

CSR Policy

Commitment Of Nordlux

Nordlux is committed to seeking to prevent, address and mitigate adverse impacts on the basic principles for social (human rights including labour rights), environmental, and economic (anti-corruption) sustainability. Our Policy Commitment covers all three areas.

Our CSR Policy Commitment refers to our company values "IDEA" (Integrity, Dynamic, Excitement, Always) and is a valuable tool used to reach the Nordlux vision. To lead the way, we have chosen the three, for us, most important and relevant UN Sustainable Development Goals:

- 3. Good health and wellbeing
- 7. Affordable and clean energy
- 12. Responsible consumption and production

It also refers to international endorsed principles for sustainable development:

- The International Bill of Human Rights, including the core labour rights from the ILO declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development
- UN Convention against Corruption.

We are committed to seeking to prevent, address, and mitigate adverse impacts on all areas, as set forth in the UN Guiding Principles on Business and Human Rights (UNGPs, 2011) and implemented in the OECD Guidelines for Multinational Enterprises (2011). Other additional policies and procedures for Nordlux will be aligned with this CSR Policy Commitment.



Internal Actions And Expectations

Our CSR Policy Commitment applies to the entire Nordlux group and all our activities. We will, at any time and place, establish processes that enable us to identify, prevent, and mitigate potential adverse impacts that we are contributing to through activities within our business. If we find that we are causing or contributing to any actual adverse impacts, we will support remediation for the affected stakeholders and/or notify the relevant authorities. We expect of our employees that they assist us in meeting our responsibility.

We will support capacity-building for our employees on human rights, environmental sustainability, and anti-corruption, and educate them on how to support the work of addressing potential adverse impacts. If any of our employees identify potential or actual adverse impacts, we expect them to inform the management about the identified issue.

Annually, we will communicate in our financial report about our sustainability improvements and describe how we are addressing adverse impacts that we possibly could cause, contribute to, or be directly linked to. Before making any major changes to our existing activities we will identify the potential adverse impacts on the three mentioned areas (social, environmental, and economic sustainability).

Business Relationships

For us to meet our responsibilities in the best possible manner, we expect from our business partners (including suppliers and sub-suppliers) that they carry out due diligence processes where necessary. Thereby meaning that they must identify, prevent, and mitigate any adverse impacts on human rights, environment, and anti-corruption.

Our collaboration with our suppliers is based on our Code of Conduct, which refers to the UNGPs and defines the minimum expectation that we and our business partners need to be compliant with. The Nordlux Code of Conduct sets the framework for how we cooperate with our business partners on enabling them to live up to their responsibility and meet the international minimum standard.

If we find that our business partners are not addressing their adverse impacts, we will use our leverage to push the specific entity in the right direction and to start taking on its responsibility. We expect all our business partners to immediately notify us, if they find out about any adverse impact that they are causing, contributing to, or linked to – and we expect them to seek to prevent and mitigate their reoccurrence.

Adverse Impact And National Laws And Regulations

We take for granted that Nordlux and our business partners are compliant with national laws and regulations. We distinguish between being compliant with laws and regulations in any given jurisdiction and establishing and conducting management processes for due diligence on the mentioned sustainability areas. By establishing such due diligence processes, Nordlux and our business partners will be able to address challenges before they become severe issues and law violations.

Should National laws and regulations, in exceptional cases, impose Nordlux or our business partners to cause or contribute to adverse impacts, we will seek to conduct due diligence in accordance with the sustainability principles without violating such laws and regulations.

Grievance Mechanism

Nordlux appreciates and respects honest and open communication, and therefore all stakeholders, including employees, have the possibility to ask questions or report any potential or actual negative impacts to our anonymous grievance mechanism. Reporting can be done via this link: <https://whistleblowersoftware.com/secure/979be577-fe11-4af6-a5f5-6c1cff6ab5e8>.

We are committed to investigating all such reports and taking appropriate measures when needed. Employees who report about any such negative impacts will not be subject to any reprisals, and we are committed to monitoring and handling all potential complaints immediately.

Evaluation

This CSR policy commitment will continuously be updated, and shared in our organization, in order to support the implementation. The implementation and effectiveness will also be evaluated annually by the management to secure that Nordlux is meeting its responsibility and the minimum expectation from the UN and the OECD.



Nordlux CEO, Niels Jakobsen

Aalborg, December 2022