PWT GROUP AALBORG, NOVEMBER 2016

CSR POLICY COMMITMENT FOR PWT GROUP

With our engagement in the UN Global Compact, PWT Group are committed to seeking to prevent, address and mitigate adverse impacts on the basic principles for social (human rights including labor rights), environmental, and economic (anti-corruption) sustainability. This Policy Commitment covers all three areas.

Our Policy Commitment refers to international endorsed principles for sustainable development; The International Bill of Human Rights, including the core labor rights from the ILO declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the UN Convention against Corruption.

We are committed to seek to prevent, address and mitigate adverse impacts on all three areas, as set forth in the UN Guiding Principles on Business and Human Rights (UNGPS, 2011) and implemented in the OECD Guidelines for Multinational Enterprises (2011). All other policies and procedures for PWT Group will be aligned with this CSR Policy Commitment.

OUR OWN OPERATIONS

This CSR Policy Commitment applies to the entire PWT Group and all activities for the PWT Group. We will, at any time and place, establish processes that enable us to identify, prevent, and mitigate potential adverse impacts, that we are contributing to through our business activities. If we find that we have caused or contributed to any actual adverse impacts, we will support remediation for the affected stakeholders and/or notify the relevant authorities.

We expect of our employees that they assist us in meeting our responsibility. We will support capacity-building for our employees on human rights, environmental sustainability and anti-corruption, and inform them how they can support the work on addressing potential adverse impacts. If any of our employees identify potential or actual adverse impacts, we expect them to inform the management about the identified issue.

In our annual financial report, we will communicate on our sustainability work and describe how we are addressing adverse impacts that we possibly could cause, contribute to or be directly linked to. Before making any major changes in our existing activities we will identify the potential adverse impacts on the three mentioned areas.

OUR BUSINESS RELATIONSHIPS

We acknowledge that we have a responsibility to seek to prevent and mitigate adverse impact that we discover through our business activities. To be able to meet this responsibility we expect from our business partners (including suppliers and sub-suppliers) that they carry out due diligence processes and thereby identify, prevent and mitigate any adverse impacts on human rights, the environment and anti-corruption.

Our collaboration with our suppliers are based on our Code of Conduct, which refers to the UNGPs and defines the minimum expectation that we and our business partner need to be in compliance with. Our Code of Conduct sets the framework for how we cooperate with the suppliers on enabling them to live up to their responsibility and meet the international minimum standard.

If we find that our business partners are not addressing their adverse impacts, we will use our leverage to push the specific entity in the right direction and start taking on its responsibility. We expect from all our business partners that they immediately notify us if they find out about any adverse impact that they are causing, contributing to or linked to – and we expect them to seek to prevent and mitigate their reoccurrence.

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ADVERSE IMPACT AND NATIONAL LAWS AND REGULATIONS

We take for granted that PWT Group and our business partners are compliant with national laws and regulations. We distinguish between being compliant with laws and regulations in any given jurisdiction and establishing and conducting management processes for due diligence on the mentioned sustainability areas. By establishing such due diligence processes, PWT Group and our business partners will be able to address challenges before they become severe issues and law violations.

Should national laws and regulations, as an exception, impose PWT Group or our business partners to cause or contribute to adverse impacts we will seek to conduct due diligence in accordance with the sustainability principles without violating such laws and regulations.

GRIEVANCE MECHANISM

PWT Group appreciates and respects an honest and open communication, and therefore all stakeholders – including employees – have the possibility to ask questions or report any potential or actual negative impacts to our CSR hotline, compliance@pwtbrands.com. We are committed to investigate all such reports and take appropriate measures when needed.

Employees who report about any such negative impacts will not be subject to any reprisals, and we are committed to monitor and handle all potential complaints immediately.

EVALUATION

The implementation and effectiveness of this CSR Policy Commitment will be evaluated annually by the management to secure that PWT Group is meeting its responsibility and the minimum expectation from the UN and the OECD. This document will continuously be updated in order to support the implementation.

AALBORG, 22. NOVEMBER 2016

Ole Koch Hansen

CEO

Henrik Theilbjørn (Chairman)