



OUR COMMITMENT TO SUSTAINABLE DEVELOPMENT

The Purpose of our Commitment

The purpose of this policy commitment is to outline what we expect from our company and business relations in terms of responsible business conduct and sustainable development. Our commitment supports our business decision making at all levels and provide a frame of reference for how we want to deal with business opportunities and risks in the context of direct and indirect sustainability impacts. Our general commitment as well as other policies are applicable to all Asetek's employees, products, services and organizational units as well as our business relations.

Our Commitment

As the global leader in high performance liquid cooling solutions for gamers, enthusiasts, and data center operators, Asetek is committed to providing cutting edge technology that responds to the challenges of the world and promotes sustainable development.

We believe that sustainable behavior in every aspect of our business is a natural prerequisite for building stronger relationships with customers, employees, and contributing to positive development in society.

Our Core Principles

Asetek is committed to contribute to social, environmental, and economic sustainable development.

Our commitment is founded on respect for internationally recognized core principles on human rights (including labor rights), the environment (including climate) and anti-corruption as reflected in the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. This commitment is embedded in our strategy and business operations worldwide as the globally applicable UNGPs and the OECD guidelines provide a level playing field for our worldwide operations.

We respect the rule of law and comply with national regulations in all countries in which we operate.

We respect human rights by embedding this policy commitment in all our policies and processes in line with the UN Guiding Principles on Business and Human Rights.

We commit to promote and support environmentally sustainable practices. We will continuously work to reduce our own adverse environmental impacts by applying and developing climate and environmentally friendly services, solutions, and technologies in our operations and product range.

We commit to being open and transparent about our business activities. We will not accept any form of bribery, corruption, or fraud.

Our commitment will be made operational by continuously identifying, preventing or mitigating potential and actual adverse impacts on the international principles for responsible business conduct that we honor (UNGPs/OECD). We will apply a systematic approach in our management of the principles and conduct impact assessments to identify actual and potential adverse impacts in our business practices and value

chain. We will also address findings related to our product range, operating contexts, or new business relationships.

We will conduct our operations in accordance with the Danish principles for good corporate governance.

We will manage adverse impacts that we may cause or contribute to, or to which we are directly linked through our business relations. If we become aware of an adverse impact that we cause or contribute to, we will seek to ensure access to remedy for the affected persons or stakeholders or notify the appropriate authorities.

We will provide timely, regular, and reliable information on our business practices, our impact assessments and how we manage adverse impacts to all relevant shareholders. We believe regular assessments and transparent communication will help anchor our commitment and spur sustainable development throughout our company.

Our Expectations for Employees of Asetek

Our employees all hold a key to respecting and promoting our commitment to sustainable development – thereby enabling sound and sustainable business practices and responsible economic growth of Asetek.

We expect all Asetek team members to honor and abide by our commitment, and we encourage our team members to alert management of any actual or potential adverse impacts that Asetek may cause or contribute to through our practices, services, or products. We expect all of management to respect and promote our commitment among our employees as ambassadors for positive impact.

In the case we cause or contribute to actual adverse impacts, we commit to provide access to remedy or to contact the appropriate authorities, as necessary.

Our Expectations for Business Relations of Asetek

We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on several key suppliers for the delivery of our products. Responsible business relationships with our suppliers and business relations in general are therefore central to the success of our business.

Our expectations for our business relationships are based on the same global minimum standard for responsible business conduct to which we hold ourselves accountable.

We expect all our business relationships to work towards meeting the global minimum standard as outlined in the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. They should avoid causing or contributing to adverse impacts on human rights, the environment, and anti-corruption, and should address any actual adverse impacts that arise. Our expectations are detailed further in our Code of Conduct for Responsible Business Relations ([LINK](#)).

We encourage responsible business conduct and sustainable development at all levels of our value chain. We commit to using or building our leverage as a company to encourage others to address their severe impacts and move towards meeting the globally-accepted standard (UNGPs/OECD).

Asetek Supports the UN Sustainable Development Goals

We support the UN Sustainable Development Goals by means of our Asetek Commitment to Sustainable Development and our sustainability strategy. Wherever possible and appropriate, we will integrate the global



goals into our business operations and we will continuously communicate about our contribution to the realization of the goals we contribute to.

Related policies

In line with our overall commitment to sustainable development, our related core policies and theme policies also align with the UNGPs/OECD guidelines and describe our ambition to neither cause nor contribute to adverse social, environmental or economic impacts within specific areas of interest.

By way of explicit commitments and expectations, our core policies and theme policies address the (potential) direct impacts we could create because of our own operations, as well as the (potential) indirect impacts we could create because of our business relations’ activities. The policies outline how we expect to identify, prevent, mitigate and account for sustainability risks and performance of our own operations, and of those of our business relations.

Our sustainability policy framework comprises five types of sustainability policies and practices related to sustainable development in Asetek, specifically:

1. **Asetek Commitment to Sustainable Development Policy** is a generic policy that overarches all Asetek’s other sustainability policies and is applicable for all products and services.
2. **Core policies** are related to core environmental, social and governance issues and are applicable for all Asetek’s products and services.
3. **Theme policies** are related to thematic issues that we consider to be material for Asetek’s business.
4. **Responsible Business Relations** sets forth our expectations and requirements towards all of Asetek’s business relations.
5. **Compliance Management** entails concrete mechanisms and systems that Asetek has implemented to comply with our sustainability polices and secure sustainable development.

ASETEK COMMITMENT TO SUSTAINABLE DEVELOPMENT			
CORE POLICIES	THEME POLICIES	RESPONSIBLE BUSINESS RELATIONS	COMPLIANCE MANAGEMENT
<ul style="list-style-type: none"> • Environment • Human Rights • Anti-corruption 	<ul style="list-style-type: none"> • Staff Handbook • Diversity • Lobbying 	<ul style="list-style-type: none"> • Business Relationship Code of Conduct 	<ul style="list-style-type: none"> • Whistleblower • Grievance mechanism (Tell us mechanism)

References to Sector Standards and UN Principles

Asetek’s Commitment to Sustainable Development and related policies have been developed with respect for the following sector standards and UN principles:

- UN Global Compact (UNGC)
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Universal Declaration on Human Rights
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises



- Rio Declaration on Environment and Development
- UK Modern Slavery Act
- UK Bribery Act
- Responsible Business Alliance (RBA)
- Dodd-Frank Act

Approval and Revisions

Our sustainability policy is developed and approved by the board of directors of Asetek.

Our policy commitment will be revisited bi-annually as a minimum and revised if necessary.

Reporting and Communications

The policy commitment is publicly accessible on Asetek's webpage and communicated both internally and externally to ensure that we maintain focus on respect principles for human rights, the environment, and anti-corruption.

We will communicate on progress and compliance with our policy commitment in Asetek's annual report on corporate social responsibility.

Compliance and Misconduct

Lack of compliance with Asetek's Commitment to Sustainable Development and related policies can lead to reprimands and ultimately have consequences for the terms of employment in worst case scenarios. All such cases are dealt with by top management or board of directors in consultation with the locally involved parties. External expertise will be involved if necessary.

Aalborg, February 13, 2021

[Board of Directors]