

## Sustainability Policy

Ver. 2437

### 1.0 Introduction

At Lemvigh-Müller, we equate sustainability with taking responsibility for the impacts we may have on people and the environment.

Our approach to sustainability is largely driven by our customer's demands and needs in this area. We believe that improving our sustainability performance is an integral part of responsible business conduct and is foundational to our customers' and our own success.

Our goal is to become the preferred business partner for our suppliers and customers in the industry, construction, and installation sectors, and we wish to be characterized as a responsible, competent, and customer-driven company.

Through this policy, we put into practice our commitments to social, environmental, and economic sustainability. Translating these commitments into successful outcomes depends on the joint efforts of Lemvigh-Müller and our business relationships.

This policy is made operational through our Employee Code of Conduct and Supplier Code of Conduct.

### 2.0 Our commitment

We are committed to following the internationally agreed core principles on human rights, environment, and anti-corruption:

The UN Guiding Principles on Business and Human Rights (UNGPs), which cover social sustainability and The OECD Guidelines for Multinational Enterprises (OECD), which cover environmental and economic sustainability.

This enables us to identify, prevent or mitigate and account for any adverse impacts on human rights, environment, and anti-corruption, which might result from our own activities, or through the operations of our business relationships.

We comply with the laws and other binding obligations wherever we operate. Moreover, we attempt to motivate our employees to become part of our sustainability efforts by communicating openly about them and by educating relevant departments in sustainability.

To prevent or mitigate adverse impacts on human rights, environment, and anti-corruption, we will communicate openly about what we do. If we find ourselves causing or contributing to an actual adverse impact, we will provide access to remedy for affected stakeholders and prevent or mitigate re-occurrence.

We will collect, measure, and analyze data to improve our sustainability performance and our management system continuously and systematically.

## 3.0 Risks, prevention and mitigation

Due diligence and regular impact assessments are an essential part of our sustainability efforts. They enable us to implement appropriate measures to prevent or mitigate adverse impacts on:

- human rights stated in the International Bill of Human Rights, including the core labour rights (ILO's core Labour Standards)
- the environment in relation to areas addressed by the EU Taxonomy, the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement
- corruption, as outlined by the United Nations Convention against Corruption.

The following highlights are the areas that have been recognized as specifically challenging within our industry.

### 3.1 Environment

#### Emissions to air and use of energy

We work actively on reducing our total environmental impact, by offering more environmentally friendly transport solutions and, from a lifecycle perspective, more sustainable products to our customers.

We take steps to reduce our total energy consumption and continuously measure our scope 1, 2 and 3 CO2 emissions and seek out actions to reduce CO2 emissions in our own operations, products and services. Continuous analysis of our environmental data ensures that we have a valid data foundation for our reduction of CO2 emissions throughout the value chain. We also seek out the possibilities to change to more sustainable energy resources and invest in more energy efficient equipment.

#### Resource consumption and waste management

We consider waste a resource - and not just waste. We continuously seek out actions to reduce packaging consumption as much as possible and manage resources, including waste, in a sustainable and circular way. We collaborate with waste management companies and other industry participants to devise methods of improving waste streams and reducing all non-recyclable waste. Ongoing monitoring of resource consumption and analysis of consumption data helps us to ensure that unintended consumption is detected in time and can be remedied.

#### Hazardous Substances

Chemicals, articles or waste containing hazardous substances are handled according to relevant requirements. We provide relevant documentation such as REACH declarations, safety data sheets etc. Our employees are trained in handling and shipping these goods to avoid any damage to health or the environment.

### 3.2 Human Rights

#### Anti-discrimination

At Lemvigh-Müller we are committed to ensure that no employees, suppliers or customers are discriminated against based on their skin color, nationality, age, gender, sexual orientation, ability, religion or political conviction. Through regular impact assessments we maintain our focus on this matter and

always seek ways to improve ourselves. For those purposes we have established a working group that will work towards creating a safe working environment without discrimination.

### **Health and Safety**

It is important to us at Lemvigh-Müller that our employees are as fit and healthy when they leave the company as they were, when they arrived - at the end of each workday as well as when they leave us at the end of their employment. We take our employees' right to health and safety very seriously. We maintain a good physical and mental working environment by regularly assessing our risks of impacts on this human right and develop actions to prevent wearing-down, occupational accidents and absenteeism. We seek to ensure that our health and safety initiatives go beyond the stipulations of legislation and that they are continuously improved. For further information, we refer to our [Health and Safety Policy](#).

### **Right to work**

In Lemvigh-Müller we always ensure that our employees have a signed contract before they start working for us. Our contracts clearly indicate expected working hours, salary, and seniority. We make sure to give our new employees a proper intro process to understand our ways of working, get acquainted with our facilities and meet other colleagues. We make sure that new employees are introduced to our systems depending on job function and ensure that all our employees engage in professional training for specific job functions in order to be able to carry out their professional duties. We ensure the proper guidance, support, and encouragement our employees need, in order to fulfill their potential and achieve a successful career within Lemvigh-Müller, in line with their talents and ambitions. Our contracts clearly indicate conditions for notice of termination and our managers receive proper training on "hiring and firing".

### **Right to privacy**

Lemvigh-Müller ensures that the personal data we record and store are processed fairly and transparently. We process all personal data in accordance with the basic principles of good data processing practices, which ensures that personal data is processed in a legal, fair and transparent manner. The data is solely collected for explicitly stated and legitimate purposes and not further processed in a manner that is incompatible with these purposes. The data that we collect is sufficiently relevant and limited to what may be necessary related to these purposes. It is correct and, if necessary, up to date, only stored for as long as required for these purposes and adequately secured and kept confidential. For further information, we refer to our [Privacy Policy](#).

## **3.3 Anti-corruption**

### **Bribes and facilitation payments**

Lemvigh-Müller has focus on relevant legislation regarding corruption and bribery. Moreover, we have defined our own high, ethical guidelines, which set out a zero-tolerance policy in relation to all aspects of corruption. We continuously ensure that all relevant employees are introduced to our business ethic guidelines with which they are obliged to comply.

We do not allow our employees to pay or receive bribes. All relevant employees of Lemvigh-Müller must complete an e-learning course in order to learn how to deal with possible risks of bribery and corruption. All our employees must get acquainted with both legal requirements and internal ethical guidelines with which they must comply. Our employees are expected to avoid facilitation payments to public authorities.

#### **Gifts, entertainment and personal benefits**

Some of our employees are in position to be invited to various professional and social events. We gladly accept invitations to work-related events to strengthen our relationships with our business partners. However, any participation in events, courses/seminars, work trips and dinners must be agreed upon with the immediate manager. We do not tolerate any employee accepting benefits from our business relationships, which might influence the employees in dealings with such business relationships. As such, we have developed clear guidelines on appropriate dealing with gifts, entertainment, and personal benefits.

#### **Competition law compliance**

Lemvigh-Müller adheres to Danish competition law, which apply to our activities and services. As such, we enable employees, to the extent necessary, to get acquainted with all relevant competition laws. Moreover, we ensure that all agreements and partnerships that Lemvigh-Müller enters, are compliant with such competition laws.

## **4.0 Our expectations to business relationships**

Our business relationships play a significant role in our mission to develop more sustainable and responsible business practices. As such, we expect our collaborators/ business associates to also run their operations in a responsible way and to manage adverse impacts on human rights, environment, and anti-corruption within their business.

We follow applicable regulations wherever we operate. In the same way, we expect our business relationships to keep updated on and follow all applicable national and international laws and regulations and to comply with the international principles for sustainable and responsible business conduct.

Should our business associates become aware of any severe impacts that we are linked to, we expect them to notify us immediately.



Christian Sogaard-Christensen, CEO

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