

Issue	CR Policy
Version	12
Responsible	Nicolaj Ulnits
Approved	Group Executive Management
Valid from	January 1, 2019



*Lovpligtig redegørelse for samfundsansvar, jf. årsregnskabslovens § 99a
Redegørelsen udgør samtidig en bestanddel af ledelsesberetningen i virksomhedens årsrapport 2019*

*Statutory report on social responsibility, pursuant to årsregnskabsloven § 99a
The report is also part of the management report of the company's annual report 2019*

Table of contents

Opening	3
1. About GPV	3
1.1. Business and operating principles	3
1.2. Code of Conduct	4
2. Corporate Responsibility (CR)	4
2.1. Workplace	4
2.2. Safety	4
2.3. Health	5
2.4. Quality	5
2.5. Environment and climate	5
3. Respect of other people, cultures and equal employment opportunities	6
3.1 Discrimination	6
3.2. Freedom of association	6
3.3. Child labour	6
4. Corruption	6
5. External relations	6
5.1. Community relations	6
5.2. Suppliers and collaborators	7
6. Implementation	7
6.1 General and extraordinary CR Activities 2019	7
6.2 Working Environment	8
6.3 Human Rights	8
6.4 Corruption, Anti Bribery and Business Ethics	8
6.5 Environmental Issues	8
6.6 Gender Composition	8
6.7 GPV CR Index	9

OPENING

By this policy GPV group declares that we intend to meet a wide range of Corporate Responsibility (CR). As of 2018 the title of this policy has changed from Corporate Social Responsibility (CSR) to Corporate Responsibility (CR). This reflects that GPV consider responsibility and sustainability to go beyond the social elements.

The policy underlies the yearly goals set by the executive management. The goals achieved during the past year as well as effort for the coming year will appear from the annual follow up on agreed KPIs and their annual targets.

GPV's production sites are certified within various standards* relating to Corporate Responsibility including

- ISO 14001
- OHSAS 18001
- TLS 8001
- ISO 50001

In addition this policy requires as a minimum to fulfil the principles in UN Global Compact.

*Please go to <https://www.gpv-group.com/media/certificates/> to see certificate for each site.

1. ABOUT GPV

1.1. Business and operating principles

GPV is a knowledge based outsourcing partner with specialist capabilities within high technology and complex manufacturing.

GPV delivers complete solutions or components and works together with global oriented customers in the segments Instruments and Industry, Cleantech, Transport and Medtech.

GPV is a global EMS-partner specialised within high-mix/low-medium volume EMS with more than 50 years of experience and industry insights. We help our customers realize their accomplishments and competitive position through superior technological know-how. Our more than 4,000 employees deliver electronics manufacturing, in-house mechanics, cable-harness assembly and box-build, from our production sites in Europe, Asia and the Americas. GPV is founded in Denmark and with Danish headquarters. We comply with local legislation in all the countries in which we operate.

1.2. Code of Conduct

The GPV Group is dedicated to being a responsible employer and a good corporate citizen. The Code of Conduct represents our core values and reflects our continued commitment to ethical business practices and regulatory compliance.

The Code of Conduct for Employees applies to all employees of the GPV Group worldwide, and it is the responsibility of Management and all employees to ensure compliance with this Code of Conduct.

In the event of non-compliance, employees are encouraged and expected to give notice to their direct manager and if necessary directly to the Executive Board, and they are assured that they will suffer no retaliation or other negative consequences in such case. We take a very serious view of any suspicion of breach of GPV's Code of Conduct, and in any cases of non-compliance with the Code of Conduct, we will act.

2. CORPORATE RESPONSIBILITY (CR)

2.1. Workplace

GPV strive to continually improve our work environment. We aim to strengthen and implement a shared corporate culture which is to help us treat all colleagues equally, regardless of culture, history and tradition. If GPV employees have good working conditions and are committed to their work, together we can do the best job possible.

- **Diversity**

In GPV we place the right people in the right job. We are looking for competencies to fill in a certain job regardless of religion, culture, colour of skin, etc.

- **Training and development initiatives**

It is our aim to provide our colleagues with continuous and relevant education and training.

- **Working hours**

In GPV the amount of working hours lives up to the local labour legislation. In situations where law or agreements claim overtime pay or other kind of nuisance bonus, it will be paid.

2.2. Safety

GPV ensures that production in all phases of the supply chain is planned and organized to promote a safe, healthy and responsible working environment. The purpose is to avoid accidents and to ensure that the physical and mental condition of the employees does not deteriorate.

The work at GPV is carried out in accordance with the following principles:

- Risks are controlled and managed at the source

- To the extent commercial feasible, the work is adjusted to fit the individual employee in terms of equipment, as well as work and production methods
- Monotonous work is limited to minimize its impact on the employee's health
- No work methods constitute danger to the employees

GPV makes every effort to ensure that our processes are safe and that high quality standards are maintained throughout the entire supply chain, from incoming raw material to finished goods.

GPV makes every effort to ensure that no employee suffers physical or psychological harm at work.

In terms of prevention of work accidents the plant management must notify any accident to the CEO, who afterwards brings it to the upcoming management meeting for discussion to avoid similar incidents in the future.

2.3. Health

It is important to GPV to have healthy employees. GPV ensures that efforts to improve the general health are part of the GPV way to act.

GPV helps improving the health of its employees by improving the work environment with initiatives targeting an improved well-being.

2.4. Quality

GPV ensures that our suppliers show respect of high product quality and of the environment. GPV inspects and audits significant suppliers at least once a year and visits suppliers with low performance.

Internal quality conditions comply with the industry's highest standards to live up to the terms of the quality certificates GPV has achieved. These certificates are given in the CR report's data sheet.

2.5. Environment and climate

In the production there is a risk of environmental impact by discharging substances into the air, the ground and the water. GPV has no explicit policy to reduce our effects on the climate, but we constantly strive at reducing energy- and water-consumption and focus on recycling of waste materials. GPV complies with all applicable laws and regulations, and our aim is to contribute to sustainable development by focusing on

- Employees
- Environment
- Quality

GPV is ISO 14001 certified which means that we continuously work determinedly and systematically to improve the environment. Every year GPV is evaluated by external auditors.

3. RESPECT OF OTHER PEOPLE, CULTURES AND EQUAL EMPLOYMENT OPPORTUNITIES

Regardless of the country in which we operate, we maintain that the human rights of every individual should be respected and upheld.

3.1 Discrimination

All GPV employees must show respect of the values and cultures of the people with whom GPV works - both internally and externally. As a natural consequence, GPV prohibits discrimination on the basis of sex, race, colour of skin, religion and beliefs, political opinion, sexual orientation, age, handicap or national, social and ethnic origins.

GPV ensures that we do not discriminate when hiring, moving, promoting or dismissing employees, or in connection with pay reviews, training and development or other working conditions. All these elements are based on relevant and objective criteria.

3.2. Freedom of association

GPV does not interfere with the employees' choice of union or other association and respects the employees' right to organise and enter into collective bargaining.

3.3. Child labour

GPV does not accept child labour. GPV is aware of and respects the ban against child labour as expressed in EU Directive 94/33/EC of 22 June 1994 on the protection of young people in the workplace, the UN Convention on Economic, Social and Cultural Rights of 16 December 1966, ILO Convention No. 138 of 26 June 1973 on Minimum Age, ILO Convention No. 182 of 17 June 1999 on the Worst Forms of Child Labour as well as the UN Convention on the Rights of the Child of 20 November 1989.

4. CORRUPTION

As a global company GPV is exposed in Asia, Europe and the Americas - and thereby in different cultures. Each culture has different attitudes towards doing business. As expressed in our Code of Conduct, we pride ourselves of acting credibly and with integrity in all of our operations, and we do not accept or offer bribes.

5. EXTERNAL RELATIONS

5.1. Community relations

GPV is aware of and observes all applicable laws, rules and regulations in the various countries in which we operate. GPV is responsible for understanding these laws, rules and regulations and how they apply to our business and jobs, and for preventing, detecting and reporting instances of non-compliance to the relevant individuals, institutions or authorities.

5.2. Suppliers and collaborators

GPV sources raw materials in different countries. Our ambition is for our suppliers to meet our Supplier Code of Conduct which governs ethical, social and environmental responsibilities. It is essential that customers trust us if we are to sell our products. By acting responsibly, communicating openly and maintaining an on-going dialogue with customers, we create the right conditions for trust.

GPV has a set of ethical guidelines for all colleagues with external supplier relationships (see section 1.2. Code of Conduct)

6. IMPLEMENTATION

A number of the above mentioned issues are implemented by the guidelines established by the management and with flow down to the single management teams in each entity and department. Further GPV code of conduct has been signed by all relevant employees in the organisation. Others are implemented by concrete action plans and ongoing measuring with quarterly follow-up.

As regards to discrimination, child labor, freedom of association and corruption these issues are met to the extent it is possible from the current knowledge. If suspicion appears to the management that any of this is violated, this will be investigated promptly.

On an annual basis an evaluation of the collection of measures take place and targets for the focus areas for the coming year are set by the group management. Data on all measures are collected from each entity quarterly to evaluate the progress and eventually initiate corrective actions. In 2019 the following activities has been completed and planned:

6.1 General and extraordinary CR Activities 2019

Beyond the ongoing measuring a number of initiatives are initiated as a consequence of GPV's due diligence within corporate responsibility. This is to consider as an expression for GPV's willingness to participate as an active player to improve the conditions as part of the surrounding community.

From group level a new and expanded Code of Conduct for employees has been worded to include new perspectives based on inputs from new GPV sites. The employee Code of Conduct applies to the entire company.

The focus on responsibility in the supply chain has also been strengthened in 2019. The Code of Conduct for suppliers compiled in 2018 is now implemented to the GPV Business System. Onwards all suppliers must accept the terms in the Code.

GPV in Sri Lanka showed extraordinary responsibility as a result of the Easter Sunday attack, by supporting long term recovery of some affected families. GPV facilitates 10 orphans children financially for their educational purpose. The same incident caused a blood donation was initiated since the reserve at the National blood

bank was used up. Total of 90 Pints of blood was symbolizing the enthusiasm and eagerness of our employees toward this worthy cause.

As previous years GPV Thailand has again in 2019 offered donations for charity projects. Sport uniforms were donated to students at the up-country.

6.2 Working Environment

In the 2017 sum up of CR activities it appeared that working accidents were prevalent in the mechanics session. In order to prevent and reduce the number of working accidents from 2018 all near misses are mapped, and in GPV Asia monthly management safety meetings and safety audit by the management team has been effectuated, and during 2019 more sites have implemented procedures for working with near misses. In 2019 we have seen the effect of these actions in the decline of the LTI rate.

6.3 Human Rights

In 2019 we have continued focusing on responsible Customer Relation Management. A new version of the Supplier Audit Check List has been implemented and leads to an improved focus on social and labor conditions.

6.4 Corruption, Anti Bribery and Business Ethics

To further anchor the understanding of GPVs business ethics with regards to Anti bribery an e-learning session has been enrolled. The target group towards this training has in 2019 been expanded to include all white-collar employees.

6.5 Environmental Issues

GPV has no material outstanding environmental issues. In 2016 a main objective of environmental improvements was to reduce energy consumption by 10% relative to revenue from 2016 to 2020. We are satisfied that this target has been reached already by 2018 and continued to improve in 2019. Still we continue focusing on energy saving. GPV Thailand, GPV Americas and other sites has run energy saving campaigns as well as increased the focus on reducing paper consumption.

6.6 Gender Composition

The actual gender composition among the Management shows a distribution of 55% female / 45% male (26% female / 74% male in 2018). Among all employees the gender composition shows a distribution of 62% female / 38% male (55% female / 45% male in 2018). The significant change in gender composition is partly related to the acquisition of CCS in 2019.

6.7 GPV CR Index

INDEX	2016	2017	2018	2019	2020 Target
Employees					
Injuries (Injuri Serverity Rate)	100	133	77	39	50
Environment					
Electricity kWh	100	87	84	64	90
Water m3	100	104	95	79	

Bo Lybæk
CEO

Henrik Tornbjerg
CFO