

# **ESG Charter**

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# 2 Document history

Date	Version	Created by	Description of change
19/02/2021	1.0		Original
22/02/2021	1.0		A-L proofreading

# 3 Introduction and purpose

InSites Consulting has a strong commitment towards environmental, social and governance issues (ESG issues). We believe that high ESG standards make good business sense, and that it has the potential to protect and enhance returns as well as promote the development of the communities in which it operates.

InSites Consulting shall comply with UN Global Compact's ten principles.

Further, an important aspect of maintaining high ESG standards is to respect and comply with applicable laws, regulations and internationally recognised human rights. This is a paramount requirement and expectation.

## **Environmental**

InSites Consulting seek to ensure that its business activity is environmentally responsible and energy-efficient. However, we recognise that our activities have or may have an impact on the environment. The aim is to minimize such climate impact and encourage environmental consciousness.

#### Social

InSites Consulting shall respect internationally recognised human rights and provide proper working conditions for our employees. Assessments should be made to identify health and safety risks relating to or arising from working activities, and appropriate measures shall be taken.

Equal opportunities should be granted regardless of gender, sexual orientation, age, race, colour, ethnic origin, religion, disability or trade union affiliation. We do not directly or indirectly impose any restrictions in relation to the employees' freedom to establish or join trade unions or legal strikes. And we must ensure that we do not directly or indirectly use forced labour, illegal child labour or take unjust advantage of migrant workers.

## Governance

Governance includes aspects of good corporate governance and business integrity.

InSites Consulting has also implemented an anti-corruption policy and a whistleblowing policy, which all employees and shareholders must adhere to. InSites Consulting shall ensure proper recording, reporting and review of financial and tax information.

InSites Consulting and its employees and shareholders must at all times exhibit honesty, integrity, fairness and respect in its business dealings. Further, information obtained through InSites Consulting's business must be used in the best interest of InSites Consulting, and not for personal gain by any of its employees or shareholders.

#### Implementation of the ESG policy

InSites Consulting shall conduct its activities and affairs in compliance with this ESG Charter. Any deviations, concerns etc. shall be addressed and explained in a proper manner. If it becomes clear that InSites Consulting is in material breach of the adopted ESG Charter, reasonably necessary actions must be made to rectify any such breach. We acknowledge that ESG issues are important; hence the ESG Charter will be reviewed by the board of directors of InSites Consulting at least on a yearly basis.

# 4 InSites Consulting's ESG Charter

InSites Consulting aim at all times to act with integrity and in compliance with applicable rules, regulations and policies. Integrity is a fundamental building block of trust in business relationships. InSites Consulting seeks competitive and commercial success through the application of superior individual and collective skills, and not through the use of manipulative, deceptive or illegal devices or practices.

All employees, directors, hired personnel etc. (employees) of InSites Consulting must at all times comply with the laws and regulations that apply to InSites Consulting and its employees, as well as applicable internal policies/ procedures adopted by InSites Consulting.

## Keep your promises

Conducting InSites Consulting's business activity in an ethical manner implies keeping legitimate promises, regardless of whether or not there is a legal obligation to do so. Hence, we shall only make promises we are capable of fulfilling.

#### Respect human rights

InSites Consulting is committed to protect and respect the fundamental human rights of anyone affected by its operations. InSites Consulting expects its employees, business partners and other parties directly linked to its operations, products or services to be equally committed to respect internationally recognised human rights.

### **Conflicts of interest**

Conflicts of interest may arise in the cause of doing business. All employees and shareholders will take the necessary actions to minimize the risk of conflicts of interest arising. Further, they will act in accordance with the legitimate interest of InSites Consulting, and not make decisions based on what will benefit them personally.

Employees and shareholders will not use InSites Consulting's name or business contacts or otherwise exploit their position at InSites Consulting in connection with actions that are not specific to InSites Consulting's business activities. Any questions regarding a potential conflict of interest shall be raised with their immediate superior.

#### Act in fairness

All employees and shareholders will act in a reasonable and just manner based on facts and circumstances. InSites Consulting supports fair and open competition.

#### Do no harm to InSites Consulting or our industry

All employees and shareholders will conduct the business in a responsible manner, and not engage in practices that are foreseeably damaging to the image of InSites Consulting, the industry it operates within, or its shareholder(s). In their day-to-day work, employees and shareholders will display loyalty to InSites Consulting and actively seek to conduct all business activities with integrity and honesty.

Protect InSites Consulting's real estate, assets and property

InSites Consulting's real estate, assets and property (including that which is rented or leased by the business) shall be safeguarded, and only be used for legitimate business purposes. Further, the business assets and information of confidential nature shall be respected and protected.

### Contribute to an environmentally sustainable business activity

InSites Consulting is committed to ensuring its business activity is environmentally responsible and energy-efficient, and that the environmental impacts are reduced wherever possible. InSites Consulting is continuously focusing on environmentally friendly improvements. It expects that all its employees and shareholders do the same.

## Never contribute to, or be involved in, corruption, money laundering or fraud

All employees and shareholders will work against corruption, money laundering and fraud in all its forms. Corruption is unacceptable business conduct, constitutes a threat to fair competition, and undermines legitimate business activities. Any violation within its organisation may subject both InSites Consulting and the individual(s) in question to criminal liability, and would represent a risk to the company's reputation.

Further, for the purpose of describing InSites Consulting's standards and expectations with respect to anti-corruption, InSites Consulting has implemented an anti-corruption policy, which all employees and shareholders will be familiar with and act in accordance with. The policy covers, inter alia, bribes, trading in influence, gifts, hospitality etc.

Do not purchase or in any other way make use of any sexual services. This is forbidden. The prohibition also applies to employees and shareholders when travelling in other countries on behalf of InSites Consulting.

#### Working environment

InSites Consulting shall ensure proper labour and working conditions, to safeguard its employees' health and safety, and to promote the development of the communities in which it operates.

InSites Consulting expects that all individuals that act on behalf of InSites Consulting treat everyone with courtesy and respect, regardless of race, gender, national or social origin, disability, sexual orientation, religious belief etc. InSites Consulting strives to ensure that no harassment, discrimination or bullying occurs. We believe in equal opportunities, and InSites Consulting shall be a stimulating workplace with an inclusive working environment. InSites Consulting believes that it is only then that the employees will perform at their full potential, and receive the proper recognition and reward for their performance.

# 5 Applicability of the ESG Charter

InSites Consulting must ensure that all employees and shareholders are given access to this Charter, and other relevant internal policies and procedures.

Please note that any breach of this Charter may have adverse consequences for the employee's employment and may put InSites Consulting at risk.

Any questions the employee or shareholders may have regarding this Charter will be taken up with the employee's or shareholder's manager or with InSites Consulting's CEO.

The Charter will be available on InSites Consulting's website and communicated internally and externally to all employees and shareholders, and where relevant to business partners and other parties.