

EU Taxonomy Regulation disclosures for 2022

In this section, information is provided on how the economic activities in the EU Taxonomy apply to Thule Group's operations, including how the criteria for substantial contribution have been determined.

Description of eligible activities

Thule Group has a high ambition in terms of minimizing the environmental footprint of our products, and production processes. However, our key production processes are not listed as a key sector within the Taxonomy Compass, nor are our key activities corresponding to activities listed within NACE (Statistical classification of economic activities in the European Community).

Therefore, for our Annual Report for 2022, Thule Group has chosen to limit reporting to certain construction and renovation activities mentioned under the "Construction Sector of the Taxonomy Compass" as applicable to taxonomy reporting.

Turnover

As mentioned above, Thule Group has determined that disclosures related to the turnover KPI are not applicable.

CapEx

For calculation of CapEx, our reporting has focused on the Construction Sector in the Taxonomy Compass. Below are the relevant taxonomy activities that Thule Group has found applicable.

- 7.1 Construction of new buildings
- 7.2 Renovation of existing buildings
- 7.3 Installation, maintenance and repair of energy efficiency equipment
- 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)
- 7.6 Installation, maintenance and repair of renewable energy technologies

Thule Group has invested a total of SEK 186m in the construction of new facilities and upgrades during 2022, out of a total of SEK 610m spent on capital expenditures in production processes in 2022.

In summary, total CapEx aligned with the taxonomy amounted to SEK 123m which is 66% of construction and upgrade, and 20% of our total capital expenditures.

For calculation of the denominator related to the CapEx KPI, amounts are calculated based on accounting records, and are consistent with our accounting policies regarding CapEx (see page 89 Right-of-use assets and pages 91–92 Tangible- and Intangible assets, in Thule Group's Annual Report 2022).

Following are the main initiatives included as taxonomy aligned:

- Investments in newly constructed buildings in Poland fulfilled the taxonomy requirement that primary energy demand (PED) is 10% below the threshold value, as stated by the local authorities.
- We installed electric charging stations at our site in Hillerstorp, in Sweden, and invested SEK 7.3m on solar PV at our sites in Huta and Pila, in Poland.

OpEx

For calculation of the *denominator* related to the OpEx KPI, Thule Group used the definition of OpEx which is stated in 1.1.3.1 of Annex I in the Commission Delegated Regulation (EU) 2021/2178. For calculation of OpEx, Thule Group considered only the maintenance, and repair activities that fall under activities 7.2–7.6 in the Construction Sector of the Taxonomy Compass.

The *numerator* equals to the part of the operating expenditure included in the *denominator* of activities 7.2–7.6.

Based on our application of the guidance in 1.1.3.1 of Annex I in the Commission Delegated Act, the denominator for OpEx resulted in SEK 35m, out of which 3% is taxonomy aligned.

Proportion of Taxonomy-aligned economic activities

| Proportion of turnover from products or services associated with Taxonomy-aligned economic activities | | | | Substantial contribution criteria | | | | | | DNSH criteria (Do No Significant Harm) | | | | | | | | | | |
|--|---------|---------------------------|--------------------------------|-----------------------------------|-----------------------------------|------------------------------------|-----------------------|----------------|-------------------------------------|--|-------------------------------------|--------------------------------------|-------------------------|------------------|---------------------------------------|------------------------------|--|---|---------------------------------|--|
| Economic activities | Code(s) | Absolute turnover SEKm | Proportion of turnover % | Climate change mitigation % | Climate change adaptation % | Water and marine resources % | Circular economy % | Pollution % | Biodiversity and ecosystems % | Climate change mitigation Y/N | Climate change adaptation Y/N | Water and marine resources Y/N | Circular economy Y/N | Pollution Y/N | Biodiversity and ecosystems Y/N | Minimum safeguards Y/N | Taxonomy-align- ed proportion of turnover, year N % | Taxonomy-aligned proportion of turnover, year 2022 % | Category (enabling activity) | Category (transitional activity) |
| A. TAXONOMY ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | | |
| A.1. Environmentally sustainable activities (Taxonomy-aligned) | | | | | | | | | | | | | | | | | | | | |
| Turnover of eligible Taxonomy-aligned activities (A.1) | | | | | | | | | | | | | | | | | | | | |
| A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | | | | | | | | | | | | | | | | | | | | |
| Turnover of Taxonomy-eligible not but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2) | | | | | | | | | | | | | | | | | | | | |
| Total (A.1 + A.2) | | 0 | 0 | | | | | | | | | | | | | | 0 | 0 | | |

| B. TAXONOMY NON-ELIGIBLE ACTIVITIES | | | |
|--|--|--------|-----|
| Turnover of non-eligible activities (B) | | 10,138 | 100 |
| Total (A + B) | | 10,138 | 100 |

EU Taxonomy Regulation disclosures for 2022

Proportion of Taxonomy-aligned economic activities

| Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities | | | | Substantial contribution criteria | | | | | | DNSH criteria (Do No Significant Harm) | | | | | | | | | | |
|---|---------|------------------------|-----------------------------|-----------------------------------|-----------------------------------|------------------------------------|-----------------------|----------------|-------------------------------------|--|-------------------------------------|--------------------------------------|-------------------------|------------------|---------------------------------------|------------------------------|--|---|---------------------------------|--|
| Economic activities | Code(s) | Absolute CapEx SEKm | Proportion of CapEx % | Climate change mitigation % | Climate change adaptation % | Water and marine resources % | Circular economy % | Pollution % | Biodiversity and ecosystems % | Climate change mitigation Y/N | Climate change adaptation Y/N | Water and marine resources Y/N | Circular economy Y/N | Pollution Y/N | Biodiversity and ecosystems Y/N | Minimum safeguards Y/N | Taxonomy- aligned proportion of CapEx, year N % | Taxonomy- aligned proportion of CapEx, year 2022 % | Category (enabling activity) | Category (transitional activity) |
| A. TAXONOMY ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | | |
| A.1. Environmentally sustainable activities (Taxonomy-aligned) | | | | | | | | | | | | | | | | | | | | |
| Renovation of existing buildings | 7.1 | 110.2 | 18 | 100 | | | | | | | | | | | | | | 18 | | |
| Installation, maintenance and repair of energy efficiency equipment | 7.3 | 5.2 | 1 | 100 | | | | | | | | | | | | | | 1 | | |
| Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings | 7.4 | 0.4 | 0 | 100 | | | | | | | | | | | | | | 0 | | |
| Installation, maintenance and repair of renewable energy/technologies | 7.6 | 7.4 | 1 | 100 | | | | | | | | | | | | | | 1 | | |
| OpEx of eligible Taxonomy-aligned activities (A.1) | | 123.2 | 20 | | | | | | | | | | | | | | | 20 | | |
| A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | | | | | | | | | | | | | | | | | | | | |
| Construction of new buildings | 7.1 | 5.1 | 1 | | | | | | | | | | | | | | | | | |
| Installation, maintenance and repair of energy efficiency equipment | 7.6 | 0.9 | 0 | | | | | | | | | | | | | | | | | |
| CapEx of Taxonomy-eligible not but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2) | | 6.0 | 1 | | | | | | | | | | | | | | | 1 | | |
| Total (A.1 + A.2) | 0 | 129.2 | 21 | | | | | | | | | | | | | | | 21 | | |

| B. TAXONOMY NON-ELIGIBLE ACTIVITIES | | | |
|--|--|-----|-----|
| CapEx of non-eligible activities (B) | | 481 | 79 |
| Total (A + B) | | 610 | 100 |

EU Taxonomy Regulation disclosures for 2022

Proportion of Taxonomy-aligned economic activities

| Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities | | | | Substantial contribution criteria | | | | | | DNSH criteria (Do No Significant Harm) | | | | | | | | | | |
|---|---------|-----------------------|----------------------------|-----------------------------------|-----------------------------------|------------------------------------|-----------------------|----------------|-------------------------------------|--|-------------------------------------|--------------------------------------|-------------------------|------------------|---------------------------------------|------------------------------|---|--|---------------------------------|--|
| Economic activities | Code(s) | Absolute OpEx SEKm | Proportion of OpEx % | Climate change mitigation % | Climate change adaptation % | Water and marine resources % | Circular economy % | Pollution % | Biodiversity and ecosystems % | Climate change mitigation Y/N | Climate change adaptation Y/N | Water and marine resources Y/N | Circular economy Y/N | Pollution Y/N | Biodiversity and ecosystems Y/N | Minimum safeguards Y/N | Taxonomy- aligned proportion of OpEx, year N % | Taxonomy- aligned proportion of OpEx, year 2022 % | Category (enabling activity) | Category (transitional activity) |
| A. TAXONOMY ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | | |
| A.1. Environmentally sustainable activities (Taxonomy-aligned) | | | | | | | | | | | | | | | | | | | | |
| Renovation of existing buildings | 7.2 | 0.1 | 0.2 | 100 | | | | | | | | | | | | | | 0.2 | | |
| Installation, maintenance and repair of energy efficiency equipment | 7.3 | 0.8 | 2.2 | 100 | | | | | | | | | | | | | | 2.2 | | |
| Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings | 7.5 | 0.1 | 0.3 | 100 | | | | | | | | | | | | | | 0.3 | | |
| Installation, maintenance and repair of renewable energy/technologies | 7.6 | 0.1 | 0.4 | 100 | | | | | | | | | | | | | | 0.4 | | |
| OpEx of eligible Taxonomy-aligned activities (A.1) | | 1.1 | 3 | | | | | | | | | | | | | | | 3 | | |
| A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | | | | | | | | | | | | | | | | | | | | |
| OpEx of Taxonomy-eligible not but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2) | | 0.0 | 0 | | | | | | | | | | | | | | | 0 | | |
| Total (A.1 + A.2) | 0 | 1.1 | 3 | | | | | | | | | | | | | | | 3 | | |

| B. TAXONOMY NON-ELIGIBLE ACTIVITIES | | | |
|--|--|----|-----|
| OpEx of non-eligible activities (B) | | 34 | 97 |
| Total (A + B) | | 35 | 100 |