



# Responsibility and sustainability at Nomeco



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# About the report

The enclosed information represents Nomeco first sustainability report. The report is based on our EcoVadis disclosure, which aligns with the Ten Principles of the UN Global Compact.

All metrics are based primarily on 2023 data, but we also disclose 2021 and 2022 data for consistency and comparability. We have addressed topics that are of most significant interest to our stakeholders by conducting a materiality assessment.

The report is in accordance with GRI Universal Standards 2021 (Core Option). Furthermore, we take as areference and report according to SDGs, ISO 26.000 guidelines, UNGC & GHG Protocol.

With this report, we want to showcase our efforts to integrate sustainability throughout our company, our processes, and the services we offer. Transparency and accountability are crucial building blocks to achieving progress.

We invite stakeholders to learn more about our approach to sustainability by visiting our website at [www.nomeco.dk](http://www.nomeco.dk)

Should you require further information, please contact:  
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# CEO message

At Nomeco, our commitment to sustainability reflects the core values of our business. We recognize that the continuity and success of our business are inherently linked to our impact on the environment and society.

For this reason, embracing ESG principles is more than a strategy; it's a way to ensure long-term value for all our stakeholders. With this report, I'm proud to show you the progress we have made in 2023.

## Main achievements during 2023:

EcoVadis platinum rating achieved

- New partnerships for waste management and packaging
- Strong Code of Conduct in place
- Anti-corruption due diligence and training
- Comprehensive Business Partner Due Diligence system
- Good economic performance
- Strategic alignment with mother company PHOENIX group

We have seen a big transition related to sustainability driven by our group, PHOENIX, and the integration of CSRD. In this sense, we have all taken part in the double materiality process and data collection for CSRD, further analyzing our value chain, impacts, risks, opportunities and overall sustainability data.

We are integrated in the PHOENIX group sustainability strategy, with clear goals and targets. At Nomeco, we are pleased to ensure complete compliance and alignment with PHOENIX strategy while expanding on sustainability opportunities specific to us.

The biggest work ahead is to ensure we systematically calculate all our sustainability data accurately and consistently, to monitor and improve our performance.

**Henrik Kaastrup**  
CEO Nomeco



# Highlights and achievements

## Certifications & awards

- EcoVadis platinum
- ISO9001
- GDP, GMP

## Good news & developments

- EcoVadis platinum rating achieved (80/100)
- Climate target set: CO2 neutral in 2030 in scope 1 & 2
- 89% recycling rate
- Signed Power Purchase Agreement (PPA) to have total electricity usage covered by Danish wind energy
- First disclosure with Carbon Disclosure Project, CDP
- New partnerships with two of Europe's leading recycling and sustainable packaging companies
- New partnership for our canteen solutions, promoting healthier and more sustainable meals





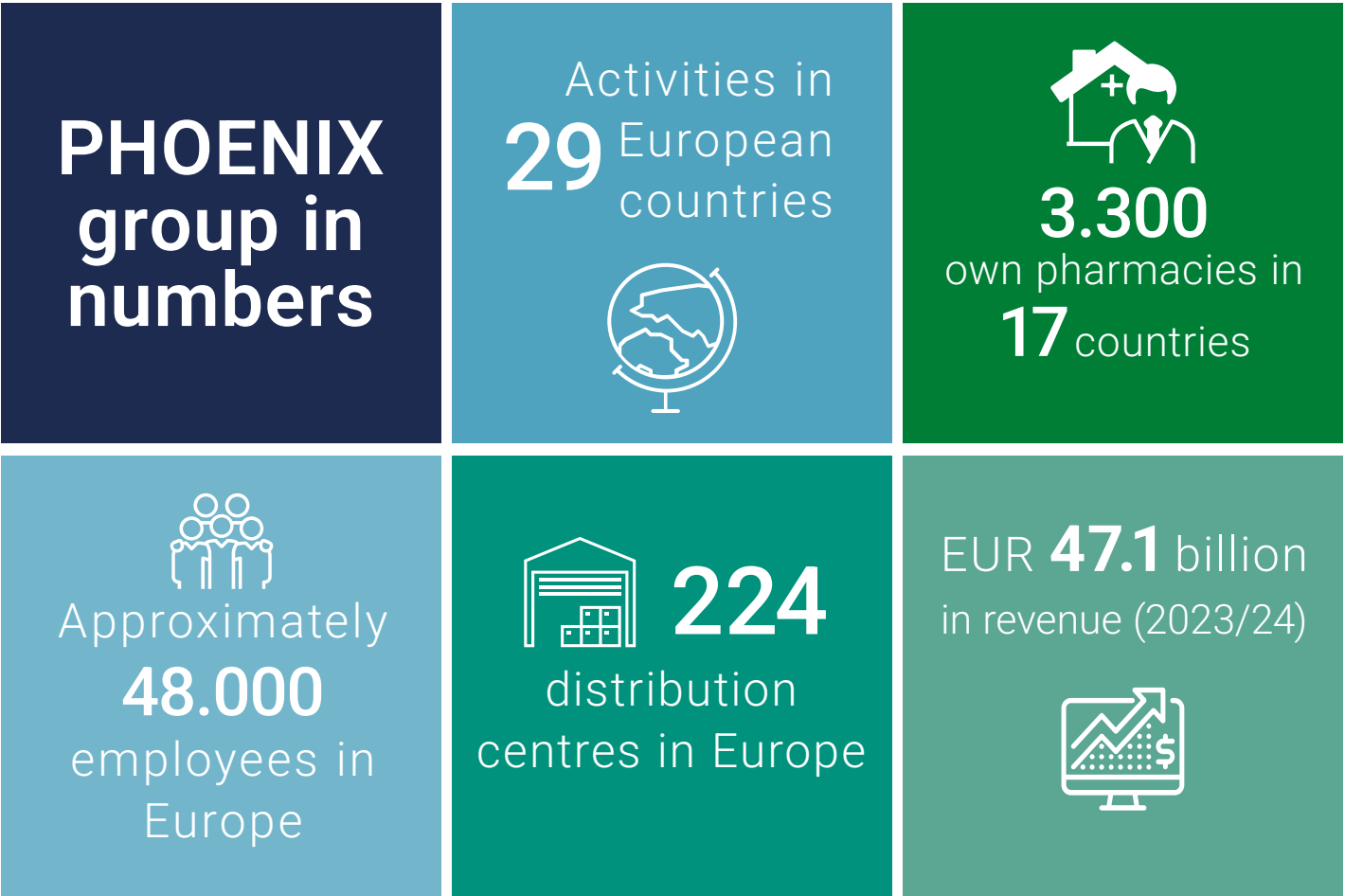
# About the company

Despite being a Danish company founded in Copenhagen, still headquartered in Copenhagen, and with locations across Danish, we are part of something larger.

We are part of the family-owned German company PHOENIX group, which is represented in 29 European countries. This makes them the leading pharmaceutical wholesaler service partner in pharmaceutical distribution in Europe.

As a result, we have an international sparring partner, and we have close cooperation with both PHOENIX group and other companies across Europe that are part of the ‘group’. We inspire each other, and we collaborate across departments to gain broader insights into optimising our businesses, services, and logistical setup.

Being part of a larger ‘family’ that extends beyond our own national borders means that we can gather a wealth of knowledge and experience. As a unified European team, we can create long-lasting services that provide value for our customers and clients.



# Products & services



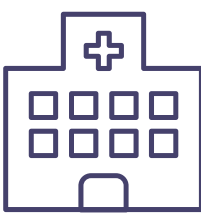
## Denmark’s biggest pharma wholesaler

Nomeco operates three distribution centers in Copenhagen, Odense and Aarhus. They serve as logistical hubs for the supply of pharmaceuticals to pharmacies across Denmark and the Faroe Islands. Our distribution network is characterized by its efficient geographic placement, ensuring that all pharmacies can be accessed within a mere two-hour timeframe.



## Nomeco HealthCare Logistics

Nomeco HealthCare Logistics provides essential healthcare logistics services, emphasizing expertise and quality across various areas. Our offerings include pre-wholesale, hospital service, clinical trial supply management, business intelligence, pharmaceutical sampling, and marketing material distribution.



## We deliver the medicine for hospitals

Our hospital service is a committed partner for the Hospital Pharmacies. We make sure that medicines of the highest quality is delivered in the safest and fastest way possible.

# Sustainability approach

Our focus on a future-proof business is a central and integrated part of Nomeco as a whole. We continuously work to learn and implement long-lasting initiatives across the organisation - and we constantly implement new workflows that benefit society and our stakeholders. Now and in the future.

But we are not working alone. For instance, we are collaborating with our various suppliers to create framework agreements that make our workflows and processes more sustainable.

At the same time, we are part of an international group, PHOENIX group, which is the largest European pharmaceutical wholesaler and service partner. PHOENIX group also works purposefully with sustainability, and we prioritise collaboration across countries so that the goal of contributing to a future-proof supply chain extends beyond our national borders.

## **CO2 neutral**

We aim to be carbon-neutral in our own operations (Scope 1+2) by 2030, meaning that we will reduce our greenhouse gas emissions by 42% by 2030, compared to our base year 2021/22.

## **Procurement with care**

We want to source all our products and materials as sustainably as possible by 2030, based on a range of KPIs. This means that we not only consider price, but also other sustainability factors.

## **Common health and diversity**

We want to take responsibility for our employees' mental and physical health. And we want everyone who has the will and talent to have the opportunity to develop in our company - regardless of gender and professional and ethnic background.





# Focus areas



## ENERGY & DISTRIBUTION

We strengthen our efforts with strong data that increases transparency and contributes to a reduced climate footprint.

- Green energy: We invest in renewable energy sources to minimise our dependence on fossil fuels.
- CO2 reduction: We map our CO2 emissions to find the most efficient ways to reduce them in both our operations and distribution.
- Efficient logistics: We implement smarter routes and technologies to ensure faster and more environmentally friendly delivery of our products.



## RESOURCES & PROCUREMENT

We are committed to reducing our environmental impact by increasing the use of recyclable materials and optimising our resource consumption throughout the value chain.

- Packaging and materials: We continuously test new packaging solutions with a focus on reducing the amount of materials and increasing recyclability. The goal is to promote a circular economy where resources are utilised in the best possible way and waste is minimised.
- Waste reduction and recycling: We prioritise initiatives that reduce waste and increase recycling. Through efficient material handling and continuous optimisation, we work to reduce our total amount of waste.
- Sustainable procurement: We engage in responsible procurement practices by choosing suppliers who share our values of environmental protection and high social and ethical standards.



## STAKEHOLDERS & PEOPLE

People are at the centre of everything we do. We are committed to inclusion and diversity because it is the foundation for well-being, commitment and motivation - both among our own employees and in our cooperation with our suppliers.

- Responsibility throughout the value chain: We set clear requirements for sustainability and responsibility in our supply chain. This ensures that our values live on throughout the supply chain.
- More women in management: We are actively working to get more women in management positions. It is important for us to create a leadership culture that is both balanced and representative.
- Talented and engaged employees: We attract and develop talented and engaged employees who share our vision of an inclusive and sustainable future.

# Stakeholder engagement & governance

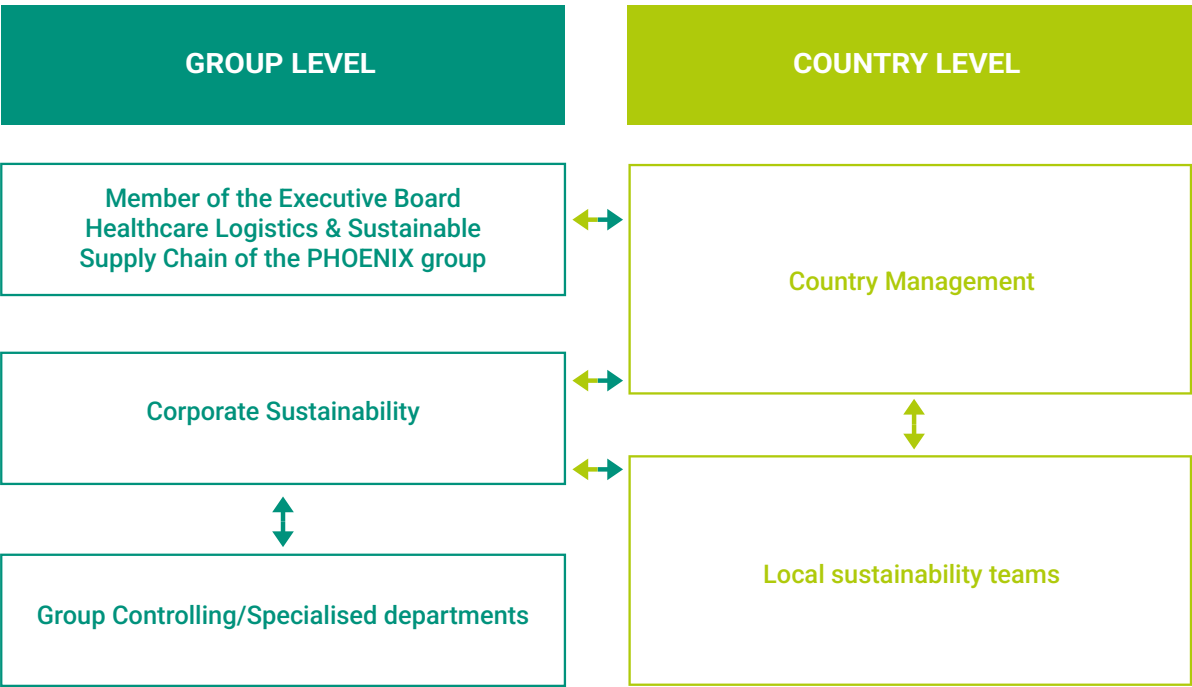
The PHOENIX group’s sustainability framework is designed to assist its subsidiaries in implementing the group’s sustainability management system.

The framework outlines the responsibilities, roles, and tasks necessary for effective execution. It also provides a comprehensive overview of the company’s activities related to the sustainability agenda, including guidelines, reporting, and stakeholder engagement.

To ensure relevance and effectiveness, we regularly conduct a (double) materiality analysis in line with the Global Reporting Initiative (GRI) Standards. As a result, the materiality matrix is updated to reflect changes.

The topics were evaluated based on their significance to stakeholders and their economic, environmental, and social impacts on our business operations. See our material topics on the next page.

## Sustainability organisation





# List of material topics

MATERIAL TOPICS	GRI TOPICS	LOCATION OF THE IMPACTS
Responsible and ethical supply chain	Procurement Practices	External
Product safety	Customer Health and Safety, Marketing and Labelling	Internal and external
Access to high-quality pharmaceuticals and healthcare	Indirect Economic Impacts	External
Responsible production of own brands	Customer Health and Safety	Internal and external
Customer satisfaction	Customer Health and Safety, Marketing and Labelling, Customer Privacy	Internal and external
Resource consumption	Energy	Internal and external
Emissions and climate impacts	Energy, Emissions	Internal and external
Energy use	Energy	Internal and external
Waste management	Waste	Internal and external
Employee health, safety and well-being	Occupational Health and Safety	Internal
Diversity, equity, and inclusion	Employment, Diversity and Equal Opportunity, Non-Discrimination	Internal
Long-term talent retention	Employment, Diversity and Equal Opportunity, Training and Education	Internal
Staff development	Training and Education	Internal
Fair working conditions	Employment, Non-Discrimination, Diversity and Equal Opportunity	Internal
Community engagement	Indirect Economic Impacts	External
Compliance	Anti-Corruption, Anti-Competitive Behaviour	Internal and external

# Sustainability strategy 2023

CLUSTER	SHORT LIST MATERIAL TOPIC	NOMECO POLICY & PROCEDURES	TARGETS	SDGS ALIGNMENT	UNGC
ENVIRONMENT	Energy consumption & GHG	Environmental policy	Reduce energy consumption by 10%. - 1.2% scope 1 & 2 from 2021	SDG 7	Principle 6-9
	Materials, chemicals & waste	Environmental policy	Zero waste to landfill	SDG 7	Principle 6-9
	Customer health & safety	Environmental policy		SDG 7	Principle 6-9
	Environment services & advocacy	Environmental policy		SDG 12	Principle 6-9
SOCIAL	Employee health & safety	HR Handbook	0 incidents & accidents	SDG 3	Principle 3-6
	Working conditions	HR Handbook	100% health coverage conditions	SDG 3	Principle 3-6
	Social dialogue	HR Handbook		SDG 3	Principle 3-6
	Career management & training	HR Handbook	100% employees trained	SDG 3	Principle 3-6
	Diversity, equity & inclusion	HR Handbook	40% women	SDG 3	Principle 3-6
ETHICS	Corruption	Code of Conduct	0 corruption cases	SDG 12, 8	Principle 10
	Sustainable information management	Code of Conduct	0 breaches ITC	SDG 12, 8	Principle 10
SUSTAINABLE PROCUREMENT	Supplier environmental practices Supplier social practices	Sustainable procurement policy	100% target suppliers to have signed code of conduct	SDG 12, 8	Principle 1-2



# Sustainability strategy 2023

We have screened UN’s Sustainable Development Goals and the 169 sub-goals. We have selected four overall goals and a range of sub-goals, each of which has a significant impact on our environmental footprint. These are the goals that we will focus on in the coming years.

**SUSTAINABLE DEVELOPMENT GOAL 3**

- Good health and well-being

We have a social responsibility to ensure that Danes can receive the medicine they need, and we support and strengthen our employees through an increased focus on well-being.

**SUSTAINABLE DEVELOPMENT GOAL 7**

- Sustainable energy

We want to play an active part in the future climate-friendly business community. We take responsibility for our emissions by trying to reduce them and by looking for new solutions that can improve our energy intensity.

**SUSTAINABLE DEVELOPMENT GOAL 8**

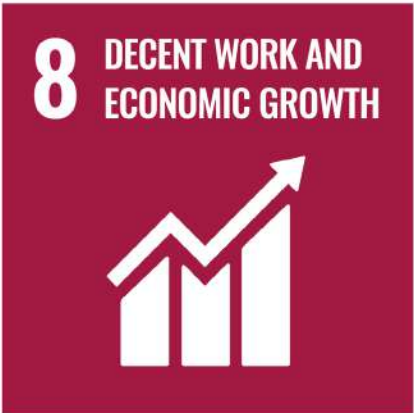
- Decent work and economic growth

We seek economic growth and technological development with respect for sustainable development and our employees’ diversity. We actively support equality and a safe and non-discriminatory work environment.

**SUSTAINABLE DEVELOPMENT GOAL 12**

- Responsible consumption and production

We will promote future-proof solutions through our procurement and resource consumption and stimulate the reuse of waste in all parts of our business.



# Memberships, endorsements & certifications

## 2023 Memberships & endorsements to sustainability organisations



## 2023 Certifications & Assessments



EcoVadis platinum Nomeco: 80/100



ESG\_EHS audit



# Environment






# Environment


We continuously expand our efforts to minimize environmental impact and promote sustainable development. We have agoal to become carbon neutral in our own operations (Scope 1+2) by 2030.

As part of the PHOENIX group, this means re-  
ducing our greenhouse gas emissions by 42%  
by 2030, based on our base year 2021/22. Here  
are some of the initiatives we have undertaken  
at Nomeco.


## FACTS AND FIGURES




**Waste:**  
Around **89%** of our waste  
is **recycled or reused**.




**Renewable energy:**  
We use **100% Danish wind  
energy** in all our sites  
through Power Purchase  
Agreements.



**CO2 emissions:** We  
**closely** monitor the fuel  
consumption of our  
delivery vehicles and **our  
CO<sub>2</sub> emissions**.



**Distribution:**  
Our transports are carried  
out by lorry and vans  
instead of planes.



**Targets:** We have annual targets  
for **reducing energy** consumption,  
including **energy efficiency** and  
switching to  
other technologies.



# Energy consumption & greenhouse gas

## Energy or carbon audit

In compliance with Danish Statutory Order (Lovbekendtgørelse) no. 1149 / 2019, Nomeco undertook a comprehensive third-party energy audit of all three sites (København, Århus and Odense) in 2020 and again an audit of the newly constructed site in Køge in 2022.

The audits were conducted in accordance with the DS16.247/1-4 standard, which ensures a systematic and standardized approach to evaluating energy consumption and identifying opportunities for improving energy efficiency.

The audits involved a thorough analysis of Nomeco’s energy usage across all relevant operations, assessing areas such as heating, ventilation, lighting, and process-specific energy consumption. The goal was to identify measures that could optimize energy performance, reduce energy waste, and support the company's sustainability and cost-efficiency targets.

## Purchase or generation of renewable energy

As part of our environmental strategy, Nomeco has a Power Purchase Agreement (PPA) in addition to our existing energy agreement. This supports the transition towards a cleaner energy mix, ensuring that the electricity we use is sourced from certified renewable resources.

Moreover, we are contributing to the demand for renewable energy. The certificate comes with guarantees of origin, ensuring that our consumption is directly linked to renewable energy production, allowing us to further reduce our carbon footprint.

We are committed to continuing these efforts, potentially enabling our company to claim carbon neutrality for the electricity we consume, in line with internationally recognized sustainability frameworks such as EcoVadis.

By taking this step, Nomeco aims to promote environmentally friendly energy production while taking the broader environmental impact into account.

## Actions or training to raise employee awareness on energy conservation/climate actions

All our employees are to be aware of our targets and have knowledge regarding our procedures and management relating to targets in this policy.

This is to ensure that we comply with own standards and continuously work towards our goals. Nomeco together strives to continually improve our environmental performance by embedding sustainability into our everyday.

We actively engage employees at all levels to assume responsibility for – and participate in – environmental activities.

# Energy consumption & greenhouse gas

## Reduction of energy consumption of lighting systems

In 2023, we planned and budgeted an upgrade to the lighting system at one of our sites to energy-efficient LED lighting. Next year, we have allocated budget and resources to implement the same LED lighting upgrade at our much larger Copenhagen headquarter site. This phased approach ensures a systematic transition to more sustainable lighting solutions across our facilities.

Reduction of energy consumption of HVAC (heating, ventilation, and air conditioning) systems

Nomeco is committed to reducing energy consumption and improving efficiency in line with the UN Sustainable Development Goal 7: Affordable and Clean Energy. We focus on operational improvements and fostering energy-conscious behavior among employees by sharing information on energy use through our intranet.

For example, we highlight the environmental impact of digital tools, such as AI, to encourage mindful energy use. Internal campaigns also promote energy-savings like turning off lights and using natural ventilation.

## Reduction of carbon emissions in logistics or optimization of fleet efficiency

This year, we are renewing our focus on optimizing transport routes to enhance efficiency and reduce fuel consumption and CO2 emissions in our wholesale operations.

While we continuously work on this, we are now leveraging advanced route planning technologies and data analytics to further minimize travel distances and idle times, ensuring our deliveries are as eco-friendly as possible.

In our pre-wholesale operations, we continuously analyze and optimize routes to maximize efficiency for the trucks. These efforts are integral to our broader strategy of improving operational sustainability and reducing our environmental impact across our logistics.

## Optimization of our fleet

As part of our strategy to reduce carbon emissions and optimize fleet efficiency, we are committed to upgrading our fleet and continuously monitoring developments in the transport sector to identify better solutions. We plan to continue testing other electric and alternative fuel solutions for our vans to ensure we adopt the most effective technologies.

In our pre-wholesale operations, we offer HVO diesel to our suppliers as a more sustainable fuel option. Additionally, we are closely following trends in the electric truck market to explore further opportunities for reducing our carbon footprint. Our ongoing efforts reflect our dedication to sustainability and innovation in logistics.

# Materials, chemicals & waste

## Reduction of material consumption through process optimization

Through collaboration with a packaging partner, we have significantly minimized our use of cardboard and plastic. This optimization reduces the number of materials we need to purchase while streamlining procurement, transportation, and on-site handling processes.

We have also improved the management of temperature loggers, which were previously discarded after one use. Now, we collect them in a designated area, and once we reach a certain quantity, a supplier retrieves them for proper disposal. This change has optimized our handling process and reduced waste.

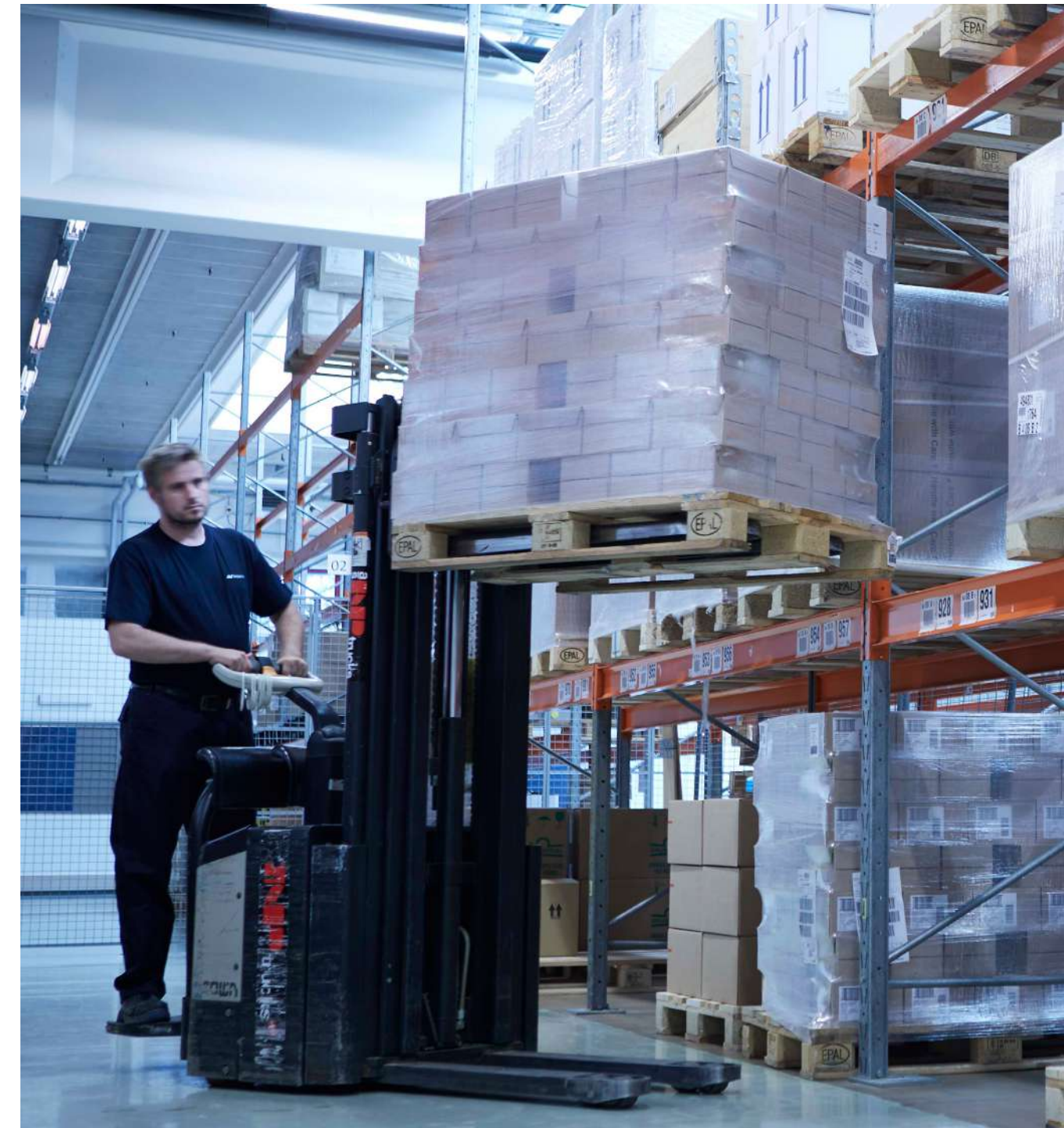
Furthermore, our procurement process has been digitized. This has enhanced efficiency and reduced paper consumption. These initiatives collectively contribute to our goal of minimizing material usage and promoting sustainability.

## Use of eco-friendly or bio-based input materials

We utilize ammonia (NH<sub>3</sub>) as the primary refrigerant in our large refrigeration plants at our main sites in Copenhagen and Køge. This decision was driven by our commitment to using greener refrigerants and was partly influenced by customer requests.

In Copenhagen, we have been using ammonia for at least 10 years, while our large site in Køge has used it since its construction in 2019.

Currently, our cleaning service providers are undergoing an assessment to review the cleaning agents they use. General Procurement has requested a comprehensive list of these agents to ensure they meet safety and environmental standards.







# Materials, chemicals & waste

## Environmental emergency measures in place

We have a Health & safety emergency plan which describes what to do in case of fire in different locations of our sites, internal environmental accidents, personal injuries, ammonia leakage, external accidents and catastrophes, bomb threats, threats against medical products, damage to buildings incl. water damage, storm damage, failure of electricity, heating, cooling, and IT.

At our Køge site, we have installed lightning protection on the roof due to its location in a large, open field. Additionally, we have conducted a comprehensive assessment of the likelihood of environmental emergencies affecting the company. The evaluation concluded that, given the geographical distribution of our four sites, there is no significant risk of emergencies such as flooding.

## Actions for labeling, storing, handling and transporting hazardous substances

To ensure the proper labeling, storing, handling, and transporting of hazardous substances, we have different procedures explained within our Quality Management System (QMS).

This guide provides detailed, step-by-step instructions, complete with definitions, pictures, and links to the appropriate systems and data platforms.

By following these procedures, employees and drivers can confidently manage hazardous substances in compliance with relevant regulations and safety standards. In the warehouse, all narcotics are stored in a separate room, where you need specific access permit.

## Training employees to safely handle and manage hazardous substances

Before handling dangerous and hazardous goods, employees and especially drivers are trained according to regulations. The dangerous goods manager ensures that training is up-to-date, relevant, and compliant with dangerous goods rules.

Dangerous goods courses are held quarterly, and employees must be registered via the HR portal. If many employees from one site are enrolled, an internal course can be arranged.

Upon course completion, participants receive a certificate valid for two years, which is filed in their training records. Details about handling dangerous goods, and what to do in case of accidents with hazardous materials, are explained in Nomeco's QMS system.

# Materials, chemicals & waste

## Reduction of internal wastes through material reuse, recovery or repurpose

At Nomeco, reducing internal waste is central to our sustainability efforts, following the 3 R's: reduce, reuse, recycle. We have implemented best practices to optimize material reuse, recovery, and repurposing, supported by structured training for employees. Each team member plays a key role in ensuring proper waste sorting, compaction, and disposal.

Partnering with a waste management supplier, we focus on minimizing resource use, seeking alternative ways to repurpose materials within or outside Nomeco, and ensuring that unusable items are properly recycled, contributing to our climate goals.

## Internal sorting & disposal of waste according to waste streams

We have implemented a holistic waste management approach that integrates strategic actions to minimize waste generation and maximize resource efficiency. With centralized sorting stations, we promote responsible waste disposal. Also in the canteens, employees are guided to dispose of different types of waste. These practices are complemented by a broader waste reduction strategy, focusing on optimizing processes to minimize resource use. Nomeco actively seeks to lower waste volumes, reduce resource wastage, and ensure that materials are either reused or repurposed, aligning with our climate-related KPIs. We are committed to regularly evaluating our processes to identify further opportunities for waste reduction and collaborate with key partners to implement sustainable solutions.

## Actions or training to raise employee awareness on waste reduction & sorting

Through infographics, written information and workshops, our waste management partner helps us enhance employee awareness on waste reduction and sorting.

The workshops have been conducted on all sites and analyze our internal waste data, providing insights into recycling rates and identifying areas for improvement. Employees have engaged in presentations about waste sorting practices and had the opportunity to ask questions, which were taken forward to further support our waste handling.

The training sessions also clarified what happens to the waste materials and how they are recycled, empowering staff to implement more effective waste management strategies in their daily routines.





# Materials, chemicals & waste

## External partnerships or collection programs established to reuse and recycle major waste streams

We collaborate with a waste management partner to reduce internal waste through material reuse, recovery, and repurposing. Our partner provides comprehensive waste renovation and management services, helping us establish optimized waste sorting processes and recover valuable materials like metals, plastics, and paper.

Their consulting services guide us in identifying reuse opportunities, such as repurposing packaging and production by-products. Additionally, we receive analyses and reports that provide insights into our waste patterns, enabling data-driven improvements. Through employee training and en-

gagement, we foster a culture of waste reduction, contributing to a circular economy and meeting our sustainability goals.

We have sustainable procurement policies in place to procure materials and products that are environmentally friendly and have minimal packaging. This helps us reduce waste at the source.

For example, our partnership in packaging solutions, and our project Returpen project which is a circular initiative to reduce waste.

We report on our waste management in the annual Phoenix sustainability report, as well as in EcoVadis.





# Environmental services & advocacy

**Company specific recycle or reuse programs and promotion campaign**

Returpen is a specific example of a recycling and reuse campaign that Nomeco is part of. Likewise, Nomeco is actively advancing company-specific recycling and reuse programs through innovative initiatives like the circular approach to temperature loggers used in medicine transport. Collaborating with our supplier, Nomeco has shifted from discarding single-use loggers to utilizing renewed loggers that maintain the same precision and quality. This sustainable practice is further enhanced by a take-back program, where used loggers are collected and reused by the supplier.

Our waste recycling approach emphasizes that discarded items can still be valuable. Partnering with a waste management company, we enhance our resource responsibility. This collaboration aligns with our vision for a cir-

cular economy, transforming waste into valuable resources. A green profile was a key factor in our choice of partner.

**Clear information channels for customers on take back and recycling services**

The Returpen initiative is an example of effective collaboration on take back and recycling. Launched on 1 December 2020, it allows customers to return used injection pens at pharmacies. Nomeco is a key logistics partner in this initiative, who manages the collection of Returpen from pharmacies after customers have returned them.

Nomeco ensures the seamless transport and processing of these materials, contributing to the green transition by facilitating the recycling of valuable materials like glass and plastic. A website is dedicated to this initiative and Nomeco is showcased as a co-initiator and partner: <https://www.returpen.dk/>

**Company specific measures to offer HVO as an alternative fuel**

In collaboration with our subcontractors, Nomeco currently offers fossil-free transport by using HVO (Hydrotreated Vegetable Oil). HVO is fossil-free and can reduce CO2 emissions by up to 90%. All trucks in use are compatible with HVO, allowing it to be used either as an alternative to or in combination with regular diesel. This service provides our customers with an option that significantly reduces the environmental impact associated with transportation.



# Environmental services & advocacy

**Company specific measures to inform customers on the environmental issues of the products**

To inform customers about the environmental impact of our products, we disclose comprehensive information through the Carbon Disclosure Project, CDP, covering climate change, water, waste, and plastic details. We prioritize transparency by sharing updates on LinkedIn and our website, alongside our environmental policy, which outlines our goals and methods. This allows our customers to be well-informed about recycling, energy consumption, and targets.

One way we inform customers about environmental issues is through our response to suppliers, in the pre-wholesale sector, participating in a tender. This tender includes questions about the sustainability of last-mile transportation, which Nomeco manages. In our response, Nomeco provided detailed information on vehicle Euro standards, energy usage, and goals for green transport.

**Provision of services for reducing paper/carton consumption**

Over the past few years, some departments, e.g. legal and procurement, have already transitioned from manual paper and scan signing to digital signatures, while other departments are still in preparation. This is partly because the pharmaceutical industry is under severe scrutiny in terms of quality assurance. We have made an analysis of the potential savings in time, paper, and CO2 for transitioning to digital signing. The majority of orders and billing in the wholesale department (pharmacies and hospitals) is done digitally, just as the sales/billing in the pre-wholesale (pharma companies) is mostly digitalized.

**Provision of eco-friendly packaging materials**

Two of our sites do not have canteens and will now start receiving food in biodegradable packaging. Previously, there was no food plan in place, so this is a new initiative rather than a switch from plastic packaging. Additionally, we have projects that reduce the use of cardboard, utilize thinner labels, and minimize plastic usage by opting for thinner plastic materials. For transporting medicine, we use durable plastic boxes that are reused multiple times, potentially thousands of times, to further reduce our environmental impact.





# Sustainable procurement





# Sustainable procurement

## Supplier code of conduct in place

We have a comprehensive Supplier Code of Conduct in place that addresses several critical areas to ensure responsible and ethical business practices. The code includes stringent Ethical Standards to promote integrity and fairness in all supplier interactions.

It mandates adherence to Health & Safety regulations to protect the well-being of all employees and stakeholders. Our code also encompasses Anti-Corruption and Competition Compliance to prevent unethical practices and ensure fair competition.

Environmental responsibility is a key focus, with specific guidelines on environmental sustainability. We emphasize the importance of Business Partner Dialogue to foster transparent and collaborative relationships. Data protection measures are outlined to safeguard sensitive information.

Finally, we require all suppliers to demonstrate compliance with the Supplier Code of Conduct, ensuring that these standards are consistently met and upheld.

## CSR risk analysis (i.e. prior to supplier assessments or audits)

At Nomeco, all suppliers undergo a thorough CSR risk assessment via the Phoenix Business Partner Due Diligence online platform before entering into any agreement. This process ensures we evaluate potential risks related to sustainability and compliance. For suppliers above a purchasing threshold of EUR 1,000, screening is mandatory, allowing us to identify any CSR risks prior to business engagement.

Our top 50 suppliers are also assessed using this tool, ensuring robust risk control measures. Detailed instructions on the screening system are provided to guide users in managing risk evaluations effectively. In the process, we fill in the supplier evaluation which contains questions on sustainability.

## Supplier assessment on environmental or social practices

Suppliers categorized as strategic or high-risk, based on our Business Partner Due Diligence screening tool, must complete a detailed self-assessment questionnaire. This evaluates their environmental and social

practices, helping us identify and mitigate CSR risks effectively, ensuring compliance with our sustainability standards and risk management policies.

## Social or environmental clauses integrated into supplier contracts

We have integrated social and environmental clauses into supplier contracts through the Nomeco Supplier Code of Conduct 2023, which is aligned with the PHOENIX group General Procurement Supplier Code of Conduct.

This code sets out minimal standards for suppliers, covering key areas such as Ethical Standards, Health & Safety, Anti-Corruption and Competition Compliance, Environmental Responsibility, Business Partner Dialogue, and Data Protection.

Suppliers are required to comply with these standards and applicable national legislation, ensuring ethical practices, safe working conditions, environmental sustainability, and data protection.

Compliance with this code is mandatory, and suppliers must confirm their adherence to these principles as part of the supplier evaluation and selection process.

# Sustainable procurement

## Capacity building of suppliers on environmental or social issues (e.g. corrective actions, training)

Although Nomeco does not have capacity building for suppliers as such, we do have partnerships with some suppliers e.g. on packaging materials, where we have established KPIs related to sustainability, which are assessed and renewed yearly. This collaboration aims to enhance our joint sustainability efforts. Finally, we get many requests from clients who want to have meetings and relationship building between their own and Nomeco's sustainability teams and specifically ask for our ideas for shared initiatives.

The selection process in our tenders entails inviting potential suppliers to submit their bids. Relevant criteria are defined by the participating departments, and the winning bid should be chosen based on the highest overall score. Sustainability is a criteria, and suppliers are rated thereafter. In instances where sustainability is a critical factor, it can be mutually agreed that this criterion will be given substantial weight in the evaluation process.

## Training of buyers on social and environmental issues within the supply chain

We provide comprehensive training for our buyers on social and environmental issues within the supply chain. In May 2024, we conducted a web-based virtual training session to educate our buyers on these critical topics. Following the training, all participants received relevant materials to reinforce their learning.

Additionally, a recording of the session was made available for future reference, ensuring that the information remains accessible and that our buyers are well-equipped to address social and environmental challenges in the supply chain.





# Labor & human rights





# Labor & human rights

## Our commitment

At Nomeco, we are deeply committed to fostering a workplace that prioritizes the health, safety, and well-being of our employees. Our comprehensive approach to labor and human rights is rooted in proactive risk assessments, continuous training, and open communication, ensuring a safe and supportive environment for all.

## Health & safety excellence

We conduct regular health and safety risk assessments, including safety walks, to identify and mitigate potential workplace hazards. Our adherence to Danish legislation and the Work Environment Act ensures that our practices meet the highest standards. Nomeco's Work

Environment Organization (AMO) plays a pivotal role in maintaining safety protocols, reporting incidents, and implementing preventive measures to reduce work-related accidents and illnesses.

## Emergency preparedness

Our tailored emergency action plans guide employees through various crisis scenarios, ensuring clarity in roles and responsibilities. This preparedness is complemented by a robust complaints procedure, allowing employees to report incidents and concerns through direct channels or anonymously via our whistleblower system.







# Labor & human rights

## Empowering through training

Nomeco invests in mandatory and supplementary training programs for our Work Environment Organization (AMO) members, equipping them with the knowledge and skills necessary to uphold workplace safety. This commitment extends to all employees, who are encouraged to engage in ongoing education to enhance their health and safety roles.

## Promoting well-being and ergonomics

We prioritize ergonomic optimization to prevent repetitive strain injuries and enhance comfort. Proper lifting techniques for warehouse workers and height-adjustable desks are integral to our strategy, alongside initiatives to address stress and psychological well-being. Regular 1-1 talks and yearly development meetings foster a culture of engagement and mental health support.

## Inclusive and family-friendly policies

Nomeco offers a range of family-friendly programs such as parental leave and flexible work arrangements. Our commitment to diversity is reflected in our recruitment

practices and infrastructure adaptations for employees with disabilities.

## Transparent communication and employee voice

We maintain a two-way communication system, enabling employees to voice their opinions on working conditions and professional development. Regular employee satisfaction surveys and collective agreements ensure that our workforce remains engaged and supported.

## Commitment to continuous improvement

Through structured career management, training, and development opportunities, Nomeco empowers employees to advance their careers and achieve professional goals. Our transparent recruitment process and internal job postings promote career mobility and growth. At Nomeco, we believe that a positive and inclusive work environment is the foundation for innovation and success. Our dedication to labor and human rights is unwavering, as we strive to create a workplace where every employee feels valued, respected, and empowered.



# Ethics







# Anti-corruption

## Awareness training performed to prevent corruption and bribery

To prevent corruption and bribery, we conduct comprehensive awareness training for all administrative employees. New hires are automatically enrolled in this and must complete the training within a certain deadline, and existing employees receive training every two years.

Each month, we also assess whether any new employees qualify as key personnel. If they do, they receive specialized compliance training as part of their onboarding. Furthermore, all key personnel participate in annual in-person training sessions. These face-to-face meetings provide a detailed explanation of their responsibilities and tasks, ensuring they are well-equipped to uphold our anti-corruption and bribery standards.

## Anti-corruption due diligence program on third parties in place

As a part of the PHOENIX group, Nomeco has an anti-corruption due diligence program for third parties in place. This program, known as the Business Partner Due Diligence (BPDD), is designed to identify and mitigate potential risks, including corruption, antitrust, sanctions, and anti-money laundering risks.

Compliance clauses are included in contracts, and a risk-based approach ensures that only relevant third parties undergo thorough due diligence.

## Whistleblower procedure for stakeholders to report corruption and bribery

All employees, as well as persons outside the PHOENIX group, have access to a case reporting system, which may also be used to make

anonymous reports. All employees of the PHOENIX group who acquire knowledge of (potential) infringement against applicable laws or guidelines are strongly encouraged to report this (or the suspicion of such) immediately.

Employees of the PHOENIX group are strongly encouraged to report, e.g., anonymously and where required by law, in person or telephone, indications of or concerns about (possible) infringements against the guidelines (see below) to the following persons:

- a) Their direct superiors;
- b) The competent Local Compliance Manager or Corporate Compliance; or
- c) Via the PHOENIX group's case reporting system (<https://phoenixgroup.integrityplatform.org/>).

# Anti-corruption

**Audits of control procedures (e.g. accounting, purchasing etc.) to prevent corruption and bribery**

In addition to the mandatory annual external audit, Nomeco undergoes an internal audit approximately every three years, performed by our mother company PHOENIX group.

These audits comprehensively review our internal control procedures in key areas such as accounting and purchasing to ensure they are effective in preventing corruption and bribery. This dual approach of external and internal audits ensures a robust framework for mitigating risks and continuously improving our control procedures.

**Corruption risk assessments performed**

Corruption risk assessments are regularly performed. These assessments are conducted at least every two years to identify, assess, and mitigate potential compliance risks.

The process involves scenario-based risk analyses prepared by Corporate Compliance and assessed by local entities. The results are consolidated into risk matrices, and appropriate countermeasures are defined to mitigate identified risks.

**Certification of Compliance Management System (CMS)**

The PHOENIX group has had the appropriateness of its CMS externally audited with the pillars Anti-Corruption, Competition Compliance, Sanctions & Embargoes Compliance and Anti-Money Laundering according to Assurance Standard 980 of the Institute of Public Auditors in Germany (IDW PS 980).

The Appropriateness Certification was granted as of 31.01.2024. This enables us to ensure that we systematically counteract risks and have established effective processes.

**Specific approval procedure for sensitive transactions (e.g. gifts, travel)**

For sensitive transactions such as gifts and travel, we have a specific approval procedure in place to ensure compliance and ethical conduct. Additionally, Nomeco has just made a new internal platform on our Intranet where staff can register gifts. If a value limit is exceeded, the transaction is reviewed at our local compliance committee meeting, which is held quarterly.

The local compliance committee is currently made up of our CEO, the director for HR, the director for purchasing, commercial & legal, and the local compliance manager. During these meetings, all instances where limits have been surpassed are carefully examined and appropriate decisions are made.

Additionally, we conduct monthly checks to monitor any breaches of the locally established value limits. This dual-layered approach ensures that all sensitive transactions are scrutinized and managed in accordance with our compliance standards.



# Responsible information management



### Awareness training for information security

Nomeco's commitment to information security is reflected in our robust policies and practices, ensuring the protection of data and compliance with regulatory standards.

Nomeco prioritizes information security through comprehensive awareness training for all employees. New hires complete e-learning modules, with ongoing refresher courses to stay updated. Collaborating with the PHOENIX group, we enhance security practices through campaigns and include security messages in external emails.

Our training program covers cybersecurity, data protection, GDPR compliance, and secure handling of confidential data, using web-based sessions and phishing simulations.

Stakeholders can also report information security concerns anonymously through the PHOENIX group's case reporting system, selecting "Data security breach" for specific issues.

### Information security risk assessments

Nomeco conducts risk assessments aligned with ISO standards, classifying services and identifying necessary safeguards.

We ensure safe processing of sensitive data, particularly in medical devices, with ISAE3000 assurance reports for GDPR compliance.

### Audits of control procedures

Regular audits and evaluations ensure compliance with IT security policies. System owners document control tasks,

and incidents are managed through the Service Desk.

Vendor evaluations and training foster a security culture, with audits by the Danish Medicines Agency ensuring adherence to standards.

### Records retention schedule

Documentation is stored according to national laws, with specific archiving guidelines for GDP and other relevant records. Compliance is ensured through orderly storage and annual readability checks.

# Sustainability indicators





# 2023 sustainability KPIs

TOPIC & SUBTOPIC	UNIT	2023	2022	2021
ENVIRONMENT				
ENERGY CONSUMPTION				
Total consumption of district heat (MWh)	MWh	2.346	2.164	2.462
Total consumption of electricity (MWh)	MWh	7.393	7.277	7.753
Total energy consumption in MW	MWh	9.739	9.441	10.215
MWh/revenue (MWh/bDKK)	MWh	911	1.128	1.352
District heat from renewable sources	MWh	1.453	-	-
Electricity from renewable source	MWh	7.155	-	-
Total renewable energy consumption (MWh)	MWh	8.608	-	-

# 2023 sustainability KPIs

TOPIC & SUBTOPIC	UNIT	2023	2022	2021
Total Scope 1 GHG emissions (fuel-based method)	tCO2e	1.413	1.404	1.429
Total Scope 2 GHG emissions (location-based). Emission factor provided by each supplier, adheres to GHG Protocol	tCO2e	2.906	2.834	2.606
Total Scope 2 GHG emissions (market-based). Emission factor provided by each supplier, adheres to GHG Protocol	tCO2e	488	890	420
Total gross Scope 3 GHG emissions (GHG protocol)	tCO2e	3.057	1.269	1.197
Total gross Scope 3 Downstream GHG emissions (GHG protocol)	tCO2e	-	-	-
Total gross Scope 3 Upstream GHG emissions (GHG protocol)	tCO2e	3.057	1.269	1.197
Category 3: Fuel and energy-related activities not included in Scope 1 or Scope 2 (fuel-based method)	tCO2e	1.766	329	335
Category 4: Upstream transportation and distribution (fuel-based method)	tCO2e	1.177	831	862
Category 6: Business travel (spend-based method)	tCO2e	114	109	-



# 2023 sustainability KPIs

TOPIC & SUBTOPIC	UNIT	2023	2022	2021
WASTE				
Total weight of hazardous waste	kg	25.631	24.338	3457
Total weight of non-hazardous waste	kg	806.316	798.230	661.430
Organic waste	kg	21.831	20.990	19.190
Paper and cardboard waste	kg	617.519	598.150	580.180
Electronic waste	kg	2656	990	1040
Metals, scrap	kg	774	5650	2470
Wood	kg	2397	1110	7450
Plastic waste	kg	50.509	45.550	51.100
Glass waste	kg	560	12.790	-
Textile waste	kg	70	-	-
Other waste	kg	110.000	113.000	-
Total weight of waste recovered	kg	737.342	-	-
Waste management services % offices	%	100	100	100

# 2023 sustainability KPIs

TOPIC & SUBTOPICw	UNIT	2023	2022	2021
LABOUR				
Health & Safety				
Number of hours worked	Number	1.450.144	1.362.707	1.407.242
Number of days lost to work-related injuries, fatalities and ill health	Number	847	-	-
Number of work-related accidents	Number	21	-	-
Lost time injury (LTI) frequency rate for direct workforce - (total number of lost time injury events) x 1,000,000 / total hours worked company wide	Number	14,48	18,50	20,20
Lost time injury (LTI) severity rate for direct workforce - umber of days lost due to injuries) x 1,000 / total hours worked	Number	0,584	0,014	0,014
TRAINING & CAREER DEVELOPMENT				
Average hours of training provided per employee	Hours	5,2	-	-
Percentage of employees provided with skills training	%	100	100	100

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# 2023 sustainability KPIs

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TOPIC & SUBTOPIC	UNIT	2023	2022	2021
DIVERSITY & INCLUSION				
Ratio of the annual total compensation for the highest paid individual, to the average annual total compensation for all employees	%	8,06	6,18	9,47
Percentage of women employed in the whole organization	%	41	38	37
Percentage of women in top executive positions (excluding boards of directors)	%	22	22	22
Percentage of women within the organization's board	%	17	17	17
Average unadjusted gender pay gap	%	2,35	-	-
WORKING CONDITIONS				
Percentage of employees with flexible working conditions included in contract	%	75	-	-
Percentage of employees with access to health insurance	%	100	100	100
SOCIAL DIALOGUE				
Percentage of employees covered by employee representation, working councils...	%	100	100	100

# 2023 sustainability KPIs

TOPIC & SUBTOPIC	UNIT	2023	2022	2021
ETHICS				
% of the total workforce across all locations who received training (e.g. e-learning) on business ethics issue	%	100	100	100
% of all operational sites that follow information management system ISO 27001 (or other equivalent/similar standard) (please specify)	%	100	100	100
CMMI maturity rate	CMMI maturity rate	3	-	-
Number of confirmed information security incidents (official breaches into the system-Hacker)	Number	15	79	10



# 2023 sustainability KPIs

TOPIC & SUBTOPIC	UNIT	2023	2022	2021
PALM BASED OIL				
Percentage of palm and/or palm-based products traceable to plantation (We currently do not have the percentage of palm and/or palm-based products raceable to the plantation level because we are not the producers. We rely on our suppliers' certification and traceability systems.)	%	-	-	-
Percentage of certified palm and/or palm-based products out of the to- tal amount of products	%	7	-	-
Percentage of certified palm and/or palm-based products out of the number of products we know contain palm oil	%	75	-	-
Percentage of products containing both certified and non-certified palm oil out of total amount of products	%	2	-	-
Percentage of products containing both certified and non-certified palm oil out of the number of products we know contain palm oil	%	19	-	-

# 2023 sustainability KPIs

TOPIC & SUBTOPIC	UNIT	2023	2022	2021
SUSTAINABLE PROCUREMENT: Target TOP 10 by spend base				
% of all targeted suppliers who have signed the sustainable procurement charter/supplier code of conduct / have an own code of conduct which we checked	%	70% (7 out of the top 10 suppliers)	-	-
% of all targeted supplier contracts that include clauses on environmental, labor, human rights, and ethical requirements	%	40% (4 out of the top 10 suppliers)	-	-
% of total procurement spend which has gone through a CSR assessment or audit	%	100	33	-
% of all new suppliers which has gone through a CSR assessment (e.g. questionnaire)	%	100	-	-