



ESG Policy

Purpose

The purpose of this ESG policy (hereafter "Policy") is to outline Nobly's commitment to environmental, societal and governance matters that are relevant to our operations.

This Policy defines the foundational ESG principles through which Nobly meets applicable legislative requirements and market expectations. It reflects our commitment to conducting business with integrity, ethics, and responsibility.

The Policy also describes how Nobly integrates ESG considerations into strategic planning, risk management, and employee engagement in a manner that is proportionate to the nature of our business and supports long-term sustainability.

Nobly is committed to complying with applicable national and international legislation and regulations, as well as the Ten Principles of the United Nations Global Compact, which form the foundation of this Policy.

Furthermore, Nobly expects suppliers, partners, and other business relationships to demonstrate equivalent standards of compliance and ethical conduct.

Nobly aims to be a responsible and reliable IT and consulting company, offering a secure, diverse, and inclusive workplace.

Scope

This Policy applies to all functions, employees, management, and board members of Nobly and extends to our interactions with third parties, including vendors, suppliers, and business partners.

All processes related to ESG issues must align with this Policy.

Management is responsible for promoting awareness of ESG considerations and encouraging employees to make responsible and sustainable business-related decisions, thereby ensuring continued compliance.

Environment

Nobly is committed to acting responsibly with regard to environmental impact, within the scope of our operational control.

As a SaaS and IT consulting company, Nobly has limited direct environmental impact and limited operational control over key emission sources. Cloud infrastructure and data hosting are provided by third-party suppliers, and office facilities are rented with electricity sourcing determined by property owners.

Accordingly, Nobly does not establish absolute greenhouse gas or CO₂ reduction

targets where operational control is absent. Instead, Nobly addresses environmental responsibility through:

- Responsible use of technology and digital solutions
- Awareness of energy consumption and technology waste
- Recycling and responsible handling of IT equipment
- Consideration of environmental factors in supplier selection where feasible

By aligning with global environmental objectives, Nobly integrates sustainability considerations into relevant business decisions, including cloud computing and digital services, without overstating direct environmental impact.

Nobly supports and aligns with the UN Global Compact principles on environmental responsibility:

Principle 7 Businesses should support a precautionary approach to environmental challenges.

Principle 8 Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9 Businesses should encourage the development and diffusion of environmentally friendly technologies.

Social responsibility

Nobly is committed to promoting diversity, equality, and inclusion within the organisation and ensuring equal access to opportunities and fair treatment for all employees.

We foster a culture based on collaboration, respect, and innovation, and we do not tolerate discrimination based on gender, age, ethnicity, religion, sexual orientation, disability, or other protected characteristics.

Declaration Against Social Dumping

Nobly explicitly rejects social dumping in all forms. Employment terms, remuneration, and working conditions shall always comply with applicable legislation and recognised labour standards. Nobly does not engage in practices that undermine fair wages, working conditions, or labour rights, and expect suppliers and partners to adhere to the same principles.

Employee Wellbeing

Nobly is committed to fostering a workplace that prioritises employee wellbeing. This includes promoting a healthy work-life balance, flexible work arrangements, mental health awareness, and a supportive culture that encourages open communication.

Data Protection and Trust

Nobly prioritises data privacy and information security, ensuring that clients and users can trust Nobly with sensitive information. Ethical data management is fundamental to safeguarding rights and maintaining confidence in digital services.

Community Engagement

Nobly supports initiatives that contribute positively to society, including engagement with NGOs, participation in local activities, and the use of local suppliers where feasible. Nobly believes that local engagement contributes to shared societal responsibility.

Nobly's commitment to social responsibility extends to its value chain. Suppliers are expected to adhere to Nobly's Code of Conduct, including requirements related to labour rights, environmental responsibility, and ethical business behaviour. Violations may result in corrective actions.

Nobly aligns with the UN Global Compact principles on labour rights:

Principle 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4 Businesses should support the elimination of all forms of forced and compulsory labour.

Principle 5 Businesses should support the effective abolition of child labour.

Principle 6 Businesses should support the elimination of discrimination in respect of employment and occupation.

Governance

Nobly strives to be a reliable and responsible partner by conducting business transparently, credibly, and ethically at all levels of the organisation.

A comprehensive Code of Conduct defines expectations for ethical behaviour, supported by a [Whistleblower Scheme](#) that allows employees to report concerns safely, anonymously, and confidentially.

Nobly maintains clear organisational responsibilities, strong internal controls, and compliance with applicable national and international legislation.

IT security is prioritised through compliance with relevant standards and regulations, including DORA, GDPR, NIS2, CIS18, and ISO 27001, to protect data, systems, and stakeholders.

The Compliance Officer, in collaboration with management, oversees implementation of this Policy. ESG matters are monitored through compliance

processes and reviewed by the Board to support continuous improvement.

Nobly maintains a zero-tolerance approach to bribery, corruption, and unethical business conduct.

Nobly aligns with the UN Global Compact principles on human rights and anti-corruption:

Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2 Businesses should make sure that they are not complicit in human rights abuses.

Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery.

Annual ESG Status Reporting

Nobly commits to maintaining transparency by preparing a periodic ESG status update describing the company's ESG position, scope, and any material changes. The status update reflects implementation of this Policy and does not introduce new commitments beyond those defined herein.

Compliance

The following circumstances are considered serious violations of this Policy:

- Acceptance of bribery
- Sexual harassment or hate crimes
- Discrimination based on gender, religion, ethnicity, or other protected characteristics
- Misuse of the Whistleblower scheme

Violations may result in disciplinary or corrective actions.

Related policies

This Policy shall be read in conjunction with:

- Code of Conduct
- Privacy Policy
- External Information Security Policy