



amesto
Footprint

2024

Sustainability report

SPABOGRUPPEN AS



Table of contents.

- 1. INTRODUCTION**
- 2. MANAGEMENT AND LEADERSHIP**
- 3. IMPACTS, RISKS AND OPPORTUNITIES**
- 4. ENVIRONMENTAL**
- 5. SOCIAL**
- 6. GOVERNANCE**
- 7. CONTACT INFORMATION**



1. Introduction

This chapter introduces the report's disclosures, key focus areas, organizational structure, and business model.

About Spabogruppen

Spabogruppen AS is a Norwegian family business, owned by the Spandow family, with roots dating back to 1948. We have a long-term view for our transactions, investments and decisions. Our ambition is to grow each of our companies into thriving, value-driven, and successful enterprises, guided by a triple bottom line philosophy. The owners remain actively involved in the day-to-day operations.

Spabogruppen AS is the parent company for the software and services division (Amesto Group), real estate (Spabo), and our financial growth portfolio (Amesto Beyond). Amesto Group was founded in 2002 and consists of businesses offering a range of services from accounting, payroll, integrations and sustainability, ERP-, CRM-, and BI-solutions to temporary staffing, and HR services. Spabo is a real estate company specializing in developing and management of commercial properties and apartments. Spabo owns several office buildings and apartment complexes, catering to both the corporate market and private tenants.

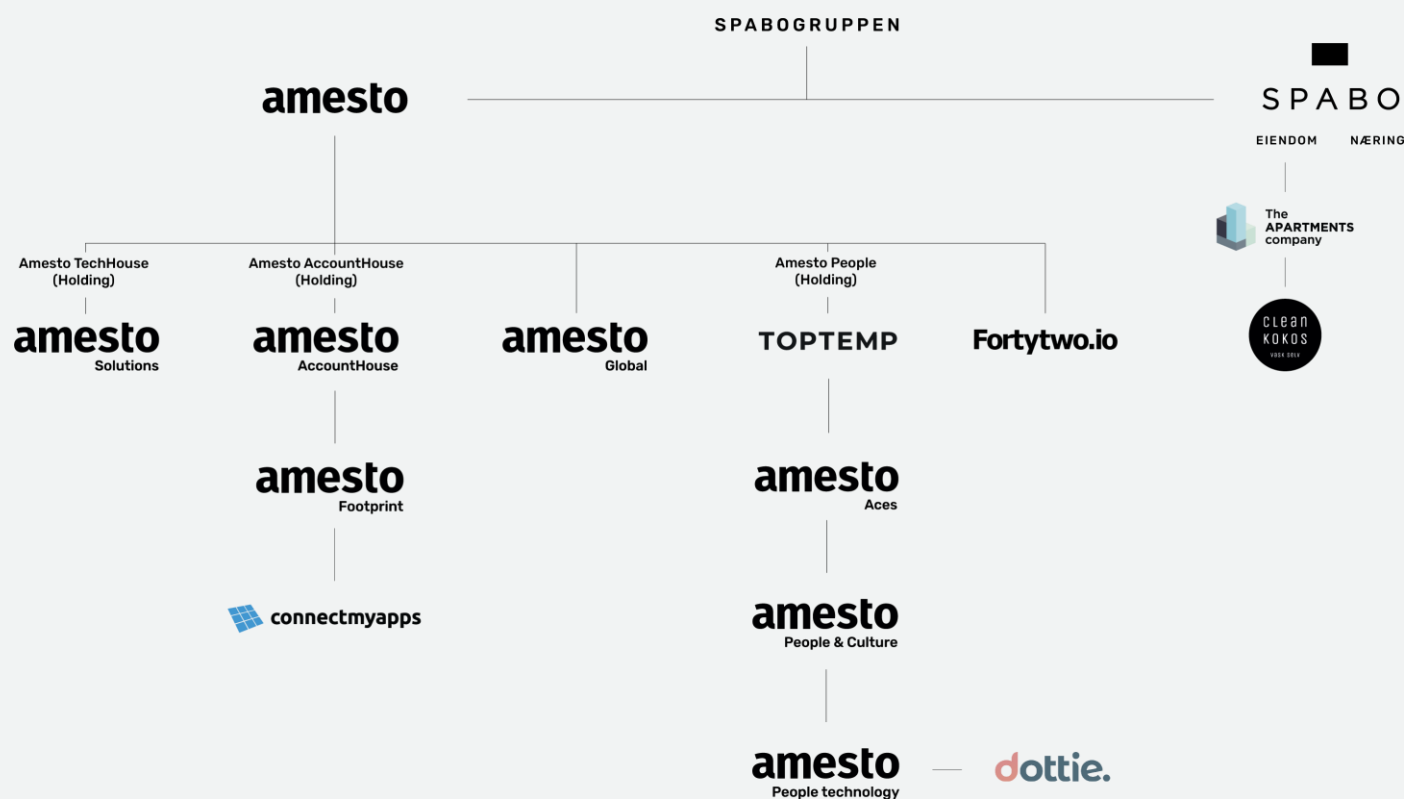
In 2024, Spabogruppen had a turnover of 1.4 billion NOK and employed more than 1.000 people. Our main office is in Oslo, Norway, with our core operations span Norway, Sweden, and Denmark. Through Amesto Global, we support the international expansion of growing companies into North America and Europe. Spabo owns and manages real estate holdings.

By integrating the triple bottom line into our business strategy, we measure performance across People, Planet, and Profit. Our approach is to actively engaging in projects and business where we can add knowledge and actions. The triple bottom line works best when we leverage our expertise to address societal challenges, big and small, while ensuring profitability.



Organizational structure

Spabogruppen AS is the parent company for Amesto Group AS and Spabo AS, and an organizational structure for the group as of 31.12.2024 can be seen below in the illustration.



COMPANIES OWNED BY AMESTO GROUP AS

- Amesto AccountHouse AS – NO 957 170 005, NACE 69.201: Accounting and bookkeeping
- Amesto TechHouse AS – NO 938 473 617, NACE 62.020: IT consulting services
- TopTemp AS – NO 987 560 274, NACE 78.200: Temporary employment agency activities
- Fortytwo Technologies AS – NO 991 450 068, NACE 62.020: IT consulting service

COMPANIES OWNED BY SPABO AS

- Spabo Eiendom AS – NO 947 843 028, NACE 68.209: Rental of real estate
- Spabo Næring AS – NO 879 749 212, NACE 68.209: Rental of real estate

About this report

This report presents Spabogruppen AS's sustainability disclosures for the financial year and is prepared using the same consolidation level as the annual financial report. This report is the second volunteer sustainability report for Spabogruppen based on the disclosure requirements in VSME (basic module), with some additions from the comprehensive module and ESRS.

The report is based on the following time frames for short, medium, and long term, where short term corresponds to one financial year, medium term spans from 2 to 5 years, and long term extends over more than 5 years.

For the first reporting year we had a pragmatic approach, as it was a voluntary reporting. The 2023 report served as a baseline or foundation for further development. In 2024, we have improved both the process, and the report itself based on what we learned from last year's process. This has helped us refine our sustainability strategy, initiatives, and action plans to be more concrete and backed by more data.

Through last year's process, we learned how much the various business models and value chains influence what becomes significant sustainability areas, prompting the implementation of two separate processes for

these group companies. This is because the nature of the businesses in the two parent companies results in distinct differences concerning relevant stakeholders and significant ESG factors.

The business unit Amesto Footprint has the responsibility for driving the sustainable agenda in the group. They lead the process to ensure the operationalization of the strategy and are responsible for coordinating and aligning the reporting for all group companies into a unified sustainability report for Spabogruppen. This includes compliance with the Transparency act, carbon accounting, and sustainability reporting.

The reporting process for the year has been led by the director of Amesto Footprint, with a dedicated project group comprising members from Amesto Footprint, cross-functional representatives from the Nordic countries, and procurement leaders from the headquarters to ensure strong alignment throughout the organization.

The project group has provided regular updates to a steering committee led by the chairman of Spabogruppen.





2. Management and Leadership

This chapter disclose information to understand the governance processes, controls and procedures put in place to monitor and manage sustainability matters.

The role of the administrative, management and supervisory bodies

GOVERNANCE STRUCTURE

The boards across Spabogruppen consists of both family representatives and external members.

- Spabogruppen: 5 men and 1 woman, with an average age of 62 years.
- Spabo AS: 3 men and 1 woman, with an average age of 61 years.
- Amesto Group AS: 3 men and 1 woman, with an average age of 63 years. Additionally, there is a female employee representative on the board.

We recognize the relatively high average age across our boards but also value the insight and experience this generation brings. The companies are in a transitional phase where the older generation is gradually stepping back, and there are ongoing discussions about the future board composition.

Within Amesto Group, the main operating subgroups are Amesto AccountHouse, Amesto TechHouse, and Amesto People, with a board composition as follows:

- Amesto AccountHouse: 2 women and 2 men
- Amesto TechHouse: 1 woman and 7 men
- Amesto People: 2 women and 2 men

Diversity enriches the workplace and directly contributes to profitability and value creation. By actively working on diversity and inclusion, we have proven a strong foundation for innovation and value creation.

Spabogruppen is continuously influencing their companies to focus on diversifying employee composition, whether it be the share of women in IT or the age span in the Accounting business. At the same time, we are also looking at how we can increase openness in other dimensions of diversity through Amesto Aces. We are proud to have a consistently growing number of women in leadership positions and an increased age span within our company. Diversity is integrated throughout the organization. Especially concerning who we hire, how we hire, and how new competencies complement existing expertise.

Sustainability-related performance

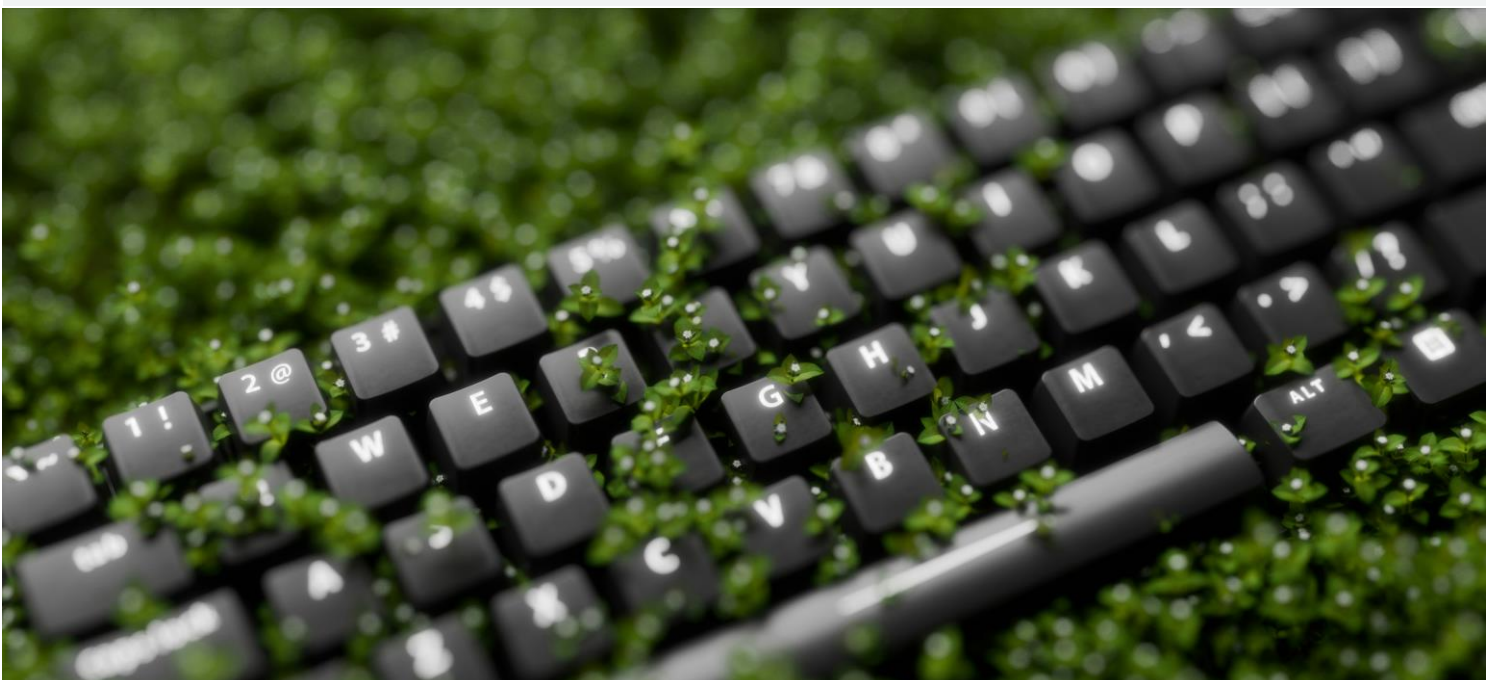
Spabogruppen is guided by a triple bottom line: People, Planet, Profit. This framework shapes strategy and business models by addressing key impacts, risks, and opportunities related to economic performance, environment, and social factors. Over recent years, the group has evolved from philanthropy to embedding sustainability in core operations, earning recognition as one of Norway's [25 most innovative companies](#)—ranked 18th in 2023–24.

All leaders, including CEOs and management teams, are evaluated on their contribution to People, Planet, and Profit. Bonus incentives are directly tied to performance across these three dimensions.

Risk management and internal controls

The companies within Spabogruppen are set to implement a more comprehensive risk management and internal control system for sustainability reporting over the period 2025–2026. In 2024, the process has primarily been overseen by an internal project group, which has provided regular updates to the steering committee. The risk assessment has been structured into a four-step strategic process, including mapping and analyzing the current situation, defining ambitions and goals, implementing the plan, and communicating, reporting, and making adjustments.

Spabogruppen's companies have developed operational goals and strategies to ensure seamless integration of material social factors, alongside considerations for climate, environment, and nature. The double materiality analysis has been conducted using a digital solution, facilitating direct dialogue and ongoing follow-up with the four primary stakeholder groups.





3. Impacts, risks and opportunities

This chapter provides insight into the process we followed to identify material impacts, risks, and opportunities. The following chapters present our key numbers, goals and actions on each of these material topics.

Process background

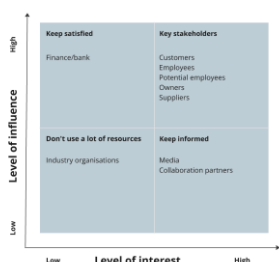
Developing effective strategies and business models requires a clear understanding of Spabogruppen's priorities, impacts, risks, opportunities, and stakeholder expectations.

In 2023/2024, we conducted a structured 8-step double materiality assessment, starting with stakeholder mapping and ESG impact analysis. Each phase was reviewed with the steering group and led to the identification of five material sustainability themes.

The assessment covered both primary and secondary stakeholders, evaluating how they influence or are influenced by Spabogruppen's activities. For a full methodology, see the 2023 sustainability report. A process summary is provided below, with the seven material ESG factors presented on the next page.

Phase 1

Understand the impact in the value chain and relevant stakeholders



Phase 2

Create a gross list of ESG topics through stakeholder dialogue

Company	Environment	Climate	People
Arctic supplier	A good environment that respects the good of surrounding	Physical climate work	Waste and digital pollution
Professional supplier	A job that gives meaning	Family vision and values	Social responsibility
Company they identify with	A job that gives meaning	Family vision and values	Social responsibility
High quality	A job that gives meaning	Family vision and values	Social responsibility
Operates within laws and regulations	Work-life balance	Leading in sustainability reporting	Low air pollution
Resource efficient solutions	A good working environment	A good reputation	Water consumption
Lower emissions than their industry average	Diversity and inclusion	Operational growth	Research and sharing culture (circular economy)
Sustainable as a competitive advantage	Fair pay and rewards	Innovation accelerator through employees	Creating and maintaining good working conditions
Solutions that provide high financial value	The company's climate ambition	Operates within laws and regulations	Operates within laws and regulations
Energy efficiency	No greenhouse gas emissions	Solutions that provide high financial value	Community contributions through loans and fees
Climate change adaptation	Development opportunities for all	Research and sharing culture (circular economy)	Community contributions through loans and fees
Reduce emissions	Facilitation for activities and good health	Responsible investments	
High customer satisfaction	High job attendance	Responsible investments	
	Low turnover	Responsible investments	

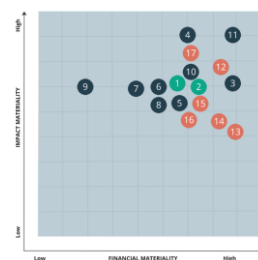
Phase 3

Assess and highlight the most significant ESG topics according to scale

Scale	Severity	Scope	Irreversibility	Probability
5	Critical	Community	Irreversible	Very Likely
4	High	Value chain	Long-term actions	Likely
3	Medium	Medium	Medium Actions	An opportunity
2	Low	Business	Own Effort	Unlikely
1	Minimal	Limited	Simple Actions	Unlikely

Phase 4

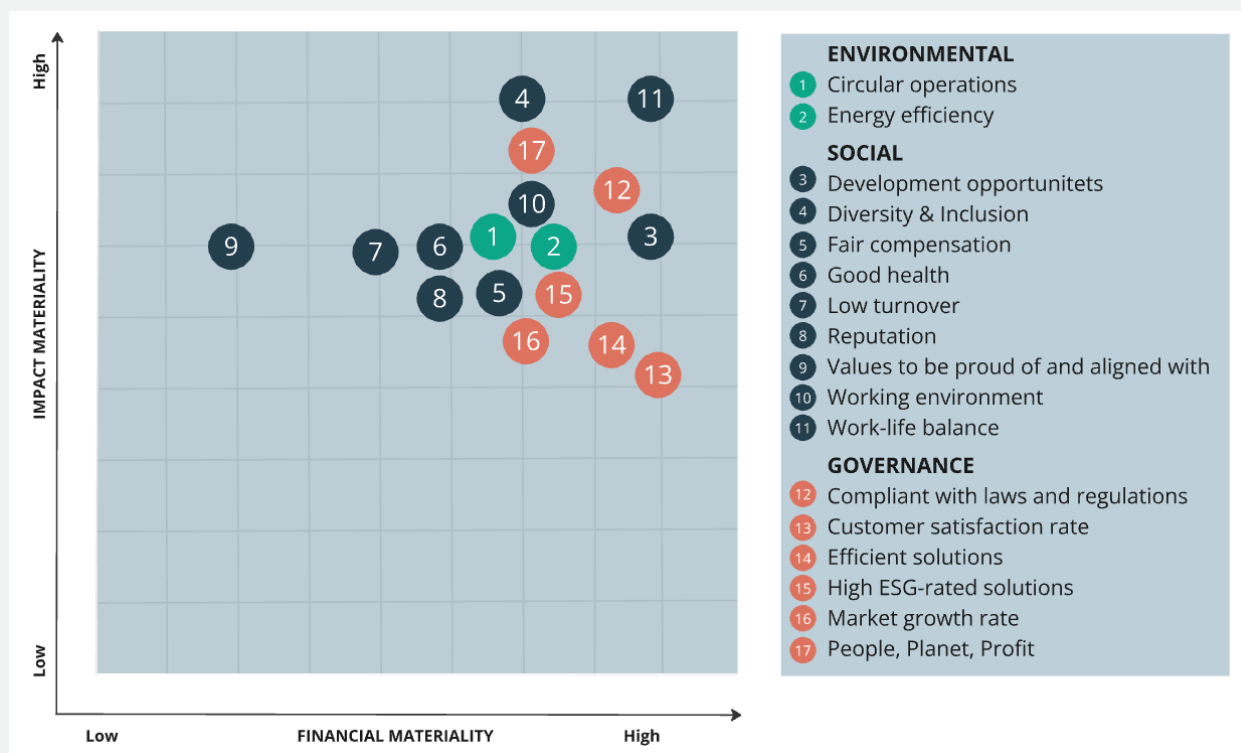
Double materiality matrix and results



Material impacts, risks and opportunities

THE GROSS LIST OF ESG FACTORS

The gross list of ESG factors from the double materiality analysis conducted and reported last year.



MATERIAL ESG TOPICS

The material ESG factors for Spabogruppen are outlined following the ESRS topics.

Environmental		Social		Governance	
ESRS E1	Climate change	ESRS S1	Own workforce	ESRS G1	Business conduct
ESRS E2	Pollution	ESRS S2	Workers in the value chain		
ESRS E3	Water & marine resources	ESRS S3	Affected communities		
ESRS E4	Biodiversity & ecosystems	ESRS S4	Consumer & end-users		
ESRS E5	Resource use & circular economy				

Material ESG matters

The double materiality assessment identified several ESG factors as material for Spabogruppen, with Social/People-related topics emerging as the most significant. These are relevant for both our own employees and those within our value chain. Many of these themes align with the Transparency Act and the Activity and Reporting Duty (ARP).

In addition, measures on energy efficiency and greenhouse gas emissions is a great focus and have already been implemented in both Spabo AS and Amesto Group AS, with results documented in each company's carbon accounting report.

All group companies will integrate the material ESG factors into their strategies and outline specific actions during the second half of 2025.

Environmental

ESRS E1 Climate change

We will use our climate accounting as guidance to cut our GHG emissions. This include actions regarding energy use and efficiency.

ESRS E5 Resource use & circular economy

We will use circular operations for our IT equipment.

Social

ESRS S1 Own workforce

Good working environment
Diversity and inclusion
Development opportunities
Ensure work – life balance

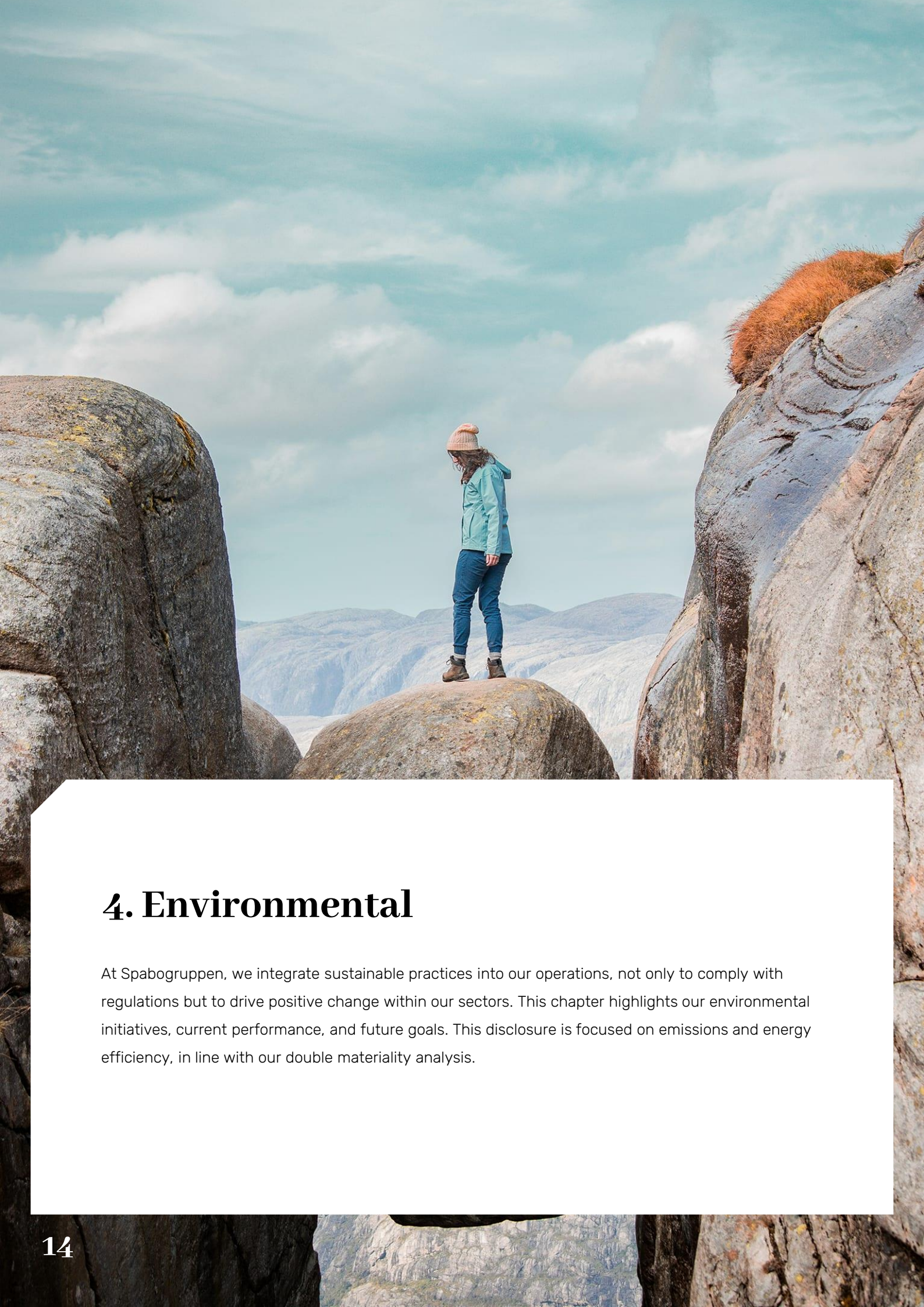
ESRS S2 Workers in the value chain

Good working environment
Diversity and inclusion

Governance

ESRS G1 Business conduct

Triple bottom line
Excellence governance in it
security and accounting quality



4. Environmental

At Spabogruppen, we integrate sustainable practices into our operations, not only to comply with regulations but to drive positive change within our sectors. This chapter highlights our environmental initiatives, current performance, and future goals. This disclosure is focused on emissions and energy efficiency, in line with our double materiality analysis.



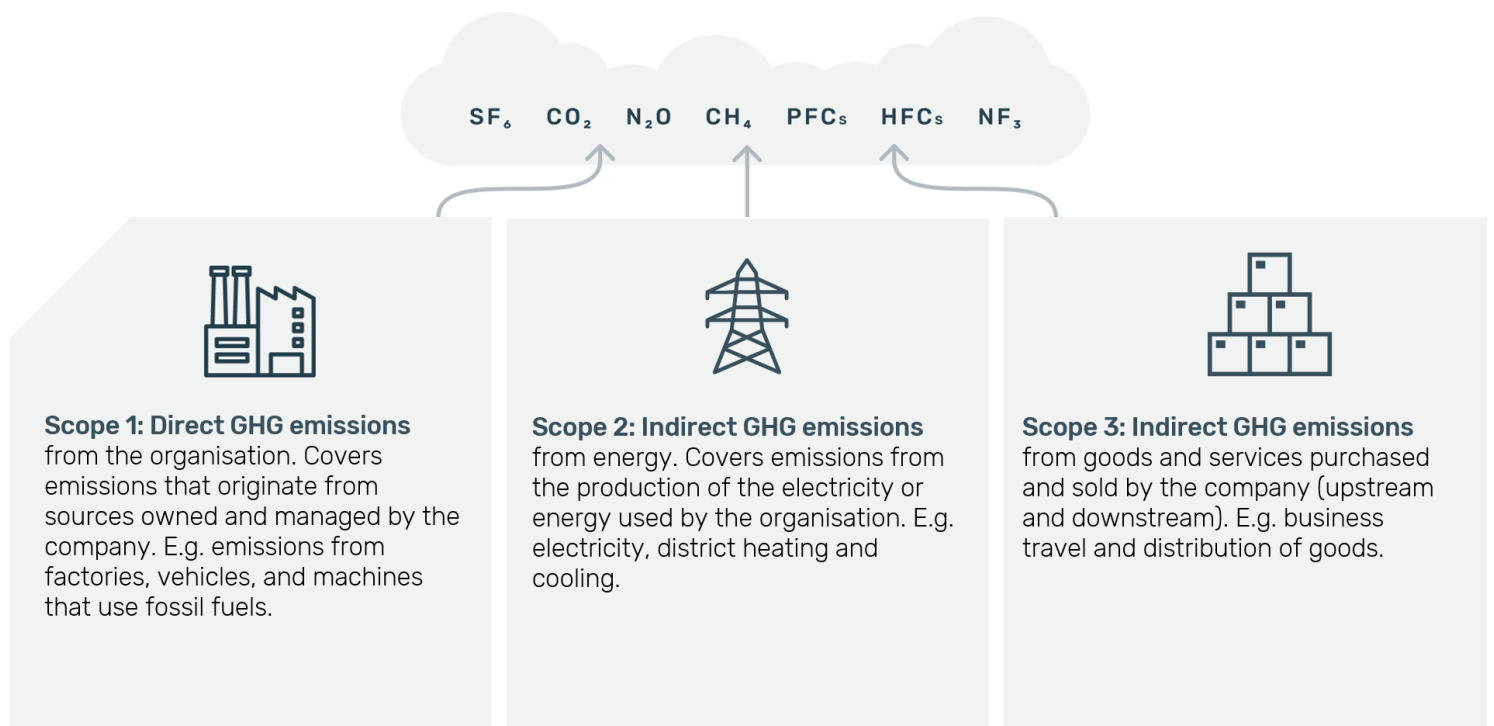
4.1 Carbon accounting for 2024

Below, we present our calculated carbon footprint, offering a comprehensive overview of the group's emission trends, along with a breakdown between the subgroups Amesto Group AS and Spabo AS.

Carbon accounting principles

Our carbon accounting report is developed in accordance with the standards and methodology established by the Greenhouse Gas Protocol ([GHG-protocol](#)). This is the most recognized standard for measuring and reporting greenhouse gas emissions (GHG emissions) from businesses and organizations.

This standard ensures that our reporting is reliable, relevant, transparent, complete, and comparable. According to the framework, GHG emissions are categorized into three levels (scopes):



Method

Our carbon accounting report provides a comprehensive overview of greenhouse gas (GHG) emissions associated with our operations, quantified in carbon dioxide equivalents (ton CO₂-e). 1 ton of CO₂-e is equivalent to driving 6,000 km in a diesel car.

Built on our financial reporting, a spend-based method is utilized to establish a complete overview over the impact of our business activities. By aligning closely with the financial reporting, our climate accounting ensures a structured and transparent approach to tracking emissions. The year 2023 is defined as our baseline year for measuring and comparing emissions over time. We aim to reduce emissions in line with the goals of the Paris Agreement. Over the past two years, our efforts have focused on data collection and quality assurance to support the development of a realistic emission reduction plan backed by concrete actions.

Footnotes

1. We have based the carbon accounting on the consolidated income statements of Spabo and Amesto Group. This means all internal transactions between subsidiaries have been eliminated from the calculation basis. To obtain a more accurate picture of emissions from Spabo's core operations, we have estimated emissions based on capitalized amounts in the balance sheet.
2. The emission calculations are based on an operational control approach. As a result, emissions associated with, for example, The Apartments Company, are not included. Furthermore, taxes, interest, salary payments, and employee commuting are excluded from the calculations.
3. The report shows zero tCO₂-e under Scope 1. This is due to the level of consolidation in the financial statements, whereby energy consumption related to Spabo AS's company vehicles is reported under business travel. The vehicle fleet consists of one diesel car, while the rest are electric vehicles.
4. Scope 2 emissions are calculated using a location-based method that reflects the national energy mix as reported by NVE. While Spabo AS holds guarantees of origin for its property portfolio, these have not been included in the calculations.
5. For purchased goods and services, emissions are calculated up to the point of receipt and include the impact from transport and distribution earlier in the value chain.
6. Most upstream transportation and distribution emissions are included under the categories "purchased goods and services" and "capital goods," as these transport costs are often not invoiced separately (estimated at 95%). When transport costs are invoiced separately (e.g., freight or postage), they are accounted for under "upstream transportation and distribution".
7. The spend-based emission factors are primarily sourced from the [EXIOBASE](#) database, which is built on a multi-regional input-output (MRIO) analysis. Emissions are calculated up to the point of receipt. The emission calculations are further adjusted for inflation, currency exchange rates, GDP growth rates, and national emissions reporting to ensure comparability over time, taking into account both economic and environmental changes. In addition, a limited number of factors are calculated using detailed economic and research data.

Overview of 2024



0,0

SCOPE 1
tCO₂-e



227,3

SCOPE 2
tCO₂-e



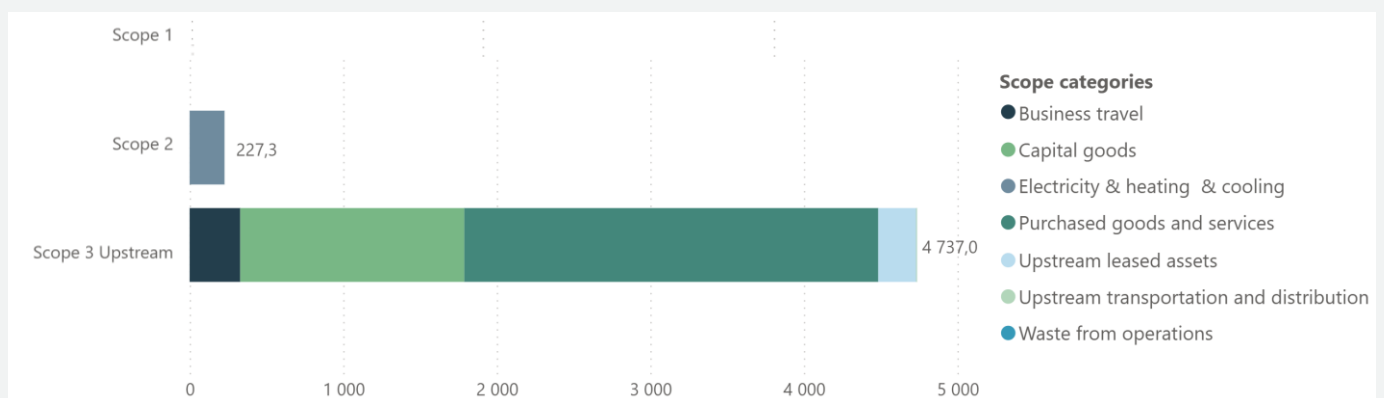
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SCOPE 3
tCO₂-e

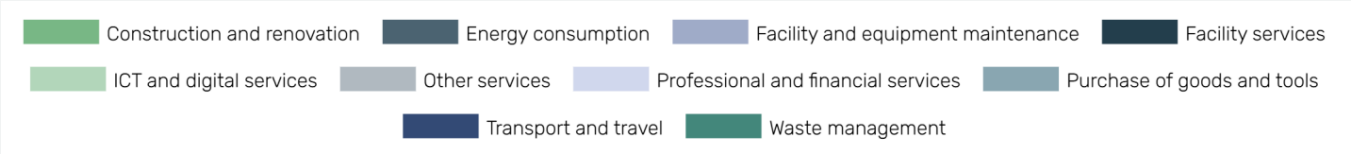
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TOTAL EMISSIONS
tCO₂-e

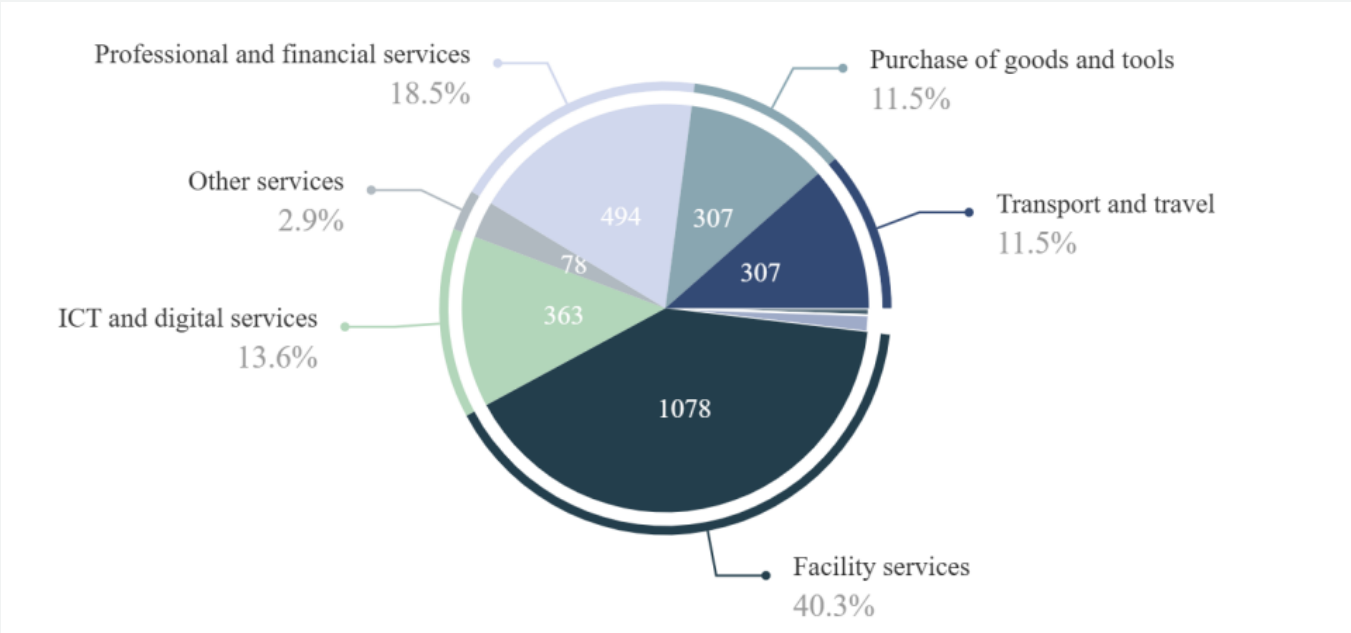
Total emission numbers for Spabogruppen (tCO₂-e)



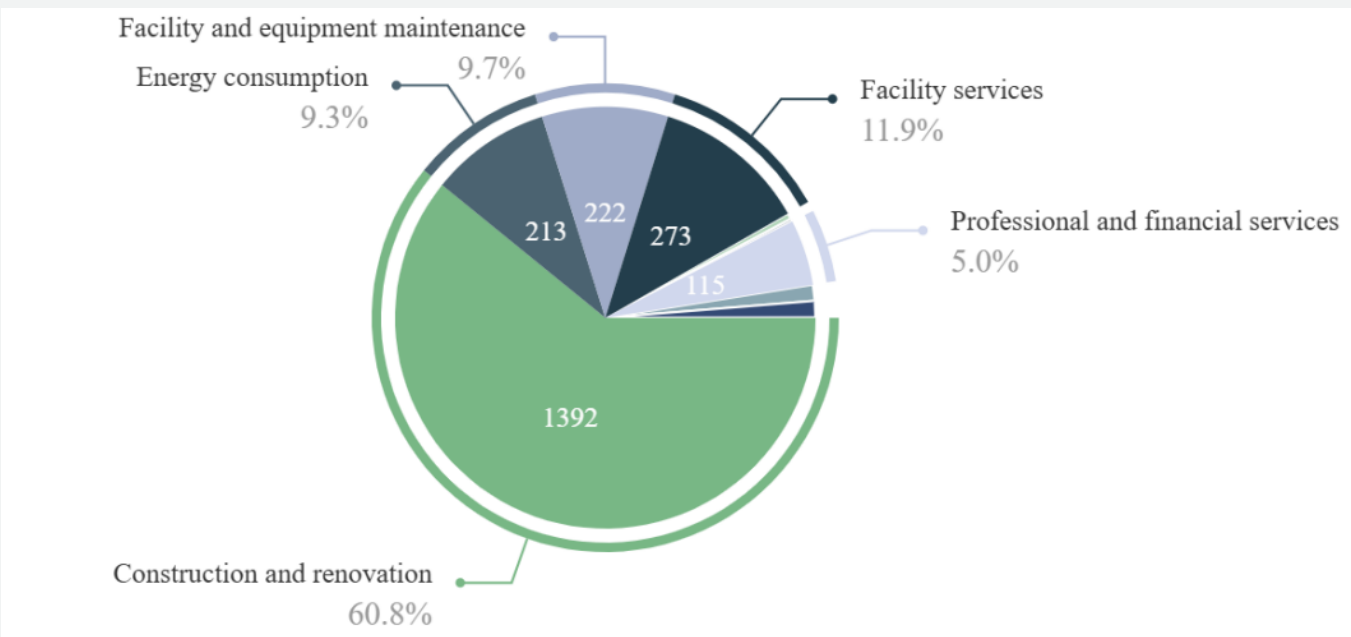
Detailed overview of 2024



Emissions overview for Amesto Group AS (tCO2-e)

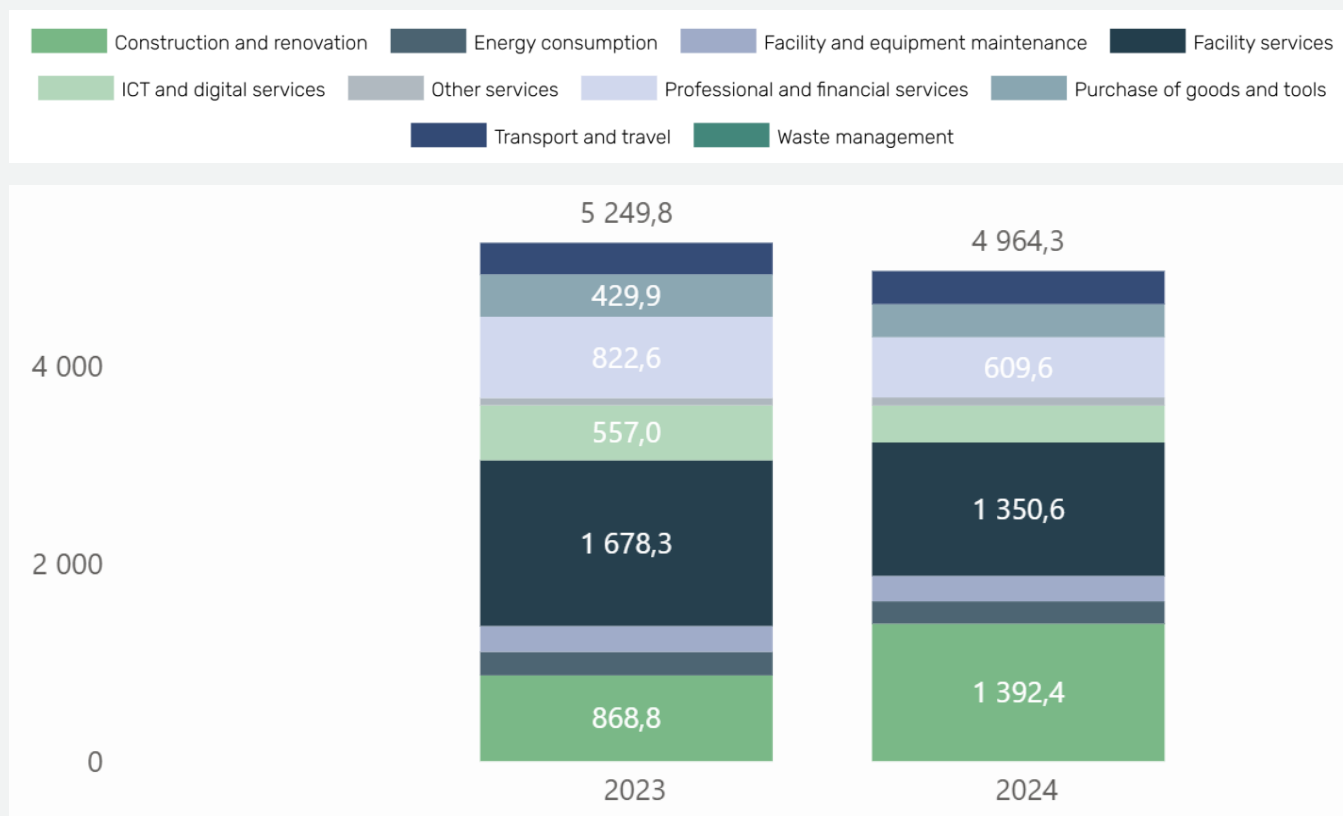


Emissions overview for Spabo AS (tCO2-e)



Emissions trend for Spabogruppen

Total emissions by activity grouping (tCO2-e)



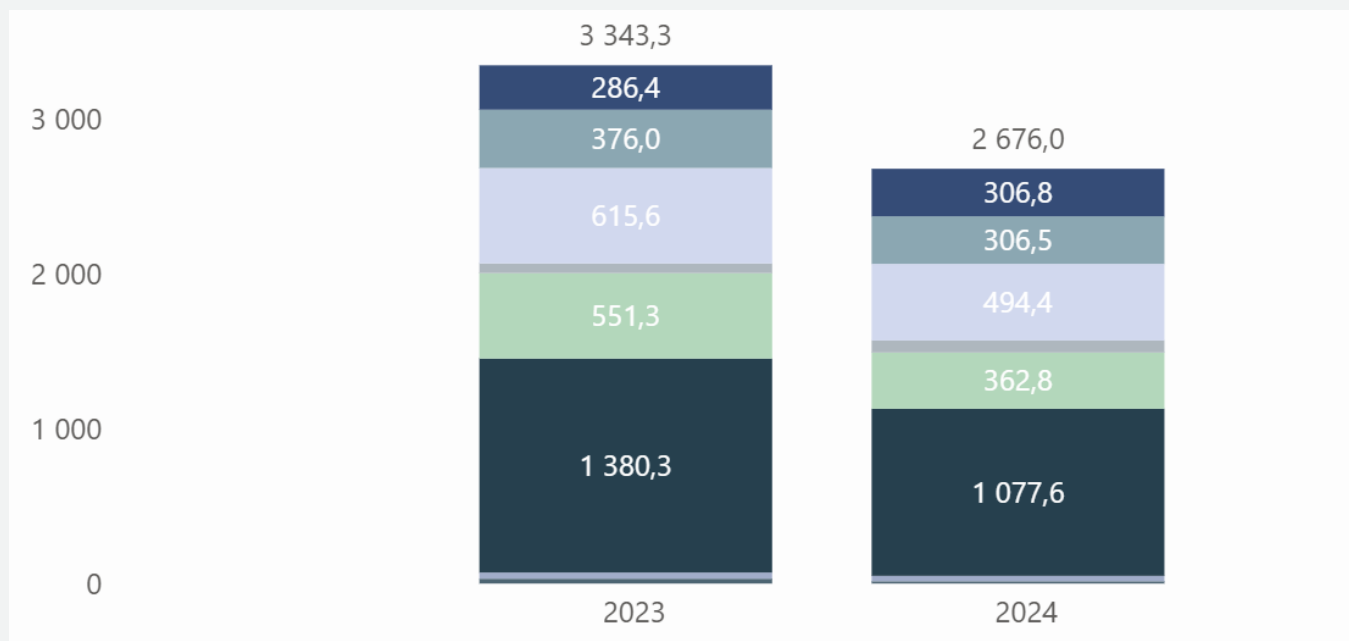
Total emissions by scope grouping (tCO2-e)

Scopes	2023	2024
Scope 3 Upstream	5,010.8	4,737.0
Purchased goods and services	3,260.8	2,695.8
Capital goods	1,144.1	1,459.1
Business travel	313.5	329.6
Upstream leased assets	286.2	245.8
Upstream transportation and distribution	5.9	6.3
Waste from operations	0.3	0.4
Scope 2	239.0	227.3
Electricity & heating & cooling	239.0	227.3
Total	5,249.8	4,964.3

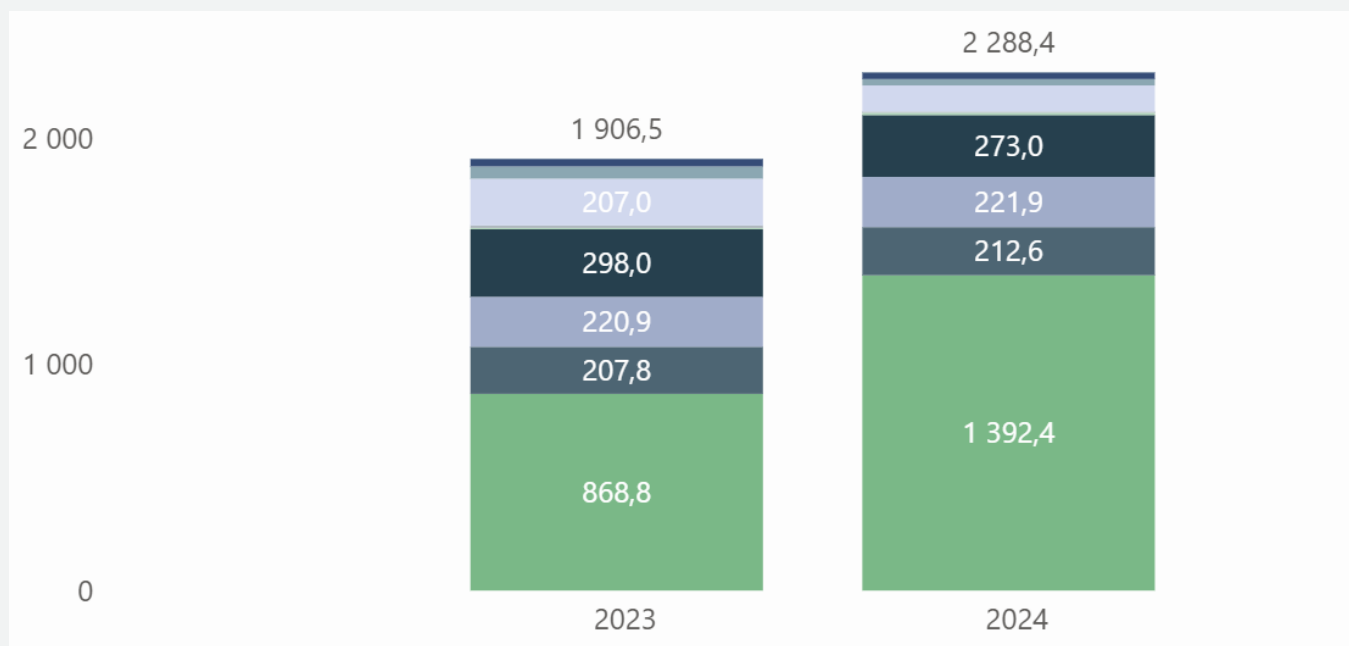
Trend by subgroups



Emissions trend for Amesto Group AS (tCO₂-e)



Emissions trend for Spabo AS (tCO₂-e)



Key initiatives

Our carbon accounting shows that the group's main climate impacts come from purchased goods and services, capital goods, business travel, and energy use—typical for a service-based group with property operations. From 2023 to 2024, total emissions were reduced by 5.4%.

Further, the group had a CAPRO (carbon productivity) of 0,76 in 2023, and 0,86 in 2024.

We continue to focus on emission reductions in areas within our control and are currently mapping targeted measures across all business units in the group.





4.2 Energy efficiency

For Spabogruppen, the adoption and implementation of energy-saving measures are critical steps toward enhancing our sustainability performance and reducing overall energy consumption. As a company that leases and manages commercial properties, reducing energy use through targeted measures and improving energy performance certifications remain top priorities.

Energy consumption

We work systematically to improve energy efficiency and reduce overall energy consumption. The table below presents energy usage data for the past two years.

Indicator	Unit	2023	2024	%-change
Purchased electricity, main office	MWh/year	156,78	158,46	1,1 %
Purchased electricity, Spabo properties	MWh/year	1.469,11	1.404,76	-4,4 %
Portion invoiced to Oslo Municipality*	MWh/year	361,41	319,84	-11,5 %
Total electricity consumption	MWh/year	1.625,89	1.563,22	-3,9 %
Total electricity consumption (excl. Oslo Municipality)	MWh/year	1.264,48	1.243,39	-1,7 %

*There is a single electricity meter in the offices at Markveien 57, and the energy consumption is fully re-invoiced to Oslo Municipality. This re-invoiced share is shown in row three of the table, while the last row reflects total electricity consumption excluding Markveien 57.

Data on energy consumption for the main office in Smeltedigelen 1, has been retrieved from our reported numbers in VENI Energy Group, whilst the reported number on Spabo properties has been retrieved through NOOVA Energy Systems.

The electricity mix at the main office mirrors Norway's national energy profile. Spabo AS holds guarantees of origin for renewable energy across its entire property portfolio.



Key energy efficiency initiatives

Key measures implemented or in progress during the reporting period to improve energy efficiency and reduce energy consumption:

1. Securing guarantees of origin for electricity consumption across the property portfolio.
2. Energy labeling of all commercial buildings.
3. Installation of geothermal heating at the central control system in Hansteensgate 5 in 2023.
4. Installation of solar panels at the Bjørnerudveien 14, which is leased to Amundsen Bryggeri. The system can generate up to 255,000 kWh per year and improved the building's energy rating from E to C.
5. Completion of the rehabilitation project at Hagegata 32, which was certified as a BREEAM-NOR "Very Good" project. The entire building is leased to Oslo Municipality and is known as "Tøynehelsa 32."
6. Transitioned to electric vehicles – only one diesel company vehicle remains.
7. Another key initiative to reduce energy consumption is the replacement of windows and roofing for better insulation.
8. Additionally, we have enhanced energy efficiency in waste management and recycling projects.

The table below provides an overview of the impact of selected measures mentioned above, in addition to some planned measures:

Location	Energy grade 2012/13	Energy grade 2022/23	Energy- saving initiatives
Hansteensgate 5, Oslo	-	F	Installation of geothermal heating at the central control system in 2023
Hagegata 32, Oslo	D	B	Completed rehabilitation of building, BREEAM-NOR «very good»
Schleppegrellsgate 14, Oslo	-	E	Heat pump installment in spring 2024
Nordre gate 18, Oslo	-	C	Installation of district heating in 2023/2024
Bjørnerudveien 14, Oslo	-	G	Establishing solar panels 2023/24, generate up to 255.000 kWh per year
Brenneriveien 5, Oslo	F	E	Window replacement in the extension (planned for 2024/2025)
Brenneriveien 5, Oslo	F	E	Window replacement in the extension (planned for 2024/2025)
Østerdalsgata 7A, Oslo	E	D	Planned revitalization 2025 following the relocation of the new school
Østerdalsgata 7A, Oslo	E	D	Planned revitalization 2025 following the relocation of the new school



5. Social

The social dimension of ESG factors is pivotal in shaping the relationship and impact that businesses have on their stakeholders, communities, and the broader society. This dimension has been focused on in every aspect of Spabogruppens work.

At Spabogruppen, we understand the importance of cultivating a diverse and inclusive workplace, ensuring employee well-being, and actively contributing to the communities in which we operate. Our initiatives focus on promoting a healthy work-life balance, enhancing employee engagement and aligning our goals with our stakeholders.

Through this chapter, we will provide an overview of our social policies, the measures we have implemented to create a supportive work environment and our ongoing efforts to engage with key stakeholders. We believe that by prioritizing the social aspects of our operations, we can build stronger relationships and contribute to a more equitable and sustainable society.

5.1 Own Workforce

General characteristics of our workforce. The number of employees are headcounts per 31.12.2024.

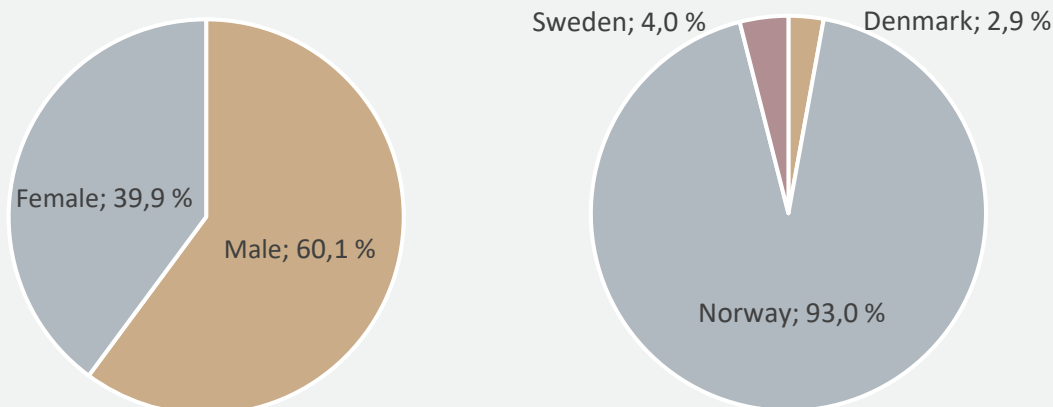
Parameters	Indicators		Comments
Total number of employees	1.187		TopTemp AS have 623 employees via their employment agency services.
Type of contract	97 % (permanent)	2,7 % (temporary)	
Employees by gender	39,9 % (female)	60,1 % (male)	
Gender diversity	1,8		Gender diversity = number of female managers / number of male managers
Annual training hours per employee	37 hours		Data is general average, both female and male training hours
Sick leave	5,15%		Sickness absence rate
Employee turnover	14%		Employees via TopTemp's agency activities are excluded from this number.
Parental leave*	20 (female)	15 (male)	Number of employees with parental leave during reporting period. Employees via TopTemp's agency activities are excluded from this number.

*During parental leave Spabogruppen covers the difference between full pay and 6G during the leave. Holiday pay is based on full pay throughout the entire parental leave period. In connection with childbirth, the father/co-mother is entitled to two weeks of leave to assist the mother during childbirth/return-to-home.

Spabogruppen is dedicated to continuously evaluate our practices to ensure an inclusive workplace where all employees have equal opportunities and can thrive. We will continue to uphold transparency and adhere to the principles of equality and diversity in all aspects of our operations.

5.1 Own Workforce

SPABOGRUPPEN EMPLOYEES BY GENDER AND MAIN LOCATIONS



AMESTO ACCOUNTHOUSE EMPLOYEE DATA

eNPS

eNPS stands for Employee Net Promoter Score. It's a metric used to measure employee loyalty and engagement, similar to the Relational Net Promoter Score (rNPS) which gauges customer loyalty.

Target score for 2024: 30. Actual score by Q4 2024: 35

Training initiative

The physical, mental and psychosocial are connected. By incorporating regular exercise and physical activity into a structured follow-up system, we strengthen our efforts in preventive healthcare. Exercise and physical activity provide a number of health benefits on both physical and mental health, and therefore a particularly good "tool" and method for both prevention and repair.

In addition to the health-promoting effect of exercise, the follow-up highlights a holistic team effort by cheering on and motivating each other.

Participants record their activities in an app that awards points for each session, encouraging consistency and engagement. In 2024, we achieved the following results:

1. 75% of the total employees have contributed to the training program, receiving points for themselves and their teams. The average monthly participant rate was 45%.
2. The average per participant ended at 769 points and 15 hours 10 minutes of recorded activity per month.
3. A total of 10,110 sessions, 10,811 hours and 24,342 kilometers of activity were recorded.
4. Walking was the most popular form of exercise, with 2970 sessions, followed by running and strength training.

5.2 Workers in the value chain

We are committed to running our business in a way that ensures decent working condition and fundamental human rights, both within our own operations and throughout our supply chain.

At the Group level, we initiated a revision of our Code of Conduct and Supplier Code of Conduct. The updated Code of Conduct has now been implemented, and this work will continue into the next reporting period.

All group companies* within Spabogruppen report in accordance with the requirements of the Norwegian Transparency Act. In this context, thorough due diligence has been carried out on each company's value chain, in alignment with the OECD Guidelines for Multinational Enterprises.

Throughout 2024, the various companies within the Spabogruppen have conducted due diligence assessments of suppliers and partners and have followed up on potential risks that had been previously identified. These assessments have been carried out in a structured manner, evaluating suppliers based on country-, industry-, and product risk. Suppliers with a total risk score above the defined threshold were subject to further investigation and follow-up. This included evaluations of their sustainability practices and ethical guidelines.

Further information about the Transparency Act, the results of our assessments, and measures taken can be found in our [reports](#). Separate reports are available for Amesto Group AS and Spabo AS, as well as a summary report covering Spabogruppen as a whole, in compliance with legal requirements.

Based on these efforts, it is reasonable to conclude that our sustainability reporting addresses the companies' upstream value chains. Going forward, the due diligence process will be expanded to include climate, environmental, and nature-related impacts when the Corporate Sustainability Due Diligence Directive (CSDDD) is incorporated into Norwegian law.

*TopTemp AS has not followed the group process for the Transparency Act and will report through a separate process.





6. Governance

Effective governance is essential to ensuring transparency, accountability, and ethical decision-making across all companies in Spabogruppen. This chapter outlines the governance framework that supports responsible business conduct and long-term value creation.

At Spabogruppen, we are committed to strong corporate governance through clear policies, a well-defined board structure, proactive risk management, and active stakeholder engagement. These practices help build trust, uphold integrity, and ensure alignment with our sustainability goals and regulatory obligations.

6.1 Compliance with law and regulations

In Spabogruppen, the responsibility for managing sustainability matters lies with the Board of Directors. Together with the management team, the Board oversees the implementation of relevant sustainability policies and ensures compliance across the organization.

Spabogruppen is certified under the ECO-Lighthouse and has been a member of the UN Global Compact since 2012. Our workforce-related policies are aligned with internationally recognized standards, including the UN Guiding Principles on Business and Human Rights.

We have established processes to monitor compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. These also encompass the principles set out in the International Bill of Human Rights and the eight fundamental conventions defined in the ILO Declaration on Fundamental Principles and Rights at Work.

Spabogruppen has a well-developed HR function that prioritizes immediate follow-up in response to any employee-related issues. A key part of this function is a robust complaints-handling mechanism designed to address potential violations of the standards within our own workforce. No violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration, or the OECD Guidelines have been registered in relation to our workforce during the reporting year.

As one of the fifteen largest accounting firms in Norway, Amesto AccountHouse AS maintains a high standard of regulatory compliance, particularly with respect to financial and accounting legislation, including anti-money laundering regulations and quality control procedures. These actions are important contributors to ensure high ethical standards among our client base.



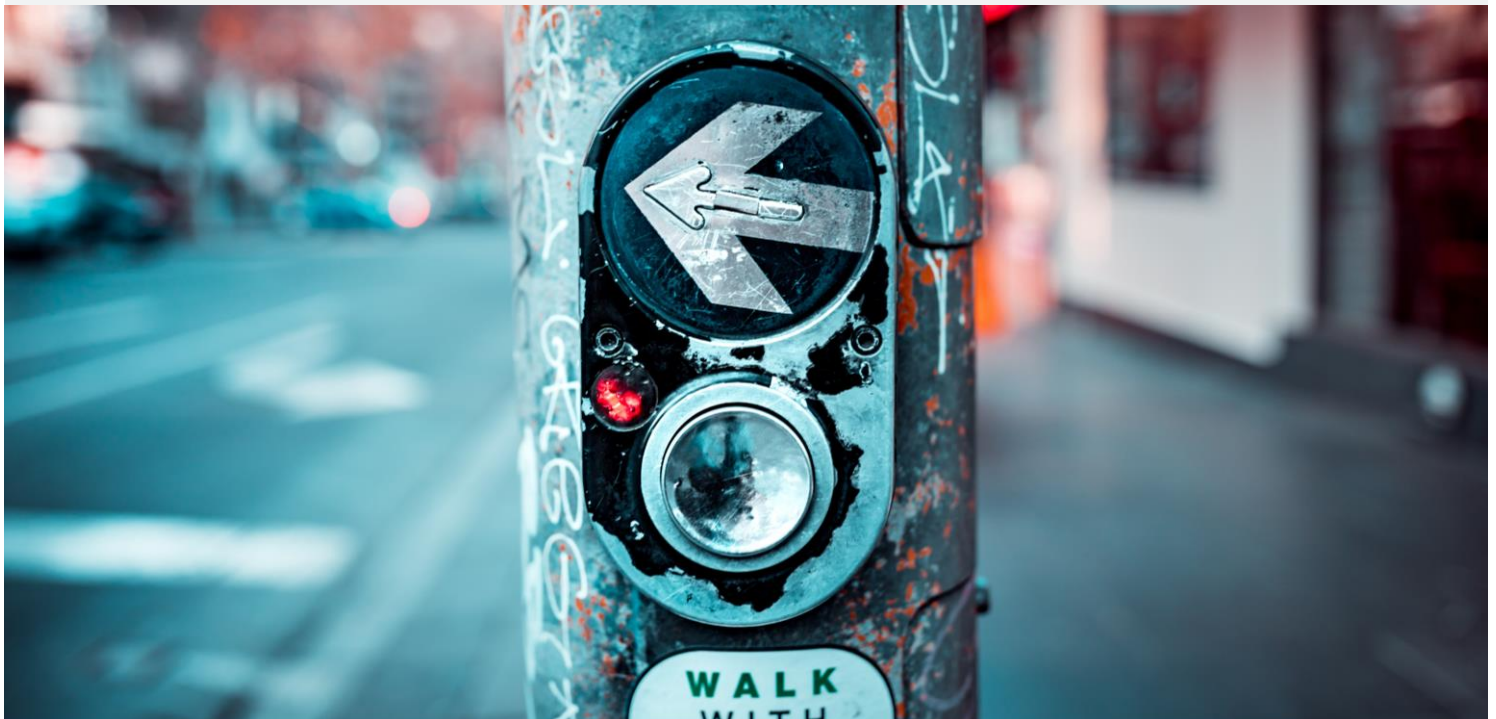
6.2 Tripple bottom line

We aim to generate value across all three dimensions to help address pressing societal and environmental challenges. For over a decade, we have embraced an approach aligning economic success with positive social and environmental impact. This commitment is reflected in our ethical guidelines, which focus on human rights, health and safety, the environment, and anti-corruption.

Our policies are rooted in key international frameworks, including the UN Declaration of Human Rights, ILO Core Conventions, and OECD Guidelines for Multinational Enterprises. As a member of the UN Global Compact, we uphold its ten principles on human rights, labor, the environment, and anti-corruption. By embedding these standards into our operations, we aim to create long-term competitive advantage while contributing to sustainable and inclusive communities.

Here are some examples of our actions:

- **Amesto Footprint:** Consulting services and software solutions for sustainable business development and reporting. Amesto Footprint assists mid-sized companies in accelerating their sustainability performance. Their goal is to support organizations in their sustainability initiatives and contribute to a more environmentally friendly future.
- **Amesto Aces:** A program aimed at creating opportunities where others see challenges. Amesto Aces empowers young individuals who have fallen out of the workforce by offering a 16-week training program for certification as Salesforce and Microsoft resources with real work experience. Through Amesto Aces, we have contributed to providing training and engagement opportunities for a group of young individuals who were outside the workforce, leading to permanent jobs. In 2023, 30 individuals were given the opportunity to participate in the training program by Amesto Aces. Of these, 11 individuals secured jobs in IT, 8 others found employment in different industries, and 11 dropped out during the period. Therefore, after completing the course, 63.3% of participants ended up with employment.
- **ConnectMyApps:** Developing an AI-powered HR assistant that connects the HR systems and data sources. This helps HR teams save time while gaining real-time insights across the entire employee lifecycle and collect data for social sustainability development.





7. Contact information

Spabogruppen would love to hear from you, and we appreciate your feedback on the sustainability report. Please reach out to us if you would like to know more about how we work with sustainability in Spabogruppen.

Christine Lundberg Larsen, Managing Director Amesto Footprint

footprint@amesto.no



Accounting for accountability.

The quality of the sustainability report is ensured by Amesto Footprint.