



**SUSTAINABILITY  
REPORT 2018**

**SATS**

**CONTENTS**

About the report	3
Strengthening our contribution to public health	3
About SATS	4
Creating and distributing value for our stakeholders	4
What is sustainability for SATS?	4
Our core mission: public health and wellbeing	5
Our employees	6
Our business ethics	7
Environment and energy efficiency	8
Our governance approach	8
GRI Index	10

## ABOUT THE REPORT

This report presents SATS' sustainability and social responsibility work from 2018. The purpose of the report is to give our stakeholders a comprehensive summary of our activities within, and approach towards, sustainability and social responsibility.

The report covers activities within our wholly owned subsidiaries in Norway, Sweden and Finland in 2018, operating through the brands SATS, ELIXIA, Fresh Fitness, HiYoga, and Metropolis.

We have prepared this report in accordance with the Global Reporting Initiative (GRI) Standards: Core option. The GRI Index at the end of the report provides an overview of disclosures according to GRI Standards, including references to where information related to each of the disclosures can be found.

The content of the report is primarily oriented around SATS' material topics: public health and wellbeing, health, safety and security, and our business ethics. In doing this, we have also taken into account what our most important stakeholders have been concerned about in our dialogue with them.

The information in this report is based on data gathered from different parts of the group and from different data sources. Although much emphasis have been placed on ensuring that the data is complete and correct, some of the information may be subject to some uncertainty.

This is the second sustainability report and reflects the increased focus on sustainability and social responsibility in our company and in society as a whole. The most recent report published prior to this was released in June 2018.

### Changes from 2017 report

Changes to this report from the previous are mainly structural with some additions and updates in the four aforementioned material sections. In short, this report features new information on our work related to public health and wellbeing in 2018, updated figures on our business and employees, new information on management systems, our whistleblowing and GDPR procedures,

as well as a new section on our work towards energy efficiency. There are no significant restatements of information since there have been no organisational changes or altered historical data presented in this report.

## STRENGTHENING OUR CONTRIBUTION TO PUBLIC HEALTH

### Our core business should contribute to bettering public health

SATS' vision is to make people healthier and happier. The core of our business is to get people to exercise more and live healthier lives. We believe that the good choices we encourage our members to make - to stay active and healthy - also benefit society as a whole.

Individual health and well-being are connected to the sustainability agenda in two ways. Lifestyle diseases, such as obesity and cardiovascular diseases, are becoming a major public health issue in the Nordic region, where we currently operate. We know that lifestyle diseases partly are caused by inactivity and unhealthy diets, and that they can be prevented by physical activity and healthy living.

At the same time, the lifestyle choices we make can contribute to a more sustainable consumption, and in turn a healthier planet. This is particularly true of global food production, which causes significant environmental challenges. Dietary choices, and the choices we make as consumers in general, can contribute positively to

both individual health and responsible production.

We aim to address these sustainability issues through our core business. We work every day to get our nearly 700,000 members off the coach to participate in some form of physical activity. By making people active we hope to contribute to their health and well-being. Given our size and scale we believe the effort we place behind each member can also contribute to improving public health. We work hard to motivate more new people to start a more active life and in 2018 the growth trend in our member base continued in the positive development.

Our members are a highly diverse group with widely different training goals. Some are old and some are young. Some want to train every day or run a marathon, others just want to do something active twice a week and stay healthy. We have the same ambition for all members - helping them succeed with their training, and train better and more regularly. We are very proud that our members completed more than 27 million training sessions in 2018.

We also have to ensure that our own operations and consumption are managed in a responsible manner. First and foremost we have a responsibility to provide fair, decent and safe working conditions for our employees and trainers. This also involves ensuring safe and clean conditions in our fitness clubs, both for the employees and members.



Secondly, we operate nearly 250 fitness clubs across the Nordics, all of which have significant energy consumption and sell food and clothing through their own retail shops. We acknowledge that we should improve our sustainability efforts throughout our operations and procurement.

In 2019, we will develop a new sustainability strategy to find ways to strengthen the contribution of our core business to public health, and to improve the sustainability performance in our own operations. We also continue our daily work to encourage our members, and help them live more active, healthy and happy lives.

### ABOUT SATS

SATS AS and its subsidiaries represent the leading training enterprise in the Nordic region with 570,000 members and 203 wholly-owned fitness clubs by the end of 2018. The business is run through wholly-owned subsidiaries in Norway, Sweden and Finland, and through subsidiaries with non-controlling interests in Norway and Sweden. The group is present in approximately 20 larger cities in these three countries.

We are the Nordic region's largest provider within the health and fitness sector and operate through our five brands SATS, ELIXIA, Fresh Fitness, HiYoga, and Metropolis. The company is ultimately owned by management, Altor, Tryghedsgruppen and Hansemgruppen. The parent company in the group is a private limited liability company registered and housed in Norway, with its headquarters in Nydalsveien 28, Oslo.

#### Supply chain management

Business relationships based on

trust and transparency are vital to our business. Our suppliers and business partners are essential to our operations, but can also expose us to reputational, operational and legal risks. We expect our suppliers and partners to comply with applicable laws, internationally recognised agreements on human and labour rights, and adhere to ethical standards which are consistent with our ethical requirements. All purchases must follow our Procurement Policy.

Our main suppliers are the service providers for each training centre and the landowners leasing rights to the premises. Additional suppliers include those that provide the fitness equipment, such as treadmills, bikes, bars and plates. We also have significant purchases through our retail shops, from a host of suppliers of clothing, food and beverages, and promotional goods. There have been no major alterations to our supply chain since the previous sustainability report.

#### Memberships, associations and external initiatives

SATS is a member of the IHRSA (International Health, Raquet & Sportsclub Association), Virke in Norway and Frisk in Sweden.

We support the United Nations Guiding Principles on Business and Human Rights and the ten principles of the United Nations Global Compact and have pledged to conduct our business in accordance with these principles.

### CREATING AND DISTRIBUTING VALUE FOR OUR STAKEHOLDERS

Good financial results are a prerequisite for a sustainable business. They are inherently necessary for attracting investors and

credit providers that can consequently help us grow and thereby accelerate our positive sustainability impact. Good financial results are also essential for retaining and recruiting the employees that our business depends on, as well as furthering the relationship we have with our suppliers and business partners. Our value creation also forms the basis for our contribution to society in the form of taxes, fees, and economic activity.

### WHAT IS SUSTAINABILITY FOR SATS?

Sustainability is a term with a broad scope, which is why the global challenges and corresponding Sustainable Development Goals (SDGs) defined by the UN are helpful to prioritise our sustainability impact and efforts. We have identified SDG 3 "Good health and wellbeing" as the most relevant to our business. As the largest health and fitness service provider in the Nordic region, we have the opportunity to make a real contribution to improving public health. In particular, we believe that our core business of helping people live healthier and more active lives can contribute to reducing lifestyle diseases in the markets in which we operate. Ultimately, we believe our encouragement of healthy lifestyle choices can contribute to improving the planet's health as well, by promoting sustainable consumption.

In 2017, we conducted a materiality assessment based on the GRI Standards and the 17 SDGs, where we identified the key topics that were deemed the most important for our sustainability work and reporting. The assessment included a workshop and input from several functions within our organisation, as well as key stakeholders.

### Direct economic value generated and distributed

	Norway	Sweden	Finland	Total
<i>MNOK</i>				
Revenue	1,718,951	1,225,403	314,784	3,259,139
Operating costs	817,809	498,186	187,825	1,503,820
Employee wages and benefits	638,893	473,534	111,568	1,223,995
Payments to providers of capital	65,304	0	-	65,304
Payments to government	2,827	17,999	17	20,843



### Stakeholder engagement

Our key stakeholders are our owners, employees and all our members. These were identified during the materiality assessment in 2017. Other stakeholders include landlords and suppliers, media, authorities and research communities within health and well-being, and more. We aim to have an open and honest dialogue and interaction with our stakeholders. This could be through day-to-day interactions, customer surveys, employee surveys, social media, etc.

Based on input from this assessment, and an update in relation to this sustainability report, we have chosen to report on the following key topics:

- Public health and wellbeing
- Health, safety and security
- Business ethics and anti-corruption

In the following sections, we discuss each of these three areas in relation to our work in 2018. Although these material topics have guided much of our sustainability approach in 2018, they are by no means static or exclusive. 2018 also saw various sustainability initiatives that fall outside the scope of these three areas but will be reported on in subsequent sections.

In 2019, we will develop a new sustainability strategy. The material sustainability topics will be revised as part of this process. In all we do, we aim to follow the precautionary principle approach to prevent possible harm to human health and the environment from our activities.

### OUR CORE MISSION: PUBLIC HEALTH AND WELLBEING

Public health issues are often context specific. Economic affluence for example does not mean there are not serious public health challenges in the Nordic region. Our business is guided by our vision “making people healthier and happier.” This means that we develop a portfolio of training products and services that suit people from all walks of life, and contribute to the relevant aspects of living a healthy life. It also means that our products and programs are based on scientific evidence in terms of generating health benefits and minimizing risk of injury.

At the end of 2018, we had 570,000 members. Our main competitor is the couch, and our first priority is to encourage our members to stay active. We are continuously working on new products and concepts to reach out to all our members, not only the active ones.

The SATS Corporate department also work to develop new services targeting inactivity through employers. During 2018 SATS Corporate successfully launched a Corporate Online Training service that targets inactive employees in the Nordic business market. The service is offered to all company employees, whether they are SATS members or not. 40 companies have already signed up to the service.

We are generally committed to contributing to improving public health beyond the products and services that impact our members. This work

is generally grouped into health awareness campaigns, research and development, and leveraging our influence for political engagement.

Through the 2019 sustainability strategy process, we will consider ways to increase its positive impact on public health, both through helping our members and reaching new groups that might not consider, or have the opportunity, to join a gym or organized physical activity. SATS Sweden is already involved in such outreach projects through its cooperation with the NGO Mentor. Mentor works to give at-risk youth some extra support from an adult mentor that can help them believe in their own future and refrain from drugs and violence. SATS Sweden provides Mentor with an arena where the mentor pairs can hang out together and exercise for free. All mentor pairs in Stockholm, Gothenburg and Malmö can get free passes to SATS throughout the year. In addition, we help the NGO recruit new mentor through advertisement in our centres.

### Health awareness

In 2018, our work on health awareness focused on cancer awareness campaigns and anti-doping initiatives. Multiple studies have shown that regular physical activity greatly reduces the risk of cancer. For this reason, we teamed up with the Norwegian and Swedish Cancer Societies to support their breast cancer awareness campaign in October entitled Pink Ribbon. We offered free online training courses for the entire month of October available to everyone - even those who are not members of SATS. The aim was to increase the campaign's reach as much as possible, allowing people to participate from home or while travelling. Additionally, as part of a social media campaign we donated 5 SEK for every video posted with the hashtag #SATSAgainstCancer showing participants completing the squat challenge as well as 5 SEK for every member participating in the Body of Life class.

Our work towards public health is not only focused on physical activity, but also healthy lifestyle choices. In this regard, all our subsidiaries across the Nordic region participated in our 2018 anti-doping initiative in collaboration with the Anti-Doping Foundation's Pure for Sure Academy. Performance-enhancing doping is highly prevalent

across the Nordic region. This doping is not only intentional but can also be accidental through dietary supplements containing classified substances. This is therefore an educational problem, prompting our work with Professor Arne Ljungqvist and the aforementioned foundation in launching a digital learning platform aimed at educating staff, members, and communities as a whole.

### Research and development

SATS contribute to obtaining deeper knowledge of public health together with the Swedish School of Sport and Health Science. This research is part of a large multi-year project co-produced by SATS and other sponsors who wish to contribute to healthier work environments. The study is primarily investigating the impact of physical fitness on cognitive abilities associated to the workplace. A recently completed study featured a total of 336 participants and is one of the first to show that physical fitness is positively related to cognitive abilities such as long-term memory up to a certain threshold. The study now seeks to investigate whether support for more physical activity rather than sedentarism impacts the same cognitive abilities. We will continue to support the research project with the hope that it can be harnessed to promote better workplace health.

### Learnster - the SATS online learning platform

The Learnster employee development platform is offered to all of our employees. It offers a range of key online courses, from the "Welcome on board" on-boarding program for new employees, to various kinds of safety trainings. The platform also supports the SATS Academy's courses, which consists of around 700 classroom training sessions in leadership, safety, products, services and sales across the Nordics. Learnster is part of SATS' ongoing efforts to professionalize and systemize internal processes for the benefit of our employees, as well as our members.



### Political engagement

In 2019, the Norwegian parliament adopted a new law that increases taxes for companies that partner with gyms and physical training centres to offer their employees discounted prices. We in SATS believe such a law will be detrimental to physical activity in the population, and therefore participated in the public and political debate against the bill. Despite the law being passed, we will continue our political engagement. In 2018 we also actively promoted public health initiatives through the industry associations Virke Trening (Norway) and Friskvårdsföretagen (Sweden). We endorse the assertion from the World Health Organisation (WHO) that countries need to prioritise physical activity through political measures that incentivise healthy lifestyles.

### OUR EMPLOYEES

The total number of employees in the group is above 10,000. Our employees are our main representatives since they meet and engage with our members and stakeholders. Therefore, having a trusting and cooperative relationship with our employees is key to our success.

Recently, we have focused on developing our employees. Each SATS company has established a process for performance evaluation including dialogues regarding employee development. In general, we work constantly to ensure that our personal trainers have been trained and educated to offer a professionalised experience.

In order to retain the best employees and keep them happy in their jobs, SATS have to be a fair and professional employer. In Finland, for example, we have worked to professionalise HR processes over the last couple of years. In 2018, we have focused on improving internal processes related to recruitment, introduction of new employees, and guidelines for our managers, all of which have been long overdue. Our members can be sure that we operate our clubs properly, and that we treat everyone who works there fairly and with respect. In Sweden, all our employees are covered by a collective bargaining agreement. None of the other countries we operate in have this agreement for all their employees.

Every employee is an important member of the SATS family, and we value diversity. We are committed to providing a workplace recognized for its equality and diversity, and we will treat everyone with fairness, respect and dignity. We do not tolerate any discrimination towards colleagues or others affected by our operations. Discrimination includes all unequal treatment, exclusion or preference based on race, gender, age, disability, sexual orientation, religion, political views, national or ethnic origin or any other characteristic that results in compromising the principle of equality. We do not tolerate any verbal or physical conduct which harasses others, disrupts others' work performance or creates a hostile work environment. No incidents of discrimination were reported in 2018 in Norway, Sweden or Finland, and there

were no fines or other sanctions raised against SATS related to discrimination issues during 2018.

### Health, safety and security

Our health and safety (H&S) vision is zero harm. We are committed to providing a safe and secure environment for all personnel throughout our facilities and job sites. Safety and security in this context means the prevention of all accidents and incidents related to people, environment and assets. We are continuously working on improving and enhancing our efforts on safety and security.

Formal fora for cooperation between management and employees are established in each country aligned with national legislation. This includes formal elections of safety representatives as well as formal and informal cooperation in a working environment committee featuring an equal number of representatives from management and employees. These committees hold meetings at least four times a year.

H&S incidents are recorded and managed within each SATS company in different systems aligned with national legislation for incident reporting and management. In Norway, a total of 3 injuries were registered in 2018. In Sweden 20 injuries were reported, and in Finland 22 injuries

were reported in 2018. Typically, the injuries within the company are achilles tendon, sprain, strain, and ailments. No work-related fatalities were recorded in 2018. There were no fatalities reported for members visiting our training centres in 2018, but 6 serious incidents were registered. In Norway, one member suffered from cardiac arrest, but survived due to a swift and competent reaction from one of our employees. In Sweden, there were four cases of cardiac arrest without fatalities. Finland saw a fire in one of the training centres, but no one was hurt or in immediate danger thanks to the swift reaction from staff. Sick leave among our employees was 4.4 % in Norway, 5.1 % in Sweden and 10.7 % in Finland.

### OUR BUSINESS ETHICS

#### Anti-corruption

Even though the Nordic countries are among the highest rated on Transparency International's Corruption Index, anti-corruption is still a very important topic for SATS. Corruption undermines legitimate business activities, distorts competition, ruins reputations and exposes companies and individuals to severe risk. We have zero tolerance for corruption in any form, including bribery, facilitation payments and trading in influence. We will comply with all applicable anti-corruption

laws and regulations and take active steps to ensure that corruption does not occur in relation to our business activities.

Transparency is vital in the combat of corruption. We are committed to conducting our business activities in an open and transparent manner, promoting transparency in our industry and consequently support efforts to combat corruption worldwide.

Business ethics also include avoiding conflicts of interest, money laundering, unfair competition and breaching rules related to gifts and hospitality. Our Code of Conduct covers all these issues and guide our management and employees on how to operate responsibly. Information and training on the Code is also executed as part of its use.

No instances of corruption or other breaches of ethical conduct related to SATS have been reported in 2018.

#### Whistleblowing

Although we classify anti-corruption risks and impacts on our activities and value chain as relatively low, important considerations and measures are still made. One such measure is our approach towards whistleblowing. In 2018 we continued to use the services provided by our Swedish partner to run our Compliance Hotline. This service is available at all times and provides

### Key H&S figures for 2018

	Norway <sup>1)</sup>	Sweden	Finland	Total <sup>1)</sup>
<b>Employment</b>				
Number of employees	5,433	3,256	1,095	9,784
Of which are on permanent contracts	90%	51%	98%	-
Of which are on temporary contracts	2%	-	2%	-
Of which are on fixed paid contracts	9%	12%	13%	10%
Of which are on hourly paid contracts	91%	88%	87%	90%
<b>Diversity</b>				
Percentage of women, total	73%	70%	83%	73%
Percentage of women among leaders <sup>2)</sup>	63%	63%	68%	64%
Percentage of women, Nordic Group Management	-	-	-	40%
Percentage of women, Board of Directors	-	-	-	17%
<b>Equal salary</b>				
Ratio of salary for women to men, fixed paid contracts	0.85	0.89	0.75	-
Ratio of salary for women to men, hourly paid contracts	1	1	0.96	-

<sup>1)</sup> Not including Fresh Fitness, with about 481 employees and 82 full-time equivalents.

<sup>2)</sup> Defined as persons having personnel responsibility.

employees with the medium to report any instances toll-free over the phone or through a web submission portal. The system is now fully launched in all four Nordic countries and is also available through our SharePoint solution.

### Human rights

In general, human rights, risks and impacts are regarded limited for our own operations. The risk might be somewhat higher in our supply chain, especially related to possible production in geographies where the risk of human rights violations is normally higher than in the Nordic region. We are committed to respecting all internationally recognized human rights and will conduct our business consistently with the United Nations Guiding Principles on Business and Human Rights and the ten principles of the United Nations Global Compact. We will avoid infringing on human rights of others and aim to appropriately address adverse human rights impacts with which we are involved.

This means that we respect the human rights of people in communities impacted by our activities and that we oppose all forms of human trafficking, forced labour, and illicit forms of child labour in our operations or value chain.

We also support all international labour and human rights articles that are set out in the UN's Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the OECD Guidelines for Multinational Enterprises and the ILO Core Conventions (International Labour Organisation), including the freedom of associations and collective bargaining principle.



### ENVIRONMENT AND ENERGY EFFICIENCY

While not being defined as a material sustainability topic in the 2017 materiality assessment, environmental impact is on SATS' sustainability agenda. We are committed to preventing harm to the environment and aim for outstanding natural resource efficiency in our business activities. We actively work to limit greenhouse gas emissions from our activities and will comply with all applicable environmental laws and regulations.

Our main environmental footprint is related to energy consumption and waste management at our offices and fitness clubs. This is managed by each of our companies in the Nordic countries and at each individual fitness club, aligned with national legislation and local practices normally established by our landlords. Indirectly, our business travels and our purchasing of equipment and services also have an impact on the

environment. This is an area we are committed to improving throughout the coming years.

We focus on energy efficiency in all markets, although we still have much unrealized potential. In Norway for example, we have installed energy WEB, which increases the speed of the automatic reaction to high energy consumption or ventilation. We also have power meters that reports on consumption. SATS Norway has also began installing a control system called "the Data Janitor" that optimizes the energy use on ventilation and has reduced the energy consumption by 25-28 % in the relevant training centres. All centres also have sensors in the showers that automatically turn off the water after 1-2 minutes.

As previously mentioned, we have significant potential to improve our environmental impact, both in our clubs and through purchasing. We will look for ways to develop, and possibly expand, our work to improve SATS' energy efficiency and environmental impact in 2019 through our sustainability strategy process.



### OUR GOVERNANCE APPROACH

Our governance structure for sustainability is integrated into SATS' overarching governance structure. The CEO is responsible for the company's business development, and leads and coordinates the day-to-day operations in accordance with the Board of Directors' instructions for the CEO and other decisions made by the Board.



An internal Sustainability Committee has been established to oversee the implementation of the overall Sustainability Program. Sustainability-related efforts handled in this program are focused around potential risks and areas where we as a company may contribute positively.

In 2018, the group underwent a comprehensive process to rationalize and professionalize group policies, guidelines and routines. This upgrading of our management systems will make it easier to follow up on the operations of each centre, detect and report on deviations, and in turn ensure the safety and wellbeing of our members and employees.

#### **Code of conduct**

In 2018 we finalized a revision of our Code of Conduct to provide guidance on our framework of policies and instructions. It now helps to create a "SATS way of doing business" by defining a common ethical compass, setting clear standards and expectations on how to act and help while recognizing that doing business with integrity is a shared responsibility. The Code applies to all our employees, hired contractors and board members, and will be available in local languages in a printed format document and on our Intranet pages. It will cover issues like business ethics and anti-corruption, human rights and labour rights, health and safety, environment, as well as privacy and data protection.

#### **Group policies and handbook**

Several group policies and handbooks have or are being developed, including



the Employee Handbook, HSE Handbook, Harassment policy, GDPR policy, and more. In addition, each company within SATS has established relevant sustainability management systems and processes, e.g. on human resources and HSE, according to national legislation and practice.

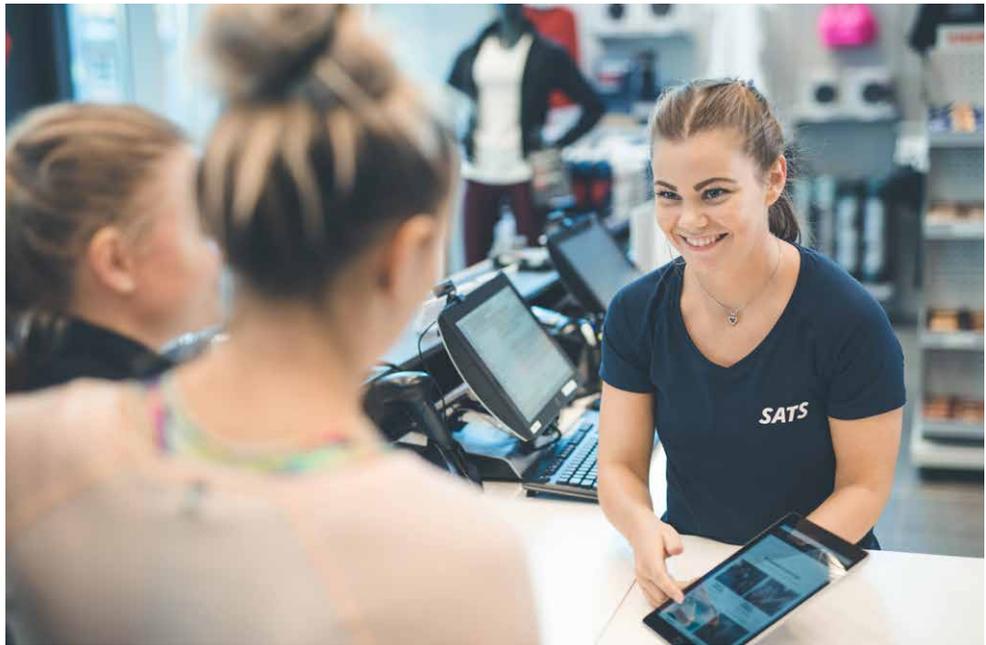
At the end of 2018 and in the start of 2019, SATS has launched a new platform to gather and share all the relevant handbooks, routines, processes and policies in one place that is similar in all countries – SharePoint. This is where all our employees will find everything they need on a daily basis, simultaneously making it easier for management to update routines and guidelines.

During the fall of 2018 SATS revised all the routines for handling an unwanted crisis or emergency. All updated routines are being launched in the beginning of 2019 together with our new SharePoint solution. This means

that we now have similar routines from club to country management and all the way up the Nordic management in all countries. All these routines are documented in our contingency plan for each country in local languages. We also have two partners when it comes to contingency agreement, Semac NO, FI, DK and 2Secure SE. Our new crisis and emergency routine defines a clear goal and approach for all operations dealing with these situations. In the event of a crisis, SATS should always first focus on the people, then on environmental impacts and ultimately on the material and any financial damages, including brand and reputation.

#### **Deviation reporting**

At the beginning of 2019 we are planning the launch of a deviation reporting system together with Agrippa solutions. This system will be launched in May 2019 for Norway, Finland and Denmark. SATS Sweden continues their deviation reporting in cooperation



with AFA Försäkring. This means that all the countries now have a fully operational system to report unwanted issues.

**Privacy and data protection**

Privacy and data protection laws protect the integrity and confidentiality of a person’s private information. We are committed to protecting the privacy rights of our employees and everyone with whom we do business, including our customers. We will only use personal data for appropriate purposes, and personal data will be processed in accordance with binding rules for processing of personal data.

The General Data Protection Regulation (GDPR) imposes new strict requirements on SATS as a group, and grants individuals new rights in connection with the collection, use and storage of personal information. In accordance with this, our members have the right to (i) be forgotten, which entails the right to have their personal data removed from our database (as well as the databases of all third parties that have received the personal data from us); (ii) modify their collected personal data; (iii) restrict the use of their collected personal data; and (iv) “data portability,” which entails the right to request that personal

data be provided to the individual in a machine-readable, usable format.

The requirements set out under EU GDPR went into effect 25th May 2018. After completing a three-phased project in 2017 to prepare for this new regulation, SATS was prepared to effectively comply based on a three-pronged approach:

1. **Document:** We have mapped our current member and employee data in all applicable systems, including thorough reviews of existing contracts/policies/routines.
2. **Define:** We have defined new routines for handling personal data, issued a new Privacy Policy and consent form, adjusted our Terms and Conditions and collected Data Processing Agreements from all relevant partners.
3. **Implement:** We have established new routines for customer service and operations, including system support to ensure compliance.

There have been no substantiated complaints received concerning breaches of customer privacy nor any identified leak, loss or theft of customer data in 2018.

**GRI INDEX**

This GRI Index refers to where information about each GRI disclosure can be found in the SATS Sustainability Report 2018, regardless of whether they are fully or partly reported relative to GRI.

The GRI Standards is the leading global initiative for voluntary reporting of sustainable development.

It describes reporting principles for defining report content and reporting quality and it provides guidance on the process for defining material sustainability issues for the company. The standards also include a set of general disclosures as well as subject specific disclosures within financial, environmental and social dimensions.

GRI applies a classification into two levels, Core or Comprehensive, to show to which extent a company uses GRI’s definitions and disclosure requirements.

More information about GRI can be found at [www.globalreporting.org](http://www.globalreporting.org)

## GENERAL DISCLOSURES

Disclosure #	Disclosure name	Reference and/or response
<b>Organisational Profile</b>		
102-1	Name of the organization	SATS AS
102-2	Activities, brands, products, and services	About SATS
102-3	Location of headquarters	Oslo, Norway
102-4	Location of operations	About SATS
102-5	Ownership and legal form	About SATS
102-6	Markets served	About SATS
102-7	Scale of the organization	About SATS
102-8	Information on employees and other workers	Our employees
102-9	Supply chain	About SATS (Supply chain management)
102-10	Significant changes to the organization and its supply chain	About SATS (Supply chain management)
102-11	Precautionary Principle or approach	What is Sustainability for SATS?, Environment and energy efficiency
102-12	External initiatives	About SATS (Memberships, associations and external Initiatives)
102-13	Membership of associations	About SATS (Memberships, associations and external Initiatives)
<b>Strategy</b>		
102-14	Statement from senior decision-maker	Strengthening our contribution to public health
<b>Ethics and Integrity</b>		
102-16	Values, principles, standards, and norms of behaviour	What is sustainability for SATS?
<b>Governance</b>		
102-18	Governance structure	Our governance approach
<b>Stakeholder Engagement</b>		
102-40	List of stakeholder groups	What is sustainability for SATS? (Stakeholder engagement)
102-41	Collective bargaining agreements	Our Employees
102-42	Identifying and selecting stakeholders	What is sustainability for SATS? (Stakeholder engagement)
102-43	Approach to stakeholder engagement	What is Sustainability for SATS? (Stakeholder Engagement)
102-44	Key topics and concerns raised	What is sustainability for SATS?
<b>Reporting Practice</b>		
102-45	Entities included in the consolidated financial statements	About the report, About SATS
102-46	Defining report content and topic Boundaries	About the report, What is sustainability for SATS?
102-47	List of material topics	What is sustainability for SATS?
102-48	Restatements of information	About the report
102-49	Changes in reporting	About the report
102-50	Reporting period	2018
102-51	Date of most recent report	About the report
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	sustainability@sats.com
102-54	Claims of reporting in accordance with the GRI Standards	About the report, GRI Index
102-55	GRI content index	GRI Index
102-56	External assurance	External assurance not practiced for sustainability report

## SPECIFIC STANDARD DISCLOSURE

Disclosure #	Disclosure name	Reference and/or response
<b>Main Category: ECONOMIC</b>		
103 1-3	Management approach for economic standards and disclosures	Strengthening our contribution to public health, About the report, About SATS, What is sustainability for SATS?, Our governance approach
<b>GRI Standard: Economic Performance</b>		
201-1	Direct economic value generated and distributed	
	About SATS, creating and distributing value for our stakeholders	
<b>GRI Standard: Anti-corruption</b>		
205-2	Communication and training about anti-corruption policies and procedures	Our business ethics (Anti-corruption)
205-3	Confirmed incidents of corruption and actions taken	Our business ethics (Anti-corruption)
<b>Main Category: SOCIAL</b>		
103 1-3	Management approach for social standards and disclosures	Strengthening our contribution to public health, About the report, About SATS, What is sustainability for SATS?, Our governance approach
<b>GRI Standard: Labour/Management Relations</b>		
402-1	Minimum notice periods regarding operational changes	According to national laws and regulations in each country where we operate
<b>GRI Standard: Occupational Health &amp; Safety</b>		
403-1	Workers representation in formal joint management-worker health and safety committees	Our employees
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Our employees (Health, safety and security)
<b>GRI Standard: Training and Education</b>		
404-1	Percentage of employees receiving regular performance and career development reviews	Our employees
<b>GRI Standard: Diversity and Equal Opportunity</b>		
405-1	Diversity and governance bodies and employees	Our employees
<b>GRI Standard: Non-discrimination</b>		
406-1	Incidents of discrimination and corrective actions taken	Our employees
<b>GRI Standard: Customer Health &amp; Safety</b>		
416-1	Assessment of the health and safety impacts of product and service categories	Our employees (Health, safety and security)
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Our employees (Health, safety and security)
<b>GRI Standard: Customer Privacy</b>		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Our governance approach (Privacy and data protection)
<b>GRI Standard: Socioeconomic Compliance</b>		
419-1	Non-compliance with laws and regulations in the social and economic area	No incidents reported in 2018

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