

Issue	CR Policy
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Responsible	Nicolaj Ulmits
Approved	Group Executive Management
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Redegørelsen udgør samtidig en bestanddel af ledelsesberetningen i virksomhedens årsrapport 2021*

*Statutory report on social responsibility, pursuant to årsregnskabsloven § 99a
The report is also part of the management report of the company's annual report 2021*

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OPENING

By this policy GPV Group declares that we intend to meet a wide range of Corporate Responsibility (CR). As of 2018 the title of this policy has changed from Corporate Social Responsibility (CSR) to Corporate Responsibility (CR). This reflects that GPV consider responsibility and sustainability to go beyond the social elements.

The policy underlies the targets set by the executive management. The results achieved during the past year as well as effort for the coming year will appear from the annual follow up on agreed KPIs and their annual targets.

This policy requires as a minimum to fulfil the principles contained in

- TLS 8001 (Thai Labour Standard)
- UN Global Compact.

1. ABOUT GPV

1.1. Business and operating principles

GPV is a knowledge based outsourcing partner with specialist capabilities within high technology and complex manufacturing.

GPV is a global EMS-partner specialised within high-mix/low-medium volume EMS with more than 60 years of experience and industry insights. We help our customers realize their accomplishments and competitive position through superior technological know-how.

Our more than 3.700 employees deliver electronics manufacturing, in-house mechanics, cable-harness and box-build, from our production sites in Europe, Asia and the Americas. GPV is founded in Denmark and with Danish headquarters. We comply with local legislation in the countries in which we operate.

1.2. Code of Conduct

The GPV Group is dedicated to being a responsible employer and a good corporate citizen. The Code of Conduct represents our core values and reflects our continued commitment to ethical business practices and regulatory compliance.

The Code of Conduct for Employees applies to all employees of the GPV Group worldwide, and it is the responsibility of Management and all employees to ensure compliance with this Code of Conduct.

In the event of non-compliance, employees are encouraged and expected to give notice to the Executive Board, and they are assured that they will suffer no retaliation or other negative consequences in such case. We take a very serious view of any suspicion of breach of GPV's Code of Conduct, and in any cases of non-compliance with the Code of Conduct, we will act.

2. CORPORATE RESPONSIBILITY (CR)

2.1. Workplace

GPV strive to continually improve our work environment. We aim to strengthen and implement a shared corporate culture which is to help us treat all colleagues equally, regardless of culture, history and tradition. If GPV employees have good working conditions and are committed to their work, together we can do the best job possible.

- **Diversity**
In GPV we aim to place the right people in the right job. We are looking for competencies to fill in a certain job regardless of religion, culture, ethnicity, etc.
- **Training and development initiatives**
It is our aim to provide our colleagues with continuous and relevant education and training.
- **Working hours**
In GPV the number of working hours lives up to the local labour legislation. In situations where law or agreements claim overtime pay or other kind of nuisance bonus, it will be paid.

2.2. Health, Safety and Environment (HSE)

GPV ensures that production in all phases of the supply chain is planned and organized to promote a safe, healthy and responsible working environment. The purpose is to avoid accidents and to ensure that the physical and mental condition of the employees does not deteriorate.

The work at GPV is carried out in accordance with the following principles:

- Risks are controlled and managed at the source
- To the extent commercial feasible, the work is adjusted to fit the individual employee in terms of equipment, as well as work and production methods
- Monotonous work is limited to minimize its impact on the employee's health
- No work methods constitute danger to the employees

GPV makes every effort to ensure that our processes are safe and that high-quality standards are maintained throughout the entire supply chain, from incoming raw material to finished goods.

GPV makes every effort to ensure that no employee suffers physical or psychological harm at work.

In terms of prevention of work accidents, the responsible unit management must notify any Lost Time Injury (LTI) to the CEO within 24 hours, and within 48 hours an investigation result for discussion to avoid similar incidents in the future must be presented.

2.2.1. Health

It is important to GPV to have healthy employees. GPV ensures that efforts to improve the general health are part of the GPV way to act.

GPV helps improving the health of its employees by improving the work environment with initiatives targeting an improved well-being.

2.2.2. Environment and sustainability

In the production there is a risk of environmental impact by discharging substances into the air, the ground and the water. GPV has no explicit policy to reduce our effects on the climate, but we constantly strive at reducing energy- and water-consumption and focus on recycling of waste materials. GPV complies with all applicable laws and regulations, and our aim is to contribute to sustainable development by focusing on

- Employees
- Environment
- Quality

GPV is ISO 14001 certified which means that we continuously work determinedly and systematically to improve the environment. Every year GPV is evaluated by external auditors.

2.3. Quality

GPV ensures that our suppliers show respect of high product quality and of the environment. GPV inspects and audits significant suppliers at least once a year and visits suppliers with low performance.

Internal quality conditions comply with the industry's highest standards to live up to the terms of the quality certificates GPV has achieved. These certificates are given in the CR report's data sheet.

3. RESPECT OF OTHER PEOPLE, CULTURES & EQUAL EMPLOYMENT OPPORTUNITIES

Regardless of the country in which we operate, we maintain that the human rights of every individual should be respected and upheld.

3.1 Discrimination

All GPV employees must show respect of the values and cultures of the people with whom GPV works - both internally and externally. As a natural consequence, GPV prohibits discrimination on the basis of sex, race, colour of skin, religion and beliefs, political opinion, sexual orientation, age, handicap or national, social and ethnic origins.

GPV ensures that we do not discriminate when hiring, moving, promoting or dismissing employees, or in connection with pay reviews, training and development or other working conditions. All these elements are based on relevant and objective criteria.

3.2. Freedom of association

GPV does not interfere with the employees' choice of union or other association and respects the employees' right to organise and enter into collective bargaining.

3.3. Child labour

GPV does not accept child labour. GPV is aware of and respects the ban against child labour as expressed in EU Directive 94/33/EC of 22 June 1994 on the protection of young people in the workplace, the UN Convention on Economic, Social and Cultural Rights of 16 December 1966, ILO Convention No. 138 of 26 June 1973 on Minimum Age, ILO Convention No. 182 of 17 June 1999 on the Worst Forms of Child Labour as well as the UN Convention on the Rights of the Child of 20 November 1989.

4. CORRUPTION

As a global company GPV is exposed in Asia, Europe and the Americas - and thereby in different cultures. Each culture has different attitudes towards doing business. As expressed in our Code of Conduct, we pride ourselves of acting credibly and with integrity in all of our operations, and we do not accept or offer bribes.

5. EXTERNAL RELATIONS

5.1. Community relations

GPV is aware of and observes all applicable laws, rules and regulations in the various countries in which we operate. GPV is responsible for understanding these laws, rules and regulations and how they apply to our business and jobs, and for preventing, detecting and reporting instances of non-compliance to the relevant individuals, institutions or authorities.

5.2. Suppliers and collaborators

GPV sources raw materials in different countries. Our ambition is for our suppliers to meet our Supplier Code of Conduct which governs ethical, social and environmental responsibilities. It is essential that customers trust us if we are to sell our products. By acting responsibly, communicating openly and maintaining an on-going dialogue with customers, we create the right conditions for trust.

GPV has a set of ethical guidelines for all colleagues with external supplier relationships (see section 1.2. Code of Conduct)

6. IMPLEMENTATION

A number of the above-mentioned issues are implemented by the guidelines established by the management and with flow-down to the single management teams in each entity and department. Further GPV code of conduct has been signed by all relevant employees in the organisation. Others are implemented by concrete action plans and ongoing measuring with quarterly follow-up.

As regards to discrimination, child labor, freedom of association and corruption these issues are met to the extent it is possible from the current knowledge. If suspicion appears to the management that any of this is violated, this will be investigated promptly.

On an annual basis an evaluation of the collection of measures take place and targets for the focus areas for the coming year are set by the group management. Data on all measures are collected from each entity to evaluate the progress and eventually initiate corrective actions.

KPIs of various ESG measures are periodically evaluated by Top Management together with local management teams on the so called "Business Improvement Meetings".

6.1 General and extraordinary CR Activities 2021

Beyond the ongoing measuring of fact and figures, we are working with a number of initiatives within corporate responsibility, with the aim to participate as an active player in the communities where GPV is operating.

As previous year local GPV sites have again in 2021 offered donations for charity projects in Thailand, Sri Lanka and Mexico.

In many areas, 2021 has been a special year for GPV. Challenges with the availability of raw materials as well as pressure on supply chains and logistics have characterized everyday life. In the period 2016-2020, GPV has created great results within the ESG area, and during 2021, ambitious goals have been set. GPV therefore now presents three strong 2030 ambitions based on the basic principle DoMoreWithLess:

More renewable energy – Less resource consumptions

Reduce GHG emission intensity from scope 1+2 with 50%

More focus on the next generation – Less poverty

Develop KPI for community engagement and poverty effect

More capacity utilization – Less waste

Develop KPI for Capacity utilisation (OEE)

6.2 Working Environment

In 2021 our management systems were certified on three production units according to the working environment standard ISO 45001. This also means that all production units in GPV are now certified according to the working environment management standard and that wherever in the world production is, there is now documentation for, that the production complies with strict safety and environmental requirements. Despite this work, the frequency of work accidents increased slightly from 2020 to 2021. This has led to preventive initiatives to detect near misses and increase preventive actions. This is necessary as the very ambitious target is to achieve a work accident rate below 1 in 2025. Also 2021 has been influenced by the global COVID-19 pandemic. Continuous actions has been taken to ensure a safe and healthy working environment. All sites follow the governmental COVID-19 restrictions e.g. wearing face masks, hand disinfection, observance of distances and notice board information.

6.3 Human Rights

In the field of human rights, the overall risk assessment has been updated. This has not changed in the overall picture, where our primary focus is on production units in Sri Lanka, Thailand and Mexico. At these production units, extra attention is paid to fundamental human rights, the ILO conventions, and compliance with local law. We will continue to be a good place to work and all employees must be ensured good and proper conditions. Going forward, further work will be done within the social area to concretize new initiatives and ambitions.

6.4 Corruption, Anti Bribery and Business Ethics

To further anchor the understanding of GPVs business ethics with regards to Anti bribery we continue training new white-collar employees on a monthly basis.

6.5 Environmental Issues

The 2030 ambitions within environmental issues are defined within the following headlines

- **More renewable energy – Less resource consumption**
Reduce GHG emission intensity from scope 1+2 with 50%
- **More focus on the next generation – Less poverty**
Develop KPI for community engagement and poverty effect
- **More capacity utilization – Less waste**
Develop KPI for Capacity utilization (OEE)

6.6 Gender Composition

The actual gender composition among the management level (employee responsible) shows a distribution of 34 % female / 66% male. Among all employees the gender composition shows a distribution of 61,1% female / 38,9% male

Bo Lybæk
CEO

Henrik Tornbjerg
CFO