



Corporate Social Responsibility Policy

2022-11-24

Table of contents

Introduction.....	2
Group CEO statement and signature	2
Environment.....	3
Carbon emissions	3
Scope 1 – direct energy vehicles	3
Scope 2 – indirect energy offices	3
Scope 3 – indirect energy travel.....	4
Science Based Targets	4
Waste management.....	4
Waste.....	4
Hazardous waste	5
People.....	6
Workforce health and safety.....	6
Diversity.....	7
Ethics in business.....	7
Legal compliance	7
Anticorruption and bribery	8
Human rights & labour rights.....	8
Data security and privacy	9
GDPR and Cyber Security	9
Society	10
Appendix I: UNGC Ten principles	11

Introduction

Corporate Social responsibility and sustainability is about acting in a way so that we as a company do our fair share of good work for the benefit of the communities where we operate, and the planet we all live in. Geomatikk shall be a good employer, a good business partner, and a responsible actor in society.

Inspired by [UN's 17 sustainable goals](#) (SDGs) and the [10 principles of the UNGC](#) we have set targets for ourselves as described below.

This policy shall be reviewed annually.

Group CEO statement and signature

At Geomatikk group and its group companies we have a vision of designing, building and protecting the modern society's critical infrastructures and thus improving the quality of life for all citizens. As a group we are committed to continuously minimize the impact of doing business on our environment and acting ethically and with integrity in all our relationships whether it is with our employees, our customers, or our suppliers.

Our CSR strategy and policy focuses on a wide range of areas. However, I would like to highlight some that are more important given the context our business operate within and are at the heart of our CSR priorities.

Specifically for our group who operates a large fleet of cars across multiple geographies, we will work diligently to constantly reduce our carbon footprint and carbon intensity in our operations. With a significant number of our employees constantly on the road working in often high-risk environments, we have a strong focus on health and safety for our workforce. Also, as we work with data and information systems concerning our nation's critical infrastructure, one of our key commitments is to cybersecurity and protecting the integrity our national infrastructure.



Geir Hansen

Group CEO

Carbon emissions



7 AFFORDABLE AND CLEAN ENERGY

13 CLIMATE ACTION

SDG Target 7.3: By 2030, double the global rate of improvement in energy efficiency

SDG Target 13.1: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries

Scope 1 – direct energy vehicles

A large part of our business revolves around “man-in-a-van” tech enabled services. By serving multiple customers at once in our coordinated cable location business we work to minimise total carbon footprint. Nonetheless our field technicians drive millions of kilometres every year, mostly using diesel driven vehicles. This is by far the largest contributor to Geomatikks carbon footprint.

Objective: reduction of emissions from fossil fuels

Governance:

- Measure fossil fuels emissions
- Reduce fossil fuels emissions by:
 - o Introducing alternative fuels (electric, HVO fuels, hybrid)
 - o Minimizing driving by improved fleet management
 - o Behaviour training to reduce the emission of the individual driver

Scope 2 – indirect energy offices

The second largest contributor to our carbon footprint is the running of our offices and computing facilities.

Objective: reduction of energy use in our offices and data centres

Governance:

- Measure energy consumption in offices and own data centres
- All companies to work with landlords to reduce consumption
- Own data centres vs Cloud services. Energy efficiency should be considered
- New office (moving): building energy consumption criteria

Scope 3 – indirect energy travel

Business travel is a significant source of resource consumption. We have had a policy for replacing physical meetings with digital meetings and the last few years has really shown that this is possible to a much larger extent than previously thought. It is still thought that people being in the same room from time to time is important. When this is the case, we should do our best to reduce the footprint as much as we can.

Objective: reduce emissions from business travel

Governance:

- Measure travel and accommodations, following the company requirements as a minimum
- Minimise travel (digital meetings etc)
- Promote the use of trains and buses instead of airplanes and cars

Science Based Targets


Some of our major customers are currently pushing their suppliers to develop Science Based Targets. Our majority owner Hg Capital is also promoting this action towards all portfolio companies.

Objective: Develop and submit Science Based Targets within 2023

Governance:

- Commit to Science Based Targets within 2022
- Submit Science Based Targets by end of June 2023

Waste management



SDG Target 12.5: By 2030, substantially reduce waste generation through prevention, reduction, recycling, and reuse

Waste

All Geomatikk companies shall have plans in place to reduce the production of waste as much as possible. Waste production shall be measured, at least to the extent required by internal reporting.

Objective:

- Achieve proper waste management at all locations
- Strive to minimise waste production observing Figure 1 Waste hierarchy.

Governance:

- Have measures in place to minimise production of waste
- Segregate waste types and measure production, as a minimum following the required Group reporting:
 - o Waste sent to landfill
 - o Waste sent to recycling
 - o Waste sent to compost (food waste)
 - o Electronic waste

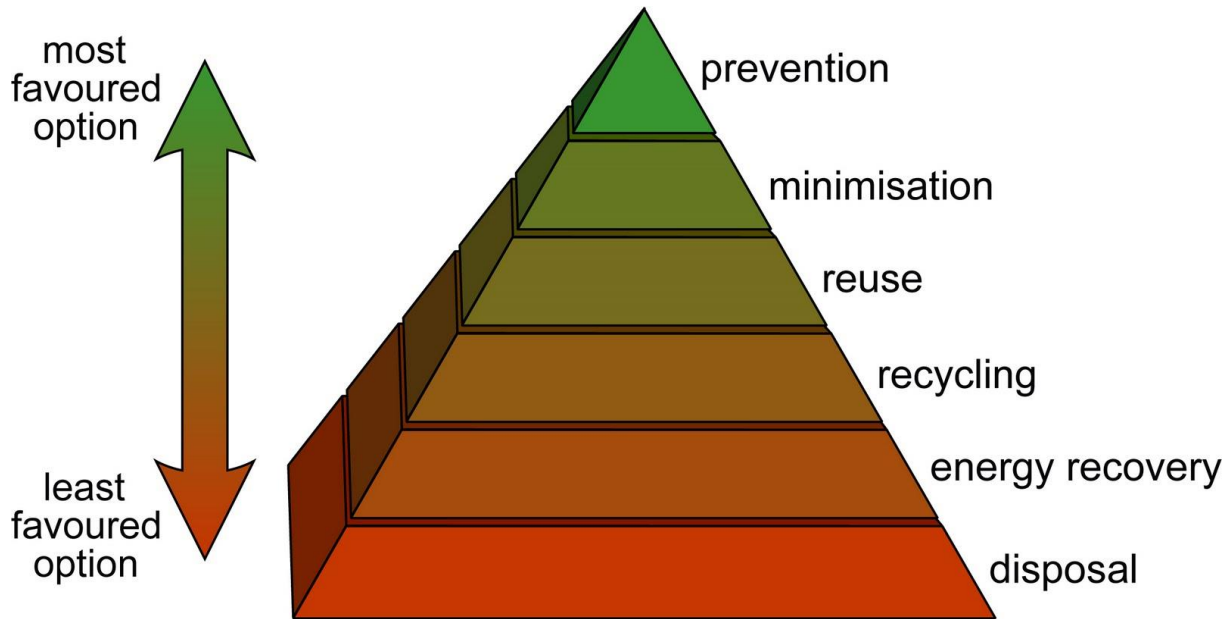


Figure 1 Waste hierarchy

Hazardous waste

Currently the only hazardous waste produced by Geomatikk are empty spray cans which are classed as contaminated packaging materials.

We are required by law to return this contaminated packaging to approved treatment facilities, and formally declare the type and weight of the waste. If we can find products that do not end up as contaminated materials, then that will eliminate treatment and reduce cost of recycling materials.

Objective: Substitute current products that are classed as hazardous waste

Governance:

- Replace products with environmentally friendly alternatives
- Regularly test new environmentally friendly products
- Put pressure on suppliers to develop even better products

Workforce health and safety

8 DECENT WORK AND
ECONOMIC GROWTH



SDG Target 8.8: Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment

Our policy is that Geomatikk shall be a good place to work. As a minimum the physical and psychosocial health of the employee shall not deteriorate as a consequence of the of the employment at Geomatikk. Each operating company shall have a management system for occupational safety and health management including goals and measurement, in line with ISO45001 or equivalent.



Objective:

- Zero Lost Time Incidents (LTI)
- Sick leave \leq 4%

Governance:

- Reporting and analysis of all near misses, medical cases and LTI
- Sufficiently frequent measurement of employee satisfaction, minimum quarterly
- Measure and analyse sick leave so that causes may be understood and dealt with

Diversity

 <p>5 GENDER EQUALITY</p>	 <p>10 REDUCED INEQUALITIES</p>
---	---

SDG Target 5.1: End all forms of discrimination against women and girls everywhere

SDG Target 10.2: By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, origin, religion or economic or other status

SDG Target 10.3: Ensure equal opportunity and reduce inequalities of income, including by eliminating discriminatory laws, policies, and practices and promoting legislation, policies and actions to this regard

Gender equality, other types of diversity (which we are not allowed to measure), discrimination

Objectives:


- Equal opportunity and equal pay for equal work
- Zero incidents of discrimination or abuse
- Develop a diversity strategy

Governance:

- Monitor gender balance at various levels of the organisation
- Analyse our processes to identify risks of systematic discrimination
- Management training in diversity and awareness in the workplace

Ethics in business

Legal compliance

 <p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p>

SDG Target 16.3: Promote the rule of law at the national and international levels and ensure equal access to justice for all

All Geomatikk companies shall follow the laws and regulations in the markets we operate in. In addition, the corporate procedures and policies of Geomatikk must be followed to mitigate ethical and legal risk

Objective: Following the relevant laws and regulations.

Governance: All material legal actions against Geomatikk are monitored and analysed

Anticorruption and bribery


Our Code of Conduct describes our position against all forms of corruption. Any breach of our Policy or applicable law may result in disciplinary action, including dismissal and reports to relevant authorities.

Objective: Zero incidents of corruption and bribery

Governance:

- Training for all employees
- All Geomatikk companies shall communicate actual or suspected breaches to the Group CFO. The anonymous whistleblowing service may also be used.

Human rights & labour rights



8 DECENT WORK AND ECONOMIC GROWTH

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

SDG Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms

SDG Target 16.2: End abuse, exploitation, trafficking, and all forms of violence against and torture of children

SDG Target 16.3: Promote the rule of law at the national and international levels and ensure equal access to justice for all

Geomatikk supports the protection of human rights. This includes the Universal Declaration of Human Rights and the principles set out in the International Labour Organisations (ILO) Declaration of Fundamental Principles and Rights at Work. Our procedures and policies are built on the legislation and traditions of the Nordic countries where we have our roots.

Our employees should experience that Geomatikk is a fair and law-abiding employer, who is genuinely interested in their wellbeing.

In the Nordics we sometimes take some of these issues for granted, but nonetheless we shall ensure that the following principles are followed:

1. Freedom of association and the right to collective bargaining
2. Elimination of forced or compulsory labour
3. Abolition of child labour
4. Elimination of discrimination in respect of employment and occupation

Our Group Code of Conduct sets the rules for how we deal with these issues, including our supply chain.

Objective: Geomatikk shall not be in breach of any of the principles of human rights or labour rights

Governance:

- Geomatikk Group shall ensure the Code of Conduct is not breached by any of its entities or employees
- Geomatikk companies shall have functions in place to make sure no supplier to the Group is in breach of these principles

Data security and privacy



SDG Target 16.10: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements

GDPR and Cyber Security

Our goal is to be among the top companies in our industries with respect to information security. Our customers shall experience that their data is secure with us. Our level of information security should be such that relevant bodies of government approve our systems and practises, when relevant.

Objective: We shall meet and exceed the minimum requirements for Cyber Security set out by our majority owner, the Hg Capital Group.

Governance: Continual improvement based on the ISO27001 framework

Handling personal data is not central to Geomatikk's business. Nonetheless we process personal data belonging to our employees, our customers, and the users of our services.

Geomatikk Group shall process personal data in compliance with the EU General Data Protection Regulation (GDPR), in addition to applicable national law.

Objective: Geomatikk shall not be subject to fines by authorities or be subject to material claims brought by data subjects due to breach of applicable law

Governance:

- All employees training
- A functioning internal control system in all companies

Society



8 DECENT WORK AND ECONOMIC GROWTH
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
12 RESPONSIBLE CONSUMPTION AND PRODUCTION

SDG Targets: Various targets may be relevant in this category

Geomatikk core products and services deals with managing and protecting the infrastructure in the areas where we operate. We see this as our most important contribution to society and the general population.

Objective: become even better at what we do best

Governance: Continual improvement based on the frameworks ISO9001 and ISO14001, in collaboration with our customers and the users of our services

Appendix I: UNGC Ten principles

Human Rights

[Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and

[Principle 2](#): make sure that they are not complicit in human rights abuses.

Labour

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4](#): the elimination of all forms of forced and compulsory labour;

[Principle 5](#): the effective abolition of child labour; and

[Principle 6](#): the elimination of discrimination in respect of employment and occupation.

Environment

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges;

[Principle 8](#): undertake initiatives to promote greater environmental responsibility; and

[Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

[Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.