



# SUSTAINABILITY REPORT

Sustainability is high on Qliro's agenda and we are increasing our commitment and social responsibility as we expand. Alongside our employees, connected merchants, customers and owners, we work strategically to drive progress towards a more sustainable future. We achieve this by making active decisions about how to care for society and our planet.

Qliro has established procedures for its sustainability work and corporate governance in order to ensure responsible, efficient and transparent operations. We are convinced that our work, focusing on social engagement, business ethics and environmental commitment, creates positive value for Qliro's stakeholders.

We identify the impact we have on the global and social environment, and our sustainability work focuses on three key areas;

- Sustainable e-commerce
- Responsible lending and business practices
- Being an attractive employer

The Sustainability Report for 2023 comprises Qliro AB (publ) and its subsidiaries. This is Qliro's fourth Sustainability Report prepared in accordance with chapters six and seven of the Annual Accounts Act. The Auditor's opinion regarding the statutory Sustainability Report can be found on page 38.

### Business model

Qliro is a credit market company under the supervision of the Swedish Financial Supervisory Authority. Sweden is the main market, but Qliro also operates in Norway, Finland and Denmark. Qliro was founded in 2014 and the operations are divided into two business areas: Payment Solutions and Digital Banking Services.

Qliro's payment services ensure that e-merchants receive secure payment for their goods and allow consumers to shop securely online, and pay for their purchases with different direct payment options such as bank card and Swish, or by invoice and installments.

Qliro also provides personal loans to Swedish consumers and savings accounts for Swedish and German consumers.

### Sustainability management

Ultimate responsibility for sustainability matters rests with Qliro's Board of Directors, which decides on the strategic direction and establishes Qliro's policy framework and control processes. The CEO is responsible for integrating the sustainability work into operations. Each function is responsible for driving and developing the work within its area.

### Selection of Qliro's operational policies that impact sustainability:

- Enterprise Risk Management Policy – sets out the fundamental principles that apply to Qliro's processes and structures with regard to risk management.
- Code of Conduct – contains principles for ethical and responsible behavior at Qliro to contribute to a sound and sustainable financial market, society and environment.

- Conflict of Interest Policy – describes how employees and representatives of Qliro should respond to potential conflicts of interest and similar situations, e.g. gifts and benefits.
- Anti-Money Laundering and Counter-Terrorism Financing Policy – describes the reasoning behind Qliro's measures to prevent money laundering and terrorism financing.
- Credit Policy – describes processes for lending and managing credit risk to ensure sound lending.
- Whistleblower Policy – ensures that Qliro's employees know how to report sensitive issues such as discrimination without risking negative treatment.
- Policy for handling customer issues and complaints – describes how Qliro handles customer complaints.
- Remuneration guidelines for senior executives – adopted by the Annual General Meeting.
- Merchant Policy – fundamental principles and methods applied by Qliro to ensure that new and existing merchants satisfy Qliro's requirements regarding counterparty risk, volume, profitability and ethics.
- Governance Policy – ensures effective internal control and management in accordance with regulatory requirements as well as the internal framework, in order to have effective independent control functions and for the Board's ability to effectively monitor Qliro's operations.

Qliro's most significant risks in this area involve:

- Responsible lending
- Sound business ethics
- Financial crime
- Attractive employer
- Gender equality and diversity

As a regulated credit market company and given the nature of Qliro's business, risk and risk management are natural elements in Qliro's daily operations. To manage risk, Qliro seeks continuously to maintain a positive risk culture, a high level of risk awareness, and a cautious approach to taking risk. The Board of Directors decides on Qliro's risk appetite and has a well-established structure for internal governance and risk management control. All internal control documents adopted by the Board are reviewed and updated annually, or more frequently when necessary. The Board and, according to instructions from the Board, the CEO are responsible for regularly evaluating whether Qliro's overarching risks are monitored and managed effectively and appropriately. The Board has established a committee to support its work – the Risk, Capital, Audit and Compliance Committee ("RCACC") – whose tasks include ensuring that risk taking is well-balanced and controlled, monitoring financial reporting and

ensuring that internal control is effective. For more information on the RCACC, see page 41. The company has implemented internal structures, procedures and processes for internal governance in accordance with the Swedish FSA's Regulations and General Guidelines (FFFS 2014:1) regarding governance, risk management and control in credit institutions.

### Risk management based on three lines of defense

Qliro's risk management is based on the three lines of defense model. Risks that could materially impact Qliro's strategic, operational, reporting and compliance goals must be managed correctly and adequately. Qliro systematically assesses the risks that the company faces to identify, analyze and evaluate current and potential risks and how they are managed and reported.

This assessment is carried out through the risk management process, which comprises six steps: risk identification, risk analysis, risk assessment, risk management, risk monitoring and reporting.

Qliro's risks and risk management are described in more detail in each focus area and on pages 53–55 in the Directors' Report.

### Qliro works with 9 UN Sustainable Development Goals

In addition to following the existing regulatory frameworks that apply on our different markets, Qliro works with 9 of the 17 UN Sustainable Development Goals. The 9 goals we have identified that Qliro is able to impact and contribute to are:



Qliro contributes financially to an aid organization focused on fighting child poverty. The organization supports children in deprived areas by promoting safety, freedom, influence, improved health and access to education.



Qliro takes responsibility for individuals and society by providing a safe and healthy working environment. Extensive routines and processes, and relevant HSEQ training, ensures Qliro's commitment to sustainable development and social responsibility.



Qliro promotes gender equality with equal opportunities for women and men. This implies a fair distribution of power, influence and resources. We are committed to developing a sustainable culture and workplace distinguished by gender equality, equal terms and diversity.



Qliro contributes to more sustainable growth and stable job opportunities by being a safe employer. This includes safeguarding employment, salaries and training opportunities. We also strive to support our collaboration partners' operations, while our payment solutions promote sustainable economic growth on our markets.



We work to be inclusive, sustainable and to meet the challenges facing humans and the planet. We consider innovation and technological advances key to finding sustainable solutions to financial and environmental challenges. In our development of new products and services, we involve Qliro's Compliance and Legal functions at an early stage in order to ensure regulatory compliance and the necessary processes and controls.



Qliro works to reduce inequalities and to ensure that no one is left out. We are committed to creating an equal society where everyone has equal rights and opportunities regardless of financial or social status, based on the principle of the equal value of all humans regardless of sex, ethnicity, religion, disability, age or other status.



Qliro offers responsible and sustainable lending through credit checks and processes that ensure good repayment capacity and prevent excessive debt. We also implement environmentally friendly recycling and reuse products and waste.



Despite Qliro being a minor operator in global terms with limited direct climate impact, we actively seek to educate and increase awareness of climate issues. We believe that our role as an intermediary between e-merchants and consumers in the Nordics provides us with the opportunity to drive change towards a more sustainable future.



Qliro strictly follows regulatory guidelines and requirements aimed at fighting organized crime, money laundering and financing of terrorist activity.

## FOCUS AREA 1

# Sustainable e-commerce and reduced climate impact



Contributing to reduced climate impact is a high priority for Qliro. We work actively to reduce our greenhouse gas emissions. Even if we are a minor operator that is unable to control the entire value chain, we seek to drive change towards a more sustainable future by making conscious choices in our day-to-day operations.

### Climate impact and initiatives in day-to-day operations

As a digital company active in payment solutions and financial services, Qliro's main environmental impact is derived from its offices, data centers and business travel, which are prioritized areas in our day-to-day operations.

Over the past year, we prioritized addressing our climate impact, and completed a major project aimed at reducing paper use, both internally and by our customers. This resulted in an impressive reduction in paper consumption of 39 percent. This is a result that we are continuing to build on and improve, with the goal of reducing our climate footprint further.

We have also actively chosen to reduce our use of data centers and almost halved our office space between 2022 and 2023. This has had a positive impact as we successfully reduced our consumption of heating, cooling and electricity in 2023. In the office, we actively strive to reduce our environmental impact by reducing our use of white goods, replacing furniture with second hand items, and reusing or selling machines and electronic equipment. This allows us to extend the lifespan of products and save planetary resources.

During the year, we also provided staff training and challenged ourselves in our management of garbage and waste. Our offices now provide facilities for sorting food waste, plastic, paper, glass, metal, and hazardous waste such as lamps and batteries. We continue to prioritize vegetarian options and to use organic, Svanen-marked and Fairtrade-certified products.

In 2023, Qliro revised its travel policy to meet growing demand for business travel in line with our expansion. Given the increase in travel compared to 2022, we are highlighting the importance of responsible travel to our employees clearly. This includes prioritizing train travel over air travel, and choosing public transport over journeys by taxi or car.

### Energy consumption

All electricity used in Qliro's operations is derived from 100 percent renewable sources. Our data centers are operated by hydropower and the building where Qliro's offices are located is BREEAM-certified at level 4 of 6, implying very high environmental performance. BREE-

AM-certification originated in the UK and is the most widely used system for environmental certification in Europe, measuring a property's environmental performance in a number of areas.

kWh	2023	2022 <sup>1</sup>
Property energy – share of property	80,344	130,000
Heat consumption – share of property	34,717	41,800
Cooling consumption – share of property	5,243	15,438
Electricity consumption – data centers	128,394	198,442
Electricity consumption – share of property	40,385	72,675
<b>Total energy consumption</b>	<b>289,083</b>	<b>458,355</b>

1) New table compared to 2022, resulting in variations in kWh consumption compared to previously reported figures for 2022.

### Waste and recycling

Our goal is to make recycling and waste management easy and to ensure it is done correctly. Qliro's offices provide clearly marked stations for various types of recycling: Hazardous waste currently consists of fluorescent lamps, batteries and electronics, while non-hazardous waste consists of cardboard, paper and plastics. Since the beginning of the year, we have also prioritized food waste to contribute to production of biofuel. In order to ensure the correct handling of hazardous waste and recycling of materials, Qliro has chosen two suppliers that offer transparency and insight into the management of the materials processed.

In 2023, Qliro saved over 2.7 metric tonnes CO<sub>2</sub> by recycling various types of material. This figure was lower than in 2022, mainly due to increased internal reuse of electronic waste and other materials. This reflects our active efforts to reduce the use of paper in order to save planetary resources, and promote a more sustainable and digital future.

Kg	2023	2022
Total weight, hazardous waste	212	596
Total weight, non-hazardous waste reused/recycled	5,278	6,458



## Travel

During the year, Qliro updated its travel policy guidelines, which form part of the personnel handbook. This was due to the increased need for physical meetings with existing and potential customers and partners. The changes introduced increased the emphasis on traveling more responsibly. This includes prioritizing train travel over air travel, public transport over journeys by taxi or car, and the continued recommendation to prioritize online meetings and video conferencing.

## Ambitions and results in 2023

In 2023, Qliro continued to actively reduce its climate footprint and impact. To summarize, our efforts have yielded significant effects, including a reduction in our use of data centers and reduced office space. This resulted in reduced consumption of electricity, heating and cooling. In addition, our project aimed at reducing paper use, both internally and externally by our customers, led to a reduction of 39 percent in paper consumption. This is an area that we will continue to prioritize over the coming years.

In addition, we also actively participated in initiatives aimed at offering support to disaster zones, such as refugee camps in Gaza and other vulnerable regions. This is a obvious choice for us as we strongly value the importance of a safe environment for the children of the world.

## Ambitions 2024

Qliro's ambition is to accelerate its contribution to realizing a more sustainable society for humans, the planet and general welfare each year. Qliro works actively to exert an influence across all dimensions: financial, social and environmental.

As a result of our environmental initiatives aimed at reducing paper use, which started in 2022 and continued throughout 2023, we will urge our customers and suppliers to reduce paper consumption during 2024. Qliro takes increased responsibility for this by promoting digital services as part of our overall goal of digitizing a large proportion of our communication.

We retain a high level of ambition regarding our climate footprint, and strive to educate and develop our employees' competencies on matters relating to Qliro's climate impact. Qliro also has the ambition of further reducing its use of data centers, shifting towards becoming even more cloud based. We also continue to complete various other initiatives aimed at creating a safer world.

During 2024, Qliro will lead initiatives and participate in new networks in the e-commerce sector, where we are driving progress towards a more sustainable future alongside other e-merchants.

## FOCUS AREA 2

# Responsible business and lending



Qliro's main business consists of offering e-merchants in the Nordics a flexible and secure payment solution. The solution also includes modern payment methods offered through partners as well as Qliro's proprietary Pay Later products, such as invoices and paying by installments. Qliro's solution ensures that e-merchants receive payment for their goods and that consumers can shop securely online, and offers flexibility regarding choice of payment method.

Given the nature of Qliro's business, the most important sustainability issues are:

- Responsible lending
- Sound business ethics, anti-corruption and financial crime (including money laundering, terrorist financing and fraud)

### Responsible lending

Lending is a key part of Qliro's business and accounts for the majority of income. Lending plays an important role in a functional society and gives consumers the opportunity to increase their purchasing power and spread their expenses over time. As a consumer, borrowing money has a direct impact on your personal finances, and responsible lending means carefully considering these perspectives and ensuring that sufficient information is available to enable well-informed decisions.

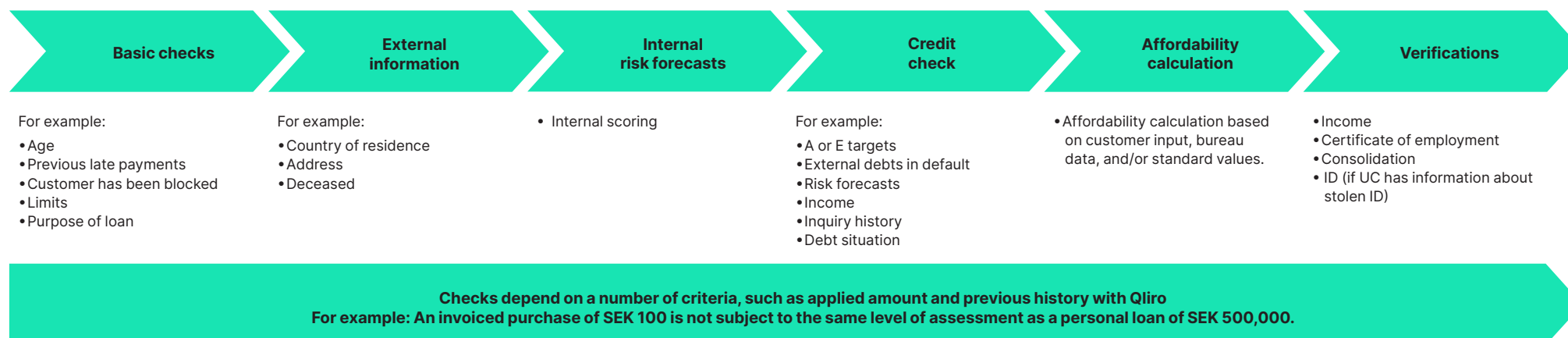
Consumer lending is licensed and supervised by the Swedish FSA. In addition to following existing regulatory frameworks and guidelines, Qliro follows the Swedish Bankers' Association Responsible Lending Code. We only offer credit to individuals who we believe can repay their debt. However, there is always a risk that customers, for various reasons, will encounter problems repaying their loans, which is not desirable for the customer, society or us as a lender. This means that responsible lending is the most obvious focus of our sustainability work.

Qliro's responsibility as a lender includes managing and minimizing all material risks associated with lending. The most material risks relating to responsible lending can be divided into three areas, where Qliro works actively;

- Insufficient repayment capacity
- Excessive debt among customers
- Increased indebtedness in society

Internal control, together with robust internal systems and processes, is fundamental.

### Credit assessment steps (selection of checks)



## Robust credit checks identify insufficient repayment capacity

A credit check is completed for all purchases made using Qliro's Pay Later products, regardless of size and duration. The purpose of the credit check is to assess and analyze the risk that the customer is unable to fulfill their obligations. This allows creditworthy customers to use all of Qliro's payment options, while customers with an increased risk of insolvency are referred to direct payment alternatives.

Qliro's credit assessment is a data-driven, integrated process supported and complemented by internal expertise. Qliro uses score cards and applies regulations to make the credit risk assessment as precise as possible, and the score cards are continuously developed to improve credit score precision.

In e-commerce transactions consumers need immediate answers to their credit inquiries. This places high demands on Qliro's infrastructure, processes and data quality. Ahead of a credit assessment, data is obtained from external credit agencies and then combined with internal transaction- and customer-specific data points. The fact that the credit assessment is point-in-time, in connection with each individual application, helps Qliro to obtain an optimized ad up-to-date understanding of the customer's financial position, which contributes to increased precision.

Private loans are only offered in Sweden subject to a maximum amount for any individual borrower of SEK 200,000. The credit assessment process for private loans involves a similar procedure using score cards and regulations as for the Pay Later products, and a new credit assessment takes place in connection with every application. Considering the, on average, higher loan amounts, further manual checks are also carried out before approval and payment.

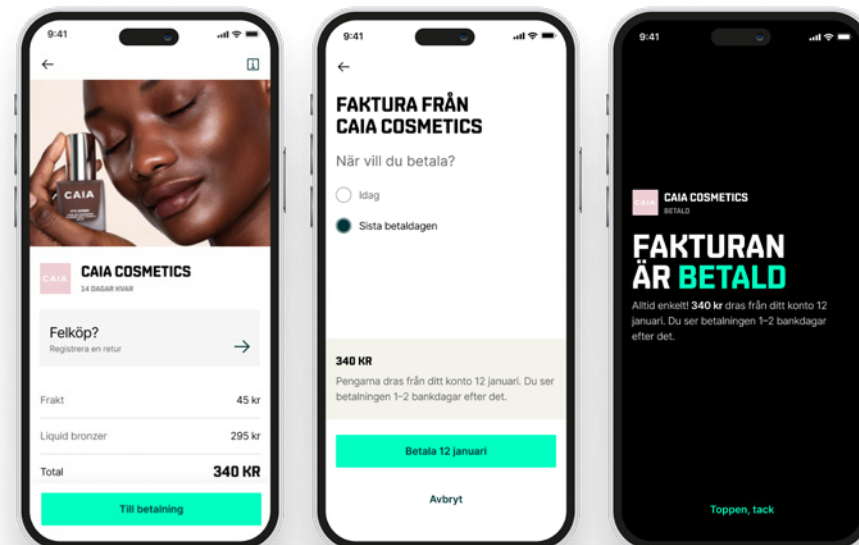
## Sustainable and sound lending

In addition to reducing the risk of insolvency, the aim of Qliro's assessments and processing is to ensure sustainable and sound lending practices that contribute to avoiding excessive debt. Qliro gathers data from public debt registers and uses calculations that show remaining living expenses in order to offset this risk. Furthermore, Qliro applies strict rejection criteria and limits that ensure that particularly vulnerable segments are not granted credit, regardless of credit risk.

Qliro works actively to avoid its existing customers becoming insolvent. Customers that fail to make payments in accordance with the terms and conditions are monitored and managed with internal resources. Such management includes customer contacts through a range of different channels, such as the mobile app, push notifications, text message, email and/or by

telephone. Development of digital functions and the app are important factors that facilitate for Qliro's customers to pay on time. The app includes the option to connect to a bank account in order to make payments, while a pre-selection option ensures that bank payments are always made on the due date. There is also an option to delay the payment date for invoices by another ten days directly in the app. If a customer is temporarily struggling to make repayments, there are established guidelines for managing this to avoid unnecessary unpaid and overdue credits, e.g., by granting a payment-free month.

Qliro's personal loans are primarily marketed through Qliro's digital channels, which means that Qliro knows its customers well, since more than 95 percent of all personal loan customers are previous Pay Later customers. Qliro's database for purchasing history and Pay Later payment patterns provides critical information for making responsible credit checks for personal loans.



By developing intuitive digital services for its app, Qliro makes it easy for customers to manage their payments and reduces the risk that they will make a late payment.



## Helping avoid increased indebtedness in society

For several years, Qliro has reported debt levels and delinquency to public debt and default registers. This contributes to ensuring credit market transparency, which allows connected lenders to protect consumers from excessive debt in other contexts. This allows Qliro to contribute to shared records of indebtedness, and consequently to avoiding excessive debt in society as a whole.

## Progress in 2023

In 2023, Qliro worked towards ensuring more responsible lending in a number of ways. Important steps were taken to make it easier for Qliro's customers to make their payments on time. For example, continued development of digital functionality and information provision in Qliro's app has taken place. Qliro increased its capacity for managing customers with an increased risk of becoming insolvent.

The private loan product has undergone a number of changes to adapt it to the current macroeconomic situation. The maximum amount offered for private loans has been reduced from SEK 500,000 to SEK 200,000, and creditworthiness requirements have become more stringent. Furthermore, Qliro has calibrated its internal credit loss reserve models in order to increase the accuracy of the estimated credit risk in the portfolio.

## Combating corruption, money laundering and financing of terrorism

Qliro has zero tolerance for corruption, money laundering and financing of terrorism. Corruption poses serious legal and reputational risks. Qliro is exposed to corruption through risks such as fraud, money laundering, financing of terrorism, bribery and conflicts of interest. Qliro's anti-corruption work is based on the company's internal policy documents. Combating all forms of corruption is an extremely high priority, and alongside the rest of management, the CEO has overarching responsibility for carrying out preventative work and ensuring that the right resources, processes and control systems are in place. As a credit institution in accordance with LBF, Qliro is subject to the Act on Measures against Money Laundering and Terrorist Financing (2009:62) and must, before a business relationship is established with a customer, follow Know Your Customer (KYC) procedures to identify the customer and assess the risks associated with the customer. Continuous KYC, including transactions made by customers, is necessary to identify any suspicious activity that could entail money laundering or terrorism financing. Qliro will decline transactions that the company suspects, or has reasonable grounds to suspect, may involve money laundering or financing of terrorism. Qliro has adopted internal policy documents and procedures to comply with the Act on Measures against Money Laundering and Terrorist Financing and associated stipulations.

Policies governing this area include:

- Code of Conduct – contains principles for ethical and responsible behavior.
- Conflict of Interest Policy – describes how employees and representatives of Qliro should respond to potential conflicts of interest.
- Anti-Money Laundering and Counter-Terrorism Financing Policy – describes the reasoning behind Qliro's measures to prevent money laundering and terrorism financing.
- Whistleblower Policy – ensures that Qliro's employees can and know how to report sensitive issues such as discrimination without the risk that it could lead to negative treatment.
- Merchant Policy – fundamental principles and methods Qliro uses to ensure that all merchants, both new and existing, meet Qliro's requirements regarding counterparty risk, volume, profitability and ethics.
- Governance Policy – ensures effective internal control and management in accordance with regulatory requirements as well as the internal framework, in order to have effective and independent control functions and for the Board's ability to effectively monitor Qliro's operations.

## Code of Conduct

Qliro's Code of Conduct and guidelines are fundamental and cover all employees, senior management and Board members. All employees have access to the Code of Conduct through Qliro's intranet, and the Code forms part of mandatory training that all employees are required to undertake. Qliro has three levels of control functions, the three lines of defense, to manage corruption risks and ensure that Qliro does business and enters into business relationships on the basis of value creation and on ethical grounds. For more information on current lines of defense, see page 55.

The key to this work is to continuously monitor trends, patterns and monetary flows to prevent the business from being exploited for purposes of money laundering and financing of terrorism, for instance. In the event that suspicious patterns and transactions arise, reporting routines are in place. In collaboration with the Swedish Fintech Association and the Swedish Police Authority, opportunities are available to share experiences and information on money laundering and fraud in the banking sector.

It is critical that employees are aware of the risk of corruption and the reporting routines that are used. Accordingly, it is a priority to continuously educate employees on how corruption can be combated and provide them with skills that make it easier to see the warning signs. A number of online courses are available to provide support and guidance. For example, Qliro offers ten mandatory online courses, five of which are considered especially important, and participation is continuously reported to the Board.





The courses are:

- Qliro's Code of Conduct, which is also included in onboarding for all new employees
- Introduction to data privacy
- Compliance onboarding
- Managing conflicts of interest and anti-corruption
- Risk control awareness

#### **Anonymous whistleblower function**

Employees wishing to report improper activity anonymously can use the whistleblower function on Qliro's intranet. This information is also included in mandatory training on Qliro's Code of Conduct.

#### **Customer privacy and information security**

On a daily basis, Qliro processes a large volume of personal data on the consumers who use its services. The EU has adopted the General Data Protection Regulation (GDPR, Regulation 2016/679/EU), which governs Qliro's ability to collect, store, share and otherwise process information on consumers. Qliro's compliance with GDPR is also monitored by national data protection authorities. Failure to follow GDPR can lead to extensive financial sanctions for Qliro.

Qliro works continuously to safeguard customer privacy in an effective and robust way. Qliro has established a privacy organization that, together with other expertise, is brought in at an early stage in new processes where personal information is handled to ensure that data is processed legally and that necessary security measures are in place.

All business entails risks, and Qliro is exposed to operational information risks, alongside organizational or product changes that could potentially impact information security. Governance and control are therefore critical minimizing exposure. Proactive risk and incident management ensures a high level of protection of information and assets across all aspects of operations.

It is also essential, with the help of control systems, to identify abnormal transactions and monetary flows, and to adequately manage and monitor internal access levels for processing information and providing services. All Qliro's employees are responsible for reporting incidents in accordance with the relevant instructions. Qliro's information security and risk management function (ISRM) is responsible for publishing the latest versions of policies and guidelines on customer privacy and information security on the intranet for easy access.

## FOCUS AREA 3

# Attractive employer



Qliro has a high level of ambition with regard to being an attractive employer. Qliro is defined by its results-oriented organization and a modern, diverse and inclusive culture that promotes learning and the health, safety and well-being of our employees. In order to achieve this, performance review and competence development procedures are well established in the organization. Another important foundation of this ambition relates to our shared work environment, which is characterized by showing consideration for each other and sound values.

### Diversity

Qliro's ability to attract, develop and retain employees with the right skills is a prerequisite for maintaining a profitable business. When recruiting, Qliro looks for a variety of skills and other qualities in terms of gender, age, etc. A conscious and active recruitment strategy allowed us to successfully compose a management team that includes 44 percent women in 2023, a trend that is also reflected in the high percentage of female managers throughout the organization.

Qliro's corporate language is English, which means that for several years we have been able to provide a workplace that welcomes recent arrivals to Sweden and those who do not speak Swedish. This has contributed to shaping our corporate culture, and allowed us to partake of a range of different perspectives and backgrounds on a daily basis in our processes and work. We have also actively contributed to increasing our diversity further by assisting 25 individuals to come to or remain in Sweden for work. In cases where the employees have moved to Sweden to work for Qliro, the company has covered the costs and provided support both to the individuals in questions and their families. This has contributed to enriching our already multicultural workplace with new perspectives and competencies.

Qliro does not tolerate any form of discrimination or harassment. It is critical to Qliro's success that we are a workplace where a wide range of different views, experiences and backgrounds can contribute safely. Our employees confirm that we have been successful in achieving this by giving us the highest rating in our employee engagement tool Winningtemp with regard to providing a workplace free from discrimination and harassment. In order to ensure this and clarify our expectations as early as possible in the employee journey, all new staff are provided training in our Code of Conduct as part of the onboarding process. This training relates to Qliro's values regarding equal opportunities, diversity and discrimination.

Qliro has a whistleblower function to report acts of discrimination or harassment. This function provides all employees with a way to report violations without fear of repercussions. Employees should also feel assured that reports are handled professionally. The whistleblower policy is available on Qliro's intranet and forms part of mandatory digital Compliance Onboarding Education. All employees are informed of and expected to adhere to Qliro's Code of Conduct.

It clarifies the obligations of employees and covers the following areas:

- Customer relationships
- Colleagues and working environment – including health and safety, human rights, the right to collective bargaining, fair pay, no discrimination by position or profession
- Relationships with suppliers, other business partners and competitors
- External communication and information processing
- Contact with authorities
- Whistleblower function
- Consequences of violating the Code

### Working environment

Qliro and its employees are jointly responsible for creating and maintaining a healthy work environment where every employee is appreciated and respected. Qliro follows an Instruction on the working environment, and has established a Committee for the working environment where employees can actively contribute to improving the physical and the psychosocial working environment, as well as employee development. The employee engagement tool shows that Qliro's psychosocial working environment and being a safe organization are aspects of the working environment that are rated highly by employees. This provides us with a good foundation for continuously addressing problems that arise. We also work proactively with employee wellbeing by providing our people with the tools to influence and improve their situation and career with Qliro. This is carried out in quarterly performance reviews, weekly check-ins, clear job descriptions, and the opportunity to provide anonymous feedback in our employee engagement tool. The feedback is actively reviewed and addressed by managers to ensure continuous improvement in the wellbeing of our teams.

### Risk management as an attractive employer

Qliro's risks as an employer mainly include:

- Risk of not being seen as an attractive employer
- Risk that gender equality and diversity initiatives are unsuccessful

Qliro is based in Stockholm, Sweden, a location where competition over tech staff is intense. Having highly skilled employees is central to achieving our strategic ambition, and being able to deliver and exceed the expectations of our collaboration partners and customers. Working conditions and compensation help to attract and retain employees, but it is even more important to have sound values and offer an attractive workplace with an inclusive culture



where employees have the opportunity to develop and take responsibility. Examples of benefits includes pension, flexible working hours, paid parental leave and wellness allowances. Through our weekly employee engagement tool, we continuously monitor questions relating to engagement, wellbeing, culture and leadership. These measurements serve as catalysts for discussions within and between functions and also provide input on where special measures or improvements may be needed.

#### Culture and values – crucial for Qliro as an attractive employer

At Qliro, we believe that all employees want to succeed and contribute. We believe that a strong corporate culture will result in greater engagement, higher productivity, increased creativity and more motivated employees. We also believe that it will facilitate cooperation between functions, generate more innovation, and ultimately help us realize our strategy

and ensure better results. We have been successful in building this culture, as we had the privilege of welcoming around ten former employees back to Qliro in the year.

We also believe that our values need to be firmly embedded in the organization, as well as useful in the day-to-day work of our staff. Accordingly, in 2023 we involved the entire organization in developing and clarifying our values so they reflect the organization Qliro is and wants to be from 2023 onwards. This means that, based on employee input, we have developed core value statements that specify and provide examples of behaviors that are in line with our values, and will help the individual to become better at their job and make a clear contribution to Qliro's progress. Our values are actively referred to in performance reviews, the day-to-day work, job descriptions and salary reviews in order to clarify the expectations placed on our employees and the tools they can access to take responsibility for their development.

#### Qliro's values:

COLLABORATION	CURIOSITY	EMPOWER	ACCOUNTABILITY
<ul style="list-style-type: none"><li>• I partner up with colleagues, other teams and customers to deliver great results in an effective and efficient way.</li><li>• I create win-win solutions together with others by embracing and building on their ideas.</li><li>• I proactively share relevant information in a simple and transparent way.</li><li>• I never hesitate to give support in order to deliver a great experience for our customers and partners.</li></ul>	<ul style="list-style-type: none"><li>• I am curious about Qliro's competitive landscape as well as the challenges and priorities of my colleagues and customers.</li><li>• I seek both internal and external information to be able to drive improvements.</li><li>• I test new things, maybe fail, learn, share and make it great next time.</li><li>• I strive for excellence within in my area to support building Qliro into the greatest company within our industry.</li></ul>	<ul style="list-style-type: none"><li>• I celebrate with my colleagues and share our success stories.</li><li>• I empower my colleagues, teams and merchants to test new things, fail and then help them grow.</li><li>• I believe in and promote diversity, equality and inclusion.</li><li>• I provide constructive feedback as often as possible to support personal and professional growth.</li><li>• I encourage and empower our colleagues and teams to execute at full speed, to reach a state of flow as often as possible.</li></ul>	<ul style="list-style-type: none"><li>• I keep myself updated on Qliro's targets and priorities to ensure that what I do aligns with them.</li><li>• I continuously seek to improve our existing processes and policies, while also ensuring that we adhere to them.</li><li>• I am the owner of my own development, seizing opportunities available to me.</li><li>• I ensure that my work contributes to Qliro being perceived as a responsible company.</li><li>• I take full responsibility for the quality and efficiency of my delivery.</li></ul>

## Qliro's business culture



### Leadership

Leadership plays a key role in Qliro's efforts to create a successful culture and promote positive behaviors. Our appointed leaders are key to improving performance in their respective areas of responsibility, promoting collaboration within and between functions, and supporting the employees in achieving their full potential.

Some of the many ways Qliro works with leadership include:

- Our leader forum where the organization's formal and informal leaders meet regularly to share information about Qliro's progress as a company, in terms of our strategy and financial targets. We also train managers in processes and leadership, discuss topical subjects and provide networking opportunities and offer team development for our leaders as a distinct group. Our leader forums meet regularly in the form of monthly get-togethers at our offices and over a number of full days at other locations for more focused work several times per year. This structure positive effects on collaboration between the various functions and contributes to supporting internal mobility.
- This represents a strong People function that supports Qliro's leaders and helps them develop their teams in line with what Qliro and the employees need at strategic and operational level.
- Qliro also evaluates leaders annually in a process where leaders receive feedback from their teams and are given the opportunity to self-evaluate. This forms the basis for a conversation with their line manager and People to determine an individualized development plan for the individual leader over the coming year.

### Employeeeship

Employeeeship is Qliro's way to enable all employees to grow and take responsibility and initiative for their own and Qliro's results, but also to provide the right support for them as individuals. Employeeeship is also important because it demonstrates our focus and commitment to everyone who works at Qliro. We are all important for the creation of a successful culture. We work actively with employeeeship through the continuous evaluation process with individual employees, which addresses goals, progress, targets and wellbeing in order to ensure that our employees know what is expected of them and have access to the tools they need.



## Transparent organization

In order to ensure ownership, participation and accountability, employees must be kept informed of and understand the business. Only then will they make the right decisions, which builds confidence and is key to delivering on other strategic and cultural dimensions.

Some of the ways we build a transparent organization:

- Company information is shared at monthly employee meetings, through brief updates on Slack or via email or on our intranet.
- Brief updates through Slack when Qliro is in the news, in connection with job opportunities, success stories, personal reflections, knowledge sharing, customer feedback, etc.

All employees are encouraged to participate and share information as well as actively seek out information. These updates create engagement and ensures inclusion.

## Learning organization

To maximize performance in today's high-speed society, people and organizations have to constantly surpass themselves. We believe that one way to accomplish this is to develop a culture and organization that support continuous learning and the personal development of our employees. Creating a learning organization depends on the other four focus areas. It is a continuous process and is built up over time.

Initiatives in the area:

- Structured customer and merchant feedback to the organization to continuously improve us and our offering.
- Leadership and employeeship training, which are good platforms for creating opportunities for learning, information sharing and collaboration.
- Visualized and discussed our vision for personal development and career building at Qliro, which largely involves learning and personal development.
- Clearly communicated and visualized job rotation as a way to inspire our employees to develop and learn at Qliro.
- All employees are offered a number of digital courses about Qliro. Some of them are mandatory and the results are tracked and reported to the Board of Directors.

## Results 2023 in the area Attractive employer

The likelihood of recommending Qliro as an employer (e-NPS) increased from +23 to +30 on average (on a scale from -100 to +100). For the comparative group Swedish tech companies, the e-NPS value averaged +14.

All sub-categories measured in our continuous employee engagement tool show stable results. All categories are above average compared to the comparative group. A new category in the employee engagement tool relates to psychological safety, which is one of the areas where Qliro receives the highest rating from its employees. Our continuous feedback culture and improved incident management contributed to there being no whistleblower incidents reported in the year.

## Results of Qliro's employee survey

Scale of 1-10	2023	2022
Leadership	8.3	8.4
Meaningfulness	7.6	7.7
Team cohesion	8.6	8.5
Participation	7.8	8.4
Psychological safety	8.2	-
<b>Total</b>	<b>7.9</b>	<b>7.9</b>

## Ambitions 2024

In 2024, the focus will be on strengthening our leadership and employeeship to enable expansion and scale-up.

Some of our focus areas include:

- Achieving an eNPS of over 30 at company level and continued high results across other dimensions in our employee engagement tool.
- Strengthening the feedback culture that we have started to build through continuous training for our leaders and employees.
- Increase awareness of Qliro's strategy and how all employees are connected to it.
- Strengthen intra-function collaborations.
- Ensure that our processes and culture are adapted to welcome even more international colleagues and facilitate the opening of offices in other countries.
- Continue to ensure that we have a structured, data-driven and unprejudiced recruitment process that attracts the top talent.

### Distribution, average number of employees



2023	Women	Men	Total
Below 30 years old	36	34	70
30–50 years old	55	90	145
Over 50 years old	4	6	10
<b>Total</b>	<b>95</b>	<b>130</b>	<b>225</b>

### Distribution, managers



2023	Women	Men	Total
Below 30 years old	0	0	0
30–50 years old	15	23	38
Over 50 years old	1	2	3
<b>Total</b>	<b>16</b>	<b>25</b>	<b>41</b>

### Distribution, executive management



2023	Women	Men	Total
Below 30 years old	0	0	0
30–50 years old	2	5	7
Over 50 years old	0	0	1
<b>Total</b>	<b>2</b>	<b>5</b>	<b>8</b>

### Distribution, Board of Directors



2023	Women	Men	Total
Below 30 years old	0	0	0
30–50 years old	0	2	2
Over 50 years old	1	2	3
<b>Total</b>	<b>1</b>	<b>4</b>	<b>5</b>



## Auditor's opinion regarding the statutory sustainability report

To the general meeting of the shareholders in Qliro AB (publ.),  
corporate identity number 556962-2441

### Engagement and responsibility

It is the board of directors who is responsible for the sustainability report for the year 2023 on pages 24-37 and that it is prepared in accordance with the Annual Accounts Act.

### The scope of the examination

Our examination has been conducted in accordance with FAR:s auditing standard RevR 12 The auditor's opinion regarding the statutory sustainability report. This means that our examination of the statutory sustainability report is different and substantially less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinion.

### Opinion

A statutory sustainability report has been prepared.

Stockholm 18 April 2024

KPMG AB

Mårten Asplund

Authorized Public Accountant