SGL DATA ETHICS

Version 3.0

TABLE OF CONTENTS

›› 1 – INTRODUCTION

In this policy, we define Scan Global Logistics approach to data ethics pursuant to section 99 d of the Danish Financial Statements Act. Data ethics concerns the ethical considerations which we as a company must take into account when we use data and new technologies globally in Scan Global Logistics. Data ethics goes beyond compliance with data privacy laws. We comply with all legal requirements but acknowledge and respect that our use of data (both personal data and nonpersonal data) may create risks for the users that applicable laws do not cover. We manage these risks by adhering to the principles described below.

›› 2 – SOURCES OF DATA

In Scan Global Logistics, we process various types of data, including

- Personal data about job applicants, employees, users of our digital services, and business relations
- Non-personal data about our operating assets and other operations. We strive for high data ethics standards for the use of both personal and non-personal data.

›› 3 – USE OF TECHNOLOGIES

We use a variety of technologies when processing data.

›› 4 – DATA ETHICS PRINCIPLES

We commit to the following data ethics principles:

4.1 Transparency and openness

We uphold transparency and openness concerning our use of data. We ensure that our data ethics principles remain clear, understandable, and easily accessible.

4.2 Use of data

Data is an important asset of our business. We have high standards in relation to where we collect data and how we use the data:

- We set high standards on ourselves in collecting data from our assets and other sources
- We set high demands on our partners from whom we receive data. We encourage partners to work towards determining a set of data ethical principles for their own company.
- We refrain from extensive collection of data which may be characterised as data-driven surveillance.

4.3 Accountability

All data collection involves human decisions. Therefore, we strive to implement mechanisms to control the context in which data is collected, the systems that are used for data processing, and the methods for ensuring data quality.

We acknowledge that data and systems can be misused or used for unintended purposes. We assess and document permissible uses of our data and systems and take measures to avoid impermissible uses.

4.4 Processes and policies

We will develop additional policies and procedures to ensure that we comply with the above-mentioned principles.

⟫ 5 – GOVERNANCE AND REPORTING

Each year we will account for this policy in accordance with section 99 d of the Danish Financial Statements Act.

⟫ 6 – APPROVAL

This policy was approved by the Executive Committee of Scan Global Logistic A/S on 16 March 2022.