



Normec

# 2026 ESG Policy Normec Group

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# ESG Policy Statement

**The Normec Group tests, inspects and certifies so that organizations can innovate and improve safely, quickly and (cost) efficiently. With intelligent, thorough and independent research and reports, we combine subject-matter expertise with excellent IT-driven services. This is how we set the standard. As an independent organization, we ensure the quality and safety of our customers' materials, systems, processes, products and services.**

Based on accredited methods, we conduct tests, inspections and audits. Here we work with organizations, using a clear, efficient process to ensure the sustainable improvement of the company or institution.

Our services are designed to avoid risks. Normec's added value is our commitment to working with clients to actually make improvements in organizations. Normec Group clients can count on detailed insight into quality, efficiency and safety. After all, that is the only basis from which they want to further develop their products and services. That is what we call sustainably better.

At Normec, we recognize that sustainable business practices are essential for ensuring long-term value for our stakeholders and society at large. Our ESG policy reflects our commitment to contributing to a more

sustainable world by minimizing our environmental impact, promoting social progress, and ensuring transparent and ethical governance.

## Our ESG commitment

Normec Group subscribes to the importance of Environmental Social Governance (ESG). We are committed to the interests of our customers, employees, shareholders and the community through practical applications of corporate social responsibility.

### Environmental

We are committed to reducing our ecological footprint and actively contributing to the fight against climate change. By 2040, we aim to achieve carbon neutrality by reducing greenhouse gas emissions, maximizing the use of renewable energy, and integrating circular economy principles into our operations. Additionally, our waste and water management practices will be further optimized to protect and conserve natural resources.

### Social

Our people are our greatest asset. That's why we foster an inclusive work culture that embraces diversity and promotes equal opportunities. By 2027, we aim to achieve diverse representation in leadership positions and will continue to invest in programs that improve employee well-

being. Moreover, we are dedicated to supporting the communities we operate in through volunteering and investments in social initiatives, with a focus on education, health, and sustainability.

### Governance

Transparency, integrity, and accountability are the foundations of our governance policy. We remain committed to ethical business practices and aim for full compliance with regulations and ethical standards. Our anti-corruption practices and governance responsibilities are reinforced through mandatory training for all employees and an annual ESG report that outlines our progress and performance to stakeholders.

### Our ESG Strategy

At Normec, we believe that economic growth must go hand in hand with environmental responsibility, social equity, and strong governance. Our ESG strategy is not just a commitment but a core part of our business operations, enabling us to create sustainable value for future generations.

We have identify our ESG aspects, established a clear ESG policy and related goals, developed and maintained a ESG program and management system, and provided sufficient resources to comply with ESG principles. Management and employees have actively contribute to this.

We will annually review our ESG policy and associated goals to ensure that they are still in line with our vision for the future.

Endorsed by,

*The Normec Group  
Management Board*

## 1

# Introduction

**At Normec, we are committed to creating sustainable value for our stakeholders by integrating environmental responsibility, social progress and good governance into all our business activities. Our ESG policy is designed to minimize our impact on the world, promote equal opportunity, and ensure transparency and ethical leadership.**

## Mission

Our mission is to contribute to a sustainable and fair future by leading our business with responsibility for the environment, society and good governance.

## Vision

We strive to be a leading company that positively impacts the environment, creates value for society, and ensures that our governance practices are transparent and ethical.

## Scope

This policy applies to all employees, including full-time and part-time employees, temporary workers, consultants, freelancers, interns, and all other individuals under contract with the company.

## Objectives

In this document we present the ESG policy and objectives for the period for the coming years

## Monitoring and Review

The progress of our ESG objectives is monitored regularly and the ESG policy is also reviewed periodically:

- **Monitoring:** An internal ESG committee (ESG Group Advisory Counsel) led by the Chief Sustainability Officer (CSO) monitors the implementation of this policy and advises on adjustments.
- **Review:** Adjustments to this ESG policy are made in consultation between the CSO and Chief Operation Officer (COO), adjustments are made on an ad hoc basis with an annual review of the overall ESG policy occurring by default in February of each year.

## Reporting

As part of our commitment to sustainability and transparency, Normec annually presents its ESG Annual Report, prepared in accordance with the Global Reporting Initiative (GRI) Standards. This ESG reports provides a comprehensive account of our environmental, social and governance performance and shows how we are progressing toward our ESG goals.

The goal of this ESG Annual Report is to create value, not only for our shareholders, but also for all of our stakeholders, including customers, employees, communities and the environment. The ESG Annual Report reflects our commitment to accountability for the impact of our operations and our contribution to the United Nations Sustainable Development Goals (SDGs).

# 2

## Organization

**The Normec Group has operations in the Netherlands, Belgium, Germany, France, Switzerland, UK, Ireland, Poland, US, India and Peru. The headquarters is located at the Honthorststaat 3 in Amsterdam. The group consists of four business divisions, consisting of Foodcare (about 20%), Life Safety (about 34%), Sustainability (about 30%) & Healthcare (about 16% of the total).**

### Normec Foodcare

Normec Foodcare takes on projects in the field of quality assurance, laboratory research, taste testing and QA automation within the food industry. In addition, activities include employee education/training, risk management, label control, specification management, auditing and inspection.

### Normec Life Safety

Normec Life Safety takes care of the quality and safety of its customers. This involves a safe physical environment and a sustainably healthy living environment. In doing so, Normec Life Safety relieves its customers in the areas of testing, inspection, certification and compliance. This ensures independent research and clear reports. This involves building, infrastructure and environmental management.

### Normec Sustainability

Normec Sustainability can in turn be divided into two parts,

environmental and certification. The environmental part consists mainly of laboratory activities where tests are performed on building materials, the biodegradability and compostability of products, measuring and analysing emissions to air as well as to water. Certification activities focus on both product and process management systems within the construction and infra industry. But certification of fair labour processes in the chain is also part of the activities. Finally, CO2 emission certification is also carried out in the aviation and maritime sectors.

### Normec Healthcare

Normec Healthcare, although currently the smallest business division, shows a lot of potential. Its activities are currently specialized in providing hospitals with the various areas of expertise, but this division is also a specialist in the field of GxP, by providing engineering, compliance and training activities.

For the ESG policy, all underlying entities are included, consisting of:

- Newton Dutch Bidco BV
- Normec Holdings BV
- Normec 1 BV
- Normec LSE BV
- Normec Foodcare BV

The subsidiaries of the above entities are also in scope of this ESG policy.

# 3

## Governance

### 3.1 Core Values

Growth is the constant at Normec. Since 2016, the way we shape that growth attracts companies and people who agree with our core values. Consequently, these find their basis in GROWTH.

#### Our compass for the future

The GROWTH principles represent a shared vision, offering insight into the heart of what makes us Normec. Together, they act as a compass that guides us in the right direction, orienting us in challenging times and keeping us on course towards the future we wish to create.

Our principles are:

- G** Get It Done
- R** Responsibility and Ownership
- O** Optimism and Energy
- W** Winning through Simplicity
- T** Trust and Teamwork
- H** Harnessing Structure

Beyond simply organizing concepts, this acronym summarizes our philosophy of action, responsibility, positivity, simplicity, collaboration, and strategic alignment. It is a mantra for our current endeavors and aspirations – a formula for turning challenges into achievements and ambitions into realities.



### 3.2 ESG Governance

At Normec, our ESG policy is firmly embedded in our governance structure to ensure that sustainability and social responsibility are integral to all business decisions. The implementation and compliance with our ESG policy are overseen by the Chief Sustainability Officer (CSO), who is a member of the Executive Board and reports directly to the CEO and the Board of Directors.

#### Responsibilities of the Chief Sustainability Officer (CSO)

The CSO holds the overall responsibility for developing, executing, and overseeing Normec's ESG strategy. This position ensures that sustainability is integrated into the company's strategy and decision-making at the highest level. The CSO's key responsibilities include:

- Overseeing the implementation of all environmental, social, and governance initiatives across the organization.
- Coordinating ESG activities with other departments, such as finance, legal, HR, and operations, to promote sustainability throughout the entire value chain.
- Reporting to the Executive Board on the progress of ESG goals and KPIs, as well as producing annual ESG reports in line with Global Reporting Initiative (GRI) standard.
- Identifying opportunities for strategic sustainability partnerships and innovations that create both economic and societal value.

#### ESG Group Advisory Council

The monitoring and oversight of the ESG policy are conducted by the ESG Group Advisory Council. This group comprises internal experts coming from the different departments with diverse disciplines. The ESG Group Advisory Council reports regularly to the CSO and serves as a sounding board for the ongoing development of our ESG strategy.

The key responsibilities of the ESG Group Advisory Council include:

- **Monitoring:** Continuously monitoring the progress of the ESG policy and evaluating whether ESG targets are being met.
- **Advisory Role:** Providing recommendations for improvements to the CSO and the Executive Board based on the latest developments and best practices in ESG management.
- **Evaluation:** Annually reviewing the effectiveness of ESG initiatives and making adjustments to policies and processes as necessary.
- **Stakeholder Engagement:** Assisting in stakeholder engagement, including investors, employees, and communities, to ensure transparent and open communication about ESG performance.

#### ESG Change Champions

To ensure the successful implementation of ESG initiatives at all levels of the organization, Normec has established a network of ESG Change Champions. This group consists of employees from various business units who act as local advocates for the company's sustainability agenda

and assist the CSO in translating ESG initiatives into action across the organization.

The ESG Change Champions play a vital role in driving ESG initiatives locally by:

- **Local Implementation:** Ensuring that ESG initiatives are effectively integrated into day-to-day operations within their respective business units, and promoting awareness and engagement among employees.
- **Accelerating ESG Ambitions:** Actively proposing new ideas and initiatives to the CSO and ESG Advisory Group, aimed at broadening and accelerating the rollout of the company’s ESG ambitions.
- **Grassroots Innovation:** Identifying opportunities for sustainability improvements within their teams and acting as catalysts for positive change, thereby contributing to the overall success of the company’s sustainability strategy.

### Reporting and Accountability

Together, the CSO, the ESG Advisory Group, and the ESG Change Champions ensure that Normec regularly reports on its ESG performance. This includes internal reporting to the Board of Directors as well as external reporting to stakeholders through the company’s annual ESG report. These reports are prepared in accordance with internationally recognized standards, including GRI, to ensure transparency and accountability in our sustainable business practices.



Through the leadership of the CSO, the advisory role of the ESG Advisory Group, and the on-the-ground efforts of the ESG Change Champions, Normec remains committed to achieving its sustainability goals, minimizing risks, and maximizing positive environmental, social, and governance impacts.

### 3.3 Stakeholders

Given the different functionalities of the Normec Group, they deal with a wide variety of stakeholders. These stakeholders determine, to a greater or lesser extent, the level of ambition and prioritization of objectives. In addition to social value, there is also commercial value in taking into account and responding to developments in the market and among clients. See above the main stakeholders of the Normec Group.

# 4

## ESG Strategy

**At Normec, we understand that an effective and integrated approach to ESG (Environmental, Social, Governance) is essential to ensuring our sustainable growth and fulfilling our responsibility to both society and our stakeholders. Our ESG Framework is built around five strategic pillars, which together provide a robust and future-proof ESG strategy.**

### 1 ESG policy

Drafting and implementing **ESG policy** throughout the whole organization.

#### 4.1 ESG Policy

Our ESG policy is more than just a set of guidelines; it is a fundamental part of our business strategy. We strive to embed ESG into all aspects of our business model. This means that every business unit integrates ESG principles into their daily operations, from procurement and production to sales and customer service. By making ESG central to decision-making at both strategic and operational levels, we ensure that sustainability and social responsibility are at the core of everything we do.

To successfully integrate this approach:

- ESG objectives are set for each business unit.
- Employees are actively engaged through

training and awareness programs.

- We monitor business unit performance on ESG metrics, ensuring they contribute to the company's overall goals.

#### 4.2 ESG Governance

Strong governance is critical to the success of our ESG policy. To this end, we have established an ESG governance structure led by the Chief Sustainability Officer (CSO), who is a member of the Executive Board and responsible for driving ESG initiatives across the group. To ensure ESG is also embraced at the local level, we have delegated responsibilities to our regional and local entities.

Each local entity is responsible for:

- Implementing the ESG strategy based on their specific context and challenges.
- Reporting their ESG performance to the central ESG Group Advisory Council and the CSO.
- Developing local initiatives that contribute to the broader ESG goals of the organization.

### 2 ESG governance

Establishing **ESG governance** and solidifying the accountability of the key stakeholders involved.

### 3 Reporting and communication

**Reporting and communication** (internal and external) around ESG-related topics.

This ensures that sustainability is not merely a top-down process but is embedded at every level of the organization.

#### 4.3 Reporting and Communication

Transparency is a cornerstone of our ESG approach. To keep stakeholders informed, we regularly report on our ESG performance. Externally, we focus on sharing detailed ESG information through our annual ESG report, which complies with international reporting standard such as the Global Reporting Initiative (GRI).

Internally, we communicate regularly to raise awareness and engage our employees in ESG initiatives through:

- Internal newsletters on Normec Inside.
- Organising events and training sessions.
- Providing KPI dashboards and tools that allow business units to track and compare their progress on ESG matters.

This ensures that everyone within the organization is engaged and held accountable for achieving ESG targets.

#### 4.4 Assessment and Validation

To ensure that the ESG strategies in place are delivering the desired impact, we conduct regular assessments and validations. This process helps us evaluate whether the actions taken are effective and achieving the expected results.

Our assessments include:

- **Quantitative measurements:** Analyzing KPIs related to environmental impact, such as CO2 emissions, energy consumption, and waste reduction, as well as social KPIs like diversity and working conditions.
- **Qualitative evaluations:** Gathering feedback from internal and external stakeholders on the perception and impact of our ESG initiatives.
- **External audits:** Ensuring that we use independently validated data and meet the required standards, for example an EcoVadis Assessment.

### 4 Assessments and validation

**Assessments and validation** of ESG topics by external parties with the aim of continuously improving our score.

## 5 Legislation and regulations

**Legislation and regulations** surrounding ESG-related topics that Normec faces now and in the coming years.

These ongoing evaluations enable us to make timely adjustments and refine our strategy to achieve the intended outcomes.

### 4.5 Legislation and Regulations

With the continued development of ESG legislation, including European regulations such as the Corporate Sustainability Reporting Directive (CSRD), it is crucial that Normec fully complies with all applicable standards. The CSRD and other regulations impose stricter requirements on ESG reporting and transparency, demanding broader and more detailed information on sustainability performance.

To remain compliant, we have:

- Established procedures to ensure that all our reports and ESG actions comply with regulations in the markets where we operate.
- Regular updates and training for relevant employees on changes in legislation.

Remaining compliant with both national and international ESG standards is not just a legal obligation but a strategic priority that helps strengthen our leadership in sustainability.

### 4.6 Conclusion

Our ESG Framework provides a holistic approach to embedding ESG deeply into our organization, from policy and governance to reporting and regulatory compliance. Through these five strategic pillars, we can create sustainable value for all our stakeholders and contribute to a fairer, greener future.

# 5

## Material topics and Sustainability risks

**As part of our sustainability policy, we conducted a comprehensive ESG materiality analysis. This analysis enables us to identify the most relevant sustainability risks and opportunities for our organization. The goal is to align our strategy with the long-term interests of our stakeholders and contribute to sustainable business practices.**

### 5.1 Normec Pillars

The materiality analysis is based on the following eight strategic pillars:

- **Business Model and Strategy**  
Assessing how our business model and strategy align with sustainable development and future-proofing
- **Environment**  
Addressing our impact on the environment, focusing on climate change, energy use, and sustainable resource management.
- **Diversity, Equality, and Inclusion**  
Promoting an inclusive and diverse work environment, focusing on equality and fair opportunities.
- **Health, Safety, and Wellness**  
Ensuring the physical and mental health and safety of our employees and stakeholders.
- **Employee Development and Engagement**  
Promoting continuous professional development and active involvement of our employees.

- **Business Ethics and Risk Management**  
Maintaining high ethical standards and effectively managing risks that may affect our business activities.
- **Supplier Chain Management**  
Ensuring responsible sourcing and promoting ethical and sustainable practices throughout the supply chain.
- **Corporate Citizenship**  
Fulfilling our role as a responsible corporate citizen that contributes to the well-being of the society and community in which we operate.

These pillars form the basis of our sustainability policy and guide our ESG efforts. We are committed to integrating the findings of the materiality analysis into our broader strategy, and to continuously improve our sustainability and corporate social responsibility responsibilities.

### 5.2 Material Topics and Associated Risks

As a result of our ESG materiality analysis, also using the EcoVadis methodology, we have identified the following material topics and their associated risks. These topics highlight the critical sustainability challenges and opportunities for our business, each accompanied by corresponding risks that are being actively managed as part of our broader ESG strategy.

**1. Environmental services & advocacy**

Encouraging customers to choose the products and services that are better for the environment, or make innovations that reduce the impact on the environment

**2. Energy consumption & GHGs**

Energy consumption in operations as transportation combined with the GHG emissions that this directly but also indirectly results from

**3. Materials, chemicals & waste**

The consumption of materials in the operation as well as the waste resulting from this in, both general waste or hazardous waste

**4. Diversity, equity and inclusion**

Preventing discrimination and harassment (in its broadest form) in the work environment and all related processes

**5. Employee health & safety**

Providing a safe working environment for Normec Group employees, both physical and mental safety taking into account the working conditions of all employees

**6. Working conditions**

Providing the right working conditions allowing all Normec Group employees to live a healthy life with the right work-life balance

**7. Career management & training**

Provide a career plan from recruitment, your career with internal job opportunities (including training) until possible employee leaving

**8. Social dialogue**

Provide the opportunity for social dialogue between employer engagement and employee, allowing employees to freely collectively associate and be represented

**9. Corruption**

Independence and impartiality are important values within Normec Group, which means that no form of corruption is tolerated. This also includes extortion, bribery, conflict of interest, fraud, money laundering

**10 Responsible information management**

Normec Group has access to third party information and securing this data in the context of privacy and IP rights, is of paramount importance to maintain the reputation of Normec Group

**11. Supplier environmental practices**

We are aware that we are part of a supply chain, and imposing the same goals we pursue on environmental issues towards our suppliers ensures better chain accountability

**12. Supplier social practices**

We are aware that we are part of a supply chain, and imposing the same goals that we pursue in terms of socially and corporately responsible issues towards our suppliers ensures better chain accountability

These material topics and risks form the foundation of our ESG strategy, guiding our approach to sustainability and risk management. By addressing these risks proactively, we aim to create long-term value for our stakeholders while contributing to a sustainable future.

Appendix 1 contains an overview linking the Normec Pillars and Material Topics with the Risk element.

# 6

## Commitment to the UN Global Compact

At Normec, we are proud to affirm our commitment to the UN Global Compact and its ten principles, which guide our efforts in promoting responsible business practices across our operations. By aligning our strategies with the Global Compact, we aim to support universal principles in the areas of human rights, labor, environment, and anti-corruption, thereby contributing to a sustainable future for all.

Figure 1: Sustainable Development Goals Overview.



In our dedication to sustainability, we have conducted a thorough analysis of the 17 Sustainable Development Goals (SDGs), engaging in discussions with internal stakeholders to identify our key areas of focus. Through this collaborative process, we have prioritized four SDGs that resonate deeply with our business values and operational impact:



Figure 2: Chosen SDG goals by the Normec Group

### SDG 8: Decent Work and Economic Growth

We strive to foster economic growth and decent work for all our employees. By creating fair and inclusive job opportunities and we aim to enhance productivity.

### SDG 13: Climate Action

Climate change poses a significant threat to our planet. We are dedicated to taking urgent action to combat climate change by reducing greenhouse gas emissions, promoting sustainable practices, and enhancing our resilience to climate-related risks.

### SDG 5: Gender Equality

We recognize the importance of achieving gender equality and empowering all women within our organization. Our initiatives aim to promote diversity and inclusivity at all levels of our workforce.

### SDG 6: Clean Water and Sanitation

Access to clean water and sanitation is fundamental for health and well-being. We are committed to sustainable water management practices and supporting initiatives that enhance water access in communities especially in underdeveloped countries.

These selected and prioritized SDGs align closely with our business objectives and values, serving as the foundation for the measures and actions we have implemented. By integrating these goals into our sustainability framework, we aim to address identified sustainability risks and create positive impacts on society and the environment.

We are committed to continuously evaluating our progress, engaging with our stakeholders, and adapting our strategies to ensure we contribute effectively to these critical global goals. Together, we can work towards a more sustainable and equitable future.

# 7

# Normec Sustainability Goals

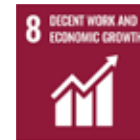
## 7.1 Sustainability Goals and Action Plan

To further enhance our company’s ESG strategy and ensure alignment with our core values and principles, we have integrated the four prioritized United Nations Sustainable Development Goals (SDGs) into six specific Normec Sustainability Goals. These tailored goals are designed to reflect our commitment to responsible business practices while driving positive social, environmental, and economic impact.

In addition, we have expanded these goals by setting quantitative targets. By incorporating measurable objectives, we are able to track our progress more effectively and ensure accountability in meeting our sustainability commitments. These quantitative targets enable us to focus on tangible outcomes and continuously improve our performance in key areas of ESG.

By translating the global SDGs into actionable and relevant targets for our organization, and by backing these targets with clear metrics, we are able to focus on areas where we can have the greatest influence. This not only strengthens our ESG strategy but also ensures that we remain true to our corporate values as we contribute to a sustainable future.

These six Normec Sustainability Goals, supported by quantitative targets, serve as the foundation for our efforts to deliver long-term value, while addressing critical global challenges in a manner that is both strategic and meaningful to our operations.



### 1. Supporting the transition to a more sustainable and safe living and working environment (SDG 8)

Percentage of Revenue from Normec Services that have a positive impact on People and Planet will be at least 95% by 2027.



### 2. Climate Action (SDG 13)

Reduce net climate impact from our operation to 0% by 2040



### 3. Gender Equality (SDG 5)

At least 45% of Senior Management and Leadership Positions filled with female talent by 2027



### 4. Honest Work (SDG 8)

At least 5% of our workforce by 2027 will be comprised of individuals who face barriers to entering the workforce



### 5. Sustainable Supply Chain (SDG 8)

Have 30% of our procurement according to sustainable criteria by 2030



### 6. Clean water and sanitation (SDG 6)

On a yearly basis, per employee at Normec, someone in an underdeveloped country gets access to clean drinking water and sanitation

## 7.2 Measurable ESG KPIs

To provide further clarity and structure around the Normec Pillars (section 5.1), our material topics, the associated identified risks (section 5.2), and in alignment with our Normec Sustainability Goals (section 7.1), we have developed 15 measurable ESG Key Performance Indicators (KPIs). These KPIs are designed to track the progress of our ESG initiatives and actions, ensuring that our sustainability efforts are both accountable and transparent.

| Normec pillars                      | Material topics   | Normec KPI's   |
|-------------------------------------|---|--|
| 1 Business model & strategy         | 1 Environmental services & advocacy                                 | 1 Normec Impact Services   |
| 2 Environment                       | 2 Energy consumption & GHGs<br>3 Materials, chemicals & waste       | 2 Progress on SBTi<br>3 Waste management   |
| 3 Diversity, equity & inclusion     | 4 Diversity, equity & inclusion                                     | 4 Gender diversity senior management<br>5 Gender diversity within the workforce<br>6 Honest work employment program                              |
| 4 Health, safety & well-being       | 5 Employee health & safety<br>6 Working conditions                  | 7 Accident frequency rate<br>8 Accident severity rate  |
| 5 Employee development & engagement | 7 Career management & training<br>8 Social dialogue                 | 9 Number of training hours per employee<br>10 Employee engagement survey (participation and score)   |
| 6 Business ethics & risk management | 9 Corruption<br>10 Responsible information management               | 11 Business conduct and ethics trainings<br>12 Number of business ethics breaches or violations<br>13 Number of data and cyber security breaches |
| 7 Supply chain management           | 11 Supplier environmental practices<br>12 Supplier social practices | 14 Sustainable procurement   |
| 8 Corporate citizenship             | 13 Giving back to society   | 15 Clean water & sanitation  |

Each of these ESG KPIs has been carefully selected to reflect the most critical aspects of our ESG strategy, providing us with the tools to monitor performance in areas such as environmental impact, social responsibility, and governance practices. By focusing on measurable outcomes, we can assess our progress in mitigating risks, achieving our sustainability goals, and driving continuous improvement across the business.

1. We want to make an impact with our services and make a positive contribution to the transition to a sustainable and safe living and working environment. By measuring and setting targets on the Revenue of Normec services that deliver this positive impact on People and Planet, we want to increase our contribution to it.  
**Normec Impact Services 95% per 2027.**
2. We have committed to **SBTi** and have validated our near-term targets and action plan for 2030. After meeting our **near-term targets by 2030**, we will create a new action plan to work on our ultimate goal of net-zero by 2040.
3. At the Normec Group offices, waste separation will be done by employees themselves as much as possible. To keep this process on track, waste bins will be placed at all offices where waste separation is easily possible. Here, among other things, paper, plastic, organic waste, residual waste and possibly coffee cups are collected separately. Normec Group's target goal in the offices for **2030 vs. 2022** is to reduce the total waste from operations by at least **30%**.
4. Gender balance in the Normec Group leadership team; with a goal to fill at least **45% of senior management and leadership positions – including board positions** – with female talent by **2027**.
5. Set clear goals and initiatives for fostering a diverse and inclusive corporate culture, including in the hiring process. Normec aims to fill at least **45%** of her employees with **female talent** by **2027**.
6. The Honest Work Program offers meaningful employment opportunities to individuals who face barriers to entering the workforce, such as people with disabilities or long-term unemployment. Normec aims to foster inclusion, strengthen diversity, and reach a target of **5% of employees** from this group by **2027**.
7. A safe working environment obviously means that we wish to prevent all unsafe situations and thus make every effort to avoid accidents. To quantify the number of accidents within the organization, we will calculate the TRIR metric. The **2027** target is for the **TRIR is not to exceed 1**.
8. An Accident Severity Rate (ASR) is defined as a safety metric used to analyse the severity of workplace injuries by using the number of lost days of work and the total hours worked over a time period. **The ASR should not exceed 10 in 2027**.
9. We establish a Personal and/or Career Development Plan for our employees so that they can continue to grow and develop within our organization. The target we aim for is **27 training hours** per year per FTE in **2027**.

10. We annually measure and monitor how employees are involved, committed and engaged with the Normec Group.
  - We aim for at least **75%** of all invited Normec employees to also participate in this surveys in **2027**.
  - In addition, our goal is for the Employee engagement score to meet a minimum of an e-NPS of **+18 in 2027**.
11. Doing business fairly is important to Normec, training your employees in this is important to prevent incidents and breaches of business ethics. Completion of employee ethics mandatory training (or refresher training), the goal is that **95%** of all mandatory training is conducted in a timely manner in **2027**.
12. Conducting business with integrity is essential to the continuity of an organization. Thus having business ethics breaches or violations is unacceptable and will need to be avoided as much as possible. Risks in this respect should be minimized and measures should be taken to mitigate the risk. The target should be **zero in 2027**.
13. Normec believes it is essential to maintain accurate records and strong internal controls to safeguard employees, customers, their assets, and personal information from unauthorized use or disposition. While cyber security attacks cannot be fully prevented, their impact can be minimized. Therefore, the target for **2027** is to ensure that any **cyberattacks do not result in significant consequences**, such as major data loss or serious breaches of employee or customer privacy.

14. By **2030, 30% of our procurement** will be carried out in accordance with **sustainable criteria**. This target applies to significant purchasing contracts with an annual contract value of at least EUR 50,000.
15. **Each year**, Normec commits to providing access to **clean drinking water and sanitation** to as many people in underdeveloped countries as the total number of its employees. This means that for every employee at Normec, one person will annually gain access to these basic needs.

These 15 ESG KPIs will play a central role in evaluating the effectiveness of our ESG measures, enabling us to report on our performance and make informed decisions to further enhance our sustainability impact.

The details of these 15 ESG KPIs can be found in the Appendix 2 of this ESG Policy.

## 8

# Normec ESG framework

**Our ESG Framework serves as the foundation of our sustainability strategy, representing a coherent approach that brings together several key elements discussed earlier in this ESG policy. This structure allows us to work effectively towards our ESG goals, balancing our business pillars with our external commitments.**

The key components of our ESG Framework are as follows:

- **ESG Strategic Topics**

As outlined in Chapter 4, the 5 ESG Strategic Topics form the backbone of our sustainability policy. These topics were carefully selected based on their relevance to our operations and their potential to create value for both society and our company.

- **Evaluated Normec Pillars, Material Topics and Sustainability Risks** In Chapter 5, we identified our company's core pillars, the most material sustainability topics, and the key sustainability risks that could impact our business activities. This evaluation forms the basis for our ESG goals and actions.

- **Prioritized Sustainable Development Goals (SDGs)**

In Chapter 6, we highlighted four SDGs that have the highest priority for us. These goals align with our core values and business mission, guiding our efforts to make a positive societal impact.

- **Sustainability Goals and ESG KPIs**

Chapter 7 introduced our 6 specific Normec Sustainability Goals, supported by 15 measurable ESG Key Performance Indicators (KPIs). These KPIs are linked to material issues and sustainability risks and enable us to track and continuously improve our sustainability progress.

All these elements come together in our Normec ESG Framework, which serves as an integrated approach to realizing our sustainability objectives. The Framework ensures that we can work consistently and strategically towards our sustainability ambitions, taking into account both internal business processes and external obligations and opportunities.

By ensuring this coherence between our strategic topics, risks, SDGs, goals, and KPIs, we can promote sustainable growth and positively influence our impact on both people and the environment.

### 5 ESG Strategic topics



# 9

## Energy and CO<sub>2</sub>-Policy

**Our company is committed to the responsible use of energy resources and the reduction of our carbon footprint. We recognize the importance of energy efficiency, renewable energy adoption, and CO<sub>2</sub> reduction in mitigating climate change. Our objective is to continuously improve our energy performance by optimizing consumption, reducing emissions, and contributing to global sustainability goals.**

### 9.1 Energy Management Plan

To meet our energy and carbon reduction objectives, we have implemented a comprehensive Energy Management Plan (EMP). This plan is aligned with international standards, such as ISO 50001, and ensures a systematic approach to energy performance improvement. It includes:

- **Energy Audits:** Regular assessments to identify energy-saving opportunities.
- **Energy Efficiency Measures:** Implementation of technologies and processes that optimize energy use.
- **Monitoring and Targeting:** Continuous monitoring of energy performance to ensure we meet or exceed our energy goals.

The EMP is periodically reviewed to adapt to new technologies, business processes, and regulatory changes.

### 9.2 Energy Aspects and Consumption

We have identified key energy aspects within our operations that contribute significantly to our overall energy consumption. These include:

- **Gas Consumption:** Mainly for heating of our laboratories and offices.
- **Electricity Consumption:** Mainly for IT systems, Lab equipment, lighting, heating, and cooling systems in our laboratories and offices.
- **Fuel Use:** For company cars and transportation of samples.

We continually analyse our energy consumption patterns to identify areas where improvements can be made.

### 9.3 CO<sub>2</sub> Reduction Policy

Our CO<sub>2</sub> Reduction Policy aligns with global climate commitments and the goals of the Paris Agreement. We aim to reduce greenhouse gas emissions in our operations by:

- Reducing energy consumption through energy efficiency initiatives.
- Increasing the use of renewable energy sources (e.g., solar, wind).
- Minimizing emissions from transportation and logistics.

Our overarching target is to achieve net-zero CO<sub>2</sub> emissions by 2040, demonstrating our leadership in sustainability.

### 9.4 SBTi Target and Action Plan

We have committed to the Science-Based Targets initiative (SBTi) to ensure our CO<sub>2</sub> reduction goals are in line with the latest climate science. Our specific targets include:

- Normec aims to absolutely reduce scope 1 and 2 emissions by 42% in 2030 compared to 2022
- Normec aims to relatively reduce scope 3 emissions by 52% by 2030 compared to 2022

Normec commits to reduce absolute Scope 1 & 2 GHG emissions **42%** by 2030 from a 2022 base year. Normec also commits to reduce scope 3 GHG emissions from purchased goods & services, capital goods, fuel and energy related activities, upstream transportation, waste, business travel and commuting by **52%** per EUR value added generated by 2030 from a 2022 base year.

**Value added** = operating profit = earnings before interest and depreciation (EBITDA) + all personnel costs.

This method is relevant for sectors heavily relying on human capital, such as Normec. It's relevant for following scope 3 categories

1. Purchased goods and services
2. Capital Goods
3. Fuel and energy related activities
4. Waste generated in operations
5. Business Travel
6. Employee Commuting

The action plan consists of the following components to ultimately achieve the targets mentioned above.

#### Scope 1:

- Switch 60% of the company cars to electric cars, over the period of 2025-2029
- Switch 20% of the company cars to hybrid vehicle (gasoline), over the period of 2025-2029
- Implement predictive maintenance to limit refrigerant gas leaks. At HVAC equipment end-of-life, replace refrigerant gases with CO2 (starting as of 2028).

#### Scope 2:

- Switch 100% of the electricity consumption to green electricity consumption, over the period 2025-2029.

#### Scope 3:

- **Purchased goods & services**
  - Partnerships with SBT suppliers (with at least 68% SBT-committed suppliers). Implementation period: 2024-2028
- **Capital goods (Implementation period 2024-2028)**
  - Partnerships with SBT and Net-Zero suppliers (with at least 50% SBT-committed suppliers).
  - Extend lifetime of 80% of Laptops (from 3 to 4 years).

- Purchased 10% of refurbished computers in 2030.
- Purchased 60% of refurbished IT equipment (mouse, screen..) in 2030.
- **Fuel and energy related activities**
  - Switch 100% of the electricity consumption to green electricity consumption, over the period 2025-2029
- **Waste**
  - Digitize 50% of processes by 2030 to reduce the amount of paper and ink waste.
  - Train 100% of business units by 2025
- **Business travels**
  - Implemented a fixed carbon budget decoupled from the company's growth as of 2027.
  - Use train instead of flights for travels < 5h. Encourage employees to choose train travel instead of flights for business trips that have a duration of less than 5 hours, reducing carbon emissions associated with air travel.
- **Commuting**
  - Promote cycling (infrastructure, mobility budget) to have 15% of employees commuting by bike by 2030.
  - Continue to promote public transportation.
  - Promote electric vehicles through the installation of charging stations to have 20% of employees commuting in electric vehicles by 2030

The progress of the reduction target will be monitored annually in absolute and relative terms. The targets for 2030 will be related to the annual turnover and number of FTEs of the entire Normec Group. This will also be tracked in comparison to our SBTi Targets.

### 9.5 Reference Year

The baseline for our energy and CO2 reduction efforts is the year 2022. All targets and reductions are measured relative to this year. We chose this year based on the availability of reliable and comprehensive data on energy consumption and emissions.

### 9.6 Significant Changes

We acknowledge that significant changes, such as expansions, acquisitions, or technological upgrades, may impact our energy use and emissions profile. In such cases, we will reassess our energy management strategy and update our targets accordingly.

The Normec Group acquires a number of companies each year, making these companies part of the group. These companies should be included annually in the CO2 footprint of the entire organization. As indicated above, the overall target is related to the annual (pro forma) turnover of the entire Normec Group and the number of FTEs.

For SBTi target setting, we chose 2022 as the base year. All business

units and companies/legal entities that were included in the financial consolidation as of December 31, 2022 and thus over which we had control were therefore part of the scope. A recalculation policy for base year emissions has been established in accordance with standard GHG protocol and includes the following:

- 1. External growth:** Incorporating external growth into the base year emissions calculation. If there are material changes (>5%).
- 2. Improved data accuracy:** If more accurate data becomes available for the base year, we will recalculate emissions to improve accuracy of our historical emissions data
- 3. Emission Factor evolution:** If there is a significant improvement in our emissions, primarily due to the availability of new, more accurate emission factors or higher-quality data, we will take the step to recalculate base year emissions.
- 4. Compliance with Standards:** If there is a significant change in standards, we will keep our calculations in line with the latest emission factors recommended by authorities or current reporting standards to ensure our compliance with environmental regulations.

## 9.7 Responsibility

The responsibility for implementing and overseeing our energy and CO2 reduction efforts lies with the Energy Management Team, which is headed by the Chief Sustainability Officer (CSO). Key responsibilities include:

- **Energy Manager:** Oversees day-to-day energy performance and project implementation.
- **Facility Operations Team:** Executes energy-saving projects and ensures efficient energy use in day-to-day operations.
- **Procurement Officer:** Ensures sourcing the right products and assisting with the transition to renewable energy.

## 9.8 Reporting and Demarcation

We are committed to transparent reporting on our energy consumption and CO2 emissions. Each year, we will publish an Energy and CO2 Report as part of our ESG Annual Report, which will include:

- Total energy consumption (kWh) and CO2 emissions (tonnes).
- Progress toward our SBTi targets.
- Key energy efficiency projects and results.

The report will cover Scope 1 and Scope 2 emissions, while Scope 3 emissions will be included progressively as data quality improves.

## 9.9 Quantification Methods and Verification

We use internationally recognized quantification methods to measure and report our energy consumption and CO2 emissions. These include:

- **Energy Data:** Metering and utility bills for electricity, fuel, and gas consumption.
- **Emissions Calculations:** Based on the Greenhouse Gas Protocol, we calculate CO2 emissions from energy use and other sources.



- **Verification:** We engage an external advisor to assist and verify our energy and emissions data annually to ensure accuracy and reliability.

We are committed to continuous improvement and will regularly review and update this policy to ensure it remains aligned with best practices and our evolving business needs.

## Data collection

The table below shows how, when and by whom the data for the CO2 footprint are inventoried.

The below data is supplied by the responsible departments to the CSO so that he can coordinate it with our external advisor. The latter ensures timely processing (annually) of the data in the CO2 footprint.

| Emission Flow   | Unit              | Source   | Responsible department  | When                 |
|---|-------------------|--|---|----------------------|
| Heat / Gas / Oil                                      | kWh or m3         | Reading meter values, energy supplier invoices | Normec Group Purchasing Manager / Energy Management Platform / MD Business Unit | January (every year) |
| Electricity   | kWh               | Reading meter values, energy supplier invoices | Normec Group Purchasing Manager / Energy Management Platform / MD Business Unit | January (every year) |
| Water   | M3                | Reading meter values, water supplier invoices  | Normec Group Purchasing Manager / Energy Management Platform / MD Business Unit | January (every year) |
| Fleet fuel<br>- Diesel<br>- Gasoline<br>- Electricity | Liters- kWh-Euros | Reports, fuel cards, charge cards              | Normec Group purchasing manager / fuel pass platform/ MD Business Unit          | January (every year) |
| Business travel / flying                              | Km                | Declarations, invoices flights                 | Purchasing manager Normec Group / PA Management Board Normec / MD Business Unit | January (every year) |
| Purchased goods and services (OPEX - CAPEX)           | Euros Units       | Supplier List                                  | MD Business Unit  | January (every year) |
| Waste   | Ton               | Waste Overview                                 | Purchasing Manager Normec Group / MD Business Unit                              | January (every year) |
| Commuting   | Km                | Staff Overview                                 | Salary service provider / CHRO / MD Business Unit                               | January (every year) |
| External data storage                                 | GB                | IT service providers overview data consumption | IT Group Department / MD Business Unit  | January (every year) |

*Table 1: Distribution of data collection responsibilities.*

### 9.10 Environmental Impacts of Our Services

As part of our ongoing commitment to sustainability, we determine our CO2 emissions for Scope 1, 2, and 3. Following this assessment, we will calculate how these emissions correlate with the products and services we provide to our customers, allowing us to quantify the environmental impact of our operations at a more granular level.

Moreover, as part of the services offered by one Normec Verifavia, we will further develop this ambition into an additional service for our customers. This initiative is not only designed to ensure compliance with applicable laws and regulations but also to enable our customers to gain valuable insights into the emissions caused by the products and services they utilize. This will empower them to make informed and responsible choices when selecting our services.

Through our Impact Services, we aim to make a positive contribution to both People and Planet, focusing on Quality, Safety, Sustainability, and Environmental responsibility. We are committed to refining this offering and taking meaningful steps to support a sustainable future. This development will continue into 2027, in alignment with the Corporate Sustainability Due Diligence Directive (CSDDD).



# 10

## Waste Policy

### 10.1 Waste policy and objective

At the Normec Group offices, waste separation will be done by employees themselves as much as possible. To keep this process on track, waste bins will be placed at all offices where waste separation is easily possible.

Here, among other things, paper, plastic, organic waste, residual waste and possibly coffee cups are collected separately. In addition, many offices also distinguish between regular paper and confidential paper.

Other waste streams such as small chemical waste, glass, swill (cooked food scraps), white goods, construction and demolition waste should also be separated by type and should be collected through the waste management procedure.

In addition to saving CO2 and energy, waste separation also raises awareness which ultimately leads to a reduction in the amount of waste. Waste separation thus contributes to the creation of waste-free offices.

Normec Group's target goal in the offices for 2030 vs. 2022 is to reduce the total waste from operations by at least 30%. We want to achieve this by:

- 75% waste reduction of commercial waste (residual waste) through separated;
- 50% reduction in waste generated;

- 50% reduction in paper consumption;
- 90% reduction of coffee cups, and encourage reuse through cup sharing.

For the laboratories within the Normec Group, an inventory will be made for each location of how waste separation can be implemented, such that this will ultimately lead to a reduction in waste production.

### 10.2 Paper Consumption

Paper is consumed and used at all Normec sites. Normec's objective is to minimize paper consumption. A digital work process has been implemented at most of Normec's business units, with the aim of speeding up the operational workflow and minimizing any failure costs. An additional benefit, of course, is to minimize the number of printouts and paper consumption. Printing reports and emails is starting to become more and more taboo within Normec, and we see that as a positive development.

To minimize paper consumption, it is also important to track its consumption. As a quantitative record, each business unit should keep track of its paper consumption, with the goal of reducing consumption by at least 10% annually. This will need to be reported on an annual basis to the CSO, who in turn can discuss this at the Normec Group board meeting.

## 11

# HR Policy

**Normec employees take pride in their work and perform well. They take initiative and they feel valued. We believe in the power of true collaboration and knowledge sharing. This is team effort! Employees find it natural to share knowledge and experience with each other. Everyone feels (co-)responsible for their own results and those of colleagues. The employees are directors of their own careers, enjoy learning new things and use these to continue to respond to developments in the organization, society and their own field. Furthermore, our employees always see opportunities and possibilities to improve work and processes, thus shaping a continuous learning organization.**

Our employees largely determine the success of our organization. We are growing and professionalizing strongly. In order to achieve the growth objectives and our sustainable ambitions, we have shaped the HR policy and thus its implementation. The main pillars of our HR Group Policy are made up of the following five topics.

## 11.1 Labour Rights Principles

At Normec, we are committed to upholding the highest standards of labour and human rights in all aspects of our operations. We recognize that respect for human rights is fundamental to achieving sustainable business success, and we strive to create an environment that promotes dignity, equality, and respect for all individuals. These principles covers

the following topics:

- Commitment to UN Global Compact
- Supplier and Partner Expectations
- Modern Slavery and Child labour
- Communication and Engagement
- Monitoring
- Transparency and Reporting
- Compliance

## 11.2 Working Conditions

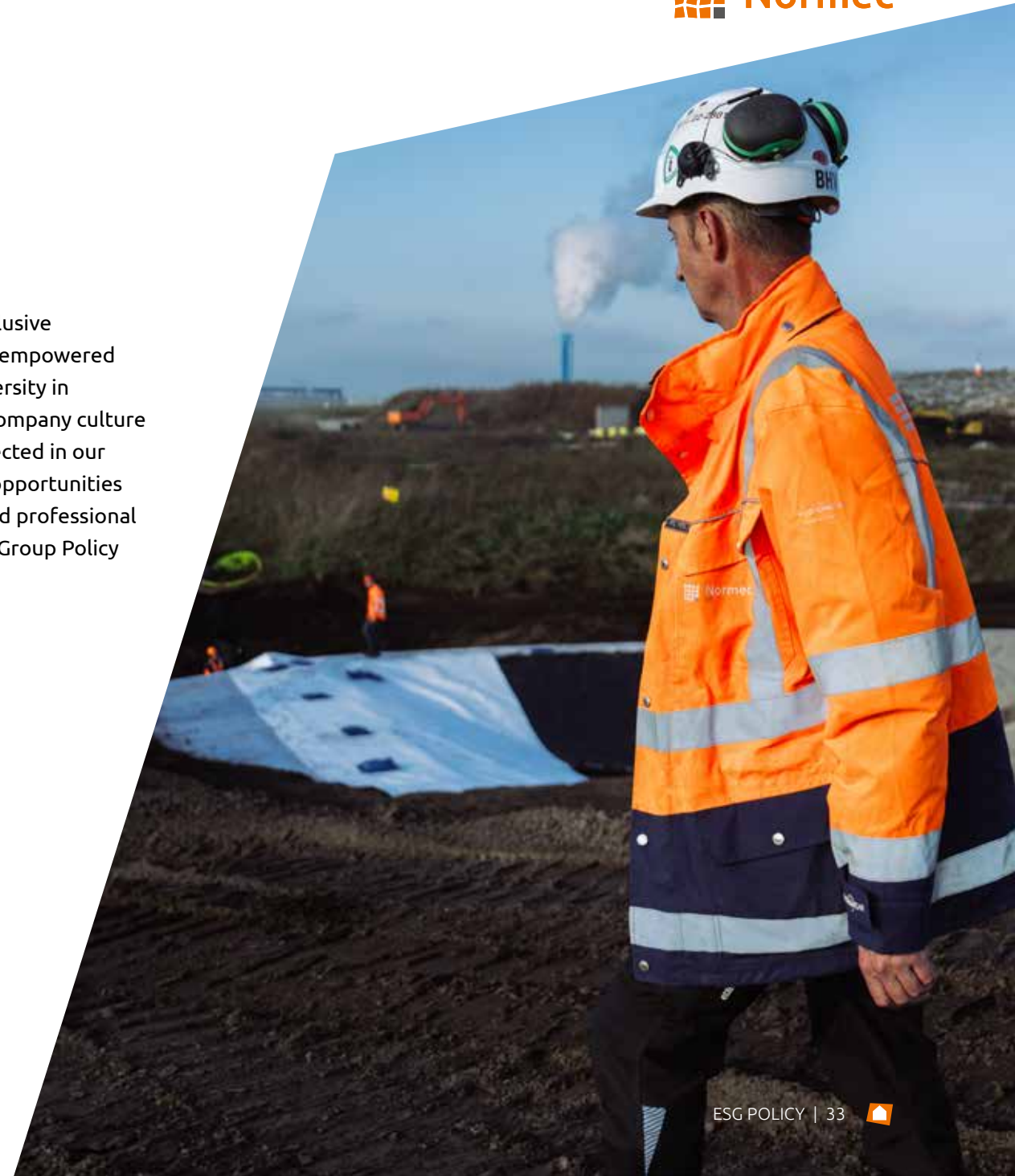
At Normec, we are committed to creating and maintaining a healthy, safe, and productive work environment. Our approach to working conditions is built on the principles of fairness, respect, and inclusivity, ensuring that all employees are treated with dignity and provided with the support they need to succeed in their roles. This chapter outlines our policies regarding working hours, wages, benefits, employment contracts, employee representation, and our commitment to social dialogue. In this Chapter of our HR Group Policy we cover the following topics:

- Working Hours
- Benefits and Wages
- Employment Contracts
- Employee Representation
- Workplace
- Social Dialogue

### 11.3 Diversity and Inclusion

At Normec, we are dedicated to fostering a diverse and inclusive workplace where all employees are respected, valued, and empowered to contribute fully to the organization. We believe that diversity in backgrounds, perspectives, and experiences enriches our company culture and drives innovation. Our commitment to inclusion is reflected in our policies and practices, which are designed to create equal opportunities for all, prevent discrimination, and support the personal and professional development of every individual. In this Chapter of our HR Group Policy we cover the following topics:

- Our Culture
- Fair Recruitment Process
- Preventing Career Discrimination
- Diversity and Inclusion Training
- Women's Development Programs and Mentorship
- Pay Equity Program
- Honest Work Program
- Preventing Discrimination and Harassment
- Grievance Mechanism
- Remediation Procedure



## 11.4 Career Management

At Normec, we are committed to the continuous growth and development of our employees. We believe that investing in our people is crucial to both their personal success and the long-term success of the company. Our career management and development approach is designed to empower employees to grow professionally, explore new opportunities within the organization, and achieve their full potential. In this Chapter of our HR Group Policy we cover the following topics:

- Annual Performance Review
- Development and Career Plan
- Promoting Internal Mobility
- Normec Academy

## 11.5 Health, Safety and Well-Being

At Normec, we prioritize the health, safety, and well-being of our employees. We are committed to creating a work environment that promotes physical, mental, and emotional well-being, ensuring that all employees feel safe, supported, and connected. This chapter outlines our approach to managing workplace risks, our emergency response protocols, and our commitment to fostering a culture of health and wellness. In this Chapter of our HR Group Policy we cover the following topics:

- Health and safety program
- Transparent Communication
- Risk Assessments and Evaluation
- Emergency Action Plan
- Safety Committee
- Safety Instruction Manual
- Complaints Procedure
- Reporting
- The Normec Fit

# Code of Conduct – Upholding Ethical Standards

**At the heart of our company's operations lies a commitment to upholding the highest ethical standards, embodied in our Code of Conduct. This Code serves as a guiding framework for our employees, partners, and stakeholders, ensuring that every action we take aligns with our core values of integrity, responsibility, and respect.**

Our Code of Conduct sets clear expectations for ethical behaviour across all areas of our business, including:

## 12.1 The Integrity Culture

Our company fosters a culture of integrity, ensuring:

- **Compliance:** Adherence to all relevant laws, regulations, and internal policies.
- **Human Right Principles:** Commitment to UN Global Compact and ensuring that both our operations and supply chain meet the highest ethical standards, including a zero-tolerance approach to modern slavery and child labour.
- **Equal Opportunity:** Promoting fairness and equal treatment in all employment practices.
- **Correct Behaviour:** Upholding professional and ethical conduct in all business interactions.

## 12.2 Conflicts of Interest

We aim to avoid conflicts that may compromise our integrity by focusing on:

- **Confidential Handling:** Safeguarding sensitive company and client information.
- **Market Abuse:** Employees must never use any confidential information for personal gain.
- **Use of Company Assets:** Ensuring responsible and appropriate use of company resources.
- **Gifts and Gratuities:** Setting clear guidelines for receiving and offering gifts or benefits.
- **Political Donations and Charitable Contributions:** Regulating contributions to political causes and charitable entities.

## 12.3 Bribery, Corruption, and Fraud

We have zero tolerance for unethical conduct such as:

- **Bribery:** Prohibiting any form of offering or receiving improper benefits.
- **Corruption:** Ensuring all business dealings are transparent and lawful.
- **Fraud:** Protecting the company from deceptive practices.
- **Money Laundering:** Preventing the use of company resources for illicit financial activities.
- **Anti-Competitive Practices:** Committing to fair competition in all markets.



## 12.4 Claims, Complaints & Incidents, and Audit Findings

We are committed to addressing issues through:

- **Complaints:** Providing mechanisms to raise concerns.
- **Claims & Incidents:** Handling and investigating reported issues swiftly.
- **Audit Findings:** Ensuring compliance and improving processes based on audit results.

## 12.5 Confidential Advisor

The primary role of the Confidential Advisor lies in the reception and guidance of the reporter of undesirable behaviour.

## 12.6 Whistleblower Procedure

Our whistleblower system ensures:

- **Reporting Topics:** Encouraging the reporting of unethical practices.
- **Reporting Procedures:** Clear guidelines on how to report and resolve incidents.
- **Protected Disclosures:** Safeguarding whistleblowers from retaliation.

## 13

# IT Security Policy

**Normec Group believes it is important to maintain accurate records and internal controls to safeguard its employees and customers and their assets and personal information from unauthorized use or disposition. In addition, each employee must comply with other applicable local laws or regulations not explicitly mentioned herein. Only a concerted effort by all employees can meet this challenge and protect our assets.**

The purpose of these policies and procedures is to protect Normec's information assets from all threats, whether internal or external, deliberate or accidental, by protecting and minimising threats to Normec's information and information systems, ensuring the confidentiality, integrity and availability of such information.

Aiming to raise our NIST (National Institute of Standards and Technology) cybersecurity framework rating to 4.0 by 2027 provides a robust and comprehensive benchmark for evaluating our overall IT security posture. The NIST rating is a valuable metric because it measures the maturity of an organization's cybersecurity practices across multiple areas, including risk management, incident response, and data protection.

Achieving a rating of 4.0 demonstrates that our company not only has well-established cybersecurity controls but also continuously monitors, assesses, and improves its security protocols. This level of maturity

signifies that cybersecurity is deeply integrated into our business operations and decision-making processes, offering stronger resilience against emerging threats. The NIST framework's focus on both technical and organizational aspects makes it an ideal gauge for the overall IT security of our company, aligning with industry best practices and regulatory requirements.

## 13.1 Privacy and data Protection

Data and information is to be considered a corporate asset, which has value and must be appropriately protected against all forms of unauthorised access, use, disclosure, modification, destruction or denial.

It is the procedure of the Normec Group that best endeavours will be made to ensure security controls are sufficient to maintain the confidentiality, integrity and availability of information and information systems:

- Data and information will be protected against unauthorised access
- Confidentiality of information will be assured
- Integrity of information will be maintained
- Access to information will be properly authorised and maintained. Such access granted should be consistent with job function and accountability will be maintained
- Physical access to information and information systems will be controlled to prevent theft or negligent, malicious or fraudulent use
- Appropriate security controls will be applied during application

development and hardware / software installation to achieve the necessary level of system protection in line with company requirements

- Continuing compliance to documented security policies and procedures will be maintained by regular independent audits
- Component policies, standards, guidelines and procedures may be produced to support these policies and procedures
- Business requirements for the availability of information and information systems will be met
- Business continuity plans will be produced, tested and maintained
- Regulatory and legislative requirements will be met
- Appropriate legal documentation is in place.

Normec Group and/or its group companies are the controller for the processing of the personal data of her employees. The Privacy Statement which is included in the Code of Integrity indicates what employee personal data is processed by Normec, for what purpose, and to which persons or entities the data will or may be provided.

Normec has taken adequate safeguards to ensure the confidentiality and security of your personal data. Normec has implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing.

## 13.2 Cybersecurity

Normec Group has secured its information and data as best it can, it strives to set up its cyber security as effectively as possible. For example, Normec has implemented a set of different measures to ensure data- and Cybersecurity within its organization.

### Security Policy

To ensure security and safety, the Normec Group has established an IT Security Policy that describes and establishes, among other things, the following:

- IT Management
- External suppliers
- Cyber-attacks, suspicious activities
- Process of onboarding
- Preferred & mandatory software / hardware
- Updates / Patches
- Passwords
- Antivirus
- Firewall
- Network segmentation
- Wi-Fi
- Need-To-Know principle
- Administrator accounts
- Back-up (Data-at-rest)

- Disaster Recovery Plan
- Disk encryption
- Bring your own device
- Web protection

### IT Security onboarding and Due Diligence

This document provides a structured overview of the IT Security onboarding and due diligence process, followed for all acquisitions. The procedures are designed to ensure a seamless integration into our IT ecosystem while maintaining a high standard of security and risk control. The process, overseen by the Head of IT and Risk Management, is divided into distinct phases, each focusing on key activities essential for aligning the entity's IT operations with our internal protocols.

A thorough IT due diligence review is mandatory for every acquisition. This review, which includes but is not limited to specific technical controls, assesses the entity's existing IT posture and informs the bespoke onboarding strategy.

The process is divided into four primary phases:

#### **Assessment and Planning (AP):**

This initial phase involves a formal kick-off meeting to establish objectives and clarify the scope of the onboarding. Relevant technical

documentation is then exchanged to facilitate a detailed technical assessment of the entity's IT environment. Based on this evaluation, an IT profile is established, highlighting key risks and informing a tailored risk mitigation approach. During this stage, the entity is preliminarily integrated into our service management platform to ensure early-stage alignment and oversight.

#### **Strengthening Security and Compliance (SSC):**

The focus during this phase is on improving the security of critical systems. Interim technical controls, including but not limited to securing servers, network devices, and managing user identities, are applied to safeguard against immediate risks. Risk mitigation measures are implemented for key areas such as security configurations, identity management, and password policies. These controls are designed to provide a secure operational foundation pending full integration.

#### **Infrastructure Migration and Configuration (IMC):**

In this phase, essential infrastructure components undergo migration to Normec Group IT services and configuration standards. Key tasks include the migration of domain name services and the integration towards the Normec cloud, accompanied by authentication security and identity protection. Concurrently, the IT support framework is extended to the entity, ensuring that all users are onboarded to the Normec service desk and IT management systems without operational disruption.

### **Device and Process Management (DPM):**

The final phase addresses the management and monitoring of user devices and processes. User devices are enrolled in a device management software solution for centralized management, allowing for enhanced visibility and control over endpoints. The entity is also integrated into, and monitored by, our 24x7x365 Security Operations Centre, ensuring rapid response to potential security incidents. This phase ensures the entity's operational processes are aligned with our security standards.

### **Incident Response Procedure**

Despite the precautions taken, it can of course still happen that a security incident occurs. To this end, a procedure has been established to act correctly and appropriately in the event of a security incident.

To support this process, the Normec Group has partnered with NVISO. NVISO is a leading cybersecurity expert. NVISO is assisting the Normec Group with Security Information and Event Management (SIEM) and also provides Security Operations Centre (SOC) Service.

### **Security Information and Event Management**

SIEM is a solution to detect, analyze and respond to threats before they harm business operations. SIEM technology collects event log data from a range of sources, identifies activity that deviates from the norm with real-time analysis, and takes appropriate action. In short, SIEM gives

the Normec Group visibility into activity within their network so they can quickly respond to potential cyberattacks and meet compliance requirements.

### **Security Operations Centre**

A Security Operations Center is the team within the Normec Group IT organization responsible for detecting, preventing, investigating, and responding to cyber threats. A SOC performs round-the-clock monitoring of an organization's network and address potential threats to sensitive data, computing systems, and an organization's other digital resources. With the growing threat of cyberattacks, a SOC is vital to our ability to sustain operations, remain profitable, and achieve and maintain compliance with applicable regulations and that's why we have partnered with NVISO to assist us with this.

### **Awareness**

Cyber attacks are happening with increasing frequency. Studies show that human error is the cause in 90 percent of security breaches.

### **The golden security guidelines**

To increase awareness of this, we at Normec have created the golden security guidelines, consisting of 9 themes. These guidelines have been communicated to everyone and are also available on the Normec Group intranet.



### **e-learning module**

We have also created an e-learning module to be completed and passed by all Normec employees. This e-Learning is about preventing cyber attacks and data protection at the Normec Group, our partners and our customers. This e-learning should be repeated by employees every 2 years to keep awareness on this topic current.

By 2025, 75% of the total workforce across all locations will have completed training on cybersecurity. This training will enhance employees' understanding of cyber risks and best practices, helping to safeguard our organization's data and systems from potential threats.

### **IT Governance**

IT Security is an important topic within the Normec Group and therefore receives adequate attention from management and the board. IT security is represented by the Group Chief Information Security Officer within Normec Group.

Every month, the CISO with the CIO presents to the board the latest status and progress on the strategic IT Security topics. Possible incidents are also discussed and decisions are made on how to improve the IT security process.

### **Cyber Security Insurance**

Finally, Normec Group has taken out a Cyber Security and Ransomware insurance through its insurance broker Marsh with insurance company AIG.

This insurance covers, among things, the first 48 hours of first incident response by an approved SOC team after a major incident. The insurance also covers any ransom should it be demanded by criminal groups.

## 14

# Sustainable Procurement Policy

**At Normec, we are committed to integrating sustainability into our procurement processes. We recognize that the choices we make when purchasing goods and services can have significant social, environmental, and economic impacts. Our approach to procurement is designed to minimize negative effects on the environment, promote social responsibility, and support economic development in a fair and ethical manner.**

## 14.1 Our Commitment to Sustainable Procurement

Normec Group subscribes to the importance of Sustainable Procurement. And so we commit ourselves to:

- **Environmental Responsibility:** We prioritize suppliers who demonstrate strong environmental stewardship, reduce waste, minimize carbon footprints, and use resources efficiently. We encourage the use of products and services that are recyclable, energy-efficient, and have a lower environmental impact throughout their lifecycle.
- **Social Responsibility:** We support suppliers that respect human rights, promote fair labour practices, and contribute positively to the communities in which they operate. We seek to work with partners that ensure safe working conditions and foster diversity, equity, and inclusion.
- **Economic Responsibility:** We aim to foster long-term economic value by supporting local and regional suppliers, fostering innovation, and encouraging fair trade. Our procurement processes are designed to promote transparency, fair competition, and ethical business practices.

## 14.2 Scope and Objective

The Normec Group has set itself the goal of taking greater account of sustainability in the procurement of products and services in the coming years. The first step is to make head office procurement more sustainable. Purchasing from the business units and other subordinate units is now decentralised.

It does not make sense to do this for all procurement contracts; it only makes sense for significant procurement projects. If the annual purchase value of a contract exceeds EUR 50,000, this Sustainable Procurement Policy must be followed. For all procurement contracts with a lower value, this assessment is not required.

Our goal is to have 30% of our procurement according to sustainable criteria by 2030. A procurement contract is sustainable if our Supplier Code of Conduct has been declared applicable to the service or purchase contract and/or if our Sustainability Checklist has been applied to the procurement process.

The development of a sustainable procurement policy is the first step towards achieving this goal. In addition, Normec:

- Make purchasing staff aware of sustainable alternatives and alert them to the new sustainable contracting and procurement policy;
- Carry out a risk screening assessment when selecting a new supplier

- Commit to working in accordance with our Supplier Code of Conduct;
- Apply our sustainability checklist to our procurement process.

### 14.3 Purchasing Process

An ideal procurement process can be divided into 7 steps and are further specified in our Sustainable Procurement Policy:



### 14.4 Risk Screening Assessment

As part of our commitment to sustainable procurement, conducting a comprehensive risk screening assessment is a critical step in the supplier selection process. This assessment allows us to evaluate potential environmental, social, and governance (ESG) risks associated with new suppliers, ensuring that our partners align with our values and sustainability goals.

### 14.5 Supplier Code of Conduct

All sustainability criteria mentioned in this policy are also included in our Supplier Code of Conduct. It is therefore sufficient to declare this Code of Conduct applicable to any procurement or service agreement. If it is declared applicable, we will assume that the supplier agrees with our values and standards in the area of sustainable contracting and procurement.

### 14.6 Supplier Self-Assessment Checklist

Our sustainability checklist tests whether at least the following six themes have been put on the agenda and assessed in the procurement process:

1. Environment (including biodiversity)
2. Climate change
3. Circular (incl. bio-based)
4. Supply Chain responsibility (international social conditions)
5. Diversity and inclusion
6. Social Return

At least 4 of the 6 themes must conclude positively, to classify the underlying supplier or product/service as sustainable.

## 15

# Philanthropy

**As part of our broader Environmental, Social, and Governance (ESG) strategy, we are committed to making a meaningful impact on the communities we serve. Our philanthropic efforts focus on three key areas: charity, employee volunteerism, and the promotion of socially engaged art through our ESG Art Program. These initiatives reflect our core values of social responsibility and align with our long-term sustainability goals.**

## 15.1 Charity

We have partnered with a single, dedicated charity organization Water for Life Foundation to assist in our mission to improve access to clean water and sanitation in underdeveloped countries. This partnership enables us to concentrate our resources on a vital cause, amplifying our impact in regions where such basic necessities are often lacking. By supporting projects that enhance water security and hygiene, we are contributing to the improvement of public health, education, and overall well-being in these communities.

In addition to our Water for Life initiatives, we maintain a separate Charity and Giving Policy. This policy provides detailed guidelines on various aspects of our charitable efforts, including Giving Restrictions, Community Giving, Employee Fund Raising, the Acceptance of Applications, and the specifics of Donation Awards.

## 15.2 Employee Volunteerism

We believe that our employees play a crucial role in driving positive change. Through our structured volunteer program, we encourage employees to contribute their time and skills to support local and global initiatives that align with our ESG values. Whether it's participating in community clean-up activities, educational outreach, or other charitable projects, we empower our workforce to be active agents of change. This not only benefits society but also fosters a strong sense of purpose and engagement among our employees.

## 15.3 ESG Art Program

In support of young, emerging artists with a focus on social issues, our ESG Art Program reflects our commitment to promoting cultural awareness and social responsibility. We purchase works from socially engaged artists and display them in our offices and locations. These art pieces provide a creative platform for addressing critical issues such as sustainability, diversity, and social equity.

Our Art Committee, composed of representatives from across the organization, is responsible for selecting the artwork. To ensure equal representation and fresh perspectives, the displayed pieces are rotated between our offices every two years. This initiative not only enriches our work environment but also helps to support talented artists and bring awareness to the societal challenges they highlight.

# 16

## Endorsements of Global Initiatives

**As part of our commitment to achieving ambitious Environmental, Social, and Governance (ESG) goals, we actively participate in and endorse globally recognized initiatives. Our engagement with these organizations helps to strengthen our ESG strategy, align our operations with international standards, and promote sustainable and inclusive practices.**

### 16.1 United Nations Global Compact (UNGC)

The United Nations Global Compact (UNGC) is the world's largest corporate sustainability initiative, encouraging businesses to adopt principles that promote human rights, labor standards, environmental sustainability, and anti-corruption measures. As a participant of the UNGC, we commit to aligning our strategies and operations with the Ten Principles of the Compact, which focus on:

- **Human Rights:** Supporting and respecting the protection of internationally proclaimed human rights.
- **Labour:** Upholding freedom of association, eliminating forced and child labor, and ensuring non-discrimination in employment.
- **Environment:** Taking a precautionary approach to environmental challenges, promoting greater environmental responsibility, and encouraging the development of environmentally friendly technologies.
- **Anti-Corruption:** Working against corruption in all its forms, including extortion and bribery.

Contribution to ESG Goals: By endorsing the UNGC, we integrate globally recognized principles into our day-to-day business practices, ensuring that we operate responsibly and sustainably. This commitment contributes to the achievement of our social and governance objectives, while also ensuring that we maintain ethical business practices.

<https://unglobalcompact.org/what-is-gc/participants>

### 16.2 Science Based Targets Initiative (SBTi) – Near-Term Targets

The Science Based Targets initiative (SBTi) provides a framework for companies to set ambitious, scientifically backed emissions reduction targets. By setting validated near-term targets with SBTi, we ensure that our efforts to reduce greenhouse gas (GHG) emissions are aligned with the goal of limiting global temperature rise to 1.5°C above pre-industrial levels, as outlined in the Paris Agreement.

Our validated targets demonstrate our commitment to reducing our environmental footprint by:

- **Reducing Scope 1, 2, and 3 Emissions:** We have developed concrete strategies to reduce direct emissions from our operations (Scope 1), indirect emissions from the energy we consume (Scope 2), and value chain emissions (Scope 3).
- **Monitoring Progress:** We regularly measure and report on our progress toward these targets, ensuring accountability and transparency in our environmental strategy.

Contribution to ESG Goals: Our engagement with the SBTi is a key component of our environmental strategy. By setting science-based targets, we are taking meaningful action to mitigate climate change and reduce our carbon footprint, which directly supports the environmental pillar of our ESG commitments.

<https://sciencebasedtargets.org/companies-taking-action#dashboard>

### 16.3 SER Charter Diversity

The SER Diversity Charter is a Dutch initiative that promotes diversity and inclusion in the workplace. By signing this charter, we publicly commit to fostering an inclusive work environment where everyone, regardless of gender, ethnicity, sexual orientation, age, or disability, can thrive. Our commitment to the SER Diversity Charter includes:





- **Diversity Policy:** Implementing policies that promote equal opportunities and prohibit discrimination in recruitment, promotion, and other workplace practices.
- **Inclusive Culture:** Fostering a culture of respect, where diverse perspectives and backgrounds are valued.
- **Accountability:** Setting diversity targets and monitoring our progress toward a more inclusive workforce.

Contribution to ESG Goals: Signing the SER Diversity Charter aligns with our social and governance goals by ensuring that our workforce is diverse, inclusive, and representative of the communities we serve. This commitment helps to drive innovation, improve employee satisfaction, and enhance our reputation as a socially responsible employer.

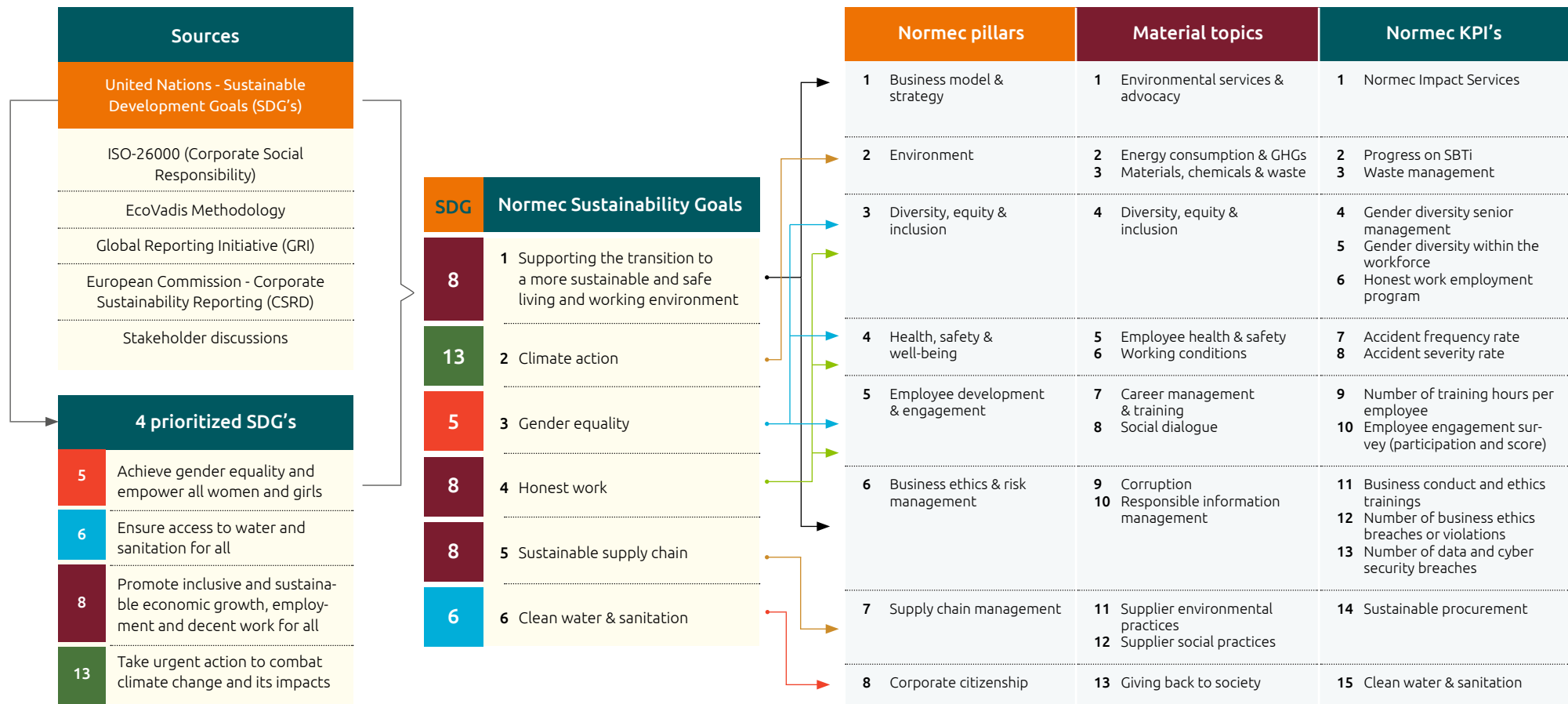
<https://www.ser.nl/nl/thema/diversiteitinbedrijf/charter-diversiteit/ondertekenaars>



## Appendix 1: Material Topics and Sustainability Risks

| Theme  | Normec pillars                    | Material topics                    | Risk elements  |
|--|-----------------------------------|------------------------------------|--|
| <br>Environment               | Business model & strategy         | Environmental services & advocacy  | Encouraging customers to choose the products and services that are better for the environment, or make innovations that reduce the impact on the environment.  |
|  | Environment                       | Energy consumption & GHGs          | Energy consumption in operations as transportation combined with the GHG emissions that this directly but also indirectly results from.  |
|  |                                   | Materials, chemicals & waste       | The consumption of materials in the operation as well as the waste resulting from this in, both general waste or hazardous waste.  |
| <br>Labour & human rights     | Diversity, equity & inclusion     | Diversity, equity & inclusion      | Preventing discrimination and harassment (in its broadest form) in the work environment and all related processes.   |
|  | Health, safety & well-being       | Employee health & safety           | Providing a safe working environment for Normec employees, both physical and mental safety taking into account the working conditions of all employees.  |
|  |                                   | Working conditions                 | Providing the right working conditions allowing all Normec employees to live a healthy life with the right work-life balance.  |
|  | Employee development & engagement | Career management & training       | Provide a career plan from recruitment, your career with internal job opportunities (including training) until possible employee leaving.  |
| <br>Ethics                  | Business ethics & risk management | Corruption                         | Independence and impartiality are important values within Normec, which means that no form of corruption is tolerated. This also includes extortion, bribery, conflict of interest, fraud, money laundering.   |
|  |                                   | Responsible information management | Normec has access to third party information and securing this data in the context of privacy and IP rights, is of paramount importance to maintain the reputation of Normec.                                  |
| <br>Sustainable procurement | Supply chain management           | Supplier environmental practices   | We are aware that we are part of a supply chain, and imposing the same goals we pursue on environmental issues towards our suppliers ensures better chain accountability.                                      |
|  |                                   | Supplier social practices          | We are aware that we are part of a supply chain, and imposing the same goals that we pursue in terms of socially and corporately responsible issues towards our suppliers ensures better chain accountability. |

# Appendix 2: Normec ESG Framework



## Appendix 3: Definition Normec ESG KPIs

### Business Model and Strategy

#### 1. Normec Impact Services (SDG 8):

The impact we have with your services for the client. This means we want to support the transition to a more sustainable and safe living and working environment for everybody on this planet.

- Percentage of revenue from services that have a long-term positive impact on the people and/or the planet.
- We want to make an impact with our services and make a positive contribution to the transition to a sustainable and safe living and working environment.
- By measuring and setting targets on the Revenue of Normec services that deliver this positive impact on People and Planet, we want to increase our contribution to it.
- The goal is to grow this percentage, both organically (up-sale and cross-sale) as well as inorganically, by focusing on M&A targets that contribute to increasing our sustainability services.
- We prefer to measure this on a quarterly basis, if this is not possible, then on a semi-annual basis.

- Normec goal is to have at least 95% of total revenue related to these impact services by 2027.

### Environment

#### 2. Progress on SBTi (SDG 13)

- Normec has an environmental policy that includes a commitment to continuous improvement and pollution prevention. In addition, the policy includes a commitment to comply with relevant legal and other requirements; and provides a framework for setting and reviewing environmental objectives and targets.
- By 2040, Normec Group want our net climate impact from our operation to be reduced to zero; in other words, net zero impact by 2040.
- To make this goal more effective, we have validated near-term targets by SBTi.
- Once these targets are set, including periodic sub-objectives, then we will begin to account for progress on these targets to a KPI that we can track periodically.
- We prefer to measure this on a semi-annual basis, if this is not possible, then on an annual basis.

#### 3. Waste management (SDG 13)

- At the Normec Group offices, waste separation will be done by employees themselves as much as possible. To keep this process on track, waste bins will be placed at all offices where waste separation is easily possible. Here, among other things, paper, plastic, organic waste, residual waste and possibly coffee cups are collected separately.
- Separating waste as well as decreasing paper consumption will reduce the total volume of waste in the offices.
- Normec Group's target goal in the offices for 2030 vs. 2022 is to reduce the total waste from operations by at least 30%.
- The following data will be monitored:
  - Whether an office practices (in accordance with Normec Group standards) waste separation in the offices
  - Whether paper consumption has been reduced by 10% compared to the previous year.
 Should both of these two criteria be met, the result for this office will be positive.
- Between now and 2030, 100% of offices must meet these two criteria. So that's a 7-year period. If we set the initial target for 2023 at

30% and an annual growth rate of 10%, then in 2030 we arrive at 100%.

- We prefer to measure this on a semi-annual basis, if this is not possible, then on an annual basis.

## Diversity, Equity and Inclusion

### 4. Gender diversity Senior management (SDG 5)

- Within Normec, we believe it is important for everyone to have equal opportunities, women and men. Therefore, we would like to track how many of our Senior Management and Leadership Positions are filled by women.
- Definitions:
  - Senior Management: C-suite and C-suite minus one.
  - C-suite: Individuals include CEO and any senior executives reporting directly to the CEO, e.g., CFO, COO, CIO, GC, Divisional MD's etc.
  - C-suite minus one: All professionals who report directly to C-suite level management.
  - Leadership Positions: Local Management Teams: Business unit MD (TIER 3) and his direct Team (TIER 4).

- We collect this data on a monthly basis.
- Normec aims to fill at least 45% of Senior Management and Leadership Positions – including board positions – with female talent by 2027.

### 5. Gender diversity within the Workforce (SDG 5)

- We see that the number of women working within Normec Group is highly dependent on the industry. For example, within the Foodcare division we see a lot more females employed than in our Life Safety division. Therefore, having a specific KPI on just the number of female employees is not practical.
- Yet on average within the Normec Group, we see that the female colleague is understaffed in numbers compared to the male colleagues.
- Therefore, we have chosen to monitor what the pro-forma net inflow is of female colleagues compared to the overall pro-forma net inflow (male and female).
- The goal is for this percentage to be higher than the overall percentage between female and male within the Normec Group.
- If the net inflow of female colleagues is higher than the overall percentage of females in the organization, then the percentage of

female employees within Normec Group will increase.

- We collect this data on a monthly basis.

### 6. Honest Work Employment Program (SDG 8)

- A distance from the labour market often means a distance from being able to fully participate in society. While work has value on so many fronts.
- Therefore, we have set a goal that at least 5 percent of our workforce should be made up of individuals who are having a harder time getting jobs. In this way, we try to create a win-win situation. For the employee to participate in the normal dynamics of society with having a paid job and for us to have someone working and adding value in this difficult job market.
- When someone does not qualify or has difficulty qualifying for regular employment, we speak of distance from the labor market. Other names are work-limited or labor disabled. We recognizes the following types work limitations:
  - **A work disability.** This means that someone has a mental, physical or sensory condition that prevents him or her from

having a regular job. Examples include autism, hearing impairment, a muscle disease, chronic fatigue syndrome or back problems; or

- **Psychosocial problems.** This means that a person has difficulty finding a regular job or doing regular work because of psychosocial problems. These include long-term unemployment, trauma, an addiction history or severe financial problems; or
- **Participation of the elderly in the labor market.** We are also increasingly seeing older people (age > 60) not being considered for jobs despite having a great deal of experience and wanting to participate in the labor market. We also wish to assist this group in finding a fit job within the Normec Group.
- We prefer to measure this on a quarterly basis, if this is not possible, then on a semi-annual basis.

## Health, Safety and Well-Being

### 7. Accident Frequency Rate [AFR] (or also the “Total recordable incident rate” [TRIR]). (SDG 8)

- To quantify the number of accidents within the organization, we will calculate these metrics.
- The definition is as follows:
  - o  $AFR = TRIR = \frac{\text{Number of incidents} \times 200,000}{\text{total number of employee hours worked in a year}}$
  - The 200,000 is the product of the total hours 100 employees would work in 50 weeks based on a 40-hour work week. In other words, it’s an approximation of total hours 100 employees would work in the span of a year.
- Another definition that we should take into account is that for an accident or recordable incident at the workplace and during working hours:
  - Anytime that an employee or worker loses consciousness
  - If an incident causes a worker to take on light-duty, activity restrictions, or the need to be transferred to other work.
  - If an incident causes a worker to take days

away from work (minimum of 8 hours).

- If the injury requires medical treatment beyond what a first aid kit can address.
- If any other work-related health issue is diagnosed by a medical professional.
- Finally, calculating the parameter: “total number of employee hours worked in a year”. We keep track of the number of FTE employed by business unit. We set the number of hours per year for these FTEs at a fixed rate of 1,840 hours.
  - 52 week x 5 day x 8 hours = 2,080 hours
  - National Holidays: 5 days x 8 hours = 40 hours (minus)
  - Holidays: 25 days x 8 hours = 200 hours (minus)
  - Fixed rate number of yearly hours per FTE = 1,840 hours.
- This KPI is measured on a monthly basis and displayed based on 12-month data (LTM).
- The target is for the AFR not to exceed 1. Construction is considered the industry that is least safe, the average AFR there is 3.

### 8. Accident Severity Rate [ASR] (SDG 8)

- A severity rate is defined as a safety metric used to analyse the severity of workplace injuries by using the number of lost days of

work and the total hours worked over a time period.

- The definition is as follows:
  - $ASR = \frac{\text{Work days lost} \times 200,000}{\text{total number of employee hours worked in a year}}$
  - The 200,000 is the product of the total hours 100 employees would work in 50 weeks based on a 40-hour work week. In other words, it's an approximation of total hours 100 employees would work in the span of a year.
- A workday lost is at least 8 hours that an employee was unable to perform his work due to the incident or accident as included in definition in the AFR. Each incident as a result of the AFR definition is at least 1 workday lost.
- Finally, calculating the parameter: "total number of employee hours worked in a year". We keep track of the number of FTE employed by business unit. We set the number of hours per year for these FTEs at a fixed rate of 1,840 hours.
  - 52 week x 5 day x 8 hours = 2,080 hours
  - National Holidays: 5 days x 8 hours = 40 hours (minus)
  - Holidays: 25 days x 8 hours = 200 hours (minus)

- Fixed rate number of yearly hours per FTE = 1,840 hours.
- This KPI is measured on a monthly basis and displayed based on 12-month data (LTM).
- An accident or incident (should it occur), in our view, should not result in a long absence. We consider an average of 10 days absent due to an accident to be a minor accident; in other words, the ASR should not exceed 10.

## Employee Development

### 9. Number of training hours per employee (SDG 8)

- We trust our staff to provide the high-quality service to our customers. To achieve this, it is important that our employees are educated and trained to do so. Maintaining the level of knowledge of our employees is therefore an important development point.
- With this KPI, we want to monitor and track how much time our employees spend and get available to keep their knowledge up to par, the number of training and education hours.
- A training hour is defined as an external, or internal or self-study training hour.
- We collect the data on a monthly basis, but cumulate the number of training hours over

12 months (LTM).

- The metric we want to track is the number of training hours per 12 months per FTE.
- The target we aim for is 27 training hours per year per FTE.

## Employee Engagement

### 10. Employee engagement survey participation (SDG 8)

Normec's employees are its most important assets; having them satisfied is of paramount importance. Therefore, it is important to measure and monitor how employees are involved, committed and engaged with Normec.

- a. Employee engagement survey participation
  - At least annually, but effectively periodically, an employee survey is conducted among Normec Group employees.
  - We aim for at least 75% of all invited Normec employees to also participate in this surveys.
- b. Employee engagement survey score
  - In addition, our goal is for the Employee engagement score to meet a minimum of 50% that are "Actively engaged", and we aim for an increasing score when comparing individual results.

- Employee engagement levels include, but are not limited to:
  - Actively engaged
  - Not engaged
  - Passive
  - Actively disengaged
- Should a survey show that on an individual basis the score is declining at a business unit, specific actions will be taken to investigate and possibly reverse this.
- Our goal is for the Employee engagement score to meet a minimum of an e-NPS of +18 in 2027

## Business Ethics and Risk Management

### 11. Business conduct and ethics (SDG 8)

- Completion of employee ethics mandatory training (or refresher training)
- We require that every employee go through this training once every 2 years.
- All newly added entities must have conducted this training among their employees within 1 year of joining.
- The goal is that 95% of all mandatory training is conducted in a timely manner.

- This KPI is measured every 6 months among all business units

### 12. Number of business ethics breaches or violations (SDG 8)

- Conducting business with integrity is essential to the continuity of an organization. Thus having business ethics breaches or violations is unacceptable and will need to be avoided as much as possible. Risks in this respect should be minimized and measures should be taken to mitigate the risk.
- Business ethics breaches or violations include: incidents relating to corruption, extortion, bribery or violation of competition or tax laws. Examples could include: fraud, sanctions, misrepresentation, pay-to-play, bribery, or other ethical misconduct.
- Our code of conduct is described in our code of integrity, any violation of this code is also considered a business ethics breach.
- The Anonymous Whistle-blower Procedure can be used to report these business ethics breaches or violations. This will be a sub KPI that we will also track as part of this ethics KPI.
- We collect this data on a monthly basis.
- The target should be zero.

- If a breach has occurred (despite all measures), an investigation into it will be initiated and documented. The incident must also be put on the agenda of the periodic Risk and Compliance meeting in order to implement or tighten up any measures.

### 13. Number of Data and Cyber Security breaches (SDG 8)

- Normec Group believes it is important to maintain accurate records and internal controls to safeguard its employees and customers and their assets and personal information from unauthorized use or disposition.
- We shall calculate and track the total number of identified data and cyber security breaches
- Data and cyber security breach is defined as the unauthorized movement or disclosure of sensitive information to a party, usually outside the organization, that is not authorized to have or see the information.
- The scope is limited to data and cyber security breaches that resulted in a deviation from Normec Group expected outcomes for confidentiality and/or integrity.
- We collect this data on a monthly basis.
- While cyber security attacks cannot be fully

prevented, their impact can be minimized. Therefore, the target for 2027 is to ensure that any cyberattacks do not result in significant consequences, such as major data loss or serious breaches of employee or customer privacy.

- If a breach has occurred (despite all measures), an investigation into it will be initiated and documented. The incident must also be put on the agenda of the periodic Data protection and IT Security meeting in order to implement or tighten up any measures.

## Supply Chain Management

### 14. Sustainable Procurement (SDG 8)

- Sustainable procurement means for us that in addition to paying attention to the price of the products, services or works, we also pay attention to the effects of the procurement on environmental and social aspects. Procurement is an effective tool for making an impact.
- Our goal is to have 30% of our procurement according to sustainable criteria by 2030. We translate this into the following annual targets:

- 2023 => 5%
- 2025 => 10%
- 2027 => 15%
- 2028 => 20%
- 2029 => 25%
- 2030 => 30%

- In scope we include the significant purchasing contracts with an annual contract value of at least EUR 50k.
- A purchase contract is according to sustainable criteria if our Supplier Code of Conduct has been declared applicable to the purchase contract and/or our sustainability checklist has been applied to the procurement procedure.
- Our sustainability checklist tests whether at least the following six themes have been put on the agenda and assessed in the procurement process:
  1. Environment (including biodiversity)
  2. Climate change
  3. Circular (incl. bio-based)
  4. Chain responsibility (international social conditions)
  5. Diversity and inclusion
  6. Social Return

At least 4 of the 6 themes must conclude positively, where N/A can also be considered positive.

- We prefer to measure this on a quarterly basis, if this is not possible, then on a semi-annual basis.

## Corporate Citizenship

### 15. Clean Water and Sanitation (SDG 6)

- Water is an important service Normec Group provides to its customers. It is therefore not surprising that SDG6 was chosen by Normec to play a central role.
- With our services we are making impact on water quality in the regions where we operate. However, there are also many people in underdeveloped countries who do not have access to clean drinking water and sanitation.
- So we have set a goal: on a yearly basis for every employee working within the Normec Group to ensure that someone else in an underdeveloped country will have access to clean drinking water and sanitation.
- We have partnered with Water for Life (WfL) who support us in this, they will use our contribution to implement projects that will ensure that these people in underdeveloped

countries do get access to these water facilities.

- Based on the yearly reporting of WfL, we determine how many people we have helped. This number must be at least as large as the headcount of employees working at the Normec Group on a full year basis.
- We prefer to measure this on a semi-annual basis, if this is not possible, then on an annual basis.

