

A person with long brown hair in a ponytail, wearing large white headphones and a grey sweater, is seen from behind, looking out over a vast, green, hilly landscape under a cloudy sky. The person is standing on a grassy ridge, looking towards a distant mountain peak.

Sustainability report 2020

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Celebrating 25 years of innovative change

For Komplett, celebrating 25 years of operation is quite a milestone. We have created a business model that is viable in the long run. This is a testament to the pioneering spirit and innovative power in Komplett.

Since the beginning, Komplett has taken an active approach to digital transformation and embraced it as the core of our business model. We have been willing to make changes and try new concepts and solutions and will continue to evolve in the future. Our ability to evolve is the main reason why Komplett has become as successful as we are today.

We pride ourselves in being a cornerstone in our community in Sandefjord. The municipality, the people and the businesses have come together to create an entrepreneurial environment that enhances collaboration. We see many positive effects of collaboration, such as finding partners for creating innovative solutions for a circular economy. There is no need to look for partners outside of Norway when you can find them right on the other side of the street.

A CHALLENGING YEAR

2020 has been a turbulent year, with large fluctuations in demand, unusual currency volatility, and product shortages being some of Komplett's largest challenges. At the same time, we have seen some large new contracts that have challenged our capacity to deliver and pushed us to become more efficient than before.

We have been tested as an organisation, and – I believe – we have come out stronger. Reviewing the year 2020, we see that many new customers have joined Komplett. Our employees have done an amazing job to meet the challenges, care for each other, and provide a service of high quality to our increasing customer base. I am proud of our organisation's efforts throughout 2020. We have focused on recognizing each other, our diverse challenges with working from home, as well as maintaining infection control in our warehouses.

In 2020 we have also found ways to engage our customer base and contribute to support vulnerable groups in society. I especially want to mention the "Gamers against cancer" community fundraiser that we carried out together with the Childhood Cancer Society. In 2021, we will continue working on ways to enhance digital inclusion in society.

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” 2020 was a year where we were reminded that we, as a society, are dependent on a well-functioning ecosystem. During the year, we have developed our first sustainability strategy and have launched initiatives that have brought us closer to our vision of being the obvious choice.

OUR STRATEGY TOWARDS 2025

2020 was a year where we were reminded that we, as a society, are dependent on a well-functioning ecosystem. During the year, we have developed our first sustainability strategy and have launched initiatives that have brought us closer to our vision of being the obvious choice.

Sustainability is a must for Komplett. As part of society, it is fundamental that businesses are part of the transformation and needed innovation. For us, working towards sustainability is both the right thing to do from a moral standpoint and from a business point of view.

Our experience is that our customers increasingly demand sustainable products and services and emphasize this in their interactions with us. We are happy to acknowledge this development and aim to meet the challenge. I think sustainability is becoming a natural part of the way we do business.

We will use our inherent ability to innovate as a means to transform our business and provide new solutions towards a circular economy. Komplett will take action to become a part of the solution, and together with our partners, work towards achieving the Sustainable Development Goals.

CIRCULAR ECONOMY

There exists an untapped potential in finding new business models in line with a sustainable transformation of society. 2020 has already seen the launch of some circular concepts such as buy-backs and leasing of products at Komplett. In the coming years, we will continue to provide our customers with new experiences and services that meet their demand and our ambitions for sustainable solutions.

This year we will start building a value chain to implement circular economy into our products and services. Our ambition is to provide solutions so that our customers can use the products in a sustainable way that extends the products lifetime, and dispose of them in a manner that enables reuse and recycling. This will be a win-win-win situation for our business, customers and the environment.

Our vision is to be the obvious choice for our customers, employees, the community around us and for investors.



A handwritten signature in black ink, reading "Lars Olav Olausen".

LARS OLAV OLAUSSEN
CEO

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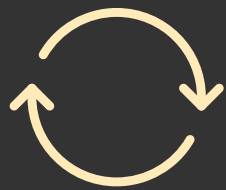
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Komplett's Sustainability performance at a glance



656

Total number
of employees



2,15%

Return rate



2 835

tonnes CO₂e

GHG emissions

3,6 million

Number of orders

9,9 billion

Revenue

Diversity

25 %
Women



75 %
Men

34 years

Average age

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About the report

The purpose of this report is to give our stakeholders a comprehensive summary of our activities within, and approach towards, sustainability. Here we present Komplett’s most material sustainability topics and our efforts within these areas in 2020. The identified material topics are integrated in our three main paths for sustainability.

The report covers activities within our wholly owned subsidiaries in Norway and Sweden. The content is primarily oriented around Komplett’s goals related to our three sustainability pillars *Komplett Circular*, *Komplett Tolerance* and *Komplett Environment*, in addition to material topics identified in our stakeholder dialogue and materiality assessment.

The information in this report is based on internal initiatives and data gathered from different parts of the Komplett group and from different data sources. Although much emphasis has been placed on ensuring that the data is complete and correct, some of the information may be subject to some uncertainty.

This is Komplett’s second sustainability report and reflects the increased focus on sustainability in our company and in society as a whole.

SUSTAINABLE DEVELOPMENT GOALS

In 2020 we developed our first sustainability strategy in order to integrate sustainability into our business operations. In 2021 we will take our work even further and include sustainability as one of the main pillars in our 2025 business strategy. The SDGs outline the common challenges that face society. Komplett Group wants to be a part of the solution, and we therefore use the SDGs as a framework when choosing our main sustainability areas.

REPORTING FRAMEWORK

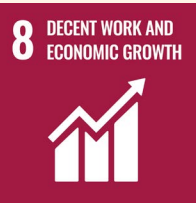
We have prepared this report in accordance with the Global Reporting Initiative (GRI) Standards: Core option. The GRI index at the end of this report provides an overview of disclosures according to the GRI Standards, including references to where in the report information related to each of the disclosures can be found.

As part of our work on this report, we have also used the WEF initiative’s indicators for sustainability reporting as inspiration, and we strive to follow the Euronext guidance on ESG reporting lauched in January 2020.

Through our sustainability initiatives we strive to contribute to five of the SDGs:



SDG 5
Gender equality



SDG 8
Decent work and economic growth



SDG 10
Reduced inequalities



SDG 12
Responsible consumption and production



SDG 13
Climate action

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About Komplet

Komplett Group is a leading online electronics actor in Scandinavia, offering one of the market's broadest selection of consumer electronics and business solutions. Our business solutions include sales to public and private enterprises, large and small, as well as wholesales to retailers.

Komplett is fully owned by Canica, one of the largest privately-owned investment companies in Norway. Canica's operations are focused on active, long-term ownership, seeking to always create value through excellence. As a committed owner, Canica is passionate about their brands, employees, sustainability and the community around them.

We are fortunate to have an owner that sets high and clear environmental, social and governance (ESG) expectations for the companies they invest in. These expectations are integrated into our guidelines and principles where they form the basis for responsible and sustainable management in the Komplett Group. In 2021 we will continue to further develop and report on our actions and results within our sustainability strategy and take sustainability at Komplett to new heights by integrating it into our overall 2025 business strategy.



The Komplett Group, headquartered in Sandefjord, Norway and Stockholm, Sweden, is organised in three divisions: B2C, B2B and Distribution.

B2C is serving the consumer market with two brands, Komplett and Webhallen. Komplett is represented in Norway, Sweden and Denmark, while Webhallen is purely based in Sweden. Due to the centralisation of the customer care and market functions to the Sandefjord headquarter in Norway, the office in Gotenbourg (Komplett Sweden AB) was closed down in 2020.

Komplett is a pure e-commerce player, while Webhallen is a multi-channel with a combination of e-commerce and physical stores. In 2020, we had a total of 130 million visitors on our eight webstores in Norway, Denmark and Sweden.

130 million

In 2020, we had a total of 130 million visitors on our eight webstores in Norway, Denmark and Sweden.

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Our stores are:

- + komplett.no
- + komplett.se
- + komplett.dk
- + komplettbedrift.no
- + Komplettdforetag.se
- + itegra.no
- + itegra.se
- + webhallen.com
- + 20 Webhallen stores



In 2021 we will continue to further develop and report on our actions and results within our sustainability strategy and take sustainability at Komplett to new heights by integrating it into our overall 2025 business strategy.

Komplett is serving the SME business market with the brands Komplett bedrift and Komplett foretag for Norway and Sweden, respectively. The head office is in Sandefjord, Norway, while the Swedish business has a separate sales management in Stockholm, Sweden. The latter was established during 2020 and is showing very good progress. The Group is also active within the distribution market, both in Norway and in Sweden, through its Itegra brand. However, the Norwegian business is significantly larger than the Swedish and holds substantial agreements with big brands.

ELECTRONIC PRODUCTS

Komplett Group is a leading player on e-commerce of electronic products in the Nordic region, offering one of the market's broadest selection of consumer electronics and business solutions.

Our range comprises more than 35 000 products, including the latest computer components, PCs, household electronics and other computer-related products. We feature the main brands, carry the latest products and make it easy for our customers to compare prices and models.

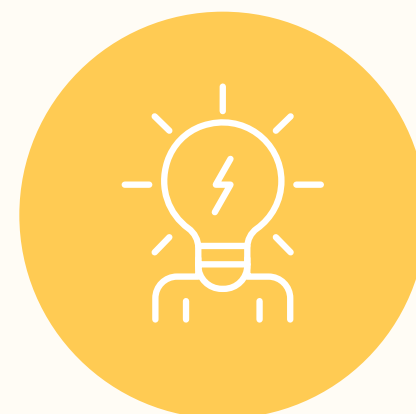
We assemble close to 40 000 PCs every year, where each model is tailored to customer specifications and provide the latest technologies. The various webstores allow customers to choose their own components using the on-line Komplett PC builder.

At the end of 2020, the seven webstores had a total base of 3,6 million orders. The group sales surpassed more than NOK 9,9 billion NOK to end-users, businesses, schools, public enterprises and wholesalers across Scandinavia. This is an increase of 31% from 2019. The company positions itself as the direct link between manufactures and customers, providing efficient operations and highly competitive prices. In 2020 we delivered a product to our customers every 4 seconds.

MEMBERSHIPS AND INITIATIVES

In Norway we work together with our partner, Norsirk, on the topic of Extended Producer Responsibility (ERP). Norsirk works to develop new methods of reclaiming electronics and to keep products in the loop. We engage in external initiatives related to our employees and improving people's possibilities to enter the workforce in Norway. Komplett has been a signatory to the two-party agreement on inclusive employment ("Inkluderende arbeidsliv") related to skills, employment and inclusion, since 2007. We also have a close cooperation with the Norwegian Directorate of Labour and Welfare (NAV) regarding on-the-job training and other measures to help job seekers obtain the qualifications they need to find and hold a job. Komplett is also a member of occupational health service through Bedrifts-Helsen AS and provides health insurance for its employees.

Vision, mission, values



Vision

Our vision, «***the obvious choice***» expresses how the Komplett Group would like to be perceived and where we are heading. Our vision provides guidance and energy.

Each and every day, we strive to be «***the obvious choice***» for customers, suppliers, employees and society.



Mission

To develop complete solutions that ***make life simpler***.



Values

Our values are fundamental to our corporate culture. Our values tell us how to work, how to treat each other and, not least, how we are perceived by the world around us.

PRECISION. Keep our promises, meet deadlines, keep up, be clear and accurate. Have respect for and confidence in each other.

SIMPLICITY. Think smart, find simple solutions. Make life easier for our customers and ourselves.

ENTHUSIASM. Get involved and wish each other well. Create enthusiasm and get pleasure from your work.

Executive management team



Lars Olav Olaussen
Group CEO



Kjetil Wisløff
C&B



Per Skøien
C&B



Martin Klafstad
B2C



Stian Gabrielsen
B2B



Henri Blomqvist
Webhallen



Trine-Lise Jensen
COO/CIO



Krister Pedersen
CFO



Kristoffer G. Langballe
Group Strategy



Hanne E. Hagen
HR



Kristin Hovland
Communications

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Our new strategy – enjoyable product life cycles

In 2020 Komplet Group has gone through a strategy process to identify the most important areas for the company in the coming years. This includes engagement with our stakeholders, identifying important areas for Komplet Group, and prioritisation of strategic goals.

We have redefined the very purpose of our company: we will deliver enjoyable product life cycles.

STRATEGY

Through the process in 2020, we have defined a new sustainability strategy based on the principle of Enjoyable Product Lifecycles. **This strategy includes three main paths:**

- + Komplet Tolerance: Take care of our people
 - employees, customers and suppliers
- + Komplet Circular: Contribute to a circular economy
- + Komplet Environment: Reduce our emissions

That means developing new, circular, business concepts and constantly working to increase the durability and reusability of everything we sell. You should expect our products to last longer, be easier to repair, and a higher proportion recycled in 2030 compared to 2020. Longer guarantees, upgrade solutions, buy-backs and leasing and more convenient recycling solutions are all among the remedies we envision.



Reducing our own carbon footprint is another goal for Komplet Group – indeed, something we are committed to through environmental programs and ISO certifications. Defining a long term emission reductions strategy is part of our 2021 agenda. To this end, we keep contributing to the development of more efficient packaging and intend to offer zero-emission deliveries to all customers by 2026. Komplet Group will make a difference every day by guiding our customers towards the more environmentally conscious products on our shelves.

Lastly, in order to create sustainable workplaces where employees from a wide range of backgrounds thrive and develop, we are committed to inclusiveness throughout the organisation. Particularly, we want to take an ever more prominent leadership position in the work against forced social exclusion in the digital space.

We are also consistently working to improve our interaction and feedback to suppliers, particularly in parts of the world where significant risk exists for both workers' rights and human rights violations.

It's all part of the pledge we have made to make the consumer electronics business better for the planet and future generations. This report sorts our most important topics, as identified through our stakeholder engagement, under the three strategic pathways; Komplet Tolerance, Komplet Circular and Komplet Environment.

Through the process in 2020, we have defined a new sustainability strategy based on the principle of Enjoyable Product Lifecycles.

This strategy includes three main paths:

- + **Komplet Tolerance**
Take care of our people: employees, customers and suppliers
- + **Komplet Circular**
Contribute to a circular economy
- + **Komplet Environment**
Reduce our emissions

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Stakeholder engagement

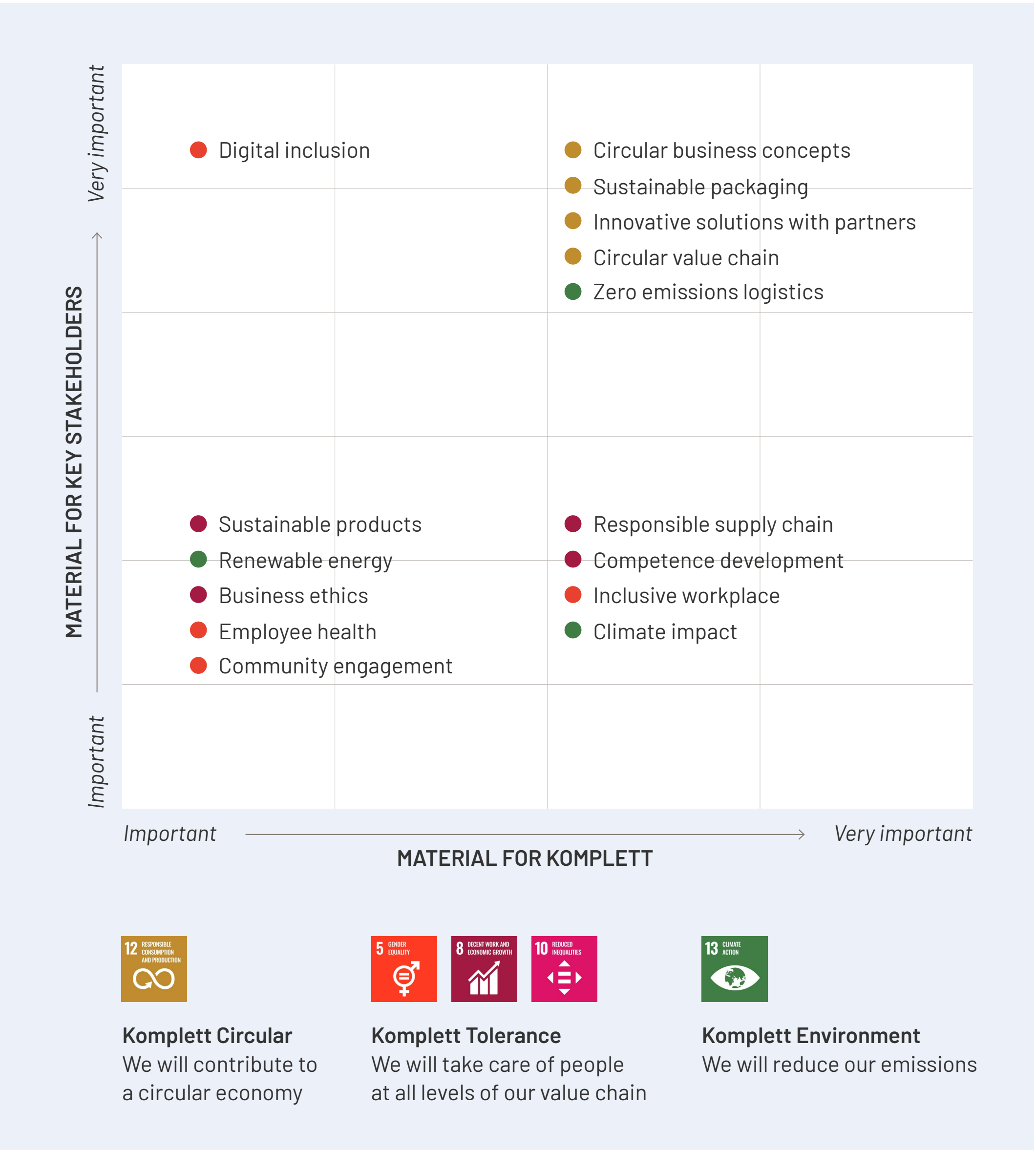
At Komplet্ট we aim to have an open and honest dialogue and interaction with our stakeholders through day-to-day interactions, customer surveys, employee surveys, social media or other platforms.

Our key stakeholders are:

- + Owners
- + Employees
- + Customers
- + Suppliers
- + Community
- + Governments

MATERIAL TOPICS

In 2020 we conducted an internal assessment based upon input from key internal stakeholders and management, and presented the outcome to our board. However, to confirm that this was in line with best practice, we engaged a specialist sustainability consultancy to assist us: the work involved an assessment of macro trends, as well as a benchmark against peers and leaders. Of outmost importance to us in the embarkment of this engagement, was to confirm that we are in fact aligned with the expectations of our external stakeholders. The findings from the project were first systematised, and subsequently discussed and prioritised in several workshops with our management and the board. The resulting material topics are provided in the matrix provided on this page to the left.



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In general, consumers value and expect circular services such as reparation and reusing of materials.

The process includes engagement with our stakeholders, identifying important areas for Komplet, and prioritisation of strategic goals. The topics in the top right corner are those identified as the most strategically important.

In the following sections, we discuss each of these areas in relation to our work in 2020 and our ambitions and initiatives for the coming years. As some of the material topics are new to the strategy, the implementation of monitoring and management activities has not been completed during 2020.

INCREASED CONSUMER AWARENESS

In 2020, we received valuable insight into our customers' perspective from our partner SB Insight. The statistics show that the importance of sustainability is already on a high level in Sweden and is increasing among Norwegian consumers. They perceive the impact of sustainability on

their purchasing decisions for electronics as quite high – on the same level as for purchasing energy, travel and hotel stays.

It is clear that both Norwegian and Swedish consumers prioritise environmental issues, especially issues relating to climate change and circular economy. Younger and more progressive consumers value both environmental issues and social issues, such as decent working conditions in production countries and the avoidance of using conflict minerals.

In general, consumers value and expect circular services such as reparation and reusing of materials. All aspects of a circular economy are not yet in demand (co-owning/sharing is still considered less attractive) but consumer trends tell us that circularity as a concept will soon be the norm.



The circular activities that consumers engage in the most and are most positive towards are those of recycling, repairing and selling of used products. For Nordic consumers, recycling is very much a part of their identity. For activities such as repairing and selling used products, the main reasons for participating is to save or make money, and to gain positive feelings from taking environmental responsibility. The main obstacles for partaking in circular activities are time and energy, high prices (reparation) and lack of knowledge of where to do conduct the activities.

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Sustainability governance

The CEO is responsible for the company’s business development, as well as leading and coordinating day-to-day operations in accordance with the Board of Directors’ instructions and decisions.

The strategy for Komplett is decided by the BoD and is reviewed at the Board of Directors’ meetings. It is the CEO and the group management who are responsible to act on the strategy decided by the BoD. All divisions in Komplett Group are represented in the group management, and all divisions have their own local management.

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Group policies

Several group policies are available on company intranet sites, including Guidelines for Delegation of Authorities, the Employee Handbook (including country-specific versions), Ethical and Harassment guidelines, GDPR policy, and more.

In addition, each department and subsidiary within the group has established relevant management systems and processes, according to local legislation and practice.

The precautionary approach was introduced by the United Nations in Principle 15 of The Rio Declaration on Environment and Development. Applying the precautionary principle can help an organisation to reduce or to avoid negative impacts on the environment.

The principle connects environmental protection with a cost-benefit analysis and attempts to achieve a balance between ecology and economy.

Komplett Group operates within well-known standards for quality and environmental management and are certified according to ISO 9001 and ISO 14001.

There are routines for reporting and handling of unwanted events or emergencies. These routines include defined reporting guidelines to top management together with the creation of a separate emergency group.

RISK MANAGEMENT

Risk management is a part of the annual steering wheel for Komplett Group. The purpose is to identify and document the most important risk areas that can potentially threaten the business, its goals and its objectives. The risk assessments are conducted on group level, including risk exposures for all business units. Key risk areas identified and mitigating actions are reported and discussed annually with the Board of Directors.

The main risk areas identified in the 2020 risk assessment for Komplett were competition and market conditions, operational risks such as interruptions in supply chain operations, cyber security, financial risks and sustainability risks. The identified risks will be followed up with mitigation actions on regular basis, and the risk assessment will be reviewed in 2021.

Privacy and data protection

Privacy and data protection laws protect the integrity and confidentiality of a person's private information. We are committed to protecting the privacy rights of our employees and everyone with whom we do business, including our customers. We will only use personal data for appropriate purposes, and personal data will be processed in accordance with binding rules for processing of personal data. The way by which we use data includes well-established routines and processes for fulfilling the requirements set forth by the EU General Data Regulation (GDPR) that went into effect in 2018.

In 2020 we had no substantiated complaints concerning breach of customer privacy or loss of data.



The principle connects environmental protection with a cost-benefit analysis and attempts to achieve a balance between ecology and economy.

Ethical business conduct

ANTI-CORRUPTION

Komplett Group must comply with all anti-corruption laws and regulations and take active steps to ensure that corruption does not occur in relation to our business activities.

Transparency is vital in fighting corruption. We are committed to conducting our business activities in an open and transparent manner, subsequently supporting efforts to fight corruption worldwide.

Corruption includes bribery and trading in influence. Corruption undermines legitimate business activities, distorts competition, ruins reputations and exposes companies and individuals to risk. We include guidance on anti-corruption in our employee ethical guidelines, and any violations of these can lead to termination of employment.

If employees become aware of possible violations of laws and regulations or possible violations of Komplett’s corporate social responsibility policy, employees are

asked to report these in accordance with adopted whistle-blower routines. The employee reporting the violation can choose to notify anonymously. Alerts are protected from retaliation.

Komplett has not had any confirmed or reported cases of corruption in 2020. We started work on developing new manuals and training programs for anti-corruption in 2020 and will continue to develop this initiative and roll out the program to our employees during 2021.

ANTI-COMPETITIVE BEHAVIOUR

In 2020, Komplett has developed a manual with guidelines on anti-competitive behaviour. This manual will be rolled out throughout the organisation in 2021, and relevant personnel will receive training on the topic.

Komplett has not had any confirmed or reported cases or legal action for anti-competitive behaviour, anti-trust or monopoly practices in 2020.



Komplett’s Governance action plan



Action	Timeline	Status
Update anti-trust manual, anti-corruption manual and Code of Conduct	2021	Ongoing
Launch training sessions in business ethics for all employees	2021	To be implemented

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Our people are front and centre of our newly established sustainability strategy, specified through the strategic principle KompletTolerance. In KompletT, our employees form the basis for our success. We are an organisation in constant development, with a diverse workforce. Taking care of our employees is always on the top of our agenda. By constantly securing safe and healthy working conditions and a positive work environment, we aim to preserve and build on healthy, motivated employees and a strengthened internal culture.

At the same time, we recognise our impact and the responsibility we have towards the people at all levels of our value chain as well as society beyond our sphere of influence. We work with several suppliers and develop our own brands in countries where risks of violations of human rights and labour rights are present. Therefore we work continuously with our partners to help prevent violations of applicable laws in the respective countries.

Going forward, we aim to take a stronger position nationally by working towards digital inclusion in every arena in which we are present.

KompletT's goals for the principle KompletTolerance

- + We will foster an inclusive work environment by developing and caring for our employees
- + We will use our position to emphasize digital inclusion
- + We will gain complete overview of our value chain – tending to people and resources at all levels



Our people

Komplett Group consists of a total of 656 employees distributed between our companies in Norway and Sweden, where 482 are full-time and 163 are part-time contracts.

Komplett also has great seasonal and volume fluctuations and at times uses hired labour, mainly in warehousing, logistics and customer service. The yearly average of hired temporary employees was 261 in 2020. The primary part of these have consisted of short-term contracts and are usually students. We are downscaling the use of temporary staff on an ongoing basis. In 2020, 20 temporary employees were offered permanent positions.

Throughout 2020, Komplett hired 139 new employees. The turnover rate for Komplett Group in 2020 was 17,6%. We are continually working to increase employee satisfaction across departments.

EQUALITY, DIVERSITY AND DIGNITY

Komplett is an equal opportunity employer. We value diversity, and any discrimination and harassment on the grounds of gender, national origin, ethnicity, language, sexual orientation, age and religious and political philosophy is not tolerated in our organisation. This applies to recruitment, career development, working conditions and equal pay for equal work. A personnel handbook is designed to ensure equal opportunities and rights to all employees, as well as to prevent discrimination. Komplett engages more than 15 nationalities. No incidents of discrimination were reported in 2020.

Providing equal opportunities is a concern at all levels of the organisation. The current gender distribution in Komplett is 75 percent men and 25 percent women. This imbalance varies between departments and is largely due to the proportion of male employees in our logistics department and warehouses. In parts of the company where warehouse activity is less extant, the distribution is more balanced. A total of 28 percent are women in the Komplett Group management teams. Our goal is to increase diversity in the organisation, and we will initiate plans in 2021.

KEY TOLERANCE FIGURES FOR KOMPLETT GROUP			
Total employees	Women	Men	Average age
647	25 %	75 %	34 years

KEY DIVERSITY FIGURES FOR MANAGEMENT IN KOMPLETT GROUP						
	Gender		Age			Total
	Women	Men	< 30	30-50	>50	
Komplett Services AS	13	26	3	30	6	39
Webhallen AB	0	8	0	8	0	8
Komplett Group total	13	34	3	38	6	47

KEY TOLERANCE FIGURES FOR KOMPLETT GROUP

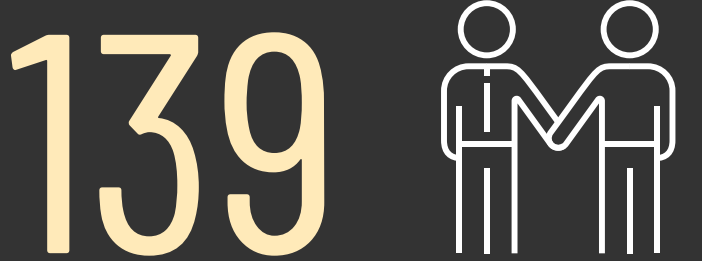
Full-time employees



Part-time employees



New hires



More than



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In Komplet Services AS, women earn 2,8 % more than men in average annual salary.

Komplett supports and participates in the SHE Index initiative to contribute to transparency in gender equality. Komplett Services AS received a medium SHE Index score for 2020, with a reduction in 17 points from the previous year.

A total of 21 employees took out parental leave in 2020, 15 men and 6 women. The average number of weeks for parental leave was 13 and 14, respectively. The majority of the female employees will continue leave into 2021.

PAY EQUITY

To develop and retain existing competence and recruit qualified employees, we offer competitive and stimulating remuneration packages. In addition, Komplett provides good insurance schemes and a comprehensive personnel policy. The combination of competitive remuneration and extensive policies that fosters a positive and engaging environment is what make us an attractive employer.

In Komplett Group, men have 13,4% higher average annual salary than women, excluding compensation of the CEO. This can be viewed in terms of the gender distribution in the company. Men have a larger porportion of the management positions in Komplett Group. The ratio varies betweenourlocations. InKomplettServicesAS, womenearn 2,8 % more than men in average annual salary.

EMPLOYEE WELL-BEING

We pride ourselves in ensuring a happy and healthy work environment and work hard to ensure the well-being of our employees.

Our goal is to attract, retain and develop qualified and motivated employees. Employee satisfaction is high on our agenda, as is company pride. We conduct four employee dialogues every year where during the first dialogue, held in the first quarter, goals for the upcoming period are set.

In the subsequent quarters, goals are assessed, and new goals are set.

To more easily engage with our employees and measure employee satisfaction, Komplett implemented the AI software Winningtemp in 2019. The tool assists to establish the present state of the organisation, measuring indicators related to leadership, employee satisfaction, work situation and personal development. The resulting scores are measured by the responsible department to more easily implement measures in response to the results. Monthly, management and employees in each department evaluate the overall results and present recommendations for further actions. Through the use of Winningtemp, we have seen a change in previous negative trends where these are beginning to turn positive. "Leadership" and "team feeling" are the areas in which the organisation scores highest.

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Komplett has a Work Environment Committee (AMU) to support employee well-being.

Komplett has a Work Environment Committee (AMU) to support employee well-being. The committee consists of eight representatives, where four represent Komplett’s management and the remaining four represent the employees. Planning the health and safety initiatives in the organisation, and follow development in concerns of employee safety, health and wellbeing are the main tasks of the committee. There are also four safety representatives, each responsible for a specific safety area.

An agreement with The Occupational Health Service (Bedriftshelsetjenesten AS) is established at Komplett, in addition to an available representative from The Competence Centre for Drug and Addiction Problems in Working Life (Akan – Arbeidslivets kompetansesenter for rus- og avhengighetsproblematikk). Each year, the AMU, with the help of Bedriftshelsetjenesten, produce an action plan which is valid for one year at a time. Activities that are carried out may, for example, be health controls, sick leave follow-up, facilitation and other counselling services.

TRAINING AND DEVELOPMENT

New employees are provided with all necessary training and guidance to perform their assignments well. Employees hired to our stores in Sweden are provided with additional safety training. Training courses in GDPR, ergonomics, customer management and sales are available to all employees.

Komplett’s Logistics School

In 2019, Komplett developed two specific training courses together with our external partner Fønix: a modular logistics course for the purchasing department and Komplett’s Logistics School.

The purchasing department course offers a thorough and pragmatic introduction to the fundamentals of logistics and its impact on operations, efficiency, the category buyer and the company’s results, as well as the financial implications between logistics and purchasing.

Komplett’s Logistics School is also a modular course adapted to our business. One of the goals of the course is to increase cross-functional logistics competence within the group.

In 2020 nine employees participated in the Logistics School and passed the final exam. A new group of nine employees started the program in the autumn of 2020, with final exams being held in the spring of 2021. The Logistics School is an excellent opportunity for our employees to develop their skills within various areas of the logistics department. Multiple employees have received promotions and other job opportunities internally in the organisation after participating in the program.

Inclusive work-life

Komplett has a longstanding cooperation with The Norwegian Labour and Welfare Administration (NAV), providing work training and skill development opportunities for jobseekers. The aim of this initiative is to provide these persons with relevant experience and a shot at a career.

In our customer service centre, we have another cooperative initiative with NAV. Here, jobseekers are provided with work training and substitute opportunities through Man-

Power for a certain period of time. Through this initiative, Komplett has employed several temporary workers into permanent positions.

Since 2014, Komplett has taken part in the 4S collaboration with Sandefjord High School. Every year, several apprentices are provided trainee positions in various areas of the company. 4S is the name of the partnership the school has initiated with the business community. The program grants general university admissions certification or vocational competence to the students in areas of sales and office-administration. Komplett employed five trainees in 2020, including two summer interns in the development department.



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OCCUPATIONAL HEALTH AND SAFETY

Twelve injuries and no lost time injuries were reported during 2020. Most common injuries are cuts, minor fall injuries, overexertion and stress.

After an incident in 2019 resulting in lost time injury, our routines in the warehouse were reviewed and mitigation measures such as markings on the floor and rearranging shelves were implemented.

Additional measures have been taken to ensure the health of our employees amid the Covid-19 pandemic. An emergency preparedness group was established early on, and we have at the same time maintained close dialogue with health officials. Work from home options have been arranged, information about social distancing in the workplace has been provided, together with restrictions of the number of people present at once. Disinfectants to all employees have also been provided at all of Kompletts locations.

To protect the employees in our physical stores, plexiglass has been installed at registers. Face masks and gloves have been distributed to the staff, and all employees were provided detailed information on their proper use. Floors have been marked and signs put up with recommendations for social distancing.

Average sick leave in Komplet Group in 2020, was 4.68%. Given the abnormalities of this past year, 1.3% of absences are related to Covid-19. Through swift follow-up and communication between managers and employees, facilitating where possible, we work actively to reduce sick leave. Komplet provides employees with health insurance as well as a workplace massage therapist. In 2021 our goal is to reduce sick leave to below 4%.



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The freedom to associate and to bargain collectively are fundamental rights, rooted in the ILO Constitution and one of the backbones of a well-functioning working environment. Many of our employees are organised in a trade union with bargaining power. In Sweden we are affiliated with Unionen(administrative)and Handels(store employees and warehouses). In 2020, 42% of our total employees were covered by collective bargaining agreements. Komplet encourages our employees to join a union and we maintain good dialogue and cooperation with the employee representatives in the company.

Komplet is a member of employer organisations in both Norway and Sweden. These are NHO Service & Handel in Norway and Svensk Handel in Sweden.

4.68%

Average sick leave in Komplet Group in 2020, was 4.68 %. Given the abnormalities of this past year, 1.3 % of absences are related to Covid-19.

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Digital Inclusion

As a leading digital technology provider in Norway, Komplettn will use its position to emphasise digital inclusion. We will work to innovate and provide both well-designed services and introduce initiatives aimed to include all groups of society.

We have worked to build our webpages and our services in a way that enables easy use for our customers. In 2020 we were placed in the top 10 in the Norwegian innovation index (NII) for digital, social and commercial innovations. Using a carefully designed method, NII captures the company’s innovations and customers’ perceptions of the value creation these innovations have brought about.

Komplettn works to continuously develop our websites in line with universal design. Universal design is based on the idea that services should be available to everyone, regardless of age, functional ability and level of education. We strive to facilitate use of our webpages for all our customers. We have previously dedicated a universal design lead among our developers and held workshops to provide insight and awareness. Our ambition is to be a leading within universal design and availability as part of our strategy on digital inclusion.

In 2021 we will evaluate our previous projects, continue developing our concepts and begin pilots for some new initiatives.



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Initiatives

+ Gamers against cancer
Komplett has imitated several projects in 2020. One such initiative is the community fundraiser «Gamers against Cancer» - a Black Week charity initiative to fight childhood cancer.

In our studio in Sandefjord, some of Norway’s top influencers in gaming joined us for a livestream with the aim of collecting donations for The Childhood Cancer Society (Barnekreftforeningen). A representative from The Childhood Cancer Society was present all day, joining the stream to tell the audience about their work and what the donations would help to accomplish. In addition, our suppliers also supported the initiative by donating both money and products as giveaways.

Our yearly Black Friday livestream is our biggest stream with 3000 active viewers on average and was therefore the best occasion to achieve the highest possible donation goal. The stream peaked around midnight Black Friday, with about 6000 viewers. The event raised 2,5 MNOK for the Childhood Cancer Society through the 27-hour livestream event.

+ Spelgrytan is Webhallen’s initiative to contribute to digital inclusion
In December 2019, the initiative “Spelgrytan” was introduced to take a stand to reduce inequality and contribute to digital inclusion in gaming. The purpose of the initiative was to collect donations in terms of games and consoles for organisations working with vulnerable children and youth. Such organisations were kindergartens, sheltered housing, and hospitals where children do not have the opportunity to participate in digital play.

As a result of the initiative, 500 games from 200 different customers, as well as 30,000 SEK in donations from approximately 400 customers were collected and donated. Suppliers also contributed by donating products that allowed us to put together 25 game packages. This initiative was very well received among the employees in Webhallen, who volunteered their time throughout the period of the initiative.



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Supply chain engagement

Komplett’s supply chain consists of many different suppliers, from transporters of goods to delivery of services, to producers and providers of products. We strive to have a continuous dialogue with our suppliers and to improve on all sustainability aspects together through corporation with them.

In 2020, Komplett Group had 338 suppliers which resulted in 27 000 stock keeping units for sale. Our main focus is on consumer electrics. Based on revenue, the most popular product categories in 2020 were components, handheld and PC. Gaming is a category which is important for us and our customers, and we see that our sales have expanded in other categories such as peripherals, brown goods and white goods & home.

Our largest suppliers are Apple, Samsung and Lenovo. In the table below we have listed our top 10 suppliers based on revenue.



PRIVATE LABEL PRODUCTS

Private label is increasing in importance for our business. We are continuously working to adapt our range of private labels to customer preferences. Currently, we offer carefully selected private label products under the brand names Svive, liglo, Intono, 3241, Khameleon and Komplett PC. These products are sourced through our trusted sourcing partners F&H, CBK and Calisto. We have strict procedures and routines for sourcing together with our partners to select products, select new suppliers and to ensure and check quality.

Our product line consists of 1513 products within gaming, office & accessories, HiFi, high performance laptops and high-performance custom build PCs. In 2020 we introduced 483 new products, while 2 products were excluded from our product portfolio because they did not have the quality we demand for our products. All our private label products are sourced from China from a total of 106 factories.

As we are sourcing from other continents, packaging and transport is an important part of our business to reduce our environmental footprint. In the autumn of 2019, we



We have strict procedures and routines for sourcing together with our partners to select products, select new suppliers and to ensure and check quality.



We only cooperate with partners, suppliers and other businesses that maintains a high ethical standard and pursue good business practices.

launched a packaging project for private label products. The goal is to increase revenue and reduce cost, improve functionality and quality, obtain consistency of impression and reduce our environmental footprint, replacing and removing all or most of plastic and metal in our packaging materials.

This project has ended up in consolidating our transport logistics of private label products from China to Norway. Our estimate is that this has resulted in reducing cost of transport by 10%. To exemplify this consolidation, we see that one of our products went from 860 pieces per container to 1075 pieces per container which is equivalent to a consolidation of 25% more products in one container. Increasing the number of products in each container reduces our cost and the climate footprint of each product.

SUPPLIERS CODE OF CONDUCT

We expect decent working and environmental standards throughout the entire supply chain. Our supplier code of conduct covers human rights, workers’ rights, the environment and corruption. We only cooperate with partners,

suppliers and other businesses that maintains a high ethical standard and pursue good business practices. All purchases must follow our suppliers code of conduct and vendor agreement, and we require our suppliers and partners to comply with these standards.

In addition to supplying Komplet with goods and services that are produced in compliance with the code of conduct, partners shall communicate the code of conduct to their sub-suppliers and monitor its implementation. The partner must be able to document compliance with the code of conduct at Komplet’s request. We strive to work with partners who treat their workers with dignity and respect, adhere to applicable laws and regulations, and make their products in an environmentally sustainable manner.

By signing our vendor agreement, suppliers commit to not use forced labour of any kind and to not employ people younger than 15 or below the minimum age for completing compulsory education in the country of manufacture, whichever is higher. If any instances of child labour are found, the supplier must take immediate action.

Number of suppliers per category*

Handheld & accessories	121
White goods & home	114
Components squad	86
Gaming squad	83
Peripherals squad	78
Brown goods	61
PC squad	30

*Suppliers present in multiple categories

Top 10 suppliers based on revenue

1. Apple Distribution International
2. Samsung (3300) Electronics AB
3. Lenovo Technology B.V Norway Branch
4. Tech Data Norway AS
5. ASUS GLOBAL PTE LTD
6. Acer Computer Distribution GmbH
7. ALSO AS
8. Corsair Hong Kong Limited
9. Samsung Electronics AB
10. Also Danmark

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In 2021 we will further develop our risk assessments and engagement with our supply chain related to social and environmental issues.

In 2021 we will review our Code of Conduct and vendor agreements to reflect our increased focus on circularity and implement our new strategy on Enjoyable Product Lifecycles.

RISK ASSESSMENTS AND MANAGEMENT

Komplett has good dialogue with our suppliers, and we view them as one of our most important stakeholders. Knowledge related to risks in our value chain is important to be able to avoid negative impacts and to find new possibilities for our business. Komplett has a yearly risk assessment of the company, and we have started a process to enhance knowledge and risk management related to our own private label in 2020. This work will continue in 2021.

In 2021 we will further develop our risk assessments and engagement with our supply chain related to social and environmental issues. This includes strengthening our internal knowledge and control mechanisms related to these topics, especially within the use of chemicals and hazardous materials and waste. As this area is of great importance to Komplett, in 2021, the management of risks related to our supply chain will be clearly defined within the organisation to establish ownership and responsibility.



Komplett’s Tolerance action plan



Action	Timeline	Status
Measure the temperature in the company using Winningtemp	2021	Ongoing
Implement initiative for knowledge transfer to improve the HR area in Webhallen	2021	Ongoing
Develop concept for promoting digital inclusion in Norway	2021	Ongoing
Update supplier agreements, Code of Conduct and establish internal control and supplier engagement	2021	Ongoing
Increase knowledge and competences in all functions related to supplier engagement	2021	To be implemented

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Komplett circular

Material use

Circular innovation and development

Product quality and safety

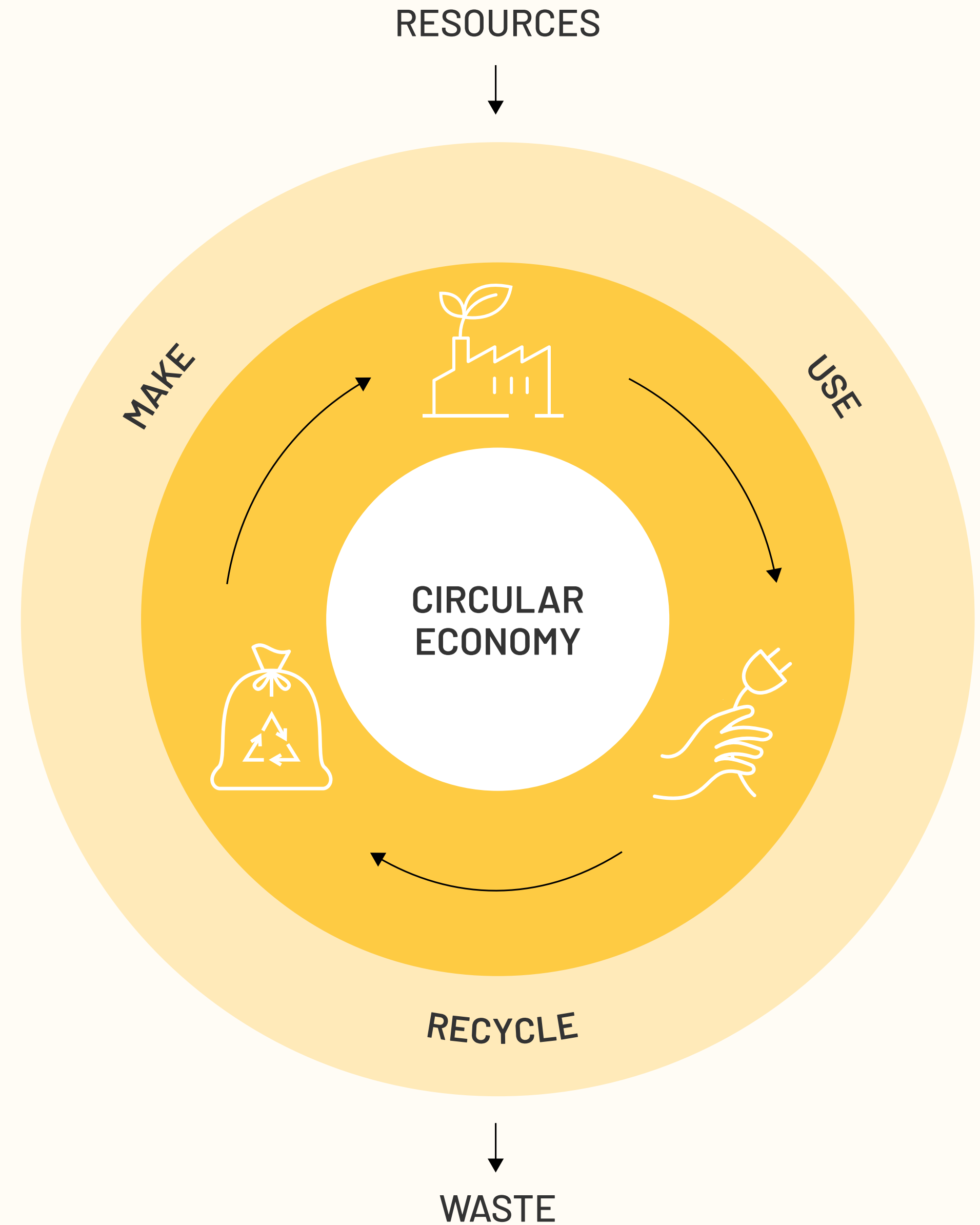
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Komplett circular

Our customers love electronics and constantly buy new products both privately and at work. We know that there are several sustainability challenges associated with electronics such as resource scarcity, environmental footprint of resource extraction and hazardous components that must be recycled safely. At the same time, some materials such as gold can be recycled up to 100 times. These materials are important resources that must be taken care of as part of the electronics life cycle. Unfortunately, a lot of electronics are still not recycled. Therefore, increased recycling of electronics is an important measure to prevent losing valuable resources. We need to salvage these resources so that they can be reincorporated into the life-cycle of electronic products.

Komplett wants to contribute to solving relevant sustainability challenges in the electronics industry. For us, it is important to take responsibility for the lifespan and disposal of our products. We do this by offering circular services, such as "buy-back" and leasing services, and focus on simplifying the return of EE waste. We have clear ambitions to create a return concept that solves challenges in the return flow specifically around online shopping.



Material use

Komplett uses materials for packaging of products. The most common materials are paper, cardboard and plastics. In addition, we use single-use wooden pallets.

It is an important part of our strategy to reduce material use in our packaging, and to only use recyclable materials. In 2020 we used both renewable packaging material (cardboard and wood) and non-renewable material (plastics). We strive to reduce the amount of non-renewable materials. In the cardboard we use, all raw material is sourced from Scandinavian forests and the cardboard is produced in Sweden and Germany. Our supplier of packaging materials is certified with Eco lighthouse environmental management system.

Some of our suppliers use Styrofoam as packaging materials to protect their products before they arrive at Komplett warehouses. Through innovative collaboration with Norsirk, we have been able to reduce the amount of Styrofoam that gets thrown away. Instead of going to waste, we reuse the Styrofoam to package other products. That way, we repurpose the material, and as a result give it a longer lifespan.

WASTE MANAGEMENT

At Komplett, we are engaged with recycling as much of our waste as possible. Through our collaboration with Norsirk, we gain valuable insights into our waste management performance and ideas for measures to further reduce waste. In 2020 our largest waste fractions were paper and cardboard, wood, and general waste. All fractions are recycled, except for general waste which is used for energy recovery. Komplett's total waste amount for 2020 was approximately 1 098 tonnes.

In 2020 we recycled 90,2% of our waste – the same as in 2019. Our goal is to recycle at least 92% of our waste, and we will work to improve the share in 2021.

Electronic waste

Through our partnership with Norsirk, we also gain insights into the end of life treatment of our electronic products sold in Norway. In 2020, Norsirk reported that our sold products represented 2 215 tonnes of the total collected electronic waste. The reported amount of electronic waste is calculated based on Komplett's share of total imported electronic products into Norway.

Materials

Amount in 2020 (kg)

Cardboard	682 566
Single use wood pallets	186 126
Plastics	66 641

Waste fractions

Amount (tonnes)

Paper and cardboard	598
Wood	342
General waste	108
Plastic	33
Metal and glass	18
Food waste	4
Hazardous waste	0,2
Electronic waste	0,01
Styrofoam	0,05

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Circular innovation and development

Product quality and safety

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Circular innovation and development

Komplett is an innovative organisation. Our mission is to make life easier for our customers. In 2021, one of our focus areas for innovation will be to find solutions for enhancing recycling of electronic waste from e-commerce. By partnering with actors such as Norsirk and our suppliers we can develop new ways to efficiently collect electronic waste from our customers.

Consumers in the Scandinavian market are becoming increasingly interested in circular services and products. Komplett is working to develop concepts such as leasing of products and buy-backs. We will seek to develop services together with our partners and launch pilot projects during 2021.

Product quality and safety

Every day we work hard to meet customer needs, both present and future. This includes product quality, product mix as well as service and support.

All our products undergo health and safety evaluations and are in compliance with relevant laws and regulations before being launched in our stores. Continuous improvement of processes and constant competence development is high on our agenda in order to fulfil customer, regulatory, and internal quality requirements. We will continue this work in 2021.

Komplett had no non-compliance incidents concerning the health and safety impacts of products in 2020. During the year we reclaimed two products from our private label due to incidents reported by customers where the products had malfunctioned. The incidents were handled according to our procedures for product quality and safety, and the products have been removed from our portfolio.



Komplett's circular action plan			
Action	Timeline	Status	
Expand the lifetime of our products	2020-2025	Ongoing	
Launch services for leasing and buy-back	2021	Ongoing	
Create awareness around return of electronic waste and improve information on our webpages	2021	To be implemented	
Electronic waste initiative: find a sustainable solution for managing electronic waste with our partners	2021	To be implemented	

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Komplett environment

One of Komplett’s main ambitions is to reduce our GHG emissions. This is in line with our stakeholders’ interests and is necessary for Komplett to be a company fit for the future. We experience an increasing demand for low emission services in tenders and from our customers. In 2020 we continued the mapping of our organisations GHG-emissions and engaged with our suppliers to reduce emissions from the transport of goods.

The transformation into a low-carbon society provides Komplett with both challenges and possibilities for business development and services in line with our customers’ needs and the demands from regulators and other stakeholders. We will continue to evaluate risks to our business from changes in climate and environment in the coming years.

GHG-emissions

A first step to reducing emissions, is to get an overview of sources and hotspots. We have therefore calculated our carbon footprint for direct and indirect emissions from our activities for the first time for 2020. The results confirm that transport of goods is our largest impact and challenge.

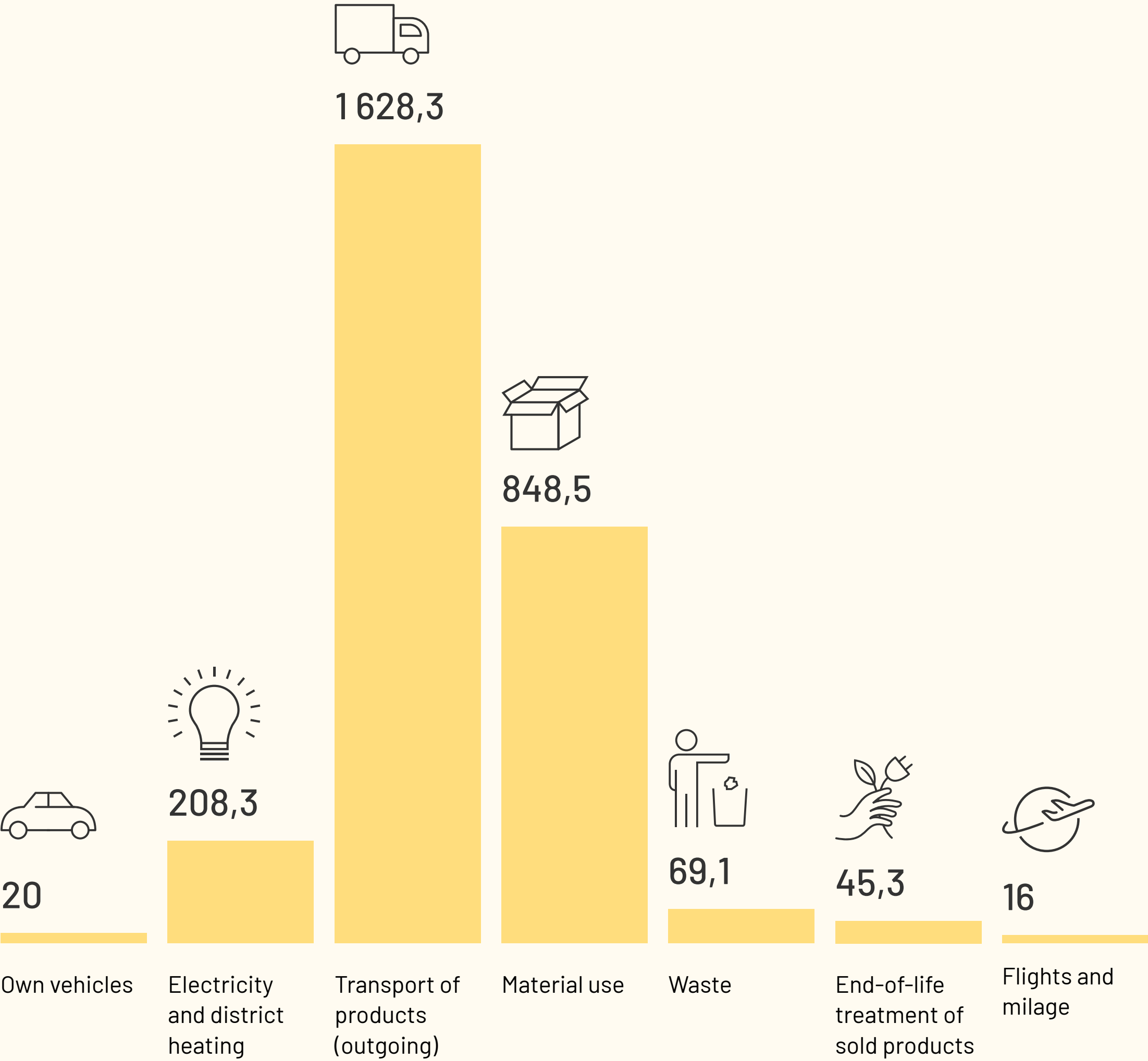
We have learned a lot about our organisation from mapping our climate footprint in 2020 and will continue to improve our routines and reporting over the next years. For 2020 we have not been able to map our entire climate footprint, especially regarding emissions from our value chain (scope 3). We will continue to improve on our reporting and expand the scope going forward. In 2021 we will further develop our environmental management system, and engage with our employees, suppliers and customers on ways to reduce our climate impact in the entire value chain. One of our main goals is to develop and offer zero emission delivery services to our customers by 2026.



One of our main goals is to develop and offer zero emission delivery services to our customers by 2026.

Greenhouse Gas Emissions 2020

Tonne CO2e



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Environmental impact

ENERGY CONSUMPTION

Komplett’s energy consumption comes from our owned vehicles and from electricity use in our offices, warehouses and stores.

In 2020 the total energy consumption was 7 857 MWh, originating from use of owned vehicles, electricity and heating. Energy from use of diesel in Komplett’s owned vehicles makes up 74,4 MWh, 0,9% of this energy consumption. The remaining 7 782,6 MWh, 99,1%, comes from electricity and heating in our warehouses, offices and stores.

11% of Komplett’s energy consumption in Norway is from renewable solar energy. Solar panels are installed at our warehouse in Sandefjord. In 2020, we consumed 356,5 MWh of electricity produced from this installation.

TRANSPORT

As a significant actor within e-commerce, transport logistics is an extensive part of our business. This means that we send out large quantities of goods every day. The benefit of Komplett’s business model is that it cuts out the middleman, by transporting goods directly from storage to the customer.

Nevertheless, we recognise that our impact from transport of goods is one of our main challenges. We therefore work continuously to reduce our greenhouse gas emissions, especially in transport. In 2021 we want to develop our solutions for efficient transport. Our goal is to provide zero

Energy from electricity and heating

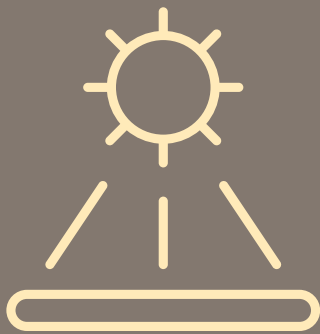
Norway	3 420 MWh
Sweden	2 177,5 MWh
Stores	2 260 MWh

emission delivery options for our customers by 2026. That way we enable our customers to make sustainable choices. In addition, we will engage with our transporters and develop standards for environmentally conscious transport solutions in our value chain.

Packaging of our products in smarter ways can improve our impact from transport, as less packaging per product means less volume to transport. Komplett is considering ways to optimise packaging so that each package is as small as possible. By adapting box sizes, we can save space, plastics and emissions from transporting of our products.

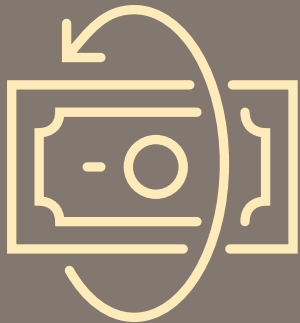
Returns

We strive towards continually optimising our product mix and go-to-market approach. At the same time, we are positioning ourselves for a more sustainable growth.



11 %

of Komplett’s energy consumption in Norway is from renewable solar energy



14 %

Return rate is reduced by 14 % from 2019 to 2020

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The high return rate known for e-commerce business in general has an increasing public focus and is negative for its climate impact. Sending goods back and forth, Komplett strives to reduce return rate to a minimum, which is good for both Komplett and the climate. The return rate on products was 2,5 % in 2019 and 2,15 % in 2020. As our total sales increased in 2020, we are very pleased to see that the return rate has been reduced. We always strive to provide our customers with the product that they need and deliver products with high quality to avoid returns.

LABELLING

Consumers are increasingly concerned with sustainability. Komplett works to continually improve our labelling to ensure information about environmental standards and energy efficiency of products are clearly communicated to our customers. We want to enable our customers to make informed and environmentally conscious choices.

There was one incident of non-compliance concerning product and service information and labelling in 2020. This occurred during an inspection from the Norwegian Environment Agency and was related to labelling of contents in our warehouse in Sandefjord. It is part of our producer responsibility to correctly label all products, and the issue was corrected. We have implemented additional routines to avoid similar incidents in the future.

In 2021, Komplett will review our product information and make sure we have complete overview of the environmental labelling of all products sold through Komplett. This is a prioritised area for us as lack of correct marking and labelling can result in reduced level of trust from our customers and clients, as well as fines from regulators. This entails engagement with our suppliers of products and services and enhanced knowledge among our employees.



Komplett’s Environment action plan



Action	Timeline	Status
Revise our environmnetal program towards 2026 <i>Determine clear goals for reduction of GHG-emissions</i>	2021	To be implemented
Reduce GHG-emissions and offer zero emission delivery alternatives	2026	To be implemented
Optimise logistics to reduce impact on environment	2022	To be implemented
Mapping of environmental labelling and certifications in our product portfolio, and set a standard for sufficient labelling	2021	To be implemented
Include information on the sustainability of products to our clients in stores/online	2022	To be implemented

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EMPLOYMENT	Norway	Sweden	Total
Employees in Komplett Group			
Total employees	336	320	656
Number of permanent employees	336	320	656
Number of temporary employees	0	0	0
Of which are full-time	321	159	480
Of which are part-time	15	161	176
New hires	71	68	139
Turnover	12,9 %	22,8 %	17,6 %
Hired labor			
Hired temporary employees	148	113	261
DIVERSITY AND EQUALITY			
Percentage of women	28 %	21 %	25 %
Percentage of women in full-time postitions	28 %	21 %	26 %
Percentage of women in part-time positions	26 %	22 %	23 %
Average age	38	29	34
Average weeks parental leave women	13,4	26,5	17,0
Average weeks parental leave men	11,2	18,0	13,0
Ratio of salary women to men	2,8 %	-20,0 %	-13,4 %
MANAGEMENT	Norway	Sweden	Total
Total management positions	39	8	47
Percentage of women	33 %	0 %	28 %
Age <30	3	0	3
Age 30-50	30	8	38
Age >50	6	0	6

HEALTH AND SAFETY			
Estimated Man Hours	633 302	387 682	1 020 984
Sick Leave	4,36 %	5,28 %	4,68 %
Work Related Injuries	7	5	12
Lost Time Injuries	0	0	0
Fatalities	0	0	0
GHG-EMISSIONS			
Scope 1			
Diesel owned and rented vehicles (tCO2e)	8,1	11,9	20,0
Scope 2			
Electricity (tCO2e)	124,3	83,9	208,3
Electricity from solar panals (tCO2e)	0	-	0
Heating (tCO2e)	-	0	0
Scope 3			
Supplier transportation (outgoing) (tCO2e)	1 224,7	403,5	1 628,26
Flights (tCO2e)	15,12	-	15,1
Business travel milage (tCO2e)	-	0,83	0,83
Waste (tCO2e)	65,67	3,42	69,09
End of life treatment of sold products (tCO2e)	45,3	-	45,3
Total emissions			
Total emissions (tCO2e)	1 996,8	838,6	2 835,4

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ENERGY CONSUMPTION

Owned and rented vehicles (MWh)	30	44,4	74,4
Electricity (MWh)	3033,1	2047,8	5 081,9
Electricity from solar panels (MWh)	356,5	-	356,5
Heating (MWh)	-	2345,2	2 345,2

WASTE

Total waste (Tonnes)	942,4	160,5	1 102,9
Recycling rate (Tonnes)	89,9 %	91,6 %	90,2 %

END-OF-LIFE TREATMENT OF SOLD PRODUCTS

EE-waste (Tonnes)	2124,9	-	2 124,9
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PACKING MATERIALS

Plastics (Tonnes)	28,3	38,4	66,6
Cardboard (Tonnes)	475,3	207,3	682,6
Single use wood pallets (Tonnes)	63	123,1	186,1

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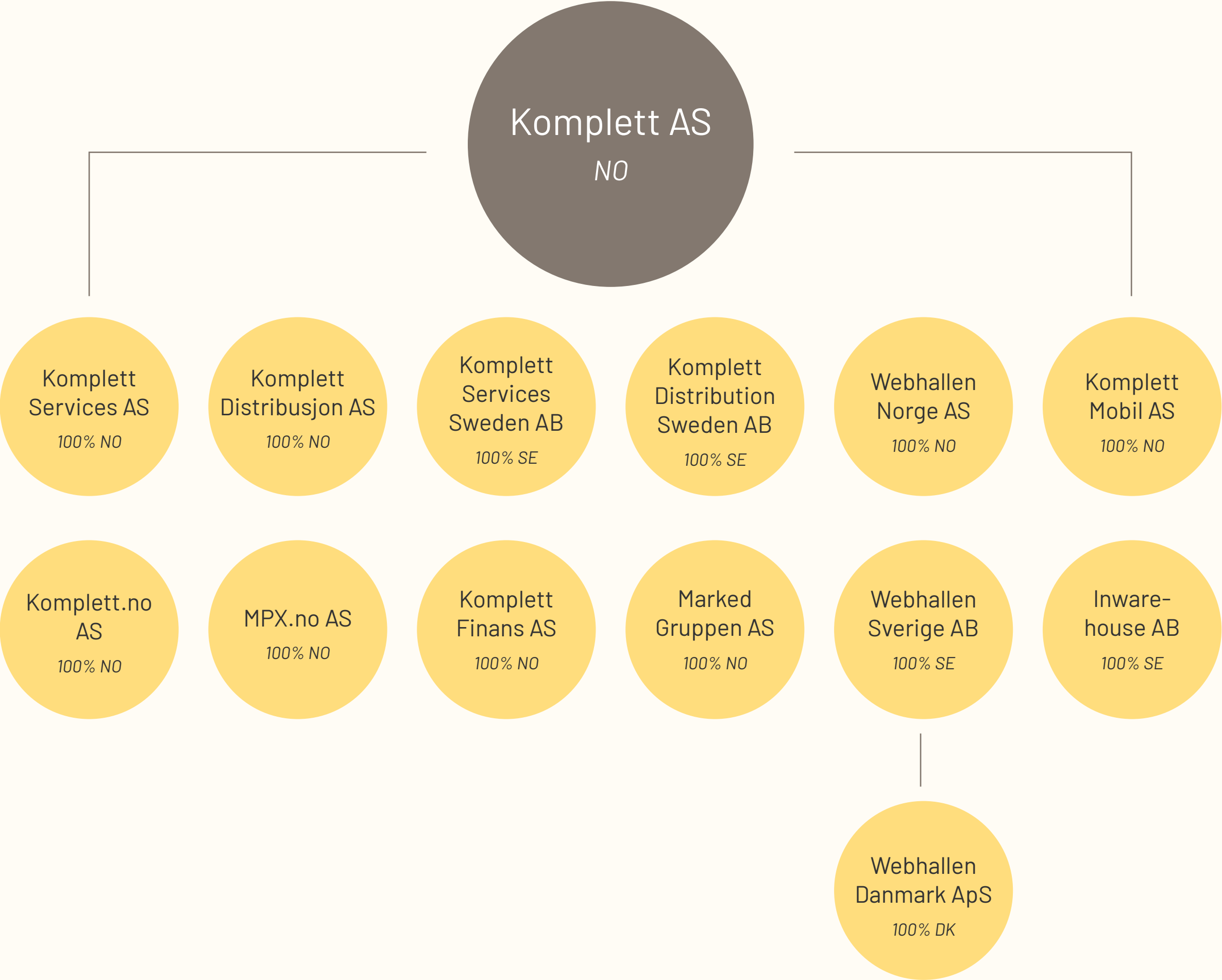
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GRI STANDARD	DISCLOSURE NUMBER	DISCLOSURE TITLE	COMPLETENESS	REFERENCE/RESPONSE	COMMENT
GENERAL DISCLOSURES					
102-1		Name of the organization	Complete	Komplett AS	
102-2		Activities, brands, products, and services	Complete	About Komplett	
102-3		Location of headquarters	Complete	Oslo	
102-4		Location of operations	Complete	About Komplett	
102-5		Ownership and legal form	Complete	About Komplett	
102-6		Markets served	Complete	About Komplett	
102-7		Scale of the organization	Complete	About Komplett	
102-8		Information on employees and other workers	Complete	Komplett tolerance: Equality, diversity and dignity	
102-9		Supply chain	Complete	Responsible Supply Chains	
102-10		Significant changes to the organization and its supply chain	Complete	Responsible Supply Chains	
102-11		Precautionary Principle or approach	Complete	Sustainability Governance	
102-12		External initiatives	Complete	About Komplett	
102-13		Membership of associations	Complete	About Komplett	
102-14		Statement from senior decision-maker	Complete	Message from the CEO	
102-15		Key impacts, risks, and opportunities	Complete	Sustainability Governance: Group policies	
102-16		Values, principles, standards, and norms of behavior	Complete	About Komplett, Sustainability Governance, Komplett Tolerance	
102-18		Governance structure	Complete	Sustainability Governance	
102-26		Role of highest governance body in setting purpose, values, and strategy	Complete	Sustainability Governance	
102-40		List of stakeholder groups	Complete	Our new strategy	
102-41		Collective bargaining agreements	Complete	Komplett Tolerance: Freedom of association and collective bargaining	

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GRI STANDARD DISCLOSURE NUMBER	DISCLOSURE TITLE	COMPLETENESS	REFERENCE/RESPONSE	COMMENT
GENERAL DISCLOSURES				
102-42	Identifying and selecting stakeholders	Complete	Our new strategy	
102-43	Approach to stakeholder engagement	Complete	Our new strategy	
102-44	Key topics and concerns raised	Complete	Our new strategy	
102-45	Entities included in the consolidated financial statements	Complete	Annual report 2020, About Komplett	
102-46	Defining report content and topic Boundaries	Complete	About the report	
102-47	List of material topics	Complete	Our new strategy	
102-48	Restatements of information	Complete	Not relevant	
102-49	Changes in reporting	Complete	About the report	
102-50	Reporting period	Complete	2020	
102-51	Date of most recent report	Complete	March 2020	
102-52	Reporting cycle	Complete	Annual	
102-53	Contact point for questions regarding the report	Complete	kristin.hovland@komplett.com	
102-54	Claims of reporting in accordance with the GRI Standards	Complete	About the report	
102-55	GRI content index	Complete	GRI Index	
102-56	External assurance	Complete	No external assurance of the Sustainability report	
MANAGEMENT				
103-1	Explanation of the material topic and its Boundary	Complete	Below each chapter	
103-2	The management approach and its components	Complete	Below each chapter	
103-3	Evaluation of the management approach	Complete	Below each chapter	
ECONOMIC PREFORMANCE				
201-1	Direct economic value generated and distributed	Complete	Annual report 2020, About Komplett	
201-2	Financial implications and other risks and opportunities due to climate change	Complete	Komplett environment	

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ANTI-CORRUPTION				
205-1	Operations assessed for risks related to corruption	Work in progress		Work in progress in 2020, and part of our strategy in 2021. Will be part of our reporting for 2021
205-2	Communication and training about anti-corruption policies and procedures	Work in progress		Work in progress in 2020, and part of our strategy in 2021. Will be part of our reporting for 2021
205-3	Confirmed incidents of corruption and actions taken	Complete	Sustainability Governance: Ethical business conduct	
ANTI-COMPETITIVE BEHAVIOUR				
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Complete	Sustainability Governance: Ethical business conduct	
MATERIALS				
301-1	Materials used by weight or volume	Complete	Komplett Circular: Material use	
ENERGY				
302-1	Energy consumption within the organization	Complete	Komplett Environment: Environmental impact	
EMISSIONS				
305-1	Direct (Scope 1) GHG emissions	Complete	Komplett Environment: GHG-emissions	
305-2	Energy indirect (Scope 2) GHG emissions		Komplett Environment: GHG-emissions	
305-3	Other indirect (Scope 3) GHG emissions		Komplett Environment: GHG-emissions	
EFFLUENTS AND WASTE				
306-2	Waste by type and disposal method	Complete	Komplett Circular: Material use	
ENVIRONMENTAL COMPLIANCE				
307-1	Non-compliance with environmental laws and regulations	Complete	No cases in 2020	

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GRI STANDARD DISCLOSURE NUMBER	DISCLOSURE TITLE	COMPLETENESS	REFERENCE/RESPONSE	COMMENT
SUPPLIER ENVIRONMENTAL ASSESSMENT				
308-1	New suppliers that were screened using environmental criteria	Work in progress		Not available for 2020. Is part of strategy for 2021
EMPLOYMENT				
401-1	New employee hires and employee turnover	Work in progress	Komplett tolerance: Equality, diversity and dignity	Not divided by gender, age and region
401-3	Parental leave	Work in progress	Komplett tolerance: Equality, diversity and dignity	Not included return to work statistics
Komplett indicator	Parental leave	Complete	Komplett tolerance: Equality, diversity and dignity	New legal requirement in Norway
OCCUPATIONAL HEALTH AND SAFETY				
403-1	Occupational health and safety management system	Complete	Komplett tolerance: Occupational health and safety	
403-2	Hazard identification, risk assessment, and incident investigation	Complete	Komplett tolerance: Occupational health and safety	
403-5	Worker training on occupational health and safety	Complete	Komplett tolerance: Employee well-being and development. Occupational health and safety	
403-8	Workers covered by an occupational health and safety management system	Complete	Komplett tolerance: Occupational health and safety	
403-9	Work-related injuries	Complete	Komplett tolerance: Occupational health and safety	
TRAINING AND EDUCATION				
404-1	Average hours of training per year per employee	Work in progress		Not available in 2020
404-2	Programs for upgrading employee skills and transition assistance programs	Complete	Komplett tolerance: Employee well-being and development	
DIVERSITY AND EQUAL OPPORTUNITY				
405-1	Diversity of governance bodies and employees	Complete	Komplett tolerance: Equality, diversity and dignity	
405-2	Ratio of basic salary and remuneration of women to men	Complete	Komplett tolerance: Equality, diversity and dignity	
NON-DISCRIMINATION				
406-1	Incidents of discrimination and corrective actions taken	Complete	Komplett tolerance: Equality, diversity and dignity	

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CHILD LABOUR				
408-1	Operations and suppliers at significant risk for incidents of child labor	Work in progress		Work in progress in 2020, and part of our strategy in 2021. Will be part of our reporting for 2021
FORCED OR COMPULSORY LABOR				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Work in progress		Work in progress in 2020, and part of our strategy in 2021. Will be part of our reporting for 2021
SUPPLIER SOCIAL ASSESSMENT				
414-1	New suppliers that were screened using social criteria	Work in progress		Not available for 2020. Is part of strategy for 2021
CUSTOMER HEALTH AND SAFETY				
416-1	Assessment of the health and safety impacts of product and service categories	Complete	Komplett Circular: Product quality	Not available for 2020. Is part of strategy for 2021
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Complete	Komplett Circular: Product quality	
MARKETING AND LABELING				
417-2	Incidents of non-compliance concerning product and service information and labeling	Complete	Komplett Environment: Environmental impact	
417-3	Incidents of non-compliance concerning marketing communications	Complete	No incidents in 2020	
CUSTOMER PRIVACY				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Complete	Sustainability Governance: Group policies	

