



NNIT's Corporate Responsibility Policy

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Table of Contents

1	NNIT'S CORPORATE RESPONSIBILITY	3
1.1	INTRODUCTION	3
1.2	PURPOSE	4
2	NNIT SUPPORTS THE UN GLOBAL COMPACT	5
2.1	HUMAN RIGHTS	5
2.2	LABOR RIGHTS	6
2.2.1	Labor Practices	6
2.2.2	Working Environment	7
2.3	ENVIRONMENT	7
2.3.1	Environmental Protection	7
2.3.2	NNIT's Carbon Footprint	8
2.4	ANTI-CORRUPTION	9
2.4.1	Whistleblower function	9
3	NNIT'S COMMITMENT TO THE UN SDGS	11
4	THE ESG PRINCIPLES	12
5	REPORTING	13
6	GOVERNANCE	14

1 NNIT's Corporate Responsibility

1.1 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 NNIT does, also in terms of corporate responsibility.

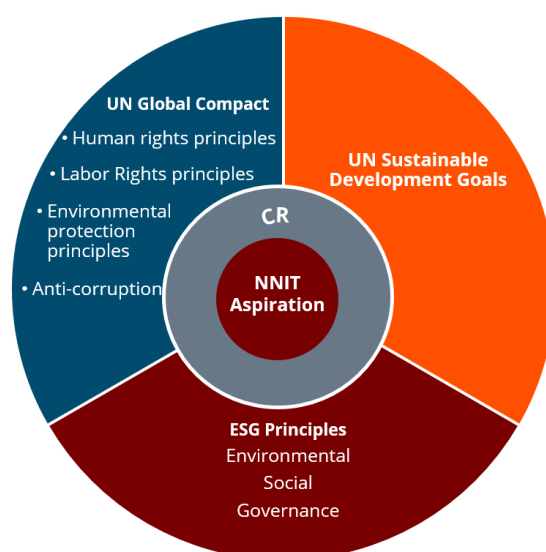
NNIT runs on people power. Together, the employees make the NNIT wheels spin, working in all time zones for customers around the world. NNIT's values are deeply rooted in the company, and as all NNIT employees can pride themselves on being open and honest, conscience driven and value adding, NNIT must live up to these values as a company as well. NNIT strongly believes that motivated, engaged and passionate people are crucial drivers for NNIT in the pursuit of excellence and in relation to corporate responsibility.

To NNIT, 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 the global society.

At the same time, the IT industry is a large contributor when it comes to CO₂ emissions. As a conscience-driven player in the IT industry, NNIT wishes to show how IT and digitization can lead to a more sustainable future. And NNIT wishes to enable a dialogue – leading to action – with its stakeholders about the sustainable digital transformation.

NNIT is committed to develop its business based on the combination of running a profitable company while acting responsibly. NNIT's commitment to working with its responsibility is threefold:

- NNIT supports the UN Global Compact and follows the 10 principles (see section 2)
- NNIT contributes to the work with the UN Sustainable Development Goals (see section 3), and
- NNIT is measured on its progress in terms of ESG principles (see section 4).



1.2 Purpose

NNIT's Corporate Responsibility Policy applies to NNIT's management and employees on all NNIT locations globally. It serves the purpose of instructing all NNIT employees to make the right decision in their roles as part of a conscious driven company.

NNIT's Corporate Responsibility 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 of 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.

2 NNIT supports the UN Global Compact

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.

2.1 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 with any human rights abuses.

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 of all employees in NNIT that they work actively to ensure continued compliance in all aspects of their work.

In all aspects, 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](#)

[NNIT's Diversity Policy](#)

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

2.2 Labor Rights

NNIT adheres to principles 3, 4 and 5 in the UN Global Compact and thereby uphold 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.

2.2.1 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 worker labor organizations.

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

Treatment of employees: NNIT treats employees with respect and dignity and shall not subject them to any kind of cruel, inhuman or degrading punishment, physical, verbal or sexual abuse or harassment.

UN GLOBAL COMPACT PRINCIPLES

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

2.2.2 Working Environment

NNIT places high priority on 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 has continued focus on its working environment to create optimal working conditions for employees as well as securing that accidents do not occur. Any employee who suffers an accident at work is one too many, and NNIT is making 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 offices outside Denmark must adhere to the legislation of the country in which they are based.

2.3 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.

NNIT is hence committed to making a positive mark on society and aims to contribute to a more sustainable future.

2.3.1 Environmental Protection

NNIT continuously aims to reduce its use of resources and the environmental impact of its business activities.

As an IT business, NNIT's main energy consumption derives from datacenters. Today as well as moving forward, NNIT purchases 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

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

opportunities for optimized processes leading to less energy consumption or as a last resort, purchase climate credits as compensation for CO₂ 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.

2.3.2 NNIT's Carbon Footprint

NNIT commits to continuously reduce our carbon footprint, be transparent in its reporting and aim to create new processes ensuring sustainable development in all departments.

From 2020 and onwards, NNIT monitors 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.

Aligned with NNIT's values of being open and honest, NNIT encourages transparency and therefore present its emissions based on both a locations-method and a market-based method of measuring emissions respectively.

To measure the CO₂ emission, NNIT uses 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.

Read more in NNIT's Corporate Responsibility reports [here](#).

2.4 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 outline 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](#).

2.4.1 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 detect and prevent 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 NNIT understands and recognizes that in some situations persons may be reluctant to report concerns due to a sense of loyalty towards NNIT or colleagues or in the worst case in 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*



UN GLOBAL COMPACT PRINCIPLES

Principle 10

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

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](#).

3 NNIT's commitment to the UN SDGs

NNIT's work with Corporate Responsibility 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.

NNIT's commitment to the UN SDGs

4: Quality Education: NNIT is committed to the work of establishing quality education in the areas relevant to the IT industry. NNIT is committed to share knowledge about IT and equipping children and young people with competencies to better navigate the digital world.

NNIT also believes that the IT industry will benefit from providing young minds better education to learn more about IT.

5: Gender Equality: NNIT is a firm believer in equal rights and opportunities and believes that a diverse team performs better and thrives more. NNIT is committed to minimizing the gender gap in NNIT as well as in the IT industry.

9: Industry, Innovation, and Infrastructure: NNIT is dedicated to support sustainable development in the IT-industry. NNIT participates in network and organizations working to ensure sustainable development on several parameters in the IT industry. As an IT company, NNIT sees it as a responsibility to provide innovative solutions to the benefit of the green transition of society.

12: Responsible consumption and production: Committing to reduce our CO₂ emissions and contribute to a better environment is of great importance to NNIT. NNIT is working continuously to reduce its Carbon Footprint and implement more solutions to increase NNIT's sustainability further.

Read more NNIT's Corporate Responsibility reports [here](#).



4 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.

In 2020, NNIT was rated as a low-risk company. NNIT works continuously to retain or lower the score (in 2020: 17.1 out of 100, 0 being the best rating).

5 Reporting

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

NNIT's annual reporting focuses on elements such as CO₂ emissions, share of renewable energy, employee health and turnover, gender diversity in management and boards, etc. Through these reports, NNIT aim to improve conditions for NNIT's internal and external environments and show the company's progress in doing so.

Read more in NNIT's Corporate Responsibility reports [here](#).

6 Governance

The work with corporate responsibility in NNIT is anchored with the NNIT Board of Directors and the Top Management Group (NNITMAN). However, all NNIT employees have a responsibility in contributing to the continuous improvement and to not violate any of the UN Global Compact principles.

Policies related to corporate responsibility are approved by the NNIT Board of Directors and the Top Management Group (NNITMAN).