



Corporate responsibility & Sustainability report 2023



COMMITTING TO A BETTER WORLD THROUGH RESPONSIBLE PRACTICES



*Peter Fahoum
Group CFO
& Compliance Officer*

"At SEC DATACOM Group A/S, we understand the importance of contributing to a better world. We have an increased focus on taking responsibility for our planet and fellow human beings and have in this spirit adopted various policies and implemented activities. Our CSR strategy forms the framework for a collective effort to operate as a company without deteriorating society and the environment but rather improving it."





SEC DATACOM: PAVING THE WAY FOR A SUSTAINABLE ENVIRONMENT THROUGH GREENER OPERATIONS

At SEC DATACOM, we recognize the importance of integrating environmental considerations into our operations. With policies spanning from electric vehicle adoption to organic dining, we are taking measured steps to align our practices with broader environmental goals. Dive into our approach to understand how we are working to make a difference for our environment.

Charging Forward: Our Policy for a Complete Transition to Electric Vehicles

As part of our unwavering dedication to environmental stewardship, we proudly introduce "Charging Forward: Our Policy for a Complete Transition to Electric Vehicles." This comprehensive guideline exemplifies our vision for a sustainable transport future, outlining our steps towards an entirely electric fleet and emphasizing our commitment to reducing carbon emissions. Join us on this electrifying journey towards a greener future.

Purpose

The primary objective of this policy is to align our company's transportation choices with our commitment to environmental sustainability and reduce our carbon footprint.

Scope

This policy pertains to all company-owned vehicles used for business purposes across all departments and locations.



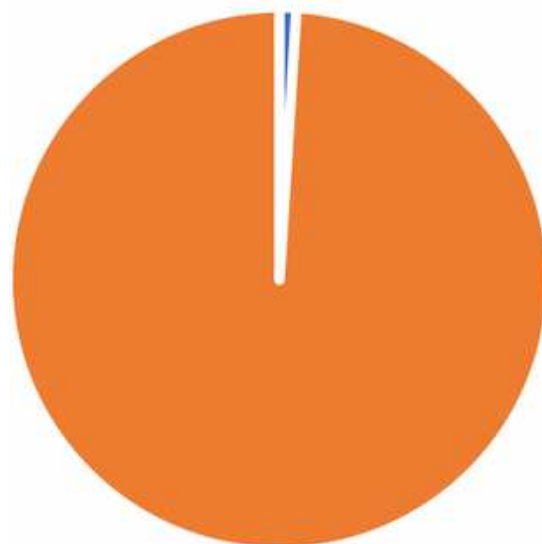
Policy Statement

1. Exclusive Use of Electric Vehicles (EVs): All company cars purchased, leased, or operated by our organization will be electric. This applies to all new acquisitions and the eventual replacement of any existing non-electric vehicles.
2. Charging Infrastructure: The company will invest in and maintain necessary charging infrastructure at our facilities to ensure the smooth operation of our electric vehicle fleet. Employees are encouraged to charge vehicles during off-peak hours to optimize energy consumption.
3. Vehicle Procurement: When procuring new vehicles or renewing leases, priority will be given to electric models that are energy-efficient, have a minimal environmental impact, and align with the company's sustainability goals.
4. Training and Awareness: Employees who use company cars will be provided with training on efficient driving practices for electric vehicles, as well as guidance on proper charging techniques and maintenance.
5. Periodic Review: The company will review this policy annually to ensure that it remains in line with the latest technological advancements, best practices in the EV industry, and the company's evolving sustainability goals.

Electric Fleet Cuts Emissions Below 1%

The Group Carbon Emissions can be, with reference to Greenhouse Gas Protocol divided into Scope 1, Scope 2 and Scope 3 can be read from the chart to the right, where Scope 1 and Scope 2 make up less than 1 % of the total emissions based on a best estimate. Scope 1 – Direct emissions come from the 1 diesel car we have in Denmark (the lease is terminated and 1 replacement EV is ordered) and the 7 hybrid cars we have in Denmark and Sweden. Scope 2 emissions come from electricity purchased and used to run our 6 offices across the Nordics for our +80 employees.

Carbon Emissions



Compliance

Employees responsible for vehicle procurement, maintenance, and operation must comply with this policy. Non-compliance may result in corrective actions and possible reassessment of vehicle privileges.

Conclusion

Through this Electric Company Car Policy, we seek to emphasize our dedication to sustainable practices, reduce greenhouse gas emissions, and promote the broader adoption of clean transportation solutions within the corporate sphere.





Organic Dining: Our Policy on Use of Organic Ingredients in the Cafeteria

In our ongoing efforts to prioritize health and sustainability, we present the "Organic Dining" policy. This initiative outlines our commitment to using organic ingredients in our cafeteria, reflecting our belief in the interconnectedness of personal well-being and environmental responsibility. We encourage you to explore how we are translating this belief into tangible actions in our daily dining experiences.

Purpose

This policy underscores our dedication to promoting health and sustainability by ensuring that all ingredients used in our cafeteria are organic.

Scope

This policy is applicable to all food procurement, preparation, and serving processes within our company's cafeteria. This policy regards all the canteens that we run and operate, where the majority of our employees consume their food. Where SEC DATACOM do not own the canteen, we encourage our employees to eat healthy and organic.

Policy Statement

1. Organic: The majorities of ingredients purchased and used for meals in the cafeteria will be organic. This means they are grown without synthetic pesticides, fertilizers, and are not genetically modified.
 2. Supplier Verification: We will only partner with suppliers who can provide certifications or other verifiable proof that their products are genuinely organic. Regular checks and audits of suppliers will be conducted to ensure compliance.
 3. Promotion of Organic Consumption: The cafeteria will also carry informational materials on the benefits of organic consumption, aiming to educate employees and promote healthier eating habits.
 4. Seasonal Menus: Recognizing that organic produce can be seasonal, our cafeteria will prioritize creating menus that align with the availability of organic ingredients during specific times of the year.
 5. Regular Review: The procurement team will routinely review the quality and sources of organic ingredients to ensure we are getting the best products while also receiving value for money.
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Compliance

Cafeteria staff and procurement personnel must adhere strictly to this policy. Regular training and updates will be provided to ensure awareness and adherence. Non-compliance will result in corrective actions.

Conclusion

With this policy, we aim to not only provide healthier meal options for our employees but also reduce our environmental footprint. We believe that by choosing organic, we are making a responsible choice for both people and the planet.





Anti-Food Waste Program Policy

To further our commitment to sustainability and responsible consumption, we introduce the "Anti-Food Waste Program Policy". This policy offers a structured approach to managing food wastage within our company's dining facilities, enabling employees to take an active role in our environmental efforts. Dive in to discover how we are ensuring that good food doesn't go to waste, while fostering a culture of mindful consumption.


Purpose

To promote sustainability and reduce food wastage, this policy outlines the procedures and guidelines for employees to responsibly take home leftovers from the workplace. Bio waste stemming from food production, which is not distributed to employees, is systematically separated from other waste for the explicit purpose of reuse and recycling.

Scope

This policy applies to all company-operated dining facilities and catered events within the organization.

Policy Statement

1. Identification of Leftovers: At the end of each mealtime or event, the kitchen staff will identify food items that can be safely consumed later. These items will be separated and prepared for employees to take home.
 2. Safe Packaging: The cafeteria will provide suitable containers for packing leftovers, ensuring food safety standards are maintained. Employees are encouraged to bring their reusable containers to further reduce waste or return the supplied containers for reuse.
 3. Fair Distribution: To ensure equitable distribution, employees wishing to take leftovers home must express their interest in advance, and a system will be in place to ensure a fair allocation of available food.
 4. Food Safety: Employees must adhere to food safety guidelines when taking and storing leftovers. The cafeteria staff will provide guidance on proper storage and reheating to prevent foodborne illnesses.
 5. Feedback Mechanism: Employees are encouraged to provide feedback on the quality and quantity of leftovers, allowing the kitchen to adjust meal preparations and reduce waste proactively.
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Compliance

All employees participating in the program must abide by the policy's guidelines. Failure to do so may result in being excluded from the program.

Conclusion

This Anti-Food Waste Program Policy not only aims to reduce waste but also promotes responsible consumption among employees. It's a testament to our commitment to sustainability and social responsibility.





Battery and Electronic Waste Recycling Policy

To champion sustainability, our organization introduces the Battery and Electronic Waste Recycling Policy. This ensures responsible disposal of batteries and electronic waste. By adhering to these guidelines, we underline our commitment to environmental responsibility. Read on for detailed procedures and roles.


Purpose

To reduce our environmental impact and promote responsible waste management, this policy establishes guidelines for the recycling of batteries and similar electronic waste within our organization.

Scope

This policy applies to all departments and personnel across the organization, covering the proper disposal and recycling of batteries and related electronic waste.

Policy Statement

1. **Battery Collection:** All used batteries, regardless of type or size, should be deposited in designated collection bins or areas, rather than with general waste.
 2. **Electronic Waste Collection:** Similar electronic items, including used cell phones, chargers, and other small electronics, should also be disposed of in the designated recycling bins or areas.
 3. **Recycling Stations:** Recycling stations for batteries and electronic waste have been set up at the office. Employees are encouraged to utilize these stations and ensure that waste is placed in the correct bin.
 4. **Safe Handling:** All employees handling these waste items must ensure they do so safely, keeping in mind potential hazards like leaking battery acid.
 5. **Awareness and Training:** Periodic training sessions will be conducted to educate employees about the importance of recycling batteries and electronic waste, as well as the correct procedures for doing so.
 6. **Periodic Review:** The company will review the effectiveness and efficiency of this policy annually, ensuring that recycling practices align with the latest standards and recommendations.
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Compliance

Employees are required to comply with this policy, ensuring proper disposal and recycling of batteries and related electronic waste. Non-compliance may lead to corrective actions.

Conclusion

Through this Battery and Electronic Waste Recycling Policy, we aim to foster a culture of sustainability and responsible waste management within our organization, while also contributing to broader environmental conservation efforts.





FOSTERING EMPLOYEE VITALITY AND UNITY: OUR COMMITMENT TO HOLISTIC WELL-BEING

At SEC DATACOM, we recognize the importance of integrating environmental considerations into our operations. With policies spanning from electric vehicle adoption to organic dining, we're taking measured steps to align our practices with broader environmental goals. Dive into our approach to understand how we are working to make a difference for our environment.

The Employee Fitness and Wellness Policy

At SEC DATACOM, our employees are at the heart of our organization, and their well-being is a top priority. We are committed to providing a work environment that fosters not only professional growth but also the overall health and welfare of our team members. Our approach to employee well-being is multifaceted, encompassing various aspects of work-life balance, health, and safety. In this section, we will outline the key strategies and initiatives we have in place to ensure our employees' physical, mental, and emotional well-being.

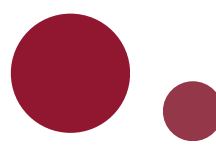
Purpose

To promote health and well-being among our employees, we have established this policy which ensures that fitness facilities are available and encourages regular physical activity.

Scope

This policy applies to all employees of the company, regardless of their position or tenure. This policy applies to the majority of our employees. Where SEC DATACOM do not own fitness facilities, we aim to provide alternative fitness and wellness offerings ex. employer paid fitness membership.





Policy Statement

1. Fitness Facilities:

- We provide on-site fitness facilities that are accessible to all employees during designated hours.
- These facilities are equipped with various exercise machines, free weights, and space for aerobics or yoga.

2. Scheduled Classes:

- Group fitness classes are held twice a week. The schedule and type of classes will be communicated in advance, and employees are encouraged to participate.
- Classes are designed to cater to various fitness levels, ensuring that everyone can benefit regardless of their physical capabilities.

3. Safety and Hygiene:

- Employees are required to follow safety guidelines when using the fitness facilities.
- All users must ensure that they handle equipment properly and return them to their designated places after use.
- Proper hygiene should be maintained. Users are required to wipe down machines after use and ensure the area remains clean.

4. Encouraging Participation:

- To foster a culture of health, employees are encouraged to utilize the fitness facilities and attend the scheduled classes.
- From time to time, the company might organize fitness challenges or events to promote healthy competition and camaraderie among employees.

5. Feedback and Suggestions:

- Employees are encouraged to provide feedback on the fitness facilities and classes. Suggestions for improvements or new classes are always welcome.

Compliance

Failure to adhere to safety and hygiene guidelines may result in restricted access to the fitness facilities for the offending employee(s).

Conclusion

The Employee Fitness and Wellness Policy is a testament to our commitment to the health and well-being of our staff. We believe that a healthy employee is a happy and productive one, and we're proud to support our team in their fitness endeavors.





Work-Life Balance Policy

At SEC DATACOM, we prioritize the well-being of our employees, both inside and outside the workplace. Our "Work-Life Balance Policy" reflects our dedication to fostering a supportive work environment that allows our team members to maintain a healthy balance between their professional and personal lives.

Purpose

At SEC DATACOM, we are committed to fostering a work environment that promotes a healthy balance between work and leisure. We recognize the importance of work-life balance in promoting the well-being and productivity of our employees. This policy outlines our approach to achieving this balance through flexible work arrangements.

Scope

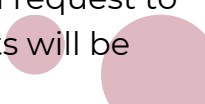
This policy applies to all employees of SEC DATACOM, regardless of their employment status or position within the organization.

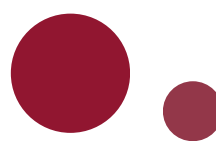
Policy Statement

1. Flexible Work Arrangements:

- SEC DATACOM encourages employees to maintain a healthy work-life balance by offering flexible work arrangements, including remote work options.
- Most employees have the opportunity to work remotely through our digital workplace. This allows them to address personal matters without the need to take extended time off during regular working hours.

2. Remote Work:

- Remote work may be approved for eligible employees based on the nature of their roles and job responsibilities.
 - Employees seeking remote work options must submit a formal request to their immediate supervisor for review and approval. Such requests will be considered on a case-by-case basis.
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3. Planning and Communication:

- Employees utilizing remote work options are expected to plan their work schedules in consultation with their supervisors to ensure the continuity of work operations and team collaboration.
- Effective communication and accessibility during working hours are essential. Employees must be reachable and responsive to work-related inquiries and discussions.

4. Performance Expectations:

- Remote employees are expected to maintain the same level of performance and productivity as when working from the office.
- Supervisors will regularly assess remote employees' performance and address any concerns promptly.

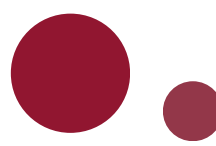
5. Data Security and Confidentiality:

- Remote employees must adhere to all company policies regarding data security and confidentiality. They are responsible for safeguarding company information and ensuring that it is not compromised in any way.

6. Termination of Remote Work Arrangements:

- SEC DATACOM reserves the right to terminate remote work arrangements at any time based on business needs or performance-related issues.
- Employees may also request to discontinue their remote work arrangements with reasonable notice.





Conclusion

SEC DATACOM is committed to promoting a work environment that supports the well-being of our employees by offering flexible work arrangements. We believe that a balanced approach to work and leisure contributes to the overall success of our organization and the happiness of our workforce.

This policy aims to provide clear guidelines for the implementation of flexible work arrangements and remote work options while maintaining performance expectations and data security. We encourage open communication between employees and supervisors to ensure the successful implementation of these measures.





Diversity and Gender Inclusivity Policy

At SEC DATACOM, we are dedicated to fostering a diverse and inclusive environment with an acute focus on enhancing gender representation. We are actively seeking to integrate more diversity across all levels of our organization, emphasizing their invaluable perspectives and roles. Dive into our guidelines to see how we are championing equality, empowerment, and growth.

Purpose

This policy underscores SEC DATACOM's commitment to fostering diversity and gender inclusivity within our offices and board. Recognizing the intrinsic value of a diverse workforce and leadership, we strive to create an environment where all individuals, regardless of their gender, feel valued, respected, and empowered.

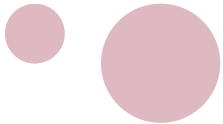
Scope

This policy applies to all employees, management, and board members of SEC DATACOM.

Gender demographics

Within SEC DATACOM Group A/S, the composition of the board of directors is 75% male and 25% female members. This gender distribution is mirrored in the board of directors of SEC DATACOM A/S. Furthermore, 33% of the Country Managers within the organization are female.

Breaking down the gender demographics across SEC DATACOM's subsidiaries:

- In SEC DATACOM A/S, 21% of the total headcount of 37 employees are female.
 - In SEC DATACOM AB, 14% of the total headcount of 14 employees are female.
 - In SEC DATACOM AS, 9% of the total headcount of 11 employees are female.
 - In SEC DATACOM OY, there has yet to be hired female employees in the total headcount of 4.
 - In SEC DATACOM Group A/S, there has yet to be hired female employees in the total headcount of 7.
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Policy Statement

1. Commitment to Diversity and Gender Inclusivity: SEC DATACOM believes in promoting a diverse work environment. We recognize that different backgrounds, experiences, and perspectives, particularly those of varying genders, lead to a richer and more creative organizational culture.
2. Gender Representation: We aim for balanced gender representation across all levels of the organization. Special attention will be paid to roles and levels where specific genders are underrepresented.
3. Recruitment and Promotion: Our hiring and promotion processes will always be conducted based on merit, competence, performance, and potential. We will strive to ensure that these processes are free from biases related to age, gender, ethnicity, religion, disability, or any other discriminatory factors.
4. Board Composition: We are committed to ensuring that our board represents a diverse mix of backgrounds, experiences, and skills. Ensuring balanced gender representation in our board is a priority, as we believe it contributes to more effective and balanced decision-making.
5. Reporting and Monitoring: A periodic review will be conducted to monitor our progress towards achieving our diversity and gender inclusivity goals, and findings will be reported to senior management.
6. Training and Awareness: All employees and board members will undergo diversity, gender inclusivity, and anti-discrimination training to ensure they understand the benefits of a diverse and gender-balanced workplace and can contribute to our inclusive culture.

Gender Balance Goals: The Group's Target for 33% Women in Leadership by 2028

Our core policy commits to hiring or promoting the most qualified individuals, irrespective of gender, race, religion, skin color, sexual orientation, or other unrelated characteristics. Historically, leadership roles within our organization have been male-dominated, mirroring the gender skew in our applicant pool. This has posed challenges to achieving gender parity. We are continuously refining our policy to bolster gender equality. We have set specific goals, aiming for a leadership composition of 33% women and 67% men by 2028.



Compliance

All employees, including management and board members, are expected to uphold the principles outlined in this policy. Non-compliance may lead to corrective actions.

Conclusion

SEC DATACOM is dedicated to creating a workplace that truly represents the diversity of our society. Gender inclusivity is pivotal in driving our organization's success. Through this policy, we cement our commitment to ensuring that diversity and gender inclusivity are interwoven into the fabric of our company, from the office floors to the boardroom.





Workplace Safety Policy

At SEC DATACOM, the safety and well-being of our employees stand paramount. We are steadfastly committed to creating and maintaining a hazard-free environment where every individual feels protected and can perform their best.

Purpose

The primary goal of this policy is to ensure that all employees of our company can work in a safe and secure environment, free from potential hazards and risks. We recognize that a safe workplace is fundamental to the health and well-being of our employees and is crucial for optimal productivity and morale.

Scope

This policy applies to all employees, contractors, visitors, and stakeholders engaged with or within our company's premises and operations.

Policy Statement

1. Risk Assessment: We will conduct regular workplace risk assessments to identify and eliminate potential hazards. This includes assessments of equipment, work processes, and general work environments.
2. Emergency Protocols: Clear emergency procedures will be in place, and employees will be trained on these protocols. This includes fire drills, evacuation plans, and first-aid procedures.
3. Reporting Mechanism: Employees are encouraged to report any safety concerns or potential hazards immediately. A transparent and confidential mechanism for reporting will be maintained to ensure that issues are addressed promptly.
4. Regular Audits: Safety audits will be carried out periodically to ensure that all safety standards are consistently met and to identify areas for improvement.



Compliance

All employees are required to adhere to this Workplace Safety Policy. Non-compliance may result in corrective actions, up to and including termination for severe or repeated violations.

Conclusion

Safety at the workplace is a shared responsibility. While the company pledges to provide a safe environment, employees are also urged to play an active role in maintaining and promoting safety. Together, we can ensure that our workplace remains a haven of security and well-being for everyone.





Our Health & Insurance Policy: Prioritizing Employee Welfare

At SEC DATACOM, we profoundly understand the integral role our employees play in our success. Recognizing their dedication, we have designed a robust suite of benefits that holistically caters to their well-being, health, and long-term financial security.

Purpose

This policy serves to elaborate on the extensive pension and health benefits that SEC DATACOM provides. Our goal is to ensure clarity, transparency, and a thorough understanding of the entitlements and provisions available.

Scope

Eligibility: All regular full-time employees of SEC DATACOM.

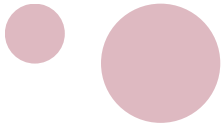
Coverage: The benefits cover various circumstances, including:

- Loss of capacity to work
- Critical illness diagnosis
- Unexpected passing
- Medical examinations and treatments
- Retirement preparedness and transition

Extended Benefits: Beyond the primary provisions, employees can access value planning services and will preparation at preferential rates.

Policy Statement

It is the firm stance of SEC DATACOM to offer a comprehensive pension and health agreement to all its employees. We're committed to ensuring that our team remains protected, supported, and well-prepared for diverse life scenarios, ranging from unforeseen health challenges to retirement readiness.



Compliance

1. Entitlement: All employees falling within the scope are automatically entitled to the benefits laid out in this policy.
2. Management & Oversight: The HR department has the mandate to execute, supervise, and ensure strict adherence to this policy.
3. Queries & Concerns: Employees are encouraged to direct any questions or discrepancies related to their benefits to the HR department.
4. Policy Review: An annual assessment will be undertaken to ascertain the policy's efficacy and alignment with the organization's objectives and values.

Conclusion

We are steadfastly committed to creating an environment that prioritizes the health, overall well-being, and financial security of our employees through dedicated healthcare provisions and pension insurance. This policy highlights our dedication, and we emphatically encourage our esteemed team members to make the most of the comprehensive healthcare services and pension insurance benefits tailored for them.





Social Relationship Enhancement Policy

In today's dynamic workplace, strong connections are vital. At SEC DATACOM, we recognize that professional growth is intertwined with the relationships we build. That is why we introduce our Social Relationship Enhancement Policy, highlighting our dedication to cultivating camaraderie, understanding, and unity among our team. Explore how we're strengthening these bonds.


Purpose

The objective of this policy is to promote and nurture strong interpersonal relationships among employees, fostering a cohesive and harmonious work environment.

Scope

This policy applies to all employees, regardless of their position or tenure within the company.

Policy Statement

1. Regular Events: The company will organize regular events aimed at bringing employees together in a casual setting. These events may include team-building activities, workshops, informal get-togethers, or other engagement initiatives.
 2. Event Participation: While participation in these events is encouraged, it remains voluntary. Employees should feel comfortable and not pressured to attend.
 3. Event Planning: A committee or designated team will be responsible for planning and executing these monthly events. Employee suggestions and feedback will be actively sought to ensure the events cater to diverse interests.
 4. Feedback Mechanism: After each event, participants will be encouraged to provide feedback to ensure continuous improvement and address any concerns.
 5. Budget: A specified budget will be allocated for these events to ensure they are executed without compromising on quality and engagement.
 6. Inclusivity: The events will be designed to be inclusive, catering to the diverse backgrounds, interests, and needs of all employees.
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Compliance

Employees are urged to maintain professionalism and respect for their colleagues during these events. Any inappropriate behavior or misconduct will be addressed according to the company's disciplinary policy.

Conclusion

By holding regular events, the company aims to strengthen social bonds, promote collaboration, and enhance the overall workplace atmosphere. Through this policy, we affirm our commitment to fostering a connected and unified workforce.





SEC DATACOM Harassment and Violations Policy

In today's dynamic workplace, strong connections are vital. At SEC DATACOM, we recognize that professional growth is intertwined with the relationships we build. That is why we introduce our Social Relationship Enhancement Policy, highlighting our dedication to cultivating camaraderie, understanding, and unity among our team. Explore how we are strengthening these bonds.

Purpose

The purpose of this policy is to establish guidelines and procedures for preventing, reporting, and addressing sexual harassment and violations within SEC DATACOM. We are committed to maintaining a workplace that is free from such behavior and ensuring the well-being of all employees.

Scope

This policy applies to all employees, contractors, vendors, clients, visitors, and any other individuals associated with SEC DATACOM.

Policy Statement

1. Zero Tolerance:

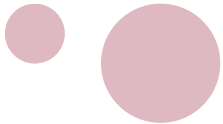
- SEC DATACOM maintains a zero-tolerance approach towards sexual harassment, misconduct, and violations. Such behavior is strictly prohibited and will not be tolerated under any circumstances.

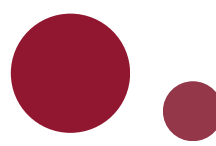
2. Definitions:

- Sexual harassment includes unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
- Violations refer to any actions or behaviors that breach company policies or standards of conduct in a sexual or non-consensual manner.

3. Reporting:

- Any employee who experiences or witnesses sexual harassment or violations is encouraged to report the incident immediately.
- Reports can be made to a supervisor, manager, HR department, or through a designated reporting channel.
- The company will maintain confidentiality to the extent possible during the investigation process.





4. Investigation:

- All reports will be thoroughly and impartially investigated.
- Investigations will be conducted promptly, and all parties involved will be treated with respect and fairness.
- Employees are expected to cooperate fully in the investigation process.

5. Consequences:

- Any employee found to have engaged in sexual harassment or violations will be subject to disciplinary actions, including verbal or written warnings, suspension, or termination, depending on the severity and recurrence of the behavior.
- Legal action may be taken against individuals who engage in unlawful activities.

6. Non-Retaliation:

- SEC DATACOM prohibits any form of retaliation against employees who report sexual harassment or violations.
- Retaliation claims will be treated seriously and will result in disciplinary action against the offender.

7. Prevention and Training:

- We are committed to preventing sexual harassment and violations through education and awareness.
- All employees will receive training on this policy and their rights and responsibilities.

8. Review and Improvement:

- This policy will be reviewed periodically to ensure its effectiveness and relevance.
- SEC DATACOM will continuously strive to improve measures for preventing and addressing sexual harassment and violations.



Compliance

All employees are expected to adhere to this policy. Failure to comply may result in disciplinary actions, up to and including termination of employment. Contractors, vendors, and other individuals associated with SEC DATACOM are also expected to adhere to these principles when present within our premises.

Conclusion

SEC DATACOM is committed to maintaining a workplace free from sexual harassment and violations. Through the diligent enforcement of this policy, we aim to create a safe and respectful environment that fosters the well-being and dignity of all employees and stakeholders.





SEC DATACOM: EMBEDDING ETHICAL INTEGRITY AND CORPORATE COMPLIANCE IN OUR ORGANIZATIONAL BLUEPRINT

At SEC DATACOM, we hold ethical conduct and responsible business practices in the highest regard. These principles are not just aspirational goals; they are deeply embedded in our organizational DNA. Our unwavering commitment to corporate compliance and anti-corruption initiatives is the bedrock upon which our values and operations are built.

We believe that ethical conduct is not merely a legal obligation but a moral imperative. It is a fundamental aspect of our identity and the driving force behind our every action. We understand that ethical behavior is not just a matter of ticking boxes or following regulations; it is a reflection of who we are as a company and the standards we set for ourselves. In the forthcoming chapter, you will find a comprehensive overview of the measures we have implemented to enforce these principles effectively.

Privacy Policy: Our Commitment to Responsible Data Handling

At SEC DATACOM, your privacy is of utmost importance. This Privacy Policy is designed to explain how we handle and protect your personal data, ensuring that it is used responsibly and in accordance with applicable regulations, such as the General Data Protection Regulation (GDPR). We are committed to safeguarding your personal information and providing you with transparency about how we collect, use, and secure your data.

Purpose

At SEC DATACOM, we value your privacy and are committed to protecting your personal data. This Privacy Policy outlines how we, as a data controller, handle and process the personal data we collect in accordance with the General Data Protection Regulation (GDPR).

Scope

This policy applies to all instances in which SEC DATACOM processes personal data.



Policy Statement

1. Definitions

- Personal data: Any information that can identify a person directly or indirectly, including names, identification numbers, location data, or online identifiers.
- Data Controller: SEC DATACOM, responsible for processing your personal data.
- Data Processor: Trusted third parties who assist us in conducting our business and providing services.

2. Categories of Personal Data We Collect

We collect personal information that you actively provide to us through various forms, such as when ordering products, signing up for events, submitting job applications, or other interactions. The categories of personal data we collect may include, but are not limited to, names, contact details, and job-related information.

3. Use of Personal Data

We process personal data to provide you with a personalized experience, improve customer support, and deliver relevant information, updates, and news. We use personal data only for specified purposes and ensure that it remains accurate and up-to-date.

4. Storage of Personal Data

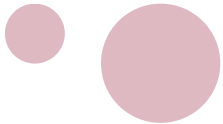
SEC DATACOM has internal security measures to protect personal data against loss, destruction, or unauthorized access. We will delete personal data when it is no longer needed for the original purpose or at your request.

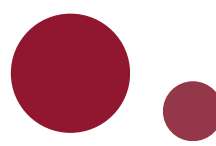
5. Sharing of Personal Data

We do not sell, trade, or transfer personal data to third parties except trusted processors who agree to keep the data confidential. Personal data may be transferred between countries in which we operate, always in compliance with GDPR.

6. Purpose of Processing Personal Data

We process personal data to provide a personalized experience, offer effective customer support, and send information about our products, services, events, and newsletters.





7. Responsibility for Information Sent Out Based on Personal Data

SEC DATACOM is responsible for information sent directly to recipients. We are not responsible for forwarded information conducted by third parties.

8. Cookies

We use cookies to enhance user experience on our website and eShop. You can manage cookies through your browser settings, but blocking cookies may affect website functionality.

9. Changes to Our Privacy Policy

SEC DATACOM reserves the right to update this Privacy Policy. It is advisable to regularly review the latest version.

10. Your Personal Rights

You have the right to access, correct, and request deletion of your personal data. Contact us with any requests or concerns regarding your personal data.

11. How to Contact Us

For privacy-related inquiries or requests, please contact us at nyheder@secdatacom.dk.

Compliance

All SEC DATACOM employees must comply with this Privacy Policy. Non-compliance may result in corrective actions.

Conclusion

By adopting this Privacy Policy, SEC DATACOM emphasizes its commitment to data protection and GDPR compliance while respecting individuals' privacy rights.





Anti-Corruption Policy

At SEC DATACOM, we are guided by unwavering principles of ethics and integrity in all our business endeavors. Corruption is a menace that erodes trust, stifles development, and tarnishes our global society. In our commitment to uphold the highest standards of ethical conduct, we introduce our Anti-Corruption Policy. This policy serves as a beacon, illuminating our dedication to combat corruption in all its forms and uphold transparency in every facet of our operations. Explore the tenets of our policy and join us in the fight against corruption.

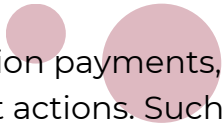
Purpose


At SEC DATACOM, we are steadfast in our commitment to conducting business with the highest ethical standards. Corruption undermines trust, damages our reputation, and hinders economic development. This Anti-Corruption Policy is designed to guide our employees and representatives in preventing and combating corruption in all our operations and interactions.

Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents, and anyone acting on behalf of SEC DATACOM, regardless of their position or location.

Policy Statement

1. **Zero Tolerance:** SEC DATACOM has a zero-tolerance approach to corruption in any form, including bribery, embezzlement, extortion, and other illicit practices.
 2. **Compliance with Laws:** We will comply with all applicable anti-corruption laws and regulations, including the Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and other relevant international and local laws.
 3. **Gifts, Hospitality, and Donations:** Offering, giving, receiving, or soliciting gifts, hospitality, or donations must always be in compliance with applicable laws and company policies. We will not use these as a means to gain undue advantage or influence.
 4. **Facilitation Payments:** SEC DATACOM strictly prohibits facilitation payments, which are small payments made to expedite routine government actions. Such payments are illegal and against our policy.
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5. Political Contributions: We will not make political contributions or engage in political activities that could be seen as corrupt, unethical, or contrary to our values and policies.

6. Third-Party Due Diligence: Before engaging with third parties, such as suppliers, agents, and business partners, we will conduct due diligence to assess their integrity and compliance with anti-corruption standards.

7. Financial Record Accuracy: All financial records must accurately and transparently reflect transactions and expenditures. False or misleading records are not tolerated.

8. Reporting and Non-Retaliation: We encourage all employees to report any suspected or observed acts of corruption or violations of this policy. SEC DATACOM prohibits retaliation against whistleblowers.



9. Training and Awareness:

We are committed to providing regular anti-corruption training to our employees and representatives to ensure they understand the risks of corruption and their responsibilities under this policy.

Compliance

The Compliance Officer is responsible for monitoring and enforcing this policy. Any suspected violations will be thoroughly investigated, and appropriate actions will be taken.

Violations of this policy may result in disciplinary action, up to and including termination of employment or contractual relationship. Legal action may also be pursued against individuals involved in corrupt practices.

Conclusion

SEC DATACOM is dedicated to conducting business ethically, transparently, and with integrity. We believe that by adhering to this Anti-Corruption Policy, we can contribute to a world where corruption is eradicated, trust is built, and sustainable growth is achieved. Together, we can ensure that our operations remain free from corruption and aligned with our core values.



Whistleblower Policy

At SEC DATACOM, we stand firm in our commitment to ethical conduct and accountability. Our Whistleblower Policy empowers everyone within our organization, including employees, contractors, and stakeholders, to report any suspicions of illegal, unethical, or irregular activities. This policy ensures confidential reporting and safeguards against retaliation. We encourage a culture of openness, integrity, and transparency. Your reports are essential in upholding our high standards of ethics and compliance. Together, we can ensure SEC DATACOM remains a beacon of ethical excellence.

Purpose

SEC DATACOM is committed to maintaining the highest standards of ethics, integrity, and compliance in all aspects of its business operations. The purpose of this Whistleblower Policy is to establish a framework for employees, contractors, and other stakeholders to report any concerns regarding illegal, unethical, or irregular activities within the organization. This policy ensures that such reports can be made confidentially and without fear of retaliation.

Scope


This policy applies to all employees, contractors, vendors, and stakeholders associated with SEC DATACOM.


Policy Statement

1. Reporting Mechanism:

- SEC DATACOM encourages the reporting of any concerns related to illegal, unethical, or irregular activities. This includes but is not limited to corruption, bribery, fraud, over/underbilling, embezzlement, workplace safety violations, harassment, or breaches of the law.
- Reports can be made through the designated reporting channels provided below. The reporting channel is available 24/7 and 365 days a year.

2. Confidentiality and Non-Retaliation:

- All reports made under this policy will be treated confidentially to the extent permitted by law. SEC DATACOM will take all reasonable measures to protect the identity of the whistleblower.
 - SEC DATACOM strictly prohibits retaliation against individuals who report concerns in good faith. Any form of retaliation is a violation of this policy and will result in disciplinary action.
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3. Investigation and Resolution:

- Reported concerns will be promptly and thoroughly investigated by the appropriate internal or external parties, as deemed necessary. The investigation will be conducted impartially and fairly.
- SEC DATACOM is committed to taking appropriate corrective actions in response to the findings of the investigation. This may include legal action, internal disciplinary measures, or process improvements to prevent future occurrences.

4. Anonymous Reporting:

- While SEC DATACOM encourages individuals to identify themselves when reporting concerns, anonymous reporting is also accepted. However, individuals making anonymous reports should provide as much detail as possible to facilitate an effective investigation.

Reporting Channels

Reports can be made through the following channels:

- Reporting concerning managers or employees:

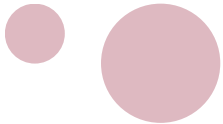
peterf@secdatacom.dk

- For senior or executive management whistleblowers, we have an external reporting channel which ensures independence, confidentiality, and underscores the organization's commitment to transparency and accountability:

vagn.thorup@vthlaw.dk

Conclusion

SEC DATACOM values the integrity and well-being of its employees and stakeholders. This Whistleblower Policy demonstrates our commitment to maintaining a transparent and ethical organizational culture. We encourage all individuals to come forward with their concerns, knowing that they will be heard, protected, and treated with utmost confidentiality.





Human Rights and Supplier Chain Responsibility Policy

At SEC DATACOM, we are committed to upholding the principles of human rights and ensuring the well-being of individuals at every level of our operations. We recognize that our social responsibility extends to our supply chain, where the risk of human rights impacts is often the highest.

Purpose


This policy outlines our commitment to respecting and supporting internationally recognized human rights as articulated in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO).

Scope

This policy applies to all employees and stakeholders involved in SEC DATACOM's operations, including suppliers, producers, and subcontractors.

Policy Statement

1. **Respect for Human Rights:** SEC DATACOM is dedicated to respecting the human rights of all individuals, regardless of their affiliation with our organization. We commit to upholding these rights throughout our supply chain.
 2. **Adherence to International Standards:** We recognize and adhere to the principles of the UN Universal Declaration of Human Rights and the core conventions of the ILO, which encompass areas such as labor rights, freedom of association, non-discrimination, and fair wages.
 3. **Supplier Assessment:** We conduct regular risk assessments of our supplier and producer chain to identify and mitigate potential human rights risks. This includes evaluating labor practices, workplace conditions, and other factors that could impact human rights.
 4. **Due Diligence:** SEC DATACOM ensures that human rights considerations are an integral part of our procurement and supplier management processes. We take measures to assess, monitor, and address human rights risks in our supply chain.
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5. Collaboration and Engagement: We engage with our suppliers, producers, and subcontractors to promote human rights awareness and compliance. We work collaboratively to address any identified issues and encourage continuous improvement.

6. Reporting and Transparency: We are committed to transparency regarding our efforts to respect human rights in our supply chain. We report on our progress in our annual sustainability reports.

7. Remediation: In cases where human rights violations are identified, we work with suppliers and producers to develop corrective action plans to rectify the situation promptly.

8. Non-Retaliation: We ensure that individuals who report human rights concerns in good faith are protected from any form of retaliation.


Compliance



Compliance with this Human Rights and Supplier Chain Responsibility Policy is mandatory for all employees and stakeholders involved in SEC DATACOM's operations. Non-compliance may result in corrective actions, including the termination of business relationships.

Conclusion

At SEC DATACOM, we are dedicated to maintaining the highest standards of human rights across our supplier and producer chain. Through our commitment to this policy, we aim to create a supply chain that upholds the principles of dignity, respect, and fairness for all individuals involved, ensuring that human rights are respected and protected.





Employee-Driven Corporate Social Responsibility (CSR) Policy

At SEC DATACOM, we believe that responsible corporate citizenship is essential. Our commitment to CSR extends beyond business and is deeply embedded in our culture. We empower our employees to drive positive change, and this policy outlines our approach.

Our employees are at the center of our CSR efforts. They drive our business success and identify causes that align with our values. Through initiatives, partnerships, and fun projects we aim to create a lasting impact. Our CSR journey is about continuous improvement, transparency, and shared responsibility. Join us in making a meaningful difference in the world and working towards a better, sustainable future.

Purpose

At SEC DATACOM, we recognize the importance of corporate social responsibility (CSR) and the positive impact it can have on society. Our CSR initiatives are guided by the principle that it is our employees who best understand the causes and projects that align with our values and culture. This policy outlines our commitment to supporting causes and projects driven by our employees.

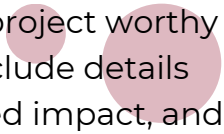
Scope

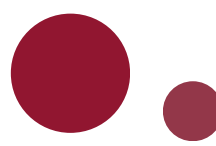
This policy applies to all employees of SEC DATACOM and outlines the process by which employees can propose, evaluate, and champion CSR projects or causes that the company may choose to support.

Policy Statement

1. Employee-Driven CSR: We believe that empowering our employees to choose and lead CSR initiatives fosters a greater sense of commitment, enthusiasm, and alignment with the causes we support. We encourage employees to actively engage in CSR activities that resonate with them.

2. Proposal Submission: Any employee who identifies a cause or project worthy of company support may submit a proposal. Proposals should include details about the cause or project, its alignment with our values, expected impact, and any relevant information.





13. Evaluation and Selection: All submitted proposals will be evaluated by a CSR committee or designated group within the company. This committee will assess the proposals based on their alignment with our CSR goals, feasibility, impact, and alignment with company values.

4. Employee Champion: If a proposal is approved, the proposing employee becomes the champion for the cause or project. They will be responsible for organizing and leading related activities, fundraising efforts, and coordinating with external partners if necessary.

5. Transparency and Reporting: We are committed to maintaining transparency in our CSR efforts. Progress and outcomes of supported projects will be periodically communicated to all employees. This includes sharing success stories and lessons learned.

6. Resources and Support: SEC DATACOM will allocate reasonable resources and support to the approved CSR initiatives. This may include financial contributions, volunteer time off, or other resources deemed appropriate.

7. Alignment with Core Values: CSR initiatives should align with our core values and not compromise our integrity, ethics, or brand reputation.

Compliance

All employees are encouraged to adhere to this policy when proposing or participating in CSR initiatives. Non-compliance with this policy may result in a review of an employee's ability to champion or participate in future CSR projects.

Conclusion

Through our Employee-Driven CSR Policy, we aim to create a culture where our employees are actively engaged in making a positive impact on society. We believe that by entrusting our employees to identify and lead CSR initiatives, we can collectively contribute to causes that matter most to us and the communities we serve.





SEC DATACOM SUPPLIER CODE OF CONDUCT

Purpose

The purpose of this policy is to ensure that all partners within our supply chain comply with our supplier code of conduct. This policy sets forth our expectations and standards for responsibility, ethics, and sustainability, promoting a responsible and ethical business environment throughout our supply chain.


Scope

This policy applies to all partners and suppliers engaged in business activities with our company. It encompasses the entire supply chain, including suppliers of goods, services, and materials. We expect all partners to comply with our supplier code of conduct and actively promote responsible business practices within their own operations.

Policy Statement

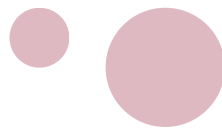
Our company expects all partners within our supply chain to uphold our supplier code of conduct. We are committed to working with socially responsible and ethical suppliers who demonstrate compliance with applicable laws and regulations, as well as respect for human rights, fair labor practices, and environmental sustainability.

We expect our partners to:

1. Comply with all applicable laws, regulations, and standards in their respective fields of business.
 2. Respect and protect workers' rights, ensuring safe and healthy working conditions free from forced labor, child labor, and discrimination.
 3. Conduct business with integrity, avoiding corruption, bribery, fraud, and disloyal practices.
 4. Promote environmental responsibility by minimizing their ecological footprint and adopting sustainable practices.
 5. Cooperate with our company by providing relevant documentation and information to demonstrate compliance with our supplier code of conduct.
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Failure to meet these expectations may result in appropriate actions, including the reassessment of the business relationship. We believe that working collaboratively with our partners will contribute to a sustainable and responsible supply chain, benefiting our stakeholders and the broader community. By adhering to this policy, we aim to foster a culture of respect, integrity, and sustainability, creating long-term value for our company, partners, and the communities in which we operate.



Thank you for reading!

Dear reader,

As we move forward, we extend our sincere gratitude to you for taking the time to learn more about our policies and initiatives. Your interest and support are integral to our collective efforts in creating a positive impact. We invite you to join us in this shared responsibility for a brighter and more sustainable future. Thank you for your commitment to positive change."

As we conclude, SEC Datacom Group A/S remains steadfast in its commitment to making a positive impact on the world. Our unwavering dedication to corporate social responsibility is embedded in our core values, driving us to not only meet business objectives but to exceed them by prioritizing the well-being of our planet and humanity. Through carefully crafted policies and purposeful initiatives, we strive to foster a sustainable and ethical business environment. By adopting a comprehensive CSR strategy, we aim not only to mitigate harm but to actively contribute to the betterment of society and the environment.