

Qamcom Group

# Sustainability Report

# 2025.



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## GENERAL INFORMATION

### The Organisation Details.

Qamcom Group AB is the parent company of the group, with eight direct subsidiaries:

- Sensrad AB
- QG Innehavsbolag AB
- Qamcom ICX AB
- Ranatec AB
- Qamcom North America
- Paraqom Solutions AB
- Qamcom Group Consultancy AB owns
  - Qamcom Research & Technology AB owns
    - Qamcom Research & Technology NZ Ltd (New Zealand)
  - Layer Ten Collective AB
  - 2550 Engineering AB owns
    - Zelloscope AB
- Earin Development AB

### Omissions and consolidation principles.

Entities included in this report are those majority-owned and consolidated within Qamcom Group AB's audited financial report. Entities that are not majority-owned are omitted from this report.

### Our View of Sustainability.

We look at sustainability in a broad sense, adopting a stakeholder perspective that covers more than traditional environmental sustainability. We are members of UN Global Compact and report according to the Global Reporting Initiative (GRI) framework. Sustainability is becoming more intimately integrated across all aspects of the organisation, and we actively contribute to this broader perspective.

### Reporting Period.

This report covers the period 1 January to 31 December 2025, published in 2026.

It has been reviewed and approved internally and has not been subject to external third-party assurance.

## ACTIVITIES AND WORKERS

### Activities and Value Chain.

Qamcom’s mission is to create impact through technology, specialising in signal processing and electronic systems implementation, serving a broad range of industries.

In the value chain, Qamcom refines fundamental technology components, such as integrated circuits and other electronics, into systems delivered downstream to industry companies. Upstream procurement of electronics and mechanics carries embedded environmental impact, which is reflected in our material topics assessment where procurement practices have been identified as a new material topic for 2025.

### Other Business Relationships.

Qamcom’s business model relies substantially on partnerships, combining our technology expertise with the complementary capabilities of industry partners, sales and distribution channels, and funding partners. These collaborations may take the form of joint ventures, revenue sharing arrangements, or project-based incentives. All partners engaging with Qamcom are expected to operate in accordance with our Code of Conduct, which sets out our requirements on business ethics, human rights, and labour standards.

### Workers.

Category	Female	Male	Total
Number of employees	10	181	191
Number of permanent employees	10	179	189
Number of part-time employees	–	2	2

Region	Sweden	New Zealand	USA	Total
Employees	179	10	2	191

### Gender Balance.

Qamcom acknowledges that gender diversity remains an area for improvement.

The current gender split is 10 female (5%) and 181 male (95%).

Qamcom is committed to actively working toward a more balanced gender representation, particularly in technical and engineering roles, in alignment with its Code of Conduct values on equal treatment and non-discrimination.

## Corporate Social Responsibility Program Pillars.

Qamcom's CSR program rests on four pillars:

**Code of Conduct:**

Guidelines covering business ethics, anti-bribery, human rights, labor rights, conflicts of interest and whistleblowing. Where requirements differ from national law, the most ambitious requirement applies.

**Sponsoring, Charity and Gifts:**

Donations decided based on core values of Knowledge and Education.

**Environmental Policy:**

Formal commitment to meet or exceed applicable legal requirements; eleven defined actions guide short, medium and long-term implementation.

**Code of Ethics for Artificial Intelligence:**

Internal AI ethics code based on EU AI HLEG guidelines, ensuring lawful, ethical and robust AI development.

## DISCLOSURES ON MATERIAL TOPICS

### Process for Determining Material Topics.

Qamcom follows a six-step process:

- **Step 1**  
Start from GRI's list of potential topics.
- **Step 2**  
Cross-check with stakeholder engagement outcomes.
- **Step 3**  
Assess impact likelihood and consequence on a 5-point scale.
- **Step 4**  
Apply subjective review informed by stakeholder feedback.
- **Step 5**  
Approve the final list.
- **Step 6**  
Track annual progress and set targets.

### Scoring Methodology.

Each topic is rated on two axes, both 1–5:

**Likelihood:** how probable is it that this impact actually occurs in Qamcom's operations or value chain?

**Consequence:** how severe would the impact be if it did occur?

Topic	Likelihood (1–5)	Consequence (1–5)	Material?	Rationale and update basis
Oil and gas sector	N/A	N/A	N/A	Qamcom does not work within this sector.
Economic performance	1	2	No	External auditors continuously audit our financial books. As a privately held company with strong shareholder involvement, financial reporting risk is low.
Indirect economic practices	3	4	Yes	Qamcom participates yearly in government-supported research projects that provide results improving technology used in society. Education and knowledge creation are core focus areas with broad positive socioeconomic impact.
Procurement practices	2	4	Yes – New	Qamcom purchases significant volumes of electronics and mechanics for product development. These purchases embed large upstream emissions from raw material extraction, manufacturing and transportation, and represent the largest single category of climate impact in our operations.
Anti-corruption	2	3	No	Qamcom operates primarily in Sweden, a low-corruption jurisdiction. The Code of Conduct explicitly covers anti-bribery and conflicts of interest. As a B2B technology services company with strong shareholder oversight and external financial auditing, exposure to corruption risk is assessed as low.  No incidents have been reported.

## DISCLOSURES ON MATERIAL TOPICS (CONT.)

Topic	Likelihood (1–5)	Consequence (1–5)	Material?	Rationale and update basis
Anti-competitive behavior	1	2	No	Qamcom is a small consultancy company without the power to drive anti-competitive behaviour.
Tax	1	2	No	Qamcom does not have a tax strategy and does not actively work to minimise tax payments. Actively avoiding tax could have a material impact on the welfare of the countries in which we operate.
Materials	1	3	No	Services firm; minimal use of materials and no dangerous substances.
Energy	2	3	Yes – New	GHG Inventory quantified 18 t CO <sub>2</sub> e Scope 2. Wind assets (Avenir, Vinegi) divested. "Net positive" rationale no longer valid.
Water and effluents	1	1	No	Consulting services; limited impact on water.
Biodiversity	1	1	No	Consulting services; limited impact on biodiversity.
Emissions	3	4	Yes – New	Qamcom's total greenhouse gas footprint spans offices in Sweden, New Zealand and the USA, and the products and electronics it develops and procures. Air travel for client engagements is a significant contributor. The majority of emissions arise from purchased goods and business travel, both of which occur every year as part of normal operations.
Effluents and waste	1	1	No	Mainly services; waste largely recycled
Supplier environmental assessment	3	4	Yes – New	Electronics and mechanics suppliers drive approximately 60% of total GHG emissions. Purchased components are required to comply with REACH and RoHS regulations, providing a baseline for supplier environmental assessment.  Further development of supplier sustainability screening is planned for 2026.
Employment	1	1	No	Strong Swedish employment law protections in place.

## DISCLOSURES ON MATERIAL TOPICS (CONT.)

Topic	Likelihood (1–5)	Consequence (1–5)	Material?	Rationale and update basis
Occupational health and safety	3	2	Yes	<p>ISO-based risk management system active; incidents tracked and mitigated annually.</p> <p>In 2025, one incident of abusive treatment of an employee was recorded. The incident is currently under investigation and is being handled in accordance with Qamcom’s Abusive Discrimination Prevention Policy.</p>
Training and education	2	1	No	<p>Competence Development Policy documented.</p> <p>On-the-job learning offsets formal training gaps.</p>
Diversity and equal opportunity	2	3	No	<p>Equality &amp; Diversity Policy covers all diversity types. STEM gender gap persists but policy coverage improved. Not yet material.</p>
Non-discrimination	2	2	No	<p>At Qamcom we work collectively to ensure that discrimination does not occur. Documented Discrimination Prevention and Abusive Discrimination policies.</p>
Freedom of association	1	1	No	<p>All employees free to join associations; collective agreements used as reference.</p>
Child labor	1	2	No	<p>Forbidden by Swedish law; fully adhered to.</p>
Forced or compulsory labor	2	3	No	<p>Swedish law and working-hours monitoring in place. Social Workplace Policy explicitly addresses overwork culture.</p>
Security practices	4	4	Yes	<p>IT intrusion attempts remain high; industrial espionage risk undiminished.</p> <p>In 2025, one security incident was recorded involving a stolen computer from a subcontractor to Qamcom. The incident was investigated and resolved, and appropriate measures were taken to prevent recurrence.</p>
Rights of indigenous people	1	1	No	<p>Swedish law strongly protects indigenous people, and we comply with these laws.</p>

## DISCLOSURES ON MATERIAL TOPICS (CONT.)

Topic	Likelihood (1–5)	Consequence (1–5)	Material?	Rationale and update basis
Local communities	1	1	No	Good community relations maintained.
Supplier social assessment	2	3	No	Using suppliers who ignore social impact can cause serious harm. We usually select reputable suppliers from Europe and the US, where legal standards are stricter.
Public policy	1	1	No	Not politically active
Customer health and safety	3	2	No	The AI ethics code addresses risks of autonomous systems, such as autonomous vehicles.
Marketing and labelling	2	2	No	Products are subject to CE and similar certifications. Do not engage in consumer marketing or labeling beyond these requirements.
Customer privacy	1	1	No	Minimal customer data stored beyond business relationship requirements.

Scores are applied subjectively, but grounded in available evidence.

A topic becomes material when the combination of likelihood and consequence is high enough to warrant active management and disclosure.

The four new material topics are the key changes, all driven directly by the 2025 GHG inventory:

**Procurement practices:**

Raised because electronics/mechanics purchasing is now quantified as 60% of total emissions.

**Energy:**

Raised because the wind-asset divestment invalidates the previous “net positive” rationale.

**Emissions:**

First year with a formal GHG inventory; 515 t CO<sub>2</sub>e is now a known, measured fact.

**Supplier environmental assessment:**

Purchased electronics drives Scope 3 and directly implicate supplier environmental practices.

**Total material topics:**

7 topics to be considered for 2026.

## DISCLOSURES ON MATERIAL TOPICS (CONT.)

### Management approach disclosures

Management approaches for material environmental topics:

- Emissions, Energy, Procurement practices and Supplier environmental assessment, are described in the Environment section.
- Occupational health and safety is addressed through the Workplace Environment Policy and Social Workplace Environment Policy, detailed in the Policies section.
- Indirect economic practices are described in the Activities and Value Chain section.

## ENVIRONMENT

### Overview.

Qamcom's most significant climate impact lies within its value chain (Scope 3), driven by purchased goods, particularly electronics and mechanics, and business travel. Scope 1 is zero. Scope 2 from purchased energy is modest.

Total 2025 emissions: 515 tonnes CO<sub>2</sub>e (location-based).

### 2025 GHG Summary.

Scope	2025 Location-Based (t CO <sub>2</sub> e)	2025 Market-Based (t CO <sub>2</sub> e)	% of Total
Scope 1 – Direct	0	0	0%
Scope 2 – Purchased energy	18.2	9.8	~3%
Scope 3 – Value chain	496.7	496.1	~97%
Total	515	506	100%

## ENVIRONMENT (CONT.)

### Scope 1: Direct Emissions.

Zero. Qamcom has no stationary combustion facilities, no owned vehicles, and no recorded fugitive emissions.

### Scope 2: Purchased Energy.

Qamcom operates offices in Sweden, New Zealand and Denver, USA. Heating is the largest Scope 2 component. Market-based emissions are lower due to guarantees of origin held for parts of electricity consumption.

Energy Carrier	Location-Based (t CO <sub>2</sub> e)	Market-Based (t CO <sub>2</sub> e)
Cooling	4	0
Electricity	4	2
Heating	9–10	8
Total	18	10

### Scope 3: Value Chain

Three Scope 3 categories were identified as material through 2026 sustainability activities:

**Category 1:**  
Purchased goods & services

**Category 3:**  
Upstream fuel & energy activities

**Category 6:**  
Business travel

Category	t CO <sub>2</sub> e (2025)	Key Driver
Cat. 1 – Purchased goods & services	352.1	Electronics & mechanics ~88% (308 t). High uncertainty – spend analysis used.
Cat. 3 – Upstream fuel & energy	4.4	Upstream production losses from purchased energy.
Cat. 6 – Business travel	140.2	Air travel = 89% (125 t). Car travel = 9%. Hotel nights = 2%.
Total Scope 3	496.7	

## ENVIRONMENT (CONT.)

### Emissions per Company (2025).

Company	Scope 2 (t CO <sub>2</sub> e)	Scope 3 (t CO <sub>2</sub> e)	Total (t CO <sub>2</sub> e)	% of Group
QRT (Qamcom R&T)	13	329	342	66%
Ranatec	0	76	77	15%
Sensrad	1	66	67	13%
2550 Engineering (inc. Zelloscope)	2	18	19	4%
ICXAB	–	6	6	1%
Layer 10	1	1	2	< 1%
QNA (Qamcom North America)	1	0	2	< 1%

### Historical Trend 2021–2025.

The scope of the inventory has expanded each year.

2025 figures for Category 1 include broader entity and goods coverage.

Year	Scope 2	Cat. 1 Goods	Cat. 6 Travel	Total (t CO <sub>2</sub> e)	Note
2021	22	73	26	126	Narrow scope
2022	21	77	485	589	High travel year
2023	20	75	673	775	Peak travel year
2024	18	69	99	191	Reduced travel
2025	18	352*	140	515	Expanded scope*

\* 2025 Cat. 1 expanded to include electronics & mechanics, lab equipment and engineering/IT services.

## FINANCIAL SUSTAINABILITY

Qamcom is committed to long-term financial sustainability guided by the following principles:

- Qamcom should operate as a profitable company, thereby maintaining control over its own investments and development in order to fulfil its strategic and sustainability goals.
- Qamcom pays tax in full accordance with applicable law in all jurisdictions where it operates, and does not seek to minimise tax obligations through specific or tailored arrangements. We believe that healthy corporations have an important role to play in building sustainable societies, and that paying tax is a meaningful contribution to the communities in which we operate.

## OUR POLICIES

The Systematic Work Environment Policies document provides detailed, current versions of all workplace policies.

This section presents the full scope of policies.

### Policy Governance.

All policies are owned, versioned and maintained in the Qamcom Document Database (QDD). Policies are presented to employees during onboarding; all employees sign confirmation of having read and understood them. Policies are reviewed annually and revised as necessary, then presented to the Board of Directors for approval.

### Workplace Environment Policy.

Qamcom actively works to create a socially, physically and mentally sound workplace by preventing risk of workplace injuries and work-related health issues. The minimum requirement is to comply with all relevant laws and regulations and to ensure systematic environmental work is carried out as an integral part of ordinary operations.

#### Key provisions:

- Work environment is integrated into daily activities; every business decision references its impact on the work environment.
- Employees must not have an unhealthy workload; resources are distributed according to need.
- A safety representative must be appointed if the business has at least five employees at the same office. A Safety Committee is required if the business has more than 50 regularly employed staff.
- The employer must ensure managers have knowledge to prevent and manage risks in the physical, social and organisational work environment.
- Working hours scheduling must not lead to health issues; recovery time must be planned, especially for night work and shift work.
- If certain work poses an immediate and serious danger to employees' life or health, the safety representative may decide that work shall be interrupted pending review by the Swedish Work Environment Authority.

### Social Workplace Environment Policy.

Qamcom strives for an inclusive company culture where colleagues care about each other's situation. Because the business is run without formal managers, extra responsibility falls on all employees to be perceptive and understanding about others' work situations.

#### Key provisions:

- Open project planning and resource allocation – no one should be constantly overloaded; meetings are open and everyone may attend to influence their situation.
- Project managers visualise forward and retrospective progress to all team members; time plans must be realistic.
- No expectation to check or answer emails outside working hours. Overtime only when strictly necessary.
- Co-workers are encouraged to comment on each other's workload as a form of mutual care.
- Education in conflict resolution and spotting signs of stress, illness or drug abuse is supported.

## OUR POLICIES (CONT.)

### Equality and Diversity Policy.

Equality means women and men have the same rights, opportunities and obligations. Diversity means all people have equal value and human differences enrich the business.

#### Key provisions:

- Recruitment is based on competence; the composition of employees at all levels should reflect society.
- No employee shall be subjected to sexual harassment or harassed because of a discrimination complaint.
- Equal pay for work of equal value. Annual payroll surveys are conducted to detect and correct unjustified pay gaps between women and men.
- All employees have equal opportunities for employment, training, promotion and development.

### Competence Development Policy.

Individual competence development is crucial. The most effective development occurs when integrated with project work.

Online training is encouraged as an efficient and environmentally friendly method, combining self-directed learning with approved discussion-based training.

### Harassment Prevention Policy.

Harassment and sexual harassment are not tolerated.

All types of harassment are a serious threat to job satisfaction, health, finances and development. Harassment is defined under seven grounds: gender, gender identity or expression, ethnic affiliation, religion, disability, sexual orientation and age.

Action plan: Investigations must be objective and thorough. Sanctions include warning, relocation, or termination.

### Discrimination Prevention Policy.

Covers six types of discrimination under the Discrimination Act: direct discrimination, indirect discrimination, lack of accessibility, harassment, sexual harassment and instructions to discriminate.

Active measures against discrimination are implemented in four steps: examine risks, analyse causes, implement measures, follow up and evaluate, across five areas: working conditions, pay, recruitment, education and work-life balance.

## OUR POLICIES (CONT.)

### **Abusive Discrimination Prevention Policy.**

Based on AFS 2015:4. Abusive discrimination (bullying) is acts directed against workers in an offensive manner that may lead to ill health or exclusion from the workplace. Examples include withholding information, deliberate sabotage, exclusion, threats, mockery and unjustified administrative penalties.

Action plan: Investigations must be carried out quickly and objectively; sanctions may include warning, relocation or termination.

### **Drugs and Abuse Prevention Policy.**

Abuse of alcohol or other drugs cannot be combined with work. Qamcom workplaces are drug-free. Every employee has a moral responsibility to act if drug or alcohol abuse is suspected. Qamcom's stance is that the abuse must be addressed, not the employee dismissed.

Detailed action plans cover: suspicion of impairment, confirmed knowledge of abuse, an employee appearing impaired at work, relapse situations, and rehabilitation programmes.

### **Whistleblower Policy.**

Staff can escalate and report any observations suspected to be a violation of Qamcom policies. Reports can be made anonymously. Trust is a cornerstone. All critical concerns are logged for reference and action.