



# SUSTAINABILITY REPORT

Strategy for sustainable development .....	15
Focus area Environmental responsibility.....	18
Focus area Social responsibility .....	19
Focus area Governance.....	20

*When the Scottish landmark the Forth Bridge needed to be repaired and painted, HAKI Safety designed and engineered, among other things, a bespoke working platform that was integrated into two fabricated steel suspension frames that ran along the existing gantry rails.*



# HAKI SAFETY'S STRATEGY FOR SUSTAINABLE DEVELOPMENT

**Safe workplaces are at the heart of all of HAKI Safety's activities, and the Group's solutions to create safe working conditions are the result of decades of experience and knowledge.**

The Group contributes to the circular economy in that its products have long lives and are easy to recycle. New products are also compatible with older ones to minimise waste. Efficient production methods such as robotic welding make it possible to save energy, reduce waste and ensure a safer working environment.

The safety aspect applies not only to the products and solutions that the Group offers its customers, but also to the internal culture of HAKI Safety. Moreover, the Group strives to be a model of ethics in its industry.

In 2024, the Group performed a double materiality assessment in accordance with the EU Corporate Sustainability Reporting Directive. Based on the assessment, HAKI Safety will continue to develop its sustainability work and report according to the requirements.

## Basis of the Sustainability report

HAKI Safety's Sustainability report is included in the Annual Report and complies with the requirements for the statutory sustainability report prescribed in the Swedish Annual Accounts Act. The areas covered by the statutory requirements can be found in the Board of Directors' Report, see page 23. A limited assurance of HAKI Safety's Sustainability report has been performed by the Group's auditor. The auditor's report is found on page 73.

HAKI Safety's Sustainability report for 2024 covers the entire Group: the parent company and all subsidiaries unless otherwise stated. Semmco, which was acquired at the end of October 2024, is only included in the data for reported energy consumption and direct and indirect emissions and for the time it has been part of the Group, i.e. for two months. The portfolio company FAS Converting Machinery, which was divested in January 2024, is not included in the report at all. Historical data is unchanged. Social responsibility refers to own employees.

## Sustainability governance

The Board of Directors has ultimate responsibility for the Group's sustainability work. In 2024, it received regular updates on HAKI Safety's work on the double materiality assessment and also underwent sustainability training delivered by an external provider.

At Group level, sustainability work is led by a sustainability responsible who reports to the CEO and is a member of Group Management.

The sustainability responsible coordinates the Group's sustainability work and works closely with the functional organisation, in particular Procurement and Health, Safety, Quality and Environment (HSQE), and the Group functions HR and Finance. Each member of Group Management is in turn responsible for the implementation and monitoring of sustainability targets and strategies in their respective organisations. Group Management holds weekly update meetings and monthly strategy meetings. More information on corporate governance, including the composition of the Board of Directors and the Group Management, is available in the Corporate Governance report on pages 66–69.

Data included in the report is collected using various systems, mainly the Group's sustainability database (environment and energy), and global systems for HR, work-related injuries and incidents, and financial reporting. System support is also available for supplier information and evaluations.

Energy consumption data is obtained either by direct measurement of consumption or by calculations based on fuel consumption. For reporting carbon dioxide and other greenhouse gas emissions, the global Greenhouse Gas Protocol (GHG) standard and the market-based approach are used for the calculations. Emissions from transport are calculated based on the total transport work performed per mode of transport for delivered products, raw materials and inputs.

The Group's ambition is to introduce some sustainability reporting in the Group's quarterly reports in 2025.

There are currently no sustainability-related incentives in HAKI Safety's remuneration of senior executives.

HAKI Safety's sustainability work is regulated by directives and policies. The Group's Code of Conduct is the central document for how HAKI Safety's own employees and its suppliers are expected to act in different situations. Combined with the Group's sustainability policy, the Code of Conduct forms the basis of the sustainability work. These documents will both be reviewed and updated in 2025. The Board of Directors approves all directives, including the Group's Code of Conduct. Group Management approves related policies that supplement and clarify the directives. Directives and policies apply to everyone in the Group and are available to the company's employees in the Group's global HR system.

The main documents related to the Group's sustainability management in addition to the Code of Conduct are:

### Environment

» Sustainability Policy

### Social responsibility

» Global Work Environment Directive

» Global Employee Handbook

» Global Diversity, Equity & Inclusion Policy

» Global Harassment and Victimisation Policy

» Supplier qualification and evaluation process

### Governance

» Whistleblowing Policy

» Insider Policy

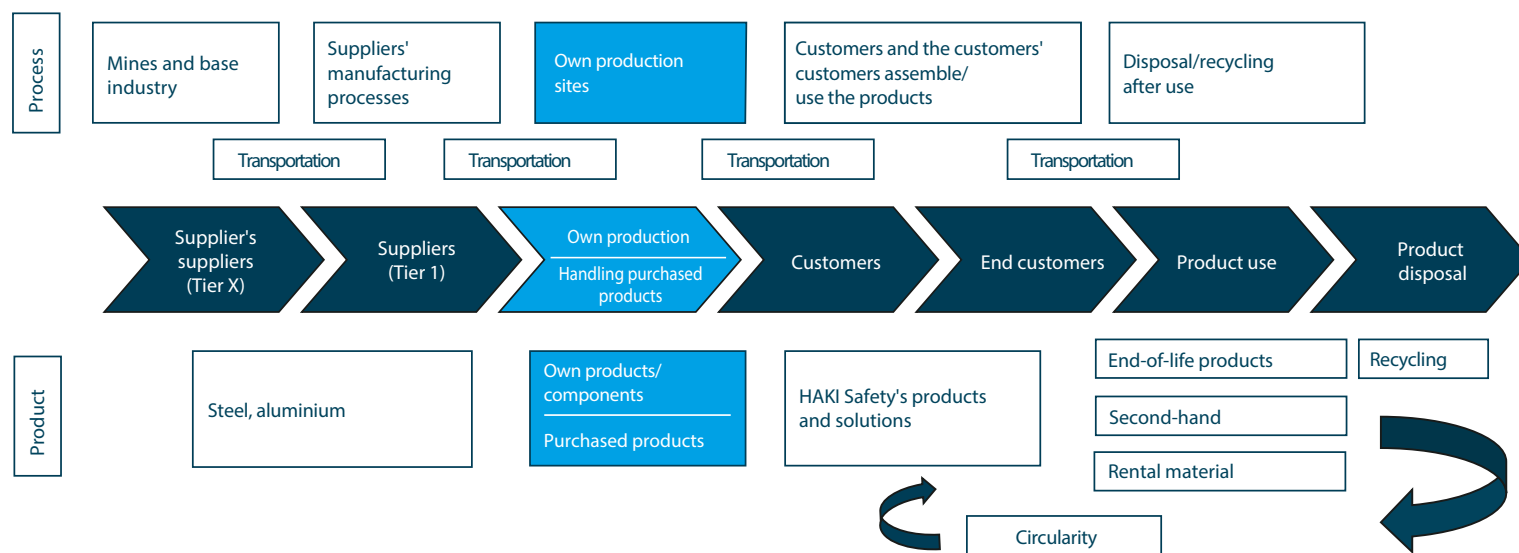
» Finance Policy (the part that is tax-related)

HAKI Safety does not have own operations in high-risk countries. Tier 1 suppliers are companies that are mainly based in the EU.

The Group's goal is for all major production units to be certified to ISO 9001 (quality) and eventually ISO 14001 (environment) and ISO 45001 (occupational health and safety).

A key aspect of HAKI Safety's risk management is about identifying and mitigating risks. The work also includes assessing potential environmental and occupational health and safety risks. Read more about the Group's risks on pages 25–26.

## SUSTAINABILITY IN THE STRATEGY, BUSINESS MODEL AND VALUE CHAIN



### Upstream activities

To ensure the supply of materials and products for its operations, HAKI Safety has two alternative suppliers (dual sourcing) for the largest purchasing categories. These are mainly steel and aluminium, which are purchased either as materials for processing or as finished products. At the top of the value chain (Tier X), therefore, is mining for the production of iron ore, followed by steel, and bauxite for the production of aluminium. The purchases (Tier 1) are made mainly from companies in the EU.

The main upstream environmental impacts are linked to biodiversity, greenhouse gas emissions and energy consumption. Social responsibility risks are mainly related to human rights and working practices (Tier X) and occupational health and safety (Tier 1).

### Own operations

In HAKI Safety's own operations, production is the most material activity. At the end of 2024, the Group had six production units which, depending on their size, have different impacts on the environment through greenhouse gas emissions and energy consumption. Two of these were added with the acquisition of Semmco at the end of October. In addition to production, there are warehousing, sales, marketing, general and administrative activities. The Group also conducts research and development to develop more sustainable new products.

At the end of 2024, the Group had around 350 employees in 10 countries. For more information about the number of employees per country, see Note 8, page 41. Social responsibility risks are mainly related to working practices and occupational health and safety.

The Group's Core Values: Safety, Customer Focus, Excellence and Trust, combined with a common Code of Conduct and corporate governance, provide the framework for operations and create a stable, responsible group.

### Downstream activities

HAKI Safety's motto is to never compromise on safety, and its vision is to create safe conditions for everyone working in challenging environments. The Group has sales in around 20 countries, mainly in Europe and North America. For more information about HAKI Safety's products and solutions, markets and customer categories, see the strategy section, pages 10–13.

Suppliers are engaged for product distribution and their activities generate greenhouse gas emissions and consume energy. The customers or customers' customers assemble and use the products in their projects for the duration of the projects. The products are long-lasting, with a service life of 15–20 years for system scaffolds, and can therefore be reused in several other projects. The environmental impact of the use of the Group's products is not significant in itself, although the context of the product may have an impact on the environment, as in the construction of new infrastructure such as bridges and tunnels. Social responsibility risks are mainly related to health and safety in terms of worksite accidents at temporary or non-stationary workplaces.

The Group's products are designed for a long service life and easy recycling. New products are also compatible with older ones to minimise waste. HAKI Safety also offers the possibility of strategic rental and purchase of second-hand products.

Stakeholder dialogue

HAKI Safety's key stakeholders include shareholders, investors, employees, customers and suppliers, as well as societal stakeholders such as public authorities, the media, researchers and students, and local stakeholders and neighbours of the production facilities. Contact and feedback from these groups helps HAKI Safety understand and manage expectations along the value chain and identify current issues. Stakeholder dialogues are ongoing.

A growing area of dialogue on the Group's sustainability is questions and surveys from customers, in many cases forwarded by third-party companies and organisations.

HAKI Safety is a member of several trade associations, including the Union of European Scaffolding Companies (UEG), the British National Access and Scaffolding Confederation (NASC), the Swedish scaffolding association Ställningsföretagen (STIB) and the Norwegian energy sector safety organisation Samarbeid for Sikkerhet (SFS). The Group is active in the public debate on safety at temporary workplaces. The focus in recent years has been to highlight the importance of planning and foresight to improve safety in an industry characterised by time pressure and short lead times. Membership should not be construed to mean that the Group endorses all actions or statements made by each organisation.

STAKEHOLDER DIALOGUE

Stakeholder group	Form of dialogue	Priority issues
INVESTORS & SHAREHOLDERS	Annual General Meeting, annual report, investor meetings and visits, capital markets day, emails and phone calls	Climate and environmental impact, business ethics
EMPLOYEES	Union-employee cooperation, performance appraisals, employee surveys, staff meetings and social events	Work environment, physical and mental health, pay and benefits
CUSTOMERS	Face-to-face customer meetings and visits, trade fairs, events, customer satisfaction surveys, websites	Compatible products, product safety, innovations, sustainable transport, waste and hazardous waste management, sustainable purchasing
SUPPLIERS	Supplier meetings and visits, emails and phone calls	Code of Conduct
SOCIETY		
Public authorities	Correspondence, local meetings/visits	Compliance with environmental and social legislation, labour law issues
Media	Press releases, emails and phone calls	Carbon footprint
Researchers and students	Email interviews	Carbon footprint, circularity
Neighbours/local associations	Emails and phone calls	Community engagement

Process to identify and manage negative and positive impacts from the company's operations and value chain

The largest portfolio company of the former Midway Holding, HAKI, has been working on sustainability-related issues for many years. The starting point was essentially system scaffolds and the impact of its production. Since the shift in strategy from the end of 2018, and subsequently the change of name from Midway Holding to HAKI Safety, several companies have been acquired that have gradually assumed HAKI's sustainability commitment, operational goals and metrics.

The Group's ambition is to introduce new sustainability targets in the areas of environmental responsibility, social responsibility and governance in 2025, the outcomes of which can be reported in the sustainability report that will be published in the 2025 Annual Report.

In 2024, the Group performed a double materiality assessment in accordance with the EU Corporate Sustainability Reporting Directive. The work was performed largely under the leadership of the Group's sustainability responsible with the functional organisation, in particular Procurement and Health, Safety, Quality and Environment (HSQE), and the Group functions HR and Finance. The Group Management was kept regularly informed about the work and actively participated in the completion of the impact assessment, the financial impact assess-

ment and the double materiality assessment. The Board was regularly informed about the process.

Based on the assessment, HAKI Safety will continue to develop its sustainability work and report according to the requirements.

# FOCUS AREA ENVIRONMENTAL RESPONSIBILITY: A PARTNER THAT TAKES AN ACTIVE ROLE IN INDUSTRY DEVELOPMENT



12 Responsible consumption and production  
Target 12.2 Sustainable use of resources  
Target 12.5 Waste management  
Target 12.6 Sustainable practices

HAKI Safety's ambition is to play an active role in the development of the industry by reducing its environmental impact and thus also becoming an attractive partner for its customers. The Group strives to reduce emissions and increase recycling through continuous innovation and optimisation of products, services and working methods. The work also focuses on efficient waste management and sustainable purchasing.

The Group contributes to the circular economy in that its products have long lives and are easy to recycle. New products are also compatible with older ones to minimise waste. Efficient production methods such as robotic welding make it possible to save energy, reduce waste and ensure a safer working environment.

### Energy and climate

The production unit in Sibbhult is the facility with the greatest environmental impact of the Group. The facility is environmentally certified to ISO 14001, which provides a clear framework for reducing the facility's environmental impact and ensuring that statutory requirements are met. The ambition is for other operations in the Group to eventually also achieve ISO 14001 certification. The production unit in Sibbhult and several of the Group's operations are ISO 9001 certified, which provides a framework for continuous improvement in the form of a quality management system.

Most of the Group's energy consumption, as well as its direct climate impact, comes from purchased ecolabelled electricity and district heating. Energy consumption in the Group increased marginally during the year. The development differed somewhat between countries depending on the type of operation and activity level during the year. Overall, higher consumption levels in some countries were balanced

by lower levels in others. The Group is actively engaged in cutting its energy consumption, and implements ongoing energy-saving measures.

Direct emissions, Scope 1, increased during the year, mainly explained by an unintentional error in reported country data for 2023 that showed lower emissions than they actually were. Adjusted for the error in 2023, the emission level in 2024 was at par with the previous year. As for energy consumption, the development differed between countries but was balanced in total. The Group's indirect emissions from sources such as purchased energy and heating, Scope 2, increased slightly during the year following the acquisition of Semmco. Data reported by

Semmco is included in the reporting of both climate emissions and energy consumption for the two months it belonged to the Group.

### Other information

The Group neither conducts any water-intensive activities nor has production units in areas of water stress. Chemicals are used in production to a limited extent and there are currently no substances of concern or very high concern in HAKI Safety's production. Scrap metal and other waste are natural parts of operations, with forging scrap being the largest category of scrap.

### OUTCOME IN THE AREA OF ENVIRONMENTAL RESPONSIBILITY

	2024	2023	2022	2021	2020
Energy consumption, kWh	2,689,306	2,578,707	3,995,377	3,782,762	3,606,279
Direct emissions – Scope 1, tonnes CO <sub>2</sub> e	650	607	377	303	268
Indirect emissions – Scope 2, tonnes CO <sub>2</sub> e	46.0	44.0	44.4	41.4	63.4

## FOCUS AREA SOCIAL RESPONSIBILITY: A LEADER IN SAFETY

**HAKI Safety's business concept is to offer products and solutions that help customers achieve safety and efficiency in their various environments. However, the safety aspect also includes HAKI Safety's internal culture, where a healthy lifestyle is promoted among all employees. The information below refers to own employees.**



3. Good health and well-being  
Target 3.4 Healthy workplace

8. Decent work and economic growth  
Target 8.8 Safe and secure working environments

### Working environment – health & safety

In 2023, accident reporting began to be categorised in a clearer new way. In addition to observations and/or near misses, incidents are reported in four different categories, ranging from minor injury to permanent injury.

The number of reported observations and incidents increased during the year, mainly owing to improved and stricter reporting. The Group's focus is to increase the number of reported observations to work preventively and thereby reduce the number of serious occupational accidents.

The number of occupational accidents resulting in absences of more than eight hours was four during the year. Two of these accidents involved hand injuries from machine work/materials handling, which led to a review and improvement of procedures to prevent recurrence.

### Performance appraisals, surveys and dialogues

The Group holds information and communication occasions with its employees at different levels and via different channels in the Group. Important such occasions are the annual performance appraisals and employee surveys.

Performance appraisals are part of the mandatory global HR process, ranging from recruitment and onboarding to offboarding and archiving of data.

The Group's employee survey is also part of the global HR process but participation is voluntary. For 2024, the response rate was 70 percent and the results showed, among other things, an eNPS (employee Net Promoter Score) of 26, which is considered to be very good. An eNPS is a measure of the employee experience at a company. The average for Nordic companies is 7.

In addition, HAKI Safety complies with local legislation and/or collective agreements where they exist and participates in the consultations that are requested in addition to the general information meetings that take place regularly.

### Training and skills development

The Group prioritises giving employees the opportunity to develop their skills. Training is organised both individually and in larger groups, based on needs identified in appraisals and surveys.

To promote a healthy lifestyle among all employees, all employees in the Group have access to a wellness allowance.

### Diversity and inclusion

HAKI Safety endeavours to achieve a mix of employees in terms gender, age and ethnicity with regard to the type of activities conducted. Diversity and inclusion are generally considered to be important elements in situations such as recruitment, training, evaluation, salary setting and succession planning.

Both the Board of Directors and Group Management comprise 40 percent women. Women make up 35 percent of the Extended Management Team, which consists of people reporting to Group Management. In the Group as a whole, the proportion of women is just over 22 percent.

### OUTCOME IN THE AREA OF SOCIAL RESPONSIBILITY

	2024	2023	2022	2021	2020
Number of occupational accidents	33	18	14	7	7
Number of occupational accidents leading to absence (8 hours or more)	4	4	5	1	2

## FOCUS AREA GOVERNANCE: A RESPONSIBLE GROUP

HAKI Safety strives to be a model of ethics and equality in its industry, and also strives to promote this in its value chain.

The Group promotes the values of fair competition and is actively engaged in combating all forms of bribery and corruption within its own organisation and value chain.

### Regulatory compliance

Based on the Group's Code of Conduct, HAKI Safety works both internally and throughout the value chain to promote exemplary business conduct based on compliance with laws, regulations and international agreements. Combined with the whistleblower policy, this constitutes an important cornerstone of the organisation's compliance.

The Group's whistleblower policy states that every employee has the right to report suspected violations of laws or regulations, harassment, safety breaches, unfairness or conflicts of interest without any repercussions. During the year, a total of one case was reported via the whistleblowing system, which, however, was dismissed for lack of relevance.

### Supplier evaluation and follow-up

The Group's goal is for all strategically important suppliers to have signed the Group's Code of Conduct, which addresses issues related to human rights, health and safety, environmental management and social responsibility. The number of strategically important suppliers totalled around 20 in 2024. At the year-end, 68 percent of these suppliers were documented as having signed the code. However, the proportion is expected to be close to 100 percent in the first quarter of 2025.

The procurement function has been largely professionalised in recent years and it deals with all aspects of purchasing, from sustainable purchasing to payment terms and call-offs.

### Human rights

Human rights relate to fundamental rights defined by conventions and declarations, including areas such as child labour, forced labour, freedom of association, discrimination/diversity, gender equality and the right to collective bargaining. These areas are addressed in the Group's Code of Conduct.

None of the Group's operations is deemed to have a significant risk of human rights violations. HAKI Safety has signed statements on the management of issues relating to forced labour, child labour and trafficking/modern slavery in accordance with the UK Modern Slavery Act and the Norwegian Transparency Act (Åpenhetsloven).

### Active role in public debate

HAKI Safety is a member of several trade associations, including the Union of European Scaffolding Companies (UEG), the British National Access and Scaffolding Confederation (NASC), the Swedish scaffolding association Ställningsföretagen (STIB) and the Norwegian energy sector safety organisation Samarbeid for Sikkerhet (SFS). The Group is active in the public debate on safety at temporary workplaces. The focus in recent years has been to highlight the importance of planning and foresight to improve safety in an industry characterised by time pressure and short lead times. These membership should however not be construed to mean that the Group endorses all actions or statements made by each organisation.

### OUTCOME IN THE AREA OF GOVERNANCE

	2024	2023	2022	2021	2020
Number of corruption-related incidents reported	0	0	0	0	0
Whistleblower cases	1 <sup>1</sup>	0	0	0	0
Number of GDPR-related incidents	1 <sup>2</sup>	2 <sup>3</sup>	0	1	2

<sup>1</sup> Dismissed for lack of relevance.

<sup>2</sup> Reported to the Swedish Authority for Privacy Protection.

<sup>3</sup> Of which one case was reported to the Swedish Authority for Privacy Protection.



5. Gender equality  
Target 5.5 Equal participation and representation

10. Reduced inequalities  
Target 10.3 Equal opportunities

16. Peace, justice and strong institutions  
Target 16.5 Eliminate corruption and bribery