
- The QHSE, Security & Risk director is responsible for the organisation-wide safety strategy and promotes a culture of risk awareness focused on safety. All safety incidents are systematically recorded via the Safe Unica app. We also operate a QHSE dashboard to permanently monitor safety targets.
- Managers and senior staff contribute actively to compliance with and implementation of safety guidelines within their teams. They are responsible for quarterly workplace inspections and for drawing up measures to immediately tackle any identified risks. Findings and points for action are followed up by management staff and recorded in the app and on the dashboard.
- Employees are the heart of the safety policy and are actively encouraged to report safe and unsafe situations. Field service employees are trained according to the SCC method and are informed of basic safety protocols via the Generic Gate Instructions. Employees are made aware of their personal responsibility for safety in the form of continuous training and information provision.
- Subcontractors must comply with the safety and environmental standards as laid down in the contract conditions. This includes the obligation to draw up a project safety plan, a project environmental plan and a project quality plan, based on compulsory compliance with SCC certification and the Safety Culture Ladder (SCL, at least step 2).
- Temporary employees and self-employed contractors must be SCC certified and at all work locations are required to fill out a ‘first time on the worksite’ form that is checked by the senior service engineer. It goes without saying that all temporary employees and self-employed contractors must comply with all safety instructions and procedures.

Unica is one of the initiators behind the Governance Code for Safety in Construction (GCVB) and is an active player in improving safety standards within the sector. In collaboration with other sector organisations, in 2023 we signed the covenant for safe working with insourced personnel, in which we are committed to sustainable and safe cooperation within the chain with the Federation of Dutch Contractors (AFNL), ABU and NBBU.

Information, training and communication

Unica invests continuously in the safety awareness and expertise of its employees. We operate a set of 10 safety behaviour rules which are regularly brought to the attention of the workforce and are an integral part of our national introduction programme. These rules help promote a preventive approach and contribute actively to raising safety awareness within all layers of the organisation. We ensure open communication on working conditions and safety issues. Employees are actively involved in improving the working environment in the form of regular feedback sessions and safety meetings.

The Safe Unica app plays a central role in identifying, registering and following up on safety incidents. Via this easily accessible platform, employees and their managers can quickly report (near) accidents and hazardous situations. These reports are immediately processed and followed up on so that preventive actions can be taken. We encourage the reporting and registration of incidents via the app as a valuable tool for contributing to the safety culture within our company. As such, the use of the app helps maintain a transparent and learning organisation culture.

Field service staff regularly receive information and training focused on their work activities to ensure they remain aware of work risks and to teach them how to work safely. This programme includes SCC training courses on such subjects as electrical engineering safety training, the safe use of aerial work platforms, (mobile) scaffolding, working with hazardous substances and for example safe driving behaviour. To further mitigate risks, we issue personal protective equipment (PPE) to all field service employees.

Whenever the adopted safety rules are violated, employees are called to account. In the case of repeat violation, the employee in question may be refused access to the work location or receive an official reprimand.

In 2024, we developed a safety guide that describes our safety policy. The guide is issued to all employees of our group of companies and is handed out during our introduction training so that new employees are also informed of the safety instructions that apply within our company.

Measures

In addition to a clear focus on information provision, training and preventive measures, we have introduced a series of measures that help assure safety:

- Risk Inventory and Evaluation (RI&E): We conduct ongoing RI&Es to map out potential risks and to take appropriate measures. The RI&E is updated and adjusted each year.
- Health promotion: We promote a healthy lifestyle among our employees including an ergonomic work posture, health checks and encouraging sport and exercise. We also offer support in stopping smoking and promote a healthy diet.
- Workplace investigation: We regularly conduct workstation investigations to ensure that workplaces meet ergonomic requirements. As necessary, adjustments are made to reduce physical burdens and to increase the comfort of employees.

The measures we take in respect of our core activities in the field of technical service provision aimed at minimising risks and guaranteeing the safety of users of technical systems include:

- Maintenance and Inspection: We operate a systematic maintenance and inspection programme consisting of periodic inspections and preventive maintenance. This programme guarantees the reliability and safety of technical systems.
- Safety procedures: We operate a set of documented safety procedures for the use of technical systems, including instructions for use, Lockout/Tagout (LOTO) procedures, guidelines for personal protective equipment (PPE) and emergency procedures.
- Incident reporting and investigation: All incidents and near-incidents relating to the use of technical systems are recorded and investigated. The findings are used to improve our policy and procedures.

Evaluation

Unica complies with the SCC certification requirements and has reached level 3 on the Safety Culture Ladder. Our goal for the medium term is to reach level 4. Implementation of and compliance with the safety policy are frequently monitored in the form of workplace inspections and analyses of incident reports in our Safe Unica app. Internal and external safety audits are also carried out during the course of the year. These periodic audits and assessments of our safety procedures ensure we continue to maintain the highest safety standards.

The management of the various offices and divisions continuously monitor all data and findings and where necessary take corrective action to ensure that risks are managed in time and to encourage a culture of continuous improvement. The QHSE dashboard offers management and the board an insight into the safety performance and incident analyses at Unica. Findings generated by the Safe Unica app are aggregated on the dashboard. This data-based approach makes it possible to identify and tackle safety risks. The dashboard also plays a crucial role in periodic reporting and in assessing the progress of safety policy in accordance with the CSRD requirements.

Our working conditions and absenteeism policy lists the responsibilities relating to working conditions and prevention tasks. The policy is evaluated annually and amended where necessary in order to ensure continued compliance with legislation, regulations and changing circumstances. Any feedback from employees is taken into account in this evaluation. We comply with all legal requirements in respect of working conditions, including the Working Conditions Act and the Working Conditions Decree.

Internal KPIs have been laid down for the total number of safe/unsafe situations or safety incidents reported in the Safe Unica app. All accidents and near-accidents are recorded and investigated, to prevent the risk of recurrence. The findings are used to improve our policy and procedures. Our objective is to continuously reduce the number of accidents. Our overall goal is zero lost time accidents and an accident frequency index (IF) of <5. Specific prevention policy has been developed for the top 3 causes of accidents.

	2024	2023	2022	2021	2020
Number of employees	4,413	3,739	3,555	3,297	2,702
Number of hours worked	8,653,400	7,328,440	6,967,800	6,462,120	5,295,920
Number of lost-time accidents 1-15 working days	12	15	21	19	13
Number of lost-time accidents > 15 working days	6	8	10	9	6
Number of accidents with fatal outcome.	0	0	0	0	0
Number of industrial accidents with lost time (3+4+5)	18	23	31	28	19
IF (accident frequency index)	2.1	3.1	4.4	4.3	3.6
IF average for the last 5 years	3.5	3.5	3.5	3.2	2.9
Number of lost-time days due to accidents	490	846	885	756	565
SR (average duration lost time / Seriousness index (days))	27.2	36.8	28.5	27.0	29.7
TCIR (Number of accidents in relation to number of production hours)	10.5	14.5	14.8	13.0	13.8
TCIR average for the last 5 years	13.3	13.2	N/A	N/A	N/A
Number of notifications to the Netherlands Labour Authority	4	2	2	0	3

Health and vitality

Healthy and vital employees help ensure good quality staffing levels and sufficient labour capacity. Within our policy we focus on two aspects, namely absenteeism and vitality.

Our working conditions and absenteeism policy aims to ensure the sustainable employability of the workforce and to increase productivity. It is aimed at restricting health risks, reducing absenteeism due to sickness and promoting reintegration.

To prevent health problems, we promote the vitality of our workforce with an ongoing sustainable employability programme. This programme inspires and supports employees in such areas as vitality, home/work balance, and (social) safety. We also operate flexible work schemes that help maintain a good balance between work and home, such as flexible working hours, hybrid working from home and parental leave. We also offer our employees a Preventive Medical Examination (PMO), an option they can take up on a voluntary basis.

Social safety

Attention for social safety is another important component of our policy. We aim to create and safeguard a safe, respectful and inclusive working environment in which every employee is protected against undesirable behaviour such as bullying, discrimination, intimidation and violence.

This policy is further elaborated in the Speak out! programme. Speak out! consists of three core elements:

1. Policy on Undesirable Behaviour

The aim of this scheme is to prevent and tackle any forms of undesirable behaviour such as aggression and violence, sexual harassment, discrimination and bullying. The objective is to create a safe and respectful working environment in which everyone feels appreciated and respected.

2. Integrity Reporting Scheme (whistleblower scheme)

The Integrity Reporting scheme was established to offer a framework for the (anonymous) reporting, investigation and tackling of situations of abuse such as infringements of legislation and regulations, company policy and ethical standards, including fraud, bribery and corruption, illegal activities, money laundering and irregular transactions. The aim is to create a safe and trusted environment in which employees and other stakeholders feel safe to report cases of abuse without fear of reprisals.

3. Labour Conflicts Scheme

The Labour Conflicts Scheme was drawn up to provide a structured approach for dealing with labour conflicts. Labour conflicts should be taken to mean situations in which there is a difference of opinion or dispute between an employee and the organisation which influences labour relations and the working environment. The aim is to solve any such disputes or conflicts in a fair, efficient and respectful manner so that a positive and productive working environment can be maintained.

Job security

Good working conditions are one of the core pillars of our personnel policy. Our aim is to bring about long-term job security for our employees. To make this possible, we strive for:

- Maximum attainable uniformity in the employment conditions landscape (fixed and variable salary, pension, mobility and allowances);
- A transparent policy of remuneration (growth) and equal wages;
- A distinctive and diverse remuneration policy, for example generationally aware, ‘green’, etc.;

- A cost-conscious/flexible policy on employment conditions that is capable of adapting to changes in commercial and economic developments.

Employees start with a fixed-term contract and (following approval of good performance) are awarded a permanent contract after one year. There are also flexible contract forms, but in all cases (on the basis of ‘statutory’ agreements), the aim is to eventually offer employees permanent employment at Unica. Temporary employees and self-employed persons are mainly deployed for temporary assignments requiring specific expertise. We make every effort to prevent the risk of concealed employment.

The majority of companies at Unica are affiliated to the collective labour agreement for Technical Installation Companies. In 2024, this collective labour agreement applied to 83% of all employees. Collective labour agreements are negotiated within the sector and applied in their entirety by Unica to the appropriate target group. Employees of companies not primarily involved in installation work are not subject to this collective labour agreement. They are subject to their own conditions of employment, which are negotiated and applied in a balanced manner. Agreements on employment conditions are submitted for approval to the Joint Works Council in accordance with the Works Councils Act.

Number of employees

	2024	Male	Female	Unspecified	2023	Male	Female
Number of employees	4,413	3,872	540	1	3,977	3,521	456
Temporary employment	430	358	71	1	384	324	60
Permanent employment	3,983	3,514	469	0	3,593	3,197	396
Support staff (%)	16%	10%	60%	0%	17%	11%	61%
Indirect (%)	37%	38%	29%	100%	39%	38%	30%
Direct (%)	47%	52%	11%	0%	45%	51%	9%
Number of FTEs	4,187	3,749	437	1	3,776	3,417	359

Reference date: 31 december 2024

Inflow and outflow of employees

	Inflow 2024						
	Male	%	Female	%	Unspecified	%	Total
< 30 years	197	35%	29	26%	1	100%	227
30-39 years	144	25%	33	30%	0	0%	177
40-49 years	99	18%	23	21%	0	0%	122
50-59 years	105	19%	22	20%	0	0%	127
> 60 years	20	4%	4	4%	0	0%	24
Total	565	100%	111	100%	1	100%	677

	Outflow 2024					
	Male	%	Female	%	Total	%
< 30 years	100	21%	18	24%	118	21%
30-39 years	120	25%	19	25%	139	25%
40-49 years	113	24%	19	25%	132	24%
50-59 years	81	17%	15	20%	96	17%
> 60 years	61	13%	4	5%	65	12%
Total	475	100%	75	100%	550	100%

Percentage inflow and outflow based on the average number of employees in 2024. Reference dat: 31 december 2024

Diversity

Our policy on diversity and inclusion (D&I) is aimed at creating a working environment in which every employee feels appreciated and respected. We aim to reduce and prevent discrimination on the basis of gender, age, ethnicity, religion, parental status, education, physical and mental capacities and sexual preference. In our policy, we aim to achieve a balanced representation of gender, age and ethnicity.

In support of this policy, we have established the diversity platform Unique, responsible for organising a range of programmes. Examples include a mentor programme for women within our company and a network for young employees. The programmes contribute to an inclusive culture in which everyone has the opportunity to be themselves and to achieve personal development. We are also focusing increased attention on neurodiversity. Another core element of the policy is aimed at raising awareness of unconscious bias by providing online training courses.

Training and development

We wish to make use of our innovative capacity and specialist knowledge to play an ongoing and distinctive role in the dynamic technical market. This places considerable demands on our employees and management staff. Unica offers numerous opportunities for its employees to deploy and further develop their talent to help them contribute to our ambitions. This calls for a stimulating learning and working environment with a clear focus on the unique qualities of our employees and extensive opportunities for internal mobility and career development. Our digital learning platform Studica plays an essential role in this policy. For an overview of the training and development initiatives currently available, [see our management report](#).

Category	2024	2023
Personal effectiveness	458	936
Management	325	1,149
Customer and Commerce	55	139
Project management	419	1,468
Professional training	4,402	2,957
Digital training	593	881
Total	6,252	7,530
Spend on training per year	2024	2023
Avarage amount of hours/employee	26	26

An average of 26 hours per employee per year is spent on training (2023: 26 hours). There is no subdivision by employee category. 95% of employees are regularly informed about performance and career development. 27% of employees have a personal training plan (2023: 25%).

Social return

As part of our personnel policy, we also offer opportunities to people with a vulnerable labour market position, for example the long-term unemployed, people with an occupational disability, young people with no start qualification and other vulnerable groups. We identify possibilities within the organisation to offer employment opportunities to people with a history of limited participation in the labour market, such as internships, apprenticeships and temporary and permanent jobs.

We measure the status of our social return performance according to the CSR Performance Ladder. As well as being a measuring instrument, the performance ladder is also a quality label that enables organisations to evaluate their contribution to corporate social responsibility in their own business practice and in their chain. The qualification reflects the active efforts by the company to create employment opportunities for people with a vulnerable position on the labour market. Since 2021, Unica has been qualified in step 2 of the CSR performance ladder. This means that we deliver above average performance in the extent to which we have created job opportunities (both directly and indirectly) for the relevant target group. As such, we are among the 22.5% best performing companies in the

S2 - Employees in the value chain

Material topic	Results 2024	Actions 2025	Targets
Working conditions - Health and safety - employees in the value chain	<ul style="list-style-type: none">• Policy description based on current situation ready	<ul style="list-style-type: none">• Policy and process to guarantee that subcontractors can only work if commercially SCC certified in place• Training of project managers and contract managers in procedures for the safety of workers in the chain	<ul style="list-style-type: none">• Accident frequency index (IF) <5

If they wish to do business with our company, our suppliers must sign the Code of Sustainable Supply (CoSS). This code contains a series of conditions relating to the health and safety of workers in the chain.

As yet no specific policy has been formulated with regard to the due diligence process and the monitoring of compliance with the code in the chain. The initial draft version is expected to be ready in 2025.

Safety

For employees in the chain, the same underlying principle applies as for our own employees: *we work safely or we do not work at all!*

The employees of our partners must be protected from exposure to potential hazards (e.g. dangers relating to electrical and other energy sources, fire, vehicles and falling hazards). This situation is monitored in the form of adequate supervision and safeguarding by means of sound procedures and permanent safety training. If these measures prove insufficient to mitigate the risks, employees are provided with appropriate, well-maintained personal protective equipment and educational material about hazard-related risks.

Incident response plans are prepared (and updated) as a means of identifying potential accidents and responding to accidents and other emergencies, and for preventing and limiting the harmful consequences these incidents can have for the environment. Wherever necessary, action plans for emergencies are evaluated and improved, in particular after any accident or other emergency has occurred. Wherever practically possible, these plans are also regularly tested.

Employees of third parties and our own employees must always comply with the applicable safety agreements at the customer location. All parties are encouraged to express any concerns they may have about safety problems.

Free choice of work

Forced labour, slavery and human trafficking are unacceptable to us. The same applies to the transport, accommodation, recruitment, trafficking or receiving of persons by means of threat, violence, coercion, abduction or fraud for the purposes of work or services. All work must be undertaken voluntarily and employees must be free at all times to leave work or to terminate their contract. It is also unacceptable for employees to be required to make a downpayment to be allowed to work or for employees to be required to surrender their proof of identity to their employer, upon entering service. It is also unacceptable to withhold the salary, other payments, personal property or papers of an employee (except in the case of a sanctions policy that is acceptable to and agreed by the parties, in advance).

Avoiding child labour

At no point in the value chain is use made of child labour. The term ‘child’ refers to the definition from the ILO-IPEC and Article 32 of the United Nations Convention on the Rights of the Child (UNCRC). Employees below the age of 18 years are not permitted to carry out work which could be harmful to the health and/or safety of young employees. A supplier is permitted to offer valid internship placements, as long as they satisfy the requirements of the UN Convention on the Rights of the Child.

Working hours

The working week of suppliers may not be longer than the maximum laid down by law (Working Hours Act). The employees of suppliers are entitled to paid holiday in accordance with the ILO standard. Employees may refuse to work overtime, without the threat of fines, penalties or dismissal.

Humane treatment

Cruel and/or inhumane treatment are not permitted. This includes sexual harassment, sexual abuse, corporal punishment, mental or physical force or verbal abuse of employees. The same applies to the threat of such treatment. Disciplinary policy rules and procedures in support of these requirements must be clearly laid down and shared with employees.

Zero discrimination

As laid down in the Dutch Constitution, discrimination is not permitted on the basis of race, skin colour, age, gender, sexual preference, ethnicity or national origin, disability, pregnancy, religion, political conviction, trade union membership or marital status, when taking on personnel and/or in respect of employment law practices such as access to training, promotion and the awarding of bonuses. We expressly reject any such forms of discrimination. Disabled employees will be offered all reasonable modifications to allow them to perform their work.

Safety of equipment

All production and other equipment at suppliers must be inspected at least once a year for possible safety risks. Suppliers must ensure that any defects or shortcomings are repaired in time. The aim of any repair measures is to solve the problem, before assessing the effectiveness of the repair. Physical security systems and locks must be improved and maintained wherever equipment represents a risk of injury to employees.

Communication on health and safety

Suppliers must offer employees appropriate information on health and safety in their native language. Health and safety-related information must be provided clearly at the work location.

S4 - Consumers and end users

Material topic	Results 2024	Actions 2025	Targets
Privacy of customers/end users	<ul style="list-style-type: none">• Appointment of Privacy Ambassadors per cluster	<ul style="list-style-type: none">• Implementation of Privacy Ambassadors per cluster	
Health and safety of customers/end users		<ul style="list-style-type: none">• Policy based on current situation ready and action plan for gaps in place	

Unica’s overall policy on privacy, safety and health is particularly focused on our own employees and workers in the value chain. Thanks to our ongoing efforts in these areas and the measures we take where necessary, we can also be considered a safe and reliable partner for consumers and/or end users. Nevertheless, we still recognise the necessity of

recording, monitoring and reporting on our policy, efforts and objectives for these specific target groups.

G1 - Business conduct

Material topic	Results 2024	Actions 2025	Targets
General disclosures, policy and objectives	<ul style="list-style-type: none">• Policy description based on current situation (in final stages)	<ul style="list-style-type: none">• General disclosures ESRS 2 ready	
Corporate culture			
Corruption, fraud and bribery: prevention and investigation	<ul style="list-style-type: none">• Development of compliance training on online learning platform Studica	<ul style="list-style-type: none">• Implementation of supplementary compliance training• Training compulsory for all employees• Monitoring of the number of employees who have completed training	<ul style="list-style-type: none">• 100% new employees have completed training
Corruption, fraud and bribery: incidents			
Data security	<ul style="list-style-type: none">• Implementation of technical protection measures• Testing of crisis and incident response processes• Deployment of third party risk management (IT Risk)	<ul style="list-style-type: none">• Implementation of ISO 27001 policy and controls• Implementation of NIS2 policy and controls	<ul style="list-style-type: none">• 100% of new employees have completed IT Security training• Unica Groep ISO27001 certified• Unica Groep NIS2 compliant

Sustainable business practice is fundamentally embedded in the corporate culture at Unica and is coordinated by the Business Services department QHSE, Security & Risk. The various programmes covered by Environment, Social & Governance (ESG) are implemented by the Business Services departments, in collaboration with the business clusters.

The Board of Directors bears final responsibility for the management and utilisation of the material impacts, opportunities and risks, and is accountable for these issues to our internal and external stakeholders. The Sustainability Board is made up of various members of the Executive Committee namely the directors of the QHSE, Security & Risk, Legal, Procurement & Supply Chain, Facility Management and Human Resource Management departments. The Sustainability Board meets 6 times a year and is responsible for the adoption, monitoring and evaluation of the sustainability programme and the related performance.

Once every quarter, progress on ESG implementation and the results achieved are discussed with the Board of Directors. The Supervisory Board and the complete Executive Committee are brought up to date once every six months.

Integrity

Integrity is a clear priority within our corporate culture. To safeguard integrity, we operate a code of conduct that is shared with and applicable to all internal and external employees. This code comprises the most essential standards, values and guidelines that apply within our companies. Crucial topics such as health, safety, the environment and integrity are all included in the code of conduct. It goes without saying that our company and our employees comply with all relevant legislation and regulations, including environmental, privacy and labour laws.

Our compliance policy is an integral component of the code of conduct as elaborated in the Speak out! programme - a set of guidelines and procedures focused on integrity and tackling undesirable behaviour. The programme describes what is expected of both management and employees and the appropriate response to (suspicions of) undesirable behaviour, abuse or violations of business integrity, including the reporting procedure to be followed. A central aspect of the programme is the emphasis on training and awareness of employees, aimed at encouraging a culture of openness and responsibility.

The aim of the code of conduct and the Speak out! programme is to create a working environment in which employees feel safe and appreciated, to encourage a culture of integrity and a sense of responsibility, to mitigate legal and financial risks and to protect the reputation of Unica.

The Business Services Legal department is responsible for the Speak out! policy, the underlying schemes and for monitoring compliance. We employ our own Compliance Officer and where necessary call in external experts to support policy implementation.

Procedures are in place for the (anonymous) reporting, (independent) investigation and tackling of undesirable situations, abuse and conflicts. There are also procedures for registering submitted reports and following up on any corrective actions that arise from the investigation findings. We use the Complylog system to ensure that reporting remains anonymous.

Reports concerning the functioning of the schemes are discussed annually with the Supervisory Board, the Board of Directors and the Executive Committee and with the Joint Works Council. Following these discussions, wherever necessary, additional measures can be taken and policy aspects refocused. All procedures are described in the separate policy documents and the abuse scheme can be consulted by both internal and external parties.

Corruption, fraud and bribery

The policy on fraud and bribery is in line with the UN Convention and comparable to the Dutch Whistleblower Regulations. Our code of conduct contains guidelines for preventing and investigating bribery and corruption and describes our response to accusations of bribery and corruption. Given the growing attention for risk awareness, we continue to invest in knowledge and refresher training on this topic.

We also operate various processes for preventing corruption, fraud and bribery. Examples include a clean desk policy, the four-eyes principle and shared roles and responsibilities, for example for registering and making payments. We also use clear authorisation charts.

Reports generated by people, processes and systems lead to the identification of incidents. Our compliance team ensures that these processes are followed up on and complied with. If there is a serious suspicion of an incident, procedures are in place to shut down systems if this is necessary to prevent further spread or contamination. The management chain involved in a case is kept separate from the incident investigation. If necessary, we call in an external agency to conduct an independent audit. Incidents are reported to the Board of Directors and as necessary the Supervisory Board.

Data protection

Unica works hard to ensure the security of information within its own business operations, and with regard to its business relations and customer services. As the company itself and the complexity of our customer solutions grows, so too does the importance of robust information security. The information security policy at Unica is therefore focused on two core elements: Data protection and Privacy.

A focus on data protection is essential to maintain the confidentiality and integrity of all the technical installations and systems we manage, both for our customers and for internal processes. At the same time we guarantee that personal data is processed in accordance with relevant legislation and regulations, such as the General Data Protection Regulation (GDPR). This policy helps ensure the reliability of our services and reinforces the trust of our clients in our business as a partner in sustainable and safe technical solutions.

Through continuous improvement and innovation, we integrate information security in all our business processes, systems and our corporate culture, from operational to strategic level. This approach forms the basis for futureproof and secure business operations.

The policy on information security is the responsibility of the Business Services department QHSE, Security & Risk, headed by the QHSE, Security & Risk director and the Security Officer. The team is responsible for both physical and IT security and ensures compliance with all relevant legislation and regulations, such as the Network and Information Security directive (NIS 2) and the Digital Operational Resilience Act (DORA).

Certification and directives

Various companies that belong to our group, including Nsecure, EAL, Unica ICT Solutions, Regal Partners and Bavak, are ISO 27001 certified. This demonstrates that they comply with the highest standards for information security. These companies work with very sensitive information, often in critical environments, a situation. This makes a very sound security policy. The ISO 27001 standard offers extensive measures, from physical security through to IT security, and helps us effectively manage risks and protect sensitive data.

To reinforce information security policy within the whole of the Unica Groep, the company has committed to obtaining ISO 27001 certification for the entire organisation. Although the NIS2 directive has not yet been fully implemented by the Dutch government, we have chosen to set compliance with this directive as a company-wide target. This underlines our proactive approach to cybersecurity and our desire to set the pace in protecting customer and corporate information.

Measures and programmes

We are taking a series of measures to reinforce our information security:

- **Awareness programmes:** These programmes are focused on increasing awareness of data protection in combination with attention for privacy.
- **ISO 27001 & NIS2** compliant information security policy: Focused on guaranteeing both physical and IT security.
- **Supply Chain Risk Management:** We check suppliers for their security measures and maturity in respect of information security.
- **Operational Technology (OT) and Internet of Things (IoT) security:** Safeguarding the security of industrial IT and building management systems.
- **External recognition and insurance:** We have taken out cyber insurance thereby demonstrating that the organisation is insurable and satisfies the required security standards. This insurance serves as an external reaffirmation that shows that we have our house in order in the field of information security.
- **Future projects and innovations:** We are constantly at work improving our information security. Over the coming years, we will roll out projects including information classification and data loss prevention. These projects are focused on the more secure storage of sensitive information and the prevention of data loss from our company.

Privacy

Unica has established a proactive and structured privacy policy. By implementing an extensive series of measures, clear procedures and a systematic approach to reporting, we strive to guarantee the privacy of all stakeholders, including employees, chain partners and customers, and to comply with the requirements of the General Data Protection Regulation (GDPR). The focus is on awareness and knowledge sharing, both essential for the effective application of a privacy policy.

With regard to privacy, we implement the following measures:

- **Data processing agreements with external parties:** We always sign data processing agreements with external parties who process personal data. The Procurement & Supply Chain department checks whether suppliers process personal data and as necessary adapts these agreements to the specific situation.
- **Protocol on data breaches:** Our protocol on data breaches provides guidelines for the response in the event of incidents involving personal data. This includes assessing the seriousness of the incident, informing all parties involved and determining whether the incident needs to be reported to the Dutch Data Protection Authority. All incidents are centrally registered by the QHSE Security & Risk department. Central registration provides an insight into trends and helps improve monitoring and evaluation.

We also encourage internal awareness of privacy issues via a clear communication structure, targeted campaigns and training programmes that introduce employees to the complexities of information security and the careful handling of personal data. This approach promotes a culture of alertness and compliance. Important elements of this awareness programme are:

- **Workshops:** We organise different workshops to improve employee awareness of privacy legislation and their specific responsibilities. Privacy and security experts are responsible for the sessions, supplemented by guest speakers to explain the latest developments, such as the risks of AI for privacy. This helps increase the level of knowledge within our organisation.
- **Privacy Ambassadors:** A Privacy Ambassador has been appointed for every department within our Business Services organisation. The Ambassador acts as first point of contact for privacy issues and harmonisation of data processing agreements.
- **‘Golden Rules’ for privacy:** Flyers and posters explaining the ‘golden rules’ for privacy are used to draw attention to important guidelines.
- **Online training courses:** Employees can use our online learning platform Studica for various training courses including specific courses on privacy, phishing and the use of AI.

- **Privacy documents:** A variety of tools and policy documents give employees an understanding of privacy rules and policy frameworks in respect of various topics.
- **Quick Reference Cards:** Essential policy principles are summarised in clear flyers to assist our employees in maintaining awareness of privacy in their daily activities.

In addition to internal awareness campaigns, we also operate a digital system in our information security policy in which security incidents and data breaches are constantly registered and monitored. The QHSE, Security & Risk department supervises these reports and provides employees with the tools and guidelines they need for secure data management. Every year, the effectiveness of the policy is the subject of a report based on both quantitative data and qualitative evaluations of incidents.

We also organise regular internal evaluations to analyse the impact of the measures and to identify points for improvement. A clear communication structure ensures transparent information provision to employees and anyone involved in incidents. The Board of Directors periodically assess and approve the information security policy in conjunction with a reporting protocol for critical incidents in accordance with the GDPR and the future requirements of the Network and Information Security directive (NIS 2). To date, thanks to the detection measures we have in place, no incidents have been registered that require compulsory notification.