PROTRA GROUP

Sustainability, Environmental & Compliance Policy

Responsible production. Reliable partnerships.

Document owner	**Protra Group a/s**
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1. Purpose and scope

This policy sets out the general principles that guide Protra Group's approach to sustainability, environmental responsibility, human rights, labour practices, responsible supply-chain management, business ethics and product-related compliance.

Protra Group develops and manufactures customer-specific products for professional customers. We work with a wide range of materials, suppliers and production processes, and products are developed according to individual customer requirements, applications and specifications.

For this reason, requirements and supporting documentation are assessed at the appropriate level. This policy describes company-level principles and practices. Product- and material-specific requirements are assessed separately according to the relevant product, materials, components, production processes, intended use and applicable legislation.

2. Sustainability & ESG

Protra Group is committed to conducting its business responsibly and to continuously improving the environmental and social aspects of its activities. Our sustainability approach focuses on matters relevant to our business and our role as a manufacturer of customer-specific products.

- Responsible sourcing and supplier relationships.
- Consideration of material selection and material efficiency.
- Durable products and solutions designed for their intended application.
- Efficient use of resources and reduction of unnecessary waste.
- Responsible working conditions and respect for human rights.
- Compliance with applicable legislation.
- Continuous improvement of our business practices.

The relevant sustainability considerations may vary depending on the materials, production processes and intended applications involved. We aim to work constructively with customers and suppliers to address relevant requirements in a practical and proportionate manner.

3. Environmental Responsibility

Protra Group recognizes its responsibility to minimize the environmental impact of its activities where reasonably possible. Environmental considerations may be taken into account when selecting materials, suppliers and production solutions.

- Efficient use of materials and other resources.
- Reduction of material waste.
- Responsible handling and disposal of waste.
- Consideration of energy consumption.
- Consideration of the selection and use of materials.
- Compliance with applicable environmental requirements.
- Continuous improvement of relevant processes.

Because Protra Group manufactures customer-specific products, environmental requirements may differ between products and applications. Relevant requirements are therefore assessed according to the specific circumstances rather than through a single approach intended to cover every product. Protra Group is committed to complying with applicable environmental legislation and improving its environmental performance as part of its ongoing business development.

4. Human Rights & Labour

Protra Group respects internationally recognized principles concerning human rights and responsible labour practices.

Protra Group does not accept:

- Child labour.
- Forced or compulsory labour.
- Discrimination.
- Harassment or abusive treatment.
- Unsafe working conditions.

We expect employees and business partners to treat people with respect and dignity. Protra Group is committed to providing a safe and professional working environment and to complying with applicable requirements concerning occupational health and safety, working conditions and employment practices.

We also expect relevant suppliers and business partners to operate in accordance with applicable laws and recognized principles concerning human rights and labour conditions.

5. Responsible Supply Chain

Protra Group works with a network of suppliers and production partners to manufacture customer-specific products. Responsible supply-chain management is an important part of being a reliable long-term business partner.

- Selecting and working with reliable suppliers.
- Maintaining ongoing supplier relationships.
- Considering quality, compliance and responsible business practices when working with suppliers.
- Communicating relevant requirements to suppliers where appropriate.
- Requesting relevant material and compliance information where required.
- Addressing product- or material-specific requirements according to the relevant application.

The level of documentation and assessment required may vary depending on the material, product, application and applicable legislation. Where relevant, Protra Group obtains information and declarations from suppliers regarding materials and regulatory requirements.

6. Supplier Code of Conduct

Protra Group expects its suppliers and business partners to conduct their activities responsibly and in accordance with applicable legislation. We expect relevant business partners to support the following principles:

- Respect for human rights.
- Prohibition of child labour.
- Prohibition of forced labour.
- Safe and healthy working conditions.
- Fair and respectful treatment of employees.
- Compliance with applicable employment legislation.
- Environmental responsibility.
- Responsible business conduct.
- Anti-corruption and ethical business practices.

Protra Group aims to build long-term relationships with suppliers who share these principles. Where appropriate, specific requirements may be communicated directly to suppliers or addressed as part of a customer-specific supply-chain requirement.

7. Business Ethics & Anti-Corruption

Protra Group is committed to conducting business fairly, honestly and responsibly. We do not tolerate bribery or corruption and expect employees and business partners to comply with applicable laws and ethical standards.

- No bribery or improper payments.
- Responsible handling of gifts and hospitality.
- Avoidance and appropriate management of conflicts of interest.
- Fair and honest business practices.
- Compliance with applicable laws and regulations.
- Respect for confidential business information.
- Professional and respectful relationships with customers, suppliers and business partners.

We believe that long-term business relationships are built on trust, transparency and professional conduct.

8. REACH

Protra Group recognizes the importance of compliance with applicable requirements under the EU REACH Regulation. As a manufacturer of customer-specific products using a wide range of materials, we work with suppliers to obtain relevant information concerning the materials and substances used in our products.

Where relevant, we request supplier declarations or other supporting information regarding REACH and substances of very high concern (SVHC). Due to the customer-specific nature of our products and the range of materials involved, REACH requirements are assessed according to the relevant materials, products and applications.

Protra Group does not apply a single material declaration to all products. Where a specific REACH assessment or supporting documentation is required for a particular product or material, this can be assessed and provided where applicable.

9. RoHS

The RoHS Directive primarily concerns electrical and electronic equipment and restricts certain hazardous substances in such products.

The majority of products manufactured by Protra Group are customer-specific textile, PVC, leather and related products that are not electrical or electronic equipment and are therefore generally outside the scope of the RoHS Directive.

Where a product, component or application supplied by Protra Group falls within the scope of applicable RoHS requirements, the relevant requirements will be assessed accordingly. Where appropriate, relevant supplier declarations or supporting documentation may be obtained for specific components or materials.

RoHS applicability is assessed according to the specific product and application rather than through a blanket declaration covering all products.

10. Certifications & Documentation

Protra Group maintains relevant business, material and compliance documentation where applicable. Due to the customer-specific nature of our products, documentation relevant to one product or application may not be relevant to another.

Depending on the specific requirements, documentation may include:

- Supplier declarations.
- Material documentation.
- REACH-related information.
- RoHS-related information, where applicable.
- Product or material test documentation.
- Relevant certificates.
- Customer-specific compliance documentation.

Where a customer requires specific documentation, Protra Group can assess the requirement based on the relevant product, material and application.

11. Product-Specific Requirements

Protra Group has developed and manufactured a large number of customer-specific products over many years. Because products are developed according to individual customer specifications and applications, one identical set of compliance documentation cannot necessarily be applied to every product.

Protra Group therefore distinguishes between:

11.1 Company-level requirements

General policies and principles concerning sustainability, environmental responsibility, human rights, labour practices, responsible sourcing and business ethics.

11.2 Product- and material-specific requirements

Requirements that depend on the actual materials, components, production processes, intended use or applicable legislation for a particular product.

This approach allows Protra Group to provide relevant and meaningful documentation without making general claims that may not apply to every customer-specific product.

12. Requests for Additional Information

Customers and business partners requiring additional sustainability, compliance or product-specific documentation are invited to contact Protra Group. We will assess the relevant requirements and provide available information or documentation where applicable.

13. Policy Review and Approval

This document describes Protra Group's general approach and principles as presented in the company's Sustainability & Compliance information. It should be reviewed internally and formally approved by the appropriate management representative before being issued as an approved corporate policy.

The policy should be reviewed periodically and when material changes occur in the company's activities, applicable requirements or business practices.

Approved by	**Carina Malmkvist Poulsen**
Title	COO – Portra Group a/s
Date	16 Nov. 2026

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