



Precis sustainability statement 2025

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Introduction

At Precis, our mission is to help great companies thrive in the digital economy through data-driven marketing. As the digital landscape evolves, we recognise that our responsibility extends beyond delivering performance; it encompasses the ethical management of data, the well-being of our people, and the environmental footprint of the technology we utilise.

Our approach to sustainability

For Precis, sustainability is not a standalone initiative but an integral part of our operational excellence. This 2025 Sustainability Statement marks a milestone in our journey, as it is our first report prepared in line with the EU Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

Our strategy is built on the principle of **Double Materiality**. This means we report not only on how sustainability matters affect our financial value (Financial materiality) but also on how our business activities impact people and the planet (Impact materiality).

Key strategic pillars

Based on our 2025 assessment, our sustainability efforts are focused on five core areas where we have the greatest opportunity to drive meaningful change:

- **Climate & digital footprint:** Managing the carbon impact of our digital operations and advocating for a greener value chain in the tech industry.
- **Empowered workforce:** Maintaining a culture of well-being, inclusion, and continuous learning for our most valuable asset - our people.
- **Data ethics & consumer privacy:** Ensuring that our digital marketing practices uphold the highest standards of privacy and non-discrimination.
- **Responsible AI:** Proactively governing the deployment of artificial intelligence to prevent bias and ensure transparency in our marketing solutions.
- **Ethical business conduct:** Embedding transparency and integrity into our supplier relationships and internal governance.

Governance and commitment

The oversight of our sustainability strategy sits at the highest level of our organisation. Our Board of Directors and management team are committed to ensuring that Precis remains a resilient, ethical, and forward-thinking partner for our clients and a purposeful employer for our teams. We invite our stakeholders to explore this statement as a transparent account of our performance, our challenges, and our ambitions for a sustainable digital future.

Basis for preparation of the sustainability statement

The objective of this disclosure is to explain the principles and methods used in preparing the Group's Sustainability Statement, ensuring transparency, consistency with financial reporting, and alignment with the requirements of the European Sustainability Reporting Standards (ESRS).

Reporting framework

This Sustainability Statement has been prepared in accordance with the European Sustainability Reporting Standards (ESRS) adopted under the Corporate Sustainability Reporting Directive (CSRD) (Directive (EU) 2022/2464).

It constitutes the consolidated sustainability disclosures of the Group (as defined below) for the financial year 1 January – 31 December 2025, covering environmental, social, and governance (ESG) matters determined as material through the Group's double-materiality assessment in line with ESRS 1 and ESRS 2 (IRO-1 and IRO-2).

Reporting entity and consolidation principles

Reporting entity

This sustainability statement is prepared on a group consolidated basis for MayTwelve AB (organisation number 556947-1369), a Swedish limited liability company incorporated under the laws of Sweden (the "Parent Company"), and all subsidiary undertakings over which the Parent Company exercises control (the Parent Company and all subsidiary undertakings are collectively referred to as the "Group" or "Precis"), consistent with the financial consolidation principles applied in the Group's annual report under the Swedish accounting framework BFNAR 2012:1 (K3).

Reporting convention

The Group's primary operating activities are conducted through Precis Holding AB and its respective Swedish and international subsidiaries. Given that the Group's sustainability impacts, risks, and opportunities are primarily generated through these operations, the terms "Precis" and "Group" are used interchangeably throughout this statement to refer to the consolidated activities of MayTwelve AB.

Scope of consolidation

The scope of this sustainability statement is consistent with the scope of the consolidated financial statements of MayTwelve AB. It covers all entities over which MayTwelve AB exercises control, in accordance with the consolidation principles defined in the Swedish Annual Accounts Act and relevant financial reporting standards. No entities within the financial consolidation perimeter have been excluded from this sustainability statement.

The consolidated sustainability information therefore covers the Group and all subsidiaries over which the Group exercises control, as defined in Chapter 7 of the Swedish Annual Accounts Act (Årsredovisningslagen 1995:1554) and K3 Chapter 9 – Consolidated Financial Statements.

The Group operates internationally through subsidiaries that apply different national accounting frameworks, including US GAAP, UK GAAP, and other local GAAPs, depending on jurisdictional requirements. These entities are consolidated at Group level using uniform reporting principles aligned with the Parent Company's K3 framework.

The sustainability reporting boundary follows the same control approach as the financial consolidation and therefore includes all entities under the Group's control as of 31st of December 2025.

Unless otherwise stated, all quantitative and qualitative data reflect the aggregated performance of the consolidated entities. A list of consolidated subsidiaries is presented in Note XX – List of Consolidated Entities. Where an entity or associate has been excluded or proportionately included, the rationale is disclosed in the relevant ESRS topical section.

Scope and boundary of reporting

The sustainability reporting boundary defined above also incorporates material upstream and downstream value-chain activities where relevant impacts, risks, and opportunities occur. This includes key suppliers of cloud services, IT infrastructure, and office real estate; the Group's own workforce and operations; and downstream relationships with clients and end-users, particularly in relation to data privacy, ethical marketing, and responsible AI.

Where quantitative information for value-chain activities is incomplete, estimates and extrapolations are applied using transparent, consistent methodologies. The relevant topical disclosures describe data sources, estimation techniques, and limitations in line with ESRS 1 §§ 63–73.

The reporting period is 1 January – 31 December 2025, consistent with the financial year. In accordance with the transitional provisions of ESRS 1 (Appendix C), we have omitted the comparative information for the preceding 2024 reporting period in this first sustainability statement. Consequently, the disclosure of comparative information for metrics will commence from the 2026 reporting period onwards.

Materiality assessment

The Group's double materiality assessment was performed in accordance with ESRS 1 and ESRS 2 (IRO-1 and IRO-2). The process combined stakeholder engagement, and internal analysis to evaluate impacts, risks, and opportunities based on their severity, scale, and likelihood, as well as their potential financial effects.

The assessment identified the following topics as material for the 2025 reporting period: Climate change (ESRS E1), Own workforce (ESRS S1), Consumers and end-users (ESRS S4), Business conduct (ESRS G1), and the entity-specific topic Responsible AI.

The materiality assessment is reviewed bi-annually, with an annual validation review to confirm continued relevance in light of business developments, stakeholder expectations, and regulatory updates.

Data sources and methodologies

Data disclosed in this report are derived from internal management systems, HR databases, and environmental monitoring tools.

Energy consumption and greenhouse-gas (GHG) emissions are calculated in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and ESRS E1 (Climate Change), covering Scope 1, Scope 2, and, where material, Scope 3 categories related to cloud computing, employee commuting, and remote work.

Wherever possible, actual measured data are used; estimates are applied only where direct data are unavailable, based on credible methodologies and documented assumptions.

Social and governance metrics, including workforce composition, diversity, training, business conduct, and data ethics, follow ESRS S1–S4 and ESRS G1. Methodologies for data collection, definitions, and calculations are specified within the respective topical disclosure sections, and are applied consistently across entities to ensure comparability and reliability.

Assurance and verification

All sustainability information has undergone internal management review and validation within the Group's sustainability reporting control framework. The Group is committed to the continuous improvement of data quality, systems, and traceability, and intends to obtain limited external assurance on selected ESG indicators in forthcoming reporting cycles in line with CSRD Article 26 and ESRS 1 §§ 146–147.

Subsidiary reference framework

All subsidiaries included in the consolidated financial statements are covered by this Sustainability Statement. Accordingly, these entities are not required to prepare separate sustainability statements under the ESRS. Subsidiaries may refer to the Group's consolidated Sustainability Statement.

Disclosure requirement BP-2:

Specific information if the undertaking uses phasing-in options

Application of transitional provisions

As this represents Precis Group's first reporting period under the ESRS, the Group has applied selected transitional provisions as permitted by ESRS 1 Appendix C.

These include omitting comparative information for the previous reporting period, and limiting quantitative disclosures for selected Scope 3 emissions categories and non-material social topics (ESRS S2 and ESRS S3) as well as non-material environmental topics (ESRS E4).

Forward timeline

The Group will expand the completeness and granularity of quantitative data in subsequent reporting periods as systems mature and supplier data become available. Comparative disclosures are expected to be provided from the 2026 reporting cycle, with enhanced value-chain coverage by 2027.

Governance (GOV)

The objective of the Governance reporting area is to provide a thorough understanding of the Precis' governance processes, controls, and procedures used to monitor, manage, and oversee its material sustainability impacts, risks, and opportunities (IROs).

Disclosure Requirement GOV-1:

The role of the administrative, management and supervisory bodies in relation to sustainability

This disclosure details the roles, responsibilities, and oversight functions of our administrative, management, and supervisory bodies concerning material sustainability matters. The objective is to provide users with a clear understanding of the governance structure we employ for sustainability, including the specific bodies responsible for the strategic direction, target setting, and monitoring of material IROs.

Composition and diversity

By the end of 2025, the Board of Directors in May-Twelve AB was composed of two executive ordinary members and one non-executive external deputy. Consequently, by the end of 2025 there were no independent ordinary board members in MayTwelve AB and the board consisted of men only.

For Precis' operational business activities, the Board of Directors in Precis Holding AB (the "Board") holds ultimate responsibility for the long-term success of Precis and for overseeing the strategic direction, including sustainability-related impacts, risks, and opportunities. By the end of 2025, the Board was composed of six members, comprising two executive members (including the Group CEO and Group COO) and four non-executive members. Among the non-executive members, two represented investors and two were external.

Consequently, by the end of 2025 the percentage of independent board members was 33%. The Chair-woman was an external member. Regarding gender diversity, at the end of 2025, the Board consisted of **16.7% women and 83.3% men**. There is currently no formal representation of employees or other workers on the Board.

Roles and responsibilities

To ensure effective management of material sustainability matters, the Board is supported by a dedicated Sustainability Committee. This committee is composed of representatives from executive, disclosure management, and risk management functions. The specific allocation of responsibilities

is defined in the committee's Terms of Reference and the company's Sustainability Policy:

- **Environmental lead:** The Head of Finance and Control holds ultimate responsibility and oversees the company's environmental policy.
- **Social lead:** The Head of People leads on social topics, including diversity, equity, inclusion (DEI), well-being, and equal treatment.
- **Governance and AI lead:** The General Counsel is responsible for governance-related matters, including legal compliance and alignment with sustainability-related laws and regulations.
- **Chair:** The Group CBO is overall responsible for the sustainability statement and strategic integration.

The Sustainability Committee meets regularly as part of its schedule to review performance and may convene on an ad-hoc basis to review emerging risks or propose new targets.

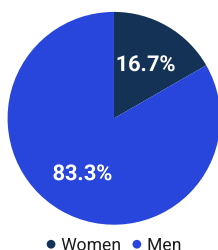
Operational management

Operational responsibility for sustainability implementation is held by the Chair of the Sustainability Committee. The committee is supported by cross-functional working groups representing Tech, People, Legal, and Finance. These groups facilitate the implementation of sustainability initiatives across the group.

Expertise and skills

At present, the Board of Directors does not include members with formal sustainability certifications or specialised environmental science backgrounds. However, the Board leverages the expertise of the Sustainability Committee and internal leadership working groups. Where specific technical knowledge is required - such as for climate data verification or specific CSRD compliance - Precis might consult external experts. To further strengthen oversight capabilities, training and capacity-building activities regarding sustainability governance are planned for the upcoming reporting year.

Gender diversity of the board, 2025



Disclosure Requirement GOV-2:

Integration of sustainability-related performance in incentive schemes

This disclosure aims to explain how sustainability performance is linked to the remuneration and incentive schemes provided to the members of our highest governing bodies.

Precis currently does not have incentive schemes for members of the administrative, management, or supervisory bodies that are directly linked to specific sustainability-related targets or performance metrics.

While opportunities exist for employees to become partners and shareholders in Precis, these incentives are based on the individual's overall contribution to the company's success and are not currently tied to specific environmental, social, or governance objectives.

Disclosure Requirement GOV-3:

Statement on due diligence

This disclosure aims to provide a clear statement on the main aspects and steps of our sustainability due diligence process applied across our own operations and value chain. The objective is to enable users to understand the process through which we identify, assess, prevent, mitigate, and account for actual and potential adverse impacts related to our material sustainability matters, consistent with international human rights and environmental frameworks.

Precis integrates sustainability due diligence into its corporate governance and operational strategies to identify, prevent, and mitigate adverse impacts. Our due diligence process allows us to manage risks across our own operations and value chain.

The following table maps the core elements of our due diligence process to the relevant disclosures within this sustainability statement:

Core elements of due diligence	Paragraphs/sections in the sustainability statement
Embedding due diligence in governance, strategy and business model	See GOV-1 (Governance structure) and SBM-1 (Strategy and Business Model).
Engaging with affected stakeholders in all key steps of the due diligence	See SBM-2 (Interests and views of stakeholders) and IRO-1 (Stakeholder engagement methodology).
Identifying and assessing adverse impacts	See IRO-1 (Description of the process to identify and assess material impacts, risks and opportunities).
Taking actions to address those adverse impacts	See GDR-A (Actions and resources) and specific topical disclosures (e.g., E1 Climate Change, S1 Own Workforce).
Tracking the effectiveness of these efforts and communicating	See GDR-M (Metrics) and GDR-T (Targets).

Disclosure Requirement GOV-4:

Risk management and internal controls over sustainability reporting

This disclosure focuses on the processes and systems established to ensure the reliability and quality of the sustainability information reported. The objective is to provide assurance regarding the scope, main features, and components of our risk management and internal control processes as they specifically relate to the preparation and presentation of the Sustainability Statement.

Scope and main features

Precis has established a risk management and internal control system to ensure the reliability of sustainability reporting. The process is coordinated by the Chair of the Sustainability Committee with oversight from the Sustainability Committee. Key components of this system include:

- **Centralised data collection:** Usage of standardised templates shared with functional leads (Tech, Legal, HR, Finance, Office coordinators) to ensure consistency.
- **Data ownership:** Defined data owners for each ESRS topic are responsible for providing, reviewing, and validating data points.
- **Validation:** A review process ensures alignment with regulatory requirements, supported by version control and documentation tracking for auditability.

Risk assessment methodology

Sustainability risks are identified and prioritised through our Double Materiality Assessment (DMA). We map potential impacts and financial risks across the value chain. Financial materiality is assessed based on the likelihood and magnitude of effects on revenues, expenses, assets, and liabilities, while impact materiality evaluates severity, scale, and remediability.

Principal sustainability risks & mitigation strategies

Operational risk management is distributed across relevant functions:

Supplier risks

Risks related to labor rights or environmental performance are managed via the Supplier Code of Conduct and monitored by the Sustainability Committee.

Client & reputational risks

Risks associated with ethically sensitive industries (e.g., fossil fuels, alcohol, defense) are evaluated during early stages of the sales process. High-risk cases are escalated to senior leadership.

Tech & data risks

Risks regarding data privacy, cybersecurity, and ethical AI use are managed by Tech, IT Security and Legal teams in alignment with relevant legislation, such as the GDPR and the EU AI Act.

Financial & compliance risks

Managed by the Finance team with oversight from the Head of Finance and Control.

Reporting to governance bodies

The findings from the risk assessment and internal control reviews are compiled by the Sustainability Committee, which meets regularly. Critical risks and material topics identified through the DMA are escalated to the Board of Directors as necessary for strategic oversight. The materiality assessment results are reviewed annually to ensure they remain integrated into the company's broader business strategy.

Strategy & Business Model (SBM)

The objective of the Strategy and Business Model (SBM) reporting area is to provide a clear understanding of how Precis' sustainability matters integrate with and affect our business model and strategy, and vice versa. The aim is to demonstrate how we are addressing the concept of double materiality.

Disclosure Requirement SBM-1:

Strategy, business model and value chain

This disclosure aims to detail the key elements of our general strategy, business model, and value chain. This analysis is crucial for outlining how these core components relate to or affect our material impacts, risks, and opportunities (IROs). By presenting this information, we aim to provide a comprehensive understanding of our exposure to these material matters and where they originate within our operations and extended value chain.

Company introduction

Precis is a global, award-winning digital marketing agency dedicated to helping brands navigate the complexities of modern marketing. Operating with a mission to "make marketing make sense," Precis integrates media, creative, data, and technology to drive measurable impact and long-term growth.

Renowned for our analytical heritage and data-driven approach, Precis focuses on simplifying complex marketing ecosystems, unifying fragmented channels, and delivering performance that matters. By combining deep technical expertise with strategic creativity, we help clients optimise their budgets, prove the value of their marketing efforts, and outperform competitors.

Our company strategy is fundamentally anchored in transparency and ethical business conduct. In an industry often characterised by complex supply chains and opaque pricing structures, the business model is a deliberate strategic choice to eliminate inherent conflicts of interest.

Core services

Precis offers a comprehensive suite of services designed to work as a unified ecosystem:

- **Media:** Strategic execution across paid search, paid social, and programmatic buying, ensuring budgets are invested where they yield the highest returns.
- **Data & Analytics:** From data engineering and data science to advanced tracking and governance, turning raw data into a competitive advantage and confident decision-making.
- **Creative:** Development of high-performing, data-backed creative assets tailored for digital speed and specific platform nuances.
- **SEO & CRO:** Future-proof strategies including Technical SEO, Search Experience Optimisation (SXO), and Answer Engine Optimisation (AEO) to enhance discoverability and conversion.
- **Alvie:** A proprietary performance marketing and attribution platform built to solve real-world challenges like attribution and budget allocation.

Sector classification and significance

Precis classifies its core business activities and identifies its significant sectors using the Statistical Classification of Economic Activities in the European Community (NACE). Based on our 2025 financial performance and double materiality assessment, the following sector is deemed significant:

NACE M73: Advertising and market research

Significance: This represents our primary revenue driver and core business model. It encompasses our digital marketing consultancy, technical implementation of tracking solutions, and the development of bespoke data tools for clients.

Justification for sector selection

We define a sector as "significant" if it meets one of the following criteria:

1. **Revenue threshold:** The sector accounts for more than 10% of our consolidated net turnover.
2. **Risk profile:** The sector is associated with high inherent sustainability risks or opportunities identified in our IRO assessment.

Key differentiators

- **Tech-driven & privacy-first:** Precis invests heavily in internal technology and AI-powered solutions while pioneering privacy-first marketing to ensure compliance without sacrificing performance.
- **Independent & client-centric:** As an independent agency, Precis remains agile and unbiased, aligning its teams strictly with client goals rather than third-party incentives.
- **Global reach, local expertise:** With offices across Europe and North America - including Stockholm, London, New York, and Austin - Precis combines global capabilities with local market insights.

Integration of sustainability: Our long-term business strategy is rooted in a commitment to responsible and sustainable growth, ensuring that our operations create positive societal and environmental outcomes while mitigating negative externalities. Sustainability is an enabling pillar of our strategy, not merely a compliance exercise.

We integrate sustainability into our business model by:

- **Purpose-driven growth:** Aligning business goals with our commitment to responsible marketing and ethical technology use.
- **Media buying transparency:** Rejecting intransparent principal-based buying and "Guaranteed CPM", providing full "net-to-publisher" transparency, ensuring every unit of media spend is accounted for without hidden markups and prioritising client ownership of data and platform accounts.
- **Risk and opportunity management:** Proactively identifying and managing material IROs to protect and enhance enterprise value.
- **Investment decisions:** Directing capital expenditure and R&D efforts towards sustainable solutions, such as transitioning to renewable energy and developing our AI governance framework.

Key elements of the strategy relating to sustainability	
Key element	Description
Significant groups of products and services	<p>Precis offers six significant groups of services. No material products or services were removed during the reporting period due to negative impact or risk. Services are continuously enhanced to address sustainability opportunities.</p> <p>Service Groups: Creative (Strategy, Production, Tech), SEO & CRO (Strategy, AEO, UX Optimisation, Copywriting), Data & Analytics (Measurement, Data governance, Predictive modeling), Technology (Platform development, Alvie), Media (Strategy & Planning, Media Buying, Reporting) and Marketing Science (Custom analytics).</p>
Significant markets and customer groups	<p>Precis operates as a global company group, primarily serving diverse customers across the Nordics, Europe and the US. No markets or customers were removed in the reporting period due to inherent risk, though our strategic goals may result in future portfolio adjustments. Our policy excludes clients in controversial industries such as gambling, religion, politics etc.</p>
Headcount of employees by geographical area	<p>Precis maintains offices across Europe and North America, operating with a total headcount of 512 employees by the end of December 2025. Our strategy is locally adaptive, empowering regional offices to implement sustainability measures relevant to their national and local context.</p>
Banned products and services	<p>No products or services offered by Precis are currently banned in any significant market where we operate.</p>

Sustainability-related goals

Precis’ strategy is built on the principle that long-term commercial success in digital marketing is inseparable from responsible data stewardship, transparent marketing practices and environmental efficiency. As such, we have integrated sustainability-related goals into our business model, products, and market positioning:

- **Carbon-efficient digital infrastructure (E1):** To remain competitive in a climate-conscious market, Precis aims to minimise the carbon intensity of our digital services. This involves prioritising collaboration with cloud providers who utilise renewable energy and optimising our data-handling practices to reduce the energy consumption associated with large-scale campaign deployments.
- **Leading employer in the digital sector (S1):** To remain the premier destination for top talent, we prioritise a high-performance culture underpinned by well-being and strong leadership. By embedding health standards and continuous learning into our operations, we mitigate material risks like stress and attrition, transforming our ‘world-class workplace’ vision into a sustainable competitive advantage.
- **Privacy-first marketing excellence (S4):** As the regulatory landscape for personal data continues to evolve, Precis positions itself as a market leader in privacy-centric advertising. Our goal is to develop and offer marketing solutions that go beyond baseline GDPR compliance, ensuring that our clients can reach their audiences without compromising individual privacy or contributing to algorithmic bias.
- **Ethical supplier & media governance (G1):** We aim to ensure that our media and technology supply chain reflects our ethical standards. By conducting robust due diligence on our partners, we safeguard Precis and our clients from legal and reputational risks associated with unethical business conduct or data misuse in the broader advertising ecosystem.
- **Pioneer in responsible AI governance (Entity specific topic):** Precis is integrating Generative and Predictive AI into the core of our service delivery. Our goal is to set the industry standard for Responsible AI by further expanding our ethics framework that prevents misinformation and bias, thereby creating a competitive advantage as a trusted advisor for clients navigating the AI transition.

Business model and value chain

Precis' core business model is centered on delivering measurable, data-driven growth for our clients through a blend of cutting-edge media, technology, and creative solutions. Our core competitive advantage is built upon three critical inputs, which are secured and developed through sustainability-aligned due diligence:

Input	Description	Approach to securing & developing input
Talent & expertise	Our primary asset: highly skilled, diverse employees in digital media, data analytics, tech, and creative.	Securing: Prioritising a strong company culture, competitive compensation, and adherence to high standards, including well-being, equal pay, and work-life balance.
Technology & data	Cloud services, proprietary tech and algorithms, our MarTech platform Alvie, and client campaign data.	Developing: Continuous R&D into proprietary platforms to increase client efficiency. Securing: Strict application of policies (combination of hard and soft policies), such as data minimisation frameworks, privacy-by-design, and our AI governance framework.
Digital infrastructure	Non-cloud IT hardware, office real estate, and purchased energy.	Gathering: Applying a formal supplier adoption and engagement process to prioritise certified and environmentally proactive vendors. Securing: Strategic commitment to 100% renewable energy sourcing for all offices (to the extent within our choice and control) and evaluating energy efficiency in real estate management.

Our operations generate three main outputs that, when successfully executed, translate into tangible, positive outcomes for clients, investors, and other stakeholders:

Output	Stakeholder	Expected outcome & benefit
Data-driven strategies	Clients	Measurable commercial growth and efficiency, reduced environmental impact from less wasteful digital campaigns, and enhanced brand equity through ethical, privacy-compliant marketing.
Proprietary technology & AI	Investors	Financial resilience through risk mitigation (e.g., avoiding fines from unethical or non-compliant AI use), competitive advantage via thought leadership in an emerging space, and long-term value creation.
Ethical marketing practices	Other stakeholders (Consumers & End-users)	Societal impact through the promotion of inclusive and non-discriminatory campaign content, robust data privacy protection, and raising the ethical bar for the wider digital media ecosystem.
High-performance culture & well-being	Employees (Own workforce)	Secure, high-quality employment in an inclusive environment; professional growth and skills through AI and digital skill development; and a safeguarded work-life balance that mitigates burnout risks.

Precis' value chain is analysed across three primary dimensions - upstream, own operations, and downstream - to accurately map where our most notable actual and potential impacts, risks, and opportunities originate:

Value chain component	Main features and business actors	Precis' position / IRO focus
Upstream	Involves suppliers of IT infrastructure (servers, hardware), cloud computing services, digital media and analytics platforms, office utilities (e.g., energy, water), and professional services.	This is the primary source of Scope 3 GHG emissions. Precis' position is as a large consumer of digital infrastructure, with an aim to engage key suppliers on their decarbonisation and human rights due diligence.
Own operations	Encompasses our global network of offices and our own workforce. Main actors are employees and landlords/property managers.	Focus is on minimising direct environmental footprint (foremost Scope 2 emissions, waste), and maximising positive social impact including mental health, work conditions, and skills development.
Downstream	Refers to the delivery of our services to our clients and the resultant effects on end-users and consumers and the broader digital media ecosystem.	This is the main point of impact for ethical concerns, including privacy, responsible marketing and the ethical use of AI. Our position is as an intermediary that can either enable or mitigate negative societal impacts through campaign strategy and content.

Disclosure Requirement SBM-2:

Interests and views of stakeholders

This disclosure aims to provide an understanding of our formal stakeholder engagement framework. We detail the processes and mechanisms established to systematically capture the interests and views of our key stakeholders. Crucially, this disclosure explains how these external perspectives are formally brought to

the attention of our administrative, management, and supervisory bodies. By outlining this integration, we demonstrate that stakeholder input is a vital, formal step in our governance structure, directly influencing and informing our overall strategy and business model to ensure a sustainable and responsive corporate direction.

Stakeholder engagement summary

Precis identifies its key stakeholders based on their involvement in our value chain, their exposure to our material impacts, and their ability to influence our financial performance. We maintain formal engagement mechanisms with all key categories to systematically capture their interests and views.

1/2

Stakeholder group	Primary rationale for engagement	Formal engagement mechanisms
Clients	Core business partners; directly impacted by our services (e.g., ethical marketing, data privacy) and a primary source of downstream financial opportunity and risk.	NPS surveys to systematically measure overall satisfaction, relationship health, and specific service feedback. Weekly and monthly meetings (apart from daily operational interactions) for deep, ongoing dialogue on performance, strategic requirements, and emerging sustainability expectations.
Investors	Providers of capital require clear, material information to assess the long-term viability, financial risks, and opportunities related to our sustainability performance (financial materiality).	Monthly reports that provide a structured, regular disclosure of operational, financial, and relevant sustainability performance data to ensure timely and comprehensive transparency.
Employees	Our own workforce; the central element of our value-creation model, with engagement focused on human capital management, working conditions, and rights, directly influencing our productivity and innovation.	Tertial eNPS surveys to measure employee net promoter score, sentiment, commitment, and proactively identify areas for improvement in the workplace and culture. Recurring meetings (e.g., team meetings, departmental and company reviews) to facilitate open dialogue and strategic alignment across the organisation. Variation of feedback forums (e.g., dedicated working groups, town halls) where employees are formally empowered to voice their views, input on strategy, and raise concerns.

Stakeholder group	Primary rationale for engagement	Formal engagement mechanisms
Suppliers and partners	Critical to the upstream value chain; essential for reporting on environmental (e.g., Scope 3 emissions) and social impacts and risks.	<p>Contractual & transactional terms: Formal contracts and service agreements are used as a core mechanism to embed expectations, including specific clauses related to legal compliance, data privacy, audit rights and ethical standards.</p> <p>Supplier code of conduct: Our supplier code of conduct establishes mandatory minimum social, ethical, and environmental standards. Compliance with this code will be expected for engaging in a business relationship.</p>
Consumers & end-users	The downstream value chain; the recipients of our advertising/digital services, directly affected by topics like data privacy, ethical marketing, and responsible AI	<p>Market sentiment monitoring: We carefully follow the overall ethical, social, and privacy-related sentiments in the markets where our clients operate, which acts as a proxy for broad end-user views on our industry's practices.</p> <p>Client feedback loop: We systematically capture and process aggregated feedback provided by our direct clients regarding end-user and consumer reactions, complaints, and ethical concerns, who serve as our primary conduit to downstream sentiment.</p> <p>Regulatory & policy tracking: Continuous monitoring of legislative and regulatory developments (e.g. GDPR and AI Act) and best practice publications that reflect societal and end-user expectations on digital services.</p>

Understanding of stakeholder interests

Our understanding of key stakeholder interests, as determined by our double materiality assessment and due diligence, is summarised below and forms the basis of our material IROs:

- **Own workforce:** Primary interests revolve around fair work, high health and safety standards, work-life balance, and access to training and skills development to future-proof their careers in a rapidly evolving digital landscape.
- **Clients:** The overriding interest is responsible marketing practices and data privacy. Clients need assurance that Precis' operations and advice will not expose them to compliance or reputational risk, necessitating clear governance around responsible AI and ethical campaign content.
- **Investors:** The central interest is the protection of long-term enterprise value. They prioritise the transparent identification of financial risks related to climate change mitigation, governance oversight, and the creation of revenue opportunities through sustainable products.
- **Consumers & end-users:** Key interests focus on the avoidance of harm, specifically non-discriminatory, non-misleading marketing, and the protection of privacy in all digital interactions.

Integration into strategy and business model

The interests and views of our stakeholders are to a large extent aligned with our current strategy and business model, demonstrating a clear link between engagement and our business' direction. Some examples of this are:

Informing the strategy

- **Client & consumer pressure on ethics:** Feedback from clients regarding brand safety and consumer sentiment on data privacy has directly informed our "Marketing Ethics" strategic initiative. This strategy moves beyond compliance to proactively position Precis as a leader in responsible media, ensuring we remain the partner of choice for privacy-conscious brands.
- **Employee demand for development:** Insights from our workforce regarding the impact of AI on their career trajectories have shaped our talent strategy. We are strategically pivoting towards AI-enabled upskilling, focusing on training our staff to leverage AI for high-value strategic work.
- **Investor focus on climate risk:** Investor expectations for long-term climate resilience have reinforced our strategy to decouple growth from emissions. This has solidified our strategic commitment to 100% renewable energy sourcing and the implementation of stricter vendor selection criteria for cloud providers.

Shaping the business model

- **Service offering adaptation:** Stakeholder demand for transparency has led to tangible changes in our Tech, Data & Analytics service offerings. We have integrated privacy-by-design and data governance audits as core components of our billable services, effectively commercialising sustainability compliance.
- **Client portfolio adjustments:** To align with the ethical values of our employees and the risk appetite of our investors, we have refined our business model to include stricter client screening processes. This includes a policy to exclude clients in controversial industries (tobacco, religion, etc.), thereby safeguarding our reputation and long-term social license to operate.
- **Governance as a product feature:** We are integrating our internal AI Governance Framework directly into our proprietary technology (Alvie). By doing so, we are transforming an internal control mechanism (governance) into a value-added feature for clients, differentiating our technology in a crowded market.

Governance oversight and information flow

The administrative, management, and supervisory bodies are formally informed about the views and interests of affected stakeholders through a structured process designed to ensure sustainability matters influence decision-making at the highest level.

The Board and executive leadership are primarily informed of stakeholder views and interests through the formal Double Materiality Assessment (DMA) process. In addition, stakeholder perspectives are considered on an ongoing basis through informal and operational channels. Throughout the year, employees across Precis engage with stakeholders and surface relevant insights, which are escalated via group management meetings.

Our Sustainability Committee, which aims to meet at least two times annually, brings forward material findings to the Board. If urgent or important matters arise outside of the scheduled meetings, the Sustainability Committee may convene additional sessions.

Disclosure Requirement SBM-3:

Interaction of material impacts, risks and opportunities with strategy and business model, and financial effects

This disclosure aims to establish a clear and detailed understanding of the interactions between our material impacts, risks, and opportunities (IROs) and the company's overall strategy and business model. We will explain how these material matters influence, and are influenced by, our strategic choices, as well as the actions we

are taking to manage them. Crucially, this disclosure connects sustainability performance with financial performance by providing a transparent presentation of the financial effects of these material IROs, presented at the appropriate level of aggregation (individually, aggregated, or at a topic level).

Material IROs and concentration in the value chain

The following material topics were identified through our materiality assessment and are concentrated as follows:

Material topic	ESRS standard	Concentration in value chain
Climate change mitigation & energy	ESRS E1	Primarily upstream (cloud service providers, data center energy use) and our own operations (purchased energy).
Own workforce	ESRS S1	Our own operations relate to the direct workforce (e.g., training and skills development, diversity, work-life balance, health, and safety).
Consumers & end-users	ESRS S4	Primarily downstream (client advertising campaigns, end-users) and our own operations (data infrastructure).
Business conduct	ESRS G1	Concentrated in upstream (management of supplier relationships, including payment practices) and our own operations (corporate culture, ethics, and governance processes).
Responsible AI	Entity-specific topic	Concentrated across our own operations (internal tool use) and downstream (client campaign optimisation).

Interaction with strategy and response

Our company’s long-term value creation is fundamentally linked to how we integrate material sustainability matters into our strategy and business model. This section provides a high-level description of the reciprocal relationship between our material impacts, risks, and opportunities (IROs) and our strategy, value chain, and core decision-making processes.

We recognise two key relationships:

- **Impacts originating from strategy:** Our strategic choices and business model inherently lead to actual and potential positive and negative impacts on people and the environment across our operations and value chain.
- **IROs affecting strategy:** Material risks and opportunities substantially affect, or may affect, our business model and strategy, influencing our ability to achieve our financial and non-financial objectives.

The way we have addressed or plan to address these material IROs is reflected in our policies, actions, and targets, which are detailed in the subsequent sections and across the topical ESRS. Further down in this statement, we also disclose information on the resilience of our strategy regarding its capacity to address these material risks.

Material impacts analysis	
Impact component	Disclosure
How impacts affect people or the environment	<p>Negative impact: Our business model relies on energy-intensive cloud services, indirectly contributing to GHG emissions (ESRS E1) and negative environmental impact, especially if providers rely on fossil energy.</p> <p>Positive impact: We promote ethical marketing and the responsible use of AI. Additionally, we foster a positive work environment but must continuously mitigate the potential for overwork or stress inherent in a project-based, digital services model.</p>
Connection to strategy and business model	<p>Direct connection. Our business model relies on real-time analytics, which inherently increases server activity and cloud resource use. This technological reliance directly contributes to the upstream energy-related impacts that are material to Precis. Furthermore, our competitive strategy relies on talent (ESRS S1), meaning the quality of our social impacts directly determines our ability to execute our strategy.</p>
Reasonably expected time horizons	<p>The environmental impacts of cloud-based emissions are ongoing (short- and medium-term), requiring management through supplier engagement. The social impact of advancing ethical AI is a continuously ongoing longer-term effort (beyond 5 years).</p>
Nature of involvement	<p>We are indirectly involved in the negative environmental impacts through our reliance on cloud providers and data aggregators whose energy sourcing we do not control, but whose services are essential to our operations. We are directly involved in all impacts related to ESRS S1 (employees) and are directly involved in ESRS G1 through our formal supplier contracts and internal governance.</p>

Financial effects and resilience

When it comes to current financial effects and resilience, Precis operates a digital-first, low-asset business model that has integrated sustainability principles since its inception. Consequently, the current financial effects of our material sustainability risks are primarily characterised by strategic cost avoidance. Unlike traditional industries, we do not require significant capital expenditure for carbon-intensive asset transition.

Instead, our sustainability-related expenditures are integrated into our recurring operational budget, covering areas such as our AI framework and compliance, data privacy framework and compliance, and employee well-being and skills development programs. This alignment ensures high financial resilience, as our core business model is fundamentally compatible with a low-carbon and socially responsible economy without requiring disruptive future investment.

Note: As of the reporting date, we have not identified any material impairments of assets resulting from sustainability-related impacts, risks, or opportunities. Specifically, climate-related transition risks have not shortened the useful lives of our IT infrastructure, and no social or governance-related incidents have occurred that would impair the carrying value of our intangible assets or goodwill. We continue to monitor our asset base against the material matters identified in our IRO assessment to ensure financial resilience.

Moving on, for most material risks and opportunities we are currently unable to provide quantitative information about their **anticipated** financial effects over the medium- and long-term due to the following reasons:

- **High measurement uncertainty:** The level of measurement uncertainty involved in reliably estimating the long-term financial effects is considered too high. For instance, modeling the precise financial impact of certain climate-related physical risks requires assumptions about future market developments and regulatory changes that lack reasonable and supportable inputs at this stage.
- **Non-separable effects:** The financial effects related to certain sustainability topics, such as a systemic shift in social license to operate, are not separately identifiable from those related to other topics or broader business factors.

Qualitative disclosure

While we cannot provide quantitative figures, we provide the following qualitative information regarding the anticipated financial effects of these risks.

We anticipate that the material risks related to Climate change (ESRS E1), Own workforce (ESRS S1), and Responsible AI are likely to affect the following line items within our financial statements:

Financial statement	Line item / Total likely to be affected	Description of anticipated effect
Statement of comprehensive income	Operating expenses (Costs)	Anticipated increase in operational costs due to the need to continue to invest in talent retention and upskilling programs, AI governance frameworks, and supplier decarbonisation engagement (medium-term).
Statement of cash flows	Capital expenditure (Investing)	Expected cash outflow for proprietary technology development and data infrastructure upgrades to ensure continued high resilience and regulatory compliance (short- to medium-term).

Resilience of strategy and business model

The resilience of our business strategy and model was tested against our five material topics using specific stress-test scenarios covering short-term (6–18 months) to medium-term (3–5 years) horizons. The scenarios were designed to model concurrent, severe impacts, covering both financial risks and risks to people and the planet (impact materiality).

The overall assessment determined that the current strategic framework is generally resilient to the scenarios tested, primarily due to existing policies, reliance on secure third-party infrastructure, and a human-centric corporate culture. However, the assessment also identified strategic gaps that necessitate adjustments to maintain this resilience over the long term.

Methodology

The assessment was conducted as a specialised, stress-testing exercise to evaluate the robustness of our current business strategy and model against the most important sustainability matters, as identified in our double materiality assessment. This qualitative assessment is required to provide stakeholders with an understanding of our capacity to manage material risks and adapt to a changing environment.

Materiality basis

- **Foundation:** The scope of the assessment was strictly limited to the five sustainability topics previously identified as material through the double materiality assessment:
 - ESRS E1 – Climate Change
 - ESRS S1 – Own Workforce
 - ESRS S4 – Consumers and End-users
 - ESRS G1 – Business Conduct
 - Entity specific topic – Responsible AI
- **Double materiality principle:** Each topic was selected because it presents both a material Impact (affecting people or the environment) and a material Financial risk/opportunity (affecting the company's financial performance and position).

Scenario-based stress testing

The core of the methodology involved scenario analysis, which is a best practice for assessing resilience, particularly for risks like climate change. This approach helps explore a range of plausible future conditions without making firm predictions.

- **Scenario design:** For each material topic, a specific, high-impact stress scenario was developed to test the limits of the current strategy.
- **Time horizons:** The scenarios considered impacts across defined time horizons:
 - Short-term: 6–18 months.
 - Medium-term: 1–5 years.
- **Scope definition:** The scope of resilience (own operations vs. value chain) was explicitly defined for each topic before the analysis to ensure focus.

Assessment and response

The internal workshop team followed a structured three-step analytical process for each scenario:

1. **Analyse current strategy:** Assess how the current business model, policies, and actions (P.A.T.s) would perform under the stress scenario. The result determined if the strategy was deemed Resilient or Not Resilient.
2. **Identify gaps:** Pinpoint specific areas where the current strategy, resources, or policies were inadequate or would fail to prevent significant financial or impact severity. This step drove the subsequent strategic adjustments.
3. **Determine strategic adjustments:** Based on the identified gaps, the team outlined key strategic adjustments necessary to enhance resilience, such as policy formalisation, new governance structures, or changes in resource allocation.

Resilience assessment key findings

Material topic	Scenario stress test	Time horizon	Current resilience finding	Strategic gaps & adjustments (Strategic response)
ESRS E1 – Climate Change	Expanded carbon pricing and high energy costs, impacting both operations and clients.	Medium-term (3–5 years)	Resilient (Operational costs can be absorbed/mitigated)	Gap: Exposure via high-emitting clients. Adjustment: Formalise and strengthen guidelines and risk-screening processes for high-emitting clients to manage downstream exposure.
ESRS S1 – Own Workforce	30% spike in senior talent turnover due to workload/lack of diversity, leading to service disruption.	Short-to-medium term (1–3 years)	Resilient ("Able to manage") but acknowledged a high dependency on key personnel.	Gap: Risk of voluntary turnover undermining capacity. Adjustment: Review of compensation and benefits to enhance retention. Strategic integration of AI to augment roles by automating routine tasks. This increases delivery capacity and accelerates the transition of talent into high-value strategic functions.
ESRS S4 – Consumers & End-users	A significant cloud vendor suffers a widely publicised security flaw, resulting in the exposure of anonymised (but re-identifiable) consumer data for a major client.	Short-term (6–18 months)	Resilient (Minimal user data stored; reliance on secure, large cloud providers like Google Cloud Platform).	Gap: High reliance on a single, secure major vendor (Google) poses a systemic dependency risk. Adjustment: Further enhancement of our AI governance (addressed under Responsible AI) is the key adjustment for S4 risks.
Entity specific topic – Responsible AI	AI tool discriminates against a protected group; contributes to a major fine and service suspension.	Short-term (6–18 months)	Resilient (covered by by existing compliance controls and AI ethics protocols, but needs additional adjustments).	Gap: Need to further enhance the granularity and formalise the scaling of existing policies and training frameworks to address the rapid evolution of AI-specific risk categories and emerging regulatory standards. Adjustment: Clarify and expand existing guidelines, policies and processes around discriminatory AI development and deployment in our unified AI Ethics Framework. Mandate the formal relaunch of the Marketing Ethics Group for heightened vigilance and oversight. Scale mandatory training/upskilling for client teams on ethical AI use to ensure market leading deep operational competence in new AI-specific risk mitigation and evolving global regulatory landscape.
ESRS G1 – Business Conduct	Regulatory investigation and suspension of key service due to governance failure around data/AI ethics.	Short-term (6–18 months)	Resilient (covered by by existing compliance controls and crisis management protocols, but needs additional adjustments)	Gap: The need to further specialise existing crisis management protocols to address the specific procedural requirements and "on-the-ground" response needs of complex regulatory inquiries. Adjustment: Finalise and integrate a dedicated Regulatory Response ("Dawn Raid") Policy into the Group's existing business continuity framework; establish a cross-function response team to ensure highly coordinated, legally compliant management of external investigations.

Changes to material IROs

As this is our first materiality assessment under the European Sustainability Reporting Standards (ESRS), a baseline is being established in this reporting period. Changes to the material impacts, risks, and opportunities will be disclosed in future periods.

Impacts, Risks, and Opportunities (IRO)

The objective of the IRO reporting area is to provide an understanding of how Precis manages its material sustainability-related impacts, risks, and opportunities - specifically through the use of policies, actions, and targets (PAT). This section establishes the direct link between the strategy (SBM) and the performance metrics which are reported in the subsequent topical standards.

Disclosure Requirement IRO-1:

Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported

This disclosure aims to provide a transparent description of the methodology used to determine the sustainability topics included in this report. This ensures that the report is stakeholder-relevant and financially pertinent. The objective is to explain the double materiality assessment process used to arrive at our final list of material topics and confirms that we have considered materiality from two perspectives: Impact materiality and Financial materiality.

Overview of the process

We conducted our first formal double materiality assessment in 2025. This comprehensive process was designed to combine stakeholder perspectives, external risk mapping, and internal impact scoring across our own operations and key supplier relationships. This ensures that the final selection of material issues accurately reflects both the most significant impacts on people and the environment, and the matters with the greatest potential financial effect on our company.

Detailed disclosure of methodologies and procedures

Methodologies and assumptions applied

We utilised a structured double materiality matrix based on EFRAG guidance. Each potential sustainability topic was scored using a dual axis:

1. **Impact materiality:** Scored based on the severity and likelihood of the actual or potential negative impact (e.g., magnitude, scale, and remediability).
2. **Financial materiality:** Scored based on the likelihood, magnitude, and nature of the financial effects (on assets, liabilities, revenue, or expenses) arising from sustainability-related risks and opportunities.

Key assumptions: The assessment was conducted under the assumption of steady-state operations across our core geographies and our continued, essential reliance on third-party cloud providers for data infrastructure and service delivery.

Process for identifying, assessing, prioritising, and monitoring impacts

Our process to identify and assess impacts on people and the environment is closely integrated with our human rights and environmental due diligence procedures:

- Focus on heightened risk: We prioritised activities with inherent risk, specifically those requiring high computational and data usage, such as the deployment of new AI tools. We also focused on business relationships with major cloud providers (due to their relatively high energy consumption).
- Involvement through operations and business relationships: We holistically considered impacts from:
 - Our own operations: Direct impacts, such as employee well-being (e.g., mental health risk) and travel-related emissions.
 - Business relationships: Indirect impacts, most notably the high energy usage and associated GHG emissions of our key cloud and data center providers (a material Scope 3 impact).
- Consultation with stakeholders and experts: We conducted structured stakeholder interviews with internal groups, including employees (across multiple regions and roles) and clients, to understand how they may be affected by our value chain. We also engaged external sustainability experts to validate our assessment of social impacts and emerging regulatory risks.
- Prioritisation of negative impacts: Negative impacts were prioritised based on a matrix scoring their relative severity and likelihood. This confirmed that issues such as energy-related emissions, data ethics, and DEI (diversity, equity, and inclusion) scored highest and were selected as core material matters for detailed reporting.

Process for identifying, assessing, prioritising, and monitoring financial risks and opportunities

Our process for assessing financial materiality connects sustainability matters to the potential effects on our financial condition and performance:

- Connecting impacts and dependencies to financial effects: Our dependence on data infrastructure was explicitly linked to both a climate impact (indirect emissions) and a financial opportunity (efficiency gains from migrating to greener, optimised servers and service tiers).
- Assessing likelihood, magnitude, and nature of effects: We scored each identified risk and opportunity on a 3×3 matrix (likelihood x financial severity) over short, medium, and long-term horizons. We applied qualitative judgment to adjust scores for topics involving uncertain, but high-impact regulatory developments in the EU (e.g., the EU AI Act).
- Prioritising sustainability-related risks: Sustainability-related risks were incorporated into our overall company risk register and will be regularly reviewed with other business and financial risks to ensure a holistic prioritisation.

Decision-making process and related internal control procedures

The results of the IRO assessment were reviewed and validated by our Group CBO (acting as Chair of the Sustainability Committee) and our Head of Finance and Control. Final prioritisation of material matters was approved by our Board and subsequently documented in our risk control framework.

- Integration into overall risk management process: ESG risks are part of our broader enterprise risk framework, reviewed alongside cyber, legal, and operational risks.
- Integration into the overall management process for opportunities: Opportunities such as low-emission digital innovation and employee retention through well-being initiatives are integrated into our business planning and OKRs.
- Input parameters: Inputs included internal HR and travel data, cloud usage analytics, interviews with department leads, and industry benchmarks. The scope covered all of our operations.
- Changes compared to the prior reporting period: This was our first formal double materiality assessment. We expect to revise the process in 2026 by introducing automated data capture and expanding stakeholder involvement.

Disclosure Requirement IRO-2:

Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement

This disclosure presents the final results of the double materiality assessment and provides a clear map of our subsequent reporting content. The objective is to provide a consolidated list of the material sustainability topics identified and to demonstrate the connection between those topics and the specific ESRS Disclosure Requirements included in this sustainability report.

Material topics were selected based on stakeholder input, severity and likelihood scoring, and alignment with ESRS 1 section 3.2. Topics scoring above the set relevance threshold were included in full; those scoring below were omitted or referenced as not material.

Summary of double materiality assessment (DMA)

Topical standard		Topic is material from an impact perspective	Topic is material from a financial perspective	Topic is not material
ESRS-E1	Climate Change	✓	✓	
ESRS-E2	Pollution			✗
ESRS-E3	Water & Marine Resources			✗
ESRS-E4	Biodiversity & Ecosystems			✗
ESRS-E5	Resource Use & Circular Economy			✗
ESRS-S1	Own Workforce	✓	✓	
ESRS-S2	Workers In The Value Chain			✗
ESRS-S3	Affected Communities			✗
ESRS-S4	Consumers & End-Users	✓	✓	
ESRS-G1	Business Conduct	✓	✓	
Entity Specific Topic - Responsible AI		✓	✓	

Material topics

ESRS E1

Climate Change

Impact materiality

Assessed as high severity due to the nature of greenhouse gas (GHG) emissions directly contributing to global warming. The core negative impact stems from the value chain's high energy dependency (scope 3), specifically in computing, cloud infrastructure, and data storage required for digital marketing services. The scale is significant as it extends across the entire value chain. The high remediation potential (4 out of 5) means we have a relatively strong capacity to effect change through renewable energy adoption and supplier engagement, underscoring its material responsibility.

Financial materiality

The primary financial risk is categorised as an expense risk with a high materiality score, linked to transition risks. This includes potential increases in operating costs due to carbon pricing mechanisms or taxes on fossil fuel use. Furthermore, failure to align with the global 1.5°C pathway poses a long-term risk of losing access to investment opportunities or facing higher capital costs, as clients and investors alike increasingly apply climate-aligned screening criteria.

ESRS S1

Own Workforce

Impact materiality

This topic is material due to both positive and negative impacts of high scale. The positive impact is high-magnitude, centered on providing secure, quality employment, fair wages, and promoting diversity. The core negative impact is the health and safety sub-topic, specifically related to the potential for mental health strain and burnout driven by the high-performance, fast-paced nature of the industry. This requires active mitigation (high remediation potential), making the topic material for reporting.

Financial materiality

Financial risks are driven by potential liabilities (e.g., non-compliance with working time regulations, workplace disputes) and expenses related to talent. The key financial opportunity is the ability of a strong, healthy workplace culture to act as a competitive advantage. This attraction and retention opportunity reduces employee turnover costs, secures critical skills, and ultimately safeguards future revenue generation by maintaining service quality.

ESRS S4

Consumers & End-Users**Impact materiality**

This is a material topic due to the potential for widespread negative impact across multiple sub-topics, specifically privacy and non-discrimination. As a digital marketing agency, our service delivery involves the sophisticated application of data-driven insights and targeting to facilitate relevant audience engagement. While these processes are essential for modern marketing effectiveness, they require rigorous ongoing stewardship to mitigate potential impacts on individual privacy, notwithstanding our well established compliance frameworks. Furthermore, the content and targeting of marketing campaigns carry an inherent ethical risk of psychological harm or discrimination (e.g., algorithmic bias), making the responsible marketing practices sub-topic material.

Financial materiality

The most significant financial risk is classified as a liability and carries a high materiality score. This risk is directly tied to potential regulatory fines (e.g., GDPR) and litigation costs arising from data privacy breaches or missteps in campaign targeting. The opportunity lies in developing new, privacy-first marketing solutions that anticipate not only evolving regulation but also the heightened privacy and transparency expectations of modern consumers, enabling the company to lead the market and generate new revenue.

ESRS G1

Business Conduct**Impact materiality**

The material impact is focused on the management of supplier relationships sub-topic, specifically concerning ethical standards and due diligence in the media and tech partner value chain. While direct impact from corporate culture is assessed as low, the potential for adverse impact through the supply chain or ethical lapses in client work is sufficient to meet the impact materiality threshold.

Financial materiality

This topic is highly material from a financial perspective. The primary risk is to liabilities and expenses stemming from non-compliance, legal costs, and fines (e.g., anti-corruption, antitrust, or data ethics). The opportunity is to gain a competitive advantage by embedding superior corporate culture and ethics, attracting clients who prioritise ethical supply chains and robust governance, thereby safeguarding and enhancing future revenue.

Entity-Specific Topic

Responsible AI**Impact materiality**

Material due to the negative impact posed by the increasing integration of generative and predictive AI into core services. This creates inherent ethical risks of propagating bias, generating misinformation, or enabling algorithmic manipulation in client advertising campaigns. The potential magnitude is high, as unethical AI use can cause serious harm to consumers and Precis' reputation. The negative impact is expected to decrease over the next three years, contingent on the continuous enhancement of our AI Ethics Framework.

Financial materiality

The financial risk is tied to liabilities and reputational damage. Irresponsible AI use could lead to substantial fines and damages under new or evolving legislation (e.g., EU AI Act) and severely affect client retention and acquisition. The clear opportunity is to position Precis as a thought leader in AI governance, creating new consulting and implementation services that enhance revenue and brand value.

Non-material topics

Topics that were assessed as non-material for both impact and financial perspectives are listed below. The core rationale for all environmental standards (E2-E5) is the company's fundamental business model: office-based and asset-light.

ESRS E2
Pollution

Low materiality (Impact & Financial)
Precis' direct operations (office-based) generate negligible pollution. While indirect pollution exists in the value chain (e.g., e-waste from disposed hardware), the risk is mitigated by

effective internal recycling programs and reliance on suppliers with strong environmental track records. The financial risk of a material pollution event is deemed low likelihood and low effect.

ESRS E3
Water & Marine Resources

Low materiality (Impact & Financial)
Direct water consumption is negligible. The only relevant impact is indirect, stemming from the water-intensive cooling of cloud providers' data centers. However, this impact is con-

sidered non-material because Precis' primary supplier selection process has prioritised providers (e.g. Google) with robust water stewardship programs, effectively mitigating the dependency risk and associated financial effects.

ESRS E4
Biodiversity & Ecosystems

Low materiality (Impact & Financial)
Precis' operations do not involve land use or physical infrastructure that could directly affect biodiversity. The indirect risk through the value chain (e.g., data center construction)

is assessed as minimal, as primary operations are in low-risk geographic regions with stringent environmental protections, meaning both impact and financial consequences are highly unlikely to be material.

ESRS E5
Resource Use & Circular Economy

Low materiality (Impact & Financial)
Precis' primary material use is limited to IT equipment and office supplies. The impact is managed through internal waste reduction efforts. The financial risk is low because critical

resource dependency is managed by the value chain (cloud providers), who have established, mature circular practices (e.g., component reuse), making the risk of supply chain disruption or cost increase non-material to the entity.

ESRS S2 & S3
Workers In The Value Chain & Affected Communities

Low materiality (Impact & Financial)
These topics are non-material because Precis' business predominantly works with a low-risk supply chain (primarily tech platforms, software, and services) and operates in low-risk regions. The

likelihood of a severe adverse impact on workers in the value chain or affected communities (e.g., through land use or water stress) is not considered systemic, nor was it prioritised as a material issue by key stakeholders.

PART 2:

Topical disclosures

General Disclosure Requirements (GDR) for Policies, Actions, Metrics & Targets (PAT)

This section of our sustainability statement, aligned with the Impact, risk, and opportunity management (IRO) section of ESRS 2: General Disclosures, details our approach for managing the material sustainability matters identified in our double materiality assessment.

We adhere to the standard ESRS management framework by disclosing our Policies, Actions, Metrics and Targets (PAT) for each material topic. This structure ensures users can understand how our strategy translates into concrete operational measures and measurable results, reflecting the connectivity between governance, strategy, and performance.

A brief descriptions of the different components →



GDR-P: GENERAL DISCLOSURE FOR

Policies

Our policies represent the foundational commitments and principles adopted by Precis to govern our conduct and manage our material sustainability impacts, risks, and opportunities (IROs).



GDR-A: GENERAL DISCLOSURE FOR

Actions

Actions describe the specific operational steps we have taken or plan to take to manage our material impacts, risks, and opportunities, and the resources allocated to them. This moves beyond commitment to tangible execution.



GDR-M: GENERAL DISCLOSURE FOR

Metrics

Metrics are the quantitative and qualitative indicators used for internal monitoring and external reporting on our performance against the PAT framework.



GDR-T: GENERAL DISCLOSURE FOR

Targets

Targets are the measurable, time-bound objectives we have established to track and evaluate the effectiveness of our actions and policies.

Policy communication and implementation channels

Unless otherwise specified under a topical standard, Precis utilises a standardised approach to communicate its sustainability-related policies to ensure consistent implementation and transparency:

- **Internal implementation:** All policies are available to employees and contractors through our centralised and internal knowledge management systems. New policies or important updates are communicated via internal company-wide briefings and mandatory induction or refresher training.
- **External communication:** For stakeholders with a direct interest in our conduct - including clients and investors - our main and externally relevant policies are published on our website.
- **Value chain engagement:** Policies relevant to our business partners and suppliers are integrated into our contractual agreements and supplier onboarding procedures to ensure alignment across our upstream and downstream value chain.

ESRS E1

Climate Change

This section outlines Precis's strategic approach to climate change mitigation in accordance with ESRS E1. As an asset-light company, our direct operational impact is minimal, resulting in zero Scope 1 emissions.

We are currently focused on establishing a comprehensive greenhouse gas (GHG) monitoring framework for our Scope 2 and Scope 3 emissions - with a specific emphasis on purchased energy, cloud infrastructure, and business travel. While our formal 1.5°C-aligned transition plan is slated for completion by 2027, we have already implemented group-wide policies, we are engaging with key tech suppliers, and we are prioritising renewable energy to actively reduce our carbon footprint today.

Transition plan for climate change mitigation

As of 31 December 2025, Precis has not yet adopted a formal transition plan for climate change mitigation.

Our current priority has been to establish a robust data collection framework to accurately measure our Greenhouse Gas (GHG) emissions across Scope 1, 2, and 3. Following our first double materiality assessment completed in 2025, we have identified "climate change mitigation" as a material topic and have begun the process of defining our long-term decarbonisation strategy.

We aim to adopt a comprehensive transition plan that aligns our business model and strategy with the objective of limiting global warming to 1.5°C in line with the Paris Agreement. We anticipate finalising and approving this plan by the end of 2027.

While a formal transition plan is under development, we are already taking steps to mitigate our climate impact, which will form the foundation of our future plan:

- **Measurement:** We have mapped our full Scope 1 and 2 emissions and significant categories of Scope 3 (specifically business travel).
- **Targets:** We are in the process of defining science-based targets for emission reductions.
- **Strategy:** We aim to actively engage with our primary cloud infrastructure providers to understand their decarbonisation roadmaps, as this represents one of our most significant indirect climate impacts.

While Precis is utilising the transitional provisions afforded by ESRS 1 to omit Scope 3 GHG emissions data for the 2025 period, we have identified that our long-term reliance on third-party digital infrastructure represents a 'locked-in' transition risk. Our strategy to mitigate this risk focuses on vendor engagement and technical optimisation, ensuring that as we begin full Scope 3 reporting in future periods, we have a plan to address the underlying structural dependencies.



Policies

GDR-P

Topic / Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives
<p>Climate change mitigation (Energy and GHG emissions)</p>	<p>Sustainability and Environmental Policy: Commits to the 1.5 °C pathway to safeguard access to investment and lower capital costs. Includes:</p> <p>Transition Strategy: Phasing out fossil fuels in offices and leased cars.</p> <p>Supplier Engagement: Screening and prioritising tech partners that have 100% renewable energy roadmaps by 2030 to mitigate passed-on carbon costs and Scope 3 impacts.</p> <p>Client Screening: Discontinuing collaboration with high-emitting clients to align the portfolio with a low-carbon economy.</p>	<p>Group-wide: Applies to all Precis own operations and business relationships (upstream/downstream).</p>	<p>GHG Protocol (for Scope 1, 2, and 3 monitoring);</p> <p>UN Global Compact principles on environmental responsibility.</p>
<p>Climate change mitigation (Operational travel)</p>	<p>Travel policy for cross-office teams: Mitigates financial expense risks and carbon footprint by:</p> <p>Virtual-First: Mandating online meetings over travel where possible.</p> <p>Efficiency Rules: Restricting cross-office meetups to 1-2 times yearly, utilising internal offices over external venues, and limiting stays to one night.</p> <p>Mode of Transport: Preferring low-carbon transportation options for necessary travel.</p>	<p>All employees, particularly cross-office functions.</p>	<p>Aligned with the Paris Agreement goals to limit global warming to 1.5 °C.</p>



Actions

GDR-A

Topic/Sub-topic	Description of key actions	Resources allocated / time horizon
Climate change mitigation (Energy & Scope 3)	Supplier initiative: Initiating a technical review of our cloud usage to optimise data storage and transfer efficiency. This directly addresses the risk of passed-on energy costs from providers like Google and Meta by reducing our underlying computational demand.	Resources: Tech engineering team Horizon: Medium-term (Ongoing to 2027).
Climate change mitigation (Operations)	Operational decarbonisation: Renegotiating office energy contracts to prioritise 100% renewable sources.	Resources: Finance and office operations budget. Horizon: Medium-term (Ongoing to 2027).



Metrics

GDR-M

Topic / sub-topic	Quantitative & qualitative metrics	Relevance to IROs
Climate change - Energy consumption & mix	Total energy consumption in MWh, (when possible) disaggregated by: (a) Fossil, (b) Renewable sources (including nuclear). Further disaggregation of fossil fuels (coal, oil, gas) is mandatory.	Mitigates impact: Tracks transition from fossil to renewable energy, directly addressing impact of GHG emissions from operations.
Climate change - Gross scopes 1 & 2 emissions	Absolute gross GHG emissions (tCO ₂ e) reported as: (a) Scope 1 (including % from ETS) and (b) Scope 2 (Location-based vs. Market-based).	Mitigates financial risk: Directly monitors the primary operational driver of "expense risk" linked to potential carbon pricing or fossil fuel taxes.
Climate change - Gross scope 3 emissions	Significant Scope 3 categories (tCO ₂ e), specifically Category 1: Cloud computing and data centers. Screening must be updated every three years.	Mitigates impact: Addresses the material Scope 3 impact identified as the value chain's high energy dependency.

Overview of climate metrics

Scope 1 emissions

Precis' business model is office-based and asset-light, focused on providing digital marketing and consultancy services. As a result, the company does not have any Scope 1 emissions.

This conclusion is based on the following operational parameters:

- Stationary combustion: Precis does not own or control any facilities with boilers, furnaces, or generators that utilise fossil fuels.
- Mobile combustion: The company does not own a corporate vehicle fleet; all business travel is conducted via third-party providers or employee-owned vehicles (accounted for in Scope 3).
- Fugitive emissions: There are no industrial processes or physical assets under our operational control that result in the direct release of greenhouse gases.

GHG emissions source type	Unit	2025
Gross Scope 1 GHG emissions	tCO ₂ e	0
- of which stationary combustion	tCO ₂ e	0
- of which mobile combustion	tCO ₂ e	0
- of which process emissions	tCO ₂ e	0
- of which fugitive emissions	tCO ₂ e	0
Biogenic tCO₂e emissions (reported separately)	tCO ₂ e	0
% of Scope 1 from regulated emission trading schemes	%	0%

Biogenic CO₂ emissions

Biogenic CO₂ emissions are calculated and reported separately from the GHG Scopes in accordance with ESRS E1-8 and the GHG Protocol Corporate Standard. For the 2025 period, no biogenic emissions were identified within the reporting boundary.

Scope 2 emissions

Purchased electricity

Description and Boundary

Covers all electricity purchased for Group offices and facilities during the reporting period (1 January – 31 December 2025). Data are based on utility invoices or landlord-provided consumption where metered; estimates are used only where direct data are unavailable.

1/2

Electricity consumption and emissions										
Subsidiary / Site	Country	Electricity Purchased (kWh)	Renewable Share (%)	Guarantees of Origin (Y/N or % Covered)	Emission Factor (t CO ₂ e/MWh)	Scope 2 (Location-based, t CO ₂ e)	Scope 2 (Market-based, t CO ₂ e)	Emission Factor Source	Data Quality (Actual/Est.)	Coverage (%)
Precis Digital AB – Linköping	Sweden	16890	100%	Y (100 %)	0.008	0.14	0	EEA (SE) / Supplier	Actual	100.00%
Precis Digital AB – Stockholm	Sweden	56514	100%	Y (100 %)	0.008	0.45	0	EEA (SE) / Supplier	Actual	100.00%
Precis Digital Mitt AB	Sweden	0	-	-	0.008	0	0	EEA (SE) / Supplier	Actual	100.00%
Precis Digital Syd AB	Sweden	29939	100%	Y (100 %)	0.008	0.24	0	EEA (SE) / Supplier	Actual	100.00%
Precis Partner AB	Sweden	0	-	-	0.008	0	0	EEA (SE) / Supplier	Actual	100.00%
Nucleus Agency AB	Sweden	0	-	-	0.008	0	0	EEA (SE) / Supplier	Actual	100.00%
Precis Digital AS	Norway	36166	100%	N	0.011	0.4	0	EEA (NO) / Supplier	Actual	100.00%
Precis Digital ApS – Copenhagen	Denmark	15750	100%	Y (100 %)	0.117	1.84	0	EEA (DK) / Supplier	Actual	100.00%

ESRS E1 - CLIMATE CHANGE

Subsidiary / Site	Country	Electricity Purchased (kWh)	Renewable Share (%)	Guarantees of Origin (Y/N or % Covered)	Emission Factor (t CO ₂ e/MWh)	Scope 2 (Location-based, t CO ₂ e)	Scope 2 (Market-based, t CO ₂ e)	Emission Factor Source	Data Quality (Actual/Est.)	Coverage (%)
Precis Digital ApS – Aarhus	Denmark	16607	100%	Y (100 %)	0.117	1.94	0	EEA (DK) / Supplier	Actual	100.00%
Precis Digital Oy	Finland	0	-	-	0.04	0	0	EEA (FI) / Supplier	Actual	100.00%
The F Company Oy	Finland	9560	100%	Y (100 %)	0.04	0.38	0	EEA (FI) / Supplier	Actual	100.00%
Precis Digital Ltd	United Kingdom	21,546	N/A	N	0.128	2.76	0	DEFRA (UK) / AIB Estimate	Estimate	100.00%
Katté & Co Ltd	United Kingdom	0	-	-	0.128	0	0	DEFRA (UK) / Supplier	Actual	100.00%
Precis SRL	Italy	12961	N/A	N	0.225	2.92	5.34	EEA (IT) / Supplier	Actual	100.00%
Precis Digital SL	Spain	4730	N/A	N	0.136	0.64	1.38	EEA (ES) / AIB Estimate	Actual	100.00%
Bannerboy AB	Sweden	0	-	-	0.008	0	-	EEA (SE)	Actual	100.00%
Bannerboy BV	Netherlands	0	-	-	0.263	0	-	EEA (NL)	Actual	100.00%
Bannerboy Ltd	United Kingdom	0	-	-	0.207	0	-	DEFRA (UK)	Actual	100.00%
Bannerboy Corporation	United States	2840	-	N	0.373	1.06	-	EPA (US)	Actual	100.00%
Group Total	—	223503	Weighted %	65.83%	—	12.77	6.72	—	—	100 %

Methodology

Emissions are calculated in accordance with the GHG Protocol and ESRS E1 §§ 41 – 47, using location-based grid averages (EEA for mainland Europe, DEFRA for the UK, and EPA for the US) and market-based approaches (supplier-specific emission factors, Guarantees of Origin, or AIB European Residual Mixes).

Notes

Minor estimation was applied (< 10% of total group footprint) for sites lacking direct meter data or specific supplier contracts; specifically, consumption and market-based fallback factors (AIB residual mix) were estimated for the UK (Precis Digital Ltd) and Spain (Precis Digital SL) offices due to landlord-controlled utilities. No on-site generation occurred. Overall data quality is assessed as high, with the vast majority of the boundary supported by actual invoice documentation.

Purchased heating

Description and Boundary

Includes district or building-supplied heating used in Group offices. Data from landlords or heating providers for each subsidiary.

Heating consumption and emissions by subsidiary & location

Subsidiary / Site	Country	Heating Purchased (kWh)	Emission Factor (t CO ₂ e/MWh)	Scope 2 Emissions (t CO ₂ e)	Emission Factor Source	Data Quality (Actual/Est.)
Precis Digital AB – Linköping	Sweden	28 248	0.14	3.81	Supplier	Actual
Precis Digital AB – Stockholm	Sweden	214 393	0.05	10.93	Supplier	Actual
Precis Digital Mitt AB	Sweden	-	0	0	-	N/A
Precis Digital Syd AB	Sweden	77 311	0.05	3.71	Supplier	Actual
Precis Partner AB	Sweden	-	0	0	-	N/A
Nucleus Agency AB	Sweden	-	0	0	-	N/A
Precis Digital AS – Oslo	Norway	46 885	0.1	4.59	Supplier	Actual
Precis Digital ApS – Copenhagen	Denmark	38 500	0.04	1.54	Supplier	Actual
Precis Digital ApS – Aarhus	Denmark	31 126	0.02	0.59	Supplier	Actual
Precis Digital Oy	Finland	-	0	0	-	N/A
The F Company Oy – Helsinki	Finland	36 034	0.14	4.94	Supplier	Actual
Precis Digital Ltd – London	United Kingdom	-	0	0	-	N/A
Katté & Co Ltd	United Kingdom	-	0	0	-	N/A
Boosterbox SRL	Italy	-	0	0	-	N/A
Precis Digital SL	Spain	-	0	0	-	N/A
Bannerboy AB	Sweden	-	0	0	-	N/A
Bannerboy BV	Netherlands	-	0	0	-	N/A
Bannerboy Ltd	United Kingdom	-	0	0	-	N/A
Bannerboy Corporation – New York	United States	2 840	0.2	0.57	-	Actual
Group Total	—	475 337	—	30.69	—	—

Methodology

Emissions are calculated in accordance with the GHG Protocol and ESRS E1-6 (a)(ii). To ensure the highest level of accuracy, Scope 2 purchased heating emissions for the Nordic region (Sweden, Norway, Denmark, Finland) were calculated using supplier-specific district heating emission factors sourced directly from the local municipal utility providers' annual environmental declarations (e.g., Stockholm Exergi, Tekniska Verken, Göteborg Energi, Hafslund Oslo Celsio, HOFOR, Kredsløb, and Helen Oy). For locations where heating is fully electrified (such as the United Kingdom, Italy, and Spain), the associated emissions are inherently captured within the Scope 2 location- and market-based electricity calculations.

For leased facilities lacking direct sub-metering, energy consumption was estimated using a floor-area apportionment approach; the site's usage was calculated by taking the landlord's total building consumption and allocating a pro-rata share based on the subsidiary's leased square meterage relative to the total building area. Where specific purchased heating/steam data was unavailable (the United States), recognised national agency fallback factors (such as the EPA) were applied.

Note: Data is fully consolidated at the subsidiary level. The transition from national grid averages to highly localised, supplier-specific utility factors for district heating represents a high standard of data quality and accuracy for Scope 2 reporting. As noted in the methodology, heating for the offices in the United Kingdom (London), Italy, and Spain is fully electrified (e.g., via heat pumps or electric VRF systems); therefore, the energy consumption and associated emissions for heating at these locations are already fully captured within their Scope 2 purchased electricity totals.

Purchased cooling

Cooling systems are utilised exclusively at the subsidiary offices located in Italy, Spain, and the United States. Because these locations rely on fully electrified cooling methods (e.g., standard electric air conditioning units or electric chillers), all associated energy consumption and emissions are already fully captured within their respective Scope 2 purchased electricity totals. Consequently, no separate Scope 2 purchased cooling (e.g., district cooling) emissions are reported in this section.

Scope 3 emissions

Purchased goods and services

Scope 3 category 1 covers indirect GHG emissions from goods and services purchased by Precis Group that are not included in scopes 1 or 2. A quantitative and qualitative screening of 2024 procurement data identified the supplier categories materially contributing to the Group's carbon footprint.

The assessment applied criteria for emission intensity, strategic relevance to service delivery, and mitigation potential.

Identified material categories:

- Cloud computing and data-hosting services (AWS, Google Cloud Platform, Azure)
- SaaS and digital platforms used in campaign delivery, analytics, and creative production
- IT hardware and peripherals (laptops, monitors, network equipment)

Exclusion due to transitional relief:

While the categories above have been identified as material to the Group's operations, they are excluded from the current disclosure in accordance with the transitional provisions of ESRS 1. As permitted for the first year(s) of reporting, the Group has elected to omit this data to allow for the implementation of robust primary data collection and to ensure the accuracy of value chain calculations

Immaterial exclusions:

All other supplier categories - including banking, insurance, professional and legal services, facilities management, and office consumables - were evaluated as immaterial (< 1% of estimated total Scope 3 emissions). Their exclusion is based on materiality thresholds and is not expected to affect the completeness of the eventual footprint.

This boundary and the use of transitional provisions will be reviewed annually in line with ESRS 1 § 70 to ensure continued relevance as the reporting maturity evolves.



Targets

GDR-T

Topic / sub-topic	Measurable, time-bound targets	Strategic objective
Climate change - GHG emissions reduction (Scope 2)	Reduce absolute Scope 2 GHG emissions by 21% by 2030 from a 2025 baseline (in line with SBTi 1.5°C pathway).	Achieve near-zero operational footprint through electrification and renewable energy sourcing. Based on the 4.2% linear annual reduction mandated by the Science Based Targets initiative (SBTi) for a 1.5°C pathway.
Climate change - Renewable energy	Maintain 100% renewable electricity sourcing across all global offices through 2030, verified by Guarantees of Origin (GoOs).	Decouple digital growth from energy-related carbon impacts.
Climate change - Scope 3 (value chain)	Reduce Scope 3 GHG emissions intensity (per FTE) by 50% by 2030 from a 2025 baseline, covering at least 67% of material categories.	Mitigate the primary climate impact originating from cloud providers and business travel.
Climate change - Net zero	Achieve Net Zero GHG emissions across the full value chain by 2050, with an interim target of 90% gross reduction by 2045.	Long-term alignment with the Paris Agreement and EU Climate Law.
Climate change - Climate neutrality (offsets)	Neutralise 100% of residual emissions annually starting in 2030 using only high-quality carbon removals (ICVCM-aligned).	Provide immediate climate accountability while working toward deep gross reductions.

** Precis focuses on gross emission reductions as the primary lever for climate mitigation. Carbon credits are utilised as a supplemental tool for beyond-value-chain mitigation and do not count toward our gross reduction targets.*

EU taxonomy disclosures

As a digital marketing and technology services company, the primary business activities of Precis Group (NACE Code M73) do not currently fall under the scope of the "eligible economic activities" listed in the EU Taxonomy Climate Delegated Act. Our revenue is derived primarily from digital strategy and marketing services that are not yet covered by the Taxonomy's strict definitions for climate contribution.

Consequently, for the financial year 2025, we report the following:

- Taxonomy-eligible Turnover: 0%
- Taxonomy-aligned Turnover: 0%
- Taxonomy-eligible CapEx: 0% (capital expenditure related to non-eligible activities)
- Taxonomy-eligible OpEx: 0% (operating expenditure related to non-eligible activities)

Note: While our core revenue-generating activities are not currently eligible, we continue to monitor updates to the Environmental Delegated Act to assess future eligibility.

KPI	Total (mSEK)	Proportion of taxonomy-aligned activities (%)	Proportion of taxonomy-eligible but not aligned activities (%)	Proportion of taxonomy-non-eligible activities (%)
Turnover	1 175	0%	0%	100%
CapEx	7	0%	0%	100%
OpEx	1 121	0%	0%	100%

ESRS S1

Own Workforce

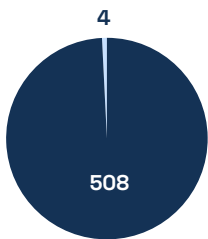
At Precis, our success starts and ends with our people, and their commitment, engagement and development. This section of our report, guided by the ESRS S1 standard, is our way of being transparent about, and holding us accountable for, how we treat, support, and grow our workforce.

We focus our efforts on ensuring fair working conditions, fostering an engaging culture of equal opportunity, respecting fundamental labor rights, and prioritising the holistic well-being of every person on our team.

Characteristics of the workforce

Note: The majority of the Group's work is performed by employees; reliance on non-employee workers is not significant (9 contractors eqv. to 1.7% of workforce).

Total employees by contract type



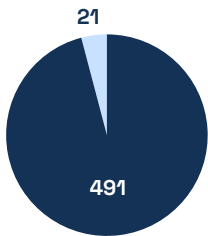
• Permanent • Temporary

Total employees by contract type (Gender breakdown)

Category	Total (headcount)	Male	Female	Other / Not disclosed
Permanent employees	508	248	259	1
Temporary employees	4	3	1	0
Non-guaranteed hours	N/A	N/A	N/A	N/A
Total employees	512	251	260	1

*Requirement: Breakdown of permanent vs. temporary employees by gender.

Total employees by employment type



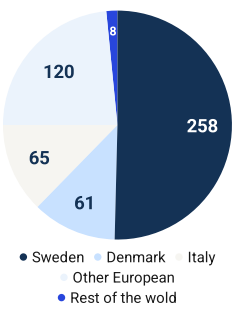
• Full-time • Part-time

Total employees by employment type (Gender breakdown)

Category	Total (headcount)	Male	Female	Other / Not disclosed
Full-time employees	491	242	248	1
Part-time employees	21	9	12	0
Total employees	512	251	260	1

*Requirement: Breakdown of full-time vs. part-time employees by gender.

Employees by region



Employees by region (Top countries)	
Region / Country	Total employees (headcount)
Sweden (headquarter)	258
Denmark	61
Italy	65
Other European (Norway, Finland, Netherlands, Spain, UK)	120
Rest of world (US)	8
Total	512

*Requirement: Breakdown by country for countries with 50+ employees or representing at least 10% of total workforce.

Methodology

The data above represents the total headcount of employees as of 31 December 2025. It includes all employees with a direct employment contract with Precis Group or its subsidiaries.

Headcount definition: We report based on the number of individual persons employed (including employees on parental leave or garden leave, excluding contractors), regardless of their working hours (512).

Note: 'Permanent' refers to contracts with no fixed end date. 'Temporary' refers to fixed-term contracts (e.g., maternity cover, internships). 'Full-time' and 'part-time' are defined according to national laws in each operating country.



Policies

GDR-P

These policies apply to the Precis Digital Group (all entities). Implementation is managed locally by designated People Partners to ensure compliance with national labor laws in operating countries.

1/2

Topic / Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives	Consideration of affected stakeholders
Occupational health and safety and Working conditions	Work environment policy: Prevents ill health and accidents. Focuses on physical, organisational, and social work environments. Includes commitments to zero tolerance for harassment/violence and the integration of these issues into everyday business planning.	Applies to all internal employees, the entire Precis company group, and 100% of non-employee workers operating on Precis sites (contractors).	Aligned with ILO Conventions No. 155 and 187 regarding fundamental safety rights. Incorporates the 'Vision Zero' principles from the EU Strategic Framework on Health and Safety 2021-2027.	Employees are provided with opportunities for influence and co-operation, and are engaged through a continuous feedback loop and a social dialogue and participation framework: results from tri-annual measurements are shared transparently, followed by structured dialogues between employees and management to co-create and monitor improvement actions. Policy ensures reporting mechanisms are accessible and confidential via designated HR representatives for different regions/groups.

Topic / Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives	Consideration of affected stakeholders
<p>Diversity and equal treatment</p> <p>(including gender equality, equal pay, and measures against violence and harassment).</p>	<p>Anti-Discrimination, Harassment & Bullying Policy:</p> <p>Establishes a zero-tolerance stance on discrimination, harassment, and bullying. It mandates shared responsibility where co-workers are expected to “stand up for each other” and report misconduct. Includes a structured investigation process with guaranteed non-retaliation and support for those involved.</p>	<p>Applies to all internal employees, the entire Precis company group, and 100% of non-employee workers operating on Precis sites (contractors).</p> <p>Coverage extends to interactions with external parties and clients.</p>	<p>Aligned with national anti-discrimination laws in operating countries.</p> <p>Utilises the Visslan tool for encrypted, anonymous reporting</p>	<p>Workers are consulted via HR representatives to ensure channels are safe and culturally appropriate.</p> <p>Stakeholders are offered additional support (e.g., counseling, time off) during investigations.</p>
<p>Fair remuneration</p> <p>(Adequate wages and equal pay).</p>	<p>Salary guidelines/policy: Salaries are individual, performance-based, and benchmarked to be attractive and competitive. Uses transparent salary bands (updated Feb 2025) accessible to all staff. Commits to equal pay practices by reviewing gender and other demographics during the annual April salary review.</p>	<p>Applies to all internal employees, the entire Precis company group, and 100% of non-employee workers operating on Precis sites (contractors). Salaries are adjusted to local market standards for each operating country.</p>	<p>Aligned with local market dynamics and national wage standards. Targets a max 5% adjusted pay gap between genders.</p>	<p>Employees can initiate their own salary reviews if they believe their pay does not match their performance. Salary bands are reviewed annually based on internal data and external benchmarking.</p>
<p>Other work-related rights</p> <p>Grievance mechanisms and channels for raising concern.</p>	<p>Whistleblowing policy:</p> <p>Protection against retaliation; anonymous reporting channels; 7 days initial response time; independent investigation protocols.</p>	<p>Applies to all internal employees, the entire Precis company group, and 100% of non-employee workers operating on Precis sites (contractors)..</p>	<p>Aligned with EU Directive 2019/1937 and national transposition laws in each operating country.</p>	<p>Consulted with legal and HR representatives to ensure the reporting channels are safe and culturally appropriate for different regions.</p>



Actions

GDR-A

Topic/Sub-topic	Description of key actions	Resources allocated / time horizon
Health & safety / working conditions Working conditions Work environment	<p>Continuous work environment improvement dialogues and initiatives.</p> <p>Using tertrial survey data (eNPS & engagement survey) to implement targeted interventions (e.g., ergonomic upgrades, mental health workshops, or workload adjustments) and to identify teams with high “pressure” scores. Analysis are made both at company-wide Group-level, and distributed down to each market (business unit) and department/solution group), with actions adapted to fit each context.</p> <p>HR and leads must analyse results and co-create a mitigation plan within 30 days for any team scoring low or sub target thresholds.</p>	<p>Resource: HR and MGMT teams & survey tool in HRIS HiBob.</p> <p>Recurring, three times per year.</p>
Workforce health & safety Employee wellbeing	<p>Tiered employee>manager dialogue framework:</p> <ol style="list-style-type: none"> 1) Standard agenda points in recurring monthly 1:1s to monitor immediate workload and health. 2) A mandatory mid-year in-depth 1:1, as a “psychosocial risk mitigation” tool focused on long-term psychosocial health, career sustainability, and alignment with work-life goals. 	<p>Led by direct managers, with HR oversight via HRIS HiBob.</p> <p>Ongoing & semi-annual.</p>
Equal pay / diversity & inclusion Annual Equal Pay Audit & Alignment	<p>A systematic review conducted every April as part of the salary review cycle. We perform a gender pay gap analysis (adjusted pay gap) to identify discrepancies. Any gaps exceeding 5% that are not justified by objective criteria (e.g., role level, years of experience, or performance rating) are corrected during the calibration phase before final salary increases are approved.</p>	<p>Resources: HR team & MGMT and direct managers.</p> <p>Recurring, yearly.</p>
Other work-related rights Grievance mechanisms and channels for raising concerns	<p>Whistleblowing mechanism reporting integrity check</p> <p>Annual testing of anonymous channels to ensure technical separation and confidentiality</p>	<p>Recurring, yearly.</p>
Commitment to freedom of association	<p>Precis maintains a neutral stance toward unionisation. We facilitate an open-door policy where employees are free to join or form trade unions without fear of retaliation, regardless of whether a formal CBA is in place in that jurisdiction.</p>	



Metrics

GDR-M

Topic/sub-topic	Quantitative and qualitative metrics	Relevance to IROs
Working conditions Secure employment	FTEs vs part-time, % of employee population Permanent employees vs temporary, % of employee population. Contractor/freelance count in % of employee population.	High rates of permanent and FTE status demonstrate a positive impact on worker socio-economic stability and mental well-being. Low reliance on temporary or freelance staff minimises operational disruption from turnover and legal risks regarding worker misclassification. High job security strengthens employer branding and long-term talent retention.
Working conditions Adequate wages	Measured by compliance to our salary bands, which are benchmarked annually in every geographic location.	Mitigates compliance & reputational risk: Directly addresses equal pay requirements and the risk of systemic bias in compensation.
Working conditions Freedom of association & CBA coverage	Percentage of total employees covered by collective bargaining agreements (CBAs).	Mitigates social risk: Ensures fundamental labor rights are respected across all jurisdictions, providing a safety net for workers' rights and stable labor relations.
Working conditions Health and safety Sickness absence	Calculated by Days lost / total working days)	Mitigates operational risk: Directly tracks risks related to burnout and high-performance pressure. Aligns with the 2.5% industry benchmark for professional services.
Working conditions Work environment	Count of accidents (non-fatal). Responses in tri-annual survey (eNPS) question: <i>My office space contributes to creating a good work environment for me.</i>	Maintaining a zero-accident count demonstrates a positive impact on physical health and safety.
Workforce Health & Safety Employee wellbeing, Worklife balance	Measured in tertrial survey (eNPS) questions below: - <i>I feel able and supported to look after my well-being and mental health at work:</i> - <i>If my workload becomes overwhelming, I feel supported by my manager and peers in finding solutions:</i> - <i>My workload is generally manageable and sustainable:</i> - <i>≥85% agree (Yes/No) to tertrial survey (eNPS) question I am satisfied with how my work arrangements provide the flexibility I need to maintain a healthy balance in life.</i>	Employee wellbeing functions as a vital sign for an organisation's social health. It is a formal metric for operational resilience and long-term value creation. Similarly, work-life balance acts as a strategic risk-management tool. By prioritising flexibility and mental health, we directly mitigate the "Social Risks" of burnout, absenteeism, and high turnover.

Topic/sub-topic	Quantitative and qualitative metrics	Relevance to IROs
<p>Diversity and equal treatment</p> <p>Discrimination & Harassment</p>	<p>Measured by the number of cases reported in whistleblower tool Visslan, or by HR case investigation.</p> <p>Score (Likert scale 1-5) on tertrial eNPS question I experience that everyone working at Precis is treated in a fair, equal, and respectful way.</p> <p>≥4.5 inclusion index score.</p>	<p>This topic is fundamental to IRO because it monitors the undertaking's impact on human rights - specifically through the prevention of bias and harassment - while mitigating material financial risks like legal liability and talent attrition. Proactively fostering inclusion secures enterprise value by reducing reputational damage and driving operational innovation.</p>
<p>Training and skills development</p>	<p>Learning targets are measured in employee training participation in the HRIS/HiBob Learning module.</p> <p>- 100% of new hires complete 'core onboarding' courses within 3 months.</p> <p>Average of 20+ hours of structured training per employee per year.</p> <p>Note: majority of learning efforts occur in more unstructured, non-measurable peer auditing/mentorship/workshops/etc learning formats.</p> <p>Promotion rate is measured in yearly D&I report data, annually in April.</p>	<p>Measure our organisation's impact on worker employability and career progression while mitigating the financial risk of a skills gap during industry transitions. Proactive upskilling transforms potential labor obsolescence into a competitive opportunity, driving long-term operational resilience and innovation.</p>
<p>Employee Engagement & Retention</p>	<p>Attrition rate measured in HiBob People Analytics Dashboard.</p> <p>eNPS (advocacy and employee satisfaction) measured tertrial eNPS & engagement surveys in HiBob.</p>	<p>Fundamental because it measures the undertaking's impact on worker satisfaction and motivation, which are direct indicators of a healthy company culture. From a risk perspective, high turnover represents a material financial risk due to the loss of institutional knowledge and high replacement costs. Conversely, strong engagement creates an opportunity to enhance productivity and long-term enterprise value through a stable, loyal workforce.</p>

Activity Metric	2025 data
Working conditions Secure employment	
FTEs vs part-time, % of employee population.	96%
Permanent employees vs temporary, % of employee population.	99.20%
Contractor/freelance count in % of employee population.	1.70%
Working conditions Adequate wages	
Compliance to our salary bands	100%
Working conditions Freedom of association & CBA coverage	
Percentage of total employees covered by collective bargaining agreements (CBAs).	15%
Working conditions Health and safety Sickness absence	
Days lost / total working days)	1.45%
Working conditions Work environment	
Count of accidents (non-fatal).	0
Responses in tri-annual survey (eNPS) question: My office space contributes to creating a good work environment for me (1 Strongly Disagree-5 Strongly Agree)	3.92

Activity Metric	2025 data
Workforce health & safety Employee wellbeing Worklife balance	
Measured in tertrial survey (eNPS) questions below:	
I feel able and supported to look after my well-being and mental health at work (1 Strongly Disagree-5 Strongly Agree)	4.03
If my workload becomes overwhelming, I feel supported by my manager and peers in finding solutions (1 Strongly Disagree-5 Strongly Agree)	4.04
My workload is generally manageable and sustainable (1 Strongly Disagree-5 Strongly Agree)	3.71
I am satisfied with how my work arrangements provide the flexibility I need to maintain a healthy balance in life. (Y/N)	95%
Diversity and equal treatment Discrimination & harassment	
Measured by the number of cases reported in whistleblower tool Visslan, or by HR case investigation.	1
Score (Likert scale 1-5) on tertrial eNPS question I experience that everyone working at Precis is treated in a fair, equal, and respectful way (1 Strongly Disagree-5 Strongly Agree)	4.13
≥4.5 inclusion index score in annual D&I survey	4.5
Gender balance	51 F/49 M
Training and skills development	
100% of new hires complete 'core onboarding' courses within 3 months.	50%
Average of 20+ hours of structured training per employee per year	N/A
Promotion rate, equal distribution of promoted females vs. males	18% F / 17% M
Employee engagement & retention	
Attrition (voluntary turnover)	12.90%
eNPS (advocacy and employee satisfaction)	27



Targets

GDR-T

Topic/Sub-topic	Measurable, time-bound targets	Strategic objective
Working conditions Secure employment	Maintain a permanent employee ratio of >85% to ensure organisational stability and continuity.	To ensure fair, transparent, and secure employment conditions that respect fundamental labour rights and adapt to local market standards. An increase in reports is viewed as a positive indicator of increased trust in our reporting mechanism, not necessarily an increase in misconduct.
Working conditions Health and safety Sickness absence	Maintain sickness absence rate below 2.5% annually across the Group. If the Group rate exceeds 3.0% for two consecutive trimesters, a psychosocial risk audit will be triggered in the affected region.	To ensure workforce wellbeing and health, by proactive health management, psychosocial risk mitigation and operational resilience..
Working conditions Adequate wages	100% of employees (including interns) are paid above the applicable living wage or collective agreement minimums.	To ensure adequate wages, economic security, fair remuneration and a competitive advantage on the job market.
Working conditions Freedom of association & CBA coverage	Ensure 100% of employees, regardless of CBA status, have access to social protection benefits (pension, health, and leave) that meet or exceed local industry standards.	To ensure that the 85% of employees not covered by a CBA are not at a disadvantage regarding their fundamental social and labor rights.
Working conditions Work Environment	Zero fatalities and aim for 0 recordable work-related injuries. >4/5 score in tri-annual survey (eNPS) question: <i>My office space contributes to creating a good work environment for me.</i>	To maintain a 'Zero Harm' environment that prioritises the physical and mental well-being of our employees.
Workforce health & safety Employee wellbeing, Work-life balance	≥4 score (Likert scale 1-5) on wellbeing and workload-related survey questions. ≥85% agree (Yes/No) to tertrial survey (eNPS) question <i>I am satisfied with how my work arrangements provide the flexibility I need to maintain a healthy balance in life.</i> Baseline: the survey questions on wellbeing have existing data since April 2025.	To promote employee retention by supporting wellbeing, flexibility, sustainable workloads & work-life balance.

Topic/Sub-topic	Measurable, time-bound targets	Strategic objective
<p>Diversity and equal treatment</p> <p>Discrimination & harassment</p>	<p>≥4 score (Likert scale 1-5) on tertrial eNPS question <i>"I experience that everyone working at Precis is treated in a fair, equal, and respectful way"</i>.</p> <p>0 substantiated incidents of discrimination or harassment.</p>	<p>Diversity & equal treatment</p> <p>To foster an inclusive & fair workplace that attracts talent and advances its people - regardless of their background, experiences or perspectives.</p>
<p>Diversity and equal treatment</p> <p>Diversity & Inclusion (D&I) committments</p> <p>Fair compensation</p>	<p>We apply our established D&I metrics, summarised yearly at start of T2 (April, post salary review):</p> <p>Targets: 60/40 gender balance, either direction. Measured at both role level, partner group and board.</p> <p>≥4.5 inclusion index score</p> <p>Ethnic/racial minority distribution for total Precis and on office level, should reflect local population. Harmonise spread within different levels, areas and leadership roles, for minority vs. non-minority segments as well as national belonging. Note: the target is based on anonymous self-identification surveys only.</p> <p>Measurement: yearly D&I report in April.</p> <p>Baseline: D&I goals in place since establishment of D&I strategy in 2021.</p> <p>Target: Max 5% adjusted pay gap, either direction between genders. Measured in yearly pay gap analysis in annual D&I report in April.</p>	<p>Diversity & equal treatment</p> <p>To foster an inclusive & fair workplace that attracts talent and advances its people - regardless of their background, experiences or perspectives.</p> <p>D&I focus areas:</p> <ol style="list-style-type: none"> 1. A diverse workforce: We strive for a diverse workforce that reflects the talent pool in the markets we serve. 2. Diversity in leadership: We foster diverse representation and perspectives at leadership levels to drive creativity, innovation, and effective problem-solving. 3. Enabling all individuals: We foster an inclusive culture where differences are embraced while ensuring equality and equity in all opportunities. <p>To provide fair, equitable, and competitive remuneration irrespective of gender or background.</p>
<p>Training and skills development</p>	<p>100% of new hires complete 'core onboarding' courses within 3 months.</p> <p>Average of 20+ hours of training per employee per year .Note: majority of learning efforts occur in more unstructured, non-measurable peer auditing/ mentorship/workshops/etc learning formats.</p> <p>100% of employees complete an annual performance review.</p> <p>100% of new managers complete 'New Leader' training within 6 months.</p> <p>100% of employees complete annual training on GDPR, Privacy and Data Ethics.</p> <p>Promotion rate Target: Gender balance in promotions to align with the overarching D&I goal (60/40), relative to the eligible pool.</p>	<p>To enable continuous professional growth and upskilling, ensuring our workforce remains competitive and engaged.</p>
<p>Employee engagement and retention</p>	<p>Attrition rate (voluntary turnover) Target: <15%</p> <p>eNPS Target: 55 at company level</p> <p>Baseline: the eNPS in its current format have existing data since April 2025.</p>	<p>To be an "employer of choice" by driving high engagement and minimising unwanted attrition.</p>

ESRS S4

Consumers & end-users

This section outlines Precis's strategic approach to managing impacts on consumers and end-users in accordance with ESRS S4.

As a digital marketing and consultancy firm, our primary social impacts are downstream and centered on the ethical handling of data and the societal influence of the advertising content we manage.

We are committed to safeguarding individual privacy and preventing non-discrimination in audience targeting, particularly as we integrate more advanced algorithmic and AI-driven solutions. While our business model does not involve physical products, we recognise our responsibility in the digital ecosystem to promote responsible marketing practices.



Policies

GDR-P

1/5

Topic/Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives	Consideration of affected stakeholders
<p>Data privacy</p>	<p>Data protection & privacy framework</p> <p>Please see the specific sub-section "Data protection & regulatory compliance framework" under ESRS G1: Business Conduct - Policies GDR-P, pages 72-74.</p>	<p>Please see the specific sub-section "Data protection & regulatory compliance framework" under ESRS G1: Business Conduct - Policies GDR-P, pages 72-74.</p>	<p>Please see the specific sub-section "Data protection & regulatory compliance framework" under ESRS G1: Business Conduct - Policies GDR-P, pages 72-74.</p>	<p>In setting this policy framework, the interests of the affected stakeholders (consumers/end-users, referred to as "data subjects") are central to the governance structure. The framework explicitly recognises that the purpose of the regulation is to protect the data subject's fundamental rights.</p> <p>Consideration for these stakeholders is operationalised through various mandatory policies and procedures, such as:</p> <p>Legal basis & principles: A mandate that all processing must be lawful, fair, and transparent, collected only for specified, explicit, and legitimate purposes.</p> <p>Processor constraints: When acting as a processor for clients, the policy and applicable data processing agreements strictly prohibits processing personal data without documented instructions from the client. It establishes a "stop-work" mechanism requiring employees to notify clients and pause work if an instruction infringes on data protection laws.</p> <p>Data subject rights: The framework establishes a formal mechanism for Data Subjects to exercise their rights, including the right to access, rectification, erasure, and objection to direct marketing.</p> <p>Security & resilience: Implementation of Technical and Organisational Measures (TOMs)</p> <p>Incident Notification: Processes for handling personal data breaches and security incidents, including notification protocols.</p> <p>Impact assessments: For processing activities likely to result in a high risk to data subjects, a Data Protection Impact Assessment (DPIA) is required prior to processing to evaluate and mitigate risks to the stakeholders.</p>

Topic/Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives	Consideration of affected stakeholders
<p>Ethical content & non-discrimination</p>	<p>Anti-discrimination & ethical business framework</p> <p>(Comprising various policies and steering documents, such as <i>Anti-Discrimination, Harassment & Bullying Policy, Supplier Code of Conduct, Employee Code of Conduct and Marketing Code of Conduct, see also policies under entity-specific topic: Responsible AI</i>)</p> <p>The primary objective of this policy framework is to ensure a culture and business practice entirely free from discrimination. While the organisation is developing specific operational guidelines for creative diversity and algorithmic bias, the existing framework addresses the material risk of discrimination through high-level ethical mandates.</p> <p>Key contents include:</p> <p>Zero tolerance for discrimination: The framework establishes a strict zero-tolerance stance against discrimination based on race, ethnicity, gender, sexual orientation, or other protected characteristics. While primarily framed around internal conduct, this sets the ethical baseline for all professional output, including marketing campaigns.</p> <p>Ethical use of AI: The Supplier Code of Conduct explicitly requires that partners providing AI-driven tools (e.g., advertising platforms) must commit to principles of "transparency, fairness, accountability, and non-discrimination in their AI development and deployment". This directly addresses the upstream risk of algorithmic bias. See also policies under entity-specific topic: Responsible AI.</p> <p>Values-based operation: The framework explicitly states that the company values diversity and inclusion, believing that a diverse workforce positively affects the company's results. This objective serves to mitigate the risk of homogenous teams producing biased content.</p>	<p>Own operations: The Anti-Discrimination Policy and Employee Code of Conduct as well as Marketing Code of Conduct apply to all employees, interns, and management within the Precis company group globally. This covers the teams responsible for strategy and creative production.</p> <p>Value chain (upstream): The Supplier Code of Conduct applies to all suppliers and partners, specifically including those providing technology and AI services. It requires them to respect international agreements on human rights and exercise due diligence to identify and mitigate adverse human rights impacts</p>	<p>The policy framework commits to complying with:</p> <p>International human rights agreements: The Supplier Code of Conduct explicitly references respect for international agreements on human rights.</p> <p>National anti-discrimination legislation: The framework cites compliance with local laws in operating countries (e.g., Sweden, UK, US) regarding protected characteristics.</p> <p>Fair competition & business laws: The framework mandates compliance with applicable antitrust and fair competition laws, which supports ethical market behavior.</p>	<p>In setting these policies, Precis prioritizes the creation of an inclusive environment for its workforce as a proxy for ensuring ethical external output. The policy acknowledges that "our foremost way of being a part of changing [prejudice and discrimination] is our actions as a company".</p> <p>For consumers and end-users, the framework considers their interest by mandating that suppliers (platforms) prevent discrimination in AI deployment. We recognise that the lack of specific creative diversity controls is a risk to these stakeholders and have committed to implementing specific "diversity guidelines" for the creative team to directly address stakeholder representation in advertising content.</p>

Topic/Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives	Consideration of affected stakeholders
<p>Access to quality information</p>	<p>Ethical business conduct & compliance framework (Comprising a broad variety of policies and processes, ranging from documents such as our Supplier Code of Conduct and Employee Code of Conduct to our data protection policies, see also policies under entity-specific topic: Responsible AI)</p> <p>The general objective of this policy framework is to ensure that all business activities are conducted with the highest standards of integrity, honesty, and openness. While the company does not currently maintain a standalone policy for universal content verification, the framework addresses the risk of misleading information through strict mandates on legal compliance and ethical behavior.</p> <p>Compliance with laws: A strict requirement that all operations and partners must comply with all applicable national and international laws. In the context of advertising, this inherently includes consumer protection laws prohibiting false or misleading advertising</p> <p>Professional judgment: Employees are expected to use "common sense and professional judgment" at all times, which acts as a safeguard against facilitating obviously harmful or fraudulent content.</p> <p>Client responsibility: The policy framework delineates responsibility, stipulating that clients retain ownership of their marketing platform accounts and are responsible for accepting the relevant Terms & Conditions. This ensures that the primary obligation for content accuracy and adherence to platform policies (e.g., Google, Meta) remains with the content originator (the client).</p>	<p>Own operations: The Employee Code of Conduct applies to all employees, interns, and consultants working at Precis, ensuring a baseline of professional judgment is applied to all client work</p> <p>Value chain (upstream & downstream): The Supplier Code of Conduct applies to all suppliers, vendors, partners, and contractors. It mandates that business be conducted in a way that builds trust, respect, and credibility with all stakeholders.</p>	<p>National and international law: A blanket commitment to legal compliance in all jurisdictions of operation, which encompasses local advertising standards and consumer protection regulations.</p> <p>Platform policies: By enforcing that clients own their accounts and accept Terms & Conditions, the undertaking indirectly commits to the advertising standards and content policies set by major third-party platforms (e.g., Google Ads Policy, Meta Advertising Standards), which prohibit misrepresentation and low-quality content.</p>	<p>In setting this framework, Precis prioritises the trust and credibility of the company and its stakeholders. The Employee Code of Conduct emphasises that employees must avoid conduct that would damage the company's reputation, acknowledging that facilitating misleading information creates reputational risk.</p> <p>The framework recognises that while the client is the primary controller of content, our adherence to ethical standards serves to protect end-users from illegal or harmful commercial practices.</p>

Topic/Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives	Consideration of affected stakeholders
<p>Health and safety</p>	<p>Responsible client portfolio & sustainability framework (Comprising: Sustainability Policy and Supplier Code of Conduct)</p> <p>The primary objective of this policy framework is to ensure that the company's core business - helping clients grow - does not contribute to societal harm or negative health impacts on consumers.</p> <p>Key contents include:</p> <p>Exclusion of harmful products (Controversial Industries): To minimise direct harm to end-users, the Sustainability Policy explicitly restricts collaboration with actors in sectors deemed "controversial" or harmful to society. These categories are defined as: Gambling, Politics, Pornography, Religion, and Tobacco. The policy mandates a "zero clients" aim for these industries.</p> <p>Responsible offboarding: The policy addresses the risk of legacy clients in these sectors by establishing a process to "move some clients out over time" in a responsible manner.</p> <p>Ethical deployment of technology: To address risks related to platform delivery (e.g., echo chambers), the Supplier Code of Conduct requires suppliers (including ad platforms) to commit to principles of fairness and accountability in their AI deployment</p>	<p>Own operations & client portfolio (downstream): The Sustainability Policy applies globally to all Precis companies. It specifically governs the sustainability portfolio, dictating which clients we accept and retain. This directly controls the downstream impact on consumers by preventing the promotion of unsafe products.</p> <p>Value chain (upstream): The framework extends to upstream partners through the Supplier Code of Conduct, which sets expectations for how technology partners manage their own operational impacts.</p>	<p>International human rights: The Supplier Code of Conduct requires respect for international agreements on human rights, which serves as a baseline for assessing the safety and dignity of consumers</p>	<p>In setting this framework, Precis has given significant consideration to the views of its workforce and society at large.</p> <p>Employee feedback: The strict stance on controversial industries was solidified partly in response to internal feedback where employees raised concerns about working with sectors that cause societal harm (as noted in the materiality assessment).</p> <p>Societal impact: The policy explicitly states that the "Social" angle of sustainability covers the ability to generate positive effects on society. The decision to exclude categories like gambling and tobacco is a direct consideration of the health and safety interests of consumers and end-users.</p>

Topic/Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives	Consideration of affected stakeholders
<p>Responsible marketing practices</p>	<p>Responsible business & sustainability framework (Comprising a wide range of policies, ranging from policies such as our: <i>Sustainability Policy, Supplier Code of Conduct, Employee Code of Conduct, marketing code of Code of Conduct, Sustainability (green and sustainability claims) in marketing Code of Conduct, as well as AI and data protection policies</i>)</p> <p>The primary objective of this policy framework is to ensure that our marketing services do not contribute to societal harm, exploit vulnerable consumers, or facilitate greenwashing. The policy manages the material risk of "irresponsible marketing" primarily through strict client portfolio management - controlling who Precis markets for to mitigate downstream harm.</p> <p>Key contents include:</p> <p>Exclusion of harmful sectors: To prevent the exploitation of vulnerable consumers, the Sustainability Policy mandates a "zero clients" aim for industries deemed controversial. This effectively rules out collaboration with actors in Gambling, Tobacco, Pornography, Politics, and Religion. This directly mitigates the risk of marketing addiction-forming or socially divisive products.</p> <p>Greenwashing prevention (high carbon industries): To address the risk of "greenwashing" and reputational damage from high-emitting clients, the policy imposes strict requirements on "High Carbon Impact Industries" (Fossil Fuels, Plastics etc). Precis will only work with such clients if they can demonstrate an industry-leading commitment to sustainability .</p> <p>Legal & ethical compliance: <i>The Supplier Code of Conduct</i> requires strict compliance with all applicable national and international laws, including fair competition and anti-corruption, which serves as the baseline for preventing misleading claims or fraud.</p>	<p>Own operations & downstream (client portfolio): <i>The Sustainability Policy</i> applies globally to the entire Precis group. Its primary scope is the management of the sustainability portfolio governing the onboarding and retention of clients. This scope effectively excludes high-risk actors from the agency's downstream value chain.</p> <p>Upstream (platform partners): <i>The Supplier Code of Conduct</i> extends to upstream partners (advertising platforms), requiring them to commit to principles of fairness and transparency, further supporting the responsible delivery of ads.</p>	<p>The policy framework refers to and commits to respect:</p> <p>The Greenhouse Gas Protocol: Used as the standard for accounting and reporting emissions, ensuring that "High Carbon" assessments are grounded in recognized frameworks.</p> <p>Sanctions lists: <i>The Supplier Code of Conduct</i> mandates compliance with UN, UK, EU, and US sanctions lists, ensuring marketing services are not provided to prohibited entities.</p>	<p>In setting this policy, the Precis prioritised the interests of society and end-users over short-term revenue.</p> <p>Societal impact: The framework defines the "Social" angle of sustainability as the ability to generate positive effects on society. The decision to exclude profitable sectors like Gambling and Tobacco was made specifically to avoid negative impacts on public health and vulnerable groups.</p> <p>Employee concerns: The materiality assessment notes that employees raised concerns about working with controversial sectors. The framework reflects this internal stakeholder feedback by establishing clear boundaries on acceptable client engagements.</p>

Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy

Approach to engagement

As a digital marketing agency acting as an intermediary between advertisers (our clients) and consumers, Precis typically does not engage directly with the end-users. Instead, we rely on credible proxies to understand consumer perspectives and needs.

Our primary proxies are:

- **Our clients:** We engage continuously with our clients to understand their consumer feedback, brand safety requirements, and target audience needs.
- **Digital platforms:** We utilise aggregated insights and policy updates from major advertising platforms (e.g., Google, Meta) to identify emerging consumer concerns regarding privacy and ad fatigue.
- **Industry research:** We monitor industry-level consumer sentiment reports regarding digital advertising and data privacy to inform our ethical guidelines.

Channels for raising concerns

While Precis does not maintain general customer service channels for the public, we have established specific channels for end-users to raise concerns regarding their most material interests: **Data privacy** and **Ethical conduct**.

- **Data subject rights channel:** In compliance with GDPR, we provide a dedicated channel (via email/webform) for end-users ('data subjects') to exercise their rights, including requests for data access, rectification, erasure, or objection to processing. This channel is monitored by our Legal/Data Protection team and DPO.
- **Whistleblower & ethics channel:** Our external-facing reporting mechanism allows any stakeholder, including the public, to report any concerns.
- **Platform mechanisms:** We acknowledge that end-users often raise concerns via 'Report Ad' features on publishers' platforms. We treat notifications from platforms regarding these reports as high-priority inputs.

Approach to remedy

In the unlikely event that Precis causes or contributes to a material negative impact on end-users (e.g., a data breach or an erroneous high-risk ad placement), our approach to remedy is centered on immediate mitigation and client cooperation.

- **Data privacy:** If a privacy violation occurs, our Data Policy mandates immediate investigation, notification to the relevant Data Protection Authority or client controller (as applicable) (and data subjects where required), and technical corrective action (e.g., data deletion or security patching).
- **Content/advertising:** For issues related to harmful or offensive content, our remedy process involves the immediate suspension of the relevant campaign, a root-cause review with the client, and the implementation of new vetting controls to prevent recurrence.



Actions

GDR-A

Topic/sub-topic	Description of key actions	Resources allocated / time horizon
Data privacy	<p>Mandatory privacy training program: Annual update and deployment of our annual GDPR and e-Privacy training module for all employees.</p>	<p>Resources: Internal Legal/IT Operating Expenses (Opex) and staff hours.</p> <p>Time Horizon: Ongoing; Training updated and deployed annually (Target: 95% by Q4 2026).</p>
Ethical content & non-discrimination	<p>Development of bias guidelines: Formal review and update of the "Bias and ethical content guidelines" to continue to address algorithmic and creative bias.</p> <p>Supplier screening (AI): Integration of ethical AI criteria (fairness, accountability) into the supplier due diligence process for ad-tech partners.</p> <p>Creative training rollout: Delivery of specific workshops for Creative and Media teams on the revised "Bias and ethical content guidelines" to continue avoiding stereotypes and ensuring representation in advertising.</p>	<p>Resources: Creative leadership & internal Legal time (Opex).</p> <p>Time Horizon: Revised guidelines finalized Q2 2026; Training completed Q4 2026.</p>
Access to quality information	<p>Content verification protocol: Creation of new "Content vetting guidelines" to assist employees in identifying and flagging misleading information or low-quality content.</p> <p>Onboarding integration: Updating the employee onboarding curriculum to include modules on professional judgment, accuracy, and misinformation risks.</p>	<p>Resources: Compliance/HR Opex.</p> <p>Time Horizon: Development in early 2026; rollout to 95% of staff by end of 2026.</p>
Health and safety	<p>Sustainability portfolio Screening: Updating of the formal "Decision tree" process during the sales qualification phase to automatically flag prospects in restricted sectors (politics, religion etc.).</p>	<p>Resources: Sales operations & Management time.</p> <p>Time Horizon: Screening is immediate/ongoing</p>
Responsible marketing practices	<p>Marketing ethics governance: Training for client-facing teams on the EU Green Claims Directive and the "Empowering Consumers" amendments to ensure they can advise clients against misleading claims.</p> <p>Media buying transparency: Deployment of the "Precis way" of media buying transparency with a strong emphasis on quality over arbitrage and no "junk" media.</p> <p>High-carbon assessment: Fine-tuning of the "High Carbon Impact" assessment framework to vet potential clients in high carbon industries against their sustainability commitments</p> <p>Whistleblowing channel promotion: Reinforcing internal awareness of reporting channels for ethical concerns related to client work.</p>	<p>Resources: Ethics Lead/Committee time; Legal Opex.</p> <p>Time Horizon: Process fully operational and 100% adherence by end of 2026.</p>

Approach to managing tensions with business pressures

Precis acknowledges that tensions can arise between our sustainability objectives and standard business pressures, particularly regarding marketing performance, sales growth, and data utilisation.

- **Resolution framework:** When a potential conflict is identified - such as a request to bypass data minimisation for better ad targeting - the matter is escalated to the marketing ethics committee. Our "stop-work" mechanism mandates that ethical and legal compliance takes precedence over short-term campaign performance.
- **Portfolio integrity:** Our sales teams utilise a formal "Decision tree" for all new client onboarding. In cases where a high-revenue prospect belongs to a restricted sector (e.g., gambling or religion), the policy provides no exceptions for financial gain, ensuring our long-term social license and reputation are prioritised over immediate turnover.
- **AI ethics vs. innovation:** We manage the pressure to adopt rapid AI innovations by requiring a Data Protection Impact Assessment (DPIA) for all new high-risk processing. If a tool's "black box" nature risks algorithmic bias, deployment is paused until mitigation measures are validated, even if it delays a competitive service launch.



Metrics

GDR-M

Topic/sub-topic	Quantitative and qualitative metrics	Relevance to IROs
Data privacy	Percentage of employees who have completed mandatory annual data privacy and GDPR/e-Privacy regulation training.	Mitigates financial risk: Measures the successful implementation of a key internal control (training) to mitigate the financial risk of regulatory fines, penalties, and litigation stemming from data privacy breaches or non-compliance (e.g., GDPR).
Ethical content & non-discrimination	Percentage of Creative and Media teams trained on internal bias and ethical content guidelines (including algorithmic bias awareness).	Manages negative impact: Tracks the proactive capacity-building and competency development necessary to manage the inherent ethical risk and negative impact of propagating bias, discrimination, or psychological harm through marketing content and algorithmic targeting.
Access to quality information	Percentage of operational employees who have successfully completed training on content vetting guidelines (including accuracy, reliability, and misinformation risk).	Manages negative impact: Measures the successful implementation of the new proactive process (training) to mitigate the negative impact of contributing to the spread of misleading or low-quality information, thereby safeguarding consumer trust and decision-making.
Health and safety	Share of total clients operating in the officially restricted categories (such as gambling, politics, pornography, religion, tobacco).	Mitigates reputational and financial risk: Direct outcome metric tracking the reduction of financial risk and reputational risk (e.g., greenwashing, employee dissatisfaction) by strategically reducing revenue dependency on clients in sectors that pose an indirect adverse impact on end-users' personal safety and well-being.
Responsible marketing practices	Completion rate (%) of the mandatory "Anti-Greenwashing & EmpCo Directive" training among all client-facing staff.	Manages reputational risk and negative impact: Serves as a primary control to ensure that client-facing teams possess the technical competency to apply the EmpCo Directive (EU 2024/825) standards, thereby reducing the scale and magnitude of potential harm to consumers

Disclosure of grievances and human rights incidents

In line with the requirements of the ESRS S4, we disclose whether grievances and human rights incidents connected with our consumers and/or end-users have been reported during the financial year.

We confirm that **zero human rights incidents** connected with our consumers and/or end-users were reported, identified, or substantiated during the reporting period.

Furthermore, we confirm that **zero formal grievances** connected with our consumers and/or end-users were reported, identified, or substantiated during the reporting period.

This reflects the operational effectiveness of our internal controls, policies, and grievance mechanisms designed to manage and mitigate material negative impacts across our services, particularly in the areas of data privacy, ethical content, and responsible marketing.



Targets

GDR-T

Topic/Sub-topic	Measurable, time-bound targets	Strategic objective
Data privacy	Achieve 95% completion rate for mandatory annual data privacy and GDPR/e-Privacy regulation training by Q4 2026, maintained annually.	To solidify the internal control environment and significantly mitigate the high financial risk of regulatory fines and litigation.
Ethical content & non-discrimination	(Phase 1) Finalise, approve, and officially launch the revised "Bias and ethical content guidelines" by Q2 2026. (Phase 2) Achieve 95% training completion on the new guidelines for Creative and Media teams by Q4 2026, maintained annually thereafter.	To establish the revised foundational policy and strengthen ethical competence, thereby proactively managing and mitigating the inherent ethical risk of bias and discrimination.
Access to quality information	Ensure 95% of operational employees complete the new content vetting guidelines training within three months of its launch in 2026, and achieve zero substantiated complaints related to client misinformation in 2026 and ongoingly.	To effectively implement the new proactive content verification process, mitigating the risk of spreading low-quality or misleading information and protecting consumer trust.
Health and safety	Maintain the share of total number of clients operating in the officially restricted categories at or below 1% through end of 2027, ensuring a zero-tolerance policy for new acquisitions in these sectors.	To control and stabilise the client portfolio in the short term, ensuring we minimise indirect adverse impact and prevent the reputational risk of expanding high-risk client relationships.
Responsible marketing practices	Implement a comprehensive Green Claims Policy and internal guidance across all markets before 27 September 2026.	Ensure compliance with the EmpCo Directive (Directive (EU) 2024/825) by updating internal standards for environmental marketing claims and providing mandatory training for all client-facing teams to prevent greenwashing.

Engagement in target-setting and performance tracking

Methodology and proxy engagement

Precis primarily impacts consumers and end-users indirectly through the digital marketing services provided to our clients. Consequently, we rely on our clients as credible proxies to understand the impact of our services on the end-user.

To ensure our sustainability targets remain relevant and effective, we integrated the following engagement insights into our target-setting process:

- **Validating targets through proxy feedback:** During our 2025 materiality assessment and subsequent target-setting for Privacy and Responsible marketing, we engaged with key clients to understand their end-users' primary concerns regarding data ethics and algorithmic transparency. This feedback was used to calibrate our targets to ensure they address the most pressing real-world risks facing end-users.
- **Tracking effectiveness:** We do not track performance in isolation. Our progress against S4 targets is reviewed alongside client satisfaction data and feedback from market sentiment monitoring. This allows us to assess whether our internal actions (such as data privacy training) are translating into better outcomes for end-users, such as a reduction in data-related concerns or more ethical campaign targeting.
- **Marginalised perspectives:** Through our dialogue with clients, we specifically addressed the risks of algorithmic bias. This helped us refine our target for "95% completion of Responsible AI training," ensuring the curriculum includes practical steps for identifying and mitigating impacts on vulnerable or marginalised consumer groups who may be unfairly targeted by automated systems.

ESRS G1

Business Conduct

This section outlines Precis's strategic approach to business conduct in accordance with ESRS G1. Our commitment to ethical operations is central to our reputation as a trusted partner in the digital marketing ecosystem.

As a service-based organisation, our primary governance focus is on fostering a corporate culture of integrity, ensuring transparency in media buying, and maintaining rigorous oversight of our supplier relationships.

While our direct exposure to high-risk jurisdictions is limited, we actively manage potential risks related to anti-corruption and bribery through robust internal controls and clear codes of conduct.



Policies

GDR-P

Topic / Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives
<p>Corporate culture & business ethics</p>	<p>Ethical business & integrity framework (Comprising a broad variety of policies and processes, ranging from our supplier and employee codes of conduct, Anti-discrimination policy and whistleblowing policy to our policies on media buying transparency, Anti bribery and Anti corruption as well as Anti tax evasion and many other topics and policies)</p> <p>The primary objective of this framework is to maintain a culture of high integrity and transparency. It addresses the material risk of reputational damage and loss of trust by establishing a "Better Safe Than Sorry" governance approach, ensuring that potential ethical breaches are identified and mitigated at an early stage.</p> <p>Key contents include inter alia:</p> <p>Full media transparency: Eliminates inherent conflicts of interest by replacing industry opacity with a commitment to quality over arbitrage and full client data ownership. This transparency mitigates the ethical risks of irresponsible marketing while ensuring every media dollar is accounted for. Transforms ethical media buying into a core sustainability practice that secures long-term financial value for clients and protects the digital ecosystem.</p> <p>Anti-bribery & corruption: A zero-tolerance stance on bribery, kickbacks, and improper inducements. It prohibits any gifts or hospitality that could influence business decisions and mandates legal consultation for any interaction with government officials.</p> <p>Anti-tax evasion: A zero-tolerance approach to all forms of tax evasion and its facilitation. It prohibits any transaction or activity intended to fraudulently evade tax obligations and mandates the immediate reporting of suspected violations through the Group's whistleblowing channel</p> <p>Employee Code of Conduct: Defines, together with our anti-harassment and anti-bullying policy, the mandatory requirements for integrity, professional judgment, and non-discrimination across all operations. It establishes the ethical baseline for employee conduct.</p> <p>Professional judgment: A mandate that employees use "common sense and professional judgment" at all times. This acts as a safeguard in complex situations where a specific policy might not cover every nuance of ethical behavior.</p> <p>Competing clients policy: Defines the governance of potential conflicts of interest when providing services to competing client entities. It mandates operational and digital segregation ("siloeing") between account teams to ensure the strict protection of client-specific sensitive and proprietary information and market confidentiality.</p> <p>Whistleblowing & non-retaliation: Provision of a secure, anonymous third-party reporting tool with a strict guarantee that no reporter will face disciplinary action or less favorable treatment for raising concerns.</p> <p>Workplace safety: Commitment to a drug free environment to prevent ill-health and accidents, ensuring that the physical and social work environment remains professional and safe.</p> <p>Supplier Code of Conduct: Establishes mandatory standards for ethical business conduct, human rights, labor protections, and environmental stewardship across the supply chain. It requires adherence to anti-corruption, data privacy, and fair competition laws while mandating human rights due diligence, safe working conditions, and greenhouse gas emission management. The policy reserves verification rights and identifies non-compliance as a material contractual breach.</p>	<p>Own operations: Applies globally to all branches of the Precis company group, including acquired entities. It covers all employees, board members, interns, and consultants.</p> <p>Value chain (upstream): The framework extends ethical requirements to all vendors via the Supplier Code of Conduct, requiring them to prohibit corruption and maintain high standards of integrity in their own operations.</p>	<p>The framework commits to and aligns with inter alia:</p> <p>United Nations convention against corruption: Alignment of anti-bribery measures.</p> <p>Whistleblowing standards: Use of a third-party encrypted platform for secure reporting in accordance with the EU whistleblowing directive (and its national implementations).</p>

ESRS G1 - BUSINESS CONDUCT

Topic / Sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives ^{2/2}
<p>Corporate culture & business ethics (Compliance & regulatory risks)</p>	<p>Data protection & regulatory compliance framework Comprising a large variety of formal policies, steering documents, agreements and processes, such as our general as well as client related data protection and and Security Policies.</p> <p>The main objective is to manage the complex landscape of privacy, cybersecurity and advertising regulations. The framework further addresses also the inherent risks with Precis' being affected, directly or indirectly, by the client's' own level of compliance.</p> <p>Key contents include inter alia:</p> <p>Governance & oversight: Systemic adherence to privacy regulations, such as the GDPR, managed by the Legal department with independent oversight from the Data Protection Officer (DPO).</p> <p>Operational controls: Mandatory maintenance of Records of Processing Activities (ROPA) and execution of Data Protection Impact Assessments (DPIAs) for high-risk processing.</p> <p>Rights management: Standardised procedures for the identification, verification, and fulfillment of data subject access and erasure requests.</p> <p>Security, cybersecurity and incident Management: comprehensive security, cybersecurity and risk management framework aligned with the NIS2 Directive. This includes, among other things, technical and organisational measures (TOMs), mandatory incident response protocols, business continuity planning, and securing the digital supply chain.</p> <p>Client risk mitigation: A strict mandate that employees set access permissions "as low as possible" and prohibits "Admin" rights to client accounts unless specifically requested and immediately revoked when no longer needed.</p> <p>Stop-work mechanism: When acting as a processor, the policy requires employees to notify clients and pause work if an instruction infringes on data protection laws.</p> <p>Transfer governance: Standardised risk assessment and legal mechanisms (e.g., SCCs) for international data transfers and third-party processor management.</p>	<p>Own operations: Applies globally to all Precis branches and all staff handling internal or client data.</p> <p>Value chain (downstream): Covers all client-facing service delivery as well as governs the relationship with clients, ensuring Precis only acts upon documented instructions and maintains a clear "firewall" against client-side regulatory failures.</p> <p>Value chain (upstream): Applies to the procurement and management of third-party vendors and sub-processors. The scope includes mandatory privacy due diligence and the execution of standardised Data Processing Agreements (DPAs), including audit rights, to ensure vendor-side adherence to Precis's data protection and security standards.</p>	<p>The framework commits to and aligns with:</p> <p>GDPR, the EU ePrivacy Directive and various national legislation: Core regulatory standard.</p> <p>EU AI Act: Framework for managing emerging AI regulations.</p> <p>NIS2 Directive and national cybersecurity laws: Framework for ensuring a high common level of cybersecurity, incident reporting, and supply chain resilience.</p>
<p>Management of supplier relationships</p>	<p>Responsible procurement & value chain framework (Comprising: Supplier Code of Conduct and Sustainability & Environmental Policy as well as data protection and security framework requirements)</p> <p>The objective is to ensure that Precis' upstream value chain reflects its own ethical and environmental standards. The framework addresses the material risk of supplier misconduct and negative social impacts, such as poor payment practices.</p> <p>Key contents include:</p> <p>The OTT/SaaS challenge: Explicit recognition that global tool providers often use "take it or leave it" terms. The policy addresses this by allowing for vetting via the supplier's own public ESG/Transparency reports when a signed Precis CoC is unobtainable.</p> <p>Remediation & renewal: Establishes that compliance is not just a one-time check but a requirement to be addressed during contract renewals and new vendor onboarding.</p> <p>Labor & human rights: Strict prohibition of child labor, forced labor, and unsafe working conditions. Suppliers must ensure their own sub-contractors comply with these principles.</p> <p>Payment practices: Operationalisation of the market practice of 30-day payment timelines to prevent negative financial impacts on smaller partners (SMEs).</p>	<p>Value chain (upstream): Applies to all suppliers, vendors, partners, and contractors. This includes the supplier's group, management, owners, and their sub-contractors.</p> <p>Own operations: Directs office coordinators and managers to "thoroughly screen" suppliers and confirm they have sustainability policies in place before finalising purchases.</p>	<p>The framework references and aligns with:</p> <p>ISO 14001 & 9001: Preferred standards for environmental and quality management.</p> <p>GHG Protocol: Standard for accounting for emissions from purchased hardware.</p>

Whistleblowing mechanisms and procedures

Precis maintains a dedicated, secure whistleblowing channel tailored to meet the requirements of the EU Whistleblowing Directive. The channel is hosted by an independent third-party provider called "Visslan" (<https://precisdigital.visslan-report.se/#/>), ensuring technical separation from company IT systems to guarantee anonymity.

- **Accessibility:** The channel is available 24/7 and is accessible to all employees (permanent and temporary), board members, and external stakeholders (including suppliers, freelancers, and former employees).
- **Languages:** Reports can be submitted in English or local languages relevant to our operating markets (e.g., Swedish, Danish, Norwegian etc).
- **Anonymity:** Reporters have the option to remain 100% anonymous throughout the process.

Upon receipt of a report, the following procedure is triggered:

- **Triage:** The report is encrypted and routed directly to designated whistleblowing case managers that are independent from Precis' management/board. If the report concerns senior management, it is automatically escalated to designated representatives of the HR and legal departments, or external professional such as DPO, to assess and ensure further escalation (on an anonymous basis where appropriate and/or required) to the board and/or relevant authorities.
- **Investigation:** A preliminary assessment is conducted within 7 days to determine validity. If grounds for investigation exist, an internal or external investigator is appointed.
- **Feedback:** In accordance with legal requirements, the whistleblower receives an acknowledgement of receipt within 7 days and feedback on the investigation's status or outcome within 3 months.

Precis adheres to a strict non-retaliation policy. Any form of disadvantage, threat, or disciplinary action taken against an individual for reporting a concern in good faith is treated as a gross misconduct offense, subject to immediate disciplinary action up to and including termination of employment.

Information regarding the whistleblowing channel is permanently available on the company intranet and website and is included in the mandatory onboarding package for all new joiners.



Actions

GDR-A

Topic / sub-topic	Description of key actions	Resources allocated / time horizon
Management of supplier relationships	We are updating our financial control procedures to enforce a "hard gate" in the vendor onboarding process. New suppliers cannot be created in the ERP/ Payment system without a signed Supplier Code of Conduct (or uploaded equivalent policy, such as a documented commitment to a relevant standard or own code of conduct that in all material aspects complies with Precis' Supplier Code of Conduct) attached to their master data record.	Resources: Finance Operations (Process update only) Horizon: Effective Q2, 2026 (Ongoing)
Corporate culture & compliance	Integration of the "Employee Code of Conduct" into the annual administrative cycle. We will utilise our HRIS platform (HiBob) to trigger an automated task requiring digital signature from every employee annually. Reminders will be automated to ensure 100% capture.	Resources: HR Admin (Workflow setup) Horizon: Q1 2026 (Annual Cycle)
Corporate culture & compliance	Deployment of updated anti-corruption training modules via HiBob learning platform. The action includes an automated escalation path: if training is not completed by Q4, the employee's line manager is notified to ensure completion before year-end.	Resources: L&D manager (Curating content) Horizon: Q3-Q4 2026



Metrics

GDR-M

Topic / sub-topic	Quantitative and qualitative metrics	Relevance to IROs
Management of supplier relationships	Percentage (%) of new, non-exempt suppliers onboarded during the reporting period that have adhered to the Supplier Code of Conduct (or equivalent).	Preventative control: Acts as a leading indicator for supply chain security. It confirms that the gate for new vendors is functioning and preventing the dilution of ethical standards as the company grows.
Corporate culture & compliance	Percentage (%) of total employees who have provided formal annual confirmation and sign-off of the Employee Code of Conduct.	Conduct risk reduction: Demonstrates the reach of the company's "tone from the top." Low rates would indicate a weakness in the formalisation of individual employee commitment to ethical policies.
Corporate culture & compliance	Percentage (%) of all employees and senior management who have completed the mandatory Anti-corruption and Anti-bribery training.	Financial risk mitigation: The primary defense metric against regulatory liabilities. It proves to auditors and regulators that the workforce is legally competent and aware of their obligations.
Whistleblowing (mandatory)	Total number (#) of reports received via the internal and external whistleblowing channels. (No target set, but disclosure is mandatory under ESRS G1-3)	Detection mechanism: Demonstrate that the grievance mechanism is operational and available.

Additional mandatory disclosures

Whistleblowing activity

The table below summarises the reports received through the Group’s internal and external whistleblowing channels during the financial year ending 31 December 2025.

Activity Metric	2025 data
Total reports received	0
... via internal channels (e.g., Management/HR)	0
... via external third-party channel (Anonymous)	0
Reports eligible for investigation	0
Investigations closed during the period	0
Average time to resolve/close a case	N/A

Confirmed incidents of corruption or bribery during the reporting period

Total confirmed incidents	0
Fines or legal proceedings	0 / None
Public legal cases regarding corruption	0

Political influence and lobbying activities

Precis does not make financial or in-kind contributions to political parties, politicians, or related institutions. During 2025, the total monetary value of political contributions was 0 SEK. Furthermore, Precis does not engage in direct lobbying activities.

Payment practices

Precis is committed to fair payment practices to support the liquidity of our supply chain.

- Standard Payment Terms: 30 days.
- Average Payment Time (2025): 22.8 days.
- Late Payments: 99% of invoices were paid within agreed terms.



Targets

GDR-T

Topic / sub-topic	Measurable, time-bound targets	Strategic objective
Management of supplier relationships	Achieve a 95% adherence rate to the Supplier Code of Conduct (CoC) for all new, non-exempt suppliers onboarded from FY2026 onwards.	Preventative control: Ensures that the expanding value chain aligns with Precis's ethical standards from the moment of entry, minimising the risk of introducing new human rights or labor issues.
Corporate culture & compliance	By the end of 2026, achieve 100% annual confirmation and sign-off of the Employee Code of Conduct (integrated into the annual policy package) for all employees.	To reduce conduct risk by formalising individual employee commitment to the company's core ethical policies and standards annually.
Corporate culture & compliance	By the end of 2026 (and annually thereafter), achieve a 95% completion rate for mandatory Anti-corruption and Anti-bribery training	Financial risk mitigation: To minimise the likelihood of liabilities (fines, legal costs) by ensuring a robust internal control environment where staff are knowledgeable of their legal obligations.

Entity-specific topic

Responsible AI

Precis has identified Responsible AI as a material entity-specific topic, reflecting its central role in our technology-driven service delivery and the associated potential impacts on individual privacy and algorithmic fairness. This section outlines the governance framework and operational controls established to ensure that AI adoption remains ethical, transparent, and compliant with emerging regulatory standards, including the EU AI Act.

Our approach integrates a risk-based methodology with “human-in-the-loop” oversight to mitigate systemic risks such as algorithmic bias while ensuring the integrity of our data-driven services and solutions.



Policies

GDR-P

Topic / sub-topic	Key policy contents	Scope of the policy	Third-party standards and initiatives
<p>Responsible AI</p>	<p>Responsible AI framework Comprising a variety of policies and processes, such as our general AI policy and guidelines, software (including AI) authorisation policy and tool/system vetting process, processes for content vetting and approval as well as general data protection policies and processes, supplier code of conduct, security policies.</p> <p>The primary objective of this framework is to mitigate the legal and ethical risks inherent in AI, such as the reinforcement of bias, generation of false data, and propagation of divisive content. The framework addresses risk where unethical AI use could lead to significant harm to consumers and reputational damage.</p> <p>Key contents include:</p> <p>Vetted and resilient AI ecosystem: Integrated ethical and technical vetting of AI tools to ensure EU AI Act and GDPR compliance and prevent bias, while enforcing NIS2-aligned security standards to protect infrastructure and data integrity against AI-specific threats.</p> <p>Bias and integrity controls: Policy and guidelines on how prompts and context affect outcomes, designed to prevent the unintentional propagation of misleading or harmful results.</p> <p>Human-in-the-loop (HITL) protocol: Mandates a "four-eye principle" requiring all AI-generated output to be reviewed by at least two individuals, including a peer with relevant client or subject-matter expertise.</p> <p>Linguistic & contextual verification: Requires native-speaker review for all AI-translated materials to ensure accuracy and cultural appropriateness.</p> <p>Regulatory & IP compliance: Enforces mandatory checks for compliance with marketing laws (e.g., restriction of unsubstantiated superlatives) and the protection of intellectual property, including the prevention of unauthorised use of competitor trademarks or slogans.</p> <p>Transparency & client approval: Transparency requirements about AI use towards clients. For certain services, specific prior client approval is required for AI tool usage. This ensures that the deployment of AI is transparent and aligned with client-specific ethical boundaries.</p> <p>Regulatory vigilance: A mandate to continuously monitor and align with global AI legislation (e.g., the EU AI Act) to ensure compliance and continued ethical and legal successful utilisation of AI.</p> <p>Future remediation: Recognition that while clear and comprehensive policy and processes as well as internal guidelines exist, a more advanced AI ethics framework is being developed by further expanding our current framework in order to ensure we stay on the forefront in responsible use of AI and to lower the long-term impact.</p>	<p>Own operations: Applies globally to all Precis teams, with specific emphasis on the Creative, Tech, and Data & Analytics. Covers all employees, consultants, and freelancers utilising AI tools.</p> <p>Value chain (downstream): Governs the delivery of AI-augmented services to clients, ensuring that "take it or leave it" platform-based AI (from major OTT providers) is managed with transparency regarding its limitations and potential for bias:</p> <p>Value chain (upstream): The supplier Code of Conduct requires AI tool providers to commit to principles of "transparency, fairness, and accountability" in their deployment.</p>	<p>The framework commits to and references:</p> <p>EU AI Act: The primary regulatory benchmark for risk-based AI classification and transparency.</p> <p>GDPR: Specifically regarding Automated Decision Making (ADM) and the protection of personal data within AI training sets.</p> <p>NIST AI risk management framework (NIST AI RMF): (Alignment) Following best practices for identifying and managing AI-related risks.</p> <p>NIS2 Directive and national cybersecurity laws: Setting the mandatory baseline for the cybersecurity and resilience of the IT infrastructure</p>



Actions

GDR-A

Topic / sub-topic	Description of key actions	Resources allocated / time horizon
Responsible AI (AI governance & control)	Consolidate and further expand all policies and processes into a consolidated company wide "AI Ethics Framework".	Resources: Internal working group (CTO + Legal Counsel) Horizon: Q2 2026 (Launch & Sign-off).
Responsible AI (training & awareness)	Expand training efforts by deploying an updated e-learning module on HiBob Learning. The content focuses on practical "dos and don'ts" of prompting, copyright risks, and bias detection, culminating in the mandatory quiz.	Resources: L&D manager time (to curate content) Horizon: Ongoing (Annual cycle).
Responsible AI (skills & competence)	Select 5 senior creative/tech leads to act as internal "AI ethics champions." They will continuously (at least annually) receive advanced briefing and legal training, and will be responsible for hosting quarterly "Lunch & Learn" sessions to upskill their respective teams on new AI risks.	Resources: Senior staff hours (approx. 4 hours/quarter per champion). Horizon: Ongoing (Review at end of 2026).



Metrics

GDR-M

Topic / sub-topic	Quantitative and qualitative metrics	Relevance to IROs
Responsible AI (AI governance & control)	Percentage (%) of total employees who have completed the mandatory "Annual AI ethics" training module. Status of the formal adoption of the consolidated and updated "AI Ethics Framework".	Risk management involves two key components: directly measuring the implementation of the primary control mechanism (the consolidated and updated framework) and ensuring the continuous competence of the workforce.
Responsible AI (training & awareness)	Percentage (%) of total employees who have completed the mandatory "Annual AI ethics" training module. Average score (%) achieved by employees on the post-training knowledge assessment (Target: >90%).	Prevention: Ensures the workforce is equipped to identify ethical risks before they manifest. High competence scores correlate with a reduced likelihood of human error in AI prompting and deployment.
Responsible AI (Skills & Competence)	Percentage (%) of operational employees rated as "Advanced" or "Expert" in Ethical AI practices during annual quiz.	Opportunity realisation: Tracks the buildup of internal capability, directly linking to the financial opportunity of positioning Precis as a "market leader" in ethical AI services.
Responsible AI (skills & competence)	Percentage of designated AI Ethics Champions completing annual advanced legal training; and the total number of cross-departmental "Lunch & Learn" sessions held per reporting period.	Directly monitors the mitigation of risks related to algorithmic Bias and regulatory non-compliance by ensuring technical leads possess the top level legal and ethical expertise in advance AI usage.



Targets

GDR-T

Topic / sub-topic	Measurable, time-bound targets	Strategic objective
Responsible AI (AI governance & control)	Achieve full operational implementation of the consolidated and updated AI Ethics Framework across 100% of core service areas utilising generative or predictive AI.	To mitigate high-magnitude ethical risks and ensure regulatory alignment (e.g., EU AI Act) by embedding control mechanisms directly into standard delivery workflows.
Responsible AI (training & awareness)	95% completion rate of "annual AI ethics" training.	To ensure the workforce possesses the necessary awareness to identify and escalate ethical risks, reducing the likelihood of inadvertent misuse or bias propagation.
Responsible AI (skills & competence)	Ensure that 95% of operational employees achieve a 90% annual quiz score to demonstrate "Advanced proficiency" or "Expert proficiency" in the updated and consolidated AI Ethics Framework (measured via post annual AI ethics training assessment).	To move beyond AI literacy and awareness to deep operational competence, ensuring that the reduction of negative impacts (bias/misinformation) is sustained systematically over the long term.
Responsible AI (skills & competence)	<p>Training Coverage: 100% of AI Ethics Champions to complete mandatory advanced legal/AI ethics briefing annually.</p> <p>Minimum of 4 documented knowledge-sharing sessions per AI Ethics Champion per year, starting 2026.</p>	To move beyond AI literacy and awareness and to institutionalise decentralised AI risk oversight and ensure that "Ethics-by-Design" is operationally embedded across all creative and technical workstreams.

Conclusion and final remarks

At Precis, our mission is to help great companies thrive in the digital economy through data-driven marketing. As the digital landscape evolves, we recognise that our responsibility extends beyond delivering performance; it encompasses the ethical management of data, the well-being of our people, and the environmental footprint of the technology we utilise.

Looking ahead: Our path for 2026 and beyond

This 2025 Sustainability Statement represents a baseline for Precis. By adopting the ESRS framework, we have not only enhanced our transparency but also deepened our internal understanding of how sustainability-related impacts, risks, and opportunities are connected with our long-term financial resilience.

As we look toward 2026, our focus will remain on refining our data collection processes, particularly within our upstream value chain, to move from spend-based estimates to primary data where possible. We are committed to the continued integration of our Responsible AI framework and the further alignment of our climate strategy with the 1.5°C pathway.

A final note on transparency

Sustainability is a continuous process of learning and adaptation. At Precis, we believe that the transparency mandated by the CSRD is a catalyst for innovation. By holding ourselves accountable to the standards set out in this report, we ensure that Precis remains a trusted partner for our clients, a supportive environment for our employees, and a responsible participant in the global digital economy.

We remain dedicated to iterating on our targets and improving our performance, ensuring that our growth as a digital marketing agency is both sustainable and ethical.

