ESG Policy

Version 2.0 – June 2025

Purpose

The purpose of this ESG policy (hereafter "Policy") is to outline Nobly's commitment to environmental, societal and governance matters that are relevant to our operations.

This Policy determines the foundational ESG guidelines that Nobly will meet current and future legislative requirements with, as well as the market expectations. It is also a reflection of the commitment towards conducting business with integrity, ethics and responsibility. The Policy will also describe how Nobly will integrate ESG into strategic planning, risk management, and employee engagement to ensure long-term sustainability.

Nobly is committed to adhere to both national and international legislation and regulations, as well as the ten principles of UN Global Compact, which form the foundation of this Policy.
Furthermore, we expect our suppliers and partners to be able to demonstrate the same level of compliance.

Additionally, Nobly aims to be an environmentally responsible and reliable IT- and consulting company, offering a diverse and secure workplace.

Scope

This Policy applies to all functions and levels within the company and extends to our interactions with third parties, including vendors, suppliers, and business partners. All processes related to ESG issues must align with this Policy.

It is the management's obligation to continuously encourage employees towards making sustainable business-related choices and hereby ensure continued compliance.

Environment

At Nobly, we are committed to minimizing our environmental impact and thereby contributing to the green transition. Through responsible technology use, reducing energy consumption, managing technology waste and focusing on recycling, we continuously focus on reducing Nobly's emission footprint.

By aligning with global environmental goals, we strive to integrate sustainability into every facet of our business - whether through cloud computing or digital services.

As a consultant company serving both public and private clients, Nobly recognizes its significant role in addressing climate

change. As such, we are committed to aligning with the Global Compact's principles for environmental protection and actively working towards their implementation:

Principle 7 Businesses should support a precautionary approach to environmental challenges.
Principle 8 Businesses should undertake initiatives to promote greater environmental responsibility.
Principle 9 Businesses should encourage the development and diffusion of environmentally friendly technologies.

Social responsibility

We are dedicated to promoting diversity, equality, and inclusion within our workforce and beyond, ensuring that all individuals have equal access to opportunities and resources. By fostering a culture of collaboration and innovation, we aim to create solutions that benefit people from all backgrounds, industries, and regions. Additionally, we prioritize data privacy and security, ensuring that our clients and users can trust us with their sensitive information. Our ethical approach to data management helps safeguard rights and build confidence in the digital world.

We are committed to fostering a workplace that prioritizes employee well-being. We promote a healthy work-life balance through flexible work arrangements, mental health resources, and a supportive culture that encourages open communication. By investing in employee wellness, we enhance productivity, innovation, and overall job satisfaction.

Furthermore, Nobly is committed to supporting NGO's supporting important areas in our society. In addition, Nobly participates in local sport events, arrange social activities using local businesses and in general focus on having local suppliers for the daily operation. We are convinced that supporting the local community in such a way will enhance joint societal responsibility.

Our commitment towards social responsibility extends beyond our own operations, which is why we expect our suppliers to uphold the highest ethical, environmental, and social standards by adhering to our Code of Conduct. This includes compliance with labour rights, environmental responsibility, and business integrity. We collaborate with our suppliers to ensure alignment with our ESG commitments and take corrective action if violations occur.

Through these efforts, we strive to use our expertise and resources to contribute to a fairer, more connected, and inclusive society.
Therefore, Nobly is committed to actively working towards adhering to the Global Compact's principles on labour rights:

Principle 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
Principle 4 Businesses should support the elimination of all forms of forced and compulsory labour.
Principle 5 Businesses should support the effective abolition of child labour.
Principle 6 Businesses should support the elimination of discrimination in respect of employment and occupation.

Governance
At Nobly we strive to be a reliable and responsible partner by always conducting our business in a transparent and credible manner, while also ensuring ethical decision-making at every level of our organisation. To support this, we have implemented a comprehensive Code of Conduct that guides ethical behaviour across the organization. We also provide a Whistleblower Scheme to ensure that employees can report concerns safely, anonymously, and confidentially.

We prioritize a strong and ethical foundation, which fosters trust with clients, employees and stakeholders. This also includes maintaining clear lines of responsibilities, implementing strong internal controls and adhering to relevant national and international legislation. Additionally, we prioritize IT security by complying with key industry standards and regulations, including DORA, GDPR, NIS2, CIS18, and ISO 27001, ensuring the protection of data and systems, while mitigating risks to our business and stakeholders.

Our Compliance Officer, in close collaboration with management, will oversee policy implementation and ensure alignment with compliance standards. ESG progress will be monitored through our compliance tool and reviewed by the Board to ensure continuous improvement.
Nobly's governance practices includes promoting fair business practices, ensuring the integrity of our financial reporting and maintaining a zero-tolerance policy towards bribery and corruption.

The culture at Nobly must encourage open communication, ethical behaviour, and responsible leadership – all in order to drive

long-term success and contribute to the community.
At Nobly we commit to continuous compliance with UN Global Compacts principles on human rights and anti-corruption:

Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights.
Principle 2 Businesses should make sure that they are not complicit in human rights abuses.
Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery.

Compliance
The following circumstances will always be considered serious violations of this Policy:

- Acceptance of bribery
- Sexual harassment and hate crimes
- Discrimination based on gender, religion, etc.
- misuse of the Whistleblower scheme

Related policies
This Policy should be read in conjunction with the Code of Conduct, the Privacy Policy and the external Information Security Policy.