



# SUSTAINABILITY AND ESG POLICY

COMMUNICATION

[nnit.com](http://nnit.com)



# TABLE OF CONTENTS

- INTRODUCTION ..... 1
- PURPOSE..... 2
- SCOPE ..... 2
- POLICY..... 2
- LABOR RIGHTS..... 3
- LABOR PRACTICES ..... 3
- WORKING ENVIRONMENT ..... 4
- ENVIRONMENT ..... 4
  - Environmental Objectives..... 4
  - Environmental Protection..... 5
  - Carbon Footprint ..... 5
  - Communicate with Passion, Pride and Respect ..... 5
  - Science Based Targets ..... 6
- ANTI CORRUPTION..... 6
  - Whistleblower Function..... 6
- COMMITMENT TO THE UN SUSTAINABLE DEVELOPMENT GOALS ..... 7
- THE ESG PRINCIPLES..... 7
- REPORTING..... 7
- GOVERNANCE AND ADOPTION ..... 8

# INTRODUCTION

Together, we make a mark on business and society; bringing digital transformation to life. This is NNIT's aspiration and the core of everything we do, also in terms of Sustainability & ESG.

In addition, NNIT's values are deeply rooted in our company, making it imperative that NNIT remains open and honest, conscience driven and value adding in all dealings.

We strongly believe that motivated, engaged and passionate people are crucial drivers for NNIT's pursuit of excellence and in relation to Sustainability & ESG.

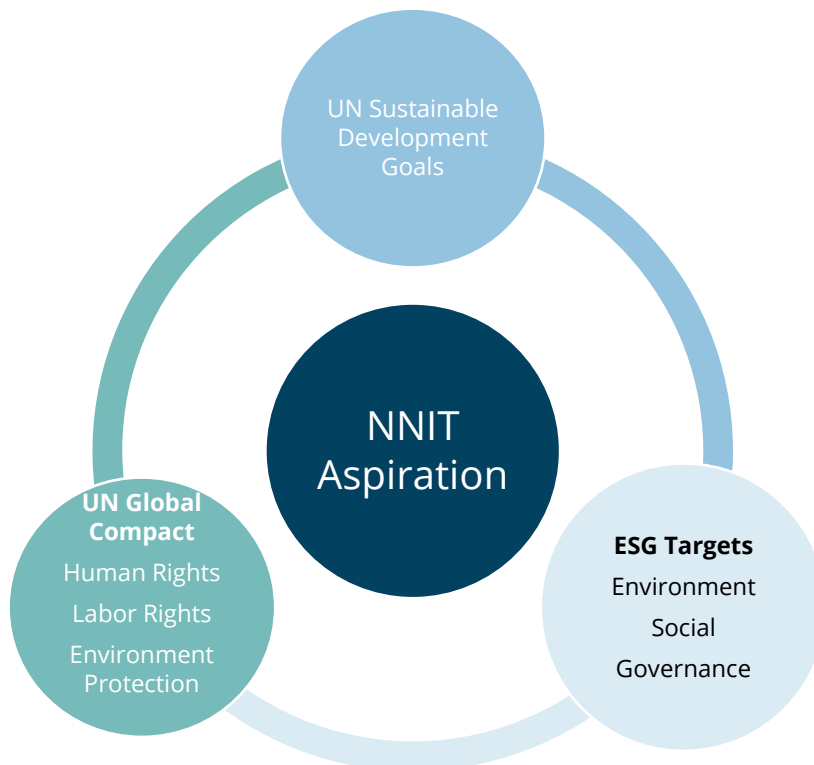
To us, putting good IT into practice for customers also means making a more positive mark on society. Digital transformation, on which NNIT builds its aspiration, plays a crucial role in the green transition of global society.

At the same time, the IT industry is a large contributor when it comes to CO<sub>2</sub> emissions. As a conscience-driven player in the IT industry, we wish to show how IT and digitalization can lead to a more sustainable future; and we wish to enable a dialogue about the sustainable digital transformation – leading to action – with our stakeholders.

We are committed to developing our business to be a profitable company while acting responsibly.

Our commitment to working with our responsibility is threefold:

- NNIT supports the UN Global Compact and follows the ten principles (see section 2)
- NNIT contributes to the work with the UN Sustainable Development Goals (see section 3),
- NNIT is measured on its progress in terms of ESG principles (see section 4).



# PURPOSE

The purpose of the Sustainability and ESG Policy is instruct all NNIT employees to make the right decision in their roles as part of a conscious-driven company.

NNIT's Sustainability & ESG Reports (incl. the Communication on Progress (COP) reports to the UN) are publicly available on our website in order for stakeholders to take NNIT's work within this area into consideration when deciding to do business with NNIT.

Vice versa, NNIT asks its suppliers to comply with the same principles as NNIT does (see Responsible Sourcing Standards on <https://www.nnit.com/about-us/corporate-responsibility/policies/>)

Wherever NNIT's expertise is relevant, NNIT wishes to contribute to the sustainability journey of others.

# SCOPE

NNIT's Sustainability & ESG Policy applies to NNIT's management and employees on all NNIT locations globally.

# POLICY

In addition to a general approach to proper and fair business conduct, NNIT supports the 10 principles of responsible business in [the UN Global Compact](#) with respect to human rights, labor rights, environment, and anti-corruption.

NNIT reports in accordance with the UN Global Compact requirements of publishing an annual Communication on Progress (COP) report, including the Statutory Corporate Social Responsibility Statement pursuant to section 99 a and 99 b of the Danish Financial Statements Act.

## Human Rights

NNIT adheres to principles 1 and 2 in the UN Global Compact and supports and respects the protection of internationally proclaimed human rights as well as ensuring that no entity of NNIT is complicit in any human rights violations.

NNIT acknowledges and complies with the requirements of [The Universal Declaration of Human Rights](#). We respect the human rights of all workers and treat employees with dignity and respect.

We ask all NNIT employees to work actively to ensure continued compliance in all aspects of their work.

NNIT respects and acknowledges cultural differences and disassociates itself from all discrimination based on race, religion, age, nationality, or sexual orientation.

NNIT requires that suppliers do not engage in any way in violation of human rights.

Read more:

- [NNIT's Responsible Sourcing Standards](#)

## UN GLOBAL COMPACT PRINCIPLES

### Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights

### Principle 2

Make sure that they are not complicit in any human rights abuses

- [NNIT's Diversity Policy](#)

## LABOR RIGHTS

NNIT adheres to principles 3, 4 and 5 in the UN Global Compact and thereby upholds the freedom of association, the right to collective bargaining and elimination of all forms of forced labor as well as child labor. NNIT also adheres to principle 6 by eliminating discrimination in respect of both employment and occupation.

NNIT recognizes the importance of complying with international law and adhering to the requirements protecting its employees. NNIT acknowledges the requirements of the International Labor Organization's conventions and declarations, including the Rio Declaration on Environment and Development, convention no. 155, as well as the Declaration of Fundamental Principles and Rights at work.

## LABOR PRACTICES

**Wages and Benefits:** NNIT pays employees at least the minimum wage required by law or the prevailing industry standard in the country and shall provide all legally mandated benefits, including medical insurance, social insurance, and pensions, in full and on time.

**Working hours and holidays:** NNIT does not breach local regulations on working hours and remunerates overtime in accordance with local laws and regulations as a minimum.

**Child labor:** NNIT does not recruit or employ child labor. The minimum age of workers shall be 15 years, or the minimum age set by the national laws in the country of manufacturing, whichever is higher. Young workers, i.e., those below the minimum age of 18, may only be employed for non-hazardous work.

**Freely chosen employment:** NNIT does not use forced or involuntary labor such as forced, bonded, indentured, or involuntary prison labor.

**Freedom of association and collective bargaining:** NNIT respects the rights of employees established in local law to join or not join labor organizations.

**Non-discrimination:** NNIT does not discriminate in our hiring or employment practices on grounds of race, national origin, religion, age, disability, gender, social status or marital status, pregnancy, sexual orientation, union membership or political affiliation.

**Treatment of employees:** NNIT treats employees with respect and dignity and must not subject them to any kind of cruel, inhuman or degrading

### UN GLOBAL COMPACT PRINCIPLES

#### Principle 7

Businesses should support a precautionary approach to environmental challenges

#### Principle 8

Undertake initiatives to promote greater environmental responsibility

#### Principle 9

Encourage the development and diffusion of environmentally friendly technologies

#### Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

#### Principle 4

The elimination of all forms of forced and compulsory labor

#### Principle 5

The effective abolition of child labor

#### Principle 6

The elimination of discrimination in respect of employment and occupation

punishment, physical, verbal or sexual abuse or harassment.

## WORKING ENVIRONMENT

NNIT prioritizes a sound and healthy work environment, as it is a precondition for flexibility, adaptability, and personal development. As part of NNIT's internal processes, we have developed a Working Environment Process, which covers all activities that are required to ensure a healthy working environment.

In January 1999, NNIT's Working Environment Council was established, and the document, "NNIT A/S - Arbejdsmiljøarbejde i Danmark" was later approved. NNIT continually focuses on its working environment to create optimal working conditions for employees as well as ensuring that accidents do not occur. Any employee who suffers an accident at work is one too many, and NNIT makes an effort to always keep employees safe from the risk of accidents at work.

Following Danish legislation, NNIT carries out a mandatory APV (workplace assessment survey) every three years for all Danish locations. Necessary or suggested actions based on the results are taken. NNIT's offices outside Denmark must adhere to the legislation of the country in which they are located.

## ENVIRONMENT

In correlation with principles 7, 8 and 9 in the UN Global Compact, NNIT supports and undertakes initiatives to promote greater environmental responsibility and encourages the development of more sustainable technologies. Furthermore, NNIT is committed to the International Labor Organization's (ILO) Rio Declaration on Environment and Development, convention no. 1554. NNIT fully accepts the responsibility to prioritize and develop all initiatives to make NNIT and its surroundings more sustainable.

In NNIT, we are committed to reduce our footprint and take the global environment and climate into consideration in everything we do, making a positive mark on society and contributing to a more sustainable future.

This means that NNIT must:

- Ensure that all employees share the commitment to deliver what is agreed with the customers in relation to sustainability.
- Measure and evaluate the environmental impact and status in order to continuously improve our services and solutions to our customers and the way we work.

Maintain the Environmental Management System based on relevant laws, requirements, the ISO 14001:2015 standard, and NNIT's aspiration and values.

### Environmental Objectives

As part of our Environmental Management System, we have stated four formal objectives as an addition to our overall commitment to the UN Global Compact.

- I. Reduce CO<sub>2</sub> emissions from HQ office space
- II. Reduce CO<sub>2</sub> emissions from business travel

- III. Increase fleet of non-fossil fueled company cars
- IV. Extend GHG Scope 3 reporting

### **Environmental Protection**

We continuously aim to reduce our use of resources and the environmental impact of our business activities.

NNIT is ISO 14001:2015 certified, in Denmark (HQ) and in China. These certifications relate to our Environmental Management System that has been implemented into our Quality Management System and focuses on our behavior, processes, and policies ensuring that we continue to act responsibly and reduce our footprint over time.

Today, as well as moving forward, NNIT will purchase energy from certified green sources for all locations in Denmark, which means that 100 % of NNIT's energy consumption in Denmark comes from green sources. NNIT continuously works to explore opportunities for optimized processes leading to less energy consumption or as a last resort, purchase climate credits as compensation for CO<sub>2</sub> emissions.

NNIT encourages all employees to act with environmental awareness. Wherever possible, NNIT makes use of technology solutions, including virtual meetings, to reduce the need for travel.

NNIT acknowledges its responsibility in terms of waste management and will continuously aim to lower the amount of waste and ensure that the environment is taken into consideration when handling waste. NNIT collaborates with third parties to re-use and/or discard e-waste in as sustainable a manner as possible.

NNIT's company car policy encourages all users to choose e-cars, and NNIT employees on all Danish locations have access to charger stations.

### **Carbon Footprint**

We commit to continuously reducing our carbon footprint, be transparent in our reporting and aim to create new processes to ensure sustainable development in all departments.

From 2020 and onwards, NNIT will monitor its energy and carbon footprint within scope 1, 2, and 3 for global NNIT locations and employees. The carbon footprint gives a general overview of NNIT's total greenhouse gas emissions. In alignment with our values of being open and honest, we encourage transparency and therefore present our emissions based on both a locations and a market method of measuring emissions.

To measure the CO<sub>2</sub> emission, we use the [Greenhouse Gas Protocol Initiative \(GHG protocol\)](#), the international standard and most widely used standard for measuring greenhouse gas emissions, developed by [World Resources Institute \(WRI\)](#) and [World Business Council for Sustainable Development \(WBCSD\)](#). The GHG protocol divides companies' direct, indirect, and value chain emissions into three scopes, thus covering all emissions stemming from regular business operations.

### **Communicate with Passion, Pride and Respect**

Passion is an integral part of our what we do, and it shows our commitment. Pride refers to our professional ability, including our focus on quality and service.

And we always show respect for the people and companies that we are in dialogue with, and we take responsibility for our actions.

## Science Based Targets

In August 2022, we committed to the [Science Based Targets initiative \(SBTi\)](#).

In the two years from our date of commitment, August 2022, we have been working on identifying and collecting data on the sources of our emissions throughout our value chain in order to set ambitious and realizable emissions reduction targets.

Read more in NNIT's Sustainability & ESG reports [here](#).

# ANTI-CORRUPTION

NNIT adheres to principle 10 in the UN Global Compact and works against corruption in all forms. NNIT asks of all employees that they work actively to ensure continued compliance in all aspects of their work.

NNIT complies with the United Nations Convention against corruption and all regulations on corruption and prohibited business practices applicable in the specific country. NNIT rejects all forms of bribery, facilitation payments, corruption, extortion, or embezzlement.

Our Business Ethics Code of Conduct forms the basis of our business in NNIT's entire operations. It provides guidance and outlines the responsibilities of the employees and management to protect NNIT from any malpractice that may undermine the company's business integrity and impact its long-term business success.

Business integrity: Giving or accepting business gifts, hospitality or entertainment is not allowed. Minor gifts and moderate entertainment may be part of customary business dealings and hence considered acceptable. To avoid gifts, hospitality or entertainment having undue influence on business decision, a maximum amount is defined by NNIT's management board and applies to all employees in the NNIT Group.

If and when the documents are updated, all employees receive notification to familiarize themselves with the content of the documents and officially sign that they have read, understand and comply with the guidelines.

Read more in NNIT's Business Ethics Code of Conduct [here](#).

## Whistleblower Function

NNIT expects all employees, management, the Board of Directors and any other person or entity doing business with NNIT to comply with applicable laws, regulations, and internal procedures.

NNIT is committed to detecting and preventing illegal activities, financial fraud, business ethics misconduct, security breaches or similar. Therefore, all employees, management, and the Board of Directors of NNIT as well as all other persons doing business with and/or advising NNIT such as suppliers, customers, business partners, lawyers or auditors are encouraged to report concerns regarding acts or omissions that could harm NNIT.

NNIT has standard internal communication channels in place, where concerns can be reported directly to managers, HR/Legal and even senior management, but at the same time we understand and recognize that in some situations

## UN GLOBAL COMPACT PRINCIPLES

### Principle 10

Businesses should work against corruption in all forms, including extortion and bribery



persons may be reluctant to report concerns due to a sense of loyalty towards NNIT or colleagues or for fear of retaliation.

NNIT has therefore established [a whistleblower function](#) covering all affiliates, enabling employees, the management, the Board of Directors of NNIT, business partners and advisors to NNIT and persons further specified in the Whistleblower Policy to report in a secure and confidential way *intern alia* breaches of EU legislation listed in the Whistleblower Directive, severe breaches of other parts of EU law or national law, including financial fraud, bribery and forgery, and other severe matters. The whistleblower function is also established to fulfil the Whistleblower Directive and national implementation legislation.

All NNIT employees will undergo regular training in NNIT's Whistleblower Program, and all NNIT employees will on an annual basis be obligated to document that they have read and understood the NNIT Whistleblower Policy. Read more in the Whistleblower Policy [here](#).

## COMMITMENT TO THE UN SUSTAINABLE DEVELOPMENT GOALS

NNIT's work with Sustainability & ESG is closely linked to [the UN's Sustainable Development Goals \(SDGs\)](#) focusing on the four SDGs where NNIT sees its work and expertise adding most value and contributing the most.

NNIT acknowledges and accepts the responsibility to not only comply with the required principles described above, but also to work continuously with contributions to a more sustainable world.

NNIT is committed to making a more positive mark on business and society through the company's activities within the framework of the UN SDGs.

Read more NNIT's Sustainability & ESG reports [here](#).

## THE ESG PRINCIPLES

NNIT is committed to working with Environmental, Social, and Governance (ESG) principles and is rated on its efforts within this framework on an annual basis.

As a listed company, NNIT recognizes its responsibility towards investors of conducting business aligned with ESG principles and continuously improving its efforts.

The annual ESG rating serves the purpose of identifying areas of improvement. It also provides investors and other stakeholders with an indication of risk related to NNIT.

## REPORTING

NNIT conducts annual audits of its internal and external impacts to continuously improve operation, and by extension leave a positive mark on our surroundings.

NNIT's annual reporting focuses on elements such as CO<sub>2</sub> emissions, share of renewable energy, employee health and turnover, gender diversity in management and boards, etc. Through these reports, NNIT aims to improve conditions for internal and external environments and show the company's progress in doing so.

Read more in NNIT's Sustainability & ESG reports [here](#).

## **GOVERNANCE AND ADOPTION**

The work with Sustainability & ESG in NNIT is anchored in the NNIT Board of Directors and the NNIT Management Group. However, all NNIT employees have a responsibility to contribute to the continuous improvement and not violating any of the UN Global Compact principles.

Policies related to Sustainability & ESG are approved by the NNIT Board of Directors and the NNIT Management Group.

This policy was adopted by the NNIT Board of Directors on August 9, 2023.

## **About NNIT**

NNIT is a leading provider of IT solutions to life sciences internationally, and to the public and enterprise sectors in Denmark. We focus on high complexity industries and thrive in environments where regulatory demands and complexity are high.

NNIT consists of group company NNIT A/S and subsidiaries SCALES. Together, these companies employ more than 1,700 people in Europe, Asia and USA.

