Nomeco Sustainability Policy

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Link to related policies

Policy name	Policy content
Climate Transition Plan	Covering energy and emission efforts to achieve carbon neutrality
Code of Conduct	Covering ethics commitments, principles, and expectations for employees
Policy Statement on Human Rights	Covering respect for human rights
Anti-Corruption Guideline	Covering ethics principles and expectations
HR Handbook (internal document)	Covering employee-related principles, commitments and components
Procurement Policy (internal document)	Covering commitments and expectations from suppliers
Competition Compliance Guideline	Covering ethics principles and expectations
Supplier Code of Conduct	Covering ethics commitments, principles, and expectations for suppliers

1. Our commitment to sustainability

At Nomeco, our mission is clear: **we deliver health**. As Denmark's leading pharmaceutical wholesaler, we recognize that delivering health goes beyond logistics. It means acting responsibly toward people, society, and the environment. Sustainability is not a separate initiative; it is embedded in how we operate, make decisions, and create value for the future.

Nomeco works to ensure compliance with all relevant environmental, social, and governance requirements and regulations. We are a signatory of the UN Global Compact. We support the Sustainable Development Goals (SDGs), the United Nations' Guiding Principles on Human Rights, the International Bill of Rights and the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work and are guided by the International Bill of Rights.

As part of the PHOENIX group, Nomeco collaborates closely with the group's sustainability functions and operates in alignment with relevant group-wide sustainability policies and frameworks.

We are committed to act sustainable as part of doing business by ensuring limited resource consumption, good labour conditions, responsible sourcing, and an ongoing stakeholder dialogue. We work proactively to prevent or reduce impacts from our activities through setting ambitious goals, performing effective risk management, and by driving continuous improvement in our activities.

This policy covers our commitments across Environmental, Social, and Governance (ESG) areas, based on our materiality assessment. It applies to all Nomeco's employees, and we work to strengthen their awareness of responsible environmental behaviour while promoting high labour and environmental standards across our supply chain.

1.1 Environmental commitments

At Nomeco, we acknowledge that our business activities have an impact on the environment and climate. Our environmental commitments align with the UN Global Compact principles 7-9; and as part of the PHOENIX group, we support the group-wide Science Based Targets initiative (SBTi) commitment.

Nomeco advance environmental responsibility through:

- **Decarbonising operations** via energy efficiency, renewable electricity, and fleet electrification.

- **Reducing waste and packaging waste** and promoting low-carbon innovation across the value chain.
- **Collaboration with external partners like customers and suppliers** to identify, test and develop sustainability-related services that can reduce environmental impacts.
- **Focusing on deforestation-free sourcing** through transparency in our supply-chain, reducing non-sustainable palm oil, and support the EU Deforestation Regulation (EUDR).

More information on how Nomeco exercise our environmental responsibility is outlined in **Nomeco´s Climate Transition Plan.**

1.2 Social commitments

Respect for human and labour rights is fundamental to Nomeco, and we are committed to ensure that Nomeco operates responsibly an contributes to respect and protect human and labour rights and prevent violations. Our social commitments align with the UN Global Compact principles 1-6, the International Labour Organization (ILO) core conventions, and is aligned with human and labour rights-related legislation

The overarching Phoenix group **Policy Statement on Human Rights** sets the group-wide framework that Nomeco adheres to and defines our commitment to respect and promote internationally recognized human rights.

Nomeco strengthen social responsibility through:

- **Human rights due diligence** via risk-based assessments and supplier engagement across the value chain.
- **Good working condition** through fair wages, flexible working hours, freedom of association and social dialogue, a discrimination-free working environment supporting diversity; and by continuously focus on safe working environment supporting the physical and mental well-being of employees.
- **Training and development** like skills-building, career progression and annual development dialogues.
- **Focusing on resiliency, privacy, and data protection** throughout Nomeco by safeguarding personal and business-critical data to minimize the risk of crises and ensure we are prepared to respond if one occurs, thereby protecting both Nomeco and society from unnecessary harm.

1.3 Governance & Ethics commitments

We are committed to ethical business conduct, legal compliance, and transparent decision-making across our operations and value chain. Our governance and ethical commitments align with the UN Global Compact principle 10.

Nomeco ensures responsible business conduct through:

- **Promoting anti-corruption and legal compliance** through our Code of Conduct, Anti-Corruption Guideline, other guidelines, and trainings to prevent bribery, fraud, and unethical behaviour.
- **Setting clear expectations for ethical, social, and environmental practices** across our supply chain through our Supplier Code of Conduct and by performing risk-based business partner due diligence to ensure responsible sourcing and compliance.
- **Ensuring whistleblower and grievance mechanisms** through confidential channels for reporting misconduct and ensuring accountability, including handling of reports in a manner that protects the reporting person from retaliation or discrimination.

More information and access to our whistleblower scheme is available at We Deliver Health | Nomeco.dk and Integrity-platform.

2. Stakeholder engagement

We recognise that meaningful sustainability outcomes depend on active collaboration with our stakeholders. We encourage open and regular communication with all our stakeholders about our performance to respond effectively and sensitively to their worries and concerns. We engage with them through:

- **Transparent communication** of sustainability goals, progress, and challenges via reports and digital platforms.
- **Regular dialogue and consultation**, including surveys, meetings, and feedback mechanisms.
- **Collaboration on initiatives** that promote shared value, such as responsible sourcing or innovation partnerships.
- **Responsiveness to concerns and expectations**, integrating stakeholder input into our sustainability strategy and decision-making.
- **Screening of business partners** against sustainability and compliance requirements to ensure alignment with our ethical standards.

3. Governance, implementation and reporting

Sustainability governance at Nomeco is overseen by the CEO, who receives regular updates from the Sustainability Department through weekly touchpoints. The Sustainability Department also engages periodically with the Executive Leadership Group to ensure that key sustainability priorities are understood and considered in relevant decision-making. All employees are expected to follow internal procedures related to this Policy and to escalate any significant issues or risks. Sustainability progress is monitored through established reporting routines.

Building on our governance structure, our sustainability work is implemented by defining the right level of ESG ambitions and setting targets, driving execution through activities and adjustments of practices, and by measuring and monitoring progress. This is supported by ongoing communication and annual reporting on metrics and activities.

We disclose progress on our performance on our website and in our annual sustainability report, and we are committed to annual reporting to initiatives such as the UN Global Compact, EcoVadis, and the Carbon Disclosure Project (CDP). Our reporting is conducted in accordance with good practice for sustainability reporting.

Governance	
Version	1.1
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Approved by	Executive Leadership Group on January 28, 2026
Accountable for implementation of policy	Head of Sustainability
Scope	All Nomeco employees
Review frequency	Annually
Contact	info@nomeco.dk

Version history

Version	Date	Modified by	Summary of changes and updates
1.0	2026.01.28	LICAR (Head of Sustainability)	Initial policy
1.1	2026.11.17	AGAND (Student Assistant, Sustainability)	Updated links and references to related policies. Not approved by the Executive Leadership Group.