

20 Sustainability 25 Report



Introduction

The mission of Stokab – to provide access to a neutral fibre-optic infrastructure contributes to the positive development of social, economic and environmental conditions across the Stockholm region.

Stokab takes a strategic and integrated approach to environmental and sustainability matters and continuously monitors and evaluates the selected sustainability areas within the environmental, social and governance (ESG) areas, as well as the associated sub-topics considered relevant to the company. In addition to these areas, Stokab pursues a structured approach to environmental and climate management, as set out in its environmental and climate plan. The plan addresses the company's environmental impact, including that arising from construction projects, transport and business travel. To manage this environmental impact, the company maintains an annual action plan setting out measures and activities to be implemented.

The EU CSRD Directive

The European Union's long-term climate strategy is to achieve climate neutrality by 2050, meaning that greenhouse gas emissions must not exceed the amount that can be absorbed by the atmosphere. One of the tools for achieving this goal is the EU's

Corporate Sustainability Reporting Directive (CSRD). It is based on the Green Deal, which outlines how we will achieve the goal of a climate-neutral EU by 2050. During 2023 and 2024, twelve standards were developed to facilitate reporting in accordance with the Directive: the ESRS¹.

In spring 2025, the EU decided to simplify reporting through the so-called Omnibus proposal. As a result, the reporting was postponed by two years. For Stadshus AB (The City of Stockholm's holding company) and the subsidiaries within the Group, the first reporting occasion will take place in 2028 for the 2027 financial year. Stokab reports its sustainability work in accordance with the requirements of the Annual Accounts Act. The reporting takes into account the forthcoming CSRD structure to some extent, although it has not yet been fully aligned with the framework.

Governance

The Board of Directors bears ultimate responsibility for the sustainability report, and the CEO is responsible for its implementation. Appointed department heads are responsible for their respective sustainability topics and develop activities for their areas, including key performance indicators and targets for the coming year, in line with the strategic work. These are reviewed and embedded within the executive management team, and the results are presented to the Board once a year in conjunction with the internal control report.

Agenda 2030

The City of Stockholm aims to be a leader in the implementation of the United Nations 2030 Agenda for Sustainable Development and its Sustainable Development Goals (SDGs). The Agenda serves as a framework supporting the City's operations in developing sustainability work at the local level. Alongside Stokab's broader positive economic impact on society and its sustainability work, the company helps support the implementation of Agenda 2030.

Sustainable procurement

For the City of Stockholm and all its operations, respecting and upholding human rights is a fundamental and ongoing commitment. For Stokab, this includes continuing to carry out supplier reviews covering environmental, social and employment-related issues, as well as corruption, bribery and human rights. Where subcontractors are used, they must be approved by Stokab before they are permitted to work on network roll-out.



THE GLOBAL GOALS

Read more about the Sustainable Development Goals
<https://globalgoals.org/goals/>

¹ ESRS – European Sustainability Reporting Standards. Ten subject-specific and two general (mandatory) standards

Sustainability chain

The table below covers all aspects of our operations throughout the sustainability chain, from extraction of raw materials, manufacturing of fibre-optic cables, and waste and recycling management. The table illustrates where in the supply chain we have the opportunity to influence our core product – leasing of fibre – and how our influence is exercised.

	Customers – set requirements/place orders/ report faults					
	1. Production chain		2. Stokab's operations			3. End-of-life handling
	Extraction/raw materials	Manufacturing	Network deployment	Delivery	Operations	End-of-life handling
Material/ activity	Fibre (glass material) Other equipment Plastic (fibre, cables, other materials)	Fibre-optic cables Patch cables ODF Ducting Access chambers Node spaces Cabinets Batteries	Planning for deployment Inventory management Implementation	Ordering Planning Installation	Monitoring Fault reporting Troubleshooting Planning Routine maintenance	Reuse Recycling Destruction Waste
Stokab's handling		Selection of products, se- lection of suppliers, agree- ments, terms and conditions, ongoing controls, monitoring and requirements setting.	Procurement, purchasing, selection of contractors and suppliers, agreements, terms and conditions, product selection, ongoing con- trols, and follow-up.			Selection of suppliers, agreements, terms and conditions, ongoing controls, and follow-up.
Party to agreement		Suppliers	Contractors/ suppliers	Contractors	Contractors	Suppliers
Impact	None	High	High	High	High	Moderate

In the production phase, the company's influence is primarily exerted through its contracted material suppliers. Through measures such as product selection, agreements, and ongoing controls, the company ensures that the material supplier monitors its subcontractors. In phase three, follow-up, the company has some influence. In most cases, the waste and how it is handled are monitored by the contracted supplier. See more information under "Waste" on the right.



→ TRANSPORT

Stokab's goal is for all transport, to and within the organization, to be powered by fossil-free fuels by 2030. This excludes transport during a heightened state of readiness.



→ WASTE

Waste is generated at every stage of the sustainability chain. From the extraction of raw materials to the decommissioning of distribution cabinets intended for customers. The waste is managed by the party responsible at the point where it is generated. Stokab's handling is shown in column 3. Contractors' own waste management practices related to the deployment of Stokab's network are reviewed and monitored.

Double materiality analysis

Inspired by CSRD and ESRS 1, Stokab carried out a double materiality analysis (DMA), which was completed in spring 2024. The purpose was to identify the sustainability issues most relevant to the company, based on impact materiality, meaning how the company affects the environment, people and society, and financial materiality, meaning how the company's financial position and future are affected.

Implementation and methodology

The analysis was based on all ESRS standards and was conducted in three steps:

- Identification of potentially relevant sustainability topics
- Internal workshops and data collection
- Assessment of impacts, risks, and opportunities (IRO) based on both materiality dimensions

A five-point scale was used to assess materiality. Topics assessed as material from either perspective (impact or financial) were also included in the subsequent work. After completion of the analysis, it was reviewed by an external auditor.

Stakeholder dialogue

To ensure relevance and legitimacy, both internal and external stakeholder perspectives were taken into account. Information and dialogue with management, employees, suppliers and owners contributed to the work. Previous materiality analyses and customer inquiries regarding sustainability were also reviewed.

Results, gap analysis and areas for improvement

The issues deemed material were climate change, working conditions and equal treatment, as well as resource flows related to products and services. See the chart for more information.

Following the materiality analysis, a GAP analysis was conducted, which identified the need to develop and report goals and key performance indicators, measures, and processes and policies.

The results will be incorporated into the company's comprehensive overall risk management, target setting, and strategic planning.

Future reporting and follow-up

The analysis is reviewed every three years or in the event of significant changes. As the Omnibus package introduces certain reporting simplifications, the review of the materiality analysis will be based on forthcoming changes to the CSRD requirements.

Identified IROs are monitored as part of internal control activities. It highlights the risks that could prevent the Group from achieving the targets set for each sustainability topic. During 2026, the objectives, activities, and IROs related to material topics will be further developed in order to be aligned with forthcoming reporting requirements ahead of the 2027 reporting year.

Group-wide work

In 2025, Stokab participated in Stadshus AB's group-wide materiality analysis. Starting in 2027, Stokab will also be included in the Group's CSRD reporting, where specific KPIs (Key Performance Indicators) will be reported.

Results of the DVA

Material topics (threshold value ≥ 3)

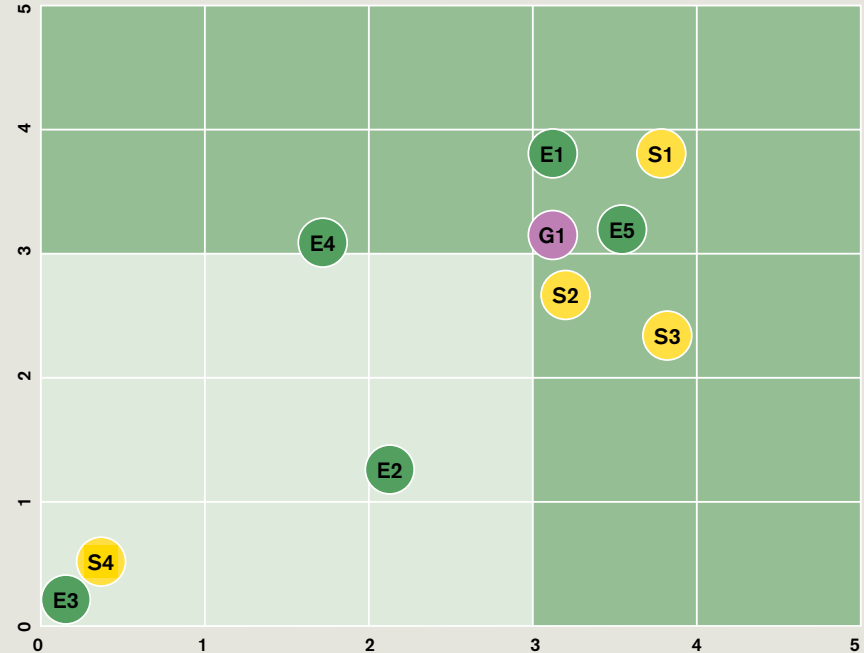
- E1. Climate change
- E4. Biodiversity and ecosystems*
- E5. Circular economy
- S1. Own workforce
- S2. Workers in the value chain
- S3. Affected communities
- G1. Responsible business conduct

Non-material topics (threshold value < 3)

- E2. Pollution **
- E3. Water and marine resources
- S4. Consumers and end users

ESG =

- E – Environment
- S – Social sustainability
- G – Governance



*E4 – the area of biodiversity and ecosystems will be further developed during 2026–2027

**E2 - Although the area of pollution was not assessed as material, waste and residual materials may generate pollution.

ESRS E1, E2, E5

Environment

Impacts, risks, and opportunities (IRO)

Stokab's operations, which include the deployment and operation of fibre infrastructure as well as the management and development of the City's communications network, have a climate impact that arises primarily in the supply chain. This impact arises from raw material extraction, manufacturing and packaging of components and network equipment (such as plastics, electronics, metals and concrete), carbon emissions from transport and construction projects, and waste management associated with construction projects.

Specific risks include increased energy consumption and overreliance on virgin materials. In addition, improper waste management in connection with network deployment, network decommissioning and IT equipment may lead to resource loss, environmental impact and increased costs.

Opportunities include improved planning and material optimisation, reduced transport through digitalisation, increased circularity through the reuse of quality-assured components and equipment, and more efficient management of excavated material in line with the City of Stockholm's environmental targets.

United Nations Sustainable Development Goals (SDGs)

On page 9, there is a description of how Stokab contributes to the SDGs.



Target 11•6



Target 12•2



Target 12•4



Target 12•5



Climate change

Fossil-free organisation by 2030

Through Stokab's neutral fibre-optic network, which enables digital services for meetings, education, healthcare visits and remote working, we contribute to reducing fossil fuel use, including by reducing transport. This supports the City of Stockholm's Environmental Programme 2030, which aims to make the City's operations fossil-free by 2030 and the entire city fossil-free and climate positive by 2040.

Stokab's Environmental and Climate Targets

Stokab has identified six environmental and climate targets to contribute to the achievement of the City's objectives and to reduce Stokab's own environmental impact. These targets are:

- Become a fossil-free organisation by 2030
- Improve energy efficiency in our operations
- Minimise the use of harmful substances
- Increase recirculation
- Ensure high resource efficiency
- Help build a smart and sustainable city

Stokab's Environmental and Climate Plan sets out each target together with a number of related sub-areas. Through a clear allocation of responsibilities within the organisation, environmental and climate targets are integrated into our operations.

Learn more at www.stokab.se/miljo_klimat (Swe)

Climate change management

Stokab has procedures in place to ensure operational reliability in existing node rooms and other technical spaces in the event of climate-related incidents. Through alarm systems that respond to events such as extreme heat or flooding, the organisation can ensure the functionality of the network nodes.

When planning network deployment, the company may need to take climate change into account, such as heavy rainfall and prolonged heat.

This will become increasingly important during project planning and excavation work, where account must be taken of previously implemented climate-related measures in the City's land, so that the land is properly restored following construction.

Energy

Improve energy efficiency

Stokab is included in the City's energy procurement scheme, which complies with the Swedish Competition Authority's procurement criteria for "Electricity from renewable energy sources – advanced level". All electricity consumption shall be from electricity generated 100% from renewable energy sources and shall also meet requirements such as the Good Environmental Choice (Bra Miljöval) standard.

Operating the fibre-optic infrastructure, including network nodes where customers host their equipment, requires energy. Due to the high utilisation of network nodes, Stokab's indirect electricity consumption is gradually increasing. However, while Stokab's electricity consumption is increasing, it can be assumed that customers' electricity consumption is decreasing, as their equipment is located in network nodes where energy use has been optimised.



Environmental pollution

Recycling waste and residual materials

As a client organisation, Stokab works with contractors and suppliers for the deployment and operation of the network. The greatest opportunity to reduce waste lies in ensuring that the correct amount of material is used, with as little waste as possible.

Waste and residual materials

Waste and residual materials arise at various stages of the production chain that Stokab relies on to deliver its fibre-optic network. To minimise waste, which can lead to increased incineration and pollution, material requirements are carefully calculated for each project. In connection with framework procurement agreements, we set requirements for our contractors' waste management in accordance with the EU waste hierarchy.

To identify and reduce environmental impact in major deployment projects, the responsible contractor is required to submit environmental and waste management plans. In planning projects where there may be an impact on biodiversity, the County Administrative Board must

be provided with certain documentation in order for the project to proceed. One of the documents that may be required for activities such as water-related operations is an environmental impact statement (EIS).

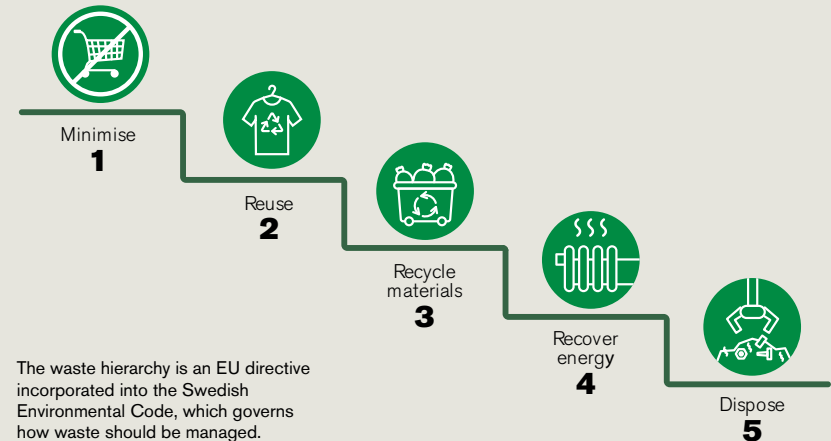
Management of excavated material

The City of Stockholm's Environmental Programme 2030 states that the management of excavated material is an important part of achieving the goal of "A resource-efficient and circular Stockholm". Stokab is involved in the City's work on the management of excavated material. By enabling efficient logistics for excavated material and construction waste, as well as the reuse of these materials, a significant number of transport movements can be avoided and the extraction of virgin materials reduced². Stokab expects to be able to increase the local reuse of excavated material where it has been confirmed that it does not contain contaminated material. In addition, there will be an opportunity to use the excavated material logistics centres established in the City.

Reuse devices

	2025	2024	2023	2022
Wall cabinet	9	11	12	9
Splice boxes	23	22	32	26
Termination boxes	6	4	18	4

² City of Stockholm's Environmental Program 2030



**Increased circularity**

Stokab's network is built from various units and components, such as ducting pipes, cables and installation materials. For a number of years now, a large number of quality-assured components have been reused in network deployment projects. This has delivered benefits for both the economy and the climate, as fewer raw materials are required for new production. Once a year, Stokab's materials team reviews the materials list to determine whether any additional components can be reused. As the network is of critical importance to society, high quality standards are required. Procedures have been established for the recycling of components that do not meet these requirements.

Material handling

Together with Stokab's employees and contractors, materials are sorted at Stokab's material storage facilities for reuse, recycling or incineration.

Materials destined for recycling and incineration are placed in containers at the storage facilities. The waste is then transported by a contracted supplier to a certified waste facility. Feedback is provided to Stokab through the contracted partner. The assessment of plastic waste, initiated in 2024, has been completed. The results form the basis for the planned initiation of recycling of Stokab's plastic waste in 2026.

IT waste from office operations

Stokab has strict requirements regarding the disposal of our IT equipment by suppliers.

This allows Stokab to ensure that the digital information stored on the devices is securely and permanently erased. The IT equipment can then be reused or recycled. In 2025, a total of 267 kilograms of IT equipment was disposed of.

Resource use and circular economy

High resource efficiency

Stokab's target of ensuring high resource efficiency addresses areas that will become increasingly important in the future, including procurement, construction processes, work planning, transport and the use of technology. For Stokab, resource efficiency means making the best possible use of the resources required for its operations, while minimising environmental and climate impact.

The contractor performs an assessment to determine the quantities of materials needed for a project. Before materials are picked from the warehouse, the quantity is reviewed by Stokab's project manager. Materials not used in the project are returned to the warehouse for reuse in other projects.

Another way to improve resource efficiency in materials management is to minimise the number of products used in the network. Through standardisation, Stokab can procure from a wider range of suppliers, which reduces the risk of insufficient availability of certain products and also simplifies procedures for reuse and recycling.

Through standardisation, Stokab can procure from a wider range of suppliers, which reduces the risk of insufficient availability of certain products and also simplifies procedures for reuse and recycling. It also enables greater flexibility, where material usage is aligned with demand and material orders can be planned well in advance. When materials are ordered for the warehouse, deliveries are consolidated wherever possible to ensure full loads, thereby reducing fossil emissions per product.

Resource efficiency also means ensuring that employees, our most important resource, are given the opportunity to better plan their work. One way to facilitate the planning and communication of installation work is through the continued development of the technician app introduced in 2025.

Through effective planning and material preparedness, Stokab can continue to fulfil its mission of providing a secure IT infrastructure.

For governing documents in this area, see page 20.



Stokab's contribution to the SDG's (Sustainable Development Goals)



11-6 Reduce the adverse per capita environmental impact of cities

The continued roll-out of the fibre network creates conditions for environmentally friendly and climate-smart solutions within the city.



12-2 sustainable management and efficient use of natural resources

All materials used in construction projects must be carefully calculated to minimise waste.



12-4 Responsible management of chemicals and waste

All products used in Stokab's network are assessed by Byggarubedömningen (BVB). Chemical products are reported in the City of Stockholm's tool, Chemsoft.



12-5 Significantly reduce the amount of waste

All materials used in construction projects must be carefully calculated to minimise waste.

ESRS S1, S2, S3

Social sustainability

Impact, risks, and opportunities (IRO)

Maintaining a good working environment and favourable working conditions remains a priority for Stokab. Deficiencies in work practices can pose risks to both mental and physical health, such as workplace injuries, burnout and dissatisfaction, which can lead to increased sickness absence.

Our employees are our most valuable asset. Increased sickness absence can affect the company's operations and lead to higher costs for sick leave and potential new recruitment. The company is experiencing a generational shift, and the skills of older employees need to be retained while new employees are recruited.

By offering a variety of health and wellness activities and regular health checkups, employees are given the opportunity to take control of their own health.

As part of the follow-up of suppliers under framework agreements, ethical requirements are monitored, including checks that suppliers' subcontractors have good working conditions and that suppliers can demonstrate relevant policies, procedures and risk assessments.

United Nations Sustainable Development Goals (SDGs)

On page 15, there is a description of how Stokab contributes to the SDGs.



Target 8•5



Target 8•8



Target 10•3



Target 9•C



Own workforce

Gender equality and diversity

A proactive approach to diversity and inclusion ensures that everyone's skills are utilised, strengthening the company's capacity for innovation and growth.

In 2025, Stokab hosted two interns from Tekniksprånget, an internship programme in which young students can try out the engineering profession over a four-month period. The aim is to encourage more people to pursue higher education in engineering and technology.

Skills development

At Stokab, we believe all employees should have the opportunity to develop their skills. Through performance reviews, conditions are created for further developing skills and performance in line with the company's objectives. The annual staff conference is an opportunity for all employees to contribute to the development of Stokab's operations. This year's conference focused on Stokab's commitment, health and preparedness.

Stokab's employees tend to remain with the company for a long time, which results in strong experience and expertise, while also leading to a gradual increase in the average age of employees. Therefore, we continue to develop our approach to skills supply to strengthen the company in meeting future requirements for new competencies.

Good working conditions promote diversity

The setting of wage rates at Stokab is individual and based on performance and skills, which are continuously monitored and evaluated. Our efforts to promote gender equality and diversity also include ensuring equitable and competitive pay. Each year, the company therefore carries out a pay survey to identify, address and prevent unjustified pay differences between women and men. The 2025 pay review identified some unjustified pay differences between women and men performing similar or the same work. These were adjusted outside the annual salary review process.

Work environment, safety, health, and well-being

Both managers and employees work to identify deficiencies in work environment, safety and health and address them in order to minimise the risk of accidents and incidents. In cases where incidents or accidents occur, these are followed up by Stokab's safety committee, which ensures that the process for investigation, risk assessment and implemented measures is followed. In the event of workplace accidents requiring rehabilitation measures, we work in cooperation with occupational health services, the Social Insurance Agency and the expertise provided through the health insurance scheme. The company has also taken out group and accident insurance for all employees. Through this, compensation may be paid if ill health remains after rehabilitation has been completed. The psychosocial work environment is crucial and is systematically monitored through employee surveys and performance reviews.

Stokab provides employees with good opportunities to identify health risks through annual health checks. To support good health in 2025, a range of services have been offered, including access to physiotherapy and naprapathy, as well as a paid wellness hour. If an employee becomes seriously ill and needs to go on long-term sick leave, additional health insurance is also in place, alongside statutory sickness benefit, the sickness benefit supplement under the collective agreement and the company's sick pay insurance.

During the year, managers' knowledge of the work environment, safety and health and systematic work practices was further developed through training in managing difficult conversations.

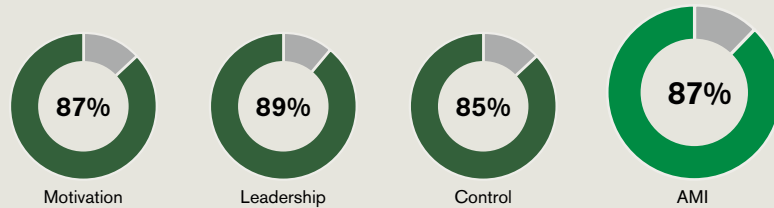
Stokab's long-term work on health and preventive wellness has contributed to continued low sickness absence. A workplace safety inspection of the office is planned for spring 2026, during which the work environment, safety and health in the office will be reviewed.

Work-life balance

For many years, Stokab has been working to promote a healthy work-life balance. Additional parental leave compensation under the collective agreement has resulted in both men and women taking longer parental leave than the statutory entitlement. By also offering employees the opportunity to work remotely a few days

a week, Stokab creates good conditions for everyone to work full time and pursue a career while their children are in preschool or school. The company's surveys on partial remote working have shown several positive effects, including reduced stress from commuting and improved work-life balance, which have enhanced employee wellbeing. The option to work remotely has also led to lower short-term absenteeism. By providing efficient digital tools, strong opportunities for career development and attractive benefits, Stokab continues to be an attractive employer.

EMPLOYEE SURVEY



The City of Stockholm's 2025 employee survey shows that 87% of Stokab's employees are motivated in their daily work and are very satisfied with their workplace. The Leadership Index reached 89%, and the total AMI* was 87%. The results of the employee survey show that employees report a high degree of participation and influence and believe that employees have equal rights and opportunities within Stokab.

*The AMI consists of nine questions that together form a composite index, as well as three sub-indices: Motivation, Leadership, and Governance.



Image: Generated using AI.

Continuous risk mitigation

Stokab is a client organisation that procures services and places orders with pre-approved partners. As a client organisation, it is essential that we are aware of our responsibility to identify and manage the risks or risk factors that arise in the work of building and maintaining a neutral and secure fibre network.

Stokab's goal is that no one is injured or exposed to risks in connection with works where Stokab acts as the client (i.e. developer).

Identification of risk factors

Stokab works together with its contractors to continuously identify and assess risk factors that may arise in connection with construction works. Certain work tasks, such as heavy lifting or work in road traffic environments, may pose risks to workers. Third parties, meaning people in the vicinity of construction works, must also be protected by ensuring the work area is properly secured and cordoned off. In 2025, a tool for reporting risks and incidents arising in the field was completed, enabling faster management of emerging risks.

Stokab tracks reported incidents and reports them at the end of the year. The company's safety committee analyses and follows up on all accidents, incidents and observations reported to the employer. When an incident or event is reported, corrective actions are taken immediately whenever possible. Safety inspections in the field are carried out on an ongoing basis, during which a number of inspection points are

reviewed. During the year, safety inspections were carried out at our warehouse and node facilities.

To minimise environmental risks, an environmental impact assessment (EIA) is carried out in connection with certain cable laying works, for example in sensitive land areas, water-related operations or coastal zones.

Clear laws and regulations

Our framework contractors must comply with applicable laws, regulations and specific provisions issued by the Swedish Work Environment Authority for the work carried out in our network. They must analyse the risks that may arise in each individual project in accordance with AFS 2023:3 (The Swedish Work Environment Authority's Code of Statutes) and document them in a work environment, safety and health plan with a risk assessment, which must be submitted to the responsible project manager prior to project start.

As the client, the responsible head of department at Stokab shares responsibility for work environment, safety and health work with the contractor (for construction and operational works) for all parties involved in the deployment and operation of Stokab's network. During the year, construction meetings were held with contractors, during which their risk management in relation to operational and construction works was highlighted.

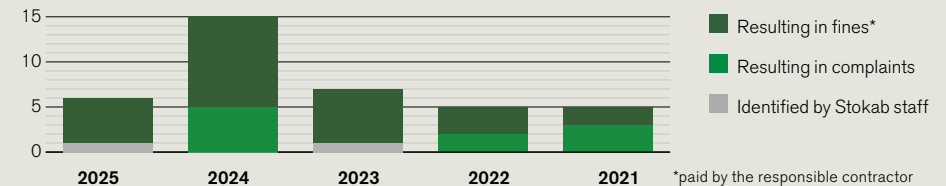
Knowledge is fundamental

All those working on our fibre network installation works must be informed, trained and have a good understanding of how to minimise, or preferably avoid, risks. Stokab requires all contracted contractors responsible for operational and fibre cable laying works in our network to have competence in BAS-U (work environment coordinator - execution) and BAS-P (work environment coordinator - planning). Good knowledge of how to manage potential or emerging risks reduces the likelihood of injury to those working in or around the network, or to others. Training is also required for the individuals at Stokab who are responsible for the work being performed. Training for Stokab employees is provided on an ongoing basis. Those requiring initial or refresher training have completed courses in BAS-U and BAS-P. Where needed, employees have also completed training in construction contract law, AMA (General Material and Work Specifications) and work environment, health and safety, among other areas.

Continued focus on work environment, safety and health

A contracted inspector has conducted inspections of ongoing construction projects during the year. During the inspection, the inspector verifies, for example, that a traffic management plan is in place, that the contractor's personnel are wearing personal protective equipment (PPE) and that signage is correct. If any issues are identified during the inspection, the responsible project manager will be notified immediately. In addition, the Technical Office from the City of Stockholm has carried out a number of unannounced inspections of ongoing projects. Incoming matters are handled by the responsible project manager at Stokab in connection with construction meetings or through direct contact with the contractor.

REPORTED INCIDENTS





Workers in the value chain

Stokab procures and places call-off orders with suppliers and contractors for construction works and network operations. This is an area where we have identified potential risks relating to human rights, labour conditions, bribery and corruption, as well as the potential environmental impacts of material production. If Stokab fails to recognise these risks and take action, confidence in us as a company could be damaged.

Responsible suppliers

As a company within the City of Stockholm, we must act in a way that ensures that customers, partners and residents have confidence in us when we carry out our assignment. This means that everyone working within and for Stokab has a particular responsibility to ensure that nothing in our own operations, or in those of contracted parties, causes, contributes to, or is linked to violations of human rights.

Procurement – A tool for social sustainability

Procurement and purchasing are important tools for increasing oversight of social responsibility among Stokab's suppliers. Stokab's framework agreement includes the appendix titled "Ethical Considerations." When new suppliers sign the agreement, they are included in Stokab's systematic monitoring and follow-up process.

In 2026, a number of procurements will be carried out in which requirements for suppliers' sustainability

work will be updated. By maintaining a strong understanding of our suppliers' and contractors' value chains, we ensure that agreed ethical requirements are met.

Monitoring and follow-up

Stokab's follow-up process includes requiring suppliers to report on their procedures for systematic work on human rights; labour rights; work environment, safety and health; the environment; and anti-corruption within their own organisation. Suppliers shall report on how they communicate and monitor their policies and frameworks throughout the supply chain to ensure decent working conditions among their subcontractors. In addition, suppliers must be able to describe how they identify any shortcomings and how they avoid, prevent, mitigate and address them. In some cases, Stokab conducts on-site visits at our suppliers' premises. During these visits, Stokab reviews how the suppliers communicate their policies to employees and subcontractors.

Any identified deviations are documented in an action plan with deadlines and division of responsibilities.

The City of Stockholm provides a whistleblowing function that can be used anonymously by employees of both suppliers and subcontractors. Incoming reports concerning the company are handled in accordance with established procedures; read more on [page 17](#).

In 2025, a new framework agreement supplier was included in Stokab's systematic monitoring and follow-up process. The supplier has provided satisfactory documentation and demonstrates a strong commitment to ethical practices. A total of around 50 suppliers have been reviewed with regard to ethical considerations since the work began in 2021.

Continued review of the supply chain

In 2026, Stokab will review framework agreement suppliers awarded in 2025 but where no call-offs have yet been made. By having our framework agreement suppliers approve and sign the "Ethical Considerations" appendix, we ensure that their oversight and monitoring of subcontractors are also subject to our requirements. This contributes to continuous improvement throughout the supply chain.

For more information about Stokab's supply chain, see the "Sustainability Chain" section on [page 3](#).

Affected communities

Stokab has connected multi-dwelling properties representing more than 90 per cent of Stockholm households to its operator-neutral fibre network, providing virtually all residents of the city with equal opportunities to benefit from digitalisation. Since 2015, commercial properties have been connected in the same way. This work will continue in 2026 as the city grows.



Stokab's contribution to the SDG's (Sustainable Development Goals)



8-5 Full and productive employment and decent work for all, including equal pay for work of equal value

All those working within and for Stokab shall have decent working conditions. Stokab monitors the social responsibility of its contracted suppliers and contractors.



8-8 Protect labour rights and promote safe and secure working environments for all workers

All those working within and for Stokab must have a good understanding of how to manage and minimise risks and prevent an unsafe and hazardous working environment.



10-3 Ensure equal rights for all and eliminate discrimination

All those working within and for Stokab are responsible for ensuring that they are not involved in or contribute to violations of human rights.



9.C Increase access to information and communications technology and universal and affordable internet access

Virtually all residents of Stockholm have equal opportunities to benefit from digitalisation.

ESRS G1

Corporate governance

Impact, risks, and opportunities (IRO)

Stokab's business model helps promote competition, diversity, innovation and choice across a wide range of digital services.

One risk is that regulatory developments could limit the company's ability to grow and continue providing a neutral fibre infrastructure. The company has identified a risk of corruption in activities such as procurement processes, the execution of contracts or call-offs under customer agreements, and the placing of orders under existing agreements. Risk analyses are conducted and incorporated into the company's internal control procedures.

Stokab's role in providing neutral fibre infrastructure creates equal opportunities for businesses and organisations to access an extensive fibre network.

Ongoing training on anti-corruption issues enhances employees' ability to identify and manage such situations should they arise.

United Nations Sustainable Development Goals (SDGs)

On page 19, there is a description of how Stokab contributes to the SDGs.



Target 8.1



Corporate governance and sustainability matters

The Board governs the company's strategic operations, including its sustainability work, when setting the direction of the operational plan and budget and in connection with the annual and sustainability report.

A stronger corporate culture through guiding principles

Our values shall guide our approach and decision-making in day-to-day operations. Through a collaborative process, the company has identified reliability, commitment and innovation as its guiding principles. Working actively with our values leads to increased pride, positive behaviours and a shared understanding of what our values mean in practice. These guiding principles serve as a compass and a tool for us as we work to strengthen our corporate culture.

Whistleblowing function

In light of the EU Whistleblower Directive, a new Swedish Whistleblowing Act was implemented on 17 December 2021: Lagen om skydd för personer som rapporterar om missförhållanden (Whistleblower Protection Act) The law provides increased protection for individuals who report misconduct that violates Swedish or EU law, and where there is a public interest in bringing other forms of misconduct – beyond financial misconduct – to light. Stokab is part of the City of Stockholm's central whistleblowing system.

The company follows an internal procedure for handling any reports received from the City's system. The whistleblowing function is the channel through which employees, or external parties who come into contact with the company, can report suspected irregularities.

Political engagement

Increased competition and greater freedom of choice

The neutral fibre infrastructure provided by Stokab on equal terms to all customers (the so-called Stokab model) creates favourable conditions for companies to establish themselves in the Stockholm region. The City of Stockholm's purpose for the company, to provide the essential digital infrastructure that enables business and public administration in Stockholm to function, means that Stokab indirectly contributes to a prosperous, innovative and sustainable Stockholm.

Smart city = sustainable city

A smart city is a sustainable city that uses digitalisation and new technology to improve life for residents, visitors and businesses. Stockholm's digital infrastructure helps create the conditions for innovative solutions, which are essential for sustainability in working life and society as a whole, while digitalisation continues to help Stockholm become a smarter, more sustainable city.

A key requirement for making Stockholm a smart and connected city is collaboration and participation. Through collaboration with the Traffic Committee and

the Environmental and Health Protection Committee, Stokab continues to support the City's efforts to position Stockholm as a smart, innovative city. One example is Hornsgatan, where digital solutions related to traffic, air quality, and noise are being tested. Stokab is also prepared to participate in the City's wider development work on innovation in urban mobility through its passive fibre infrastructure.

Studies and reports

To ensure that its operations help create the conditions for entrepreneurship and digital inclusion throughout the city, Stokab commissions studies and reports³ on a regular basis. These highlight the impacts the Stokab model has and will have on residents, businesses, and society.

One example is the 2021 report, "Neutral Fibre and the European Green Deal." The report remains relevant as it illustrates how free access to dark fibre infrastructure is essential to achieving the objectives of the European Green Deal and, in turn, the goals of the EU's Corporate Sustainability Reporting Directive (CSRD), adopted in early 2023.

The 2023 report, which highlights the importance of the business model and network design for innovation, remains relevant and has been communicated through the company's digital channels during the year.

³ Read all reports at stokab.se/reports_studies

Regulatory conditions

As Stokab is, under the Swedish Electronic Communications Act (LEK 2022), a pure wholesale operator, it is essential to continue efforts to communicate the importance of the company's business model. LEK is based on the EU Directive establishing the European Electronic Communications Code (the Code).

In 2025, the EU continued its review of how the Code has functioned and worked on a new legislative act on digital networks, the Digital Networks Act (DNA).

The proposal is expected to be presented in early 2026 and will be considered by the European Parliament and the Council of the European Union. Stokab will continue to monitor developments, as DNA and European telecommunications regulation are strategic issues for the company.

Next-generation ex ante regulation

The Swedish Post and Telecom Authority (PTS) continues its work on developing proposals for new regulation of the wholesale market for local access to infrastructure (market 1). Following a draft market analysis carried out in 2023, PTS assesses that the market can be divided into two sub-markets: one for single-family homes and one for multi-dwelling units. Stokab operates solely in the market for multi-dwelling units. PTS's view is that the market generally functions satisfactorily for end-users living in multi-dwelling units, even without regulation. For end users in single-family homes, they believe there are challenges related to competition.

PTS is expected to make a decision on next-generation ex ante regulation in 2026. For Stokab and for Swedish IT policy, this issue is strategic and will continue to be monitored.

GIA - new deployment directive

In April 2024, the European Parliament and the Council adopted a regulation on measures to reduce the costs of deploying gigabit electronic communications networks (the Gigabit Infrastructure Regulation, GIA).

As in previous deployment directives, the regulation includes an option for network owners to provide access to dark fibre instead of physical infrastructure, such as ducting. This opportunity is critically important to Stokab's business model. GIA entered into force in November 2025. The Government has presented an inquiry and proposed amendments to Swedish law, which are now out for consultation and will be further considered in 2026. Stokab will continue to monitor this work.

Supplier contact

As standard, Stokab applies 30-day payment terms from the invoice date. Alternative terms may, in exceptional cases, be agreed and must then be clearly stated at the time of ordering. Billing fees are not normally charged.

Requirements for invoice content are available on our website and are based on applicable invoicing requirements from the Swedish Tax Agency and the City of Stockholm, and are governed by supplier agreements and framework agreements.

With the support of automated reminders in the financial system, the accounting unit continuously monitors invoice processing to ensure timely payment. Payment terms and suppliers' financial status are regularly monitored to ensure long-term, sustainable supplier relationships.



Corruption and bribery

Good business ethics

Stokab's business relationships with customers, suppliers and partners should be characterized by good business ethics. By acting professionally and treating everyone equally, Stokab is able to instill confidence that it is always living up to the requirements of its stakeholders.

Risk assessment

Stokab has identified the risks of potential corruption that may arise in its business operations and could therefore damage Stokab's reputation in the market. A number of employees within the organisation handle decisions that, through external influence, may give one party an advantage over another. To reduce the risk of this happening, regular training sessions on corruption issues are conducted. This may help identify new situations where there is a risk of corruption in the organisation. A risk assessment of these is carried out and integrated into the company's internal control work.

Training on corruption issues

Since 2021, the company has conducted training sessions on anti-corruption issues for employees and consultants within the group. As part of the onboarding process for new employees and consultants, a web-based training course on business ethics and the whistleblower function is conducted. In 2025, all new employees and consultants completed the training.

The purpose of the anti-corruption training is to reduce the risk of employees being exposed to external influence and to increase awareness of how to act if such situations arise. Through regular training, it is ensured that all employees have the same level of knowledge and understanding of these issues. Next year, each department will review "dilemma cases", in which the handling of a number of situations that may arise in the organisation will be discussed.

Support in day-to-day work

To support and ensure that employees act appropriately in their interactions with partners, Stokab has an approval and delegation policy and a procurement policy. The approval and delegation policy sets out how the division of responsibilities, known as segregation of duties, is handled at Stokab. The division of responsibilities means that a single individual must not be responsible for all decisions relating to business transactions, procurement processes, or the ordering of goods and services. The City of Stockholm's guidelines on hospitality, bribery, conflicts of interest and related matters provide further support to employees in their day-to-day work. These guidelines have been developed based on the principle that everyone working for the City of Stockholm performs their duties with due care and complies with applicable laws and regulations. Through training and governing documents, issues relating to bribery and corruption are kept up to date within the organisation.

For governing documents in this area, see [page 20](#).



Stokab's contribution to the SDG's, Sustainable Development Goals



8-1 Sustainable economic growth

Ensuring the basic digital infrastructure conditions for businesses and public administration in Stockholm means that

Stokab indirectly contributes to an innovative and economically sustainable Stockholm.

Governing documents

E - Environment

Stokab's Environmental and Climate Plan 2031

Environment and Climate Action Plan 2025

Common environmental requirements for the procurement of construction contracts 2024

City of Stockholm: Stockholm Waste Management Plan 2025–2030

City of Stockholm: Environmental Programme 2030 with Appendices

S – Social sustainability

Three-Year Plan 2025–2027

Stokab: Business Plan and Budget for 2025

Stokab: Guidelines on discrimination, harassment and bullying

Stokab: Work environment, safety and health policy

City of Stockholm: Human Resources Policy

Riksdag (Swedish Parliament): The Planning and Building Act (PBL)

Swedish Work Environment Authority: Swedish Work Environment Act

Swedish Work Environment Authority: Working Hours Act with accompanying regulations

County Administrative Board: Guidelines for Risk Analysis

City of Stockholm, Technical office: Excavation and Permit Applications

City of Stockholm: Technical Manual, Traffic Management Plan

Environmental and Climate Plan

G - Governance

Stokab: Operational plan and budget 2025

Stokab: Three-Year Plan 2025–2027

EU: European Electronic Communications Code (EECC)

Riksdag (Swedish Parliament): Swedish Electronic Communications Act (LEK)

The City of Stockholm's 2025 Budget: Owner's directive

City of Stockholm: Business Policy 2020–2024

Stokab: Approval and delegation policy

Stokab: Implementation guidelines for procurement and purchasing

City of Stockholm: Anti-Discrimination Clause

City of Stockholm: Procurement programme

City of Stockholm: Guidelines on hospitality, bribery, conflicts of interest, etc.

Stokab: Ethical considerations (Appendix to Stokab's procurement documents)

City of Stockholm: Vision 2040 – Möjligheternas Stockholm (Vision 2040 – Stockholm of Opportunities)

Management of governing documents

The Board shall, in accordance with the instructions, establish objectives, policies and strategic plans that are of material importance to the company. In addition, the board shall ensure that they are updated and reviewed as necessary. The Board of Directors shall also establish guidelines and policies in accordance with decisions made by the shareholders.

All governing documents approved by the Board are communicated internally to the head or heads of department responsible for the area to which the relevant document relates. Department heads are then responsible for ensuring that the policy documents are communicated internally and implemented in the organisation. The company maintains a list of all current policy documents, categorised by area, with links to each document. The summary is available to all employees within the company.

Index

The index presents current disclosures, based in part on previous GRI reporting.
Work on aligning with the ESRS is currently underway.

Name of disclosure	Comments	Page	Deviation
GENERAL DISCLOSURES			
Governance			
Reporting on critical sustainability issues	If critical sustainability issues arise, such as urgent and significant complaints or serious incidents, they are brought to the Executive Committee by the CEO. If the matter is not urgent, it is included as a reporting item at the next scheduled Board meeting.		
The collective expertise of the highest governing body			See deviations under governance – composition and structure.
Evaluation of the performance of the highest governing body	The Board of Directors is responsible for the company's sustainability report and for ensuring that it is prepared in accordance with the Swedish Annual Accounts Act. The Board's work on sustainability is evaluated through the company's auditors' review of and comments on the sustainability report.		
Remuneration to members of the Board of Directors	Remuneration to members of the Board of Directors is determined in accordance with the levels decided by the City Council. No remuneration or bonuses are linked to sustainability.		

Index, continued 2.

	Comments	Page	Deviation
GENERAL DISCLOSURES			
Strategy, policies, and practices			
Statement on the Sustainable Development Strategy		p. 5	
Values, principles, standards, and norms regarding social, economic, and environmental sustainability	Stokab's guiding principles are: Reliability, commitment, and innovation. These principles are also published on Stokab's intranet www.stokab.se/vardegrund	pp. 14, 17	
Establishing values, principles, standards, and norms regarding social, economic, and environmental sustainability		p. 4	
Process for addressing negative impacts		p. 4	
Mechanisms for consultation and reporting of organisational affairs		p. 4	
Compliance with laws and regulations		pp. 2, 4	
Membership in associations/organisations	Svenska Stadsnätöföreningen, SSNf (The Swedish Local Fibre Alliance), Sobona – the employers' organisation for municipally owned companies, TechSverige, Byggarubedömmningen, Miljö- och klimatpakten - Stockholms stad.		
Stakeholder engagement			
Method for stakeholder engagement		p. 4	
Collective bargaining agreement	All Stokab employees are covered by collective bargaining agreements, regardless of union membership.		
Process for identifying material topics	See the results of the double materiality analysis (DMA).	p. 4	
List of material topics		p. 4	
Governance of material topics		p. 2	

E - Environment, read more on pages 5–9

DISCLOSURES

Stokab	Comments	Results for 2025	Results for 2024	Results for 2023	Results for 2022	Page reference
Governance of material topics	See page reference.			–	–	p. 2
Waste generation and significant waste-related impacts	See page reference.					pp. 3–8
Management of significant waste-related impacts	See page reference.					pp. 7–9
Types of waste and recycling methods	Total weight of non-hazardous waste.	40.4 tonnes	37.25 tonnes	41.2 tonnes	35.9 tonnes	
	Of which mixed waste converted into energy through incineration.	28 tonnes	35.3 tonnes	36.8 tonnes	31.4 tonnes	c
	Of which metal for recycling.	5.3 tonnes	1.95 tonnes	2.17 tonnes	3.0 tonnes	
	Of which sent to a landfill.	7.1 tonnes	–	2.2 tonnes	1.5 tonnes	c
	Total weight of hazardous waste.	0.487 tonnes	127 kg	125 kg		
	Of which IT equipment from office for recycling.	0.267 tonnes	0.127 tonnes	0.125 tonnes		

S - Social sustainability, Read more on pages 10–15

DISCLOSURES

Indicator	Comments	Results for 2025	Results for 2024	Results for 2023	Results for 2022	Page reference
Governance of material topics	See page reference.			—	—	p. 2
The right to take parental leave under the law (parental insurance) and collective bargaining agreements	Number of employees eligible for parental leave.	106	105	102	98	
	Number of employees who have taken parental leave.	21 people, including 9 women and 12 men	15 people, including 7 women and 8 men	13 people, including 5 women and 8 men	11 people, including 4 women and 7 men	
	Number of parents on parental leave who have returned to work after parental leave.	3	3	10	9	
	Number of employees on parental leave who returned to the same level of employment/duties.	3	3	10	9	
Model and methods for employers' work with development plans and feedback on employees' work performance	Number of employees who had performance reviews during the year.	106		102	95	
Diversity on the Board, in management, and among employees	Number of women/men on Stokab's board.*	2 women 5 men	3 women 4 men	3 women 4 men	3 women 4 men	
	Number of women/men in Stokab's management team.*	4 women 4 men	4 women 5 men	3 women 5 men	3 women 4 men	
	Number of permanent female/male employees in the Stokab Group.* Of these, 3 are part-time employees, 2 women and 1 man.	38 women 67 men	36 women 69 men	34 women 68 men	35 women 63 men	
	Number of women/men with fixed-term contracts.	—	—	—	1 woman 1 man	
	Number of female/male consultants.	8 women 15 men	6 women 11 men	6 women 17 men	7 women 10 men	

Age distribution



Board of

Directors	Women	Men
Under 30	0	0
30–50 years	0	1
Over 50	2	4
Total	2	5

Management Team

Under 30	0	0
30–50 years	1	1
Over 50	3	3
Total	4	4

Total number permanent employees

Under 30	1	0
30–50 years	13	23
Over 50	26	43
Total	40	66

*See the age distribution of board members, the management team, and permanent employees in the table on the right.

S - Social sustainability, read more on pages 10–15

DISCLOSURES

	Comments	Results for 2025	Results for 2024	Results for 2023	Results for 2022	Page reference
Governance of material topics	See page reference.					p. 2
Systematic Work Environment Management (SAM) system	See page reference.					pp. 10–11
Risk identification, risk assessment, and incident investigation	See page reference.					p. 12
Occupational health services	See page reference.					pp. 11–12
Employee participation, consultation and communication on health and safety	See page reference.					pp. 10–11
Health and safety training and education	See page reference.					pp. 10, 12–13
Promotion of employee health	See page reference.					pp. 11–12
Prevention and management of health and safety impacts in the workplace directly linked to business relationships	See page reference.					p. 13
Employees covered by the Systematic Work Environment Management (SAM) system	All employees are covered by Stokab's Systematic Work Environment Management system.					pp. 11–12

	Comments	Results for 2025	Results for 2024	Results for 2023	Results for 2022	Page reference
Governance of material topics	See page reference.					p. 2
Suppliers under framework agreements assessed for social responsibility.	One supplier with a new framework agreement was evaluated in 2025.	1	1	10	18	p. 15

G - Governance, Read more on pages 16–19

DISCLOSURES

	Comments	Results for 2025	Results for 2024	Results for 2023	Results for 2022	Page reference
Governance of material topics	See page reference.					p. 2
The organisation's significant indirect economic impacts.	The report, which highlights the importance of the business model and network design for innovation, has continued to be communicated during 2025.		–	1		p. 17
	No external benchmarking was conducted in 2025.	–	–	–	–	

	Comments	Results for 2025	Results for 2024	Results for 2023	Results for 2022	Page reference
Governance of material topics	See page reference.					p. 2
Communication and training on anti-corruption policies and procedures	All new employees and new consultants have completed the training.		9	12	–	p. 19
	No refresher training was conducted during the year.		113	26		
	Information on how to report irregularities or misconduct within Stokab's operations is available on Stokab's website. This is done through the City of Stockholm's whistleblowing function.				–	
	No additional training was provided for managers in 2025.	–	–	–	–	c
	No reports of irregularities were received in 2025.	–	–			

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Fotograf Birgersdotter
iStock
Johnér Bildbyrå AB
Måns Berg Photography AB
Petter Karlberg Media
Peter Phillips
Shutterstock
Stockholm Media Bank
Stockholm City Media Library



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