

# SUSTAINABILITY REPORT

# 20 23



 NRC Group

# About this report

NRC Group has been reporting on sustainability since the company was listed on the Oslo Stock Exchange in 2015. Previous reporting can be found in our Sustainability, Annual and Quarterly Reports, which are available on our website [www.nrcgroup.com](http://www.nrcgroup.com)

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards (2021). The report covers material environmental and social impacts and the management approach of NRC Group for 2023. A description of the determination of material topics for reporting is included in the appendix of the report.

This report includes NRC Group's EU Taxonomy Regulation disclosures, satisfying Norwegian legal requirements relating to the Publication of sustainability information in the financial sector and a framework for sustainable investments Act.

Where relevant and appropriate, a number of references are made throughout the report to the EU Sustainability Reporting Standards (ESRS). Under the EU Corporate Sustainability Reporting Directive (CSRD), NRC Group will be required to comply with the ESRS for its reporting of environmental, social and governance (ESG) matters in its 2024 Annual Report (published in 2025) and future ESG reporting.

As a member of the United Nations Global Compact (UNGC) Norway, this report serves as our Communication on Progress. A detailed description and assessment of our contribution to the achievement of the UN Sustainable Development Goals (SDGs) is included in the appendix.



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# INTRODUCTION

# 01



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# 2023

# Key results

## ESG performance measures

Lost time injury rate

↓ **5.6**

2022: 6.0

Female employees

→ **10.7%**

2022: 10.7 %

Sustainability training

↑ **95%**

2022: 81 %

GHG emissions\*

↑ **13,770** tCO<sub>2e</sub>

2022: 13,051 tCO<sub>2e</sub>

Employees

↓ **1,853**

2022: 1,960

Recycling rate

↓ **89%**

2022: 94 %

Revenue

↓ **6.7** BNOK

2022: NOK 7.0 billion

EBIT adj\*\*

↓ **121** MNOK

2022: NOK 137 million

EU taxonomy aligned

↑ **72%**

2022: 67%

\* Scope 1+2+3

\*\* Before other income and expenses

# CEO statement

## We are converting our sustainability credentials into a contract-winning competitive advantage.

Building a low-carbon future is at the core of our business. We are working on projects across the Nordics that have a real and positive impact, helping to decarbonise society. At the same time, we are converting our sustainability credentials into a contract-winning competitive advantage. An example of this is our UNB10 project, where NRC Group is building a new double track on the Vestfold line. Here, decisions made early in the project have had considerable impact in reducing total emissions. Identifying and modelling best-practice sustainability solutions across our business, together with our partners, are fundamental to our success.

How we build matters to us, and we are committed to operating safely, while developing human capital and protecting the environment. By setting targets and transparently disclosing our performance via our sustainability report, we aim to credibly demonstrate our progress on sustainability issues and build trust amongst our stakeholders. Our target to reduce our greenhouse gas emissions is minimum 30% by 2025.

### **Targeted action for a sustainable business model**

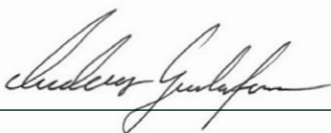
To foster a successful business model, we actively manage areas where we have material impacts on people or the environment, while at the same time being mindful of risks and opportunities affecting our operations. Regarding environmental impacts, we are both focused on reducing our own greenhouse gas emissions and working to create infrastructure that enables others to do the same. This involves constant growth of our institutional maturity regarding these issues, as well as being open to new technological solutions. We are also cognisant of the climate risks facing our business and these are disclosed in this report, in line with the recommendations of the Taskforce on Climate-related Financial Disclosure (TCFD).



Our employees are our greatest asset and form a key part of our sustainability impact at NRC Group. They act both as a driver of positive impact for the company with education on sustainability issues through our sustainability certification programme, which currently has a completion rate of 95%. We are proud to see the efforts made by all our employees in this field in 2023. In line with our values caring, credible and entrepreneurial, we are building a strong safety culture and an attractive place to work. By emphasising both diversity and health & safety, we want to be able to create a safe, inclusive and innovative workplace where our employees can prosper.

On the topic of ethical business practices, if we are to continue to be seen as a credible operator in the market then it is paramount for us to have our own house in order. We updated our Code of Conduct in 2023 and are continuously working to uphold our target of zero breaches, which was achieved in 2023. Anticipating the evolving landscape, we look forward to sharing our new strategy during our Capital Market Update in May, setting the stage for our next period of activity leading towards 2028. This strategic roadmap will encapsulate our vision, priorities, and the path we chart to capitalise on emerging opportunities in building sustainable societies.

I want to take this opportunity to thank our dedicated team for their strong commitment to achieving our shared goals and for continued efforts to deliver safe operations in our projects.



**Anders Gustafsson,**  
CEO NRC Group

**How we build matters to us, and we are committed to operate safely, while developing human capital and protecting the environment.**



# ABOUT NRC GROUP

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# This is NRC Group

**We deliver infrastructure,  
 not bureaucracy.**

### **Enabling the transition to a low-carbon future**

NRC Group delivers long-term, low-carbon infrastructure solutions that create value now and for future generations.

### **Building sustainable infrastructure**

NRC Group develops and supplies services to build critical sustainable infrastructure. This includes the entire value chain for the prioritised markets such as rail, civil and maintenance. The service offering includes groundwork, specialised trackwork, electro, signalling systems, demolition, recycling, and mass transport. A unique set of capabilities and services from planning and project management to construction and maintenance is provided to build complex infrastructure.

### **Strong footprint in the Nordics**

NRC Group is an infrastructure company in the Nordics with nearly 2,000 professionals. The company is listed on the Oslo Stock Exchange (OSE: NRC). The Group operates from offices in Finland, Sweden and Norway (Head office) and has an annual turnover of NOK 6.7 billion.

### **Our operating context**

Access to high-quality, low-carbon sustainable infrastructure solutions is becoming increasingly important as Nordic cities and populations grow. NRC Group contributes to the construction and maintenance of rail infrastructure, including railways, metro and light rail. The projects we deliver enable greener, safer and more efficient transportation of people and goods.

### **Vision**

Being the most attractive partner and employer of tomorrow's infrastructure.

### **Mission**

We create infrastructure that goes beyond the demands of today and tomorrow – both for people and the society.

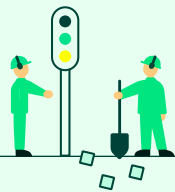
### **Fully integrated value chain**

We deliver the complete value chain with a unique set of in-house capabilities and services from planning and project management to construction and maintenance.

How we execute our projects, matters to us. Being entrepreneurial at our core is key for our commitment to succeed with our sustainability strategy.



# Our values

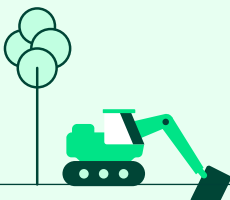
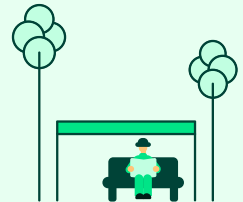


## Caring

We care for the safety of our employees and suppliers. We make sure to plan and act for the safety of people and our society.

## Credible

We lead by the highest ethical standards. We walk the talk and deliver quality on time and budget. For us, promises exist to be kept.

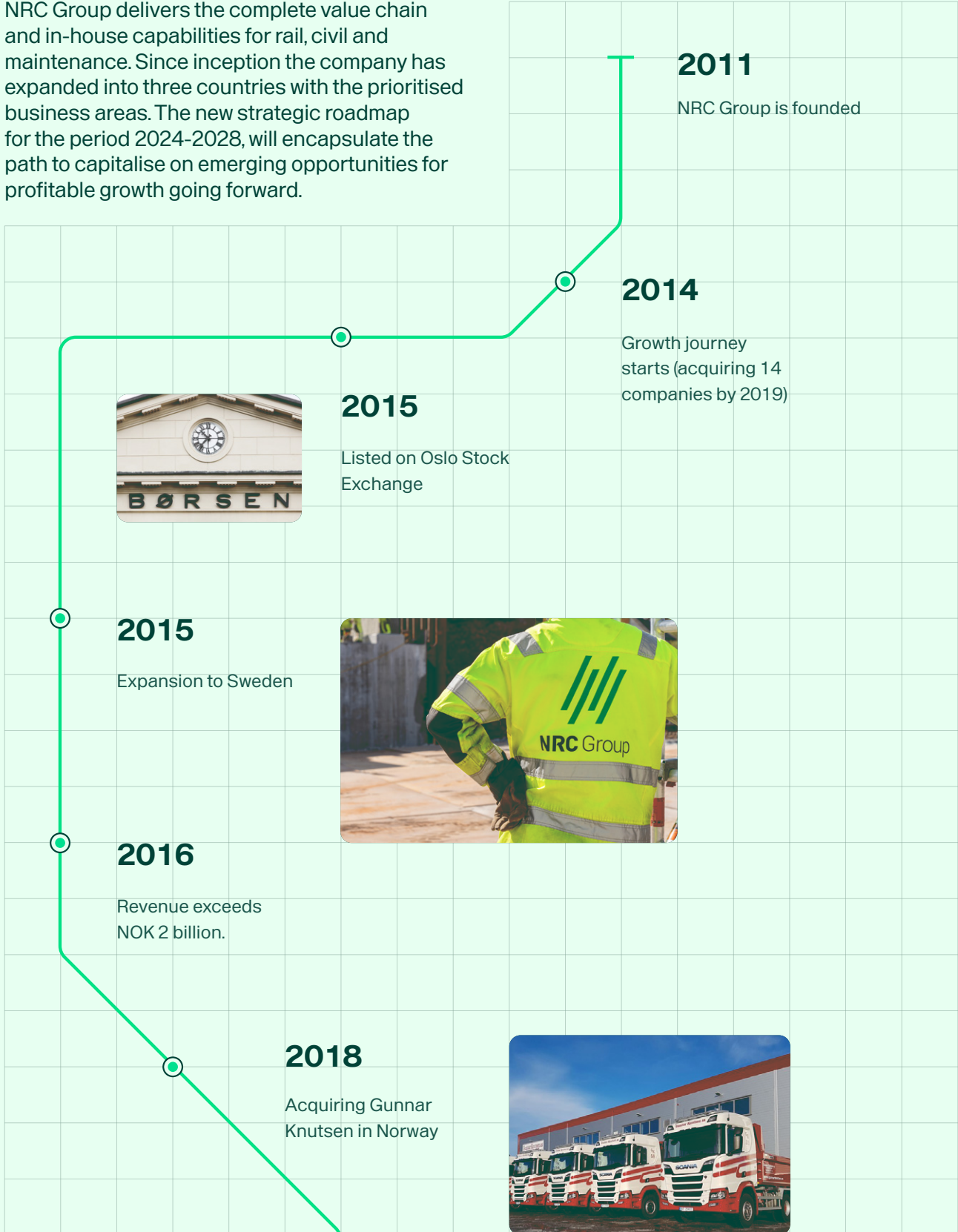


## Entrepreneurial

We deliver infrastructure, not bureaucracy. We are driven by a strong commercial mindset.

# OUR HISTORY

NRC Group delivers the complete value chain and in-house capabilities for rail, civil and maintenance. Since inception the company has expanded into three countries with the prioritised business areas. The new strategic roadmap for the period 2024-2028, will encapsulate the path to capitalise on emerging opportunities for profitable growth going forward.



## 2019

Expansion to Finland /  
Acquiring VR Track in  
Finland

## 2019

Revenue exceeds  
NOK 6 billion

## 2019

Winning Jokeri Light Rail –  
largest contract awarded  
to NRC Group (EUR 220  
million) so far

## 2020

Capital Markets Update  
presenting strategy for  
2020-2024

## 2020

Materiality assessment and  
first Sustainability Report



## 2021

Sustainability certification  
for all 2000 employees

## 2021

First reporting on the EU  
Taxonomy

## 2021

Winning electrification of  
Trønder og Meråkerbanen (NOK  
760 million) – collaboration with  
Norway and Sweden







# Our strategy and progress to date

In 2021 we developed our first 4-year sustainability strategy to take us out to 2025. The strategy set out our six focus areas, including targets and the underlying action plans to achieve them. We have made considerable progress to date and remain on track to deliver on the majority of our key targets. Along the way we have achieved a number of significant milestones and it is with this momentum we will begin our strategy refresh process in 2024. In May 2024, we will release our new 2025 – 2028 business strategy, including our updated sustainability ambitions.

Set sustainable priorities (2021-2024)

2021

Achieved 12% GHG emission reduction compared to 2020

2021





# Sustainability approach

**Sustainability is at the core of NRC Group's strategy, and it is embedded in our company's values, and the way we work. The impact of our work extends from the local level to the wider society.**

NRC Group is in the business of constructing and maintaining sustainable and resilient infrastructure. Most of our projects are specifically designed to enable efficient and low carbon mobility and transport solutions, such as railway, light rail systems, subways and metro. Our future growth will be driven by how effectively we capture the long-term value opportunities associated with the favourable investment landscape for sustainable infrastructure in the Nordic region. This opportunity is underscored by the national infrastructure budget proposals and national transport plans in Norway, Sweden and Finland.

We are focused on reducing our own greenhouse gas emissions and are working to create infrastructure that enables our clients to do the same. Our business is committed to meeting the Paris agreement climate goals by reducing our own emissions and those in our supply chain. We are aiming to achieve a credible net zero position by 2050. We will pursue these emission reductions by shifting our heavy vehicle fleet to biogas and other renewable fuel sources, electrifying suitable equipment, and implementing operational efficiency measures to reduce the idling time of machinery. Of all our emission reduction efforts, we will focus most of our attention on practical and proven technology and behaviour change.

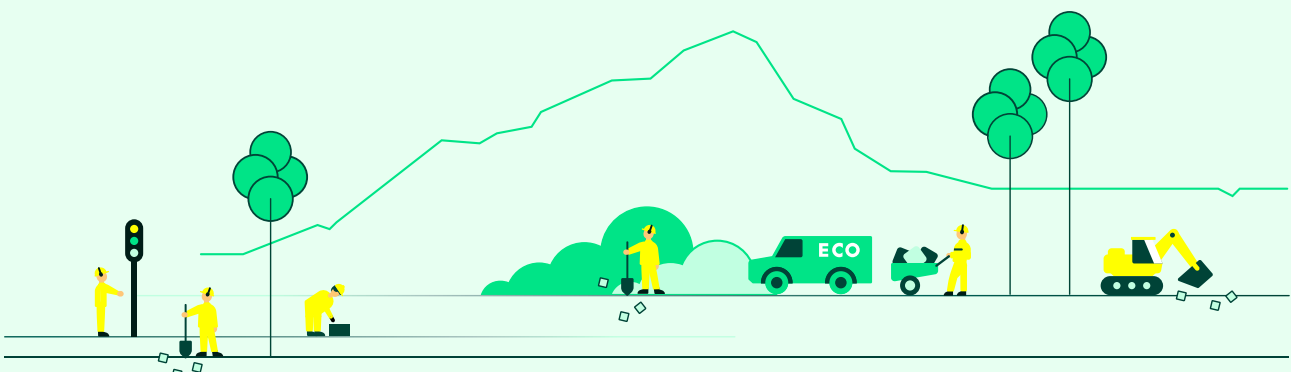


We also see clear opportunities to unlock positive biodiversity outcomes and improve environmental and social performance. Due to the nature of our business assuring a safe and healthy working environment for our employees, sub-contractors and partners is our number one priority. Our focus is not only on reducing the risks in the workplace, but also on implementing preventive measures that contribute to our people’s health and well-being.

NRC Group is committed to the highest ethical business standards and respect for the inherent dignity of people and their inalienable rights. In working closely with our value chain and local communities, our due diligence approach ensures that we meet our human rights obligations and adhere to high social and environmental standards.

We believe we can develop business critical competences and skills through our training and development programmes, and by emphasizing diversity, we can create an inclusive and innovative workplace. All of these factors contribute to the sustainable solutions we are building every day, together with our partners and clients. The way we build human capital and develop our capabilities as a learning organisation is key to creating a common culture within the business, which is embedded in sound sustainability principles.

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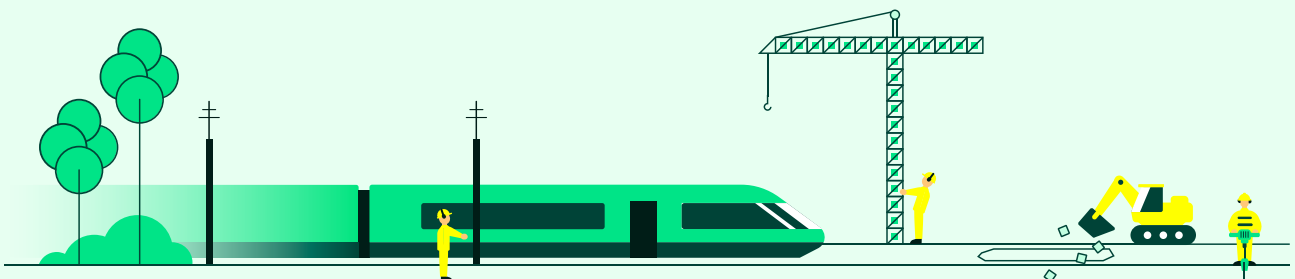


# Sustainability in action

**Our sustainability framework is based on our core competencies and most material impacts. These material impacts were identified in the materiality assessment undertaken in 2020 are reviewed annually. The framework sets out how we operate to achieve our sustainability targets, which contribute to the United Nations Sustainable Development Goals.**

The strategy is focused on six core impact areas:

- Building a low carbon future
- Improving environmental performance
- Providing a safe and secure workplace
- Emphasising diversity and equal opportunities
- Training and developing our people
- Ensuring ethical business practice











Our sustainability strategy is brought to life in our operations and the way we work every day.

We are actively building our sustainability competence as we develop our unique internal sustainability culture.

We set clear targets and aim to empower our customers and partners to reach theirs.

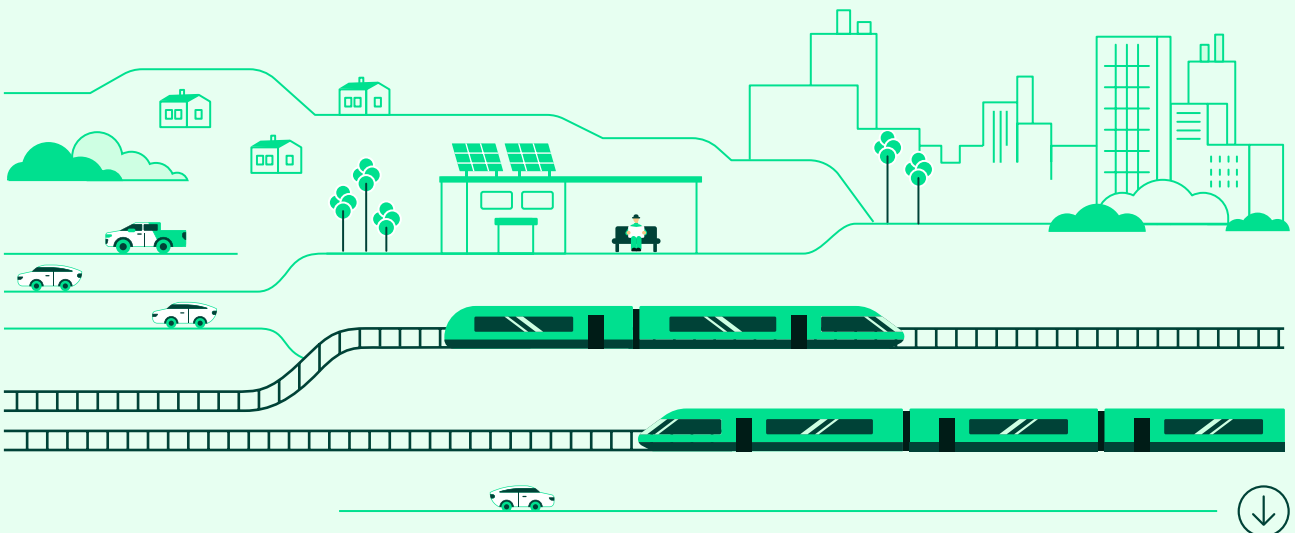
Environment	Social	Governance
<p><b>1 Building a low carbon future</b></p> <ul style="list-style-type: none"><li>Climate and emissions</li></ul>	<p><b>3 Providing a safe and secure workplace</b></p> <ul style="list-style-type: none"><li>Health and safety of our employees</li></ul>	<p><b>6 Ensuring ethical business practices</b></p> <ul style="list-style-type: none"><li>Ethical business practices</li><li>Sustainable supply chain (including human rights impacts)</li></ul>
<p><b>2 Improving environmental performance</b></p> <ul style="list-style-type: none"><li>Materials and recycling</li><li>Biodiversity impacts</li><li>Environmental impact and compliance</li></ul>	<p><b>4 Emphasising diversity and equal opportunities</b></p> <ul style="list-style-type: none"><li>Diversity</li></ul> <p><b>5 Training and developing our people</b></p> <ul style="list-style-type: none"><li>Training and development</li><li>Local community impacts</li></ul>	
 	 	 

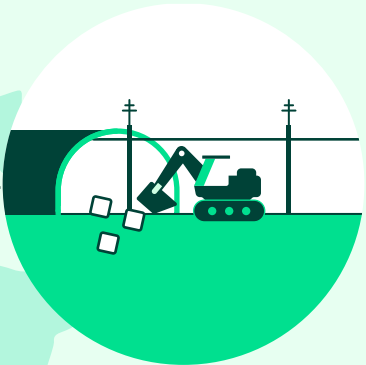
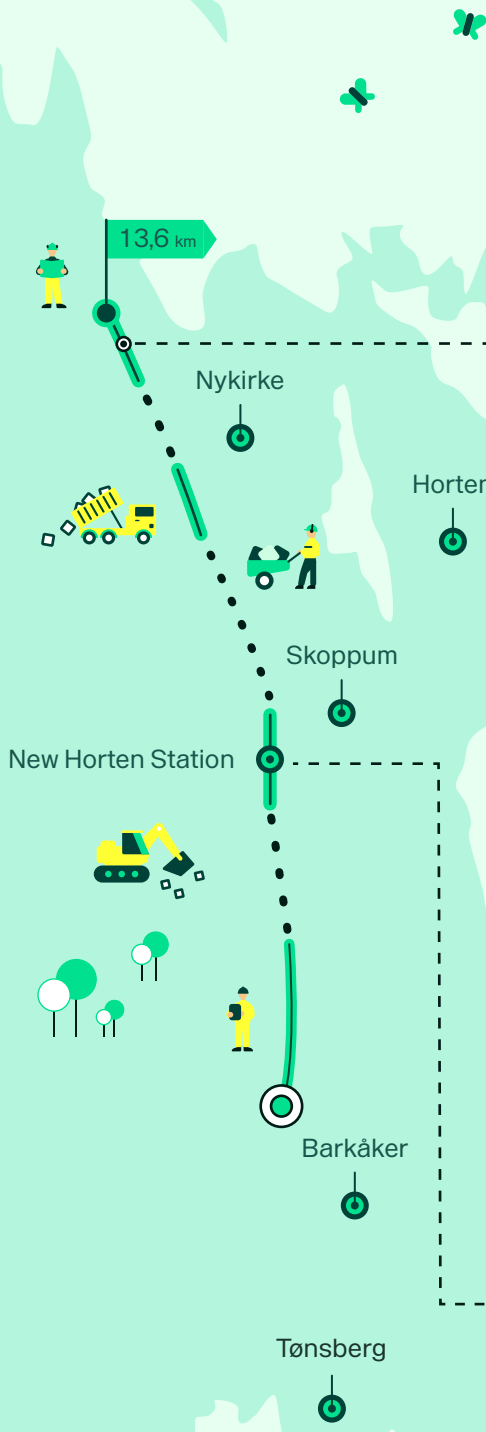
# Green investments on the Vestfold Line

**More trains, frequent and on-time departures, and better services will be the result when we finish the InterCity expansion of Nykirke-Bårkåker on the Vestfold Line.**

As part of the expansion of the Vestfold Line, we are constructing new double-tracks facilitating more trains and departures between Oslo and Tønsberg. This will provide a better and more efficient daily commute when the tracks open for traffic in 2025.

**Start:** 2019  
**Completion:** 2025  
**Client:** Bane NOR  
**Alliance partners:** Gunnar Knutsen AS & NRC Kept  
**Contract value:** 793 MNOK





### The Tangen Tunnel

Rehabilitating the Tangen Tunnel was our top environmental initiative on the Vestfold Line. Rather than constructing a new tunnel, we opted for renovation, resulting in significant cost savings of NOK 450 million during the planning stage. This underscores the importance of early decisions to minimize the environmental impact and to reduce emissions.

### Wildlife Crossing

We've built a wildlife crossing to make sure that wildlife in the area can cross the railroad safely. In addition, we've built culverts underneath the railway to ensure that frogs can move from one side of the railroad tracks to the other.



### New Horten Station

We've facilitated rooftop solar panels and several new EV chargers at New Horten Station. By drilling 133 energy wells below the parking area, we will use geothermal heating to melt snow.

### Focus on Circular Economy

The project is almost self-sufficient for stone material, except for ballast. However, the ballast is delivered by a local supplier, which contributes to the reduction of greenhouse gas emissions.



# The EU Taxonomy

**The EU Taxonomy is the EU's classification system developed to create a unified definition of sustainable activity. The intention is to scale up sustainable investments with a net positive climate and/or environmental impact.**

**The EU defines six environmental objectives associated with the EU Taxonomy:**

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection of water and marine resources
- The transition to a circular economy
- Pollution prevention and control
- The protection and restoration of biodiversity and ecosystems

**Substantial contribution and do no significant harm**

In order for an activity to be considered as sustainable according to the Taxonomy, it must contribute substantially to at least one of the six environmental objectives above, defined by technical screening criteria. In addition, the activity must “do no significant harm” (DNSH) towards the remaining five objectives and comply with minimum social safeguards (UN Guiding Principles including ILO core conventions and OECD guidelines). NRC Group has so far considered the environmental objective related to climate change mitigation. One highly important DNSH criteria for NRC Group is to meet the minimum 70% recycling rate for business activities.



**The EU Taxonomy reporting requirements**

In Norway, the Taxonomy framework entered into force on 1 January 2023 and applies to large listed companies with over 500 employees.

**NRC Group is reporting the following EU Taxonomy disclosures for 2023:**

- The share of Taxonomy-eligible economic activities in relation to total activities
- The share of Taxonomy-aligned economic activities in relation to total activities
- The Key Performance Indicators (KPIs) as defined in the Taxonomy related to turnover (revenue), operational expenses (OpEx) and investments (CapEx)
- Qualitative information relating to how the disclosures were calculated (see appendix).

**Eligible activities for NRC Group activities**

Of the Group’s activities in 2023, 98% are defined as eligible under the EU Taxonomy in terms of revenue. The most relevant eligible activities for NRC Group include infrastructure for rail transport and infrastructure enabling low-carbon road transport and public transport. The latter includes activities related to light rail and metro. Of the Group’s activities in 2023, 98% are defined as eligible under the EU Taxonomy in terms of revenue. The most relevant eligible activities for NRC Group include infrastructure for rail transport and infrastructure enabling low-carbon road transport and public transport. The latter includes activities related to light rail and metro. Most of these eligible activities meet the technical screening criteria, the do no significant harm criteria and the other requirements to be classified as Taxonomy-aligned.

As more activities have been defined in the EU Taxonomy during 2023, now also most of our activities related to the environmental and the civil construction business are considered eligible. However, most of these activities are currently not reported as aligned.

**70%**

**minimum recycling rate for business activities.**

**Taxonomy KPIs**

KPIs	Eligible	Aligned
Turnover (Revenue)	98%	72%
Operational expenses (OpEx)	99%	74%
Investments (CapEx)	98%	76%





The disclosed figures have not been audited. A full description of the calculation methodology is included in the appendix.

### Aligned activities for NRC Group activities

Of the Group's activities in 2023, 72% are defined as aligned under the EU Taxonomy in terms of revenue. On an overall level, the eligible activities that are not aligned relate to some of our maintenance work in Finland, where we cannot ensure a high enough recycling rate. Non-electrified rail, civil construction business and demolition work constitutes the remaining non-aligned activities. The disclosed figures have not been audited. A full description of the calculation methodology is included in the appendix.

The Key Performance Indicators (KPIs) is presented in a table below. Complete KPI templates according to EU's Annex II to the Disclosures Delegated Act are disclosed on [www.nrcgroup.com/sustainability](http://www.nrcgroup.com/sustainability).

**Of the Group's activities in 2023, 72% are defined as aligned under the EU Taxonomy in terms of revenue.**

As per 31 December 2023:

KPIs	Eligible		Aligned	
	2023	2022	2023	2022
Turnover (Revenue)	98%	87%	72%	67%
Operational expenses (OpEx)	99%	87%	74%	67%
Investments (CapEx)	98%	81%	76%	73%

# ENVIRONMENT

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# Building a low-carbon future

**NRC Group delivers long-term, low-carbon infrastructure solutions that create value now and for future generations.**

NRC Group is highly aware of our customer and stakeholder expectations on climate impacts, and of the likelihood of climate-related regulation. That is why, as a provider of services to build sustainable transport solutions, NRC Group is positioning itself to be the sustainable infrastructure partner of choice. Shifting our business to a low-carbon operation is a key priority.

The Paris Agreement (2015) and climate commitments of the Nordic countries in which we operate have sent a clear signal to private companies. Investor and stakeholder expectations around emission reductions are becoming urgent and unified. A general agreement on the need for net zero greenhouse gas (GHG) emissions by 2050 is being established, in an effort to limit global warming to less than two degrees Celsius.

### **30% reduction by 2025**

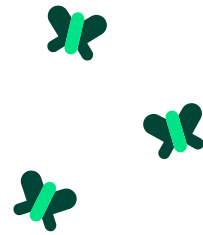
We have set a 30% reduction target for our GHG emissions by 2025, using 2021 as a baseline. We are committed to align our reduction efforts with the Paris agreement and have set the long-term goal of being net zero by 2050. We are continuing to investigate the setting of a science-based target (SBTi), including identifying and reporting a useful intensity factor which measures the carbon intensity of our operations on a relevant basis. As a part of this effort, and in line with the Finnish government's ambition of carbon neutrality by 2035,



our Finnish operations prepared a carbon roadmap during 2023. This carbon neutrality is based on the assumption that the carbon sink is -21 Mt CO<sub>2</sub>e in 2035. Our Swedish operations are also committed to the 2045 net zero target of the Swedish climate policy framework.

**Our GHG emissions increased in 2023**

Our total GHG emissions (scope 1+2+3) in 2023 amounted to 13,771 tonnes (2022: 13,051 tonnes) of carbon dioxide equivalents (t CO<sub>2</sub>e). This represents an absolute increase in our scope 1, 2 and measured scope 3 GHG emissions of 5.5%. A full and detailed breakdown of our GHG emissions by country, scope and source is provided in the appendix. The majority of the emissions measured in 2023 (scope 1 and 2), result from the use of diesel fuels in our equipment. A much smaller proportion of our emissions originate from electricity use at our offices and on some project sites. Overall, group level emissions increased in 2023, which puts NRC Group in an unfavourable position with regards to achieving the 30% emission reduction target. However, at country-level the situation varies a lot. Emissions in Norway increased significantly from last year, which was mainly due to the availability of data from sources not known before. This means that the actual emissions did not increase over the year even though the measured emissions did. Due to this change in measurement, we will revise our targets and



**GHG emissions baseline (t CO<sub>2</sub>e) scope 1 & 2**

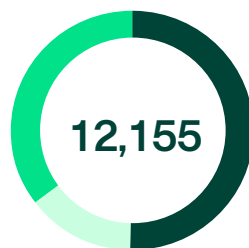
Total emissions (t CO<sub>2</sub>e)



**NRC Group total: 12,401**

■ Finland:	4,534
■ Norway:	6,117
■ Sweden:	1,749

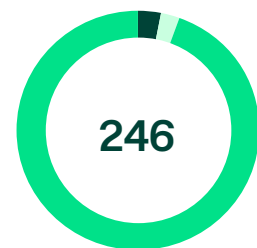
Scope 1



**NRC Group total: 12,155**

■ Finland:	4,303
■ Norway:	6,110
■ Sweden:	1,742

Scope 2



**NRC Group total: 246**

■ Finland:	232
■ Norway:	7
■ Sweden:	6,5



presentation of historical data in the coming year to provide a more accurate overview of our emissions reductions. We reduced our emissions in both Sweden and Finland during 2023, with Sweden looking likely to achieve a 30% reduction target.

We are working towards the publication of accurate scope 3 emission figures. Based on current available data, we see that emissions related to business travel have increased significantly in 2023. The increase from between 200 and 300 tonnes in 2022, to 1,369 tonnes in 2023 is mainly due to covid-restrictions on travelling being lifted.

**Disclosing climate-related financial risks using TCFD**

In 2023, we have reviewed and updated our disclosures on climate-related risks and opportunities, which include governance, strategy and risk management perspectives, including the metrics and targets we use. The review and update included how climate-related physical, transition and market risks may impact our business. A summary of our TCFD disclosures is included in the Appendix.

**We reduced our emissions in both Sweden and Finland during 2023.**



**Energy consumption**

NRC Group delivers long-term, low-carbon infrastructure solutions that create value now but also for future generations.

NRC Group is highly aware of customer and stakeholder expectations on climate impacts, and of the likelihood of climate-related regulation. That is why, as a provider of services to build sustainable transport solutions, NRC Group is positioning itself to be the sustainable infrastructure partner of choice. Shifting our business to a low-carbon operation is a key priority.

**Efficiency, biogas and electrification**

We are investing in initiatives to reduce our GHG emissions and improve efficiency, aiming for economic and productivity benefits associated with these investments. Our focus on the efficient operation of equipment is complemented by a transition to renewable biogas fuels and investments in electrification of suitable equipment.

We are reducing emissions by converting diesel machines to hybrids and are currently operating 50 (out of 78) trucks on renewable biogas. Over 70% of Gunnar Knutsen's (a wholly-owned NRC company) truck fleet is using the biogas and the company's mid-term ambition is to fuel their entire fleet on renewable biogas. This investment plays an important role in reducing energy use and contributing to NRC Group's target of reducing emissions by 30% by 2025. Being able to provide a low-carbon heavy transport fleet has strengthened our sustainability credentials and converted them into a contract-winning competitive advantage.

As the market and availability of electric-powered machinery develops, we will continue to consider replacing existing machinery and equipment with electrical options, where it is fit for purpose.





# Reducing emissions by converting diesel machines to hybrids

**How we execute our projects matters to us, and we are committed to operating safely while protecting the environment. To reduce emissions we aim to replace machinery with renewable fuel sources.**

Earlier this year, NRC Kept, a subsidiary of NRC Group rebuilt and modernized two large demolition machines, Caterpillar 352 and 340. The machines are originally diesel powered but are now being modified to become hybrid machines that can also run on electricity. One of them was ready for use during late 2023.

NRC Kept invests in electrical machines to reduce greenhouse gas emissions and noise from machinery. By replacing machines that operate solely on fossil fuels, we are contributing to a healthier, more environmentally friendly and safer workplace.



# Improving environmental performance

**Environmental regulations, contract conditions for environmental management and stakeholder expectations around environmental performance are increasing.**

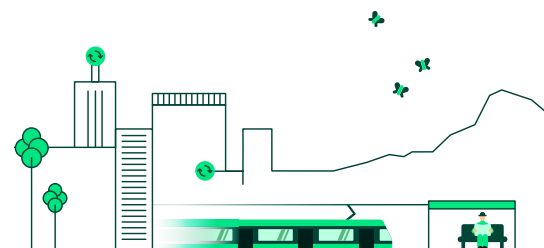
As a material topic, our approach to environmental management is guided by our environmental policies, which state that:

- All leaders shall promote environmental consciousness across the organisation, and all employees are required to assume responsibility for the climate, environment and society
- We shall work systematically to reduce our greenhouse gas emissions and waste.

**Certified to ISO14001 for environmental management**

Our Norwegian and Finnish operations are certified to ISO14001, the internationally recognised environmental management standard. Our Swedish operations have been working in preparation for this certification, and is expected to be certified before the summer of 2024. Our group-wide environmental policy sets out the core principles for environmental management and applies an ISO14001 management system approach across the entire business. A core feature of the ISO14001 Standard is the requirement to demonstrate continual improvements in environmental performance, year-on-year.

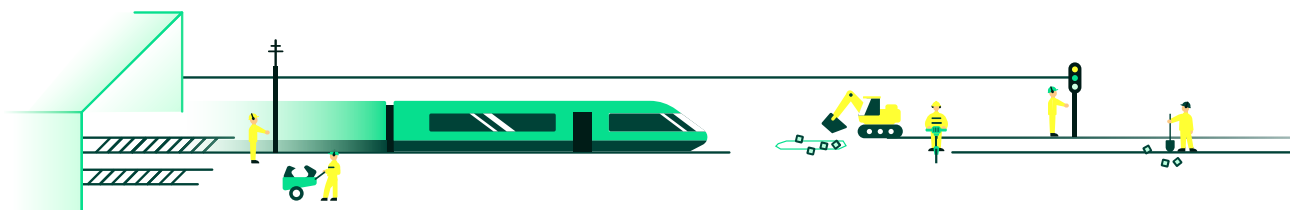
**Our Norwegian and Finnish operations are certified to ISO14001, the internationally-recognised environmental management standard. The Swedish operations is expected to be certified before summer 2024.**



**Responsible site management**

Some of our most visible environmental impacts occur on our work sites. Impacts such as noise, dust, vibration, emissions, soil and vegetation removal are all regulated and specified in our project contracts. We are meeting and exceeding these permitted environmental performance requirements, primarily through the implementation of NRC Group's environmental management system.

**0**  
**reported accidental  
spills in 2023.**



# Biodiversity and land degradation



## Contributing to positive biodiversity outcomes

The project sites that NRC Group works on are predominantly located in highly developed locations, such as in existing transport corridors and built-up urban areas. The baseline biodiversity values within these sites are relatively low, and in many cases are increased through remedial works and landscape plantings that form part of our projects. We see opportunities to contribute to positive biodiversity outcomes and actively monitor and protect biodiversity values at our project sites. This makes biodiversity a material topic for us.

## Managing our biodiversity impacts

Our project activities are governed by local authority permits, regulation and specific project or contractual conditions. Despite having a relatively low risk of biodiversity impacts because of the existing nature of our operating sites, our projects maintain site management plans, including how we monitor and protect biodiversity values.

Specific measures are taken where there are notable or vulnerable biodiversity areas on our sites, such as fencing off, creating buffer zones, remedial works and formal environmental impact assessments. We actively monitor and report biodiversity values and impacts on a project basis.

A number of our projects in 2023 took place in or adjacent to formally protected natural areas or areas of significant biodiversity value. These areas are typically nature reserves or habitats of protected species. Projects may also occur in locations classified as protected ground water areas. NRC Group always adheres to strict work activity permits, local environmental regulations and its own rigorous environmental protection protocols.

**NRC Group always adheres to strict work activity permits, local environmental regulations and its own rigorous environmental protection protocols.**



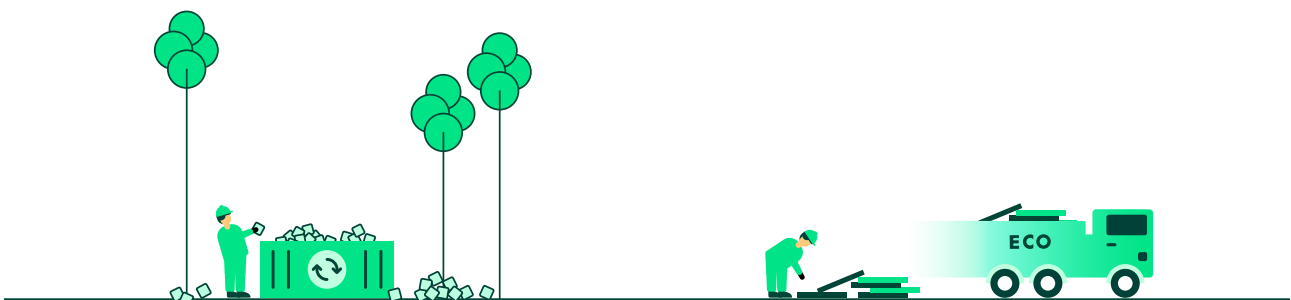
### Zero accidental spills

We believe that any spill is avoidable. That's why we have made significant investments in people, processes and equipment to eliminate spills. Our investment is paying off, with no reported accidental spills in 2023. We define an accidental spill as one where a harmful substance contaminates the environment and is likely to cause direct environmental impact. Minor and infrequent spills do occur in our operations, such as when a hydraulic hose pipe bursts on a machine. Where these spills are less than 250 litres and the affected area is immediately cleaned (usually through removal of any contaminated soil or vegetation), they are not reported as accidental spills. Our professional employees continue to deliver environmental improvements year-on-year, and by eliminating spills demonstrate their commitment to our environmental performance goals.

**We define an accidental spill as one where a harmful substance contaminates the environment and is likely to cause direct environmental impact.**

### Hazardous substances carefully handled

Alongside our approach to accidental spills, we have a set of formal processes and training for the handling of any hazardous substances. These are substances which if not handled correctly they could have potential significant human health and environmental impacts. In 2023, there were no reported incidents involving our handling and use of hazardous substances.





# Towards a circular economy

**Our project sites operate waste minimisation plans and have a goal of eliminating the creation of waste generated by the company in the first instance.**

Where unavoidable waste materials are generated, we investigate options for reuse and recycling. We have defined a minimum recycling target rate of 70% at all of our project sites and continue to pursue our zero waste ambitions at a Group-wide level. Ultimately, we aspire to operate our business in a circular economic model, where waste is designed out of the system. We realise there is still a long way to go on our circular economy journey and are committed to meeting the challenge.

**Group-wide recycling rate close to 90%**

In 2023, the total waste generated by the Group's operating activities was 75,711 tonnes (2022: 82,983 tonnes), with a recycling rate of 89% (2022: 94%). We see this generally as a positive development for the operations of NRC Group. We are still at a relatively high recycling rate, which means that our business model is largely circular. Yet, we are working to constantly reduce our impact in this area.

As is typical in the infrastructure and construction sector, the nature of waste materials generated by different projects and the recycling methods available at each project site are often different. Because of this and our different project-based activities, waste and recycling figures may vary significantly from year to year and between our countries of operation.

Recycling rate 2023

**89%**

2022: 94%





## Waste and recycling rate



	NRC Group	Finland	Norway	Sweden
Total amount of waste	75,711	15,173	58,475	2,063
Recycling rate	89%	94%	92%	82%



# Re-using masses

**“I think it’s great to experience that our client rewards the sustainable solutions and initiatives we implement”**

**Dennis Samuelsson,**  
 HSEQ expert in NRC Group Sweden

We build sustainable infrastructure, and how we do it matters. In the Lustån – Hedemora railway project, NRC Group Sweden reduced GHG emissions by 23%. The excavated surplus soils were re-used in a local project. This approach reduced the transport of materials significantly.

With the re-use and a more effective way of handling excavated materials, we reduced CO<sub>2</sub> emissions by over 162 tonnes. The client awarded us a climate bonus for this reduction.



# SOCIAL

# 04



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# Health, safety and wellbeing

**We are committed to providing a safe and secure workplace for all our employees, sub-contractors and partners.**

## **A safe and secure workplace for all our employees**

We are committed to providing a safe and secure workplace for all our employees, sub-contractors and partners. Our goal is that all employees, sub-contractors and partners shall return home every day completely free of injuries. Safety is embedded in everything we do, and our approach is formally set out in NRC Group's policy for health, working environment and safety. Building a health & safety first - company culture, rigorous adherence to regulations and fostering processes that minimize HSE-risks are of utmost importance in guaranteeing the safety and health of our employees.

## **Comprehensive approach to health and safety**

Ensuring safe workplaces and compliance with regulations across diverse projects at various phases brings its challenges. Many health and safety issues are subject to steadily changing framework terms and conditions, affecting our employees and subcontractor tradespersons, many of whom may be in and out of projects every day. Managing health and safety in this context is complex and requires a comprehensive approach, including training, management systems, monitoring, improvement observations, with regular internal and formal external review.



### Health and safety systems certified to ISO45001

NRC Group Finland and NRC Group Norway are certified to ISO 45001, the internationally recognised occupational health and safety management system standard. Through the ISO certified health and safety management system, NRC Group continuously carries out preventive measures to improve the working environment, including risk analysis, planning, training and safety inspections.

### Building a stronger HSE-culture

With multiple work sites across three countries, nearly 2000 employees and a wide range of operating activities, NRC Group is actively promoting a culture for how to observe and report on health, safety, environment and quality. To create awareness around this issue during 2023, operational health and safety was, as usual, included in our Sustainability Week.

Our people are our eyes and ears in the projects, and we aim to empower employees to be observant and report situations which could be made even more safe, reduce the risk of environmental impact or improve quality outcomes. It is now becoming standard practice to report and address minor deviations from our standard operating procedures, when relevant risk observations are registered.

We have invested in a reliable recording observations system, and the practice has now become a genuinely useful and functional part of the way we operate. Through recording observations and addressing them, we improve our risk management and highlight good practices. At the same time, recording observations is promoting a culture of openness and discussions, lessons learnt and is enabling continuous improvement.

Learning from all injury incidents is important. NRC Group systematically collects and analyses data through reports and investigations from all incidents. The aim is to identify where the company can implement additional guidelines and routines that work and prevent new incidents from happening. All key learnings from health and safety incidents are shared via company-wide communication channels.



### Measuring our safety performance

We measure the Group's lost time injury (LTI) frequency which is considered the most important KPI for safe work. The LTI frequency is defined as the number of injuries resulting in absence per million working hours. We also measure absence due to sickness - the number of working days per annum that employee illness causes them to be absent from work. We include our subcontractors in all our reporting of health and safety data.

### Our injury frequency decreased in 2023

Our LTI frequency was 5.6 in 2023, which is a reduction from the frequency of 6.0 in 2022. Subcontractors are included in these figures. We continued to maintain our record of zero serious or fatal injuries in 2023 (2022: 0). Sickness absence rate decreased slightly to 3.8 in 2023, down from 4.2% the previous year.

### Creating wellbeing at work

We work continuously to ensure that all employees experience job satisfaction and wellbeing, targeting zero sickness related to any work undertaken at NRC Group. A number of specific health and wellbeing initiatives have been created within different operating countries. These include regular employee dialogues, medical checks, access to health support services and occupational health care. We have established routines for closer follow-up of employees on sick leave, making necessary adaptations to facilitate their prompt return to work. Where required, referral to medical specialists is made that is covered by insurance. We also closely monitor overtime work in projects. This is to ensure we remain both legally compliant and are able to effectively manage workloads within our wellbeing framework.

### Lost time injury rate

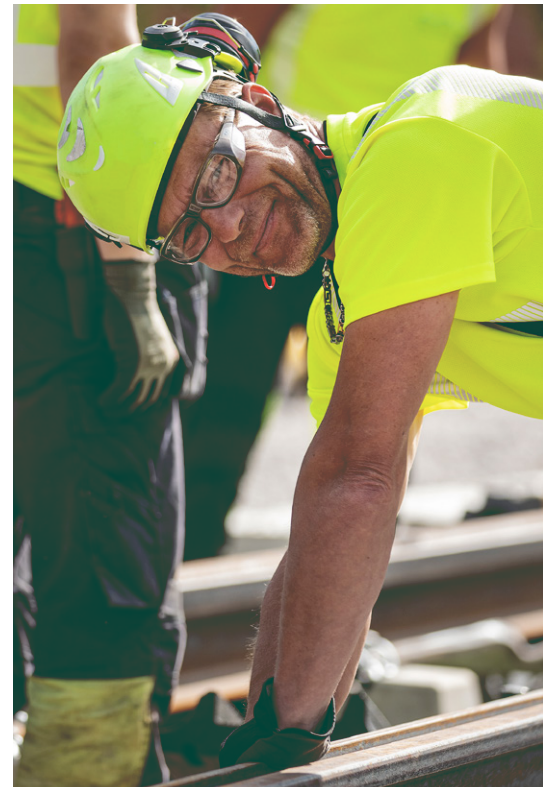
**5.6**

2022: 6.0

### Sickness absence rate

**3.8%**

2022: 4.2%





**Employee engagement survey**

#yourvoicematters is our biannual employee engagement survey, conducted every eighteen months. The survey plays a key role in our strategic efforts to cultivate and reinforce a shared culture and a robust internal brand. It’s an important tool to gain insight about our workplace on all levels of the organization. From the insights we learn what the right focus areas should be. By identifying what we do right and how we can improve, will enable us to prioritize actions that makes a difference for employees. In February 2023, the response rate was 83%.

Each year we also conduct #yourvoicematters Pulse survey. This is a snapshot of employee engagement and offer us real-time insight into the organisation’s health and employee engagement. The Pulse measure progress on our actions and helps us adjust if needed. In October 2023, the response rate was 72%.

How satisfied and motivated we are, is likely to influence our behaviour and performance.



**Engaged employees impact our performance through productivity, efficiency, customer experience, turnover and sick leave. Our leaders are trained in how to follow up on results by involving their team members in defining activities driving positive change, and over 80% of the entire organization participated in #yourvoicematters workshops. Empowering employees to contribute fosters collaboration and innovation, essential in today’s evolving landscape**

**Marianne Ulland Kellmer,**  
 EVP & Head of HR and Digitalisation

### **A single Group-wide HSE approach**

NRC Group has prepared Health, Safety and Environment (HSE) guidelines to establish a joint set of rules for safe work across the Group, including for subcontractors that work on our projects. With acquisitions of several companies in recent years, we have prioritized the establishment of a single groupwide HSE-culture from the same, single set of guidelines.

We have a set of guidelines for health, safety and work environment for our employees, hired staff and partners. Our handbook is available in Norwegian, Swedish, Finnish and English, and meets regulatory requirements in each country that we operate. It can be downloaded on each of our country web pages. To support the implementation of our health and safety program we also run an annual health and safety awareness week. During this week a number of high-profile communications, safety talks and company-wide focus activities are run to engage staff and embed health and safety practices.

### **Safe and fair working conditions for all employees**

Working conditions in Norway, Sweden and Finland are recognised globally as being well regulated. We work closely with employee representatives and trade unions to ensure a safe and fair working environment for all employees.

NRC Group upholds internationally-recognised human rights and labour standards as defined by the International Labour Organization's (ILO) fundamental conventions and the UN Declaration of Human Rights by acting responsibly in all areas of its business. We require our subcontractors and partners to follow applicable laws and regulations and use dedicated information management systems on our project sites.

NRC Group's ambition is to be the most attractive infrastructure partner and employer.



# Diversity and equal opportunity

**NRC Group acknowledges diversity and inclusion, and offers equal opportunities regardless of gender, age, sexual orientation, ethnicity, religion, political opinions or social background.**

We believe that diversity creates value. Being able to listen to and acknowledge different opinions, different backgrounds, experiences and perspectives, enables more effective corporate decision-making. A diverse workforce leads to diversity in thinking - a key driver for innovation and growth. Being inclusive makes business sense to NRC Group. Our commitments and requirements are in line with the Norwegian Equality and Anti-Discrimination Act. Specific reporting related to the Act will be made in the annual reports of the Group's Norwegian subsidiaries, as applicable.

**Progress on diversity and inclusion**

Progress has been made in promoting gender diversity within the company. The proportion of females in our workforce now sits at 10.7%. In a tight labour market attracting skilled and suitable candidates continues to provide challenges. It is promising to see that NRC Group is increasingly being viewed as an employer of choice that offers rewarding career options for men and women from diverse backgrounds.

**Promoting gender diversity at all business levels**

NRC Group operates in a male-dominated industry, which is reflected in the Group's overall gender composition, particularly among skilled workers. As of 31 December, NRC Group employed 1,853 persons (2022: 1,960) of which 10.7% were female (2022: 10.7%). Female representation in country leadership teams and top management is 42.8% (2022: 40.5%) and 57% (2022: 57%) on NRC Group's Board of Directors.

**Women in Board of Directors**

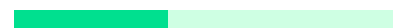
**57%**



2022: 57%

**Female senior management**

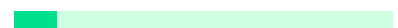
**42.8%**



2022: 40.5%

**Female employees**

**10.7%**



2022: 10.7%

# Training and development

NRC Group considers competence and knowledge development as important factors for building a shared company culture, as well as to attract and retain great people. We believe that by investing in our people we achieve a more skilled, loyal and effective work force. Our people's passion, dedication and expertise are essential for delivering high quality projects.

## **Building sustainability competence and leadership capability**

To achieve our sustainability goals and develop our people NRC Group has developed specific training programmes in sustainability and leadership. A total of 95% of all employees have now undertaken the company's sustainability certification course, up from 81% in 2022. The training programme builds a shared understanding of sustainability within the business and is a powerful driver of positive environmental and social performance, training in our leadership principles #howeal, we strengthen leadership roles to be visible and clear role models. The program is an enabler to reach strategic ambitions. Additionally, we have a mentoring program where pairs are blended from all three countries. In 2024, we will launch the Navigator program, where top talents will participate in a leadership program.

## **Providing pathways for interns and trainees**

Our recognised internship and summer trainee programmes provide a useful and fundamental career start for those wanting to build a career within the construction and infrastructure sector. While also part of NRC Group's recruitment drive, the programme serves to train and develop participants' understanding of the sector and the opportunities within it. In 2023, a total of 53 summer interns joined our programme.

**The sustainability training programme builds a shared understanding of sustainability within the business and is a powerful driver of positive environmental and social performance**

**At NRC group, we strive to give our interns relevant experience while being a student. It's also important learning for our more experienced employees, to bring in new perspectives and ideas.**

Our summer intern Oda Eline Brandtzæg Hope (24) worked during summer at the Holmenkollen project in Norway.

"I also worked here last summer and because I enjoyed it so much, so I applied again this summer. I benefitted from a wide range of experience, from casting concrete to maintaining safety for our workers. No two days is the same."



**My colleagues are very welcoming and helpful here. This internship is highly valuable for me, as I am interested in working with similar projects and in leadership roles in the future.**

**Oda Eline Brandtzæg Hope,**  
Summer intern 2023

# Working with our local communities

**As a large and specialized construction company we are acutely aware of the impacts and disruptions that our projects may cause in local and public areas.**

While these impacts and the way we operate are highly regulated, we believe there is an opportunity to proactively engage with local communities and impacted people, to achieve the best possible outcomes. Communication is key. But even more important is operating according to our core values – being caring, credible and entrepreneurial. This is why working with local communities is important to us and a material topic.

## **Informing and engaging our local communities**

Because of the nature of our work, many of our impacts at project sites are highly visible to the local community. These impacts may include noise, vibration, visual impacts, traffic and travel disruption, earthworks and vegetation removal. All of these impacts are regulated by local authority permits, regulation and specific contract conditions. We assess all potential impacts and proactively engage with authorities and the local community to find ways to minimise or mitigate them. Where required or useful, we develop communication plans to inform and engage local communities and affected people.

Our engagement occurs prior to, during and after the completion of our projects. We acknowledge, that in some instances, finding solutions that are ideal for all parties is not possible or practical. In these situations, we maintain open dialogue and seek to understand all counter party perspectives, including communicating the low carbon and

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**We assess all potential impacts and proactively engage with authorities and the local community to find ways to minimize or mitigate them.**



public transport benefits that our projects bring. We are open to learning and are continually updating our approach to how we work with our local communities.

**Monitoring community feedback**

A key measure of our impacts on local communities is the feedback we receive from them. In 2023, many of our projects had dedicated social media channels, where up to date information is provided to stakeholders and interactive feedback is managed. It has been positive to see how community interaction is developing through the use of such platforms, and we will continue to engage and build outreach using this approach.

We are also aware that many of our projects do not necessarily have such a high profile or level of community engagement because they occur in rural and less populated areas. At the same time, there are no doubt interested and affected stakeholders seeking information and ways to engage. We are committed to developing different approaches to community engagement which are fit for purpose and acknowledge this is a work in progress.



# Visit from UN Global Compact

**“It is great to witness the operation of a construction site, that is so forward leaning on environment and sustainability, and which shows that you can operate in an environmentally friendly, but at the same time economically and financially sound way”**

**Sanda Ojiambo,**  
Assistant Secretary-General  
of the UN Global Compact

In June, NRC Group Norway’s Managing director, Arild Moe, and Project manager, Tor Øyvind Andersen, had the pleasure of guiding Sanda Ojiambo, Assistant Secretary-General of the United Nations Global Compact, and her team around at Tryvann. Here we are building a water reservoir for Oslo Municipality. The main focus for the visit was our initiatives to reduce emissions and how we are taking care of nature and our surroundings while creating a positive impact for society.

Some of the environmental solutions chosen for the project include environmentally friendly concrete, emission-free machines, use of solar panels and reuse of excavated materials. According to Jukka Viitanen, Head of Sustainability at NRC group the Tryvann-project has saved 470 tons of CO<sub>2</sub>-emissions so far. This equates to 168 round-trip flights from Oslo to Bangkok or the equivalent of nearly 10 percent of all reported emissions from our Norwegian businesses.





# Creating a sustainable supply chain

**We see our suppliers as key partners in our business. Their success contributes to our success.**

We want to ensure that our suppliers meet the same environmental and social standards that we hold ourselves to. Many recent global and regional disruptions have also demonstrated that having a robust and resilient supply chain is crucial to maintaining business continuity. This makes the topic of supply chain sustainability a material one for NRC Group.

### **Establishing long-term supplier relationships**

We approach the management of our supply chain in two ways. Firstly, we actively select suppliers that align with our vision and values. This means they meet our expectations and requirements for health and safety, environmental performance and other relevant factors. Secondly, we seek to build meaningful and long-term relationships with our suppliers. In doing so, we establish trustful working relationships where we can learn and grow successfully together.

### **Investing in local businesses**

The majority of NRC Group's suppliers are Nordic owned and operated businesses. Our investment in local suppliers goes beyond the products and services they supply us with. We aim to actively engage with our suppliers to deliver environmentally sound solutions. To do this we work in partnership with our suppliers to challenge existing solutions, solve problems and increase knowledge in the ecosystem. This approach leads to enhanced



environmental performance for both parties. A similar focus is applied to quality, health and safety.

### **Human rights**

NRC Group is committed to ensuring respect for the inherent dignity of people and their inalienable rights as a fundamental part of its corporate responsibility, and as an essential requirement for conducting its business activities in any country or social environment. For this reason, NRC Group is committed to the UN Guiding Principles on Business and Human Rights (UNGPs). The Group views human rights as those rights recognised by the International Bill of Rights and the Core Conventions of the International Labour Organisation.

The Labour and Human Rights Statement of the Group covers UN Global Compact's Ten Principles, the UNGPs' "Protect, Respect and Remedy Framework", and International Labour Organization Conventions 87, 98 and 111. The Labour and Human Rights Statement is to be read in conjunction with NRC Group's Human Resources Policy and outlines the labour and human rights recognised by NRC Group to its employees irrespective of their role and the country in which they work, to its customers, and to the local communities where the Group operates.

### **Norwegian transparency act**

The Norwegian Transparency Act (Åpenhetsloven) came into force in July 2022. Companies which are covered by the act are obligated to carry out due diligence on their supply chain regarding fundamental human rights and decent working conditions. Companies will be required to perform due diligence annually and publish an account of their assessment. The due diligence undertaken must be in line with the OECD Guidelines for Multinational Enterprises. As a part of the due diligence process, companies must also implement suitable measures to cease, prevent or mitigate adverse impacts on human rights and decent working conditions, and assess their effectiveness. Companies are also required to respond, on request, for information on the subject from the public.

As an infrastructure company operating in the Nordics, NRC Group is exposed to a low level of human rights

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**As an infrastructure company operating in the Nordics, NRC Group is exposed to a low level of human rights risks and indecent working conditions in its own direct workforce.**

risks and indecent working conditions in its own direct workforce, with limited to increasing risks being present in its value chain – this predominantly relates to third party contractors through to the products it purchases.

In 2023, we improved reporting to be in line with the Transparency Act. We also conducted a gap analysis of our approach to human rights due diligence to identify potential areas for improvements. As a result, we identified our value chain being vulnerable for human rights issues, and therefore prepared sustainability requirements for our suppliers.

A formal Transparency Act Statement is made available on the Company’s website to meet the requirements to the law.

**A formal Transparency Act Statement is made available on the Company’s website to meet the requirements to the law.**





# GOVERNANCE

# 05



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# Ensuring ethical business practices

**NRC Group's business success is built on a foundation of trust. We believe that our business behaviour should reflect the highest ethical standards.**

Our long-term relationships with our customers and suppliers are where we demonstrate our commitment to ethical business practice. Actively reviewing and maintaining these high standards, makes ethical business practice a material topic.

## **Comprehensive ethics policy and compliance programme**

The Business Ethics and Code of Conduct Policy serves as NRC Group's primary governance document for ethical business practices. This policy is available on our website. The compliance programme focuses on priority ethics areas including anticorruption, anti-bribery, fair competition and supply chain integrity. Routines and systems for whistleblowing have been established in accordance with the Norwegian Working Environment Act.

## **Anti-bribery management system certified to ISO37001**

Since 2019, NRC Group Norway has been ISO 37001 certified, the internationally-recognised ISO standard for anti-bribery management systems. An annual risk analysis is undertaken as part of the certification process. NRC Group Norway was re-certified to the standard in 2023.

## **All managers have completed anti-corruption training**

The key features of the ethics compliance programme and whistleblowing system have been communicated



to all group employees. This has strengthened internal awareness about ethical issues, including application of NRC Group's policy on business ethics. Workshops and training have been conducted with all managers in Norway, Sweden and Finland to prepare them for handling ethical conflicts. The training includes how to identify and act in situations involving corruption, such as being offered private services or kickbacks.

### Whistleblowing

It is management's responsibility to ensure that whistleblowing reports are dealt with in accordance with NRC Group's formal whistleblowing directive. Following a whistleblowing report, any investigations and actions are considered on a case-by-case basis. NRC Group will, as soon as possible upon receiving a whistleblowing report, draw up a draft action plan. The plan may include the initiation of internal investigations and an assessment of sanctions in accordance with labour law legislation.

### Elevating whistleblowing reports

Any decisions to contact authorities, clients, contractors or other external third parties in case of an ethical breach are made by the legal counsel of NRC Group. If the matter concerns the legal counsel of NRC Group itself, or any of the legal counsel's superiors, an independent reporting channel may be used. In matters that could have significant consequences for NRC Group, the legal counsel will confer with the chairman of the board before contacting external parties and will generally keep the chairman of the board informed of the facts of the case. All employees, as well as contracted workers in NRC Group, who report irregularities in good faith, are actively protected against any kind of retaliation.

### 15 whistleblowing reports were received in 2023 – 0 elevated

15 whistleblowing reports were received in 2023. The reports were followed up in accordance with NRC Group's formal whistleblowing process and the Business Ethics and Code of Conduct Policy. Following investigation, no reports were elevated for further action.

### Whistleblowing reports received in 2023

# 15

2022: 6



# APPENDIX

# 06



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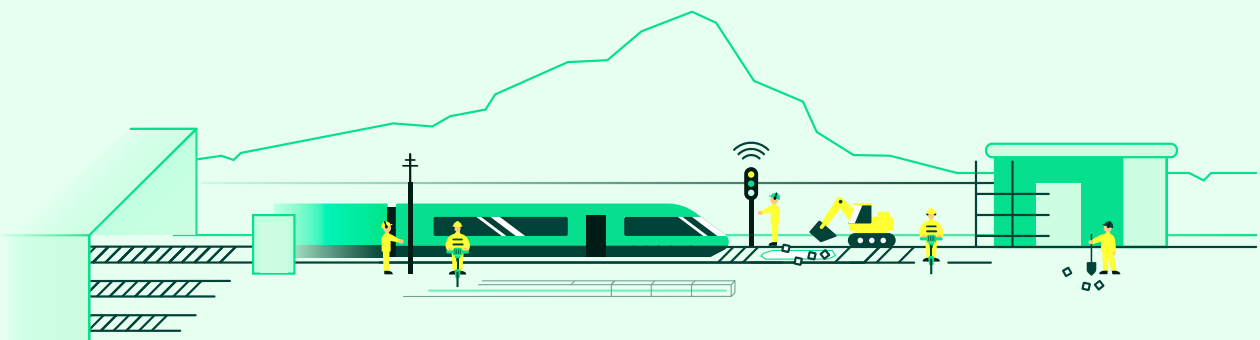
# Materiality assessment

## We used the GRI Standards to identify and assess our material topics

In 2020, we completed a comprehensive materiality assessment. Through ongoing stakeholder dialogue and independent review, we've updated our list of material topics annually using the GRI 3 Materiality Standard. Our annual materiality review includes consideration of stakeholder views and incorporates all current and planned regulatory changes.

We have continued to identify and assess the significance of our impacts, and in 2023, we adjusted the definition and names of some material topics, in preparation for alignment with the upcoming European Corporate Sustainability Reporting Directive (CSRD). While some names and definitions of our material topics may have been adjusted in 2023, there are no changes to the specific ESG impacts we consider material or how we measure our performance in relation to those impacts.

In 2024 we will undertake a comprehensive double materiality assessment, following the EU Sustainability Reporting Standards (ESRS) which encompasses both the impact and the financial materiality of ESG topics.





# Stakeholder engagement

**Stakeholders are engaged both formally and informally, in ongoing dialogue.**

Our stakeholders include existing and potential employees, investors, customers, end-users of our projects, local communities where we operate and unions. In 2020, we engaged an independent ESG consultant to carry out formal stakeholder interviews, a staff survey and an independent assessment of our material topics. Responses from the interviews, survey and an analysis of the topics raised were presented to our Board of Directors who approved the material topics to report. Since then, we have maintained ongoing dialogue with our key stakeholders. Their feedback has been incorporated into an independent review of our material topics on an annual basis. Stakeholder feedback has validated our existing material topics and led to the addition of the two new topics in 2021 - biodiversity and community impacts; and, in 2022 resulted in specifying human rights impacts as part of our Sustainable Supply Chain topic.



# Our material topics

Based on our annual review of impacts, the following topics have been determined to be material for our 2023 Sustainability Report:



## Environment

- Climate change mitigation
- Energy consumption
- Biodiversity and land degradation
- Resources and waste

## Social

- Own workforce
- Our value chain
- Local community



## Governance

- Ethical business
- Whistleblowing



## Impacts and ESG topics identified through stakeholder engagement

### Environment

Accidental spills	Ensure effective procedures to minimize the risk of accidental spills and discharges.
Adaptation to climate change	Understand and manage the risks that arise from climate change, e.g. physical changes (extreme weather, damage to assets, changes in resource availability) and changes related to climate related regulation, market preferences and technology.
Management of greenhouse gas emissions	Manage and reduce greenhouse gas emissions (CO <sub>2</sub> equivalents) from operations.
Management of other air emissions	Manage and reduce other emissions to air (e.g. SO <sub>x</sub> , NO <sub>x</sub> ) from operations.
Energy management	Manage the planning and operation of energy consumption within own operations. Seek to optimize energy consumption (e.g. fuel, electricity etc.).
Water management	Ensure effective procedures for water usage and discharge.
Waste management	Ensure effective procedures for waste collection, transportation, disposal and recycling. Correct handling of contaminated masses.
Hazardous materials and chemicals	Reduce the use of hazardous materials and chemicals in production processes and ensure correct handling (e.g. creosote, asbestos).
Soil and biodiversity management	Minimize negative impacts on natural biodiversity and eco-systems during the construction period. Particularly in areas of high biodiversity value.
Resource management	Minimize the use of resources through optimized design, project planning and operations.

### Opportunities and positive impacts

Circular economy in the construction industry	Apply circular solutions (e.g. upcycling of materials) in design of assets and procurement of items. Re-usage or donation of items.
Green services or products	Invest in R&D and innovation for new (green) technology, services and products and explore green market opportunities in new segments (e.g. electricity or hydrogen infrastructure in harbours).

## Social

Employee health & safety	Work systematically to achieve zero harm to all personnel. Ensure safe working conditions.
Diversity and equal opportunity	Ensure equal pay, equal treatment and no discrimination based on age, gender, culture, religion, sexual orientation, or disabilities in the organisation.
Labour rights	Ensure employees' right to organize, form and join labour unions and bargain collectively.
Employee training and development	Enhance skills and acquire new knowledge through employee training and education. Ensure a sufficiently skilled workforce and include apprentices in the workforce.
Local employment	Contribute to local economic growth by contracting local suppliers.
Community impact	Manage the social impact of operations on local communities: Engage with local residents, landowners and businesses that are impacted by the operations to reduce negative impact (local pollution, noise, vibrations, access etc.).
End-user safety	Ensure a safe end-product. Perform safety evaluations and work systematically to identify potential hazards.

## Opportunities and positive impacts

Charity & sponsorships	Engage in charitable activities and contributions, i.e. sponsorships and donations.
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## Governance

Anti-corruption and anti-competitive behaviour	Manage the risk of bribery, facilitation payments, money laundering (AML), and corruption of any kind. Ensure no unlawful cooperation and undue use of market power.
Whistleblowing and grievances	Ensure that whistleblowing systems and grievance mechanisms are in place and used properly.
ESG governance	Ensure dedicated ESG governance through processes and control mechanisms. E.g. integrate ESG into risk management, incentive systems and top management and board competence.
Responsible procurement of materials	Ensure effective management of ESG-issues in the supply chain (e.g. deforestation, energy efficiency, conflict minerals, forced labour).
Responsible subcontractor management	Define ESG-requirements for subcontractors and ensure subcontractor compliance (e.g. labour rights and safe working conditions, fair salaries, working skills, corruption, environmental standards).
Transparent public engagement	Be transparent concerning political lobbying and advocacy work, conflicts of interest and business relations.

## Opportunities and positive impacts

Green finance	Identify solutions and projects that meet requirements for sustainability-linked loans or green bonds, ensure access to institutional investor funds with "green" requirements.
Raising industry standards on sustainability	Collaborate with peers, customers and suppliers to ensure high sustainability standards throughout NRC Group's value chain and in the industry in general.
Standards and certifications	Follow voluntary environmental standards to achieve environmental labelling or certifications.

## GHG Emissions statement 2023

Scope group total	Quantity	Unit	Type	CO <sub>2</sub> e Emissions (kg)
<b>Scope 1 – Fuel consumption related to:</b>	259 368	Litre	Gasoline	560 234,8
Transportation (Yellow machines, trucks, excavators, dumpers, aggregates etc.)	4 242 694	Litre	Diesel	10 889 876,3
Company cars (fuel paid by NRC Group)	261 148	Litre	Light fuel oil	676 373,4
	768 686	Litre	Biodiesel HVO	27 349,9
	1 492 344	Tonnes	Biogas	1 819,45
Oil boilers etc.	-	-	-	-
<b>Total Scope 1</b>				<b>12 155 654</b>
<b>Scope 2 – Electricity and district cooling/heating:</b>				
Purchased electricity				
District heating				
District cooling				
<b>Total Scope 2 Location based</b>				<b>-</b>
Purchased electricity- no guarantee of origin (offices)	1 231 051	KWh		77 156,00
Purchased electricity - guarantee of origin	1 231 428	KWh		67 356,13
District heating	633 871	KWh		100 975,23
District cooling	-	KWh		-
<b>Total Scope 2 Market based</b>				<b>245 487</b>
<b>Scope 3 – Indirect (data from third party)</b>				
Business air travel (CO <sub>2</sub> directly from agent OR mileage)	386 949	km/kgCO <sub>2</sub>		1 224 210,00
Company cars	3 294 324	km		145 490,01
Purchased goods and services (light fuel oil)				-
<b>Total Scope 3</b>				<b>1 369 700</b>

<b>Scope Norway</b>	<b>Quantity</b>	<b>Unit</b>	<b>Type</b>	<b>CO<sub>2</sub>e Emissions (kg)</b>
<b>Scope 1 – Fuel consumption related to:</b>	32 163	Litres	Gasoline	69 472
Transportation (Yellow machines, trucks, excavators, dumpers, aggregates etc.)	2 541 201	litres	Diesel	6 022 646
Company cars (fuel paid by NRC Group)	453 767	litres	Biodiesel	16 145
	1 492 344	kg	Biogas	1 819
Oil boilers etc.	-	-	-	-
<b>Total Scope 1</b>				<b>6 110 083</b>
<b>Scope 2 – Electricity and district cooling/heating:</b>				
Purchased electricity				
District heating				
District cooling				
<b>Total Scope 2 Location based</b>				<b>-</b>
Purchased electricity- no guarantee of origin (offices)	313 695	kWh		6 520,00
Purchased electricity - guarantee of origin				
District heating	147 658	kWh		656,15
District cooling				
<b>Total Scope 2 Market based</b>				<b>7 176,15</b>
<b>Scope 3 – Indirect (data from third party)</b>				
Business air travel (CO <sub>2</sub> directly from agent OR mileage)	6 014	km		718 100
Company cars	1 022 930	Km		9 206
Purchased goods and services				
<b>Total Scope 3</b>				<b>727 306,4</b>

<b>Scope Sweden</b>	<b>Quantity</b>	<b>Unit</b>	<b>Type</b>	<b>CO<sub>2</sub>e Emissions (kg)</b>
<b>Scope 1 – Fuel consumption related to:</b>	100 482	litres	Gasoline	217 041
Transportation (Yellow machines, trucks, excavators, dumpers, aggregates etc.)	802 886	litres	Diesel	1 525 483
Company cars (fuel paid by NRC Group)	3 822	litres	Biodiesel	135,99
Oil boilers etc.	-	-	-	-
<b>Total Scope 1</b>				<b>1 742 661</b>
<b>Scope 2 – Electricity and district cooling/heating:</b>				
Purchased electricity				
District heating				
District cooling				
<b>Total Scope 2 Location based</b>				<b>-</b>
Purchased electricity- no guarantee of origin (offices)				
Purchased electricity - guarantee of origin	398 016	KWh		3 184,1
District heating	83	MWh		3 336,1
District cooling				
<b>Total Scope 2 Market based</b>				<b>6 520</b>
<b>Scope 3 – Indirect (data from third party)</b>				
Business air travel (CO <sub>2</sub> directly from agent OR mileage)	125	tonnes CO <sub>2</sub>		125 300
Company cars	401 960	km		24117,6
Purchased goods and services				
<b>Total Scope 3</b>				<b>149 418</b>



<b>Scope Finland</b>	<b>Quantity</b>	<b>Unit</b>	<b>Type</b>	<b>CO<sub>2</sub>e Emissions (kg)</b>
<b>Scope 1 – Fuel consumption related to:</b>	126 723	litres	Gasoline	273 722
Transportation (Yellow machines, trucks, excavators, dumpers, aggregates etc.) Company cars (fuel paid by NRC Group)	898 607	litres	Diesel	3 341 747
	261 148	litres	Light fuel oil	676 373
	311 097	litres	Biodiesel	11 069
Oil boilers etc.				
<b>Total Scope 1</b>				<b>4 302 911</b>
<b>Scope 2 – Electricity and district cooling/heating:</b>				
Purchased electricity				
District heating				
District cooling				
<b>Total Scope 2 Location based</b>				<b>-</b>
Purchased electricity- no guarantee of origin (offices)	917 356	KWh		70 636
Purchased electricity - guarantee of origin	833 412	KWh		64 172
District heating	486 130	KWh		96 983
District cooling				
<b>Total Scope 2 Market based</b>				<b>231 791</b>
<b>Scope 3 – Indirect (data from third party)</b>				
Business air travel (CO <sub>2</sub> directly from agent OR mileage)	380 810	km		380 810
Company cars	1 869 434	km		112 166
Purchased goods and services (light oil fuel)				
<b>Total Scope 3</b>				<b>492 976</b>

## TCFD Disclosures

### Governance

Describe the board's oversight of climate-related risks and opportunities.	Risks are reviewed regularly in the Board meetings. Climate risks are not discussed separately but may fall under other types of risks (i.e., market changes). The board has a five-year horizon for risk governance.
Describe management's role in assessing and managing climate-related risks and opportunities.	Project risks, including potential climate related risks, are reported monthly to management. Risks, including climate risk, are reviewed prior to tender submission and approved by management.

### Strategy

Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	See table following (Risks and Opportunities).
Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	Strategic business plans are based on the 12-year national transport plans of Norway, Sweden and Finland, outlook in adjacent markets, various consultancy reports and NRC Group's own expertise. Market demand and technology development is generally steady, and no rapid shifts are expected. Certain clients have stricter requirements or expectations about ESG and climate risk management than others. NRC Group is capable of meeting these requirements.
Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	The foundation of NRC Group is to capitalize on an increasing demand for maintenance and construction of low carbon infrastructure and it is thereby well positioned for the transition to a low carbon economy. Specific scenario analysis has not been undertaken at a group level, although a range of climate scenarios are factored in by clients at the individual project level.

## Risk management

Describe the organization's processes for identifying and assessing climate-related risks.	<p>Procedures in place for identifying and managing climate-related risks in tenders and in projects:</p> <ul style="list-style-type: none"> <li>• In the tender phase risks (including climate risks) are identified and cost allowances made.</li> <li>• During project execution, risks (including risks related to extreme weather) are incorporated in the projects' risk assessments.</li> </ul>
Describe the organization's processes for managing climate-related risks.	Risks (including climate-related risks) are managed as part of the tender process or directly in projects. There is no separate procedure for managing climate-related risk at a group level.
Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Climate-related factors are taken into consideration in tenders and projects. Generic risks are managed at group level through an enterprise risk management system. Processes exist at country and project levels for the identification, assessment and management of climate-related risks.

## Metrics and targets

Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Building low carbon infrastructure is the core business activity and opportunity for the group. Specific metrics have not been developed yet to assess climate-related risks and opportunities.
Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	GHG emissions have been reported annually since 2020 (Scope 1 & 2). See GHG disclosures in this report.
Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Specific metrics have not been developed yet to assess climate-related risks and opportunities.

## Physical risks

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- NRC Group's operations are exposed to more extreme weather – both acute and long-term weather changes. Heavy snowfalls or in other cases less snow, more frequent storms, soil, mud race, flooding and increased air temperature will impact NRC Group's operations in different ways e.g. increased temperatures leading to shorter time slots for welding (due to high air temperatures) causing higher costs or delays if not accounted for in tender pricing processes.
- For employee safety: No new risks and raising awareness in work processes.
- NRC Group owns few physical assets that may be damaged by extreme weather. However, the creosote facility in Finland may be impacted by more extreme weather like heavy rain or flooding. This could increase the risk of chemical spills. The probability of spills associated with the creosote facility is considered to be low.
- Other supply chain and logistics risks are considered low, as input factors are mostly local materials and client provided items.

## Physical opportunities

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- More extreme weather can be an opportunity for NRC Group. In case of infrastructure breakdowns, additional reparation and construction work would be required and the demand for infrastructure services would likely increase.

## Regulatory risks

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- The main regulatory risks are changes in requirements concerning emissions from fossil fuel, waste management and usage of materials (upcycling, recycling etc.) and potential increased costs if not planned/managed well. The regulatory requirements currently differ from country to country. This however is expected change through more widely adopted EU regulations.
- As imposed rules and regulations would likely be the same for all players in the market, NRC Group does not consider regulatory risk as high.

## Regulatory opportunities

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- Stricter GHG regulations will most likely move people and goods away from fossil fuel transportation over to low carbon solutions like railway and light rail.
- Political strategies and regulations of concentrating the population around "hubs" will also favour transportation by rail.

## Market risk

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- Market risk in terms of demand for rail infrastructure is considered low. There is a political consensus in all the three countries that transportation of people and goods by rail needs to increase. This is reflected in the countries' approved transportation plans. There is also a significant lag of rail infrastructure that needs to be upgraded.
- NRC Group does not expect a decrease in demand for railway services due to competition from electrical trucks nor electrical ferries.
- Market risk in terms of demand for civil constructions is also considered low. Civil constructions are still expected to play an important part in coming infrastructure projects.
- Lower financial cost could be expected for investments in equipment with zero emission.

## Market opportunities

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- High demand for NRC Group's key activities due to need for more resilient infrastructure and transition to a low carbon economy.
- Opportunity to attract green capital and impact investors.
- Several business opportunities related to physical climate change and the transition to a low-emission economy.
- Rehabilitation of smaller dams
- Electrification of harbour/terminal infrastructure
- 98% of the Group's activities in 2023 in terms of revenue is estimated as eligible under the EU Taxonomy.
- Civil works for "green" buildings, and other green infrastructure as defined by EU Taxonomy.

## Technology risks

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- The main technology risk for NRC Group concerns the machine park if public or private customers introduce requirements related to fossil free construction sites. Inability to keep up with emission free technology developments may in the future disqualify NRC Group from tenders or lead to losing tenders.

## Technology opportunities

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- Staying ahead of coming regulatory requirements, would be beneficial in tenders. i.e., having the ability to offer electric excavators.

## Reputational risks

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- NRC Group develops infrastructure for low carbon transportation and reputational risk is considered low.

## Opportunities

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- NRC Group will benefit from positioning the company as a provider of green solutions in terms of attracting talents and general goodwill.



# EU Taxonomy calculation methodology

**The main part of the Group's activities has been analysed on a project-by-project basis. For some parts of the business, including sale of materials, activities have been analysed on an item-by-item basis.**

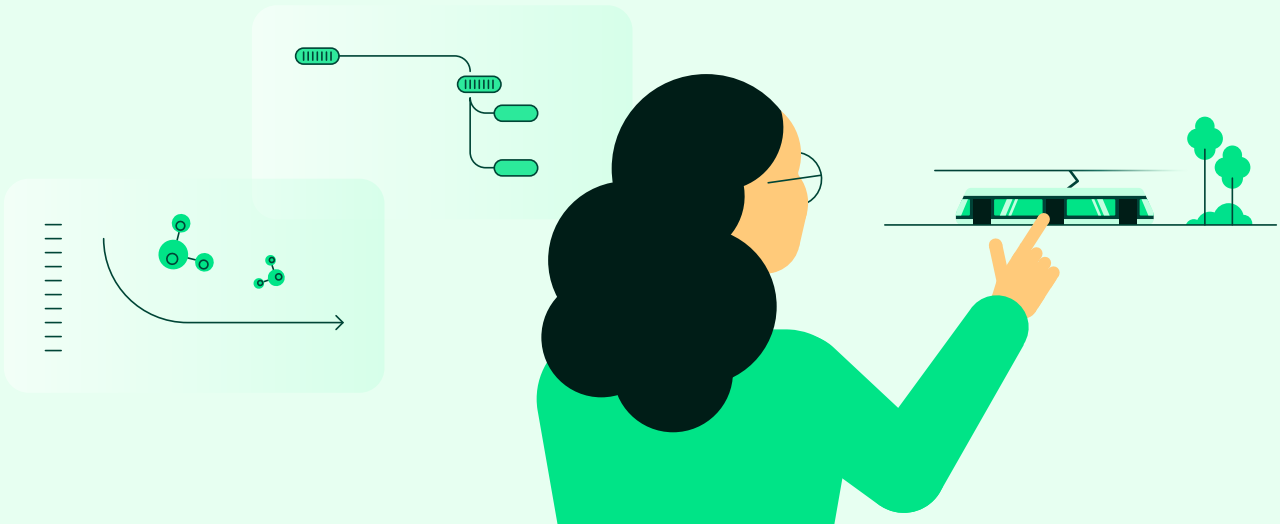
Each project or item has been analysed in relation to the activity definitions in the Taxonomy to conclude whether the activity or item is eligible. If the activity is eligible, a further investigation of the technical screening criteria and the do no significant harm criteria has been made. If the activity complies with all these criteria in addition to minimum social safeguards requirements, it is considered to make a substantial contribution to climate change mitigation and is hence being classified as Taxonomy- aligned.

The KPI related to eligible revenue has been calculated as the sum of all external revenue related to Taxonomy-eligible activities divided by the Group's total revenue. Aligned revenue has been calculated as the sum of all external revenue related to Taxonomy-aligned activities divided by the Group's total revenue.

The KPI related to eligible OpEx has been calculated as the sum of all OpEx related to Taxonomy-eligible activities divided by the Group's total OpEx. Aligned OpEx has been calculated as the sum of all OpEx related to Taxonomy-aligned activities divided by the Group's total OpEx. Based on the EU requirements, the Group has defined OpEx as operational expenses including depreciation and excluding overhead expenses.

The KPI related to eligible CapEx has been calculated as the sum of all Taxonomy-eligible CapEx divided by the Group's total CapEx, while the KPI related to aligned CapEx has been calculated as the sum of all Taxonomy-aligned CapEx divided by the Group's total CapEx. The Group has defined total CapEx as the sum of new additions to the fixed assets register and new additions to the right-of-use assets.

Taxonomy-eligible CapEx are measured as either CapEx defined directly in the Taxonomy or alternatively CapEx used in Taxonomy-eligible activities. Taxonomy-aligned CapEx are measured as either CapEx directly defined as aligned in the Taxonomy or alternatively CapEx used in Taxonomy-aligned activities.



# Our contribution to the SDGs

**The United Nations’ Sustainable Development Goals (SDGs) were agreed by 193 UN member states in 2015, including by the three Nordic countries NRC Group operates in – Finland, Norway and Sweden.**

Each SDG includes measurable targets and indicators, with Governments of member states reporting on these to the UN.

A key component of the SDGs is the principle of collaboration for their achievement, including between Government, Civil Society and Business. NRC Group is focused on collaboration and contribution towards an initial core set of SDGs, while supporting the achievement of all SDGs. In 2021, NRC Group signed up to the UN Global Compact (UNGC) which sets out ten internationally-recognised principles for responsible business conduct. In 2022, the company participated in the Climate Ambition Accelerator which is a six-month program designed to equip companies with the knowledge and skills necessary to accelerate progress towards setting science-based emission reduction targets.

We believe that it is important to identify where we contribute and to what extent we deliver on relevant and specific SDG targets and indicators. The following table sets out our view on the core set of SDGs relevant to NRC Group and how these are linked with our material topics. It also gives an overview of our contribution to their achievement and our performance in relation to their specific targets and indicators.



## Targets and priorities

### 5.

**Achieve gender equality and empower all women and girls.**



#### Target

Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.

#### Indicator

5.5.2 Proportion of women in managerial positions.

#### Priority area

Emphasising diversity and equal opportunities.

#### Material topic

Diversity.

#### Contribution

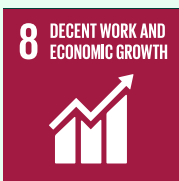
NRC Group has implemented an active recruitment approach targeting women in all roles and in internship programmes.

#### Performance

42.8% of managers in country leadership teams and top management are women (40.5% in 2022).

### 8.

**Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.**



#### Target

8.8 Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.

#### Indicator

8.8.1 Frequency rates of fatal and non-fatal occupational injuries, by sex and migrant status.

#### Priority area

Providing a safe and secure workplace. Training and developing our people.

#### Material topic

Health and safety of our employees.

#### Contribution

NRC Group has implemented a comprehensive health, safety and wellbeing programme, covering all employees and contractors working at its operational sites.

#### Performance

The LTI is 5.6 (6.0 in 2022) and there were two serious injuries in 2023 (0 in 2022).

# 9.

**Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.**



**Target**

9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.

**Indicator**

No relevant indicator.

**Priority area**

Ensuring ethical business practice.

**Material topic**

Ethical business practice.

**Contribution**

NRC Group builds high quality, reliable and low-carbon transport infrastructure solutions. These projects support equitable, accessible and affordable public transport. In 2023, NOK 7 billion worth of project work was delivered.

**Performance**

No relevant SDG indicator.

# 11.

**Make cities and human settlements inclusive, safe, resilient and sustainable.**



**Target**

11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.

**Indicator**

No relevant indicator.

**Priority area**

Ensuring ethical business practice.

**Material topics**

Ethical business practice. Local community impacts.

**Contribution**

NRC Group builds high quality, reliable and low-carbon transport infrastructure solutions. These projects support equitable, accessible and affordable public transport. In 2023, NOK 7 billion worth of project work was delivered.

**Performance**

No relevant indicator.



# 12.

## Ensure sustainable consumption and production patterns.



### Targets

12.4 By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment.

12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.

12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.

### Indicators

No relevant indicators.

### Priority area

Improving environmental performance.

### Material topics

Materials and recycling. Environmental impact and compliance. Sustainable supply chain.

### Contribution

All waste, hazardous substances and emissions related to NRC Group's activities are handled in accordance with domestic regulations, our environmental policy and in line with the formal environmental management system in Finland and Norway. This management system has been subject to an independent audit based on the internationally-recognised ISO14001 Standard. Substantial efforts to prevent, reduce, reuse and recycle waste materials have been made. A wide range of sustainability initiatives have been undertaken throughout the Group and the results are transparently reported in this annual sustainability report. The recycling rate for NRC Group in 2023 was 89% (94% in 2022).

### Performance

No relevant SDG indicators. See this report for reporting a range of indicators relevant to NRC Group.

# 13.

## Take urgent action to combat climate change and its impacts.



### Target and Indicator

No relevant targets or indicators.

### Priority area

Building a low carbon future.

### Material topic

Climate and emissions.

### Contribution

NRC Group builds resilient low-carbon transport infrastructure solutions. NRC Group has established a greenhouse gas (GHG) emissions baseline and has defined reduction targets.

### Performance

No relevant SDG indicators. See the report for reporting on NRC Group's GHG emissions.

## GRI Index

GRI Disclosure		Reference
2-1	Organisational details	<a href="https://www.nrcgroup.com/about-us">https://www.nrcgroup.com/about-us</a>
2-2	Entities included in the organisation's sustainability reporting	See Annual Report <a href="https://nrcgroup.com/investor/reports-and-presentations/">https://nrcgroup.com/investor/reports-and-presentations/</a>
2-3	Reporting period, frequency and contact point	January 1 - December 31, 2023. Annual. For questions and feedback on this report contact <a href="mailto:lene.engebretsen@nrcgroup.com">lene.engebretsen@nrcgroup.com</a>
2-4	Restatements of information	None
2-5	External assurance	The report has not been externally assured
2-6	Activities, value chain and other business relationships	<a href="https://nrcgroup.com/about-us/">https://nrcgroup.com/about-us/</a> and <a href="https://nrcgroup.com/projects/">https://nrcgroup.com/projects/</a>
2-7	Employees	Page 45
2-8	Workers who are not employees	None
2-9	Governance structure and composition	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-10	Nomination and selection of the highest governance body	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-11	Chair of the highest governance body	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-12	Role of the highest governance body in overseeing the management of impacts	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-13	Delegation of responsibility for managing impacts	Delegated to the CEO
2-14	Role of the highest governance body in sustainability reporting	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-15	Conflicts of interest	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-16	Communication of critical concerns	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-17	Collective knowledge of the highest governance body	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-18	Evaluation of the performance of the highest governance body	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-19	Remuneration policies	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-20	Process to determine remuneration	<a href="https://nrcgroup.com/investor/corporate-governance/">https://nrcgroup.com/investor/corporate-governance/</a>
2-21	Annual total compensation ratio	See Annual Report <a href="https://nrcgroup.com/investor/reports-and-presentations/">https://nrcgroup.com/investor/reports-and-presentations/</a>
2-22	Statement on sustainable development strategy	Pages 15-20
2-23	Policy commitments	Pages 32, 40 & 55
2-24	Embedding policy commitments	Pages 32, 40 & 55
2-25	Processes to remediate negative impacts	Pages 26-56
2-26	Mechanisms for seeking advice and raising concerns	Page 56
2-27	Compliance with laws and regulations	0 fines or legal breaches
2-28	Membership associations	The Confederation of Finnish Construction Industries RT, Finland Green Building Council, The Swedish Construction Federation Railway
2-29	Approach to stakeholder engagement	Page 59
2-30	Collective bargaining agreements	100% union membership

## GRI Index continued

GRI Disclosure		Reference
<b>Material topics</b>		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Pages 58-63
	3-2 List of material topics	Page 58
<b>Biodiversity</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 34-35
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Page 34
	304-2 Significant impacts of activities, products and services on biodiversity	Pages 34-35
<b>Emissions</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 27-30
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Pages 28 & 62-67
	305-2 Energy indirect (Scope 2) GHG emissions	Pages 28 & 62-67
	305-3 Other indirect (Scope 3) GHG emissions	Pages 62-67
<b>Waste</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 36-37
	306-3 Waste generated	Page 37
	306-4 Waste diverted from disposal	Page 37
<b>Employment</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 42-47
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Not reported

## GRI Index continued

### GRI Disclosure

### Reference

#### Occupational health and safety

GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 40-44
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Page 41
	403-5 Worker training on occupational health and safety	Pages 41-44
	403-6 Promotion of worker health	Pages 42-44
	403-9 Work-related injuries	Page 42
	403-10 Work-related ill health	Page 42

#### Training and education

GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 46-47
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Not reported

#### Diversity and equal opportunity

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 45
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Page 45

#### Local communities

GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 48-49
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Not reported
	413-2 Operations with significant actual and potential negative impacts on local communities	Not reported

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