

Sustainability Policy

Sustainability Policy

Public

1 Purpose

The purpose of this policy is to describe NG Nordic's approach to sustainability and responsibilities issued by the NG Nordic Executive Leadership Team (ELT) and approved by the Board of Directors (BoD).

This policy is built upon our *Code of Conduct*, which addresses some of the material sustainability topics related to social and governance issues both in NG Nordic's operations and value chain.

2 Scope

This Sustainability policy applies to all wholly owned NG Nordic companies and subsidiaries in which the NG Nordic holds more than 50% of the voting rights. All NG Nordic employees and external persons working for NG Nordic are expected to comply with this Sustainability policy.

3 Policy Statement

NG Nordic's executive leadership endorses this Sustainability policy and commits to providing the necessary resources, visibility and support to implement and enforce it across the organization.

NG Nordic's mission is to contribute towards stopping the pollution of our planet, protecting ecosystems and human health, decarbonizing society, and providing access to sustainable raw materials. Sustainability is an integral part of our business strategy, influencing decisions and operations. NG Nordic has a holistic approach towards sustainability, incorporating material ESG topics:

- fostering a safe and inclusive workplace for employees
- ensuring fundamental human rights and decent working conditions as well as responsible business practice in value chains
- reducing the pressure on natural resources through decarbonization
- transforming waste to valuable raw materials and energy
- securing safe and efficient decontamination and treatment of hazardous substances and non-recoverable waste

NG Nordic aim to create sustainable value for all stakeholders and the communities in which we operate.

3.1 Approach and integration

NG Nordic is a leading Nordic provider of circular solutions and environmental services, tackling the urgent challenges of climate change and resource scarcity. By transforming waste into valuable resources and removing hazardous substances from circulation, NG Nordic is contributing to avoiding emissions and protecting natural ecosystems. Our impact objectives are related to the following six topic areas:

- **Pollution prevention:** Removing hazardous substances from circulation to protect public health and ecosystems, and to enable environmentally safe circular systems.
- **Circular economy:** Enabling access to recycled materials, helping to tackle resource scarcity and reduce GHG emissions.
- **Decarbonize society:** Contributing to climate mitigation through decarbonizing own operations and our customers' footprint.
- **Safe operations:** Our vision is to have zero serious injuries. We continuously strengthen our safety culture, so every employee returns home safely - every day.
- **Committed workforce:** Establish NG Nordic as a great place to work. Ensuring we attract, engage and retain the talent needed to deliver our strategy and take pride in contributing to NG Nordic's impact and success.
- **Responsible business practices:** Responsible business practices in our operations and value chain through promoting decent working conditions, anti-corruption practices, respecting human rights and the environment.

NG Nordic's approach to sustainability covers environment, social and governance aspects with related ambitions and targets. Performance is reported to the Group's Board of Directors (BoD) on a quarterly basis together with financial reporting. The Group Chief Impact Officer (CIO) oversees sustainability, and the BoD and CEO regularly receive updates on sustainability performance.

3.2 Approach to Climate material topics

NG Nordic is committed to climate action and reducing greenhouse gas emissions from operations and supply chain. Contribution to climate mitigation is through decarbonization efforts of own operations and in the value chain by integrating sustainability into procurement decisions. Through enabling material recycling, NG Nordic provides access to materials with a lower CO₂ intensity than virgin materials. In addition, NG Nordic contributes to avoided emissions by reducing the pressure on natural resources by making recycled raw materials available.

The impacts of physical climate change and policies to mitigate climate change affect NG Nordic and its operations. NG Nordic strives to assess and manage the impact of climate risks and dependencies and comply with the relevant guidance to meet stakeholders' expectations.

3.3 Approach to Environmental Responsibilities

NG Nordic acknowledges that its activities have an impact on the environment, nature and climate. Managing the environmental footprint of operations is an integral part of operations and permits. NG Nordic monitors treated waste volumes and emissions to air, water, and land, as well as noise pollution where relevant. Regular assessments and updates on environmental management procedures ensure alignment with regulatory requirements. To ensure continuous operations in accordance with permits, NG Nordic must regularly conduct conformity assessments.

3.4 Approach to Social Responsibility

Safety: The safety and well-being of employees and partners are paramount and an integral part of NG Nordic's business activities. NG Nordic never compromises on safety. NG Nordic has a zero-incident vision, and protecting the health and safety of NG Nordic employees is a top priority. We strive to provide a safe working environment and aim to reduce injuries through continuous improvement of safety protocols.

Diversity, equity and inclusion: NG Nordic promotes a diverse and inclusive workplace. NG Nordic focus on increasing the representation of women in leadership and specialist roles, fostering an environment where all employees can thrive.

Human rights & decent working conditions: NG Nordic respects universal human rights and will take care to avoid becoming involved in violations of human rights. NG Nordic's value chain is exposed to social risks such as violations of decent working conditions, forced and child labor. NG Nordic performs regular audits of high-risk partners in the value chain to ensure compliance with ethical standards and the UN Global Compact's ten principles. NG Nordic prohibits all forms of forced labor, child labor and discrimination in own operations and in the value chain. All employees, contractors and subcontractors who act or perform work on NG Nordic's behalf shall be treated with respect, given decent working conditions and have equal opportunities to develop themselves.

3.5 Governance Commitment

NG Nordic maintains high standards of integrity and ethics in all business dealings and has zero tolerance for corruption and unfair competition.

NG Nordic is committed to adhering to all applicable legal and regulatory obligations in all operating countries. We conduct business within the framework of applicable laws, the *Code of Conduct* and internal policies and guidelines. NG Nordic must always act in accordance with the legislation in each country it operates within. When the *Code of Conduct* sets standards that are higher than national legislation, the *Code of Conduct* applies if the standards do not conflict with national laws.

NG Nordic is committed to upholding the highest standards of integrity and ethical business conduct, as well as good corporate governance. NG Nordic conducts business with integrity, ensuring transparency in all dealings and maintaining a fair competitive environment. The standards and requirements for employees and business partners are set out in the *Code of Conduct* and the *Code of Conduct for*

Business Partners respectively. In addition, there is a set of governing principles that apply to all NG Nordic companies, available in NG Nordic's internal quality management system. Further, all NG Nordic companies are obliged to implement, if needed, additional policies which provide more detailed guidance and requirements for expected business conduct.

4 Responsibilities

Responsible function for support and implementation of this policy

The Group Impact function is responsible for governance processes and management practices for developing, guiding and supporting the implementation of this policy. It is also responsible for:

- Serving as a center of excellence to represent the Group's sustainability approach
- Supporting the Business Platforms in implementing the policy
- Ensuring compliance with legal requirements
- Meeting all stakeholders' expectations on ESG topics to position NG Nordic for long-term value creation
- Engaging with authorities to promote NG Nordic's issues within environmental, social and governance sustainability matters.

Other key roles and responsibilities

- **Chief Impact Officer (CIO)** is the owner of this sustainability policy, ensuring alignment with NG Nordic's strategy and policy enforcement across the organization.
- **Business Platforms' CEO and / or Platform Impact Manager** define platform-specific sustainability targets and action plans to support the achievement of group-level targets. It is the responsibility of the platform CEO or Impact Manager to ensure the following:
 - Embed the principles of this policy into business goals and processes
 - Communicate the principles to all employees and relevant stakeholders
 - Ensure relevant training of employees and contracted workers
 - Ensure compliance in their organization
 - Report on sustainability performance monthly, quarterly or annually (depending on the target)
 - Communicate risks to the Group Impact function
- **NG Nordic's Board of Directors (BoD)** are ultimately accountable for sustainability/ESG and impact at NG. The BoD approves this sustainability policy as well as Group-level sustainability targets that guide annual business planning within the platforms and Group companies. It also monitors the Group's material sustainability risks and closely follows the Group's sustainability performance and reporting.
- **NG Nordic's Executive Leadership Team (ELT)** is responsible for setting sustainability and environmental targets that guide annual business planning within the platforms and Group companies. The ELT also monitors sustainability performance and impact reporting on a monthly, quarterly or annual basis, depending on target.

- NG Nordic's Chief Executive Officer (CEO) is responsible for sustainability governance, allocating sufficient resources to fulfil the requirements of this policy and mitigating related risks.
- **Line managers** should:
 - Demonstrate leadership and proactive commitment to NG Nordic Sustainability position.
 - Align efforts with the current sustainability strategy.
 - Inform/consult the relevant group staff functions on relevant risks and issues.
 - All managers and superiors are responsible for implementing and controlling sustainability management and performance within their respective responsibility areas.
- All employees and external persons working for NG Nordic have the responsibility to comply with this sustainability policy, the NG Nordic *Code of Conduct*, and related laws, regulations and instructions.

5 Review cycle

Group Sustainability is responsible for ensuring that this policy and underlying group procedures are evaluated at least every three years or within a shorter interval on an as-needed basis depending on developments within the NG Nordic and its operating environment. This policy is reviewed by the Executive Leadership Team and any amendments to this policy are approved by the Board of Directors.

6 References

Other publicly available key policies

- *Code of Conduct*
- *Code of Conduct for NG Nordic's Business Partners*
- *HSSEQ Policy*
- *People Policy*

Code of Conduct



Code of Conduct for NG Nordic's Business Partners

