

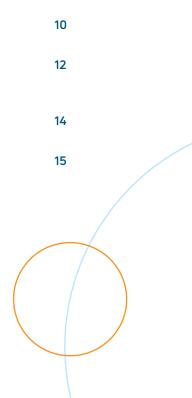
## Corporate Social Responsibility



nets:

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# Towards a more digitised Europe

The payments industry is undergoing a period of unprecedented change. New technologies, new players, and new regulation all shape the future of payments to the benefit of businesses and citizens that gain still easier access to secure, stable and innovative solutions. At Nets, we are playing our part in shaping the future of the payments industry. We take our role in the transformation seriously and we work with international standards on responsible business conduct and aim at becoming a leading European payments player.

For Nets, 2019 marked a year of profound change, where we worked hard to get our acquisitions in the DACH region and Poland fully integrated into the Nets Group. These developments have made Nets a genuine European payment service provider with on the ground operations in thirteen European countries.

With our transformation from a Nordic to a European payment service provider we are also faced with the challenge to transform our efforts in the corporate responsibility and sustainability area. We are fortunate that we can build on our Nordic experiences and consolidate our efforts at group level, and we see it as an opportunity to bring the positive impacts of digitisation to new frontiers across Europe. We invest in, operate and maintain a worldclass infrastructure for our customers, enabling them to serve their customers in the best possible way. We work continuously to earn and renew the trust of our many stakeholders and the public, and we collaborate in making sustainable business solutions in a responsible manner by ensuring that respect for human rights and the environment are integral parts of the daily running of our business.

While citizens, businesses and governments experience a gradual increase in efficiency, transparency and simplicity through digitalisation of everyday lives and routines, we also recognize the challenges that digitisation could bring to some. Digital products and solutions put demands on the end-user, and not all groups in society benefit equally from digitalisation. We therefore see it as part of our responsibility to contribute to digital inclusion by involving stakeholders and helping to advance digital capabilities and skills.

In 2019, we filed our first Communication on Progress to the UN Global Compact, and we have thereby started our journey of reporting externally on our corporate responsibility activities in a more systematic way. We will continue our commitment to integrate the 10 principles



of UN Global Compact into our business and to strengthen our framework across the Nets Group. 2019 also marked a landmark on our responsibility journey as we relocated to new and more sustainable headquarters. Finally, we thoroughly strengthened our supplier management framework with regards to ensuring the respect for the environment and human rights throughout the supplier value chain.

This report is our second Communication on Progress report in which we describe our progress in three thematic areas - driving digitisation, responsible employer and responsible operations. We are committed to continuing the journey.

Sincerely,

**Bo Nilsson** CEO of the Nets Group

## About this report

This report collects and describes the Corporate Social Responsibility (CSR) framework and achievements of the Nets Group in 2019. The report serves as Nets' Communication on Progress to the UN Global Compact for 2019.

#### Assessment of Corporate Social Responsibility initiatives

In 2019, Nets has continued to strengthen the CSR framework which was formalised in 2018 when we became UN Global Compact signatories. Our long tradition of working with CSR has been consolidated and formalised across the Group due to good work from policy owners, the guidance provided by the CSR Steering Committee, and ultimately the Board of Directors who approved updated group-wide CSR policies in June 2019.

Our corporate responsibility framework builds on the ten principles of the UN Global Compact and consists of 9 policies with individual targets and dedicated policy owners. The Nets CSR policy sets the strategy and is described on page 7.

#### The structure of this report

This report is divided into seven sections describing our business model, our CSR

framework and governance, activities and key achievements in on our three thematic areas of corporate responsibility, our assessment of risk within corporate responsibility, and finally our focus areas for 2020.

It is the second progress report and it covers a year where Nets has expanded to new countries and fully integrated businesses in countries outside the Nordic region. It has, therefore, been a challenge to collect data and to measure it against targets set previously. As a starting point the data in this report describes the Nets Group at the end of 2019, if data for the Nordic region is being used, it will be mentioned specifically. The data are collected and calculated across the Nets Group to quantify and report on the activities carried out by Nets to implement the CSR policies. Going forward, we aim at strengthening our data collection methodology and to be able to build on the experiences we have gathered so far.

#### Overview of how Nets implements the ten principles of the UN Global Compact

WE SUPPORT

UN Global Compact Principles	CSR activity & Nets policy area	Page number in this report
<b>Principles 1-2</b> Human rights	- Supplier Code of Conduct	Page 10
	- Human and Labour Rights	Page 12
	- Diversity	Page 13
<b>Principles 3-6</b> Labour rights	- Supplier Code of Conduct	Page 10
	- Work environment	Page 13
<b>Principles 7-9</b> Climate and environment	<ul> <li>Energy consumption</li> <li>Waste management</li> <li>Reduction of CO<sub>2</sub>- emissions</li> </ul>	Page 11 Page 11 Page 9
Principle 10 Anti-corruption	- Whistleblower scheme - Anti-Bribery & Corruption	Page 10 Page 10

### Our business model

We see a rapid development in payments these years with digitalisation influencing our habits and behaviour within banking, shopping and life in general. Nets plays a key role in this digital transformation by developing secure and responsible payment solutions.

#### Our starting point

Based on the dedicated work of more than 4,000 Nets employees, we strive to foster a culture of security, stability, trust, innovation and easiness to become the preferred payment partner for European merchants and issuers of payment instruments. Our strong presence throughout the payments value chain, our scalable platforms, and our deep-rooted local knowledge are key to ensure that we provide the best possible digital payment experiences for our customers.

#### What we do

We provide a number of digital services and facilitate secure data processing as part of the transaction between our customers and endusers. Whether it is for buying groceries, paying bills online or dealing with public authorities, online services offer greater convenience and free up time in people's everyday lives. Behind this seemingly simple exchange of services is a complex web of processes, initiated by a digital transaction such as a payment, an authentication or a digital login. We operate a deeply entrenched network which connects merchants, financial institutions, enterprises and consumers, enabling them to make and receive payments and use value-added services.

We have our core business in the following 3 areas:

#### 1. Merchant Services

Our Merchant Services business offers payment acceptance solutions across channels (in-store, online and mobile) with the broadest range of payment methods and value-added service for electronic receipts and loyalty solutions, all with a simple and fast set-up. This enables merchants to accept payments, easily and without friction regardless of channel, to receive the settlement in their bank account and get detailed reconciliation information and statistics, all in different currencies and frequencies depending on merchant needs and consumer preferences.





#### 2. Issuer and eSecurity Services

Our Issuer and eSecurity Services business offers a one-stop-shop for payment processing services, a full range of Fraud & Dispute services, a tailored Consumer Management Services solution, innovative, flexible and reliable mobile payment solutions, as well as data analytics ensuring high quality and cost efficiency.

#### 3. Corporate Services

Our Corporate Services business offers account-to-account services, including clearing and instant payment services, and e-billing solutions. In August 2019, these services were divested to MasterCard. Upon regulatory approvals expected in 2020, these services will be transferred to MasterCard.

#### Value creation

We empower merchants to benefit from the digitisation of payments, we help them successfully start up and grow, reduce cost, risk and complexity, and to improve customer experience and business insights. In parallel, we help issuers stand out through best-in-class payment solutions in a digital world where end-user differentiation defines the winners. For individual end-users we provide secure and reliable payments and communication channels which respect and protect data in the best possible way. At the same time, we drive forward digitisation of European societies in a way that underpins financial inclusion, increases efficiency, and reduces transactional cost related to cash handling and manual paper work.

#### Our customer promise

We have made a promise to put our customers first in everything we do. In a world of constant change, listening to our customers to predict their needs and create best-in-class experiences for them is important like never before. We have discovered a need for a stable and secure payment service provider that makes it easier for banks and merchants to do business and, in turn, make life easier for end-users.

## Corporate Social Responsibility at Nets

Nets plays an important role in digitalising the society and we take our role and responsibility seriously. We therefore work with business partners and stakeholders to prevent negative impact on society as we strive to be responsible and transparent in the way we develop secure business solutions. As a signatory to the UN Global Compact we are committed to integrate human rights, environmental and anti-corruption measures into our daily work.

#### Our approach to CSR

Our approach to CSR is derived from our Nordic heritage and the way we have contributed to the development of digital payments and related services in the most digitised region in Europe. Nets has played a key role in shaping a new digital reality based on stability, security and responsible innovation. It's our ambition to turn a complex reality into easy, intuitive and customer-oriented solutions developed in a responsible and sustainable way which will ensure that we remain a reliable hub of the European payments industry.

Our commitment to corporate responsibility is aligned with our ambition of becoming a European payments champion while recognising and respecting the social, environmental and economic impact that Nets has through the digitisation of the countries in which we operate.

#### Our CSR framework

Our CSR framework has over the past years been formalised and since 2018, the framework has been governed by our CSR policy and eight detailed policies embedding the ten principles of the UN Global Compact. Our framework consists of three strategic pillars: Driving digitisation -Responsible employer - Responsible operations.

#### Our CSR governance structure

Nets' policies have been adopted by the Board of Directors and the overall responsibility for CSR at Nets lies with the Executive Committee, which has appointed a Steering Committee to oversee the implementation. The daily work on policy activation is carried out by the respective policy owners with the assistance of the corporate responsibility department.

#### Overview of the three pillars and their foundation



#### Pillar 1

Driving digitisation is based on our commitment to provide easy and secure payment solutions to all – something we strive to do through the products, services, and partnerships we provide to customers and the end-users.

#### Pillar 2 Responsible operations

is based on our commitment to ensure responsible business conduct throughout our value chain and in our policies for Anti-Bribery and Corruption, Whistleblowing, Environment, and our Supplier Code of Conduct.

#### Pillar 3 Responsible employer

is based on our commitment to respect human rights, the well-being and development of our employees and in our policies for Human and Labour Rights, Diversity, Work Environment and our Ethical Policy.

## Driving digitisation

We are committed to deliver digital solutions that drive the development towards a digitised, paperless, and cashless society. We want to ensure that digitisation of society is based on services and products that bring social, environmental, and economic benefits to society, businesses, and end-users.

#### OUR KEY ACHIEVEMENTS IN 2019 Security and stability

In 2019, focus has been on the security agenda comprising several internal and external projects. This encompasses the systematic reporting of all detected attempts of phishing, smishing or other examples of digital fraud, and automation of the take-down of phishing sites has been a key focus for us. Throughout 2019, we have become a leading provider of information alerts to the safeguarding initiative "Mit Digitale Selvforsvar" that seeks to guide Danes to navigate safely on the web.

Throughout 2019, Nets has taken fraud monitoring and prevention to a new level using artificial intelligence with launch of our new anti-fraud engine Nets Fraud Ensemble. This brings added value and security to banks, merchants and consumers by hindering fraudulent transactions in real-time. This has generated solid results so that fraud related losses are today record low, even though attempts of fraudulent behaviour are historically high. For Dankort alone, 2019 marked an all-time record low with a drop of 46% in crime-related losses.

In March, Nets joined the Danish ICT Industry Association (ITB)'s Code on reporting security flaws. The Code provides guidance to external stakeholders on how to handle and report to Nets if a security incident is detected in any of our systems etc. To support this, we have developed a website that describes how we're handling potential issues and allows external parties to report on incidents via an online form.

#### Our approach to digitising society is based on three strategic themes:

**Easiness** - easier products and solutions is the foundation for growth and progress, and our digital solutions drive this development and will ensure reduction of environmental impact, cost savings for society, and allow citizens to reap the benefits of smarter and easier digital technologies.

Security & Stability - driving reliable digital ecosystems that unlock new and better opportunities for financial institutions and merchants, while always delivering unrivalled security and stability. We strive to provide a multi-layered security architecture and a strong security culture internally.

Digital Inclusion - smarter and easier digital technologies are not always accessible for all groups of end-users. We are committed to work to include the needs of special groups such as children, elderly people, and vulnerable groups.

#### *Case* Training of Nets employees

Nets employees must be well-informed and trained to understand the dangers when fraudsters try to steal and abuse credentials or other valuable pieces of information. As a central part of this, we have in 2019 continued issuing short e-learning modules (NanoLearnings) to all employees to raise awareness and drive the right behaviour related to information security. In 2019, we also introduced the gamified phishing training tool - Hox-Hunt – aimed at making employees better at recognizing phishing e-mails. At the beginning of the campaign, 87% of employees were to successfully recognize simulated phishing e-mails. At the end of 2019, this number increased to 95%. That is a very high success rate showing that Nets employees have become very good at recognizing fraudulent e-mails.

#### Easiness & Digital Inclusion

In 2019, we supported the roll-out of the donation platform "Tryg Overskud" where Dankort is being used as the payment engine. When enrolled users shop, they obtain bonuses that can again be donated for selected charity purposes. Our direct work with charity organisations was enhanced in 2019, where we extended the existing donations program coupled to use of Betalingsservice by charity organisations organised by ISOBRO. Together with Danish banks we increased donations by 500%.

2019 was the year where the free growth enhancing business insight tool, MyPayments, was introduced to merchants in still more European countries. The MyPayments app empowers merchants to find a smart real-time overview of their business and customers to grow their business further. At the MPE conference in Berlin, the MyPayments app was awarded the Best Data Analytics and Science Award.

#### Nets digitisation services reduces CO,-emissions

At Nets, we digitally sign about 12 million documents per year, send 70 million digital invoices and have about 1 billion documents archived digitally. Our ediEX platform for invoice distribution helps Nordic companies move invoices from paper to digital, and in total the signing and digital invoicing services bring about a positive environmental impact of 10,000 tons  $CO_2$ -emissions saved on an annual basis.

#### Case

#### The MyPayments app empowers merchants to plan, optimize and grow using data

Nets MyPayments app gives merchants a smart overview of their business and new insights about their customers. This enables merchants to track development from week to week, to know when business is peaking, if customers are recurring, how they perform against benchmarks, and other important aspects that empower and enable merchants to optimize their business based on card transaction data.





## Responsible operations

We aim to run our business in an environmentally conscious manner and to act with integrity. We support a preventative approach to environmental challenges, and we are committed to set reduction targets for our operations and work with our business partners and suppliers to ensure environmentally friendly business solutions across the value chain.

#### KEY ACHIEVEMENTS FOR 2019 Supplier Code of Conduct

For 2019, we set out the ambition to upgrade our supplier processes. In the fall, we launched a pilot phase in which suppliers were asked to self-assess and document their corporate responsibility efforts. We have evaluated the process and results, and for 2020 we will adjust the process based on our findings to ensure a thorough supplier assessment and a strong supply chain management with regards to corporate responsibility related risks.

#### Anti-Bribery & Corruption

Nets has a zero tolerance for bribery and corruption, and we condemn it in all its forms. Together with our Ethical Policy, our Anti-Bribery & Corruption Policy conveys this stance to ensure that our employees act with integrity and do not engage in any actions involving corruption and/or bribery. To certify that all employees are aware of the rules with which they must comply, we have set the target that all employees receive adequate annual training with a response rate above 75%. Following the adoption of the updated Anti-Bribery & Corruption policy in 2019, work has been initiated to develop a new robust training programme for all employees. The new training program is expected to be rolled out during first half of 2020.

#### Whistleblower scheme

The whistleblower scheme of the Nets Group continues to be in effect, allowing employees, the Executive Management, the Board of Directors and external stakeholders to report violations or misconduct, or suspicions thereof. Customers, vendors, consultants and other external parties can report under the whistleblower scheme through our website. Any reports received are investigated by an external law firm.

#### Our approach to Responsible operations

As an international payments company connecting consumers, businesses, and financial institutions across Europe, we consider it our responsibility to ensure sound business practises throughout our value chain. Our goal is to build business relationships with our suppliers and partners based on trust and long-term cooperation to deliver environmentally friendly and sustainable business solutions and gain mutually beneficial business relationships.

We are committed to ensure responsibility throughout our value chain, and we incorporate human and labour rights, environmental measures and ethical standards into our Supplier Code of Conduct. We have established internal policies and guidelines to ensure employees act with integrity and do not engage in any actions involving corruption and/or bribery and understand the importance hereof. Case

#### New sustainable headquarters in Ballerup, Denmark

Relocating to new headquarters, the following sustainability measures have been taken:

- Increasing focus on waste management: Shifting to bio-degradable disposable tableware in all relevant areas and mandatory sorting of waste at all waste stations to minimise amount of unsorted waste.
- Sustainable canteen: Specific measures in place to minimise CO<sub>2</sub> emissions, reduce plastic waste and disposable tableware – all by 25%.
- Car-pooling: Introducing car-pooling app with motorist association FDM and surrounding companies offering employees new options of getting to and from work reducing congestion, pollution, and travel time.

In 2019, six reports were submitted via our whistleblower channel. Two of the reports did not concern Nets at all, and two of the reports were out of scope concerning identity theft and a phishing attempt. One of the reports only contained a first name and no description of the issue, and one report was investigated by the external law firm but was assessed to be unfounded.





#### Environmental performance\*

	2019	2018	Differential
Reduction in CO <sub>2</sub> emissions from trav- el between locations	2,993 tonnes of CO <sub>2</sub> saved	3,718 tonnes of CO <sub>2</sub> saved	2019 saw an increase in air travel com- pared to 2018 due to extensive M&A and integration activities
Reduction in energy consumption	Energy consumption reduced by 3.5% compared to 2018	Energy consumption reduced by 13.5% compared to 2017	2019 resulted in a lower decrease than in 2018. However, in total, energy consumption has been reduced by more than 25% since 2014, exceeding the target of a 15% reduction in 2020 compared to 2014
Amount of unsorted waste	238 tonnes unsorted waste	227 tonnes unsorted waste	2019 saw several re-construction and re-location projects, including moving to a new HQ, driving up waste volumes
Paper consumption	1,8m sheets - a 14% reduction compared to 2018	2.1m sheets - a 13% reduction com- pared to 2017	In total, paper consumption has been reduced by 75% since 2014, signifi- cantly exceeding the target of a 15% reduction in 2020 compared to 2014

\* The data comprises the Nordic activities as we establish a new unified methodology for measuring and calculating across newly acquired units.

#### Environment and climate change

Our environmental policy entails commitments and targets for reducing CO<sub>2</sub> from travels, reducing energy consumption, reducing use of paper, as well as sorting and reducing waste. Overall, 2019 came with good progress on these parameters and for both energy consumption and paper consumption we have significantly outperformed our 2020 targets. In November, Nets moved to our new headquarters in Ballerup, Denmark. Circular economy has been a central tool in the renovation of the office buildings that now constitute the new headquarters. The ambitious approach of restoring and reusing materials at the headquarters has resulted in a more sustainable outcome with a minimum amount of resources wasted. At the new headquarters, a set of measures were implemented to make sure that new green practices were promoted.

## Responsible employer

We respect and prioritise the well-being of our employees across locations and countries, and we strive to have the best possible physical and psychological work environment, by providing a non-discriminatory, safe, and healthy work place for all, and we put focus on preventing work-related illness. Our aim is to provide all employees with a healthy work-life balance to reconcile the demands of working life and family life.

#### KEY ACHIEVEMENTS 2019 Ethical policy

As a key player in the digital payments eco-system, it is imperative to ensure that every decision made at Nets is ethically sound and responsible. Our "ACT" values (Accountable, Customer-driven, Together) lie at the core of everything we do, and Nets' Ethical Policy is based on them.

In 2019, we upgraded the ethical guidelines to become an ethical policy that all employees must comply with. Going forward, all new employees will be introduced to our ethical policy as part of the onboarding to Nets.

#### Human and labour rights

At Nets, we expect all our employees to take co-ownership of their own development to stay employable within and beyond Nets. One of the new features introduced in 2019 is an on-line learning platform providing everyone with learning opportunities at any time and on any device. The learning platform was introduced in Germany during Q3 and will be introduced in Croatia and Slovenia early 2020. By end-December 2019, a total of 2.585 employees have logged into the platform and the average time spent on the learning platform is 3,1 hours.

For 2019, our target was to reach a score of 66/100 in the employee engagement survey question on 'I have good opportunities to learn

#### Our approach to Responsible employer

Our overall aim is to be a responsible employer and provide a secure work place and an encouraging working environment. Our framework is guided by the United Nations' Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The aim is to ensure that we as a Group stay focused on non-discrimination and protection against harassment and continue to work on eliminating work-related illnesses and improving the health and safety of employees.

Further to this, we are committed to ensuring that our employees continuously increase their "employability" through continuous development adding new competencies throughout their careers at Nets.

and grow at Nets', with a 2025-target score of 75/100. For 2019, the result was 68\* putting us on track towards reaching the longer-term target.

#### Diversity

Nets aspires to be an attractive workplace for all current and future employees. We aim to offer employment on an equal basis, ensuring that

#### Case Personal Growth at Nets

Continuous professional development is important because it ensures employees continue to be competent in their work. Nets' ambition is to support employees' employability in Nets and beyond.

In 2019, a new concept - "Personal Growth" - was launched gathering all development initiatives under the headline "Powered by Growth" that works by the 70/20/10 principle of 70% learning on the job; 20% social learning; and 10% formal learning.

In 2019, focus on personal growth was increased by:

- launching a digital learning platform for all employees
- updating the corporate training curriculum and offer training within industry matters, sales and Agile
- re-igniting the impACT concept by making development talks a natural component of individual check-ins with leaders

\* Using Nordic figures to compare year on year. Going forward, we will establish group-wide benchmarks.

all our colleagues have equal opportunities for promoting their careers in the company, regardless of their nationality, ethnicity, disability, age, gender, sexual orientation, religion, or belief.

It is important for Nets that executives have the right skill-set, irrespective of gender. When filling management positions, Nets strives to

#### Case Women in Tech

We have set-out new initiatives to increase the number of women in Tech in Nets. We have done this by

- forming/joining professional networks in Denmark, Sweden and Norway
- launching an internal Advisory Board
- advertising for Tech positions using our new employer branding concept «powered by personality» showcasing female faces for tech positions

broaden the field of candidates as much as possible, to give men and women equal opportunities.

The Board of Directors of Nets A/S has set the target to have at least two female members. By year-end 2019, we were on track to meet that target having two female members of the Board of Directors of Nets A/S, corresponding to 50%.

#### Work environment

We are committed to provide the best possible physical and psychological working environment, providing a safe and healthy workplace for all. We therefore run an annual employee engagement survey, two shorter pulse surveys and a leadership effectiveness survey each year to give employees the opportunity to provide feedback and to strengthen our company culture and working environment.

For 2019, the target was to reach a score of 73\* in Nets' employee engagement survey, with a 2025 target of 80/100. The 2019 target was reached.

Further, at Nets we continuously work to prevent and reduce work-related illnesses. In 2019, the number of work-related accidents with absence was two, while a series of actions were initiated to prevent and handle stress and to strengthen focus on well-being at work.

\* Using Nordic figures to compare year on year. Going forward, we will establish group-wide benchmarks

Read more about our CSR activities and policies at

nets.eu/about-nets/csr

## Assessment of our risk within Corporate Social Responsibility

A part of our efforts in the CSR field is to assess our risk and evaluate to what extent we have solid processes in place to prevent a negative impact on society. We have based our risk assessment on the four themes from the UN Global Compact and have identified certain risks that run across the three pillars of our CSR framework.

We work to minimise the risks and have collected them in the following five categories:

#### Negative impact on the environment and climate

In general, Nets' products and services are about digitalising processes and replacing paper and thereby also reducing the CO<sub>2</sub>-footprint. We do, however, also operate out of office buildings which consume energy, and we depend on data warehouses that can contribute to a high energy consumption if not monitored and managed correctly. We have established an internal environmental management system which focuses on the areas we consider most relevant for our business, and we have established reduction targets and monitor and evaluate the developments on an annual basis.

#### Negative impact on human rights

In parallel with our European expansion we have seen a growth in the number of suppliers to Nets Group. This increases the risk that we could indirectly be complicit in abuse of human and labour rights, which could lead to fines, customer loss and damaged reputation. As a signatory to UN Global Compact, we are committed to actively ensure that human and labour rights are protected and respected throughout our supply chain. We have therefore strengthened our procurement set-up aiming to reduce the number of suppliers to Nets Group. At the same time, we have a process for responsible procurement, asking our suppliers to sign and adhere to our Code of Conduct, while asking a selected group of suppliers to provide self-assessments, while others are controlled through on-site audits.

#### Negative impact on labour rights

There is a risk that our employees are discriminated against or are not thriving at work. Therefore, we are committed to promote a healthy work place with focus on the physical and psychological working environment. We have processes in place to follow developments closely in this area, and we also monitor employee satisfaction through the annual satisfaction survey which is conducted throughout the Nets Group

#### Risk of being associated to corruption

Nets is growing and enlarging the geographical footprint to cover more European countries, and we recognize an increasing risk of becoming exposed to corrupt activities. As a signatory to the UN Global Compact, we are committed to actively combat corruption in all its forms. We train all employees in our ethical policy and anti-bribery and corruption policy through mandatory e-learning. We run the training regularly to ensure that our employees do not become complicit in irresponsible and unethical activities. We also have a whistleblower scheme that gives our employees and external stakeholders the opportunity to report cases.

#### Misapplication of customer data

Every day, Nets processes and stores large amounts of data related to the processing of financial transactions between millions of accounts in multiple countries. We recognize the risk impact we pose to society if our core products and services are not up and running, and to bolster customer confidence and instil customer trust, we have put in place comprehensive programs to protect consumer and customer privacy and we work continuously to improve the resilience of our systems and platforms and to increase awareness on cybersecurity and information security internally and among stakeholders.

# Focus areas for 2020

Since we formalised our CSR framework in 2018 the world has developed tremendously in several areas. The Nets Group has also grown in that period and expanded to new countries and cultures. We therefore see the need to focus our CSR efforts in the following areas:

• Reviewing all our CSR policies and assess the targets for 2025

• Further strengthening our due diligence processes in our responsible procurement process

• Develop and strengthen our data collection to be able to report comprehensively on our Environmental, Social and Governance performance

• Anchor our CSR efforts internally in Nets across the enlarged Group

• Map and select the relevant UN Sustainable Development Goals that Nets will commit to contribute to 31