

Nilfisk Data Ethics Policy – February 2024 - Legal obligations and ethical responsibilities of Nilfisk Holding A/S and Nilfisk A/S as corporations subject to the special reporting requirements in sec. 99 of the Danish Financial Statements Act (LBK 838, 08/08/2019) - **Joseph Simon, V.P. Compliance, Corporate Affairs**

Introduction:

This Nilfisk Data Ethics Policy addresses the reporting requirements of sec. 99(d) of the Danish Financial Statements Act. The global Nilfisk Group's use of technology and data adheres to the 10 Central Values and Principles of responsible data ethics described by Denmark's Data Ethics Council, e.g. ensuring transparent use of data and protecting the private life of individuals, and does not generate risks raised by the Council, e.g. producing addictive software or engaging in online censorship. The information herein only involves aspects of data ethics relevant to Nilfisk's actual use of data, which generates few if any of the dilemmas intended to be addressed by sec. 99(d), and few of the social issues targeted by that section, e.g. public welfare, equality and individual freedom are not impacted.

Nilfisk's Code of Conduct, addressing topics such as data privacy and discrimination, and its core Integrity Policy, help ensure the ethical use of data. Our data security processes and actions comply with legal requirements, e.g. the European Union's General Data Protection Regulation (GDPR), and applicable global industry standards, and thereby with responsible data ethics. Actions and processes described below involve written and unwritten rules, guidelines and standard operating procedures (SOPs), which are part of Nilfisk's constantly developing governance framework.

Personal Data:

The majority of personal data used by Nilfisk and covered by data ethics involves employees' personal data, used in Nilfisk's role as an employer complying with applicable laws and collective bargaining agreements, and providing benefits to employees, such as healthcare and special remuneration in certain countries.

Nilfisk uses a much more limited volume of third party personal data involving the sale of Nilfisk cleaning equipment and related services and cleaning solutions, and Nilfisk's purchase of goods and services from suppliers:

- Names and contact details of contact persons at B2B suppliers and customers dealing with, e.g. orders, deliveries, invoicing, payments, service and maintenance, contract negotiations;
- Consumers who are customers, e.g. contact details and information about their purchases and related service and maintenance.

Nilfisk's compliance with applicable data privacy laws governing the use of personal data, e.g. GDPR, also complies with key requirements of responsible data ethics, e.g. using only the necessary volume of data and only using it for necessary purposes, storing data securely, sharing personal data only on a need-to-have basis.

Marketing:

Nilfisk uses data to market its products and services to prospective and existing customers within the limitations imposed by applicable laws that adequately address ethical issues, e.g. always allowing recipients to opt-out of future contact. Nilfisk only obtains B2B customer databases from reliable, professional commercial sources.

Technology, operational and related data:

Nilfisk offers customers the option of tracking their machines' operation with devices transmitting data on how, when and where machines are used, in order to advise customers on more efficient operation, including autonomous machines designed to offer cost-effective cleaning of large areas. Nilfisk also uses such data to develop new solutions.

Production and logistics data is used to respond to customer inquiries and to provide data required by regulators, customers, standards and other relevant organizations, and logistics service suppliers.

Business partner data:

Nilfisk uses the financial, CSR and legal compliance data it requests from its business partners to determine whether it can do business with them and under which conditions. Nilfisk does this to protect its legal and commercial interests, and to ensure that it lives up to its ethical goals and standards. Financial data is also used for invoicing and payment.

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Societal impact:

The key societal impacts of Nilfisk's use of data and technology are in its roles as a responsible employer, an innovator developing new products and services, and a reliable business partner of its suppliers and customers, in particular by supplying safe, technologically advanced and environmentally friendly machines and cleaning solutions, and services.