

Netcompany



Sustainability Policy

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1 INTRODUCTION AND PURPOSE

- 1.1 In Netcompany, we believe that technology makes a real and positive difference to societies, businesses, the environment, and our common future. By leveraging technology and digitalisation responsibly, it is our purpose to contribute to a modern and mature Europe which prioritises democracy, justice, transparency, and social security. Our goal is to empower societies and citizens of Europe to stand independently and strongly, and to lead the way in shaping a better future for all.
- 1.2 Netcompany has been a participant to the UN Global Compact since 2013 from which point we have reported on our sustainability progress every year. Netcompany is committed to continuously improve its sustainability performance following the United Nations Global Compact's principles.
- 1.3 Our sustainability activities are governed through several standards and processes, including our public Code of Conduct, our internal environmental policy, various social policies, and governance policies. Towards our key suppliers and our value chain we aim to promote the same principles of responsible business conduct which we implement with our Supplier Code of Conduct.
- 1.4 We consider our sustainability activities as a continued journey where we can strengthen our contributions and improve our efforts, and every year we report on our sustainability progress in accordance with applicable regulations, commitments made to our customers and through the UN Global Compact's Communication on Progress.

2 ENVIRONMENT

- 2.1 We are committed to reducing Netcompany's climate and other environmental impacts. We maintain ISO 14001 certified management systems in our largest locations, ensuring relevant actions and objectives on environmental aspects, and continuously improving our ways of working.
- 2.2 We collaborate with key business partners to minimise energy consumption and increasingly rely on renewable energy sources for our own operations and for activities taking place at our business partners' premises, such as colocation and co-hosting data centre facilities.
- 2.3 Resources should be managed responsibly, and in our value chain we identify and mitigate risks of improper water management practices, whereas we optimise our waste management processes in our own sites and ensure that by end-of-life our IT hardware is reused or recycled in accordance with industry better-practices and applicable regulations.
- 2.4 Our competencies, experiences and solutions also enable a better environmental performance and outcomes for our clients and the societies they operate in. From climate risk management, over water preservation and to supporting a more circular economy, we partner with both public and private sector leaders to advance environmental progress.

3 SOCIAL

- 3.1 Netcompany wishes to be a positive influence and a responsible player in society, both when it comes to our employees and the way the solutions we deliver affect the societies we operate in.
- 3.2 We educate people digitally and strive within our own ranks to be market leading in terms of creating a great working environment with respect for the individual and with the aim of establishing a strong learning platform for everyone involved. In Netcompany, we truly believe in investing in IT talent and education to unfold digital capabilities to the benefit of society at large
- 3.3 Our Netcompany Academy is built on principles and experiences that dates to when Netcompany was founded in 2000. Our educational aims are reflected in our core principle of IT-people leading IT-people, which contributes to a profound resource of knowledge that is led down from highly skilled and experienced IT personnel to new generations of IT talents.
- 3.4 Netcompany recognises the importance of diversity, equity, and inclusion at all organisational levels and is greatly invested in attracting, in particular, more women to the tech and IT industry. Our continued effort in this regard includes, among others, to raise public awareness, collaborate with educational institutions, and promote an organisational culture where we trust and respect each other as peers and as team members. We work towards an increase of women in managing positions, and we continuously seek to improve our efforts in this matter.

- 3.5 With a history and deep roots in the digital infrastructures at both national and EU levels, we have for many years played a key role in showing how digitisation contributes to a more prosperous and sustainable future. From child-, housing-, and unemployment benefits, to information and self-service facilities within healthcare, social welfare and the educational sector, we enable our clients to have a significant positive impact on societies, and support them in ensuring data privacy and the right accessibility of their final solutions.
- 3.6 In Netcompany, we see the value of all human beings regardless of age, gender, and social status. Everyone deserves to be treated with respect and we condemn all use of child labour, slavery, human trafficking, or any other form of forced or compulsory labour. For the same reason, Netcompany has embedded the principles of the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and relevant ILO Conventions through the implementation of appropriate policies including our Code of Conduct, and a Whistleblower System, where knowledge or suspicions of serious breaches and violations of EU law may be reported anonymously and without fear of retaliation.

4 GOVERNANCE

- 4.1 Transparency is a vital part of any trustworthy relationship, and in Netcompany we understand the importance hereof. This goes for both our relationship with our customers, business partners, investors and capital markets, and society at large.
- 4.2 We are committed to pursuing a strong company culture and we have a two-tier management structure consisting of a Board of Directors and Executive Management in accordance with applicable recommendations on corporate governance, which ensures accountability and responsibility throughout the top management of the company.
- 4.3 We operate in compliance with applicable laws and recommendations on corporate governance throughout the organisation and we have implemented an Anti-bribery and Anti-corruption Policy along with our Code of Conduct, stipulating several guidelines on our ways of doing business in an ethical manner and with a solid moral foundation, which we believe is key in securing Netcompany's sustainability over time.
- 4.4 We have implemented a Whistleblower System through an external law firm, where anyone may file a report if they are aware of, or suspect, any breaches or violations.

5 ACCOUNTABILITY

- 5.1 Our sustainability initiatives are integrated into our daily operations, including ISO management systems, and reporting is organisationally anchored in Group Finance who report directly to the Executive Management and provide quarterly and annual reporting to the Audit Committee and the Board of Directors.

6 REVIEW AND AMENDMENT

- 6.1 The Board of Directors shall annually review, and if relevant update, this Policy.

7 PUBLICATION

- 7.1 The Policy is published on Netcompany's website and internally.

Latest review and approval by the Board of Directors of Netcompany Group on 11 December 2025.