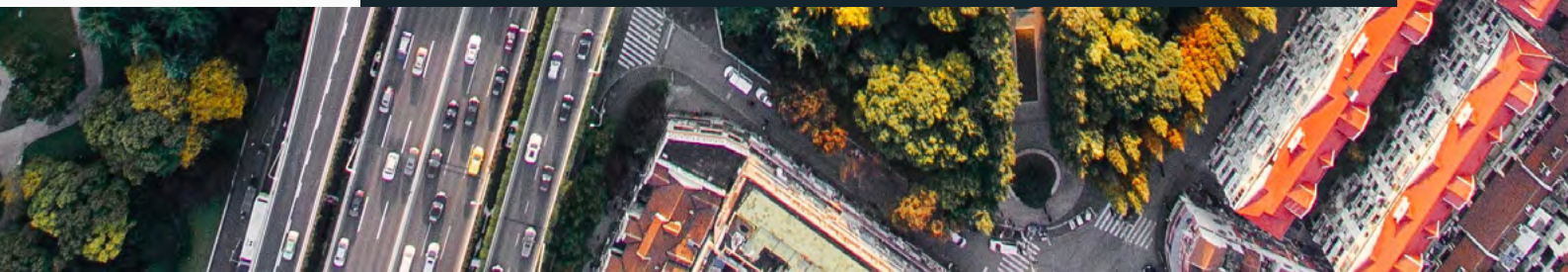




eBoks

UN Global Compact
Communication on Progress

2021



A letter from our CEO

In 2021, more than 21 million citizens across the world used their secure digital postbox, delivered by e-Boks, to access, sign, and store critical documents from more than 30,000 public and private institutions – banks, insurance and pension funds, and utility companies. Through our secure platforms and digital postboxes, e-Boks plays a critical role in creating digital societies with citizens' rights at the heart. The past few years with the COVID-19 virus have shown us just how important a stable and efficient digital infrastructure is for society. In 2021, the number of documents distributed via e-Boks increased by 22%, after another all-time high year.

For me and the entire e-Boks team, we have a responsibility we never take lightly. I was particularly proud of our platform and team when e-Boks, with only a few days' notice from the Danish Agency for Digitisation, managed to ensure that all Danish citizens could stay on e-Boks without experiencing any disruptions, while the infrastructure to a new digital public postbox solution was rolled out.

The new solution was planned to go live by 30th November 2021, when the Agency for Digitisation on 24th November 2021 decided to delay due to a pressured health care system. The reliability of a digital post solution was of critical importance for society at the time, especially since there was constant information on the COVID-19 pandemic going out from public authorities, including invitations to public vaccination schemes.

Going forward, e-Boks will remain a display client of public digital post in Denmark, and so far, over 4.3 million Danes have consented to stay on e-Boks, receiving their public documents together with documents from private senders.

In the past few years, we have experienced growing public and private interest in our platform and solutions from across the world. In 2020, e-Boks entered a partnership with the national telecommunication company in Bahrain, Batelco, to work together to bring secure digital postbox solutions to the region. In January 2022, the new Batelco affiliate Beyon Connect was launched charged with rolling out the secure e-Boks solution named OneBox, and the secure digital ID, OneID, to Bahrain and beyond. This is an exciting development, which gives me confidence that we through such partnerships can scale our impact significantly.

To me, this is much more than capturing market shares. This is about playing a meaningful role in building digital infrastructures with human freedoms and rights at the core: The right to legal identity, to privacy, to easy and secure access to critical public and private communication, and to keeping one's own personal data. While many Governments and private enterprises are approaching e-Boks because they admire what we have achieved in Denmark and the Nordics, there is no doubt that our experience-base is not one-to-one transferrable. That's why we need strong partners on the ground, who share our values and beliefs. Once that has been established, we can

build on e-Boks digital platform and technologies, to co-create new digital solutions and services that can improve the user experience in the local setting.

In recent years, we have experienced a growing interest from our public and private stakeholders in e-Boks' approach to sustainability. This is a development we welcome, as it confirms that all the work and effort, we put into being a sustainable business is valued by our stakeholders and is critical to our success as a business. That's also why we this year have structured our CoP report as an ESG report with early steps to report in line with the Global Reporting Initiative (GRI), including steps to setting science-based emission reduction targets in line with the Paris Climate Agreement. For a small-sized company like e-Boks this is a big undertaking, and one we prioritize as an underlying foundation for our growth scenario. But allow me to also share my concerns that we as a business community risk turning sustainability into a box-ticking exercise more than a strategic value creation effort: Staying in compliance can never be a driver of transformation. To deliver sustainable environmental and social impact where it matters most, we need to mobilize the passion, ingenuity, and determination of our employees, partners, and stakeholders. Our commitment to the UN Global Compact and its Ten Universal Principles is unwavering as is our ambition of creating environmental and social impact towards Sustainable Development Goals 12, 13 and 16.

I would like to end by thanking the entire e-Boks team for staying the course during yet another roller-coaster year. During a succession of COVID-19 restrictions, the e-Boks team managed to keep motivation and team spirit high, and for that I am gratefully anticipating more normal days where we can meet over a cup of coffee and talk about every-day things. Also, a heartfelt thank you to our partners and users across the world for choosing and using e-Boks 📧

Ulrik Falkner Thagesen
CEO
e-Boks



The past few years with the COVID-19 virus have shown us just how important a stable, and efficient digital infrastructure is for society.

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Our environmental responsibility:
Contributing to a greener world

16



Our social responsibility:
Contributing to better digital societies

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Our governance responsibility:
Maintaining and building trust

24



This is e-Boks 2021 Communication on Progress to the UN Global Compact where we present how we through our business take environmental responsibility to contribute to a greener world; contribute to better digital societies; and maintain and build stakeholder trust. The 2021 report marks a step up the learning-curve for e-Boks sustainability reporting, where we account for our Environmental, Social and Governance Impact. It is also our first attempt at reporting in alignment with the Carbon Disclosure Project and the Global Reporting Initiative (GRI). We welcome any feedback and input from our stakeholders to how we can improve. Sustainability is an integral part of e-Boks business model and part of our sustainable growth strategy.



About e-Boks

e-Boks is a trusted provider of secure platforms and digital postboxes. We offer companies, public authorities, and private citizens across the world an effective, secure, and user-friendly platform for digital communication. In 2001, e-Boks was launched to facilitate a secure and more effective way for companies to communicate with their customers and public authorities with citizens. Since then, e-Boks has played a pivotal role in digitalizing the infrastructure in Denmark and across the Nordics. According to the OECD, Denmark remains among the best countries in the world to provide digital public services and no 1 when it comes to user-driven digital services. Today, 90% of all Danish citizens have a secure digital postbox accessed with their personal secure digital ID provided by e-Boks.

e-Boks is an independent limited company co-owned by Nets and PostNord, providing national digital post solutions to the governments of Denmark, Greenland, Norway, Sweden and Ireland. Additionally, well-renowned international banks, insurance companies, and energy service providers have chosen to use the secure e-Boks platform instead of pursuing their own solutions. In 2021, e-Boks entered a partnership with the Government of Bahrain, paving the way for e-Boks to expand its reach to the United Arab Emirates and beyond.

Our purpose & mission

It is e-Boks purpose to create better digital societies by:

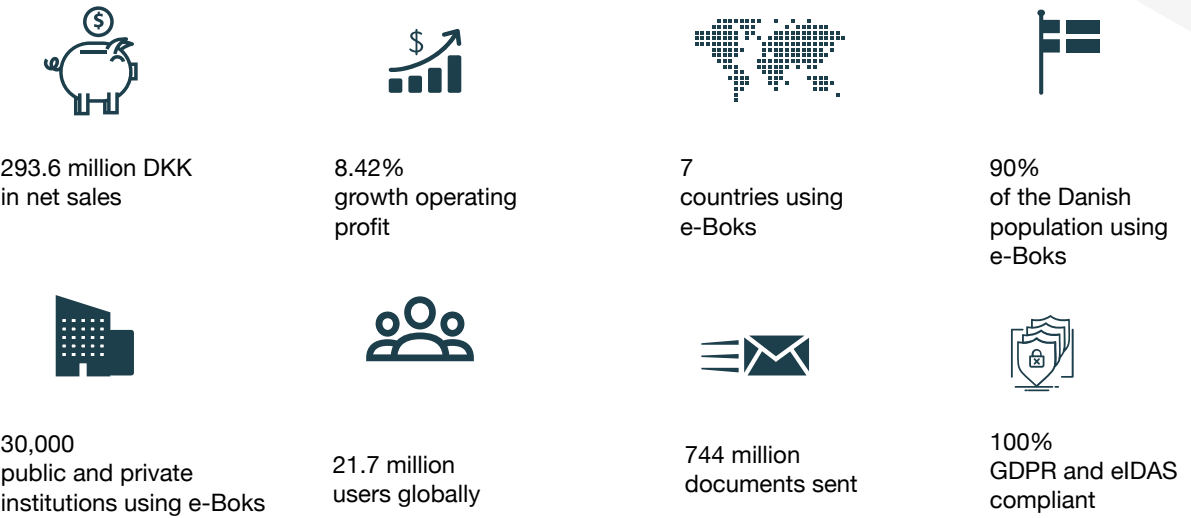


Protecting and safe-guarding citizens' rights

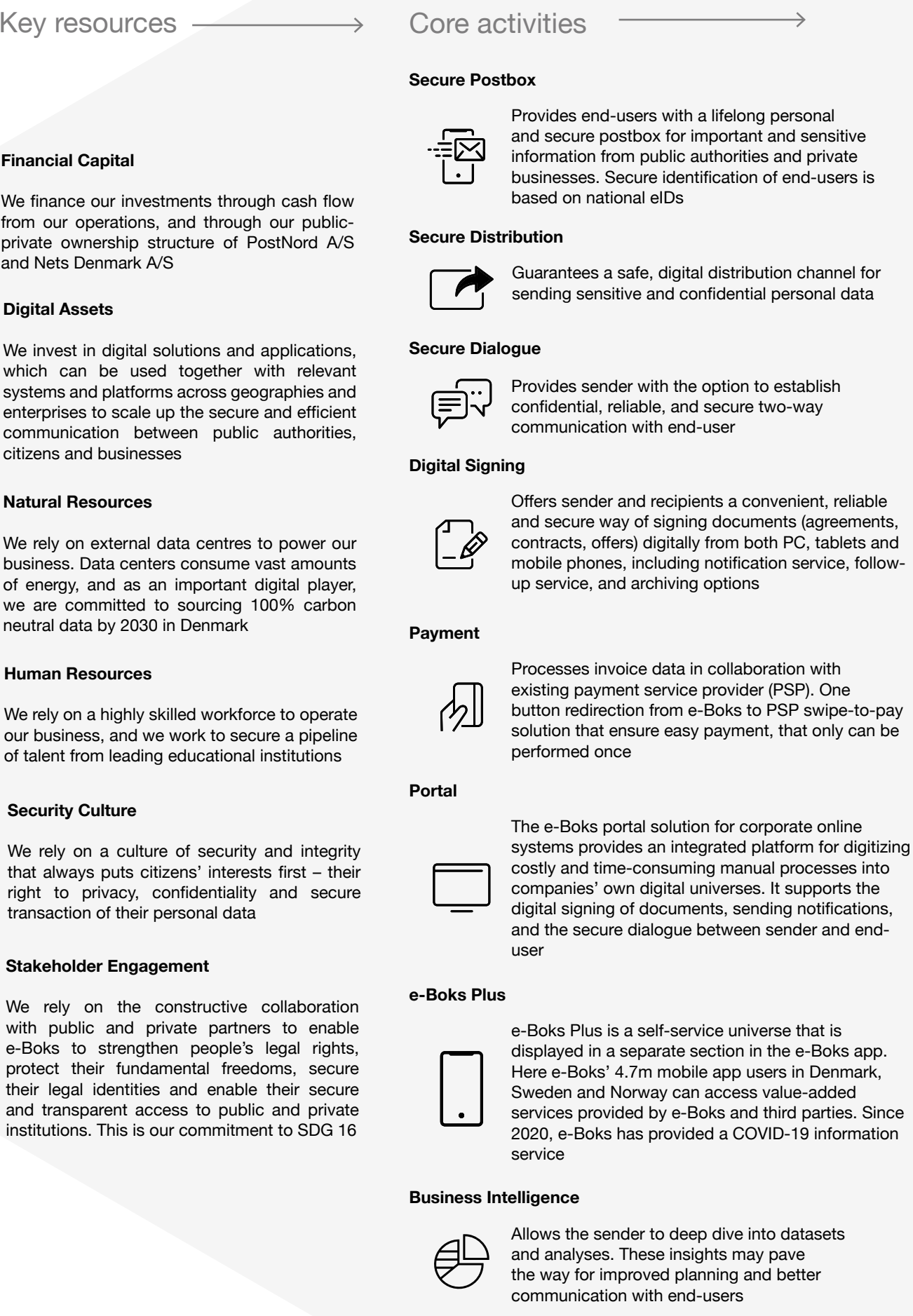


Reducing the environmental footprint of our public and private partners and their users

2021 i numbers



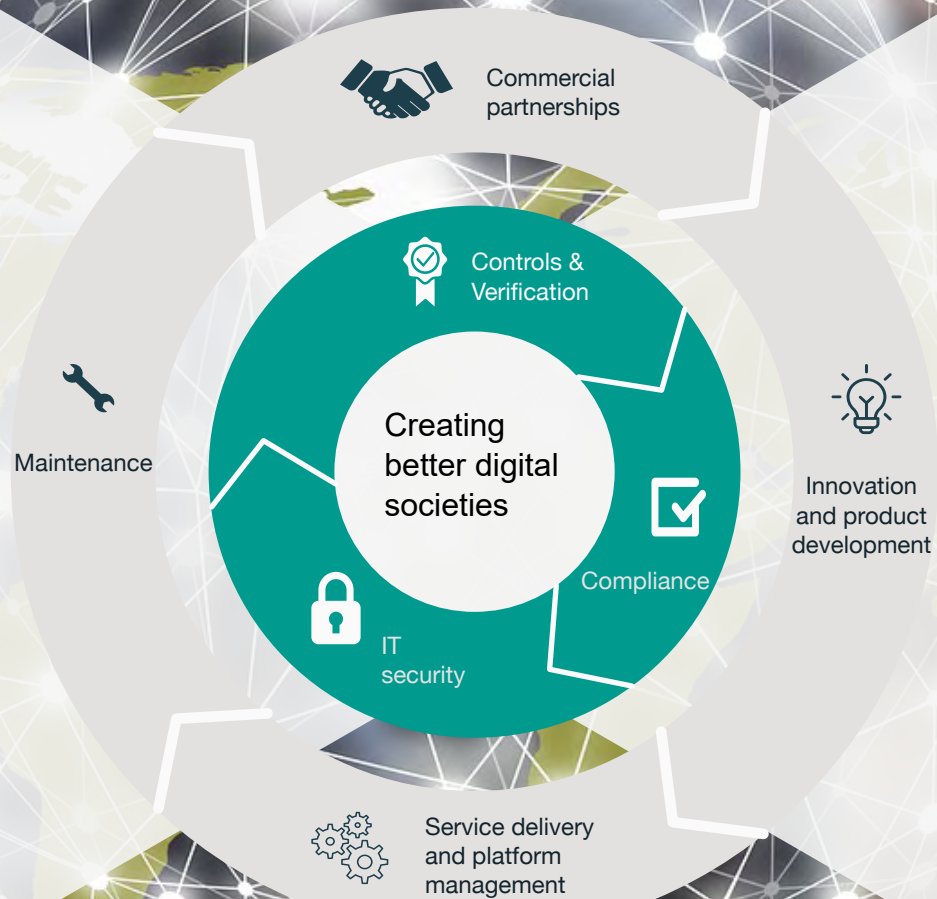
Our Business model



How we create value for society

Resources

- 21 years of experience as a provider of secure, effective and user-friendly digital infrastructures
- Insights from public-private partnerships in 7 countries
- Co-creation with users
- 30,000 public and private institutions using e-Boks
- Danish data center provider carbon neutral by 2030
- Financial resources
- Diverse talent



Protecting and safeguarding citizen's rights

- 21.7 million users had access to secure digital post in 2021
- 100% GDPR and eIDAS compliant
- 100% delivery guarantee of secure digital documents



Reducing CO2 emissions

- 744 million digital documents sent in 2021
- 8,858 tons of CO2e saved in 2021



Reducing resource consumption

- 4.3 billion litres of water saved in 2021
- 12,283 tons paper saved in 2021
- 98,264 trees saved in 2021



Lower costs

- Up to 80% savings on distribution costs



Diverse talent amongst our employees

- 24% women
- 76% men
- 8 nationalities
- Best Place to Work Certified 5th year in a row



Committed to working in accordance with the Ten Universal Principles of the UN Global Compact



Driving a sustainable business: Our approach to ESG

As a provider of secure digital postboxes, e-Boks delivers an important part of the societal infrastructure that makes modern democracies function and thrive. Our corporate purpose is to deliver better digital societies, and at the heart of this promise are citizens' fundamental and inviolable rights and freedoms – to privacy, anonymity, freedom of expression, and the equitable access to public information.

External commitments

e-Boks is a signatory to the United Nations (UN) Global Compact since 2019 and remains committed to integrating the ten universal principles of Human Rights, Labour, Environment, and Anti-Corruption into our strategy and operations, as well as in our supply chain.

The Ten Principles are integrated into the [e-Boks code of business conduct](#), which is anchored with our Board

of Directors and Management Board, and the progress is tracked annually through the UN Global Compact Communication on Progress. It forms the backbone for our strategic decisions and daily activities and is operationalized and monitored through policies, codes of conduct, and external standards. The e-Boks code of business conduct extends to our external collaborators and guides our way of working with contractors, suppliers, and partners.

e-Boks way of doing business:



We place human rights at the core of our business - above all else, it is essential that clients and users trust that e-Boks observes the following principles in the way we develop and manage our systems – integrity, availability, confidentiality, and privacy.



We strive to be a great place to work - our people policy and [labour code of conduct](#) set out to ensure that all e-Boks' employees, as well as contractors, no matter where they are located in the world, are offered optimal and safe working conditions with respect for their private lives.



We are in the business of protecting the environment - from data warehousing to the offering of digital alternatives to the physical mail distribution and storage of documents – e-Boks seeks to decrease our environmental footprint through collaboration with our suppliers, clients and users, as well as by looking at our own emissions.



Stakeholder and suppliers' trust is our license to operate - trust is a prerequisite for our ability to maintain and grow our business. Our [e-Boks code of business conduct](#) describes how e-Boks strives to engage with our stakeholders with respect and in compliance with rules and regulations, while upholding high ethical standards in everything we do. Acting honestly, decently, and responsibly is a fundamental part of our values. We provide continuous training to our employees, endorse a speak-up culture, and provide means to report unethical behavior in a safe and anonymous way.

Stakeholder engagement

e-Boks is working closely with stakeholders to understand and respond to their key concerns, expectations and needs. We draw on stakeholder insights, feedback and partnerships to understand where we have the greatest risks and potential for delivering stakeholder impact - short and long term.

Stakeholder	How we engage
Employees	<p>Focus: Employee safety, physical and mental health and wellbeing, engagement, inclusion and diversity, people development, labor rights</p> <p>Structured input: On-going people development, employee-manager dialogues, tri-annual workplace risk assessment and annual employee-driven Great Place to Work™ assessment</p>
Talent	<p>Focus: e-Boks awareness and reputation among IT professionals and other talents</p> <p>Structured input: Annual reputation survey conducted by the Danish tech media Computer World. Engaging with higher educations. e-Boks talent development internally.</p>
Regulators	<p>Focus: Emerging standards and regulatory requirements for data platform providers</p> <p>Structured input: Regular meetings with public agencies for digitisation in countries where e-Boks is present or is building a presence</p>
Policy makers	<p>Focus: How e-Boks best aligns with and contributes to EU's vision and targets for digital transformation by 2030 as well as policy priorities for the development of digital public infrastructures outside of EU</p> <p>Structured input: Closely following the European Commission and its Europe's Digital Decade 2030. Dialogue with national policy makers and public authorities within and outside the EU about expectations to how e-Boks can deliver long-term value</p>
Industry associations	<p>Focus: Stakeholder trends, concerns and expectations to the wider IT sector and opportunities for sector-wide responses</p> <p>Structured input: CEO representation in the Confederation of Danish Industry IT policy committee, CEO participation in Copenhagen FinTech and the Tech Festival's 150 Think Tank, representing 45 countries</p>
Commercial public and private partners	<p>Focus: Stakeholder expectations and requirements to e-Boks ESG performance, risks, and opportunities for e-Boks ability to deliver on its ESG commitments in the marketplace</p> <p>Structured input: Annual partner questionnaires and feedback on e-Boks ESG performance, ESG requirements in public and private tenders, on-going input on emerging data security, privacy and cyber security protection measures and standards, e.g., in the financial sector</p>
Users	<p>Focus: Application of e-Boks offerings from a user perspective, evolving user needs and concerns, user-friendliness, accessibility and relevance of e-Boks services and solutions</p> <p>Structured input: e-Boks citizen panel, pop-up user-feedback to e-Boks solutions, user prototyping of new services and concepts, on-going dialogue with civil society organisations representing people with special needs, such as the elderly and disabled people</p>
Suppliers and contractors	<p>Focus: Risks and opportunities for e-Boks ability to deliver on its ESG commitments in the supply chain</p> <p>Structured input: Supplier and contractor due diligence processes during selection, annual questionnaires, supplier audits and assurance processes</p>

Key ESG focus areas



Environmental

- CO2e emissions
- Energy consumption
- Water consumption
- Materials consumption
- Land and biodiversity



Social

- Users' access to a secure digital mailbox
- Employee wellbeing, development and rights
- Protection of Human Rights



Governance

- Anchoring of ESG
- Embedding of e-Boks code of business conduct
- Compliance with data security standards and regulation
- Anti-corruption
- Responsible supply chain management

e-Boks commitment to the 2030 Agenda



SDG 12: Responsible consumption and production

e-Boks targets SDG 12.2.1, working to reduce the material footprint per capita and per GDP by accelerating the transition from paper-based to digital post. By 2030, our target is to enable 1.5 billion digital documents to be sent annually.



SDG 13: Climate action

e-Boks works to reduce our own CO2e footprint in scope 1 and 2, while also mapping how we can reduce our CO2e footprint in scope 3.



SDG 16: Peace, justice and strong institutions

e-Boks works to ensure that every time we open one million digital postboxes, we also strengthen one million people's legal rights, protect their fundamental freedoms, secure their legal identities, and enable their secure and transparent access to public and private institutions. Our 2030 ambition is to grow our number of users to 30 million.



Communication on Progress

Integration of the UN Global Compact Ten Principles



Human Rights



Labour



Environment



Anti-Corruption

UN Global Compact Ten Principles

e-Boks policies and guidelines

In this report

Human Rights



1	Businesses should support and respect the protection of internationally proclaimed human rights	<ul style="list-style-type: none">e-Boks Code of Business ConductInformation security and data privacy policyAcceptable use policy (Information Assets)Supplier Management Policy, Procurement process and Procurement checklist (specific to information / data security)ISO27001 (specific for information / data security)	Page 11 Page 21-23 Page 25-27
2	Businesses should make sure that they are not complicit in human rights abuses		Page 11 Page 21-23 Page 25-27

Labour Rights



3	Business should uphold the freedom of association and the effective recognition of the right to collective bargaining	<ul style="list-style-type: none">labour code of conduct	Page 21-23 Page 25-27
4	Business should uphold the elimination of all forms of forced and compulsory labour		Page 21-23 Page 25-27
5	Business should uphold the effective abolition of child labour		Page 21-23 Page 25-27
6	Business should uphold the elimination of discrimination in respect of employment and occupation		Page 11 Page 25-27

Environment



7	Businesses should support a precautionary approach to environmental challenges	<ul style="list-style-type: none">e-Boks code of business conductCOP report and commitment	Page 11 Page 17-19 Page 25-27
8	Businesses should undertake initiatives to promote greater environmental responsibility		Page 11 Page 17-19 Page 25-27
9	Businesses should encourage the development and diffusion of environmentally friendly technologies		Page 11 Page 17-19

Anti-Corruption



10	Businesses should work against corruption in all forms, including extortion and bribery	<ul style="list-style-type: none">e-Boks code of business conduct	Page 11 Page 25-27
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Our environmental responsibility: Contributing to a greener world

e-Boks environmental responsibility focuses on reducing our environmental footprint in our operations, as well as on the environmental benefits associated with digital post services. e-Boks has set out to map and measure our CO₂e emissions in scope 1 and 2 as a first step towards understanding our impact on the climate, and what actions we might take to reduce it. Recognizing that most of our emissions lie outside of our direct operations, mainly related to our supply chain, we have also taken the first steps mapping our focus areas in Scope 3. This includes data centers, which according to the International Energy Agency will consume 1/5 of the world's power supply by 2025. e-Boks is committed to contributing to SDG 12: Reducing the material footprint per capita by enabling the transition from paper-based to digital document handling.

e-Boks is committed to protecting the environment by delivering on SDG 12

As a digital platform and solutions provider, e-Boks is committed to delivering on UN Sustainable Development Goal 12: Responsible Consumption and Production. Targeting SDG 12.2.1: Reduce the material footprint per capita and per GDP, we have set an ambition of enabling 1.5 billion digital documents to be sent by 2030. This number includes digital documents sent from e-Boks' own platforms as well as 'white-label' platforms, driven by third parties. In 2021 we reached 744 million digital documents, which is the equivalent of 12,283 tons of paper saved, 4.3 billion litres of water usage saved, and 8,858 tons of CO₂e saved.

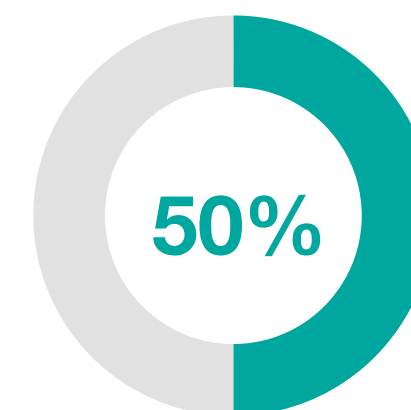
Note: In our 2021 CoP report we apply an updated assessment for CO₂e saved per digital document sent based on PostNord data.



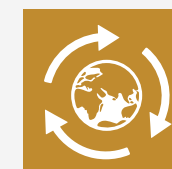
Digital documents

Target: 1.5 billion documents
sent annually by 2030

Progress: 744 million documents
sent in 2021



e-Boks is committed to protecting the environment by delivering on SDG 12

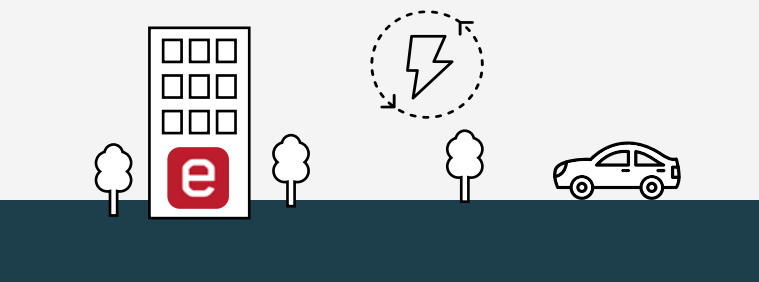


Target 12.2.1

Contributing to reducing the material footprint per capita and per GDP

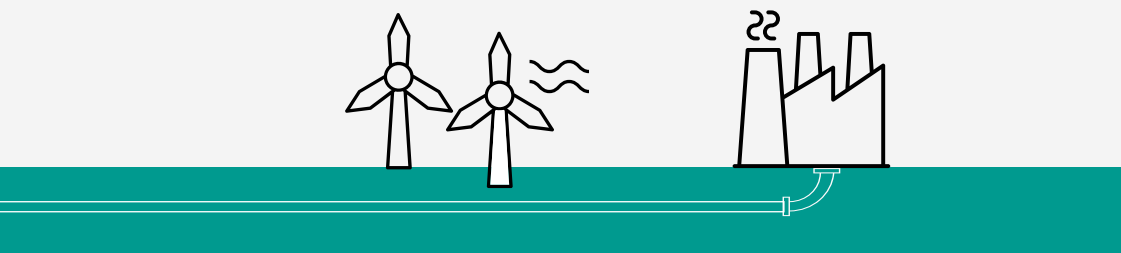
Reducing our CO2e footprint

Urgent action is needed to reduce the global carbon footprint to keep temperatures from rising above 1.5°C. This requires the world to reach net-zero emissions no later than 2050 and halve emissions by 2030. While the large emitters are key to deliver on this ambition, every single action counts. At e-Boks, we have taken the first steps of identifying our corporate CO2e emissions with a view to identifying actions to reduce our direct and indirect impacts. In the coming year, we will explore ideas to how we can contribute to lower our direct company emissions in Scope 1, but more importantly, also how we can be a catalyst for change in our supply chain and among our partners in scope 3.



Scope 1 Direct company emissions (15.7 tons CO2e in 2021)

- Company vehicles



Scope 2 Indirect company emissions (14,7 tons CO2e in 2021)

- Purchased district heating
- Electricity used in company facilities



Scope 3 CO2e emissions from the corporate value chain

Upstream activities

- Purchased goods and services
- Employee commuting
- Business travel and accommodation
- Leased assets
- Electricity consumption in data centers
- Purchased IT equipment (computers and screens)

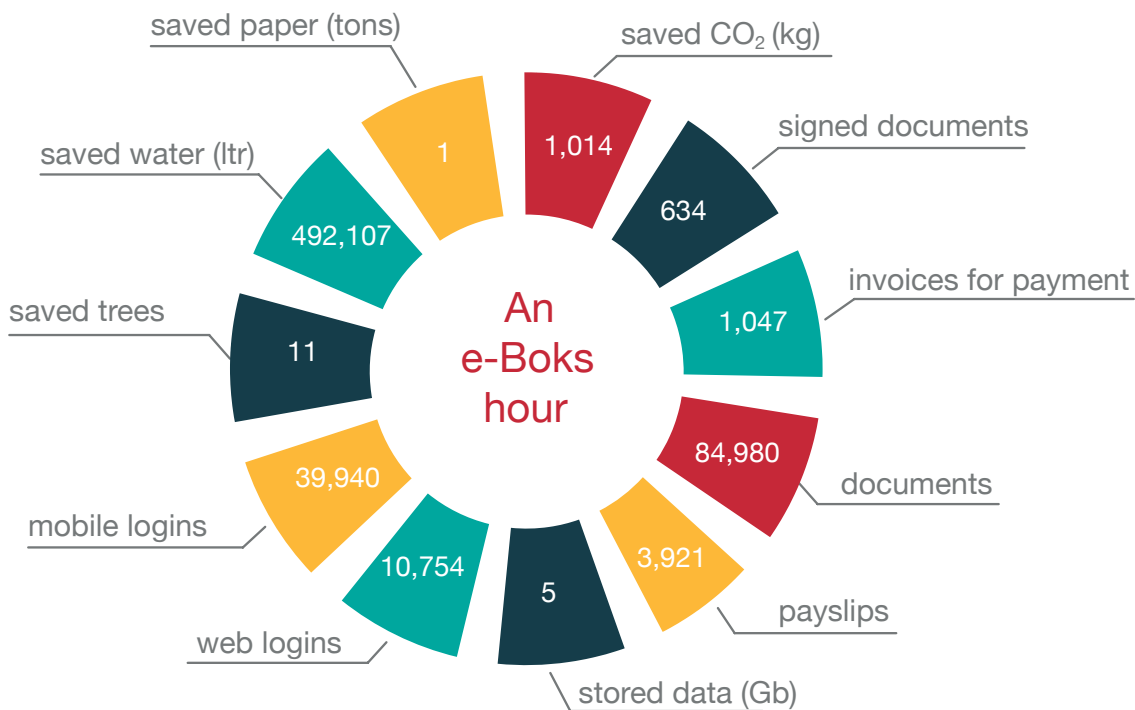
Downstream activities

- Electricity consumption when using e-Boks applications
- Electricity consumption in data centers (white label solutions managed by partners)
- Saved CO2e from digital post

Paperless communication helps the environment

According to the WWF, the paper and pulp industry consumes 33-40% of all the wood used by manufacturers worldwide and is one of the most water consuming industries on the planet. According to the International Energy Agency, the paper and pulp industry is also one of the most energy intensive sectors, accounting for 6% of the total industrial energy consumption. Converting from paper-based to digital and paperless distribution, signing and filing of documents offers not only opportunities for increased efficiencies, but also for reducing negative environmental impacts like natural resource consumption, pollution, and waste. Reducing the use of paper saves trees and conserves energy for production and transportation and limits waste to landfill. It also

enables remote access to documents and limits the physical space needed for file keeping. Under EU Taxonomy regulation, investors and companies need to disclose the environmental performance of the activities they invest in. e-Boks has over the past years provided a special service to our larger clients, tracking their e-Boks performance on the reduction of the material footprint on trees, water, and CO2 as part of our quarterly reporting. We have developed a communications tool 'An e-Boks hour' that visualizes the correlation between user logins, the number of paperless documents and water, trees and CO2 emissions saved.



Towards carbon neutral data

As part of EU's Shaping Europe's digital future initiative, a study was published in 2022 on Greening Cloud Computing and Electronic Communications Services and Networks: Towards Climate Neutrality by 2050. According to this report, data centres accounted for 2.7% of the EU's energy consumption in 2018, and left unchecked, could rise to 3.2% by 2030. The report recommends a number of instruments for further greening data centers, incl. green public procurement requirements for data centers and a data centre registry where energy consumption and material use are transparently communicated. This is something e-Boks fully welcomes as it will allow us to track the environmental performance among existing and future data center and cloud computing providers more accurately, and through that push behind the transition. e-Boks has set the ambition of striving towards procuring 100% climate neutral data by 2030 from our Danish data provider. This is highly achievable in Northern Europe where data centres are leading the green transition. This includes KMD that provides e-Boks' national data centre, which is powered by wind. In 2020, KMD reached its ambition of net-zero energy consumption, among other things by sourcing their energy through Ørsted's offshore

windmill farm Horns Rev 2, and through certificates of origin on renewable energy from Norwegian hydropower. As we grow our business outside of Europe, we hope that we can play a catalytic role in greening the data sector. We are helped by a general trend among major global data centre and cloud providers such as Amazon Web Services (AWS) that hosts our white-label solution in Bahrain. AWS has committed to powering its operations with 100% renewable energy by 2025 and strives for carbon neutrality by 2040. We also welcome data centres' growing focus on water stewardship, not least in regions with water scarcity.

Biodiversity and land use

As part of our commitment to contributing to a greener world, e-Boks has partnered with Trees for the Future.org. Towards 2030, we committed to annually plant 10,000 trees, resulting in a total of 120,000 trees planted by 2030. To date, 30,000 trees have been planted, supporting the vision of Trees for the Future of creating forest gardens that can provide for smallholder farmers. By moving from paper-based to digital communication, and by greening the data sector, we can contribute to protecting nature and reverse the degradation of our ecosystems 🌱



Our social responsibility

Contributing to better digital societies

e-Boks social responsibility focuses on our millions of users, but just as importantly on our employees and contractors, as well as the people working in our supply chain. Through our secure digital postboxes, we focus on strengthening people's legal rights, protecting their fundamental freedoms, securing their legal identities, and enabling their secure and transparent access to public and private institutions. This is how e-Boks delivers on our corporate purpose of contributing to better digital societies, and how we support SDG 16: Peace, justice and strong institutions.

Growing our business with purpose

e-Boks provides secure platforms and digital postboxes to public authorities and businesses in Denmark, Sweden, Norway, Greenland and Ireland. Our strategy is to build and grow our business worldwide in countries and among businesses that

share our ambition of building better digital societies with citizens at the center. In particular, e-Boks is focused on being a catalyst for secure digital infrastructures in countries with a desire to strengthen the public and private communication with their citizens.

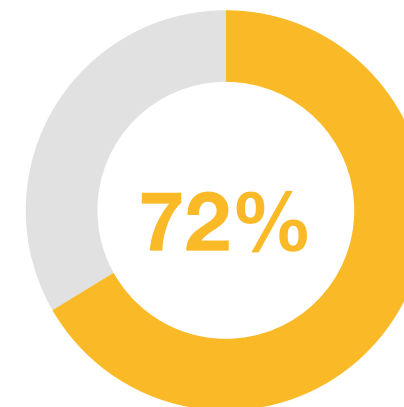
e-Boks is committed to building and maintaining our business in support of SDG 16

As a digital platform and solutions provider, e-Boks is committed to delivering on SDG 16: Peace, Justice and Strong Institutions. We work to ensure that every time we open one million digital postboxes, we also strengthen one million people's legal rights, protect their fundamental freedoms, secure their legal identities, and enable their secure and transparent access to public and private institutions. Our 2030 ambition is to grow our number of users to 30 million. In 2021, we reached 21.7 million users, which is 3.7 million more users since we set our baseline in 2019. With our strategy to grow our business within and outside Europe, we remain confident that we are on track to reach our ambition.



e-Boks users

Target: 30 million users by 2030
Progress: 21.7 million users in 2021



e-Boks is committed to building and maintaining our business in support of SDG 16



Target 16.3

Promote the rule of law at the national and international levels and ensure equal access to justice for all



Target 16.6

Develop effective, accountable and transparent institutions at all levels



Target 16.9

By 2030, provide legal identity for all, including birth registration



Target 16.10

Ensure public access to information and protect fundamental freedoms

In 2021, e-Boks further consolidated the partnership with the Bahrain Telecommunications Agency Batelco, entered into in late 2020. In early 2022, the Batelco subsidiary Beyon Connect was launched. In cooperation with e-Boks, the initial focus of Beyon Connect has been to develop and roll out OneBox and OneID; a secure digital postbox and secure digital ID to Bahrain and the wider Middle East region. OneBox and OneID will live up to the same high standards for data privacy, personal data protection, and security as e-Boks maintains in Europe and will be monitored accordingly. By partnering with Beyon Connect, e-Boks will facilitate the significant potential for digitalization in the region.

An inclusive and diverse workplace

e-Boks seeks to cultivate an inclusive and diverse workplace where everyone can be themselves. Among our 85 employees, we have a good spread across age groups and welcome a growing diversity of nationalities on our team. Gender diversity could be further improved and is an ongoing challenge in a male dominated sector. Across the entire e-Boks team, we have 24% women and 76% men. e-Boks is working with higher educations to encourage more non-male IT professionals and works to ensure equal opportunities in our hiring, promotion, and remuneration processes. e-Boks offers its employees parental leave in accordance with Danish Law. In the annual Great Place to Work survey, 97% of employees highlight that people feel valued for who they are, no matter their gender, sexual orientation, or ethnicity.

People development

In 2021, e-Boks introduced a highly individualized dialogue-based approach to people development focusing on employee well-being, development, and performance. It employs a conversation tool that allows for ongoing – and a minimum of 4 – confidential dialogues a year between employee and manager. Mandatory development plans for all employees are filled out during the dialogues. Through the e-Boks HR system Empl, both manager and employee can access the individual development plans and make ongoing updates and input. It is the manager's responsibility to initiate the dialogues and to ensure that the development plans both align with company strategy and the individual needs of the employee. It is the employee's co-responsibility to bring up important issues and suggest relevant ideas for personal development opportunities.

Employee health and wellbeing

e-Boks conducted a workplace health and safety assessment in the first months of 2022. The previous assessment was conducted in 2018. The assessment was overseen by an employee-elected working environment representative together with an e-Boks working environment manager. To respect the privacy of the respondents, all answers were anonymized. Results and findings are shared with senior management and attention areas were agreed upon. There was a 78% response rate in the 2022 survey.

Overall, the e-Boks team, even after two years of COVID-19 lockdown, remains engaged and motivated. The statement: "I am experiencing a mentally and emotionally healthy working environment" receives an average rating of 3.96 on a five-point scale, and the physical setting for people's working environment is also satisfactory. We can improve on indoor air quality and lighting, which are common issues in an open office space. Work-related sickness and stress are attention areas, with close to half of all employees having experienced some level of stress within the past 12 months, but not all bringing it up with their line managers. e-Boks is using the feedback from the workplace health and safety assessment to encourage an open and safe environment for people to talk about stress, and to seek help from their managers when stress and other issues impact their work.

Another attention area for e-Boks, is our zero-tolerance policy for any type of harassment or bullying in the workplace. To maintain our focus on this area, e-Boks is developing a plan of action for handling such issues, including the opportunity to report such incidents anonymously.

Human and labour rights

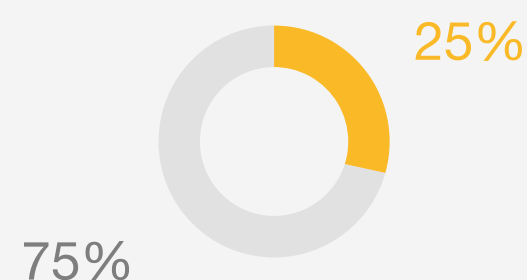
As a signatory to the UN Global Compact, e-Boks is committed to conforming to all aspects of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. e-Boks respects and abides by local labour law and supports freedom of association. Respect for human and labour rights is also a key parameter in the company's screening and qualification of suppliers and contractors. e-Boks conducts due diligence processes when sourcing for suppliers and contractors and employs a non-tolerance for child labour and forced labour. As e-Boks expands its business into other regions, including the Middle East and lately contracting with a sourcing partner in India this is a focus area.

As the company grows and expands, in 2022, e-Boks took steps to develop a dedicated [Labour Code of Conduct](#) that applies to all employees and sets clear standards and expectations to working at e-Boks.

Employee diversity

Gender diversity in senior management (including board members)

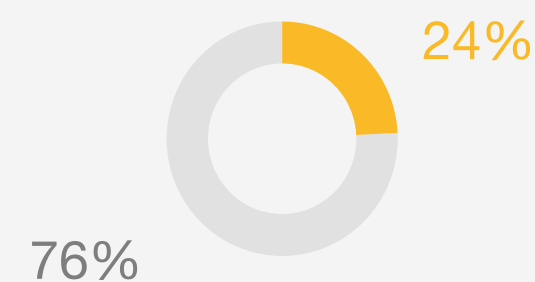
Men: 9 (75%)
Women: 3 (25%)



5
years in a row
Great Place To
Work Certified™

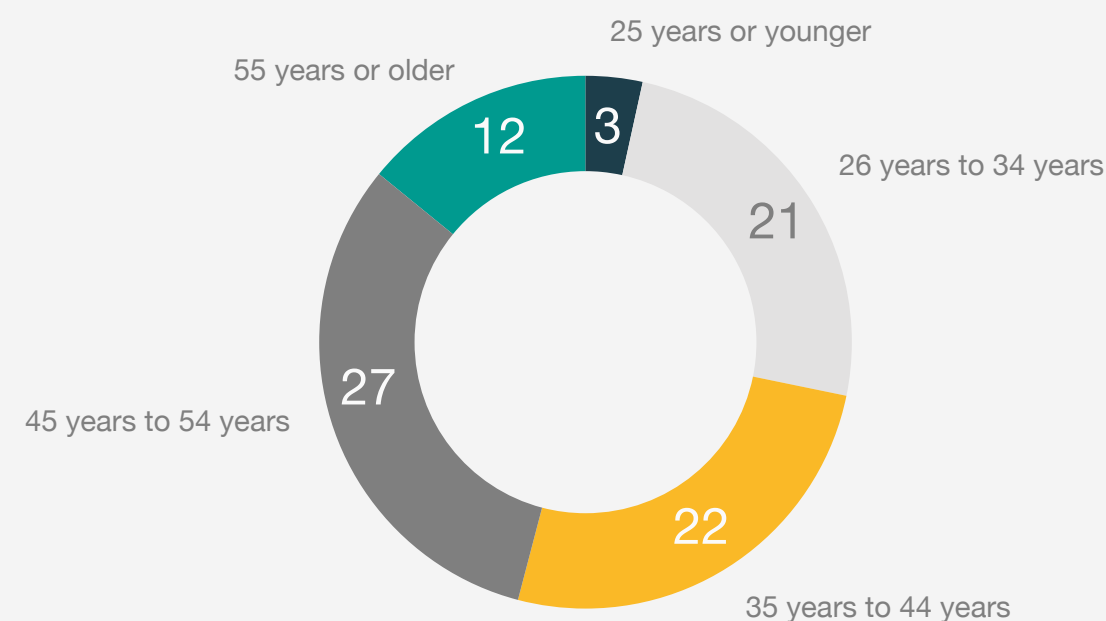
Gender diversity among all employees

Men: 66 (76%)
Women: 21 (24%)



85
number of
employees in 2021

8
nationalities represented
amongst our employees
in 2021





Our governance responsibility: Maintaining and building trust

e-Boks plays a trusted role in society by ensuring the continuous reliability, stability, and security of our digital platforms. As e-Boks treats and stores information of great importance to citizens, authorities and companies, our clients and users need to be able to trust that they can access their digital postbox whenever they want, and that all their data is kept private, confidential, and secure at all times. This is at the heart of our governance commitment.

In 2021, more than 21 million citizens across the world used a secure digital postbox delivered by e-Boks to access, sign, and store critical documents from more than 30,000 public and private institutions – banks, insurance and pension funds, and utility companies. During the past few years, the COVID pandemic has shown us just how important a stable and efficient digital infrastructure is for societies across the world. In 2021, the number of documents distributed via e-Boks reached 744 million and thereby increased with 22%, after another all-time high year.

Corporate governance

e-Boks is an independent limited company established in 2001. It is co-owned 50/50 by Nets and PostNord. Nets is a European leading provider of secure digital payment systems, and PostNord is the leading Nordic provider of parcel and logistic services. The e-Boks Board of Directors includes two members from each of Nets and PostNord.

Our sustainable value creation is embedded in our corporate strategy and business plan, and therefore anchored and overseen by the [e-Boks Executive Leadership Team \(ELT\)](#). The ELT works to balance the legitimate interests and expectations of all stakeholders in its decision-making, by drawing on e-Boks values and standards described in our e-Boks code of business conduct. The ELT works to ensure that the e-Boks culture enshrines those values and standards on a day-to-day basis.

In 2022, e-Boks launched a dedicated [labour code of conduct](#) to make our commitments and expectations clear to everyone, which we believe is especially important as we expand and globalize our business. Among other things, our labour code of conduct encourages a “speak-up culture” where human rights and labour code of conduct non-compliance dilemmas are voiced and handled.

IT security governance

At e-Boks, we believe that achieving excellence in IT security and data privacy is the foundation for our license to operate and our most material stakeholder risk. Security governance is at the heart of our ability to protect human rights, including the right to privacy and the ability for individuals to make choices about how and with whom they share confidential information about themselves. When using the e-Boks platform, all communication happens via secure, encrypted data channels in accordance with the EU General Data Protection Regulation (GDPR).

e-Boks code of business conduct

Employees as well as business partners and suppliers comply to the [e-Boks code of business conduct](#).

The code of conduct covers:



Legal compliance and human rights



Labour standards
incl. freedom of association, forced labour, child labour, non-discrimination and employment conditions



Health and safety



Anti-corruption
incl. prohibited business practice
incl. gifts, hospitality and expenses,
money laundering, and breach of competition laws



Environment



Non-compliance and corrective action



Confidential information

Security is integral at all stages, from strategic planning to operational execution. We work to be ahead of the curve when anticipating future security risks and requirements through stakeholder dialogue, intelligence gathering, and early warning systems. The e-Boks security governance model and Information Security Management System (ISMS) is based on ISO 27001:2013. Our overarching Information Security and Data Privacy Policy addresses the critical importance of security and compliance with the EU General Data Protection Regulation (GDPR) and ISO 27701 in all aspects of the business. The Information Security and Data Privacy Policy also describes and supports the functional areas and their security work, which include roles, responsibility, and accountability for the security personnel and the Security Board representing all areas of the organisation. The Security Board is accountable for security and compliance in e-Boks, which ensures that all decisions and solutions have security at its core by incorporating the Defence in Depth principle and Privacy by Design.

The Information Security and Data Privacy Policy is part of our Employee Handbook and is mandatory reading for all employees. In addition, we provide mandatory education and awareness training on a regular basis. Among other things, we have introduced a nanolearning system, where all employees are kept up to date on topics such as digital privacy, security, and compliance. Training comprises regular quizzes and questionnaires from both the Security and Compliance team building on the concept of STAR – Stop, Think, Ask, React.

Responsible supply chain
Contractor and supplier selection is subject to a procurement process, which includes a checklist that enables us to

conduct due care and due diligence in a structured process that encompasses our e-Boks code of business conduct and high security standards. In 2021, e-Boks chose ValueLabs in Hyderabad India as our sourcing partner. ValueLabs are ISO 27001 certified, recognized as a good place to work, and a champion for gender diversity. Among our key suppliers are data centres and cloud partners such as KMD and NordCloud, which both are ISO 27001 certified.

Our contract templates include our code of conduct, and we take a risk-based approach to conducting supplier and contractor audits with a view to understanding risks and opportunities for continuous improvements and staying in compliance.

Audits and assurance
e-Boks prepares an annual audit and assurance schedule covering internal and external audits. In 2021, 56 suppliers were covered ranked in categories of high, medium, and low risk. Data centres are categorized as high risk from an IT security perspective, and here we conduct annual audits, including data centre inspections, user attestations, and testing of effective security controls, while simultaneously following up on previous audits to ensure proper security measures are addressed.

PwC conducts assurance of e-Boks overall IT security and compliance, including third-party assurance of our data centre providers. The 2021 PwC management letter stated that e-Boks has a high degree of IT security and controls in place with no exceptions noted in the way e-Boks demonstrates leadership commitment, plans, supports, operates, evaluates performance and makes continuous improvements in compliance with its ISO 27001:2013 information security management system.

Whistleblower

In 2020, e-Boks introduced an anonymous whistleblowing function, enabling both internal and external stakeholders to report suspected violations of our code of conduct. All cases are handled confidentially by our Legal and Compliance team. During 2021, e-Boks received no reports. The Legal and Compliance team have started initiatives to ensure that awareness of the function is not the reason for the lack of reporting. e-Boks wants to ensure confidence, integrity, and anonymity of the function is known to ensure that it does not hinder any potential reporting.

Non-compliance

All end-user complaints and non-compliance with the code of conduct are handled by our Legal and Compliance team. e-Boks takes appropriate action, described in our labour code of conduct, when non-compliance occurs. Management action is dependent on the severity of the non-compliance, including whether it was an issue of accidental human error, negligence, or a deliberate – and worst case unlawful – breach. Action taken ranges from capturing and learning from mistakes for continuous improvements, to verbal and written warnings to dismissal and legal action. e-Boks cultivates a speak up culture, where we learn from our mistakes.

Accountability

e-Boks is committed to being accountable and transparent towards our stakeholders. We communicate on progress to the UN Global Compact on our implementation of the UN Global Compact Ten Principles and our progress in delivering on SDG 12, 13 and 16. As part of our UN Global Compact CoP reporting, we also disclose end-user complaints received through the Danish Data Protection Agency as well as any confirmed whistleblower reports and serious code of conduct non-compliance. In 2021, we had 6 end-user complaints, no whistleblower reports, and no serious code of conduct non-compliance.

For the 2021 CoP report, we have also introduced the GRI 2016 framework (p 28) and the Carbon Disclosure Project scoping model (p 18), which will guide our reporting going forward

IT security governance responsibilities

<p>Chief Executive Officer (CEO)</p> <p>The CEO is responsible for the overall management, direction and security of e-Boks information assets</p>	<p>Chief Security Officer</p> <p>The CSO has the delegated authority and is responsible for planning, developing, and deploying e-Boks’ Security Program</p>	<p>Security Board</p> <p>This board is responsible for overseeing security initiatives, policies, and processes</p>	<p>Security Forums</p> <p>These forums are responsible for the evaluation and implementation of security initiatives, policies, and processes</p>
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GRI context index



GRI Standard	Disclosures	Omission	Page number	Relevant SDG	Comments
General disclosures					
GRI 102					
102-1	Name of the organisation		1		
102-2	Activities, brands, products and services		6-7		
102-3	Location of headquarters		6		
102-4	Location of operations		6		
102-5	Ownership and legal form		6, 25		
102-6	Markets served		6		
102-7	Scale of the organisation		6		
102-8	Information on employees and other workers		22-23		
102-9	Supply chain		11, 12, 13, 26, 27		
102-10	Significant changes to the organization and its supply chain				No major changes in 2021
102-11	Precautionary principle or approach		11, 12, 13, 15, 25, 26, 27		e-Boks code of business conduct
102-12	External initiatives		11, 12		
102-13	Membership of associations		12		
102-14	Statement from decision-maker		2		
102-16	Values, principles, standards, and norms of behaviour		8, 9, 11, 15, 25, 26, 27		
102-18	Governance structure		6, 26		
102-40	List of stakeholder groups		12		
102-41	Collective bargaining agreements		22		Labour code of conduct


GRI Standard	Disclosures	Omission	Page number	Relevant SDG	Comments
102-42	Identifying and selecting stakeholders		12		
102-43	Approach to stakeholder engagement		12		
102-44	Key topics and concerns raised		12, 13		
102-45	Entities included in the consolidated financial statements		Annual Report		
102-46	Defining report content and topic boundaries		4, 5		
102-47	List of material topics		12		
102-48	Restatement of information		17, 32, 33		A new calculation method has been used to measure CO2e saved per digital document, based on new and updated data received from PostNord (which has transitioned to Hybrid vehicles)
102-49	Changes in reporting		5, 11, 18		e-Boks has changed to ESG reporting, for the first time working in alignment with the GRI 2016 reporting standard as well as the Carbon Disclosure Project
102-50	Reporting period		1, 4		
102-51	Date of most recent report		1, 4		23 April 2022
102-52	Reporting cycle		1, 4		Fiscal year
102-53	Contact point for questions regarding the report				Susanne Søndahl Wolff, Director of Communications and CSR, ssw@e-boks.dk
102-54	Claims of reporting in accordance with the GRI Standards		4		This is e-Boks first attempt at reporting in accordance with GRI standards and has been prepared in alignment with the GRI Standards Core Option
102-55	GRI content index		28, 29		


GRI Standard	Disclosures	Omission	Page number	Relevant SDG	Comments
Material topics					
Data privacy GRI 103: Management approach 2016					
103-1	Explanation of the material topic and its boundary		25, 26, 27	SDG 16	
103-2	The management approach and its components		25, 26, 27	SDG 16	
103-3	Evaluation of the management approach		25, 26, 27, 32, 33	SDG 16	PWC assurance of IT security and compliance also covering suppliers
Business ethics					
GRI 103: Management approach 2016					
103-1	Explanation of the material topic and its boundary		11, 15, 25, 26, 27		e-Boks code of business conduct
103-2	The management approach and its components		11, 15, 25, 26, 27		e-Boks code of business conduct
103-3	Evaluation of the management approach		11, 25, 26, 27, 32, 33		
GRI 205: Anti-corruption 2016					
205-1	Operations assessed for risks related to corruption		17, 18, 19		
205-2	Communication and training about anti-corruption policies and procedures		17, 18, 19		
205-3	Confirmed incidents of corruption and actions taken		32, 33		No incidents in reporting period


GRI Standard	Disclosures	Omission	Page number	Relevant SDG	Comments
Climate change					
GRI 103: Management approach 2016					
103-1	Explanation of the material topic and its boundary		17, 18, 19	SDG 13	
103-2	The management approach and its components		17, 18, 19	SDG 13	
103-3	Evaluation of the management approach		18, 32, 33	SDG 13	e-Boks has set a base-line for Scope 1 and Scope 2 in 2021, and will assess Scope 3 emissions and set targets in 2022
GRI 305: Emissions 2016					
301-1	Direct (Scope 1) GHG emissions		18	SDG 13	
301-2	Energy indirect (Scope 2) GHG emissions		18	SDG 13	
301-3	Other indirect (Scope 3) GHG emissions	Assessment pending	18	SDG 13	
301-5	Reduction of GHG emissions	2021 baseline for Scope 1 and 2 established	18	SDG 13	e-Boks has set a base-line for Scope 1 and Scope 2 in 2021, and will assess Scope 3 emissions and set targets in 2022
Reduce material footprint per capita per GDP					
GRI 103: Management approach 2016					
103-1	Explanation of the material topic and its boundary		17, 19	SDG 12	e-Boks measures down-stream upsides from moving from paper-based to digital communication
103-2	The management approach and its components		17, 19	SDG 12	
103-3	Evaluation of the management approach		17, 19, 32, 33	SDG 12	

ESG dashboard



 Environment	2019 status	2020 number	2021 number	2030 target
Number of documents sent yearly	513 million	610 million	744 million	1.5 billion
Tons of paper saved yearly	8,464 tons	10,065 tons	12,283 tons	24,750 tons
Liters of water saved yearly	3 billion liters	3.5 billion liters	4.3 billion liters	8.6 billion liters
Tons of CO2e saved yearly	18,468 tons	21,953 tons	8,858 tons*	54,000 tons**
Trees planted total	10,000	20,000	30,000	120,000

 Social	2019 status	2020 number	2021 number	2030 target
e-Boks users	18 million	20 million	21.7 million	30 million
Share of Danish population using e-Boks	90 pct	90 pct	90 pct	NO
Share of men and women in senior management	25% women / 75% men	25% women / 75% men	25% women / 75% men	NO
Share of men and women amongst all employees	28% women/ 72% men	25% women/ 75% men	24% women 76% men	NO
Number of employees	93	99	87	NO
Our office facilities contribute to a good working environment	78%	85%	81%	NO
This is a psychologically and emotionally healthy place to work	82%	78%	74%	NO
This is a physically safe place to work	99%	95%	97%	NO
People care about each other here	91%	91%	88%	NO

 Governance	2019 status	2020 number	2021 number	2030 target
Growth in revenue	7.7 %	15%	8.42%	NO
100% of our employees know and understand our Information Security Policy	green	green	green	NO
We have a high level of security, rated by PwC	green	green	green	NO
100% of our employees know and understand e-Boks code of business conduct	green	green	green	NO
Through our supplier contracts, all significant suppliers agree to adhere to e-Boks code of business conduct	Green	Green	Green	NO
Number of end user complaints to the Danish Data Protection Agency:	No information	5	6	NO

* This number is lower in 2021 than in 2020 due to an update in how the CO2e is calculated. The CO2e is calculated in relation to PostNord's emissions, who have succeeded in lowering their emissions significantly. We also note that this number does not include CO2e emissions on the user end, e.g., when documents are opened and read.

** This number was based on the assessment made in our CoP report from 2019. Due to the above mentioned change in the calculation method, we expect to revisit this number in our 2022 report.

Sources

Our environmental responsibility, page 17-19



Data centres will according to the International Energy Agency (IEA) consume 1/5 of the world's power supply by 2025.

Source: [IEA – Data Centres and Data Transmission Networks – More efforts need, Tracking report November 2021](#)

Data centres accounted for 2.7% of the EU's energy consumption in 2018, and left unchecked, could rise to 3.2% by 2030.

Source: [European Commission: Energy-efficient Cloud Computing Technologies and Policies for an Eco-friendly Cloud Market, Report publication 09 November 2020](#)

The paper and pulp industry consumes 33-40% of all the wood used by manufacturers worldwide and is one of the most water consuming industries on the planet.

Source: [WWF communication on responsible forestry: Pulp and paper, last visited 22nd April 2022](#)

KMD, e-Boks national data centre provider, has committed to net-zero emissions from own activities.

Source: [KMD Sustainability Report 2020](#)

Amazon Web Services (AWS) that hosts e-Boks white-label solution in Bahrain has committed to powering its operations with 100% renewable energy by 2025 and strives for carbon neutrality by 2040.

Source: [Amazon Sustainability last visited 22nd April 2022](#)

Trees for the Future create forest gardens that can provide for smallholder farmers.

Source: [Trees for the Future last visited 22nd April 2022](#)

Data sources, page 17

Use of water in paper production

Source: [Unesco, Water Civilization International Center, Venice](#)

Use of trees in paper production:

Source: [Department of Geosciences and Natural Ressource Management, Copenhagen University](#)

CO2e saved from digital post:

Source: [PostNord environmental calculator](#)

Social responsibility, page 20-23



The E-Boks partner Beyon Connect, an affiliate to Batelco, will rollout secure postbox and secure ID to Bahrain and beyond.

Source: [Batelco communication last visited 22nd April 2022](#)

Governance responsibility, page 24-27



ValueLabs is ISO 27001 certified, recognized as a good place to work, and a champion for gender diversity

Source: [ValueLabs communication last visited 22nd April 2022](#)

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This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

eBoks

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