



# Sustainability report 2021

Striving to make a positive impact  
on people's life through games

# Driving a sustainable gaming business

Our purpose is to create a positive impact in our gamers' everyday life, through a social, entertaining, affordable, and positive gaming experience. Sustainability is therefore an integrated part of our business model and acquisition process. Stillfront's aim is to create a gaming universe that is digital, carbon-free, intelligent, equal, and sustainable. The target audience of our games are adults, aged 16 and above, as per their terms and conditions and their games are to be classified by the International Age Rating Coalition (IARC).

## Integrated part of our business model

Free-to-play games allow any gamer to access and experience a game independent of their ability and willingness to pay. When offering optional monetized content, our games only use fair and transparent methods.

For Stillfront, equality, diversity and inclusion are highly important in our games development process. Not only is the share of women who are playing games increasing, but there is also a demand for high-quality entertainment in multiple languages, adapted to different cultures, religions, and customs.

Gaming as entertainment should be a rewarding hobby, a great social experience, or a strategic challenge. As people spend more of their free time playing our games, it has become even more important to ensure that we are making a positive impact in people's lives. Stillfront as a group is responsible for securing that the content that we publish is in accordance with our values. Gaming needs to be a place where everyone feels welcome and included and this aspect plays an important part in new game development projects.

Stillfront operates in an industry that revolves around expertise and talent. To attract and retain the foremost talent in the industry, we need to offer an inclusive, equal workplace with high diversity.

Acquisitions are part of Stillfront's business strategy. Our due diligence process secures that potential acquisitions of new studios are structurally evaluated from a sustainability perspective and significant risks are identified. This evaluation process takes the form of discussions and interviews with the studio's management team, as well as due diligence of the studio's operations and governance process.

## Our sustainability strategy

Stillfront's sustainability strategy is a framework set up to focus our resources on the most relevant environmental, social and governance issues, drive performance and to engage internal and external stakeholders. The framework consists of Stillfront's material topics, targets, and objectives. Stillfront's material topics have been identified through interactive stakeholder dialogues, board and management discussions, peer benchmarking and industry best practices. The material topics reflect the key risks and opportunities that we focus on. These topics have not changed significantly from last year but environmental responsibility and social equality, diversity, and inclusion, have risen in importance.

When establishing this strategy, we considered several principles, regulations, standards, and guidelines, including for example the principles of the United Nations Global Compact, the EU Taxonomy, UN Guiding Principles on Business and Human Rights as well as OECD guidelines for multinational enterprises.

## GAMING FOR ALL

Objective:  
Make a positive impact through games

Target:  
Our games are to create a social, affordable, entertaining and positive gaming experience

Policy framework:  
Business strategy

Contribution to UN Global Goals:  
3.4 Promote well-being



Result 2021:  
64 million monthly active gamers enjoyed Stillfront's diverse portfolio of games, by the year-end of 2021.



United Nations  
Global Compact

During 2021 Stillfront became signatory of UN Global Compact, the world's largest corporate sustainability initiative.



## Stillfront's sustainability framework includes three pillars:

### GAMING FOR ALL

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We develop games that are fun, smart, and entertaining, and at the same time have a positive impact on people and society. We always try to make sure that gaming is not only a great social experience, but we also take responsibility for a safe, equal, and welcoming environment for everyone.

#### Material topics

- > Games for all
- > Diverse gaming content
- > Responsible gaming culture
- > User privacy and data security

Read more on page 14–16

### LIVING OUR VALUES

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Living our values is about how our culture supports us to conduct a responsible business and how we as a global group and platform can attract and develop the best game talents globally. Living our values cover our social responsibility in terms of for example equality, diversity and inclusion and employee well-being.

#### Material topics

- > Equality, diversity and inclusion
- > Employee engagement & wellbeing
- > Responsible business

Read more on page 17–19

### SMART RESOURCE USE

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For us, smart resource use is a given for the long-term prosperity of gaming and the planet. Our business is digital, and our largest emissions derive from the emissions of our players when playing our games. We strive to reduce our own emissions and offset the non-reducible emissions to make sure our games are carbon neutral.

#### Material topic

- > Carbon reduction

Read more on page 20–21

GAMING FOR ALL

# Games that reflect a diverse world

Stillfront believes in creating games and experiences for our global gaming community that reflects a diverse world. We celebrate diversity of thought, cultural differences, lifestyle, age, background, experience, religion, economic and social status, gender identity and marital status. In our games, we create a diverse range of characters and avoid gender stereotyping. In places where our gamers can create their own characters, we aim to offer diverse options.

### Diversified portfolio and geographical presence

We offer a diversified portfolio of games that attract different types of gamers although always an adult target audience. Stillfront's portfolio of games has grown into an exciting and vibrant ecosystem of more than 64 million gamers in 2021.

During 2021, Stillfront's studios worked on more than 40 game development projects. New game development projects spanning over all three genres (Simulation, RPG & Action, Casual & Mash-up and Strategy), attracting diverse audiences.

In 2019, we initiated a strategic focus to further diversify our portfolio of games and end users. Our objective is to increase diversity in gaming content, and our target is that new games introduced or developed, should strive to increase diversity in the game portfolio. During the last two years, we have acquired the studios Storm8, Nanobit and Super Free Games, that all have women as their primary target audience, complementing our previous portfolio which had a larger focus on a male population playing primarily strategy games.

In 2021, we increased our geographical presence with our acquisition of Jawaker that further strengthened our position in the MENA region and among the Arabic speaking population. With the acquisition of Moonfrog Labs, we entered the Indian subcontinent. The gaming population in the Indian subcontinent socialize through playing card and board games and the games create social platforms with cultural barriers that are specific to the region.

In the beginning of 2022, we also made a strategic acquisition of the studio 6waves which has extensive experience of adapting and bringing high quality strategy games to the Japanese audience and will strengthen Stillfront's presence in East Asia and specifically in the attractive Japanese gaming market

### Responsible content

As a group we have a responsibility for the growing gaming population that play our games and the social platforms we create for them. We influence many gamers with our content which is why it is of great importance that we all share the same values and principles that we base our content on.

Our responsible content declaration that includes the FAIR model (available at stillfront.com), was established in 2020 and regulates how we take responsibility for our products and addresses unacceptable content covering our own games and forums. FAIR is an acronym that stands for Forums & communities, Age protection, Inclusion & diversity, and Responsible gaming and monetization.

The FAIR model is integrated into our daily operations and part of our regular business reviews, where our Chief Product Officer and our operational team, meet our studios and review the business and development of the games including new game development.

## DIVERSE GAMING CONTENT

**Objective:**  
Increase diversity in gaming content

**Target:**  
New games introduced or developed, should strive to increase diversity in the game portfolio

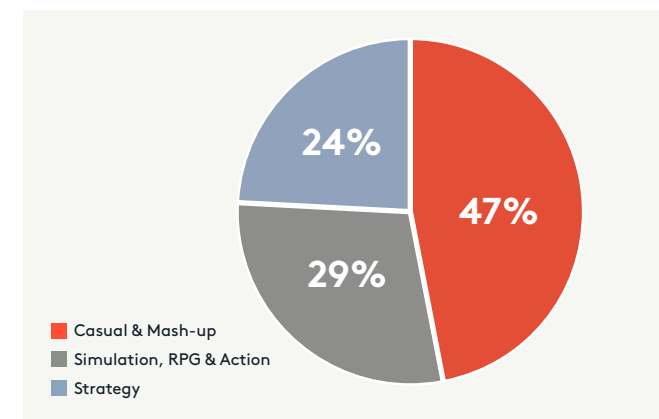
**Policy framework:**  
Responsible content declaration

**Contribution to UN Global Goals:**  
10.2 Promote social inclusion of all  
5.5 Ensure women's full participation



**Result 2021:**  
The active portfolio of games increased to 64 by year-end 2021, offering an even wider range of addressed audience, cultural representation and expanded access for players all around the world.

## GAME PORTFOLIO SPLIT, YEAR-END 2021



## GAMING FOR ALL

## Safe environment for all our gamers

### Responsible gaming culture

Apart from making sure that our products follow our ideas of responsible content; we must also create a positive in-game environment.

We want our gamers to feel safe and respected in our digital worlds, and as people spend more of their free time playing our games, our responsibility of ensuring a good gaming culture is more important than ever.

The opportunity to interact with other gamers is a central and appreciated function in many of our games, but there is a risk of toxic behaviour. Keeping things fair, without cheating or exploitation, is always required. No one is allowed to engage or promote harmful behaviour including attacks on race, sexual orientation, gender identity/expression, religion, heritage, country of origin, or unwelcome sexual advances and messages.

We manage toxic behaviour with built-in functions and algorithms that filter out bad language and gamers that are not behaving well are put on mute. Stillfront has zero tolerance for abusive behaviour amongst users. Our target is that 100 percent of substantiated incidents to be acted on. During 2021, we had several reported incidents, and we take these very seriously. All incidents were handled by our studios according to our strict protocol.

Stillfront games do not offer real money features, including gambling for real money and in-game contests that reward real money. Gamers need to transfer their money via verified purchases into in-game currencies and items. The purchase is a transparent process and in accordance with the platform regulations and applicable law.

### Social standards and steering document

Our ecosystem of game developers, publishers, and platform providers as well as gamers have created social standards of what defines responsible content and not. Our games are to follow the guidelines and recommendations set by the gaming eco-system.

In addition, Stillfront has established its own responsible content declaration that addresses, and have a plan for, unacceptable content from gamers actions in the games. Stillfronts FAIR model, part of our responsible content declaration, regulates our users' behaviour towards each other.

### RESPONSIBLE GAMING CULTURE

#### Objective:

Zero tolerance for abusive behavior amongst users

#### Target:

100 percent of substantiated incidents to be acted on

#### Policy framework:

Responsible content declaration

#### Result 2021:

Several incidents reported and acted upon by the studios, according to our strict protocol.



F: Forum & Communities.

A: Age protection.

I: Inclusion & Diversity.

R: Responsible Games, Marketing and Monetization.

If you want to find out more about our FAIR model, please visit our website [stillfront.com](https://stillfront.com)



## GAMING FOR ALL

## Data security and privacy is key

### Important intelligence

Data is central to Stillfront. Analyzing user data enables us to identify behavior patterns, information of our operations and other insights, which allow us to be even better at developing games, as well as following events, activities, and campaigns for a better experience. The users' interactions with our studios' customer services are an important intelligence when developing our games and new functions.

### An on-going project

Data privacy and data protection are of the utmost importance to Stillfront. We recognize that data privacy and data protection is an ongoing project that demands continuous improvement. Our processes have been designed to safeguard confidentiality, privacy and access to information and data. Stillfront is continuously striving to maintain the highest standards to protect its users from cyberattacks and card fraud when playing our games. We put a lot of resources to comply with all applicable legislations and rules to achieve utmost security and expect the same of our business partners and suppliers.

Our objective is that users should feel that their privacy and data are protected, at all times. Our target is that 100 percent of substantiated incidents to be acted on. In 2021, there were no substantiated material data breaches reported.

### Data Protection Officer and training

Over the years, we have put considerable resources into ensuring that our Privacy program meets the criteria of the General Data Protection Regulation (GDPR) and other applicable data protection and privacy regulations. Stillfront's website contains information on the rights that users have and descriptions of how Stillfront processes personal data. The end-user data is processed by the studios and such processing activities are subject to the privacy notice applicable for the respective games. Deloitte is engaged as the group's external Data Protection Officer (DPO), a role that includes recurring targeted audits.

All professionals of Stillfront are offered regular data privacy and data protection training. Stillfront provides best-practice templates and accelerators that enabled the younger and less mature studios to quickly establish a more solid and formal foundation for their privacy capabilities.

### Fraud prevention

Stillfront's Goodgame Studios has developed its own fraud prevention solution, which has been implemented at several of our other studios. The solution monitors payment patterns in real time and reacts in the event of fraudulent behavior.

### USER PRIVACY AND DATA SECURITY

#### Objective:

Users should feel that their privacy and data are protected at all times

#### Target:

100 percent of substantiated incidents to be acted on

#### Policy framework:

Data Privacy and Data Protection Policy, IT Policy, IT Security Guidelines

#### Result 2021:

There were no substantiated material data breaches reported. All substantiated privacy breaches were handled pursuant to our set routines together with our external DPO, Deloitte.

## LIVING OUR VALUES

## Culture for equality, diversity and inclusion

For a company like Stillfront, our most important asset is human capital. We are committed to build a work culture that is including, diverse, attracts talent and is value-based. Our distributed operating model ensures that studios that is part of Stillfront maintain their unique identities and retain operational autonomy. However, we aim to grow together as a company and as individuals and we believe in long-lasting relationships and a decentralized leadership.

### Our values

The values that shape our culture is a balance between Entrepreneurship, Scale and Structure. These values are framing our operating model and ensure our unique approach to decision-making, collaborations and sharing knowledge.

### A culture where everyone can grow

Our industry faces challenges in the areas of gender equality, diversity, and inclusion. At Stillfront, we are fully aware of how a diversified workforce is key to understanding our global players. Not only is the share of women who are playing games increasing, but there is also a demand for high-quality entertainment in multiple languages, adapted to different cultures, religions, and customs.

Therefore, for us at Stillfront, equality, diversity and inclusion are not only important aspects for creating a culture where everyone can grow – but it is also increasingly important for our product. It has recently been shown that players are equally concerned with inclusion being a part of their gaming experience as they are with gaming quality and content. Stillfront has set a target for improving diversity, inclusion and equality in our game development teams. The objective is to always consider these perspectives when we introduce new game teams.

During 2021 we also set a target to increase the share of women in the group, the gender balance should be 40/60 at all levels within the group. Attracting more women to the game development industry is key to future success and Stillfront's executive management and business management team regard this as a priority in recruitment processes.

We are proud of having 50 percent women and 50 percent men on our board and 38 percent women and 62 percent men in our executive management team. Universally in our group, we had 30 percent women and 70 percent men in 2021.

## EQUALITY, DIVERSITY AND INCLUSION

### Objective:

1. Improve diversity within game development teams
2. Ensure equal career opportunities for all regardless of gender

### Target:

1. New game teams that are introduced, should improve diversity and inclusion
2. The gender balance should be 40/60 at all levels of positions within the group

### Policy framework:

Code of conduct

### Contribution to UN Global Goals:

- 10.2 Promote social inclusion of all
- 5.5 Ensure women's equal opportunities for leadership



### Result 2021:

1. Diversity & Inclusion, part of the FAIR model, is a strategic priority and has been integrated into our daily operations.
2. The gender balance in the group was 30/70 percent at all levels within the group in 2021.



### WOMEN IN SENIOR POSITIONS

During 2021 we set a target to increase the share of women in the group, the gender balance we are striving for is 40/60.

LIVING OUR VALUES

# Attracting and retaining talents

## Ensure well-being of our staff

Our business depends on the wellbeing of our professionals. We operate in an industry that revolves around expertise and talent. Behaving responsibly and sustainably is crucial for our success: an inclusive, equal workplace with high diversity will attract and retain the foremost talent in the industry.

Stillfront is a decentralized organization consisting of 22 independent game studios, based in different geographies. Studios keep their culture and values when joining the group and most of the studios have established HR platforms in place. From a Stillfront perspective it is important to balance the studio's independence and at the same time build and invest in the group and create a strong platform of talents that prosper and enjoy the entrepreneurial values as much as appreciate the global community of colleagues, knowledge and opportunities.

## Talent management program

Stillfront is a knowledge company with highly skilled professionals. Everyone is encouraged to continue learning and training to make a positive contribution to our business and culture.

To ensure continuous learning and wellbeing of our staff, we will continue to build on a talent management program for all employees. This program is still under development and includes for example development talks for all professionals, clear career paths, corporate values, policy, and Code of Conduct training.

During 2022, a forum will be established in the group with focus on developing our talent management program. The forum will focus on different aspects covered in our pillar "Living our values", such as equality, diversity and inclusion as well as employee engagement and well-being.

For Stillfront it is key to attract and retain the most talented people in the gaming industry. Our target is that a minimum of 80 percent of our employees should recommend Stillfront as a place to work. In 2021 80.6 percent said they would recommend Stillfront as a place to work and 86.6 percent of the respondents would recommend their studio as a place to work. The result derives from a newly implemented employee satisfaction index, which is named Stillpoll, that is running on a quarterly basis. An HR network is established in the group, with the purpose to drive knowledge sharing in several areas such as recruiting, compensation, inclusion & diversity etc.

Stillfront's talent management program supports parental leave, and the group has zero tolerance against harassments and discrimination.

## EMPLOYEE ENGAGEMENT & WELLBEING

**Objective:**

Attract and retain the most talented people in the gaming industry

**Target:**

Minimum 80 percent of our employees should recommend Stillfront as a place to work

**Policy framework:**

Code of conduct

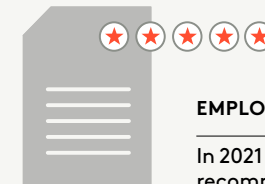
**Contribution to UN Global Goals:**

8.5 Decent work for all



**Result 2021:**

80.6 percent of the employees recommend Stillfront as a place to work.



**EMPLOYEE SATISFACTION SURVEY**

In 2021 80.6 percent said they would recommend Stillfront as a place to work.



## LIVING OUR VALUES

## Business ethics at the core

### Code of conduct

Our decentralized organization lets us seize local opportunities and as a group we share the same principles and values. Our Code of Conduct, built upon the ten principles by United Nations Global Compact, which Stillfront is signatory of, states that all professionals around the world should act as Stillfront representatives and responsible citizens. To ensure alignment on our Code of Conduct we conduct yearly training with all employees.

### Speak-up channels

Our Speak-up system has been updated during the year and is available on our website and open for both internal and external reporting. Reports can also be made by e-mail or by post. All reports are treated consistently and fairly. Cases are handled by Stillfront's Speak-up Committee which comprises the Chairman of the board and the General Counsel, in a fair, consistent way, without bias. Our target is that 100 percent of substantiated reported incidents in our speak-up channels should be acted upon. During 2021, all issues reported through Stillfront's dedicated Speak-up channels have been acted on in accordance with applicable laws and regulations.

### Anti-bribery and Anti-corruption

Stillfront has a zero-tolerance stance against bribery, corruption and money laundering and has adopted an Anti-bribery and Anti-corruption Policy that apply to all companies and professionals of the Stillfront Group. We are further committed to observing the standards of conduct set forth in applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations, including the United Kingdom Bribery Act 2010 and the United States Foreign Corrupt Practices Act.

Professionals that are engaging with external stakeholders are trained in the Anti-bribery and Anti-corruption Policy on a regular basis. Any breach of the principles set out in the policy must be reported through the designated channels, which includes Stillfront's Speak-up channels.

### Ensure accurate tax status

The payment of taxes is a central link between governments, communities, and businesses. Stillfront has assessed how different tax rules affects its operations, to ensure an accurate tax status. Stillfront reports and pays tax in accordance with applicable legislations, considering expert advice from tax advisors. The tax rate for the full year of 2021 amounted to 25 percent for the group.

### Due diligence before acquisitions

All companies that we acquire undergo due diligence specifically focusing on internal processes that safeguard legal and financial compliance, including preventing corruption, sanctions and anti-money laundering screening.

## RESPONSIBLE GAMING CULTURE

### Objective:

Employees should act as Stillfront representatives and responsible citizens

### Target:

100 percent of substantiated reported incidents in our Speak-up channels should be acted upon

### Policy framework:

Code of conduct

### Contribution to UN Global Goals:

16.5 Reduce corruption and bribery



### Result 2021:

All issues reported through Stillfront's dedicated Speak-up channels have been acted on in accordance with applicable laws and regulations.



## INCREASED TRANSPARENCY

During 2021, all issues reported through Stillfront's dedicated Speak-up channels have been acted on in accordance with applicable laws and regulations.

SMART RESOURCE USE

# Climate action

### Environmental committee

Our strategy as a company within digital entertainment and low-carbon operations, is to measure our footprint, reduce it as much as possible and then compensate for the remains. Stillfront conducts yearly green-house-gas emission (GHG) disclosure, quantifying our total CO<sub>2</sub> emissions since 2019. During 2021, we have assessed our internal managerial responsibilities to ensure correct and transparent reporting. As a result, we have initiated an environmental committee, consisting of representatives from all studios. The purpose is to drive integration of the group’s environmental initiatives and reduction plan.

### GHG process for 2021

2021 was still an anomaly in many ways, affecting our environmental footprint. In the calculations for 2021, the head-office of Stillfront and 21 studios participated, to be compared with

16 studios in 2020. Stillfront’s professionals worked predominantly from home in all our studio locations and had limited business travels. To get a full view on employee commuting for 2021 a survey was sent out to all employees. The survey also covered remote work.

### GHG emissions for 2021

Stillfront’s total GHG emissions for 2021 was 32.186 tCO<sub>2</sub>e, to compare with 27,850 tCO<sub>2</sub>e in 2020 and 27,995 tCO<sub>2</sub>e in 2019. The reasons for the increase in total emissions, are that more studios are included in the calculation as a result of the growth of the company and that the reporting is more complete and covers more categories.

### Climate reduction and target

During the year we conducted our first climate reduction impact analysis, resulting in an activity plan and a framework

for our first long-term targets. During 2022, our ambition is to set an emissions reduction target in line with the Science Based Targets Initiative’s (SBTi) criteria. To be able to succeed with our emissions reduction plan and commit to long-term targets, we will roll-out a playbook in 2022, providing strategic support for our studios in implementing the initiatives. The playbook will also include initiatives covering responsible gaming.

### Scope 1 and 2 emissions

Scope 1 and 2 emissions total 3.4 percent of the total emissions in 2021. The largest category of emissions in scope 1 and 2 are direct emissions from energy and heat generation at company-owned facilities. In order to reduce our emissions in scope 1 and 2 Stillfront will for example focus on increasing the sources of renewable energy for our company premises.

CARBON REDUCTION

Target:

During 2022, our ambition is to set an emissions reduction target in line with the Science Based Targets Initiative’s (SBTi) criteria.

Policy framework:

Sustainability policy

Contribution to UN Global Goals:

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



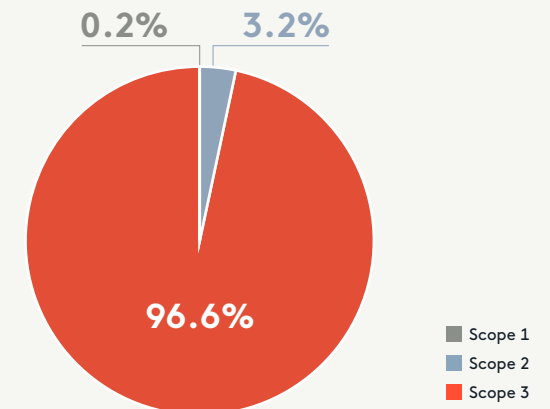
Result 2021:

During the year we conducted our first climate reduction impact analysis, resulting in an activity plan and a framework for our first long-term targets.

STILLFRONT'S TOTAL GHG EMISSIONS

	2019	2020	2021
Scope 1	5	8	64
Scope 2	592	1,150	1,026
Scope 3	27,358	26,692	31,096
<b>Total</b>	<b>27,955</b>	<b>27,850</b>	<b>32,186</b>

TOTAL GREENHOUSE GAS EMISSIONS PER SCOPE 2021



Climate action, cont.

**Scope 3 – indirect emissions**

Stillfront’s largest footprint lies within scope 3, our indirect emissions, which makes up 96.6 percent of our total emissions for 2021 (95.8 percent for 2020 and 97.9 percent for 2019). The largest part is the energy consumed by our users when playing our games (use of sold products), adding up to 87.8 percent of our scope 3 emissions for 2021. During 2022 we will further analyze our emissions deriving from the second largest category “purchased goods and services” and specifically focus on the emissions from our performance marketing activities which will be included in our calculations going forward.

The category “use of sold products” includes in total 3,607 million hours of gaming with a majority on mobile devices, adding up to 88 percent. The tCO<sub>2</sub>e emissions from gaming totals 27,301, with 12 percent adhering to mobile gaming.

**Stillfront – Climate neutral since 2019**

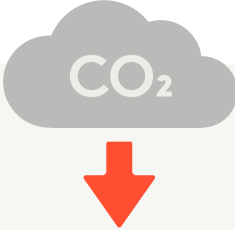
At Stillfront, we have calculated and compensated for all our GHG emissions for 2021. Following the Greenhouse Gas

Protocol, we made a strategic decision already in 2019, to expand our corporate responsibility to include our indirect emissions, and to compensate for them as well, to offer products that are climate neutral. This means that every time a Stillfront-gamer charges their device, the energy consumed has been calculated and compensated for.

**Climate investments**

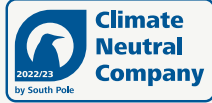
Stillfront is climate neutral also for 2021. For compensation, it is important to partner with an actor that is trustworthy and has projects that are certified gold standard. We have chosen to partner with South Pole, who meets these requirements.

For 2021, we have compensated for our emissions by investing in three projects: a regenerative braking technology project for Dehli Metro Rail Corporation, a technological innovation to speed up low-carbon transport in Dehli. Project number two is Kalasin Wastewater Treatment in Thailand that generates biogas from wastewater and thirdly Kariba Forest Protection in Zimbabwe.

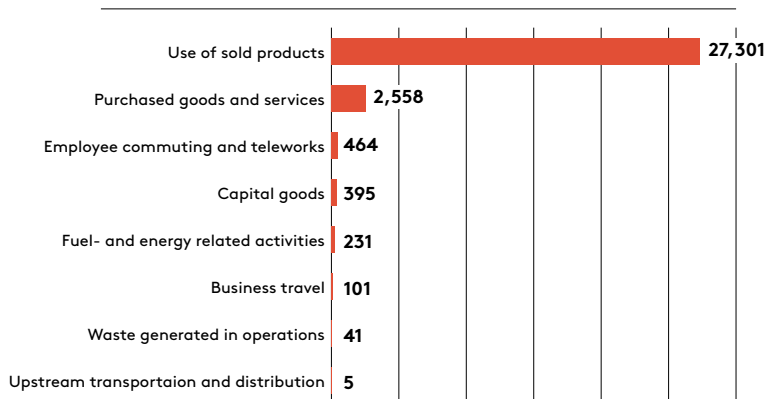


**CARBON REDUCTION PLAN**


During the year we conducted our first climate reduction impact analysis, resulting in an activity plan and a framework for our first long-term targets.



SCOPE 3 EMISSIONS 2021, tCO<sub>2</sub>e



MOBILE GAMING IS ALMOST 50 TIMES MORE ENERGY EFFICIENT THAN PC GAMING.



**Mobile gaming**  
**1.0** tCO<sub>2</sub>e

**PC gaming**  
**49.4** tCO<sub>2</sub>e

One million hours of mobile gaming generates 1.0 tCO<sub>2</sub>e emissions while one million hours of PC gaming generates 49.4 tCO<sub>2</sub>e emissions.



# How we govern sustainability

## Key policies

Stillfront offers a shared framework of values and business principles to underpin local implementation and drive sustainability improvement in our studios. Our key policies include Code of Conduct, Sustainability, HR, Data privacy & security, Anti-Bribery & Anti-corruption as well as a Speak-up procedure. The policies are assessed on a yearly basis by the board of directors, and we conduct yearly policy training of the group's employees.

Our FAIR model is our primary steering document for responsible content and comprises our values and principles that we base our content on. Our FAIR model includes Forum & Communities, Age protection, Inclusion & Diversity as well as Responsible Marketing and Monetization.

## Responsibilities

The board of directors is responsible for Stillfront's overall strategy, in which sustainability is integrated. Our management team develops tools and processes that guide the head office and our studios. All our studios and their professionals are expected to live up to our sustainability ambitions. The studio head is responsible for implementation together with the representative of the environmental committee, carrying out trainings and follow-ups. An approach that is resource-efficient, decentralized, and digital is key to our business' success. During 2022 Stillfront will continue its studio support program, which for example includes training in responsible content as well as implementation of carbon reduction plan.

## Results from stakeholder dialogues

In steering our sustainability work effectively, we engage in close dialogue with our stakeholders. The stakeholder groups have been identified as the groups that are affected by our operations most and which have a major impact on our ability to reach our goals.

STAKEHOLDER GROUP	FORMAT	KEY ASPECTS
Shareholders and investors	<ul style="list-style-type: none"> <li>&gt; Interviews</li> <li>&gt; Meetings</li> <li>&gt; Analysis</li> <li>&gt; Capital markets day</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Data privacy and security</li> <li>&gt; Responsible gaming</li> <li>&gt; Anti-corruption</li> </ul>
Users/consumers	<ul style="list-style-type: none"> <li>&gt; Customer dialogue</li> <li>&gt; Internal analysis by product specialists</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Regular product updates</li> <li>&gt; Data privacy and security</li> <li>&gt; Climate impact</li> </ul>
Professionals	<ul style="list-style-type: none"> <li>&gt; Surveys</li> <li>&gt; Meetings with managers</li> <li>&gt; HR network</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Sustainable, accountable, equal workplace</li> <li>&gt; High-quality, long-lasting products</li> <li>&gt; Data privacy</li> </ul>

# Taxonomy reporting

For 2021, Stillfront is obliged to disclose the proportion of Taxonomy-eligible and Taxonomy non-eligible activities in group-level Turnover, Capex and Opex, as well as to provide qualitative information relevant for these disclosures.

Stillfront has implemented the requirements of the EU Taxonomy Regulation and reports according to the Delegated Act supplementing Article 8 of the Taxonomy Regulation. As a first step, an assessment was done to conclude whether Stillfront's operations were in the scope of the Taxonomy.

## Accounting policies

For the purpose of reporting according to article 8 of the Taxonomy, Turnover, Capital expenditures ("Capex") and Operational expenditures ("Opex") are defined as follows. Note that these definitions deviate from how Capex and Opex are defined in Stillfront's financial reporting.

## Turnover

Total Turnover corresponds to Net revenues in the Consolidated statement of comprehensive income in the financial statements. See also note 5 in the financial statements.

## Capex

Total Capex corresponds to additions, including business combinations, to balance sheet items intangible assets excluding goodwill, and equipment, tools, fixtures, and fittings, before depreciation, amortization, or impairment, as specified in notes 14 and 17 (lines Acquisition of companies, Internal development in the year, and New acquisitions) to the Consolidated statement of financial position, complemented by additions/changes to right-of-use assets as specified in note 16.

## Opex

Total Opex corresponds to non-capitalized short-term leases (see note 16), maintenance, and repair costs and other direct costs for the day-to-day servicing of equipment, tools, fixtures, and fittings.

## Stillfront's interpretations of the Taxonomy

Identifying economic activities relevant for the company has required interpretations of the Taxonomy as well as of the Delegated Acts. Stillfront's interpretation is that our Turnover as a publisher of games is not covered by the Climate Delegated Act and consequently is Taxonomy-non-eligible.

Our interpretation of Capex is that the additions to right-of-use assets, mainly leased office premises, are individually Taxonomy-eligible Capex corresponding to activity 7.7. identified in the Taxonomy Annex 1.

Our interpretation of Opex concludes that the amounts are relatively insignificant, and the company does not have access to all detail.

It is therefore not possible to determine if items are included that would be defined as eligible under the EU Taxonomy Regulation, but the company has assumed that the entire amount is non-eligible.

## TAXONOMY REPORTING 2021

Key performance indicators	Total SEKm	Share	Share
		Taxonomy-eligible, %	Taxonomy-non-eligible, %
Turnover	5,455	0	100
Capital expenditures	2,511	2	98
Operational expenditures	5	0	100

# Auditor's report on the statutory sustainability report

To the general meeting of the shareholders in Stillfront Group AB (publ),  
corporate identity number 556721-3078

## Engagement and responsibility

It is the board of directors who is responsible for the statutory sustainability report for the year 2021 on pages 11–23 and that it has been prepared in accordance with the Annual Accounts Act.

## The scope of the audit

Our examination has been conducted in accordance with FAR's auditing standard RevR 12 The auditor's opinion regarding the statutory sustainability report. This means that our examination of the statutory sustainability report is substantially different and less in scope than an audit conducted in accordance with International Standards on Auditing and

generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinion.

## Opinion

A statutory sustainability report has been prepared.

*Stockholm, 19 April 2022*  
*Öhrlings PricewaterhouseCoopers AB*

**Nicklas Kullberg**  
*Authorized Public Accountant*