

NETCOMPANY GROUP A/S – CVR NO.: 39 48 89 14

ESG POLICY

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netcompany

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1 Introduction and purpose

Netcompany's vision is to become the leading digital vendor and digital enabler in Northern Europe by accommodating and accelerating digital transformation for public and private enterprises, so that we may support the development of a strong and sustainable world with successful and competitive businesses, a better environment and overall – better lives for us all.

In Netcompany we understand that all transformation starts from within. Focussing on the areas of Environment, Social and Governance (“ESG”) we truly believe that we can be a positive influence in society, and we have therefore also chosen to report on our ESG activities, ensuring a solid framework for our continued efforts on improving our environmental and social impact for the better.

Our ESG activities are governed through several documents and processes, including our Code of Conduct, Anti-slavery Policy, Anti-bribery and Anti-corruption Policy, Environment Policy, Tax Policy, our Security Policy and Employee Handbook, as well as in the everyday management of the company.

In Netcompany we are deeply invested in contributing to the continuous development of our society by ensuring that both public and private institutions embrace digitalisation, thereby creating an even better and more valuable everyday life for everyone.

We see our ESG activities as a continued journey where we can strengthen our contributions and improve our efforts, as well as strengthen our internal ESG management by creating an even stronger link between strategy, objectives and activities ultimately ensuring Netcompany's continued sustainability in the future.

2 UN Global Compact

Since 2013, Netcompany has been signed up to the UN Global Compact for companies' work with corporate and social responsibility supporting the political efforts towards a more sustainable and greener tomorrow. In Netcompany, we are highly committed to continuously improve our sustainability performance and follow the United Nations Global Compact's principles, just as we are committed to work towards the fulfilment of the UN sustainable goals (SDGs), so that we may make a positive contribution to the world.

3 Following Nasdaq's guidelines and recommendations

The value of a company can no longer be based solely on the company's financial statements, as the interest for overall sustainability is continuously increasing for both investors and society at large. In order to create a meaningful comparison between companies on their ESG activities Nasdaq has issued a guide on ESG reporting, hereunder some proposed ESG key figures, which Netcompany has chosen to follow in a way that is representative to Netcompany as a company. In this regard, Netcompany has also chosen to report on some additional key figures.

Netcompany's reporting on the company's ESG key figures and activities is both included in Netcompany's annual ESG report and financial report.

4 Contributing to strong and sustainable societies

The IT industry possesses the ability and potential to transform the world by introducing new technologies and solutions to the market that will not only revolutionise our way of thinking but also our way of doing business, unleashing resources that was not previously possible.

Netcompany is immensely proud to be a part of this digital transformation through the many IT solutions that Netcompany has helped develop over the years and is continuously developing for both the public and private sector.

Through our digital solutions we want to contribute to the formation of a solid and reliable digital foundation for society to operate in and it is our continuous ambition to deliver some of the most society critical administrative systems and complex IT solutions available on the market, so that our customers may optimise their workflows and internal procedures to the most effective administration of their business' to the benefit of us all.

5 Environment

In comparison to the production industry, Netcompany does not have the biggest climate impact, since Netcompany is an IT service company primarily based on the use of labour forces. However, in Netcompany we do not wish to use this as an excuse for not doing everything that is in our power to reduce our environmental footprint, as we are all troubled by the current development of the world climate.

We are therefore also deeply committed in reducing Netcompany's climate impact, which is why we have implemented an Environment Policy and several procedures and initiatives that are all intended to reduce the company's overall GHG emissions and resource consumption.

We have a strong and dedicated ambition to keep energy consumption as low as possible when operating IT systems, and as part of our Environment Policy and procedures, we continuously monitor and update our daily operations to utilise modern power saving infrastructures both in terms of overall energy consumption and sources of energy.

Netcompany's environmental stance is not only reflected in our own initiatives, but also in Netcompany's business where we always seek to employ green and sustainable solutions, so that our customers may also reduce their own climate impact.

6 Social

Netcompany wishes to be a positive influence and a responsible player in society, both when it comes to our employees and the way our solutions affect the societies, we operate in.

Being a large employer we are a vital part of educating people digitally and we always 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 and our beliefs are not only shown internally in our own organisation, but also externally through our commitment in the project Digital Dogme, which aims to increase and develop digital skills throughout society and across businesses.

We have a unique learning academy that is one of a kind and built on principles and experiences that dates to when Netcompany was founded in 1999. 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. At the same time, our teams grow strong through a fundamental understanding of the complete process of an IT project, a common language and a strong methodology that is embodied throughout the organisation, which also ensures that we deliver within scope and time.

Netcompany recognises the importance of diversity and gender equality at all organisational levels and is greatly invested in attracting, in particular, more women to the tech and IT industry. Our continued efforts in this regard includes, among others, raise of public awareness, collaborations with educational institutions and social events, just as we generally seek to promote an organisational culture where we trust and respect each other as peers and as team members.

In regard to our solutions, we always strive to ensure that the services they deliver are correct, timely and reliable so that we may all trust the many actors that play a part of our society; this goes for both public monetary services like child, housing-, and unemployment benefits but also information and self-service facilities within healthcare, social welfare and the educational sector, as well as the private sector.

In Netcompany, we see the value of all human beings regardless of age, gender and social status. We all deserve to be treated with respect and basic human decency, which is why Netcompany also firmly denounces all use of child labour, human trafficking or any other form of forced or compulsory labour. We all have a moral responsibility to ensure a secure environment for those who may not always be able to speak up for themselves. For the same reason, Netcompany follows the United Nations' Declaration of Human Rights, just as we have implemented policies regarding Anti-slavery, our general Code of Conduct and a whistle-blower system, where knowledge or suspicions of violations may be reported anonymously and without fear of repercussions.

7 Governance

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, company stakeholders and society at large.

Netcompany has a two-tier management structure consisting of a Board of Directors and Executive Management, which ensures accountability and responsibility throughout the top management of the company.

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.

Our Remuneration Policy embodies our core values of fair and equal wages with due consideration to market standards and the overall situation of the company.

It is important to Netcompany to work towards an increase of women in top managing positions, and we continuously seek to improve our efforts in this matter, among others, through participation in public debates and through our overall promotion of more females within the IT industry, since the lack of females is a current challenge to the achievement of our ambitions within this field.

We always seek to minimise the risk of discrepancies between our values, internal guidelines and daily operations of the company. Therefore, we have also implemented a whistle-blower system through an external law firm, where anyone may file a report if they are aware of or suspects any discordances. That way we may uphold Netcompany's position as a responsible player in society throughout.

8 ESG ownership and operations

Our ESG initiatives and reporting is organisationally anchored in Communications and Legal. An ESG steering group (reporting to the Executive Management) has been established to facilitate and ensure Netcompany's continued efforts within the scope of ESG.

9 Reporting

Starting from 2020, Netcompany will annually report on the company's ESG key figures and activities following the guidelines and recommendations from Nasdaq, adapted to Netcompany's business so it may depict the company in the most precise and complete way possible.

The ESG report will include Netcompany Group A/S' statutory statement on corporate social responsibility pursuant to section 99(a) of the Danish Financial Statements Act, as well as Netcompany Group A/S' and Netcompany A/S' statutory statement on the underrepresented gender pursuant to section 99(b). Netcompany Group A/S' reporting on Communication on Progress in relation to the principles of the UN Global Compact will also be included in the ESG report.

Netcompany, Copenhagen, February 2020