



Policy Commitment on Sustainability

At Sustainable Cloud Technology ApS, we have developed our expertise in the field of responsible business conduct. We support businesses implement the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises for Responsible Business Conduct (OECDG). The UNGPs/OECDG constitute the international minimum standard for responsible business conduct, also referenced as the minimum safeguards in the EU Regulation on Sustainable Finance Disclosure. The UNGPs/OECDG are referred to as the Standard.

Sustainable Cloud Technology ApS is a Software as a Service (SaaS) provider. Our cloud-based platform, SEE impacts, enables businesses to implement and maintain Sustainability Due Diligence across all their operations in alignment with the Standard. The platform also includes a bespoke grievance mechanism that enables effective management of actual impacts, informed stakeholder engagement, and meeting the accountability measures of the Standard.

The platform is under constant development to continuously improve its functionality as a basis for reporting, including double materiality, responsibility in business relationships, hereunder responsible investments, strategic contributions to sustainable development, heightened due diligence in conflict-affected areas, and communication.

Our strategic objective, next to creating best practices with our licensees, is to contribute to the fulfilment of the 'right to education'. We constantly seek to develop capacity amongst professionals and others interested, and to create a platform to enable capacity development and provide practical guidance for adequate alignment with the Standard – all to meet our endeavours to scale up responsible business conduct.

Sustainability - The Triple Bottom Line

Our commitment means, that we continuously identify, prevent, or mitigate, our risks of adverse impacts in relation to all core areas of sustainability, i.e., all 48 human rights from the International Bill of Human Rights, that includes the five core labour rights, all 20 environmental areas, including the six areas from the EU taxonomy, and all 16 economic areas, including corruption, extortion, fraud, anti-competition, and tax avoidance.

We manage these through regular operational-level impact assessments covering all areas, and we communicate how we manage adverse impacts to relevant stakeholders.

Our expectations to employees

Our employees are key partners in assisting us in meeting the Standard and our strategic objectives. We expect all team members at Sustainable Cloud Technology ApS to assist us in honouring our commitment. We embed our commitment in the daily work of both our employees and management through training, communication, and ongoing assessments.

We always appreciate input to improve our efforts to identify, prevent or mitigate - or remediate - our adverse impacts on sustainability, as well as to make a positive impact.



Our expectations to business relationships

We expect all our business relationships to meet the Standard. Business relationships shall implement the Standard, i.e., commit to and manage risks of adverse impacts in relation to social (human rights), environmental, and economic sustainability, and be prepared to share their results with relevant stakeholders. We also expect them to ask the same from their business relationships. Information of severe impacts shall be communicated officially or directly to us promptly.

We cannot provide our services to companies that do not meet, or intend to meet, the Standard.

Integration

This policy commitment is reflected in all other policies, guidelines, and procedures at Sustainable Cloud Technology ApS. We encourage our employees and other stakeholders to inform us about challenges in relation to any of the core elements of sustainability associated with our products, services, or business relationships.

SEE impacts

We developed the cloud-based platform, SEE impacts, in cooperation with GLOBAL CSR/Skadegaard Thorsen, to enable businesses, including our business, to implement the management system defined by the Standard in a pragmatic manner – and as envisioned by ‘the principled pragmatism’ under which Prof. John Ruggie presented the UNGPs. As a part of our commitment to the Standard, we use the platform to enable us to document regular operational-level impact assessments in alignment with the Standard.

Our intention is to further develop and scale up SEE impacts to enable the development of capacity beyond our company, and to support businesses in meeting the Standard in the most cost-efficient and pragmatic, yet adequate, manner.

Policy Commitment development

This policy is developed by our internal experts and approved by the owner and CEO. The policy commitment is communicated both internally and externally. The policy commitment will be reviewed and, if necessary, revised every second year reflecting our progress in implementation.

Copenhagen, Denmark
June 18, 2025

A blue ink handwritten signature of Sune Skadegaard Thorsen.

Sune Skadegaard Thorsen
CEO and Founder