



# Promoting responsible tourism that cares for people and the planet

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) REPORT 2022

  
Nordic Leisure  
Travel Group



# Foreword

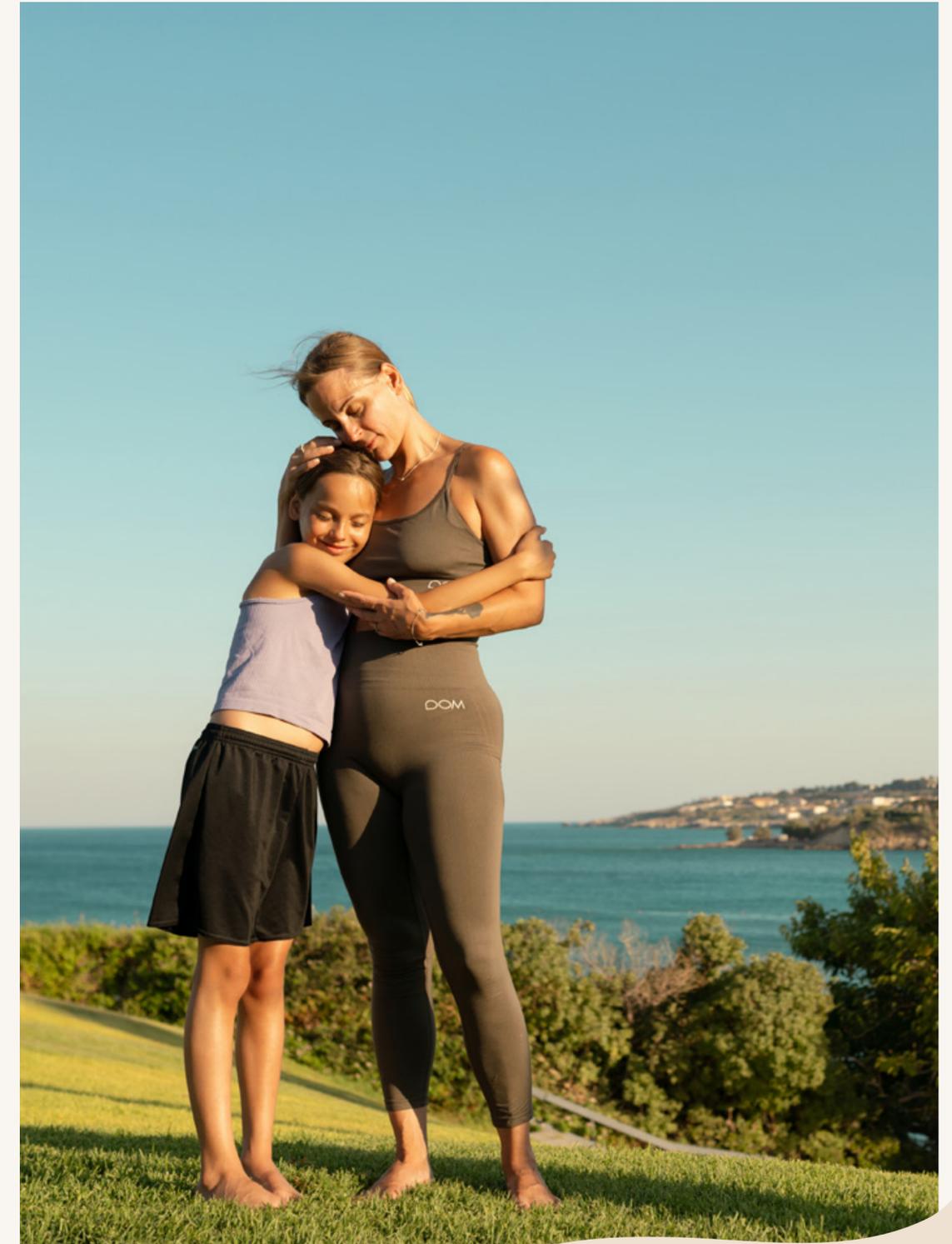
## Our vision is to be the leading Nordic holiday company dedicated to wellbeing.

As the leading leisure travel group in the Nordic region, we are uniquely placed to help promote the wellbeing of people and the planet through continuously pushing the tourism industry in a more sustainable direction. This is a responsibility we take seriously.

Each year, we give thousands of holiday-makers the chance to relax, re-energise and connect with each other – precious time for their own wellbeing.

But wellbeing is about more than the individual. Therefore we cooperate closely with our hotel partners and invest in our local destinations to promote strong economic growth and good environmental management. At the same time, we are working with airlines and fuel companies to develop new initiatives that will drive down emissions from air travel for everyone.

Our mission is to take a position as the **leading holiday company in responsible travel** so people can travel for their own wellbeing, while also protecting the wellbeing of others and the planet.





# Contents

<b>Foreword</b>	<b>2</b>	Risk and opportunities .....	17	<b>Governance</b>	<b>39</b>
<b>Contents</b>	<b>3</b>	Implementation and progress .....	18	Governance .....	40
<b>A conversation with Magnus Wikner, CEO of Nordic Leisure Travel Group</b>	<b>4</b>	<b>Environment</b>	<b>19</b>	ESG governance .....	41
<b>About this report</b>	<b>6</b>	Reduction of carbon emissions and consumption of resources .....	20	Special compliance conditions .....	42
Our key achievements in 2022 .....	7	SDG targets covered in our ESG strategy .....	22	Policies .....	43
<b>Our business</b>	<b>8</b>	Our E targets .....	23	Risk management .....	45
Our business .....	9	Towards net-zero carbon emission flights .....	24	Measuring impact and progress with Worldfavor ...	46
ESG milestones .....	11	Towards sustainable hotel operation .....	26	<b>Stakeholders</b>	<b>47</b>
<b>ESG strategy</b>	<b>12</b>	<b>Social</b>	<b>27</b>	Our stakeholders .....	48
Our vision for responsible tourism .....	13	Making a positive difference .....	28	<b>ESG data tables</b>	<b>49</b>
Our sustainability focus .....	14	SDG targets covered in our ESG strategy .....	29	ESG development tracking .....	50
Our actions towards a more sustainable future .....	15	Our people .....	31	Supporting graphs: GHG emissions .....	54
The United Nations Universal Programme for Sustainable Development .....	16	Our social and people targets .....	32	<b>Statements, References &amp; Contact</b>	<b>55</b>
Our approach to the UN Global Compact .....	16	For the wellbeing of those who need a voice .....	33	Internal sign-off statements .....	56
		Destination impact .....	35	Auditor statement .....	57
		Service with a smile .....	37	Report references and contact .....	58

# A conversation with Magnus Wikner, CEO of Nordic Leisure Travel Group

## → Why, in your opinion, is the tourism industry important for the world?

Tourism is the biggest employer globally – responsible for around every tenth job – so obviously it helps fuel regional development and growth all over the world. But it's also important in another way – it builds bridges. Tourism and travel enable people to experience, connect with and better understand different cultures. This common understanding is incredibly important in the global world we live in today.

## → In terms of sustainability, does the tourism industry have something to offer that other industries don't?

Yes, definitely. As a global industry, tourism touches millions of people and has a substantial impact on local environments. This is especially true for companies like ours that work across the entire value chain. Nordic Leisure Travel Group (NLTG) is a fully integrated holiday business, which means we have control over every customer touchpoint, from the flight to the hotel stay. That brings us into contact with many people – not just employees and guests, but also suppliers, local authorities and industry decision makers – which gives us a unique opportunity to have a positive influence.

A good example is Travelife sustainability certification, which all of our branded hotels have. This isn't something we have done in isolation. It involves all the infrastructure and sourcing around the hotel, so we need to work closely with local authorities and suppliers to make it happen. It gives us the opportunity to influence how many different things are done. Our goal is for all our third-party hotels to have similar certification by 2030, which means this influence will now be even

wider. This is a big focus for us and I'm extremely proud to say that the number of our third-party hotels with accreditation from the Global Sustainable Tourism Council (GSTC®) rose from 72 to 385 in 2022.

## → What is the biggest environmental challenge for the tourism industry?

The carbon footprint of air travel, without a doubt. It accounts for 90% of all emissions in our industry. People will continue to fly, so the tourism industry has a responsibility to do what it can to drive down emissions.

At NLTG, we have set ourselves tough targets to reduce emissions from our own airline. Currently, our emissions are 68 grams per passenger kilometre, which is approximately the same as our pre-pandemic levels and well below the global average. Our goal is to reduce that by 25% by 2030 and we're working on a range of initiatives, including full renewal of our fleet and the use of sustainable aviation fuels, to make it happen. Our long-term goal is to deliver net-zero carbon emission air travel. We believe this is possible, but it will require the cooperation of the entire industry – not just with suppliers but also between competitors, aircraft manufacturers, policy makers and other industries.

Emissions from energy consumption at hotels is also important. We want all the hotels we operate to use electricity from renewable energy sources by 2025. Here, I'm pleased to say, we're ahead of our target. By the end of 2022, 93% of the hotels we operate got 100% of their electricity from renewable sources.



→ **Given the impact of the industry, how do you believe it can contribute to social improvements?**

The tourism industry is all about people, so it can influence social improvement in a lot of ways. But perhaps the most significant is the impact it can have on local communities. If done right, tourism can create jobs, investment and new infrastructure. People want to travel to places with a unique culture, nature and atmosphere, so it is essential that this development is done in a sustainable way.

I've seen this with my own eyes. I started in NLTG 37 years ago at a new Ving hotel in Crete, as an entertainer in the show team. I go back to that same village every year and the changes have been hugely positive. The region now has an airport, hospital and university, and a renewable power station that supplies electricity for half the island. This means greater opportunities for the people who grow up there – not just in tourism, but in other industries as well.

→ **NLTG has a lot of ambitions within sustainability. What did you do internally in 2022 to make sure they are achieved?**

Last year, we launched our new ESG Strategy, so this year we worked to integrate that strategy into our business. Every business unit now has its own sustainability targets, and these are measured and followed up regularly by the management team. This is so important. Sustainability shouldn't just be part of your business; it should be how you run the business. We also introduced Worldfavor, a sustainability management and reporting platform that will give us a more transparent and structured approach to identifying, measuring and reporting. There is much more to do, but we are making good progress.

→ **Your company vision is to be the leading Nordic holiday company dedicated to wellbeing. What does wellbeing mean to you?**

It means different things in different contexts. To an individual or family, a holiday is important to wellbeing as it is a time to relax, recharge and be together. But when we talk about wellbeing at NLTG, we also mean the wellbeing of our employees, the wellbeing of the destinations we travel to, and the wellbeing of the planet. To be a truly sustainable travel company, we must positively impact all of these.

That's what our sustainability strategy is all about. We have made good progress during the year. But we also know that we are only at the beginning of this journey. There is still much to do – and I'm looking forward to continuing to work with my colleagues, our customers, suppliers and others in the industry to make it happen.



**MAGNUS WIKNER**  
CEO, NORDIC LEISURE TRAVEL GROUP



## About this report

We are very proud to present our Environmental, Social and Governance (ESG) report for our financial year 21/22.

Since 2019, we have been working to recover from the uncertainty following the Thomas Cook bankruptcy and the effects of the covid-19 pandemic. Now we are here – presenting the first step in our new ESG journey.

Over the past year, we implemented governance structures and systems to support our new and ambitious footprint improvement targets. We introduced a new data management platform, called Worldfavor, which will help to monitor and optimise our performance and, not least, achieve our short and long-term ESG objectives. We are still not where we want to be in our use of Worldfavor, but we have started and will continue to improve over the next year.

Part of our data journey is to map out our current position – with a company as complex as ours, we have a big task in front of us just trying to define our baseline. Our work to improve our environmental footprint has been part of our DNA for decades – but we have always approached each issue individually. Now we have to look more holistically at our total footprint – which requires a new approach. We have come far in this already, but it is a long-term commitment.

The report has not been prepared in full accordance with the Global Reporting Initiative (GRI) Standards. However, we have included GRI indicators in the data tables at the end of the report.

In this report, we present some of our results from the past year – examples of all the great work that has been done throughout the organisation. The keyword here is ‘throughout’. We have managed to engage the entire organisation in our ESG work – to the extent that ESG is now an integrated part of the way we do business. We regularly follow up on targets and our senior management team have quarterly updates on the progress of the ESG work in each business unit.

We have structured our report around the three standard pillars of Environment, Social and Governance. Each chapter should give you an overall idea of our approach in each of these areas, and how we work with them across our different business units. In each section, you can also find case studies that reflect our work and results from the past year.

The overall responsibility for this report and its content rests with the Board of Directors. The board consists of representatives from the circle of owners and the senior management of the company.

# Our key achievements in 2022

<p><b>1.4M</b> <b>KWH</b></p> <p>of renewable electricity was produced from our own solar panels</p>	<p><b>57%</b></p> <p>of our own operated hotels now run on renewable electricity</p>	<p></p> <p>A new ESG cloud-based data platform was introduced to help monitor our progress</p>	<p><b>20%</b></p> <p>of all our hotels are now certified with GSTC or similar sustainability certification</p>	<p><b>124</b></p> <p>times we cleaned up the beaches surrounding our hotels</p>	<p></p> <p>We implemented an external whistle blower system</p>
<p></p> <p>We entered into partnerships with sustainable aviation fuel producers Arcadia &amp; Nordic Electro Fuel</p>	<p></p> <p>Our new investment partnership with Climatepoint contributes to the sustainability journey for our industry</p>	<p><b>SEK</b> <b>500M</b></p> <p>in salaries and local purchases, contributing to the prosperity of the local societies at our destinations</p>	<p></p> <p>We signed a Nordic partnership with Save the Children to support every child's right to a good and safe childhood</p>	<p></p> <p>We launched a new Animal Welfare policy along with a pledge signed with World Animal Protection</p>	<p></p> <p>Travel with care highlights our ESG focus and guides our customers to find responsible travel options</p>

# OUR BUSINESS



# Our business

**NLTG Holdco AB is the parent company of Nordic Leisure Travel Group (NLTG) – the Nordic region’s largest tour operator.**

NLTG consists of our four Nordic tour operator companies (Ving, Spies, Tjäreborg and Globetrotter), our airline (Sunclass), our branded hotel portfolio (Sunwing, Sunprime & O.B.C.) and our independent taxfree retailer Airshoppen. All our holiday products are package deals, sold through our tour operator brands across our four Nordic source markets.

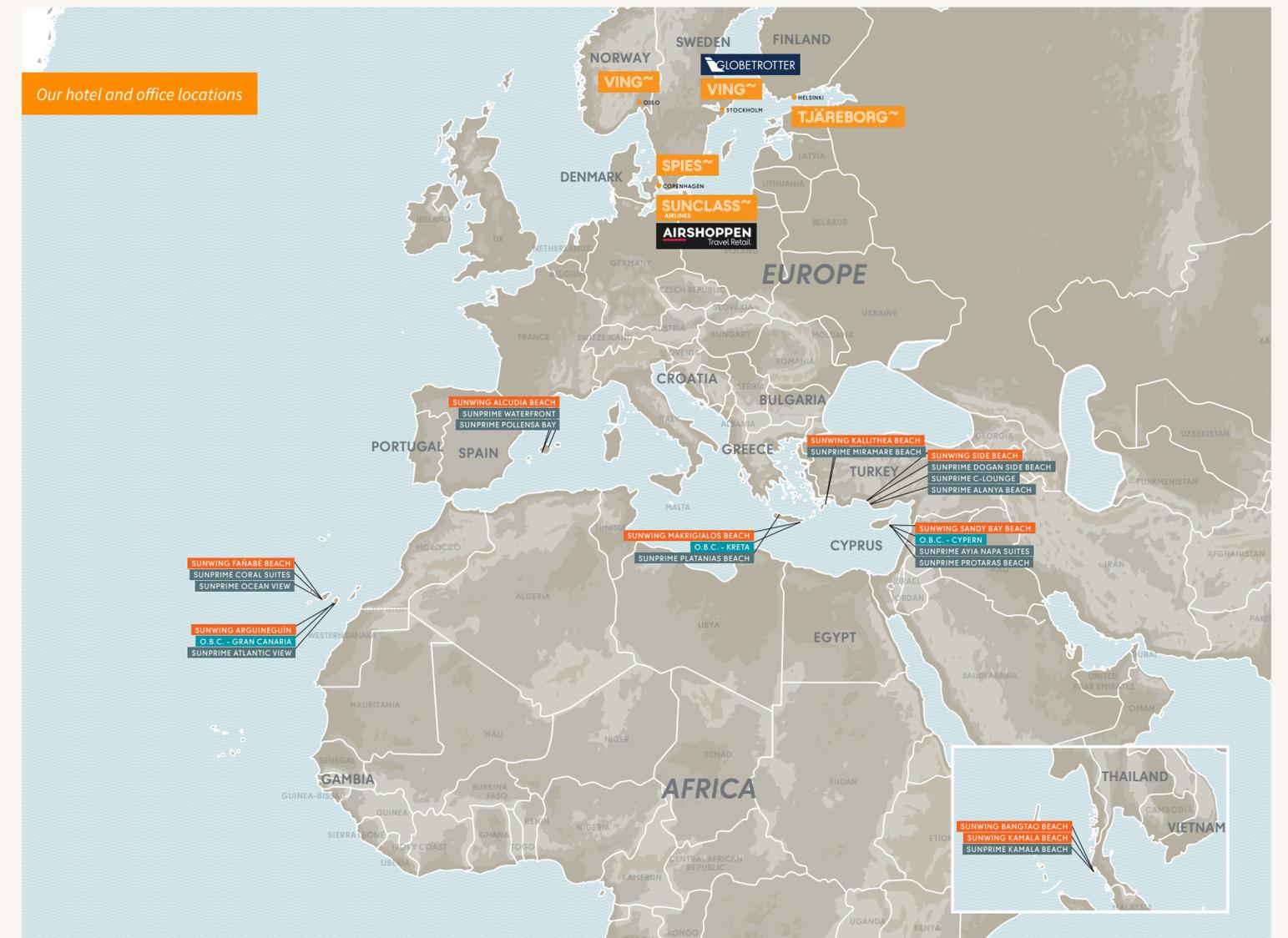
- Our tour operator companies **Ving, Spies, Tjäreborg** and **Globetrotter** offer a range of package holidays to Nordic customers
- **Sunclass Airlines** is the largest charter airline operator in the Nordic region. 98.9% of its flights transport NLTG customers
- **NLTG's Resort & Hotels** portfolio consists of the well-known Sunwing and O.B.C. family hotels and the adult-only Sunprime hotels. The hotels are all located across our most popular destinations
- **Airshoppen** offers pre-order tax-free goods. This service is available on board all Sunclass flights, but Airshoppen also provides services to a number of external airlines



## CHARTER PACKAGE HOLIDAYS

The heart of our business is charter package holidays. This entails a seat on a chartered flight, a bed in a hotel and the services of tour guides. 86% of our charter guests fly with our own airline Sunclass direct to their destination and on board they can purchase tax-free goods from our own tax-free retailer Airshoppen. 26% stay in one of our own concept hotels, the remaining 74% stay in hotels we contract for the season. They all have the use of our own Nordic tour guides in all destinations and we also offer transport services and a broad variety of excursions in collaboration with local partners.

By controlling the full holiday experience, from the flight to the stay, we have full control over the product we offer our customers. That is how we deliver on our promise of making these holidays the best weeks in the customer’s year.





### DYNAMIC PACKAGING

The dynamic package holiday is where our customers buy a package to destinations that primarily supplement our classic package offering in terms of destination or duration. We offer a broad range of destinations, durations, flights and accommodation, sourced through external airlines, hotels, bedbanks and destination partners. These partners live up to our quality and service standards and our customers are covered by all rules and regulations to ensure a safe travel by booking with us.

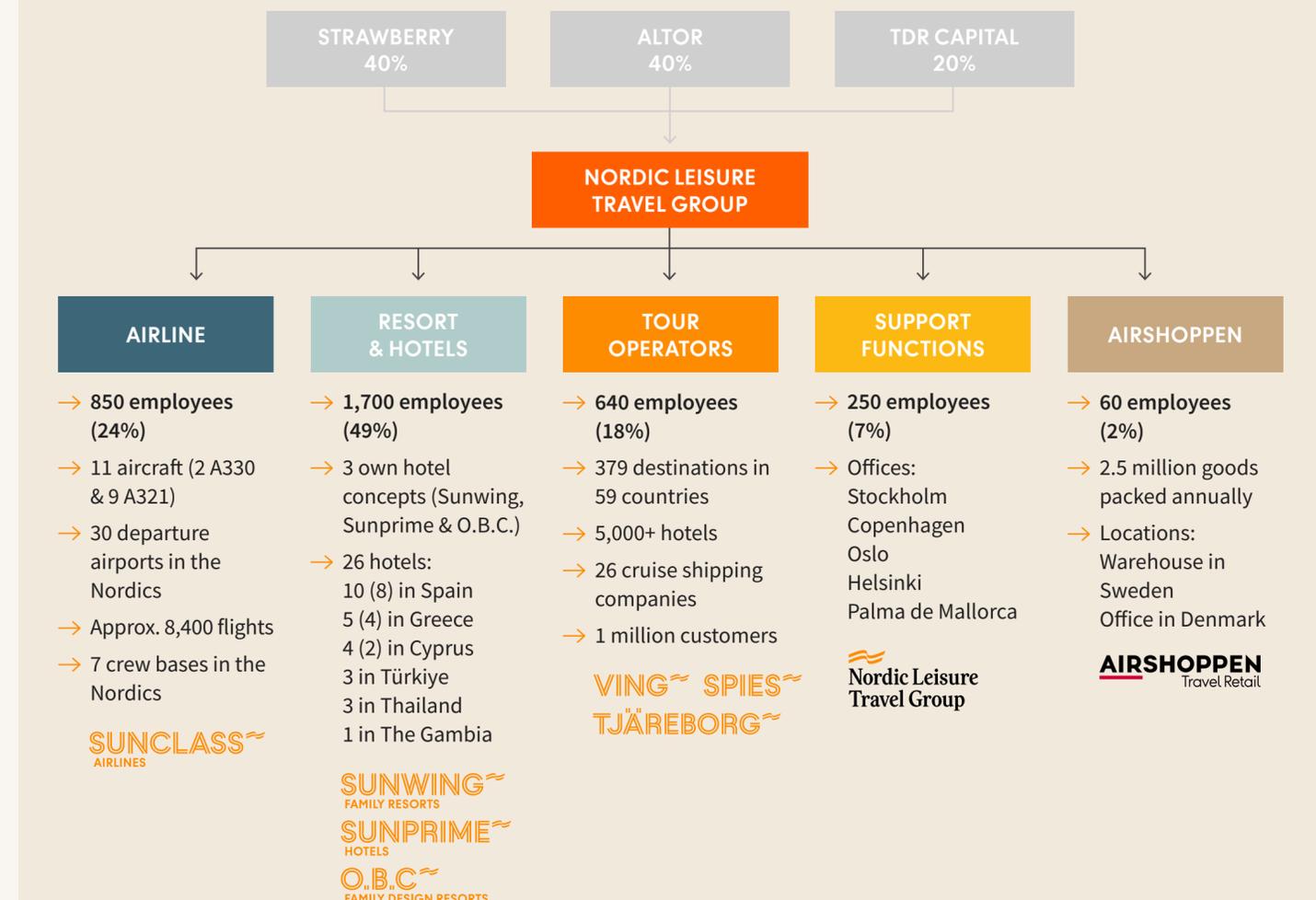
### FINANCIAL PERFORMANCE

In a normal year, NLTG sells more than 1.6 million holidays across our Nordic source markets. However, the circumstances surrounding the covid-19 pandemic continued to have a significant impact on our business organisation and overall activities during the 2021/22 financial year.

The company delivered a turnover of approximately 10.5 billion SEK.

More information about our financial performance for the fiscal year 2021/22 is available online.

### Nordic Leisure Travel Group company structure



Own operated hotels stated in ().

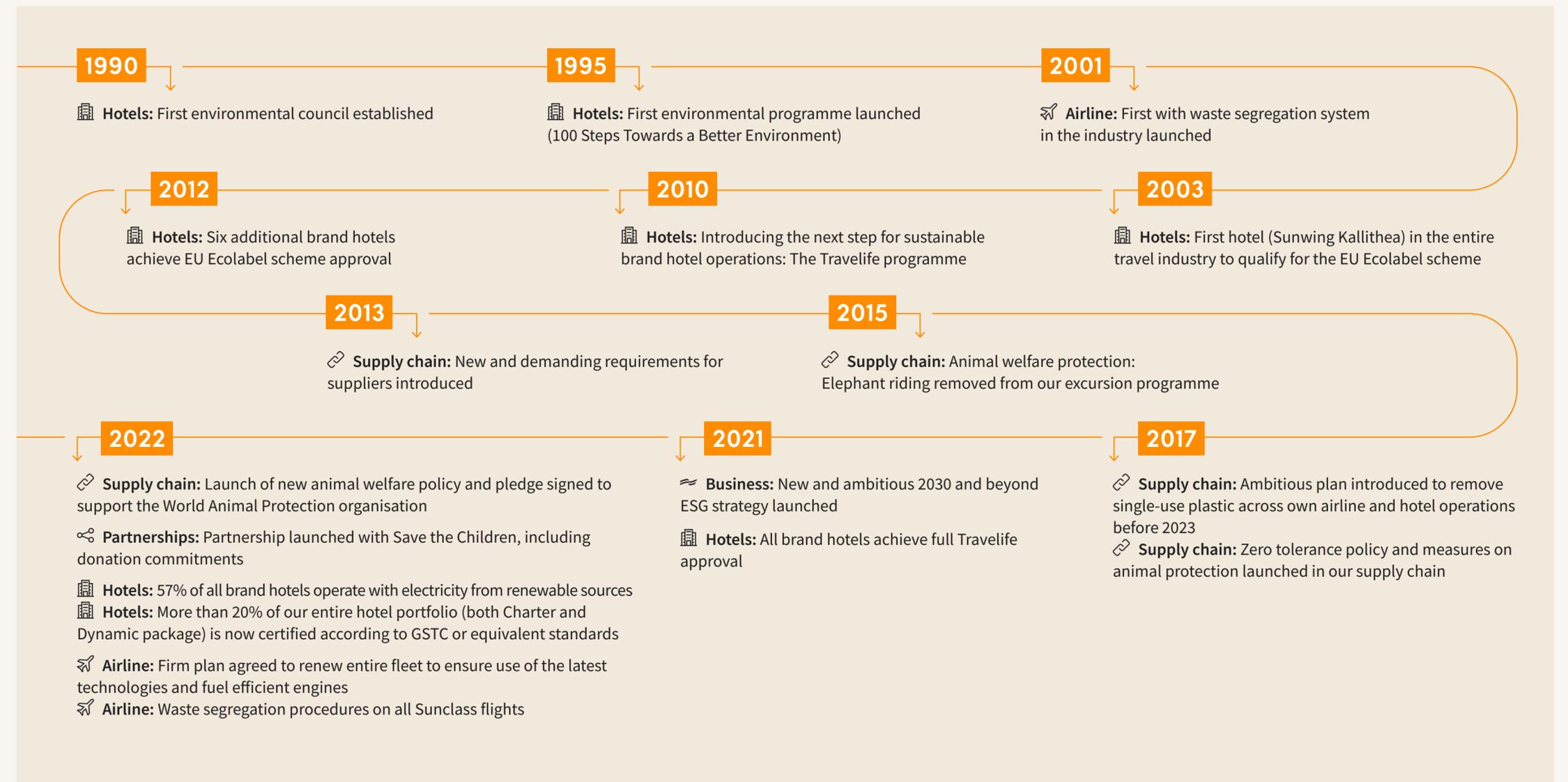
# ESG milestones on the path to sustainable tourism

**NLTG has more than 30 years' experience of working with environmental and social responsibility issues and has delivered many results during that time.**

In the 1990s, long before the rest of the industry, NLTG established an environmental council, taking an important first step in environmental responsibility. The council devised initiatives to reduce the environmental impact of our Sunwing hotels. A few years later, we launched our first environmental programme, 100 Steps. Since then, our extensive efforts in this area have delivered lots of improvements and reductions across our entire business and supply chain.

In late 2021, we launched a new and comprehensive ESG strategy, with strong short-term objectives across all business areas and involving all aspects of our business. The strategy delivered significant results already in its first year.

Going forward, our long-term ambition is to completely transition our business to deliver net-zero carbon emissions from its products and operations, while constantly increasing the positive impact tourism has on society.



# ESG STRATEGY



Our mascots Lollo & Bernie helping kids at beach cleaning



***Our vision for responsible tourism***

*Our sustainability focus*

*Material topics and priorities*

*Sustainable development goals*

*Risk and opportunities*

*Implementation and progress*

## Our vision for responsible tourism

We are convinced that responsible tourism driven by a sustainable travel industry is the only way forward. People will continue to travel for their own wellbeing. As a responsible tour operator, our task is to provide holidays that promote the wellbeing of the traveler, while also protecting and promoting the wellbeing of our planet, our employees and other stakeholders.

We take this responsibility very seriously. We make responsible choices, invest in our local destinations to create jobs and prosperity, and drive initiatives that reduce emissions from our hotels and air travel. We set very high standards in every aspect of our work. But we still have more to do. So, we have now embarked on our most important journey to date – to take a position as the leading holiday company in responsible travel.

We are still at the start of this journey, but we took great strides in 2022 when we launched a new ESG strategy. The strategy will guide us as we move forward. It will help us measure our impact and take steps to increase the positive environmental and social impacts of our work – so we can run our business in the most sustainable way possible.



# Our sustainability focus

## ENVIRONMENT

It is our ambition to offer our customers holidays that deliver a positive impact on our planet. This is a long-term commitment, therefore, we constantly analyse the impact of each step in the customer journey as we look for new ways to reduce our total environmental footprint.

This has enabled us to build a rigorous programme with clear targets in the short, medium and long term. We focus on areas where we can make the biggest difference, for example reducing emissions from our air travel and hotels, and we work with partners to make sure our efforts have a wider impact, both now and in the future.

This also means that we will support the development of new technologies that can bring us and the entire industry closer to our long-term objective.

## SOCIAL

Every holiday makes a difference to the wellbeing of our customers. We also know that our business has a positive impact on the prosperity of small communities that our customers travel to. We will continue to focus on this by hiring local people, supporting local businesses and ensuring good working conditions and good environmental management at our local destinations.

The people who make this happen are our employees and local partners. Without them we would have no business. The wellbeing of all our people is always top of our agenda. We believe that a diverse workforce brings wide-ranging benefits and fresh perspectives into our business. We strive for an open and inclusive work culture that puts each and every employee in focus – so they can develop, advance, be heard and contribute to our business.

## GOVERNANCE

For NLTG to be a leader in responsible tourism, it is crucial that we anchor and manage ESG topics from the board and top management down to an operational level. We must also track any factors that may affect our business and the interests of our stakeholders in the short, medium, and long term, and act accordingly.

We continuously adapt our corporate governance structure and processes to ensure they provide a robust framework for our work. We have strong ESG practices and policies in place to make sure that we navigate correctly through the ESG landscape and deliver on legislative compliance obligations. We also measure and quantify the impact of our initiatives, so we can analyse, improve and share best practice as appropriate with the rest of the industry.

### From compensation to reduction

In 2019, we decided to compensate our carbon emissions for all our activities (all Sunclass flights, bus transfers and hotel nights in our branded hotels). During the years, we have invested in a number of renewable energy projects and water infrastructure projects – in total we have compensated more than 1 million tonnes of CO<sub>2</sub>.

As part of our new ESG strategy, we have however decided to take a more proactive role and work towards actively reducing our footprint instead of compensating for it. This means that as of 1 September 2022 we no longer compensate for our activities\*; instead we focus solely on activities that reduce our footprint, while investing in sustainable solutions for our industry in general.

\* All holidays purchased before 1 September 2022 will be compensated regardless of departure date.

# Our actions towards a more sustainable future

We have identified four essential focus areas, which our efforts and targets are based on. Climate and environmental impact from our operations is significant and a potentially business-critical driver - this requires high priority.

The impact of tourism on the global economy and wellbeing is significant and it is our responsibility to make our impact as positive as possible for society, people and nature.

We are a people-business and our employees are crucial for success. We work to create the best possible conditions for both existing employees and the future talent we attract.



## Material topics

### REDUCTION OF EMISSIONS

We are committed to reducing our GHG (greenhouse gas) footprint through focus on our core businesses.

**Our key priorities:**

- Reduce GHG emissions from our own airline and hotel operations and ultimately achieve net-zero carbon emissions (scope 1)
- Reduce GHG emissions from office and production facilities and own hotel operations (scope 2)
- Engage in the development and utilisation of sustainable aviation fuel
- Invest in new technologies and solutions to contribute to a continuous improvement of the tourism industry's footprint
- Focus on GHG reduction and reporting measures for our supply chain (scope 3)

### REDUCTION OF RESOURCES

Energy and materials constitute a significant part of the environmental impact from our operations. We are committed to reducing the use of natural resources and materials in our operations.

**Our key priorities:**

- Improve resource efficiency
- Reduce waste
- Reduce water consumption
- Reduce plastic consumption

### MAKE A POSITIVE DIFFERENCE

We pledge to act with care in the communities we touch, and to take care of the people and nature in the places we and our customers visit every year.

**Our key priorities:**

- Contribute to positive change, jobs and economic growth
- Protect children's and human rights
- Protect animal welfare and biodiversity
- Engage in local communities
- Contribute to charitable causes

### PEOPLE

The wellbeing of our employees will always be on the top of our agenda. We are fully committed to providing the best conditions for both existing and future employees.

**Our key priorities:**

- Create a healthy, responsible and engaging workplace, for the wellbeing of all existing employees and new talent

# The United Nations Universal Programme for Sustainable Development

The Sustainable Development Goals (SDGs), also known as the Global Goals, were adopted by the United Nations in 2015 as a universal call to action to end poverty, protect the planet, and ensure that by 2030 all people enjoy peace and prosperity.

The programme contributes to necessary changes globally for the benefit of the planet and people. We use the programme as a framework for our ESG approach, and support several of the goals directly via our business activities and concrete sustainability efforts.

We have selected 7 out of the 17 goals as our focus areas. This does not mean that we will not work to contribute to the remaining 10 goals, but merely that our key focus lies with these 7 goals.

## NLTG's focus areas for Sustainable Development Goals

Our social and environmental engagement will have a particularly positive effect on selected SDGs.

 <p><b>5 GENDER EQUALITY</b></p>	<p><b>Gender Equality</b></p> <p>To achieve gender equality and empower all women and girls.</p>	 <p><b>13 CLIMATE ACTION</b></p>	<p><b>Climate Action</b></p> <p>To take urgent action to tackle climate change and its impacts.</p>
 <p><b>6 CLEAN WATER AND SANITATION</b></p>	<p><b>Clean Water and Sanitation</b></p> <p>To ensure access to safe water sources and sanitation for all.</p>	 <p><b>15 LIFE ON LAND</b></p>	<p><b>Life on Land</b></p> <p>To sustainably manage forests, combat desertification, halt and reverse land degradation, and halt biodiversity loss.</p>
 <p><b>8 DECENT WORK AND ECONOMIC GROWTH</b></p>	<p><b>Decent Work and Economic Growth</b></p> <p>To promote inclusive and sustainable economic growth, employment and decent work for all.</p>	 <p><b>17 PARTNERSHIPS FOR THE GOALS</b></p>	<p><b>Partnerships for the Goals</b></p> <p>To revitalize the global partnership for sustainable development.</p>
 <p><b>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</b></p>	<p><b>Responsible Consumption and Production</b></p> <p>To ensure sustainable consumption and production patterns.</p>		

Read more about all the SDGs on the official United Nations webpage: [www.un.org/sustainabledevelopment/](http://www.un.org/sustainabledevelopment/)

# Our approach to the UN Global Compact

We support the 10 principles of the United Nations Global Compact and align the principles with our business Code of Conduct guidelines. Our strategies and target plan are connected to, and support, relevant SDGs, which aim for a more sustainable future for all.

We believe that corporate responsibility starts with a company's value system and a principle-based approach to doing business. This means that we operate in ways where we, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, the environment, and anti-corruption.

Our responsible business approach applies the same values and principles across our entire operation – in destinations, in the air and at our offices.

Read more about the UN Global Compact here: [www.unglobalcompact.org](http://www.unglobalcompact.org)



*Our vision for responsible tourism*

*Our sustainability focus*

*Material topics and priorities*

*Sustainable development goals*

***Risk and opportunities***

*Implementation and progress*



# Risk and opportunities

Significant sustainability risks are:

## BRAND REPUTATION

We are aware that reputational challenges have an impact on our business revenue and brand value. Risks include third-party deliveries and ethics, competitive attacks, and hazards or other catastrophes. We also see subjects related to the handling of issues and concerns related to the covid-19 pandemic, regulatory compliance, employees, and executive misconduct as potential risks. Risks are managed by ensuring that performance always matches expectations. We are aware that proper handling determines whether value or loss is created.

## CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS

Climate change is a global challenge and a threat to all holiday travel organisers. Warmer atmospheres, rising water levels and impacts on humans pose a risk that travel in the future may not be as we know it today. Some destinations will not be available and new locations will have to be found to maintain a business foundation. Furthermore, aviation, which is a central part of the current product, is exposed to a significant risk of impact, and will require extensive change over time.

## ENERGY COST AND ENERGY SECURITY

As a travel company, we depend on efficient energy supplies. We use large amounts of raw materials as an energy product in our own airline and rely on supplied electricity at our hotels around the world. It is crucial that the supplies are protected and that the prices are stable so that we can ensure the operation of the company.

## SUPPLY CHAIN MANAGEMENT

Operators in the travel industry are exposed to risk of failure of deliveries in products or services. For our business there is a risk that there may be a lack of key supplies for our core operations, in particular our hotel and airline operations. In these cases, we will not be able to provide the services we offer our customers, and the business will be affected financially.

## RECRUITMENT AND RETENTION OF TALENT

Our success is driven by our ability to attract talents and to provide a framework that enables them to deliver our strategy and bring the business forward. If the company does not maintain a solid foundation and attractive work environment, there is a risk that in the long run it will not be able to attract the talent needed for continued success.

## SUSTAINABILITY OF DESTINATIONS

As a holiday travel provider, we are exposed to a risk in the event of incidents or changes to the destinations we use. This can include natural disasters, outbreaks of diseases, such as covid-19, or interruptions for political reasons. Should such an event occur in any of our destinations, there is a potential risk of significant operational disruption and costs to our businesses.

## RISK OF CORRUPTION IN VALUE CHAIN

NLTG is aware that part of the value chain may be exposed to external pressure to participate in corruption. NLTG has a zero-tolerance on corruption as stipulated in the Anti Bribery and Corruption Policy. Employees are regularly trained in this policy, to minimize the risk.

# Implementation and progress

**We are systematically embedding ESG into our company strategy and have developed ESG measures that are aligned with what matters most in our current journey to achieve greater sustainability adoption. We have effective procedures in place to monitor our impact and to measure our progress.**

Our ESG strategy is embedded in our overall strategic model. Our ESG impact is part of every aspect of our business, and it is therefore an integral part of how we do business. This means that all business units work towards a common goal and this is reflected in our ESG governance model.

The ESG framework is deeply anchored within our Group Management team, who all have personal ESG objectives in their performance reviews. Overall ESG targets are furthermore integrated in our bonus model.

Each member of Group Management is responsible for their contribution to the ESG target programme. We monitor performance on a quarterly basis and conduct follow-up meetings on progress and initiatives, first

with each Group Management member and finally with the group as a whole. The CEO regularly keeps the Board of Directors updated on ESG topics.

Our sustainability performance is tracked using company reported data. We are aware that evaluating ESG performance can be challenging due to the inconsistent quality of available ESG data and reporting. To ensure more reliable ESG disclosures, we invested in a new cloud-based ESG data platform, Worldfavor. This platform acts as the collection point and analysis tool for ESG-related data. Appointed data suppliers from across our business units and

functions are responsible for ongoing data deliveries. Worldfavor was implemented in 2022 and is still under development.

The model below shows how we ensure ESG focus and data processing.



# ENVIRONMENT



# Reduction of carbon emissions and consumption of resources

**Our own aircraft and hotel operations make up more than 90% of the total footprint from our business – thus this is where our focus and commitment will be to ensure as high an impact as possible.**

## REDUCING FOOTPRINT

Our airline is by far the biggest contributor to our carbon footprint – and renewing our fleet continuously together with the introduction of Sustainable Aviation Fuel (SAF) is crucial to delivering on our targets of having a net-zero: carbon emission operation by 2050. Our high efficiency relies on full utilisation of our fleet and the pandemic has somewhat reduced this with lower load factors and many unscheduled changes, which all impacted our performance.

We report our climate impact from our own airline with a key figure that is based on an average of the total fuel consumption divided by the number of actual passenger kilometers we have completed during the period. The calculation also includes fuel from all empty flights we have carried out. The year's result was 68 grams of carbon emission per passenger kilometre. This puts us back at the same level as before the crisis as one of the best-in-class airlines (global performance is approx. 120 grams).

Our branded hotels are operated under the comprehensive sustainability requirements under the Travelife scheme. We continuously encourage all our other partners to increase their commitments and, by the end of this financial year, approximately 20% were certified with a sustainability programme accreditation (GSTC or similar).

We seek any opportunity to reduce the footprint from our branded hotels via our renovation programme. Furthermore, we seek to use only sustainable sources of energy. At the end of this financial year, 57% of our own operated hotels used 100% renewable electricity. Simultaneously we work in close cooperation with our franchise partners to achieve the same for the remaining brand portfolio.



Our airline had a carbon emission level of 68 grams of CO<sub>2</sub> per passenger km.



Solar panels at the Sunclass offices in Copenhagen produced approx. 82,000 kWh, accounting for approximately 15% of the total electricity consumption at the offices.

<b>Reduction and consumption</b>	SDG targets	Targets to reduce our footprint	Case: Towards net-zero carbon emissions	Case: Towards sustainable hotel operation
----------------------------------	-------------	---------------------------------	---	---



Our mascots Lollo and Bernie showing children how to recycle at the Sunwing Kallithea Beach hotel in Rhodes, Greece.

## REDUCING CONSUMPTION AND WASTE

By 2025, we will have removed all single-use plastic from our operations. Since 2017, we have reduced the consumption of disposable plastic across our business by around 11 million units of single-use plastic products. Some have been entirely removed from our supply chain; others have been replaced with sustainable alternatives. This work will continue over the coming years.

This year, we replaced single-use plastic glasses in our hotel service areas with reusable ones, and introduced reusable bottles in the rooms which can be filled with water from containers in the corridors in all our own operated hotels in Spain.

In our hotels, we have a high consumption of water, and we work to implement as many water-saving measures as possible. We recycle bathwater to irrigate our gardens, and install water-saving filters and pumps in our pools and bathrooms.

We have worked with waste segregation for many years and have substantial systems in place throughout our hotels and on board our aircraft. We also work with our service partners to try to ensure that the waste we sort is handled in a sustainable way.

## INVESTING FOR FUTURE GENERATIONS

The climate crisis is real and we need to take action now in order to ensure that we can look forward to a sustainable way of life in the future.

We will do everything we can to implement sustainable solutions across all our business units, but we will not be able to reach our net-zero targets without new creative thinking and technology.

We have therefore pledged to invest in start-ups with specific objectives to improve the climate footprint of our industry together with our partner Climatepoint.

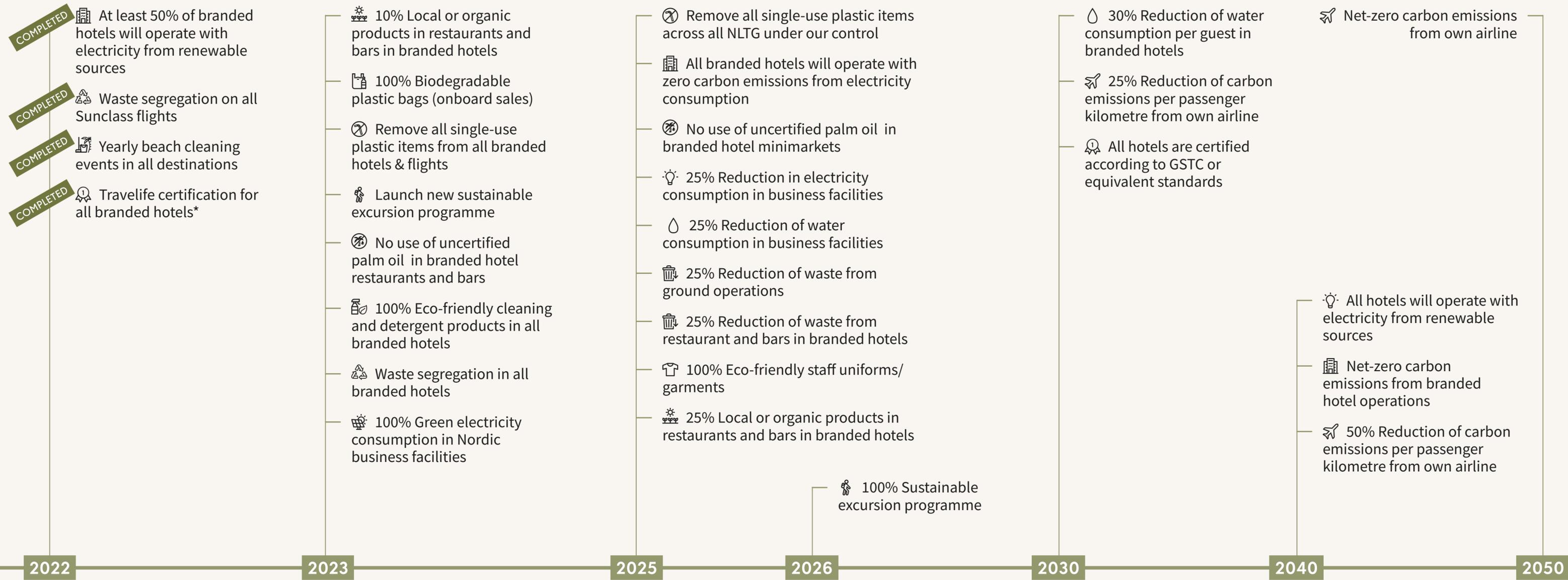
Climatepoint is an investment fund dedicated to sustainable investments.

Read more about Climatepoint here: [www.climatepoint.com](http://www.climatepoint.com)

# SDG targets covered in our ESG strategy

SDG	DEFINITION	SUPPORTED TARGETS	NLTG APPROACH
	Ensure availability and sustainable management of water and sanitation for all	6.3   6.5   6.6	<ul style="list-style-type: none"> <li>Reduce fresh and sanitation water consumption</li> <li>Improve water quality by eliminating or reducing use of hazardous chemicals and materials in operations</li> <li>Support local communities to improve water and sanitation management</li> </ul>
	Ensure sustainable consumption and production patterns	12.2   12.3   12.4   12.5	<ul style="list-style-type: none"> <li>Use resources efficiently, with clear reduction targets</li> <li>Reduction of food waste and improvement of food waste management in our hotel operations</li> <li>Reduce use of chemicals, with clear reduction targets</li> <li>Waste reduction and segregation measures across our business</li> <li>Implementation of sustainable practices across business units and in supply chain</li> <li>Implementation of sustainability awareness and strong behavioural practices</li> </ul>
	Take urgent action to combat climate change and its impacts	13.2   13.3	<ul style="list-style-type: none"> <li>Short and long-term investments that provide a reduction in our climate impact</li> <li>Integration of climate reduction measures in strategy and mitigation plans for all parts of the business</li> <li>Raising awareness and involvement among stakeholders</li> </ul>
	Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss	15.2   15.3   15.4   15.5   15.7	<ul style="list-style-type: none"> <li>Considerate and protective operation of hotels in destinations</li> <li>Support and engage in deforestation projects</li> <li>Preserve and increase biodiversity in areas around our hotels</li> <li>Take actions to protect endangered species of flora, fauna and wildlife</li> </ul>

# Targets to reduce our footprint on the environment



**CASE**

# Towards net-zero carbon emission flights

**At NLTG we are working with our fleet, fuel and partners to make air travel as sustainable as possible in the future.**

Whether it is for work or pleasure, millions of people fly every year. As a responsible airline, it is our task to drive down emissions from air travel, for the good of everyone. In the last 20 years, we have reduced carbon emissions from our flight operations by 20%. But this is just the beginning. Our goal is to deliver net-zero carbon emission flights by 2050 – and we have identified clear steps and goals along the way to make it happen.

**FLEET RENEWAL FOR GREATER EFFICIENCY**

In December 2022, we received our first A330-900neo Airbus. One of the most modern planes ever built, this aircraft includes the latest New Engine Option (neo), as well as multiple aerodynamic improvements. As a result, it reduces emissions by up to 23% per seat kilometre compared to the aircraft it replaces. We plan to switch our entire fleet to neo versions by 2030.

The new aircraft will take us a long way towards our 2030 goal of reducing carbon emissions per passenger seat per kilometre by 25%. But this is still not enough, which is why we are pursuing other carbon reduction

initiatives at the same time. These include better fleet utilisation, introducing efficiency measures – such as implementing a new flight planning system to reduce fuel burn through more optimal route planning – and not least, the introduction of sustainable aviation fuels, also known as SAF.

**THE DRIVE FOR SUSTAINABLE AVIATION FUELS (SAF)**

To truly drive down emissions from air travel, the development and uptake of SAF is essential. The term covers a range of fuels, including low CO<sub>2</sub> jet fuels produced from biogas and CO<sub>2</sub>-neutral synthetic eFuels. However, when it comes to SAF, the aviation industry faces a huge challenge: there’s simply not enough of it to meet demand.

We are working with SAF producers to drive development and production. In 2022, we signed letters of intent with two new producers: Acadia in Denmark and Nordic Electrofuel in Norway. With this, we have committed to support their ambitions and eventually buy SAF from them for our operations. They are both working to start production of eFuel based on water, hydrogen, carbon and renewable energy, which in practice will be carbon neutral. eFuel is approved for use in a 50/50 combination with conventional jet

fuel, and so can bring down flight emissions by 50%. Both Acadia and Nordic Electrofuel are planning to start production within the next two years if they can access enough renewable energy.

**THE JOURNEY TO NET-ZERO CARBON EMISSIONS**

Along with our other initiatives, the increased use of SAF should make it possible for us to reduce carbon emissions per passenger seat per kilometre by 50% by 2040. But why stop there?

Our goal is to achieve net-zero carbon emissions from our flight operations by 2050. We know this is a long-haul journey, and we will continue to work with our partners to find more effective ways of flying – so our customers can enjoy their dream holiday without jeopardising the planet.



**“This is our most important journey ever. We want to drive the green technology shift in the travel industry. There are no other alternatives. We have a clear plan to lower emissions – and a goal to reach net-zero carbon emissions by 2050.”**

– Magnus Wikner, CEO of Nordic Leisure Travel Group

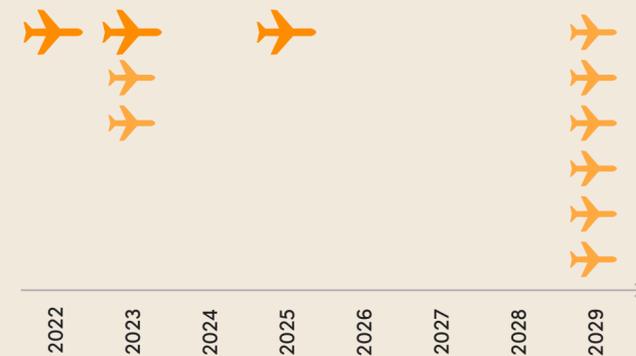
### Key drivers to reach our reduction targets:

- Renew entire fleet
- Introduce sustainable aviation fuels (SAF)
- Develop more efficient ways of flying

### Expected fleet renewal timeline

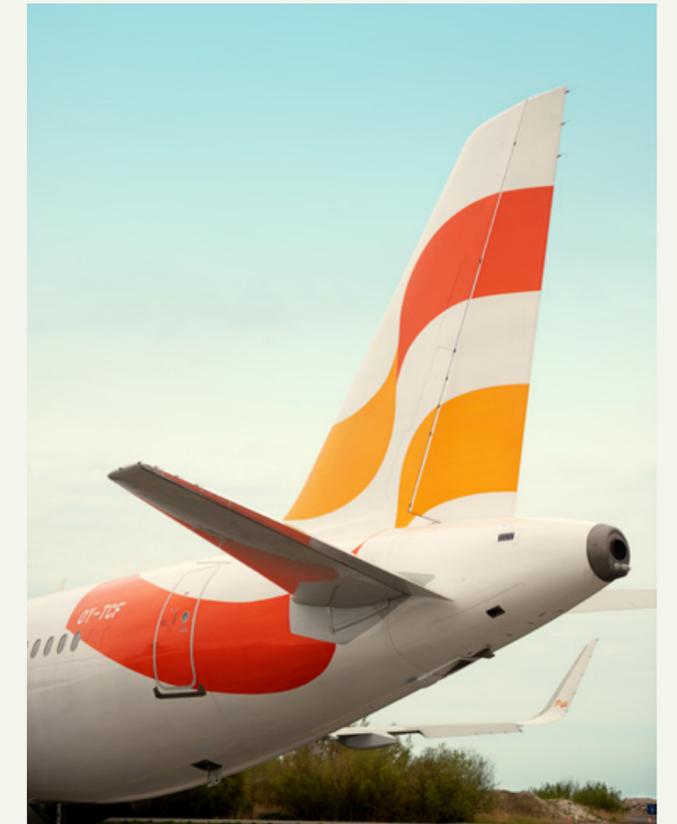
Our aircraft fleet is gradually being replaced to reduce carbon emissions.

 A330-900neo  A321neo



### Sunclass average carbon emissions per passenger kilometre (gram) and our carbon emission reduction targets

Measured against 2019 baseline. Calculations include empty flights.



### Relevant SDG



**CASE**

# Towards sustainable hotel operation

**Welcome to the Sunprime Pollensa Bay Hotel in Mallorca, where guests come from across Europe to relax and recharge. The hotel received a sustainability upgrade in 2022 – and is just one example of our ongoing drive to improve sustainability at all our hotels.**

Located on Mallorca’s stunning north coast, the Sunprime Pollensa Bay Hotel is an oasis of calm. Just a few steps from the beach, it features modern rooms, sea views, a sun terrace, pool and gym. Here, you can unwind and rejuvenate – and enjoy delicious locally sourced food, with fresh top-quality products.

## A ‘GREEN’ OASIS

As part of our drive to improve sustainability in all our hotels, Sunprime Pollensa Bay was upgraded in 2022. Like many of our hotels, Sunprime Pollensa Bay already draws 100% of its electricity from renewable sources. It was further improved last year with a number of changes to reduce energy consumption. These include LED lights, photovoltaic panels for energy production, new insulation and centralised air conditioning units with automatic disconnection in the rooms.

At all our hotels in Spain, the restaurants serve filtered water in refillable glass bottles and there are buffet and bar water fountains where customers can refill bottles instead of relying on single-use plastic. To reduce water consumption at the Sunprime Pollensa Bay, we installed a new water control system in 2022, as well as aerators in all taps and showers in the rooms, double-flush WCs, and sensor-operated sink taps in public areas. Together these innovations are reducing waste, water and energy consumption at the hotel.

## THE NLTG SUSTAINABLE HOTEL CONCEPT

The improvements at Sunprime Pollensa Bay Hotel are just one example of our continuous focus on hotel sustainability. Since our first environmental certification in 2003, we have invested heavily to reduce the environmental impact of all our owned and operated hotels. In 2022, this meant a combined investment of EUR 1.4 million.

Today, all of our branded hotels are fully Travelife certified – a certification recognised by GSTC. In addition, all our hotels in Spain are Carbon Footprint Certified by the Ministry for Ecological Transition.

## Travelife

A leading training and management initiative for tourism companies, Travelife certification requires yearly audits, focused on both environmental and social requirements.

Read more about Travelife here [www.travelifesustainability.com](http://www.travelifesustainability.com)

## GSTC

The GSTC Criteria serve as the global standards for sustainability in travel and tourism. They are set and managed by the Global Sustainable Tourism Council (GSTC®).

Read more about GSTC here [www.gstccouncil.org](http://www.gstccouncil.org)



A view of the hotel Sunprime Pollensa Bay.

# SOCIAL



One of our hospitality teams in Cyprus ready to greet guests

# Making a positive difference

**We uphold the highest standards in social responsibility to drive positive changes for all our stakeholders and the communities that our operations touch.**

**People** are important to us. We conduct responsible business operations with a focus on creating the best conditions for the people who come into contact with us and the companies that choose to invest in us.

We set high standards for labour conditions, inclusion and diversity, and work for fair conditions for everyone, regardless of gender, age, culture, ethnicity, physical and mental abilities, religious beliefs or sexual orientation.

**Our objective** is to ensure a fair representation of gender in all levels of our business with no gender represented by more than 60% by 2025.

**Tourism is important globally** and is of great importance to the millions of people who are directly dependent on it. In 2019 the number of visits by international tourists reached 1.5 billion worldwide (+4%). Of these, 745 million were in Europe, corresponding to 50% of the total market.

The outbreak of the covid-19 pandemic in 2020 and the resulting uncertainty regarding travel continues to pose a crucial challenge to the future of the tourism sector.

**We know that our activities make a positive difference** to the communities and people in many of the destinations that we and our customers travel to every year. The impact is especially significant in destinations where we run our own hotels, contributing with increased local employment, procurement of local products and hotel investments.

In 2022 alone, **our operations resulted in over SEK 500 million being injected into the local communities** where we operate our branded hotels.

**Hiring locally** is an important part of our strategy and success. The vast majority of all our employees in our hotels are locally employed - this year we employed 975 people from local communities.

**Our hotels** are a part of local communities. They are not just a place to stay; they are a base from which to explore the local area, a meeting place, employer and purchaser of local services and products. They also generate income for the government, municipality, and local society.

All our branded hotels mainly employ local people. This connects our company and our customers with the local population and has created relationships across several generations.

We primarily purchase food and materials locally, and as far as possible use locally produced products for, among other things, our bar and restaurant operations.

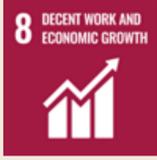
Additionally, our hotels seek to support local organisations and communities. These include food donations, blood donations and beach cleaning activities.

**We support responsible animal experiences in tourism.** In the past year, we entered into an important partnership with World Animal Protection, in which we work together to guide customers to holiday experiences with animals that are conducted in a responsible manner and with respect for the animals.

**We engage in charitable causes.** This year, we entered into a long-term collaboration with Save the Children to fight for the right to a safe childhood for all children around the world. This included a donation of SEK 0.5 million this year and an obligation to donate SEK 1 million annually going forward.



# SDG targets covered in our ESG strategy

SDG	DEFINITION	SUPPORTED TARGETS	NLTG APPROACH
 <p><b>5</b> GENDER EQUALITY</p>	<b>Achieve gender equality and empower all women and girls</b>	5.1   5.2   5.5	<ul style="list-style-type: none"> <li>• Have frameworks in place to promote, enforce and monitor equality and non-discrimination of everyone regardless of gender</li> <li>• Promote and engage underrepresented genders in managerial positions</li> <li>• Commit to having a fair representation of genders at management level</li> </ul>
 <p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p>	<b>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</b>	8.2   8.3   8.4   8.5   8.7   8.8   8.9	<ul style="list-style-type: none"> <li>• Promote responsible tourism and a culture of sustainability at the destinations we operate in</li> <li>• Upgrade our operation with innovative sustainable technologies to enhance efficiency and productivity</li> <li>• Link our strategic plans and production to environmental improvement</li> <li>• Create job opportunities and space for creativity, development and progress</li> <li>• Ensure decent work conditions, equal opportunities and equal pay for all</li> <li>• Stand against forced labour, slavery, human trafficking and child labour of any kind</li> </ul>
 <p><b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION</p>	<b>Ensure sustainable consumption and production patterns</b>	12.2   12.3   12.4   12.5	<ul style="list-style-type: none"> <li>• Use resources efficiently, with clear reduction targets</li> <li>• Reduce food waste and improve food waste management in our hotel operations</li> <li>• Reduce use of chemicals, with clear reduction targets</li> <li>• Reduce and segregate waste across our business</li> <li>• Implement sustainable practices across business units and in our supply chain</li> <li>• Implement sustainability awareness and strong behavioural practices</li> </ul>

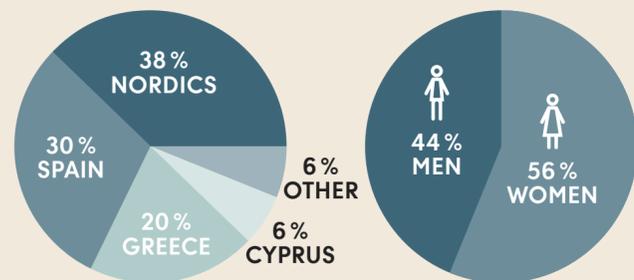
SDG	DEFINITION	SUPPORTED TARGETS	NLTG APPROACH
	<p><b>Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss</b></p>	<p>15.2   15.3   15.4   15.5   15.7</p>	<ul style="list-style-type: none"> <li>• Operate hotels considerately and protectively in respect to the surrounding environment</li> <li>• Support and engage in deforestation projects</li> <li>• Preserve and increase biodiversity in areas around our hotels</li> <li>• Take actions to protect endangered flora, fauna and wildlife</li> </ul>
	<p><b>Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development</b></p>	<p>17.1   17.8   17.14   17.15   17.17</p>	<ul style="list-style-type: none"> <li>• Develop travel destinations and product opportunities in developing countries and make direct financial contributions to local societies through taxes and social contributions</li> <li>• Respectfully use our influence to encourage decision-makers towards sustainable community development</li> <li>• Enhance the use of enabling technology in hotels, in particular information technology</li> <li>• Encourage and promote effective public, public-private and civil society partnerships</li> </ul>

# Our people



**Our people promise:**  
*It should be fun, developing and rewarding to do a good job*

3,500 employees\*



\*Number of employees at the peak of high season.

## Taking care of all our employees and creating the best possible work environment is a key part of our vision.

### OUR PEOPLE PROMISE

Working at NLTG must be fun, developing and rewarding in order for us to deliver on our people promise. This is only possible if we ensure we have a truly engaged and diverse workforce.

2020 and 2021 were difficult years for our company. Due to the pandemic, we had to pause our operations for much of the period. Furthermore, we had to reduce our workforce, with most of our staff using the furlough schemes offered in the countries where they are based. We also paused our external investments, and instead focused on internal knowledge sharing and developing our processes.

Fortunately, 2022 was a much better year. We could again hire staff where needed and we focused on scaling up after the pandemic. We introduced a new HR system that allows us to manage employment data in a lean and safe way. This is a prerequisite to scaling up training – both in-person and e-learning – which is an important part of our employee

development. We also entered into an agreement for a new system for employee pulse surveys, or employee listening, which will be implemented throughout our whole organisation in 2023.

### INCLUSION AND DIVERSITY

Our company is by default diverse – we have staff working in offices, hotels, our airline, warehouses and in resorts all around the world. In our own operations, we have locally employed staff in eight countries. We believe that a diverse workforce and an inclusive work environment where everyone is accepted and can be themselves is the foundation for creating an attractive workplace for all. This can only be achieved if our workforce is diverse, our workplace is inclusive, and there is no unfair or unlawful discrimination or harassment in any of our decisions or behaviours. All our internal policies and procedures ensure this is the case.

We take great care to ensure there is no discrimination in our recruitment and selection process, learning and development activities or career progression opportunities. We have an active appraisal and goal setting process, as well as a development plan for each employee. This is currently implemented for the majority of our

employees, and we plan to roll out these standards for the entire organisation. This ensures that our business objectives and strategy are cascaded to every level of our business and that our employees are engaged, focused and receive training and career development opportunities.

### GENDER EQUALITY

At all levels of the company, we strive for fair representation of genders. We have chosen to phrase the targets based on the overrepresented gender, to include all genders and not just men and women. Our goal for the total workforce is to have no gender represented by more than 60%. Even if we reach our target for the entire workforce, looking across our business we have an unbalanced gender representation in some roles, teams and management groups. This is an imbalance we aim to address in the coming years. We will focus on areas where there is an imbalance and initiate activities to increase the underrepresented gender.

In general, we are within our targets for the total workforce and across various management levels. However, our Group Management is not currently in line with our targets (75% men). Our goal is to reach our target for Group Management by 2025.

# Our social and people targets

			ACTUAL 2022	2023	TARGETS 2024	2025
SOCIAL RESPONSIBILITY	CHARITY	Donation to Save the Children	SEK 0.521m	Min SEK 0.3m	Min SEK 1m	Min SEK 1m
	DESTINATION IMPACT	Share of local products in restaurants and bars at own operated hotels (average)	N/A	Min 10%	Min 17%	Min 25%
		Share of locally hired employees in own operated hotels	90%	Min 90%	Min 90%	Min 90%
PEOPLE	WORKPLACE	Employee engagement / eNPS	N/A	20	30	30
		Each own operated hotel shall participate in at least 2 local social activities per year	2.5 (27 in total)	Min 2	Min 2	Min 2
	DIVERSITY, INCLUSION & EQUAL PAY	No gender represented by more than 60% in total workforce (NLTG Group)	56% women	Max 60%	Max 60%	Max 60%
		No gender represented by more than 60% in C-level management	75% men	Max 70%	Max 70%	Max 60%
		No gender represented by more than 55% in C-level+1 management	59% men	Max 60%	Max 55%	Max 55%
		No gender represented by more than 55% – all managers with direct reports	56% men	Max 60%	Max 55%	Max 55%

**CASE**

# For the wellbeing of those who need a voice

**As a company, we work to spread happiness by giving people the best weeks of the year. But we also work to promote the wellbeing of those who don't have a voice, through initiatives at our destinations and with global organisations. Here are some examples of our work in this area in 2022.**

## A SAFE CHILDHOOD WITH SAVE THE CHILDREN

Every year, thousands of children and families experience happy weeks with NLTG. Their holidays with us are a time of joy and celebration, when families can relax, and children can play and be together. But not every child is as fortunate. So, as a company, we take part in projects to protect, raise awareness and empower children to have a better and safer life.

For many years, we have been involved in a variety of projects at different destinations to improve conditions in schools, hospitals and orphanages. In 2022, we took this one step further through a long-term collaboration with Save the Children. Around the world, all too many children lack the most basic rights for a safe childhood. Together with Save the Children, we are now fighting for the right to a safe childhood for all children, regardless of where they grow up.

We already create safe and inclusive environments for children who travel on holiday with us. In 2022, we began working with Save the Children to train our staff to ensure this commitment is delivered consistently at every destination. We are also using various channels, such as our children's clubs, to increase knowledge about children's rights.

Our commitment to Save the Children includes an annual donation to support the organisation's work. Our customers also have the chance to donate when booking a trip with us.



Our two mascots Lollo & Bernie.

## SUPPORT FOR FAMILIES AND CHILDREN IN UKRAINE

In 2022, the war in Ukraine forced millions of children and families to flee their homes. These people needed food, housing, clean water and warm clothes. In response to the human crisis, Save the Children supplied fleeing families with food and shelter. It also set up safe spaces for children at border crossings, where they could play and recover from the traumatic experience of leaving their homes.

In 2022, we donated SEK 500,000 to support Save the Children's work in Ukraine. We also gave our customers and employees the opportunity to donate by establishing fundraising pages on our Swedish, Danish, Norwegian and Finnish webpages.



Photo: Save the Children.



### JOYFUL ANIMAL EXPERIENCES WITH WORLD ANIMAL PROTECTION

When many people travel, they want to experience nature and wildlife that they can't see at home. But much of the wildlife that people go on holiday to experience is endangered and needs to be protected. When they holiday with us, our customers can enjoy fantastic once-in-a-lifetime experiences with wild animals, safe in the knowledge that their experiences do not harm the animals involved. This has been our commitment for many years: we do not offer or promote experiences that we believe exploit or expose the animals to stressful or harmful conditions.

We believe that wild animals should be experienced in their natural environment. In 2022, we took this commitment to the next level when we adopted a new animal welfare policy with special focus on the exploitation of wild animals in captivity. We also signed a cooperation agreement with World Animal Protection. As part of the agreement, we are committed to only guiding our guests towards animal-friendly excursions that follow World Animal Protection's guidelines and our own animal welfare policy.

### JOINING THE FIGHT TO STOP TROPHY HUNTING

It is a sad fact that some tourists still want to engage in trophy hunting as part of their holiday experience.

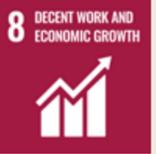
In 2022, we joined the rest of the global tourism industry when we signed an open letter from World Animal Protection to the South African government to put a stop to trophy hunting in the country. South Africa is a common destination for trophy hunters and the letter urges the South African government to promote the growth of responsible wildlife-friendly tourism to help finance wildlife conservation.




- SEK 521,000 has been donated to support Save the Children's work
- SEK 59,000 collected from customers and employees for Save the Children



5 GENDER EQUALITY



8 DECENT WORK AND ECONOMIC GROWTH



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



15 LIFE ON LAND



**CASE**

# Destination impact

**Thirty years ago, Makrigialos was a small fishing village with limited opportunities for young people. Today, it’s a thriving community, with a good economy driven by a vibrant tourist trade. The town is just one example of the positive impact our operations can have on local communities.**

A beautiful port town on the Greek island of Crete, Makrigialos is a popular destination for tourists from the Nordics and the rest of the world. Renowned for its hospitality, warm seas and cooling breezes, it is surrounded by rolling hills and olive groves and home to many fine restaurants, hotels and beaches.

Makrigialos has much to offer visitors and residents alike. But it was not always like this. When NLTG opened its first Sunwing hotel in the town in 1984, it was a small fishing village with just one school and limited work opportunities.

## TOURISM, OLIVE OIL AND RENEWABLE ENERGY

Makrigialos is located in the municipality of Sitia, a region in Crete renowned for its olive oil. But olive

cultivation has never been enough to generate the jobs and opportunities that the area needs. Growth has come from tourism, with investment in jobs, training and infrastructure driven by companies like NLTG. This has not just expanded the tourist industry, but also the municipality’s primary industries, as Georgios Zervakis , Mayor of Sitia, explains.

“Tourism has raised the standard of living across the municipality. Now we have an airport, hospital and schools, as well as a renewable power station that supplies 52% of Crete’s electricity. We also have a good port and a university. These have helped us develop our primary sector. Students can now learn how to take our raw materials and transform them into products for tourists or export.”

### THE POSITIVE IMPACT OF TOURISM

Makrigialos is by no means an isolated case. At NLTG, we feel a strong responsibility for the places where we have resorts and do all we can to ensure that our presence has a positive impact. We employ local people and purchase local goods.



**“30 years ago, the hills around here were deserted. Now they have hotels, visitors and tourism – and that has raised the standard of living of the people here. Everyday life has changed, jobs have been created. It is something that the people want.”**

– Georgios Zervakis, Mayor of Sitia

A view of our hotel Ocean Beach Club Crete in Makrigialos. The old fishing village has seen positive economic development since tourism entered.

We also work with local authorities to develop infrastructure that is beneficial for both tourists and residents. This can only be achieved through long-term commitment, which is why we sign hotel leases for a minimum of ten years. We also develop long-term relationships with our third-party hotels - and the majority of our charter hotels have been part of our portfolio for at least a decade. This brings stability to the people who work in or supply the resort, as it ensures a security of income that enables longer term investment.

Over the years, we have been proud to see the impact that our business can have on local communities. In 2022 alone, our operations brought over SEK 500 million into our local destinations through salaries, rent, procurement and hotel investment projects. In addition, it's estimated that our customers spent more than SEK 3 billion\* at local destinations when visiting with us. For towns like Makrigialos, this doesn't just mean income, it also increases opportunities that spread far beyond the tourist trade.

\*Statista.com estimates that a holidaymaker travelling to European destinations across the Mediterranean region spends approx. EUR 450 per week during the holiday.

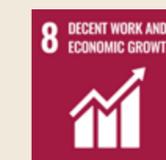


A swim-out suite at our own branded hotel Sunwing Makrigialos Beach.



## The global impact of tourism

In 2019 – before the slowdown caused by the covid-19 pandemic – the travel and tourism industry was valued at USD 9.6 trillion, roughly 10.3% of gross domestic product (GDP) globally.



**CASE**

# Service with a smile

**Across NLTG, more than one quarter of all employees have been with the company for two decades or more. What makes people stay with us for so long?**

When Savvas Savva started as a waiter in our hotel in Aiya Napa, Cyprus in 1987, he had no idea he would still be working in the same place 36 years later. Today, Savvas is Food & Beverage Manager for Sunwing Sandy Beach and Ocean Beach Club in Aiya Napa. Our resort there has grown and Savvas is now a key part of the management team, but his enthusiasm for the work remains.

“I have always enjoyed talking to guests and finding out about their culture. For me, this is a real pleasure. I also love the team here. In summer, I have colleagues from many different countries. We work as one team, we trust each other, and are encouraged by management to be curious, try new things and get better. It is a really good place to work,” he says.

**GENUINE, CURIOUS AND DEDICATED**

Over the years, Savvas has held a number of roles as he moved from waiter to his current position.

Throughout, he has been supported by his managers, given opportunities to train and develop and has been trusted to take on new responsibilities.

Today, a key part of his job is sharing what he has learned – managing and training the employees in the bars and restaurants in both our hotels at Sandy Beach, Aiya Napa. In this role, he is keen to ensure that younger employees have the same benefits and opportunities to improve that he has had.

“I love helping people to be better at what they do – and, of course, to be better people,” he says. “At NLTG, if you share the company values – if you are genuine, curious and dedicated – and you show a willingness to learn, you will get good feedback and opportunities to grow. I guess I am an example of that.”



NLTG's values.

**THE SECRET TO EMPLOYEE LOYALTY AT NLTG**

As a long-time employee in NLTG, Savvas is not alone. 56 of Savvas’ colleagues at our Sandy Beach hotels – around 30% of our employees there – have been with the company for over 15 years. Across the group, the numbers are similar. The average tenure at NLTG is 13 years, and one in four colleagues have been with the company for over two decades, despite around 30% of our workforce being new colleagues who joined us after the covid-19 pandemic. What is it that makes employees stay?

According to Fredrik Wessel, CPO, NLTG works hard to provide a good physical and psychological work environment, as well as fair labour and work conditions connected to local standards.

“Our key focus areas are ensuring high job satisfaction, inclusion and diversity, internal learning and career development. But perhaps the most important aspect of our approach is to keep a small company soul in the big company set up. When I meet colleagues across the group, they say the same thing: the company feels small, despite its size and geographical spread and we all live our company values: Curious, Dedicated and Genuine. We are friendly and inclusive, everyone is treated equally, and we can all speak up if



Savvas Savva, Food & Beverage Manager at the Sunwing Sandy Bay Beach hotel and Ocean Beach Club hotel in Aiya Napa, has been working with NLTG for 36 years.



Ocean Beach Club Cyprus is positioned next door to Sunwing Sandy Bay Beach. Savvas is Food & Beverage Manager for both hotels.

we see something that can be improved. It also helps that we have a clear purpose – we give our customers the best weeks of the year. This is a very emotional purpose and one that we can all understand and relate to,” he says.

NLTG’s People Promise says that ‘it should be fun, developing and rewarding to do a good job in NLTG’. Saavas is a good example of a colleague who has developed and grown within the company – and he is by no means the only one.

“Like Savvas, both myself and our CEO Magnus Wikner started our careers working in our hotels and destinations – and there are many more like us around the company,” Fredrik explains.



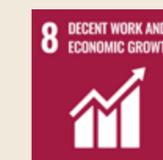
The team at Fino Kitchen at Sunwing Sandy Bay Beach.



The hospitality team at Ocean Beach Club Cyprus.

### Facts

	AVERAGE TENURE	LONGEST TENURE	+20 YEARS TENURE	NEW HIRES LAST YEAR
NLTG Total	13	54	27%	29%
Flight Crew (Cabin & Pilots)	17	48	47%	25%
Nordic Office + Ground Staff (HQ, ATR, Technicians)	12	49	27%	19%
Cyprus	9	40	21%	34%
Spain	8	54	16%	36%
Greece	10	42	21%	23%



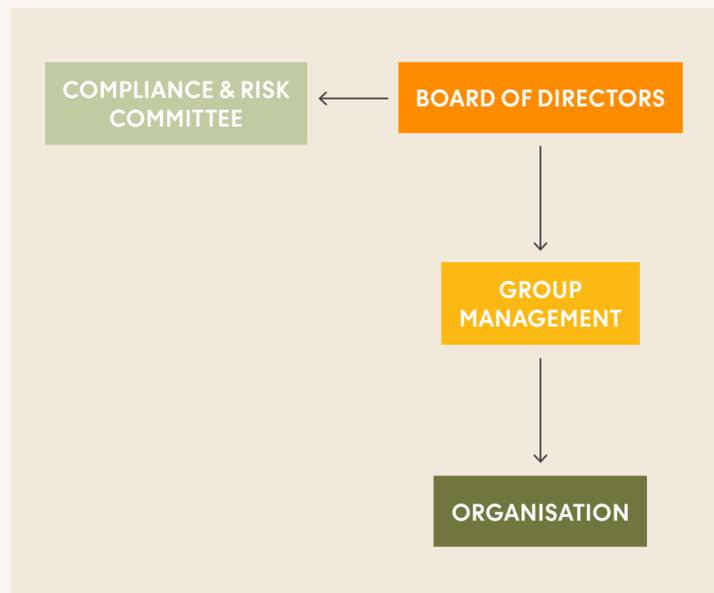
# GOVERNANCE



# Governance at Nordic Leisure Travel Group

**Our governance framework aims to ensure value creation, safeguard active and transparent management across NLTG and control risks.**

NLTG operates a two-tier governance structure ensuring a separation between Group Management and the Board of Directors.



## BOARD OF DIRECTORS

The Board of Directors has overall responsibility for the company’s organisation and for ensuring that the company’s affairs are administered in the company’s and all shareholders’ interests. This includes:

- Setting the overall strategy and business orientation, policies and goals for the operation of the group
- Supervision of Group Management and the company’s activities
- Setting a budget
- Appointing the Chief Executive Officer and deciding the Chief Executive Officer’s terms of employment
- Regularly reviewing the financial position and capital resources of NLTG to ensure that these are adequate
- Setting terms for incentive programmes for management and employees

The work of the Board is performed in accordance with the Swedish Companies Act aktiebolagslagen (2005:551).

## COMPLIANCE & RISK COMMITTEE

A Compliance & Risk Committee has been established, comprising members of the Board of Directors. The Compliance & Risk Committee is, among other things, responsible for:

- Quality assuring the company’s financial reporting and legal compliance
- The adequacy and efficiency of the company’s risk management structure
- The structure of the company’s internal control
- Review and approval of the company’s compliance policies

## GROUP MANAGEMENT

Group Management is responsible for the day-to-day management of NLTG, including:

- Recommending proposals for NLTG’s overall strategy, objectives and policies to the Board of Directors and their implementation
- Monitoring the performance of NLTG
- The organisation of the company and allocation of resources



Governance at NLTG

ESG governance

Special compliance conditions

Policies

Risk management in NLTG

Case: Worldfavor



# ESG governance

**Our sustainability and social responsibility work is governed by a number of policies and guidelines.** All policies are continuously adapted to suit the external circumstances and environment. These are anchored in our corporate governance structure and are reviewed and endorsed annually by the Compliance & Risk Committee.

**We manage and fulfil our ESG obligations** towards stakeholders and our own strategic objectives through policies and established management processes. We use relevant and current data as a basis for tracking our deliveries and improving our performance. At the beginning of the previous financial year, we implemented Worldfavor, a new Group ESG data tool that helps us gain a deeper knowledge of our impacts, challenges and results.

**Group Management is responsible for delivering on our ESG strategy and targets.** Our ESG team is responsible for developing our ESG strategy and target programme as well as supporting the organisation in delivering on these. On a quarterly basis, progress is reviewed and discussed with the Group Management team, and the CEO presents the overall results to the Board of Directors.

**Our risk assessments for ESG-related matters** follow the company's overall governance framework, which is managed from the organisation's legal unit.

**Crisis and emergency management** is organised centrally in the company with our 24-hour Duty Office function. Crisis and Emergency Management comprises Sunclass Airlines' Emergency Response Plans, as well as our tour operating and hotel activities' crisis function. The latter primarily focuses on handling and managing emergency situations for individual guests or groups of guests. It is in our DNA to take care of our customers in all situations, especially critical ones, when they are on a holiday with us. We did not have any crises within our ESG scope during the financial year 2021/22. During the year, we connected and trained our crisis management and customer functions to comply with policies such as animal welfare, child protection and GDPR. Our Crisis Management team is currently working to enhance our Business Continuity Management processes.

# Special compliance conditions

 **EXTERNAL AUDITING (ALL BRANDED HOTELS) - TRAVELIFE**

Travelife is a sustainability accreditation scheme, providing guidelines and measurement systems that contribute to improvements in environmental and social responsibility in the travel industry. Companies associated with Travelife must contribute to society by employing locally, using local suppliers and by marketing local businesses. They must also work against child labour and child sex tourism. Our work on the environment and social responsibility is followed up by the independent auditors of Travelife every two years.

 **EU-EED COMPLIANCE (TOUR OPERATOR BUSINESS)**

The EU Energy Efficiency Directive (EED) requires all major companies in the EU to map energy consumption and set goals for optimising energy systems going forward. The responsibility for ensuring compliance lies with the individual national authorities. The relevant entities in NLTG all comply with the requirements of EU EED.

 **EU-ETS COMPLIANCE (SUNCLASS AIRLINES)**

The EU Emissions Trading System (ETS) is a cornerstone of the EU's policy to combat climate change and is a key tool for reducing greenhouse gas emissions cost-effectively. The ETS works on the 'cap and trade' principle. The system also covers reportable carbon emissions from the aviation sector. NLTG operates its own airline, Sunclass Airlines, which is compliant with ETS requirements. Since the inception of ETS, our airline has conducted independent assessments of its fuel use and emissions for each year. The next process will be completed in the spring of 2023. The responsibility for data management and compliance lies with the airline's flight operations department in the head office in Copenhagen Airport, Denmark.

 **THE NORWEGIAN ÅPENHETSLOVEN**

On 1 July 2022, the Norwegian Åpenhetsloven came into effect. NLTG will be ready to comply with the law's reporting requirements by 30 June 2023. The law aims to ensure a company's social responsibilities, including human rights and decent working conditions, in its own organisation and in its supply chain.

 **THE DANISH ANNUAL ACCOUNTS REQUIREMENT FOR DIVERSITY REPORTING**

The Danish authorities require companies to report on diversity matters and objectives. All our Danish subsidiaries are covered by this requirement. Reporting of these matters is included in the annual financial reports. For other ESG reporting requirements imposed by Danish law, relevant details are reported in the parent ESG report.



# Policies

## CODE OF CONDUCT

The Code of Conduct is our main policy document, acting as an umbrella document for all other policies and guidelines. It applies to all employees and all areas of the business within NLTG. The policy covers a range of topics including our business values, behaviour within the company, health and safety at work, child protection, bribery, gifts and entertainment and more. Within all areas, the policy sets out the standard to which all employees and the business are expected to adhere, and what process to follow if any deviation from the code is discovered. Every employee within the Group is required by the Code of Conduct to be vigilant against breaches of the policy, and to report any deviations found.

## ANTI-BRIBERY AND CORRUPTION

Our Anti-Bribery and Corruption Policy includes a list of actions and circumstances that constitute warnings of potential corruption. It also clarifies our zero tolerance towards all forms of bribery and corruption, both internally and externally.

## SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct sets out the minimum standards of business behaviour expected of suppliers, who must have processes in place to monitor and maintain these standards, including in their own supply chains. The policy applies to everyone across the supplier organisation, in whichever jurisdiction they are located: employees, managers and directors, temporary workers and all third parties associated, and doing business, with us. The code covers, among other things: human rights, child labour, child protection from sexual abuse, forced labour, wages and benefits, fair treatment and equal opportunity, health and safety, anti-bribery and corruption, gifts and hospitality, and conflicts of interest.

To ensure that our policies are complied with, there is a whistleblowing function for reporting wrongdoing (illegal or unethical conduct) or malpractice.

## WHISTLEBLOWING

We want to do what is right. Whistleblowing provides an opportunity to report suspicions of serious misconduct. This is of great importance to us to protect our business, employees, partners, customers, the environment and society against serious irregularities that may be conducted by any company within NLTG or our employees. If serious irregularities can be found at an early stage, we have a better possibility to prevent risks and limit the damage – to the benefit of our business, employees and other stakeholders. NLTG enables anonymous reporting through a reporting channel managed by a third party, WhistleB. The reporting channel can be reached on any device, including smart phones. We recommend employees to access the channel from a device not connected to our intranet.

## GDPR POLICIES

At NLTG, we recognise that we all have a responsibility to look after the personal data of both our customers and colleagues. We want our customers and colleagues to trust us with their valuable personal information and have confidence that we will look after it. We must all be aware of, and comply with, data protection laws, not only because it is a legal requirement, but because it is the right thing to do. Our NLTG Data Protection Policy is an internal document for use within NLTG and applies to all colleagues in the Group. The policy explains how and why we manage personal data across the Group and is used as an instrument to ensure that all employees abide by the same rules and are aware of our legal obligations according to the General Data Protection Regulation (GDPR). The policy contains a short summary of what personal data is, data protection principles as well as information on individual rights, both as an employee and what rights our customers have. Furthermore, the policy contains information on where to turn should there be a security breach.

**HUMAN RIGHTS**

NLTG recognises the UN Guiding Principles on Business and Human Rights and supports the UN Convention on Rights of the Child. We are also aligned with the UN Global Compact. These globally agreed principles and programmes enable us to operate a structured approach to these issues across our global business. We are determined to further reduce the risk of human rights issues in our supply chain, and we continuously review our risk assessments, as well as our Supplier Code of Conduct.



**ENVIRONMENTAL POLICY**

NLTG has a dedicated environmental policy, which sets out goals for the business regarding the reduction of fossil fuel consumption within our own airline operations; measures to help us reduce resources, such as materials and products used in the supply chain; waste, energy consumption and heating reduction; reduced consumption of environmentally harmful chemicals; noise pollution; and conscious purchasing. The policy also describes our efforts on the emissions offset approach.

**CHARITY AND SOCIAL ENGAGEMENT POLICY**

Our Charity & Social engagement approach follows our Group sustainability strategy which aims to deliver positive footprints both at home, on the journey and on holiday. We focus our contributions toward the areas of human working conditions; health support in local and destination communities; climate and environmental care; and child welfare and education.

**CHILD PROTECTION POLICY**

At NLTG, we are fully committed to respecting children’s rights as set out by the UN Convention on the Rights of the Child. Our Child Protection Policy outlines the company standards that are in place to safeguard children, both our customers' children and children at local destinations. The policy outlines our commitment to provide adequate training, information, and support to customers and employees, reporting processes and investigation procedures to protect children from harm. We condemn all forms of sexual exploitation of children and support all acts of law made to prevent and punish such crimes. We demand that guests, partners, and all members of staff refuse to take part in sexual exploitation of children, and that they report any cases of sexual exploitation of children of which they become aware. Breaching this policy may result in dismissal, reporting to the police and the end of ongoing collaboration.

**ANIMAL WELFARE POLICY**

At NLTG, we care about the welfare and protection of both captive and wild animals, including animals that form part of tourist attractions or are impacted by tourism in another way. In 2022, we adopted a new Animal Welfare Policy with a special focus on the exploitation of wild animals in captivity. In addition, we signed a partnership agreement with World Animal Protection to strengthen our focus and commitment to this important area. The partnership includes a pledge to distance ourselves from all forms of exploitation of wild animals in captivity, including where the purpose is entertainment for tourists. This includes swimming with dolphins, watching shows with wild animals in captivity, riding or bathing with elephants, participating in photo opportunities with wild animals, etc. We also committed to guiding our guests to animal-friendly excursions that are approved by World Animal Protection and follow our own Animal Welfare Policy.

# Risk management in Nordic Leisure Travel Group

## At NLTG, risk management is a mindset of continuous risk-conscious vigilance.

Achieving our long-term purpose and business strategy requires a shared understanding of uncertainties, key risks and the overall level of risk exposure throughout the company.

Following the bankruptcy of the Thomas Cook Group, an interim risk management framework was adopted to identify and mitigate risks, using particulars from the Thomas Cook Group risk framework.

With the NLTG organisation maturing, the challenges it faces continuously change. Therefore, in 2022 we initiated a process to develop and implement a more suitable enterprise risk management framework that is fully founded in the organisation and will provide further value creation. This will further ensure that enterprise risk management becomes a structured, consistent and continuous approach to manage risk exposure, covering all types of risks across the entire organisation.

Going forward, risks will be analysed, adopting a holistic approach by ensuring cross-organisational participation.

The risk management policy and risk matrix will come on top of the existing emergency and crisis management structure already implemented in our operations.

**The objective of risk management is to support strategic business objectives, while appropriately managing risks.**



CASE

# Measuring impact and progress with Worldfavor

**At NLTG, we want to be a leader in the responsible travel industry – and we have clear plans and goals in place to make it happen. Now, thanks to the use of the Worldfavor platform, we can accurately measure, track and report on our progress.**

For many companies, the sustainability journey is still in its early stages. NLTG is no different. We have established very clear sustainability goals for our company, which extend across all areas of the ESG framework, from diversity and inclusion to waste management and emissions. However, for these goals to be meaningful, we must still work to fully understand our baselines, and we must track our performance as we move forward.

To accelerate our work in this area, we introduced Worldfavor in 2022 – a new ESG data management platform that ensures greater transparency and clarity in ESG reporting.

“Worldfavor enables the efficient collection, analysis and reporting of ESG data from across the Group,” says Kim Houmark, Head of Sustainability. “It has already provided us with a much better overview of

essential ESG matters, which will enable us to report on progress to our owners, employees and the public more accurately than before. But there is much more we can do with Worldfavor, and we’re looking forward to realising its full potential in the next few years.”

## PRECISE DATA COLLECTION AND ANALYSIS

A key benefit of Worldfavor is that it manages all ESG data points on both a local and global level. This enables each individual contributor – such as a single hotel – to see their own impact, while also allowing our ESG team to analyse performance across the entire Group. With this level of detail, we can better understand the impact of every individual initiative and adjust our approach to maximise positive impact.

This will have immediate benefits, but it also opens possibilities in the long term. For example, by collecting ESG data in one place, Worldfavor will enable us to track trends and analyse our impact over several years. Armed with this information, we can continuously find new ways to improve.

## BETTER INFORMED DECISIONS

We introduced Worldfavor in February and are using it across NLTG to track a wide range of ESG datasets. We

are now working to populate it with data from across all areas of our business, including from our suppliers. This will enable us to visualise, analyse and share data across our organisation – so we can make better informed decisions as we move forward with our ESG journey.

**"Tracking and measurement of our ESG objectives is crucial for us to achieve our ambitions and become the leading Nordic holiday company. Our ESG reporting system, Worldfavor is an important management tool to collect data seamlessly and automatically transform our findings into actionable insights for the entire organisation."**

— Per Knudsen, CFO Nordic Leisure Travel Group



## Empowering a sustainable future

Worldfavor is a global sustainability platform for global business networks. It connects organisations across the world so they can register, share, and gain valuable insights from sustainability and compliance data. The data platform leverages the latest technology to fuel and accelerate transparency and to empower sustainable decisions for businesses both internally and throughout the entire value chain. Worldfavor was founded in Sweden in 2016. It is represented in more than 130 countries and has more than 25,000 users.

# STAKEHOLDERS



# Our stakeholders

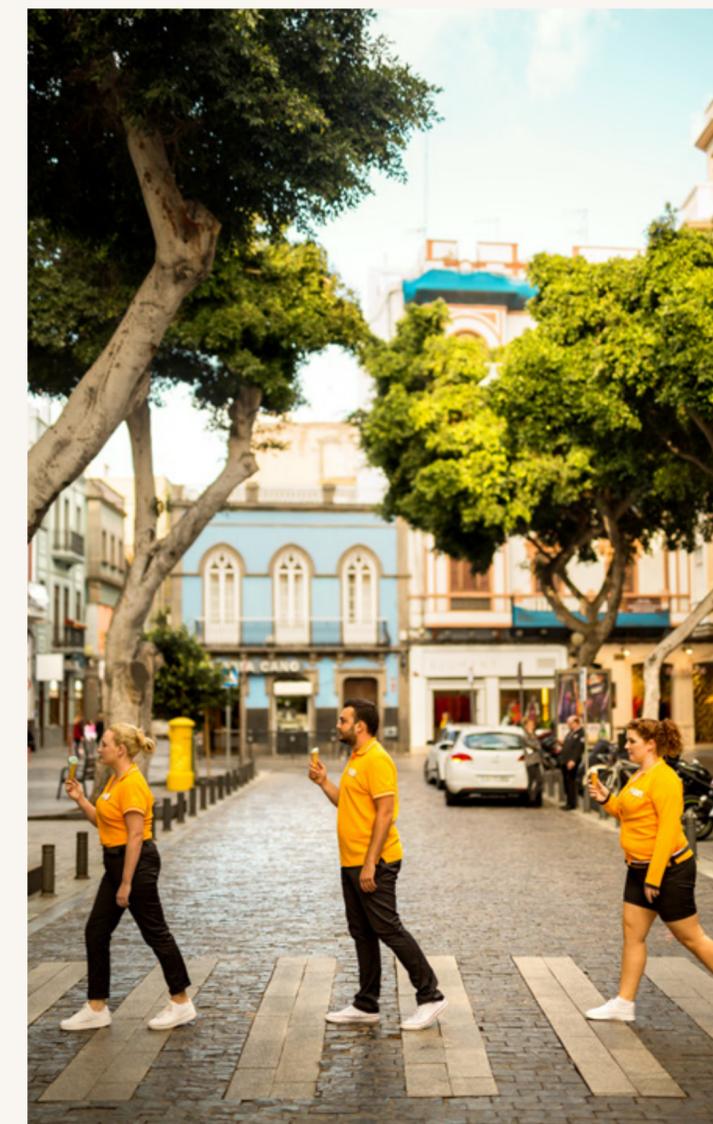
We cherish our close connection with our customers and employees which is essential for us to deliver on our business targets. We understand that a close working relationship with our business suppliers and investors, as well as a variety of industry organisations, is essential to bring about large-scale change. We define stakeholders as any group with potential or actual influence on our business. To ensure that we focus on the most material issues and those most relevant to our key audiences, we undertake a wide variety of stakeholder engagement activities, including meetings, questionnaires, newsletters with feedback channels and participation in projects and conferences.

## OUR STAKEHOLDERS INCLUDE:

- Customers
- Employees
- Investors
- Suppliers & partners
- Governments and regulators – national and on EU level
- Industry associations – travel and airline related

## NLTG AB, or Nordic subsidiaries of the company, is a member of the following industry organisations and associations:

- **SRF** - The industry association for the Swedish travel agencies and tour operators.
- **AIRE** - Airlines International Representation in Europe represents airlines. The association aims to make the operating framework for its members as efficient and cost-effective as possible, including consumer policies, taxation and social affairs.
- **Dansk Industri (DI)** - A privately funded business and employer organisation representing 10,000 member companies. Sunclass Airlines is a member.
- **BDL** – The industry association Dansk Luftfart (BDL - part of DI) is an industry policy funding point for companies in the Danish aviation sector.
- **Virke** - Virke is the main organisation for the trade and service industry and is the link between employers and the authorities.
- **SMAL** - Tjäreborg Finland is a member of the industry organisation SMAL, which looks after interests in the labour market.
- **Dansk Erhverv** - The Danish Chamber of Commerce is the network for Trade, IT, Industry and Service in Denmark.
- **RID** – The industry association for Danish tour operators.



# ESG DATA TABLES





# ESG development tracking

Collecting and analysing relevant data helps us understand the impact that derives from our operations and how we can develop and improve accordingly. Data is also crucial for us in order to comply with legislative requirements and keep our investors and other stakeholders updated on progress of our ESG strategies and projects. It provides valuable insight and understanding of vulnerabilities in certain situations and will help us navigate through potential crises.

We are currently in the transition between mapping and a fully developed systematization of our data processes. We have collected sustainability data for many

years, but this year we have initiated a comprehensive data optimisation project, which includes introducing Worldfavor – our new central data platform. We expect our data processes to be fully developed before the end of the fiscal year 2023.

We present our data in a table format in the following groups, **General, Environment and Social**, and have added relevant GRI indicators as guidelines.



ESG development tracking

**Data table - general**

Data table - environment

Data table - social

Supporting graphs: GHG emissions

**NLTG ESG | DATA TABLE - GENERAL** GRI indicators are used as guidelines for reporting of ESG data

RELEVANT GRI STANDARD / TITLE	GRI DISCLOSURE INDICATOR	BUSINESS THEME	2021/22	2020/21	2018/19
<b>GENERAL</b>					
Scale of organisation	102-7	Net revenue (SEK)		1,779,867	1,340,968
Information on employees and other workers	102-8	Number of employees as average over the reporting year	2,346	1,572	
Composition of the highest governance body and its committees	102-22.i	Total number of board members at the end of the reporting year	8		
Composition of the highest governance body and its committees	102.22.i	Total members of Group Management at the end of the reporting year	8		
Composition of the highest governance body and its committees	102-22.v	Total number of board members who identify as female at the end of the reporting year	2		
Composition of the highest governance body and its committees	102-22.v	Total members of Group Management who identify as female at the end of the reporting year	2		
Communication and training: Anti-corruption	205-2	Policies and procedures in place	100%	N/A	N/A
Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	206-1	Number of legal actions pending or completed	0	0	0

**NLTG ESG | DATA TABLE - ENVIRONMENT** GRI indicators are used as guidelines for reporting of ESG data

RELEVANT GRI STANDARD / TITLE	GRI DISCLOSURE INDICATOR	BUSINESS THEME	2021/22	2020/21	2018/19
<b>MATERIALS</b>					
Materials used by weight or volume	301-2	Recycled plastics / Biodegradable single-use items. Product produced based on recycled or biodegradable material (weight in tonnes)*	16,845	4,431	NA
<b>ENERGY</b>					
Energy consumption within the organisation	302-1.a	Brand hotel operations and office facilities: Non-renewable electricity (kWh)	8,156,069	11,574,482	18,936,999
Energy consumption within the organisation	302-1.b	Brand hotel operations and office facilities: Renewable electricity (kWh)	19,256,278	10,379,860	7,403,095
Heating consumption within the organisation	302-c.ii	Own facility operations: Heating (kWh)	714,851	729,214	303,515
<b>WATER AND EFFLUENT</b>					
Interactions with water as a shared resource	303-1	Water consumption in m <sup>3</sup> **	621,677	424,724	549,729
Interactions with water as a shared resource	303-4	Water discharge in m <sup>3</sup> ***	5,873		
<b>BIODIVERSITY</b>					
Significant impacts of activities, products, and services on biodiversity	304-2	Number of recorded negative impacts from business activities	0	0	0
<b>EMISSIONS</b>					
Direct (GHG) scope 1 emissions	305-1	Total business GHG emissions scope 1 (tCO <sub>2</sub> e)	341,506	79,508	519,047
Energy indirect (GHG) scope 2 emissions	305-2	Total business GHG emissions scope 2 (tCO <sub>2</sub> e)	2,130	6,221	8,394
Other indirect (GHG) scope 3 emissions	305-3	Total business GHG emissions scope 3 (tCO <sub>2</sub> e)	69	135	127
<b>WASTE</b>					
Waste generated	306.3	Total amount of registered waste (tonnes)	2,454	1,072	
<b>ENVIRONMENTAL COMPLIANCE</b>					
Non-compliance with environmental laws and regulations	307.1.i	Total monetary value of significant fines (SEK)	0	0	0
Non-compliance with environmental laws and regulations	307.1.ii	Total number of non-monetary sanctions	0	0	0
Non-compliance with environmental laws and regulations	307.1.iii	Cases brought through dispute resolution mechanism	0	0	0

**NLTG ESG | DATA TABLE - SOCIAL** GRI indicators are used as guidelines for reporting of ESG data

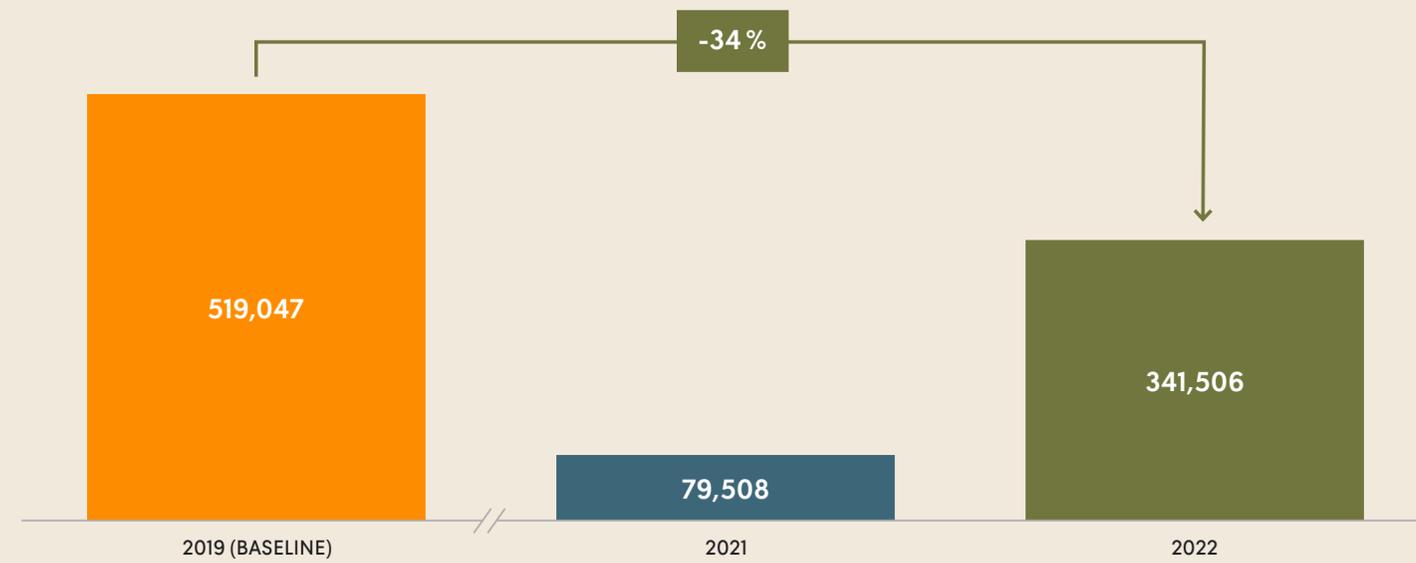
RELEVANT GRI STANDARD / TITLE	GRI DISCLOSURE INDICATOR	BUSINESS THEME	2021/22	2020/21	2018/19
<b>EMPLOYMENT</b>					
Total number and rate of new employee hires during the reporting period	401-1.a	Total net new hires (in FTEs) in the reporting year	566	See note	See note
Total number and rate of employee turnover during the reporting period	401.b	Employee turnover / attrition in the reporting year	18	See note	See note
<b>OCCUPATIONAL HEALTH AND SAFETY</b>					
Work-related injuries	403-9.i	The number of fatalities as a result of work-related injury	0	See note	See note
Work-related injuries	403-9.iii	The number of high-consequence work-related injuries (excluding fatalities)	0	See note	See note
Work-related injuries	403-9.iii	The number of recordable work-related injuries	2	See note	See note
Work-related ill health	403-10.i	The number of fatalities as a result of work-related ill health	0	See note	See note
Work-related ill health	403-10.ii	The number of fatalities as a result of work-related ill health	0	See note	See note
Work-related ill health	403-10.iii	The number of fatalities as a result of work-related ill health	0	See note	See note
<b>DIVERSITY AND EQUAL OPPORTUNITIES</b>					
Percentage and employee gender	405-1.i	Number of employees who identify as female (average over reporting year)	1,319	See note	See note
<b>NON-DISCRIMINATION</b>					
Discrimination incidents	406.1.A	Total number of incidents of discrimination during the reporting period	0	See note	See note
<b>SOCIOECONOMIC COMPLIANCE</b>					
Non-compliance with laws and regulations in the social and economic area	419-1.i	Total monetary value of significant fines	0	See note	See note
Non-compliance with laws and regulations in the social and economic area	419-1.ii	Total number of non-monetary sanctions	0	See note	See note
Non-compliance with laws and regulations in the social and economic area	419-1.iii	Cases brought through dispute resolution mechanisms	0	See note	See note

**Note:** Certain data in previous accounting periods are not fully available. This is due to the collapse of the former parent company, Thomas Cook Group, in autumn 2019. Data was previously registered centrally and was lost in connection with the bankruptcy. The data has not been possible to recreate. The following year was affected by covid-19 – there was very low activity and no new data systems were set up to collect this type of data.

# Supporting graphs: GHG emissions

## Total GHG emissions (tonnes) – Scope 1

Our direct emissions (scope 1) have dropped substantially since 2019, however the drop is primarily due to lower activity brought on by the covid-19 pandemic.



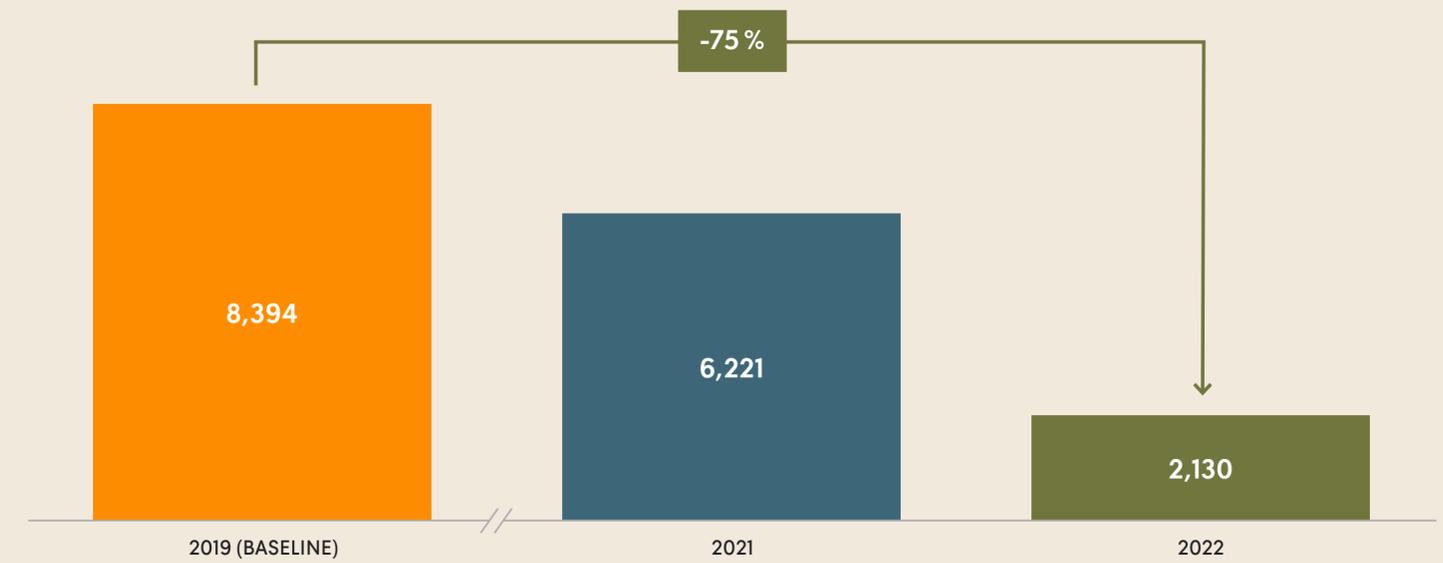
**99%**  
from our airline

**0.7%**  
from our hotels

**0.3%**  
from our offices

## Total GHG emissions (tonnes) – Scope 2

We have seen a dramatic drop in our scope 2 emissions. Some of the drop was due to lower activity levels. However, the main contributor was the switch to renewable electricity in 57% of our own operated hotels.



**97%**  
from our hotels

**3%**  
from our offices

# STATEMENTS, REFERENCES & CONTACT



# Internal sign-off statements

## NORDIC LEISURE TRAVEL GROUP HOLDINGS AB

### — GROUP MANAGEMENT

The Group management of NLTG is responsible for the assertions in this ESG report. The Group Management team have reviewed the content and has concluded that the information presented in this report is in full accordance with the company’s guidelines for good corporate governance, the applicable accounting rules, and obligations for ESG conditions, the overall strategic framework, and all other conditions defined for the company and its underlying products and activities.

Stockholm, 25 January 2023



Magnus Wikner  
CEO, Nordic Leisure Travel Group

## NORDIC LEISURE TRAVEL GROUP HOLDINGS AB

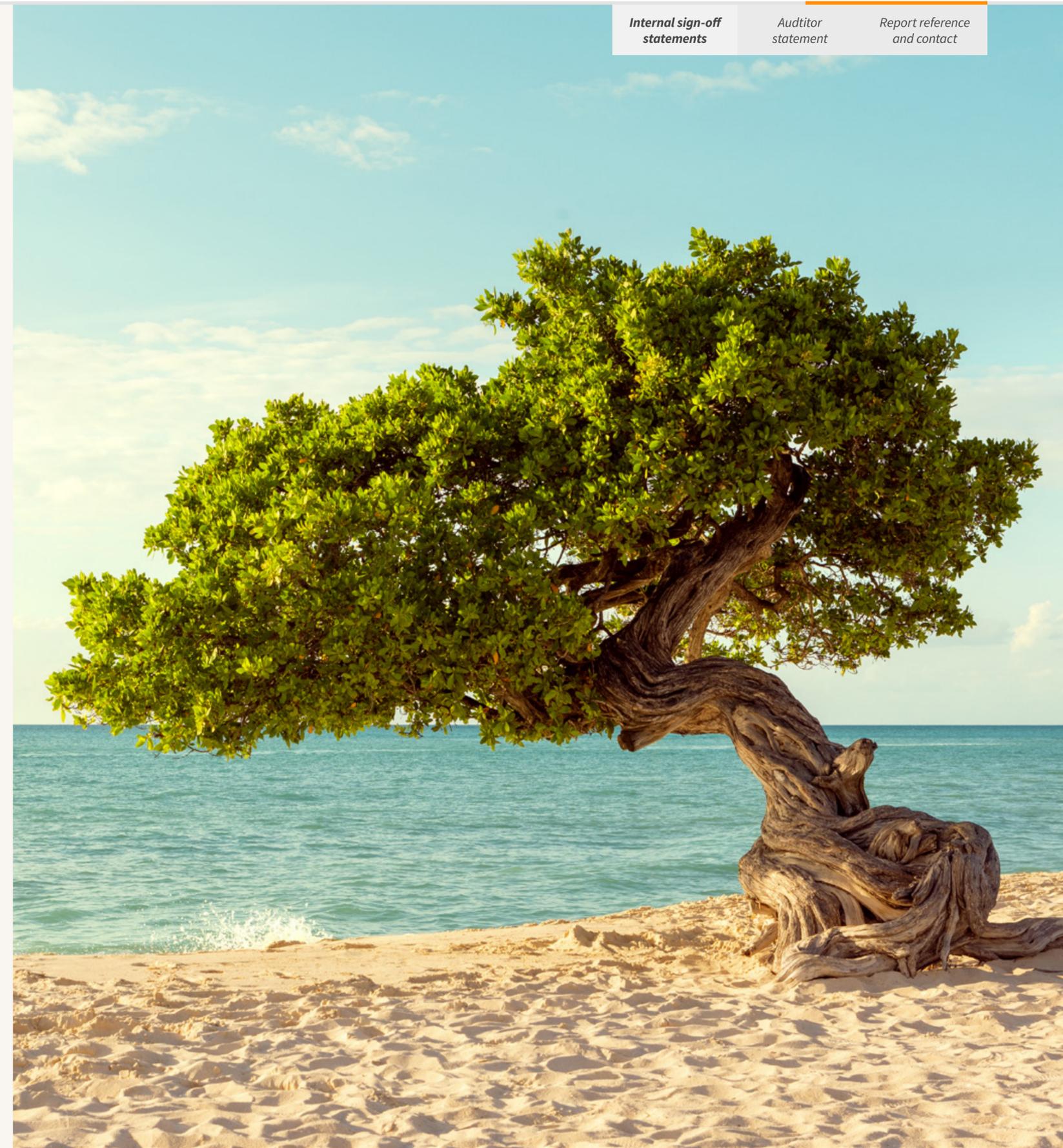
### — COMPLIANCE & RISK COMMITTEE

The Risk & Compliance Committee works to ensure that the Group Management and the company complies with relevant applicable legislation, that the company is run in the most considerate way and under conditions set by the Board of Directors, and that the interests of the investors and other stakeholder groups are safeguarded. The members of the Committee have on behalf of the Board of Directors reviewed the content and has concluded that the information in this report is presented in full accordance with the mentioned conditions.

Stockholm, 25 January 2023



Clara Zverina  
Director, Altor



# Auditor statement

To the general meeting of the shareholders in NLTG Holdco AB, corporate identity number 559222-2789

## ENGAGEMENT AND RESPONSIBILITY

It is the board of directors who is responsible for the statutory sustainability report for the year 2021/22 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, 25 January 2023



Bo Lagerström  
 Authorised Public Accountant,  
 Öhrlings PricewaterhouseCoopers AB

## The report covers NLTG Holdco AB including the mentioned affiliated companies (registered at the end of the financial year):

Country	Company name
Sweden	Nordic Leisure Travel Group Holdings AB
Sweden	Nordic Leisure Travel Group AB
Sweden	Ving SVE AB
Sweden	Sunwing Hellas AB
Sweden	NLTG HH Holdco AB
Sweden	NLTG HH Spain AB
Sweden	NLTG HH Greece AB
Denmark	Nordic Leisure Travel Group Denmark A/S
Denmark	Spies A/S
Denmark	Sunclass Airlines ApS
Denmark	Airshoppen Travel Retail A/S
Finland	Oy Tjäreborg Ab
Norway	Ving Norge AS
Greece	NLTG Hotels Hellas Single Member Private Company
Greece	Astral Hellas S.A.
Spain	V.R. España SA
Spain	Resorts Mallorca Hotels International SL (RMHI)
Spain	Airtours Resorts Ownership España SL (AROE)
Spain	Hoteles Sunwing S.A.
Spain	Movables Inversiones 2014, SLU
Cyprus	Sunwing Hotels Ltd

# Report references and contact

## More information about our ESG work and Annual Report

If you want to know more about our business and ESG work, we recommend that you visit our brand websites, where you can find the latest updated information.

[www.ving.se](http://www.ving.se)

[www.ving.no](http://www.ving.no)

[www.spies.dk](http://www.spies.dk)

[www.tjareborg.fi](http://www.tjareborg.fi)

[www.sunclassairlines.dk/fi/no/se](http://www.sunclassairlines.dk/fi/no/se)

[www.sunclass.airshoppen.com](http://www.sunclass.airshoppen.com)

## CONTACT US

Claes Pellvik, Head of Communications

[claes.pellvik@ving.se](mailto:claes.pellvik@ving.se)

+46 709 51 30 32

### NORDIC TRADE AND ASSOCIATION MEMBERSHIPS

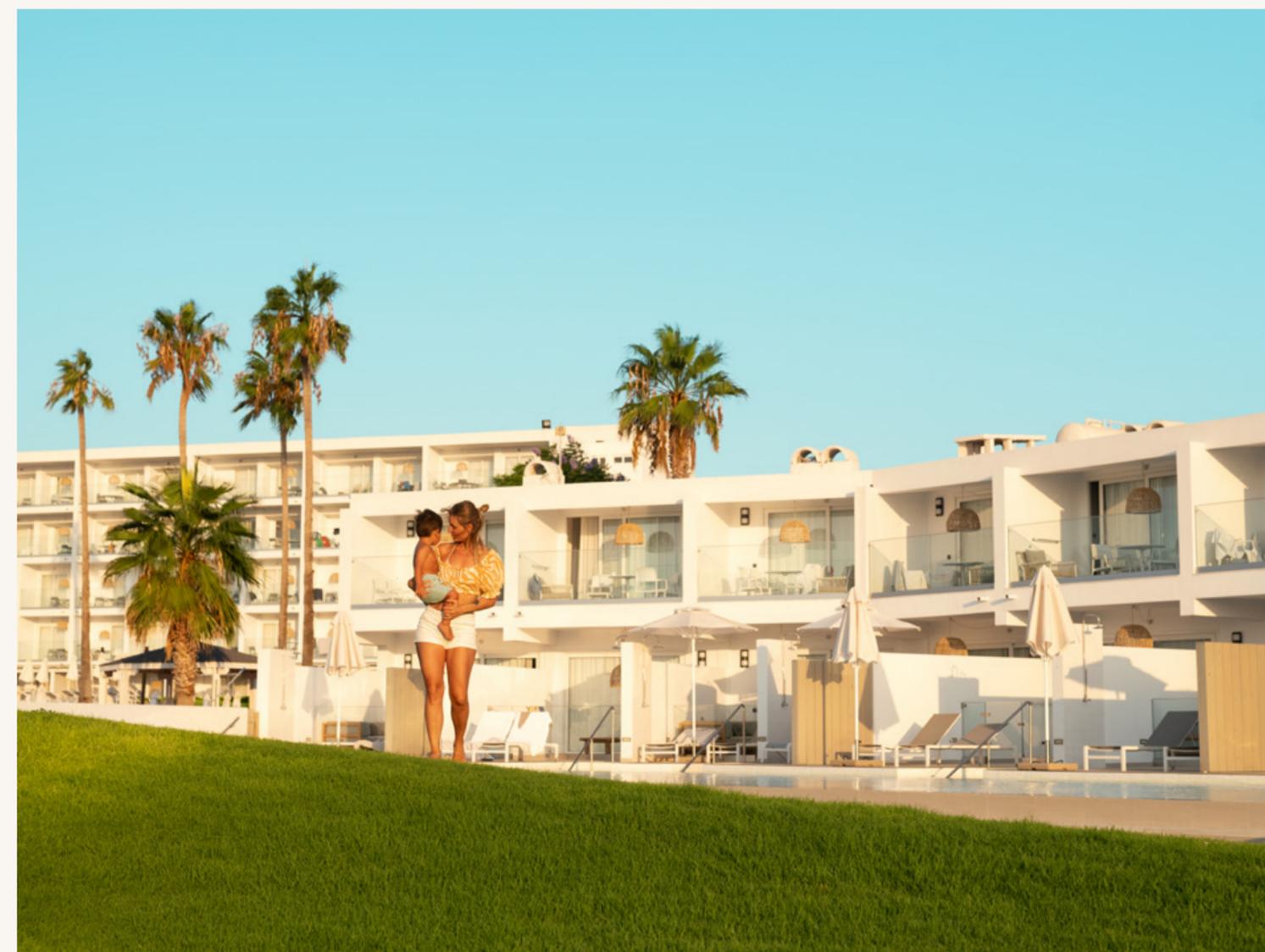
- [AIRE | Airlines International Representation in Europe](#)
- [Rejsearrangører i Danmark | RID](#)
- [Brancheforeningen Dansk Luftfart](#)
- [Branschföreningen för landets resebyråer och researrangörer - SRF](#)
- [Virke](#)
- [Suomen matkailualan liitto ry - SMAL](#)
- [Dansk Erhverv](#)
- [Dansk Industri](#)

### ESG RELEVANT PARTNERSHIPS

- [Nordic Electrofuel – Clean at scale](#)
- [ClimatePoint - Funding the future](#)
- [Arcadia eFuels](#)

### OTHER

- [United Nations Sustainable Development Goals](#)
- [Global Reporting Initiative – GRI](#)





  
Nordic Leisure  
Travel Group