

SDG – Sustainability policy

Version	Date	Evolution	Author
A	01 jun 2022	Original document	LVDS
B	29 Jul 2026	Policy update to SDG	KVD
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1. General

1.1. Language

The original version of this document is made in Dutch, in compliance with local regulations. This translation in English is provided for the convenience of international use.

1.2. Document control

Field	Reference
Policy owner	Compliance Manager
Executive sponsor	Managing Director
Approved by	Management Team
Effective date	29 jul 2026
Review cycle	Annually, and following material legal, business, or risk changes
Applies to	Nucomat bv, directors, employees, temporary and agency workers, interns, and contractors when acting for Nucomat
Related documents	Code of Conduct; Supplier Code; HSE procedures; Privacy Policy; Speak-up Procedure; annual Sustainability Action Plan

1.3. Purpose and principles

Nucomat designs, builds, services, and supports laboratory automation solutions. We aim to create long-term value while preventing and reducing adverse impacts on people, the environment, and society. This policy establishes minimum sustainability commitments for our operations and business relationships.

Our approach is guided by applicable law and informed by the UN Sustainable Development Goals, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the ILO Fundamental Principles and Rights at Work, and recognised greenhouse-gas accounting principles.

Where applicable law and this policy differ, Nucomat follows the higher standard unless doing so would violate local law. Potential conflicts must be escalated to the Policy Owner and if required the legal contact.

1.4. Scope and expectations

This policy applies to all Nucomat-controlled operations and to everyone acting on Nucomat's behalf. Suppliers, subcontractors, distributors, agents, and other business partners are expected to meet equivalent standards through the Supplier Code of Conduct and contractual requirements. We apply requirements proportionately, taking account of the severity and likelihood of impacts, leverage, country and sector risk, and the nature and scale of the relationship.

2. Sustainability policy

2.1. Governance and accountability

- The Management Team approves this policy and oversees material sustainability risks, opportunities, objectives, and performance.
- The Managing Director is accountable for implementation. The Compliance Manager coordinates the annual action plan, legal register, data controls, training, due diligence, reporting, and review.
- Business and project leaders integrate relevant environmental, social, safety, and ethics requirements into decisions, designs, procurement, project execution, and customer support.
- Employees and other workers must follow this policy, complete assigned training, raise concerns promptly, and cooperate with reviews and investigations.
- No sustainability statement or performance claim may be published or provided to customers unless its scope, method, period, evidence, and approval are documented.

2.2. Sustainability risk and due diligence

At least annually, and before material new activities or relationships, Nucomat identifies and prioritises actual and potential adverse impacts, compliance obligations, risks, and opportunities across its operations, products, projects, and value chain. Assessment considers affected stakeholders, including workers, customers, suppliers, nearby communities, and the environment.

Nucomat takes reasonable steps to prevent or mitigate potential impacts, stop or minimise actual impacts, track effectiveness, communicate as appropriate, and provide or cooperate in remediation where Nucomat caused or contributed to harm. Decisions and follow-up are documented.

2.3. Environmental

2.3.1. Climate, energy, and transport

- Measure direct and indirect greenhouse-gas emissions annually using a defined organisational boundary and recognised methodology and improve data quality over time.
- Maintain a climate and energy action plan with a documented baseline, interim and longer-term targets, responsible owners, and progress review.
- Prioritise energy efficiency, low-carbon electricity, electrification where feasible, efficient logistics, lower-emission travel and vehicles, and climate-resilient operations.
- Use carbon offsets only for residual emissions and only where quality criteria and the underlying claim are transparent; offsets do not replace direct reductions.

2.3.2. Pollution, chemicals, and emergency preparedness

- Maintain applicable permits, registrations, inspections, and records, and prevent unauthorised releases to air, water, or soil.

- Inventory hazardous substances; maintain accessible safety data sheets; apply substitution, engineering controls, safe storage, labelling, handling, and disposal; and train affected workers.
- Maintain proportionate spill, fire, severe-weather, and other emergency plans, with assigned responsibilities, equipment, drills, incident reporting, and lessons learned.

2.3.3. Water, biodiversity, and land

- Measure material water withdrawal and discharge, prevent contamination, repair leaks, and prioritise fit-for-purpose reuse where safe and lawful.
- Protect biodiversity and sensitive habitats at and near Nucomat site(s). Before material site or project changes, assess potential impacts and apply the mitigation hierarchy: avoid, minimise, restore, and, only where appropriate, compensate residual impacts.
- Manage landscaping, lighting, noise, runoff, and invasive species to reduce disturbance to nearby ecosystems and communities.

2.3.4. Resources, circularity, waste, and product stewardship

- Apply the waste hierarchy: prevent, reduce, reuse, repair/refurbish, recycle, recover, and dispose as a last resort. Segregate waste and use authorised handlers.
- Prefer durable, repairable, reusable, recyclable, lower-impact, and responsibly sourced materials and packaging when technically, legally, and economically feasible.
- Integrate serviceability, safety, maintainability, energy/resource efficiency, and end-of-life considerations into product and project design.
- Offer repair, refurbishment, spare-parts, dismantling, take-back, or recycling options where feasible and clearly define customer and Nucomat responsibilities.

2.3.5. Environmental data and claims

Environmental data must be complete, consistent, traceable, and retained in accordance with the records policy. Estimates, exclusions, and methodology changes must be documented. Claims must be specific, substantiated, and not overstate the environmental benefit of a product, project, activity, or organisation.

2.4. People and human-rights commitments

2.4.1. Human rights and decent work

- Respect internationally recognised human rights and the ILO fundamental principles and rights at work.
- Prohibit forced or compulsory labor, slavery, trafficking, prison labor contrary to applicable standards, coercion, recruitment fees charged to workers, deposits, restriction of movement, deceptive recruitment, and retention of identity or immigration documents.
- Prohibit child labor. Workers must meet the applicable minimum age. Persons under 18 must not perform hazardous work and may work only under lawful conditions protecting education, hours, safety, and development.
- Provide written, understandable terms of employment; comply with applicable wage, benefit, working-time, rest, leave, and social-protection requirements; and avoid unlawful deductions.
- Respect lawful freedom of association, worker representation, and collective bargaining. Workers may communicate concerns collectively or individually without retaliation.

2.4.2. Equality, inclusion, and respectful conduct

Employment decisions are based on legitimate job-related criteria. Nucomat prohibits discrimination, harassment, bullying, violence, and retaliation based on any characteristic protected by applicable law, including race, colour, national or ethnic origin, religion or belief, sex, pregnancy, sexual orientation, gender identity, age, disability, genetic information, marital or family status, veteran status, or other protected status. Nucomat provides reasonable accommodation where required and supports equal pay for equal or equivalent work.

2.4.3. Health, safety, and wellbeing

- Provide a safe and healthy workplace through hazard identification, risk assessment, the hierarchy of controls, safe equipment and procedures, maintenance, training in an understandable language, and appropriate personal protective equipment.
- Consult and involve workers in safety matters. Workers may report hazards, injuries, illnesses, near misses, and unsafe conditions without retaliation and may exercise applicable stop-work or refusal rights.
- Investigate incidents and near misses, correct root causes, maintain required records, and share lessons appropriately.
- Apply equivalent safety expectations to temporary, agency, contractor, and visiting personnel, with clear allocation of responsibilities.
- Support reasonable measures for mental health, psychosocial risk prevention, workload, and work-life balance, consistent with applicable law and available resources.

2.4.4. Communities and customers

Nucomat seeks to prevent unreasonable nuisance or harm to communities and to engage constructively where activities may materially affect them. Products and services must meet

applicable safety, quality, and information requirements. Customer and end-user claims, instructions, warnings, and sustainability information must be accurate and clear.

2.5. Responsible business conduct

2.5.1. Anti-bribery, gifts, and conflicts

- Do not offer, promise, give, request, or accept bribes, kickbacks, facilitation payments, or anything of value intended to obtain an improper advantage.
- Gifts, hospitality, travel, donations, sponsorships, commissions, discounts, and third-party payments must be lawful, reasonable, transparent, accurately recorded, and never intended to improperly influence a decision.
- Disclose actual, potential, or perceived conflicts of interest and manage them under the Code of Conduct.
- Perform proportionate due diligence on higher-risk agents, distributors, intermediaries, suppliers, and transactions, and include appropriate contractual controls.

2.5.2. Fair competition, trade, and financial integrity

- Compete fairly and do not engage in price fixing, bid rigging, market or customer allocation, improper exchange of competitively sensitive information, abuse of market power, or other unlawful anti-competitive conduct.
- Comply with applicable customs, import/export controls, economic sanctions, anti-boycott, product-origin, and forced-labor import restrictions.
- Maintain accurate books, records, invoices, expenses, time records, and supporting documentation. Do not create undisclosed or misleading accounts or transactions.
- Pay taxes and statutory contributions and cooperate with lawful audits and authorities.

2.5.3. Privacy, cybersecurity, and confidential information

Process personal data lawfully, fairly, and transparently for specified purposes; collect only what is necessary; keep it accurate and no longer than needed; protect it with appropriate technical and organisational safeguards; respect individual rights; and manage incidents and cross-border transfers as required. Protect confidential, customer, employee, supplier, and intellectual-property information against unauthorised access, use, disclosure, alteration, or loss.

2.6. Responsible sourcing and business partners

Nucomat communicates clear requirements through a Supplier Code of Conduct and risk-based contractual terms. Supplier and subcontractor selection considers capability, quality, cost, service, integrity, environmental and social performance, and relevant country, sector, material, and product risks.

- Screen higher-risk relationships before onboarding and periodically thereafter, including beneficial ownership, sanctions, corruption, labor and human-rights, environmental, and quality/safety risks as relevant.
- Request proportionate evidence such as policies, certifications, permits, origin information, records, questionnaires, audits, or site assessments.

- Prioritise improvement: agree time-bound corrective actions, verify completion, and use leverage where possible.
- Escalate severe, repeated, concealed, or unremedied breaches. Suspend or end a relationship responsibly when appropriate, considering potential harm to affected workers and communities.
- Do not rely solely on contractual promises where the risk warrants additional verification.

2.7. Speaking up, investigations, and remediation

Employees, workers, business partners, and other stakeholders may raise concerns or seek advice through their manager, the Policy Owner, the Complaints Officer, or applicable external authorities. Reports may be made confidentially and, where legally available, anonymously.

- Nucomat prohibits retaliation against anyone who raises a concern in good faith, seeks advice, refuses to participate in misconduct, or assists an investigation.
- Concerns are triaged and investigated promptly, impartially, confidentially, and by persons without a conflict of interest. Records and personal data are protected.
- Where concerns are substantiated, Nucomat takes corrective and disciplinary action proportionate to the circumstances and provides or cooperates in appropriate remediation.
- Reporters receive acknowledgement and feedback where lawful and appropriate. Deliberately false reports may result in action, but an unsubstantiated good-faith report will not.

2.8. Training, monitoring, and reporting

- Provide induction and periodic role-based training on this policy and related procedures.
- Maintain an annual Sustainability Action Plan with objectives, baselines, targets, indicators, owners, resources, milestones, and status.
- Monitor compliance and effectiveness using documented data controls, internal reviews, incident/complaint trends, supplier findings, and management review.
- Communicate material performance accurately and in a balanced manner, including relevant limitations, setbacks, and corrective actions.

2.9. Breaches, exceptions, and review

Breaches may result in corrective action, disciplinary measures up to termination of employment or engagement, contractual remedies, and reporting to authorities where required. No exception may permit unlawful conduct or compromise fundamental human rights. Any other exception must be documented, time-limited, risk-assessed, and approved by the Managing Director. This policy is reviewed at least annually and after material changes.