



1. Purpose

The purpose of this policy is to confirm and communicate the strong commitment of Ibsen Photonics (Ibsen) to sustainable growth and corporate social responsibility.

Our Sustainability policy addresses the ethical issues we may encounter, and guides our actions, so we continue achieving our business goals in a responsible manner. Conducting our business ethically and with integrity is an integral part of our values and the way we conduct business.

Our policy is an extension of our philosophy and values. It summarises the important global issues we face and our position on those issues. The Ibsen Sustainability Policy provides a common reference point setting out the principles, by which we expect all employees to abide.

2. Scope

This policy applies to all aspects of Ibsen's operations including our facilities, procedures, products, and services. It encompasses our employees, suppliers, distributors, and other stakeholders doing business on our behalf.

3. Introduction

Ibsen adheres to all applicable national, regional, and international laws and regulations. In addition, we are committed to upholding high standards of sustainability and responsible business practices.

Since 2026, we are a member of the United Nations Global Compact (UNGC) and use the framework's ten principles as the foundation for our corporate social governance. The UNGC's ten principles are derived from:

- The Universal Declaration of Human Rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

Ibsen is dedicated to ensuring continuous improvement in all sustainability aspects of our business operations.

4. Business Ethics Commitment

Anti-corruption and bribery

A bribe can be defined as offering or receiving any monetary payment, loan, reward, or other advantage to commit an act that is dishonest, illegal, or a breach of trust in the conduct of our business. Ibsen employees are not

About this policy

This policy provides an overview of the principles that apply within Ibsen with regard to sustainability and responsible business practices.

Contact us

If you have any questions to this policy, please contact Ibsen compliance via e-mail to info@ibsen.com.

Policy owner

CEO

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allowed to accept or offer bribes or engage in unethical, fraudulent, or corrupt practices for personal or company gain in the conduct of our business. All national and international invoices, as well as monetary payments, shall be registered in Ibsen's financial accounting systems. Ibsen prohibits the use of payments made to government officials to speed up or facilitate the performance of routine, non-discretionary services, or actions, such as issuing a license or permit. Fees paid in accordance with official government procedures accompanied by receipts for payment are permissible.

Gifts and entertainment

In most countries, it is customary to provide gifts and entertainment to existing and potential business contacts to enhance and develop relationships. Ibsen employees may offer or accept gifts and entertainment, if the value is reasonable and in line with country norms, in compliance with legislation, not intended to influence a business decision, and not in the form of cash. Ibsen employees must always inform their immediate manager when offering or receiving a gift or repetitive gifts or entertainment worth more than an accumulated purchase value of €100¹. Ibsen employees must register all expenditures on gifts, trips, and entertainment in Ibsen's financial accounting systems.

Conflicts of interest

At Ibsen, a conflict of interest can be defined as a situation where an employee might have an actual, or potential personal interest, which could conflict with their business duties. An example of this could be the favouring of friends or family for job positions or business contracts. Ibsen employees must always be impartial and avoid conflicts of interest in activities on behalf of Ibsen. Employees must consult their manager if a conflict of interest arises.

Anti-competitive practices

Ibsen is committed to the principle of fair, open, and unrestricted competition. We believe in the fundamental strength of our product portfolio and conduct our business in compliance with all competition acts and regulations globally. We shall continue to compete fairly while acquiring and maintaining business, and we expect all people managers and employees dealing with aspects of competition to know and follow the basic principles of competition law.

As a company, we will never, directly, or indirectly, cooperate with competitors² in any way to fix or coordinate prices, establish minimum prices, divide geographical markets or customer segments, exchange confidential customer data or market strategies, allocate production or sales quota, carry out bid rigging, or in any other way enter into anti-competitive agreements or arrangements.

Likewise, in geographical areas or specific customer segments where Ibsen is likely to have a dominant market position for any given products or services, we shall never carry out any activities that constitute or relate to illegal tying/bundling practices, illegal exclusivity contracts, offering of loyalty rebate schemes, unjustified refusals to deliver, discriminatory or predatory pricing practices, or any other abuse of a dominant market position.

Money laundering

Ibsen is committed to compliance with anti-money-laundering laws and regulations in the context of its business operations and financial transactions worldwide and shall continuously implement and maintain effective procedures and controls to accomplish such compliance.

Political and charitable donations

Ibsen realises that we play an important role in serving and being active in the communities where we operate. Political and charitable donations in the form of cash, services, materials, etc. shall be in accordance with legal requirements, accounted for in our financial accounting systems, and approved by the relevant manager.

¹ If local law is stricter regarding value amounts then local law will prevail

² Competing companies not owned or controlled by N. FOSS & Co. A/S



5. Human and Labour Rights Commitment

Health and Safety

We are committed to ensuring the health and safety of our employees, and all are entitled to a safe and healthy environment in their workplace. Ibsen ensures that training and protective equipment are provided to employees. All employees are required to follow company health and safety procedures, as well as appropriate national legislation, and ensure that contractors follow procedures on Ibsen premises.

Product use

Ibsen is committed to ensuring the health and safety of individuals who use our products. We recognise our responsibility to design, manufacture, and distribute products that are safe for their intended use and to provide clear guidance to users on safe product handling and usage. Ibsen will comply with all applicable health and safety regulations and standards relevant to our products.

Equal opportunities

Ibsen maintains a working environment that treats all employees equally regarding recruitment, advancement, job training, and salary. All employees will have the same opportunities regardless of gender, age, race, ethnicity, sex, religion, sexual orientation, etc. Personal privacy will be respected. Discrimination and verbal or psychological harassment will not be tolerated.

Employee councils

Ibsen respects the legal right of employees to voluntarily join or form trade unions (freedom of association), as well as bargain collectively in negotiations with management on key conditions of employment. Ibsen recognises employee representatives or trade unions based on established criteria and processes. We are committed to open and constructive communication with employee representatives and trade unions. We strive to hold regular meetings to discuss matters of mutual concern, and we engage in good-faith negotiations. In cases of disputes or conflicts, Ibsen is committed to resolving them promptly. Ibsen will not engage in any form of retaliation against employee representatives for their participation in labour related activities.

Working conditions

Ibsen complies with applicable laws, international conventions, and binding union agreements regarding working hours and overtime for employees. Ibsen is committed to ensuring that, as a minimum, salaries should correspond with national salary legal requirements and meet employees' basic living needs. We offer competitive salaries in the countries, where we operate. Further, in countries where our employees are unionised, we honour our formal agreements with trade unions.

Elimination of child labour

Ibsen does not employ children and does not support or endorse any form of child labour as defined by ILO Conventions on child labour.

Modern slavery

Ibsen is against forced or compulsory labour, including Modern Slavery, and ensures that employees are employed voluntarily and of their own free will. No person will be forced to accept employment, work overtime, or have their identification papers retained.

External stakeholders

Ibsen requires suppliers and contractors to ensure the same human and labour rights as Ibsen employees. Hence, suppliers and contractors are required to sign Ibsen's Supplier Code of Conduct.



6. Environmental Commitment

Chemicals and hazardous waste

Ibsen complies with applicable laws and regulations regarding the handling, storage, and disposal of chemicals and hazardous waste. We are committed to reducing and eliminating the use of chemicals in our products. We strive to ensure the safe handling, storage, and disposal of chemicals and hazardous waste in our production facilities.

Energy consumption and greenhouse gases

Ibsen is committed to responsible energy management and the reduction of greenhouse gas emissions. We recognise the importance of mitigating climate change and minimising our environmental impact.

Air pollution

Ibsen will strive to protect the health and well-being of employees and the environment by reducing or eliminating emissions of harmful pollutants.

Waste

Ibsen complies with applicable laws and regulations regarding waste disposal in the countries where we operate. We strive to recycle and reuse materials/packaging whenever possible and manage waste in a healthy, safe, responsible, and environmentally friendly manner.

Wastewater

Ibsen complies with the requirements of applicable laws and regulations regarding the discharge of wastewater. Ibsen is committed to reducing the wastewater generated from our facilities globally.

Water

Ibsen endeavours to reduce water consumption by conserving and reusing water in our facilities.

Promotion of sustainable consumption

Ibsen is committed to promoting sustainable consumption practices. We recognise our role in influencing consumer behaviour and believe in fostering responsible and sustainable choices among our customers. Ibsen's commitment to sustainable consumption extends across our products, services, and operations.

Production and use of products

Ibsen is committed to minimising the environmental impacts associated with the production and use of our products. Ibsen encourages responsible resource management and aims to extend the lifespan of our products and reduce the overall environmental impact.

Product end-of-life

Ibsen is committed to minimising the environmental impacts associated with our products' disposal and end-of-life management. Ibsen aims at the use of recyclable, biodegradable, or reusable materials to minimize waste generation.

Biodiversity

Ibsen will strive to protect and conserve biodiversity in the areas where we operate. We will adopt and promote sustainable business practices that minimise our negative impact on biodiversity.



7. Sustainable Procurement Commitment

Responsible supply chain

Ibsen expects its suppliers to have appropriate measures in place to address Human and Labour Rights, the Environment, and Business Ethics. Our Supplier Code of Conduct provides information on these requirements. We will continuously evaluate our suppliers to ensure they meet our standards.

Conflict minerals

Ibsen condemns all activities related to the use of conflict minerals (tin, tantalum, tungsten and gold) originating from high-risk areas anywhere in our supply chain. We are dedicated to ensuring that our supply chain remains free from these conflict minerals, which is why suppliers to Ibsen are required to conduct due diligence in the aspects of securing responsible sourcing of conflict minerals.

8. Sustainable Sales Commitment

Responsible value chain

Ibsen expects its customers to have appropriate measures in place to address Human and Labour Rights, the Environment, and Business Ethics. We will continuously evaluate our customers to ensure they meet our standards.

9. Compliance

All Ibsen employees must comply with this Sustainability Policy. Any Ibsen employee who violates this policy will be subject to appropriate disciplinary action, independently from potential other penalties resulting from his/her behaviour. If an employee experiences a breach of our policies or the law, needs assistance, or would like to raise a concern, then they should contact their immediate manager.

As part of the FOSS Group, Ibsen has implemented a whistleblower system, <https://foss.whistleblownetwork.net>, to give employees and other stakeholders the possibility to report suspected violations of the law or non-compliance with our values or policies. Every violation report is important and helps us to prevent economic losses and damage to our reputation. All reports are strictly confidential.

10. Changes to this Sustainability Policy

This policy will be reviewed annually by Ibsen's Senior Management team to ensure its ongoing relevance and effectiveness. By adopting and adhering to this sustainability policy, Ibsen demonstrates our commitment to sustainable practices.



Henrik Skov Andersen, CEO

July 22nd, 2026