

Business Principles, ESG policy and effort

Latest update: 23.09.2021 - TML

PcP Corporation A/S has developed its core business to meet its strategic challenges in a profitable and socially responsible way. The ESG policy and effort is based on the compliance of PcP Corporation with all local and global laws and regulations. As owned by MIE4 the group also complies with rules and regulations according to Aktive Ejere (Active Owners Denmark).

PcP Corporation follows the ten principles of corporate social responsibility in the UN Global Compact, which it will respect. To further build on the principles, we have defined our ESG initiatives around the UN Sustainable Development Goals, and embedded them in our business model and strategy. We focus our efforts, where we can have a material impact and minimize any risks, and we strive to continuously be an attractive employer, supplier, customer and community member.

PcP Corporation policies and specific initiatives re. the Universal Declaration of Human Rightsand the International Labor Organization's Declaration on Fundamental Principles and Rights at Work (UNGC principles 1-6)

It is the belief of PcP Corporation that each and every employee is responsible for conducting business, and represents the company in accordance with the principles laid down. However, it is the duty of the management to continuously monitor and improve our environmental, social, and ethical performance.

PcP Corporation is committed to perform its business in a transparent manner, even if its principles cover many issues. PcP Corporation also has to acknowledge that the interpretation can be different due to local culture, legislation not to mention the ever changing expectations from the society.

PcP Corporation has the possibility to live up to principles 1 and 2 through how we conduct ourselves internally, and the conduct we require of our suppliers:

- PcP Corporation is only present in countries where local legislation adheres to and protects the
 internationally proclaimed human rights and the International Labor Organization's Declaration
 on Fundamental Principles and Rights at Work (UNGC principles 1-6). On top of that, PcP works
 to meet the UN SDG 8 (Decent work and economic growth), which is codified in our values, and
 actively pursued:
 - Safety always comes first. We have a target of zero lost-time due to accidents at work, and we continuously work to improve safety at work, through preventive and corrective action.
 - We will be respectful towards the individual by making room, no matter gender, political orientation, religion, race, disabilities or other personal circumstances. In other words, we will not discriminate, but offer equal opportunity and promote inclusion. We work to promote the representation of the underrepresented sex (women in the case of PcP), and we have set a target of having zero number of cases re. psychological working environment.
- PcP Corporation has a supplier's code of conduct covering, among other things, the UNGC principles 1-6 (and 10), which is used to screen suppliers.

PcP Corporation policies and specific initiatives re. The Rio Declaration on Environment and Development (UNGC principles 7-9)

PcP Corporation will comply with environmental laws and legislation, and continuously strive to improve our environmental performance, to reduce our impact and to promote increasing responsibility. Specifically, PcP works to meet the UN SDGs 9, 11 and 12 in a number of ways:

- Responsible material consumption, in PcP and by our customers, is at the core of the business model of PcP Corporation. To achieve this, we have defined actions and set targets:
 - Material consumption of steel and aluminum is the single major cost driver and driver of our environmental impact, and therefore we have defined a number of initiatives to bring it down:
 - We use as much recycled steel and aluminum as possible in our products. We aim for using only 100% recycled aluminum, and for steel it depends on the type. In general, we use as high a degree of recycled steel as possible, but as the quality of a steel coil diminishes as the percentage of recycled material increases, we balance it with the quality of our products to reduce the need for in-lifetime service and increase longevity.
 - We send all production scrap (metal pieces from cut-outs, small pieces, or errors) to be remelted and reused, and have a target of not accepting more than 0,1% waste of primary materials.
 - We continuously work to optimize the design of our standard products and customized solutions.
 - Further, we prioritize primary suppliers of steel and aluminum that have defined and follow plans for reducing their carbon footprint.
 - We also work to decrease our consumption of gas and electricity per m2 product we produce, to decrease our environmental impact.
- Lastly, the production facilities of PcP Corporation strives to perform clean and efficient production.
- The ambition is to implement the same or similar politics and principles in all the entities of PcP Corporation, and we will promptly develop and implement plans and programs to correct any noncompliant practices.

<u>PcP Corporation policies and specific initiatives re. The United Nations Convention Against Corruption (UNGC principle 10)</u>

PcP Corporation has a codified policy regarding the principle, which covers our position on the tenth principle:

- PcP Corporation will conduct its business with high ethical standards, honesty and respect for others.
- PcP Corporation will comply with the laws and regulations in the countries we operate.
- Neither PcP Corporation nor the employees should offer, promise, give and/or accept a bribe for business purposes. All gifts, either to or from a business relation, above EUR 100 must be approved by the local Country Managers.
- Neither PcP Corporation nor the employees should be involved in non-competition activities, i.e. illegal price fixing, sharing of customers and markets.

Progress, improvements, KPI's and follow up

PcP Corporation started communicating progress in 2020 as a part of the sustainability reporting of Maj Invest Equity, and we will continue tracking our ESG targets, but we will not make a dedicated COP-report

(Communication On Progress). However, as a part of the certification and recertification of varying standards, goals, KPI's and progress are measured and checked by external parties regularly.

		ISO certificate	CE certificate
PcP Corporation A/S	DK	DS/EN ISO 9001:2015 DS/EN ISO 3834-2:2006	EN 1090-1:2009+A1:2011
PcP. Danmark A/S	DK	DS/EN ISO 9001:2015 DS/EN ISO 3834-2:2006	EN 1090-1:2009+A1:2011 Working according to: EN14001
PF Værktøj ApS	DK		
Nordjysk Døgngalvanisering A/S	DK		
ElefantRiste A/S	DK	ISO 9001	DS EN 1090-1,2
PcP. Norge AS	NO		
PcP Gratings Ltd.	UK	ISO 9001	DS EN 1090-1,2
PcP Deutschland GmbH	GE	ISO 9001	
PcP. Nederland BV	NL		DS EN 1090-1,2
SA PcP Belgium NV	BE		DS EN 1090-1,2
PcP. Sverige AB	SE		
Guardrail Engineering Ltd.	UK	ISO 9001	DS EN 1090-1,2

Once per year CSR is subject on the agenda for a board meeting. Actions and decisions made by the board are noted and followed up via the summary of the board meetings.

Vildbjerg, 23/9-2021...

Chairman

CEO