

Sustainability report

Excerpt from Annual Report 2024

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General disclosures

ESRS 2 – Basis for preparation

BP-1

General basis for preparation of the sustainability report

SP Group's sustainability report for the 12 months ended 31 December 2024 was prepared in accordance with the requirements of the EU Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

The sustainability report was prepared by consolidating all SP Group companies and covers the full range of activities, resources and relations related to our business model and the external environment in which we operate.

The consolidation applied in this sustainability report is the same as that applied in the consolidated financial statements. Accordingly, all companies included in the consolidated financial statements are also included in the sustainability report. In this way, we ensure consistency between our financial and non-financial reporting.

Scope of materiality assessment

SP Group's materiality assessment covers impacts, risks and opportunities (IRO) throughout our value chain, from the upstream to the downstream value chain, as well as our own production.

Upstream value chain: We have assessed the impacts on the environment of the distribution and transportation of raw materials received from suppliers in the upstream value chain. This information is covered by the sections 'E1-5 Energy consumption and mix', 'E1-6 GHG emissions' and 'E5-4 Resource inflow'.

Downstream value chain: We have assessed the impacts of recycling and disposal of waste as well as the distribution and transportation of products, but we do not have any information on how customers handle products after use. Information about our environmental impact is found in 'E1-5

Energy consumption and mix', 'E1-6 Gross GHG emissions' and 'E5-5 Resource outflow'.

We report according to sections 99a and 107d of the Danish Financial Statements Act. No SP Group company is exempt from individual or consolidated sustainability reporting under section 99a(7) of the Danish Financial Statements Act.

We have not excluded information related to intellectual property rights, know-how or results of innovation.

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BP-2

Disclosures in relation to specific circumstances

We use short-, medium- and long-term time horizons in our sustainability reporting. Time horizons are defined in accordance with the ESRS: short-term horizon: 1 year, medium-term horizon: 2-5 years and long-term horizon: 5+ years.

Estimation and outcome uncertainty

We endeavour to disclose data as accurately and directly as possible based on primary data and direct consumption readings, and we do not use sector average data or other proxies to estimate upstream and downstream value chain data. The following areas have been identified as sources of measurement uncertainty in the reporting:

- Scope 3 emissions are reported on the basis of ESRS and the Greenhouse Gas Protocol (the GHG Protocol) methodologies.
- For Category 4 upstream and downstream transportation, we primarily use supplier data and the distance-based method. The distance-based

method involves estimating distances travelled and means of transportation used, which are then documented in a reporting template that has been prepared to support subsidiary reporting.

This sustainability report does not disclose monetary amounts that are subject to a high level of measurement uncertainty.

Changes in presentation of sustainability information

For this reporting year, we have applied a new reporting structure that is directly linked to the individual ESRS reporting requirements.

Historical reporting data are omitted if they are not significant in the context of the new reporting requirements, not comparable with new parameters or not relevant to our business activities. Historical data from 2023 are not covered by PwC's limited assurance report.

Reporting errors in prior periods

Compared with last year's reporting, errors have been identified in the calculation of total OpEx. The total amount of Taxonomy-eligible and non-Taxonomy-eligible activities reported was DKK 55 million too high.

Incorporation by reference

We have incorporated the following references to the sections in the annual report on 'Corporate governance', 'Management systems' and 'Financial statements':

- **GOV-1, 22a, 23:** Information on the identity and sustainability expertise of SP Group's Board of Directors, page 35.
- **GOV-1, 22a:** Information on the identity of SP Group's Executive Board, page 36.
- **GOV-1, 22a:** Information on the identity of other executives and senior managers, page 37.
- **GOV-2, 26b:** Information on SP Group's annual wheel, page 34.

Transitional provisions

We applied the transitional provisions set out in ESRS 1, Appendix C, to ensure a gradual implementation of the new requirements for sustainability reporting. These include:

- **SBM-3, paragraph 48e:** Anticipated financial effects from material impacts, risks and opportunities.
- **E1-9:** Anticipated financial effects from material physical and transition risks and potential climate-related opportunities.
- **E5-6:** Anticipated financial effects from resource use and circular economy-related risks and opportunities.
- **S1-7:** Characteristics of non-employee workers in the undertaking's own workforce.
- **S1-8:** Collective bargaining coverage and social dialogue (for non-EEA member states).
- **S1-13:** Training and skills development metrics.

ESRS 2 – Governance

GOV-1

Role of Management

Composition and competencies

SP Group has a two-tier management structure:

- The Board of Directors is responsible for monitoring and control
- The Executive Board is responsible for the day-to-day management of the Group

Board of Directors

The Board of Directors is made up of three male and two female board members. Accordingly, the female members represent 40% of the full Board of Directors, and the gender diversity ratio is 66.67%.

The Board of Directors has three independent members out of a total of five members, representing 60% of the full Board of Directors.

No employees or other workers are represented on SP Group's Board of Directors.

The skills and qualifications of the members of the Board of Directors are described in 'Corporate Governance' on page 35, in which it is described that one board member has special competencies within HR and ESG.

Executive Board

The Executive Board has one female member out of a total of three members.

The educational backgrounds and competencies of the Executive Board span a wide range of areas covering management, finance, production, supplier management and plastics. Two members of the Executive Board have in-depth knowledge of ESG factors and have taken active part in SP Group's double materiality assessment (DMA) process.

Other executives and senior managers

Nine of SP Group's other 34 executives and senior managers are women.

Our executives and senior managers are typically of local origin and possess the ESG capabilities required to address any material impacts, risks and opportunities (see 'SBM-3') and thus actively contribute to the optimisation of sustainability efforts in operations and driving the strategic focus areas.

The Governance section provides more information about SP Group's Executive Board on page 36 →

and about other executives and senior managers on page 37 →

Reporting principles

Gender diversity on the Board of Directors

The number of board members is reported according to the gender categories women and men (headcount (HC)) at the end of the year.

Female board members as a percentage of all members

Calculated as:

$$= \left(\frac{\text{Number of female board members}}{\text{Total number of board members}} \right) \times 100$$

Gender diversity ratio on the Board of Directors

Calculated as:

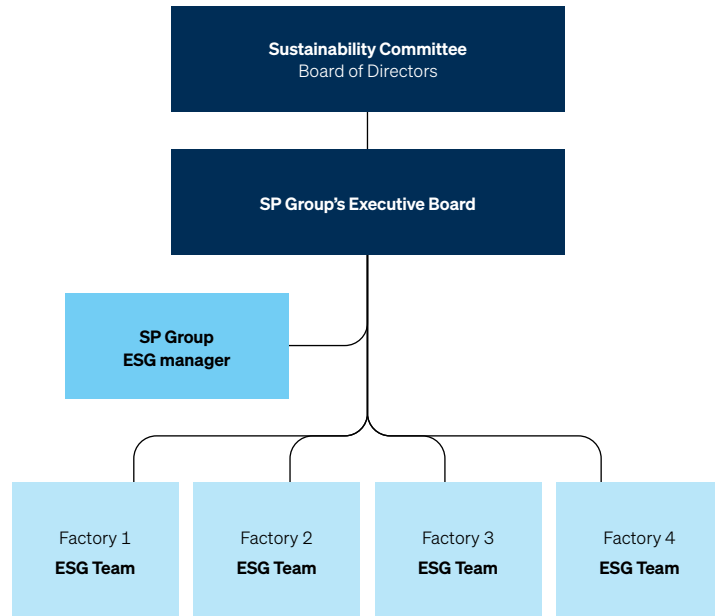
$$= \left(\frac{\text{Number of female board members}}{\text{Number of male board members}} \right) \times 100$$

No other diversity parameters than gender are assessed.

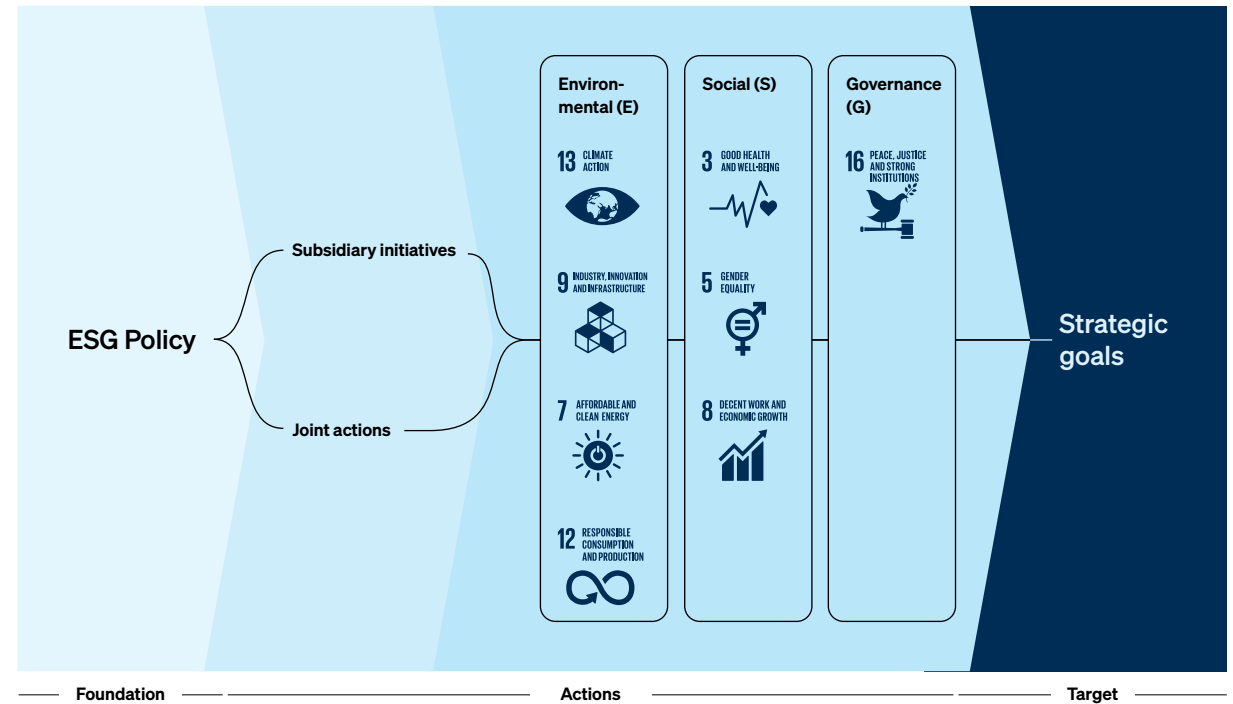
Roles and responsibilities

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

SP Group's ESG organisation



SP Group's Sustainability Strategy



Roles and responsibilities of the Board of Directors

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

The duties of the Board of Directors are established and formalised in SP Group's report on corporate governance, which is updated annually and available on our website. The report describes, among other things, the Board of Director's overall responsibility for the ESG work, including monitoring of the overall strategy and approval of relevant policies and reporting.

The Board of Directors is updated about the efforts to manage impacts, risks and opportunities at board meetings and provides support and guidance to the Executive Board. Any amendments to policies, goals and action plans are reported to and approved by the Board of Directors. Our annual sustainability reporting is also approved by the Board of Directors.

Roles and responsibilities of the Executive Board

The Executive Board continuously oversees the implementation of the ESG strategy, ensures the integration of sustainability into business processes and assesses risks and opportunities at group level. The Executive Board works closely with the Group's ESG manager, who is responsible for planning and coordinating sustainability actions across the Group and for updating the double materiality assessment (DMA). The Executive Board is responsible for reporting to the Board of Directors on the status of ESG data.

Operational responsibility

The managements of the subsidiaries are responsible for the day-to-day implementation of the ESG initiatives, which are rolled out systematically through our management systems and include ongoing dialogue and collaboration with environmental and health and safety organisations. Management is responsible for quarterly data collection and reporting to the Group's ESG manager on progress, results and potential challenges.



SP Group's Executive Board,
(from the left) Søren Ulstrup,
Lars Bering and Tilde Kejlhof

GOV-2

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The key risks and the management of the risks form an integral part of SP Group's annual strategy plans for the Group and its business areas. ESG is a recurring item on the agenda of the quarterly board meetings held in the subsidiaries, and SP Group's Board of Directors is regularly updated about sustainability-related topics.

We include assessments and decisions relating to sustainability impacts, risks and opportunities as described in our annual wheel on page 34. Our sustainability strategy and the DMA are updated in the third quarter of every year. Discussions and necessary changes are included together with results, actions and achievement of goals.

During the reporting period, the Board of Directors, the Executive Board and the subsidiaries and their managements discussed and/or addressed the following material topics:

Energy and environment	Circular economy	Own workforce	Supply chain	Business conduct
<ul style="list-style-type: none"> Establishment of a solar park on the Juelsminde Peninsula Investments in new, more energy efficient production machinery Opportunities for electrification and use of biogas Mandatory energy audits in Denmark and possible improvements Environmental certifications 	<ul style="list-style-type: none"> Use of regenerated materials in own products and in customer-specific solutions Possibility of establishing 'take back' programmes Reporting of waste streams and reporting quality 	<ul style="list-style-type: none"> Health and safety in relation to accidents, safety improvements and absence due to illness Health and safety certifications Satisfaction surveys IT and personal data security 	<ul style="list-style-type: none"> Possible solutions for managing and monitoring ESG risks Supplier agreements focusing on maintaining the quality and efficiency of collaboration 	<ul style="list-style-type: none"> Strategy and strategy process Anti-corruption awareness and training in the organisation ESG Policy and its scope

GOV-3

Integration of sustainability-related performance in incentive schemes

SP Group has established an incentive programme that integrates sustainability targets for the Executive Board. Sustainability targets make up 10% of the short-term component of variable remuneration which is based on the Group's ability to reduce Scope 1 and 2 emissions. This is part of our long-term goal of being carbon neutral by 2030. The incentive programme is approved and updated by the Board of Directors of SP Group. No incentive programme has been established for the Board of Directors.

GOV-4

Statement on due diligence

In line with the growing focus on companies' impact on society and the environment, we recognise the importance of establishing and maintaining a sustainable business model at SP Group. For this purpose, we have established a due diligence process that supports our efforts to identify, prevent and mitigate the potential negative impacts our business operations may have on climate, the environment and people, while at the same time providing transparency on these efforts.

Our due diligence process covers the entire value chain (see Figure 2, SBM-1), and we are committed to maintaining sustainability standards across all our companies, suppliers and business partners. The performance of risk assessments and the work with risk management are based on a systematic approach to assessing and prioritising risks. The Executive Board regularly reviews the business activities to identify and assess sustainability risks. This assessment covers environmental impacts, social matters and economic factors. In addition, we collaborate with external experts, stakeholders and advisers to gain an understanding of sustainability impacts, risks and opportunities associated with our business activities.

Main features of due diligence process	Sections in the sustainability report
Embedding due diligence in governance, strategy and business model	<ul style="list-style-type: none"> Statement on due diligence (GOV-4), page 51
Engagement with affected stakeholders in the due diligence process	<ul style="list-style-type: none"> Interests and views of stakeholders (SBM-2), page 56
Identifying and assessing negative impacts	<ul style="list-style-type: none"> Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3), page 58 Result of identification phase, page 66 Climate change (E1), page 71 Energy consumption and mix (E1-5), page 77 Gross GHG emissions (E1-6), page 79 Resource use and circular economy (E5), page 83 Workers in the value chain (S2), page 109
Taking actions to address those impacts	<ul style="list-style-type: none"> Targets related to climate change mitigation and adaptation (E1-4), page 76 Targets related to resource use and circular economy (E5-3), page 86 Targets related to own workforce (S1-5), page 99 Targets related to value chain workers (S2-5), page 110 Prevention and detection of corruption and bribery (G1-3), page 113
Tracking the effectiveness of these efforts and communicating	<ul style="list-style-type: none"> Targets related to climate change mitigation and adaptation (E1-4), page 76 Targets related to resource use and circular economy (E5-3), page 86 Targets related to own workforce (S1-5), page 99 Targets related to value chain workers (S2-5), page 110 Prevention and detection of corruption and bribery (G1-3), page 113

GOV-5

Risk management and internal sustainability reporting controls

SP Group applies a three-step risk assessment model based on the OECD guidelines for responsible business conduct to systematically identify, assess and prioritise risks.

Sustainability-related risks are mapped and classified according to their nature and potential impact. Risks are assessed on the basis of probability and impact against existing controls.

Then a score is given, on the basis of which priorities and actions are decided.

We have identified the following material risk areas in the context of sustainability reporting as well as a number of corrective actions which have been implemented to mitigate these risks.

Identified risks are handled locally by in-house functions and processes in the subsidiaries in consultation with our ESG manager.

The results of identified risks in the subsidiaries are reported annually to the Board of Directors and the Executive Board and, in concrete cases involving serious risks, on an ad hoc basis.

Risk areas	Corrective actions
Reporting tool	A digital software solution and a reporting portal to ensure efficient and reliable data collection.
Completeness of data	All subsidiaries report on all datapoints.
Reporting skills	Preparation of internal reporting guide, followed up by information sessions aimed at relevant employees. All employees who will be involved in reporting must be introduced to the reporting portal and the guide.
Internal controls	A two-step internal control process: <ul style="list-style-type: none"> • Step 1 is performed quarterly by a controller responsible for a number of companies. • Step 2 is carried out quarterly by the SP Group Management.
Management awareness	ESG has been introduced as a recurring agenda item at the companies' quarterly board meetings.
Double materiality assessment (DMA)	Updating of the DMA is a recurring constituent of our annual wheel and is performed at least once a year.
Compliance with legislation	Full reporting on Scope 3 is part of our action plan for sustainability activities. The action plan is regularly updated.

ESRS 2 – Strategy

SBM-1

Strategy, business model and value chain

Sustainability strategy

At SP Group, we are conscious of our joint responsibility to contribute to a more sustainable world and aim to do so through our day-to-day actions. Liaising with customers and other stakeholders, we aim to develop and manufacture products that promote quality of life and ensure a more efficient use of resources – for the benefit of the environment, climate, people and animals.

Our subsidiaries must be managed with a focus on innovation of operations and manufacturing processes to optimise resource consumption and promote sustainable practices. This will contribute to a positive development both globally and locally and support the health and safety of our employees. To this end, we have a strategy for our subsidiaries to be ISO certified in the areas of quality, environment and health and safety. Our certification status is described in 'Management systems' on page 43.

We support the initiative behind the 17 UN Sustainable Development Goals, to which our actions

contribute directly or indirectly. To underline our commitment to global sustainability, we have been a member of the UN Global Compact for 12 years now, its principles being the foundation for our sustainability activities.

Business model

SP Group develops and manufactures moulded plastic and composite components that include both own-brand products and customer-specific solutions.

Manufacturing processes are based on carefully selected raw materials combined with advanced technologies in a wide range of manufacturing processes, including injection moulding, reaction injection moulding, vacuum forming, blow moulding, rotational moulding, extrusion and 3D printing.

Our products have a wide range of applications in industries such as Healthcare, Cleantech and Foodtech, which have high demands for quality and precision. In recent years, we have strength-

ened our efforts to integrate sustainability into our business model. In particular, we have focused on value creation through recycling of plastics in our production and utilising own surplus materials from production as well as regenerated materials and raw materials from other players in the plastics industry.

Value chain

Our value chain is illustrated in Figure 2 and includes upstream, own processes and downstream.

Our subsidiaries collaborate and engage with stakeholders in the upstream value chain on know-how and development in relation to securing raw materials, products and services, to the benefit of our customers and investors.

Number of employees by geography

At 31 December 2024, we had a total of 2,339 employees in 13 countries and a total of 31 factories in Europe, Asia and the USA. The geographical distribution of employees is illustrated in Figure 1.

Figure 1
Number of employees at 31.12.2024

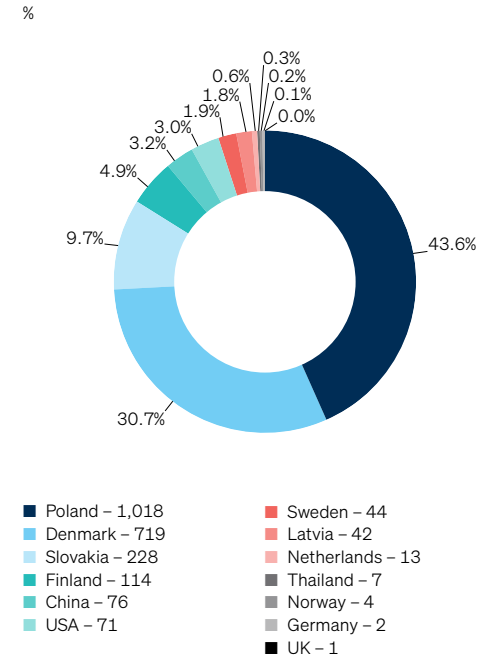
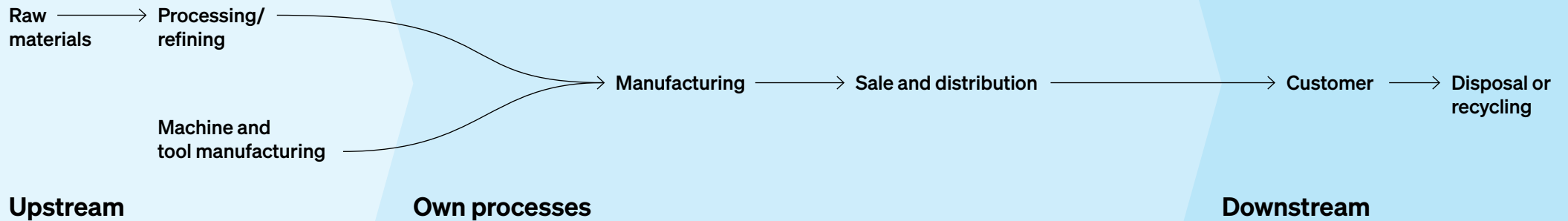


Figure 2

SP Group's value chain



Our upstream value chain includes:

- **Extraction:** Crude oil and gas are transported to refineries.
- **Manufacture of plastics in primary form:** Refined raw materials are transported on to manufacturers that manufacture plastics in primary form, such as powders, granules and resins. Some of our companies source plastics in primary form from which plastic and composite products are manufactured.
- **Manufacture of semi-manufactured products:** In other cases, plastics in primary form undergo further processing into semi-manufactured products in the form of sheets, rods and tubing before being used by our companies.
- **Transportation:** Plastics in primary form and as semi-manufactured products are delivered to our companies by lorry in approximately 90% of cases.
- **Production machinery, equipment and tools:** As a necessary resource, we receive new machinery, robots and tools from the upstream value chain for the manufacture of plastic and composite components.

Our processes ensure that our own-brand products and customer-specific components are manufactured efficiently with due regard for the environment and employee safety while at the same time meeting customer requirements and expectations. The processes include:

- **Tool design and construction:** The process begins with the design and construction of tools necessary for manufacturing. This involves a choice of materials and technologies that ensure high quality and efficiency.
- **Choice of manufacturing equipment for specific orders:** Production equipment is selected based on the specific requirements of each order. This includes machinery, robots and other equipment necessary for meeting the customer's needs.
- **Production of plastic and composite solutions:** In this phase, plastic and composite solutions are manufactured using energy in the form of electricity or gas. Employees, production equipment and robots work together to ensure efficient and high-precision manufacturing.
- **IT and other infrastructure:** IT systems and other infrastructure support the entire manufacturing process, from design to finishing. This includes software for design, production planning and control and quality control.
- **Finishing:** After production, some items undergo various finishing processes such as printing, surface coating, welding, laser engraving, assembly and packing. These processes ensure that the products meet the required specifications and are ready for delivery.
- **Handling of materials for recycling and waste:** During and after production, materials for recycling and waste are handled in an environmentally friendly way. This includes sorting, reuse and proper waste disposal.
- **Installation at customer locations:** In some cases, manufactured plastic products are installed at customer sites. This applies primarily to Ergomat.

Our downstream value chain includes:

- **Distribution:** Sold products are transported to customers.
- **Use:** Some products are used directly by customers, while others are integrated in larger structures before being put into use.
- **Disposal:** After use, products made of thermoplastics can undergo further waste sorting and be sent for recycling. A small part of these products is returned to SP Group. Some products can only be used once, especially products used in the healthcare sector. These products are disposed of as waste.

Strategic sustainability goals and market position

Since 2018, we have aimed to contribute to the UN Sustainable Development Goals (SDGs) through our products and operations, but also through concrete projects that make a difference for people and the environment, both locally and globally. Our strategic actions supplement the parameters that were assessed to be material in 2024.

Strategic actions



Health and wellbeing

We manufacture a range of products for the Healthcare industry, including Ergomat's ergonomic matting, SP Medical's guide wires, MedicoPack's packaging for pharmaceuticals and SP Meditec's plastic components for medical device equipment. These products help prevent and cure diseases while increasing the quality of healthcare services to which everyone should have access. Healthcare products represent 41% of our total revenue.

We contribute to good health and wellbeing by securing and creating workplaces with a healthy dialogue, opportunities for personal development and a constant focus on safety, e.g. through the safe use and disposal of chemicals from our production.

We care that our subsidiaries are geographically located where people have the opportunity to thrive physically and mentally and have the opportunity to receive education and improve their standard of living.



Industry, innovation and infrastructure

Through the products we manufacture for the Cleantech industry, we have the opportunity to contribute to reduced energy consumption, production of renewable energy and efficient treatment of waste water. This represents 29% of our total revenue.

By using better equipment and machinery, we reduce raw materials waste, which in turn reduces our impact on the environment and climate. To this end, we require that investments are made in equipment and machinery with increased energy efficiency and less waste of raw materials.

SP Group is dependent on transportation of our products and on electricity, the internet and uninterrupted access to raw materials. We are keen to enter into partnerships that support the development of processes that can contribute to positive change and sustainable development.



Responsible consumption and production

We strive to reduce the Group's waste volumes through preventive measures, by sorting into waste fractions and recycling surplus material from our production. This is why we and our customers are strongly focused on manufacturing products from regenerated materials.

Our source sorting of waste supports global efforts on recycling and transition to a circular economy. Thermoplastic industrial scrap is thus part of a circular use flow, whereby waste of natural resources is reduced.

This is facilitated by systematic monitoring and reporting on our consumption of raw materials and by continuously seeking to increase our use of regenerated materials from our own production as well as industrial scrap in the manufacturing of new products.

Regenerated materials represented 19% of the total volume of plastic materials purchased in 2024.

Our sustainability strategy and related targets are communicated in our annual sustainability report. The targets cover all our activities and are therefore relevant to both customers and other stakeholders.

SBM-2

Interests and views of stakeholders

We have built our knowledge of our stakeholders through many years of interaction and dialogue. Our engagement with stakeholders is focused on their expectations of our strategy and business model and helps to uncover current and potential negative impacts. Internal and external stakeholders and a description of their primary interests and how we interact with them are shown here:

Stakeholders	Primary interests	How SP Group interacts with stakeholders
Customers	Sustainability, carbon footprint at product level, reduction of carbon emissions, use of renewable energy, sustainable products, recycling of materials, compliance with international standards.	We ensure that our customers' primary interests are in focus through committed efforts to become carbon neutral and use renewable energy. We are increasing the use of regenerated and surplus materials in the development of products. As a member of the UN Global Compact, we are committed to responsible business operations and sustainable development to meet our customers' demands for sustainable and transparent solutions.
Employees	Attractive working conditions, wellbeing and safety, wages and labour rights, education, training and development, sustainability in production, transparency and dialogue.	We maintain attractive working conditions by offering fair wages, professional development, ongoing dialogue and employee surveys. We involve our employees in reducing our environmental impact, and we are transparent about our expectations and results with respect to sustainability actions, ESG policy and environmental and health and safety certifications.
Workers in the value chain	Attractive working conditions, wellbeing and safety, wages and labour rights, education, training and development, sustainability in production, transparency and dialogue.	As part of our day-to-day operations, we engage with our contact persons in the value chain, and our ESG Policy sets the framework for the collaboration.
Suppliers	Trading and sound payment practices, labour rights, collaboration on choice of materials and innovative solutions.	We work closely with our suppliers to increase the use of recyclable raw materials. We are focused on environmental and health and safety certifications, the use of renewable energy and recycled materials. We expect our suppliers to comply with our Supplier Code of Conduct.
Local communities	Environmental impact, creation of local jobs, collaboration with the local community, transparency and communication, social responsibility.	We work to minimise our local environmental impacts, create local jobs and actively engage in local initiatives. We are transparent about our sustainability actions, and we take social responsibility and support local associations.
Educational institutions	Quality in teaching, research and innovation, sustainability, accessibility, inclusion and collaboration with businesses.	We collaborate with educational institutions on relevant education and training in the form of internships and apprenticeships. To support their education and development, we give pupils and students access to our knowledge and know-how through factory visits.

Stakeholders	Primary interests	How SP Group interacts with stakeholders
Investors and banks	Responsible business operations, risk management and financial performance, compliance with ESG standards, carbon neutrality, use of renewable energy, energy recovery, sustainable investments.	We ensure an open dialogue through company announcements via NASDAQ, annual and interim reports, general meetings and ESG reporting. We comply with ESG standards, work towards carbon neutrality, use renewable energy, invest in energy-efficient equipment and develop environment- and working environment-friendly solutions.
Insurance undertakings	Risk assessment and management.	We have risk assessment processes and systems in place focused on quality, environment, health and safety and IT, among other things.
Trade unions	Working conditions and safety, wages and labour rights, education, training and development, sustainability in production, transparency and dialogue.	We ensure healthy and safe working conditions, fair wages, opportunities for education, training and development, and we are transparent about our sustainability efforts.
Interest and trade organisations	Compliance with industry standards, promoting a circular economy, sustainable innovations, transparency and reporting, collaboration and knowledge sharing.	We adhere to industry standards, promote a circular economy, invest in sustainable solutions, report on our sustainability efforts and collaborate with other companies.
NGOs (non-governmental organisations)	Supporting the sustainability agenda, environmental protection, transparency and responsibility, compliance with international standards, promotion of a circular economy and social responsibility.	We reduce our environmental impact, are transparent about sustainability efforts, comply with international standards, contribute to a circular economy and take social responsibility. We have endorsed the UN Global Compact and report annually in accordance with its principles, and we participate actively in relevant webinars.
Authorities	Compliance with legislation and regulations, reducing environmental impacts, using renewable energy, reporting and transparency, promoting a circular economy and social responsibility.	We comply with environmental and sustainability legislation, reduce our environmental impact, use renewable energy, report on our sustainability efforts, contribute to a circular economy and create opportunities for workers at risk of dropping out of the labour market.

” *We comply with environmental and sustainability legislation, reduce our environmental impact, use renewable energy, report on our sustainability efforts, contribute to a circular economy and create opportunities for workers at risk of dropping out of the labour market.*

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

For purposes of this sustainability report, the material impacts, risks and opportunities (IRO) we have identified in our materiality assessment are presented together with the thematic areas E1 Climate change, E5 Resource use and circular economy, S1 Own employees, S2 Workers in the value chain and G1 Business conduct.

SP Group continuously focuses on the origin of identified risks and opportunities and how they can impact our business model and strategy. Concrete initiatives to reduce material negative impacts and risks and exploit opportunities will form part of the planning of our sustainability efforts going forward.

We have not performed a specific analysis of the resilience of our strategy and business model with respect to climate-related physical risks and transition risks. However, in our assessment, both strategy and business model have the necessary resilience.

Operator at Gibo Plast A/S standing on ergonomic matting from Ergomat with lifting equipment at his disposal in the manufacturing process.



IRO Description of impacts, risks and opportunities	Place in value chain			Time horizon		
	Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
E1 – Climate change						
<p>Mitigating climate change Our business model and value chain contribute directly and indirectly to greenhouse gas (GHG) emissions through sourcing of materials, transportation in the value chain, operations and production facilities. The largest carbon emissions stem from the production and transportation of raw materials and machinery upstream and downstream in the value chain (Scope 3 – Indirect emissions). We use sea, road and air freight for transport (Category 4) and source from high climate impact sectors (Categories 1 + 2). Goods are transported across borders and on a global scale.</p>	Currently negative impact	■		▲		
<p>Mitigating climate change Our business model and value chain contribute directly and indirectly to greenhouse gas (GHG) emissions through sourcing of materials, transportation along the value chain, operations and production facilities. Our carbon emissions from Scope 1 (direct emissions) and Scope 2 (indirect emissions) primarily relate to district heating, electricity and gas purchased and used for heating and production activities.</p>	Currently negative impact		■	▲		

IRO Description of impacts, risks and opportunities	Impact	Place in value chain			Time horizon		
		Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
<p>Mitigating climate change Climate change can lead to extreme weather events such as hurricanes, floods and forest fires. These events can disrupt the supply chain by damaging transport infrastructure and production facilities, which in turn may cause delays in the delivery of raw materials, weaken the robustness of the supply chain and impact the availability of energy resources. This risk may potentially have a financial effect on SP Group's cash flows, performance and income statement.</p>	Physical risk	■			▲		
<p>Mitigating climate change Climate change may exacerbate resource scarcity and increase the competition for raw materials. This can lead to higher prices and supply chain instability, making it more challenging for manufacturing businesses to secure the necessary inputs. This risk may potentially have a financial effect on SP Group's cash flows, performance, income statement, balance sheet and access to financing.</p>	Physical risk	■					▲
<p>Climate change mitigation The transition to operations with reduced emission levels may have financial consequences in connection with the implementation and maintenance of mitigating measures. This risk may potentially have a financial effect on SP Group's cash flows, performance, income statement, balance sheet and access to financing.</p>	Transition risk		■		▲		

IRO Description of impacts, risks and opportunities	Place in value chain			Time horizon		
	Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
<p>Energy The energy consumption in manufacturing processes is intensive. The energy consumption primarily relates to electricity and gas for machinery and robots, lighting and heating of facilities. Access to renewable energy sources may vary significantly on a regional scale and over time due to a lack of energy saving/storage options. Energy consumption and energy intensity are therefore considered important factors in the Group's operations. To address the negative impacts of fossil fuels, we have taken mitigating measures to ensure a more sustainable energy mix. This involves a transition to more renewable energy sources by installing solar parks and solar panels on roofs and in front of production facilities.</p>		■		▲		
<p>Energy Energy-saving initiatives within the Group's own activities may contribute to cost reductions. The procurement of new machinery offers a significant opportunity to lower operating costs through lower energy consumption. This opportunity may potentially have a financial effect on SP Group's cash flows, performance, balance sheet and access to financing.</p>	Impact Opportunity	■		▲		

IRO Description of impacts, risks and opportunities	Place in value chain			Time horizon		
	Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
<p>E5 – Resource use and circular economy</p>						
<p>Resource inflow, including resource use We source large quantities of raw materials that include many resources. Among these raw materials are plastics in the form of granules, resins, sheets and powders. Purchased machinery and robots also require resources in the form of metals.</p>		■		▲		
<p>Resource inflow, including resource use Plastic granules, plastic sheets and plastic powders are recycled and/or reused in products. Purchased raw materials are not always new raw materials, but may be derived from both own and other businesses' industrial waste.</p>		■		▲		
<p>Resource outflows related to products We sell a wide range of products, which primarily consist of plastic products. As we are subsuppliers, our plastic products are mainly used as components in customers' end-products. This results in large quantities of packaging (cardboard and plastics). We do not control what happens with the products and packaging after they leave our factories.</p>		■		▲		
<p>Waste We generate waste as a result of our production processes. The largest types of waste include foil, wood, cardboard and plastics.</p>		■		▲		

IRO Description of impacts, risks and opportunities		Place in value chain			Time horizon		
		Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
S1 – Own workforce							
Working conditions: Social dialogue All employees have freedom of association and have the right to express their opinions and participate in or elect representatives to collective bodies.	Currently positive impact		■		▲		
Working conditions: Social dialogue The absence of official processes for engaging in social dialogue may have a significant negative impact on employees' working conditions and employment relationships.	Potentially negative impact		■				▲
Working conditions: Freedom of association, the existence of works councils and the information, consultation and participation rights of workers If employees are unable or not allowed to unionise and discuss their working conditions and employment relationships, it constitutes a breach of local rules and may lead to low employee satisfaction and a poor working environment.	Potentially negative impact		■				▲
Working conditions: Collective bargaining, including rate of workers covered by collective agreements Our ESG Policy states that employees are welcome to join a trade union.	Currently positive impact		■		▲		

IRO Description of impacts, risks and opportunities		Place in value chain			Time horizon		
		Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
Working conditions: Collective bargaining, including the number of workers covered by collective agreements If employees are unable or not allowed to unionise and negotiate collective terms, it will constitute a breach of local labour law rules, which has an adverse effect on the employees' ability to influence their own working conditions.	Potentially negative impact		■				▲
Working conditions: Work-life balance A workplace that focuses on employee involvement, meaningfulness and flexibility contributes positively to job satisfaction and the employees' ability to balance family life and other obligations.	Currently positive impact		■		▲		
Working conditions: Work-life balance Focus on a working life where employees experience influence, meaningfulness and flexibility, which is a strong driver for satisfaction and retention. We believe in continuity and that people should be treated the way you would want to be treated yourself. This opportunity may potentially have a financial effect on SP Group's cash flows and income statement.	Impact Opportunity		■		▲		
Working conditions: Health and safety A lack of focus on managing health and safety risks can lead to injuries or illness, long-term health effects, disability and psychological consequences among employees. These risks are particularly pronounced for skilled and unskilled workers at production sites.	Currently negative impact		■		▲		

IRO Description of impacts, risks and opportunities		Place in value chain			Time horizon		
		Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
Equal treatment and opportunities for all: Gender equality and equal pay for work of equal value A gender pay gap is unreasonable and unfair and has a negative impact on the underpaid gender.	Potentially negative impact		■				▲
Equal treatment and opportunities for all: Training and skills development We have a strategic focus on internal recruitment and career development.	Currently positive impact		■		▲		
Equal treatment and opportunities for all: Training and skills development Focusing on training, internal recruitment and career development may be a financial advantage thanks to the employees' knowledge of our corporate culture, values and operations. It also promotes interdisciplinary collaboration. This opportunity may potentially have a financial effect on SP Group's cash flows, performance and income statement.	Impact Opportunity		■			▲	
Equal treatment and opportunities for all: Employment and inclusion of people with disabilities The culture of flexibility and adaptation to meet the needs of employees is paramount. This is why we actively support efforts to help people outside the labour market return to employment. This creates a highly tolerant and inclusive workplace for the benefit of both existing and potential employees.	Currently positive impact		■		▲		

IRO Description of impacts, risks and opportunities		Place in value chain			Time horizon		
		Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
Equal treatment and opportunities for all: Measures against violence and harassment in the workplace A lack of initiative or commitment to creating a workplace free from harassment and bullying may have a negative impact on employees.	Potentially negative impact		■				▲
Equal treatment and opportunities for all: Diversity Being strongly focused on diversity and inclusion, on allowing employees to be their authentic selves and creating an inclusive culture contributes to promoting a sense of community and positively influencing the agenda and people. We have policies in place that support openness and diversity in the workplace.	Currently positive impact		■		▲		
Other work-related rights: Privacy A lack of procedures and guidelines for dealing with confidential employee data may lead to data privacy breaches, which constitute a violation of human rights.	Potentially negative impact		■				▲

IRO Description of impacts, risks and opportunities	Potentiality of impact	Place in value chain			Time horizon		
		Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
S2 – Workers in the value chain							
Working conditions: Social dialogue If there is no opportunity for social dialogue, it is difficult to change working conditions for the benefit of employees and reduce the negative impact.	Potentially negative impact	■		■			▲
Working conditions: Freedom of association, including the existence of works councils If employees are not allowed or able to unionise, they may be held back in unfavourable working conditions.	Potentially negative impact	■		■			▲
Working conditions: Collective bargaining If there is an obvious risk in the industry that hires are not formally registered, there will also be no collective agreement, keeping employees at a disadvantage.	Potentially negative impact	■		■			▲
Working conditions: Work-life balance If employees do not have a formal contract and are not properly registered, there is a risk that they end up working too many hours, which negatively affects their health and work-life balance.	Potentially negative impact	■		■			▲
Other work-related rights: Child labour If we do not ensure that suppliers comply with our ethical standards, the suppliers may use child labour. This may have a material adverse impact on the working life and conditions of employees in the value chain.	Potentially negative impact	■		■			▲
Other work-related rights: Forced labour If we do not ensure that suppliers comply with our ethical standards, the suppliers may use forced labour. This may have a material adverse impact on the working conditions and quality of life of employees in the value chain.	Potentially negative impact	■		■			▲

IRO Description of impacts, risks and opportunities	Potentiality of impact	Place in value chain			Time horizon		
		Upstream	Own processes	Downstream	Short-term	Medium-term	Long-term
G1 – Business conduct							
Corporate culture Failure to implement a sound corporate culture may have several negative consequences. For example, employees may feel disconnected, unmotivated and unappreciated, which may affect both their mental and physical health. This may lead to increased absenteeism and reduced overall productivity.	Potentially negative impact		■				▲
Corporate culture Failure to establish a positive corporate culture may expose us to significant financial risks. A negative culture may lead to higher employee turnover, which in turn leads to costs of recruiting, onboarding and training new employees. Also, it may harm our reputation, potentially affecting customer confidence and supplier cooperation adversely. This can lead to lost business opportunities and potentially lost earnings.	Potentially negative impact		■				▲

ESRS 2 – Impacts, risks and opportunities (IRO)

IRO-1

Description of the process to identify and assess material impacts, risks and opportunities

In autumn 2023, SP Group performed its first DMA according to the European Sustainability Reporting Standards (ESRS).

To facilitate this process, we engaged an external consultancy team. The DMA is regularly revisited and updated and at least once a year as a recurring part of our annual wheel, most recently in 2024.

Identification of impacts, risks and opportunities

The initial phase encompassed desk research, including an assessment of SASB standards, providing a sector-specific perspective and possible inclusion of entity-specific topics, which were then supplemented by interviews with the SP Group steering committee. The steering committee consisted of two members of the Exec-

utive Board and our ESG manager together with our Group CEO, who participated in the decision-making processes.

The understanding phase focused on mapping the Group's activities, business relations, value chain and affected stakeholders to identify material ESRS standards.

In the identification phase, impacts, risks and opportunities were identified, and ESRS standards and subtopics that did not involve material impacts, risks and opportunities for our business model were excluded from the further process.

Following the initial phase, an additional three phases were carried out:

1.

Understanding phase:

Documentation of business model and value chain.

2.

Identification phase:

Impacts, risks and opportunities (IROs) were identified for the ESG areas Environment, Social and Governance.

3.

Assessment phase:

Scoring of identified impacts, risks and opportunities to identify material impacts, risks and opportunities.

Materiality assessment methodology

During the assessment phase, the materiality methodology defined in the CSRD and the underlying ESRS reporting standards was applied in the assessment, scoring and prioritising of impacts, risks and opportunities on a scale from 1 to 5, with 1 being the lowest score.

Societal materiality was assessed by the scale, scope, irremediability and likelihood of impacts (based on whether an impact is positive/negative and actual/potential) for the ESRS standards on Climate change, Resource use and circular economy, Own workers, Workers in the value chain and Governance.

Financial materiality was assessed according to the financial scope of risk/opportunities and the likelihood of the financial effect.

An impact, risk or opportunity is deemed to be material if it is assessed to be above the threshold.

The thresholds were set to reflect past practice and allow comparisons to be made with previous reporting.

Threshold for societal materiality of impacts

E and G \geq 3

S \geq 2.5

Threshold for financial materiality of risks and opportunities.

\geq 3

Areas of increased risk

We operate in several geographies associated with increased risk. However, all companies are under Danish management, which ensures the application of international standards for safety, quality and environment. Therefore, no special significance is assigned to these areas in relation to the risk of negative impacts.

Stakeholder involvement

No external stakeholders were involved in the initial DMA. The DMA was based solely on organisational knowledge from the day-to-day operations of our companies and the representation of the Executive Board in 100% of the boards of directors.

Handling and monitoring

Handling and subsequent monitoring of impacts, risks and opportunities are described in more detail in 'GOV-5'.

Result of the identification and assessment phase

As part of the DMA process, we identified impacts, risks and opportunities for all ESG areas defined by ESRS across the value chain (upstream, downstream and own operations). Consequently, SP Group has not implemented any further specific scenarios or analyses to identify and assess additional short-, medium- and long-term impacts, risk and opportunities in the areas mentioned. Material impacts, risks and opportunities are assessed to relate to E1 Climate change, E5 Resource use and circular economy, S1 Own workforce, S2 Workers in the value chain and G1 Governance.

E1 Climate change:

GHG emissions throughout the value chain from transport and operations at production facilities increase the risk of climate change. Extreme weather incidents may in the short term cause local transient disruptions in deliveries from the upstream value chain and thereby affect the Group's operations locally. In the long term, this scenario may cause a shortage of resources. The transition to operations with reduced emission levels may have financial consequences for SP Group in the short term. Access to renewable energy sources may vary significantly on a regional scale and over time and may therefore slow down the pace of implementation. Energy-saving initiatives in own activities may contribute to cost reductions.

E5 Resource use and circular economy:

SP Group relies on significant amounts of raw materials and packaging in our production. As we rely on stable supplies, shortages in the upstream value chain may result in resource constraints in our production. SP Group prioritises resource efficiency and works actively with sorting and recycling of plastics from our own production. However, the Group has no control over the further life cycle of packaging after the products have left our factories and move through the downstream value chain.

G1 Governance:

Our business practices and good business conduct affect our productivity, trust from the value chain and retention of our own employees.

Corporate culture, corruption and bribery may have a negative impact on the value chain, with the risk of harming SP Group's reputation. We manage this risk by training all employees of the Group.

E2 Pollution and E3 Water were assessed to be non-material in the assessment phase, while E4 Biodiversity was already assessed to be non-material in the identification phase. It was emphasised that the Group complies with legal requirements, applies standards and has not had any incidents in the areas mentioned. Also, the level of cost risk is low.

E2 Pollution:

Our production and upstream value chain are associated with a risk of pollution of air, water and soil with,

for example, microplastics and substances of very high concern (SVHC). Pollution is not assessed to be determined by physical or transitional conditions in the countries in which we have manufacturing activities, nor is it affected by external pollution incidents.

E3 Water and marine resources:

The Group's consumption of water is relatively low. Our consumption is related to some of our production processes in which water is used for cooling and to general sanitary purposes. Water is not extracted directly from local aquatic environments or marine resources but is supplied by external water suppliers in areas with no identified water scarcity. Water is discharged as waste water in the local sewage systems.

E4 Biodiversity and ecosystems:

We are aware that our activities and raw materials may affect biodiversity and ecosystems. However, we do not anticipate any biodiversity or ecosystem-related issues that will materially affect our production or financial position in the short or long term. We do not own, lease or manage land located in or near protected, biodiversity-sensitive areas, and our land use is relatively limited.

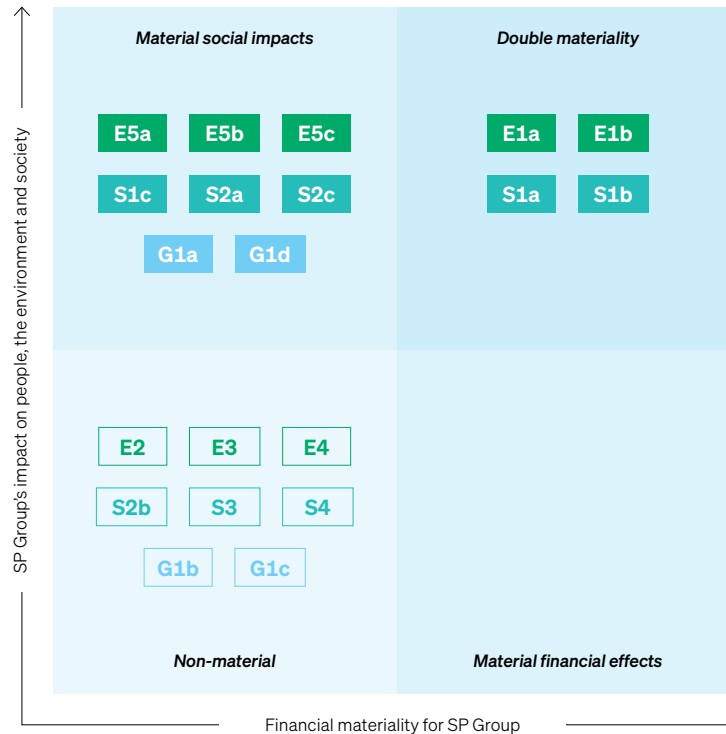
Double materiality matrix

Decision-making process and internal controls

SP Group's Board of Directors and Executive Board regularly assess material impacts, risks and opportunities in connection with strategic decisions. This work follows our annual wheel, which is described in 'Corporate governance' on page 34. In this way, we ensure that our work related to ESG risks is an integral part of the overall risk management.

The results of the DMA were approved by SP Group's CEO and Board of Directors. No other controls were performed.

Figure 3
Double materiality matrix



ESRS standards

- E1 Climate change**
 - E1a Climate change mitigation
 - E1b Energy
- E2 Pollution**
- E3 Water and marine resources**
- E4 Biodiversity and ecosystems**
- E5 Resource use and circular economy**
 - E5a Resource inflow, including resource use
 - E5b Resource outflows related to products
 - E5c Waste
- S1 Own workforce**
 - S1a Working conditions
 - S1b Equal treatment and opportunities for all
 - S1c Other work-related rights
- S2 Workers in the value chain**
 - S2a Working conditions
 - S2b Equal treatment and opportunities for all
 - S2c Other work-related rights
- S3 Affected communities**
- S4 Consumers and end-users**
- G1 Governance**
 - G1a Corporate culture
 - G1b Protection of whistleblowers
 - G1c Management of relationships with suppliers including payment practices
 - G1d Corruption and bribery

IRO-2

ESRS disclosure requirements covered by the sustainability report

The determination of datapoints for reporting was generated based on the results of the DMA, which were processed in a CSRD reporting software solution and quality assured according to the EFRAG IG3 List of ESRS Datapoints (May 2024).

The table provides an overview of the disclosure requirements set out in the sustainability report and is based on the results of the DMA. The overview, presented as a content index, includes references to the relevant page numbers and/or sections of the report where the related information is found. All datapoints related to other EU legislation, see Appendix B to ESRS 2, are listed in the table in the appendix, indicating their location in the sustainability report. Datapoints that were considered to be non-material are listed as 'non-material'.

ESG Policy

SP Group's ESG-related policies have been combined into an ESG Policy.

A description of our ESG-related policies is contained in the report's thematic section on Environment, Social and Governance. These sections also describe goals and measures to contribute to the achievement of the goals.

ESRS	DR	DR title	Page
General disclosures			
ESRS 2	BP-1	General basis for preparation of the sustainability report	45
ESRS 2	BP-2	Disclosures in relation to specific circumstances	46
ESRS 2	GOV-1	Role of Management	47
ESRS 2	GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	50
ESRS 2	GOV-3	Integration of sustainability-related performance in incentive schemes	51
ESRS 2	GOV-4	Statement on due diligence	51
ESRS 2	GOV-5	Risk management and internal sustainability reporting controls	52
ESRS 2	SBM-1	Strategy, business model and value chain	53
ESRS 2	SBM-2	Interests and views of stakeholders	56
ESRS 2	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	58
ESRS 2	IRO-1	Impacts, risks and opportunities (IRO)	64
ESRS 2	IRO-2	ESRS disclosure requirements covered by the sustainability report	68

ESRS	DR	DR title	Page
Environment			
Climate and environment			
ESRS 2	GOV-3-E1	Integration of sustainability-related performance in incentive schemes	51
ESRS E1	E1-1	Transition plan for climate change mitigation	72
ESRS 2	SBM-3-E1	Material impacts, risks and opportunities and their interaction with strategy and business model	58
ESRS 2	IRO-1-E1	Description of the process to identify and assess material impacts, risks and opportunities	64
ESRS E1	E1-2	Policies related to climate change mitigation and adaptation	73
ESRS E1	E1-3	Actions and resources related to climate change policies	74
ESRS E1	E1-4	Targets related to climate change mitigation and adaptation	76
ESRS E1	E1-5	Energy consumption and mix	77
ESRS E1	E1-6	Gross GHG emissions	79
ESRS E1	E1-7	GHG removals and GHG mitigation projects financed through carbon credits	82
ESRS E1	E1-8	Internal carbon pricing	82

ESRS	DR	DR title	Page
Resource use and circular economy			
ESRS E5	E5-1	Policies related to resource use and circular economy	84
ESRS E5	E5-2	Actions and resources related to resource use and circular economy	84
ESRS E5	E5-3	Goals related to resource use and circular economy	86
ESRS E5	E5-4	Resource inflow	87
ESRS E5	E5-5	Resource outflow	88
ESRS E	N/A	Taxonomy	90

ESRS	DR	DR title	Page
Social			
Own workforce			
ESRS 2	SBM-2-S1	Interests and views of stakeholders	56
ESRS 2	SBM-3-S1	Material impacts, risks and opportunities and their interaction with strategy and business model	58
ESRS S1	S1-1	Policies related to own workforce	96
ESRS S1	S1-2	Processes for engaging with own workforce and workers' representatives	96
ESRS S1	S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	96
ESRS S1	S1-4	Taking action on material impacts on own workforce	97
ESRS S1	S1-5	Goals related to own workforce	99
ESRS S1	S1-6	Characteristics of the undertaking's employees	100
ESRS S1	S1-8	Collective bargaining coverage and social dialogue	102
ESRS S1	S1-9	Diversity metrics	103
ESRS S1	S1-11	Social protection	104
ESRS S1	S1-12	Persons with disabilities	104
ESRS S1	S1-14	Health and safety	105
ESRS S1	S1-15	Work-life balance	106
ESRS S1	S1-16	Compensation metrics	107
ESRS S1	S1-17	Incidents, complaints and severe human rights impacts	108

ESRS	DR	DR title	Page
Workers in the value chain			
ESRS 2	SBM-2-S2	Interests and views of stakeholders	56
ESRS 2	SBM-3-S2	Material impacts, risks and opportunities and their interaction with strategy and business model	58
ESRS S2	S2-1	Policies related to value chain workers	109
ESRS S2	S2-2	Processes for engaging with value chain workers	109
ESRS S2	S2-3	Processes to remediate negative impacts	109
ESRS S2	S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	109
ESRS S2	S2-5	Targets related to value chain workers	110
Governance			
ESRS 2	GOV-1-G1	The role of the administrative, management and supervisory bodies	47
ESRS 2	IRO-1-G1	Description of the process to identify and assess material impacts, risks and opportunities	64
ESRS G1	G1-1	Corporate culture and business conduct policies	111
ESRS G1	G1-2	Management of relationships with suppliers	113
ESRS G1	G1-3	Prevention and detection of corruption and bribery	113
ESRS G1	G1-4	Confirmed incidents of corruption or bribery	114
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Environmental (E)

71	ESRS E1 – Climate change
83	ESRS E5 – Resources and circular economy
90	Taxonomy reporting

ESRS E1 – Climate change

E1

Climate change

SP Group's business model incorporates sustainability considerations. It is important to SP Group that we can grow the Group's earnings and activities in a responsible manner. We are aware that our products increase the use of plastics. As a consequence, we take active responsibility for developing our business and production in a way that increasingly reduces negative environmental impacts and contributes to a sustainable development and the transition to a circular economy. Going forward, we will seek to use the screening criteria of the Taxonomy Regulation for input as far as possible before commencing activities. We do not have any activities that exclude us from the EU Paris-aligned benchmarks.

In recent years, we have intensified our efforts to integrate sustainability into our business model. In particular, we have focused on value creation through recycling of plastics in production and utilisation of our own surplus materials from production as well as regenerated materials and raw materials from other players in the plastics industry.

Our efforts should be viewed in light of the global climate challenges and the goal of the Paris Agreement to limit global warming to 1.5°C. This scenario forms the background for the climate risks of relevance to SP Group discussed below.

Physical climate risks

Physical climate risks relate to acute risk scenarios in areas in which we operate. These scenarios involve changes in temperature, wind and water conditions leading to a risk of forest fires and floods.

Climate-related transition risks

Climate-related transition risks relate to the transition to operations with reduced emission levels, which in the short term may have financial consequences in connection with the implementation and maintenance of mitigating measures.

” We are aware that our products increase the use of plastics. As a consequence, we take active responsibility for developing our business and production in a way that increasingly reduces negative environmental impacts and contributes to a sustainable development and the transition to a circular economy.

E1-1

Transition plan for climate change mitigation

SP Group's climate change mitigation plan has been adopted by the Executive Board and includes strategic goals for 2030 that support the transition to a sustainable economy and are inspired by the Paris Agreement's goal of limiting global warming to 1.5°C.

The ability to transition to renewable energy depends on available energy sources or energy supply over which we have no influence, as well as financial resources for replacing machinery and equipment. At SP Group, we do not yet have an overview of the amount of locked-in GHG emissions and therefore no overview of the scope of CapEx for implementing the transition plans. Implementation of plans is a natural part of the companies' day-to-day operations and is secured through ongoing investments as and when needed, giving high priority to sustainable perspectives in the chosen solutions. For 2025, we expect total investments of approximately DKK 200 million in buildings, machinery and equipment. Our CapEx for 2024 amounted to DKK 218 million, no amount of which was applied towards gas-consuming activities.

The transition plan forms an integral part of our strategic sustainability goals, which are based on SDG 9 – Industry, innovation and infrastructure and SDG 12 – Responsible consumption and production. These are described in 'SBM-1'.

Ambitions and plans

- **Transitioning to renewable energy:**
By 2030, our entire production will switch to renewable energy sources, thereby reducing the reliance on fossil fuels and making a direct contribution to global climate goals.
- **Carbon neutrality in Scope 1 and Scope 2:**
We aim to be carbon neutral with respect to both direct and indirect emissions from energy consumption.
- **Contribution to energy optimisation and sustainable solutions:** We are committed to supporting the green transition by offering state-of-the-art plastics solutions that contribute to energy optimisation, insulation, clean water and clean air. In this way, we help customers and society reduce energy consumption and greenhouse gas emissions.

To achieve these goals, SP Group is implementing several initiatives:

- **Transitioning to renewable energy:**
Establishment of solar panel systems at factories and a local solar park, purchase of certificates, signing of power purchase agreements and conversion of car fleet.
- **Design for circularity:**
Engaging with customers about the design of products and packaging that can be included in a circular process after end of use and reduction of the volume of raw materials used.
- **Investments in energy-efficient equipment:**
Ongoing investments in new equipment to reduce energy consumption and increase efficiency, including reduction of gas-consuming activities.
- **Climate-friendly corporate culture:**
The corporate culture supports the commitment to sustainable production and management through incentive programmes, employee involvement in reporting and training.
- **Materials and process optimisation:**
Substitution of regenerated materials for primary materials and optimisation of internal production processes to save energy.
- **Partnerships:**
Participation in industry-wide initiatives and partnerships where sustainable production and management experience is shared.

E1-2

Policies related to climate change mitigation and adaptation

SP Group has drafted an ESG Policy with a separate section on environment and climate that addresses climate change.

The section is inserted below and indicates which areas are covered by the policy and how the selected areas are addressed.

Key stakeholders in relation to the ESG Policy's provisions on climate change include customers, investors and banks.

The ESG Policy embraces the identified IROs and is available on our website. The Policy applies to all parts of the Group, including both employees and suppliers, regardless of geography. The ESG Policy is approved by the Board of Directors.

Excerpts from our ESG Policy: Environment and climate

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

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



Solar panels on the facade of one of our factory buildings in Poland.

E1-3

Actions and resources related to climate change policies

In 2024, as part of SP Group's efforts to reduce direct and indirect greenhouse gas emissions, we continued to invest in solar panel systems, expanded our electric vehicle fleet and invested in new and more efficient production machinery. For taxonomy purposes, solar panels are reported under CM 4.1 Electricity generation using solar photovoltaic technology, and electric cars are reported under CM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles. Single purchases of new machinery are reported under CE 1.1 Manufacture of plastic packaging goods. No action was taken for transport in the upstream value chain with regard to the IROs identified.

Actions going forward rely on the availability of renewable energy and allocation of financial resources to investments in machinery and equipment. The actions are implemented at the initiative of the companies and reflect local needs.

SP Group's key actions are shown in the table on page 76. The following examples are of particular interest to our customers, employees, local communities, investors and banks.

Electric vehicles

We expanded our fleet of electric and hybrid cars from 33² to 40 in 2024.

We have installed charging points at our factories so that guests and employees with an electric car can charge their vehicles.

Charging points for electric and hybrid cars at Gibo Plast A/S.



New machinery

Ulstrup Plast A/S received a new, modern injection moulding machine in 2024 as part of the initiatives to improve production capacity and reduce the environmental impact.

The injection moulding machine is fitted with state-of-the-art energy efficiency and process optimisation technology. The machine is designed to use significantly less energy compared with previous generations, thanks to advanced servomotors and an optimised thermal treatment process. The injection moulding machine also facilitates high-precision manufacturing, thereby reducing materials waste.

The investment is a key element of our long-term sustainability strategy, which focuses on minimising the Group's carbon footprint, optimising resource consumption and promoting circular production methods.



² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.

Solar park in Juelsminde

On 28 February 2024, the City Council of Hedensted Municipality approved a local development plan for the contemplated solar park near Glud on the Juelsminde Peninsula in Denmark. The solar park project will be implemented through Juelsmindehalvøens Solar A/S, a company established by SP Group A/S in collaboration with Palsgaard A/S and Jval Group A/S.

The plant will be able to deliver about 60 GWh annually, corresponding to the power consumption of more than 15,000 households, or the three companies' total power consumption in Denmark. Once completed, the project will make a large proportion of the local private businesses carbon neutral as they will use locally produced green power.

Solar park in Juelsminde in the process of being established



Solar panel systems at the factories

An important part of the transition is the use of renewable energy, which we achieve partly through the establishment of solar panel systems at our factories, partly through the purchase of certificates. By investing in solar panel systems at our factories in Finland, Slovakia and Poland, we have maintained the share of solar energy of our total energy consumption.

In 2023, we expanded our production facilities in Finland, as Coreplast Laitila Oy acquired 18,200 sqm of land in front of the factory. Here, a solar panel system has contributed to the production of green electricity since July 2023.

Solar panel system and installation on roof at Coreplast Laitila Oy in Finland.



A solar panel system was installed on the roof of Ulstrup Plast s.r.o. in Slovakia in September 2023. This system, consisting of 848 solar panels with a total capacity of 300 kW, was put into operation in early 2024.

In its first year of operation, the system produced 220,000 kWh, an annual carbon emission reduction corresponding to the average energy consumption of approximately 55 households. The solar panels now generate a substantial share of the company's total energy consumption and support more sustainable operations.

Solar panel installation at Ulstrup Plast s.r.o. in Slovakia




The utilisation of solar resources represents a long-term investment. These projects mark an important step towards reducing the dependency on fossil fuels and contribute to our goal of minimising environmental impacts.



E1-4

Targets related to climate change mitigation and adaptation

SP Group has defined a number of strategic objectives as part of its climate change work. The objective are not scientifically based, but are set on the basis of our current level and experience. The Executive Board and senior employees have initiated a number of actions and KPIs for Scope 1 and 2 to reduce CO₂ emissions through optimisation of energy consumption and electrification. The actions encompass the identified IROs, for which we expect a derived impact for Scope 3 through the subsidiaries' environmental certifications. Goals and actions are aligned with the 'Environment and climate' section of our ESG Policy, and the progress of efforts and the achievement of goals are monitored on an ongoing basis by the companies and on a quarterly basis by their boards of directors. We do not yet focus on actions for transportation in the upstream value chain.

Strategic goal	Sustainable Development Goal	Action	Status 2024	KPI
Carbon neutrality in Scope 1 and Market-based Scope 2 by 2030		To supplement our own production of renewable power, we purchase certificates and enter into power purchase agreements (PPAs)	81.6% of the power consumption was based on green power	Share of renewable power to be 100% by 2030
		Conversion of car fleet to electric vehicles	Measurement to be established	100% electric car fleet by 2030
		We continuously invest in energy-efficient equipment to reduce energy consumption and increase efficiency	Measurement to be established	All equipment to be 100% electrical
Contribute to production of renewable energy		We collaborate with two local businesses on the Juelsminde Peninsula on the construction of a solar park. Perimeter planting around the solar park will create green recreational areas and promote biodiversity while at the same time making the solar park very discreet in its surroundings	The solar park has been approved for expected establishment in 2025 and commissioning in 2026	Production of power corresponding to 100% of consumption in the Danish factories by 2030
A climate- and environmentally friendly approach to business operations	 	All manufacturing entities to be certified to the ISO 14001 environmental standard	73.5%	All manufacturing entities to be environmentally certified within three years of takeover

E1-5

Energy consumption and mix

SP Group's production processes are intensive and require considerable amounts of energy. The energy consumption primarily relates to electricity and gas for machinery, robots and lighting as well as heating of facilities.

Access to renewable energy sources may vary significantly on a regional scale and over time due to a lack of energy saving/storage options. Energy consumption and energy intensity are therefore considered an important factor in our operations.

To address the negative impacts of fossil fuels, we have taken mitigation measures to ensure a more sustainable energy mix. This includes switching to energy produced via solar panels and converting our car fleet to electric cars.

The relative distribution of our energy consumption is illustrated in Figure 4, which shows that the share of electricity is on the increase.

Figure 4
Relative energy consumption (%)²



² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.

Energy consumption and mix	Unit	2024
(1) Fuel consumption from coal and coal products	MWh	0
(2) Fuel consumption from crude oil and petroleum products	MWh	5,587
(3) Fuel consumption from natural gas	MWh	11,340
(4) Fuel consumption from other fossil sources	MWh	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	10,629
(6) Total fossil energy consumption	MWh	27,555
Share of consumption from fossil sources in total energy consumption	%	32.6%
(7) Consumption from nuclear sources	MWh	183
Share of consumption from nuclear sources in total energy consumption	%	0.2%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	55,482
(10) Consumption of self-generated non-fuel renewable energy	MWh	1,308
(11) Total consumption of renewable energy	MWh	56,790
Share of consumption from renewable sources in total energy consumption	%	67.2
TOTAL ENERGY CONSUMPTION	MWh	84,528

Energy intensity based on net revenue	Unit	2024	2023 ²	% 2024 / 2023
Total energy consumption from activities in high climate impact sectors per net revenue	MWh/ DKK 1,000	0.029	0.033	87.9%

² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.



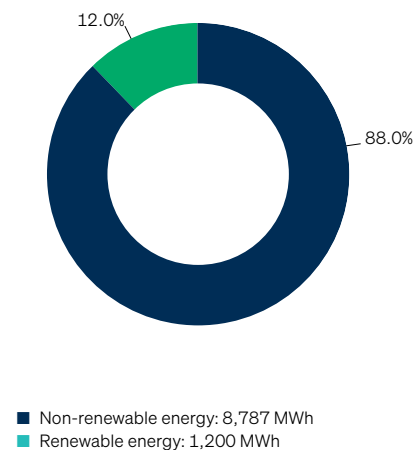
The use of regenerated plastics reduces energy requirements in the value chain.

Own energy production

We produce energy from our own solar panel systems established at the factories in Finland, Poland and Slovakia. Locally sourced gas is converted into heat by incineration. The main consumption is in companies in Denmark, Finland, Latvia, Poland, China and the USA.

Figure 5
Breakdown of energy production in 2024

%



Reporting principles

Energy consumption

Data on energy consumption are reported for summing and verification from the companies' daily systems.

This category also includes self-generated energy from solar panels.

Energy mix

The energy mix for district heating and electricity consumption is reported for fossil, nuclear and recyclable energy sources, respectively.

Energy intensity ratio

Calculated as:

$$= \frac{\text{Total energy consumption (MWh)}}{\text{Net revenue from activities in high climate impact sectors (DKK)}}$$

For revenue, see note 3 to the financial statements.

E1-6

Gross GHG emissions

SP Group's business model and value chain contribute directly and indirectly to greenhouse gas (GHG) emissions through the sourcing of materials, transport along the value chain, operations and production facilities. Our CO₂e emissions from Scope 1 (direct emissions) and Scope 2 (indirect emissions) primarily relate to district heating, electricity and gas purchased and used for heating and production activities.

The largest CO₂e emissions in our value chain stem from upstream and downstream production and transport of raw materials and machinery (Scope 3 – indirect emissions). Raw materials are sourced from high climate impact sectors (Category 1) Raw materials are transported across borders and on a global scale by sea, road and air freight (Category 4).

Co₂ emissions

We have set a strategic goal to become CO₂e neutral in Scope 1 and 2 by 2030. Our Scope 1 CO₂e emissions fell by 23%² relative to the 2023 baseline year. The reduction was attributable to reduced consumption of natural gas due to the transition to district heating.

Scope 2 emissions were calculated according to the location-based and market-based methods.

In the period 2023-2024, we saw an increase in the total power consumption, which has been covered in part by purchases of certificates and power generated from our own solar panels, contributing significantly to the 16%² reduction of location-based Scope 2 CO₂e emissions relative to 2023.

Market-based Scope 2 declined by 13%², also impacted by the purchase of certificates and power generated from own solar panels.

Scope 3 emissions included only the following GHG categories: purchased goods and services (1), fuel- and energy-related activities (3), upstream transportation and distribution (4), waste generated in operations (5), business travel (6) and downstream transportation (9). No data are available for Categories 4 and 9 for the 2023 baseline year, and emissions for the other categories, 2, 7, 8 and 10-15, were not calculated.

In the market-based calculation, Scope 3 represented 92% of total CO₂e emissions.

This sustainability report only contains information on CO₂ since it is assessed as the most significant emission from our activities.

126,510

Total location-based GHG emissions in 2024 (tCO₂e)

112,093

Total market-based GHG emissions in 2024 (tCO₂e)

80%

Of the total power consumption of 62,847 MWh is covered by certificates

² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.

	Unit	Retrospective			Milestones and target years				Annual target (%) / baseline year
		2023 baseline year ²	Development	2024	% 2024 / 2023	2025	2030	(2050)	
Scope 1 GHG emissions									
Gross Scope 1 GHG emissions	tCO ₂ e	4,664	1,079	3,585	77%	N/A	N/A	N/A	N/A
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	-	-	-	-	N/A	N/A	N/A	N/A
Scope 2 GHG emissions									
Location-based									
Gross Scope 2 GHG emissions	tCO ₂ e	23,935	3,882	20,053	84%	N/A	N/A	N/A	N/A
Market-based									
Gross Scope 2 GHG emissions	tCO ₂ e	6,462	827	5,635	87%	N/A	N/A	N/A	N/A
Scope 3 Significant GHG emissions									
Total gross indirect (Scope 3) GHG emissions	tCO ₂ e	N/A	N/A	102,872	N/A	N/A	N/A	N/A	N/A
Category 1: Purchased goods and services		67,578	N/A	82,993	N/A	N/A	N/A	N/A	N/A
Category 3: Fuel- and energy-related activities (not included in Scope 1 or Scope 2)		6,656	N/A	5,820	N/A	N/A	N/A	N/A	N/A
Category 4: Upstream transportation and distribution	Data not available		N/A	7,667	N/A	N/A	N/A	N/A	N/A
Category 5: Waste generated in operations		391	N/A	539	N/A	N/A	N/A	N/A	N/A
Category 6: Business travel		376	N/A	965	N/A	N/A	N/A	N/A	N/A
Category 9: Downstream transportation	Data not available		N/A	4,888	N/A	N/A	N/A	N/A	N/A
Total GHG emissions									
Total GHG emissions Location-based	tCO ₂ e	N/A	N/A	126,510	N/A	N/A	N/A	N/A	N/A
Total GHG emissions Market-based	tCO ₂ e	N/A	N/A	112,093	N/A	N/A	N/A	N/A	N/A

² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.

CO₂ from biogenic emissions is not included in the calculation of total GHG emissions. Scope 1 emissions derive from the consumption of natural gas.

Biogenic emissions	Unit	2024
Scope 1	tCO ₂ e	20
Scope 2, location-based	tCO ₂ e	0
Scope 2, market-based	tCO ₂ e	0
Scope 3	tCO ₂ e	0

Carbon intensity per net revenue	Unit	2024
Total location-based carbon emissions from activities in high climate impact sectors relative to net revenue	tonnes / DKK'000	0.043
Total market-based carbon emissions from activities in high climate impact sectors relative to net revenue	tonnes / DKK'000	0.038

Data quality	Unit	Scope 3 GHG emissions
Primary data	%	N/A
Secondary data	%	N/A

Scope 1 and Scope 2 emissions by source

	Unit	2024
Scope 1		
Fossil fuels	tCO ₂ e	353
Gas	tCO ₂ e	3,160
Refrigerants	tCO ₂ e	72
Scope 2 location-based		
District heating	tCO ₂ e	322
Electricity	tCO ₂ e	19,731
Scope 2 market-based		
District heating	tCO ₂ e	317
Electricity	tCO ₂ e	5,318

Reporting principles

All consumption data are reported in a digital software system in which emissions factors are listed with source references. The software performs an automatic calculation of CO₂e emissions.

Scope 1: CO₂e emissions

Direct Scope 1 GHG emissions

Scope 1 emissions are reported based on the GHG Protocol and include direct energy consumption such as oil, natural gas, LPG, petrol, diesel and refrigerants.

Calculated as:

$$= \text{Sum of total energy consumption (kWh)} \times \text{emissions factor (tonnes CO}_2\text{e/kWh)}$$

Scope 2: CO₂e emissions, location-based

Indirect Scope 2 GHG emissions (tonnes CO₂e)

Scope 2 emissions are reported based on the GHG Protocol and include indirect GHG emissions from the generation of electricity and heat purchased and consumed by the group companies.

Calculated as:

$$= \text{Total energy consumption of} \left(\text{electricity (kWh)} \times \text{emissions factor} \left(\text{tonnes} \frac{\text{CO}_2}{\text{kWh}} \right) + \text{heat (kWh)} \times \text{emissions factor} \left(\text{tonnes} \frac{\text{CO}_2}{\text{kWh}} \right) \right)$$

Scope 2: Market-based CO₂e emissions

Indirect Scope 2 GHG emissions (tonnes CO₂e)

Indirect Scope 2 GHG emissions (tonnes CO₂e) calculated including reduction for electricity purchased under certificates

Calculated as:

$$= \text{Total energy consumption of} \left(\text{electricity (kWh)} \times \text{emissions factor} \left(\text{tonnes} \frac{\text{CO}_2}{\text{kWh}} \right) + \text{heat (kWh)} \times \text{emissions factor} \left(\text{tonnes} \frac{\text{CO}_2}{\text{kWh}} \right) \right)$$

Certificate providers: Denmark: Jysk Energi, Poland: Veolia Energy, Slovakia: Východoslovenská, energetika a.s and Finland: VENI Energia

Scope 3: CO₂e emissions

Indirect Scope 3 GHG emissions (tonnes CO₂e)

Scope 3 emissions are reported based on the GHG Protocol, and the scope of reporting was prioritised based on the conclusions from Gibo Plast A/S' participation in the Danish 'Klimaklar SMV' initiative. The conclusion was that 94% of total CO₂e emissions came from Scope 3, of which 90% derived from the purchase of plastics raw materials for production.

Of the 15 categories in Scope 3, SP Group's 2024 Annual Report 2024 includes:

- Category 1, Purchased raw materials and moulds
- Category 3, Fuel- and energy-related activities
- Category 5, Waste generated in operations
- Category 6, Business travel
- Category 4+9, Upstream and downstream transportation
- Category 4+9, Upstream and downstream distribution

For upstream and downstream transportation, we primarily use

- supplier data and the distance-based method. The reporting includes:
- Raw materials sourced for production, reported under E5-4.
- Delivery, repair and maintenance of moulds and tools used in manufacturing.
- Goods delivered to customers.

For other transportation, the spend-based method is applied.

Total GHG emissions intensity

Total GHG intensity based on net revenue is calculated as follows:

$$= \frac{\text{Total GHG emissions (tCO}_2\text{e)}}{\text{Net revenue from activities in high climate impact sectors (DKK)}}$$

For revenue, see note 3 to the financial statements.

Reporting principles (continued)

Emissions factors

The following sources were applied for emissions factors:

Scope 1:

- **Refrigerants:** Standard emissions factors from Opteon (2023), DEFRA (2024) and Naturvårdsverket (2022)
- **Oil, LPG and natural gas:** Standard emission factors from DEFRA (2024)

Scope 2:

- **District heating:** If an SP Group company was unable to state a supplier-specific emissions factor, the following emissions factors were applied:
 - CTR, HOFOR and VEKS (2024)
 - DEFRA (2024)
 - Energiförtaen (2023)
- **Electricity, location-based and market-based:** Standard emissions factors from AIB (2024) and IEA (2024)

Scope 3:

- **Category 1, purchased raw materials and moulds:** DEFRA (2024), Ecoinvent (3.10)
- **Category 3, fuel- and energy-related activities** IEA (2024), DEFRA (2024) and Energiförtaen (2023)
 - Company cars
 - Fossil: DEFRA (2024)
 - Hybrid and electric: DEFRA (2024), AIB (2024), IEA (2024) and Trafikverket Vägtrafikens utsläpp 2023 (2024)
- **Category 5, Waste generated in operations:** DEFRA (2024), EU & DK Input Output Database (2022)
- **Category 6, Business travel**
 - Hotel: Hotel Footprinting Tool (2024) and DEFRA (2024)
 - Car: DEFRA (2024)
 - Air: DEFRA (2024)
- **Category 4+9: Upstream/downstream transportation/distribution:**
 - NTM (2024)
 - DEFRA (2024)
 - AIB (2024)
 - IEA (2024)

Data type and quality

The share of primary data sources was calculated on the basis of information reported.

Calculated as:

$$= \left(\frac{\text{Number of primary data sources reported}}{\text{Total number of data sources reported}} \right) \times 100$$

E1-7

GHG removals and GHG mitigation projects financed through carbon credits

SP Group does not have any projects for GHG removals or GHG mitigation financed through carbon credits.

E1-8

Internal carbon pricing

SP Group does not use internal carbon pricing schemes in its business.

ESRS E5 – Resources and circular economy

E5

Resources and circular economy

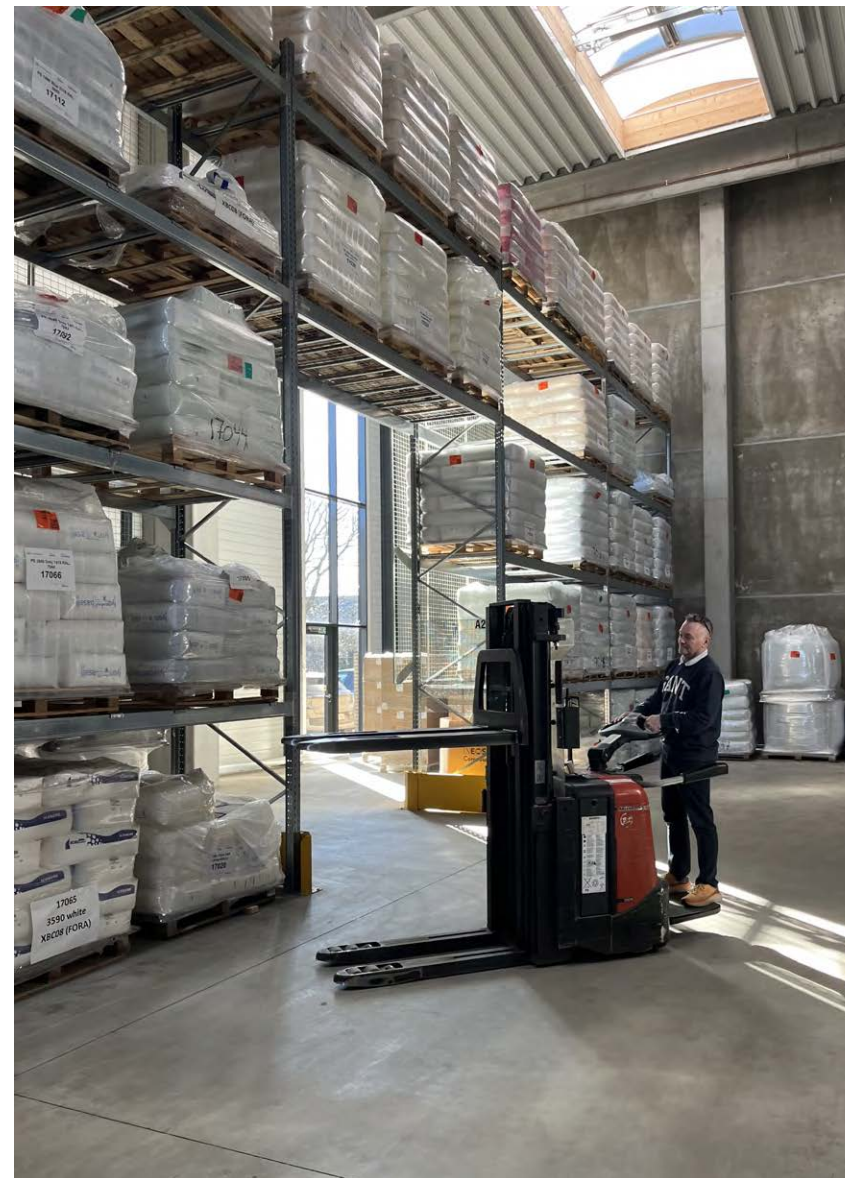
SP Group purchases large quantities of raw materials that include many resources. Among these raw materials are plastic granules, resins, sheets and powders.

We sell a wide range of products, which primarily consist of plastic products. As we are a subsupplier, our plastic products are mainly used as components of our customers' end-products. This results in large quantities of packaging (cardboard and plastics). The companies have no control over what happens with the products and the packaging after they leave our factories, unless return agreements have been concluded.

We sort our waste in accordance with regulations and standards as well as with concrete options for waste sorting in the countries and areas where we operate.

The high consumption of raw materials is a necessity for our operations and entails dependencies on available raw materials. Resource shortages can have negative production and financial impacts, but also foster new ways of thinking in relation to the recycling of materials. The dialogue and engagement with our stakeholders in the upstream and downstream value chain provides insights into new materials and recycling methods.

Jan Sørensen placing incoming raw materials in the warehouse at Dan-Hill-Plast A/S.



E5-1

Policies related to resource use and circular economy

SP Group has drawn up an ESG Policy with a separate environment and climate section that concerns raw materials and circular economy. The section is inserted below and indicates which areas are covered by the Policy and how the selected areas are addressed.

Key stakeholders in relation to the ESG Policy's provisions on resource consumption and circular

economy include customers, suppliers and employees.

The ESG Policy embraces the identified IROs and is available on our website. The Policy applies to all parts of the Group, including both employees and suppliers, regardless of geography. The ESG Policy is approved by the Board of Directors.

E5-2

Actions and resources related to resource use and circular economy

As part of SP Group's work to sharpen our focus on resource use, we continued to work with our customers on the use of bioplastics and regenerated materials and on reuse and use of surplus materials in 2024. These actions were implemented in our downstream and upstream value chain as well as in our own processes and extend into the identified IROs.

Our actions going forward rely on continued customer demand for circular product design and on available disposal systems for sorted waste in the geographical areas where we operate.

The following examples are of particular interest to our customers and suppliers.

Excerpts from our ESG Policy: Raw materials and circular economy

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

Raw materials are sourced according to the companies' ISO 9001- and ISO 14001-certified quality and environmental management systems. This ensures that we comply with all environmental directives, including

REACH, the Candidate List of Substances of Very High Concern and the RoHS Directive.

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

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

” As part of SP Group's work to sharpen our focus on resource use, we continued to work with our customers on the use of bioplastics and regenerated materials and on reuse and use of surplus materials in 2024.

Powder mills at Gibo Plast

As part of our growth strategy, rotational moulding was implemented in our manufacturing processes in 2020. This entailed the need to recycle waste material from the process. In 2024, a powder mill was installed at Gibo Plast in Denmark, which reprocesses plastic waste from the production into powder that is recycled into new products. A similar solution has been established at Gibo Plast's factory in China. This reduces the consumption of raw materials and fosters a circular economy.

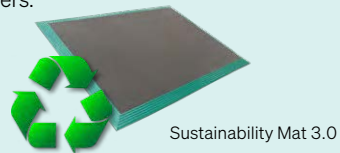


Ergomat Sustainability Mats

Ergomat's products have always been manufactured with long durability in mind. In recent years, however, Ergomat has increased its focus on making sustainable products that not only meet the needs of modern workplaces but also contribute positively to the environment.

Ergomat Sustainability Mats became a reality in 2023. These mats contain between 65% and 100% recycled materials. Ergomat has established a recycling programme in which used mats are collected from customers, granulated and processed into new mats that can then be redistributed to customers.

The recycling programme includes financial gains for customers when they purchase new Ergomat Sustainability Mats. This benefits the environment, safety and customers.



Recycling plastics

Dan-Hill-Plast produces a range of elegant products for SMALLrevolution, including stools, vases and wine coolers. The series is manufactured from recycled type PE and PP plastic waste. The plastic waste is delivered directly from the customer to Dan-Hill-Plast as granules, which ensures efficient and sustainable production.

SMALLrevolution product series manufactured by Dan-Hill-Plast.



Tableware made from bioplastics

SP Group has manufactured the TAKE series, which includes plates, bowls, mugs and glasses for the Rosendahl brand and is made of 98% bio-based plastics. In addition, we have produced a bread basket of the same material for Rosendahl Design Group's Kähler brand. The products have been tested and approved for use in connection with food and were put into production in 2022.





E5-3

Goals related to resource use and circular economy

In connection with our work on resource consumption and a circular economy, the Executive Board, senior executives and senior managers have launched a number of actions and KPIs. The targets have been set based on our current level and experience as well as the conviction that the individual countries will successfully develop waste sorting systems. The actions extend into the identified IROs and are important to achieving SP Group's strategic goals. Achieving the goal of circular use relies on customers' demand for recycled materials for their product designs.

The goal of increased use of regenerated materials and bioplastics and the goal of recycling packaging components are voluntary and have therefore not been set with a view to complying with statutory requirements. The goal for waste sorting has been set to comply with local legislation and, where there is no legislation, to promote a responsible waste sorting culture.

These strategic goals and actions are a translation of the ESG Policy's section on raw materials and circular economy in our companies. The progress of efforts and the achievement of goals are monitored on an ongoing basis by the companies and on a quarterly basis by their boards of directors.

Strategic goal	Sustainable Development Goal	Action	Status 2024	KPI
Circular use		Use of regenerated materials and bio-based plastics for production (resource inflow)	19%	25% of total purchases of plastics raw materials by 2030
		Recycling of packaging components and return pallets (resource outflow)	100%	100% recycling of packaging components and return pallets
Transition to a circular economy		Waste sorting with recycling or other recovery in mind	80%	At least 90% of the total amount of waste must be diverted from disposal by 2030

E5-4

Resource inflow

Resources are supplied to the companies for the manufacture of products, components and production tools. The composition of the resources supplied depends on the demand of SP Group's customers. We focus on a circular economy combined with a goal of eliminating raw material waste, which in 2024 led to an increase in the

use of regenerated materials by 41%² compared with 2023. This entails the side benefit of lower consumption of plastics purchased as a new product and a 30%² increase in the proportion of plastics collected and recycled in the production lines.

” SP Group focuses on a circular economy combined with a goal of eliminating raw material waste, which in 2024 led to an increase in the use of regenerated materials of 41%² compared with 2023.

Resource inflow	Unit	2024	2023 ²
Technical materials			
– Plastics, new products	kg	14,364,791	14,970,035
– Plastics, regenerative materials	kg	3,492,353	2,480,405
– Glass fibre	kg	6,178,232	7,136,414
– Other (e.g. iso, polyol, telene, resin)	kg	3,722,750	2,204,132
– Steel	kg	637,471	344,014
– Aluminium	kg	377,445	123,501
– Cardboard	kg	1,242,833	932,568
– Wood	kg	2,814,216	2,181,127
Biological materials	kg	0	0
Total materials – Technical and Biological	kg	32,830,092	28,286,285
Of which Biological materials	%	0	0
Of which Regenerative materials	%	10.6	8.8

² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.

Reporting principles

Incoming resources

This includes the companies' most significant purchases of materials used for production and packaging, including plastics, glass fibres, resins, wood and cardboard. Volumes of steel and aluminium are primarily related to the purchase of moulds. Purchase volumes are primarily derived from the companies' ERP systems.

In order to avoid double reporting, all purchases in each raw materials category that are resold within the Group are deducted.

Purchases of services such as cleaning, repairs, maintenance, audit or IT services are not included in the reporting, nor are resources related to buildings, machinery, equipment and suppliers.

E5-5

Resource outflow

All SP Group's manufacturing entities focus on generating less waste and increasing the recycling of plastic materials. The products and components supplied by the companies are made of plastic and composite materials, also referred to as thermoplastics and thermosetting plastics. Thermoplastics are characterised by their ability to be recycled as they can be melted and reshaped multiple times. Recycling requires collection, sorting and cleaning before the material is granulated for recycling.

Similarly, we seek to repurpose other waste and surplus materials from our production, including glass fibre, cardboard and metal. At the injection moulding factories, this is done by means of decentralised grinders that ensure that surplus material from the production of each component is immediately ground and led to a closed system together with the plastic material for the next component.

Deliveries from our companies are packed in a proper manner to ensure that products and components are not damaged during transportation. The packaging primarily consists of wood, cardboard and plastic foil that can potentially be recycled.

Our waste primarily comes from the companies' production, warehousing, repair and maintenance activities and from their production engineering departments.

Waste is classified by means of the waste hierarchy set out in the EU Waste Framework Directive (Directive 2008/98/EC) and sorted into fractions defined by legislation or local practices. The companies' reported volumes of waste are based on their own data or data from suppliers.

Recyclable content in products supplied by SP Group

60.6%

Of sold products can be recycled

100.0%

Of the packaging of sold products can be recycled

Waste generated by SP Group's own activities	Unit	2024	2023 ²
TOTAL amount of waste	tonnes	6,274.52	5,106.45
– Of which total amount of waste for disposal	tonnes	1,259.80	887.21
– Of which total amount of waste diverted from disposal	tonnes	5,014.72	4,219.24
Total: Hazardous waste	tonnes	237.91	160.25
<i>Hazardous waste for disposal</i>	tonnes	87.92	83.01
– Incineration	tonnes	0.00	0.00
– Landfill	tonnes	0.00	0.00
– Other disposal	tonnes	87.92	83.01
<i>Hazardous waste diverted from disposal</i>	tonnes	149.99	77.24
– Sorted for reuse	tonnes	0.00	0.00
– For recycling	tonnes	149.99	77.24
– Other recovery	tonnes	0.00	0.00
Total: Non-hazardous waste	tonnes	6,036.63	4,946.20
<i>Non-hazardous waste for disposal</i>	tonnes	1,171.89	804.20
– Incineration	tonnes	359.29	381.16
– Landfill	tonnes	812.60	423.04
– Other disposal	tonnes	0.00	0.00
<i>Non-hazardous waste diverted from disposal</i>	tonnes	4,864.74	4,142.00
– Sorted for reuse	tonnes	0.00	0.00
– For recycling	tonnes	3,945.46	3,152.87
– Other recovery	tonnes	919.28	989.13
Proportion of waste for disposal	%	20.08	17.37

² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.

Reporting principles

Outbound products with recyclable content

This includes the volume of thermoplastics purchased in relation to the total volume of raw materials purchased for use in the production of components. The volume of thermoplastics sent for recycling has been deducted.

Calculated as:

$$= \left(\frac{\text{Volume of thermoplastics purchased} - \text{volume of thermoplastics sent for recycling}}{\text{Volume of thermosetting plastics purchased} + (\text{volume of thermoplastics purchased} - \text{volume of thermoplastics sent for recycling})} \right) \times 100$$

Outbound packaging with recyclable content

This includes the volume of purchased wood, cardboard and plastic foil.

Calculated as:

$$= \left(\frac{\text{Volume of purchased wood} + \text{cardboard} + \text{plastic foil}}{\text{Volume of packaging purchased}} \right) \times 100$$

Outbound resources – recycling (diverted from disposal)

This includes resources from the companies, which sort into the fractions plastics, foil, wood, cardboard, metals and "other" for recycling. The fraction "other" is classified as hazardous waste and contains, among other things, batteries and printer cartridges. The largest volume originates from warehousing, manufacturing and maintenance activities.

Plastics that are recycled internally are included under 'Non-hazardous – for recycling'.

Incineration waste from Denmark, Norway, Sweden, Finland and the Netherlands is included in 'Other recovery'.

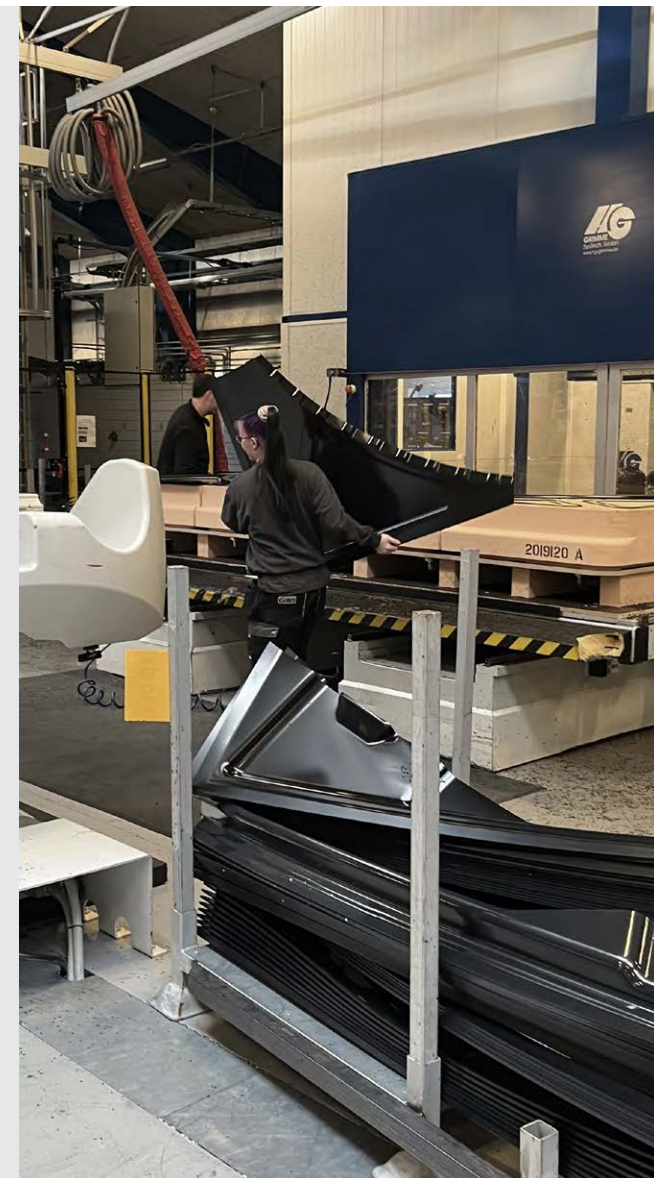
Calculation: The volume is calculated upon collection.

Waste for disposal

This includes waste not diverted from disposal.

Calculation: The volume is calculated upon collection.

Segregating scrap, which is ground and collected in bags so that it can be sent for recycling.



Taxonomy reporting

Taxonomy for sustainable investment

A working group at SP Group has performed a systematic assessment of all activities listed in the Taxonomy Regulation to identify the extent to which the Group's economic activities qualify as contributing substantially to the EU's climate goals of:

- Climate change mitigation
- Climate change adaptation
- Sustainable use and protection of water and marine resources
- Transition to a circular economy
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

We have identified a number of economic activities that are comprised by the Taxonomy Regulation's activities. These activities are related to manufacturing, energy, transport, building and construction and real estate as well as services related to the energy performance of buildings.

However, in our assessment, these activities do not qualify as contributing substantially to one or more of the six environmental goals, and we have not performed an assessment of the criteria under DNSH.

For purposes of the reporting, turnover, operating expenditure (OpEx) and capital expenditure (CapEx) are therefore attributed to those areas that are Taxonomy-eligible (A2) but do not qualify as contributing substantially to sustainability (A1). In addition, the Group's total turnover, CapEx and OpEx (B) are disclosed.

Activities assessed to be Taxonomy-eligible (A2) include the sale of insulated plastic components for the building industry, the production of plastic packaging for the pharmaceutical industry and machinery and equipment for these lines of production. To this should be added purchases/leasing of company cars, new windows at Medico-Pack A/S, the installation of solar panel systems at Ulstrup Plast s.r.o in Slovakia, the installation

of charging points and the construction of new buildings.

Turnover is primarily driven by the activity 'Manufacture of plastic packaging articles', which amounts to DKK 176.6 million

CAPEX is also primarily driven by 'Manufacture of plastic packaging articles' at DKK 11.6 million and 'Construction of buildings' at DKK 83.4 million.

OPEX is primarily driven by 'Manufacture of plastic packaging articles' totalling DKK 9.4 million and 'Acquisition and Ownership of buildings' at DKK 4.9 million

Taxonomy – Turnover

	2024		Substantial contribution criterion						DNSH (Do No Significant Harm) criteria							Proportion of turnover (A.1) or (A.2) Year 2023	Category (Enabling activity)	Category (Transitional activity)
	Code	Turnover DKK '000	Proportion of turnover %	Climate change mitigation Y/N; N/EL	Climate change adaptation Y/N; N/EL	Water and marine resources Y/N; N/EL	Pollution Y/N; N/EL	Circular economy Y/N; N/EL	Biodiversity and ecosystems Y/N; N/EL	Climate change mitigation Y/N	Climate change adaptation Y/N	Water and marine resources Y/N	Pollution Y/N	Circular economy Y/N	Biodiversity and ecosystems Y/N			
A. TAXONOMY-ELIGIBLE ACTIVITIES																		
A.1 Environmentally sustainable activities (Taxonomy-aligned)																		
Turnover derived from environmentally sustainable activities (A.1)		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00							0		
Of which enabling		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00							-	E	
Of which transitional		0	0.00	0.00												-		T
A.2 Taxonomy-eligible but not environmentally sustainable activities (Non-Taxonomy-aligned activities)																		
Manufacturing of energy efficiency equipment for buildings	CM 3.5	21,748	0.74	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.52		
Manufacturing of plastic packaging articles	CE 1.1	176,577	6.04	N/EL	N/EL	N/EL	N/EL	EL	N/EL							6.79		
Turnover derived from Taxonomy-eligible activities which are not environmentally sustainable (A.2)		198,325	6.79	0.74%	0.00%	0.00%	0.00%	6.04%	0.00%							7.31		
A. Total turnover from Taxonomy-eligible activities (A.1+A.2)		198,325	6.79	0.74%	0.00%	0.00%	0.00%	6.04%	0.00%							7.31		
B. NON-TAXONOMY-ELIGIBLE ACTIVITIES																		
Turnover derived from non-Taxonomy-eligible activities		2,723,403	93.21															
TOTAL (A + B)		2,921,728	100															

Reporting principle

Turnover

The proportion of turnover derived from Taxonomy-eligible activities divided by total turnover, which is the actual turnover recognised in the financial year 2024.

Calculated as:

$$= \left(\frac{\text{Turnover from Taxonomy-eligible activities (DKK)}}{\text{Total net turnover (DKK)}} \right) \times 100$$

Note: In order to avoid double reporting, only turnover from external sales is included. SP Group's total turnover (revenue) is stated in note 3 to the financial statements on page 137.

Taxonomy – CapEx

	2024		Substantial contribution criterion							DNSH (Do No Significant Harm) criteria							Proportion of CapEx (A.1.) or (A.2.) Year 2023	Category (Enabling activity)	Category (Transitional activity)
	Code	CapEx	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards			
		DKK '000	%	Y/N; N/EL	Y/N; N/EL	Y/N; N/EL	Y/N; N/EL	Y/N; N/EL	Y/N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N			
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1.Environmentally sustainable activities (Taxonomy-aligned)																			
CapEx derived from environmentally sustainable activities (A.1)		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00								0		
Of which enabling		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00								%	E	
Of which transitional		0	0.00	0.00													%		T
A.2 Taxonomy-eligible but not environmentally sustainable activities (Non-Taxonomy-aligned activities)																			
Manufacturing of energy efficiency equipment for buildings	CM 3.5	0	0.00	EL	N/EL	N/EL	N/EL	N/EL	N/EL										0.11
Electric power generation using solar technology	CM 4.1	439	0.20	EL	N/EL	N/EL	N/EL	N/EL	N/EL										1.13
District heating/cooling distribution	CM 4.15	158	0.07	EL	N/EL	N/EL	N/EL	N/EL	N/EL										1.57
Installation and operation of electric heat pumps	CM 4.16	530	0.24	EL	N/EL	N/EL	N/EL	N/EL	N/EL										0.54
Production of heat/cool using waste heat	CM 4.25	0	0.00	EL	N/EL	N/EL	N/EL	N/EL	N/EL										0.04
Transport by motorbikes, passenger cars and light commercial vehicles	CM 6.5	6,003	2.76	EL	N/EL	N/EL	N/EL	N/EL	N/EL										2.42
Construction of new buildings	CM 7.1	83,420	38.30	EL	N/EL	N/EL	N/EL	N/EL	N/EL										15.47
Renovation of existing buildings	CM 7.2	2,709	1.24	EL	N/EL	N/EL	N/EL	N/EL	N/EL										3.36
Installation, maintenance and repair of energy-efficient equipment	CM 7.3	2,677	1.23	EL	N/EL	N/EL	N/EL	N/EL	N/EL										0.75
Installation, maintenance and repair of charging points for electric vehicles in buildings (and parking lots linked to buildings)	CM 7.4	229	0.11	EL	N/EL	N/EL	N/EL	N/EL	N/EL										0.19
Acquisition and ownership of buildings	CM 7.7	299	0.14	EL	N/EL	N/EL	N/EL	N/EL	N/EL										0.00
Professional services related to the energy performance of buildings	CM 9.3	21	0.01	EL	N/EL	N/EL	N/EL	N/EL	N/EL										0.00
Manufacturing of plastic packaging articles	CE 1.1	11,621	5.34	N/EL	N/EL	N/EL	N/EL	EL	N/EL										12.29
Conservation, including restoration, of habitats, ecosystems and species	BIO 1.1	0	0.00	N/EL	N/EL	N/EL	N/EL	N/EL	EL										0.09
CapEx derived from Taxonomy-eligible activities which are not environmentally sustainable (A.2)		108,106	49.63	44.30	0.00	0.00	0.00	5.34	0.00										37.97
A. Total CapEx of Taxonomy-eligible activities (A.1+A.2)		108,106	49.63	44.30	0.00	0.00	0.00	5.34	0.00										37.97
B. NON-TAXONOMY-ELIGIBLE ACTIVITIES																			
CapEx derived from non-Taxonomy-eligible activities		109,713	50.37																
TOTAL (A + B)		217,819	100																

Reporting principle

CapEx

The proportion of CapEx derived from Taxonomy-eligible activities divided by total CapEx.

Calculated as:

$$= \left(\frac{\text{CapEx of Taxonomy-eligible activities (DKK)}}{\text{Total CapEx (DKK)}} \right) \times 100$$

Note: CapEx includes investments in Taxonomy-eligible machinery and equipment, installations, buildings, etc. For each company, investments are the actual investments recognised in the financial year 2024.

SP Group's total CapEx is stated in notes 15, 16 and 17 to the financial statements, pages 144-147.

Taxonomy – OpEx

	2024			Substantial contribution criterion							DNSH (Do No Significant Harm) criteria							Proportion of OpEx (A.1) or (A.2) Year 2023	Category (Enabling activity)	Category (Transitional activity)		
	Code	OpEx	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	%				E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																						
A.1 Environmentally sustainable activities (Taxonomy-aligned)																						
OpEx derived from environmentally sustainable activities (A.1)	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							0						
Of which enabling	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							0	E					
Of which transitional	0	0.00	0.00													0			T			
A.2 Taxonomy-eligible but not environmentally sustainable activities (Non-Taxonomy-aligned)																						
Manufacturing of energy efficiency equipment for buildings	CM 3.5	563	0.63	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.02						
Electric power generation using solar technology	CM 4.1	26	0.03	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.03						
District heating/cooling distribution	CM 4.15	22	0.02	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.20						
Installation and operation of electric heat pumps	CM 4.16	78	0.09	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.04						
Production of heat/cool using waste heat	CM 4.25	102	0.11	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.00						
Transport by motorbikes, passenger cars and light commercial vehicles	CM 6.5	1,049	1.16	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.62						
Renovation of existing buildings	CM 7.2	1,741	1.93	EL	N/EL	N/EL	N/EL	N/EL	N/EL							2.14						
Installation, maintenance and repair of energy-efficient equipment	CM 7.3	451	0.50	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.22						
Installation, maintenance and repair of charging points for electric vehicles in buildings (and parking lots linked to buildings)	CM 7.4	28	0.03	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.00						
Acquisition and ownership of buildings	CM 7.7	4,873	5.41	EL	N/EL	N/EL	N/EL	N/EL	N/EL							3.38						
Professional services related to the energy performance of buildings	CM 9.3	80	0.09	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.07						
Manufacturing of plastic packaging articles	CE 1.1	9,402	10.44	N/EL	N/EL	N/EL	N/EL	EL	N/EL							9.47						
OpEx derived from Taxonomy-eligible activities which are not environmentally sustainable (A.2)		18,416	20.45	10.01	0.00	0.00	0.00	10.44	0.00							16.18						
A. Total OpEx of Taxonomy-eligible activities (A.1+A.2)		18,416	20.45	10.01	0.00	0.00	0.00	10.44	0.00							16.18						
B. NON-TAXONOMY-ELIGIBLE ACTIVITIES																						
OpEx derived from non-Taxonomy-eligible activities		71,645	79.55																			
TOTAL (A + B)		90,061	100																			

Reporting principle

OpEx

The proportion of OpEx derived from Taxonomy-eligible activities divided by total OpEx.

Calculated as:

$$= \left(\frac{\text{OpEx of Taxonomy-eligible activities (DKK)}}{\text{Total OpEx (DKK)}} \right) \times 100$$

Note: OpEx includes maintenance and repairs of Taxonomy-eligible machinery and equipment, installations, buildings, etc. For each company, expenses are the actual expenses recognised in the financial year 2024.

Taxonomy – nuclear energy-related and fossil gas-related activities

SP Group has no nuclear energy-related or fossil gas-related activities, as can be seen from the table below.

Row	Type of energy	
Nuclear energy-related activities		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas-related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of power generation facilities that produce electricity using fossil gaseous fuels.	No
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

ESRS S1 – Own workforce

S1

Own workforce

Our employees are instrumental in ensuring our strong operational and safety performance. We take our responsibility to our employees very seriously, as they are one of our most important stakeholder groups in terms of both interest and influence.

At SP Group, we are committed to carrying on our activities in a responsible manner, regardless of where in the world our business activities are located. We work purposefully to ensure basic labour rights, which involves maintaining privacy through confidential handling and processing of personal data, focusing on creating a workplace free from harassment, bullying and violence and providing a safe, respectful and rewarding work life for the individual employee. We do this because we believe that this creates value both for the individual and for SP Group.

All manufacturing entities must implement a certified health and safety management system

that documents health and safety efforts through the mapping of health and safety conditions and ensures that health and safety matters are addressed in a responsible manner. Our efforts to obtain and maintain health and safety certifications extend beyond compliance with national statutory requirements and international conventions in the health and safety area.

We have a special focus on providing healthy working conditions and access to training and education for all our employees. The premise for these efforts is that everyone can participate. Actively promoting diversity and equal opportunities for all groups is therefore very important to us.

The significant impacts, risks and opportunities identified in relation to our own employees' rights by means of the materiality assessment are described below, along with the policies, actions, measurements and goals we have implemented to address them.

” We work purposefully to ensure basic labour rights, which involves maintaining privacy through confidential handling and processing of personal data, focusing on creating a workplace free from harassment, bullying and violence and providing a safe, respectful and rewarding work life for the individual employee. We do this because we believe that this creates value both for the individual and for SP Group.

S1-1

Policies related to own workforce

SP Group's social responsibility policy is part of our ESG Policy.

The ESG Policy also includes policies on employment and labour conditions; human trafficking and forced labour, including child labour; women in management; diversity and discrimination, including on the grounds of age, gender, race and disability; human rights; data protection; and whistleblower programme.

The ESG Policy embraces the identified IROs and is available on our website. The Policy applies to all parts of the Group, including both employees and suppliers, regardless of geography. The ESG Policy is approved by the Board of Directors.

Excerpts from our ESG Policy: Social responsibility

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

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

S1-2

Processes for engaging with own workforce and workers' representatives

The involvement of employees and their representatives is formalised in the companies through health and safety organisations, workplace assessments, union representatives and works councils, performance interviews, information meetings and internal audits.

In addition, the companies have established a number of channels through which employees can make suggestions for continuous improvements of working conditions, and the corporate culture also supports an informal dialogue.

S1-3

Processes to remediate negative impacts and channels for own workforce to raise concerns

Employees and persons working on behalf of SP Group are encouraged to report concerns or complaints regarding harassment, alleged legally or financially inappropriate conduct or other matters through SP Group's independent whistleblower mechanism, as detailed in G1-1, Business conduct. Through onboarding training and regular management communication, we ensure that our employees are familiar with these mechanisms and know how to use them. The whistleblower programme is anchored in our ESG Policy.

The employees of the companies can also use the internal channels to raise concerns about working conditions.

S1-4

Taking action on material impacts on own workforce

Safety and health

As part of the establishment of health and safety management systems in the companies, a systematic risk assessment of labour conditions is carried out. The risk assessment covers work processes, materials used and the use of machinery, tools and safety equipment as well as the physical and psychological working environment.

The risks identified are managed through policies and rules, including for safety and preparedness as well as responsible conduct. These policies and rules are implemented through concrete measures such as technological adaptation to facilitate work tasks, aids, equipment and work instructions, training and instruction, upgrading of skills, flexible working conditions, health insurance and health-care programmes and communication on risks and implemented improvements.

'Completely safe' campaign

A strong health and safety environment is essential to employee well-being and productivity.

As production environments are subject to special risks, SP Group works continuously to improve conditions by investing in new machinery and involving employees in workspace planning.

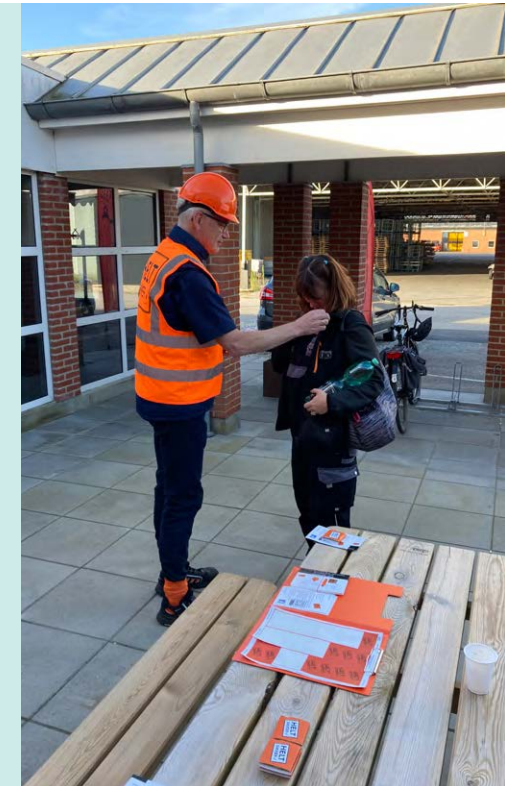
By way of example, in 2024, Gibo Plast A/S and Dan-Hill-Plast A/S intensified their efforts to prevent workplace accidents and strengthen employee awareness of safety. The health and safety organisations have conducted campaigns focused on risk assessment and

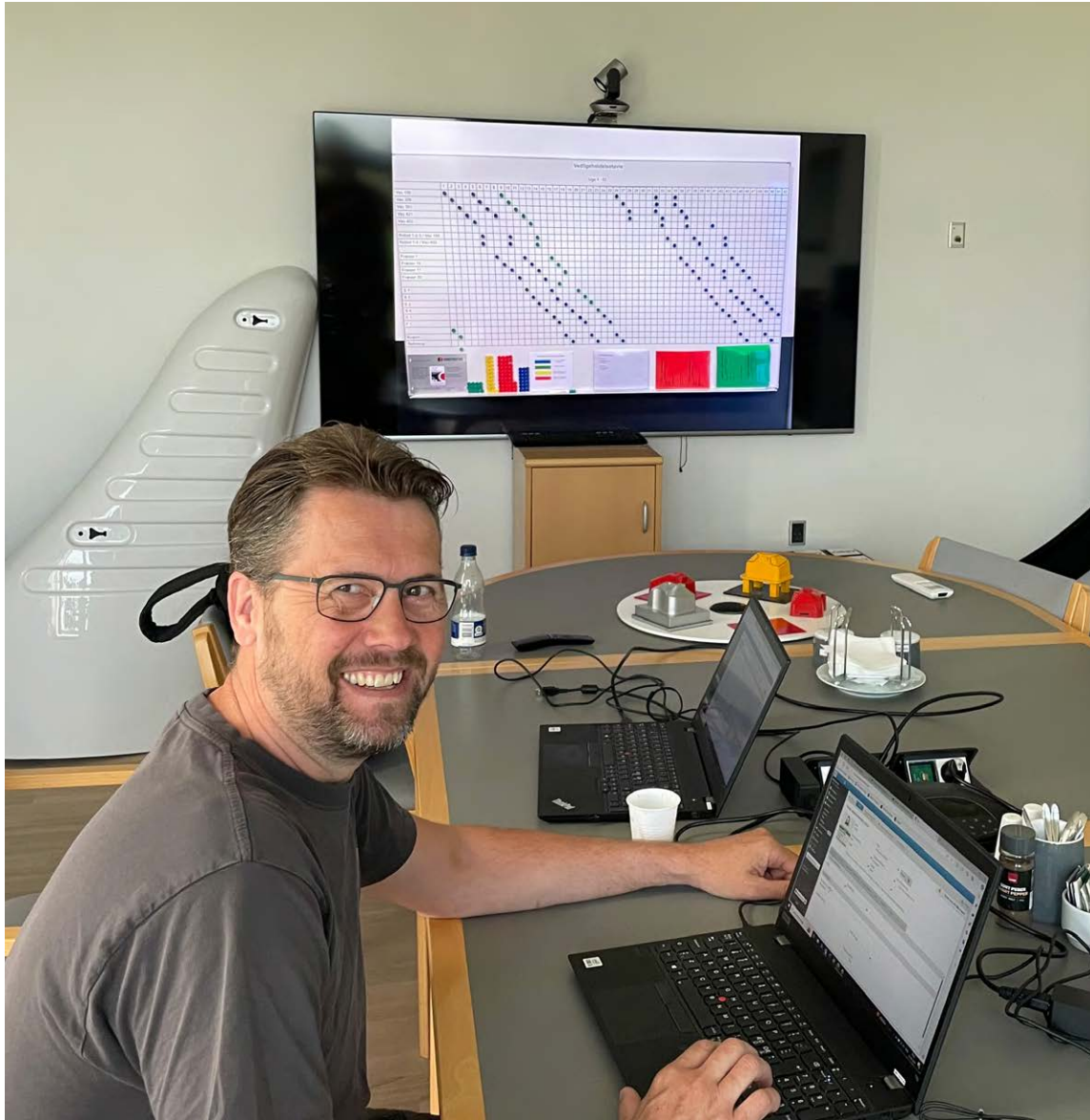
ergonomics to minimise the risk of injuries and attrition.

Gibo Plast A/S conducted a 'Completely Safe' campaign with a focus on correct working techniques in production and administration. The campaign emphasised sound ergonomic principles for lifting, pulling, pushing and working postures.

The intensified efforts have created a greater awareness of safety among the employees, and it is expected that the initiatives will contribute to fewer workplace accidents and improved well-being.

The Health and Safety Committee welcoming a Gibo Plast A/S employee for a 'Completely safe' working day.





Training and skills development

We have a strategic focus on internal training and skills development. All employees have the opportunity to upgrade their skills through supplementary and further education and training.

Access to supplementary education and training is very important to the well-being and continuous development of our employees. We therefore offer our employees the opportunity to undergo supplementary training – also during work hours.

All employees are given the opportunity to participate in performance reviews to identify education and training opportunities and needs, set individual employee goals and evaluate performance in the past period.

Head of Maintenance
Søren Karstensen from Gibo
Plast A/S participating in
internal training in the use of a
new software system.





S1-5

Goals related to own workforce

As part of our work on social conditions for our own workforce, SP Group has initiated a number of actions and KPIs that are important to achieving our strategic goals. Achieving these goals requires us to obtain occupational health and safety certifications to ensure a safe and healthy working environment. In addition, we maintain our focus on statutory requirements regarding the representation of the underrepresented gender at management levels.

The ISO 45001-certified subsidiaries have their own goals, which are set and monitored in cooperation with the health and safety organisations. The goals are set in connection with the statutory annual review.

In order to support subsidiaries that are not yet certified, SP Group's Executive Board and ESG manager have defined the following strategic goals and actions. In setting the goals, we assume that the implementation of health and safety management systems ensures systematic efforts in relation to the physical and psychological working environment.

Strategic goal	Sustainable Development Goal	Action	Status 2024	KPI
Health and well-being on the job		Implementation of certifiable health and safety management systems in the companies	38.2%	100% of our manufacturing entities to be certified by 2028 or three years after takeover
		Completion of employee surveys of the physical and psychological working environment in the companies at least every three years	Measurement to be established	100% of our companies to conduct employee surveys of the physical and psychological working environment by 2030
		Completion of employee performance interviews in the companies	Measurement to be established	80% of our employees to participate in employee performance reviews in 2030
Safety		Systematic implementation of safety inspections in manufacturing entities	38.2%	100% of our manufacturing entities to perform systematic safety inspections by 2028 or three years after takeover
		Systematic recording of near-misses in the manufacturing entities	38.2%	100% of our manufacturing entities to record near-misses by 2028 or three years after takeover
Peace of mind on the job		Establishment of local channels for raising concerns in the companies	Measurement to be established	100% of our manufacturing entities to establish channels by 2028 or three years after takeover
Non-discrimination and equal opportunities		Ensuring equal representation of men and women in the recruitment of employees for management positions	Measurement to be established	100% of all recruitments by 2026
		Gender distribution in Management	27%	<ul style="list-style-type: none"> 40% women on the Board of Directors by 2026 30% women at other management levels by 2030

S1-6

Characteristics of the undertaking's employees

SP Group strives for diversity in age and gender and in educational and professional background in management and in the organisation as a whole.

The composition and diversity of our employees reflect our ESG Policy's principle of mutual trust and respect across differences.

Average number of employees, see note 7 to the financial statements, page 138.

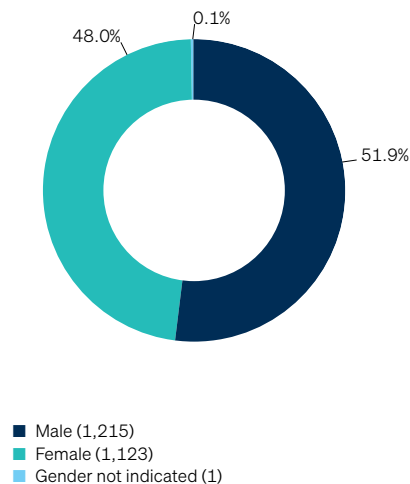
Countries with at least 10% of SP Group's total workforce	Unit	Number of employees (HC)
Denmark	number	719
Poland	number	1,018

Employee composition	Unit	Number of employees (HC)
Male	number	1,215
Female	number	1,123
Other	number	0
Not reported	number	1
Total no. of employees	number	2,339

2,339

employees in SP Group at end-2024

Figure 6
Employee composition in 2024
%



Reporting principles

Characteristics of the undertaking's employees

The number of employees is stated as headcount (HC), which indicates the number of unique employee IDs on the Group's payroll lists and covers both hourly paid employees, salaried employees, management and Executive Board. The data represent the status at 31 December 2024.

The total number of employees is reported in the following gender categories: Female, Male, Other or Gender not indicated (HC).

Calculation:

The sum of all employees in each of the four gender categories

Number of employees per country

For each report, the number is recorded as the number of employees with a connection to the country in which the activity is located.

Calculation:

The sum of all employees with a connection to each country

Proportion of employees per country, illustrated in SBM-1

Calculated as:

$$= \left(\frac{\text{Sum of all employees in a country}}{\text{Total number of employees}} \right) \times 100$$

Employees of Gibo Plast, Denmark, paying their colleagues at Gibo Plast, Poland, a visit.



Employee composition in 2024	Female	Male	Other	Not indicated	Total
Number of permanent employees (number of persons/FTEs)	1,027	1,108	0	1	2,136
Number of temporary employees (number of persons/FTEs)	95	105	0	0	200
Number of non-guaranteed hours employees (number of persons/FTEs)	1	2	0	0	3

Rate of employee turnover in 2024

14.2%

Employee turnover in 2024

331

Employees who left the undertaking during the reporting period

Reporting principles

Number of employees by contract type

For each report, the number is recorded as the number of employees in each of the four gender categories broken down by permanent employees, temporary employees and non-guaranteed hours employees.

Calculation:

The sum of all employees in each gender category and for each contract type

Employee turnover

The number of employees who left SP Group in 2024 includes employees who left voluntarily or due to dismissal, retirement or death.

The rate of employee turnover is calculated as the number of employees who left the Group's companies in the reporting year divided by the total number of employees at the end of the year.

Calculated as:

$$= \left(\frac{\text{Sum of all resignations}}{\text{Total number of employees at the end of the year}} \right) \times 100$$

S1-8

Collective bargaining coverage and social dialogue

The use of collective agreements for regulating terms of employment depends on the geographical and cultural context of the companies. SP Group is Danish-owned and Danish-managed, and the Danish model for the protection of workers is therefore embedded in our culture. All our employees have freedom of association and have the right to express their opinions and participate in or elect representatives to collective bodies. Employees of the Danish entities appoint representatives for works councils and health and safety committees, in which they meet with local management.

Among the employees of our companies in Europe, 33.6% are covered by collective agreements. The majority of these are employed in Denmark. Social dialogues have been established in Denmark and Poland, where 38.8% and 98.2%, respectively, of the employees are covered by workers' representation.

Covered by collective agreement in 2024

76.2%

Proportion of SP Group employees in Denmark covered by collective agreement

Coverage	Collective bargaining coverage		Social dialogue
	Employees – EEA (for countries with > 50 employees representing > 10% of all employees)	Employees – non-EAA (estimate for regions with > 50 employees representing > 10% of all employees)	Workplace representation (EEA only) (for countries with >50 employees representing >10% total employees)
0-19%	Poland	-	-
20-39%	-	-	Denmark
40-59%	-	-	-
60-79%	Denmark	-	-
80-100%	-	-	Poland

Reporting principles

Collective agreements

Calculated for employees in own workforce in Europe in Q4.

Covered employees are the number of employees (HC) covered by collective agreements that SP Group is obliged to comply with.

Calculated as:

$$= \left(\frac{\text{Sum of all employees covered by collective agreements in Europe}}{\text{Total number of employees in Europe}} \right) \times 100$$

Proportion of employees per country

Calculations are stated for each country with employees in Europe:

$$= \left(\frac{\text{Sum of all employees covered by a collective agreement in a country}}{\text{Total number of employees in a country}} \right) \times 100$$

Workers' representatives

Includes trade union representatives appointed or elected by trade unions and/or duly elected representatives freely elected by the employees of the Group's companies.

Proportion of employees represented by a workers' representative

Number of employees (HC) in a country represented by a worker's representative.

Calculated as:

$$= \left(\frac{\text{Sum of all SP Group employees in a country with a workers' representative}}{\text{Total number of SP Group employees in the country}} \right) \times 100$$

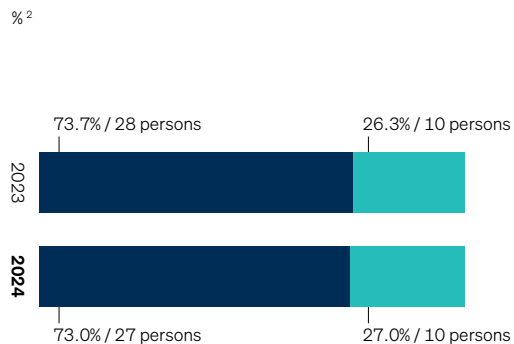
S1-9

Diversity metrics

SP Group has a strong focus on diversity and inclusion. We strive to create an inclusive culture where employees can be their authentic selves. This is part of our commitment to ensure non-discrimination and equal opportunities for all.

SP Group's Management comprises the supreme governing body, the Board of Directors (referred to in GOV-1) and other management levels, which consist of the Executive Board and the Group's other executives and senior managers.

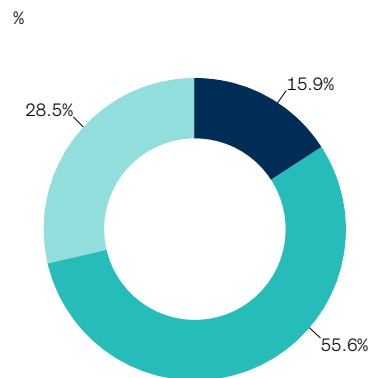
Figure 7
Diversity at SP Group's other management levels



■ Male: **27** / (28)
■ Female: **10** / (10)

² Historical data are not covered by PwC's limited assurance report on the sustainability reporting.

Figure 8
Distribution of employees by age in 2024



■ Under 30 years: 377
■ Between 30 and 50 years: 1,321
■ Over 50 years: 677

Reporting principles

Gender distribution in Management

The number of executives and senior managers is broken down by the gender categories female and male (HC). Executives and senior managers are employees on the Executive Board (management level 1) and the Group's other executives and senior managers (management level 2). The data represent the status at the end of the year.

Calculated as:

$$= \left(\frac{\text{Sum of all executives and senior managers broken down by gender}}{\text{Total number of executives and senior managers}} \right) \times 100$$

Age distribution among employees

For purposes of the diversity reporting, the age composition is calculated as the distribution of employees (HC) into three age groups: 0-30 years, 30-50 years and +50 years, based on the number of employees in the Group's companies and their age at the end of the year.

In relation to the total number of employees in S1-6, double counting can occur in the diversity reporting, as some employees have job functions in more than one of the Group's companies.

Calculated as:

$$= \left(\frac{\text{Sum of all employees in an age group}}{\text{Total number of employees}} \right) \times 100$$

S1-11

Social protection

SP Group wants all employees to be covered by social protection programmes in connection with sickness, unemployment, work-related injury, parental leave and retirement.

In 2024, all employees of the Group's companies were protected against loss of income due to the above-mentioned life events.

Reporting principles

Social protection

Social protection refers to all the measures that provide access to healthcare and income support in the event of major life events such as the loss of a job, being sick and in need of medical care, giving birth and raising a child or retiring.

The reporting includes SP Group's own employees.

S1-12

Persons with disabilities

SP Group has a culture of flexibility and adaptation to meet the needs of its employees. This means that we actively support efforts to help people at risk of falling outside the labour market through flexible job arrangements and other municipal and government programmes. This creates tolerant and inclusive workplaces for the benefit of both existing and future employees.

Persons with disabilities

This includes counting and reporting on employees (HC) who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. Data have been collected based on information about special employment terms.

Employees with disabilities in 2024

1.7%

Proportion of own employees with disabilities

Proportion of employees with disabilities

Calculated as:

$$= \left(\frac{\text{Sum of all employees with disabilities}}{\text{Total number of employees}} \right) \times 100$$

” SP Group has a culture of flexibility and adaptation to meet the needs of its employees. This creates tolerant and inclusive workplaces for the benefit of both existing and future employees.

S1-14

Health and safety

SP Group wants to create a safe and healthy working environment for our employees. This is achieved through the companies' systematic health and safety management and investments in machinery offering good working conditions. The use of the machinery should generally benefit the employees. Employees are involved in the planning of workspace layout as well as the location of the machines to ensure maximum benefits for employees, optimise the working environment and

efficiency and reduce the risk of work-related accidents. Worktime lost due to accidents was calculated at a rate of accidents of 11.1 (LTIFR) in 2024.

The companies are required to report incidents on a quarterly basis and to establish corrective and preventive actions.

Health and safety data	Unit	2024
Proportion of own workforce covered by the companies' health and safety management systems based on statutory requirements and/or recognised standards or guidelines	%	100
Number of fatalities as a result of work-related injuries	number	0
Number of fatalities as a result of work-related ill health	number	0
Number of work-related lost time accidents (LTI)	LTI	42
Number of work-related no time lost accidents	number	30
Number of recorded cases of work-related illness	number	0
Number of working days lost to injuries, accidents, fatalities and work-related illness	working days	441

Reporting principles

Proportion of employees covered by HS (health and safety) management system based on statutory requirements

In relation to the total number of employees in S1-6, double counting can occur in the reporting of employees covered by management systems, as some employees have job functions in more than one of the Group's companies.

The proportion is calculated as the proportion of companies with employees that reported employees in Q4.

Calculated as:

$$= \left(\frac{\text{Number of companies with employees}}{\text{Number of companies with reported employees}} \right) \times 100$$

Fatalities

Calculated as fatalities as a result of work-related injuries or work-related ill health.

Incidents

Total number of incidents/accidents, including fatalities as a result of work-related injuries and work-related ill-health.

Lost Time Incidents

A lost time incident is defined as a sudden incident in the context of work which causes injury to a person's physical or psychological health and causes at least one day's absence after the day of the injury.

No Lost Time Incidents

A no lost time incident is defined as a sudden incident in the context of work which causes injury to a person's physical or psychological health but causes less than eight hours of absence.

Calculated as:

$$\begin{aligned} & \text{Sum of number of fatalities} \\ & + \\ & \text{Number of lost time incidents} \\ & + \\ & \text{Number of no lost time incidents} \end{aligned}$$

S1-15

Work-life balance

Reporting principles (continued)

LTIFR (Lost Time Incident Frequency)

The number of lost time incidents per million working hours.

The total number of working hours reflects the actual number of hours worked by all the Group's own employees during the reporting year.

Calculated as:

$$= \left(\frac{\text{Number of lost time incidents}}{\text{Total number of working hours}} \right) \times 1,000,000$$

Work-related ill health (cases of work-related disorders)

Cases of work-related illness/ill health recorded in the Group's systems, reported in the companies or identified by the companies based on medical surveillance during the reporting period.

The reporting may include cases of work-related ill health discovered during the reporting period among persons who were previously part of the workforce.

Days lost

Days lost are calculated as the number of days lost (as work-related injuries and fatalities as a result of work-related accidents and work-related ill health and fatalities as a result of ill health), including the first full day and the last day of absence. The calculation is based on calendar days, to the effect that days when the affected person is not scheduled for work (e.g. weekends, holidays) count as days lost.

SP Group wants our employees to have the feeling of balance between their work and private life. This is supported by a healthy culture in the companies and by giving our production employees the opportunity to work either day, evening or night shifts and our administrative employees the opportunity to work from home. Both factors contribute positively to the employees' work-life balance. All employees of our companies also have the right to take family-related leave.

11.1%

Percentage of eligible employees taking family-related leave

Work-life balance	Unit	2024
Percentage of employees entitled to family-related leave	%	100
Percentage of eligible employees taking family-related leave	%	11.1
Percentage of eligible female employees taking family-related leave	%	11.0
Percentage of eligible male employees taking family-related leave	%	11.1
Percentage of eligible "other" employees taking family-related leave	%	0
Percentage of eligible employees with non-disclosed gender taking family-related leave	%	100

Reporting principles

Family-related leave

Family-related leave includes maternity leave, paternity leave, parental leave and carers' leave that is available to employees under national law and/or collective agreements.

Calculated as:

$$= \left(\frac{\text{Number of employees taking leave}}{\text{Number of employees eligible for leave}} \right) \times 100$$

S1-16

Compensation metrics

SP Group recognises our employees' right to equal pay for men and women, and the actual conditions for 2024 have therefore been investigated and mapped.

The calculation of the gender pay gap is based on all employees employed in 2024 and includes men and women.

The pay gap was calculated at 27.1%. The gap is mainly due to the fact that there are three times as many men discharging managerial positions as women.

Pay gap in 2024

27.1%

Gender pay gap, basic salary

Annual remuneration ratio in 2024

28.5

Reporting principles

Gender pay gap

The gender pay gap, defined as the gap in average pay between female and male employees, has been calculated as a percentage of the average pay level of male employees. All employees who were paid during the period are included, and only fixed remuneration components are included in the calculation.

Calculated as:

$$= \left(\frac{\text{Gross average pay for men} - \text{gross average pay for women}}{\text{Gross average pay for men}} \right) \times 100$$

Annual remuneration ratio

The annual total remuneration of the highest paid individual to the median annual total remuneration for all employees (excluding the highest paid individual). The calculation includes both fixed and variable remuneration components.

Calculated as:

$$= \frac{\text{Annual remuneration of the highest paid individual}}{\text{Annual remuneration to the median for all employees}}$$

The calculation of the remuneration ratio has been annualised, to the effect that all employees who were not employed for the whole of 2024 are excluded. This also applies to employees working reduced hours.

S1-17

Incidents, complaints and severe human rights impacts

No work-related incidents and/or complaints or severe infringements of human rights were recorded within SP Group's own workforce in 2024. Nor did the companies receive any related fines, sanctions or compensation.

For purposes of the assessment of severe human rights impacts, it is assumed that incidents and other impacts are reported through the whistleblower programme or through the internally established channels for employees of our companies.

Incidents of discrimination in 2024

0

Total number of incidents of discrimination

Incident	Unit	2024
Total number of incidents of discrimination, including harassment	number	0
Number of complaints from own workforce	number	0
Amount of fines, sanctions and compensation	DKK	0
Total number of severe human rights incidents – own workforce:		
Of which human rights incidents within the meaning of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.	number	0
Amount of fines, sanctions and compensation related to incidents within the meaning of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.	DKK	0

Reporting principles

Incidents of discrimination, including harassment

The number of discrimination-related incidents reported via the grievance mechanisms of SP Group's companies, i.e. incidents of or complaints about abuse on the basis of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation or other relevant forms of discrimination involving internal and/or external stakeholders across operations during the reporting period.

Number of complaints

This is the total number of complaints lodged via SP Group's grievance mechanism, which is available to all stakeholders.

Fines, sanctions and compensation

Total amount of fines, compensation and fines for damage resulting from incidents and complaints.

Severe human rights incidents

Severe human rights incidents (child and forced labour) include instances of lawsuits, formal complaints through SP Group's whistleblower programme and serious allegations in public reports or the media, where these are connected to our own workforce.

This only includes incidents where SP Group has declared itself in agreement with the facts relating to the incident.

ESRS S2 – Workers in the value chain

S2

Workers in the value chain

The increased international scope of SP Group entails an increased risk of becoming involved in activities in countries that do not comply with international human rights conventions or with business partners failing to act responsibly. We therefore keep a sharp watch on current and potential risks at suppliers and business partners in relation to respect for human rights.

Our efforts to prevent and mitigate these risks rely on the relationship and cooperation with our suppliers regarding the use and handling of raw materials.

S2-1

Policies related to value chain workers

To ensure protection of value chain workers, we engage in ongoing dialogue and cooperation with our suppliers and monitor whether they assume responsibility for the efforts in this area. This work is based on the companies' ISO 9001 quality management certifications, which include supplier management alongside evaluations of suppliers' efforts in relation to environmental and social conditions.

Key suppliers to SP Group companies are obliged to comply with our Supplier Code of Conduct, which is based on our ESG Policy.

If a supplier fails to meet the requirements of our Supplier Code of Conduct, the business agreement may be terminated with immediate effect. This process has been strengthened by the establishment of the ESG function, which has made it possible to follow up on all Group entities and their business partners.

S2-2

Processes for engaging with value chain workers

There are no formalised procedures and processes for engaging with value chain workers. SP Group plans to introduce screening of key suppliers of raw materials and tools in 2025. This will also enable us to identify any negative impacts and risks at suppliers and engage in a dialogue on mitigation actions, see the disclosure requirements of ESRS S2-3 and S2-4.

SP Group's Supplier Code of Conduct comprises the following areas:

- Human rights, including protection of privacy and non-discrimination
- Employment conditions, including health and safety, working hours and pay and fair working conditions
- Working conditions, including freedom of association and collective agreements, forced and child labour, non-discrimination and equal opportunities

S2-5


Targets related to value chain workers

SP Group primarily engages with suppliers in the EU, many of whom have already been certified by independent third parties in relation to quality, the environment and health and safety. Therefore, it is our fundamental assumption that working conditions generally meet high standards of health, safety and labour rights. We expect our suppliers to prioritise the well-being of their employees and to work responsibly and in accordance with applicable legislation and good practice.

Accordingly, we do not plan to engage directly with value chain workers or their representatives in order to set specific targets and follow up on results. Instead, we plan to monitor employee conditions indirectly via information available in electronic portals or systems, where we can continuously monitor relevant data. Should a situation require further investigation, we will actively contact the supplier to engage in dialogue and clarify the facts.

Digital monitoring is conducted with a focus on strengthening the work on social conditions for value chain workers and lifting efforts to a higher strategic level at the Group. A KPI has been defined for these efforts. This work is an important step towards achieving our strategic goals for sustainability and social responsibility. The plan was developed in a close partnership between the Executive Board and our ESG manager, and it was subsequently presented to the companies at a joint strategy meeting setting the stage for further implementation across the Group.

” We expect our suppliers to prioritise the well-being of their employees and to work responsibly and in accordance with applicable legislation and good practice.

Strategic goal	Sustainable Development Goal	Action	Status 2024	KPI
Reasonable and fair working conditions for value chain workers		Establishing formal procedures for screening of key supplier ESG matters.	(Base year) Data not available	All key suppliers work to establish reasonable and fair working conditions by 2027

ESRS G1 – Governance

G1

Governance

For SP Group, running a healthy business requires good corporate governance. For us, this is closely linked to requirements of accountability, ethics and proper conduct. As part of our work on sustainability and corporate social responsibility, we focus on integrating standards for anti-corruption, data protection and tax payment across the Group. We have also established a whistleblower programme allowing both internal and external stakeholders to raise concerns about irregularities in our activities.

It is crucial for the trust in SP Group of customers, business partners, employees and other stakeholders that our efforts are embedded in day-to-day operations and reflected in our daily interactions. We have therefore adopted policies that define goals and frameworks for our initiatives and assign roles and responsibilities for implementing the principles.

G1-1

Corporate culture and business conduct policies

SP Group's Management develops, promotes and evaluates its business conduct through our ESG Policy and reports, where relevant. The ESG Policy also addresses data protection and tax.

The mechanisms for identifying, reporting and investigating concerns about unlawful conduct or conduct inconsistent with our ESG Policy comprise the control function of the Board of Directors and the Executive Board, see 'GOV-1', and our dialogue-based corporate culture and employee training.

The functions within the Group that are most at risk in respect of corruption and bribery are managers and employees with external contact to suppliers and business partners.

Whistleblower scheme

To ensure compliance with good business practices, SP Group has established a whistleblower programme allowing any person associated with the Group to report in confidence any suspected non-compliance with our policies and guidelines, laws and regulations as well as any other serious concerns. Reports go directly to the chairman of SP Group's Audit Committee, who is an independent shareholder-elected member of SP Group's Board of Directors.

Upon receipt of a report, the chairman of the Audit Committee immediately makes an assessment to determine whether a report is unfounded or calls for further investigation. If it is considered

that a report needs to be investigated further, an investigation will be initiated. Whistleblowers are protected in accordance with the law.

The chairman of the Audit Committee may not disclose the identity of the whistleblower to

persons who are not directly involved in the investigation. Any form of retaliation against a whistleblower is prohibited.

Excerpts from our ESG Policy:

Governance

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

Anti-corruption

SP Group does not engage in corruption in any form, whether it be extortion, bribery, embezzlement, fraud, facilitation payments, nepotism, cartel formation or conflicts of interest. We do not offer or promise any form of bribe for the purpose

of exerting undue influence on public-sector employees, judges or business relations, nor do we receive, accept or participate in any form of bribe. This ensures that we comply with relevant international standards and conventions.

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

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

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

Whistleblower scheme

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

” To ensure compliance with good business practices, SP Group has established a whistleblower programme allowing any person associated with the Group to report in confidence any suspected non-compliance with our policies and guidelines, laws and regulations as well as any other serious concerns.

G1-2

Management of relationships with suppliers

SP Group's practice for paying its suppliers is to comply with agreed payment terms. There is no formal policy on this.

The companies' approach to social and environmental criteria for the selection of suppliers is based on our Supplier Code of Conduct and the need to receive goods of the expected quality in a timely manner. These relationships between the companies and suppliers are governed by the companies' ISO 9001 quality management certifications.

G1-3

Prevention and detection of corruption and bribery


At SP Group, we have a clear policy for preventing, detecting and handling corruption and bribery. Our ESG Policy underlines our wish to maintain a high level of integrity and responsibility across our external relations and that we do not participate in corruption in any form, whether it be extortion, bribery, embezzlement, fraud, facilitation payments, nepotism, cartel formation or conflicts of interest. We do not offer or promise any form of bribe for the purpose of exerting undue influence on public-sector employees, judges or business partners, nor do we accept any form of bribe. This ensures that we comply with relevant international standards and conventions.

Any incidents of corruption or bribery are dealt with by an investigating committee which ensures that executives and senior managers involved in the matter do not have access to the reports. Reports go directly to the chairman of SP Group's Audit Committee, who is an independent shareholder-elected member of SP Group's Board of Directors.

We are actively working to prevent, detect and handle all aspects of corruption and bribery. We do this by means of our ESG Policy and our whistleblower programme, which have been communicated to all the companies, which are in charge of all further communications to their employees. By accepting our Supplier Code of Conduct when signing business agreements, our suppliers commit to comply with the Group's anti-corruption requirements. This ensures that all parties acting on behalf of SP Group are subject to the commitments to not participate in any form of corruption or bribery.

Since 2016, we have used employee training material on corruption and bribery for the purpose of ensuring a certain level of awareness among

the employees in relation to bribery, the receipt of gifts, participation at functions, etc. The use of the training material and the scope of training have not been monitored. In 2024, the material was upgraded to a digital version that allows for digital recordings. In connection with this upgrade, the Executive Board set goals and defined the framework for the training programme. The programme provides the employees with insight into anti-corruption rules and helps them understand when they are at risk of becoming engaged in corruption and what their lines of action are. Employees in risk functions must complete the new digital training and, going forward, new employees taking up risk functions must complete the training programme as part of their training plan.

Strategic goal	Sustainable Development Goal	Action	Status 2024	KPI
Prevention and handling of corruption and bribery		SP Group conducts training for all employees in risk functions	(Base year) Data not available	All employees in risk functions must complete the training programme on corruption and bribery by 2026.

G1-4

Confirmed incidents of corruption or bribery

SP Group pursues a zero-tolerance approach to all forms of corruption and bribery, both in-house at SP Group and at our suppliers. Our preventive measures are therefore targeted at our employees, whom we guide and support in handling attempts at corruption. As regards our external relations acting as representatives of SP Group or taking part in our business activities as suppliers, customers or other business partners, we emphasise our approach to corruption through our Supplier Code of Conduct, contracts, monitoring and dialogue.

No incidents of corruption or bribery were identified in 2024.

Reporting principles

Number of convictions for violation of anti-corruption and anti-bribery laws

The number of lawsuits pending or closed during the reporting period.

Amount of fines for violation of anti-corruption and anti-bribery laws

The total amount of fines paid and unpaid in DKK during the reporting period.

Number of confirmed incidents of corruption or bribery

Stated as the number within the reporting year, reported to group entities.

Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents

Stated as the number within the reporting year, reported to group entities.

Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery

Stated as the number within the reporting year, reported to group entities.

G1-5

Political influence and lobbying activities

SP Group's political influence and lobbying activities are limited to memberships of Danish Industry (DI) and the Danish Plastics Federation. The Board of Directors is informed about the activities and decides on continued membership.

Datapoints in ESRS 2 and topical ESRS

The table below illustrates the datapoints in ESRS 2 and topical ESRS that derive from other EU legislation.

Disclosure requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation reference (3)	EU Climate Law reference (4)	Page	Materiality
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	Indicator no. 13 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II		47	Material
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		47	Material
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator no. 10 Table #3 of Annex 1				51	Material
ESRS 2 SBM-1 Involvement in activities related to fossil fuels, paragraph 40 (d) i	Indicator no. 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453 (6), Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) ii	Indicator no. 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	Indicator no. 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (7), article 12(1), Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, article 12(1), Delegated Regulation (EU) 2020/1816, Annex II			Not material

Disclosure requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation, reference (3)	EU Climate Law reference (4)	Page	Materiality
Environment						
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/1119, article 2(1)	72	Material
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, article 12.1 (d) to (g), and article 12.2			Not material
ESRS E1-4 GHG emission reduction targets, paragraph 34	Indicator no. 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: Alignment metrics	Delegated Regulation (EU) 2020/1818, article 6		76	Material
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex 1				77	Material
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator no. 5 Table #1 of Annex 1				77	Material
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator no. 6 Table #1 of Annex 1				77	Material
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation(EU) 2020/1818, article 5(1), 6 and 8(1)		79	Material
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Indicator no. 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: Alignment metrics	Delegated Regulation (EU) 2020/1818, article 8(1)		79	Material

Disclosure requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation, reference (3)	EU Climate Law reference (4)	Page	Materiality
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, article 2(1)		Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II, Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a)		Article 449a of Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47;				Not material
ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 (c)		Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk				Not material
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449a of Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking book – Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral				Not material
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II			Not material
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1					Not material

Disclosure requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation, reference (3)	EU Climate Law reference (4)	Page	Materiality
ESRS E3-1 Water and marine resources, paragraph 9	Indicator no. 7 Table #2 of Annex 1					Not material
ESRS E3-1 Dedicated policy, paragraph 13	Indicator no. 8 Table #2 of Annex 1					Not material
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator no. 12 Table #2 of Annex 1					Not material
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	Indicator no. 6.2 Table #2 of Annex 1					Not material
ESRS E3-4 Total water consumption in its own operations in m ³ per million EUR net revenue, paragraph 29	Indicator no. 6.1 Table #2 of Annex 1					Not material
ESRS 2 – IRO 1 – E4 Paragraph 16 (a) i	Indicator no. 7 Table #1 of Annex 1					Not material
ESRS 2 – IRO 1 – E4 Paragraph 16 (b)	Indicator no. 10 Table #2 of Annex 1					Not material
ESRS 2 – IRO 1 – E4 Paragraph 16 (c)	Indicator no. 14 Table #2 of Annex 1					Not material
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24 (b)	Indicator no. 11 Table #2 of Annex 1					Not material
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24 (c)	Indicator no. 12 Table #2 of Annex 1					Not material
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	Indicator no. 15 Table #2 of Annex 1					Not material
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator no. 13 Table #2 of Annex 1				88	Material
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator number 9 Table #1 of Annex 1					Not material

Disclosure requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation, reference (3)	EU Climate Law reference (4)	Page	Materiality
Social						
ESRS 2 – SBM3 – S1 Risk of incidents of forced labour, paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				58	Material
ESRS 2 – SBM3 – S1 Risk of incidents of child labour, paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				58	Material
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				96	Material
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		96	Material
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator number 11 Table #3 of Annex I				96	Material
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator number 1 Table #3 of Annex I				96	Material
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				96	Material
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		105	Material
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				105	Material
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		107	Material

Disclosure requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation, reference (3)	EU Climate Law reference (4)	Page	Materiality
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				107	Material
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				108	Material
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD, paragraph 104 (a)	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, article 12(1)		108	Material
ESRS 2 – SBM3 – S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	Indicators number 12 and number 13 Table #3 of Annex I				58	Material
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				109	Material
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicators number 11 and number 4 Table #3 of Annex 1				109	Material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 19	Indicator no. 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, article 12(1)		109	Material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		109	Material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator no. 14 Table #3 of Annex 1				109	Material
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator no. 9 Table #3 of Annex 1 and Indicator no. 11 Table #1 of Annex 1					Not material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	Indicator no. 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, article 12(1)			Not material

Disclosure requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation, reference (3)	EU Climate Law reference (4)	Page	Materiality
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator no. 14 Table #3 of Annex 1					Not material
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1					Not material
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	Indicator no. 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, article 12(1)			Not material
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator no. 14 Table #3 of Annex 1					Not material
Governance						
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator no. 15 Table #3 of Annex 1				111	Material
ESRS G1-1 Protection of whistleblowers, paragraph 10 (d)	Indicator no. 6 Table #3 of Annex 1				111	Material
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	Indicator no. 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		114	Material
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	Indicator no. 16 Table #3 of Annex 1				114	Væsentligt