

sustainability  
report

2021

# Contents

<b>About the report</b> .....	4
<b>“Company at a glance”</b> .....	4
Legal name of organization.....	4
Location of Headquarters .....	4
Countries of Operation.....	4
Reporting period, frequency, and contact point .....	5
Sustainability Reporting.....	5
Financial reporting .....	5
Publication date.....	5
Contact point for questions about the report .....	5
Role of the highest governance body in sustainability reporting.....	5
<b>Letter from the CEO</b> .....	6
Impact value chain .....	7
<b>About envirom</b> .....	8
Company .....	8
Product.....	8
Production.....	8
Business relationships.....	9
Demographics in main markets .....	10
Employees .....	11
Governance structure and composition .....	12
<b>Global trends and challenges</b> .....	13
Demand for new solutions .....	13
The UN’s sustainable development goals.....	15

<b>Our materiality analysis</b> .....	16
We're different because our product is different.....	17
Envirom's materiality analysis.....	17
<b>People</b> .....	18
Work opportunities, health, safety and well-being.....	18
Diversity, equality and inclusion.....	19
Local responsibility, commitment and accessibility.....	20
<b>Planet</b> .....	22
Soil health and ecological impacts.....	22
Expected benefits from the use of Envirom CBX.....	24
Reduction of greenhouse gas emissions and energy consumption.....	24
Water consumption and wastewater management.....	26
Water use.....	26
<b>Performance/product/conduct</b> .....	27
Business ethics.....	27
Anti-corruption.....	28
Economic performance.....	28
Market presence.....	32
Product quality and safety.....	33
Product.....	33
<b>GRI Index</b> .....	34
GRI 2: General Disclosures 2021.....	34
GRI 3: Material topics 2021.....	34
People.....	35
Planet.....	35
Performance product and conduct.....	36

# About the report

## “Company at a glance”

### Legal name of organization

Envirom Group AS – referred to as envirom in the report. Envirom Group AS is a privately owned, incorporated company.

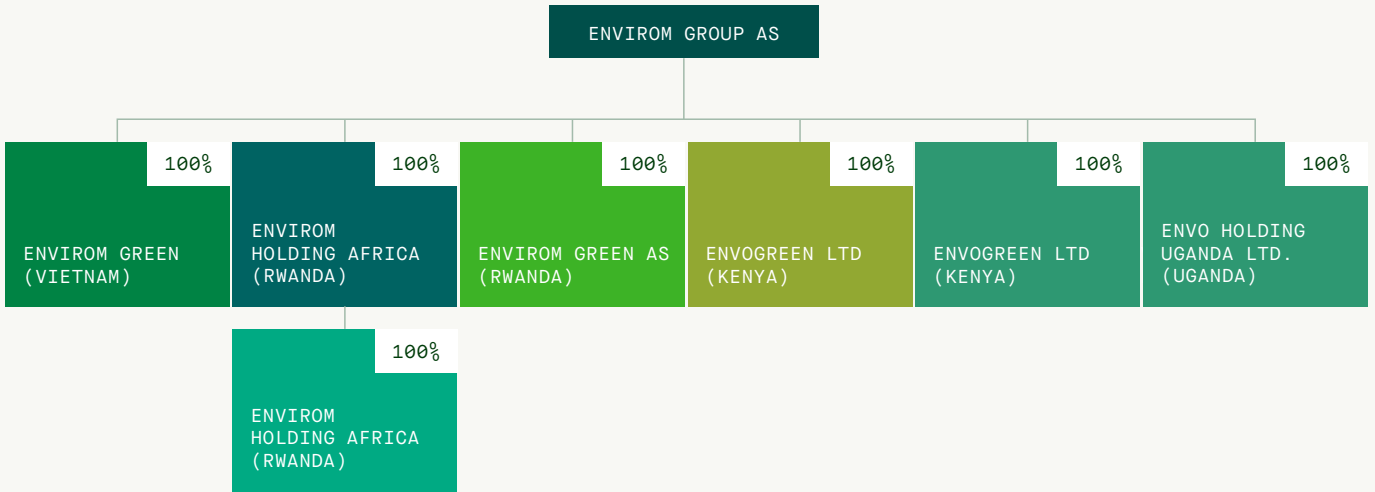
### Location of Headquarters

Envirom Group AS  
Grensen 9a  
0159 Oslo, Norway  
[www.enviromgreen.no](http://www.enviromgreen.no)

### Countries of operation

Norway, Rwanda, Kenya and Vietnam





## Reporting period, frequency, and contact point

### Sustainability reporting

The company will annually present a report on sustainability in accordance with the GRI Standards 2021.

### Financial reporting

The company's financial reporting period is 1st of January to 31 December 2021. in accordance with the GRI Standards 2021. This is envirom's first sustainability report.

### Publication date

July 2022

### Contact point for questions about the report

Chief Sustainability Officer  
 Hanna Rommerud:  
[hanna@enviromgroup.com](mailto:hanna@enviromgroup.com)



### Role of the highest governance body in sustainability reporting

The Sustainability Officer is responsible for the sustainability report, including the organization's material topics, but the senior management and board are continually updated on the work with regular meetings to remain actively involved with the ongoing processes.

As envirom is a small company with a limited number of people formal, structural reporting is still in its initial stages.

# Letter from the CEO

## We're different because our product's purpose is different

Yes, the next harvest is important – but what about the harvest in 10- or 20-years' time? Will we still be able to grow food for the population when soils are too poor to sustain growth? And if they are, at what cost?

Producing more is good, but it is a given. Producing better is the challenge. We want to bring back the respect for the environment we as a global community have lost along the way.

Envirom's ambition is to have a positive environmental as well as social impact on the world. Our mission is to help farmers grow more food in ways that are beneficial to the environment.

Envirom has not technically invented anything – we have looked at how nature works and created a product that merely optimizes the natural processes, using 99% natural ingredients.

Envirom CBX, our regenerative bio-fertilizer, promotes crop-growth and soil health in a way that ensures a safe food supply for the present and future generations. Less input + more growth = an increased profitability for the farmer & a sustainable food production.

We want to help in developing a farming system that benefits everyone – an ecosystem that creates sustainable value while fighting climate change

We are still a small company, but we strive to grow in a transparent and accountable fashion while limiting our negative impact on people and the planet.

This is our first sustainability report.



Henrik Rommerud  
CEO



**Everyone benefits from healthy soils.**

## Impact value chain

### People

Work opportunities, health, safety and well-being	●	○	●	○	○	○
Diversity, equality and inclusion	●	○	○	○	●	○
Local responsibility, competence development and accessibility	●	○	○	○	●	●
Product quality and safety	●	●	●	○	●	●

### Planet

Soil health and ecological impacts	○	●	●	○	●	○
Reduction of greenhouse gas emissions and energy consumption	●	○	●	●	○	○
Water consumption and wastewater management	○	○	●	○	●	○

### Performance

Business ethics	●	○	●	●	●	●
Economic performance	●	○	●	●	●	●
Market presence	●	○	●	●	○	●

<b>Key</b>	● High priority
	● Low priority
	○ Not applicable

CORPORATE      RAW MATERIALS      PRODUCTION      LOGISTICS      END USER      END OF LIFE

# About envirom

## Company

Envirom was established in 2012 in Oslo, Norway, with the intention of selling our regenerative biofertilizer envirom CBX to the agricultural sector in Europe. To gain market access the product had to be tested, and it was soon discovered that the product's immediate effectiveness increased in warmer temperatures. The decision to reorient efforts to East-Africa, with its tropical climate and two growth seasons per year, felt like a logical step forward.

Following this, the Rwandan subsidiary was established in 2016, and after several years of testing with local regulatory authorities envirom was granted import- and sales rights in October 2020. The Kenyan subsidiary was established in 2020, the Vietnamese in 2021 and the Ugandan is currently under establishment. The company is also working on import licenses in Vietnam, Nicaragua, and South Africa.

## Product

The basis for envirom CBX is a unique deposit of a mineraloid called Leonardite, in Idaho, USA, to which envirom holds the exclusive rights. Humic- and fulvic acids derived from Leonardite have the highest cation exchange capacity (CeC) (ability to hold essential nutrients and buffer against soil acidification) of any natural source on earth and are recognized by scientists and agronomists as key components of fertile soil. Envirom CBX also contain natural minerals, carbon, and other beneficial soil enhancing ingredients that stimulate microbial activity, improve soil quality, and optimize conditions for natural growth.

The Leonardite is a finite, non-renewable resource but relatively small amounts are required to produce envirom CBX (1 metric ton to 300.000 litres) so the mineraloid is only mined every 10 years.

It is the combined action of Leonardite and the solar-fed algae that is the secret behind our product's efficiency. CBX feeds the soil before feeding the plant – so turning fertilising into a virtuous circle.

## Production

Leonardite is excavated from an open mine in Idaho. It is the State of Idaho that owns the land on which the mine is located but we hold the mining claims. The final product requires, as mentioned above, only small amounts of leonardite, and it is therefore only necessary to excavate leonardite from the mine every 10-15 years. The excavation from the open mine is not a standard mining process, but rather a reservoir where the leonardite is easily accessible. The leonardite is filled in 1000 kg-bags of nylon and transported by truck from Idaho to the processing facilities in Phoenix. To do the actual digging an external company is hired.

In Phoenix, leonardite is mixed with enzymes and water, and then the mixture is processed in a drum for 6 months where a biological fermentation process is activated. The drum is turned a couple of rounds every other day, which requires little electricity.



During this phase, the mixture is very similar to mud. Next to the drum, algae are grown in several open pools, only driven by small electrical circulation pumps and solar radiation. When the algae production is finished in one pool, 70% of the algae water is taken out and mixed with the leonardite mud from the drum on a 300:1 scale. Additionally, small amounts of urea are added to stabilize the final product before it is filled in 1000L containers.

To reach the Rwandan market envirom cbx is first transported from Phoenix to Los Angeles Port, then transported by a container ship to either Mombasa in Kenya or Dar es Salaam in Tanzania. It is then transported by truck from the port to the office in Kigali in Rwanda where it is refilled into smaller plastic containers of either 0,5L, 1L, 5L or 20L and distributed to local farmers.

Envirom is in the process of buying the licence producer in Phoenix Arizona and part of the planned expansion will take place through local production in selected markets (“all business is local!”). The goal is to produce the Leonardite concentrate in Phoenix and move the production of algae and bacteria, the brewing, mixing, and bottling, closer to the markets.

The decision to move parts of the production closer to the markets is based on a need to reduce both transport costs and GHG-emissions. More local production will limit the unnecessary transport of water across the Pacific.

We are also looking into sustainable and affordable alternatives to single- use plastic bottles – either a re-use system or the innovative use of new materials.

Our product is easy to make, and the production process requires a small amount energy – apart from direct sunlight! We hope to in the future to be able to say that we are a carbon negative producer of fertilizer.

## Sales envirom CBX established markets 2019-ytd 2022

*Litres sold per year*

Market	2019	2020	2021	YTD 1.4 2022	Total
Kenya	0	0	0	25 273	25 273
Rwanda	2 446	640	1 737	995	5 818
Norway	832	0	0	0	832
<b>Total</b>	<b>3 278</b>	<b>640</b>	<b>1 737</b>	<b>26 268</b>	<b>31 923</b>

## Business relationships

Envirom has decided on a strategy that mainly targets key industrial partners as customers. These large companies have well-established organizations, distribution networks, storage facilities as well as solid financial standing, and are able to quickly utilize envirom CBX into their systems.

Swiss based Sucafina is one of the world's leading coffee merchants with companies such as Nestlé and Starbucks as customers. The company has activity in 45 coffee producing countries in Africa, Asia and South America. Sucafina has great focus on sustainable processes in all stages of coffee production – from growing, to washing and transport. Their vision is to be the leading sustainable “Farm to Roaster” coffee company in the world<sup>1)</sup>. Sucafina is also concerned with fair trade and ensuring that farmers in their system have access to health care and schools.

As sustainability strategies are becoming increasingly important in the corporate world, the exceptional effect of envirom CBX on yield, and its sustainable profile, have led Sucafina to indicate that they are considering a transition to a more extensive use of envirom CBX in the future.

One of Sucafina's main customers is Nestlé, the world's largest food and beverage company. As a major food industry pioneer, Nestlé has just initiated a project where the goal is to be a zero-emissions company within 2030. The decision to phase out chemical fertilizers has resulted in the inclusion of envirom CBX as an element of this ambitious strategy.

So far envirom has established a collaboration with coffee merchant Sucafina in Rwanda, Kenya and Uganda. Brazil and Vietnam are the world's two largest coffee producing countries, and Sucafina wants to partner with envirom in these large markets as well.

SNV<sup>2)</sup> (Stichting Nederlandse Vrijwilligers) is a Dutch development organisation with focus on three main sectors: agriculture, energy, and WASH (water, sanitation, and hygiene) with a local, long- term presence in 25 countries in Asia, Africa, and Latin America.

In the growth season 2020/21, SNV and envirom ran a joint potato project. The aim was to train 8.000 farmers, in three different districts in West Rwanda, in the use of CBX. This project was part of the larger programme “[HortInvest Rwanda](#)”. Upon completion of the project there was no doubt that the use of CBX had a positive impact on the farmers' yield which averaged at 32% increase – a result that in terms of income gave the farmers increased margins of USD 820 per hectare.

Due to the undeniable success of the potato project, SNV has initiated further tests on a number of important subsistence crops.

## Demographics in main markets

The agriculture sector employs up to 80% of the population in East African countries.<sup>3)</sup> Over 75% of the farmers are smallholders. Rwanda has a rural, agrarian economy with 83% of the population living in rural areas and 70% of the total population employed in the agricultural sector.<sup>4)</sup> In the western province, 47.1% of the population live below the poverty line.<sup>5)</sup> In Kenya 40% of the total population, and more than 70% of the rural

<sup>1</sup> <https://sucafina.com/>

<sup>2</sup> <https://snv.org/>

<sup>3</sup> <https://www.eac.int/agriculture>

<sup>4</sup> <https://www.fao.org/kenya/fao-in-rwanda/rwanda-at-a-glance/en/>

<sup>5</sup> <https://www.globallivingwage.org/wp-content/uploads/2020/08/Rural-Rwanda-LI-Reference-Value.pdf>

population, are employed in the agricultural sector.<sup>6)</sup> As a result, this sector provides the livelihood (employment, food security) for more than 80% of the population. Given the importance of the agricultural sector in the rural areas in both Kenya and Rwanda, to manage a reversal of soil degradation and an increase in crop yield would help strengthen the poorest and most vulnerable part of the population.

Gender disparity in the agricultural sector in Rwanda has been documented.<sup>7)</sup> The 2018 Integrated Household Living Conditions Survey (EICV5) shows that 63% of working females are in agriculture-related occupations compared to 43% among working males. The percentage of people involved exclusively in subsistence agriculture is higher among women (65.7%) than men (53%). The study also shows that the gender gap in agricultural productivity was found to be approximately 12%, meaning that on average, a female-managed farm was 12% less productive than a male-managed one. One of the reasons for this gender disparity is the reliance on traditional farming methods, a dependence on rain-fed agriculture, too small and scattered farm plots hindering their commercial production, and gender inequalities in access to, and utilization of, inputs and technology.

In Kenya women make up between 42% and 65% of the agricultural labour force (world Bank 2014). The accurate percentage is difficult to pinpoint as women do most of the domestic labour including tending the poultry. 85% of women work regularly on the family plot compared to 54% men. Rural women in Kenya are heavily dependent on men due to traditional gender roles.<sup>8)</sup>

## Employees

Employees 2021	Female	Male	Other	Not disclosed	Total
Number of employees	6	17			23
Number of permanent employees	1	5			6
Number of temporary employees	5	12			17
Number of non-guaranteed hours employees					
Number of full-time employees	6	17			23
Number of part-time employees					

Employees 2021	Oslo	Kigali	Niyabihu	Nairobi	Total
Number of employees	2	10	8	3	23
Number of permanent employees	2	1		3	6
Number of temporary employees		9	8		17
Number of non-guaranteed hours employees					
Number of full-time employees	2	10	8	3	12
Number of part-time employees					

<sup>6)</sup> <https://www.fao.org/kenya/fao-in-kenya/kenya-at-a-glance/en/>

<sup>7)</sup> <https://taarifa.rw/study-finds-rwandan-women-in-agriculture-squeezed-economically-marginalized/>

<sup>8)</sup> <https://www.researchgate.net/publication/340983625>

WOMEN AND AGRICULTURE IN RURAL KENYA ROLE IN AGRICULTURAL PRODUCTION

## Governance structure and composition

The Board of Directors is the highest governance body of envirom. As the company is small there are no committees. The board consists of one executive member (CEO) and three non-executive members. The chairman is not a senior executive of the company. There are no policies in place to safeguard the board's independence nor is the tenure of members regularized. No indicators of diversity relevant for reporting, and no stakeholder involvement apart from investors, so clearly room for improvement here.

The General Assembly select the Board of Directors. Members of the board have until now been chosen for their competencies relevant to the growing of the company. The shareholders' view has been included but no other stakeholders have been involved in the process of selecting the board. Diversity and independence have not been criteria included in the selection process so far, but the company recognizes the importance of stakeholder involvement and diversity inclusion for an innovative and progressive board structure and aims to rectify this situation on future boards.

The Sustainability Officer is responsible for the sustainability report, including the organization's material topics, but the senior management and board are continually updated on the work with regular meetings to remain actively involved with the ongoing processes. As envirom is a small company with a limited number of people formal, structural reporting is still in its initial stages.

Envirom has an embedded, if until now not clearly defined, philosophy of wanting to contribute to climate change mitigation and have a positive social impact on the markets in which we operate. The company now has a sustainability officer and has joined the [UN Global Compact](#).

Stakeholder involvement has primarily been limited to the shareholders on board level, but both the board and senior management recognize the importance of stakeholder involvement in formulating strategies and policies in the future. A broader stakeholder involvement was initiated to formulate the materiality issues in this report.

The board received in the reporting period share options in the company. Senior management receives a fixed pay, and up until now the salaries have been low by all comparable standards, but this is set to change in the coming year. There is currently no system for the evaluation of the board's performance in place as the company is small and "hands-on", but as the company grows these processes will need to be properly implemented.

The company also does not yet have a remuneration policy in place, and up until now the salaries have not been linked to performance in any way or form. Envirom recognises the importance of having such a policy in place to retain and recruit highly qualified board members, senior executives and other employees.

# Global trends and challenges



## To secure universal access to food

MORE PEOPLE ON THE PLANET  
CLIMATE CHANGE



## Deteriorating soil health

OVER-USE OF CHEMICAL FERTILIZERS  
CLIMATE CHANGE



## Expensive fertilizers

RISING ENERGY PRICES  
WAR AND UNREST

Policy makers must find a way to “feed the world and save the planet at the same time,” QU Dongyu, Director-General of the Food and Agriculture Organization of the United Nations (FAO), said at the G20 Leaders’ Summit in Rome (31.10.2021)

“Climate change will compromise our ability to produce sufficient amounts of nutritious foods and increase poverty and deepen inequalities,” Qu warned, on the eve of COP climate conference in Glasgow (01.11.2021).

### Demand for new solutions

The world is facing vast challenges in agriculture, the climate is changing, the global population is growing quickly, cities are expanding - and soils are becoming increasingly degraded. As both the global growth and demographic pressure are increasing the strain on farmed land, managing soil sustainability to ensure food security, for the present and future generations, has never been more important.

Food security is closely linked to healthy soils food as abundant crops need fertile soil to grow. Unfortunately, due to population increase, climate change, and farming practices the symptoms of soil degradation are becoming numerous and widespread. The decline of soil fertility, the development of acidity, salinization, deterioration of soil structure, accelerated wind and water erosion, and loss of organic matter and biodiversity<sup>9)</sup> are threats to the continued supply of food. The FAO estimates that industrial agriculture has depleted the world’s arable land with as much as 33%.<sup>10)</sup>

<sup>9)</sup> Principles for Sustainable Soil Management. UN Global Compact 2016

<sup>10)</sup> Voluntary Guidelines for Sustainable Soil Management. UN Food and Agriculture Organization, Rome, Italy 2017 (UN’s global land outlook)

To meet the growing global challenge of feeding more people on less land, the world needs to change its agricultural practices, and bring back the respect for the environment we have lost along the way. The world must develop a new set of farming values and there is a growing consensus in the food industry that Regenerative agriculture is the solution. Regenerative agriculture is an approach to farming that aims to restore soil health and soil-fertility – as well as increasing soil carbon sequestration and biodiversity. The key to regenerative agriculture is that is “does no harm” to the land but instead improves it, using technologies that regenerate and revitalize the soil and the environment. **Healthy soils = healthy plants = healthy people.**

The use of envirom CBX has a positive impact on the soil, and the application of CBX results in soil that gets richer year after year, plants that grow stronger and a substantial increase in yields. CBX helps the farmer ensure an adequate supply of food and adapt to more regenerative farming methods – protecting the environment.

A coffee farmer typically gets 0.1 cents from a \$2.5 cup of coffee.<sup>11)</sup> With the use of envirom CBX the farmers can increase their yield without increasing the cost of the input. The farmers can better feed their families, have better access to healthcare and education. The societal effect could be substantial.

As our ambition is to help grow an optimum amount of food in ways that are also beneficial to the environment, we believe we can positively contribute to the UN Sustainable Development Goals of eradicating poverty and hunger, reversing climate change and restore the soil.

These are bold ambitions, but this is not the time for timid actions!

For accountability, in 2021 envirom joined the UN Global Compact,<sup>12)</sup> where the company pledged to work in accordance with the 17 Sustainable Development Goals, and the Ten Principles of the UN Global Compact based on human rights, labour rights, the protection of the environment and anti-corruption.

<sup>11</sup> <https://www.ft.com/content/44bd6a8e-83a5-11e9-9935-ad75bb96c849>

<sup>12</sup> [www.unglobalcompact.org](http://www.unglobalcompact.org)

# The UN's sustainable development goals

Envirom has a positive impact on these four SDGs:

**Goal 1. End poverty in all its forms everywhere**

ENVIROM CBX GIVES FARMERS A HIGHER YIELD TO A LOWER COST



**Goal 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture**

ENVIROM CBX CONTRIBUTES TO BETTER SOIL CONDITIONS, WHICH LEADS TO IN HIGHER NUTRITIONAL VALUE IN THE PLANTS, THAT AGAIN LEADS TO BETTER NUTRITIONAL HEALTH IN THE POPULATION



**Goal 13. Take urgent action to combat climate change and its impacts**

ENVIROM CBX ENABLES THE FARMER TO REDUCE THE USE OF CHEMICAL FERTILIZERS BY AS MUCH AS 100%

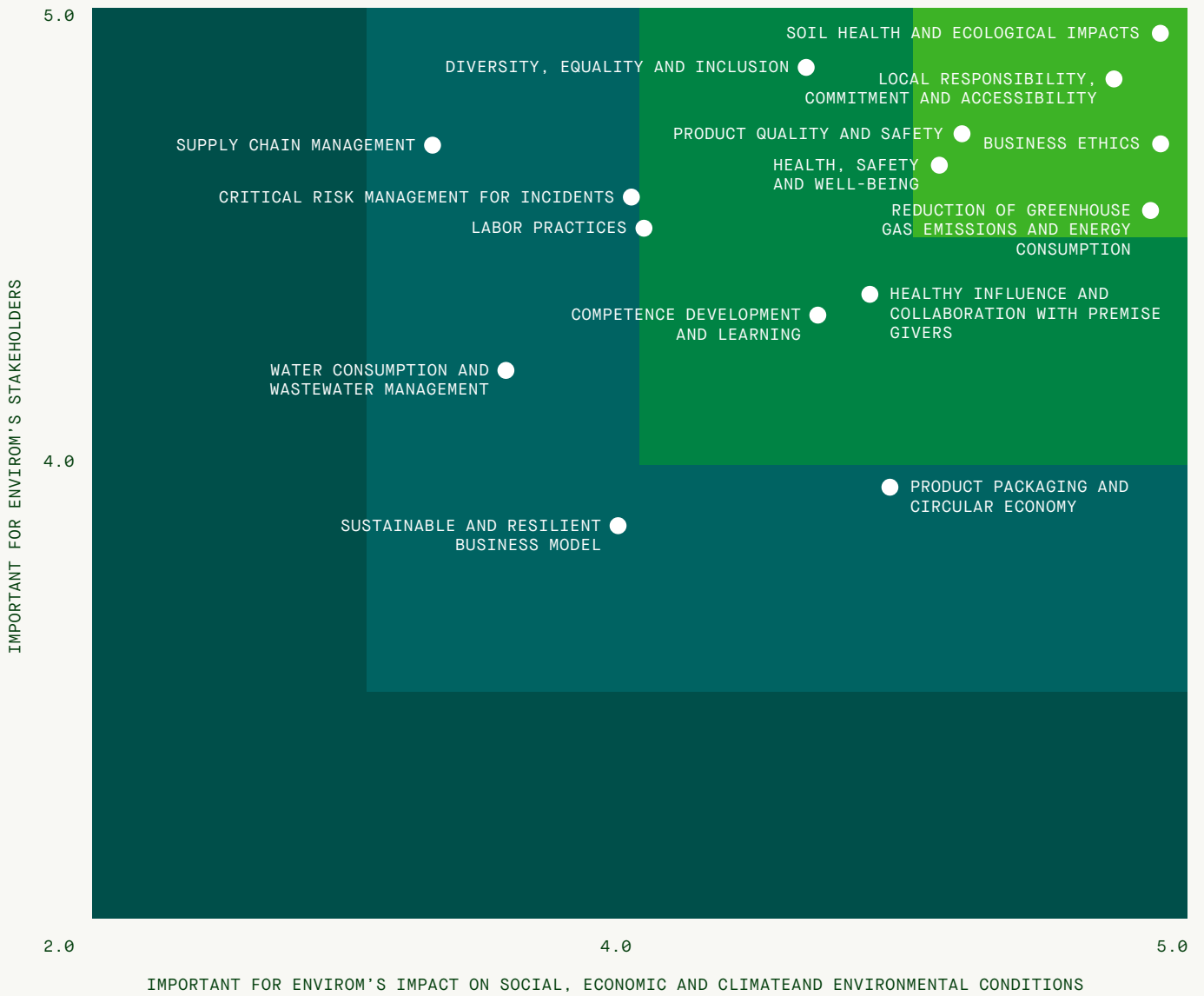


**Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss**

ENVIROM CBX RESTORES THE NATURAL BALANCE IN THE SOIL – AND HELP PREVENT DESERTIFICATION, EROSION, COMPACTION AND OTHER SOIL CHALLENGES



# Our materiality analysis





## **We're different because our product is different.**

Our ambition is to help grow an optimum amount of food in ways that are beneficial to the environment – and we strongly believe that it is possible to be a profitable business while at the same time focus on having a positive impact on people and planet – to sustainably grow into the future.

This is our first sustainability report, and envirom is still in the early stages of implementing many the reporting structures. We consider this report a benchmark analysis of our status and situation and will strive to align all our future activities to meet the requirements we are not fulfilling today.

## **Envirom's materiality analysis**

In the spring of 2022, we conducted a materiality analysis to determine which sustainability issues are particularly relevant for envirom and our stakeholders. The materiality analysis addresses the existing areas of impact as well as future potentially relevant sustainability issues and trends.

The analysis complies with the reporting requirements of the Global Reporting Initiative (GRI) and BDO Norway AS has had an advisory role in the process.

The analysis is based on stakeholder interviews, a stakeholder survey and a survey conducted within the company's management. The stakeholder's survey focused on their perceived importance of envirom's impact on Climate and Environment, Social Conditions, People at envirom, Production and Innovation and Management and Governance. We assessed a total of 23 issues divided in these 5 categories.

The management, with the guidance of BDO, has extensively discussed the results of the materiality analysis in order to pinpoint the most relevant issues for envirom to report on. The results from the materiality mapping indicate the topics envirom has chosen to include in this sustainability report, but the results also form an important foundation for the further development of our sustainable business strategy.

The materiality matrix shows these issues in accordance with their relevance. Soil health and ecological impacts, Local responsibility, commitment and accessibility and Business ethics have the greatest importance in terms of the analysis and the stakeholder survey, but Product quality and safety, Health, safety and well-being, and Reduction of greenhouse gas emissions and energy consumption are also very important.

# People

## Work opportunities, health, safety and well-being

Envirom has employees in Norway, Rwanda, and Kenya, but as the company is expanding the number of employees is continuously changing. We recognize the responsibility we have as an employer in areas of the world where labour rights are less protected by laws than in Europe, and we aim to be a fair and inclusive workplace that provide security and opportunities for our people.

In 2021 not all labour policies were yet properly in place, but we are in the process of implementing company-wide rules and regulation that will be made known throughout the organization.

Envirom has not yet implemented any policies or systems for controlling the supply chain, but this is considered important within the company and is something we are aiming to have in place by 2023.

	Female	Male	Age	Region	Total
Number of employees that left	0	1	30-50	Rwanda	1
Number of employees on parental leave	2	0	30-50	Rwanda	2
Number of employees eligible for parental leave	5	0	0	Rwanda	5
	1	1	0	Norway	2

In 2021 only one employee left the company – the CEO in Rwanda. As Covid-19 was still a challenge in 2021, no new people were hired.

In Rwanda, two women took parental leave. They are both now back to regular work. In Rwanda and Kenya men are not eligible for parental leave.

The company currently has no part-time employees, and the company is in the process of establishing a company-wide set of universal benefits. We want to ensure that at the very minimum every envirom employee is covered by insurance and a retirement-scheme in that is in accordance with national guidelines, but our aim is to be ahead of the minimum requirements.

Envirom does not yet have in place an occupational health and safety management system, but we recognize the importance of employee health and safety, and the necessary processes were started with the implementation of a Quality Management System (QMS) in 2022. We plan to have the QMS-system fully operational in every part of the company within the end of the year.

Envirom believes in the training and education of our employees. By strengthening the skills of the employees, we are strengthening the company as well. We think that giving people access to knowledge and science, the opportunity to grow, the feeling of being valued and valuable will create enthusiastic and loyal employees that remain in the company for a long time. That is why we are working to develop a training program for upgrading employee skills. Today we train our new employees consecutively as they are on-boarded but since an important part of our agronomists' job is to train farmers, it is important to keep them updated on the latest product developments.

Envirom aims to have an employee training program in place by 2023.

## Diversity, equality and inclusion

Envirom believes in diversity and equal opportunities because it is the right thing to do, but in 2021 our Board of Directors comprised only men so there is clearly room for improvement. Envirom is familiar with the idea that gender – and ethnically diverse boards "...contribute fresh insights and crucial technical skills that can improve board functions"<sup>13)</sup> but up until now the board has predominantly consisted of shareholders and not much focus has been given to its gender composition. This is set to change in the upcoming years, and our goal is to have a board that is 40% female by the end of 2024.

Envirom has a much better gender balance in the workforce, but within the management group the female ratio is still low. More effort will be made to on-board female leads in the future.

Board of Directors	Female	Male	Other	Total
Number of board members	0	4	0	4
Percentage of board members 30-50 years old	0	50%	0	50%
Percentage of board members above 50 years old	0	50%	0	50%

Employees	Female	Male	Other	Total
Percentage of employees under 30 years old	0	13%	0	13%
Percentage of employees 30-50 years old	26%	48%	0	74%
Percentage of employees above 50 years old	0	13%	0	13%

In Norway the remuneration ratio is 1:1 between the genders while in Kenya we do not have any female employees.

In Rwanda salary ratio of males to females is 57,69 – unlike most companies in the world the women in Rwanda make more money than the men!

<sup>13</sup> <https://www.forbes.com/sites/jasonwingard/2019/02/21/diverse-boards-propel-successful-companies-three-strategies-to-expand-pipelines/>

## Local responsibility, commitment and accessibility

Envirom believes in a shared value and collected impact strategy and sustainable business practice that benefit both the company and the local communities in which we operate. Our aim is to provide the farming inputs that help farmers create sustainable value while fighting climate change.

Envirom recognizes the importance of local stakeholder involvement, as well as the identification of vulnerable groups based on gender, age, ethnicity, and Indigenous background. These are considerations we will include further in future projects, but the stakeholder mapping for our local community involvement has so far been conducted by our business partners, Sucafina for coffee farmers and SNV for potato farmers.

To have a positive impact on local communities a part of our strategy<sup>14)</sup> is to join - or facilitate projects – in collaboration with not-for-profit organizations, and we are currently involved in several projects<sup>15)</sup>, with yet more planned.

In 2020-2021 we successfully partnered with SNV on the SNV/ HortInvest project<sup>16)</sup> (See page 10) “Improving potatoes production for increased food security and income in Rwanda”. Among other objectives, the project aimed at changing the mindsets of rural farmers to adopt modern regenerative farming methods, restoring soil balance, increasing sustainable productivity, and linking farmers to the market. Envirom supplied the fertilizers given to the Irish potato<sup>15)</sup> farmers participating in the project.

A total of 8,000 farmers were trained during the pilot phase. Envirom CBX provided tangible results in terms of the uptake of new farming technologies by smallholder farmers, increased yield, and soil regeneration. For Irish potatoes, productivity increased from 15 to 20 metric tonnes / hectares during the pilot phase which meant 820.000 (Rwf) in increased income<sup>17)</sup>.

Despite the above-mentioned positive results, most smallholder farmers are unable to afford CBX (or any other fertilizers) to continue the practice after the pilot phase is over, due to their financial limitations. To mitigate this situation, envirom is currently working on a project on microfinance for these farmers – especially directed and women and youth.

Envirom recognizes the importance of local stakeholder involvement, as well as the identification of vulnerable groups based on gender, age, ethnicity, and Indigenous background. These are important considerations that we will include in future projects, but the stakeholder mapping for our local community involvement has so far been conducted by our business partners, Sucafina for coffee farmers and SNV for potato farmers.

<sup>14</sup> <https://hbr.org/2016/10/the-ecosystem-of-shared-value>

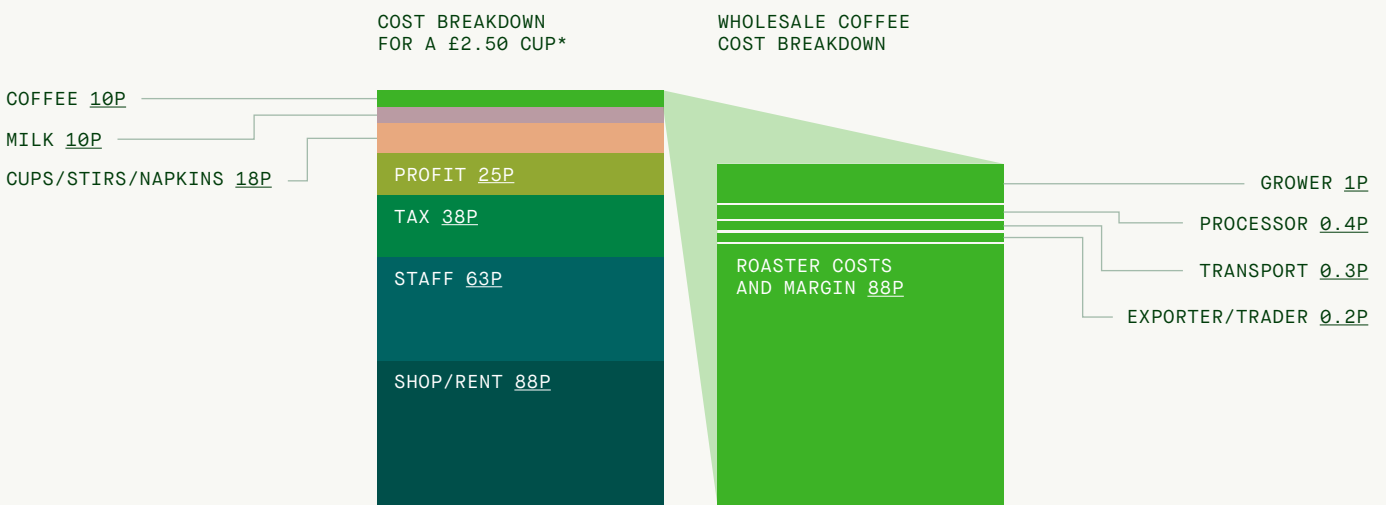
<sup>15</sup> <http://snv.org/country/rwanda>

<sup>16</sup> The term used to describe what in Europe is simply known as “potato”

<sup>17</sup> Tabell over increased income

Envirom is still in the early stages of sustainability reporting and has not yet implemented a reporting system, nor a system for tracking the effectiveness of each action taken, but with the application of the new Quality Management System we will be better able to evaluate and monitor our processes.

### Farmers get a fraction of the money you spend on your morning coffee



\*MAY NOT ADD UP TO TOTAL DUE TO ROUNDING  
 SOURCES: AELLGRA STRATEGIES; INTERNATIONAL TRADE CENTRE; FT CALCULATIONS  
 ©FT

# Planet

## Soil health and ecological impacts

Soil health – voluntary guidelines for sustainable soil management

“Soils are fundamental to life on earth” but human pressures on soil resources are reaching critical limits.<sup>18)</sup> In 2050, the world’s population is expected to have grown to 9.7 billion<sup>19)</sup> – 2 billion more than today. The challenge is how to sustainably increase agricultural productivity, protect the soil, and combat climate change when global demand for food is set to nearly double.

Soil has many functions: it is the world’s largest terrestrial pool of carbon, approximately 95% of global food is produced in soil<sup>20)</sup>, it stores water, and it supports biodiversity. According to the UN Food and Agriculture Organization (FAO) soil degradation poses a serious threat to the world’s ability to meet the increasing demands for food. Nutrient depletion, erosion, desertification and soil-salinization are all soil challenges that are strongly interlinked.

Lack of soil nutrients is the greatest obstacle to improving food production and soil function in many degraded landscapes. In Africa, all but three countries extract more nutrients from the soil each year than are returned through use of fertilizer, crop residues, manure and other organic matter. Accumulation of salts in the soil reduces crop yields and can completely eliminate crop production. Human-induced salinity affects an estimated 760,000 square kilometres of land worldwide – an area larger than all the arable land in Brazil.<sup>21)</sup>

Roughly 2 billion people (27%) of the world’s population are farmers<sup>22)</sup> – with 75% of the population in less developed countries. The farming poor are usually the hardest hit by natural disasters and are at the greatest risk of being seriously affected by climate change.

“Climate change affect the rural poor, their agriculture yields and productivity, contributing to increasing pests and diseases and changing the nutrient composition of major staple crops”.<sup>23)</sup>

<sup>18)</sup> Status of the World’s Soil Resources

<sup>19)</sup> How to feed the world in 2050

<sup>20)</sup> Voluntary Guidelines for Sustainable Soil Management. UN Food and Agriculture Organization, Rome, Italy 2017 (UN’s global land outlook)

<sup>21)</sup> <https://www.fao.org/soils-portal/data-hub/soil-maps-and-databases/global-map-of-salt-affected-soils/en/>

<sup>22)</sup> Food and Agriculture Organization – statistical yearbook 2021

<sup>23)</sup> <https://www.fao.org/world-food-day/en>

Soil health and ecological impacts



AGRICULTURE EMPLOYED 874 MILLION PEOPLE IN 2020, OR 27% OF THE GLOBAL WORKFORCE, COMPARED WITH ABOUT 1 050 MILLION FOR 40% IN 2000.

Chemical fertilizers provide the key ingredient for growth, but at the expense of the environment itself. Nitrogen is essential for soil fertility, but in excess it depletes the soil of nutrients, kills the microbial life, and acts as a dangerous pollutant that drives climate change through the emissions of the potent greenhouse gas, nitrous oxide.<sup>24)</sup> Chemical-based fertilizers have been the prime growth booster for decades - ever since the "green-revolution" in the 1950s but their many negative impacts on soil and climate are increasingly understood and recognized, and the FAO estimates that industrial agriculture has depleted the world's arable land with as much as 33%.<sup>25)</sup>

Furthermore, the production of chemical fertilizers requires about 1.2% of all fossil fuels produced.<sup>26)</sup> This high energy demanding production process leaves a big carbon footprint as well as making the price of chemical fertilizers very volatile. The price of chemical fertilizers have increased by 125% in the last year due to high energy prices and the war in Ukraine.<sup>27)</sup>

The urgency of these serious environmental challenges has forced policymakers to rethink the benefits of chemical fertilizers. In 2020 the EU introduced its new agricultural strategy "From Farm to Fork – for a fair, healthy and environmentally-friendly food system" as part of the European Green Deal. Here it is clearly stated that the EU's ambition is to reduce the use of chemical fertilizers with as much as 50% by 2030.<sup>28)</sup>

<sup>24</sup> <https://www.unep.org/news-and-stories/story/fertilizers-challenges-and-solutions>

<sup>25</sup> Voluntary Guidelines for Sustainable Soil Management. UN Food and Agriculture Organization, Rome, Italy 2017 (UN's global land outlook)

<sup>26</sup> Fertilizer.org

<sup>27</sup> <https://www.ifpri.org/blog/high-fertilizer-prices-contribute-rising-global-food-security-concerns>

<sup>28</sup> "From Farm to Fork – for a fair, healthy and environmentally-friendly food system" COM/2020/381 final

The challenge of the management of healthy soils seems to come down to two seemingly contradictory risks: on one hand, the greenhouse gas emissions and pollution of soils and waterways caused by overuse of chemical fertilizers and, on the other, the low yields associated with the underuse of fertilizers. These risks are severe considering the world's need to produce more food.

### Expected benefits from the use of Envirom CBX

When comparing envirom CBX with chemical fertilizers, the advantages of CBX are many. Bio-fertilizers can stimulate soil biology to produce nitrogen, they can open the soil for water penetration, they can increase nutrient availability and they can control diseases and enhance growth.

#### Envirom CBX provides the following key benefits:

- **Increases crop yields** - documented increase in yield 25% at a lower input cost for the farmer.
- **Low production emissions** - close to zero output production. More than 1.2% of the world's energy consumption goes to chemical fertilizer production.
- **Remedies soil compaction** - envirom CBX reduces compaction by creating micro-tunnels for deep air and water penetration, root growth and increased uptake of micronutrients – less runoff and erosion.
- **Reduces use of chemicals** - reduces use of chemical fertilizers by up to 100%.
- **Restores natural balance** – restores the natural balance in soil without the use of any environmentally harmful ingredients.

### Reduction of greenhouse gas emissions and energy consumption

To evaluate the carbon footprint of envirom, we have conducted an analysis of our emissions and energy consumption in line with the basic principles of the Greenhouse Gas (GHG) protocol and ISO 14044 standard.

The actual analysis has been conducted by Asplan Viak AS and BDO Norway AS has had an advisory role in the process.

The greenhouse gas emissions are divided into three categories called the Greenhouse Gas Scopes. Scope 1 comprises all the emissions we cause ourselves through our activities. Scope 2 includes all emissions that are due to external providers from whom we purchase energy such as electricity and gas. Scope 3 includes all the emissions that are generated before (upstream of) or after (downstream of) our business operations, including transport of product, flights and employee commuting.

Envirom's ambition is to be CO<sub>2</sub>-negative company within 2025. We are positioned to have a positive impact on climate change with a product that requires little energy to produce, but the negative impact from the transport of the product still must be mitigated for us to achieve this goal.



Agriculture accounts for 11% of the world's total greenhouse gas emissions - with chemical fertilizers responsible for 17% of these emissions. The transport sector is responsible for 25% of the global CO<sub>2</sub> emissions<sup>29)</sup> – of this shipping accounts for 11%.<sup>30)</sup>

	Source	Unit	Scope	Envirom Green AS (Norway)	Envirom Production (Rwanda)	Envirom Holding Africa (Rwanda)	EnvoGreen LTD (Kenya)	Total CO <sub>2</sub> emissions (See below)	
<b>Energy consumption</b>									
Consumed energy	Electricity	kWh	Scope 2	7 627,28	668,64	0,00	31,92	8 327,84	
<b>Transportation</b>									
Company vehicles (owned)	2 cars/4 motor-cycles	Gas	liter	Scope 1		6 985,97	0,00	6 985,97	
Company vehicles (rented)	1 rented car	Gas	liter	Scope 3			2328,66	2 328,66	
Company travels	Flights Europe		#of travels	Scope 3	7 200,00			7 200,00	
	Flights Africa		pkm	Scope 3	13 211,49			13 211,49	
Freight (not owned)	Flights Africa		tons/km	Scope 3			11 033,34	11 033,34	
	Truck	Diesel	tons/km	Scope 3		12 059,84	0,00	13 801,79	
	Container ship	Heavy oil	tons/km	Scope 3		20 470,57	0,00	20 470,57	
Scope 3					8 188,23	0,00	12 426,74	20 614,97	
Employee commuting	Car	Electricity	km	Scope 3	439,34			439,34	
	Train	Electricity	km	Scope 3	69,09			69,09	
<b>Waste</b>									
	Residual waste		kg	Scope 3	36,31	1,56	0,00	39,11	
	Paper, cardboard waste		kg	Scope 3	70,56			70,56	
	Electrical and electronic waste		kg	Scope 3	5,40			5,40	
<b>Emissions from production</b>									
See calculations from product emissions*				Scope 3**					
<b>Total CO<sub>2</sub> emissions</b>					<b>28 659,48</b>	<b>48 374,79</b>	<b>0,00</b>	<b>27 563,85</b>	<b>104 598,12</b>

\*CO<sub>2</sub> emissions per liter: 1,38 kg CO<sub>2</sub>e/liter product (1,55 kg CO<sub>2</sub>e/liter for US market/2,20 kg CO<sub>2</sub>e/liter for Rwanda market). Please see the report "Carbon Footprint Product\_Envirom Group" for details.

\*\*Emissions from production is categorized as scope 3 in 2021 as the US production facility was not acquired until June 2022.

<sup>29)</sup> <https://www.wri.org/insights/everything-you-need-know-about-fastest-growing-source-global-emissions-transport>

<sup>30)</sup> <https://ourworldindata.org/co2-emissions-from-transport>

The Haber-Bosch process, which converts hydrogen and nitrogen to ammonia under very high pressure, is the basic process to produce chemical fertilizers. The production process is very energy-demanding with a massive CO<sub>2</sub>-footprint. Most of the production sites around the world rely on natural gas, coal, or oil as their main energy source, although some hydroelectric power is used as well.

In comparison requires the production of envirom CBX very little energy. A small amount of electricity is used to blend the product, but the majority of the energy needed comes from direct sunlight and heat in the Arizona desert.

To limit the negative impact of the transportation of CBX across the Pacific CO<sub>2</sub> - emissions, the company is moving the production closer to the markets, and extensive tests to confirm the effect of CBX on carbon sequestration is planned.

When looking at the table it is important to know the CO<sub>2</sub> emissions appear higher per litre sold than the actual emissions per litre sold product in the future. In 2021 25.000 litres of CBX crossed the Pacific three times, due to a regulatory mix-up.

## Water consumption and wastewater management

Envirom is aware of the possible negative impacts of a product that requires substantial amounts of water to produce and use, especially in areas with water stress. We are in the process of developing alternative product forms and implementing a system for monitoring water use and assessing our water footprint.

### Water use

Envirom CBX is a liquid bio-fertilizer with a production process that requires a substantial amount of water. The wastewater discharge however is minimal with all water withdrawn included in the finished product. The product is diluted before application to soil or plants, and in drought sensitive areas this can be a challenge. Based on stakeholder feedback, envirom is looking into ways to minimize water reliance.

Today, agriculture uses up to 70% of global freshwater consumption. By continuing to develop and improve the efficiency of our water-using products we're enabling farmers to decrease their consumption.<sup>31)</sup>

Envirom CBX also has a possible positive impact on water use, however, as healthy soils have better water holding capacity than degraded soil. Rain and irrigation water are stored in air-pockets formed in healthy soil, and the soil's ability to absorb water like a sponge stops unnecessary run-off and eutrophication.

<sup>31</sup> <https://www.worldbank.org/en/topic/water-in-agriculture>

# Performance/product/conduct

## Business ethics

To fully commit to a responsible business conduct, envirom joined the UN Global Compact in April 2021. At the same time, envirom published a [Code of Conduct](#) online where we stipulate our commitment to protecting the environment, worker's rights, human rights, and fighting corruption in all its forms.

The values of trust, integrity and honesty are the foundation of envirom's ethical guidelines. The company is small and not all required policies are properly implemented yet, but it is based on these values that we begin our relationships, and it is through continued respect of these values, that the company will grow.

Envirom has formulated a Code of Conduct<sup>32)</sup> and anti-corruption policy but no system for the assessment of risks related to corruption was in place in 2021 (but are now). The recent implementation of a Quality Management System provides a very useful tool for risk assessments, their possible prevention, and remediation in case of an incident. Critical concerns and possible conflicts of interest are communicated and handled by senior management, and all problems have been dealt with on an ad hoc basis as the company is small and transparent. There has not been any formal reporting structure in place until now, but we recognize the need for due diligence to be properly systematized to ensure continuous improvement our sustainability work.

The Management team and the Board of Directors stand behind envirom's anti-corruption policies, but the remainder of the employees and business partners have not yet been properly informed about these policies. The [Code of Conduct](#) is published on our website and readily available for anyone interested to read, but no formal system for sharing our policies have been in place until now. The company is in the process of compiling an Employee Handbook

The company-wide implementation of the Quality Management System will provide all members of the organization full access to the different company policies, and we are in the process of developing a training programme on anti-corruption that we hope will enable all representatives of envirom – on every level – to **Always Do the Right Thing!**

<sup>32</sup> [www.enviromgreen.com/codeofconduct](http://www.enviromgreen.com/codeofconduct)

## Anti-corruption

The Tenth Principle of the UN Global Compact states that “Businesses should work against corruption in all its forms, including extortion and bribery”.

Corruption impedes the development of societies into well-functioning communities with equal opportunities for all people and businesses, especially in countries with less robust economies and alternative product forms and implementing a system for monitoring water use and assessing our water footprint.

Envirom operates in parts of the world where corruption is widespread and common, and this makes it very important for us to have a solid “anti-corruption” policy that is unequivocally in its approach to this problem.

In our “Code of Conduct” we state that: “envirom has a no-tolerance corruption policy that states that all forms of bribery and corruption are unacceptable and that this relates to all business relations”.

We are also introducing a QR-code for easy employee-reporting on incidences, and Whistleblowing.

We have no confirmed incidents of corruption.

## Economic performance

We want to create long-term value through growth, product development and a positive impact on people and planet.

Envirom experiences the farmers’ urgent need to transition to a more sustainable form of agriculture due to climate change, soil challenges and new regulatory framework. The application of envirom CBX has a positive impact on the soil, the nutrient content in the plants<sup>33</sup>) and the yield. We aim to provide a way for farmers to create value while at the same time combat climate change.

As the world is expecting to see a shift to a farming sector less reliant on conventional fertilizers this creates a scenario with a great demand for sustainable solutions for agriculture and a high growth-potential for envirom CBX.

<sup>33</sup> [Envirom test with IDEAGRO](#)

## Consolidated statement of profit or loss and other comprehensive income

For the year ended 31 December 2021

	Note	2021	2020	2019
<i>(All figures in USD 1 000)</i>				
Revenues from contract with customers	3	36	66	255
Other operating income		0	24	20
<b>Total operating income</b>	<b>5</b>	<b>36</b>	<b>91</b>	<b>275</b>
<b>Operating expenses</b>				
Cost of goods sold		5	79	50
Employee benefit expenses	4	507	199	312
Depreciation and amortisation expense	8,9	65	59	61
Other operating expenses	5	1 339	269	220
<b>Total operating expenses</b>		<b>1 916</b>	<b>606</b>	<b>643</b>
<b>Operating result</b>		<b>-1 880</b>	<b>-515</b>	<b>-368</b>
<b>Finance income and expense</b>				
Finance income	6	34	7	0
Finance expense	6	577	140	51
<b>Net finance income and expense</b>		<b>-543</b>	<b>-133</b>	<b>-51</b>
<b>Profit before tax</b>		<b>-2 423</b>	<b>-648</b>	<b>-419</b>
Tax expense	7	-400	-94	-64
<b>Profit</b>		<b>-2 023</b>	<b>-554</b>	<b>-355</b>
<b>Other comprehensive income</b>				
<i>Items that will or may be reclassified to profit or loss:</i>				
Exchange gains arising on translation of foreign operations		-25	6	-17
<b>Total comprehensive income</b>		<b>-2 048</b>	<b>-548</b>	<b>-372</b>
<b>Total comprehensive income attributable to:</b>				
Owners of the parent		-2 048	-48	-372

## Consolidated statement of financial position

As at 31 December 2021

Assets	Note	2021	2020	2019	01.01.2019
<i>(All figures in USD 1 000)</i>					
<b>Non-current assets</b>					
Deferred tax asset	7	322	115	25	21
Goodwill	8	123	0	0	0
Intangible assets	8	255	104	107	128
Property, plant and equipment	9	335	343	386	420
Right-of-use assets	9	66	85	72	98
Financial assets		7	228	276	285
Other non-current assets		83	284	211	248
<b>Total non-current assets</b>		<b>1 191</b>	<b>1 159</b>	<b>1 077</b>	<b>1 200</b>
<b>Current assets</b>					
Inventories	10	158	200	210	175
Trade receivables and other receivables	11	140	199	187	270
Other current receivables	11	605	747	711	312
Cash and cash equivalents	12	522	188	169	28
<b>Total current assets</b>		<b>1 425</b>	<b>1 334</b>	<b>1 277</b>	<b>785</b>
<b>Total assets</b>		<b>2 616</b>	<b>2 493</b>	<b>2 354</b>	<b>1 985</b>

## Consolidated statement of financial position

As at 31 December 2021

Equity and liabilities	Note	2021	2020	2019	01.01.2019
<i>(All figures in USD 1 000)</i>					
<b>Equity</b>					
Issued capital and reserves attributable to owners of the parent	7	322	115	25	21
Share capital	8	123	0	0	0
Share premium	8	255	104	107	128
Own shares	9	335	343	386	420
Foreign exchange reserve	9	66	85	72	98
Other reserves		7	228	276	285
<b>Total non-current assets</b>		<b>1 191</b>	<b>1 159</b>	<b>1 077</b>	<b>1 200</b>
<b>Liabilities</b>					
Deferred tax	10	158	200	210	175
Loans and borrowings	11	140	199	187	270
Lease liabilities	11	605	747	711	312
<b>Total current assets</b>		<b>1 425</b>	<b>1 334</b>	<b>1 277</b>	<b>785</b>
<b>Current liabilities</b>					
Loans and borrowings	14		0	0	0
Trade payables	2	574	639	621	510
Current lease liabilities	15	15	2	4	0
Public duties payable	2	-42	2	10	4
Income tax payable	7	0	0	0	0
Other current liabilities		664	1 629	348	147
<b>Total current liabilities</b>		<b>1 211</b>	<b>1 629</b>	<b>983</b>	<b>661</b>
<b>Total liabilities</b>		<b>1 600</b>	<b>1 959</b>	<b>1 317</b>	<b>788</b>
<b>Total equities and liabilities</b>		<b>2 616</b>	<b>2 493</b>	<b>2 354</b>	<b>1 985</b>

## Market presence

Envirom’s aim is to be a fair and supportive employer, and we want to pay our workers a decent living wage.

By promoting proper pay, decent work and inclusive employment opportunities, business plays a role in advancing societal priorities, in building more resilient economies and communities. The payment of proper wages is also the most effective method for combatting poverty.

Envirom also recognises that our employees are one of our most important assets. Employees paid a decent wage will feel more valued by the company and are more likely to invest in their job.

No employees are covered by collective bargaining agreements, but all receive pay above the minimum wages in Rwanda and Kenya.

**Annual total compensation for the organization’s highest paid – individual**

USD **74 412**

**Median annual total compensation for all of the organization’s employees excluding the highest paid individual**

USD **7 596**

The annual total compensation ratio is 9,7:1 between the highest paid individual and the median annual compensation for all employees.

100% of the senior management at significant locations of operations are local.

Norway: CEO from Norway  
 Rwanda: CEO from Rwanda  
 Kenya: CEO from Kenya

“Senior management” is the management team at the different locations. The geographical definition of “local” is country, and we define every country in which we have established a presence as a “significant location of operation”.



## Product quality and safety

Most countries have a set of comprehensive regulations for the import and distribution of fertilizers.

Envirom has performed extensive tests on the general safety and efficacy of the product, as well as specific tests on important food crops such as maize, rice, beans and potatoes to obtain the necessary approvals in the different markets.

## Product

In the markets envirom CBX is approved for sale, the following types of information are required to acquire import licence, and/or be included on the label:

1. **The sourcing of the components of the product** – not required on label
2. **The contents of the product must be documented** – required on label
3. **Recommended use of product** – required on label
4. **Safe disposal of bottle** - not required (but envirom is currently looking at new ways of safely deposit plastic bottle after use, or the possibility of switching to a different type of packaging)

All of envirom's products are covered by these requirements.  
There are no incidents of non-compliance.

# GRI Index

## GRI 2: General Disclosures 2021

Disclosure	Page	Omission	Comments
2-1 Organizational details	4		
2-2 Entities included in the organization's sustainability reporting	5		
2-3 Reporting period, frequency and contact point	5		
2-4 Restatements of information		First sustainability report	
2-5 External assurance		No external assurance	
2-6 Activities, value chain and other business relationships	8		
2-7 Employees	11		
2-8 Workers who are not employees	11		
2-9 Governance structure and composition	12		
2-10 Nomination and selection of the highest governance body	12		
2-11 Chair of the highest governance body	12		
2-12 Role of the highest governance body in overseeing the management of impacts	12		
2-13 Delegation of responsibility for managing impact	12		
2-14 Role of the highest governance body in sustainability reporting	5		
2-15 Conflicts of interest	12		
2-16 Communication of critical concerns	27		
2-17 Collective knowledge of the highest governance body	12		
2-18 Evaluation of the performance of the highest governance body	12		
2-19 Remuneration policies	12		
2-20 Process to determine remuneration	12		
2-21 Annual total compensation ratio	12		
2-22 Statement on sustainable development strategy	6		
2-23 Policy commitments	12		
2-24 Embedding policy commitments	12		
2-25 Processes to remediate negative impacts	27		
2-26 Mechanisms for seeking advice and raising concerns	27		
2-27 Compliance with laws and regulations	27		
2-28 Membership associations	27		
2-29 Approach to stakeholder engagement	12		
2-30 Collective bargaining agreements	18		

## GRI 3: Material topics 2021

Disclosure	Page	Omission	Comments
3-1 Process to determine material topics	17		
3-2 List of material topics	16		

## People

Disclosure	Page	Omission	Comments
3-3 Management approach	18		
<b>Employment 2016</b>			
401-1 New employee hires and employee turnover	18		
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	18		
401-3 Parental leave	18		
403 Occupational health and safety			No occupational health and safety system was in place in 2021. This is now implemented.
<b>Training and Education 2016</b>			
404-2 Programs for upgrading employee skills and transition assistance programs			No systematized staff training programs was in place in 2021. We aim to have this in place by 2023.
<b>Diversity and Equal Opportunity 2016</b>			
405-1 Diversity of governance bodies and employees	19		
405-2 Ratio of basic salary and remuneration of women to men	19		
<b>Local Communities 2016</b>			
413-1 Operations with local community engagement, impact assessments, and development programs	20		No systematized assessment of the positive impact on the local communities. The goal is to have this in place within a three-year time frame.

## Planet

Disclosure	Page	Omission	Comments
3-3 Management approach	22		
<b>Energy 2016</b>			
302-1 Energy consumption within the organization	25		
302-3 Energy intensity	25		
<b>Water and Effluents 2018</b>			
303-1 Interactions with water as a shared resource	26		No detailed data on wateruse/ groundwater extraction. This will be reported on next year.
<b>Emissions 2016</b>			
305-1 Direct (Scope 1) GHG emissions	25		
305-2 Energy indirect (Scope 2) GHG emissions	25		
305-3 Other indirect (Scope 3) GHG emissions	25		
305-4 GHG emissions intensity	25		

## Performance product and conduct

Disclosure	Page	Omission	Comments
3-3 Management approach	28		
<b>Economic performance 2016</b>			
201-1 Direct economic value generated and distributed	28		
201-2 Financial implications and other risks and opportunities due to climate change			No system is in place yet to calculate the financial implications due to climate change. The goal is to have this in place within a three year time frame.
201-3 Defined benefit plan obligations and other retirement plans			Not all employees were in 2021 covered by defined benefit plans. This will be in place by 2022.
201-4 Financial assistance received from government			No financial assistance was received from government.
<b>Market presence 2016</b>			
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	32		
202-2 Proportion of senior management hired from the local community	32		
<b>Anti-corruption 2016</b>			
205-1 Operations assessed for risks related to corruption	27		No formal risk assessment was in place in 2021.
205-2 Communication and training about anti-corruption policies and procedures	27		
205-3 Confirmed incidents of corruption and actions taken	28		
<b>Marketing and labelling 2016</b>			
417-1 Requirements for product and service information and labeling	33		
417-2 Incidents of non-compliance concerning product and service information and labeling	33		
417-3 Incidents of non-compliance concerning marketing communications	33		

