ESG Policy
SP Group 2026

SP Group A/S
Snavevej 6-10
5471 Søndersø
Denmark

CVR no. 15 70 13 15

ESG Policy for SP Group

Purpose

At SP Group, we are committed to driving sustainability. We believe that acting responsibly goes hand in hand with expanding our international footprint and enhancing our earnings and growth.

With a view to ensuring that we deliver on our responsibility ambition, we have laid down an ESG Policy for SP Group that reflects our fundamental commitment to developing the best plastics solutions for the benefit of our customers and the surrounding environment. Our ESG Policy thus sets the scope for all our activities and for our profile as an attractive workplace and business partner.

SP Group's ESG Policy has been designed so as to ensure that we comply with all applicable laws in the countries in which our business activities are located, all regulations and standards as well as industry practice. We are a signatory to the ten principles on corporate social responsibility under the UN Global Compact, and we work actively towards achieving the UN Sustainable Development Goals. We have aligned our efforts with the ESG paradigms applied by investors, and our ESG Policy consequently covers the following areas: environment and climate, social responsibility and corporate governance.

We continually engage with our suppliers to promote their work on corporate social responsibility. To that end, we have prepared a Supplier Code of Conduct, which forms the basis of our expectations for and dialogue with our suppliers on corporate social responsibility. We primarily focus on our suppliers of moulds, as our materials suppliers are well-reputed international groups that are already reporting on their ESG efforts.

At SP Group, we are aware that a number of stakeholders have expectations for and/or make demands on our social responsibility. We collect input from stakeholders and seek to embrace it as far as possible, as we believe the best social outcomes are achieved through partnerships and joint efforts.

Scope

The ESG Policy applies to all parts of SP Group and is underpinned by training, education and communication in the companies. Any derogation from the ESG Policy must be approved in writing by SP Group's Board of Directors.

Monitoring and reporting

We document any matters of significance when it comes to ESG and our environmental, social and financial impacts. Once a year, we provide ESG-related information in our group annual report, which thus constitutes our reporting on corporate social responsibility in accordance with the Corporate Sustainability Reporting Directive (CSRD) and sections 99 a, 99 b, 99 d and 107 d of the Danish Financial Statements Act and our Communication on Progress (COP) report for the UN Global Compact.

ESG organisation

To ensure that we deliver on our ambition of corporate social responsibility and a sustainable business model, we have established a clear structure for managing our ESG efforts. This structure ensures a clear distribution of roles and responsibilities at all levels of the Group.

The Board of Directors has the overall responsibility for overseeing the Group's ESG efforts and for ensuring corporate governance, including processes for identifying, assessing and managing material sustainability impacts, risks and opportunities. The Board of Directors ensures that the ESG strategy is aligned with the Group's overall business strategy and sets targets and guidelines for the work.

The Executive Board continuously oversees the implementation of the ESG strategy, ensures the integration of sustainability into business processes and assesses risks and opportunities at group level. The Executive Board works closely with the Group's ESG manager, who is responsible for planning and coordinating sustainability actions across the Group and for updating our double materiality assessment. The Executive Board is responsible for reporting to the Board of Directors on the status of ESG data. At company level, the individual management teams are responsible for the day-to-day implementation of ESG initiatives, which are rolled out systematically through certified management systems and include ongoing dialogue and collaboration with environmental and health and safety organisations. The factory management teams are responsible for quarterly data collection and reporting to our ESG manager on progress, results and potential challenges.

Sustainability efforts

SP Group has developed a sustainability strategy with related strategic objectives. These objectives reflect our systematic

efforts to contribute to the UN Sustainable Development Goals and the materiality analyses prepared in connection with reporting according to the EU Corporate Sustainability Reporting Directive (CSRD) and accompanying European standards. Our double materiality analysis thus contributes to ensuring that our sustainability efforts reflect our impacts on the environment and people as well as the financial effect of SP Group's sustainability impact. The implementation of these efforts is supported by our business conduct and corporate culture principles.

Environment and climate

Plastics generally possess a number of unique properties that play an indispensable role in society, and when produced, applied and handled with care, plastics have a favourable impact on health and safety. Accordingly, in developing new products, we always aim for them to have as little adverse environmental impact as possible, and we promote the development and diffusion of environmentally friendly technologies.

Climate change

Climate change is a reality, and at SP Group we aim to continuously adapt our business and activities to these changes, and we will seek to mitigate climate change through a number of initiatives to reduce our greenhouse gas emissions. The transition to the use and production of renewable energy, energy efficiency improvements and the development of environmentally friendly production technologies will contribute to mitigation.

Through the companies' ISO 14001-certified environmental management systems, we will systematically work to reduce our impact on the environment and promote greater environmental responsibility. To this end, we aim to limit our consumption of heating, water and energy as well as nuisance from noise, odour and dust. We aim to reuse materials and products, optimise the consumption of raw materials and use environmentally friendly materials in production and development processes.

Raw materials and circular economy

At SP Group, we are aware that a very large part of our raw materials is produced from fossil sources. We therefore take active responsibility for developing our business and production in a responsible way that increasingly reduces negative environmental impacts and contributes to sustainable development and the transition to a circular economy.

Raw materials are sourced according to the companies' ISO 9001- and ISO 14001-certified quality and environmental management systems. This ensures that we comply with all environmental directives, including REACH, the Candidate List of Substances of Very High Concern and the RoHS Directive.

Sustainable use is achieved by increasing the recycling of plastics in our production as well as the utilisation of our own surplus materials from production and regenerated materials from other players in the plastics industry.

In addition, we limit wastage and waste volumes, which are sorted for purposes of recycling in a circular process.

Social responsibility

As a company with global operations, it is important to SP Group that we provide attractive working conditions for our employees and comply with international standards and local legislation for reasonable and fair working conditions. We also assume responsibility for respecting the human rights of both employees and people affected by our local activities.

To that end, we carry out systematic risk assessments and plan risk management in accordance with the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises. As part of these efforts, we endeavour to engage in dialogue with employee representatives and other local community players.

Employment and labour conditions

At SP Group, we respect the right of our employees to equal and fair working conditions in accordance with the ILO Declaration on Fundamental Principles and Rights at Work. We are committed to providing healthy and safe workplaces and, through the companies' ISO 45001-certified health and safety management systems, to working systematically to improve the physical and mental working environment and prevent accidents at work.

We provide attractive terms of employment for our employees by, for example, complying with applicable legislation and collective agreements for our areas of activity in relation to pay and other employment terms.

SP Group pays all employees a salary that is sufficient to cover their basic needs and thus enable them to maintain a decent standard of living for themselves and their families. This includes the costs of food, housing, healthcare, education and training, transport and other basic needs that together enable a person to lead a dignified life.

We also provide our employees with opportunities for professional development through supplementary education and training.

We comply with relevant legislation, national as well as local, recognising the freedom of association of our employees and their right to collective bargaining, rest and leisure, equal pay for women and men, anti-discrimination, parental leave and equal access to jobs and careers.

Trafficking in human beings and forced labour

At SP Group, we do not tolerate any form of human trafficking, forced labour or modern slavery, where people are moved and exploited to perform work under threats or coercion. We always strive to protect our employees from any kind of physical punishment, mental and/or physical coercion, or harassment.

Child labour is not tolerated at SP Group. Employees between the ages of 15 and 18 are not allowed to work nights or to perform hazardous work that could be harmful to their physical or mental health.

Our suppliers are subject to similar requirements through SP Group's Supplier Code of Conduct.

Women in management

In order to maintain a focus on increasing the proportion of the underrepresented gender in management, SP Group has a policy for women in management, the aim being for each gender to be represented among the final three candidates when management positions are to be filled.

In the highest governing body, gender equality is pursued in accordance with the law, and we thus comply with the requirement of 40% representation of the underrepresented gender.

The Board of Directors has adopted a policy setting out to increase the proportion of the underrepresented gender at the Group's other management levels and to promote diversity, the aim being to fill management positions based on the qualifications required while promoting the representation of women where possible.

Diversity and discrimination

As an international company, SP Group respects the cultures and traditions of others, and we insist that our relations be characterised by mutual trust and respect.

We prevent discrimination on grounds of age, gender, race, colour, disability, religion or belief, language, national or social origin, union membership, political views or any other grounds recognised by international conventions. Any decision concerning appointments, employment conditions, promotions or remuneration is made on the basis of relevant and objective criteria.

Promoting diversity and preventing discrimination are part of the Group's training activities, which are linked to the companies' ISO 45001-certified health and safety management systems.

Our Supplier Code of Conduct requires suppliers to refrain from the above-mentioned types of discrimination in employment relationships and to apply relevant and objective criteria in all employment decisions.

Human rights

At SP Group, we support and respect the protection of international human rights. In countries in which there is a risk of infringement of human rights, we strive to prevent any human rights abuse, and should we become involved in such abuse, we take corrective action.

Our products allow us to contribute to protecting human rights, locally and globally, primarily through health products that contribute to quality health services and products that help improve food safety.

Governance

At SP Group, we want to maintain a high level of integrity and responsibility, both within the Group and across our external relations. We have therefore established internal practices that strengthen a corporate culture focused on good business practices. We strive to commit our suppliers to respect our values by means of our Supplier Code of Conduct.

Anti-corruption

SP Group does not engage in corruption in any form, whether it be extortion, bribery, embezzlement, fraud, facilitation payments, nepotism, cartel formation or conflicts of interest. We do not offer or promise any form of bribe for the purpose of exerting undue influence on public-sector employees, judges or business relations, nor do we receive, accept or participate in any form of bribe. This ensures that we comply with relevant international standards and conventions.

We respect all international trade embargoes without exception. We do not accept anti-competitive conduct, and we disclose and validate all relevant financial information in accordance with Danish law.

The obligation not to be a party to corruption or bribery in any form extends to our agents, intermediaries, consultants and others acting on our behalf.

Through training of relevant employees, we ensure the prevention of corruption, and we have established a whistleblower programme allowing any person associated with SP Group to report in confidence any suspected corruption.

Data protection

SP Group ensures responsible use of IT systems and personal data through efficient personal data protection, robust IT systems and data ethics considerations regarding data use.

Our data ethics efforts are based on five data ethics principles according to which people must be the primary focus so they feel they are in control of their data, the use of personal data must be transparent, and data processing must be carried out in a responsible manner and promote dignity and equality.

Tax

SP Group pays tax in all countries in which we have a permanent establishment, thus contributing to sustaining and developing the societies and markets we are a part of. Our Board of Directors has adopted a tax policy which reflects the Group's general ethics and determines that, as a listed company, we have an obligation within the scope of the law to contribute to the society we are a part of.

Payment practices

SP Group's payment practices are laid down by the individual companies and depend on their trading agreements and terms. Agreed payment practices must be respected.

Whistleblower programme

In accordance with applicable law, SP Group has established a whistleblower programme allowing any person associated with the Group to report in confidence any suspected non-compliance with SP Group's policies and guidelines, laws and regulations as well as any other serious concerns. This ensures an avenue for complaint in all areas covered by the ESG Policy.

Reports are submitted through SP Group's whistleblower portal. All reports are handled confidentially by our external partner, the law firm HortenDahl. Managers and employees of SP Group do not have access to the reports.

Approval and annual review

This ESG Policy has been approved by SP Group's management. The policy is reviewed and updated at least once a year or more frequently if there are changes in legislation or in SP Group's internal circumstances.

ESG Policy for SP Group, version 1.3, was approved on 20 August 2026.

SP Group A/S

Snavevej 6-10
5471 Søndersø
Denmark

Tel: +45 70 23 23 79
www.sp-group.com
info@sp-group.dk

Company reg. (CVR) no.: 15 70 13 15

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