

Responsibility Policy

2021.AI

Version number and date of policy update: v1.0 2025-12-12



Responsibility Policy

1.	Purpose	1
2.	Responsibility	1
3.	Social Responsibility	1
4.	Environment and Climate	3
5.	Governance	3
6.	Transparency and Documentation	4

1. Purpose

- 1.1. The responsibility policy of 2021.AI outlines how we work with environmental, social, and governance issues – including the working conditions of our own workforce.
 - 1.1.1. The responsibility policy applies to all individuals with an employment contract with 2021.AI. In this policy, they are collectively referred to as 'employees'.
 - 1.1.2. Breaches of this policy may result in warnings or dismissal, as well as updates to procedures and training to prevent future incidents.

2. Responsibility

- 2.1. By signing this document, the management of 2021.AI commits to ensuring compliance with all aspects of this policy.
- 2.2. The responsibility for maintaining, updating, and communicating this policy lies with the COO. The policy is reviewed and revised when deemed relevant.
- 2.3. We continuously ensure that all employees are informed about the policy, their rights, and how they can contribute to its implementation.

ACTION

As part of our onboarding of new employees and general internal training, we make sure that all staff are informed about and introduced to our responsibility policy.

TARGET

All employees are informed annually about any updates to the policy.

3. Social Responsibility

- 3.1. At 2021.AI, we aim to create a safe, healthy, and fair working environment for all employees. We secure this through the following measures:
 - 3.1.1. **Employment conditions**
 - 3.1.1.1. All employees must have a signed employment contract no later than 7 calendar days after their employment has begun at 2021.AI.
 - 3.1.1.2. The contract must include general information about the employee, all essential terms of employment, and comply with potential collective agreements, minimum wage requirements, and other relevant labour regulations under current legislation.

- 3.1.1.3.** We respect and support all employees' right to freedom of association, including the right to be part of a union and participate in employee committees.

3.1.2. Training and development

At 2021.AI, all employees have access to relevant training and development opportunities that support their professional growth within the company. This includes both formal and informal learning activities, such as participation in webinars, conferences, and similar formats.

You may choose to refer to your actions and targets, for example:

ACTION

As part of the employee development review, we focus on identifying relevant courses, conferences, or similar activities that can help upskill the employee in relation to their current or future tasks and responsibilities.

TARGET

Each year, all employees must have completed up to 40 hours of formal or informal training and development.

3.1.3. Equal Treatment

- 3.1.3.1.** At 2021.AI, we do not accept any form of discrimination, harassment, or violent behaviour. This applies to – but is not limited to – gender, race, colour, religion or belief, political opinion, sexual orientation, age, disability, or national, social, or ethnic origin.

- 3.1.3.2.** When it comes to wage and working conditions as well as in hiring, promotion, transfer, or dismissal, no one may be discriminated against or assessed based on the criteria listed above.

3.1.4. Safety

At 2021.AI, we protect our employees and prevent workplace accidents by ensuring that necessary safety measures and equipment are in place. All employees are informed and trained in key procedures, including our evacuation plan, fire safety, and the safe handling of hazardous materials, chemicals, and/or machinery.

ACTION

We conduct annual orientation in health and safety to ensure that all employees are familiar with our procedures and can help protect their own and each other's health and safety at the workplace.

TARGET

Our goal is zero workplace accidents, work-related injuries, and near misses.

3.1.5. Health and well-being

At 2021.AI, we work to ensure a healthy physical work environment with a focus on proper ergonomics, lighting, and indoor climate, as well as a safe psychosocial work

environment based on mutual respect. This includes supporting good collaboration across the company and paying attention to individual workload.

ACTION

We arrange regular one-on-one conversations with all employees to ensure their mental wellbeing, professional development, and manageable workloads.

TARGET

Our goal is zero cases of work-related stress.

3.1.6. Child and youth labour

3.1.6.1. We do not allow child labour that is in violation of Danish legislation.

3.1.7. Forced labour and human trafficking

At 2021.AI, we do not allow any form of forced labour or human trafficking, and we do not make use of or benefit from forced labour.

ACTION

We continuously ensure that all employees work within the job description stated in their employment contract and within a reasonable number of working hours.

TARGET

Our goal is to maintain a safe and secure working environment where no employee experiences violations of their terms of employment.

4. Environment and Climate

At 2021.AI, we have a separate environmental and climate policy that outlines our actions in these areas. This policy applies on equal terms with this responsibility policy.

5. Governance

5.1. At 2021.AI, we aim to run a transparent and responsible business and ensure compliance with all applicable national laws and regulations. We do so through the following measures:

5.1.1. Responsibility

The responsibility for working with this policy lies with our COO. The work includes maintaining, updating, and communicating the policy. The policy is reviewed and revised when considered relevant.

5.1.2. Complaints-handling mechanism

All employees have the opportunity to report complaints related to inappropriate behavior or activities that conflict with this responsibility policy. Reports can be made to the Board. 2021.AI ensures that there will be no negative consequences for anyone who raises a concern. If a complaint is submitted, 2021.AI will initiate an investigation

and take the necessary steps to prevent future incidents.

5.1.3. Responsible procurement

At 2021.AI, we actively consider the impact of our purchases and strive to prioritise responsible procurement choices wherever possible.

5.1.4. GDPR and Data Security

At 2021.AI, we comply with all applicable laws on personal data and information security related to our business, employees, and customers, including GDPR. This includes the collection, storage, updating, and deletion of general, sensitive, and confidential personal data, business information, and more.

5.1.5. Anti-corruption and bribery

2021.AI does not accept any form of corruption, bribery, blackmail, money laundering, fraud, or similar practices.

ACTIONS

We have defined clear rules for the acceptance of gifts, travel, and hospitality, including a maximum value threshold and a requirement for management approval. Rules are stated in our Code of Conduct.

5.1.6. Suppliers and business partners

We strive to work with suppliers and business partners who share 2021.AI's values and principles. At a minimum, they must comply with national legislation and respect and ensure proper working conditions for their employees.

6. Transparency and Documentation

- 6.1.** We aim to be an open and transparent company, sharing information about our processes and practices. Therefore, we ensure that customers have access to relevant information and data when purchasing our products/services or upon request.

ACTION

Our responsibility policy is publicly available on our website.

COO signature



Martin Nørballe

COO of 2021.AI