

# ESG POLICY

NORDIC  
UNMANNED

## Innhold

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## Purpose and responsibility

The purpose of this document is to describe Nordic Unmanned’s approach to a sustainable business and ESG (environmental, social, and governance factors). It provides information about how we view ESG in Nordic Unmanned and how we manage sustainability topics. It must be seen in conjunction with other governing documents and policies, available at our online sustainability library.

The CEO, together with the executive team, is the owner of and responsible for our overarching ESG approach management, setting the tone from the top, ensuring that ESG is embedded across our systems and functions, and ensuring that the work is in line with stakeholders’ expectations.

## Introduction to our company and how it relates to ESG

Nordic Unmanned is a global leader of high-end products and services related to drones and data capture. Through worldwide operational experience and industry-leading expertise, Nordic Unmanned supports large governmental and industrial clients in the adaption of unmanned systems and services within four verticals: maritime, security, infrastructure, and logistics.

Nordic Unmanned has grown rapidly since it was founded in 2014. As of Q3 2022, the company is listed on Euronext Oslo Børs. Nordic Unmanned ASA consists of Nordic Unmanned with subsidiaries forming The Nordic Unmanned Group (the “Group” or “we”). The Group is headquartered in Sandnes, Norway, and has offices in Oslo (NOR), Molde (NOR), Odense (DK), Cranfield (UK), Arnsberg (GER) and Hasselt (BE), and has quickly become one of Europe’s leading providers of unmanned systems and services, with operations across the continent.

### Subsidiaries:

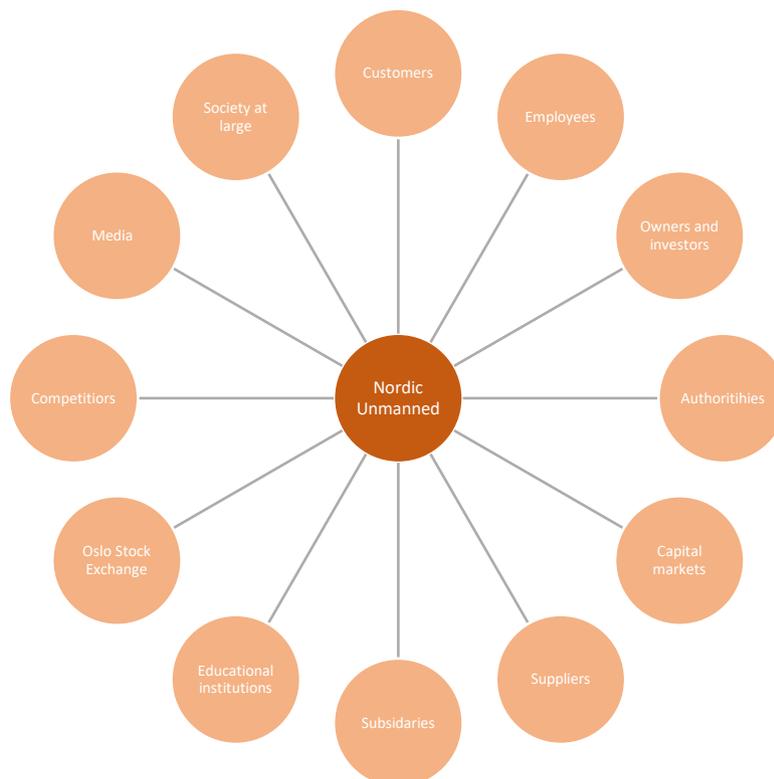
- Founded in 2005, AirRobot® GmbH & Co. KG (“AirRobot”) is a true pioneer in the European drone industry. The company is a long-standing supplier for the Bundeswehr of both drone systems and Maintenance, Repair and Overhaul (MRO) services.
- Founded in 2003, Ecoxy AS (“Ecoxy”) has particularly focused on NOx measurements, following the introduction of NOx taxes. Ecoxy has so far completed almost 1,200 measurement assignments, and has long-standing relations with environmental authorities in Norway, Sweden, Denmark, including Norwegian NOx Fund as well as shipping companies, engine builders and suppliers of emission reduction services.
- The mission of NUAer AS (“NUAer”) is to support the acceleration of the green transition in the maritime industry through world-leadership control of marine air pollution. NUAer is the result of the joint venture between the Finnish company Aeromon, one of the global leaders in development of emission monitoring technology. The joint venture company will strengthen Nordic Unmanned’s emission monitoring service offering within the maritime and oil and gas industry globally.
- Nordic Unmanned UK Ltd. provides Nordic Unmanned with a local base to serve its UK customers and the opportunity to work with other innovative small and medium sized enterprises that are developing new technologies to support the projected high growth of the unmanned aviation sector. The company is strategically located at Cranfield University, known for its aeronautical focus.
- Nordic Unmanned DK ApS provides access to important facilities for testing and training of pilots and gives us closer reach to mainland Europe and the customers of the company. The office in Odense, Denmark, provides access to a resourceful cluster.
- DroneMatrix is a leading hi-tech company building and implementing the next generation of aerial robotic technology. These automated intelligent drone solutions are safe, reliable and flexible to implement in any kind of industrial environment. DroneMatrix is the founding father of unmanned drone technology in Belgium and is responsible for the development of

the commercial air layer operated by aerial robotics (6th NeTWorK). DroneMatrix is committed to making its mark in a growing global unmanned market through important references and solid partnerships. Nordic Unmanned currently holds a 55% share in DroneMatrix and has a right and obligation to acquire 100% by 2025.

With rapid growth, the complexity of our organization increases. In Nordic Unmanned, we are committed to focusing on ESG alongside continued growth in order to ensure we manage ESG-related risks along all three dimensions of sustainability while also identifying and capturing the opportunities of the green transition. With the increasing demand for ESG-information to meet the expectations of our various stakeholders, we will work structurally with sustainability. As part of this, we will explore implementation of the GRI (Global Reporting Initiative) framework as a key tool for disclosing consistent and measurable information about material ESG risks and opportunities to the economy, the environment, and people in the context of our business – and as a tool to support our constant efforts toward continuous improvement.

**Nordic Unmanned stakeholders**

Nordic Unmanned stakeholders include, but are not limited, to employees (in the parent company, subsidiaries, elected representatives), customers (corporate customers and governmental customers), owners and investors (employees and other shareholders), suppliers, authorities (relevant municipalities and county authorities in the Group’s market area, European governments) competitors, educational institutions (Universities and Colleges: University of Stavanger, NTNU), society, media, public opinion, public actors, local communities, digital channels, social media (Facebook, Instagram, Snapchat and LinkedIn), newspapers, society at large, ESG rankers, rating agencies and analysts (Sustainalytics, MSCI, Moody’s, ISS), Oslo Stock Exchange: EuroNext.



The core of Nordic Unmanned’s business idea is to provide more effective solutions, at a lower cost, that are safer for humans and have lower emissions. We firmly believe that our solutions make a positive contribution to the economy, environment, and people. Opportunities for exploring new solutions to make business operations and public missions safer, more sustainable, and effective are limitless. We embrace these opportunities with responsibility and awareness of industry challenges.

The Group<sup>1</sup> is ISO 9001-2015 certified for the operation, maintenance, sale, design, development, and production of unmanned systems and sensor technology. The production is also AS9100 certified.

## Nordic Unmanned’s approach to sustainability and responsible business conduct

Providing safer and green solutions is at the heart of our business idea, and Nordic Unmanned continuously explores opportunities arising in the context of the green transition. We are deeply committed to being a sustainable company. This commitment is at the core of our values. We actively seek to increase positive impact and reduce negative impact on the economy, environment, and people, including the climate and human rights. Together with the industry as a whole, we are working to make our business and the industries we operate in more sustainable.

### CARING

“We care for our employees, customers, and the environment. In Nordic Unmanned, we foster a safe work environment founded on trust in each other. We put the team before ourselves, and we wish others great success. We operate in a safe manner to safeguard people and the environment. We design and deliver products and services with as little negative impact on the environment as possible. We share our knowledge, best practice, and key learnings, to help each other grow.”

Nordic Unmanned Value Statement

At Nordic Unmanned we aim to integrate a systematic ESG approach across our business activities and management systems. As a company listed on Euronext Oslo as of Q3 2022, we operate in a strictly regulated market. Beyond compliance with legal requirements and market regulations, we strive to meet our stakeholders’ expectations regarding sustainability and responsible business conduct in line with international standards.

We comply with relevant national and international laws, rules, regulations and norms in our daily business and external assignments. As part of this commitment, we support global ambitions for a more sustainable world – including the Sustainable Development Goals (the “SDGs”) and the Paris Agreement – and strive to meet key international standards for responsible and sustainable business, including the United Nations Guiding Principles (the “UNGP”) on Business and Human Right, the OECD Guidelines for Multinational Enterprises and International Labour Organization (the “ILO”) core conventions and principles for decent work.

We respect all internationally recognized human rights including the International Bill of Human Rights and the principles concerning fundamental rights set out in the ILO Declaration on Fundamental Principles and Rights at Work.

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<sup>1</sup> Per June 2022, the UK and DK locations are not incorporated in the certificate yet as these are newly started subsidiaries.

## Contribution to the UN Sustainable Development Goals

Nordic Unmanned supports the 17 SDGs and the common global efforts for fighting poverty, protecting our planet, and delivering peace and prosperity for all. We recognize that the greatest contribution that most businesses can have toward supporting the SDGs is to prevent and address negative impacts on the environment and people. Nordic Unmanned has also identified four SDGs where we believe our business is particularly well-placed for contributing toward positive impact:



### SDG 3 – Good Health and Well-being

Subgoal 3.9 – “by 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination”



### SDG 9 - Industry, Innovation and Infrastructure

Well-functioning infrastructure is the foundation for a modern and interconnected society. To develop a resilient and sustainable system for the future, upgrading industry and infrastructure through innovation is a key contribution. Entrepreneurial is one of our core values at Nordic Unmanned, as we always strive to be solution-oriented and do not fear being first movers and innovative. We embrace the risk of being entrepreneurial while mitigating risks through our competence, systems, and processes. Nordic Unmanned is committed to contributing to sustainable innovation for new solutions, more effective, less risk, and embracing the opportunity to rethink and modernize infrastructure. Specifically, Nordic Unmanned contributes to subgoal 9.4, by developing environmentally sound technologies and processes.



### **SDG 13 - Climate Action**

Climate change is humanity's greatest challenge and represents a threat to our entire civilization. We are deeply committed to contributing to SDG 13 by reducing greenhouse gas (GHG) emissions. As drones have a significantly lower carbon footprint compared to manned alternatives, we contribute positively across our business areas - maritime, security, logistics, and infrastructure. Drone solutions can play an even bigger role as the transition to net-zero accelerates further across all sectors.



### **SDG 14 - Life Below Water**

The protection of oceans, waters, and marine resources is essential to a sustainable planet, habitable for humankind. Nordic Unmanned contributes directly toward this goal together with our customers in the context of operations aimed at eliminating overfishing by utilizing drones for surveillance of illegal fishing as well as in the context of monitoring oil spills.

## **A holistic approach to ESG**

Nordic Unmanned sets a high standard for the way we do business. We are committed to safe, responsible, and sustainable business and seek to contribute positively to sustainable development. Nordic Unmanned embraces all three ESG dimensions (environment, social, governance) and a double materiality approach in the context of our business to actively manage risks to the environment and people (and our company) and seize on opportunities.

### *E: Reducing impacts on the environment*

Contributing positively to the environment is at the core of our value of being a company that cares. As stated in our values: "Caring: we operate in a safe manner to safeguard people and the environment. We design and deliver products and services with as little negative impact on the environment as possible".

Through our business activities and together with our customers, Nordic Unmanned is committed to making significant environmental contributions by helping our clients reduce their environmental impact.

### **Unmanned drones contributing to CO<sub>2</sub> reduction**

Using North Sea offshore operations as an example, Nordic Unmanned's Camcopter drones emit 98% less CO<sub>2</sub> per kilometre than a traditional Sikorsky S 92 helicopter. This is an important metric, as CO<sub>2</sub> emissions are high on the agenda for Nordic Unmanned and our clients.

### **GHG-emissions from Nordic Unmanned operations**

Nordic Unmanned is working to minimize its environmental impact through the environmental management system ISO14001:2015. With the focus on reducing environmental impact, we will continue to highlight the importance of creating a sustainable business, and we will continue to communicate this to our stakeholders. We will continue to investigate all possibilities to make our business greener. Furthermore, we have an obligation to communicate our green solutions to the public.

Nordic Unmanned's in-house Staaker line of drones are electrical UAVs, which enable operations that are emission-free. However, even as some drones aim to replace manned aircraft and considerably reduce emissions, some of our drones emit CO<sub>2</sub>. The evolution and innovation of drone technology are making the systems and services more effective and less impactful on the environment. Our R&D

department is exploring how to further develop drones that reduce the impact on the environment. This includes using hydrogen fuel cells in our drones.

### Nordic Unmanned contributing to reduction of air and GHG-emissions

In the Maritime business segment, Nordic Unmanned supports clients in reducing their environmental impact and assists authorities in ensuring compliance with environmental legislation through maritime surveillance.

A major challenge in the context of the maritime sector is the emission of sulphur oxides (“SOx”) and nitrogen oxides (“NOx”) from vessels caused by the combustion of crude oil. SOx and NOx are harmful to human health, causing respiratory symptoms and lung disease. In the atmosphere, SOx can lead to acid rain, which can harm crops, forests, and aquatic species, and contributes to the acidification of the oceans. The “IMO 2020” (International Maritime Organization), a sulphur emissions regulation, aims to limit the amount of sulphur in fuel oil used in ships operating outside designated emission control areas to 0,5% (previous limit 3,50% in fuel oil).

Nordic Unmanned provides drone solutions to the European Maritime Safety Agency (the “EMSA”), and these drones sniff up samples from the smoke of the vessels and run analysis to see if the vessels are using oil that is compliant with the IMO 2020 regulations. The regulations aim to significantly reduce the amount of sulphur oxides being emanated from ships and should have major health and environmental benefits for the world, particularly for populations living close to ports and coasts. In 2021, Nordic Unmanned further strengthened emission monitoring through the acquisition of Ecoxy (NOR). Ecoxy is a leading Norwegian supplier of accredited emission measurements for the ship and oil and gas industries. Additionally, Ecoxy is accredited to verify greenhouse gas reporting under the EU ETS (European Union Emissions Trading System). Emission monitoring as a key part of our company represents tremendous growth opportunities for Nordic Unmanned.

#### Nordic Unmanned through subsidiary Ecoxy contributes to emission monitoring

- Accredited exhaust gas measurement of NOx, CO, UHC, PM, O2 and CO<sub>2</sub>
- Non-accredited measurements of NH<sub>3</sub> (ammonia)
- Verification of greenhouse gas emissions
- Measurement of emissions to air from onshore facilities

**Ecoxy has focused on NOx measurements after the introduction of NOx taxes. Ecoxy has long-standing relationships with environmental authorities in Norway, Sweden, and Denmark, including the Norwegian NOx Fund, as well as shipping companies, engine builders, and other suppliers of emission reduction services. It is the only Norwegian supplier of accredited emission measurements of marine engines.**

### Nordic Unmanned contributing to monitor oil spills in the ocean

Oil spills have negative impacts on the environment and on the economy. Oil spills harm marine and terrestrial ecosystems. Nordic Unmanned contributes to monitoring oil spills in the ocean together with our customers. Nordic Unmanned utilizes lightweight drones to provide aerial support during oil pollution response operations. The aerial footage aids the on-scene coordinators in assessing the spillage and ensure that available oil spill response resources are utilized most efficiently. Cleaning an oil spill is costly, and the environmental effects can last for decades. Thus, Nordic Unmanned aims to limit the spread and impact of an oil spill.

### Nordic Unmanned contributing to protection of marine ecosystems

Overfishing can disturb and harm the ecological balance of marine ecosystems. Systemic overfishing is related to illegal catches and illegal trade. Nordic Unmanned provides governmental customers with valuable data during fishery inspections. Before and during fishery inspections, we provide live video and imagery of fishing vessels subject to inspection. The drone is usually placed in position before the inspection vessel calls the fishing vessel, enabling the inspection vessel to observe how the fishing vessel and crew react when they are warned about the boarding inspection. A powerful payload with 30x optical zoom also enables the fishery inspector to evaluate the fish type and net size visible.

### S: Safeguarding people

Unmanned aerial solutions contribute to making a range of public sector missions and business operations significantly safer for the individuals involved, compared to traditional manned approaches. Several of the operations and drones provided by Nordic Unmanned are also used specifically for the purpose of safeguarding the lives of people, from search and rescue operations to gathering data to keep the public in democratic societies safe and secure. Respect for people is part of our value of being a company that cares and is a key principle in our ethical guidelines. This overarching goal is supported by key Nordic Unmanned policies, covering respectively: human rights; diversity, inclusion, and equality; health and safety; supply chain responsibility; and product and service governance. The policies are embedded in our quality management system.

### Human rights

We strive to implement our corporate responsibility to respect human rights in line with the UNGP and the ILO Declaration on Fundamental Principles and Rights at Work. We undertake human rights due diligence to prevent and address adverse impacts on people in our own workplace and activities as well as in our value chain. We have identified the most salient potential human rights risks related to our activities and value chain and address them through our quality and risk management approach. Key human rights-related issues we focus on to safeguard employees and other potentially affected stakeholders are:

- Health and safety
- Employee security
- A safe and inclusive workplace
- Close collaboration with unions
- Diversity and anti-discrimination in the workplace
- Data security and privacy
- Sustainable supply chain
- Responsible end-use of our products

Our just culture and internal whistleblowing procedure enable employees to raise concerns about HSEQ, security and other workplace conditions without fear of retaliation.

As required by the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), we will publish an account on our human rights due diligence. Our human rights due diligence is carried out in line with the steps set out in the UNGP and the OECD Due Diligence Guidance for Responsible Business Conduct.

### Equality, diversity, and inclusion

We are committed to strengthening diversity across the company, which includes strengthening gender balance at the management level and recruiting employees from different nationalities. We do not accept any form of harassment or discrimination toward employees or others with whom we relate through our business. Our aim is to create a workplace where our employees, regardless of their gender, age, ethnicity, national origin, education, religion, belief, disability, sexual orientation, or gender identity, feel respected and valued. At NU, we value and respect diverse life experiences and are committed to providing equal opportunities in our recruitment process and upon employment with us.

### Responsible supply chain management

Our commitment to prevent and address negative impacts on people and the environment that may arise in the context of our business, includes a full value chain approach, focusing not only on our own activities but also on our supply chain and our business relationships. We expect our suppliers to adhere to the same minimum standards of responsible business conduct. At a minimum, we expect suppliers to comply with all relevant legal and industry requirements and international standards for product safety, climate and environment, human rights, decent work, responsible sourcing of minerals, HSEQ, anti-bribery and business ethics.

Responsible and sustainable supply chains require action and collaboration across tiers. Together with the industry, we are striving to make our business as sustainable as possible. We, therefore, seek to work with suppliers that share these commitments to responsible conduct and to keep searching for more sustainable solutions. We screen suppliers as part of our evaluation process and clearly signal our expectations through our code of conduct for suppliers. If possible, we strive to use local suppliers to reduce unnecessary transportation and to support our local communities.

### Societal engagement and building a responsible drone industry for the future: Contributing to research and education

Nordic Unmanned has supported students and research projects at educational institutions at various levels over several years. Since 2018, we have provided educational assistance to high-school internships (where pupils will stay at our workplace for a week), Bachelor students (BSc), Master students (MSc), and Ph.D. candidates with research in the area of unmanned technology. The University of Stavanger has established a drone lab at the campus with support from Nordic Unmanned. Nordic Unmanned also collaborates with Ascend, a drone team from NTNU. We support them financially and provide advice on technology and operations. Since 2021, Nordic Unmanned has participated twice a year with case studies for secondary and primary school students as part of the Ungt Entreprenørskap Rogaland initiative ("Young Entrepreneurship", a non-profit collaboration between the Norwegian education system and business). Nordic Unmanned is part of the jury that selects winners in Ungt Entreprenørskap (both our own case studies and for the price "youth business of the year"). By supporting educational research projects, Nordic Unmanned can guide the future of the industry and create a sustainable industry for the years to come. Sharing substantially contributes to developing relevant knowledge and skills for employment, contributing to future-fit competence in our local community related to engineering and science.

## Responsible end-use

Several technological innovations that bring benefits to individuals, businesses and societies also have the potential to be used in harmful ways. A key issue for drones, as with other products and services with such “dual-use” potential, concerns the need to ensure responsible end-use. Drones produced or sold by Nordic Unmanned are non-lethal. At Nordic Unmanned, we are aware of the challenge that drones used for civilian purposes or lawful, legitimate security sector purposes, may have other applications after the point of sale. We work systematically to identify and manage risk associated with ethical dilemmas in our daily work and business partnerships. Above all, we comply with legal requirements and meet international standards.

Dual-use products are subject to strict export and import control regulations. These include the Norwegian export control system, EU regulations, and the US Government’s International Traffic in Arms Regulations (ITAR). Complying with the Norwegian, as well as international, export regulations is an integrated part of our value chain human rights due diligence. Necessary routines and follow-ups to ensure compliance are integrated into our sale’s due diligence process. Sales to defence and security sector customers are subject to the Norwegian export control system, which requires that defence-related products, technology, and services are only exported from Norway in accordance with Norwegian security and defence policy, and that exports of dual-use items do not contribute to the proliferation of weapons of mass destruction (nuclear, chemical and biological weapons) or their means of delivery. Moreover, the Norwegian and EU regulations also prohibit exports if, among other things, there is a clear risk that the exported item might: be used for internal repression (based on UN, EU or Council of Europe assessments of the country’s records of respecting international human rights and international humanitarian law); be used to commit war crimes; be used aggressively in conflict zones; be used for acts of terrorism; or be diverted to an undesirable end-user or for an undesirable end use. As part of the export licensing process that Nordic Unmanned is subject to, customers are required to provide an end-user statement limiting the use of the items to defence purposes only in accordance with governmental regulations and prohibiting re-export without the written consent of competent Norwegian authorities.

All our military and other customers in the security business area are within the EU and NATO or recognized by EU and NATO country authorities, who are subject to international obligations of international humanitarian law and international standards for human rights and the rule of law and are subject to EU dual-use export controls.

## G: Ethical corporate governance and effective ESG risk management

The business opportunities of the drone industry are numerous and exciting. They also come with responsibility. At Nordic Unmanned, we believe that how we conduct our business matters. Recognizing that “culture eats strategy for breakfast”, we not only seek to be entrepreneurial and daring to seize on strategic opportunities, but also pay careful attention to building a culture of integrity, ethics, and compliance. We strive to be a reliable and trusted partner and conduct our business safely and ethically, which is fundamental both to sustainability and our long-term success.

We are committed to complying with all applicable laws, regulations, and standards, and always conducting our business ethically. We place great emphasis on corporate governance and consider good corporate governance to be a prerequisite for value creation and trustworthiness, and for access to capital. To secure strong and sustainable corporate governance, it is important that Nordic Unmanned ensures good and healthy business practices, reliable financial reporting, and an environment of compliance with legislation and regulations across the Group. As a Norwegian public limited company listed on the Oslo Stock Exchange (Oslo Børs) as of Q3 2022, Nordic Unmanned must

comply with the Norwegian Securities Trading Act, the continuing obligations for companies listed on Oslo Børs, the Norwegian Public Limited Liability Companies Act, and all other applicable laws and regulations. Nordic Unmanned endorses the Norwegian Code of Practice for Corporate Governance (“Norsk anbefaling for eierstyring og selskapsledelse”), issued by the Norwegian Corporate Governance Board.

### Overview: Our ethical principles and ESG-related policies and governance

We consider our ESG management to be an integrated part of our corporate governance and overall company risk management, strategy, and culture. Our ESG management is led by the CEO and overseen by the board. It is governed by dedicated policies closely connected to key areas of risk and opportunity. While the executive management and the board have the main responsibility for our ESG management, all employees are required to follow our code of ethical conduct. Our just culture approach also contributes toward balancing the need for an open and honest reporting environment with the end of a quality learning environment and culture.

<i>Our ethical principles</i>	<i>ESG-related steering documents – embedded in our management system and supplemented by various other policies, procedures, and manuals</i>
We ensure safety in all our operations, products, and services	<ul style="list-style-type: none"> <li>- Safety statement</li> <li>- Health and safety policy</li> <li>- Quality policy</li> <li>- Product and service governance policy</li> <li>- Security policy</li> </ul>
We treat people with respect and dignity and do not accept any form of discrimination	<ul style="list-style-type: none"> <li>- Human rights policy</li> <li>- Policy for equality, inclusion and diversity</li> <li>- Personnel data and privacy policy</li> </ul>
We strive to be a sustainable company and minimise harm to the environment and climate	<ul style="list-style-type: none"> <li>- Environment policy (ISO 14001 certification and revised policy in process)</li> </ul>
We do not tolerate bribery and corruption	<ul style="list-style-type: none"> <li>- Anti-bribery and anti-corruption policy</li> </ul>
We are a reliable business partner with high integrity	<ul style="list-style-type: none"> <li>- Code of ethical conduct for employees</li> </ul>
We work with our business partners and other stakeholders to promote a sustainable value chain	<ul style="list-style-type: none"> <li>- Code of conduct for suppliers</li> <li>- Product and service governance policy</li> </ul>

### Transparency and continuous improvement

We are committed to openness and transparency and are exploring a strengthened approach to ESG/sustainability reporting, in line with regulatory and market expectations.

We strive toward continuous improvement across everything we do, including with regard to improving and expanding on green solutions and strengthening our strategic and integrated approach to ESG.

### Reference to relevant policies

Nordic Unmanned’s governing documents and policies are available in our ESG portal: <https://nordicunmanned.com/investor-relations/esg-in-nordic-unmanned/>