

ESG Questionnaire

November 2024



ESG Questionnaire

Questions		Answers	
General Industry	Please list the industry's three biggest sustainability (ESG)-related challenges and briefly describe the process for identifying these challenges	Challenge #1	Social responsibility: Attracting and retaining talent by creating welcoming workplaces with diversity and inclusion initiatives, equal salaries and transparent communication. Responsible gaming: providing a safe and positive gaming experience for consumers.
		Challenge #2	Privacy, integrity and security of consumers: protection against data leakages and security threats. The industry needs to be compliant with GDPR and other applicable data protection and privacy regulations and manage these topics with high standards.
		Challenge #3	Climate change: Collect, report and decrease carbon emissions. To a large extent the video games industry hold a majority of energy emissions in scope 3, emissions deriving from from player usage.
	Have you conducted any preliminary assessments of your company in relation to the EU Taxonomy? If so, what was the outcome?	Stillfront is in scope for the taxonomy since 2021. By screening its business activities, Stillfront has concluded its activities as developer and publisher of games, not being covered by the Climate Delegated Act and consequently Taxonomy-non-eligible. Stillfront is also in scope for the upcoming Corporate Sustainability Reporting Directive, CSRD, effective from 2025.	



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E Environment	Please list the firm's three primary risks related to climate change and if any, the firm's climate-related opportunities	Risk #1	1) Increased demand for, and shortages of, electricity. Stillfront's value chain is dependent on a global digital environment.
		Risk #2	2) Climate change could lead to increased costs for Stillfront for example through the increased need for office and server cooling as a result of more frequent heat waves and increased temperature over time.
		Climate-related opportunities	Playing digital games is an energy efficient hobby, impacting the planet very little in terms of emissions. Climate related opportunities for Stillfront include increased level of renewable energy in Stillfront's office premises, further optimized data servers and hosting services as well as "green coding".
	Does the firm anticipate any climate-related investments, and if so to what extent?	Identified investments mainly relate to increase the levels of renewable energy in Stillfront's office premises as well as further increasing renewable energy for data centres and hosting services.	
	Circular Economy: how are purchases and waste managed? If the firm rely on any scarce resources, please describe what efforts are made to mitigate the risk of those resources becoming scarcer in the future, e.g. recycling, reusing substitutes or improved resource efficiency?	Stillfront has an impact on resource use, both in the upstream value chain where the electronic devices and office materials used by Stillfront employees are produced, as well as in the downstream value chain where gamers rely on electronic hardware. The production of hardware involves mining and extraction of raw materials such as metals and rare earth elements. This impact resource flows and use of resources. In addition, gaming hardware, primarily mobile devices for Stillfront, usually has a short product life. The productivity gains is constantly increasing in the digital economy. Standardized game engines are used for multiple games and the games have long lifecycles for large audiences. Artificial intelligence, AI, has further increased productivity and technology gains, by the efficient creation of graphics and content. Stillfront and its subsidiaries strive to minimize use of material that may cause environmental damage and reduce waste generation. Stillfront maintains a waste diversion for its operations through a combination of waste reduction, reusing and responsible recycling.	



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E Environment <i>(continued)</i>	Transition-related risks (for example changed customer preferences or legislation): Do you anticipate any risks or opportunities due to the transition to a carbon-neutral society? Is there any risk of the firm's offer being negatively affected? If yes, how has the firm positioned itself to handle that risk?	We don't see any business risks with our society becoming carbon-neutral. On the contrary, our value chain is digital and has a low-carbon footprint compared to many other hobbies. Stillfront's largest negative environmental impact derives from the emissions of our gamers when playing our games on mobile or browser devices. This also means that we are limited in how much we can impact these emissions, which could be seen as a risk.
	Have you set a target to become carbon neutral? If so, how have you defined carbon neutrality?	Stillfront has set near-term company-wide emission reduction targets in line with with the Science Based Targets initiative (SBTi). Proposed reduction targets are in line with the Paris agreement and the 1.5-degree goal. Near-term targets are: Stillfront commits to reduce absolute scope 1 and 2 GHG emissions 42% by 2030 from a 2022 base year. Stillfront also commits to reduce scope 3 GHG emissions 51.6% per SEK value added within the same timeframe.



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		Questions	Answers		
E Environment <i>(continued)</i>	Please list the firm's (1-2) primary means of making a positive environmental impact or minimizing negative environmental impact. Please list the corresponding most relevant UN Sustainable Development Goals. What proportion of sales can be directly linked to selected UN SDGs?	Mean #1	Stillfront's reduction plan include reduction of 1, 2 and 3 emissions. Stillfront has therefore set Science Based Targets. By having an active and dedicated climate strategy Stillfront can do its share to mitigate the effects of climate change. Stillfront has developed a reduction plan which identifies the biggest emission sources and how we will tackle them.	Corresponding SDG	Goal 13 is Climate action. To tackle climate change, nations and companies globally need to work together towards the goals set in the Paris Agreement.
		Proportion of sales directly linked to selected UN SDGs	Stillfront does not measure sales in correlation to the UN SDGs.		



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S Social	Does the firm have a history of accidents? If so, how have these been managed? Are there any preventive measures, such as policies?	Stillfront does not have a history of accidents. Our employees are working from an office or home office where neither is prone to accidents. Employee satisfaction and wellbeing are key to retaining our staff. We have a shared framework of values and business principles that underpin local implementation. No work- related injuries was reported, no recordable cases of ill-health and zero incidents of discrimination in 2023.
	If applicable, please state your targets for gender and cultural equality and indicate the relative split of men/women at every level of the firm, particularly the Board of Directors and management team	Diversity, inclusion and equality is an important topic and target for Stillfront. Our target in terms of gender balance is to strive for 40/60 at all levels within the group. The group executive management consists of 5 men. The total gender representation in Stillfront was 32 percent women and 68 percent men in 2023. As of November 2024, the Board of directors consists of 4 men and 2 women.
	Does the company conduct any other community engagement activities aside from those directly connected to the business?	Yes, Stillfront's subsidiaries are active in supporting the communities where they are locally present as well as for the player audiences. Examples of activities are humanitarian aid such as supporting war zones, protection of vulnerable groups, reforestation, ocean clean-ups e.g.
	How often does the firm conduct audits of its suppliers, and how often do you discover incidents not compliant with your code of conduct?	Stillfront works closely with suppliers to make sure they are compliant with regulatory requirements and our code of conduct also applies to suppliers and partners. Stillfront seldom discover incidents not compliant with our code.



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S Social <i>(continued)</i>	Please list the firm's (1-2) primary means of making a positive social impact or minimizing negative social impact. Please list the corresponding most relevant UN Sustainable Development Goals. What proportion of sales can be directly linked to selected UN SDGs?	Mean #1	We strive to make a positive impact on people and society. We always try to make sure that gaming is not only a great social experience, but we also take responsibility for a safe, equal, and welcoming environment for everyone.	Corresponding SDG	10.2 Promote social inclusion of all
		Mean #2	Stillfront's most important asset is human capital. We are committed to build a work culture that is including, diverse, attracts talent and is value-based.	Corresponding SDG	8.5 Decent work for all. 5.5 Ensure women's equal opportunities for leadership
		Proportion of sales directly linked to selected UN SDGs	Stillfront does not measure sales in correlation to the UN SDGs.		



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	Questions	Answers
G Governance	Do all staff members receive continuing education on anti-corruption? Is there an external whistle-blower function? Are there any ongoing or historical incidents involving corruption, cartels or any other unethical business conduct? Have any preventive measures been taken?	Stillfront has a zero-tolerance stance against bribery, corruption and money laundering and has adopted an anti-bribery and anti-corruption policy that apply to all companies and professionals of Stillfront. Staff members receive continuous training on this. We are further committed to observing the standards of conduct set forth in applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations, including the United Kingdom Bribery Act 2010 and the United States Foreign Corrupt Practices Act. Stillfront's external speak-up system is publicly available on the external website and open for both internal and external reporting. Cases are handled in confidence by Stillfront's speak-up team which comprises the Chair of the board and the General Counsel. Historically, no substantial cases have been reported.
	Please state the firm's business tax residence (i.e. where the firm pays tax) and explain why that specific tax residence was chosen	Stillfront Group AB (publ)'s business tax residence is in Sweden where we are incorporated. Our subsidiaries business tax residences are the jurisdiction where the respective subsidiary is incorporated.
	How many independent members sits on the Board of Directors?	All directors are independent in relation to the company, company management, and the company's major shareholders.
	Please state if and to what extent, the company has transactions with related parties	Service agreements between Stillfront and subsidiaries are concluded on arm's length basis and on market terms. There are no transactions with related parties other than ordinary remuneration/benefit payments to related parties that are employees/consultants of Stillfront.



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	Questions	Answers
G Governance <i>(continued)</i>	Which KPIs dictate the remuneration to management (are sustainability and diversity goals included)?	Stillfront's remuneration guidelines govern the remuneration to the executive management team and links compensation to Stillfront's business strategy, sustainability, long-term interests and long-term value for its shareholders. Stillfront's sustainability targets and ambitions are incorporated into our remuneration framework. Stillfront's long-term incentive program for 2024-2028 is depending on Stillfront's annual achievement of three targets: two financial targets and one ESG target (comprising of one goal related to employee satisfaction and one related to data privacy). The program include CEO, senior executives and key personnel within Stillfront.



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	Questions	Answers
G Governance <i>(continued)</i>	Describe the company's process for monitoring and reporting ESG issues and performance to senior management/the Board. In your response please confirm what KPIs are monitored (if any) and how frequently reporting is undertaken	Stillfront's board of directors is overall responsible for Stillfront's business strategy, in which sustainability is integrated. The board is also responsible for Stillfront's key policies and steering documents including the Code of Conduct, Supplier Code of Conduct, Sustainability, HR, Data Protection & Privacy as well as Anti-bribery and Anti-corruption policies. The FAIR (Forum & Communities, Age protection, Inclusion & Diversity, Responsible Marketing and Monetization) guidelines are the primary steering document for how to operate the games and forums in a responsible manner and comprise the values and principles that serve as Stillfront's base as a responsible games company. The board decides on overall objectives and key performance indicators which are disclosed annually in the sustainability report. Stillfront's executive management team is responsible for the execution and implementation of the sustainability strategy. The executive management team is responsible for carrying out sustainability due diligence, conducting double materiality assessment and defining Stillfront's sustainability strategy and action plan, which is reviewed annually. The executive management team is, together with the board of directors, responsible for ensuring that sustainability impact, risks and opportunities are integrated in the company strategy and processes. Sustainability risks are addressed in the enterprise risk assessment conducted annually by the executive management team and are overseen by the board of directors. Stillfront's executive management team owns the agenda for prioritizing the group's material sustainability topics and developing tools and processes that guide the head office and the subsidiaries. The ESG strategy and action plan are implemented by Stillfront's sustainability forums that meet two to three times per year to discuss priorities, targets and progress. The sustainability forums include representatives of all subsidiaries. The management of each subsidiary is responsible for implementing Stillfront's policies and guidelines. For KPI's, please see Stillfront's sustainability report. The KPI's are measured yearly, next report to be published April 2025.
	Have you signed a Union agreement?	No



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PAI Numeric	Questions	Answers
	Revenue (EUR)	6,982 million SEK (2023).
	Greenhouse gas emissions; Scope 1, Scope 2, Scope 3	Stillfront's total GHG emissions for 2023 were 53,064 tCO₂e to be compared with 57,394 tCO₂e in 2022. The reduction of CO₂e emissions compared to the previous year is primarily driven by a reduction in scope 3 emissions. Scope 1 includes direct emissions from fuels for heating, delivery vehicles and passenger vehicles as well as from refrigerants and totals 78 tCO₂e for 2023. The emissions in Scope 1 increased by 4 percent compared to 2022. Scope 2 includes indirect emissions from purchased energy such as electricity, district heating and district cooling. The emissions in scope 2 market-based were 399 tCO₂e for 2023, a decrease of -19 percent compared to 2022. Scope 3 emissions, 52,588 tCO₂e for 2023, represent 99% of Stillfront's total emissions. The category Use of sold products (gaming hours) make up 94 percent of total Scope 3 emissions. In total, Stillfront Group's Scope 3 emissions decreased with 8 percent compared to 2022.
	Share of non-renewable energy consumption	The procurement of renewable electricity, represent 15 percent of total energy procurement (electricity, district heating and district cooling).
	Share of non-renewable energy production	Not applicable



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PAI Numeric <i>(continued)</i>	Questions	Answers
	Energy consumption in GWh	Total energy consumption was 1,986 MWh in 2023
	Tons of emissions to water	0
	Tons of hazardous waste and radioactive waste generated	0
	Unadjusted gender pay gap	No
	Board gender diversity	33 percent women, 67 percent men



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PAI (Yes/No) <i>(continued)</i>	Questions	Answers
	Fossil fuel operations	No
	Sites/operations located in or near to biodiversity-sensitive areas where activities negatively affect those areas	No
	Science Based Target	Yes
	Reports to CDP	No
	UN Global Compact Signatory	Yes
	Involved in the manufacture or selling of controversial weapons	No
	Whistle blower policy	Yes
	Supplier code of conduct	Yes, effective from January 1, 2025



»»» Stillfront