



Creating a Difference with Every Holiday

SUSTAINABILITY & CORPORATE
SOCIAL RESPONSIBILITY REPORT 2020



Nordic Leisure
Travel Group

CONTENTS

A word from the CEO3

About our Report5

Our Business6

Vision & Philosophy8

Classic package holidays 8

Dynamic packaging 8

Cruise..... 8

Stakeholders and partnerships 9

Our Vision for Sustainable Tourism11

Sustainable Development Strategy for The Future11

The Ten Principles of the UN Global Compact12

Management of sustainability 12

Materiality assessments 13

Risk Management 14

Crises management15

Nordic Leisure Travel Group Policies and Guidelines16

Code of Conduct 16

Group Supplier Code of Ethics and Conduct . 16

Sustainability Policy 16

Environmental Policy 17

Child Protection policy 17

Charity & Social engagement policy 17

Anti-bribery and corruption..... 17

External auditing 18

Environmental performance20

Airline operation..... 20

Resort & Hotel operations 21

Our plastic commitment26

Human Rights & Social Responsibility28

Community & Charity engagement 28

Our Staff29

Auditors Statement31

Engagement and responsibility 31

The scope of the audit..... 31

Opinion31

A word from the CEO

As the leading holiday company in the Nordics, with a presence in many destinations around the world, we have a responsibility to act sustainably and to continue increasing the positive impacts of tourism, while at the same time minimizing our negative impact, such as our climate footprint. Tourism is one of the driving forces of global economic growth. Providing 1 in 10 jobs worldwide, as well as 10 % of world GDP, tourism can stimulate inclusive economic and social development and sustainable investments, promising a substantial role in the achievement of the 2030 Agenda. Our responsibility is to enhance our contributions.

With our long history and several decades of working together with partners in our destinations as well as at home, we have, and will continue to, contribute positively to the communities where we work, live, and travel. Having control of all parts of the holiday journey makes it possible for us to optimize each journey also from a sustainability perspective, from take-off to touch-down. Acting as a sustainability leader within our industry, we take pride in our continuous drive for positive change.

This report summarizes our efforts and the progress achieved during the last fiscal year, a year for the history books. We have gone through the most challenging times in our company’s history with the ongoing pandemic. With our new owners in

place, our sustainability focus remains. We never stop challenging ourselves and have continued improving our way of operating more sustainably.



Some of the highlights from this year:

- Our own airline ranks as one of the most efficient airlines in the airline industry, having delivered an average footprint of 66 grams of CO₂ per passenger km during this financial year. This is close to half the global industry average.
- We currently offer the most extensive offset program in the entire travel industry: All flights, regardless of airline, all stays at our own hotels and all bus-transfers between airports and hotels are fully CO2 compensated, through Natural Capital Partners.
- All our own hotels operate under some of the most stringent sustainability requirements in the market and most comply with the internationally recognized Travelife program.

Nordic Leisure Travel Group is here to create new memories together with our guests and to make sure our guests will have the best weeks of the year when traveling with us. We are also here to further improve the positive impact from tourism and to minimize our climate impact, and our ambitions are extensive.

We are currently working on setting our long-term sustainability strategy framework, reaching further into our future than our previous three-year plan. This framework will be a clear guideline for ourselves and our efforts to improve our way of doing business.

I would like to take the opportunity to thank our more than 2 000 employees, all of whom are making it possible to progress and create change towards a more sustainable holiday experience each year.



MAGNUS WIKNER
CEO, NORDIC LEISURE TRAVEL GROUP



About our Report

Nordic Leisure Travel Group has been working with sustainability for many years. It was one of the first tour operators in the industry to take up sustainability and environmental topics and establish a serious and structured approach to reduce the impacts arising from travel. We continue to see it as our responsibility to promote sustainable tourism, where we contribute to positive economic and social development while minimizing environmental impact at home and abroad. We are embedding sustainable practices in all parts of our business and engaging our colleagues, customers, suppliers, owners, and other stakeholders in our endeavors.

This report constitutes our statutory statement of social responsibility in accordance with the relevant local legislation in the countries where the company is represented, as mentioned below. The overall responsibility for this report and its content rests with the Board of Directors. The board consists of representatives from the circle of owners and the senior management of the company.

This report also provides a comprehensive assessment of our strategy and approach as well as an overview of our performance during the period of the reported fiscal year.

The reporting period is 1st October 2019 to 30th September 2020, unless otherwise stated.

Our sustainability impacts and work are global, and this is reflected in our policies, measures, and key data. If you have any questions related to this report, please address them to:

Nordic Leisure Travel Group AB
S-105 20 Stockholm
SWEDEN
Attention:
Fredrik Henriksson,
Head of Communication & Sustainability
Phone: +46 8 5551 31 24

The report covers
Nordic Leisure Travel
Group Holdco AB
including the mentioned
affiliated companies:

Country	Company Name
Sweden	Nordic Leisure Travel Group Holdings AB
Sweden	Nordic Leisure Travel Group AB
Sweden	Ving SVEAB
Sweden	NLTG Hotels Holding AB
Denmark	Nordic Leisure Travel Group DK A/S
Denmark	Spies A/S
Denmark	Sunclass Airlines Holdings A/S
Denmark	Sunclass Airlines Aps
Finland	Oy Tjareborg Ab
Norway	Ving Norge AS

Our Business

NLTG Holdco AB is the parent company for Nordic Leisure Travel Group (hereafter referred to as NLTG) and of our Nordic travel companies, Ving, Spies and Tjareborg. Overall, the group is the Nordic region’s largest tour operator.

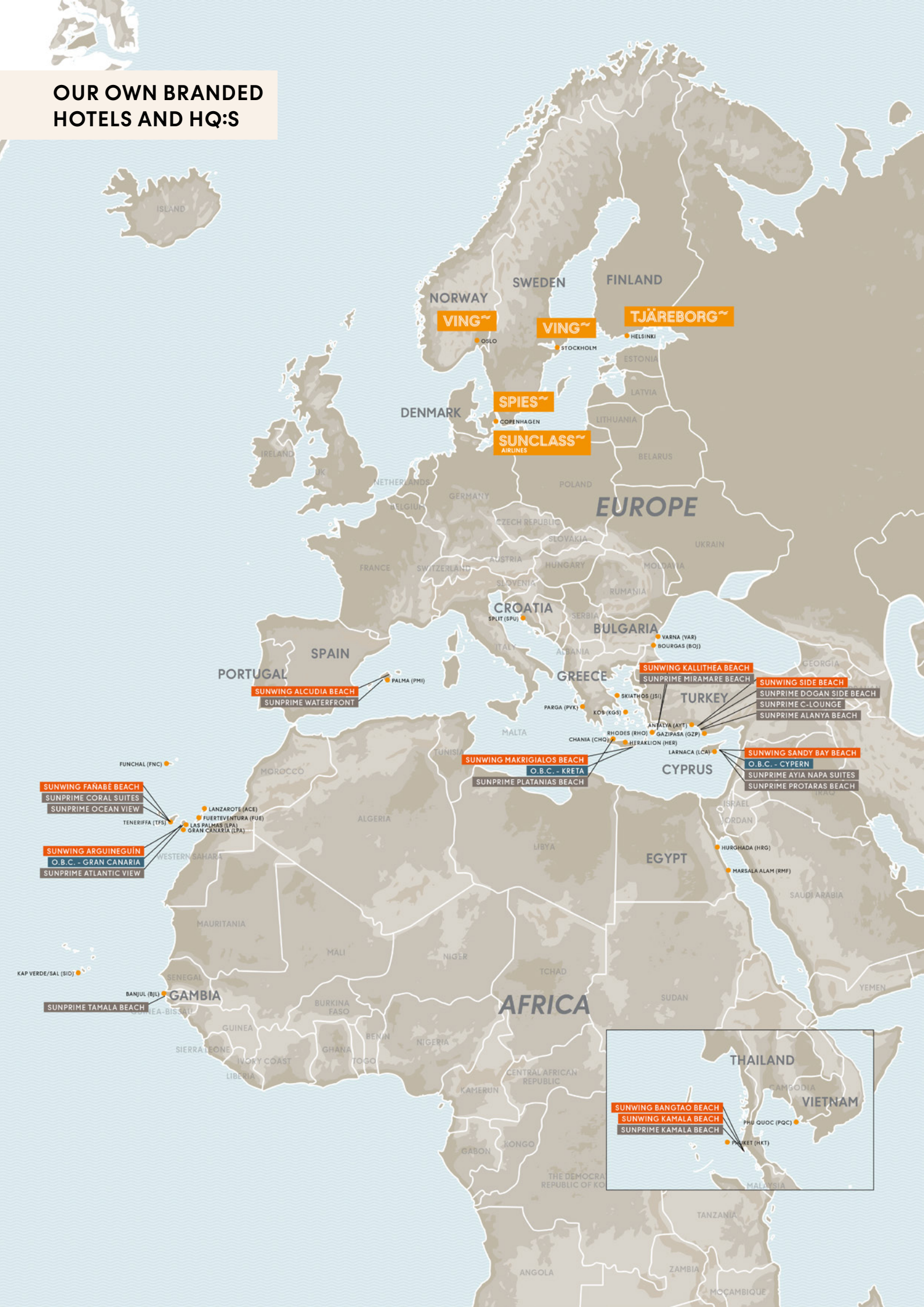
NLTG operates its own airline and hotel operations as well as with partners. Sunclass Airlines is among the largest charter airline operators in the Nordic region. Well-known hotel products such as Sunwing, Sunprime and Ocean Beach Club by Sunwing serves as a residence for thousands of happy and satisfied guests during their best weeks of the year.

In a normal year the Nordic Leisure Travel Group sells more than 1.6 million holidays across our Nordic source markets. However, the circumstances surrounding the covid-19 pandemic have had a significant impact on the business’ organization and overall activities during the 2019/20 financial year. As a result, the company will deliver a reduced turnover; approximately 4.8 billion SEK. The basic information below reflects the conditions at the end of the financial year (SEP20).

Number of:

- Customers: 433 837
- Owned brand Resorts & Hotels: 25
- Aircraft: 10
- Source markets: 4

More information about our financial performance for the fiscal year 2019/20 is available online.



Vision & Philosophy

Our vision is to be the leading Nordic holiday company. Our philosophy is that we are not just selling trips, we are creating expectations, experiences, and memories. Our aim is that our guests should have the best weeks of the year when going on holiday with NLTG, and it should be fun, developing and rewarding to do a good job as an employee in the company.

The package travel business is complex and wide reaching. Our vision is to be the most loved holiday company. To deliver on this promise we are engaged in decisions, both large and small, from creating and delivering world class experiences, to increasing our fuel efficiency and reducing plastic and other waste at home, on the journey and in destinations. Within the Nordic Leisure Travel Group, we are continuously working toward greater efficiency and higher quality in our products and day-to-day operations. Our roots are Nordic, but we have a presence at many international destinations. However, we organize ourselves and operate as One Company and take advantage of the benefits it brings. In all parts of the business, we always strive to aim in the same direction, and we base our business foundation in a common culture to ensure the necessary framework and space for diversity and human differences.

Our sustainability approach is a fundamental part of this vision and it is an important part of the efforts we make every single day to achieve our business goals. The specific efforts are described in this report.

CLASSIC PACKAGE HOLIDAYS

The heart of our business is classic package holidays, consisting of charter flights taking our guests to our own hotels as well as contracted hotels around the world, where we strive to deliver the best weeks of their year. To deliver this product we use a wide range of suppliers and partners such as airlines, hoteliers, tax free product suppliers, clothing suppliers, excursion providers, cleaning and laundry services, food and beverage services, and IT services.

DYNAMIC PACKAGING

Our complimentary offering consists of travel where the customers decide where they want to go, for how long, and where they want to stay. We provide bookings with regular airlines and many hotels worldwide that live up to our health and safety standards, but where we ourselves do not deliver the services. For this type of travel our main suppliers are airlines and bed bank services.

CRUISE

We have a high-quality cruise offering in addition to our other package travel. Cruise holidays are provided by cruise lines and booked by our customers through us. We provide additional services, such as connecting flights and hotel nights, as requested by the customer.

STAKEHOLDERS AND PARTNERSHIPS

We work with a variety of sustainability and industry organizations as we understand that collaboration is essential to bring about large-scale change. We are particularly committed to working with our supply chain, and selected stakeholders within the travel industry to create positive change.

We define stakeholders as any group with potential or actual influence on our business, including customers, employees, investors, suppliers, governments & regulators, NGOs & charities, academia, and industry associations. To ensure that we focus on the most material issues and those most relevant to our key audiences, we undertake a wide variety of stakeholder engagement including meetings, questionnaires, newsletters with feedback channels and participation in projects and conferences.

Our stakeholders include:

- Customers
- Employees
- Investors
- Suppliers
- NGOs and charities
- Governments and Regulators
- Academia and industry associations



Our Vision for Sustainable Tourism

We know that the thousands of people who choose us as their tour operator have high expectations on us, as well as on the product we deliver. We are also aware that they value the environment and the capacity for sustainable behavior, just as we do. That is why we make a great effort to adapt our products and activities so that they have as low an impact as possible. We are convinced that sustainable adaptation is an important criterion for long-term success for our company and that we need to build a strong business-aligned strategy, whilst at the same time maintaining a rigorous approach to sustainable adaption.

SUSTAINABLE DEVELOPMENT STRATEGY FOR THE FUTURE

Our vision is to make a difference with every holiday. Along the way on our journey we will care for all aspects of sustainability during the entire customer journey – **We want to create a difference with every holiday we deliver, and we care for all aspects of sustainability for the entire customer journey.**

Over the past decades, we have delivered great results and we plan to continue to do so in the future. Our efforts today are built on a rigorous and target-oriented program, reflecting several key stages of the customer journey. **We want to go gently forward and to act with care in everything we do.**

As the world around us is changing and with a solid and ambitious sustainability vision as ours, we have decided to further develop our strategy and plans to meet our own high expectations for delivery in the future. This new framework will form the basis for our new and industry leading strategy effective from 2021 to 2030 and even further into the future.

In the long run we aim for zero-impact from all our activities no matter where and how we operate. On the road to zero-impact, we want to deliver 100 % climate emission compensated travel products, free ourselves from the use of disposable plastic

and other harmful materials, convert to renewable energy sources at our own Sunwing, Sunprime and O.B.C. by Sunwing resorts, and in two phases, build new hotels for the future which have a zero-fossil energy profile and subsequently a zero-impact on climate and local environment.

The new and ambitious strategy is under preparation and will be launched early 2021 setting more clear deadlines for each step on our way towards zero-impact.



Our mission is to take a position as the leading holiday company in sustainable travel.

The Ten Principles of the UN Global Compact

We believe that corporate sustainability starts with a company’s value system and a principle-based approach to doing business. This means that we operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption. Our responsible business approach applies with the same values and principles wherever they have a presence in any part of our business operation, in places we and our customers use and when we interact with people across the world. We support the **10 principles of the United Nation Global Compact** and align the principles with our business Code of Conduct guidelines.

Our strategies and target plan are connected to, and support, relevant **UN’s global development goals**. that works for a more sustainable future for all. Our social and environmental engagement will have a particularly positive effect on selected GDG goals.

Within the fiscal year 19/20, we have used several third party certified environmental programs in

different parts of our operations, in support of our ambitions and effort.



MANAGEMENT OF SUSTAINABILITY

The Senior Management team retain responsibility for the overall success of the Nordic Leisure Travel Group, and that sustainability is an integral part of the company’s business vision and strategic plans. They oversee and provide an overall direction. The day-to-day responsibility for development and oversight of relevant policies and operation is placed in the central sustainability organization. The Sustainability team is organizationally placed under the group’s communications department with a direct line to the senior management of NLTG and with cross-reference to the strategic unit of the group. In this way we ensure that compliance is continuously aligned with stakeholder requirements, management directions and group strategies.

A solid governance structure is in place across the company. It helps us to be aware of factors that may affect the business and the interests of our stakeholders in short, medium, and long term, and to act accordingly. The process is anchored from the board to the top management layers and down to the operational levels.

NLTG operates in four different source markets. The Nordic countries are similar in many ways, but there are visible and important variations in the structure of society and within legislation and thus different challenges that must be addressed. This means that sustainability risks must be managed in different ways across the business depending on requirements and priorities.

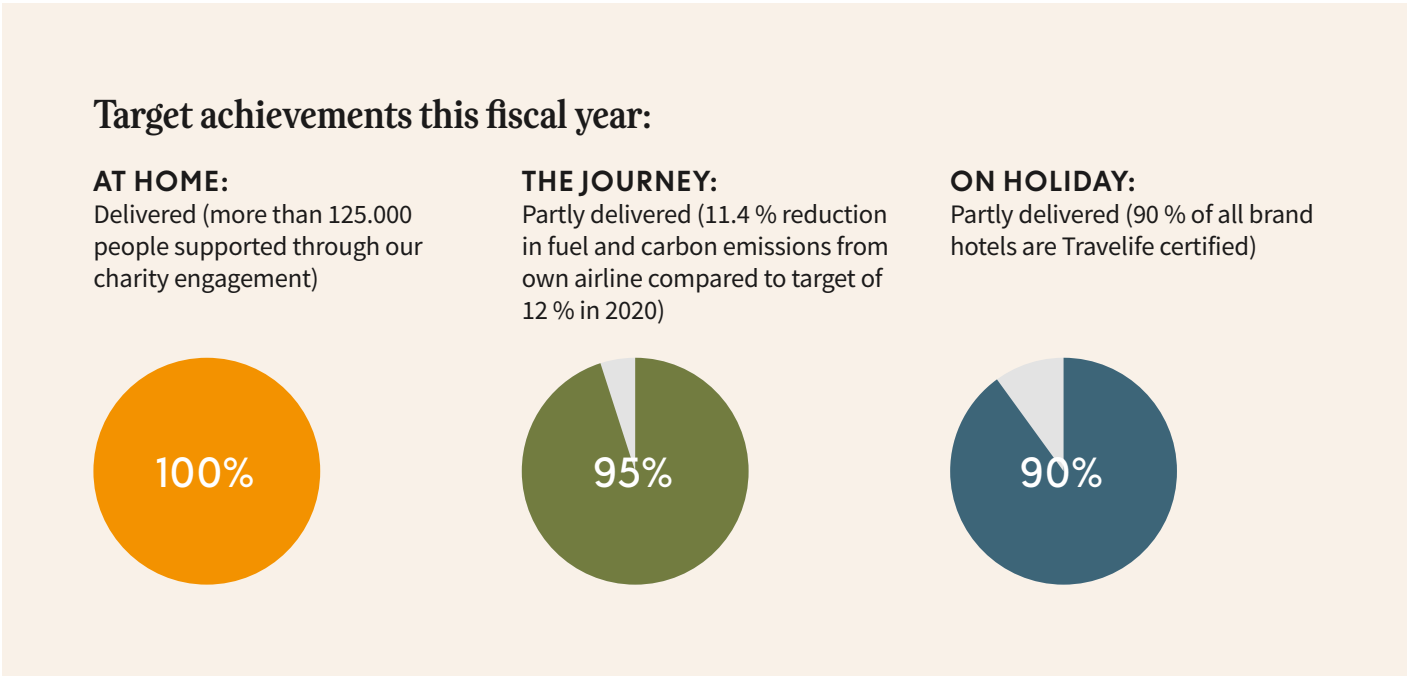
Identified impacts and risks appear from our sustainability materiality analysis.

MATERIALITY ASSESSMENTS

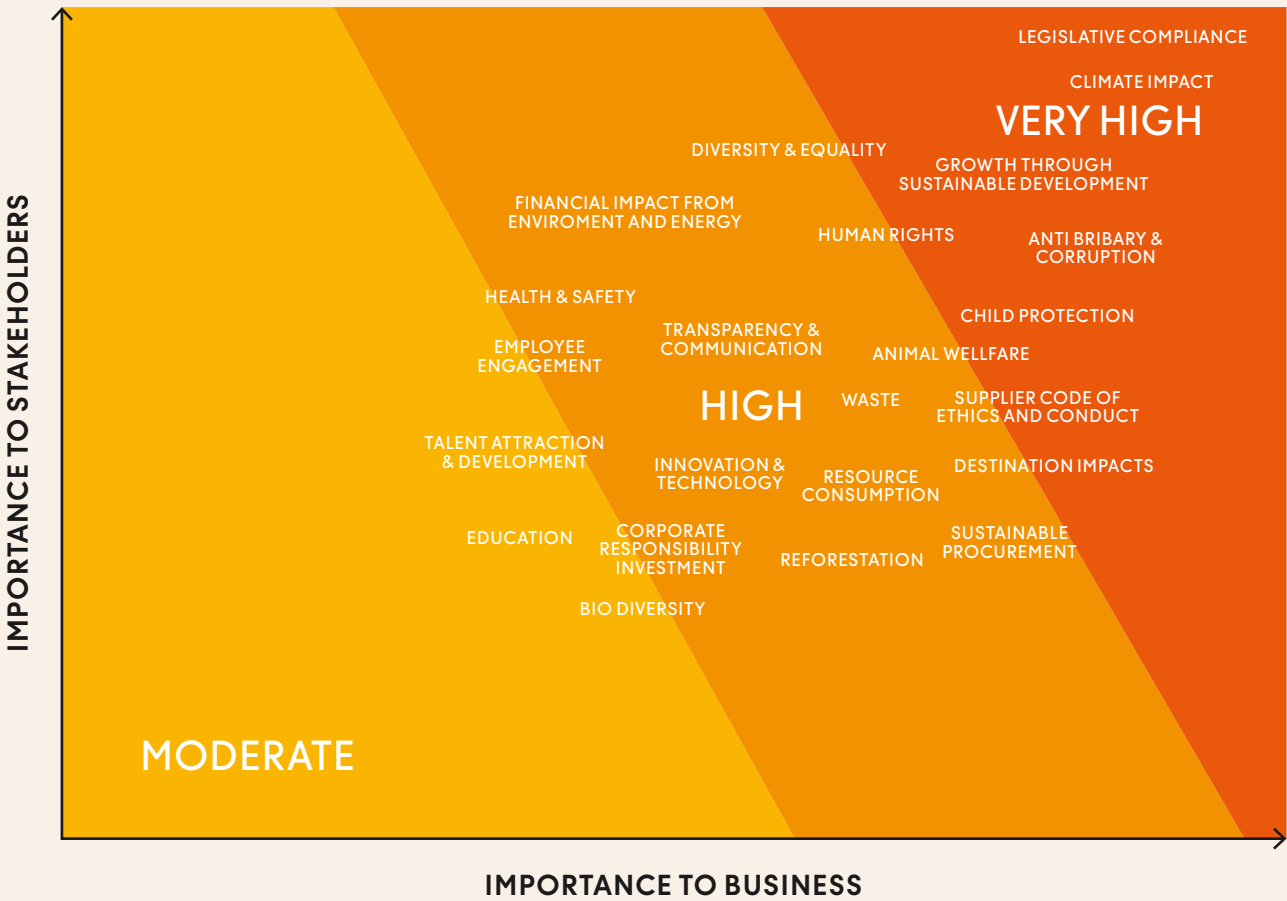
On an on-going basis we conduct internal materiality assessments of our environmental impacts and CSR commitments to help us better understand the changing landscape around us, and to evolve our sustainability strategies and tailor our efforts so that it aligns with our strategy and the obligations our operations is subject to. The responsibility of the assessment process is with the group sustainability management team. The outcome of the process is subsequently anchored with the Senior Management and Group Risk Management team.

The mapping process has revealed several important matters that we consider essential to either our stakeholders, the business, or the corporate social responsibilities to which we are committed.

Lack of focus and ability to adapt to the identified factors can lead to damage to the company’s repu-



Nordic Leisure Travel Group 2020/21 Sustainability Materiality Assessment





We have not identified any external or internal environmental or CSR factors in the past financial year which could harm the business now or in a near future perspective.

tation, ability to compete, increase operating costs, impact in the supply chain, contribute to loss of employee talent and skills and apply negative impacts in destinations we and our many customers visit every year.

The climate impact is the most important sustainability factor right now, which has the strength to harm the company in a longer perspective. However, NLTG has for many years had a strong focus on reducing emissions and in 2019 a new step was taken to address airline emissions, by introducing a wide-covering climate compensation program as a first step.

RISK MANAGEMENT

NLTG Group maintains a robust risk management framework to enable the identification and mitigation of risks faced by the business in achieving its strategic objectives. The objective of the framework is to embed proactive risk management into day to day operations, that promotes risk awareness in decision making and better integration of the Group.

All our Group businesses maintains a structured risk management process, which proactively identifies, assesses, evaluates, enables decision making regarding mitigations and reports on risk arising from the Group's activities.

Risk Management in Sustainability

We operate in a dynamic and rapidly evolving industry. This requires a flexible and responsive risk management process. Risks are evaluated using a risk register approach which assesses the likelihood

and impact of each risk, including the financial impact, alongside existing control measures managed by our Risk Management & Compliance team.

Significant sustainability risks include:

- **Brand reputation**
We are aware that reputational challenges have an impact on our business revenue and brand value. Risks include third-party deliveries and ethics, competitive attacks, and hazard or other catastrophes. We also see subjects related to regulatory compliance, employees, and executive misconduct as potential risks. Risks are managed by ensuring that performance always match expectations. We are aware that proper handling determines whether value or loss is created.
- **Climate Change and greenhouse gas emissions**
Climate change is a global challenge and a threat to all holiday travel organizers. Warmer atmospheres, rising water levels and impacts on humans pose a risk that travel in the future may not be as we know it today. Some destinations will not be available and new locations will have to be found to maintain a business foundation. Furthermore, aviation, which is a central part of the current product, is exposed to a significant risk of impact, and will require extensive change over time.
- **Energy cost and energy security**
As a travel company, we depend on efficient energy supplies. We use large amounts of raw materials as an energy product in our own airline and have electricity supplied from supply systems to our hotels around the world. It is crucial that the supplies are protected and that the prices are stable so that we can ensure the operation of the company.

- **Supply chain management**
Operators in the travel industry are exposed to risk of failure of deliveries in products or services. For our business there is a risk that there may be a lack of key supplies for our core operations, in particular our hotel and airline operations. In these cases, we will not be able to provide the services we offer our customers and the business is thus affected financially.
- **Recruitment and retention of talent**
Our success is driven by our ability to attract talent and to provide a framework that enable them to deliver our strategy and bring the business forward. If the company does not maintain a firm grip, there is a risk that in the long run it will not be able to attract the right talent and to create a foundation for future presence.
- **Sustainability of destination**
As a holiday travel provider, we are exposed to a risk in the event of incidents or changes to the destinations we use. This can include natural catastrophes, outbreaks of diseases like the ongoing COVID-19-pandemic, or politic interruptions. If such an event occurs in some of our destinations, there is a potential risk of significant operational disruption and costs in our businesses.

CRISES MANAGEMENT

Our company has a well-established and functional system for dealing with any crises related to our business. Key to our Crisis Management is our Duty Office setup in association with our cross functional operative management team (Silver Team). Our Duty Office is always open and triggers any event. Head of the Duty Office is also Silver Team Leader. Thus, the middle-management team takes the operative responsibility for responding to a crisis.

They find their mandate from the Gold Team, led by the Nordic Leisure Travel Group CEO, who is always informed. The Microsoft O365 collaboration platform together with our own developed CRM-system gives us the trusted IT-environment for working with this data. As an integrated part of the business, our own airline Sunclass Airlines has a default role in both Silver and Gold Teams.



Throughout recent years, we have had the luxury only to regularly exercise the scenarios of crisis with heavy impact, e.g. accidents. Even so, world-events like COVID, Ash clouds, Calima storms and military coups, really test our ability to swiftly adapt and respond to any scenario. We can honestly state that we are up to the task of always protecting and informing our customers and staff.

Nordic Leisure Travel Group Policies and Guidelines

Our sustainability and social responsibility work are governed by a number of policies and guidelines. All policies are continuously adapted to the reality in which we live and are anchored in our Group Legal unit.

CODE OF CONDUCT

The Group Code of Conduct is our main policy document, acting as an umbrella document for all other policies and guidelines. It applies to all employees and all areas of the business within the Nordic Leisure Travel Group. The policy covers our business values: our customer promises: behavior towards customers: behavior within the company: health and safety at work: media and social media use: sustainability: community engagement and volunteering; child protection: business risks: supplier relationships: bribery, gifts and entertainment: conflicts of interest and benefits: data protection and confidentiality: speaking out: competition law, trade restrictions and sanctions: information security: share dealing: fraud, theft and false accounting: and political donations and support. Within all these areas the policy sets out the standard to which all employees and the business is expected to adhere, and what process to follow if any deviation from the code is discovered.

Every employee within the Group is required by the Code of Conduct to be vigilant against breaches of the policy, and to report any deviations found either to a manager or by using the confidential trust line and speaking out functions.

GROUP SUPPLIER CODE OF ETHICS AND CONDUCT

The Supplier Code of Ethics and Conduct sets out the minimum standards of business behavior expected of Suppliers, who must have processes in place to monitor and maintain these standards, including their own supply chains. The policy applies to everyone across the Group, in whichever jurisdiction they are located: employees, managers and directors, temporary workers and all third parties associated, and doing business, with us.

Any new supplier is required to commit to the Supplier Code of Ethics and Conduct, which gives NLTG the right to audit Suppliers to ensure compliance with the Code. For any identified non-compliance with the Code or law, the Supplier must provide a corrective action plan for NLTG approval. If the non-compliance is unlawful, NLTG has the right to end any contract with the Supplier, without any financial or other liability. Suppliers must also make the NLTG Supplier Speaking Out Policy available to all their employees and contractors who provide services to NLTG or who are in contact with NLTG employees on a regular basis.

The code covers, among other things, Human Rights, Child Labor, Child Protection from sexual abuse, Forced Labor, Wage and Benefits, Fair Treatment and Equal Opportunity, Health and Safety, Anti-Bribery and Corruption, Gifts and Hospitality, Conflict of Interest, and Our Environment and The Community.



Transparency is important for us:
No cases have been reported this fiscal year.

SUSTAINABILITY POLICY

Tourism and travel affect not only the environment but also the local inhabitants at the destinations we travel to. We constantly strive to minimize the negative effects of tourism and increase the positive ones, whenever possible and anywhere we operate, while at the same time showing the highest regard for people and places.

As part of our engagement in corporate responsibility and sustainable operations, we are fully committed to comply with Human Rights and protect Children, represent and support the important cause

to protect our world, and to care for customers, employees and partners and deliver transparency and communication in all we do.

ENVIRONMENTAL POLICY

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

CHILD PROTECTION POLICY

At Nordic Leisure Travel Group, we are fully committed to respecting children’s rights as set out by the United Nations Convention on the Rights of the Child. The Child Protection policy outlines the company’s standards which are in place to safeguard children, both customers and local at destinations. The policy outlines our commitment to provide adequate training, information and support to customers and employees, reporting processes and investigation procedures to protect children from harm.



We operate a zero-tolerance policy against any form of abuse, neglect, or exploitation of children.

We condemn all forms of sexual exploitation of children and support all acts of law made to prevent and punish such crimes. NLTG demands that guests, partners and all members of staff refuse to take part in sexual exploitation of children, and that they report all cases of sexual exploitation of children of which they become aware. Breaching this policy may result in dismissal, reporting to the police and the end of ongoing collaboration.



Transparency is important for us:
Over the financial year, two cases of concern have been registered, both of which have been reported to the Swedish authorities.

Animal Welfare Policy

At Nordic Leisure Travel Group, we care about the welfare and protection of both captive and wild animals which form part of tourist attractions and which are also impacted by tourism.

No compromises can ever be made. That is why we have devised a clear policy for animal welfare. The policy is underpinned by a fundamental message:

We have zero-tolerance for exploitation of animals, and distance ourselves completely from everything that involves animals in captivity and from any other type of animal use or abuse for entertainment or commercial purposes.

In practice this means that we commit ourselves to refrain from participating in, organizing activities, or selling excursions to our customers, which includes activities where animals are either exhibited, used, or exploited for entertainment or commercial purposes. Consideration shall apply to animals in captivity of whatever form.



We operate a zero-tolerance policy against any form of exploitation of animals.



Transparency is important for us:
No animal welfare cases have been reported during the financial year.

CHARITY & SOCIAL ENGAGEMENT POLICY

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

ANTI-BRIBERY AND CORRUPTION

Our Anti-Bribery and Corruption Policy includes a list of actions and circumstances that constitute warnings for corruptions. It also clarifies our zero

tolerance with all forms of bribery and corruption, both internally and externally.

If suppliers violate our policies, we are entitled to cancel contracts immediately and without penalty.

To ensure that our policies are complied with, there is a whistleblowing function for reporting wrongdoing (illegal or unethical conduct) or malpractice. Our Supplier Speaking Out Policy specifically describes how suppliers and their employees should proceed to confidentially report violations to our established standards, such as health and safety risks, unethical behavior, suspected crime, or corruption.

 **We act with zero-tolerance against bribery or corruption in any form by any stakeholder group related to the company.**

 **Transparency is important for us:**
No cases have been reported this fiscal year.

EXTERNAL AUDITING
Travelife (Hotel Operations)

Through our collaboration with Travelife, our work on the environment and social responsibility is followed up by the independent auditors of Travelife every two years. Travelife, is a sustainability accreditation scheme, providing guidelines and measurement systems aimed at contributing to improvements in environmental and social responsibility in the travel industry.

Companies associated with Travelife must contribute to society by employing locally, using local suppliers and by marketing local business. They must also work against child labor and child sex tourism.

EU Ecolabel (Hotel Operations)

EU Ecolabel is the most stringent and reliable eco-certification currently existing for hotels. Nordic Leisure Travel Group’s own Sunwing Resorts work in accordance with the EU Ecolabel. At present no other tour operator in the Nordic countries can offer hotels with the EU Ecolabel.

EU-EED compliance (Tour Operator businesses)

The EU Energy Efficiency Directive requires all major companies in the EU to map energy consumption and set goals for optimizing energy systems going forward. The responsibility for ensuring compliance lies with the individual national authorities. The relevant entities in the Nordic Leisure Travel Group all comply with the requirements of the EU EED directive.

EU-ETS compliance (Sunclass Airlines)

The EU emissions trading system (EU ETS) is a cornerstone of the EU’s policy to combat climate change and it is a key tool for reducing greenhouse gas emissions cost-effectively. The EU ETS works on the ‘cap and trade’ principle. The system also covers reportable CO₂ emissions from the aviation sector. Nordic Leisure Travel Group operates its own airline, Sunclass Airlines, which is compliant with the ETS requirements. Since the inception of the ETS, our airline has conducted independent assessments of the fuel and emissions for each year. The next process will be completed in the spring of 2021, and the responsibility is placed with the airline’s flight operations department at the head office in Copenhagen Airport.



Environmental performance

Our environmental work focuses primarily on the environmental impact of our airline and hotels. The two areas together represent more than 95 % of the total environmental impact deriving from our business operations. Our own airline, Sunclass Airlines, operates a fleet of eight fuel efficient Airbus Single-aisle A321 and two Airbus A330 Wide-body aircraft. Due to our successful business-model, our modern and refurbished aircraft fleet manages to deliver a very high load factor resulting in industry low emissions per passenger.

In 2015, the airline received eight new Airbus A321s replacing older models, and with these new aircraft, which are much more fuel-efficient, they have contributed to further carbon reduction. Our fuel consumption is recorded and evaluated continuously by external auditing, in compliance with the EU-ETS obligations.

AIRLINE OPERATION

Sunclass Airlines was also the first airline in Europe to start with waste separation onboard in 2001. Today we sort all waste on all our flights and by this investment and initiative we have managed to reduce waste by more than 70 % since 2001.

 **70 % reduction of on-board waste over the last 20 years.**

During the last 15 years Sunclass Airlines has also been working with “green flights” procedures. This means that every part of the flight is environmentally considered and optimized wherever possible. The process is divided into several stages from route planning before start, departure, journey, approach, and landing. The benefits of “green flights” is to reduce fuel consumption and cause less noise while ensuring continuous on-board comfort for our Nordic holiday makers.

 **Sunclass Airlines:**The Covid-19 pandemic has had a considerable impact on our overall fuel consumption and emissions as this year is approximately 60 % lower than in a normal operating year. The total consumption of aviation fuel was about 73 thousand tons, which corresponds to about 230 thousand tons of CO₂ emissions.

There are currently no industry standards for how airline operators should disclose their fuel consumption and emissions. In our calculations and performance figures, we consciously choose to include all empty flights we perform, and not only flights with passengers on board. In this way, we provide a legitimate picture of our imprints and achievements.

Sunclass Airlines has more than ten years of experience with the ISO14001 management system and has been certified from 2010 to 2020. The airline maintains a focus on fuel efficiency measures, and the flight operation teams continuously assess current and new measures that can support our target to reduce fuel consumption, and thus emissions.

 **Carbon Emissions Per Passenger has decreased more than 50 % since 1990 – source: IATA.**

 **It is estimated that aviation currently accounts for 2 to 2.5 % of global CO₂ emissions. Aviation contributes to climate change – that’s a fact. However, it is often less than people think. It’s currently a relatively small chunk of global emissions compared to other industry sectors.**

RESORT & HOTEL OPERATIONS

Travelife

We work extensively with our hotel brands to enable our customers to experience local products and services, giving them an authentic taste of the local culture and helping the local economies thrive.

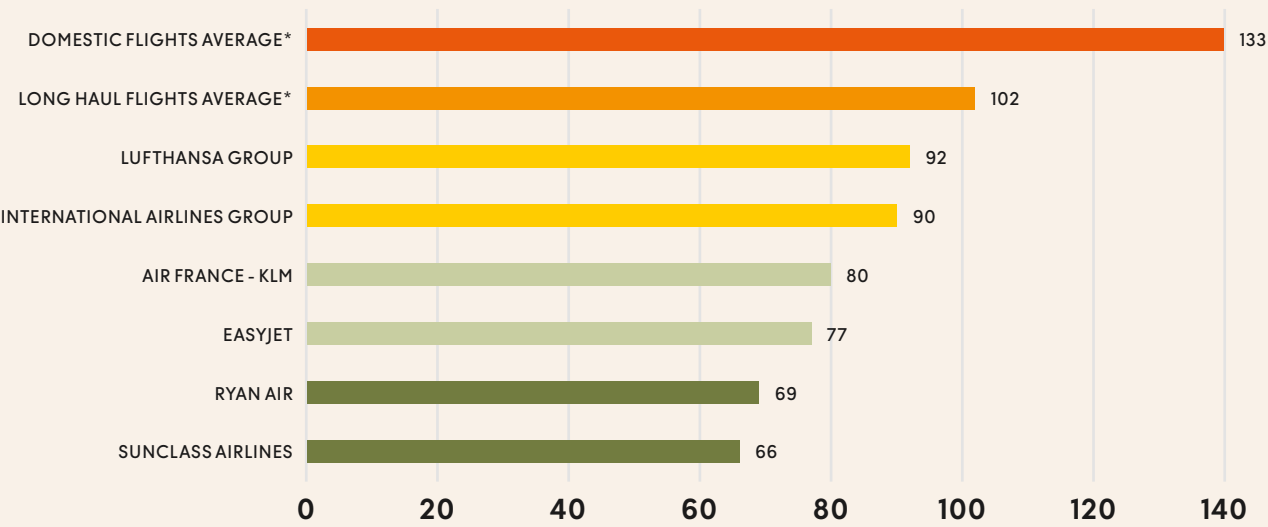
Hotels are key to sustainable destinations. They play an important role in protecting the local environment and improving the lives of local communities. Hotels must demonstrate they are managing these impacts.

By 2021 we aim to have all our own-brand hotels accredited by Travelife, the internationally recognized scheme which helps hotels and accommodations to manage and improve their social and environmental performance. This is a significant challenge. With different types of hotels in many regions of the world, influencing our partners and supply chains is not always easy and not all hotels fall under our direct control.

CO₂ emission in grams per revenue passenger kilometer 2019-2020

Our own Sunclass airlines is among the best in the industry at limiting the impact on the climate by operating with low carbon emission footprints per passenger kilometer. **Sunclass Airlines average carbon emissions in grams per passenger km: 66.**

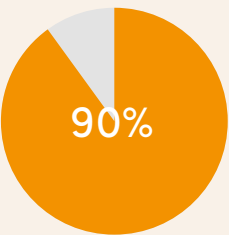
Sources: Individual airline online data, Statista, UK BEIS/Defra.
*At smaller decimals an up or down adjustment has been made to the nearest whole number.



Resort & Hotel Operations target achievements and goals:

TRAVELIFE:

Compared to last year, we have managed to increase our share of hotels in the portfolio with the highest possible performance level under the Travelife program: 90 % Gold Certified.



TARGET 2021:

100 % of hotels to be Travelife GOLD certified by the end of 2021.



EU ECO-LABEL:

At the end of this financial year, all our Sunwing resorts are fully certified in accordance with the EU Eco-label environmental program.



During the financial year, we operated 25 resorts under the following brands: Sunwing, Sunprime and Ocean Beach Club by Sunwing. All hotels are operated with strict sustainability requirements including Travelife and/or the EU Eco-label scheme. We currently also offer our NLTG customers to choose between 172 hotel accommodations with a Travelife accreditation.

Facility and inhouse operations

Our environmental work impacts all parts of our company. In our home organization and in offices across our source markets, we work towards reduc-

ing energy consumption and waste wherever we can.

Climate impact and carbon emissions

Climate change is a real and significant risk facing the people and the planet. The World Economic Forum lists climate change and extreme weather events in the top five global risks, both in terms of likelihood and severity. Travel and tourism not only contribute to climate change but will be increasingly affected by climate change, with the Intergovernmental Panel on Climate Change (IPCC) special report on the impacts of a global warming of 1.5 °C highlighting the increased risk to coastal tourism. Airlines will also

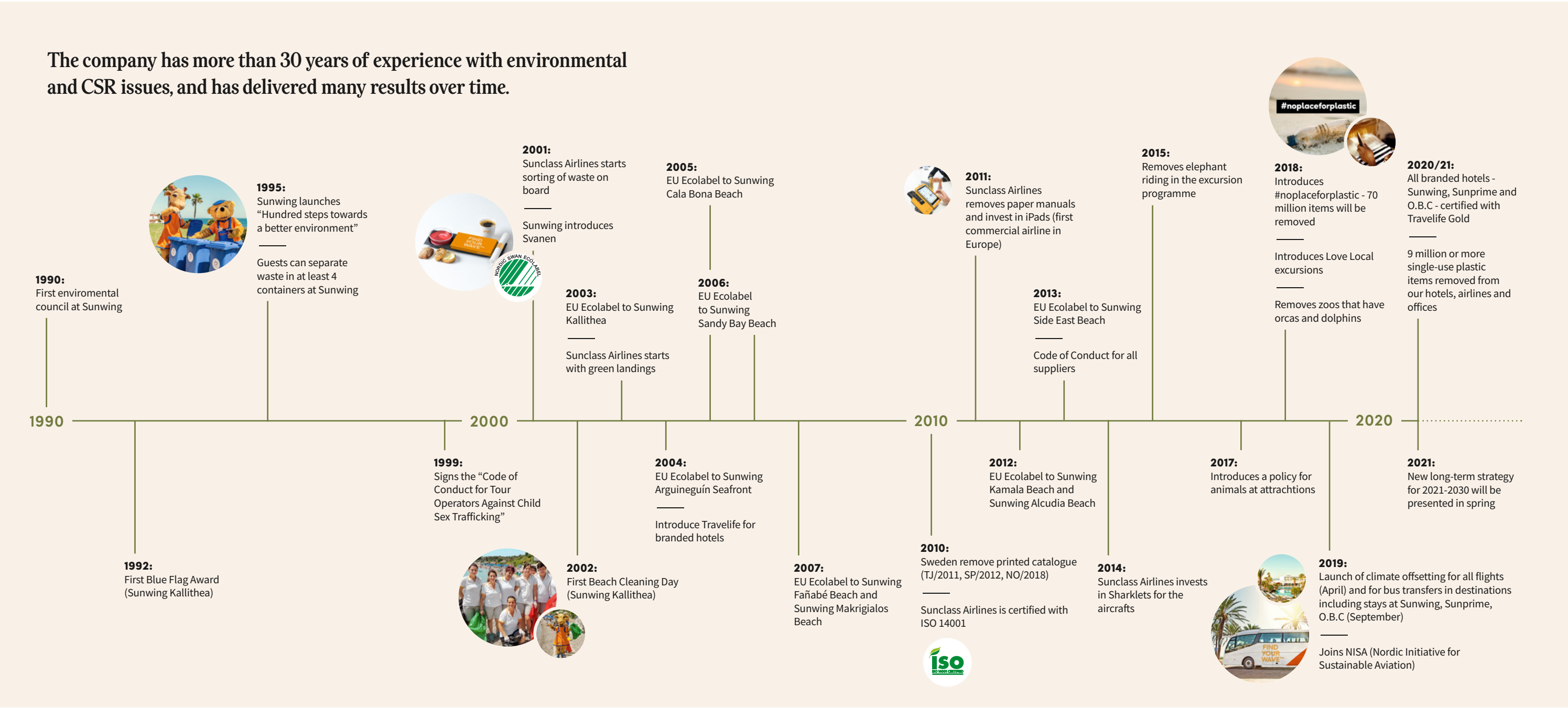
suffer negative consequences because of climate change, such as increased disruption to routes, increased turbulence, reduced aircraft performance and loss of critical infrastructure.

Air transport accounts for approximately 2.5 % of global man-made carbon emissions, according to the Air Transport Action Group (itag.org). With passenger numbers and emissions predicted to rise in the future, International Civil Aviation Organization (ICAO) has acted across the industry in the form of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). This scheme aims

to aid the air transport industry in achieving carbon neutral growth from 2020.

The risks presented by climate change directly impact our business, both now and in the future. This being the case, we take our climate change impacts seriously and are acting to improve our environmental performance and limit our impact across all areas of our business.

We recognize that the emissions, especially from flying, have a negative effect on the climate and the environment. As part of our ambition to work



towards a zero impact from our activities, we have chosen to get involved in CO₂e* offset in parallel with our work to reduce consumption. **We see it as an important contribution here and now but fully understand, that offsetting is not a long-term solution, but the best option while we wait for new aviation technologies and biofuels.**



“Carbon dioxide equivalent” or “CO₂e” is a term for describing different greenhouse gases in a common unit (Carbon dioxide, Methane, Nitrous Oxide, Hydrofluorocarbon gases, Perfluorocarbon gases and Sulphur Hexafluoride). For any quantity and type of greenhouse gas, CO₂e signifies the amount of CO₂ which would have the equivalent global warming impact. We leave calculation methodologies to our partners to ensure validity of our emissions offsets.

In 2019, the Nordic Leisure Travel Group launched the most extensive travel and airline carbon offsetting program in the industry in partnership with Natural Capital Partners (NCP). The program offset all emissions for all customers and staff on duty, regardless of airline, all hotel stays at our own hotel brands; Sunwing, O.B.C and Sunprime, as well all bus transfers to and from the airports in the destinations.



Since April 19, we’ve successfully managed to compensate the climate impact from our activities by 890,000 tons of CO₂e. The volume corresponds to the emissions from our operations commencing from the starting point in 2019 and expected until April 2021.

The initial expectations for emissions have been greatly reduced this year due to the Covid-19 pandemic situation. The CO₂e emissions from our operations are compensated through investments in different types of projects that all provide a benefit for the climate, that meet the strict requirements of the United Nations Clean Development Mechanism (CDM), are verified Carbon Standard or Gold Standard projects developed by WWF and supported by more than 80 environmental organizations. Our climate offset program is for the current period also certified against the global standard “The Carbon Neutral Protocol”, which require data to be externally audited. The program is an approval which

provides assurance of a company’s capability to be clear, measurable, and transparent in their climate work.

The NLTG offsetting accounts to more than 1.5 million travelers’ flights and 570 000 stays at our own branded hotels, Sunwing, O.B.C and Sunprime. In addition, 1.1 million customer bus transfers between airport and hotels are included.

Our investments have a positive impact in many local communities and is estimated by our partner to support more than 125 000 individuals directly.

Our 890,000 tons of CO₂e emissions are compensated through investments in the following projects:

- Wind power 244 540 tons CO₂
- Solar energy 378 460 tons CO₂
- Hydropower 133,500 tons of CO₂
- Water infrastructure 133 500 tons CO₂

Project investment areas



Windpower



Solar energy



Hydropower



Water infrastructure

In addition to the climate offsetting program we aim the internal environmental work at our own airline operations and at the activities in our own resort and hotel division.

Carbon emissions from our own airline is the single biggest environmental impact and as such we have a specific focus on the airline’s emission performance.

As support to our aim to reduce the impact across the business our internal flight operation teams continuously analyze data and always assess the possibilities for implementing energy-improving measures in all parts of the flight process from pre-flight planning, in the air, on ground and to the completion of the flights we operate. In our hotel operations, we work tirelessly to reduce the use of energy consumption and thus the carbon and other emissions. All our hotels use environmental programs as a guideline and control. Environmental objectives have been introduced for existing hotels and for future ones to be built. The overall goal is to free ourselves from climate impacts in both the construction process and operation.

Our own airline has one of the lowest CO₂ footprints in the entire European aviation industry. For this financial year the carbon emission footprint per pass.km was 66 grams.



Sunclass Airlines has delivered more than 20% reduction in direct carbon emissions over the last two decades, and 11 % alone over the last 8 years.

We follow and keep ourselves updated on relevant technological developments within the aviation industry and especially and the work of developing sustainable fuel types that can be used as an alternative to the kerosene that we use today.



As part of our aim and efforts, we support and are an active member of the organization NISA (Nordic Initiative for Sustainable Aviation) which works for sustainable aviation in the Nordic region.



Our plastic commitment

We have set a target to free ourselves completely from the use of single-use plastic in our own operations by 2025. The transformation has been underway since 2017 and has led to significant reductions in the consumption of disposable plastic across our business. We estimate that more than 9 million pcs. of single-use plastic products has been removed from our operations so far. Some of the products have been entirely removed from our supply chain. Others have been replaced with sustainable alternatives. The replacement process will continue with undiminished strength over the coming years, and with a special focus aimed at our own hotel and airline operations.

**We aim at being free from use of single use plastic by 2025.**

**9 million pcs of single-use plastic removed from our operations since 2018.**

In 2020, NLTG has taken an important step towards reducing plastic consumption and converting to sustainable materials in the food concept program on board our own airline.

Our new meal concept combines great quality food, with a sustainable and futureproof packaging. The relief on the environment is considerable and visible but will only have its full impact when the operations are back to normal after the Corona situation is over. We expect savings in disposable plastic by around a million items.

This is a great improvement of our product and the entire customer journey. Sunclass Airlines is among the first airlines to introduce this innovative and environmentally friendly meal concept.



Human Rights & Social Responsibility

NLTG recognises the UN Guiding Principles on Business and Human Rights and supports the UN Convention on Rights of the Child. We are also aligned with the UN Global Compact. These globally agreed principles and programs enable us to design and operate a structured approach to these issues across our global business.

We are determined to further reduce the risk of human rights issues in our supply chain and reviews of our Supplier Code of Ethics and Conduct and risk assessment is undergoing and will be presented during the financial year or 2020/2021.

COMMUNITY & CHARITY ENGAGEMENT

We are an important part of the communities in which we live and work. We will provide support to these communities and strive to improve the lives of those who live there through employment, supply of goods and services, and charitable support.

By supporting and engaging in social projects at home and at our destinations, we want to support the local communities, people, and surroundings we meet in our destinations.

Nordic Leisure Travel Group has a long-standing social engagement in Mexico, The Gambia and Thailand with contributions to hospitals, schools, and people in need in those communities.

Nordic Leisure Travel Group also support the nongovernmental organization ECPAT in Sweden. ECPAT collaborates with other NGO:s, authorities, and is a part of the global effort to fight commercial sexual exploitation of children. The organization was established in 1996 and is a member of ECPAT International's global network, represented in over 70 countries.

Ving Sweden is committed to My Special Day (Min Stora Day), a nongovernmental organization, granting wishes for Swedish children and teenagers 4-18 years old, with serious illnesses and diagnoses.

Our ambition is still high, and we continuously try to contribute to well-meaning projects and other good causes, within the financial framework we have available. This year has been different in many ways due to the impact on our business, and our support efforts are obviously affected by this.

Our Staff

Our aim is that it should be fun, developing and rewarding to do a good job in NLTG, and this can only be achieved by ensuring we have a truly engaged and diverse workforce. Taking care of our employees and creating the best possible conditions are a key part of our business vision, as described earlier in the report. Our views and our approach to these issues are described in our **inclusion and diversity policy**.

2020 has been a difficult year for the Group. Due to the pandemic we have had to pause our operation. Furthermore, we have had to reduce our workforce, and most of our staff have been on the different furlough schemes offered in the countries where we operate. We have made it possible for everyone that can work from home to do so and provided safe working environment for those who cannot work remotely.

We take great care to make sure our recruitment and selection process, learning and development activities and career progression opportunities do not allow for discrimination. Active recruitment ensures a variety of men and women of different ages, backgrounds, and experiences. We have a very active process of goal setting and development plans for each employee, to ensure that our business objectives and strategy are carried out at every level of the business and that employees are engaged, focused and receive training and career development. During 2020 we have paused external investments, and instead focuses on internal knowledge sharing and developing our processes.

We carry out employee pulse surveys to provide our people with the opportunity to provide feedback about how they feel about working at Nordic Leisure Travel Group. Results from the survey are shared with each team so they can build detailed action plans to ensure continuous improvement.

Our employee pulse surveys in 2020 show that 64 % of the staff feel well supported by the company, despite the difficult year for the Group. We can also see that 76 % of employees have full confidence in NLTG and in the future.

The ratio between women and men in the labor force was approx. 63 % women and 37 % men.

Figures cover Nordic staff and internal flight crew.

More information about our sustainability work and Group Annual report:

If you are interested in reading more about our business and sustainability approach, we recommend that you visit our brand websites for further updated information.

www.ving.se

www.ving.no

www.spies.dk

www.tjareborg.fi



Auditors Statement

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

ENGAGEMENT AND RESPONSIBILITY

It is the board of directors who is responsible for the statutory sustainability report for the year 2020 on page 2-31 and that it has been prepared in accordance with the Annual Accounts Act.

THE SCOPE OF THE AUDIT

Our examination has been conducted in accordance with FAR's auditing standard RevR 12 The auditor's opinion regarding the statutory sustainability report. This means that our examination of the statutory sustainability report is substantially different and less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinion.

OPINION

A statutory sustainability report has been prepared.

Stockholm the 19th of February 2021

Öhrlings PricewaterhouseCoopers AB

Bo Lagerström
Authorised Public Accountant

