

**UNIJA ETL  
GROUP  
SUSTAINABILITY  
STATEMENT  
2025**

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GLOBAL



# UNIJA ETL GROUP SUSTAINABILITY STATEMENT

In the Unija ETL Group, we have approached the preparation of the sustainability statement for 2024, which is prepared in accordance with Directive 2022/2464/EU on corporate sustainability reporting (CSRD). This directive has also been transposed into Slovenian legislation through amendments to the Companies Act (ZGD-1M), the Auditing Act (ZRev-2C) and the Financial Information Transparency Act (ZTFI-1C).

According to the above regulations, large companies that are public-interest entities with more than 500 employees are obliged to prepare a sustainability statement for 2024. The Unija ETL Group is not subject to reporting for 2024, nor does it belong to the circle of companies that are required to report in subsequent years. Regardless of this, we have decided to undertake the preparation of the sustainability statement voluntarily, and in this way we also demonstrate a firm commitment to the values of sustainable development and social responsibility, which have been one of the fundamental guidelines of our operations for many years and have in a way already become the DNA of the Unija ETL Group.

The sustainability report in question is prepared in a transparent manner, in accordance with the European Sustainability Reporting Standards (ESRS), and is equipped with labels set by the Commission delegated act.

At the Unija ETL Group, we intend to prepare a sustainability statement for the coming years, with a focus on upgrading the statement for 2024, comprehensive preparation of the report, cooperation of all relevant departments, strategic integration of sustainability reporting into business and the use of appropriate information technologies to ensure compliance and transparency of reporting.

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# I. BP-1 – GENERAL BASIS FOR THE PREPARATION OF SUSTAINABILITY STATEMENTS

The Unija ETL Group integrates sustainability through environmental responsibility, social inclusion and good management practices, which forms a holistic approach to sustainable development and social responsibility. An integrated approach allows us to operate as a socially responsible company that pays attention to both economic, social and environmental aspects of entrepreneurial activity, which contributes to both long-term success and a positive impact on society and the environment.

In previous years, we have included sustainability topics in the Group's annual report as part of non-financial reporting, and for the financial year 2024 we have prepared a separate sustainability statement in accordance with:

- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088;
- Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting;
- Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards;
- Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of the information to be disclosed by undertakings to which Article 19a or 29a of Directive 2013/34/EU applies on environmentally sustainable economic activities.

The sustainability statement of the Unija ETL Group has been prepared on a consolidated basis, with the scope of consolidation being the same as in the financial statements – the report in question covers all subsidiaries included in the consolidation.

Based on the analysis of double importance, the Unija ETL Group has included in the report mainly information on sustainability topics and impacts, risks and opportunities arising from its own activities, and partly also information related to or arising from the upper and lower parts of the company's value chain. This will be explained in more detail in the chapter Significant Impacts, Risks and Opportunities and Their Relationship to Your Strategy and Business Model (SBM-3) and the chapters on individual thematic standards, as information on the company's value chain varies depending on the nature of each sustainability topic. At the same time, any efforts to obtain the necessary information or the reasons why not all data could be obtained will be explained.

The Company exercised the option to omit specific information relating to »know-how«, sensitive data, intellectual property, know-how or results of innovation, in accordance with ESRS 1, Section 7.7, in particular in the areas of financial materiality assessment, S1 - Own workforce and G - Governance.

On the other hand, the company did not make use of the possibility to exclude from the disclosures envisaged events or matters that are the subject of ongoing negotiations, as provided for in Article 19a(3) and Article 29a(3) of Directive 2013/34/EU.

# II. BP-2 – DISCLOSURES RELATED TO SPECIAL CIRCUMSTANCES

## 1. PERIODS

This sustainability statement covers the period from 1.1.2024 to 31.12.2024. The report shall take into account the time periods as defined by the ESRS 1, namely:

- short-term: up to a year,
- medium-term: from one to five years,
- long-term: over five years.

## 2. ASSESSMENT OF THE VALUE CHAIN AND SOURCES OF UNCERTAINTY OF ASSESSMENT AND RESULTS

Metrics that include upstream and/or downstream data and are estimated using indirect sources are disclosed in accordance with accounting principles for each thematic standard.

Quantitative metrics and monetary amounts for which the degree of measurement uncertainty is high are also disclosed for individual thematic standards. At the same time, the reasons for the measurement uncertainty are given and the assumptions, approximations and judgements used by the company in the measurement are disclosed.

### III. GOV-1 – THE ROLE OF ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

#### 3. COMPOSITION AND DIVERSITY OF THE MEMBERS OF ITS ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

The Unija ETL Group is made up of several companies with different management. With the exception of UNIJA ETL Holding d.o.o., Ljubljana the representation of directors is independent. The responsibilities and powers of the management are determined by the applicable regulations and the Memorandum of Association. The companies in the group do not have supervisory boards. The subsidiaries that are part of the Unija ETL Group are managed by the directors of the subsidiaries.

Information on the composition and diversity of the members of the administrative or management bodies is given in the following Table No 1.

**Table 1** - Information on the composition and diversity of members of administrative or management bodies

Number of executive members	Number of non-executive members	Representation of employees and other workers	Experience in relation to the sectors, products and geographical locations of the company	Share by gender and other aspects of diversity	Percentage of Independent Members
12	3	Both executive and non-executive members are employees of companies that are part of the Unija ETL Group.	Many years of experience in the world of finance, accounting, IT, law, sales, marketing.	Among the executive members: <ul style="list-style-type: none"> <li>• 7 men (58%) and</li> <li>• 5 women (42%)</li> </ul> Among the non-executive members: <ul style="list-style-type: none"> <li>• 2 men (66%) and</li> <li>• 1 woman (33%)</li> </ul>	100 %

#### 4. ROLE AND RESPONSIBILITIES OF MANAGEMENT BODIES

In accordance with the mandate and authority of the shareholders and management of the companies in the Unija ETL Group, the management as a whole is responsible for the control of significant impacts, risks and opportunities.

Within the framework of the existing general system of management and control of financial and business risks, the management also monitors, supervises and manages impacts, risks and opportunities in the ESG area. The official management did not delegate this role to a specific management position or committee within the Group. Together, the management addresses ESG topics in a uniform manner for the entire Unija ETL Group. Responsibility lies with the entire management and has not been delegated to an individual internal department. Individual area managers are internally and informally responsible for the preparation of reports, analyses, proposals for measures and recommendations, the adoption of which is decided by the management.

Informal assignments within the group by individual ESG topics or areas:

- S1 Own workforce: Head of human resources
- S2 and S4: Sales Manager
- E: Chief Compliance Officer
- G: Head of the Legal Department
- Cybersecurity: IT Manager

The Group has an internal control system in place at all levels and areas of business with the aim of managing impacts, managing risks and exploiting opportunities. Control activities and responsible bodies are recorded in internal acts (job systematization, authorizations, organizational instructions, ISU Internal Group Standards and other internal acts).

Supervision over the work of the heads of areas is carried out through regular internal reporting lines to management. Activities are carried out on a monthly basis at the company's management colleges throughout the region, aimed at providing regular information, setting goals regarding significant impacts, risks and opportunities, and monitoring progress in achieving them.

Management provides the appropriate skills and expertise to oversee sustainability matters directly through the managers in charge of each area, their knowledge or additional training. If necessary, the management provides additional assistance from internal or external experts to the heads of areas.

## **IV. GOV-2 – INFORMATION SUBMITTED TO THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES OF THE COMPANY AND SUSTAINABILITY MATTERS DEALT WITH BY THESE BODIES**

The management is informed by the heads of the areas about the significant impacts, risks and opportunities at regular monthly meetings of the company's management within the entire region. Area managers regularly inform management of the results and effectiveness of the policies, measures, metrics and targets adopted to address significant impacts, risks and opportunities.

In all major business and strategic decisions, the management takes into account the significant impacts, risks and opportunities as well as the effects of the decisions made on the affected stakeholders to the greatest extent.

During the reporting period, management considered the following significant impacts, risks and opportunities:

- Job security for employees
- Two-way communication between employees and management
- Employee-friendly working conditions
- Employee turnover
- Ensuring a sufficient number of appropriately qualified staff
- Security of end-user data
- Cybersecurity
- Corporate Culture
- Environmental impacts in the form of greenhouse gas emissions

## **V. GOV-4 – DUE DILIGENCE STATEMENT**

In the Unija ETL Group, sustainability due diligence procedures are prepared partially by individual areas of activity. The main aspects and steps of these processes are also reflected in the sustainability statement in question. They set strategic directions, measures and goals for each area, and at the same time allow us to monitor the progress of the implemented measures. In addition, we also relied on the already existing (partial) due diligence procedures in the double materiality assessment process itself, where we identified and assessed the impacts, risks and opportunities of the Unija ETL Group on the basis of already existing information. In this regard, it is worth highlighting the already existing quality management system (obtaining ISO 9001 certification) and the information security management system (obtaining ISO 27001 certification). This is explained in more detail in section 7.4 Due diligence).

## VI. GOV-5 – RISK MANAGEMENT AND INTERNAL CONTROLS ON SUSTAINABILITY REPORTING

The internal control system and risk management in the context of sustainability reporting represent a structured and systematic approach to ensuring the quality, reliability and transparency of sustainability information. They include a clear definition of responsibilities, risk assessment, appropriate control measures, and regular monitoring. Such a system enables organizations to effectively manage risks, improve stakeholder trust, and meet regulatory requirements in sustainability reporting.

The Unija ETL Group has an internal control system in place at all levels and areas of its operations, which ensures effective impact management, risk management and the exploitation of business opportunities, and all control activities and responsible entities are clearly recorded in internal acts.

An internal control system is essential to ensure compliance with the legislation, prevent irregularities and errors, and improve business efficiency. It enables the identification and management of risks, and at the same time supports the exploitation of business opportunities, which is crucial for the sustainable growth and success of the Group.

In the Unija ETL Group, internal controls are organized at several levels: strategic, operational and financial. Each level and business area has customized controls that manage specific risks. Control activities are carried out in accordance with the policies and procedures enshrined in internal acts, which ensures consistency and traceability of implementation and accountability.

Control activities are clearly defined in internal acts such as manuals, business procedures, internal rules, etc. Each control has a designated responsible carrier who is responsible for its implementation and monitoring. This puts in place a clear accountability system that allows for effective management and quick action in the event of any deviations or risks.

Such a system contributes to greater transparency and reliability of operations, reduces the possibility of errors or abuses and supports the achievement of strategic objectives. At the same time, it enables the Unija ETL Group to effectively manage risks and exploit opportunities, which has a positive impact on long-term stability and competitiveness in the market.

Although internal controls are complex and organization-specific, their success is based on clear documentation and the assignment of responsibilities, which the Unija ETL Group consistently implements at all levels.

## VII. SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

The Unija ETL Group mainly offers the following groups of services and serves clients in the following areas:

- accounting services,
- payroll calculation,
- tax, legal, financial and business consulting,
- IT services.

The distribution of the number of employees by geographical area is:

- Slovenia .....148
- Croatia .....100
- Serbia .....49
- Bosnia and Herzegovina .....39
- Montenegro .....29
- Macedonia .....22

### STRATEGY

The sustainability-related elements of the strategy and objectives of the Unija ETL Group are presented in thematic standards, separately for each impact, risk and opportunity.

### UPSTREAM OF THE VALUE CHAIN

The upper part of the value chain of the Unija ETL Group is mainly represented by IT license and component providers, external associates who provide assistance in the provision of services, and owners/landlords of premises used by companies in the Unija ETL Group. In addition, the upper part also includes providers of basic goods that are necessary for our operation, such as: electricity for the operation of equipment, energy sources for heating and cooling of premises and utilities.

### LOWER PART OF THE VALUE CHAIN

On the other hand, in the lower part of the value chain, the circle of our clients is very wide and diverse. Given that we offer services that most companies need for their operation (payroll, accounting, IT, consulting), we do not have a typical client who would come from a specific sector. It should be emphasized that as many as 99% of our clients are companies, the share of natural persons is negligible. Regardless of the fact that our direct clients are not natural persons, they are nevertheless an important stakeholder in the lower part of our value chain. For a large part of our services, we process the data of individuals (employees of our clients within the payroll and accounting department), which makes natural persons in some way part of our wider value chain.

## VIII. SBM-2 STAKEHOLDER INTERESTS AND VIEWS

### 5. STAKEHOLDERS OF THE UNIJA ETL GROUP

The purpose of this chapter is to explain who are the key stakeholders of the company, how the dialogue with them is established, and how their interests and views are taken into account in the business, strategy and business model of the Unija ETL Group.

#### 5.1 IDENTIFICATION OF STAKEHOLDERS

The stakeholders of the company are those who can influence the functioning of the company, or who can be influenced by the company. The two main stakeholder groups are:

- a. **AFFECTED STAKEHOLDERS:** posamezniki ali skupine, na katerih interese pozitivno ali negativno vplivajo ali lahko vplivajo dejavnosti podjetja ter njegovi neposredni in posredni poslovni odnosi vzdolž njegove vrednostne verige, ter
- b. **USERS OF SUSTAINABILITY STATEMENTS:** primarni uporabniki splošnega računovodskega poročanja ter drugi uporabniki izjav o trajnostnosti.

In the Unija ETL Group, we have identified the following **affected stakeholders who are key to the operation of our company:**

- a. **INTERNAL STAKEHOLDERS**
  - Own employees
  - Leadership
  - Owners
- b. **EXTERNAL STAKEHOLDERS**
  - Clients - customers
  - Suppliers
  - Financial institutions - banks
  - Local communities

#### OWN EMPLOYEES

Cooperation with its own employees is organized in several different ways, namely:

- through the EMPLOYEE ENGAGEMENT OFFICER (EEO). The purpose of the role of EEO in the Unija ETL Group is to maintain good relations between employees, promote open and respectful communication, and provide support in introducing changes and realizing the company's mission and values through various activities (which are also described in Chapter 11.2 - Channels and mechanisms for the implementation of two-way communication between management and employees). The role of the EEO shall be established within each country in which the Unija ETL Group operates. The role, tasks and method of appointment of the EEO are specified in the description of the process „ISU BO – 12 Employee engagement officer“. The EEO provides assistance

and support to employees in solving challenges and to leaders in leading teams in a way that regular monthly meetings are held (meetings are mandatory for managers). The EEO participates in or takes over the induction headquarters, monitors the onboarding process, organizes the circulation of employees by processes/departments, monitors the development of employees (talent and potential program), promotes good practices and health in the workplace, and gives initiatives and suggestions that improve employee well-being and communication. In the event of disputes, it advocates peaceful resolution or mediation.

- The management, which consists of Managing Directors („MD“), Business Directors („BD“), Process Leaders („PL“), Business Managers („BM“) and Team Leaders („TL“), actively cooperates with EEO and informs them about all decisions related to employees (salary system, changes in standards, hiring plan, reassignment, dismissals, etc.). The MD informs the EEO of all information related to employees (Employee Engagement Survey, Shared Services Survey, Exit Interview, etc.). The EEO has an interview with the MD for at least every 14 days. And also with BD/BM/PL if necessary.
- Regular monthly meetings of the employee and his manager.
- Annual interview – an in-depth meeting between the employee and their manager.
- **PROMOTING TWO-WAY COMMUNICATION:** The goal of promoting two-way communication in the company is to establish an open and collaborative environment where information flows between management and employees in both directions. This increases employee engagement, trust and motivation, enables better decision-making, faster problem resolution and encourages innovation and improvement. Such communication contributes to a better working climate, greater efficiency and effectiveness of the company. In the Unija ETL Group, we have established the following channels and mechanisms to promote two-way communication: active promotion by management, posters in the workspaces, annual and monthly interviews with employees, e-mail addresses for receiving ideas/proposals, promotion of a culture of communication, education, open door policy. Employee satisfaction surveys. Functioning of the EEO Department (Employee Engagement Officer).
- **OGSM WORKSHOPS:** implementation of workshops where the management consults with employees on various aspects of business, process analysis and the introduction of innovations and improvements. Implementation of individual and group courses and workshops where action is taken. Vote on proposals.
- **PROPOSALS FOR INNOVATION, CHANGE:** In addition to regular annual interviews, employees have the opportunity to address various proposals, questions, initiatives or dilemmas they have at any time.
- **VIA EMAIL AND IT APPLICATION - INTRANET:** The right of workers to be informed is also exercised via email, and they can also give their opinions on various matters via the INTRANET.

The purpose of the described cooperation with employees is to ensure optimal operations for both the company and the workers, which is why the consensus of employees is sought in all decisions that concern them. The results of cooperation and consideration of opinions given by employees are reflected in balanced business decisions in various areas. The management coordinates with employees on the necessary organizational changes and informs them about major projects, the company's strategy and other current topics.

**CLIENTS, CUSTOMERS & SUPPLIERS**

We have organized long-term contractual cooperation with most of our clients, customers and suppliers, within which there is a dialogue regarding orders, needs, demand, quality, characteristics of services, etc. Cooperation with customers and suppliers takes place on a daily basis, through meetings, telephone conversations and e-mails. Meetings with customers are held on an annual basis, especially in terms of presenting customer needs for new services, products and solutions, optimizing and improving their processes and business compliance. Every year, the Unija ETL Group also organizes a wider gathering of customers (New Year’s breakfast, Unija Days, etc.).

The purpose of this cooperation is to meet the needs of customers and suppliers, which is one of the fundamental guidelines of our business. For this reason, we try to take all their comments into account as much as possible. We are aware that both customers and suppliers are a key link in our value chain, which is why they are essential for the long-term operation of the Unija ETL Group.

**LOCAL COMMUNITY**

We adapt our operations at all our locations to the local environment in which we operate. As much as possible, we try to reduce the negative impacts we have on the outside (CO2 emissions, transport of employees), while at the same time promoting positive impacts such as employment from the local environment, financial donations, community support, etc.

We pay great attention to dialogue with the local community. This takes place through regular informal meetings of our management with members of the local community. In addition, in order to maintain an active dialogue with the local community, we often organize open days and the opportunity to see our company. We also undertake various charity campaigns in our environment, in which our employees participate. For example, we organized a day spent in a retirement home for our employees and a day spent with children with special needs (e.g. a charity run with them, we were present as volunteers and sponsors at events), our employees repainted the school playground in our municipality, we carried out a tree planting campaign, etc.).

Every proposal we receive from the local community is considered by the management of the Unija ETL Group and tries to take it into account as much as possible. Most of the dilemmas or questions of the local community relate to the impact of the company on the lives of people in the vicinity and the possible participation of the company in social activities and projects (co-financing of fire brigades, sports and culture).

We encourage the local community to actively contact our company if they detect certain problems. The management also has an „always open door“ for our neighbours, and their suggestions are welcome, as they allow us to improve our business and relationship with the local community.

**FINANCIAL INSTITUTIONS - BANKS**

Banks represent a group of our key stakeholders who support us in the implementation of all our investment projects and ongoing operations. Due to the need for continuous development and technological progress, the financial support of partners from the banking sector is essential for us. We are in regular contact with banks, and at the same time we inform them quarterly about all aspects of our business, financial results and the progress of joint projects. On an annual basis, we also report to banks on the area of sustainability, in the form of filling out structured questionnaires that banks use to address their partners. We also keep them informed about the progress of our major investments and the long-term operations of the company.

**5.2 STAKEHOLDER DIALOGUE**

As part of the dialogue with them, we also asked key groups of our stakeholders about ESG topics and asked them about impacts, risks and opportunities. Their responses were evaluated and taken into account in the final assessment of the double importance analysis.

# IX. SBM-3 SIGNIFICANT IMPACTS, RISKS AND OPPORTUNITIES AND THEIR RELATIONSHIP WITH STRATEGY AND BUSINESS MODELS

On the basis of the Double Materiality Assessment procedure (the implementation of the procedure is described in more detail in the next chapter of IRO-1), the Unija ETL Group identified the following of its significant impacts, risks and opportunities. Each is accompanied by a related sustainability issue or theme, subtopic or subtopic from the ESRS 1, AR. 16.

**Table 2 - SIGNIFICANT IMPACTS (POS\* positive, NEG\* negative) and RELATED IMPORTANT SUSTAINABILITY TOPICS**

	<b>IMPORTANT IMPACTS</b>	<b>ESG THEME</b>
1	POZ: All employees or candidates are offered an indefinite contract at the time of their first employment.	S1 Own labour force
2	POZ: Channels and mechanisms for the implementation of two-way communication between management and employees	S1-8 Coverage of collective bargaining and social dialogue
3	POZ: Employee-friendly working conditions that enable work-life balance	S1-15 Work-life balance metrics
4	POZ: Programs aimed at training and career development of employees	S1-13 Metrics of training and skills development
5	NEG: Greenhouse gas emissions	E1 Climate change
6	POZ: Various measures to promote corporate culture and corporate affiliation	G1 Business Conduct – Corporate Culture
7	POZ: mechanisms in place to report possible irregularities and protect whistleblowers	G1-1 Business Conduct

A more detailed description and other required disclosures regarding significant effects are formulated together with the disclosures for each thematic standard, in accordance with the ESRS 2, paragraph 49.

**Table 3** - SIGNIFICANT RISKS and OPPORTUNITIES and RELATED IMPORTANT SUSTAINABILITY TOPICS

	SIGNIFICANT RISKS AND OPPORTUNITIES	ESG THEME
1	RISK: Possible excessive staff turnover	S1 Own labour force
2	RISK: Difficulties in securing a sufficiently large number of quality staff	S1 Own labour force
3	OPPORTUNITY: Successfully ensuring the security of customer and end-user data	S4 Consumers and end-users
	RISK: Cybersecurity	G1 Business conduct

The more detailed description and other required disclosures regarding material risks and opportunities are formulated together with the disclosures for individual thematic standards in accordance with ESRS 2, paragraph 49.

At this point, we would like to point out that in the course of the process, we identified (and assessed as important) the following opportunity, which is in fact of double importance for the company: »Successfully ensuring the security of customer and end user data. On the one hand, the security of customer and end-user data poses a risk to the company. On the other hand, investing, investments, and developing technologies and protocols to ensure data security give the company a significant advantage over its competitors. Thanks to the use of the best technologies, the ETL Group has been offering products on the market for many years that provide safety and reliability to consumers, while not having a negative impact on the user experience due to ease of use.

# X. IRO-1 DESCRIPTION OF PROCEDURES FOR IDENTIFYING AND ASSESSING SIGNIFICANT IMPACTS, RISKS AND OPPORTUNITIES

## 6. GENERAL

In order to determine our significant impacts, risks and opportunities, we at Unija ETL Group have carried out the **Double Importance Assessment process**. Dual importance has two dimensions, namely the significance of the impacts and the financial importance.

**A sustainability matter is considered material from an impact perspective** if it concerns the actual or potential significant positive or negative impacts of the company on people or the environment, in the short, medium, or long term. These impacts include those arising from the company's own operations as well as from its upstream and downstream value chain, including its products and services and its business relationships. Business relationships encompass entities within the company's value chain, both upstream and downstream, and are not limited to direct contractual relationships.

**A sustainability matter is important from a financial point of view** if it causes significant financial impacts on an undertaking or can reasonably be expected to cause them. This shall be the case if, as a result of a sustainability matter, risks or opportunities arise which have a material impact or which can reasonably be expected to have a material impact on:

- company development
- its financial situation;
- financial performance,
- cash flows,
- access to finance, or
- the cost of capital;

in the short, medium or long term.

## 7. PROCEDURE PERFORMED

The first step in the implementation of the process was the formation of a sustainability team, which we composed of 4 internal experts from different fields such as human resources, information security, finance, procurement and sales. We supplemented the team with external experts and thus provided the widest possible knowledge necessary for the preparation of the report in question. The process took place from January to the end of May 2025, in the form of workshops, meetings of the entire team, research work, consultations by individual areas, consultations with other internal departments, analyses, preparation, verification of results, surveys and dialogue with stakeholders, etc. Below we reveal in more detail the individual steps of the process.

## 7.1 LONG LISTS OF IMPACTS, RISKS AND OPPORTUNITIES

To determine materiality, we initially relied on the list of sustainability matters outlined in ESRS 1, Appendix C (AR 16). The Sustainability team first analysed each topic, subtopic and sub-subtopic from AR 16 to identify potential impacts, risks and opportunities relevant to the undertaking.

This assessment included both external impacts on people or the environment resulting from the company's own operations as well as from its upstream and downstream value chain.

Given that the Unija ETL Group is composed of several companies in several countries, in accordance with ESRS 1, paragraph 3.7 (Level of breakdown), information regarding the level of breakdown of impacts, risks and opportunities is provided for all locations. Insofar as individual IROs do not relate to the entire Group, but only to a separate company, individual location or asset, it is expressly stipulated that the information regarding this IRO relates only to such significant place or asset.

We further divided the impacts into positive and negative, and classified them according to the actual impacts that already exist and any impacts that may yet arise in the future. In addition, we classified all impacts according to their duration, either short-term (1 year - reporting period), medium-term (duration up to 5 years) or long-term (duration over 5 years).

On the other hand, we have identified risks and opportunities that have significant financial effects on the company, or can reasonably be expected to cause. These have been distinguished according to their origin, namely those that originate from the negative influences of the company from the outside and those that arise from the possible dependence of society on natural, human or social resources. We have also divided the risks and opportunity according to their duration, taking into account the time periods mentioned above.

In this way, we obtained the so-called „long list“ of approximately 30 impacts, risks and opportunities, which we further assessed in accordance with the requirements of the ESRS standards.

## 7.2 ASSESSMENT OF THE SIGNIFICANCE OF IMPACTS

In the next step, the sustainability team **assessed the significance of impacts from a long list**, in accordance with the criteria prescribed by the ESRS standards.

The criteria used vary depending on whether the impact assessed is negative or positive, and whether it is an actual or potential impact. The criteria are shown in the following Table No. 4.

**Table 4** – Impact assessment criteria

INFLUENCE	POSITIVE	NEGATIVE
<b>Actual</b>	<ul style="list-style-type: none"> <li>• SEVERITY</li> <li>– Extension</li> <li>– Circumference</li> </ul>	<ul style="list-style-type: none"> <li>• SEVERITY</li> <li>– Extension</li> <li>– Circumference</li> <li>– Irreversibility of the character of influence</li> </ul>
<b>Possible</b>	<ul style="list-style-type: none"> <li>• SEVERITY</li> <li>– Extension</li> <li>– Circumference</li> </ul> <ul style="list-style-type: none"> <li>• PROBABILITY</li> </ul>	<ul style="list-style-type: none"> <li>• SEVERITY</li> <li>– Extension</li> <li>– Circumference</li> <li>– Irreversibility of the character of influence</li> </ul> <ul style="list-style-type: none"> <li>• PROBABILITY</li> </ul>

The **SEVERITY** depends on the following factors:

- a. **the dimension**, i.e. how severe the negative impact is or how beneficial the positive impact is for people or the environment;
- b. **scope**, i.e. how widespread the negative or positive impacts are. In the case of environmental impacts, scale can be understood as the extent of environmental damage or geographical scope. In the case of human impacts, the extent can be understood as the number of people affected by the negative impacts, and
- c. **irreversible in nature**, i.e. whether and to what extent remedial action can be taken to address the negative impacts, i.e. to restore the environment or the people affected to their previous state.

Each of the above criteria was evaluated on a scale from 1 to 5, with a score of 1 being the lowest value and a score of 5 being the highest. Each of the assessments provided takes into account qualitative and quantitative indicators, including sectoral guidance and data, as well as pre-existing due diligence results (the relationship between the double materiality analysis process and the results of the due diligence already carried out is further explained in Chapter 7.4. Where possible, the team used objectively verifiable criteria when providing estimates. In some cases, the use of objectively verifiable criteria in the assessment was not possible (in particular, this is the case for certain impacts, risks and opportunities from social (S) work), as these are areas that are not measurable. In such cases, a subjective assessment by an expert in a particular field was used, supplemented by the opinion of other members of the sustainability team and verified in consultation with other experts within the company who were not part of the sustainability team.

In our assessment, we took into account the principle that in the event of a potential negative impact on human rights, the severity of the impact takes precedence over its probability.

## 7.3 FINANCIAL IMPORTANCE

The assessment of the significance of the impacts was followed by an assessment of financial materiality. Here, too, the risks and opportunities from the long list were assessed in accordance with the criteria prescribed by the ESRS standards, based on a combination of the likelihood of financial effects occurring and their potential magnitude.

When assessing the potential financial extent of risks and opportunities, we took the potential impact on the company's EBITDA as a criterion and classified them into categories or set thresholds. The thresholds were set on the basis of an existing assessment (of business risks) and adapted to the company's current operations, business model and financial conditions.

The probability of occurrence was estimated in %, where 100% meant the certain realization of the event (risk or opportunity). The above-mentioned information (nature, extent and likelihood of risks) for the Unija ETL Group constitutes data of a sensitive nature, which is why, in accordance with ESRS 1, section 7.7, we exercise the possibility to omit specific information relating to sensitive information or trade secrets.

## 7.4 DUE DILIGENCE

In the Unija ETL Group, we have so far carried out only a partial, but not a comprehensive sustainability due diligence process (in the international instruments listed below, referred to as »due diligence«) as defined by the ESRS standards:

*»Due diligence is the process by which companies identify, prevent and mitigate actual and potential negative impacts on the environment and people associated with their operations, and explain how they address these impacts. These impacts include negative impacts that are related to the company's own activities and upstream and downstream of its value chain, including through its products or services and business relationships. Due diligence is an ongoing practice that adapts to or can trigger changes in a company's strategy, business model, activities, business relationships, operations, acquisition and sale. This process is described in the international instruments of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.«<sup>1</sup>*

Despite the fact that **we have not yet carried out a comprehensive sustainability due diligence process** in the company, we have been **implementing partial procedures in various areas for a long time**, each of which has a similar role, content or significance for our business in its own field.

For a long time, we have implemented the following procedures, which are intended to manage the various impacts of society on people and the environment.

**Table 5** – (partial) due diligence procedures and consideration of their results in the DMA process

Name of the procedure for managing the impact on humans or the environment	Content	Related esg topic
ISO 9001	Quality management system	G part
ISO 27001	Information Security Management System	G and S4 consumers and end-users
ISU 001 Basic Rules	The basis of the rule, the values of the Group	G1, S1, corporate culture
ISU 002 Security policy for employees	Rules on the safe handling of data for employees	G and S4 consumers and end-users
ISU 003 Absence	Justified absences from work	S1-15
ISU 007 Work from home	Conditions for working from home	S1-15
ISU 009 Employee promotion	Training and promotion of employees	S1-13
ISU 011 Meeting Culture	Edit internal and external meetings	S1-15
ISU BO-02 Recruitment	Recruiting and on-boarding employees	S1
ISU BO-03 Employee Introduction	Introducing employees to the work process	S1
ISU BO-11 Survey	Employee surveys	S1-8, S1-2, G
ISU BO-12 Employee engagement officer	Care for employees through an EEE administrator	S1-2, S1-8, G
ISU ITS-01 Security policy for IT support	Cybersecurity, data protection	S4, G

<sup>1</sup> See ESRS 1, paragraph 59.

All of the above procedures partially address the different areas of sustainability and contain all or at least some of the elements that the ESRS standards foresee for comprehensive sustainability due diligence:

- connection with the management, strategy and business model of the company,
- engaging with affected stakeholders
- identification and assessment of negative impacts on people and the environment,
- taking action to address negative impacts on people and the environment
- monitoring the effectiveness of these efforts.

The standards stipulate that a company considers the outcome of its sustainability due diligence process when assessing its significant impacts, risks and opportunities. For this reason, **we used the already existing results of the above procedures to identify and internally evaluate the IROs**, of course, only in the areas where they were available.

## 7.5 STAKEHOLDER INVOLVEMENT IN THE DOUBLE IMPORTANCE ASSESSMENT PROCESS

The Unija ETL Group engagement with stakeholders took place informally in the first year of the sustainability statement in the context of a regular dialogue with them. This is described in more detail in Chapter 5.1 – Identification of stakeholders. The opinion of stakeholders is taken into account in the internal assessments provided by the sustainability team.

In the coming years, we intend to broaden and deepen our cooperation with sustainability stakeholders and re-engage them in the double importance analysis process.

## 7.6 SIGNIFICANT IMPACTS OR RISKS ARISING FROM MEASURES TO ADDRESS SUSTAINABILITY MATTERS

In business practice, a situation may arise where an undertaking's actions to address certain impacts, or risks, or to exploit certain opportunities related to a sustainability matter, may have significant adverse impacts or give rise to significant risks in relation to one or more other sustainability matters.

So far, we have not detected such significant impacts or risks arising from measures to address sustainability matters in the Unija ETL Group. However, we anticipate that such situations could arise in the future, in particular in the context of the implementation of the decarbonisation action plan. To this end, we will closely monitor the implementation and implications of sustainability measures in the future and, if necessary, identify and address significant risks and opportunities that they would cause.

## 8. JOINT ASSESSMENT OF IMPACTS, RISKS AND OPPORTUNITIES

Given that we have involved the affected stakeholders in the double materiality analysis process in the context of an informal dialogue, their views on individual IROs are taken into account in the internal assessments of the Sustainability Team, and the overall assessments are consequently the same as the internal assessments.

### 8.1 SIGNIFICANT IMPACTS

Significant impacts of the Unija ETL Group are those where **the final overall score is 3.5 or higher**.

### 8.2 SIGNIFICANT RISKS AND OPPORTUNITIES

The material risks and opportunities of the Unija ETL Group have been determined on the basis of an assessment of financial materiality. As explained above, financial materiality information (including thresholds and the likelihood of occurrence and the potential magnitude of risks and opportunities) constitute a trade secret and are therefore not disclosed under the ESRS 1, Section 7.7.

## XI. IRO-2 – ESRS DISCLOSURE REQUIREMENTS COVERED BY THE COMPANY'S SUSTAINABILITY STATEMENT

In the preparation of the sustainability statement, the disclosure requirements resulting from the following Table 6 have been included in the preparation of the sustainability statement.

**Table 6** – Disclosure requirements

Sustainable theme	Group of disclosure requirements
General basis for the preparation	BP-1
Disclosures relating to special circumstances	BP-2
Role of administrative, management and supervisory bodies	GOV-1
Information submitted to the administrative, management and supervisory bodies of the undertaking and the sustainability matters dealt with by those bodies	GOV-2
Due diligence statement	GOV-4
Risk management and internal controls of sustainability reporting	GOV-5
Strategy, business model and value chain	SBM-1
Interests and views of stakeholders	SBM-2
Significant impacts, risks and opportunities and their relationship to strategy and business model	SBM-3
Description of the procedures for identifying and assessing significant impacts, risks and opportunities	IRO-1
Disclosure requirements from the ESRS covered by the company's sustainability statement	IRO-2
Policies relating to their own workforce	S1-1
Procedures for cooperation with own workers and workers' representatives in relation to impacts	S1-2
Procedures for remedial action in relation to adverse impacts and channels through which own workers can raise concerns	S1-3
Taking measures in relation to material impacts on own labour force and approaches to mitigating material risks and seizing significant opportunities in relation to own labour and the effectiveness of those measures	S1-4

Sustainable theme	Group of disclosure requirements
Objectives relating to the management of material adverse impacts, the promotion of positive impacts and the management of material risks and opportunities	S1-5
Characteristics of employees of the company	S1-6
Characteristics of workers unemployed in their own labour force	S1-7
Collective bargaining coverage and social dialogue	S1-8
Training and skills development metrics	S1-13
Work-life balance metrics	S1-15
Consumer and end-user policies	S4-1
Procedures for remedial action in relation to adverse impacts and channels through which consumers and end-users can raise concerns	S4-3
Taking measures in relation to material impacts on consumers and end-users and approaches to managing material risks and exploiting significant opportunities in relation to consumers and end-users, and the effectiveness of those measures	S4-4
Objectives relating to the management of material adverse impacts, the promotion of positive impacts and the management of material risks and opportunities	S4-5
Business conduct policies and corporate culture	G1-1
Corporate culture and policies on business conduct	G1-1

At the Unija ETL Group, we do not have disclosure requirements arising from other EU legislation (ESRS 1 Appendix B).

## XII. COMPANY - ESRS S1 - OWN LABOUR

### 9. ESRS 2 SBM-2 – STAKEHOLDERS' INTERESTS AND VIEWS

Employees are a key factor in the success of any company, as they represent its greatest value and the foundation for growth and development. Active cooperation of the company with employees enables the creation of a healthy and supportive environment, which increases their satisfaction, motivation and, consequently, productivity. Employees bring knowledge, experience and innovative ideas that are crucial for the development of products, services and business processes. With motivated and satisfied employees, the company achieves better results, improves quality and builds a positive reputation in the market.

At Unija ETL Group, we recognize our employees not only as a key group of affected stakeholders, but as our strategic partners. As a result, we are constantly improving our strategy and business model in such a way that we take into account the interests, views and rights of persons in our own workforce (including respect for their human rights) to the greatest extent possible. To this end, we cooperate with our own employees in all major business decisions, co-create the working environment and working conditions with them, and promote open communication, compassion and mutual respect. This includes promoting well-being, providing support for professional development, adapting work tasks and ensuring a work-life balance. Our experience has shown that such an approach benefits not only the individual, but the entire organization, as a healthy and positive work environment reduces stress, illness and absences, while strengthening team spirit and belonging to the company, which is the basis of sustainable business and joint success.

### 10. ESRS 2 SBM-3 – SIGNIFICANT IMPACTS, RISKS AND OPPORTUNITIES AND THEIR RELATIONSHIP TO STRATEGY AND BUSINESS MODEL

In the Unija ETL Group, we have identified significant impacts, risks and opportunities related to our own workforce, as outlined in Table 7 below. The disclosures in this sustainability statement include all persons in the company's own workforce who could be significantly affected by the Unija ETL Group. These significant impacts include those related to the company's own activities and value chain, including through our products or services and through our business relationships.

Below is a description of how significant impacts on the company's own workforce arise from or are taken into account in the company's strategy and business model and contribute to their adaptation. In addition, for each material risk, the relationship between the material risks arising from impacts on and dependencies on its own workforce and the strategy and business model of the Unija ETL Group shall be disclosed.

**Tabela 7** – Significant impacts, risks and opportunities in the area of Own Labour

IMPORTANT IROs		ESG THEME	
1	All employees or candidates are offered a contract for an indefinite period of time when they are hired for the first time.	POSITIVE IMPACT	S1 Own labour force
2	Channels and mechanisms for implementing two-way communication between management and employees	POSITIVE IMPACT	S1-8 Coverage of collective bargaining and social dialogue
3	Employee-friendly working conditions that enable work-life balance	POSITIVE IMPACT	S1-15 Work-life balance metrics
4	Programs aimed at training and career development of employees	POSITIVE IMPACT	S1-13 Metrics of training and skills development
5	Possible excessive staff turnover	RISK	S1 Own labour force
6	Difficulties in securing a sufficiently large number of quality staff	RISK	S1 Own labour force

**ALL EMPLOYEES OR CANDIDATES ARE OFFERED AN INDEFINITE CONTRACT WHEN THEY ARE HIRED FOR THE FIRST TIME.**

This is a positive, long-term impact that comes from the Unija ETL Group's own activities. The informally established policy or strategy of the company is that all new employees are offered employment for an indefinite period of time (with a probationary period) upon arrival at the company. Such established job security brings career and financial stability to employees, and at the same time, by eliminating the element of uncertainty, it can also have a positive impact on private life. At the same time, it enables employees to integrate faster into the work environment and the team of colleagues.

**CHANNELS AND MECHANISMS FOR IMPLEMENTING TWO-WAY COMMUNICATION BETWEEN MANAGEMENT AND EMPLOYEES**

This is a positive, long-term impact that comes from the Unija ETL Group's own activities. In the Unija ETL Group, we have established the following channels and mechanisms to promote two-way communication: active promotion by management, posters in the workspaces, annual and monthly interviews with employees, e-mail addresses for receiving ideas/proposals, promotion of a culture of communication, education, open door policy. Employee satisfaction surveys, the operation of the employee administrator (EEO). The Company's cooperation with employees and two-way communication are described in more detail under Chapter No. 5.1 Identification of Stakeholders.

**EMPLOYEE-FRIENDLY WORKING CONDITIONS THAT ENABLE WORK-LIFE BALANCE**

This is a positive, long-term impact that comes from the Unija ETL Group's own activities. The Unija ETL Group strives to create a working environment that allows employees to effectively balance work and private life. Coordination is carried out through the implementation of a wide range of diverse measures, which are described in more detail below. Through the system of measures and mechanisms available to our employees, we in the Unija ETL Group establish a work culture that values free time, employee well-being and a healthy work-life balance.

**PROGRAMS AIMED AT TRAINING AND CAREER DEVELOPMENT OF EMPLOYEES**

This is a positive, long-term impact that comes from the Unija ETL Group's own activities. We care about the training and career development of our employees, because we believe that their knowledge, commitment and satisfaction are key to our joint success. By investing in education, mentoring and development paths, we enable professional growth, promote motivation and build an

environment in which each individual can develop and contribute to the best of their ability. Training is provided in the professional fields relevant to the activities of the Unija ETL Group, as well as on topics related to cyber and information security and soft skills.

**APPROPRIATE STAFF TURNOVER**

This is a long-term risk stemming from the Unija ETL Group's own activities and its dependence on human resources. We are aware that staff turnover occurs for various reasons, which may be related to the organization or the individual. We understand that staff turnover is also a necessary phenomenon in every organization to a certain extent, as it brings fresh ideas and new perspectives. A healthy turnover rate promotes development, flexibility and strengthens the company's competitiveness in the long term. We have set criteria for planned and acceptable fluctuation. We meet the criteria every year. Excessive staff turnover could have negative consequences for the working climate, efficiency and costs of the company. In addition, a large part of the services we offer are based on a personal relationship and trust between the client and the caregiver in charge of them. Excessive staff turnover could also have a negative impact on built trust and customer relationships. For this reason, we manage the described risk by regularly taking care of employee satisfaction with favourable working conditions, various opportunities for promotion or development, establishing good relationships in teams (internal events, training, including communication), appropriate management, appropriate salaries and a reward system. This and other measures (education, integration, etc.) ensure that there is no excessive fluctuation.

**DIFFICULTIES IN ENSURING A SUFFICIENTLY LARGE NUMBER OF QUALITY PERSONNEL**

This is a long-term risk stemming from the Unija ETL Group's own activities and its dependence on human resources. The Unija ETL Group, like most Slovenian, and more broadly – European companies, is facing a lack of a sufficient number of appropriately qualified and high-quality staff. For this reason, we have introduced a number of instruments into our business model that allow us to successfully avoid this risk. We have implemented a clear HR strategy that includes attractive employment conditions, competitive remuneration, opportunities for development and advancement (Unija Academy, HR training program) and a stimulating working environment. A strong employer brand also plays a key role, presenting the company as a desirable workplace. In addition, the Unija ETL Group uses various channels to find staff, such as job portals, social networks, cooperation with educational institutions and recommendations from existing employees. An efficient and fast selection process and a positive attitude towards candidates further increase the chances of recruiting the right staff.

The above disclosures include and apply to all persons in its own workforce who could be significantly affected by the Unija ETL Group. The significant impacts described include impacts that are related to the company's own activities and value chain, including through our products or services and through our business relationships.

**The Unija ETL Group's own workforce consists exclusively of employees** (mostly employment relationships for indefinite hours), as the **Unija ETL Group does not have self-employed persons or persons provided by third companies that mainly perform employment activities** (so-called agency workers).

In the double importance assessment process, **we did not detect any negative or potential negative impacts on our own workforce.** The **positive impacts described above apply to all persons in the Unija ETL Group's own workforce, regardless of the type of employees** (department, sector), or **the country or region from which they come.** The significant risks described above **relate to all persons in their own workforce and not to specific groups of persons.**

In the dual importance assessment process, we did not identify any significant impacts on our own workforce resulting from transition plans to reduce negative environmental impacts and ensure greener and climate-neutral activities. At Unija ETL Group, we do not operate in countries (geographical areas) or engage in activities where there is a high risk of forced labor incidents or child labor incidents.

## 11. S1-1 – POLICIES, S1-2 – PROCEDURES FOR COOPERATION, S1-4 – MEASURES AND S1-5 OBJECTIVES

The following **are collectively made disclosures in accordance with:**

- S1-1 (Policies relating to own labour),
- S1-2 (Policies relating to own labour),
- S1-4 (Taking measures in relation to material impacts on own workforce and approaches to mitigating material risks and seizing significant opportunities in relation to own workforce and the effectiveness of those measures) and
- S1-5 – Objectives related to the management of significant impacts, the promotion of positive impacts, and risks and opportunities

**and separately for each identified significant influence separately.**

### 11.1 TO ALL EMPLOYEES, CANDIDATES ARE OFFERED A PERMANENT CONTRACT WHEN THEY ARE HIRED FOR THE FIRST TIME

#### POLITICS (S1-1)

The management of this impact is regulated by the Unija ETL Group in the internal ISU BO-02 Recruitment standard. The rule that each new employee receives a contract for an indefinite period of time (in which a probationary period is specified) is not formally regulated in any internal act, but this rule is part of the company's informal strategy, or rather its general policy and culture. Given the planned growth of the business, a plan for hiring new employees is also prepared. All new employment contracts are concluded for an indefinite period. The process of finding and recruiting new employees is regulated.

#### PROCEDURES FOR COOPERATION WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES IN RELATION TO IMPACTS (S1-2))

In connection with this positive impact, the Unija Group cooperates with its own workforce within the framework of the implementation of the »on-boarding« process (which is regulated in more detail in the internal standard ISU BO-03 Employees Introduction) and two-way communication mechanisms (the mechanism of two-way communication is described in more detail under Chapter No. 5.1 Definition of stakeholders).

This rule is explained to each new employee directly at the initial stage before signing the employment contract, and at the same time they are also familiar with the institute of the probationary period, their rights and obligations and the conditions for successful completion of the period. The function and the highest position in the company with operational responsibility for ensuring that the above cooperation is implemented and that its results are taken into account in the approach of the company is the head of the personnel department.

#### MEASURES (S1-4)

Each new employee receives a contract for an indefinite period of time (in which a probationary period is specified) to sign. In 2024, 79 open-ended contracts were concluded in the Unija ETL Group.

The long-standing strategy of the Unija ETL Group is to include care for human resources in its mission and vision and to strengthen the company's relationship with its employees. For many years, management has been making various strategic decisions to put its employees first and strives for their satisfaction and that they feel good at work. Ensuring job security through open-ended contracts is only one of a set of measures aimed at achieving employee satisfaction, the second will be presented below.

Since the present case is a measure whose results are not actually measurable, the Unija ETL Group does not monitor and assess its effectiveness. Indirectly, the effectiveness of this measure is measured by measuring employee satisfaction (surveys), but many other factors contribute to employee satisfaction, which is why the (in)effectiveness of the measure in question cannot be discussed separately from the others.

#### OBJECTIVES (S1-5))

The company has not set measurable quantitative targets in relation to this impact and the measures it takes to ensure significant positive impacts for its own workforce in the manner described above. The primary goal of the Unija ETL Group is to provide all its employees with job security and through this to indirectly ensure their satisfaction and thus facilitate the acquisition, retention and development of quality staff. The Company works closely with employees to determine, monitor performance and identify possible improvements in achieving the described goal, through mechanisms and channels of two-way communication, which will be presented in detail below.

### 11.2 CHANNELS AND MECHANISMS FOR IMPLEMENTING TWO-WAY COMMUNICATION BETWEEN MANAGEMENT AND EMPLOYEES

#### POLITICS (S1-1))

To manage this impact, the Unija ETL Group has adopted the following policies in the form of internal group standards (so-called »ISUs«) and developed various programmes:

- **ISU 001 Basic Rules Annex to the Values of the Group.** The standard sets out the values of the Unija ETL Group, and its goal is to achieve compliance with these values among employees, including internal communication.
- **ISU BO-11 Survey.** The standard involves the timely conduct of various surveys among employees, the aim of which is to obtain clear assessments of past work, the course of communications, as well as recommendations for improving work performance and the introduction of innovations:
  - Participation survey - the goal of the survey is to obtain an anonymous assessment - information from employees about work, superiors, working conditions, etc. Employees can offer ideas for improvements, as well as positive and negative criticisms, on the basis of which solutions could be introduced.
  - Survey - Satisfaction with departments within the company - the purpose of the survey is to check the work of internal departments of the company.
  - 360° survey - with this survey, employees rate co-workers, superiors and themselves.
- **ISU BO-12 Employee Engagement Officer.** The purpose of the role of EEO in the Unija ETL Group is to maintain good relations between employees through various activities, to promote open and respectful communication, and to provide support in introducing changes and realizing the company's values. The role of the EEO is established within each country. A detailed description of the tasks, activities and activities of the EEO is given under Chapter No. 5.1 - Identification of stakeholders.

All of the above policies apply at the level of the entire Unija ETL Group and therefore apply to its entire own workforce.

The highest level in the organization of the company that is responsible for the implementation of these policies is the Management (CEO and MD, BD, BM, TL, PL). In the formulation of all the described policies, the interest of employees as key stakeholders was primarily taken into account, as all of them were adopted with the aim of improving working conditions, ensuring workers' rights and establishing an employee-friendly working environment. The policies are available to employees and policy implementers on the intranet page of the Unija ETL Group.

### **PROCEDURES FOR COOPERATION WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES IN RELATION TO IMPACTS (S1-2)**

By their very nature, the channels and mechanisms of two-way communication between the Unija ETL Group and its employees represent a general procedure for cooperation with its own workforce regarding all impacts, risks and opportunities in the field of sustainability, as well as all other matters relating to the Group's operations.

This cooperation always takes place directly with the employees themselves. The function and the highest position in the company with the responsibility to ensure that two-way communication is carried out and that its results are taken into account in the approach of the company is Management and EEO.

#### **MEASURES (S1-4)**

In order to ensure positive impacts for its own workforce, the Unija ETL Group implements the following measures to promote two-way communication: promotion by management, posters in the workplaces, annual and monthly interviews with employees, e-mail addresses for receiving ideas/proposals, promotion of a culture of communication, education, open door policy, employee satisfaction surveys, 360 survey, cooperation survey, survey - satisfaction with departments within the company, the functioning of the EEO-SZZ department (Employee Engagement Officer), the implementation of individual and group colleges and workshops where measures are taken on the operations of the Group, voting on proposals, measures taken to prevent mobbing and the protection of whistleblowers, and many others.

The measures apply to all employees in the Unija ETL Group and take place regularly – practically every day throughout the financial year. Every year, the management, together with the HR department and with the participation of employees, analyses the set, scope, implementation and effects of the implemented measures and, if necessary, supplements and adjusts them. In this area too, the effects of the measures implemented are not quantitative in nature, which makes them difficult to measure. The Unija ETL Group examines the effects indirectly by conducting employee satisfaction surveys.

#### **OBJECTIVES (S1-5)**

The goal of promoting two-way communication in the company is to establish an open and collaborative environment where information flows between management and employees in both directions. This increases employee engagement, trust and motivation.

The Unija ETL Group constantly cooperates with employees who co-create goals and the set and method of implementation of measures at colleges and workshops. By conducting satisfaction surveys, the management monitors the company's performance in relation to the goals and then, together with the employees, defines any findings or improvements that need to be implemented in the coming period.

### **11.3 EMPLOYEE-FRIENDLY WORKING CONDITIONS THAT ENABLE WORK-LIFE BALANCE**

#### **POLITICS (S1-1)**

To manage this impact, the Unija ETL Group has adopted the following policies in the form of internal Group standards (so-called »ISU«) and developed various programmes:

- **ISU 003 Absence.** The standard regulates the conditions and reasons for justified absence from work and the related rights and obligations of employees (annual leave, sick leave, maternity leave, unpaid leave, absence during the working day. The goal is to ensure the smooth flow of work processes in the event of employee absences.
- **ISU 007 Work from home.** The standard introduces different models of employee work (classic and hybrid). It determines the working conditions, the mode of work, and the number of days of working from home in each model. The aim of the standard is to achieve employee satisfaction, prevent turnover (employee retention) and attract potential new employees.
- **ISU 008 Employee rules & benefits.** The standard sets out the rules and conditions under which employees are entitled to certain bonuses, such as annual bonuses, annual rewards, remote work bonuses, jubilee awards, additional days off, gifts and attentions when returning after a long absence, New Year's event with Dedek Mraz, health promotion measures, bonuses upon acquiring a new customer and recommending a new employee, etc.
- **ISU 011 Meetings Culture (non-meeting time to facilitate work coordination).** Among other things, the standard also specifies a period of »non-meeting time« (Mon-Thu 2-4 p.m. and Friday all day) during which employees are not supposed to convene meetings, in order to facilitate coordination and performance of work.

Vse navedene politike se uporabljajo na ravni celotne Skupine Unija ETL in se nanašajo na celotno lastno delovno silo.

Najvišja raven v organizaciji podjetja, ki je odgovorna za izvajanje teh politik je Poslovodstvo, medtem ko so za njihovo izvajanje odgovorni tudi vsi zaposleni v Skupini Unija ETL. Pri oblikovanju vseh opisanih politik je bil v prvi vrsti upoštevan interes zaposlenih kot ključnih deležnikov, saj so bile vse sprejete z namenom vzpostavitve zaposlenim prijaznega delovnega okolja in omogočanja čim lažjega usklajevanja poklicnega in zasebnega življenja. Politike so zaposlenim in izvajalcem politik na voljo na intranetni strani Skupine Unija ETL.

#### **PROCEDURES FOR COOPERATION WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES IN RELATION TO IMPACTS (S1-2)**

The Unija ETL Group strives to constantly improve and perfect working conditions and make them as friendly as possible for its employees, thus enabling them to more easily reconcile their professional and private lives. To this end, it works closely with employees at all steps, who can contribute and co-shape their own working environment with proposals and ideas. Cooperation takes place directly with employees, mainly within the framework of two-way communication mechanisms and through the employment engagement officer. Employees suggest various improvements to the working environment, which the company tries to take into account and implement as much as possible.

The function and top position in the company with operational responsibility for ensuring that the above cooperation is implemented and that its results are taken into account in the company's approach is Management.

The Unija ETL Group evaluates the effectiveness of the described cooperation with its own workforce in terms of providing friendly working conditions through various satisfaction surveys.

**MEASURES (S1-4)**

The Unija ETL Group strives to create a working environment that allows employees to effectively balance work and private life. Coordination is carried out by introducing the following measures:

- flexible working hours,
- the possibility of working from home or hybrid work,
- part-time work on Fridays and before holidays,
- understanding in the event of special personal circumstances on the part of the employee,
- additional vacation days;
- childcare support;
- education on work-life balance;
- fostering a culture that values the leisure time and well-being of employees;
- Support leaders who respect employees' private time and promote a healthy work-life balance.

The Group's employees apply the described measures on a daily basis. Every year, the management, together with the HR department and with the participation of employees, analyses the set, scope, implementation and effects of the implemented measures and, if necessary, supplements and adjusts them. The Unija ETL Group examines the effects by conducting employee satisfaction surveys, which also assess employees' work-life balance.

**OBJECTIVES (S1-5)**

The aim of introducing work-life balance measures is to improve the well-being of employees, increase their satisfaction and productivity, reduce stress and encourage greater loyalty and retention of staff. Such measures contribute to the creation of a healthy and stimulating working environment, where employees can more easily reconcile their personal obligations with work, which benefits both the individual and the company in the long run.

By conducting satisfaction surveys, the management monitors the company's performance in relation to the goals and then, together with the employees, defines any findings or improvements that need to be implemented in the coming period

**11.4 PROGRAMS AIMED AT TRAINING AND CAREER DEVELOPMENT OF EMPLOYEES****POLITICS (S1-1)**

To manage this impact, the Unija ETL Group has adopted the following policies in the form of internal Group standards (so-called »ISUs«) and various programmes developed:

- **ISU 009 Employee promotion.** The standard introduces and defines the following: Proficiency Promotion System, Management Promotion System, Promotion Notification, Potential Personnel Program, Talent Program, Mentoring Program, and Succession Plan. The goal of the standard is for every employee to know the possibilities of career development and for at least 50% of employees to advance by at least 1 internal rank.
- **Appendix 3 - Promotion scheme.** The document is an annex to the ISU 009 standard and additionally introduces the system and progression scheme in more detail.
- **Unija Academy**
- **Program Potential Staff for Professionalism Development.** It is intended for people who have a high potential and motivation for professional advancement. It introduces the conditions for entry into the programme and the rights that go to participants (additional training and promotions, a small monthly cash allowance for time and projects outside working hours, etc.).

- **Talent program for future executives.** It is intended for people who have high potential and motivation for a managerial position. It introduces the conditions for entry into the program and the rights that go to participants (additional training in leadership skills, attendance at the monthly regional college of all persons in the »Talents« program, additional financial compensation, etc.).

All of these policies and programmes are applied at the level of the entire Unija ETL Group and therefore apply to its entire own workforce.

The highest level in the company's organization that is responsible for the implementation of these policies is the Management, while all employees of the Unija ETL Group are also responsible for their implementation. In the formulation of all the described policies, the interest of employees as key stakeholders was primarily taken into account, as all of them were adopted with the aim of enabling career development opportunities and additional training of employees. The policies are available to employees and policy implementers on the intranet page of the Unija ETL Group.

**PROCEDURES FOR COOPERATION WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES IN RELATION TO IMPACTS (S1-2)**

The Unija ETL Group pays great attention to the career development and additional training of its employees, who are involved in the design of the type and content of training and therefore play an active role in this. Every year, the Unija ETL Group prepares a plan of planned trainings, which is presented and coordinated with employees. Within the framework of two-way communication mechanisms (e.g. in the case of a regular, annual or monthly interview), each employee can make preliminary suggestions regarding planned training. On the other hand, in the Unija ETL Group, we encourage employees to be active during the training process itself and after its completion, where they can make suggestions and assess the course and content. In this way, we ensure that employees take an active role in their own career development and at the same time obtain valuable feedback from them.

The function and top position in the company with operational responsibility for ensuring that the above cooperation is implemented and that its results are taken into account in the company's approach is Management. However, operational responsibility for the implementation of cooperation is also assigned to the head of the personnel department.

As mentioned, the Unija ETL Group evaluates the effectiveness of the described cooperation in terms of the development of its own workforce through surveys, i.e. evaluations after the education or training has been carried out.

**MEASURES (S1-4)**

With the programs described above (Talent Program for Future Managers, Potential Staff Program for Professionalism Development, Unija Academy, ISU 009 Employee promotion, training, courses, etc.), we take care of the training and career development of our employees, because we believe that their knowledge, commitment and satisfaction are key to our joint success. By investing in education, mentoring and development paths, we enable professional growth, promote motivation and build an environment in which each individual can develop and contribute to the best of their ability.

The described measures take place throughout the year and involve the majority of employees, i.e. all those who are interested.

**OBJECTIVES (S1-5)**

In accordance with the internal policy of ISU 009 Employee promotion, the goal is set that during the financial year at least 50% of employees have been promoted by at least 1 internal rank. In the Unija ETL Group, we had over 50 different trainings planned and implemented in 2024. A total of 27 employees were enrolled in the Talent and Talent Potential programs. In the Unija ETL Group, we check the course, progress and fulfilment of the training plan on a quarterly basis.

## 11.5 STAFF TURNOVER

### POLITICS (S1-1)

To manage this risk, the Unija ETL Group has adopted the following policies in the form of internal Group standards (so-called »ISUs«) and various programmes developed:

- **ISU BO-12 Employee Engagement Officer.** The purpose of the role of EEO in the Unija ETL Group is, among other things, to ensure employee satisfaction through various activities and thus to preventively ensure that there is no excessive fluctuation. One of the goals of this standard is satisfied and engaged employees and employee retention. The Group's goal is to keep staff turnover in the organization at the planned level or lower.
- **ISU BO-11 Survey.** The standard includes the timely implementation of various employee surveys, the aim of which is, among other things, to determine the level of satisfaction (internal and external) with the aim of higher productivity and better working conditions, which in turn affects the reduction of staff turnover.
  - Participation survey - the goal of the survey is to obtain an anonymous assessment - information from employees about work, superiors, working conditions, etc. Employees can offer ideas for improvements, as well as positive and negative criticisms, on the basis of which solutions could be introduced.
  - Survey - Satisfaction with departments within the company - the purpose of the survey is to check the work of internal departments of the company.
  - 360° survey - with this survey, employees rate co-workers, superiors and themselves.
- **ISU 009 Employee promotion.** Among other things, the standard introduces and defines the following program - the Succession Plan. In this part, the objective of the standard is to ensure that, in the event of the departure of any of the employees, the possibility of unhindered continuation of the performance of his duties by appropriate succession and/or temporary assumption of his duties by his associates.
- **Succession planning program).** Each manager is responsible and accountable for the selection and development of their successors, ensuring the smooth operation of the company.

All of the above policies apply at the level of the entire Unija ETL Group and therefore apply to its entire own workforce. The exception is the ISU BO-12 Employee Engagement Officer, which is not valid in Serbia. The highest level in the organization of the company responsible for the implementation of these policies is the Management (CEO, MD, BD, BM, TL, PL) and EEO.

In the formulation of all the described policies, the interest of employees as key stakeholders was primarily taken into account, as all of them were adopted with the aim of ensuring employee satisfaction, which affects lower staff turnover. The ISU BO-12 Employee Engagement Officer and ISU BO-11 Survey standards are directly aimed at introducing various measures to prevent the occurrence of employee departure and turnover, while the ISU 009 Employee promotion standard and the Succession Planning Program, on the other hand, enable the Unija ETL Group to ensure the smooth running of work processes in a situation where employee departures occur. The policies are available to employees and policy implementers on the intranet page of the Unija ETL Group.

### MEASURES (S1-4)

The risk in question is managed in two ways, with two types of measures. The first type is intended to prevent turnover by regularly ensuring employee satisfaction with good working conditions, various opportunities for promotion or development, good relationships in teams (internal events, training, including communication), appropriate management, adequate salaries and a reward system. The-

se and other measures (education, inclusion, etc.) preventively ensure that there is no excessive fluctuation. The second set of measures we implement is aimed at reducing the consequences of turnover in a way that ensures the smooth running of work processes in a situation where employee departures occur (succession program, employee promotion, etc.).

The described measures take place throughout the year and involve all employees.

### OBJECTIVES (S1-5)

In the Unija ETL Group, the goal is to avoid excessive fluctuation, which could have negative consequences for the working climate, efficiency and costs of the company. We set ourselves the goal that the turnover in the organization is at the planned level or less, and the engagement is at the planned level or higher. In the event that there are departures of key employees, the goal is to have a succession plan in place that allows for a smooth workflow. In 2024, a turnover of 13% was planned.

The management monitors the turnover indicator on a quarterly basis and, in cooperation with employees, identifies the necessary improvements in terms of strategy and attitude towards its own workforce.

## 11.6 DIFFICULTIES IN SECURING A SUFFICIENTLY LARGE NUMBER OF QUALITY STAFF

### POLITICS (S1-1)

To manage this risk, the Unija ETL Group has adopted the following policies in the form of internal Group standards (so-called »ISUs«) and various programmes developed:

- **The ISU BO-02 Recruitment.** Standard describes the activities involved in recruiting new employees, from the moment of submitting a job application, selecting candidates, conducting interviews to the actual signing of the contract in all countries of the Unija ETL Group. It regulates the stages: from identifying the need for new staff, carrying out the procedure for finding a new employee, processing CVs, interviewing candidates, selecting candidates and signing the contract, notifying unselected candidates and evaluating the probationary period.
- **ISU 009 Employee promotion.** The standard introduces and defines the following: Proficiency Promotion System, Management Promotion System, Promotion Notification, Potential Personnel Program, Talent Program, Mentoring Program, and Succession Plan. The goal of the standard is for every employee to know the possibilities of career development and for at least 50% of employees to advance by at least 1 internal rank.
- **Unija Academy (education) for professional and personal development.**
- **Program Potential Staff for Professionalism Development.** It is intended for people who have a high potential and motivation for professional advancement. It introduces the conditions for entry into the programme and the rights that go to participants (additional training and promotions, a small monthly cash allowance for time and projects outside working hours, etc.).
- **Talent program for future executives.** It is intended for people who have high potential and motivation for a managerial position. It introduces the conditions for entry into the program and the rights that go to participants (additional training in leadership skills, attendance at the monthly regional college of all persons in the »Talents« program, additional financial compensation, etc.).

All of the above policies apply at the level of the entire Unija ETL Group and therefore apply to its entire own workforce. The highest level in the organization of the company that is responsible for the implementation of these policies is the Management.

In the formulation of the described policies, the interest of employees as key stakeholders was primarily taken into account. In dealing with the risk in question, the Unija ETL Group uses two different principles, namely the employment of quality personnel, which is the purpose of *the ISU BO-02 Recruitment standard*, and the building of its own staff through education, various opportunities for cooperation and inclusion, which is the purpose of the ISU 009 Employee promotion standard, and *the Unija Academy programs* for the personal »personal folder«, *The Potential Staff Programme for the Development of the Professionalism of Completed Trainings and the Talent Programme for Future Managers*.

The described policies are available to employees and policy implementers on the intranet page of the Unija ETL Group.

#### MEASURES (S1-4)

In the Unija ETL Group, we take care of reducing and managing the risk of a shortage of adequate staff through the following measures: Unija Academy, a staff training programme, a clear HR strategy that includes attractive employment conditions, competitive remuneration, opportunities for development and promotion, and a stimulating working environment. A strong employer brand also plays a key role, presenting the company as a desirable workplace. In addition, Unija ETL Group uses various channels to find staff, such as job portals, social networks, cooperation with educational institutions, and recommendations from existing employees. An efficient and fast selection process and a positive attitude towards candidates further increase the chances of recruiting the right staff.

The management, in cooperation with the heads of various levels, regularly monitors the work, efficiency and organisation of individual departments and subsidiaries in the Group in order to detect the need for additional staff or possible staff malnutrition in a timely manner, and to act as quickly as possible with the reorganisation, promotion or employment of additional employees.

#### OBJECTIVES (S1-5)

With the policies and measures for their implementation described above, we ensure the reduction of the risk in question and pursue the goal - easier employment of excellent personnel.

### 11.7 OTHER DISCLOSURES RELATED TO OWN WORKFORCE POLICIES

In its processes, the Unija ETL Group shall take into account applicable human rights regulations and related requirements relevant to its own workforce, including procedures and mechanisms for monitoring compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. There is zero tolerance for trafficking in human beings, forced labour and child labour.

In its Code of Ethics, the Unija ETL Group has implemented prohibitions and instruments to eliminate discrimination, including harassment, and promote equal opportunities, and other ways to promote diversity and inclusion.

The policy explicitly covers the following grounds of discrimination: race and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national or social origin, other forms of discrimination covered by EU and national law.

In addition, the Unija ETL Group implements specific policy commitments on inclusion or positive action for people in its own workforce who belong to groups at particular risk of vulnerability, namely persons with disabilities. That policy shall be implemented through specific procedures to ensure the prevention, mitigation and response to discrimination and to promote diversity and inclusion in general.

The Unija ETL Group has an adopted workplace accident prevention policy and a system for managing them.

### 12. S1-3 – PROCEDURES FOR CORRECTIVE ACTION REGARDING ADVERSE IMPACTS AND CHANNELS THROUGH WHICH MEMBERS OF THEIR OWN WORKFORCE CAN RAISE CONCERNS

At Unija ETL Group, we have a process in place to ensure that remedial action is taken in relation to any negative impacts on people in our own workforce, as well as channels available to our own workforce to raise concerns and address them.

The procedure for remedial action and channels for expressing concerns is introduced by *the Rules on the Prevention and Elimination of the Consequences of Mobbing and Harassment at Work (mobbing)* and *the regulation of the area of protection of whistleblowers in the Unija ETL Group* (hereinafter: the "Mobbing Rules").

There are no manufacturing companies in the Unija ETL Group, which makes the range of potential negative impacts on its own workforce smaller than in the case of companies engaged in manufacturing activity. For example, negative impacts such as emissions, accidents at work, shift work, handling of dangerous substances, etc. are common. We do not have such impacts on our own workforce, which would stem from the nature of the activity and the work process, in the Unija ETL Group. For this reason, the Rules on Mobbing are primarily intended to manage any negative impacts or violations that could arise from interpersonal relationships – i.e. to address a wider range of impacts on employees, including violations of legislation, internal rules or ethical principles, and in particular to prevent and eliminate the consequences of bullying and harassment in the workplace. At the same time, the Mobbing Policy establishes channels for our employees to raise concerns and establishes a process to provide redress and a mechanism for dealing with complaints about employee-related matters.

On the basis of the Rules, the whistleblower may provide information about a breach using various internal reporting channels (channels).

One of these channels is reporting to **the Confidant**. The Unija ETL Group has appointed Trustees from among its employees to receive and record applications. For this purpose, the applicant may use a pre-prepared form. Reporting to the Trustee can be submitted in several ways, namely via the intranet page, physically by mail, or in person at the Trustee by prior order by e-mail. The applicant may submit a report to the Commissioner in writing or orally (by phone, e-mail, at the address or in person). Reports may be made anonymously, or the reporting person may reveal his/her identity.

Upon receipt, the trustee records the report in the information system (document system), performs a preliminary test to determine whether the conditions for consideration are met and handles it in accordance with the provisions of the Rules. At the end of the examination of the application, the trustee shall inform the applicant of the justification for the application, the proposed and implemented measures and the outcome of the procedure. It also (taking into account the protection of the identity of the whistleblower) informs the company's management of the findings of the report, which assesses the effectiveness of the corrective action.

In addition to the institute of the Trustee, we have established other channels for reporting and dealing with potential violations in the Unija ETL Group. In the event of violations, employees can also report to the Joint Committee for the Prevention and Elimination of the Consequences of Mobbing. It deals with violations and is authorized and responsible for drawing up a programme of measures and proposing possible sanctions against violators. At the same time, the Joint Committee can directly implement informal measures and moral sanctions that have no legal consequences (interviews, warnings, recommendations, advice, reprimands, requests for public apologies, etc.).

However, the company's management is responsible for the implementation of any proposed formal legal measures and sanctions, as the employer's representative, thus ensuring the effectiveness of the channels available to employees.

Regulating the internal reporting process and protecting friends is extremely important to ensure transparency, integrity and accountability in society. For this reason, we regularly preventively remind our employees of the importance of respecting mutual integrity and correct relations with colleagues. In addition, we inform them of the availability of existing reporting channels and encourage them to report any potential suspected violations.

In accordance with the Rules on Mobbing, the whistleblower enjoys absolute protection and protection against retaliation.

At the Unija ETL Group, employees' familiarity with the above-described structures and procedures for expressing and addressing concerns and their trust in them is assessed in the context of two-way communication and employee satisfaction surveys.

If the reporting person considers that the internal reporting could not be dealt with effectively or if he considers that there is a risk of retaliation in this case, he or she may also submit his or her external report to the competent authority in relation to the field of work.

### 13. S1-6 – CHARACTERISTICS OF EMPLOYEES IN THE ENTERPRISE

Below, we reveal the key characteristics of the employees who were part of our own workforce at the end of the relevant period **as of 31/12/2024**. Information on the number of employees is provided on the basis of the number of persons and not on the basis of full-time equivalents (FTEs).

As of 31.12.2024, 421 persons were employed in the Unija ETL Group. Compared to 31.12.2023, the number of employees increased/decreased by 18 persons.

**Table 8** - Presentation of information on the number of employees with a breakdown by gender\*

Gender	Number of employees	
	2023	2024
Man	-	87
Female	-	334
Not reported	-	-
Total number of Employees	403	421

\*Gender, as determined by the employees themselves.

**Table 9** - Presentation of the number of employees with a breakdown by country\*

State number of persons	Number of employees	
	2023	2024
Slovenia	146	145
Croatia	118	114
Other countries combined (Serbia, Bosnia and Herzegovina, Montenegro, North Macedonia)	139	162

\*In accordance with disclosure requirement S1-6, disclosure is only mandatory for countries where the company has 50 or more employees representing at least 10% of total headcount, but we also disclose information for countries where we do not meet this threshold.

**Table 10** - Presentation of information on employees by type of contract in 2024

	Women	Man	No tax	Together
Number of employees	334	87	-	421
Number of permanent employees	317	82	-	399
Number of temporary employees	15	7	-	22
Number of employees without a guaranteed number of working hours	-	-	-	-
Number of full-time employees	317	82	-	399
Number of part-time employees	15	7	-	22

**Table 11** - Presentation of information on employees by type of contract, broken down by region

	Slovenia	Croatia	Other countries	Together
Number of employees	145	114	162	421
Number of permanent employees	136	109	154	399
Number of temporary employees	9	5	8	22
Number of employees without a guaranteed number of working hours	-	-	-	-
Number of full-time employees	136	109	154	399
Number of part-time employees	9	5	8	22

The total number of employees who left the Unija ETL Group in 2024 (reporting period) is 62. This includes the total number of employees who voluntarily left the company, were laid off, retired or died during the reporting period.

The employee turnover rate during the reporting period is 13%.

## 14. S1-7 – CHARACTERISTICS OF WORKERS WHO ARE NOT EMPLOYED IN THE COMPANY'S OWN LABOUR FORCE

The ESRS standards define workers who are not employed in their own labour force as persons who have a contract with an enterprise to perform work (»self-employed«) or persons provided by enterprises that mainly carry out »employment activities« (so-called agency workers).

The Unija ETL Group does not have employees who are unemployed in its own workforce, which is why it does not make disclosures in accordance with the disclosure requirement S1-7.

## 15. S1-8 - COVERAGE OF COLLECTIVE BARGAINING AND SOCIAL DIALOGUE

The Unija ETL Group pays special attention to social dialogue, cooperation with employees, freedom of association, and workers rights to information, consultation and participation. At the outset, it should be emphasized that the social dialogue in our Group takes place in an unconventional way, as it does not take place with employee representatives (workers representatives, trade unions, works council), but directly with the employees themselves. The channels, mechanisms and method of conducting social dialogue are described in detail above under Chapter No. 11.2 Channels and mechanisms for the implementation of two-way communication between management and employees.

Companies in the Unija ETL Group are not bound by collective agreements (disclosure S-8). The Unija ETL Group conducts social dialogue directly and explicitly with all employees themselves. We believe that this method is better than conducting social dialogue through workers' representatives, because in this way the voice of each individual employee can really be heard and taken into account. Nor shall the companies in the Unija ETL Group be bound by communication or representation within the european works council, the works council of the european company or the works council of a european cooperative society.

## 16. S1-13 – METRICS OF TRAINING AND SKILLS DEVELOPMENT

At Unija ETL Group, we continuously invest in the education, training and development of our employees, which enables their professional growth. Below we provide information on regular reviews of performance and career development, as well as the scope and type of training.

In accordance with the ESRS standards, a periodic performance review is defined as an examination based on criteria with which the employee and his/her supervisor are familiar, which is carried out at least once a year with the knowledge of the employee. It may include an assessment carried out by the employee's immediate superior, the employee's co-workers or a wider group of employees. The human resources department may also be involved in it.

In 2024, we planned and conducted 421 employee performance reviews (100% of all employees participated in the reviews).

In 2024, the average number of hours of training per employee was 50 hours. Training and education relate to the following areas: foreign language courses, knowledge of tax regulations, labour law, information literacy, communication, etc.

## 17. S1-15 – WORK-LIFE BALANCE METRICS

In our company, we enable employees to reconcile work and private life as much as possible and guarantee them the right to disconnect. The policies, measures and objectives adopted for this purpose are presented under Chapter 11.3 - Employee-friendly working conditions that enable work-life balance

Below we reveal the extent to which employees are entitled to and take leave for family reasons

According to the ESRS standards, family-related leave includes maternity leave, paternity leave, parental leave and carers' leave available under national law or collective agreements. The standard defines these terms as follows:

- a. maternity leave: absence from work with job security for working women immediately before and after the birth (or adoption in some countries) of a child;
- b. paternity leave: leave taken by fathers or, where and to the extent recognised by national law, equivalent other parents, at the time of the birth or adoption of a child for the purpose of providing care;
- c. parental leave: leave for parents in the event of the birth or adoption of a child for the purpose of caring for that child, as defined by each Member State;
- d. carer's leave: leave for workers to provide personal care or support to a relative or a person living in the same household who is in need of significant care or support for serious health reasons, as defined by each Member State.

In the Unija ETL Group, in accordance with the conditions set out in the applicable regulations in the individual countries where we have companies in the group, all employees are entitled to leave for family reasons. The percentage of employees entitled to leave for family reasons is therefore 100%.

# XIII. COMPANY - ESRS S4 - CONSUMERS AND END-USERS

## 18. ESRS 2 SBM-2 – STAKEHOLDERS' INTERESTS AND VIEWS

Clients and end users of our services come from a very wide and diverse range of companies, as we offer services that most companies need for their operation (payroll, accounting, IT, consulting). As many as 99% of our clients are companies, while the share of natural persons is practically negligible. Nevertheless, natural persons are an important stakeholder in the lower part of our value chain, as we process the data of our client's employees (payroll, accounting) for most of our services. For this reason, natural persons represent key stakeholders in terms of ensuring the security of their personal data and the S4 standard, regardless of the fact that we are not in a direct business relationship with them. At Unija ETL Group, we try to take into account their interests, views and rights in every business decision.

At Unija ETL Group, we are constantly adapting our strategy and our business model to ensure that the interests, views and rights of end users and natural persons are respected. We have put in place an effective legal framework and practical mechanisms to protect and enforce the rights of natural persons as more vulnerable market participants. Information, education, advice and support to end users are key to this. In addition, it is important to continuously adapt policies, internal regulations and business processes to new realities such as digitalisation and the green transition, thereby increasing consumer protection and empowerment in the modern market environment.

## 19. ESRS 2 SBM-3 – SIGNIFICANT IMPACTS, RISKS AND OPPORTUNITIES AND THEIR RELATIONSHIP TO STRATEGY AND BUSINESS MODEL

The Unija ETL Group has identified significant impacts, risks and opportunities related to consumers and end-users, as outlined in Table 12 below

**Table 12** – Significant impacts, risks and opportunities in the area of Consumers and end-users

IMPORTANT IROs	ESG THEME
1 Successfully ensuring the security of customer and end-user data	OPPORTUNITY S4 Consumers and end-users

The disclosures in this sustainability statement include **all consumers and end-users who could be significantly influenced by the Unija ETL Group**. In the process of dual importance analysis, in the area of consumers and end users, we examined and analysed IROs that are related to our own activities and the company's value chain, including through our products or services and through our business relationships, and in the end we identified one important opportunity.

The following is how it is taken into account in the company's strategy and business model for the identified important opportunity and contributes to their adaptation.

The main services of the Unija ETL Group are: accounting, payroll, consulting services and IT solutions. All of those activities could have negative impacts on the right to privacy, the protection of per-

sonal data, freedom of expression and non-discrimination against consumers and end-users. In addition, due to the nature of the personal data we process in the course of our business, consumers and end users are particularly vulnerable to privacy impacts. For this reason, **ensuring effective protection of consumer privacy and data** is essential to our business model and the internal processes we implement. **Reliability and discretion of services and customer trust are of key importance in our industry.**

- **Internal legal and organizational framework of the Unija ETL Group:** The Group adopts appropriate policies and procedures for the protection of personal data that are in accordance with the General Data Protection Regulation (GDPR) and Slovenian consumer protection legislation. It includes control mechanisms, regular training and adjustments of business processes according to current legal requirements.
- **Consumer rights:** Consumers have the right to access, rectify, restrict the processing and erasure of personal data, the right to complain and the right to be informed about the purposes and legal bases for the processing of their data.
- **Support from the European Consumer Centre (ECC):** If there are problems with providers from other EU countries, consumers can seek help from the EPC network, which can effectively mediate in resolving disputes over the protection of consumer rights.
- **Information Commissioner (IC):** The national supervisory authority for the protection of personal data, which receives complaints and monitors compliance with legislation in the field of personal data protection.
- **Protection processes and mechanisms in place:** This includes systemic security measures (encryption, access restriction, processing logs), clear privacy statements, obtaining consents, and regular data protection risk assessments.
- **Consumer education and information:** The Unija ETL Group aims to make consumers aware of their rights and data protection safeguards, thereby increasing their ability to manage personal information independently. In general, a consumer in the Unija ETL Group can benefit from legal protection, access to information, support from supervisory authorities and the possibility to resolve disputes through institutions that comply with EU law (GDPR) and national law for effective control and protection of consumer data.

## 20. S4-1 – POLICIES, S4-4 MEASURES AND S4-5 OBJECTIVES

The following **are collectively made disclosures in accordance with:**

- S4-1 - Policies relating to consumers and end-users
- S4-4 - Taking measures in relation to significant impacts and approaches to mitigating material risks and seizing significant opportunities in relation to consumers and end-users, and the effectiveness of those measures and approaches
- S4-5 – Objectives relating to the management of material adverse impacts, the promotion of positive impacts and the management of material risks and opportunities

**and separately for a recognized significant opportunity.**

Given that we do not have significant adverse impacts or risks in S4 - Consumers and End Users, we have not designed disclosures in accordance with the disclosure requirement *S4-2 - Procedures for engaging with consumers and end users regarding impacts and the disclosure requirement S4-3 - Procedures for corrective action regarding adverse impacts and channels through which consumers and end users can raise concerns.*

## 21. SUCCESSFULLY ENSURING THE SECURITY OF CUSTOMER AND END-USER DATA

Successfully ensuring the security of customer and end-user data represents an opportunity for the Unija ETL Group, which by its nature arises from the successful management of data security risks. By implementing various mechanisms, procedures and safeguards, the Unija ETL Group successfully ensures data security, which brings us competitive advantages in the market.

### POLITICS (S1-1)

To manage this risk, the Unija ETL Group has adopted the following policies in the form of internal Group standards (so-called »ISUs«) and various programmes developed:

- **ISU 002 Security policy for employees** The standard introduces and defines the processes to be followed by Group employees when handling sensitive data. A uniform system of determination, protection and access to data that is a trade secret in all aspects of use – treatment, processing, storage and destruction – has been established. The standard enforces the following security policies
  - SP of Clean Desk and Clean Screen
  - SP of password usage
  - SP Workstations
  - SP of Laptop, Mobile, and Remote Work
  - SP Email
  - SP of confidentiality
  - Security Incident SP
  - SP for remote customer connection
  - SP of Customer Data Management and Rights Assignment
- **ISU ITS-01 Security policy for IT support.** The standard introduces and defines the processes that employees in the IT department must follow when providing IT support to other departments. The standard enforces the following security policies
  - SP of correct use of the information system
  - SP Audit Trails
  - SP of data removal and destruction of electronic media
  - VP Backups
  - SP of Customer Data Management and Assignment of Rights
  - HR change management
  - SP for third parties
  - SP of use of cryptographic controls
  - SP of Annual Archive Retention
  - SP Password Security Policy
  - SP of Email Protection

The *ISU 002 Security policy for employees* applies at the level of the entire Unija ETL Group and partly at the lower end of the value chain for our customers. All our employees are responsible for the implementation of the policy, and the highest responsible level in the company's organization is the Management.

On the other hand, the *ISU ITS-01 Security policy for IT support* applies to employees in the IT department, and the following are responsible for its implementation in practice: IT Business Director, IT Business Managers, Helpdesk Group Leader, System Integration Group Leader, Security Group Leader, IT Process Manager and System Engineers.

The interest of subscribers and end-users as key stakeholders was primarily taken into account in the formulation of the policies described. In taking advantage of this opportunity, the Unija ETL Group uses two different principles, namely preventive measures and processes implemented at the level of the entire company and, on the other hand, the continuous development of new technological solutions and the improvement of existing processes by the IT department.

The described policies are available to staff and policy implementers on the Unija ETL Group's intranet page. The Unija ETL Group conducts in-depth and regular training of employees in the form of interactive training with testing.

### MEASURES (S1-4)

In order to ensure data security, the Unija ETL Group implements numerous (and diverse) measures, which together form an established and maintained information security management system. This ensures:

- systematic identification and management of security risks,
- regular risk assessment and implementation of appropriate measures,
- consistent management of access, data and information assets;
- conducting internal and external security audits,
- awareness and training of employees on safety policies and procedures.

We have also obtained the ISO/IEC 27001 certificate for the organization of measures combined into the information security management system. The system is used at the level of the entire Group and at the level of our customers in the lower part of our value chain.

The IT department regularly monitors the implementation of the information security management system, which takes place on a 24/7 basis.

### OBJECTIVES (S1-5)

With the policies described above and measures for their implementation, we ensure the stable operation of the system, prevent security incidents and data theft. Even in emergency situations, we ensure business continuity in all business units of the Unija ETL Group and the provision of services to our customers.

# XIV. GOVERNANCE - G1 BUSINESS CONDUCT

The basis of corporate governance at the Unija ETL Group is built on a solid corporate culture based on values such as integrity, transparency, accountability and respect for the interests of all stakeholders. In addition, effective management modes that ensure compliance with rules and legislation, clear decision-making processes and effective communication between managing and supervisory authorities are crucial.

Key elements of corporate governance in the Unija ETL Group

- **Corporate Culture:** Promotes ethical conduct, commitment to business excellence and sustainable development. This culture is based on respect for employees, partners and the wider community, which builds trust and long-term business relationships.
- **Effective management methods:** These include the establishment of clear functions and responsibilities within the internal organisation, such as the board of directors, the supervisory board and other key bodies. These authorities shall operate with the highest standards of management and supervision in mind.
- **Transparency:** Regular reporting on operations, financial results and key decisions improves transparency and gives stakeholders access to relevant information.
- **Reference to legislation and good practices:** Compliance with applicable regulations and recommendations of international and domestic codes of corporate governance ensures compliance and long-term stability of business.

With this approach, the Unija ETL Group builds on trust and sustained performance enabled by the synergy of a strong corporate culture and effective governance mechanisms.

Under the Governance pillar, the Unija ETL Group has identified the following positive and negative impacts and associated risks in its dual importance assessment.

**Table 13** – Significant impacts, risks and opportunities in G1 Business conduct

IMPORTANT IROs		ESG THEME	
1	Various measures to promote corporate culture and corporate affiliation	POSITIVE IMPACT	G1-2 Business Conduct – Corporate Culture
2	Mechanisms in place to report possible irregularities and protect whistleblowers	POSITIVE IMPACT	G1-1 Business Conduct
3	Cybersecurity	RISK	G1-1 Business Conduct

## 22. G1-1 – CORPORATE CONDUCT POLICIES AND CORPORATE CULTURE

The Unija ETL Group establishes, develops, promotes and evaluates its corporate culture based on the following policies, which are described in more detail above:

- **ISU 001 Basic Rules Annex Group Values**
- **ISU BO-03 Employees Introduction**
- **ISU BO-11 Survey**
- **ISU BO-12 Employee Engagement Officer**
- **ISU 003 Absence**
- **ISU 007 Work from home**
- **ISU 008 Employee rules & benefits**
- **ISU 011 Meetings Culture**
- **ISU BO-02 Recruitment**
- **ISU 009 Employee promotion**
- **ISU 002 Security policy for employees**

All those policies relate to matters relating to business conduct and are implemented on a day-to-day basis and apply to all employees of the Unija ETL Group. The CEO or Management is in charge of their implementation.

These policies introduce, inter alia, the following **MEASURES AND MECHANISMS** by which the Unija ETL Group promotes a corporate culture:

- Clearly defined and communicated company values,
- Regular internal notifications and transparent communication (e.g. monthly e-newsletters, meetings with management),
- Onboarding program,
- Mentoring programs and internal training, Systems for rewarding and recognizing achievements,
- Annual interviews on performance and career development, Opportunities for advancement and education,
- Regular teambuilding and social events,
- Employee participation in decision-making (e.g. surveying, colleges),
- Introduction of flexible forms of work (e.g. working from home, flexible working hours),
- Care for the well-being of employees (e.g. psychological support, sports activities),
- Opportunities to express ideas and initiatives (e.g. internal suggestions for improvements);
- A clear and present role of leaders as carriers of culture,
- Celebrating shared successes and important milestones,
- Socially responsible projects involving employees.

The Company does not currently implement anti-corruption or anti-bribery policies in accordance with the United Nations Convention against corruption and has no plans to implement them in the near future.

The Unija ETL Group has internal reporting and whistleblower protection channels in place, as well as procedures for the timely, independent and objective investigation of incidents related to business conduct, including incidents of corruption and bribery. More detailed disclosures on this topic are provided under Chapter 12: S1-3 - Procedures for remedial action on adverse impacts and channels through which members of their own workforce can raise concerns.

As part of the Talent Programme for Future Managers, the Unija ETL Group conducts internal training in the field of business conduct. The target group of such training is all managerial staff, and it is carried out several times a year (depending on the needs).

By implementing preventive measures and a system of internal controls, the Unija ETL Group has successfully reduced the risk of corruption and bribery in such a way that we do not have a position in the company that would be exposed to this risk.

#### **CYBERSECURITY**

We address cybersecurity risk through the following policies: tveganje kibernetne varnosti naslavljamo s sledečimi politikami:

- **ISU ITS-01 Security policy for IT support,**
- **ISU ISO-1 Business continuity plan,**
- **ISU ISO-1 BCP - Security Management and Incident Response**
- **ISU ISO-2 Risk Management**

We have put in place special security measures by forming an **internal cybersecurity team** responsible for:

- monitoring of security events and responding to security incidents,
- conducting regular vulnerability and penetration tests,
- developing and updating security policies and procedures;
- participation in projects for the development of information infrastructure from the point of view of security,
- Implementation of awareness campaigns for employees (phishing simulations, security workshops, etc.)

## **XV. ENVIRONMENT - E1 CLIMATE CHANGE**

### **23. BP-1 GENERAL BASIS FOR THE PREPARATION OF THE SUSTAINABILITY STATEMENT**

Sustainable aspects of business (environmental, social and governance) are embedded in the mission and strategic orientations of the Unija ETL Group. For many years, we have been gradually incorporating them into our business processes through the introduction of ISO systems, thus encouraging the transition to sustainable operation.

### **24. BP-2 DISCLOSURES RELATING TO SPECIAL CIRCUMSTANCES**

In its activities, the Unija ETL Group is committed to complying with Slovenian and EU legislation in the field of ensuring security of electricity supply, access to the grid, internal electricity market rules, environmental protection and public procurement.

#### **24.1 MANAGEMENT SYSTEM AND CERTIFICATES OBTAINED**

An integrated management system in an organization represents a holistic approach to management based on process orientation. With this system, the organization effectively coordinates and directs its activities and processes in accordance with established standards and models.

Within this system, policies are defined that cover all key segments of the organization's operations. These policies lay the foundation for the implementation of standards and guidelines and ensure that operations comply with the required regulations.

Once a year, we carry out comprehensive audits of certified management systems, both internal and external, covering standards such as:

- ISO 9001:2015 (Quality management system)

These audits are a key mechanism for continuous improvement of organizational processes and ensuring the highest quality standards.

### **25. GOV-3 INCLUSION OF SUSTAINABILITY-LINKED PERFORMANCE IN INCENTIVE SCHEMES**

Sustainability-related performance is not included in incentive schemes.

## 26. GOV-4 SUSTAINABILITY DUE DILIGENCE STATEMENT

Due diligence is carried out through internal and external audit, as well as internal and external audit. We do not carry out the due diligence process as indicated by the ESRS.

Sustainability reporting includes all activities of the Group, but excludes the upstream and downstream value chains. The internal audit will conduct an internal review of the sustainability reporting process in 2026.

The main negative impacts of the Unija ETL Group's own activities on people and the environment are the operation of computers and servers for data transmission (electricity consumption). In accordance with the legislation, the Unija ETL Group is taking all measures to mitigate these impacts.

## 27. GOV-5 RISK MANAGEMENT AND INTERNAL CONTROLS OF SUSTAINABILITY REPORTING

The company is subject to strict rules and regulations at national and European level. Changes in legislation, especially in the area of environmental regulations, may bring new requirements. A company must ensure compliance with all regulations and ensure transparent reporting on its operations.

With high standards of governance, transparency and prevention of corruption in its business practices, the company continuously improves the integrity of management.

The main risks in the preparation of quantitative values arise from inadvertent errors in the manual collection of certain data, as well as from a lack of understanding of the ESRS requirements for data inclusion. Understanding of the ESRS requirements will improve over time and with employee sustainability training. The availability of specific emission factors (timeliness and existence of data) also poses a risk.

The integration of the findings of the risk assessment and internal controls related to the sustainability reporting process into the relevant internal functions and procedures, describing the periodic reporting of those findings, will be defined after the first reporting.

## 28. SBM-1 STRATEGY, BUSINESS MODELS AND VALUE CHAIN

### 28.1 VALUE CHAIN

The value chain of the Unija ETL Group encompasses different stages, from acquiring the necessary resources and technologies to provide services to customers and collaborating with various stakeholders, including government institutions, local communities and other partners.

## 29. SBM-2 STAKEHOLDER INTERESTS AND VIEWS

The structure of the key stakeholders of the Unija ETL Group is not a constant, but is dynamically changing depending on the complexity of changes in the wider social environment.

## 30. SBM-3 SIGNIFICANT IMPACTS, RISKS AND OPPORTUNITIES AND THEIR RELATIONSHIP WITH STRATEGY AND BUSINESS MODELS

Under the Environment pillar, the Unija ETL Group has identified the following significant negative impacts in its assessment of dual importance.

**Table 14** – Significant impacts, risks and opportunities in area E – Environment.

IMPORTANT IROs		ESG THEME
1	Greenhouse gas emissions	NEGATIVE IMPACT E1 – Climate change – adaptation to climate change

The Group's direct emissions are generated by from the use of diesel and petrol vehicles, from the combustion of heating oil and natural gas for heating. Occasionally, fugitive emissions are also generated in the company due to unintentional releases of refrigerant gases from HVAC devices. Indirect Scope 3 emissions also account for a significant share of emissions, in the upstream value chain. All these emissions contribute to global warming.

The Unija ETL Group has implemented several measures to mitigate the negative impact of greenhouse gas emissions, one of the key ones being paperless operations, which help reduce energy consumption, CO<sub>2</sub> emissions, and our overall environmental impact.

Paperless operations allow us to digitise all documents and business processes, thereby reducing the need for physical paper and improving the efficiency of information management. Digital documents are stored in electronic systems, enabling quick retrieval, editing, and secure storage of data without generating waste or unnecessary energy consumption through printing and distribution. Additional benefits of electronic operations include increased operational efficiency and productivity, better traceability and easier archiving of documents, and improved data security through the use of digital infrastructure.

Furthermore, communication with external stakeholders and within the company is mostly carried out electronically, reducing our reliance on logistical processes, packaging, and transportation of physical documents. This approach is not only environmentally friendly but also economically efficient, as it reduces printing costs, the need for storage space, and the expenses related to the physical sending of documents. Paper production is associated with high consumption of natural resources, greenhouse gas emissions, and pollutants; therefore, the shift towards electronic operations directly contributes to reducing the company's environmental footprint.

The Unija ETL Group supports its sustainable operations strategy through the continuous implementation of modern digital solutions, enabling sustainable and responsible information management.

## 31. IRO-1 DESCRIPTION OF PROCEDURES FOR IDENTIFYING AND ASSESSING SIGNIFICANT IMPACTS, RISKS AND OPPORTUNITIES

### **32. SUSTAINABILITY CONTEXT AND GLOBAL MILESTONES**

By developing a sustainability strategy, we want to strengthen the operation of the Unija ETL Group and be even better prepared for the transformation of the energy market in accordance with the requirements to address climate change. In doing so, we are building on the Paris Agreement and the European Commission's goal of making Europe the first climate-neutral continent.

### **33. RELEVANCE ANALYSIS**

As part of the fundamental analysis of importance, we have identified the most important (most essential) topics for sustainable development in a multi-stage process at Unija ETL Group. Topics have been identified and selected based on analyses of national and international sustainability standards, energy supply standards and transmission systems, benchmark analysis and internal workshops on relevance. These findings have been reviewed, supplemented, quantified and prioritised by in-house experts, in accordance with the materiality methodology. In this process, the expectations of internal and external stakeholders were taken into account.

### **34. IRO-2 ESRS DISCLOSURE REQUIREMENTS COVERED BY THE COMPANY'S SUSTAINABILITY STATEMENTS**

In determining the relevant information regarding impacts, risks and opportunities, we took into account the legislative requirements and requirements of the ESRS, the interest of stakeholders in certain information expressed so far, and the analysis of internal data related to each thematic standard.



