

# Corporate Social Responsibility (CSR) Policy.

## 1. Purpose and Commitment

At Modulex, our commitment to Corporate Social Responsibility (CSR) is rooted in our core values—collaboration, leadership, respect, innovation and fun. We firmly believe that success extends beyond financial prosperity; it encompasses positive contributions to the community, our workforce’s well-being, and our planet’s preservation. We aim to lead with integrity, innovation, and a collaborative spirit, fostering a culture that embraces responsibility at every level of our operations.

Our key initiatives will focus on these integral aspects of our CSR commitment to Ethical Business Practices, Environmental Responsibility, Social Responsibility, Stakeholder Engagement, Community Investment, Transparency and Reporting, Risk Management, Human Rights, Governance, and Leadership.

## 2. Ethical Business Practices

- Integrity and Honesty: Representatives of Modulex Group must act with integrity, honesty, and fairness in all professional dealings, both within and outside the organisation.
- Conflicts of Interest: Representatives of Modulex Group must avoid situations that may lead to conflict between personal and the interests of Modulex.
- Confidentiality: Representatives of Modulex Group must sign an NDA to respect the confidentiality of information obtained during their employment and only disclose such information with proper authorisation.

### Anti-Corruption:

- Zero Tolerance: Modulex maintains a zero-tolerance policy towards corruption, bribery, and unethical influence. Representatives of Modulex must not offer, give, or receive bribes or engage in corrupt practices.
- Gifts and Entertainment: Acceptance of gifts and entertainment should align with accepted business practices, legal requirements, and our company’s policies. Representatives of Modulex must avoid gifts that may compromise their integrity.

### Fair Competition:

- Antitrust Compliance: Modulex complies with all antitrust and competition laws. Representatives of Modulex involved in marketing, sales, and procurement must know about and adhere to fair competition principles.
- Innovation and Quality: We compete based on merit, innovation, and quality. Unfair business practices are strictly prohibited, including collusion, price-fixing, or market manipulation.

### Compliance with Laws and Regulations:

- Legal Compliance: All employees must familiarise themselves with and adhere to local, national, and international laws and regulations relevant to their roles.

- Regular Review: Modulex regularly reviews its policies and procedures to ensure alignment with current legal requirements. Updates are made promptly to reflect any changes in the regulatory landscape.

#### **Implementation and Oversight:**

- This policy is reviewed with all Representatives of Modulex upon the start of their contract/ employment and is available on our company intranet. The Corporate Sustainability Manager oversees compliance, and any breaches of this policy will be subject to disciplinary action, up to and including termination of employment or contract.

### **3. Environmental Responsibility**

Modulex has a long-standing focus and commitment to sustainable practices. We are dedicated to implementing branding, signage and wayfinding projects while supporting our customers in selecting materials with low levels of embodied carbon.

We provide customised guidance to minimise their projects' environmental impact and emissions, develop efficient signage programs that maximise circularity in the long term, and manage waste through the best available disposal methods.

In cases where European customers require ongoing changes after completion, we strive to implement take-back programs to increase the circularity and material recovery. We aim to implement more take-back programs with strategic customers, accelerating the circularity and reducing resource consumption within our industry. This effort will also align with our goal of selling subscription-based signage and helping Modulex shift towards selling "Products as a Service".

Within our organisation, we work diligently to reduce our carbon emissions. Our global remote-working employment model enables our employees to work flexibly from their home countries, lowering commuting emissions. Furthermore, our factory in Billund, Denmark, is purchasing renewable energy certificates equivalent to the total electricity consumption, thus making our power consumption 100% CO2 neutral.

To encourage sustainable practices throughout our organisation, including individuals working from home, we offer periodic sustainability training and increase awareness to engage all employees in energy- and resource-saving habits. Additionally, we occasionally provide external webinars to our clients and other signage companies with total transparency. These initiatives aim to raise awareness about our sustainability strategy and the importance of a "greener" signage industry.

At a manufacturing level, we manage and improve our waste levels, carbon emissions, energy consumption, and resource use through our ISO 14001 Certified Environmental Management System at our Billund, Denmark facility. Our factory has been a member of the Danish Green Network since 1998 and, in 2022, received our 10th diploma, showing exceptional involvement in the field of "Environment."

By 2030, we aim to reduce our manufacturing emissions by 50%. Modulex will achieve this goal by implementing new, cleaner technologies and processes, collaborating with committed suppliers, and developing new products with a lower carbon footprint. In addition, our global manufacturing

network enables us to manufacture locally for clients where feasible, thus helping us reduce emissions from transportation in our international signage programs.

#### **4. Social Responsibility**

At Modulex, we are deeply committed to corporate social responsibility (CSR), which encompasses our dedication to employee welfare, diversity and inclusion, community engagement and philanthropy.

##### **Worker Welfare:**

We prioritise the well-being and safety of our employees/contractors. This commitment provides a safe and conducive working environment where employees can thrive in the office or home.

Furthermore, we actively promote work-life balance by offering flexible work arrangements and encouraging employees to celebrate their achievements outside the work environment.

Our goal is to create a workplace culture that values the holistic well-being of each team member, recognising the importance of both professional and personal fulfilment. By championing a healthy work-life balance, we believe that our team members can achieve their full potential, leading to increased job satisfaction and overall success.

In addition to ensuring a healthy work-life balance, we are steadfast in our commitment to career development. We provide extensive onboarding training and development opportunities and clear pathways for career advancement within Modulex. We believe that investing in our employees' growth is not only beneficial to them but also to the company as a whole.

##### **Diversity and Inclusion:**

At Modulex, we recognise that our diversity is our strength. We actively foster an inclusive workplace where individuals of different backgrounds, cultures, and perspectives are welcomed and celebrated. We are proud of our global offices and the multiple languages spoken and cultures represented. Our commitment to diversity includes equal opportunity employment practices, ensuring that all employment decisions are made without discrimination based on race, gender, age, religion, sexual orientation, or disability.

Furthermore, we recognise the importance of valuing our workers' voices in shaping our diversity and inclusion initiatives. We conduct regular surveys, allowing employees to express their perspectives to achieve this. This inclusive approach ensures that everyone is validated, cultivating a sense of belonging within our organisation.

Inclusion is at the heart of our corporate culture. We strive to create an environment where workers feel valued and empowered to contribute their best. This commitment to inclusion extends to leadership, where we emphasise inclusive practices that foster collaboration and openness. Our commitment to accessibility is resolute, ensuring that all our physical spaces, technological resources, and communication methods cater to the diverse needs of every employee, irrespective of their abilities. Additionally, we consistently assess and refine our policies, striving to eliminate biases and champion inclusivity throughout our operations.

In alignment with our dedication to fostering an inclusive and supportive workplace, we recognise a

unique opportunity within our employee/contractor structure that allows us to make a significant impact. We commit to creating an environment where individuals with movement-related disabilities find equal opportunities and thrive, whether they work in non-remote or remote roles. Our organisation is committed to removing barriers that may hinder employment for these individuals, offering them a valuable chance to contribute their talents and expertise to Modulex. By actively seeking out and welcoming individuals with movement-related disabilities into our workforce, we enhance our diversity and create an environment where everyone's abilities are recognised and valued, regardless of their work location. This initiative reflects our core values and strengthens our commitment to fostering inclusivity throughout our organisation.

### **Community Engagement and Philanthropy:**

As we look ahead, our vision for community engagement and philanthropy involves an active commitment to giving back to the communities where we operate. We envision focusing on education, environmental sustainability, and poverty alleviation, aiming to contribute significantly to improving society and the planet.

## **5. Stakeholder Engagement**

At Modulex, we envision a future where our engagement with key stakeholders, including workers, customers and management, reflects a commitment to transparency, collaboration, and shared success. We recognise these stakeholders' critical roles in shaping our corporate identity and driving our business forward.

In our commitment to employees/contractors, we aspire to create an inclusive and empowering workplace where they are contributors and active participants in our CSR journey. This commitment involves maintaining regular communication channels that provide updates on CSR initiatives and their impact. By fostering a culture of open communication, we aim to include employees in decision-making processes, ensuring their valuable input shapes our CSR strategies. Our company has an employee/contractor-led culture team that focuses on our global team's non-work-related needs. Whether it's fun, mental health or overall support, this team stays connected to the needs of our international team, ensuring they feel supported.

Building on this foundation of employee/contractor engagement, we have an "Achievers Awards" program that celebrates and awards our team. We introduced a Dragons' Den program at Modulex. This annual innovation initiative is a cornerstone in our efforts to nurture a dynamic and participatory work environment. Employees/contractors are encouraged to bring innovative ideas to our executive committee. This program not only offers the possibility of financial rewards for winning ideas but also provides support and resources to transform these concepts into tangible products or services. This initiative reflects our commitment to cultivating a culture of innovation and empowering our team members to contribute to the growth and success of our company.

For our customers, we strive to build lasting relationships based on trust, transparency, and shared values. Our transparent engagement practices involve actively seeking feedback through surveys and other mechanisms. Our commitment to clear and transparent reporting on CSR activities, using metrics and KPIs, ensures that our customers understand our sustainability efforts comprehensively.

In terms of management, our vision is for them to be at the forefront of driving our CSR strategy, embodying our commitment to responsible business practices. The ongoing approach includes our leadership actively participating in collaborative initiatives and decision-making processes. This commitment involves establishing measurable targets for leadership-led CSR initiatives, ensuring the management team's involvement is quantifiable and impactful. Through transparent communication, they will ensure the entire organisation aligns with our CSR goals and values.

## 6. Community Investment

At Modulex, we are committed to making a positive impact within our industry and the communities where we operate. Our dedication to corporate social responsibility extends beyond our core business activities.

Corporately and at our regional offices, we support educational programs and hire student interns to provide training opportunities to empower future generations of business leaders. We proudly invest in developing young professionals by allocating approximately 100,000 euros annually towards training our international interns. This initiative allows young people to enhance their professional skills and experience new cultures. It also allows us to imbibe fresh perspectives and ideas, keeping us at the forefront of innovation.

We believe that true philanthropy begins at the grassroots level. That's why our charitable initiatives, driven locally, allow each office to engage actively and support causes most relevant to their specific communities. By empowering our teams to identify and address the pressing issues in their local areas, we ensure that our corporate giving has a meaningful and lasting impact. Through this approach, we contribute to the well-being of our communities and foster a culture of social responsibility that resonates globally.

We regularly assess the social and environmental impact of our investments. Our commitment to community investment is an ongoing journey. We are dedicated to learning from our experiences, listening to feedback, and adapting our strategies to meet the evolving needs of our communities.

## 7. Transparency and Reporting

Transparency is fundamental within Modulex, both towards our customers and our organisation and supply chain. Modulex Group publicly discloses its financials in its yearly report and openly communicates with its supply chain stakeholders. Transparency is a key value within our organisation. We publish the environmental impact and metrics of our Billund, Denmark factory in a bi-annual report. We openly communicate our products and our products and services results, composition and life cycle stages to our customers and partners.

## 8. Risk Management

Internally, we delegate the implementation of our CSR values and policies to each Managing Partner leading local Modulex units. Any instances of CSR risk will trigger an internal investigation and the performance of a solution and corrective action - our organisation will not tolerate any breach of our Code of Conduct.

Externally, we audit all suppliers according to our Code of Conduct to ensure our CSR values and

policies are met throughout our supply chain. We visit and work closely with most of our suppliers and partners to provide a close relationship and transparency within our supply chain.

Our factory in Denmark carries out periodic supplier evaluations for our quality (ISO 9001) and environmental requirements (ISO 14001) according to the needs of our management systems. These evaluations help us select our suppliers, map their ecological impact and the impact of our products, and encourage improvement within our supply chain.

## 9. Human Rights

At Modulex, we expect every aspect of our business to uphold the highest human rights standards throughout our entire supply chain. We prioritise individuals' safety and are committed to supporting and respecting all employee/contractors.

Additionally, we are dedicated to ensuring that our operations and suppliers adhere to human rights principles, focusing on continuous improvements. This commitment is outlined in the United Nations Universal Declaration of Human Rights and other applicable international standards, reflecting our unwavering dedication to global human rights principles.

We maintain a strict zero-tolerance policy for harassment, abuse and discrimination. We are committed to providing a safe and healthy workplace for all employee/contractors and continuously assess and improve our health and safety protocols to mitigate risks and promote the well-being of our workforce. In our commitment to human rights within the supply chain, we conduct thorough assessments of our suppliers, seeking partnerships with those who share our dedication to human rights and social responsibility. In cases where issues arise, we collaborate with suppliers to address and remedy them, recognising that promoting human rights within the supply chain is an ongoing process. We strive for continuous improvement in our supply chain practices, making strides toward a system that respects and upholds human rights.

Modulex has established mechanisms for reporting violations or concerns related to human rights within the organisation or our supply chain. Employee/contractors, suppliers, and other stakeholders are encouraged to report any issues they encounter, and the company is dedicated to investigating reported concerns and taking appropriate action when necessary. We provide training and awareness programs to educate our employee/contractors and suppliers about our human rights policy, covering specific topics to ensure everyone understands and actively promotes human rights.

## 10. Governance and Leadership

Our Executive team and Sustainability Manager at Modulex are deeply committed to setting a clear vision and articulating the company's values. Leadership plays a pivotal role in setting CSR priorities that align with our business goals, stakeholder expectations, and global sustainability challenges, ensuring that CSR integrates into our overall strategy.

Our leaders are accountable for our CSR performance, setting targets, tracking progress, and reporting results. Informed decision-making is a cornerstone of their approach, balancing economic, environmental, and social impacts. Leadership is responsible for making decisions that promote



sustainable practices, even when faced with short-term challenges. They actively consider the long-term effects of our actions on the environment, society, and business, developing strategies to mitigate risks and leverage opportunities that enhance our sustainability efforts.

Our leaders actively engage with internal and external stakeholders to understand their expectations, concerns, and feedback regarding our CSR initiatives. They maintain accessibility and responsiveness to stakeholder input, fostering relationships with employees/contractors, customers, suppliers, investors, and the community to build trust and partnerships that strongly support our CSR goals.

Leaders play a central role in communicating our CSR efforts to stakeholders through transparent reporting. Leadership is responsible for ensuring compliance with all relevant laws and regulations related to CSR and for upholding ethical standards in our operations.

Our leaders encourage a culture of continuous improvement and adaptability in our CSR initiatives. They support innovation and endorse evolving practices contributing to sustainability and social responsibility. Leadership is committed to learning from successes and failures and sharing these experiences to foster growth and improvement in our CSR programs.

## **Policy Owners**

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## **Contact Information**

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