

“At Trustly, our sustainability efforts are meant both to ensure the long-term success of our business in a changing economic environment, and to play an active role in shaping that future environment so it is happier and healthier for our society as a whole.”



## ADVANCING SUSTAINABILITY

### LOWERING CARBON EMISSIONS

As an online payment method, Trustly’s business model is digital by nature and has a relatively lower direct environmental impact than, for example, tech companies that produce hardware. Trustly’s Corporate Sustainability Policy covers the environmental issues that Trustly has identified as material to its business, including:

- Reducing CO<sub>2</sub> emissions from business travels
- Climate efficient data centers
- Climate efficient office facilities

Trustly is currently in the process of conducting a comprehensive greenhouse gas accounting of its operations. Trustly is also participating in the UN Global Compact’s Climate Ambition Accelerator to help set science-based targets to reduce emissions in line with the Paris Agreement.

As a tech Company, Trustly’s main environmental impact is indirect, caused by the energy consumption of the data centers that store our servers. Reliable and secure data centers are essential to the operations of the business. The data centers are hosted by two providers located in the Stockholm area of Sweden, Global Connect and Equinix, and are powered using 100 percent renewable energy.

Business traveling remains a large contributor to CO<sub>2</sub> emissions. Thus, Trustly vows to only embark on major trips while prioritizing digital forms of communication.



## STRENGTHENING DIVERSITY, EQUITY & INCLUSION

### INCREASING BOARD & MANAGEMENT DIVERSITY

In 2020, Trustly's Board of Directors was comprised of 29 percent women. Through our commitment to DEI, that has grown to 43 percent today.

### STRENGTHENING EMPLOYEE DEI

Trustly considers its people its most valuable asset. Having the best people results in high-performing teams that deliver the innovative products that are reshaping the payments landscape.

Trustly also believes that diversity drives innovation and results in products that are more inclusive. That's why Trustly is proud that its workforce is made up of more than 50 different nationalities.

Trustly follows these basic principles for equal treatment, as laid out in its Gender Equality and Diversity Policy:

- Trustly offers equal pay for equal work. There should be no unfounded differences in pay between men and women or for any reason such as ethnicity, religion, etc.
- Trustly offers equal terms of employment and working conditions for men and women.
- Trustly has zero tolerance regarding psychological harassment or harassment on the grounds of one's gender or other reasons such as ethnicity, religion, etc.
- Trustly has zero tolerance for sexual harassment.



## INVESTING IN COMMUNITIES

### DELIVERING IN TIMES OF CRISIS

To show its gratitude for frontline healthcare workers during the pandemic, Trustly donated hundreds of meals to healthcare workers around the world.

### EXPANDING EDUCATION & CAREER OPPORTUNITIES

In an effort to reduce hardware waste and also expand global educational opportunities, Trustly donates some of its older computers to [IT for Children](#), a nonprofit organization that provides young people in Ghana with access to computers to further their education.

### Personal Data Integrity

Trustly values customer protection and dedicates significant time to oversee security throughout the supply chain. To keep up with constant developments in data security, Trustly has a dedicated Chief Information Security Officer. Annual audits are also conducted on Trustly's systems to ensure all systems are secure.

Trustly values data privacy to the highest degree. The Company has many measures in place to ensure data protection, including adhering to multiple data protection laws and regulations, mandating all Europe-based employees take General Data Protection Regulation training, establishing a cross functional committee to evaluate all new IT solutions and 24/7 customer support.

Several measures are also in place to detect and protect users from cyberattacks as well as crime prevention. Annual anti-corruption and anti-bribery training must be taken by all Trustly employees.



## RESPONSIBLE LEADERSHIP

### ESTABLISHING & FOLLOWING RIGOROUS BUSINESS STANDARDS

Because iGaming operators represent a portion of its merchant base, Trustly works together with operators and their respective regulatory authorities to help ensure that their players play responsibly. Trustly maintains continuous interactions with local regulators, gaming authorities and legal counsels, and invests in third-party services providing country-by-country monitoring of iGaming and payments regulations. Trustly endorses the movement towards a more harmonized and clearly defined regulated market to the benefit of citizens and industry actors alike.

Trustly works with merchants and partners in ways that adhere to legal requirements and ethical standards. The Company has a clear policy in place to partner only with EU/EEA and US-licensed iGaming merchants. Trustly's gaming merchants go through three layers of control: supervising authority, their banks and Trustly. In addition, there are structures in place that enable Trustly to make further exclusions, including, for example, the Swedish Gambling Authority's list of prohibited operators.

### COMBATTING MODERN SLAVERY & HUMAN TRAFFICKING

Trustly recognizes and honors the right for every person to freely give his or her labor and for each employee to leave his or her employment. Trustly is committed to ensuring that it does not, directly or indirectly, make use of any work or service which is extracted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. Trustly takes a zero-tolerance approach to modern slavery and human trafficking. Should Trustly identify any modern slavery issues in its supply chain, the Company directly engages with that supplier to address any issues.