

# Sustainability Statement

How we turn values into action

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## A starting point

This statement is our starting point. It gives an honest view of how TMC is approaching sustainability today, what we already have in place and where we still have work to do. It brings together our main themes, first steps and priorities for the years ahead. It is not yet a fully CSRD-compliant sustainability report, but it does show the direction we are taking and the foundations we are building on.

**TMC** **PEOPLE  
DRIVE  
TECHNOLOGY**

# We are the global home of employeneurs

Since 2000, we have built more than a company. We have built a place where engineers, scientists and digital experts can grow, contribute and do their best work. From the start, our ambition has been clear: to create an environment where technical talent feels trusted, gets the freedom to take initiative and is encouraged to think and act like an entrepreneur. That idea still defines TMC today.

We believe meaningful innovation does not grow out of short-term thinking or tight control. It grows when people get the space to take ownership, build strong relationships and keep developing. That belief shaped our employeneurship model and remains the foundation of who we are.

Employeneurship combines the security of a permanent contract with the freedom to innovate, learn and grow. It gives our people stability as well as the room to shape their own careers and make a real difference. That combination is what sets TMC apart.

Through this model, our employeneurs create solutions that help clients move forward,

contribute to society and support a more sustainable future. And as TMC continues to grow around the world, our responsibility grows with it.

Over the past year, we have taken an important step forward through our double materiality process. This helped us look more closely at the sustainability topics that matter most to our business, our people and our stakeholders. We did not approach this as a reporting exercise alone, but as a chance to reflect, make sharper choices and define more clearly where we want to go. It also helped us strengthen our ESG strategy and put into words the principles that have shaped our culture from the beginning: transparency, sharing, caring, respect and gratitude.

These values are not new. They have guided the way we work, collaborate, lead and grow since day one. What matters now is how we bring them to life even more clearly and consistently across our organisation. We want to make them visible in the way we work, measurable in the way we track progress and tangible in the choices we make every day.

Because values only matter when people live them.

“Growth only matters when it creates lasting value for people, society and the future.”

Emmanuel Mottrie, CEO of TMC



# What sustainability means to us

“ Sustainability is about balance: improving today without compromising tomorrow. ”



**ROGIER VAN BEEK**  
CFO,  
TMC GROUP

“I see sustainability as taking a long-term view of how we run our business, balancing growth with responsibility and transparency.”



**ÅSA ÅHLÄNDER**  
CEO,  
TMC SWEDEN

“At TMC, sustainability is about building for the long term. It shapes how we grow, lead and make decisions. Our employeneurship model combines autonomy with accountability, and performance with ownership. Sustainable growth creates resilience, predictability and credibility over time.”

**JANA VAN AARDT**  
COMPLIANCE &  
SUSTAINABILITY OFFICER,  
TMC GROUP



“To me, sustainability is about everyone taking responsibility for today and for the future, while also coming together to create change collectively. Every action matters.”

**WALTER STALS**  
EMPLOYENEUR,  
TMC NETHERLANDS



“I see sustainability as a matter of balance: improving today without compromising tomorrow. It is about turning responsibility into meaningful change.”

**JASPER HEERINGS**  
GROUP CONTROLLER,  
TMC GROUP



“Finance measures performance. Sustainability measures impact. Together, they tell the full story of value creation.”

**GEERT VOOIJS**  
HR ADVISOR,  
TMC NETHERLANDS



“Sustainability means creating a work environment where people can thrive, where opportunities are fair and where a culture of care creates lasting value for society and future generations.”



**CRISTINA CARRASCAL**  
EMPLOYENEUR,  
TMC SPAIN

“Sustainability is about connection – between people, ideas and the planet. As a designer, I believe creativity can shape more conscious solutions, where beauty and purpose go hand in hand. When we design with care, we create impact that



**PEPIJN RINZEMA**  
TEL INNOVATION LAB  
PROJECT MANAGER,  
TMC NETHERLANDS

“Sustainability is about everyone taking personal responsibility for today and for the future, while also coming together to create change collectively. When those efforts come together, they can grow into something powerful.”

# Who we are today

## 3000+

Employeneurs

Titan Topco B.V. including all subsidiaries, together referred to in this statement as TMC, has grown into an international community of employeneurs with offices across Europe, North America, the Middle East and Africa. What started in the Netherlands in 2000 has grown step by step into a global company, while staying close to the culture and values that shaped it from the beginning.

## 18

Countries

Until 2023, that growth was almost entirely organic. TMC expanded by building strong communities, opening new offices and steadily deepening its expertise, always with a strong connection to clients and local teams.

## 42

Offices

## 80+

Nationalities

As client challenges became more complex, TMC started to complement that organic growth with targeted acquisitions. These are companies that share TMC's values and strengthen its capabilities, helping the organisation support clients even better while moving towards a more joined-up ESG strategy.

## €308M

Revenue in 2025

- Belgium
- Canada
- France
- Germany
- Greece
- Italy
- Luxembourg
- Mexico
- Netherlands
- Portugal
- Romania
- Saudi Arabia
- Spain
- Sweden
- Switzerland
- Tunisia
- USA
- United Arab Emirates



# The five pillars of employeneurship



TMC is a global high-tech consultancy company built around a distinctive idea: engineers, scientists and digital experts do their best work when they are trusted, supported and given the space to grow.

Our community brings together entrepreneurial professionals from around the world. They work across industries including high-tech, semiconductors, digital and IT, energy and renewables and life sciences, helping leading clients tackle complex challenges.

Employeneurship is the foundation of TMC's culture and the way we work. It shapes how we support our people, work together and create value. Built around autonomy, growth and community, it gives people the freedom to develop both professionally and personally.

## This model stands on five pillars:

### **A long-term working relationship**

Employeneurs have the security of a permanent contract, combined with the opportunity to work on diverse and challenging projects across industries. It creates stability, while also leaving room to grow and adapt over time.

### **Individual profit sharing**

Transparency plays an important role in how we work. Employeneurs have insight into their hourly rate, costs and performance-based profit share. That encourages ownership, entrepreneurial thinking and a clear link between contribution and reward.

### **Business cells**

These small, focused communities bring people together around technical expertise. They combine the strength of a close-knit team with the value of a strong knowledge network, where collaboration, peer support and continuous learning come naturally.

### **YOUiversity**

YOUiversity is our platform for personal and professional development. With coaching, a dedicated training budget and access to a wide range of learning opportunities, employeneurs shape their own path and continue to build their skills.

### **The Entrepreneurial Lab**

The Entrepreneurial Lab gives employeneurs space to explore ideas, pursue technical ambitions and work across disciplines. It is where innovation, curiosity and entrepreneurship come together, sometimes in ways that also contribute to social and environmental progress.

Together, these five pillars create an ecosystem that supports long-term engagement, personal growth and professional excellence. Employeneurship is more than a business model. It is a mindset that helps our people take ownership, keep developing and contribute with purpose to a more sustainable future.

THE  
ENTREPRENEURIAL  
**LAB**

# Where ideas get room to grow



## People drive technology. They need space to explore.

TEL is TMC's innovation playground: a place where employeneurs can experiment beyond client projects, develop entrepreneurial skills and turn ideas into action.

Founded in 2009, TEL brings together technology, entrepreneurship and creativity to tackle real-world challenges. It is one of the clearest expressions of employeneurship within TMC. At its core, TEL is about giving people the freedom and support to experiment. It encourages employeneurs to use technology in meaningful ways, including projects that contribute to sustainability, social impact and ethical business practices. In that sense, it helps ensure that entrepreneurship goes beyond profit alone.

Because people drive technology, we believe they need room to explore. TEL gives employeneurs access to technical resources, coaching and a strong peer network, helping them build prototypes, test concepts and gather feedback from users and experts.

One principle matters especially here: ownership. Employeneurs keep the rights to the projects they create. TMC does not

claim ownership or intellectual property. That approach encourages genuine entrepreneurship and gives people the freedom to pursue their ideas, whether those ideas succeed immediately, evolve over time or lead somewhere unexpected.

At the same time, TEL also recognises that innovation comes with uncertainty. Not every idea will have a positive outcome. Some projects may not work as intended, may not be adopted or may create new questions along the way. That is part of the process. TEL makes room for that by encouraging critical thinking, open feedback and continuous learning, helping employeneurs reflect on the broader impact of their work.

In the end, TEL is about creating space: space to try, learn, improve and build. It is a place for creativity and problem-solving, where the process can be just as valuable as the outcome.

The following pages highlight two TEL projects that offer a glimpse into how employeneurs use this space to experiment, learn and turn ideas into something meaningful.

## Liffy: a community platform for local sustainability

Liffy is a community-driven initiative designed to bring people together around local sustainability efforts. The idea is simple: create circles where individuals, businesses and organisations can connect, collaborate and work on projects that strengthen communities and support a healthier environment.

Before joining TMC, Michiel Vandale had already started working on Liffy with a small team. The ambition was there, but limited time, resources and experience made it difficult to move the idea forward. The concept stayed alive, waiting for the right environment to grow. And that environment came when Michiel became an employeneur at TMC.

With support from TEL, including mentoring in leadership, business modelling and entrepreneurship, Michiel transformed Liffy from an early idea into a more structured project. TEL gave him the tools, guidance and encouragement to sharpen the concept, build a team and start connecting with potential partners.

Liffy's mission is to connect local businesses, volunteering organisations and people who want to make a difference. The platform, now in its early development phase, is designed to make it easier to find volunteering opportunities, support sustainable businesses and take part in community initiatives. Instead of focusing on transactional rewards, Liffy is built around mutual support, where every action helps strengthen community ties and increase positive impact.

The project is currently in the market research phase. Initial app designs have been completed, and conversations are underway with cafés, artists and community groups.

Michiel's journey with Liffy shows how TEL helps employeneurs turn sustainability ambitions into something tangible, supported not only by resources but also by a network of shared purpose.

“ Sustainability starts and ends with people. It is about building a healthy community that wants to support a healthier world. Lasting change happens when people connect, work together and turn shared energy into positive action. ”

Michiel's Perspective on Sustainability



## Lock & Load: a smarter way to charge e-bikes

When Paul Stöver noticed that colleagues were struggling to charge their e-bikes easily and securely at work, he saw more than a practical inconvenience. He saw an opportunity to make sustainable mobility more accessible. That insight led to Lock & Load: a secure, easy-to-use charging station for e-bikes.

The idea gained momentum when Paul joined the TEL Championship, a one-year programme designed to help innovators turn problems into projects. Through workshops, market research and collaborative brainstorming, he refined the concept and built a working prototype. TEL supported that process with technical resources such as 3D printers, as well as a strong network of engineers and business experts.

From the start, Paul worked closely with Maarten Smit, who was a TMC intern at the time. Together, they set out to make sure the solution responded to real needs. They went into the community, spoke directly with e-bike users and gathered insights into the challenges people face in everyday use. That hands-on approach helped them understand not only the technical requirements, but also practical frustrations such as charging difficulties and concerns about bike security.

To build on those insights, Paul and Maarten organised feedback sessions at the TMC office. During informal “pizza sessions”, e-bike users shared their views on product features, brand identity and sustainability perceptions. Those conversations helped

shape the prototype and ensured the solution stayed closely connected to its intended users.

Paul's project is a strong example of the TEL model in action. He identified a real-world problem and took ownership of solving it. The project benefited from collaboration across disciplines, including engineering, marketing and business development. And by making e-bike charging easier and more secure, the solution encourages more people to choose sustainable transport, helping reduce emissions and support healthier cities.

Today, Paul's team has built and tested a working prototype and has already attracted interest from a small number of partners who provided bikes for testing. The next step is finding companies willing to invest in and pilot the solution. Paul is currently focusing on businesses that already use e-bikes in their operations, such as food delivery services, but the wider ambition is clear: to make the solution just as relevant for everyday commuters.

“ I believe in technology that makes sustainable choices easy. If we remove barriers and make it simple for people to do the right thing, real change happens. ”

Paul's perspective on sustainability

After this interview, the company was revealed as Revost. For more information: [www.revost.nl](http://www.revost.nl)



# Sustainability initiatives at TMC

## How sustainability is taking shape at TMC Netherlands

### From first steps to a more structured offer

In the Netherlands, TMC is exploring how sustainability can grow into a stronger and more structured service offering. A group of employeneurs has formed a sustainability core group to help define what that could look like and how it could create real value for clients.

This reflects two developments at once: growing client demand for solutions that address environmental challenges, and a growing awareness that sustainability can also improve efficiency, decision-making and long-term business value.

### Already part of the work we do

While the core group is still shaping its direction, sustainability is already part of many projects in the Netherlands. Employeneurs are using

their technical expertise to develop solutions that reduce environmental impact and improve resource efficiency. Examples include circularity models for system reuse, reverse logistics processes for spare parts recovery, filtration systems that improve air quality in industrial environments, decision frameworks for lower-emission transport and production flow improvements that reduce unnecessary movement and energy use for clients.

These examples show that sustainability at TMC is not a separate activity. In many cases, it is already part of the technical work we do

### A complex reality

At the same time, we also recognise the complexity of our role. TMC works with clients in

a wide range of sectors, including some whose activities have a negative environmental impact. Rather than stepping away from that reality, our ambition is to equip employeneurs to spot and apply more sustainable solutions in their daily work. Initiatives such as the Sustainability Awareness Journey help build that knowledge and confidence.

### What's next

The next step is to help the sustainability core group shape a clear service proposition and strengthen internal knowledge and training. Together, these steps will help TMC Netherlands move from individual initiatives to a more structured offering that complements our existing services.



## Sustainability Awareness Journey

The TMC Sustainability Awareness Journey, launched in the Netherlands in 2023, is designed for people working in technology-driven organisations who want to make a difference but do not always feel they have the right skills or knowledge to do so.

The journey starts with a closer look at the environmental challenges the world is facing today, what those challenges mean in practice and how participants can play a role in creating change. From there, the programme helps participants connect sustainability to their own field of expertise.

Using the Sustainable Excellence Model, participants are introduced to key concepts such as Life Cycle Assessments, the R-ladder, the shift from linear to circular business models and the impact of emerging EU regulations.

One of the distinctive elements of the programme is its focus on how people relate to nature. Participants are encouraged to reflect on that relationship and explore how reconnecting with the natural world can support greater balance and well-being.

The Sustainability Awareness Journey is not only about technical knowledge. It is also about personal development. The programme explores the Inner Development Goals and their relevance to the complex societal transitions we are going through.

Whether participants are TMC employeneurs or external professionals, each person goes through a personal learning journey, reflecting on their own perspective and discovering the role they can play in the shift towards more sustainable ways of working.

By combining practical tools, technical insight and attention to the human side of change, the programme helps participants move beyond theory and take meaningful action through hands-on case studies and teamwork.

## How sustainability is taking shape at TMC Sweden

### Turning data into direction

In Sweden, TMC has launched a dedicated business cell focused on helping clients move forward on sustainability through technical expertise and data-driven insight.

The initiative responds to growing demand from Swedish organisations that want to better understand, measure and manage their environmental impact. The team combines backgrounds in both business development and engineering and continues to expand its services in response to that need.

### Helping clients understand their impact

A central part of the work involves Life Cycle Assessments, or LCAs, for products and processes. By mapping environmental impact across the full value chain, TMC helps clients gain a clearer understanding of their carbon footprint and identify the main sources of

emissions. That insight forms the basis for targeted improvements and supports better decisions around materials, design and supply chain management.

Building on those LCA insights, TMC also develops third-party verified Environmental Product Declarations, or EPDs. These declarations help clients meet current regulatory requirements while also strengthening transparency and credibility in the market.

### How this works in practice

One example from 2025 is a collaboration with a Swedish manufacturer of automatic door openers. TMC Sweden carried out a full LCA and supported the development of an EPD for the product. The project included defining the scope and system boundaries, collecting and modelling data and training the client's internal team.

As a result, the client gained a much clearer view of CO2 emissions across the full product life cycle, along with practical guidance on how to prepare for future regulations and market expectations. The EPD is now being used to assess process improvements and explore lower-carbon material options, with plans to extend the same approach to other product lines.

### A broader sustainability offer

Beyond LCA and EPD work, TMC Sweden also supports clients with greenhouse gas reporting across Scope 1, 2 and 3 emissions. The team advises on circular economy strategies as well, helping organisations rethink product design and business models with reuse, repair and resource efficiency in mind. Supply chain evaluation is another important area, with support focused on reducing environmental impact and improving collaboration across the chain.

### Looking ahead

The Swedish sustainability business cell is still developing, but interest from the market is already strong. As carbon pricing and regulatory pressure continue to increase, more organisations are looking to integrate sustainability into the core of how they operate.

TMC's strength lies in the combination of engineering know-how and sustainability expertise. That allows the team not only to quantify environmental impact, but also to help clients act on it in practical ways.

Over the coming years, TMC Sweden aims to further expand its services in LCA, EPD and circular economy, supporting more organisations as sustainability becomes an increasingly important business driver in Sweden.

“ Understanding environmental impact is the first step towards practical action.. ”

# From values to structure



Over the past year, TMC has taken an important step forward in the way we approach ESG. We already had strong foundations in place, but this year we started to bring more structure to them. Through reflection, analysis and clearer choices, we began turning broad ambitions into a more focused direction.

A key part of that process was understanding what matters most: to our business, to our people and to the wider group of stakeholders around us. Through our double materiality assessment, we identified the environmental, social and governance topics that represent the biggest responsibilities, risks and opportunities for TMC.

That process also led to the development of TMC's Big 4: the four priority areas that connect our business model to our sustainability ambitions and help define where we want to focus first. They give us a clearer

starting point for building policies, action plans, targets and measurable progress across the organisation.

This is not just about meeting reporting requirements. It is about creating long-term value for our people, our clients, our shareholders and the broader society we are part of.

Our direction also connects naturally to a number of UN Sustainable Development Goals. In particular, SDG 8 on decent work and economic growth, SDG 9 on industry, innovation and infrastructure, SDG 4 on quality education and SDG 5 on gender equality fit closely with who we are and how we work.

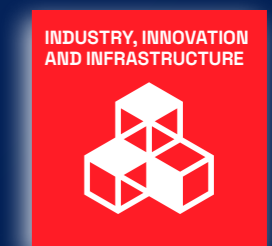
Together, they reflect TMC's ambition to empower employeneurs, support innovation and contribute to lasting progress in the industries and communities we are part of.

## Our Big 4 priorities

- Training and skills development
- Secure employment
- Diversity and gender equality
- Climate change mitigation

## Built on

- YOUiversity
- Long-term working relationships
- The Entrepreneurial Lab



# How we identified what matters most

## A first assessment in 2024

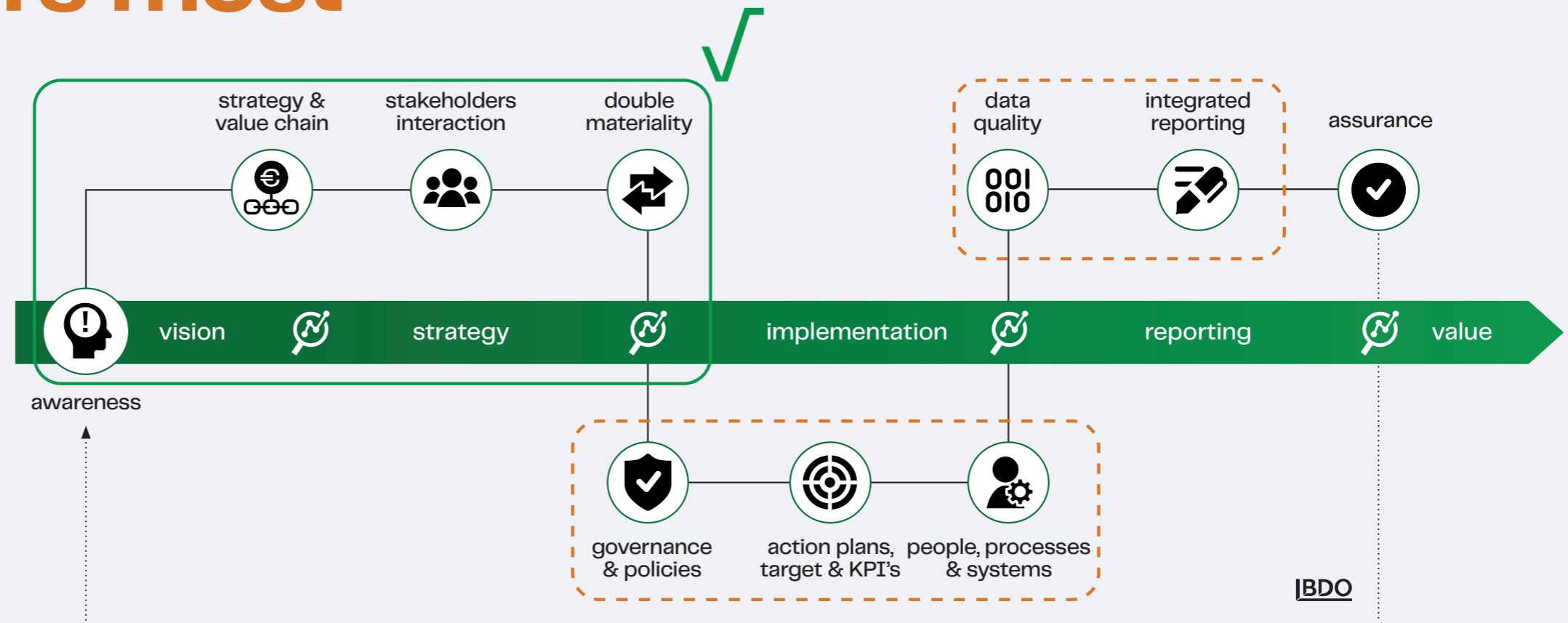
In 2024, TMC carried out its first double materiality assessment (DMA), using the approach set out in the EFRAG IG 1 Materiality Assessment Implementation Guidance.

This guidance helps companies apply the European Sustainability Reporting Standards (ESRS) under the Corporate Sustainability Reporting Directive (CSRD). Put simply, a double materiality assessment looks at sustainability from two angles: the impact a company has on people and the environment, and the risks and opportunities sustainability issues may create for the business itself.

## A stronger second review in 2025

When the proposed EU Omnibus Regulation was announced in early 2025, CSRD reporting requirements for certain companies were postponed until 2027. TMC used that extra time to strengthen and refine its initial assessment.

In 2025, we went through the full DMA process again, reviewed each step and added a broader strategic reflection on our Environmental, Social and Governance priorities. That helped us align our sustainability strategy more closely with the principles of double materiality and with the changing regulatory landscape.



### Building the right structure

To make sure the process was robust and methodologically sound, TMC worked together with BDO as an external advisor during the DMA. We also set up a governance structure around the CSRD process to strengthen internal alignment and make sure the right stakeholder perspectives were reflected throughout.

### With the Omnibus amendments

finalised in December 2025, TMC is now considered out of scope under

the revised CSRD requirements. As a result, we will follow a lighter reporting approach, which we will continue to build on step by step over time.

### What this section covers

The following section explains how the DMA was carried out. It covers the development of our ESG strategy, the value chain analysis, the stakeholder analysis, stakeholder interactions and the assessment of material topics from both an impact and a financial perspective.

The outcomes were validated to support their relevance and reliability, and we intend to review the assessment annually. The next phase will focus on implementation, with particular attention to governance and policies, action plans, targets and KPIs, and the people, processes and systems needed to support them.

This report provides a detailed overview of each step in the assessment.

# Building the structure behind the process

## Core Team

A small cross-functional team guides TMC's ESG approach, bringing together expertise from sustainability, finance, HR, innovation and the employeneur perspective, with sponsorship from the CEO and CFO.

## Country Level ESG Coordinators

At country level, designated ESG coordinators help drive implementation and support ESG reporting across the organisation.

What is already in place

## Functional working groups

As the next step, TMC will create working groups around specific ESG topics. These groups will help translate priorities into concrete actions, targets and improvements.

What comes next

**A key focus during the ESG strategy and DMA process was making sure every major step and decision was supported by the right governance structure and validated by management.**

In close collaboration with TMC's CFO, a CSRD core team was set up to guide the process. This team initially brought together the Compliance & Sustainability Officer, Group Controller, HR Advisor and a Project Manager from the Innovation Lab. Later, an employeneur joined the team to add another perspective from within the organisation.

Throughout the development of the DMA and ESG strategy, the core team worked closely together, with sponsorship from the CEO and CFO. That helped ensure strong alignment, clear ownership and support at leadership level.

After the first DMA, TMC expanded this governance structure by introducing ESG coordinators at country level. These coordinators are

responsible for helping implement ESG initiatives and support local reporting within their own organisations.

As we move into the implementation phase, the next step will be to establish additional functional working groups across the business. These groups will focus on specific ESG topics and help translate priorities into concrete actions, targets and improvements.

This process does more than support reporting. It also creates an opportunity to strengthen knowledge and capabilities across the company, involving both internal staff and employeneurs. By bringing in perspectives from different countries, departments and areas of expertise, TMC is building the internal capacity needed for ongoing sustainability reporting and more informed strategic decision-making.

This approach also supports alignment with ESRS requirements around transparency, traceability and meaningful stakeholder engagement.

# How we built our longlist

**As a starting point for the double materiality assessment, TMC developed a longlist of relevant sustainability topics by reviewing the full ESRS framework.**

This process was led by the CSRD core team in collaboration with external sustainability experts. The team also drew on ongoing interactions with both internal and external stakeholders to assess which topics were most relevant for TMC. While this first selection was based on existing insights, it was later validated through sessions with the board and Works Council, and cross-checked against stakeholder interactions such as customer requests, conversations with investors and lenders, and meetings with employees.

Each topic was considered in the context of TMC's business model as a consultancy organisation with a service-based structure, leased office spaces and a mobile workforce. The team looked at both strategic relevance and the potential for impact.

## Environmental topics

Climate change mitigation was identified as relevant, reflecting both regulatory expectations and TMC's position in the market. Climate change adaptation was also considered relevant, especially as a commercial opportunity through client services. Energy was included because of TMC's impact through clients working in renewable energy as well as our own footprint related to travel.

Pollution, water and biodiversity were initially assessed as not directly relevant to TMC's own operations, given its non-manufacturing business model. At the same time, employees may influence these topics through client projects. For that reason, a follow-up analysis of project types is planned for a later stage.

Circular economy was considered relevant, particularly because many client engagements already involve circularity-related themes, creating potential for positive impact.

## Social topics

Own workforce was clearly identified as relevant. This includes working conditions, equal pay, wellbeing and the broader experience of working within an international organisation. Workers in the value chain and affected communities were considered not relevant because of TMC's limited upstream and downstream activities and the lack of direct community disruption in its own operations.

For consumers and end users, information privacy and personal safety were considered relevant due to the nature of some projects, which may involve sensitive data or safety-critical applications. Inclusion of consumers and end users was not considered relevant in this context, as TMC mainly operates in a B2B environment.

## Governance topics

Corporate culture and whistleblower protection were identified as relevant because of their importance to internal governance and compliance.

Political engagement was initially considered relevant during the first validation session, partly because TMC operates in some regions through agents or intermediaries. Later in the DMA process, however, the topic was assessed as not material when measured against the official definition.

Supplier relationship management, including payment practices, was considered relevant due to TMC's supplier policy and contractual responsibilities. Corruption and bribery were also identified as relevant governance risk areas. Animal welfare was excluded, as it does not apply to TMC's operations.

This longlist formed the basis for the next stage of the assessment, where topics were screened for both impact and financial relevance and then validated through stakeholder engagement.

# Where impact, risk and opportunity can show up

To support the double materiality assessment, TMC carried out a value chain analysis to identify where relevant impacts, risks and opportunities may arise across the business.

This exercise was aligned with the requirements of ESRS 2 and aimed to clarify how sustainability topics relate to TMC's upstream activities, own operations and downstream activities. The reporting scope, and therefore the scope of the value chain analysis, covers the whole of TMC: Titan Topco B.V.

The analysis was built around three core dimensions:

### 1. Activities

We mapped the main business activities across the value chain, including education and training, building and car rental, consultancy services, IT operations, recruitment, marketing and service delivery. Each activity was assessed for its relevance to ESRS topics and for its potential positive and negative impacts.

### 2. Resources and relationships

For each activity, we identified the key resources involved, such as IT infrastructure, training materials and financial investments, as well as the most relevant stakeholder relationships, including employees, suppliers, clients and investors. This helped us better understand dependencies and identify potential ESG hotspots.

### 3. Link to ESRS topics

Each activity was then linked to relevant ESRS topics based on its impact profile. For example:

- training and recruitment were linked to S1 Own Workforce topics such as secure employment, health and safety and privacy;
- IT operations were linked to E1 Climate Change and E5 Circular Economy because of energy use and e-waste;

- consultancy services were linked to G1 Business Conduct, E1 Climate Change and S4 Consumers and End Users, reflecting governance, safety and project-related implications.

We also looked at the geographical relevance of activities, including where operations are centralised, such as IT and finance in the Netherlands, and where services are delivered internationally. This helped identify country-specific risks and opportunities.

For each activity, we documented:

- impacts: positive and negative sustainability impacts;
- risks: potential regulatory, reputational, operational and financial risks;
- opportunities: strategic opportunities to improve ESG performance, support access to green financing or strengthen stakeholder trust.

This value chain analysis created a clearer foundation for identifying which ESRS topics are most relevant to TMC and where they are most likely to show up in practice. It also supports the next phase of our work, including the development of more targeted KPIs and action plans.

# What we heard and how we used it

Stakeholder input plays an important role in assessing the relevance of sustainability issues. It helps us understand not only the possible impact of those issues, but also the risks and opportunities they may create for TMC.

Stakeholder perspectives support both the value chain analysis and the later validation of material topics.

TMC grouped stakeholders into three broad categories: those directly affected by our activities, those who use our sustainability reporting and those who fall into both groups. Each stakeholder group was then assessed based on two factors: its importance to TMC's operations and its level of influence on the company.

This resulted in four engagement levels:

- **Interaction Needed:** customers, employeneurs, internal employees, the Works Council, lenders, investors and other shareholders
- **Keep Satisfied:** governments and regulators
- **Inform:** suppliers, freelancers, auditors and the media
- **Monitor:** Nature, considered a silent stakeholder, and the wider community, which may be affected by TMC's operations

TMC brought stakeholder perspectives into the DMA mainly through ongoing day-to-day interactions. While structured consultations with external stakeholders specifically for the purpose of the assessment were still limited, the core team drew on existing knowledge and experience from across the organisation to inform the process.

Finance contributed insights based on engagement with suppliers, investors and banks. Sustainability and Compliance considered requests for ESG-related information from customers, investors and lenders. HR provided input based on daily interaction with employees

and employeneurs. In addition, the TEL Lab project lead contributed a focused employeneur perspective.

Across these interactions, several recurring themes emerged. One of the clearest was the expectation that TMC will formalise carbon reduction targets. There was also growing interest in expanding EcoVadis coverage across more parts of the group, particularly among lenders and customers. In addition, diversity and gender equality remain important topics, with stakeholders asking for greater transparency and visible progress.



These insights were considered sufficient to start the materiality process. After the initial assessment, the outcomes were validated in a more structured way through a DMA validation session with management, consultations with the Works Council, meetings with the Board and knowledge sessions with international management and department heads.

# How we assessed what matters

The CSRD asks companies to assess material topics through the lens of double materiality. In practice, that means looking at sustainability from two directions. One is **impact materiality**: how the company's activities affect people and the environment. The other is **financial materiality**: how sustainability issues may affect the company's financial performance, position or future development.

A topic is considered material if it is significant from either of these perspectives. This approach helps make sure sustainability reporting reflects both business relevance and broader responsibility.

## Scoring impact materiality

For impact materiality, topics are assessed based on their actual or potential effects on people and the environment, including both positive and negative impacts.

The assessment uses a five-point scale and looks at several criteria:

- scale: how severe or beneficial the impact is
- scope: how widespread the impact is
- irremediability: how difficult it would be to reverse a negative impact
- likelihood: how likely a potential future impact is

Actual impacts are scored based on scale and scope, with irremediability included for negative impacts. Potential impacts are scored using scale, scope and likelihood, and for negative impacts, irremediability is also taken into account.

For human rights-related issues, severity takes priority over likelihood. That means very severe impacts may still be considered material even if they are less likely to occur.

A topic is considered material from an impact perspective when it reaches an average score of 3.5 or higher out of 5. Topics just below that threshold are reviewed as borderline cases.

## Scoring financial materiality

Financial materiality looks at the risks and opportunities sustainability matters may create for TMC's financial performance or position.

This assessment also uses a five-point scale and considers:

- resource dependency
- stakeholder dependency
- financial magnitude
- likelihood

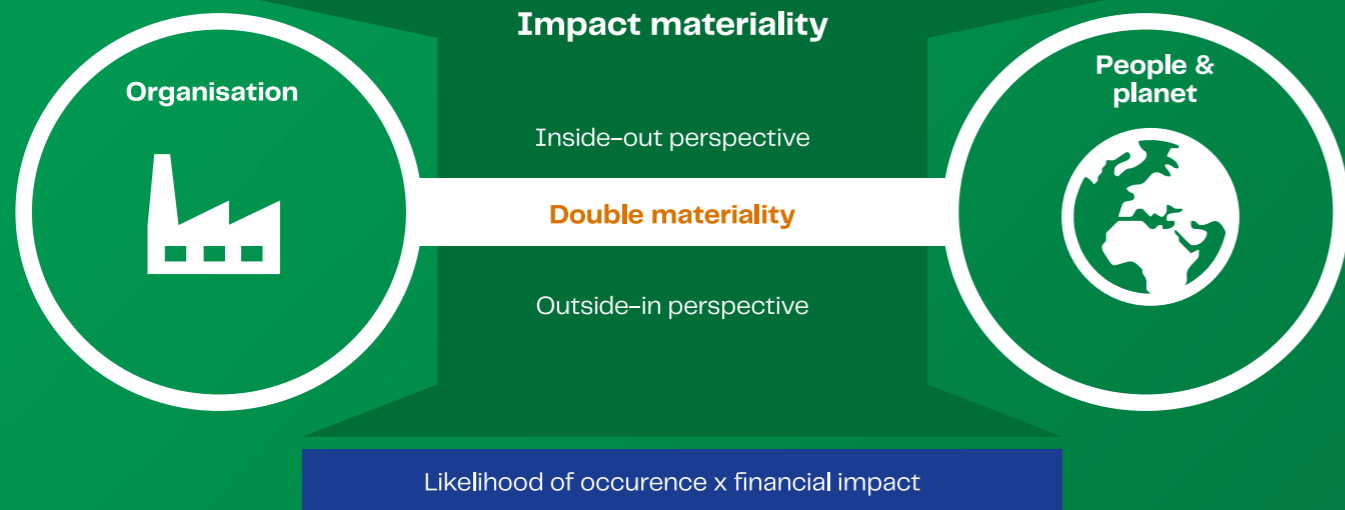
Both risks and opportunities are assessed. In most cases, the score is based on the combination of likelihood and impact. Mitigation measures are not included in the raw score, as the intention is to

reflect the inherent risk or opportunity.

A topic is considered material from a financial perspective when it scores 2.5 or higher out of 5. Topics just below that level are also reviewed as borderline cases.

Borderline topics are discussed further during validation sessions and may still be classified as material if that is considered appropriate. This process results in a transparent overview of material, borderline and non-material topics and supports clear, structured reporting.

|                 | Actual impact                  | Potential impact   |
|-----------------|--------------------------------|--|
| Negative impact | Scale, size and recoverability | Scale, size, recoverability and likelihood of occurrence |
| Positive impact | Scale and size                 | Scale, size and likelihood of occurrence                 |



# What the assessment showed

The topics listed below were identified as material through the double materiality

|         |                  |   |   |
|---------|------------------|---|---|
| ESRS E1 | Climate change   | Climate change mitigation                 |   |
| ESRS E1 | Climate change   | Energy                                    |   |
| ESRS S1 | Own workforce    | Working conditions                        | Secure employment                                     |
| ESRS S1 | Own workforce    | Working conditions                        | Social dialogue                                       |
| ESRS S1 | Own workforce    | Working conditions                        | Work-life balance                                     |
| ESRS S1 | Own workforce    | Equal treatment and opportunities for all | Gender equality and equal pay for work of equal value |
| ESRS S1 | Own workforce    | Equal treatment and opportunities for all | Training and skills development                       |
| ESRS S1 | Own workforce    | Equal treatment and opportunities for all | Diversity   |
| ESRS S1 | Own workforce    | Other work-related rights                 | Privacy   |
| ESRS G1 | Business Conduct | Corporate culture                         |   |

The outcome of the assessment reflects TMC's current understanding of where the most relevant ESG impacts, risks and opportunities lie. We see our double materiality assessment as a living document. As TMC, our stakeholders and the wider context

continue to evolve, we will review and refine it regularly. Sharing this report is also a way to further test and strengthen our direction through broader stakeholder dialogue. If you would like to share feedback, please contact us at [esg@tmc.nl](mailto:esg@tmc.nl).

## Strategy and next steps

As TMC is still in the early stages of building a more structured ESG approach, we saw a clear need for focus. That led to the development of TMC's Big 4: the four priority areas where we believe we can make the biggest difference and create the most meaningful progress.

Two of these priorities are already deeply rooted in the way TMC works. Secure employment and training and skills development are part of the employeneurship model itself. They reflect how we support people, help them grow and build long-term relationships.

From the remaining material topics, we selected two additional priorities that are especially important for moving our ESG ambitions forward: climate change mitigation and diversity and gender equality.

Together, these four themes form TMC's Big 4:

1. Climate change mitigation
2. Training and skills development
3. Secure employment
4. Diversity and gender equality

These are the areas where we will focus first in order to create clear actions,

set priorities and make measurable progress.

This does not mean other material topics will be left aside. They will also be addressed over time through dedicated strategies, KPIs and action plans, as our ESG approach continues to develop.

By focusing on areas where we can lead and create impact, we reinforce our commitment to secure employment, personal and professional growth, and an inclusive and more sustainable future for our stakeholders.

## Our strategy

To become the global home of employeneurs

### TMC's Big 4



### Employeneurship model



### Our core values

Transparency // Sharing // Caring // Respect // Gratitude

Values + Employeneurship model + TMC's Big 4  
= The global home of employeneurs

# Climate change mitigation

Over the past three years, TMC has calculated its full carbon footprint in partnership with Sami, an external carbon footprint specialist, creating a clearer picture of emissions across Scope 1, 2 and 3.

That work gives us a stronger basis for understanding where our emissions come from and where the biggest opportunities for improvement lie. Several initiatives have already been introduced to support emission reduction, including a bicycle plan in the Netherlands and incentives for electric vehicles. In Belgium, non-electric company cars are already being phased out, and a similar shift is planned in the Netherlands.

Current efforts focus on improving the quality and completeness of the underlying data, particularly for Scope 3 emissions. Better data is essential for building a reliable baseline and shaping a meaningful carbon reduction strategy. Once our data systems are sufficiently mature, we will develop a more formal reduction plan

together with external experts.

The figures below reflect TMC's carbon footprint calculations over the past three years. The largest share of our footprint comes from travel-related emissions, including employee commuting and business travel. These emissions are primarily estimated through an annual employee survey.

Over time, the response rate to this survey has improved, resulting in more complete and more reliable Scope 3 data. That improvement in data quality also helps explain part of the year-on-year movement in reported emissions and gives us a better understanding of our main emission drivers.

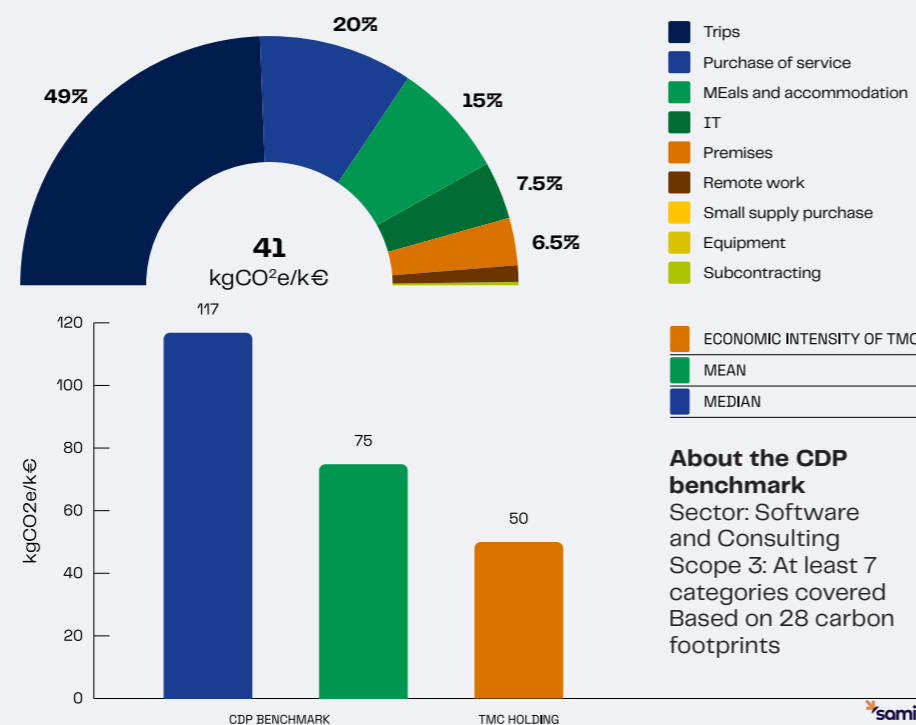
| Scope | 2023   | 2024    | 2025*   |
|-------|--------|---------|---------|
| 1     | 1883,2 | 1550,3  | 1272,9  |
| 2     | 267,5  | 481,5   | 408,7   |
| 3     | 8807,2 | 11378,0 | 10388,0 |

\*Excluding 2025 acquisitions Level 21 and Adventec Scope per year in tCO<sub>2</sub>e

## Economic intensity benchmark

Economic intensity shows the ratio between our CO<sub>2</sub>e emissions and our turnover for the reference year. It helps put our carbon footprint into context by allowing comparison with other companies in the sector, independent of company size or revenue growth.

By breaking this ratio down by category, we can better understand which activities contribute most to our position. The comparison data used comes from the Carbon Disclosure Project for the relevant sector.



## Calculations

Greenhouse gas emissions for Scope 1, 2 and 3 have been calculated using a hybrid methodology based on the GHG Protocol, combining activity-based and spend-based methods, with a primary reliance on spend data. Scope 2 emissions are assessed using the market-based method.

In 2024, TMC grew both organically and through acquisitions. The increase in total emissions between 2023 and 2024, particularly in Scope 3, is largely linked to

that growth. At the same time, year-on-year changes may also reflect refinements in methodology, updated assumptions and improved data quality. This includes changes in the extrapolation of employee survey data for travel-related emissions, as well as differences in reported spend on purchased services.

As in all carbon accounting, a number of assumptions are required. The results should therefore be read in the context of an approach that is still maturing and improving over time.

## Greenhouse Gas Intensity Metrics:

|                    | 2023                             | 2024                             | 2025                             |
|--------------------|----------------------------------|----------------------------------|----------------------------------|
| Total              | 10,958 tCO <sub>2</sub> e        | 13,410 tCO <sub>2</sub> e        | 12,069 tCO <sub>2</sub> e        |
| Economic Intensity | 51 kgCO <sub>2</sub> e/k€        | 50 kgCO <sub>2</sub> e/ k€       | 41 kgCO <sub>2</sub> e/ k€       |
| Employee Intensity | 3.8 tCO <sub>2</sub> e/ employee | 3.6 tCO <sub>2</sub> e/ employee | 2.9 tCO <sub>2</sub> e/ employee |

## Progress in Carbon Footprint Measurement and Reduction Planning

| 2023                               | 2024                                | 2025                             | 2026  | 2027  | 2028  |
|------------------------------------|-------------------------------------|----------------------------------|---|---|---|
| First Carbon footprint measurement | Second Carbon Footprint measurement | Focus on improving data quality. | Build reduction plan, formalise more reduction incentives and improve data quality. | Science-based emissions reduction plan for FY2027 | Publish and report progress on emission reductions. |

## Raising awareness through education

In addition to data-driven carbon footprint measurement and reduction initiatives, TMC also focuses on awareness raising. Together with Sami, TMC hosted climate change awareness workshops that were open to all employees. These sessions aimed to

strengthen understanding of climate-related challenges, link global issues to daily work and personal choices, and support employeneurs and employees in becoming more conscious contributors to climate change mitigation.



## 2 Training and skills development

Helping people grow is one of the clearest expressions of TMC's purpose. Through YOUNiversity, our internal development platform, employeneurs are supported in building both technical expertise and personal skills. The goal is not only to help people perform well in the role they have today, but also to give them the tools to keep developing over time.

In 2025, TMC invested €2,355,591 in training and skills development. Most TMC entities offer a yearly training budget of around €2,000 to €2,500 per employee, which can be used for training, coaching or other forms of development.

Training and skills development is one of TMC's Big 4 ESG priorities. The next step is to improve data collection on learning and coaching activities across all countries and to strengthen consistency in how the model is applied. That will help TMC report more transparently and set stronger targets and KPIs for learning and development.

### Coaching

Coaching is a key part of TMC's development approach. It gives employeneurs the space to set goals, reflect on progress and receive guidance that supports leadership, communication, resilience and adaptability.

In the Netherlands, coaching is organised through YOUNiversity in partnership with Pontes, a specialist provider in soft-skill

development and personal growth. Other countries, such as Sweden, use their own coaching structures. Our ambition is to create consistent access to coaching across all regions.

Between 2024 and 2025, an average of 27% of employees participated in an active coaching trajectory with Pontes, with quarterly participation ranging from 24% to 30% of the total employee population.

In practice, the real percentage is likely to be higher, as coaching in Sweden is not yet included in this figure and coaching also takes place outside the Pontes environment. That underlines both the relevance of coaching within TMC and the need for better global reporting.

### Knowledge Sharing

Alongside formal training and coaching, TMC encourages a strong culture of knowledge sharing.

One well-known example is Let's Talk About Your Expertise (LTYA), a series of interactive sessions in which employeneurs share project insights, technical knowledge and best practices in an informal setting. These sessions often cover specialist themes such as Operational Excellence, Supply Chain Management and Smart Organisation, and are typically combined with networking opportunities to encourage exchange and collaboration.

# 3 Secure employment

Secure employment is one of the foundations of TMC's employeurship model and a key part of our sustainability ambition.

At TMC, long-term working relationships are not an afterthought. They are built into the model. In the Netherlands, this is reflected in the practice of offering permanent contracts from day one. That approach gives people stability, income security and a stronger foundation for personal and

professional development. It also says something about the kind of relationship TMC wants to build with its people: one based on trust, continuity and partnership.

Employee engagement is measured through the employee Net Promoter Score (eNPS). In 2025, the survey was conducted globally for the third time and resulted in a score of 38. While this represents a decrease from the score of 48 in 2024, the change

is largely explained by a significantly higher response rate. Participation increased to 46%, up from 28% in 2024, following a targeted campaign to encourage broader employee input.

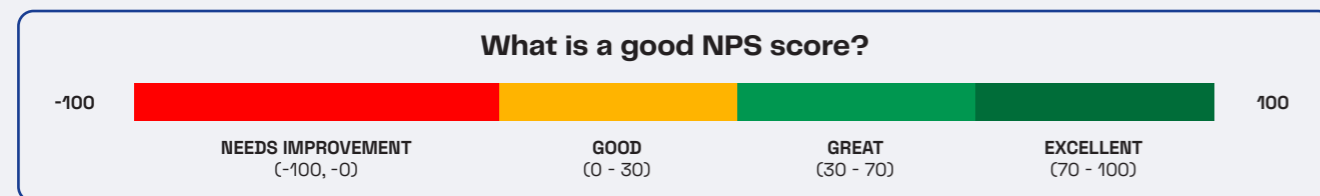
This higher response rate provides a more representative and reliable picture of how employees experience the organisation. Despite the decrease, a score of 38 is still considered a strong outcome, indicating overall positive engagement.

|                         |               |
|-------------------------|---------------|
| Permanent contracts:    | 1,109 (91.5%) |
| Fixed-term contracts:   | 37 (3.05%)    |
| Project contracts:      | 32 (2.64%)    |
| Self-employed:          | 29 (2.39%)    |
| Interns:                | 5 (0.41%)     |
| <b>Total workforce:</b> | <b>1,212</b>  |

### Key figures for the Netherlands

Consolidated group-wide data is not yet available. This data was extracted in October 2025 and excludes Mobilee in the Netherlands.

| KPI            | 2023 | 2024 | 2025 |
|----------------|------|------|------|
| eNPS score     | 45   | 48   | 38   |
| Response group | 31%  | 28%  | 46%  |



# 4 Diversity and gender equality

TMC is committed to creating a workplace where differences are respected, valued and supported by fair opportunities.

We aim to foster an environment where people are treated equitably, regardless of gender, age, nationality, cultural background, religion, race, ethnicity, disability, family responsibilities, sexual orientation or social origin.

Our global team includes more than 80 nationalities, and the average age of our employeurs is 35, with the largest group between 25 and 35 years old. We maintain a zero-tolerance approach to discrimination and harassment and continue to work on fair and inclusive practices across the organisation.

In 2023, we formalised this commitment through an ESG Code of Conduct and an Implementation Guide, helping embed diversity and inclusion more clearly into both culture and governance.

| Scope               | 2024 Data | 2025 Data |
|---------------------|-----------|-----------|
| # FTEs *            | 2819      | 3056      |
| Women               | 22%       | 21%       |
| Women executives ** | 9%        | 9%        |

\* Includes freelancers, \*\* Country-level CEO's

TMC is also committed to promoting gender equality and fair compensation. We aim to support equal pay for work of equal value and remove barriers that stand in the way of equal opportunity.

|                                      | 2024 | 2025   |
|--------------------------------------|------|--------|
| Unadjusted pay gap (including board) | 8,2% | 6,6% * |
| Unadjusted pay gap (excluding board) | 7,5% | 5,6%   |
| Netherlands average                  | 10%  |        |

\* Data is Dutch data only



**An unadjusted gender pay gap shows the percentage difference in average gross earnings between men and women across the workforce, without correcting for factors such as role, seniority, education or working hours. It is therefore a broad indicator of gender-related income inequality rather than a direct measure of equal pay for equal work.**

By making diversity, gender equality and fair pay part of TMC's Big 4 strategy, we are choosing to go beyond headline figures. The next step is to analyse pay structures more closely, identify where gaps exist and take targeted action to improve fairness and transparency across roles. Over time, we also aim to extend this analysis across the full group, rather than limiting it to the Netherlands.

## The structure behind responsible business

### How TMC is governed

**In 2025, TMC operated with a one-tier management structure, supported by private equity shareholders, a central executive and non-executive board at group level, and decentralised CEOs in the regional entities. Beneath group management sits a holding company that supports the regional organisations.**

TMC's non-executive board consists of seven members: five representing private equity shareholders, our founder and an independent board member. TMC has been backed by Apheon since 2019 and MML since 2024. One board member is independent.

The executive board consists of Emmanuel Mottrie, CEO, and Rogier van Beek, CFO. At this level, gender representation is currently all-male, which remains an important point of attention in the broader context of diversity and governance.

### Business conduct and safeguards

TMC has established a central ESG Code of Conduct that provides the basis for ethical behaviour and responsible business practices. While this code is in place, it has not yet been signed by all employees, and formal training beyond onboarding for new

business managers is still limited. Business conduct is further supported by the ESG brochure and ESG Implementation Guide, which set out principles of transparency and integrity. Mechanisms for identifying, reporting and investigating concerns include an anonymous reporting channel that allows employees to raise issues without fear of retaliation. Whistleblower channels and formal procedures have already been introduced in some entities, helping ensure local accessibility and compliance. At the same time, these processes are not yet fully consistent across the group, and further work is needed to strengthen group-wide procedures for investigation and non-retaliation.

Anti-corruption and anti-bribery measures are currently embedded in finance processes and aligned with international standards. These controls

include multi-person approval for financial transactions and clear segregation of duties to reduce the risk of fraud or bribery. Supplier agreements also require vendors to comply with anti-bribery laws and maintain their own integrity policies.

In 2025, TMC Holding achieved ISO/IEC 27001 certification, the internationally recognised standard for information security management systems. This confirms that robust processes are in place to protect information assets, manage security risks and support business continuity. It covers areas such as access control, network and system protection, incident response and continuous monitoring.

Achieving ISO 27001 reflects TMC's commitment to maintaining strong information security standards and safeguarding stakeholder trust.

## Making privacy part of daily practice

### A stronger local structure

In 2024, TMC's privacy governance was managed largely through a central structure. While that created consistency, it also highlighted the need for stronger local ownership and faster local responsiveness.

In 2025, TMC therefore introduced a new privacy governance model with designated Privacy Leads in each entity. These leads are responsible for supporting local privacy compliance and helping make sure data protection practices reflect the legal requirements and operational reality of their region. In 2026, the focus will be on fully onboarding and training these leads as part of a more mature privacy programme.

To support this decentralised structure, TMC established a central Privacy Team consisting of the IT Director, Group Controller and Compliance & Sustainability Officer. In 2025, the team was further supported by an external Privacy Officer, whose role is to help strengthen and accelerate the privacy programme across the organisation. Oversight is provided by an independent external Group Data Protection Officer, or DPO.

This shift reflects TMC's ambition to embed privacy more firmly into day-to-day operations. The central team provides direction, policy development and training, while local Privacy Leads help ensure awareness and ownership within the entities. For now, the central team still handles many operational activities, but over time the Privacy Leads will be trained to take on a more autonomous role.

### Training and accountability

Together, this structure is designed to balance consistency at group level with local relevance and accountability: an important step in further maturing TMC's privacy governance.

To support awareness and compliance, internal employees are required to complete annual GDPR training. Employeeneurs complete this training when they start at TMC, ensuring privacy principles are part of the onboarding experience from day one. Employees who work with employeneur and candidate data are also retrained regularly.

## How assessments and certifications help us improve

### Expanding EcoVadis across the group

TMC is gradually expanding the use of third-party sustainability assessments across the group. In 2025, **TMC Belgium** joined **Spain** and **Italy** in being assessed by EcoVadis. In 2026, **all Dutch operations** will also be included in the **EcoVadis** process.

Our ambition is to increase country-level coverage year by

year, moving step by step towards broader participation across the group.

TMC also aims to **improve its EcoVadis performance over time**. The assessment results help identify priority areas and guide internal action plans, making EcoVadis part of a broader process of continuous improvement.

|               | 2025                | 2026               | 2027               | 2028               |
|---------------|---------------------|--------------------|--------------------|--------------------|
| <b>Target</b> | 25 % group coverage | 50% Group Coverage | 75% Group Coverage | 80% Group Coverage |

### Recognised management system certifications

TMC Holding is certified under **ISO 27001** for information security management and **ISO 9001** for quality management. These certifications reflect our structured approach to protecting data, managing risk and maintaining consistent, high-quality processes across the organisation.

