



Human Rights Policy

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Introduction & Scope

Introduction

At Northern Data Group (hereinafter “Group” or “Northern Data”), we are committed to respecting and promoting internationally recognized human rights throughout our operations and value chain. As a global provider of cloud services, data center solutions, and related infrastructure, we acknowledge that our activities may have direct or indirect impacts on individuals, workers, communities, and the environment. We therefore consider the protection of human rights a core element of responsible business conduct and long-term value creation.

This Human Rights Policy establishes the principles and minimum standards that guide how Northern Data identifies, prevents, mitigates, and addresses adverse human rights impacts connected to our business activities. It reflects our commitment to ethical conduct, transparency, and accountability and is informed by internationally recognized human rights frameworks.

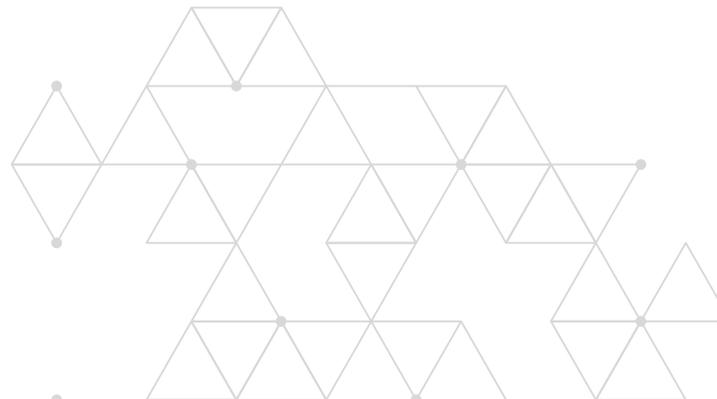
Scope

This Policy applies to all employees at Northern Data AG and its subsidiaries worldwide. It also sets clear expectations for contractors, suppliers, and other business partners to respect human rights and to act in line with internationally recognized standards.

The Policy covers:

- » Northern Data’s own operations,
- » Our supply chain and procurement activities, and
- » Our relationships with customers, partners, and communities where our business activities may impact people or the environment.

This Policy complements other internal policies, including the Code of Business Conduct & Ethics for Employees, the Supplier Code of Conduct, Global Health & Safety Policy, and Data Protection Policies. Where differences exist, the higher standard shall apply.



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What are Human Rights?

Human rights are fundamental rights and freedoms inherent to all individuals, regardless of nationality, place of residence, gender, ethnicity, religion, or any other status. They are based on the principles of human dignity, equality, fairness, and respect. While many countries enshrine human rights in national legislation, legal protections may vary or be insufficient in certain contexts.

Northern Data recognizes that human rights include, among others:

- » The right to life, liberty, and personal security
- » Freedom from slavery, forced labor, and human trafficking
- » Freedom from discrimination and harassment
- » The right to just and favorable working conditions, including fair wages
- » The right to health, rest, and leisure
- » Freedom of association and the right to collective bargaining
- » The right to privacy and protection of personal data
- » The right to participate in cultural, social, and political life
- » The right to a clean, healthy, and sustainable environment

Where national laws and international human rights standards differ, Northern Data seeks to respect the higher standard where possible. In situations where international standards cannot be fully realized due to local legal constraints, we aim to uphold their principles to the greatest extent possible within the applicable legal framework.

This commitment includes emerging standards relating to digital rights, AI related fairness and transparency, and technology enabled freedoms, especially relevant to our cloud and data-driven operations.

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Commitment to Human Rights and Fair Labor Standards

Northern Data is committed to respecting human rights in line with internationally recognized principles and standards, including:

- » The [International Bill of Human Rights](#), comprising the [Universal Declaration of Human Rights](#), the [International Covenant on Civil and Political Rights](#), and the [International Covenant on Economic, Social and Cultural Rights](#),
- » The Core Conventions of the International Labor Organization (ILO),
- » The [ILO Declaration on Fundamental Principles and Rights at Work](#),
- » The United Nations Global Compact (UNGC),
- » The United Nations Guiding Principles on Business and Human Rights (UNGPs), and
- » The [OECD Guidelines for Multinational Enterprises](#).

We do not tolerate human rights abuses in our operations or value chain. Threats, intimidation, or retaliation against individuals who raise concerns or defend human rights are not accepted. All employees and business partners are expected to respect these commitments and to act with integrity and responsibility.

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Human Rights and Environment-related action areas

4.1. Human Rights of our Employees

Northern Data is committed to providing a respectful, inclusive, and safe working environment for all employees. As outlined in Northern Data's Code of Business Conduct & Ethics for Employees, employees are also expected to comply with all applicable law, regulations, company policies, and fundamental principles relating to human rights.

Prohibition of Forced Labor, Child Labor, and Commitment to Fair Employment

We strictly prohibit all forms of forced labor, including bonded labor, human trafficking, and modern slavery. Child labor is not tolerated. Employment with Northern Data is voluntary, and employees are free to leave in accordance with applicable laws and contractual terms. Recruitment fees are not charged, and personal documents are not retained, ensuring employees' rights, freedom of movement, and the ability to resign without restriction. All employment terms are communicated clearly and transparently in a language understood by the employee.

Equal Opportunity, Diversity, and Respect

We are committed to creating a workplace where every individual is treated with dignity and respect. We strictly prohibit all forms of discrimination ensuring that personal factors are never a basis for

unequal treatment. We have zero tolerance for any form of harassment - physical, psychological, or sexual - or any threats of such behavior. Bullying, intimidation, and harm to others, whether through verbal (written or spoken) or non-verbal actions (gestures, expressions, physical contact), are strictly forbidden.

Fair Compensation, Working Conditions, and Employee Well-Being

Northern Data is committed to providing fair and competitive wages and benefits that meet or exceed applicable legal requirements in all jurisdictions where we operate. We recognize that compensation structures, working hours, rest periods, and leave entitlements vary across countries and ensure compliance with all relevant local regulations through robust human resources processes and governance structures.

We respect employees' rights to rest, recovery, and leisure time and support long-term employability by investing in training, education, and professional development programs. In addition, we promote employee well-being through initiatives that support physical and mental health, including programs addressing mental well-being and responsible digital work-life balance, where applicable. This commitment reflects our dedication to fostering a fair, supportive, and sustainable working environment.

Health, Safety, and Well-Being in the Workplace

Northern Data is committed to providing a safe, secure, and health-promoting working environment in accordance with our Global Health & Safety Policy. We aim to prevent work-related injuries and illnesses by proactively identifying, assessing, and mitigating workplace risks and hazards.

To achieve this, we ensure that:

- » All employees and managers are required to comply with applicable health and safety laws, regulations, policies, and procedures at their respective locations.
- » Managers are responsible for ensuring that their teams receive appropriate and regular health and safety training.
- » Local senior management is responsible for establishing and maintaining systematic health and safety management processes, with a focus on risk prevention at the source and continuous improvement.

We also recognize the importance of mental health and psychological well-being and promote a workplace culture that supports both physical and mental health.

Environmental Responsibility

Northern Data recognizes that environmental impacts can directly affect human rights, including the rights to health, water, and a safe living environment. We therefore integrate environmental responsibility into our business practices by addressing climate impacts, energy efficiency, water stewardship, waste reduction, and responsible use of resources. We work with business partners to promote environmentally responsible practices and to minimize negative impacts on local communities.

Data Privacy and Protection

We are dedicated to complying with all applicable privacy laws and regulations. Our Global Data Protection Policies provide a comprehensive framework to ensure we uphold this commitment, safeguarding the privacy and security of personal data across all our operations. Our digital governance expanded to ensure AI transparency, risk assessments, and the right to human review for high-risk automated decisions, in accordance with the EU AI Act.

4.2. Human Rights in our extended Supply Chain

We expect suppliers and business partners to respect human rights and environmental standards consistent with this Policy and our Supplier Code of Conduct. We recognize that risks may be elevated in certain regions or industries and therefore apply a risk-based approach to supplier engagement.

Where adverse impacts are identified, we seek to work with suppliers to implement corrective actions. In cases of serious or persistent violations, Northern Data reserves the right to reassess or terminate the business relationship.

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Human Rights Due Diligence Framework: A Comprehensive, Risk-Based Approach

At Northern Data, the protection and promotion of human rights across our entire supply chain is of paramount importance. As a German based company, with subsidiaries in the Netherlands, UK, Norway, Sweden, Ireland, Portugal, Canada and the United States, we are deeply committed to not only implementing robust human rights due diligence procedures but also ensuring that we fully comply with local laws, regulations and emerging international standards in every country where we operate. This is a key priority for us, and we are currently in the process of establishing comprehensive due diligence mechanisms and risk assessments to ensure we meet these obligations.

Our approach is aligned with the [OECD's Due Diligence Guidance for Responsible Business Conduct](#) and is tailored to the specific operational contexts, risks, and legal requirements of the regions in which we operate. By continuously evaluating our potential to cause, contribute to, or be directly linked to any adverse human rights impacts, including those arising from digital systems, AI applications, and technology-enabled services, we ensure that our practices not only evolve in response to emerging global risks but also respect and adhere to local laws and expectations.

We recognize the importance of closely monitoring the effectiveness of our actions, and we are establishing systems to incorporate both

internal and external feedback. These systems will utilize qualitative and quantitative indicators, including AI impact metrics and supplier remediation outcomes, ensuring that we can refine and improve our human rights efforts while maintaining a high level of accountability.

Our Human Rights Due Diligence Program, structured in alignment with industry best practices, will consist of the following key steps:

- 1. Governance:** Define and embed clear human rights standards across all our operations and supply chain. We ensure that these standards comply with both international guidelines and local laws, and reflect digital, AI, and sector-specific due-diligence expectations, and we monitor their effectiveness on an ongoing basis.
- 2. Risk Identification and Assessment:** Conduct thorough risk assessments of our suppliers, taking into account factors such as geography, industry, and volume, and digital/AI system impacts, while ensuring that we comply with country-specific human rights concerns and legal frameworks.
- 3. Prioritization:** Based on our risk analysis, we prioritize sectors and suppliers that present the highest risk, allowing us to implement targeted interventions that comply with local legal requirements where the risks are most significant.
- 4. Prevention and Mitigation:** Work diligently to ensure human rights standards are consistently upheld across our global supply chain. We implement preventive, mitigating, and remedial measures,

including requiring suppliers to participate in corrective-action plans for verified human-rights or environmental issues, while ensuring full legal compliance in each jurisdiction.

5. Communication: Maintain a commitment to transparency by publicly sharing our efforts, progress, and challenges in our Human Rights Due Diligence. This reporting will be aligned with our internal standards and the specific legal obligations of each country where we operate, and reflect due-diligence performance metrics, supplier remediation progress, and emerging sectoral reporting standards.

Each of these steps is supported by detailed programs, frameworks, and processes designed to ensure effective implementation of our human rights risk management strategy. Moreover, we provide accessible grievance mechanisms for our employees, business partners, and stakeholders, allowing concerns to be raised without fear of retaliation. Grievances can be submitted confidentially, and mechanisms now also cover issues arising from digital systems and AI applications, where relevant, and we handle them with the most seriousness and care.

By aligning our operations with local legal requirements and fostering a culture of human rights awareness, we ensure that Northern Data is equipped to uphold the highest standards of responsibility and accountability across every region we operate. This holistic approach empowers both our employees and partners to support human rights at every level of our organization and across all operational, digital, and supply-chain activities.

6 Reporting, Grievance Mechanisms, and Remedy

Northern Data provides accessible and confidential channels for employees, suppliers, and other stakeholders to raise concerns related to human rights, compliance, or ethical conduct. Reports may be submitted anonymously through the Whistleblowing System or via email to compliance@northerndata.de

All reports are handled confidentially and without retaliation. Where adverse human rights impacts are identified, Northern Data seeks to provide or support appropriate remediation and corrective actions, either directly or in cooperation with relevant business partners.

Whistleblowing System: [northerndata | Home](#)

7 Roles and Responsibilities

Role	Responsibilities
Executive Management	» Overall responsibility for human rights strategy and oversight.
Compliance and Sustainability Functions	» Development, implementation, and monitoring of this Policy and related due diligence processes.
Human Resources	» Ensuring fair labor practices and employee-related measures.
Procurement	» Integrating human rights expectations into supplier selection and management.
Local Management	» Implementing the Policy at site and subsidiary level.
Employees	» Acting in accordance with this Policy and reporting concerns.
Suppliers and Business Partners	» Complying with applicable human rights standards and contractual commitments.

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Monitoring and Improvement

Northern Data regularly reviews the effectiveness of its human rights approach and updates this Policy as necessary to reflect evolving risks, stakeholder expectations, and international standards. Continuous improvement is a core element of our commitment to responsible business conduct.

