



# **ENVIRONMENTAL POLICY FOR SD WORX NORDIC**

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## 1 Introduction

Purpose of this document is to provide information how SD Worx Nordic supports a precautionary approach to environmental challenges and a responsible way of conducting its own business operations. Target of this policy is to define SD Worx Nordic responsibilities and objectives related to environment.

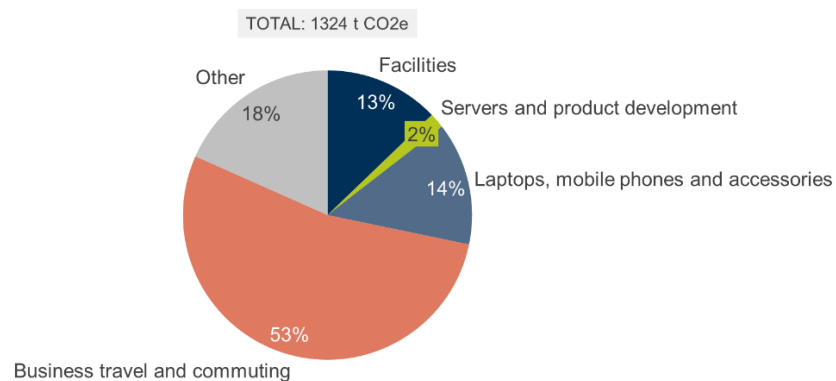
SD Worx Nordic aims to be leading and committed in environmental aspects by operating in compliance with requirements of ISO 14001 and according to our climate promise. Very often cloud service provider's main environmental impact is coming from data center emissions. SD Worx Nordic has chosen to be CO<sub>2</sub> neutral in its cloud services and have accordingly chosen our data center providers, meaning carbon neutrality or equally sufficient environmental measures and actions.

## 2 SD Worx Nordic Climate promise

We want to be a responsible HR & Payroll partner and employer now and in the future. Climate is important to all of us. We believe everybody can and should do their part. We want to be at the forefront and lead by example to drive the change of attitudes within the industry.

We know our climate impact and take action. We started our journey in 2019 by implementing the ISO 14001 environmental standard in the Nordic. 2021 we continued our work by deep diving into climate issues. We have taken a holistic approach and reviewed our entire carbon footprint, including our own emissions and emissions from our value chain (scopes 1, 2 and 3).

### SD Worx Nordic carbon footprint



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Figure 1. SD Worx Nordic Carbon footprint 2020

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The work has just started, and we are committed to take further action. We have recognized the actions to reduce our emissions and committed to follow our emission reduction roadmap to improve our climate performance. In the meanwhile, to make concrete impact from day one, we decided to compensate our emissions and aim to be carbon neutral as of 2021.

## SD Worx Nordic emission reduction pathway

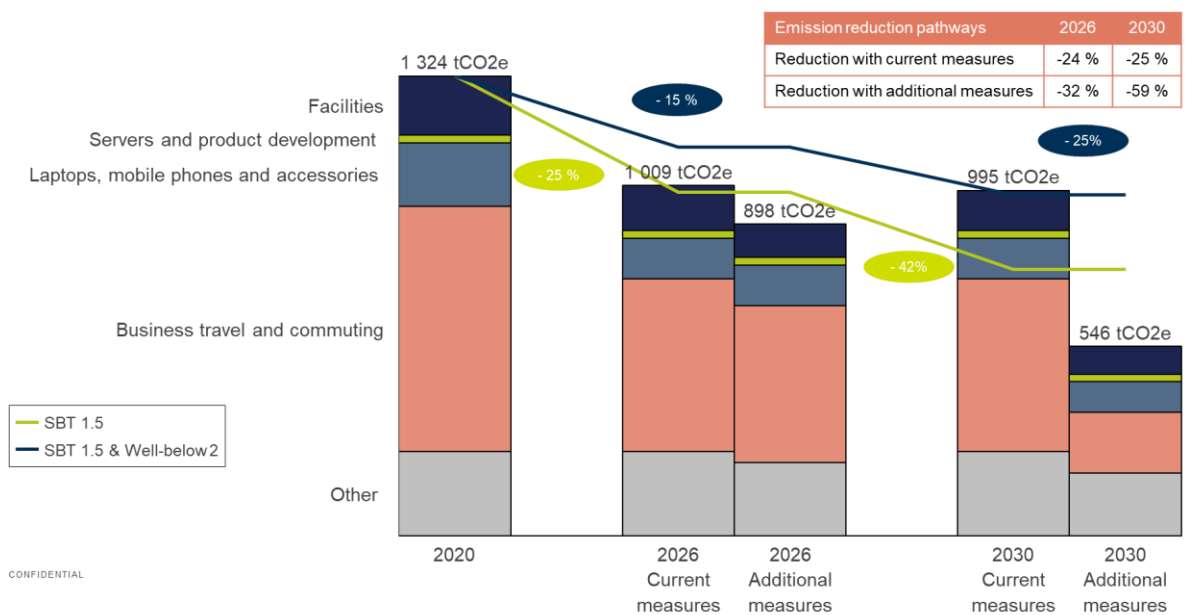


Figure 2. SD Worx Nordic emission reduction pathway

### 3 Scope

All employees and subcontractors working in SD Worx Nordic (Estonia, Finland, Norway, Sweden). To be noted that the subcontractor companies of SD Worx Nordic are out of scope, but the employees working for us are included.

Responsibility of environment is included in Nordic Supplier requirements (7.6) and is one important factor in competitive biddings. Customer requirements towards environmental impact is increasing rapidly.

### 4 Essential changes

Version	Change
1.0	Initial version
2.0	Rewritten for 14001:2015
2.1	Multiple updates and SD Worx rebranding

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## 5 Approval

Approved by	SD Worx Nordic Compliance co-ordination group
Approval date	16.6.2022
Effective date	17.6.2022

## 6 Glossary and acronyms

Term	Explanation
Subcontractor	Employee working for SD Worx Nordic as an external employee
ABMS	Active Business Management Site

## 7 SD Worx Nordic and the environment

SD Worx Nordic follows applicable legislation in each location. If any applicable legal requirement is stricter than this policy, the legal requirement will supersede.

We understand our impact to the environment via the selections of materials and consumable supplies we use and subcontractors we work with. Recognized interested parties related to environment are our current and future employees and customers, company owners and neighbours of our offices.

Our target is set our new offices into certified premises (BREEAM, LEED etc.) We give our employees sufficient tools and training for recycling, energy saving, commuting and business travelling. Nordic Environmental guidelines is for all employees as a practical guideline for environmental actions.

SD Worx Nordic recognizes its role in the worldwide need of decreasing CO2 emissions. Our aim is and has been to replace travelling with online negotiating whenever it's possible. We also support remote working which reduces the use of private cars. We also have a corporate level hybrid work model in use which enables our employees to schedule their workdays in more efficient and environmental way.

We take environment into consideration when choosing suppliers and value standards like ISO 14001.

## 8 Environmental management system

SD Worx Nordic environmental management system is integrated into our Active Business Management System, also containing quality, privacy and information security management.

For more details, please see SD Worx Nordic Quality and Compliance Management Policy

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## 8.1 Responsibilities

SD Worx Nordic ISO 14001 requirements are divided to respective parties:

- SD Worx Nordic Management Team is responsible for governance, setting objectives, and defining the direction for SD Worx environmental actions
- ISO 14001 owner is responsible for daily management of environmental management system, monitoring KPI's and carrying out actions related to environmental management
- Compliance managers are responsible for defined tasks in ABMS, such as monitoring periodic task completion, gathering data for management review, and performing KPI reporting
- Local office contacts are responsible for carrying out environmental actions, gathering data and keeping contacts with ISO 14001 owner.
- Everyone at SD Worx Nordic is responsible for following the environmental documentation and necessary actions to meet our environmental objectives.

## 9 Environmental governance objectives and climate targets

SD Worx Nordic has a fundamental obligation to commit itself to be a reliable and reputable partner in the market and continuously earn customer's trust. SD Worx Nordic's selected climate target is to be Climate neutral as of 2021 & to commit to climate roadmap (Target approved by Compliance Committee 10/2021).

### 9.1 Environmental governance objectives are

- Protect environment in all locations and operations by preventing pollution, enhancing environmental performance, and supporting sustainable development
- Fulfil compliance and legal requirements for environmental aspects in all areas of operation in each country and by each employee
- Ensure commitment to continual improvement of the environmental management system
- Act according to the recognized actions to reduce our emissions in our climate roadmap, including both actions we can do by ourselves and actions we want to achieve together with our value chain partners. We are committed to follow our roadmap to improve our climate performance.

### 9.2 Selected climate targets and actions from climate roadmap

Top level targets are Commitment to Nordic climate roadmap & Climate neutral as of 2021. An emission reduction roadmap is in place, covering all our main emission sources (business travel and commuting, our services, ICT equipment and facilities)

Actions from the roadmap:

- We prefer sustainability when selecting partners, e.g., our data centre hosting partners

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- We look for ways to optimize server capacity
- We take action to look for ways to expand the lifetime of our IT equipment
- We have a hybrid working model in use in all locations
- We review energy use and sources in our offices and look for means to move towards green energy sources
- We have an environmental guideline for business travel
- We investigate ways to nudge towards green commuting

## 10 Referenced Information

SD Worx Nordic Quality and Compliance Management Policy  
Environmental Guidelines for SD Worx Nordic