



# OUR CSR POLICY

## Corporate Social Responsibility

# CSR POLICY

## No. 01 – Environmental Responsibility

- **Proactive waste management**



- "SuperDrecksKëscht fir Betriber" quality label since 2018,
- Environmental management system and ISO 14001 Certification since 2019.

- **Reducing the carbon footprint**

- Annual carbon footprint,
- Environmentally responsible installation and use of datacentres,
- Reduction of CO<sub>2</sub> emissions,
- Carbon offsetting.



- **Purchase and use of eco-friendly and local consumables**

- **Provision of offset services and use of biodegradable products**

- **Rational use of non-renewable resources**



- Green electricity,
- Rainwater collection,
- Optimisation of travel.



## No. 02 – Social Responsibility

- Diversity and inclusion all along the career of employees,
- Respect for human rights and ethical commitment,
- Communication, awareness campaigns and continuous training,
- Sponsoring, extra-professional and committed activities.



## No. 03 – Economic Responsibility



- Provision of quality secure services,
- Promoting local and fair trade,
- Funding and support for local associations,
- Chosen and monitored collaboration,
- ReInjection of wealth towards developing areas.



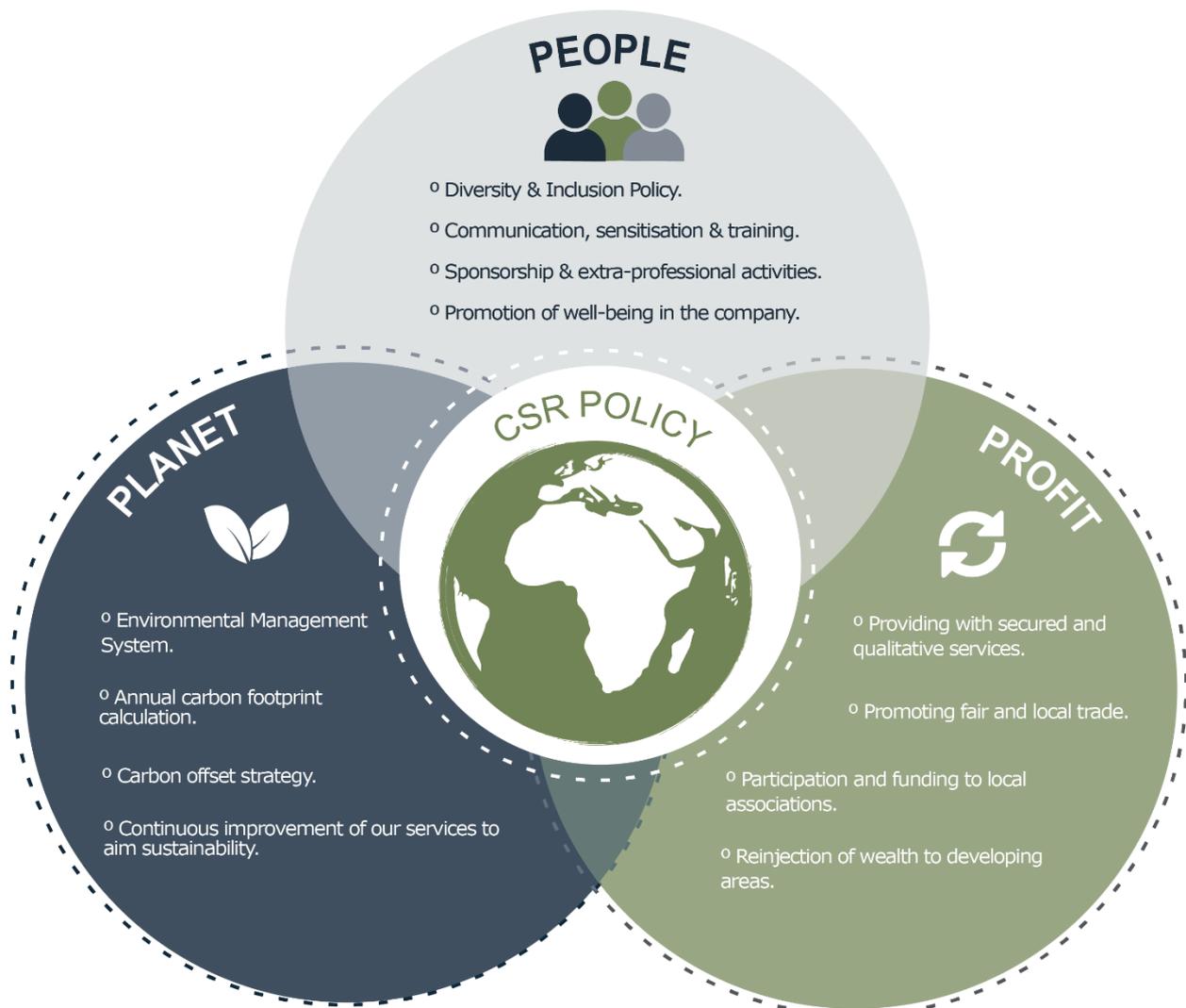
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## Working for a sustainable society



Each company is responsible for the environmental and social impacts resulting from its decisions and activities. Lab Luxembourg S.A. adopts a transparent and ethical behaviour with regard to the integration of its social, environmental and economic responsibilities in its daily management. The CSR (Corporate Social Responsibility) policy and strategy are part of the company's Vision, Mission and Values. Our goal is doing more than limiting our negative impacts; we want to grow on a long-term basis in harmony with people and the planet and create a positive work environment where all cultures can flourish by fostering trust, respect and understanding. In addition to this, the company considers the needs of its entire value chain and combines them with its own.





# 1 We are committed to being environmentally friendly

## 1.1 Standards, certifications and labellisations

Lab Luxembourg S.A. is committed to a program of Corporate Social Responsibility as a member of the community. In this context, the company refers to the various standards in order to be compliant and ensures that it is certified and labeled to guarantee its activities.

### **ISO 14001 certification**

Environmental issues are taken into account in decision-making and the company undertakes to continuously improve the Environmental Management System (EMS), in accordance with ISO 14001: 2015 compliance requirements. This international standard defines the requirements relating to an environmental management system that an organisation can use to improve its environmental performance. Preparing for the certification audit is the opportunity to review our structure and consistency of all the actions the company is taking to make it more environmentally friendly, such as those described below.

As a result, Labgroup is working on maintaining its commitments and actions to ensure that it continues to meet the expectations of the certification.

## 1.2 Proactive waste management – recycle, reuse, rethink

Labgroup has received the 'SuperDrecksKëscht fir Betriber quality label' for its ecological waste management. It is granted to companies, which contribute to environmental protection through modern waste management. This label is certified according to the international standards ISO 14024:2000. This includes among other things, a monitoring procedure and requirements that must be met and maintained by the controllers.

As a provider of archiving and destruction services (physical and digital), Labgroup is concerned about its waste management process. The implementation of the environmental waste management plan is monitored and evaluated annually, based on specific criteria such as the implementation of waste prevention and reduction measures, the creation of a visible and accessible collection point for all employees, etc. In addition, Labgroup has obtained a permit to trade or broker waste by the Ministry of Ecology. We apply sorting practices in our state-of-the-art building and throughout our archiving process, especially during our destruction process (separation of different papers and plastics).

The Management has also decided to offer reusable water bottles to all employees in order to stop the use of plastic cups or bottles, as well as erasable and digitizable notebooks to reduce the consumption of waste within Labgroup.

## 1.3 Reducing the carbon footprint

Labgroup has undertaken to calculate the volume of carbon emissions associated with its activities, to identify measures to reduce these and to implement strategies to reduce environmental impact. As a result, a Calculation of Carbon Footprint is carried out once a year to monitor our emissions and improve our environmental policy.

Secondly, in addition to ensuring that we consume natural resources in a reasonable way, as explained in section 1.4, we are hosted in the state-of-the-art Luxconnect datacentres and are committed to the following:

- A combination of energy-efficient storage and servers have made it possible to store data more economically than traditional solutions;
- The datacentres are supplied with and use only 100% renewable energy;
- The high performance of the datacentres allows a reduced energy consumption for air-conditioning, in particular thanks to a partnership between the Bissen datacentre and the neighbouring company (LuxEnergie) to reuse the heat produced by the latter during its own pellet production (thermal energy recovery and/or heat energy recovery).

The environmental objectives defined in our Environmental Manual are also monitored through key performance indicators, which have been put in place.



Finally, to maximise the results of our efforts, a strategy of offsetting the company's current carbon emissions is in place. Together with our trusted partner, trees capturing CO2 and producing oxygen are planted in impoverished regions, thus also enabling local people to improve their living conditions.

## **1.4 Rational use of non-renewable resources**

With regard to non-renewable resources, Labgroup has implemented certain energy saving measures such as increasing the energy efficiency of IT equipment. The Digital Transition Hub is fully equipped with motion sensors and low-energy lights (LED), thus reducing energy consumption. In addition, light intensity troll switches are installed in the offices.

To ensure a reasonable use of resources, we use green electricity purchased from our supplier Enovos and host a solar panel system on the roof of the DTH to contribute to the production of green energy. Charging stations are also available for electric vehicles.

We also pay attention to our water consumption: a rainwater collector is installed in the DTH, and the collected water is used for the toilets and the watering of the outdoor plants. In addition, the design of the building and the installation of active slabs have reduced air-cooling and gas consumption.

A further step towards reducing energy consumption is also the optimisation of travel. Firstly, the move and regrouping of all assets and staff at the new "Digital Transition Hub" building meant that no more trips were made between our various locations, resulting in a 30% saving in the number of kilometres travelled per year by the Labgroup fleet. In a second phase, the company has studied the possibility of switching to a fleet entirely composed of electric vehicles. This is one of the short-term objectives in Labgroup's strategy.

## **1.5 Biodegradable and compensated products**

As a leading provider of document archiving services, we supply hundreds of thousands of small archive boxes and tens of thousands of medium archive boxes each year. As a result, we decided to reduce the environmental impact of our packaging by using brown corrugated 'Kraft' archive boxes (previously white and coloured) made from 85% recycled fibre and produced in one colour. Our packaging is 100% recyclable, 100% renewable and 100% biodegradable.

Thanks to the carbon offset project currently under development, our customers will be able to benefit from offset services (such as archive boxes whose production, transport and storage will be offset).

We also offset the production vehicle fleet and the company vehicle fleet through our partnership with the leasing company. The CO2 production (170 tons in 2020) of Labgroup's vehicles is fully offset through the actions of the Luxembourg organisation "Graine de Vie" by planting trees in Madagascar. This planting was accompanied by actions to raise awareness among local populations and is part of a broader concept of sustainable development.

# **2 We are committed to social responsibility**

## **2.1 Non-discrimination in employment**

The definition of employment principles is essential for every organisation. Labgroup has a policy of diversity and inclusion in its day-to-day work, which applies to its recruitment strategy and all along the employee professional life. Each person is unique and a company has an obligation to accommodate individual differences. Labgroup ensures equal opportunities for people of any gender, age, sexual orientation, religion, ethnicities, people with disabilities and even more. The company provides a working environment that values the contributions of employees with a wide range of knowledge and experience.

Staff should feel involved and respected in their working environment. At Labgroup, we hire employees with reduced working capacity, people with disabilities, as well as seniors and young people such as students, interns and juniors (young people with limited work experience). In addition, the company ensures transparency of vacancies and selects its candidates according to an ethical and responsible procedure.



You can find our [Diversity and Inclusion Policy here](#).

## **2.2 Respect for human rights and ethical commitment**

Labgroup strives to respect human rights in their entirety and is ethically committed to employees and all those who may interact with the company.

Labgroup does not tolerate any form of harassment and/or violence within the company, by or coming from external suppliers or clients. It is everyone's responsibility to make sure such behaviour does not happen. When talking of harassment, we mean any behaviour from one or more person(s) with the aim or effect of violating the dignity of Labgroup employees or any other person, affecting their health and/or creating a hostile work environment. Labgroup ensures the implementation of a prevention and management plan on this subject, as well as regulatory compliance related to the "Whistleblower" law (Law of May 16, 2023 transposing Directive (EU) 2019/ 1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law). In addition, the company is committed to raising awareness among all of its employees.

Our clients are also made aware of these values, and the general terms and conditions of sale specify the need to respect our employees: no inappropriate behaviour, whether moral, physical or sexual harassment, or inappropriate speech and/or gestures, is tolerated within the company when the employees travel to client organisations and/or in exchanges between the different parties.

Finally, by carefully selecting our suppliers, we ensure that we proactively contribute to the fight against:

- all forms of illegal labour,
- all forms of forced labour in accordance with the laws in force,
- child labour in accordance with the laws in force,
- all forms of discrimination in employment in accordance with ILO Convention No. 111.

## **2.3 Corporate communication and awareness trainings**

Labgroup is committed to providing each employee with appropriate and regular training and updating of their knowledge to develop their skills and ensure that their qualifications match those needed to do their job.

Labgroup has set up a community website, which is accessible to staff. Internal communications are regularly published on this website, which facilitates exchanges between all departments. An awareness and training publication tool is also used to sensitise employees. The contribution of each employee is essential to reduce the environmental impact. Labgroup has decided to implement awareness campaigns to inform employees about good environmental practices (e.g. good energy use habits, turning off lights when not needed), including waste management, good recycling practices, etc.

The company regularly organises internal events such as "A morning in the life of..." or the Easter treasure hunt, concepts that encourage team spirit and strengthen cohesion between employees, with the aim of getting to know each other better and have a better understanding of the daily tasks. The corporate social network Yammer has also been introduced within Labgroup to encourage exchanges between employees, whether they are present at the Grass site, working remotely, based in other institutions or even countries.

## **2.4 Sponsoring of extra-professional and committed activities**

Labgroup has been supporting various local associations for many years and regularly makes donations to support good causes. Many Labgroup employees are members of an association, belong to a sports club or work as volunteers in a humanitarian organisation. These commitments outside of the working environment deserve to be valued! Therefore, the management has decided to support employees who participate - whether it is a cultural, sporting, ecological or charitable activity - in these extra-professional activities.

The aim? To encourage employees who invest time and energy in a good cause (e.g. the Echternach Triathlon, ING Marathon, Relais pour la Vie, the Partage Luxembourg association, etc.).



In addition, to introduce employees to good health and biodiversity practices and strengthen the links between teams, extra-professional activities are also organized during working hours: sports lessons, yoga, courses and practical workshops beekeeping and vegetable gardening.

### **3 We set economically responsible targets**

#### **3.1 Encouraging fair and local trade**

Labgroup promotes fair trade and local products and encourages employees to do the same. For example, the company offers its customers Fairtrade chocolate squares, but also candies made by a responsible company and packaged in reusable boxes. The management also offers Fairtrade, local and/or organic products to employees on the occasion of various annual events (such as Christmas), such as cosmetic products and ecological bags for preserving fruit and vegetables (in order to avoid the use of plastic bags in grocery shops), or food products made in Luxembourg.

#### **3.2 Chosen and monitored partners**

We select our suppliers according to socially responsible and ecological criteria. For example, we use a cleaning company that uses environmentally friendly cleaning products. As a rule, we check the quality of products and services and the implementation of safety policies provided by third-party companies. All employees are made aware of the need to seek out suppliers who match our values and who comply with the selection criteria. 95% of our purchases are made from local, Luxembourg and cross-border suppliers (from Belgium, France and Germany).

In addition, before entering into a relationship with any partner whatsoever (customers, suppliers, associations, etc.), Lab Luxembourg S.A. verifies the reliability and integrity of the organisations, in particular, by sending a "KYC" document to customers or a "Due Diligence" questionnaire to suppliers.

### **4 Appendix: schematic policy**

Management, IMS Document, Policies