

## SP Group CSR policy

At SP Group, we are committed to driving sustainability. We believe that acting responsibly goes hand in hand with driving our international footprint and enhancing our earnings and growth.

With a view to ensuring that we deliver on our responsibility ambition, we have laid down a CSR policy for SP Group, which reflects our fundamental commitment to developing the best plastics solutions for the benefit of our customers and the surrounding environment. Our CSR policy thus sets the scope for all our activities and for our profile as an attractive workplace and business partner.

SP Group's CSR policy has been designed so as to ensure that we comply with all applicable laws, regulations, standards and industry practice. We are a signatory to the ten principles on corporate social responsibility under the UN Global Compact, and we work actively towards achieving the UN Sustainable Development Goals. We have aligned our efforts with the ESG paradigms applied by investors, and our CSR policy consequently covers the following areas: environment and climate, social responsibility and corporate governance.

We continually engage with our suppliers to promote their work on corporate social responsibility. To that end, we have prepared a Supplier Code of Conduct, which forms the basis of our expectations for and dialogue with our suppliers on corporate social responsibility. We primarily focus on our suppliers of moulds, as our materials suppliers are large well-reputed international groups that are already reporting in detail on their CSR efforts.

### **Environment and climate**

We will work systematically to reduce our impact on the environment, fight climate change and promote environmental responsibility through our certified environmental management systems. Plastics generally possess a number of unique properties that play an indispensable role in society, and if produced, applied and handled with care, plastics have a favourable impact on the environment.

Against this background, we strive to use environmentally friendly materials in our production and development processes, to limit our consumption of materials, wastage and waste volumes and to reuse materials and products to the greatest extent possible. In addition, we aim to limit our consumption of heating, water and energy, our greenhouse gas emissions and our production of noise, odour and dust.

Accordingly, in developing new products, we always aim for them to have as little adverse environmental impact as possible, and we promote the development and diffusion of environmentally friendly technologies.

With a view to delivering on our commitment to act in an environmentally responsible manner, all our production and processing facilities are certified to the ISO 9001 and ISO 14001 standards. Moreover, we comply with all environmental directives, including REACH, Candidate List of Substances of Very High Concern and the RoHS Directive.

## **Social responsibility**

### **Working conditions**

We provide attractive terms of employment for our employees by, for example, complying with applicable legislation and collective agreements for our areas of activity in relation to pay and other employment terms. We also provide our employees with opportunities for professional development through, for example, supplementary education and training.

At SP Group, we always ensure healthy and safe workplaces for our employees, and we respect their right to equal and fair working conditions in accordance with the principles of the UN Global Compact.

We comply with relevant legislation, national as well as local, recognising the freedom of association of our employees and their right to collective bargaining, rest and leisure, equal pay for women and men, anti-discrimination, childcare leave and equal access to jobs and careers. If independent trade unions are prohibited or discouraged in a country, we will facilitate systems through which employees can appoint representatives to negotiate with management. Our primary focus is on high-risk countries, and we ensure that such rights are communicated to all employees in their local language.

At SP Group, we do not tolerate any form of compulsory or child labour. Employees between the ages of 15 and 18 are not allowed to perform hazardous work or to work nights. We always strive to protect our employees from any kind of physical punishment, mental and/or physical coercion, or harassment.

### **Women in management**

The Board of Directors of SP Group A/S has adopted a policy setting out to increase the proportion of the under-represented gender at the company's other management levels and to promote diversity, the aim being to fill management positions based on the qualifications required while promoting the representation of women where possible.

### **Diversity**

As an international company, we respect the cultures and traditions of others, and we insist that our relations be characterised by mutual trust and respect.

We do not discriminate on grounds of age, gender, race, colour, disability, religion or belief, language, national or social origin, union membership, political views or any other grounds recognised by international conventions. Any decision concerning appointments, employment conditions, promotions or remuneration is made on the basis of relevant and objective criteria.

### **Human rights**

Across the Group, we support and respect the protection of international human rights. In countries in which there is a risk of infringement of human rights, we strive to prevent any human rights abuse, and should we become involved in such abuse, we take corrective action.

Our products allow us to contribute to protecting human rights, locally and globally, primarily through health products that contribute to quality health services and products that help improve food safety.

## **Corporate governance**

### **Anti-corruption**

We wish to maintain a high level of integrity and responsibility across our external relations, and we do not participate in corruption in any form, whether it be extortion, bribery, embezzlement, fraud, facilitation payments, nepotism, cartel formation or conflicts of interest. We do not offer or promise any form of bribe for the purpose of exerting undue influence on public-sector employees, judges or business partners, nor do we receive, accept or participate in any form of bribe. This ensures that we comply with relevant international standards and conventions.

We respect all international trade embargoes without exception. We do not accept anti-competitive conduct, and we publish and validate all relevant financial information in accordance with Danish law.

The obligation to not be a party to corruption or bribery in any form extends to our agents, intermediaries, consultants and others acting on our behalf.

### **Data protection**

SP Group ensures responsible use of IT systems and personal data through efficient personal data protection, robust IT systems and data ethics considerations regarding data use.

Our data ethics efforts are based on five data ethics principles according to which people must be the primary focus so they feel they are in control of their data, the use of personal data must be transparent, and data processing must be carried out in a responsible manner and promote dignity and equality.

### **Tax**

SP Group pays pay tax in all countries in which we have a permanent establishment, thus contributing to sustaining and developing the societies and markets we are a part of. Our Board of Directors has adopted a tax policy which reflects the Group's general ethics and determines that, as a listed company, we have an obligation within the scope of the law to contribute to the society we are a part of.

### **Whistleblower Programme**

In accordance with applicable law, SP Group has established a whistleblower programme allowing any person affiliated with the Group to report in confidence any suspected non-compliance with SP Group's policies and guidelines, laws and regulations as well as any other serious concerns.

Reports to the whistleblower programme go directly to the chairman of SP Group's audit committee, who is an independent shareholder-elected member of SP Group's Board of Directors. Managers and employees of SP Group cannot access such reports.

### **Monitoring and reporting**

We document any matters of significance when it comes to CSR and our environmental, social and financial impact. Once a year, we provide CSR-related information in our group annual report, which thus constitutes our reporting on corporate social responsibility in accordance

with sections 99 a, 99 b, 99 c and 107 d of the Danish Financial Statements Act and our Communication on Progress (COP) report for the UN Global Compact.

### **CSR organisation**

The Board of Directors has the overall responsibility for our CSR activities. The Board oversees the overall strategy and approves policies and reports. The chairman of the audit committee is responsible for our whistleblower hotline and for addressing any complaints. The Group's ESG Manager ensures that all group entities are involved in our CSR efforts and coordinates efforts across the Group.