



# Contents



## Our sustainability commitment

As a global technology company, Crayon is in a unique position to truly make the world a better place.

We do not take this responsibility lightly and I am incredibly proud of our team that has set big, bold targets in our global environmental, social, and governance (ESG) strategy. Our innovative approach to ESG is outlined in the following pages and I'm excited to showcase our work.

I recognize that the tone of a company comes from the top, which is why I want to share what ESG means to me personally.

I have long been passionate about environmental issues. This enthusiasm partly stems from growing up in the shadow of the beautiful Cascade Volcanos in California. It's also because, early in my career as a young intern, I had an idea to use solar panels to reduce my employer's costs and thus save jobs. The result of that experience and the support I received from senior management has stuck with me, always. It also made me realize that no matter what level you are in the organization, you can make a difference.

Then there's the impact of my son Conor, who was born with challenges that inspired me to help create an AI-based solution to detect his potentially fatal condition. Conor also has autism and I've seen how the power of technology has shaped his well-being. Being his mom further grounded me in how important it is to realize that diversity is more than gender or ethnicity. Diversity colors how we think, process information, and view our world.

These life experiences are the foundation of my desire for Crayon to be a leader in ESG.

### Setting the direction

I firmly believe that ESG leadership starts with our own journey as a company. I want to thank everyone in our organization, including those in all our companies, for your hard work and dedication in addressing the ESG opportunities and challenges we face. Many of you volunteered to support our ESG initiatives, and I'm humbled by your commitment.

We believe in the power of technology to drive the greater good. As we grow our ESG initiatives, we are excited about how we can transition to a greener, more equitable, and more inclusive society. Our first consolidated ESG report sets our direction and defines our goals.

We have three big ambitions: Championing diversity, managing greenhouse gas (GHG) emissions toward net zero, and leading in ESG product development.

We have set clear targets for gender equality and are expanding how we track diversity beyond gender. We are also taking accountable and transparent actions to achieve net zero. Therefore, we have set a medium-term target for GHG emission reductions in parallel with making our commitment to establish validated science-based targets. Finally, as we embed ESG into our operations, we will develop this learning to help customers to reach their own sustainable development goals.

### Enabling human-centric technologies

Our business model is fundamentally supportive of sustainable development. Our role as a global partner helps our customers achieve their objectives through the development of new technology solutions, whether these goals relate to cost reduction, integration of artificial intelligence (AI), or cybersecurity. We are

already using data, machine learning (ML), and AI to support our customers' ESG initiatives. By strengthening our ESG foundation, we have identified opportunities to merge this framework into our technologies.

This approach enhances our position as a visionary solutions provider for the inevitable transition to a lower-carbon future. For example, optimizing our customers' carbon management is a natural extension of the cost optimization services we have been providing for the last 20 years, and leads seamlessly to our sustainable FinOps approach. ESG innovation is the catalyst that not only inspires new products and services but also generates measurable societal impacts that go beyond simple profits.

### Driving global innovation

At Crayon, we are always changing, always driving innovation, and always supporting our employees to do more. Our focus on ESG strengthens this thinking and highlights the importance of diversity and inclusion, critical components in creating an innovative company. The ambition to reduce our carbon footprint, both now and in the future, comes from the commitment of our people.

I often refer to these wonderful people as our Crayon Family. I'd like to thank each and every one of them, from our interns to our Board of Directors, for their unwavering dedication and support of our ESG endeavor. As we mark our 20th anniversary, it's been an impressive journey and I am excited to see what we accomplish in the years to come.

Thank you.

  
Melissa Mulholland, CEO



● ● **We must continue to put our people first; that is how we attract and retain the brightest minds to work with us on this vital journey of promoting environmental responsibility and creating a more equitable society.**

– Melissa Mulholland  
CEO

# Our big ambitions



People

By 2027:  
40% women

By 2024:  
Voluntarily track diversity  
beyond gender and set  
targets globally

Planet

By 2030:  
Reduce GHG  
emissions by at  
least 40%

By 2024:  
Complete Science Based  
Target Initiative (SBTi)  
Validation process

Prosperity

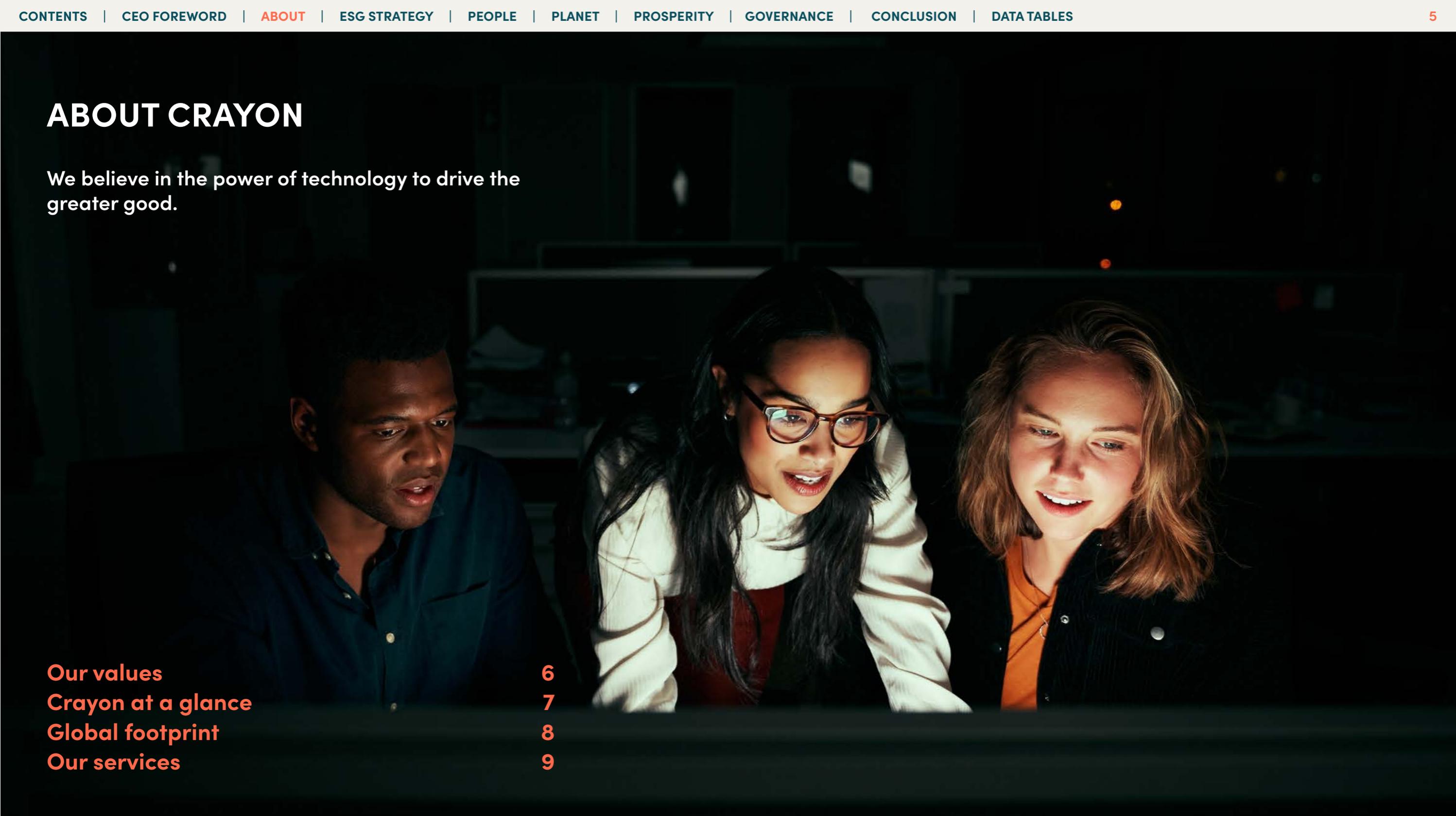
By 2027:  
Recognized leader  
in ESG products  
and services

By 2025:  
Recognized leader in  
Sustainable FinOps

# ABOUT CRAYON

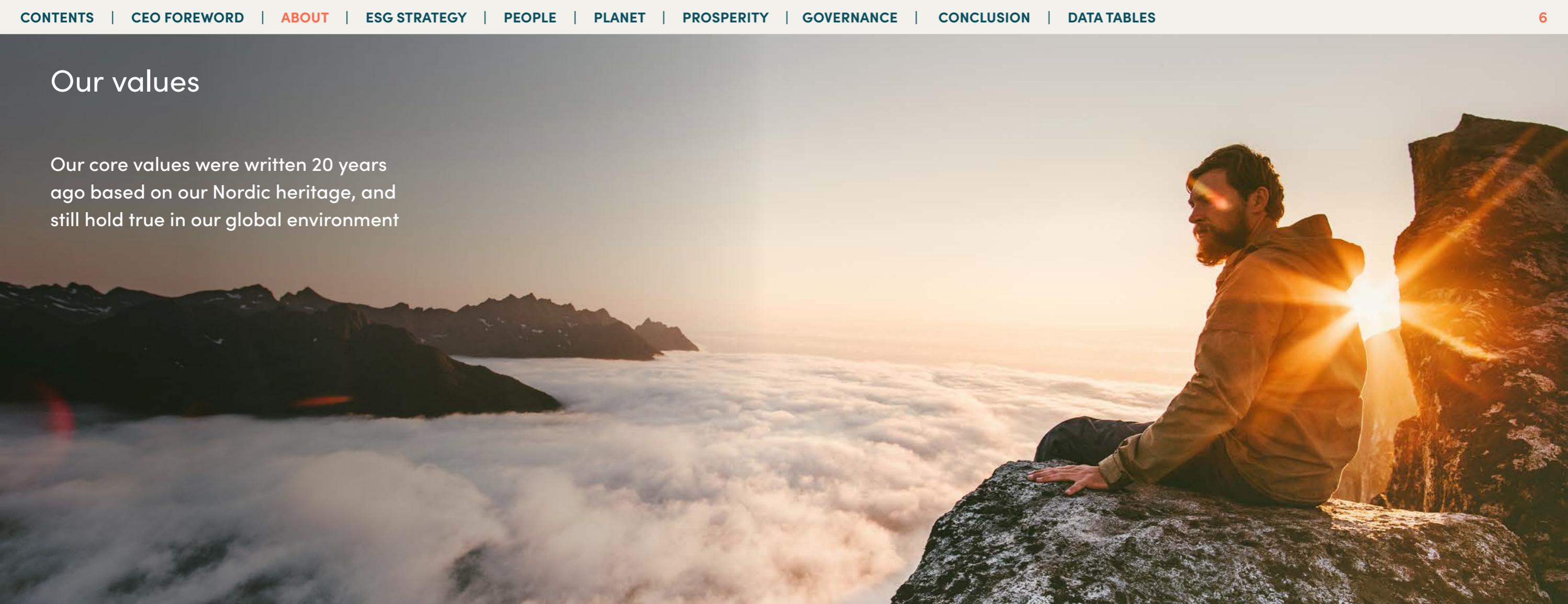
We believe in the power of technology to drive the greater good.

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## Our values

Our core values were written 20 years ago based on our Nordic heritage, and still hold true in our global environment



### INTEGRITY

With our actions we show integrity and we are accountable for our actions and inactions

### QUALITY

What we do, we do with excellence and better than anyone else

### PACE

We are customer focused and act and execute with urgency

### AGILITY

We innovate through continuous improvement and adapt quickly to change

## Crayon at a glance

**23%**

The average we typically save in IT costs for our customers

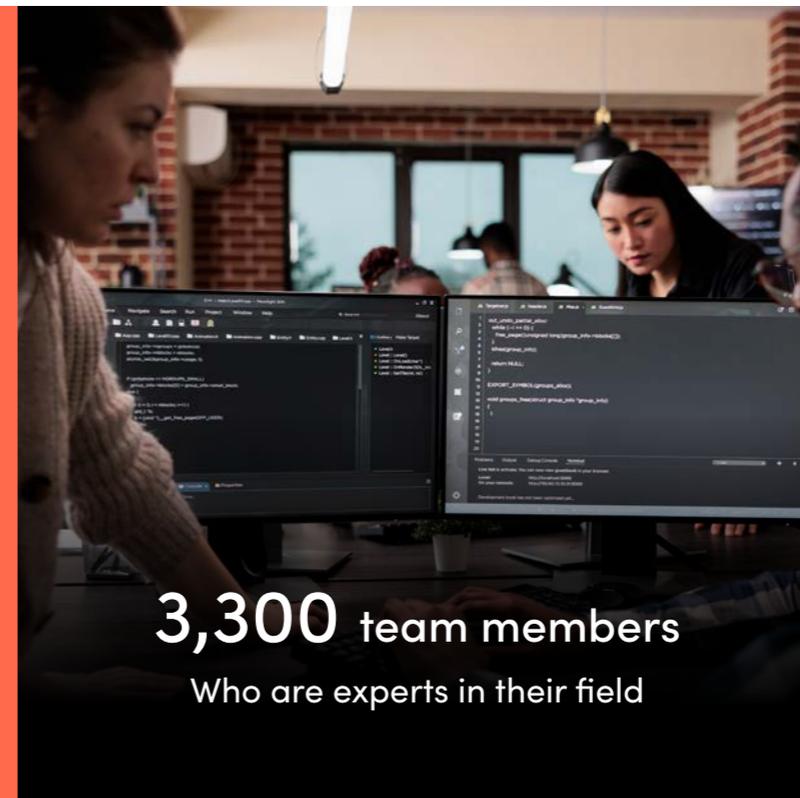


**80%**

Global market coverage

**20<sup>th</sup>**  
**Anniversary**

Founded in 2002



**3,300** team members

Who are experts in their field

**45**

Countries

**80,000** customers

From SME to large enterprise, with a high share of public sector

**Publicly listed**

On the Oslo Stock Exchange

# Global footprint



**Nordics**  
Norway, Denmark, Finland, Iceland and Sweden

**Western Europe**  
Austria, France, Germany, Ireland, Netherlands, Portugal, Spain, Switzerland and United Kingdom

**Central and Eastern Europe**  
Bulgaria, Czech Republic, Estonia, Latvia, Lithuania, Macedonia, Poland, Romania, Russia, Serbia and Ukraine

**North America**  
Canada and United States

**Asia**  
India, Malaysia, Singapore, Philippines, Sri Lanka, Thailand, Republic of Korea, Hong Kong, Indonesia and Japan

**Australia and Oceania**  
Australia and New Zealand

**Middle East**  
United Arab Emirates, Saudi Arabia, Oman and Qatar

**Africa**  
South Africa and Mauritius

Crayon is a customer-centric innovation and IT services company that believes in the power of technology to drive the greater good.

Whether it's licensing, software and cloud economics, security, modern workplace, or data and AI, we create business value for our customers and partners. Our approach helps them to thrive today and scale for tomorrow.



# Our services

We optimize your IT estate to help you innovate with expertise you can trust. Our customer-centric services create value for your business to thrive today, and scale for tomorrow.

### SOFTWARE AND LICENSING

Optimize ROI on software investments

### CLOUD SERVICES

Accelerating the cloud adoption to maximize business value

### FINOPS

Use data to maximize business value

### MODERN WORKPLACE

Embrace new ways of work

### DATA AND AI

Unlock the value of data

### CYBERSECURITY

Protecting your data

## This is our three-step framework to optimize IT spend

1

### REDUCE IT SPEND

Reduce or rightsize spending based on customer's needs and capabilities

2

### IMPROVE BUSINESS VALUE

Enable customers to maximize every dollar invested through value-added services

3

### INVEST IN TECHNOLOGY

Invest in technology to innovate and accelerate business value

# ENVIRONMENTAL, SOCIAL, AND GOVERNANCE STRATEGY

We created a foundation for our ESG strategy that enables us to be ambitious and to report transparently.

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## Our strategy

I believe that Crayon's role as an innovative technology company provides both an opportunity and a responsibility to take the lead in finding solutions that create a more sustainable and equitable society. Every day, my ambition is to enable, unlock, and accelerate our positive impact through ESG; I hope that when you read this report, you will recognize that we are both bold and realistic in our ambition to lead in this area.

### Involving the entire organization

This is the first year Crayon has presented its global ESG initiatives in this consolidated format. We wanted our ESG strategy to incorporate the Norwegian spirit of 'dugnad', or community work; we therefore began with a companywide invitation to participate. The response was both positive and impressive, with colleagues from more than 40 countries volunteering to participate.

The key messages were that our ESG strategy must be long-term and integrated into our business. Furthermore, the overall company structure must align with and support this initiative to generate the maximum impact.

I am impressed by the momentum we have achieved toward incorporating key ESG outcomes within Crayon. This progress is thanks to strong strategic direction from the CEO, the board of directors, and the executive management, supported by enthusiastic efforts from our teams throughout the organization.

### Creating a sustainability culture

Crayon has reported its GHG emissions for the company's headquarters for over a decade. Our subsidiaries and affiliated companies also promote sustainability initiatives, with many recognized in their local communities for the positive work that they do.

As we evolve and grow, we understand the importance and impact of combining the strengths of these local activities into a comprehensive and aligned global strategy. We are aware that when it comes to developing our ESG role and purpose, there is still much to be done and plenty for us to learn. We welcome this opportunity.

In addition to engaging our employees, we worked with KPMG Sustainability to conduct an independent materiality assessment and stakeholder review. This project aimed to identify and understand our material impacts. We also enlisted specialized climate change consultancy Cemasy to support our first global carbon reporting.

We take a growth mindset toward ESG and work closely with partners to ensure Crayon makes an impact, constantly challenging ourselves to do more.

### Increasing governance and accountability

Integrity is a core value that defines how we operate. This value is more than a vague aspiration, it is a key part of our business strategy and reflects our corporate culture.

Consequently, we created a strong governance structure at the board level to ensure the success of our ESG strategy.

The Audit Board committee expanded its responsibilities to include risk. Crayon also recruited experienced global integrity, risk, and compliance personnel, as well as appointing a central ESG team to support our organization. We made this investment because it builds on our core value and positions us for growth. It also enables us to take what we

learn, innovate with that information, and then make a sustained impact on ESG adoption globally. By incorporating integrity within our ESG strategy, we generate further competitive advantages for Crayon. Ultimately, a positive approach to ESG supports our employees, customers, and business partners in the transition to a more sustainable future.

### Generating transparent and reliable reporting

Our ESG strategy and report center around 12 material issues and six defined development goals from the United Nations (UN). For every identified material issue, we specified targets for the next few years. While we support longer-term commitments, holding ourselves accountable to these short-term goals is the most responsible way to demonstrate transparency to our stakeholders.

Finally, this report is an opportunity to acknowledge and thank the many employees who have stepped up to support the different aspects of our ESG strategy. We strongly believe the only way Crayon can achieve these targets is to work together, and this report demonstrates the power of 'dugnad' in action.



● ● **By incorporating our core value of integrity within our ESG strategy, we generate further competitive advantages for Crayon.**

– Abbey Lin  
Chief ESG and Integrity Officer

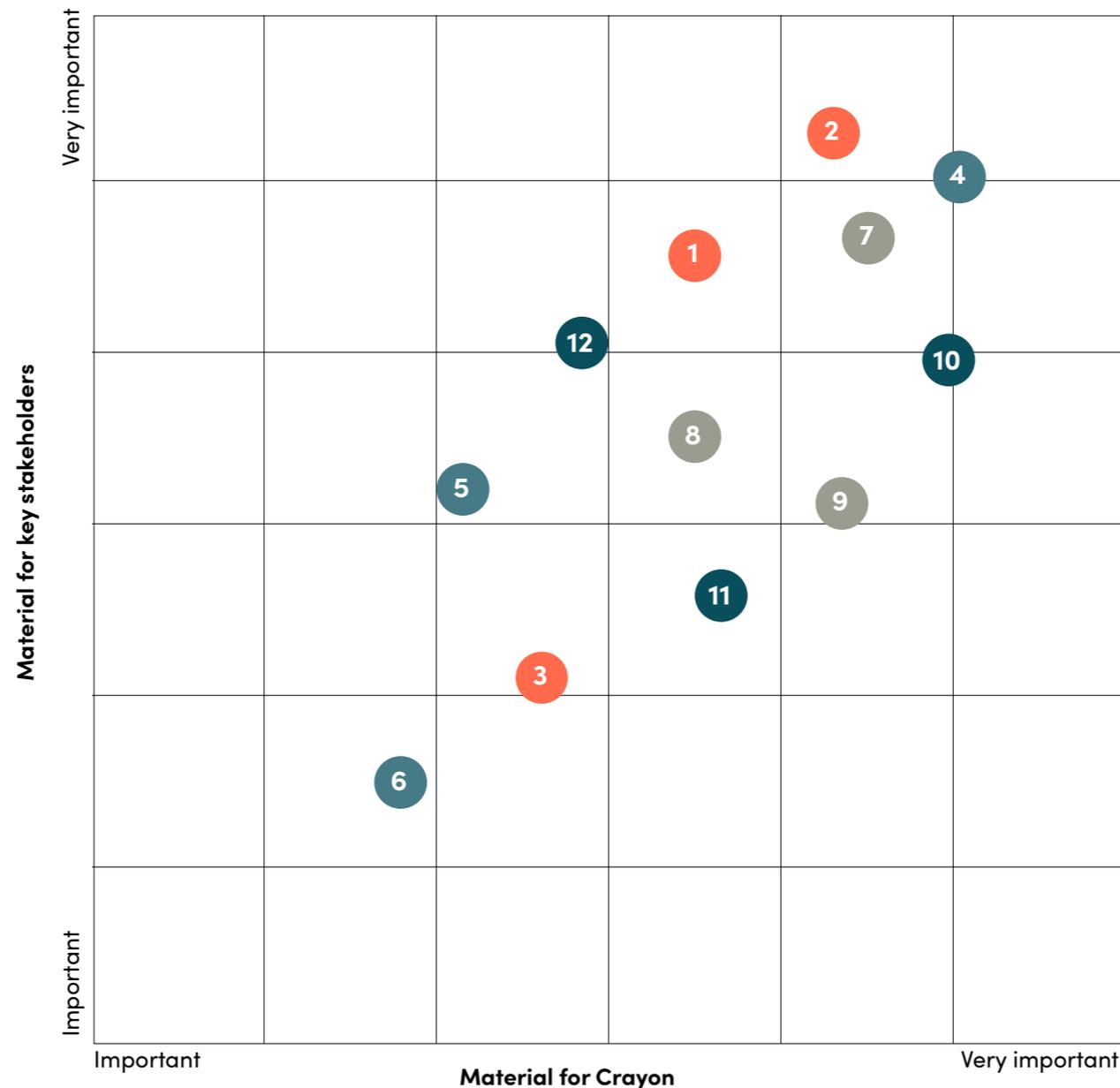
# Materiality analysis

In 2021, Crayon engaged KPMG Norway to undertake a detailed review, called a materiality exercise, aiming to identify critical issues for both our business and our stakeholders. This study identified potential material topics, ranking them through peer benchmarking, document reviews, internal and external interviews, and SWOT analysis, together with a detailed evaluation of expectations from investors and other stakeholders.

The materiality exercise focused on four areas: People, Planet, Prosperity, and Governance, in line with the World Economic Forum Reporting Framework.

The team conducted interviews with employee representatives and senior management from different Crayon locations. Further external interviews engaged various stakeholders, such as international technology and investment experts, customers, suppliers, investors, and business partners. The goal was to identify challenges, opportunities, and expectations in the development of Crayon’s sustainability strategy.

These interviews identified several material topics resulting from our operations. The senior management team ranked and selected the most important issues, which the ESG board committee then confirmed. The chosen topics are now integral parts of our sustainability strategy, with this report discussing these factors in greater detail.



## People

- 1 Employee well-being
- 2 Diversity, equity, and inclusion
- 3 Supporting local communities

## Planet

- 4 Race to net zero
- 5 Environmental management
- 6 Green IT and circular economy

## Prosperity

- 7 Products and services for ESG
- 8 Innovating for social impact
- 9 Responsible AI

## Governance

- 10 Integrity, risk, and compliance
- 11 Third-party management
- 12 Data privacy and cybersecurity

# Governance structure

Crayon set up a governance structure to integrate ESG into its business operations. Factors such as sustainability, risk, and compliance have full representation at the executive management level to ensure maximum integration, visibility, and accountability.

Crayon’s Board of Directors established an independent ESG board committee with overall accountability for the company’s long-term sustainability strategy. Chaired by Jennifer Koss, the committee includes Grethe Vikaas, Mette Wam, Christian Ødemark, and Brit Smestad.

- The key objective of the ESG board committee is to ensure that sustainability fully integrates with Crayon’s long-term business strategy.

## Supporting the board

The ESG committee supports the Board of Directors in safeguarding the interests of the company’s key stakeholders, including employees, customers, shareholders, business partners, governments, and civil society.

This committee has responsibility for ensuring that the company’s management reviews and assesses climate-related risks and opportunities. Any identified

material ESG risks then pass through to the Audit and Risk committee and the main Board of Directors, as part of the regular risk review process.

“A separate stand-alone board committee gives sustainability the attention it deserves, along with providing effective oversight of the continued progress toward our ESG goals. With Jen’s international experience and ambitious views on ESG, she was a natural choice to lead this committee,” said board Chairman Rune Syversen.

## Maintaining ethics and compliance

To ensure Crayon maintains the highest levels of ethics and compliance, the Chief ESG and Integrity Officer participates in the Audit and Risk board committee on topics related to risk and compliance, along with the Chief Financial Officer. The Chief ESG and Integrity Officer reports directly to the Chairman of the Board of directors and indirectly to both the Audit and ESG committees.

- Our governance structure emphasizes the importance we place on the conscientious conduct of our operations.

## Applying governance rules

Our governance rules apply to Crayon worldwide, along with all subsidiaries and affiliates in which we own more than 50% of the voting controls. We endorse the Norwegian Code of Practice for Corporate Governance (Norsk anbefaling for eierstyring og selskapsledelse), issued by the Norwegian Corporate Governance Board.



**Rune Syversen**  
Chairman of the Board and Co-Founder

●● We need to challenge the status quo when we think about ESG. We need to be ambitious and not afraid to think outside the box.



**Jens Rugseth**  
Board Member, Co-Founder, and Chair of the Audit and Risk Committee

●● Managing merging risks around ESG is vital, given the impact of climate change. We see opportunities for new sustainability products and services, and we are excited about the role Crayon can play in supporting our customers in this journey.



**Jennifer Koss**  
Board Member and Chair of the ESG Committee

●● Our responsibility within the board is to ensure Crayon management continues to prioritize ESG and fully integrate sustainability into our operations.

# Reporting guidelines

We are determined to ensure our ESG responsibilities convert into positive outcomes, which is why we have set stringent targets to focus our activities. Note that this report uses data from 2021, although further information and targets may also cover past, present, and future events.

The information in this document is in reference to Global Reporting Guidelines (GRI) reporting standards, part of the World Economic Forum Report framework. The appendix provides tables with links to the indicators for GRI, along with Sustainability Accounting Standards Board (SASB), and the UN Global Compact (UNGC).

Crayon joined the UNGC in March 2020 and we fully support its 10 key principles. The appendix provides further details of our commitment to these guidelines.

<sup>1</sup> Carbon reporting, training, company donation, and voluntary figures include all Crayon entities and related companies, apart from rhipe, Parallo, and emt Distribution, which Crayon acquired in November 2021. Next year's report will include figures for these organizations.

# Our UN Sustainable Development Goals



# PEOPLE

We are a people-first business, whether that means taking care of our employees or helping the local community in which we work.

- People 17
- Employee well-being 18
- Diversity, equity, and inclusion 19



# People

As a people-centric organization, our employees are Crayon's greatest strength. Our incredible growth over the last few years has seen the company's diversity increase, with each new hire bringing fresh perspectives and ideas that shape who we are today. Yet we remain true to our Nordic culture of equality, transparency, and trust throughout our global operations.

- ● We value our employees and are proud of our minimal staff turnover levels. In 2021, turnover was just 1.7%, which is low when compared with industry statistics.

New employees who join Crayon often remark that our culture is unique. We have bold ambitions to grow as a company and achieve our goals over the next few years. Even so, we maintain a flat organizational structure, where we empower all team members to feel comfortable and confident in reaching out to all levels of the company. Collaboration enhances our competitive advantage, so we want every employee's voice to be heard.

We value transparency and openness, and firmly believe that different perspectives are vital for innovation and success.

Working together, we deliver our company vision of implementing technology for the greater good.

We support the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the International Bill of Human Rights, and the International Labor Organization (ILO) core conventions. These commitments support our promise to protect our employees' right to collective bargaining and freedom of association, along with the elimination of forced labor, child labor, and employment discrimination.

We are proud of our achievements over the last 20 years and commit to continued investment in our people. Our 3,300 employees come from 45 countries, with many different backgrounds, including more than 90 nationalities. We believe that creating an environment where our people thrive is critical to driving the success of our business.

# 825

People hired in 2021

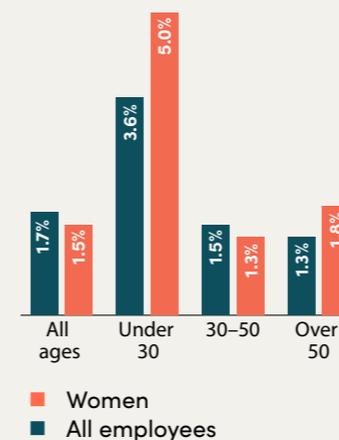
- ● We are a people-first organization. I joined Crayon when we had only six employees and I've watched it grow to the global business it is today. My goal is to retain the same Crayon family environment we had when we started to ensure every employee feels included and able to perform at their best.



**BENTE LIBERG**

**Role:** COO and Global Head of HR  
**Years at Crayon:** 20  
**Location:** Norway

## Turnover rate<sup>1</sup>



## Technical positions<sup>2</sup>



## Team members location<sup>1</sup>



- Asia-Pacific (35%)
- India (17%)
- Middle East and Africa (11%)
- Nordics (8%)
- United States (6%)
- Central and Eastern Europe (5%)
- Rest of Crayon (18%)

## Other positions<sup>2</sup>



<sup>1</sup> Team members includes temporary employees and contractors  
<sup>2</sup> Does not include Sensa and Rhipa

# Employee well-being

## Employee support

We believe we must do all we can to provide a positive environment for our people. The Covid-19 pandemic highlighted the need to establish new ways of working to support well-being and provide the tools to help individuals thrive. Right from the beginning of the lockdown, we made a commitment that we would not lay off or furlough any employees – a promise that we proudly kept. We prioritized our team members’ mental well-being and made great efforts to support all our staff through both personal and professional hardships.

We strive to improve the results of our employee feedback survey, which while positive, would benefit from an increase the global participation rate to ensure that all viewpoints are heard. As we rapidly expand, we will leverage this employee support across our countries and align our global benefits across the organization.

## Training and development

The technology sector is a fast-moving, innovative, rapidly evolving, and highly competitive industry. To ensure our continued success, we need to recruit, train, and retain the brightest and the best. Our staff development process starts with funding internships and apprenticeships to attract young individuals

into our company and the industry. We also make a conscious effort to help our people advance their careers and promote them from within the company where possible.

We also invest heavily in training our teams around the world, as seen through the recent launch of our universal, comprehensive management and talent training program for all employees. Previously, employee training and development was a local responsibility, but this new initiative will harmonize this delivery globally over the coming years. This unification includes enhanced management and talent-training programs for employees.

## Health and safety

The health and safety of our employees’ environment (HSE) is paramount for our business and Crayon commits to ensuring a healthy and safe environment for all staff. Sound safety and health practices are integral to our operations and Crayon complies with all local workplace safety regulations.

We continuously work to identify and mitigate any emerging HSE risks, and our employees can raise or report any health and safety issues or concerns through their line managers, our Human Resources teams, or anonymously, through a dedicated Integrity hotline. See how we support customers in their [HSE journey](#).



**46,290**  
Hours of training in 2021



**NINA JANORSCHKE**

**Role:** VP People and Culture  
**Years at Crayon:** 6  
**Location:** Germany

•• I strongly believe that our focus on employee well-being is the result of our values, our diverse workforce and our remarkable working environment. We are passionately aiming to have an impact on our organization by developing teams with big ambitions to reach their full potential, while providing a great human and cultural experience for all our employees.

### Employee well-being targets

- 2023** - Increase the annual Employee Feedback survey score by 0.5 percentage points (from 4.2 to 4.75 out of 5) and increase the overall global participation rate from 61% to 85%
  - Give employees a comprehensive overview of internal career and development paths
- 2024** - Launch enhanced management and talent-related training programs for all employees
  - Align global policies and benefits across the organization



## Diversity, equity, and inclusion

Crayon prides itself on its focus on diversity, equity, and inclusion (DEI). We value a diverse workforce and are committed to attracting, retaining, and promoting talent from all backgrounds.

The contributions of all our teammates are highly valued and are an integral part of our success. We ensure that Crayon's core values are rooted throughout the organization.

Diversity and inclusion aren't just slogans – they are vital imperatives for all businesses. Crayon increasingly competes on a global stage and cannot afford to ignore the valuable insights that a truly inclusive workforce generates. By fully appreciating the diversity of our society and our customers, we can better anticipate their needs and create sustainable solutions for the future that address those requirements.

### CRAYON'S PUBLIC STATEMENT ON DEI

**We advance diversity, equity, inclusion, and respect through education, hiring practices, and a positive workplace culture.**

**We achieve that culture by ensuring all individuals are treated fairly and respectfully and have equitable access to opportunities and resources.**

## Diversity, equity, and inclusion in numbers

50% of our board are women, as are 43% of our executive management team. In addition, we have an ambitious goal that women will make up 40% of our global workforce in 2027.

But we won't stop there. Diversity is about more than gender and gender identity. As Crayon continues to grow, our company must represent the full diversity of the countries in which we operate. The goal is to build a company where everyone is their authentic self at work and feels part of the Crayon family. Inclusion and collaboration must be fundamental attributes of the way we work today.

- We see diversity as more than gender and gender identity – we want to increase diversity in all forms throughout the company.

Crayon is committed to creating voluntary reporting of additional diversity metrics beyond gender, as allowed by local legislation. From this baseline assessment, we will set future targets for all forms of diversity. Crayon will also partner with DEI consultancies to help us achieve a more diverse and inclusive workforce.

### DIVERSITY

Acknowledging that each person is unique and recognizing our individual differences.

### EQUITY

Ensuring that everyone, regardless of individual differences or background, has a level playing field, so that all employees can perform and achieve to their maximum.

### INCLUSION

Directing organizational effort and practices, so that different groups or individuals with dissimilar backgrounds are culturally and socially accepted, welcomed, valued, and treated equally.

## Women across Crayon

Region	Women
United States	37%
Asia-Pacific	36%
Central and Eastern Europe	35%
Nordics	30%
India	26%
Middle East and Africa	24%
Rest of Crayon	31%
<b>Total Crayon</b>	<b>31%</b>

## Generations of women

37%

Women in the age group under 30

32%

Women in the age group 30–50

30%

Women in the age group above 50



**DOROTHEA MURPHY-THOMAS**

**Role:** Crayon Client Director, West  
**Years at Crayon:** 4  
**Location:** US

●● Crayon has a diverse team of talented and exceptional people across the globe. I had the honor of helping to establish the Crayon Culture Committee in the US, and I am co-lead on the Global DEI team this year. It is incredibly exciting to be part of Crayon's continued journey to create a culture that respects and values the diversity of its teammates, while providing a truly inclusive and equitable space for all to contribute.

### Diversity, equity and inclusion targets

- 2022**
- 100% completion of unconscious bias training.
  - External accreditation by an independent DEI certification body.
- 2024**
- Start measurement and establish global voluntary reporting of diversity metrics expanded from gender in 2022, in accordance with local legislation.
  - Using the baseline established, set further ambitious diversity targets based on voluntary reporting.
  - Grow or maintain SHE Index at 98/100.

## IN PRACTICE: Diversity, equity, and inclusion

### Singapore: Inclusive hiring practices in the Asia Pacific region

Crayon has implemented initiatives to recruit a more diverse and inclusive workforce in the Asia Pacific region. This initiative included a series of awareness workshops with non-governmental organizations (NGOs) in Singapore and the Philippines that focused on people with disabilities. These workshops covered important language and etiquette fundamentals, along with assistive technology to support a diversified workforce.

Thanks to these efforts, the Singapore office increased the proportion of its employees with a disability to 8% of the total workforce. In response to this initiative, the company received the Enabling Silver Mark Award from the Singapore Government, gaining national recognition for our best practices in disability-inclusive employment.



**OWEN VILORIA**

**Role:** Head of Finance - SEA  
**Years at Crayon:** 2  
**Location:** Singapore

### United States - Making diversity part of our DNA

In 2018, Crayon US founded an Employee Advisory Council, whose mission was to represent employees through feedback and evaluation of programs that would help drive employee success. In 2020, we built on this vision and founded the Crayon Culture Committee to drive education, awareness, and celebration, aligned to social and cultural observances.

By founding these employee-led committees, Crayon US has increased the number of new employees from diverse backgrounds by 50% over the past three years and more than doubled its diverse representation in management roles. These purposeful initiatives, goals, and forums have enabled employees to share their perspectives, recognize contributions, and further educate themselves on diversity, equity, and inclusion. This integrated approach is part of changing the makeup of our DNA from the inside out. We plan to build on this success, as our US office further implements its DEI policies.

•• I'm proud of the focus on diversity within APAC and that our Singapore office gained such prestigious recognition from the Singapore Government. It was a great honor to accept this award on behalf of Crayon.

### Germany: Diversity in nationalities

Crayon Germany decided that its DEI targets should widen the focus beyond the talent acquisition process and encompass a more comprehensive approach. Their goals included improving the gender ratio in management positions and fostering equal pay.

Crayon Germany's ambition, supported by our global headquarters, was to create a work environment in which all employees feel they belong - by being supported, valued, and respected. They emphasized DEI as a holistic core value and approach for all leaders within the organization. The result was an increase in workforce diversity to 20 different nationalities, with around 100 employees in Germany now speaking 19 languages between them. Both employees and customers recognize and appreciate this approach to diversity.

### Global: More women in management

In 2020, Crayon piloted a global leadership training program for women, as part of our efforts to appoint more women to management positions. This program focuses on identifying and strengthening participants' leadership skills while increasing their knowledge of Crayon's history, current operations, and goals for the future. Managers nominated the participants in this program, 80% of whom subsequently achieved leadership positions themselves.



## IN PRACTICE: Partnership with SHE Community

The SHE Community, founded in 2014, is an international community of women and girls in Science, Technology, Engineering, Art, and Mathematics. They organize a range of international programs to help raise awareness of and create solutions for the gender equality gap. The community also has a vital role in driving the changes to eliminate this inequality.

## SHE Conference

The SHE Conference is Europe’s largest gender diversity conference. Our CEO, Melissa Mulholland, sits on the board of SHE and has spoken frequently at its events over the past several years, addressing issues relating to diversity and technology.

Melissa has shared her passion for DEI in connection with responsible AI at several SHE conferences.

“It is only when you recognize that there are diversity-related issues in the models and the technology, and it is only if you recognize that there is bias, that you can reduce the risks related to them. That is why it is so critical that we all think about diversity and inclusion in the way we work today”, said Melissa.

“One way to take these issues into account is through inclusive design. This is a process that ensures creators learn from people with diverse perspectives. Using inclusive design helps filter out bias by building up diverse teams. It doesn’t necessarily produce one solution for all people; instead, the process results in a multitude of ways for people to participate.”

SHE  
Index  
ranking  
2022

Rising Star  
Award

2

Score 98/100

SHE  
Index  
ranking  
2021

28

Score 80/100



Photo: Siv Ellen Skogland

•• We are delighted with Crayon’s active participation in the SHE Community, ranking second place in the SHE Index for 2021. This recognition demonstrates the leading role the company plays in promoting gender diversity.

– Heidi Aven, Founder SHE Community

## SHE Leads

SHE Leads is a leadership training program for women in Norway, pairing senior leaders with aspirant juniors. Crayon has been an active supporter of this program, with our CEO being a mentor and several women leaders within Crayon participating as mentees.

## SHE Index

The SHE Index, launched in Norway and Sweden in 2018, encourages companies to focus on diversity and inclusion in leadership, as well as in the wider workforce. It also highlights progress toward equal compensation and a positive work-life balance. EY Norway manages the SHE Index, with Crayon as the technology partner.

## IN PRACTICE: Supporting local communities

### Germany

Donated to the Bärenherz children's hospice in Leipzig

### Norway

Donated and provided support services to the Norwegian Refugee Council

### UK

Donated screens and computers to schools for children with special needs

### US

Organized a food drive that garnered nearly 160 kilos of food for families

### India

Distributed food and medical supplies to communities disproportionately affected by Covid-19

### The Philippines

Successfully distributed 1,200 food bags during the Pandemic.

USD **111,116**

Donated to charities

**423**

Volunteers

**1,450**

Hours volunteered

#### Supporting local communities targets 2025

- Increase global volunteerism to 40% of global employee base.
- Increase funds raised by 100%.
- Increase hours of volunteerism by 50%.

## IN PRACTICE: Data management to support the Arctic

The Arctic is under increasing ecological pressure. Plastic can be found everywhere in the Svalbard area, which is harmful to marine life and the environment, degrading coastal areas and ecosystems in general. To address this issue, three sailors and ocean activists established Gate to the Arctic, an evidence-based environmental awareness initiative to create young Arctic Ambassadors.

One of the founders, Catharina Frostad, explained that they strive to generate a greater understanding of these issues by giving their young ambassadors a first-hand experience of the Arctic wilderness. Ambassadors work with scientists and experts in the field to identify the impact of human activity on the region.

"We believe in the power of data to increase the public awareness the problem and make science more reachable, especially for the younger generations. We want to motivate our ambassadors to care about the plastic in the Arctic", said Frostad.

### Bjørnøya case study

Bjørnøya, meaning Bear Island, is in the middle of the ocean, halfway between Norway's mainland and Svalbard. The island's population is mostly nesting seabirds, arctic foxes, and polar bears. The surrounding seas provide rich fishing grounds

and support many whale species. You also find the occasional scientist, along with extensive marine litter.

The Gate to the Arctic initiative organizes expeditions to the island to take samples and quantify pollution levels. To support this mission, Gate to the Arctic connected with Inmeta, a Crayon company specializing in data-driven innovation. Through a pro-bono partnership, Inmeta has provided the organization with a customized solution to gather, connect, and visualize their collected data better. This information-gathering includes the integration of weather data and access to samples of seawater, snow, and air that provide evidence of pollution in the form of microfibers and other plastic items.

"Our partnership with Inmeta, the access to their knowledge, and the solution they have developed has enabled us to use our data for good", Frostad said. "We are delighted that Inmeta Crayon provided us with such valuable support for the project".

**inmeta**  
Part of Crayon

•• Our partnership with Inmeta, the access to their knowledge, and the solution they have developed has enabled us to use the data for good.

– Catharina Frostad, Gate to the Arctic

•• At Inmeta, I help our customers to achieve strategic value by designing and developing data-driven solutions supporting their business.



### BJØRN HASSELBERG

Role: Senior consultant  
Years at Inmeta: 8  
Location: Norway

# PLANET

Managing our own environmental impact is important to help our planet. It also gives us a strong understanding of the needs of our customers and business partners.

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## Race to net zero

### Our ambition is to achieve net zero and we are taking steps to get there.

The latest climate research sends a clear signal that we must restrict the world’s temperature rise to avoid the widespread negative effects of climate change on our society.

We have a clear ambition toward net-zero and are taking steps to get there. Crayon has set an internal target of reducing GHG emissions by at least 40% by 2030. We enlisted specialized climate change consultancy Cemsys in 2021 to track our global GHG emissions in our 45 countries worldwide.

- Crayon has set an internal target to reduce GHG emissions by at least 40% by 2030

Science-Based Targets Initiative (SBTi) is the leading organization that defines and promotes best practices in emissions reduction and net zero targets inline with validated climate science. SBTi net zero targets incorporate the Paris Agreement goal of limiting the global temperature rise to 1.5°C and provide a framework to ensure that our near-term and long-term goals align with this outcome.

Crayon has committed to setting near-term companywide emission reduction targets in line with SBTi by 2024. As part of the process, we will conduct an indepth review of our emissions and include all

scope 3 categories relevant for Crayon. Through this process, we may adjust our current reduction plan, baseline year (2021), to be in line with our science-based targets commitment, for both short and long-term goals and ensure a representative dataset for our net zero journey.

For more detailed information on our global carbon reporting, please see the [Data tables](#) in the appendix.

- Crayon has also committed to setting near-term companywide emission reductions in line with climate science with SBTi.

### Race to net zero targets

2024 - Complete SBTi validation process.

2030 - Reduce GHG emissions by at least 40% (to be updated after SBTi validation process).

**7,974.6 MWh**

Consumed in 2021



**29%**

Scope 1

**3,371.7 tCO<sub>2</sub>e**

Total (market-based) emissions in 2021



**40%**

Scope 2

**1,952.1 tCO<sub>2</sub>e**

Total (location-based) emissions in 2021



**31%**

Scope 3<sup>1</sup>

<sup>1</sup> Scope 3 emissions only based on waste and travel data. For more info see [Data tables](#).

## IN PRACTICE: New headquarters in Oslo

### Our new building

Crayon’s commitment to sustainability shows in the construction of our new headquarters. The completed building achieved the BREEAM-Nor environmental mark of Excellent, which means it incorporates the latest environmental protection measures.

During construction, we placed great emphasis on circular economy principles. This approach minimized overall waste, while also providing a high degree of waste sorting. The entire building is of flexible construction, using long-lasting, robust materials. At the end of its useful life, the building’s steel and concrete structures can be dismantled, reused, and recycled.

The building’s energy supply is from Nydalen Energi, which supplies heating and cooling from predominantly renewable sources. In addition, solar cells on the roof provide electrical power, so that the entire structure achieves Energy Class A.

- We are very excited to move into our new offices in 2022 as it will help us to reach our long term climate and sustainability targets.

### Tracking emissions for our Norway office

We have tracked our CO<sub>2</sub> emissions for our existing headquarters in Norway for over a decade.

The reduction in overall emissions over the last two years relates directly to the COVID pandemic. Remote working and lower levels of business travel were the main contributors to this change. However, we are committed to embedding the benefits of new hybrid ways of working into our future operations. These benefits include fewer work-related journeys, less commuting, and increased use of remote video conferencing.



### CO<sub>2</sub> emissions for our HQ over last 5 years (tCO<sub>2</sub>)

	2021	2020	2019	2018	2017	2016
Scope 1	2.40	10.39		29.90	44.91	31.62
Scope 2	14.34	13.19	23.00	22.91	21.53	20.40
Scope 3	28.15	42.25	248.09	275.94	236.46	157.48
<b>Global emissions</b>	<b>44.89</b>	<b>65.83</b>	<b>271.09</b>	<b>328.75</b>	<b>302.90</b>	<b>209.50</b>



#### RUNE FLORDALEN

**Role:** Manager of Bid Management  
**Years at Crayon:** 15  
**Location:** Norway

●● Together with my teammates, I have been involved with Crayon’s carbon reporting for many years. Since 2011, Crayon has reported on our GHG footprint, tracking CO<sub>2</sub> emissions at our headquarters through the Eco-Lighthouse (Miljøfyrtårn) certification scheme. It’s exciting to see our new eco-friendly HQ come to life.

# Environmental management

## Our environmental policy

In 2021, we launched our Environmental Policy, which set out our commitments to environmental management and mitigating our climate impacts. This policy requires us to demonstrate responsible conduct in all our business activities. These commitments include protecting and conserving the environment, safeguarding the interests of our stakeholders from unacceptable levels of environmental risk, and supporting the principles of sustainable development.

This policy articulates multiple environmental objectives for Crayon’s operations worldwide, which are to:

- Promote environmental education.
- Manage and reduce any burden on the environment.
- Promote communication regarding a wide range of environmental topics.
- Comply with environmental laws and regulations.
- Extend sustainability and environmental efforts through voluntary commitments.

Crayon has defined targets for each of these objectives and measures its performance against these targets. Where necessary, we will revise our targets to drive further improvements. Our areas of responsibility include increasing

environmental awareness, complying with all applicable environmental laws and regulations, and implementing policies to reduce, monitor, and eliminate emissions and waste of all types. The company also commits to using energy and natural resources more efficiently, while obtaining, maintaining, and keeping current all required environmental permits.

We recognize that our operations inevitably have some environmental impact. We aim to increase the environmental awareness of our employees, suppliers, and partners; our minimum standard is to ensure compliance with all applicable environmental laws and regulations wherever the company or its subsidiaries operate.

- We will continue to reduce the environmental impact of our business and operate in an environmentally responsible manner.

Crayon commits to reducing the volume of waste generated through efficient and focused waste management practices. The company will increase reporting in this area and set future global targets for waste reduction.

- As Crayon’s global ESG manager, my responsibility is to work with our subsidiaries to help communicate, coordinate, and drive our global ESG strategy for maximum impact.

## Environmental management systems

Crayon is formalizing the adoption of the ISO 14001 standard on its Environmental Management System for all its operations worldwide. We aim to achieve this global environmental certification in 2022.

Our goal is to implement and maintain a systematic management framework to mitigate and control our environmental impacts, respond to changing conditions, and fulfill our compliance obligations.

99%

of Crayon team members have completed the 2021 environmental training<sup>1</sup>

<sup>1</sup>Remaining 1% completed in 2022

44%

of Crayon’s waste is being recycled<sup>1</sup>

<sup>1</sup>Based on estimations from UK waste management statistics. For more details see [Data tables](#).



**ANNA LITTLE**

**Role:** ESG Manager  
**Years at Crayon:** 5.5  
**Location:** UK

### Environmental management targets

- 2022 - Achieve global ISO 14001 Environmental Management System certification for 50+ entities.
- 2024 - External verification of ESG Report.





## Green IT and circular economy

### Circular economy

While the technology industry is often seen as having minimal impact on the environment, there is clearly room for improvement. We want to be at the forefront of changes to enhance the sustainability performance of our sector.

Crayon is committed to adopting circular economy principles in the way we operate. Consequently, we aim to use our raw materials and resources efficiently, reduce our energy use, deliver our products and services in a sustainable way, support eco-innovation, promote greener products, and reduce waste at the end of a product's lifecycle.

### Sustainable use of IT

Our employees at Crayon France started a pilot project where they exclusively committed to purchasing computer hardware certified with the EPEAT International Ecolabel, the gold standard for the sustainable use of all electronic equipment. They further reduced their environmental impact by partnering with Les Ateliers du Bocage, a local non-governmental organization, to repair, refurbish, or recycle any electronic material.

This initiative led to the proposal for a global Green Devices Policy, articulating our goals for the sustainable use of IT equipment within Crayon by early 2023. A key aim is that all ITC equipment has

a lifespan of at least three years. Where there is a need for more frequent equipment upgrades, we have an agreement where the supplier provides a comprehensive recycling approach, including the recovery of discarded equipment.

This approach will generate consistent processes across all our operations, covering the full device management process of procurement, logistics, delivery, support, and end of life.

- Procurement – standardizing available models on EPEAT Gold certified devices and ensuring a minimum device life cycle of three years.
- Logistics – regional logistics hubs provide order consolidation to avoid unnecessary deliveries and repair capabilities to enhance equipment lifecycles.
- Delivery – eco-friendly delivery partners providing bundled deliveries for each destination.
- Support – asset tracking and management to ensure all delivered devices are either in use, handed over to depot service for re-imaging, or released for end-of-life processing.
- End of life – refurbishment through second- and third-life extension, as well as environmentally-friendly recycling through urban scrapping.

### Efficient energy use

As a technology company, our main use of energy

is the electricity that powers our IT operations and supplies our offices. We operate 45 offices globally, and, although our footprint is relatively small, we are committed to continuous improvement.

We encourage a culture of energy consumption awareness among our teams and support environmentally conscious behavior. The recent increase in hybrid working conditions and use of videoconferencing has enabled us to reduce energy usage, particularly from lower amounts of business travel.

Crayon operates data centers in Iceland and Norway. Our data center in Iceland already runs on 100% renewable energy. The data center in Norway is leased, but we plan to move those hosted services to the public cloud by 2024.

### Top 5 Crayon Energy Consumers

Iceland <sup>1</sup>	39%
Norway <sup>1</sup>	17%
Netherlands	6%
USA	5%
UAE	4%

<sup>1</sup> Iceland and Norway's percentage is due to a large pre-commit to buy electricity for the data center.

### Green IT and circular economy targets

- 2022 – Increase awareness, adopt local initiatives, and deliver sustainable device management for laptops.
- 2023 – Incorporate new and improved policies, along with full sustainable device management and Green IT service offerings.
- 2025 – Move data centers to the cloud.



**BENJAMIN YANN**

**Role:** Software and Cloud Analytics Consultant  
**Years at Crayon:** 7.5  
**Location:** France

•• As a company, we have an important role to play in protecting the environment, so I started to investigate Green IT. I achieved a certification in Green IT, which helped me to propose new initiatives in Crayon France that Crayon subsequently adopted globally.

## IN PRACTICE: Protecting the Ocean – Tracking fish escaped from farms

Farmed fish escaping into the sea is a challenge, not just for the industry and the civil authorities, but also for the environment. Escaped fish can cause undesirable genetic effects in native populations through interbreeding and unwanted ecological effects through predation, competition, and the transfer of diseases to wild fish.

In collaboration with the civil authorities, the industry established Sporbarhet to develop and operate a national system for tracking escaped farmed fish. To identify the escapees, establish where they came from, and take targeted actions to reduce the impact of these episodes, Sporbarhet engaged Inmeta, a Crayon company, to design a data solution.

Inmeta developed a platform to collect and analyze data from farmed fish caught in the wild, enabling Sporbarhet to identify the paternity information of these animals. By analyzing this data, Sporbarhet can identify which farm was responsible and when the fish escaped.

This approach enables the authorities to identify where the problem started and address the issues directly with the company involved, requiring them to take responsibility for the negative impact on the environment from the escaped fish.

●● Inmeta had the most important role in the project, connecting all the data and developing a system that provided a good user experience. The valuable knowledge their data engineers provided is key to succeeding with a national tracking system for escaped fish.

– Helge Klungland, CEO in Sporbarhet.

**inmeta**  
Part of Crayon



**EIVIND HALMØY WOLDEN**

**Role:** Senior Consultant  
**Years at Inmeta:** 3  
**Location:** Norway

●● Working with Sporbarhet, I have had the opportunity to work with cutting edge technology to make a difference to the health of our oceans, while protecting native fish stocks and supporting the aquaculture industry.

# PROSPERITY

Crayon has always innovated on behalf of our customers by optimizing their costs. Today, this innovation becomes the lever to further our ESG work.

Products and services for ESG  
 Innovating for social impact  
 Responsible AI

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## Products and services for ESG

As Chief Technology Officer at Crayon, it is my responsibility both to oversee our customer-facing technologies and generate the strategy behind the development of these capabilities. By learning from our own experiences, I believe Crayon can become a leader in the ESG space. We can use our position as advisor and partner to many great companies as a platform to help create a more sustainable society.

- I see opportunities and natural synergies arising from ESG that we can build on and integrate into our current products and services.

Since its inception, Crayon has innovated to grow the business by providing services in these strategic areas:

- Software and licensing – optimize return on investment (ROI) on software spending
- Cloud services – accelerate the adoption of cloud to maximize business value. These services include key practice areas, such as:
  - Cybersecurity – protecting customers’ and company data
  - FinOps – using financial data to maximize business value
  - Modern work – making hybrid working a great experience
- Data and AI – unlocking the business value of data

I support the foundation we have created within our own ESG strategy. Because we now understand the challenges and opportunities, we can support our customers as they also develop and deliver their ESG commitments.

### Enhancing existing synergies

Some of our existing services, such as data and AI, naturally reinforce our customers on their ESG journeys. In this report, you will find several examples where data, ML, and AI helped our partners and customers achieve their ESG goals. Cybersecurity is increasingly a social and governance concern, as cyberattacks increase in frequency and severity, leading to disruption of both financial and business operations.

### Viewing the future

Crayon’s original DNA centers around the theme of IT cost optimization through cloud, software, and licensing. Since the company was founded, our customers have trusted us to optimize ROI from their IT expenditure. Today, many of our customers are at a point where, despite spiking inflation, cost is not the only dimension to optimize. Sustainability has rapidly emerged as a key factor governing the use of IT assets. For example, the CO<sub>2</sub> footprint of existing IT assets is a serious concern, especially with impending regulations, such as carbon taxation. As an industry, we need to work together to reduce our CO<sub>2</sub> usage. This is where we can differentiate ourselves through a

natural extension of our Software Asset Management (SAM) practice, an area where we are named a Leader in the Gartner Magic Quadrant™.

This greater focus on sustainability will inevitably lead to an increased migration of workloads to public cloud environments, as economies of scale typically make shared installations more environmentally friendly than private data centers.

However, the journey does not end here. In five or more years from now, we want to be a leader in helping our customers run their IT workloads in the most sustainable way possible on any cloud. To achieve this outcome, Crayon is investing in new products and services using our intellectual property to ensure our customers and partners benefit from this improvement.

Our continuing innovation will result in the creation of a line of sustainability products and services over the next few years. A great example is our sustainable FinOps service that empowers our customers to analyze complex cloud usage data. From this information, they can discover actionable insights that reduce costs and, increasingly, promote environmental accountability. Our customers automatically receive suggestions for actions to take to improve their cloud ROI, such as reducing monthly spending and increasing the speed of their service. Similar insights enable them to reduce the carbon footprint of their cloud presence, through activities such as rightsizing and relocation.

This is an exciting process for us. We are committed to becoming a leader in this space and working on those topics in close collaboration with our customers and partners.



- It is critical we think strategically about environmental and social challenges. We will continue to find innovative solutions for our customers in the transition to a greener, more equitable, and more inclusive future.

– Florian Rosenberg, CTO

### Product and services for ESG targets

- 2023 – Market entry with sustainability products and services.
- 2025 – Leader in Sustainable FinOps.
- 2027 – Leader in ESG Product and services.

## Innovating for social impact

Since Crayon’s founding, we have adapted and innovated to best serve our customers’ needs. This approach has always been and will continue to be a key part of our success.

As we look ahead to the next 20 years, we recognize that the speed of development and innovation will continue to accelerate. To remain relevant to our global client base and stay ahead in our field, we must constantly evolve our pioneering culture to support our future growth and the development of ESG products and services.

### Our commitments to ESG innovation

- Foundation of the Crayon ESG Innovation Fund that uses our technology and services to support the local communities in helping to deliver environmental conservation and social good.
- Oversight of data-driven ESG metrics in aspects as diverse as carbon monitoring and workplace diversity.
- Integration of environmental sustainability into our IT cost optimization modeling, enabling our customers to better understand their environmental footprint, as the first step toward their own ESG initiatives and strategy.
- Development of AI that is ethical by design, involving continual scrutiny of the services we provide and our partner organizations.

- Adoption of privacy and security as core principles in all our work. Our diligence on privacy and sensitive data protection must exceed the expectations of our customers and partners.
- Creation of a portfolio of innovative products and services that respond to our customers’ needs around sustainability across our service pillars and professional services, with robust platforms and focused products.

We anticipate that the sustainable innovator profile we are building supports our capacity to remain a market leader, keep abreast of regulations, further reduce cost and energy consumption, and maintain high user satisfaction.



### AJANTHINI PERUMAL

**Role:** Global Service Management Director  
**Years at Crayon:** 2  
**Location:** Norway

•• At Crayon, I drive the quality and service management practice on a global level, ensuring compliance with corporate policies and industry standards across all products and services for our customers and partners.



### Innovating for social impact targets

- 2023 - Innovation lab with customers, start-ups and universities.
- 2024 - Sustainability and privacy by design for our portfolio of products and services.
- 2025 - ESG Innovation funded projects deliver significant market success.

# The Crayon ESG innovation fund

In 2021, Crayon launched an internal ESG Innovation Fund of 1 million NOK to encourage ESG-related innovation from Crayon employees. The objective of this fund is to foster creative thinking on solutions to the issues that are closest to our employees' hearts. We encourage employees to suggest ideas through a company-wide portal. A jury consisting of several Crayon team members across all divisions then discusses and rates these ideas, with successful projects receiving financial support.

## IN PRACTICE: Preventing deforestation in Vietnam

The first funded project was a pilot project with the environmental conservation NGO Fauna & Flora International to help monitor forest degradation from illegal cardamom cultivation in Vietnam. Forest degradation is often discovered too late and only in easily accessible areas. Monitoring remote areas with fragile ecosystems and measuring the true extent of the state of forest degradation is difficult. Consequently, plant life destruction has often gone too far before the issue becomes apparent.

Our company volunteers knew that the current control mechanisms to discover, monitor, and prevent forest degradation were highly inefficient; what this challenge needed was an innovative

approach. The goal of the project is to demonstrate how machine learning could integrate with remote sensing technology to periodically analyze satellite images and identify suspicious changes to the forest canopy. This approach aims to provide the NGO with the ability to discover areas of potentially harmful degradation while providing a platform that can scale to support their conservation activities globally.

"We are really excited by the potential of this pilot project in two reserves in Vietnam, which are critical for the conservation of the black crested gibbon (*Nomascus concolor*) and other endangered species. Applying artificial intelligence to the mapping of forest degradation has never been done in Vietnam before, and we hope that through this project we can help our government partners to better understand, monitor, and respond to threats in their nature reserves." says Dr. Oliver Wearn, Technical Advisor for FFI in Vietnam.



12

Submissions

2

Selected<sup>1</sup>

1 MNOK

Fund



### HILDA KOSORUS

**Role:** Director, Data and AI CoE Vienna  
**Years at Crayon:** 2.5  
**Location:** Austria

•• For me, leading the ESG Innovation Fund within Crayon has been a truly fulfilling and exciting opportunity to connect with and work alongside many dedicated and committed colleagues across the globe. It has been exciting to see how engaged and creative we can be when we work on things that matter to us - toward a more sustainable world tomorrow.

<sup>1</sup> In 2021, another project submitted through the ESG fund was related to our products and services for ESG, which is under development. Given the size of the investment into this project, it was taken out of the innovation fund and incorporated directly into our product development process.

# Responsible AI

Artificial Intelligence (AI) brings unprecedented opportunities to businesses, along with significant responsibilities. AI's direct impact on people's lives has raised questions about ethics, data governance, trust, and legality. As organizations start scaling up their use of AI, they need to be aware of the potential risks around this technology's design, development, and deployment.

AI solutions can be invaluable tools for efficient decision-making. However, in recent years, there have been numerous examples where such systems have leaked sensitive information, amplified existing social discrimination, and resulted in damage to human lives. These events have increased public distrust in the companies involved and in AI as a field. When using AI for decision-making, it is imperative to design and implement solutions that incorporate responsible use of this technology.

## Crayon's Center of Excellence

Crayon's Center of Excellence for Data and Artificial Intelligence Services (Data and AI CoE) is a global practice serving the growing demands of data-driven businesses worldwide. We aim to be at the forefront of the ongoing AI revolution and are committed to the ethical use of AI in line with our core values.

CRAIG (Crayon Responsible AI Guidelines) is our

reference framework for the responsible development of AI within the company, ensuring that our services remain grounded in sustainability, ethics, trust, robust engineering, and security. CRAIG establishes mechanisms for us to be a genuinely responsible AI organization, including an in-depth policy, integration into sales and delivery processes, structures for support and governance, and knowledge dissemination.

In numbers:

- Our policy contains 50 specific guidelines across seven dimensions of responsible AI: individual responsibility, appropriateness, fairness and equity, transparency and interpretability, inclusiveness and human centricity, stakeholder interaction and communication, along with technology and engineering.
- Our sales, pre-sales, and delivery processes include four self-assessment checklists to verify that our responsible AI principles are followed.
- Our responsible AI structure consists of two bodies: a governance body to drive strategy, align priorities, and ensure training, and an executive body to supervise, provide support, and act as an escalation point.
- Over 170 people whose core role is to sell or deliver data and AI services have completed mandatory training on the policy's guidelines, data processing principles, and governance.

•• I drive our Responsible AI strategy to ensure a robust, ethical, and trusted AI practice internally and with our customers through solid governance, sales and delivery processes, and the necessary training and support channels.



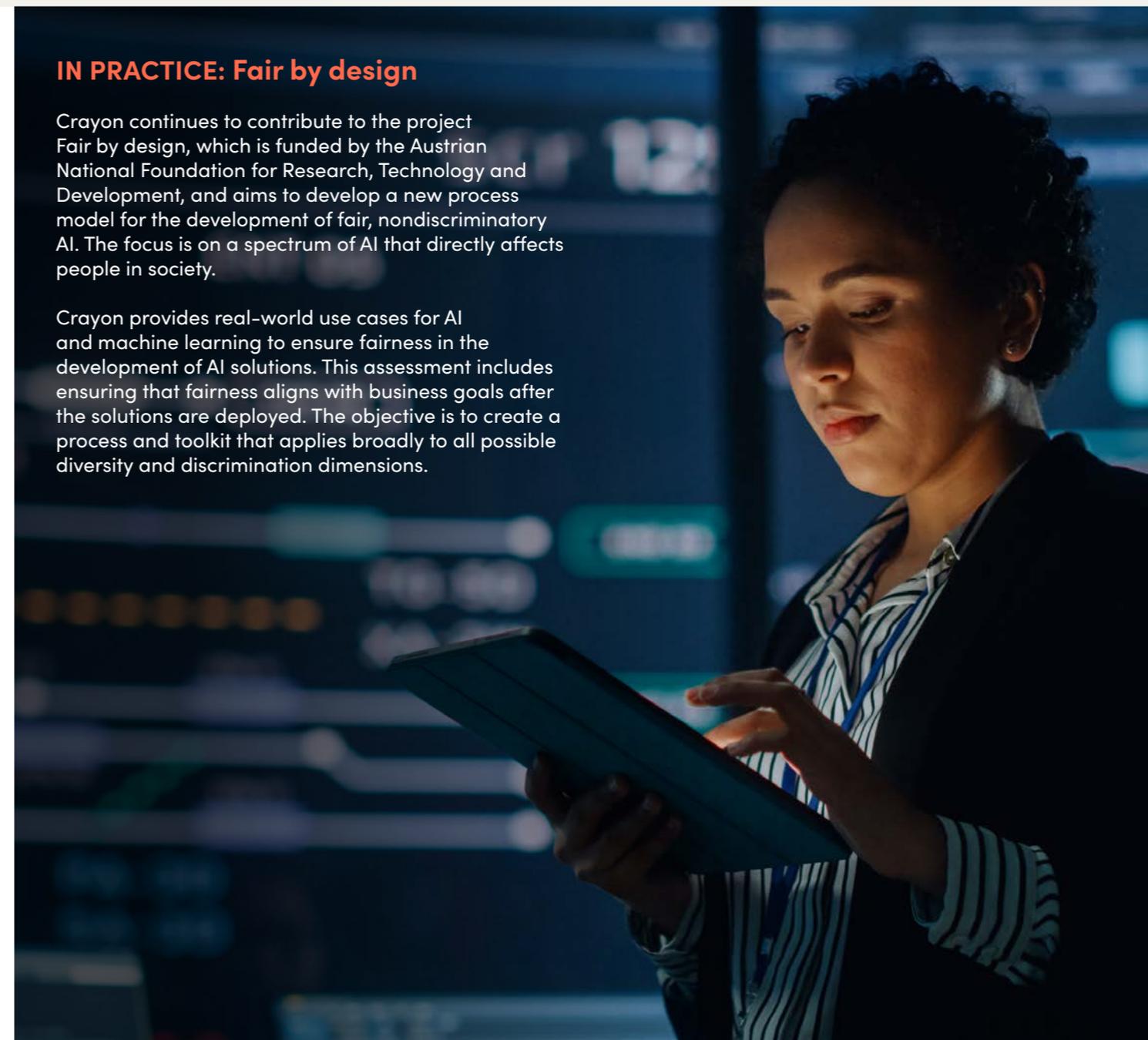
**DAVID MOSEN**

**Role:** Chief Data Scientist  
**Years at Crayon:** 2.5  
**Location:** Spain

## IN PRACTICE: Fair by design

Crayon continues to contribute to the project Fair by design, which is funded by the Austrian National Foundation for Research, Technology and Development, and aims to develop a new process model for the development of fair, nondiscriminatory AI. The focus is on a spectrum of AI that directly affects people in society.

Crayon provides real-world use cases for AI and machine learning to ensure fairness in the development of AI solutions. This assessment includes ensuring that fairness aligns with business goals after the solutions are deployed. The objective is to create a process and toolkit that applies broadly to all possible diversity and discrimination dimensions.



### Responsible AI targets

- 2022** - Responsible AI awareness incorporated into Crayon's ethical and sustainable culture.
- 2023** - Responsible AI becomes a pillar of Crayon's data and AI best practices and offering.
- 2024** - Prospective customers proactively reach out to Crayon for its responsible AI expertise.

## IN PRACTICE: Improving HSE at Downer Group

Downer Group builds and sustains assets, infrastructure, and facilities across Australia and New Zealand. The organization employs 44,000 people across more than 300 sites. Safety is Downer’s main priority, and Zero Harm – managing HSE and community risks – is embedded in the company’s culture.

Understanding risks, managing those risks, and learning from incidents play a fundamental role in Downer’s Zero Harm goal. This approach involves deriving insight from the data collected about HSE activities and incidents. Downer’s critical risk management program generated an in-depth analysis of 320 material risks, from which the company documented 16,000 risk controls.

Downer asked Crayon to help them manage these analyses and start streamlining and optimizing processes across the Group. The sheer volume of control information and management system documentation made this task challenging.

Crayon enabled Downer to use natural language processing (NLP) – a branch of AI that uses software to comprehend human text or speech – to tag all the safety reports and documents. A machine learning model then gathered insights from the data pool, with an application programming interface making these insights accessible to the users.

The solution, developed on the Microsoft Machine Learning Studio platform (now Azure Machine Learning), enabled Downer to develop a range of tools in-house to transform the way they managed their HSE. In the future, Downer’s employees may be able to talk to an app to receive accurate and relevant best practices for managing risk associated with the task they are about to do, all thanks to an artificial intelligence-infused safety management platform.

●● **The NPL tool has significantly improved our ability to process large volumes of information and greatly improve our HSE performance.**

– Downer Group



**DAVID BERGENDAHL**

**Role:** Regional Commercial Director – Data and AI  
**Years at Crayon:** 2  
**Location:** Singapore

●● It has been an absolute pleasure to bring this solution from idea to reality together with the team at Downer, and we are very excited to develop it further to support their admirable Zero Harm goal.



# GOVERNANCE

Crayon's strong governance structure gives employees, customers, and business partners confidence that we will always lead with integrity.

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## Integrity, risk, and compliance

Crayon considers good corporate governance a prerequisite for value creation and trustworthiness. To secure sustainable corporate governance, we must ensure all our subsidiaries have healthy business practices, reliable financial reporting, and an environment of compliance with legislation and regulations.

In 2021, we increased our investment in integrity, risk, and compliance by hiring a global compliance team and launching our global Integrity Policy. This approach was further strengthened when the mandate of the Audit committee expanded to become the Audit and Risk committee, thus ensuring that Enterprise Risk Management and Compliance were represented at the board level.

### Enterprise risk management

We established an Enterprise Risk Management function to create an overview of the most significant risks to Crayon's sustainable growth. The purpose of this global approach is to implement a management system that identifies potential risks which might affect the company. The secondary outcome is to manage those risks to match Crayon's risk profile. This risk profile reflects our values, mission, and vision, considers the expectations of stakeholders, and controls the influence the company has on the environment, culture, and society.

Crayon's Enterprise Risk Framework encompasses practices relating to the identification, analysis, evaluation, treatment, mitigation, and monitoring of the strategic, operational, legal, and compliance risks inherent in achieving our key business objectives.

Risk management integrates into our business processes to enable us to achieve our strategic and operational objectives. This approach promotes growth and addresses potential risks proactively while enabling employees to carry out their primary functions.

The Integrity, Risk, and Compliance team manages the central Global Risk Register and regularly discusses any high-risk issues with the executive management team. The Chief ESG and Integrity Officer (who reports directly to the Chairman of the board) participates in this process and any material issues then go before the Risk and Audit committee. In addition, the Chief ESG and Integrity Officer has regular meetings with the Audit Committee Chairman to discuss any emerging risks.

### Climate risks

We understand the importance of prioritizing our understanding of climate risks and mitigating them. Our Global Environmental policy requires us to manage climate change risks and develop, implement,

and maintain standards and procedures to review, assess, and manage the environmental risks inherent in digital transformation and operational activities.

- Our governance structure, through the existing Risk Function, enables us to capture and manage climate-related risks effectively.

The central ESG team is responsible for identifying and managing climate-related risks with the support of local stakeholders in the subsidiaries. The ESG committee has accountability and oversight for ensuring the company's management is reviewing, assessing and mitigating climate-related risks and opportunities. Any material ESG risks are also presented to the Audit and Risk committee, as well as the Board, as part of the Enterprise Risk Management Review.

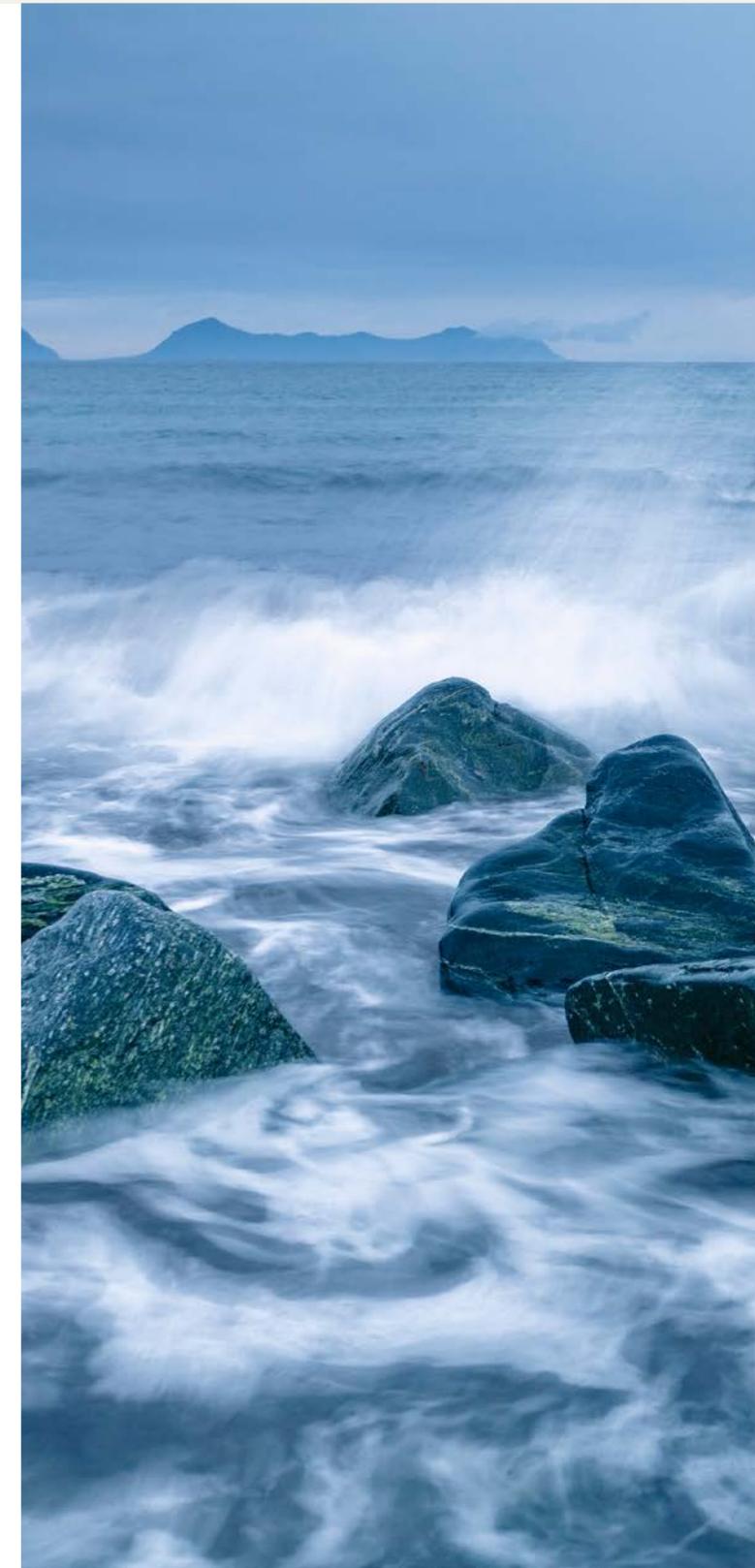
Crayon identifies climate risks related to the IT and services industry within its Task Force on Climate-related Financial Disclosures (TCFD) review process and uses that framework as the basis of its climate risk mitigation efforts. Currently, Crayon is still working on a full scope 3 GHG emission report for our verified science-based target initiative process. After completing this process, Crayon can then complete the TCFD assessment process more fully. See the [TCFD data table](#) in the appendix for more information.



#### TINA VERMA

**Role:** Global Risk and Compliance Director  
**Years at Crayon:** 6 months  
**Location:** UAE

- At Crayon, I lead measures to ensure adherence to internal guidelines and legal regulations relating to integrity, risk, and compliance. Our individual and collective commitments guide us to act lawfully and ethically.



## Business ethics and integrity

Integrity is at the core of how we operate as a business – in our approach to our customers, business partners, suppliers, team members, shareholders, and broader stakeholders. It is central to our business strategy and strengthens our competitive advantage. Very simply, we believe that it is the right thing to do.

One of the main responsibilities of the Global Risk and Compliance team is to ensure that Crayon maintains the highest standards of integrity within the organization. The Global Risk and Compliance team has made it clear that their remit is **“to be the independent and trusted advisor to the business by helping to minimize risks and maximize Crayon’s competitive advantage.”**

The Global Risk and Compliance team’s mission is to:

- Protect the company and Crayon brand to enhance business growth.
- Enable employees to embody a culture of compliance that is consistent with our vision and core values of Integrity, Quality, Pace, and Agility.
- Support the business proactively in understanding and managing the current and emerging risk landscape.
- Position Crayon as a leading ethical company within our industry and to our key business partners through an effective risk and compliance program.

Our Global Integrity Policy sets ethical conduct, anti-corruption, and legal compliance standards. The Integrity Policy applies to all Crayon team members, which means Crayon’s board of directors

and all employees, consultants, contractors, directors, executive officers, and affiliates in which we own more than 50% of the voting controls.

- • We are committed to running our business responsibly and in adherence to the highest ethical principles.

We require the highest ethical standards in every part of our business, including our advertising, marketing, and public relations material. Crayon has an imperative of honesty to its customers and the public.

### Integrity hotline

Crayon promotes a ‘speak-up’ culture and has established several channels, including an external whistleblowing system operated by PWC that allows for anonymous reporting. We encourage employees to raise breaches of the Integrity Policy through that system. It is important to us that raising a concern is as easy as possible while adhering to the latest regulatory requirements.

We offer a variety of confidential ways to report concerns. These options include our integrity@crayon.com email address and a telephone hotline at +47 23 96 84 00. Crayon also has a strict non-retaliation policy. In 2021, there were eight escalations through the Integrity hotline, to the email address, or directly to executives or the Global Compliance team. All cases were investigated and closed.



**RICARDO NARCISO**

**Role:** Senior Global Compliance Manager  
**Years at Crayon:** 1  
**Location:** Portugal

•• People often forget about the G in ESG, which stands for governance. As part of the Integrity, Risk, and Compliance team, I support the company through daily management of ESG, involving processes, policies, rules, regulations, laws, and ethical standards that deliver effective governance.

## Anti-bribery and corruption

Crayon is committed to enforcing compliance with anti-bribery and corruption laws in all parts of our business. We have a zero-tolerance approach to corruption and bribery. We expect all our employees to observe our ethics and compliance policies, along with any third parties acting on behalf of Crayon or seeking to conduct business with Crayon.

All Crayon employees, including our board members, must complete annual compliance training. In addition, Crayon is completing ISO 37001 Anti-bribery and Corruption certification for all our operations. With this standard in place, we expect to consolidate awareness across the organization, formalize leadership commitment, and standardize anti-bribery and corruption best practices and processes globally.



- Middle East and Africa (37.5%)
- Western Europe (25%)
- Asia-Pacific (12.5%)
- Central and Eastern Europe (12.5%)
- United States (12.5%)

**100%**  
 Investigated and closed

<b>Board Members</b>	<b>100%</b>
<b>Executive Management Team</b>	<b>100%</b>

Received additional in-person anti-bribery and corruption training in 2021

<b>Employees</b>	<b>99%<sup>1</sup></b>
<b>Board Members</b>	<b>100%</b>

Completed our 2021 global integrity policy E-learning training

<sup>1</sup> Remaining 1% completed in 2022

**Integrity, risk and compliance targets**  
 2022 - Global ISO 37001 Anti-Bribery and Corruption certification for 50+ entities.  
 2023 - Use SBTi process to support a fuller TCFD review.

# Third-party management

Our global value chain is an integral part of our business. It provides us with the products, services, and support we need to deliver effectively to our customers. Seamless integration with our suppliers and partners is crucial to running our business. However, this close relationship also brings responsibilities, such as a shared concern for the environmental impact of our supply chain and potential integrity and compliance risks if these factors are not managed appropriately.

- We expect our business partners to uphold the same levels of integrity and transparency and build the same level of trust across the world.

In 2021, we set an Integrity Policy for our partners that applies to employees of all the partner organizations that we work with. This policy applies to individuals or organizations that are an integral part of our service delivery ecosystem or act in a representative capacity. These entities include agents, vendors, financial advisors, brokers, joint venture partners, resellers, distributors, and lawyers. We want organizations with whom we trade to share our commitment to avoiding pollution, minimizing emissions, and cutting waste by also developing and implementing environmentally friendly technologies and processes.

Given our complex global operations, we need to manage the environmental and social impacts of our value chain. Our Board of Directors and executive management team have committed to a detailed review of our business partners and to investing in a centralized and robust third-party risk management system to ensure our suppliers understand their responsibilities concerning:

- Integrity, ethics, and compliance
- Anti-bribery, corruption, and fraud
- Security and privacy
- Accurate credit and financial reporting
- Environmental, social, and governance issues
- Diversity, equity, and inclusion
- Human rights, child labor, and working conditions

We are committed to thoroughly evaluating our supply chain, and creating suitable metrics and targets when assessing and onboarding our suppliers. We want to use this information to address potential issues in an open dialogue with our business partners. We also plan to develop a supplier diversity program that promotes, develops, and encourages women- and minority-owned businesses while maintaining best-in-class supply chain practices.



**OLGA DEMENTYEVA**

**Role:** Senior Global Compliance Manager  
**Years at Crayon:** 8 months  
**Location:** Kazakhstan

- We can only be as ethical or sustainable as the business partners and customers we work with. We therefore need to manage our value chain with integrity.

### Third party management

- 2023** - Implementation of centralized third-party risk management process and tools.
- 2024** - Capture data related to supply chain action for further reporting and target-setting
- Pilot supplier diversity programs in select markets.
- 2025** - Create a global partner dialogue process through information and data gained.

## Data privacy and cybersecurity

Whenever our customers select Crayon to guide them on their IT journey, they trust us to process confidential business and personal data on their behalf. To protect this information, we have implemented a robust security and privacy framework that ensures our services remain grounded in the principles of security by default and privacy by design.

We are proud that the quality of our security and privacy framework was externally validated when we achieved global certification for both our Information Security Management System (ISO 27001:2013) and our Privacy Information Management System (ISO 27701:2019).

### Enabling privacy rights

Our commitment to protecting the privacy rights of individuals whose personal data we process is cemented in our horizontal approach to the implementation of privacy by design. In addition, every single Crayon team member knows that our success in data protection depends on the attention they apply, both when processing personal data and when enabling individuals to exercise their privacy rights. Any Data Subject Access Requests that the company receives go directly to Crayon’s Information Security and Data Protection team, where they receive an immediate response.

### Preventing data breaches

We continuously invest in state-of-the-art technology to ensure our security posture remains resilient in today’s ever-evolving cyber threat landscape. Because of our strong security and privacy culture, Crayon’s Security Unit also receives proactive reports related to security and privacy events from Crayon team members worldwide. These reports provide critical information that helps to optimize our technical and organizational responses to attempted cyber-attacks. This combination of timely reporting and constant security monitoring has prevented the company from experiencing a data breach.

### Responding to threats

Crayon’s Security Unit takes considerable pride in completing threat detection, assessment, and resolution cycles as rapidly as possible. Our response to the Log4j vulnerability exemplifies our rapid-reaction approach. The Information Security and Data Protection Unit first detected this zero-day threat through open-source scanning on Friday, 10th December 2021. As a result of the team’s commitment and operational capabilities, Crayon’s Security Unit provided our global customer base with a briefing on Crayon’s mitigating actions and customer recommendations just three days later.



100%

on all Crayon Board Members have completed Information Security and Privacy Training

### Data privacy and cybersecurity

- 2023
- Ensure our security and privacy framework supports Crayon’s ambitious growth
  - Deepen collaboration with Crayon’s Cybersecurity Services Unit to benefit Crayon and its customers
  - Recertification of Global ISO 27001 Information Security and ISO 27701 Privacy Information Security Management for 50+ entities



**SCOTT RICHARDSON**

**Role:** Chief Security Officer  
**Years at Crayon:** 5.5  
**Location:** Finland

•• Our Security Unit delivers on Crayon’s commitment to protect privacy rights and confidential data by implementing state-of-the-art technological and organizational measures. These measures harden our security and privacy posture, providing for long-term resilience within our constantly evolving risk landscape.

## IN PRACTICE: Supporting Healthcare Regulations at TJC

US Healthcare was a \$4.1 trillion industry in 2020, accounting for 20% of the national budget, a number that dramatically increases every year. High-quality and efficient medical treatment is essential for the US population.

The Joint Commission (TJC) is a global driver of quality improvement and patient safety in health care. TJC regularly certifies and inspects US hospitals to ensure they meet strict quality and safety standards. All US health institutions need certification as 'fit for operation', confirming that they are operating as safely as possible for both patients and employees. TJC is one of the few organizations that can issue such certifications, ensuring their validity through regular inspections.

These inspections cover a wide range of public standards, regulations, requirements, and procedures. Navigating these complex health and safety considerations is a challenging task for hospital inspectors, who must be aware of thousands of regulations that change every six months.

The TJC AI solution, developed by Crayon and using Microsoft technology, supports hospital inspectors by automatically finding relevant regulations, according to observations made during hospital visits. With around 2,000 inspectors reporting tens of thousands

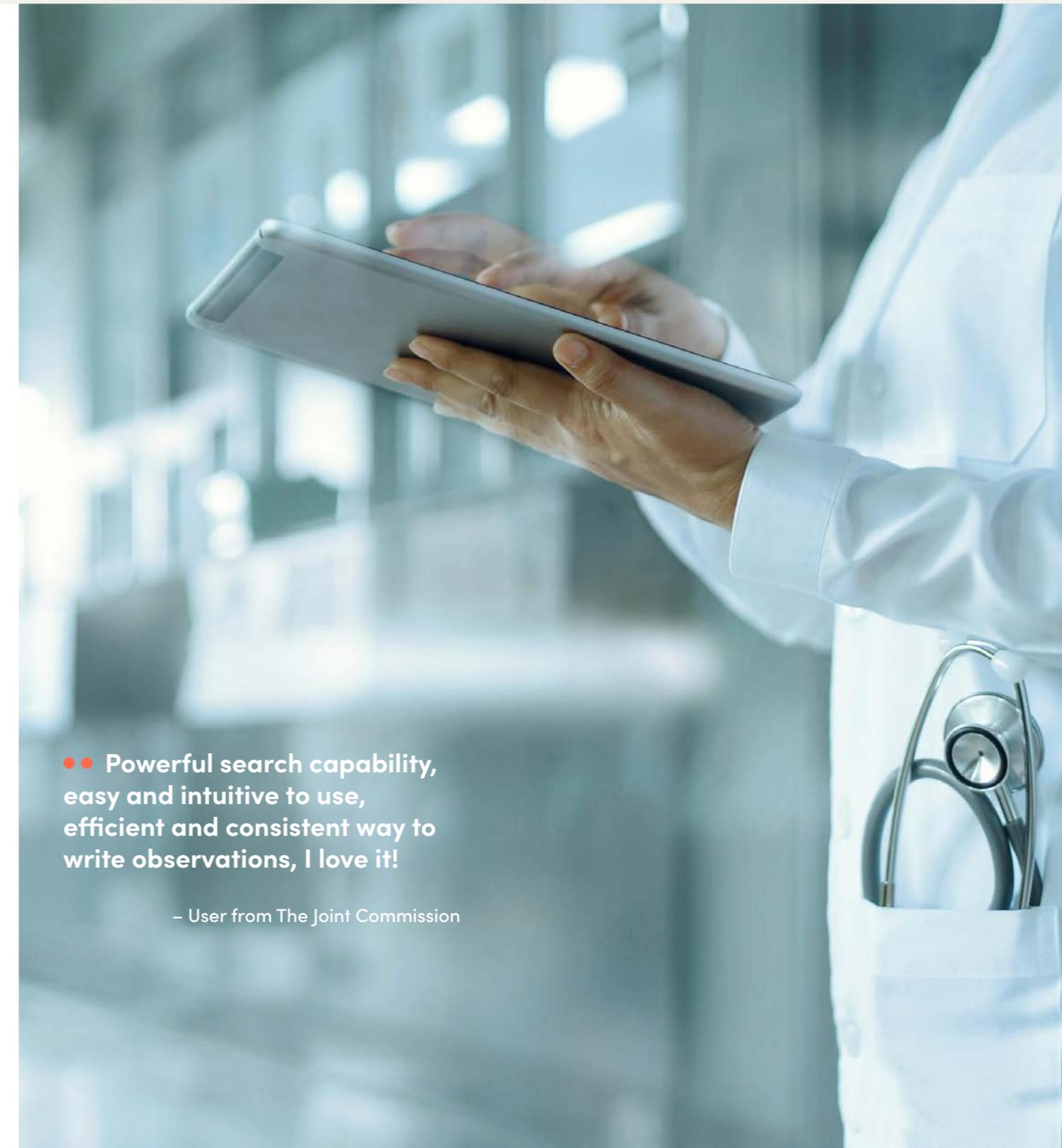
of observations annually, automatically identifying regulations greatly improves their efficiency. This technology also increases the quality and accuracy of their reports, which – importantly – results in safer and more efficient hospitals.



### JASON SKINNER

**Role:** US Director, Data and AI  
**Years at Crayon:** 4  
**Location:** United States

•• The most exciting moment in innovation is when vision becomes reality, and a challenge is solved. Crayon's partnership with the brilliant team at TJC has allowed us to experience that moment together, with the additional reward of a positive societal impact



•• Powerful search capability, easy and intuitive to use, efficient and consistent way to write observations, I love it!

– User from The Joint Commission

# CONCLUSION

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## The next 20 years

**Crayon is committed to supporting the green energy transition and to creating a more equitable society.**

As both a board member and Chair of the ESG Committee, I am dedicated to the growth journey that the company will undertake in the foreseeable future. I also know that Crayon is ready to be a leader in this area.

This report has shown Crayon's impressive trajectory so far. It starts with adopting a powerful stance on diversity, equity, and inclusion, moves on to demonstrate how Crayon wholeheartedly embraces taking all possible actions toward net zero, and finishes with contributions from our team of amazing people who want to be part of the solution, delivering innovation and services that help customers meet their ESG targets.

Let me recap on some of the most important commitments we wanted to share with you.

### People

Diversity, equity, and inclusion are extremely important at Crayon. Half of our board of directors are women, as are three out of seven of our executive management team. We have set a further target that women should make up 40% of all employees across the entire company by 2027.

But we won't stop there. Diversity is about more than gender. Crayon wants to represent the full diversity of the population within the countries in which we operate. We want to create a workplace where inclusion and collaboration are key. These are our

fundamental beliefs and central to how our company works.

### Planet

The latest climate research sends a clear signal that we must avoid the widespread negative effects of climate change on our society. We have a clear ambition toward net zero and are taking steps to get there. We enlisted specialized climate change consultancy Cemsys to support our 2021 global carbon reporting in our offices around the world, tracking our global CO<sub>2</sub> emissions.

Crayon is committed to fulfilling its role in achieving a low-carbon economy, with a target to reduce carbon emissions by at least 40% by 2030. In addition, we have committed to setting near-term companywide emission reductions in line with climate science with the Science-Based Targets Initiative (SBTi) by 2024. By neutralizing any residual emissions through carbon offsetting projects, we aim to achieve net zero before 2050.

### Prosperity

As an innovative technology company, we want to be a facilitator that helps our customers achieve their sustainability goals through the development and adoption of modern technologies. We are creating a line of innovative ESG products and services and want to be a recognized leader in this area by 2027. As you read through the 'In Practice' examples in this report, you can see how we already support ESG initiatives through our data and AI services.

We also see an opportunity for our cloud adoption and acceleration services to be a major driver in reducing carbon emissions at our customers' businesses. A great example is our sustainable FinOps service that

enables our customers to analyze complex cloud usage data. From this information, they can discover actionable insights that reduce costs and, increasingly, promote environmental accountability. We want to be the recognized leader in sustainable FinOps by 2025.

### Governance

We have established a strong governance culture within Crayon because we are convinced that an uncompromising approach toward good governance is the best way to demonstrate to employees, customers, and our wider stakeholders that we are a trusted partner that operates transparently and ethically.

Crayon is a company that believes in the power of technology to drive the greater good. As we accelerate our ESG initiatives around the world, I am excited about the amazing impact we can have on society as a whole, and I am proud to be a part of this unique organization. I hugely appreciate the efforts of everyone who helped create this report and define our ESG strategy, and I look forward to working with you all to bring it to fruition.



●● **As we accelerate our ESG initiatives around the world, I am excited about the impact we will have on society, and I am proud to be associated with the company.**

– Jennifer Koss  
Board Chairwoman of  
the ESG Committee

# Ambitions summarized

## People

### 1 Employee well-being

- 2023 - Increase the annual Employee Feedback survey score by 0.5 percentage points (from 4.2 to 4.75 out of 5) and increase the overall global participation rate from 61% to 85%.
  - Give employees a comprehensive overview of internal career and development paths.
- 2024 - Launch enhanced management and talent-related training programs for all employees.
  - Align global policies and benefits across the organization.

### 2 Diversity, equity and inclusion

- 2022 - 100% completion of unconscious bias training
  - External accreditation by an independent DEI certification body.
- 2024 - Start measurement and establish global voluntary reporting of diversity metrics expanded from gender in 2022, in accordance with local legislation.
  - Using the baseline established, set further ambitious diversity targets based on voluntary reporting.
  - Grow or maintain SHE Index at 98/100.

### 3 Supporting local communities

- 2025 - Increase global volunteerism to 40% of global employee base.
  - Increase funds raised by 100%.
  - Increase hours of volunteerism by 50%.

## Planet

### 4 Race to net zero

- 2024 - Complete SBTi validation process.
- 2030 - Reduce GHG emissions by at least 40% (to be updated after SBTi validation process).

### 5 Environmental management

- 2022 - Achieve global ISO 14001 Environmental Management System certification for 50+ entities.
- 2024 - External verification of ESG Report.

### 6 Green IT and circular economy

- 2022 - Increase awareness, adopt local initiatives, and deliver sustainable device management for laptops.
- 2023 - Incorporate new and improved policies, along with full sustainable device management and Green IT service offerings.
- 2025 - Move data centers to the cloud.

## Prosperity

### 7 Products and services for ESG

- 2023 - Market entry with sustainability products and services.
- 2025 - Leader in Sustainable FinOps.
- 2027 - Leader in ESG Product and services.

### 8 Innovating for social impact

- 2023 - Innovation lab with customers, start-ups and universities.
- 2024 - Sustainability and privacy by design for our portfolio of products and services.
- 2025 - ESG Innovation funded projects deliver significant market success.

### 9 Responsible AI

- 2022 - Responsible AI awareness incorporated into Crayon's ethical and sustainable culture.
- 2023 - Responsible AI becomes a pillar of Crayon's data and AI best practices and offering.
- 2024 - Prospective customers proactively reach out to Crayon for its responsible AI expertise.

## Governance

### 10 Integrity, risk and compliance

- 2022 - Global ISO 37001 Anti-Bribery and Corruption certification for 50+ entities.
- 2023 - Use SBTi process to support a fuller TCFD review.

### 11 Third-party management

- 2023 - Implementation of centralized third-party risk management process and tools.
- 2024 - Capture data related to supply chain action for further reporting and target-setting
  - Pilot supplier diversity programs in select markets.
- 2025 - Create a global partner dialogue process through information and data gained.

### 12 Data privacy and cybersecurity

- 2023 - Ensure our security and privacy framework supports Crayon's ambitious growth.
  - Deepen collaboration with Crayon's Cybersecurity Services Unit to benefit Crayon and its customers.
  - Recertification of Global ISO 27001 Information Security and ISO 27701 Privacy Information Security Management for 50+ entities.

# Thank you

We want to thank the Team Members who supported the development of our ESG strategy in various capacities. Thank you for being an integral member of the Crayon Family.

Melanie Coffee (Norway)  
 Dorothea Thomas (US)  
 Paul Clements (UK)  
 Betsy Barnhouse (US)  
 Annalisa Cadonna (Austria)  
 Peter Tham (Norway)  
 Brit Smestad (Norway)  
 Sara El Halabi (UAE)  
 Laura Buchmeier (Germany)  
 Faye White (UK)  
 Sara El Halabi (UAE)  
 Owen Vilorio (Singapore)  
 Abdullah Masud (US)

Nina Janorschke (Germany)  
 Olha Shkolna (Ukraine)  
 Elissa VanHorn (US)  
 Chalrlotte Molde (Norway)  
 Gail Grubb (India)  
 Hezron Sedaria (Philippines)  
 Katerina Mikulecka (Czech Rep)  
 Aria Soltani (Sweden)  
 Christie Torkildsen (Norway)  
 Ramanarayan (India)  
 Jaqueline Santos Goncalves (Germany)  
 Katarzyna Mroz (Norway)  
 Knut Anders Gjersøe (Inmeta)

Anna Little (UK)  
 Kyle Mulholland (Norway)  
 Helga Dögg Björgvinsdóttir (Iceland)  
 Shaun Tan (Singapore)  
 Tora Deglium (Norway)  
 Mary Beula (India)  
 Julia Akhmadullina (Russia)  
 Benjamin Yann (France)  
 Mohammed Mousa (UAE)  
 Werner Wilders (South Africa)  
 Alexandra Micheelsen (Germany)  
 Sita Pun (India)  
 Taleb Zaher (UAE)

Gudmundur Gudnason (Iceland)  
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 Hilde Kosorus (Austria)  
 Einar Larusson (Iceland)  
 Bianca Welgraaf (UK)  
 Øyvind Hetland (Inmeta)  
 Alexandru Rogojina (Romania)  
 Miska Braun (Finland)  
 Ellinor Marie Askildsen (Inmeta)



In addition we would like to thank our global finance colleagues who supported with our global carbon reporting.



**SARA EL HALABI**

**Role:** MEA Operations Manager  
**Years at Crayon:** 2  
**Location:** UAE

•• I am passionate about ESG so I took the first opportunity to volunteer to enhance employee engagement and foster teamwork and community support. Our goal was to become mindful about small things that can impact society and benefit our colleagues. Our efforts were geared towards positive changes that make small differences in people’s lives.



**ARIA SOLTANI**

**Role:** Software Asset Management Consultant  
**Years at Crayon:** 1.5  
**Location:** Sweden

•• Being a volunteer in our sustainability strategy has been an opportunity to engage in something I believe is important, and seeing how much we value and prioritize ESG makes me proud of being a part of Crayon.

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# Global carbon emissions and energy consumption

## Global emissions (tCO2e)

	2021
Scope 1 + 2 + 3 (market-based)	3,371.7
Scope 1%	17%
Scope 2%	65%
Scope 3%	18%
Scope 1 + 2 + 3 (location-based)	1,952.1
Scope 1%	29%
Scope 2%	40%
Scope 3%	31%

## Scope 1 and 2 emissions (tCO2e)

	2021
Direct (Scope 1) GHG emissions	568.8
Indirect location-based (Scope 2) GHG emissions	773.5
Indirect market-based (Scope 2) GHG emissions	2,193.1

## Scope 3 emissions (tCO2e)

	2021
Upstream and downstream indirect (Scope 3)	609.8
Waste generated in operations	62
Business travel	547.8

## Carbon reporting breakdown by region

	Scope 1 emissions	Scope 2 emissions	Scope 3 emissions	Total emissions
APAC	-	46.3	9.3	55.6
Central Eastern Europe	21.6	46.4	37.7	105.7
DACH (Germany, Austria, Switzerland)	14.1	98.4	55.5	168
Europe (UK, Iceland, Netherlands)	31.5	47	11.8	90.3
India	0	46.6	24	52.2
MEA	0	146.1	48.3	194.4
Nordics (Norway, Sweden, Finland, Denmark)	490.2	13	50.3	553.5
Southern Europe (Spain, France, Portugal)	6.7	13.4	54.8	74.9
USA	0.2	90	119.9	210.1
Crayon Group	0	2.5	5.4	7.9
Sensa	2.1	-	23.9	26
Sequent	2.4	109.1	1.7	113.2
Puzzlepart	0	0.2	2.5	2.7
Complit	0	0.5	0.4	0.9
Anglepoint	0	28.5	132.8	161.3
Inmeta	0	6	4.3	10.3
Kryptos	0	79.6	27.2	106.8
<b>Total emissions</b>	<b>568.8</b>	<b>773.5</b>	<b>609.8</b>	<b>1,952.1</b>

## Global carbon emissions and energy consumption continued

### 2021 Energy consumption (MWh)

	2021
<b>Total Crayon energy consumption within the organization</b>	<b>7,974.6</b>
<b>Total energy consumption within the organization from non-renewable sources, in joules or multiples</b>	<b>4,126.4</b>
Consumption from Heavy-oil	822.0
Consumption from Diesel	1,449.1
Consumption of other non-renewable energy	1,855.3
<b>Total energy consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.</b>	<b>3,848.2</b>
Consumption of biomass energy	76.3
Consumption of other renewable energy	3,771.9

### Waste generated, diverted and disposed by composition (kg)<sup>1</sup>

	2021					
	Waste generated	Waste diverted from disposal	Percent	Waste directed to disposal	Percent	
EE Waste	525	525	100%	-	-	
Glass waste	824	824	100%	-	-	
Hazardous waste	-	-	-	-	-	
Industrial waste	-	-	-	-	-	
Metal waste	91	91	100%	-	-	
Organic waste	16,098	13,728	85%	2,370	15%	
Paper waste	11,502	11,502	100%	-	-	
Plastic waste	1	1	100%	-	-	
Residual waste	187,841.5	62,284	33%	125,557.5	67%	
<b>Total waste generated (kg)</b>	<b>216,882.5</b>	<b>88,955</b>	<b>41%</b>	<b>127,927.5</b>	<b>59%</b>	

<sup>1</sup> Where values are missing it means that no data has been collected and not that there has been no emissions. Crayon is undergoing a full scope 3 accounting.

## Global Reporting Initiative (GRI) tables

GRI Standard	No.	Disclosure	Location
GRI 2: General Disclosures 2021	2-1	Organizational details	Legal name: Crayon Group Holding ASA Ownership: A public limited company incorporated under the laws of Norway HQ: Oslo, Norway Countries of operation: <a href="#">Global footprint</a>
	2-2	Entities included in the organization’s sustainability reporting	<a href="#">Global footprint</a> Environmental data covers all of Crayon. Some employee data excludes Sensa and rhipe as they are still not fully integrated in the Crayon HR data. Where data does not cover all of Crayon, a footnote is added.
	2-3	Reporting period, frequency and contact point	This is Crayon’s first global ESG report. Data is reported for 1 January to 31 December 2021. It will be published on an annual basis. For more information please contact: <a href="mailto:integrity@crayon.com">integrity@crayon.com</a>
	2-7	Employees	<a href="#">People</a>
	2-9	Governance structure and composition	Annual report, Executive Management, p. 9 Annual report, Board of Directors, p. 20 <a href="http://www.crayon.com/investor-relations/leadership/">www.crayon.com/investor-relations/leadership/</a>
	2-11	Chair of the highest governance body	Executive and Operational Management
	2-15	Conflicts of interest	<a href="#">Integrity, risk, and compliance</a>
	2-19	Remuneration policies	Annual report, Note 21 Management remuneration, p. 51
	2-22	Statement on sustainable development strategy	<a href="#">Environmental, Social, and Governance strategy</a>
	2-26	Mechanisms for seeking advice and raising concerns	<a href="#">Integrity, risk, and compliance</a>
	2-29	Approach to stakeholder engagement	<a href="#">Materiality analysis</a>
GRI 3: Material Topics 2021	3-1	Process to determine material topics	<a href="#">Materiality analysis</a>
	3-2	List of material topics	<a href="#">Materiality analysis</a>
GRI 205: Anti-corruption 2016	205-2	Communication and training about anti-corruption policies and procedures	<a href="#">Business ethics and integrity</a>
GRI 302: Energy 2016	302-1	Energy consumption within the organization	<a href="#">Race to net zero</a> <a href="#">Global carbon emissions and energy consumption</a>

## GRI continued

GRI Standard	No.	Disclosure	Location
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	<a href="#">Race to net zero</a> <a href="#">Global carbon emissions and energy consumption</a>
	305-2	Energy indirect (Scope 2) GHG emissions	<a href="#">Race to net zero</a> <a href="#">Global carbon emissions and energy consumption</a>
	305-3	Other indirect (Scope 3) GHG emissions	<a href="#">Race to net zero</a> <a href="#">Global carbon emissions and energy consumption</a>
GRI 306: Waste 2020	306-3	Waste generated	<a href="#">Environmental management</a> <a href="#">Global carbon emissions and energy consumption</a>
	306-4	Waste diverted from disposal	<a href="#">Environmental management</a> <a href="#">Global carbon emissions and energy consumption</a>
	306-5	Waste directed to disposal	<a href="#">Environmental management</a> <a href="#">Global carbon emissions and energy consumption</a>
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	<a href="#">People</a>
GRI 403: Occupational Health and Safety 2018	403-9	Work-related injuries	<a href="#">Employee well-being</a>
	403-10	Work-related ill health	<a href="#">Employee well-being</a>
GRI 404: Training and Education 2016	404-2	Programs for upskilling employees and transitioning to new roles	<a href="#">Employee well-being</a>
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	<a href="#">People</a> <a href="#">Diversity, equity, and inclusion in numbers</a>

## Sustainability Accounting Standards Board (SASB) tables

Theme	Disclosure	Information	
Environmental Footprint of Hardware Infrastructure	TC-SI-130a.1.	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	(1) <a href="#">Race to net zero</a> (2) 100% of energy is from the grid 50% of energy is renewable
	TC-SI-130a.2.	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Currently, this data is not tracked globally. Crayon is investigating how to manage this in future.
	TC-SI-130a.3.	Discussion of the integration of environmental considerations into strategic planning for data center needs	Our biggest energy requirements are from our data centers, these are based in Norway and Iceland. These data centers have electricity grids with 98% and 100% of renewable energy share, respectively.
Data Privacy and Freedom of Expression	TC-SI-220a.1.	Description of policies and practices relating to behavioral advertising and user privacy	Crayon's commitment to Data Protection
	TC-SI-220a.2.	Number of users whose information is used for secondary purposes	0, no processing of user personal data is performed outside the parameters of individual lawful basis and records of processing.
	TC-SI-220a.3.	Total amount of monetary losses as a result of legal proceedings associated with user privacy	0, no monetary losses as a result of legal proceedings.
	TC-SI-220a.4.	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	0, no law enforcement requests for user information.
	TC-SI-220a.5.	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	0, no Crayon core products or services are being monitored, blocked, content filtered, or censored.
Data Security	TC-SI-230a.1.	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	0, no breaches in 2021.
	TC-SI-230a.2.	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Please refer to our Document Center and Data Protection and Security FAQs And on our <a href="#">website</a>
Recruiting and Managing a Global, Diverse and Skilled Workforce	TC-SI-330a.1.	Percentage of employees that are: (1) foreign nationals and (2) located offshore	(1) we do not currently have a global overview of employees requiring a visa in their country of employment. This is something we are looking to centralise in the future (2) 79% of our employees are outside of Norway
		Employee engagement as a percentage	We have not initiated an employee engagement survey at this time but this is planned for 2022.
	TC-SI-330a.3.	Percentage of gender and racial/ethnic group representation for: (1) management, (2) technical staff, and (3) all other employees	(1) 42.8% female (2) 21% female (3) 31% female As of 2021, we only tracked gender, we are looking to include other diversity factors in the future. <a href="#">People</a>

## SASB continued

Theme	Disclosure	Information
Intellectual Property Protection and Competitive Behavior	TC-SI-520a.1.	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations
Managing Systemic Risks from Technology Disruptions	TC-SI-550a.1.	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime
	TC-SI-550a.2.	Description of business continuity risks related to disruptions of operations
		<p>(1) 30                      (2) 25                      (3) 3,234 minutes<sup>1</sup></p> <p><sup>1</sup> We had a total of 3234 minutes of interruptions, but as we do not license Cloud-iQ – no licenses were affected.</p> <p>Cloud-iQ and Service-iQ are customers portals offering customers self-provisioning of tasks related to Software Licensing and Cloud Services as:</p> <ul style="list-style-type: none"> <li>• Product Catalog and Pricing</li> <li>• Order and Provisioning</li> <li>• Support ticketing</li> <li>• Collaboration tools</li> <li>• Billing</li> <li>• BI reports and Analytics</li> </ul> <p>Cloud-iQ is hosted in Crayon’s on-prem data center and in Microsoft Azure. The on-premise data center consists of Crayon-owned equipment co-located in a professional data center facility.</p> <p>These customers may be subject to actual or perceived damage, interruption, vulnerabilities and other cyber-related risks outside Crayon’s control. We may experience interruptions, delays and outages in service and availability from time to time as a result of issues with our third-party cloud and hosting providers’ infrastructure.</p> <p>During performance issues and service disruptions, Crayon can continue to provide services related to Product Catalog, Pricing, Support ticketing, Order and Provisioning through customer support using publisher tools.</p> <p>The business continuity risk in these scenarios are related, therefore customers will not be able to manage these tasks in the portal, without Crayon’s support.</p> <p>Cloud Services hosted by Cloud vendors as Microsoft, AWS and Google are not affected by disruptions in Crayon’s systems.</p> <p>Billing, Collaboration Tools, BI reports and Analytics will not be available during performance issues and service disruptions.</p> <p>Crayon will not be able to deliver billing statements/reconciliation files, or BI reports for cost and usage analysis to its customers. This may have impact on the Crayon customers that are resellers and their ability to invoice their end-customers.</p>

# World Economic Forum (WEF) tables

Theme	Disclosure	Information
<b>PRINCIPLES OF GOVERNANCE</b>		
<b>Governing purpose</b>	<p><b>Setting purpose</b> The company’s stated purpose focuses on measurable outcomes in relation to economic, environmental and social issues. Corporate purpose should create value for all stakeholders, including shareholders.</p>	<p><a href="#">About Crayon</a> <a href="#">Our strategy</a></p>
<b>Quality of governing body</b>	<p><b>Governance body composition</b> Composition of the highest governance body and its committees by: competencies relating to economic, environmental and social topics; executive or non-executive; independence; tenure on the governance body; number of each individual’s other significant positions and commitments, and the nature of the commitments; gender; membership of under-represented social groups; stakeholder representation.</p>	<p>Annual report, Executive Management, p. 9 Annual report, Board of Directors, p. 20</p>
<b>Stakeholder engagement</b>	<p><b>Material issues impacting stakeholders</b> A list of the topics that are material to key stakeholders and the company, how the topics were identified and how the stakeholders were engaged.</p>	<p><a href="#">Materiality analysis</a></p>
<b>Ethical behaviour</b>	<p><b>Anti-corruption</b></p> <ol style="list-style-type: none"> <li>Total percentage of governance body members, employees and business partners who have received training on the organization’s anti-corruption policies and procedures, broken down by region. <ol style="list-style-type: none"> <li>Total number and nature of incidents of corruption confirmed during the current year, but related to previous years; and</li> <li>Total number and nature of incidents of corruption confirmed during the current year, related to this year.</li> </ol> </li> <li>Discussion of initiatives and stakeholder engagement to improve the broader operating environment and culture, in order to combat corruption.</li> </ol>	<p><a href="#">Integrity, risk, and compliance</a></p>
	<p><b>Protected ethics advice and reporting mechanisms</b> A description of internal and external mechanisms for:</p> <ol style="list-style-type: none"> <li>Seeking advice about ethical and lawful behaviour and organizational integrity; and</li> <li>Reporting concerns about unethical or unlawful behaviour and lack of organizational integrity.</li> </ol>	<p><a href="#">Integrity, risk, and compliance</a></p>
<b>Risk and opportunity oversight</b>	<p><b>Integrating risk and opportunity into business processes</b> Company risk factor and opportunity disclosures that clearly identify the principal material risks and opportunities facing the company specifically (as opposed to generic sector risks), the company appetite in respect to these risks, how these risks and opportunities have moved over time and the response to those changes. These opportunities and risks should integrate material economic, environmental and social issues, including climate change and data stewardship.</p>	<p><a href="#">Integrity, risk, and compliance</a> <a href="#">TCFD table</a></p>

## WEF continued

Theme	Disclosure	Information
<b>PLANET</b>		
<b>Climate change</b>	<b>Greenhouse gas (GHG) emissions</b> For all relevant greenhouse gases (e.g. carbon dioxide, methane, nitrous oxide, F-gases etc.), report in metric tonnes of carbon dioxide equivalent (tCO2e) GHG Protocol Scope 1 and Scope 2 emissions. Estimate and report material upstream and downstream (GHG Protocol Scope 3) emissions where appropriate.	<a href="#">Race to net zero</a> <a href="#">Global carbon emissions and energy consumption</a>
	<b>TCFD implementation</b> Fully implement the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). If necessary, disclose a timeline of up to three years for full implementation. Disclose whether we have set, or have committed to set, GHG emissions targets that are in line with the goals of the Paris Agreement – to limit global warming to well below 2°C above pre- industrial levels and pursue efforts to limit warming to 1.5°C – and to achieve net zero emissions before 2050.	Crayon has initiated the process for TCFD implementation <a href="#">TCFD table</a> <a href="#">Race to net zero</a> <a href="#">Integrity, risk, and compliance</a>
	<b>Nature loss</b>	<b>Land use and ecological sensitivity</b> Report the number and area (in hectares) of sites owned, leased or managed in or adjacent to protected areas and/ or key biodiversity areas (KBA).
<b>Freshwater availability</b>	<b>Water consumption and withdrawal in water-stressed areas</b> Report for operations where material: megalitres of water withdrawn, megalitres of water consumed and the percentage of each in regions with high or extremely high baseline water stress, according to WRI Aqueduct water risk atlas tool. Estimate and report the same information for the full value chain (upstream and downstream) where appropriate.	We do not track this at a global level but are investigating how to do this in the future.
<b>PEOPLE</b>		
<b>Diversity and equality</b>	<b>Diversity and inclusion (%)</b> Percentage of employees per employee category, by age group, gender and other indicators of diversity (e.g. ethnicity).	<a href="#">People</a> <a href="#">Diversity, equity, and inclusion in numbers</a>
	<b>Pay equality (%)</b> Ratio of the basic salary and remuneration for each employee category by significant locations of operation for priority areas of equality: women to men, minor to major ethnic groups, and other relevant equality areas.	Until now, salaries in Crayon are agreed upon individually. We are working on centralising and levelling salaries.
	<b>Wage level (%)</b> Ratios of standard entry level wage by gender compared to local minimum wage. Ratio of the annual total compensation of the CEO to the median of the annual total compensation of all its employees, except the CEO.	Until now, salaries in Crayon are agreed upon individually. We are working on centralising and levelling salaries. To see remuneration of our management please refer to Annual report, Note 21 Management remuneration, p. 51
	<b>Risk for incidents of child, forced or compulsory labour</b> An explanation of the operations and suppliers considered to have significant risk for incidents of child labor, forced or compulsory labor. Such risks could emerge in relation to: a) type of operation (such as manufacturing plant) and type of supplier; and b) countries or geographic areas with operations and suppliers considered at risk.	The nature of the activities means the risk of child, forced or compulsory labor is very low. We have activities in India however Crayon does not engage in child, forced or compulsory labor.

## WEF continued

Theme	Disclosure	Information
Health and well-being	<p><b>Health and safety (%)</b> The number and rate of fatalities as a result of work-related injury; high-consequence work-related injuries (excluding fatalities); recordable work-related injuries; main types of work-related injury; and the number of hours worked.</p> <p>An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided for employees and workers.</p>	<p><a href="#">Employee well-being</a> 0 deaths and 0 injuries in 2021. Due to the nature of Crayon's work, we do not track hours worked.</p>
Skills for the future	<p><b>Training provided (#, \$)</b> Average hours of training per person that the organization's employees have undertaken during the reporting period, by gender and employee category (total number of training hours provided to employees divided by the number of employees).</p> <p>Average training and development expenditure per full time employee (total cost of training provided to employees divided by the number of employees).</p>	<p>At this stage we do not track the average number of hours of training, nor the average training and development expenditure per employee. We are looking into how to do this in the future. For total hours of training in 2021 see <a href="#">Employee well-being</a></p>
<b>PROSPERITY</b>		
Employment and wealth generation	<p><b>Absolute number and rate of employment</b></p> <ol style="list-style-type: none"> <li>Total number and rate of new employee hires during the reporting period, by age group, gender, other indicators of diversity and region.</li> <li>Total number and rate of employee turnover during the reporting period, by age group, gender, other indicators of diversity and region.</li> </ol>	<ol style="list-style-type: none"> <li>Direct economic value generated and distributed (EVG&amp;D) <ul style="list-style-type: none"> <li>Revenues: Annual Report, consolidated statement of profit or loss and other comprehensive income, p.27</li> <li>Operating costs: Annual Report, consolidated statement of profit or loss and other comprehensive income, p.27</li> <li>Employee wages and benefits: Annual Report, consolidated statement of profit or loss and other comprehensive income, p. 27</li> <li>Payments to providers of capital: Annual Report, consolidated statement of cash flows, p. 29</li> <li>Payments to government: Annual Report, consolidated statement of profit or loss and other comprehensive income, p. 27</li> <li>Community investment: <a href="#">Supporting local communities</a></li> </ul> </li> <li>Annual report, Note 4, forgivable loan, p. 38</li> </ol>
	<p><b>Financial investment contribution</b></p> <ol style="list-style-type: none"> <li>Total capital expenditures (CapEx) minus depreciation, supported by narrative to describe the company's investment strategy.</li> <li>Share buybacks plus dividend payments, supported by narrative to describe the company's strategy for returns of capital to shareholders.</li> </ol>	<ol style="list-style-type: none"> <li>Annual Report, Consolidated statement of cash flows, p. 29</li> <li>Annual Report, allocation of earnings for the year, p. 17</li> </ol>
Innovation of better products and services	<p><b>Total R&amp;D expenses (\$)</b> Total costs related to research and development.</p>	Annual Report, Note 8 Intangible assets, p. 41
Community and social vitality	<p><b>Total tax paid</b> The total global tax borne by the company, including corporate income taxes, property taxes, non-creditable VAT and other sales taxes, employer-paid payroll taxes, and other taxes that constitute costs to the company, by category of taxes.</p>	Annual Report, Note 12 Tax, p. 43

# United Nations Global Compact (UNGC) tables

Theme	Disclosure	Information
<b>HUMAN RIGHTS</b>		
	<b>Principle 1</b> Businesses should support and respect the protection of internationally proclaimed human rights; and	<a href="#">People</a> <a href="#">Integrity Crayon Policy 2021</a> <a href="#">Partner Integrity Crayon Policy 2021</a>
	<b>Principle 2</b> make sure that they are not complicit in human rights abuses.	<a href="#">People</a> <a href="#">Integrity Crayon Policy 2021</a> <a href="#">Partner Integrity Crayon Policy 2021</a> <a href="#">Third party management</a>
<b>LABOR</b>		
	<b>Principle 3</b> Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	Employees in Austria, Sweden and Iceland are subject to collective bargaining agreements under national law. <a href="#">People</a> <a href="#">Integrity Crayon Policy 2021</a> <a href="#">Partner Integrity Crayon Policy 2021</a> <a href="#">Third Party management</a>
	<b>Principle 4</b> the elimination of all forms of forced and compulsory labor;	<a href="#">Integrity Crayon Policy 2021</a> <a href="#">Partner Integrity Crayon Policy 2021</a> <a href="#">Third Party management</a>
	<b>Principle 5</b> the effective abolition of child labor; and	<a href="#">People</a> <a href="#">Integrity Crayon Policy 2021</a> <a href="#">Partner Integrity Crayon Policy 2021</a> <a href="#">Third Party management</a>
	<b>Principle 6</b> the elimination of discrimination in respect to employment and occupation.	<a href="#">People</a> <a href="#">Integrity Crayon Policy 2021</a> <a href="#">Partner Integrity Crayon Policy 2021</a>

## UNGC continued

Theme	Disclosure	Information
<b>ENVIRONMENT</b>	<p><b>Principle 7</b> Businesses should support a precautionary approach to environmental challenges;</p>	<p>Crayon supports the precautionary approach and we are committed to acting and adopting best practices to minimize our environmental impact and improve performance. Two key principles of our 2021 Environmental policy is that we: a) Conduct business in an environmentally responsible manner and seek ways to reduce the impact of our facilities and operations on the environment, with a focus on pollution prevention and the efficient use of natural resources and energy, b) Ensure compliance with all relevant environmental laws and regulations of the jurisdictions in which Crayon operates, <a href="#">Race to net zero</a> <a href="#">Environmental management</a> <a href="#">Green IT and circular economy</a> <a href="#">Integrity, risk, and compliance</a></p>
	<p><b>Principle 8</b> Undertake initiatives to promote greater environmental responsibility; and</p>	<p><a href="#">Race to net zero</a> <a href="#">Environmental management</a> <a href="#">Green IT and circular economy</a> <a href="#">Integrity, risk, and compliance</a></p>
	<p><b>Principle 9</b> Encourage the development and diffusion of environmentally friendly technologies</p>	<p><a href="#">Data management to support the Arctic</a> <a href="#">Integrity, risk, and compliance</a> <a href="#">The Crayon ESG Innovation Fund</a> <a href="#">Products and services for ESG</a></p>
<b>ANTI-CORRUPTION</b>	<p><b>Principle 10</b> Businesses should work against corruption in all its forms, including extortion and bribery.</p>	<p><a href="#">Integrity, risk, and compliance</a> <a href="#">Integrity Crayon Policy 2021</a> <a href="#">Partner Integrity Crayon Policy 2021</a></p>

# Task Force on Climate-related Financial Disclosures (TCFD) Tables

Theme	Disclosure	Information
<b>GOVERNANCE</b>	a) Describe the Board’s oversight of climate-related risks and opportunities.	<p><b>Governance structure</b> The ESG committee also has accountability and oversight for ensuring the company’s management is reviewing, assessing and mitigating climate related risks and opportunities. Any material ESG risks are also presented to the Audit and Risk committee, as well as the Board, as part of the Enterprise Risk Management Review.</p>
	b) Describe management’s role in assessing and managing climate-related risks and opportunities.	<p><b>Governance structure</b> <b>Integrity, risk, and compliance</b> The ESG committee also has accountability and oversight for ensuring the company’s management is reviewing, assessing and mitigating climate-related risks and opportunities. Any material ESG risks are also presented to the Audit and Risk committee, as well as the Board, as part of the Enterprise Risk Management Review.</p>
<b>STRATEGY</b>	a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	<p><b>Risks:</b> Crayon has operations in over 45 countries. This exposes us to a diverse set of risks associated with natural disasters such as extreme weather, including floods, storms, and the effects of extreme heat.</p> <p>Some of the impacts on our business operations include physical damage to buildings or assets from increased incidence of extreme weather events, additional cooling needs for buildings and data centers due to extreme heat, and general operational shutdown of our business operations due to climate-related incidents.</p> <p>We review the risks of potential regulatory changes as a result of political pressure to respond to climate change. This could lead to dramatic impacts on our business operations such as restricted access to energy or sudden and severe increase in prices of energy.</p> <p>Our supply chains are diverse and global so all forementioned risks related to climate change and extreme weather will have a potential impact on our supply chains, and therefore on our ability to source the products and services needed to provide our end-services.</p> <p><b>Opportunities:</b> We see potential business opportunities from increased focus on climate change, either through changing business operations or new regulation.</p>

## TCFD continued

Theme	Disclosure	Information
<b>STRATEGY CONTINUED</b>	<p>b) Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning.</p>	<p>Climate change considerations influence our business operations. We are setting goals to tackle the major sources of our energy consumptions and emissions. Electricity consumption is the largest source of our direct emissions. We manage this risk by integrating energy efficiency measures in our operations and into the purchasing of our IT equipment. We are also incorporating the latest energy efficiency techniques in the building of our new HQ in Oslo, Norway.</p> <p>As companies implement their commitments to reduce their environmental impact and develop carbon targets, we see potential opportunities to assist companies in their carbon reduction strategies. See our chapter <a href="#">Products and services for ESG</a>.</p> <p>Crayon has committed to setting science-based targets to be submitted for validation before 2024 according to the net zero standard aligned with a 1,5 degree pathway. In the interim period Crayon will pursue a target of at least 40% reduction in GHG emissions from own operations by 2030 and will work with suppliers and customers to reach the same target for scope three emissions.</p>
	<p>c) Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.</p>	<p>The commitment to Science Based targets and interim targets for 2030 ensures both immediate action on GHG emission reduction and the transition to alignment with science based targets driving resilient climate action.</p> <p>Our current climate mitigation initiatives are below:  <a href="#">Products and services for ESG</a>  <a href="#">New headquarters in Oslo</a>  <a href="#">The Crayon ESG innovation fund</a></p>
<b>RISK MANAGEMET</b>	<p>a) Describe the organization’s processes for identifying and assessing climate-related risk</p> <p>b) Describe the organization’s processes for managing climate-related risks.</p> <p>c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.</p>	<p><a href="#">Integrity, risk, and compliance</a></p> <p><a href="#">Integrity, risk, and compliance</a></p> <p><a href="#">Integrity, risk, and compliance</a></p>
<b>METRICS AND TARGETS</b>	<p>a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.</p> <p>b) Disclose scope 1, scope 2, and, if appropriate, scope 3 greenhouse gas (GHG) emissions, and the related risks.</p> <p>c) Describe the targets used by the organization to manage climate-related risks, opportunities and performance against targets.</p>	<p><a href="#">Race to net zero</a>  <a href="#">Environmental management</a>  <a href="#">Green IT and circular economy</a>  <a href="#">Global carbon emissions and energy consumption</a></p> <p><a href="#">Race to net zero</a>  <a href="#">Global carbon emissions and energy consumption</a></p> <p><a href="#">Race to net zero</a>  <a href="#">Ambitions summarized</a></p>

