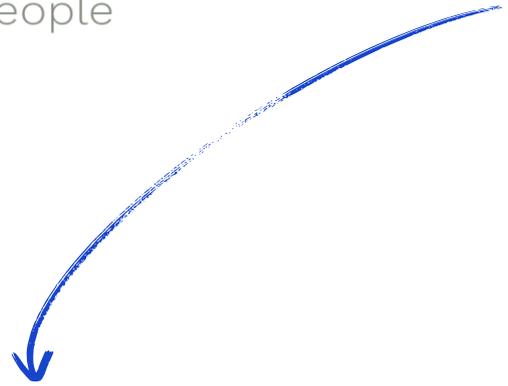


**SUSTAINABILITY IN
PROCUREMENT POLICY**

Table of Contents

1. Our Policy Statement.....	3
2. Our Purpose.....	3
3. Our Scope.....	4
4. Our Commitment to Sustainability in the Supply Chain	4
5. Our Objectives	5
5.1.1. Objective 2: Supplier monitoring.....	5
5.1.2. Objective 1 – Adherence to <i>Supplier Code of Conduct</i>	6
5.1.3. Objective 3: Environment-friendly procurement	7
5.1.4. Objective 4: Social responsibility.....	7
5.1.5. Objective 5: Diversity & inclusion	7
5.1.6. Objective 6: Economic viability & business ethics	8
6. Governance and Allocation of Responsibilities.....	9
6.1. Procurement governance.....	11
6.1.1. Category Contracts.....	11
6.1.2. Category Managers	11
6.1.3. Procurement users and approval	11
6.1.4. Review team	12
6.1.5. Signatory levels & materiality	12
6.1.6. Procurement guidelines outside categories	12
6.2. KPIs on SPP Implementation	13
6.2.1. KPI 1: Supplier Engagement	13
6.2.2. KPI 2: Procurement Processes.....	14
6.2.3. KPI 3: Performance Monitoring and Evaluation.....	14
6.2.4. KPI 4: Compliance and Policy Review Mechanism	14
7. Grievance, Inquiries and Feedback Mechanism	15

1. Our Policy Statement



As Mannaz A/S, we recognize the importance **of integrating sustainability principles into our procurement practices** in alignment with the European Union (EU) regulations and international standards on corporate sustainability.

Every year, we deliver over 1,200 programs that contribute to developing more than 15,000 business executives, managers, project leaders, and specialists from some of the world's largest and most complex organizations. Empowering organizations with sustainable business thinking and competency development, we enable companies to create greater positive impact for the economy.

We are dedicated to achieving our **Sustainability Ambition 2025 & our ESG Targets 2026-2030** through continuous improvement of our sustainability efforts, underpinned by the United Nations Sustainable Development Goals (SDGs) and our commitment to the Ten Principles of UN Global Compact, EU regulations, and other relevant international standards (please find the complete reference list in Appendix 3). Additionally, we use ISO 20400:2017 - *Sustainable Procurement Guidance* as a reference for implementing best procurement practices.

This *Sustainability in Procurement Policy (SPP)* outlines the **purpose, scope, objectives, governance** and **KPIs** we adopt in our procurement decisions.

2. Our Purpose

The purpose of SPP is to minimize adverse environmental, social, and economic impacts associated with our procurement processes while promoting sustainability across our supply chain and maximizing value for our stakeholders.

Mannaz values the importance of partnering with suppliers who adhere to sustainable procurement standards and actively work to reduce the negative environmental & social impacts of their operations.

Mannaz SPP is the core policy document that guides our procurement decisions in Mannaz A/S and the basis for the environmental and social clauses in the **Supplier Code of Conduct** (see Appendix 1). Additionally, an integral part of this journey is our commitment to

promoting environmental stewardship, social responsibility, good governance, and economic viability throughout our supply chain.

3. Our Scope

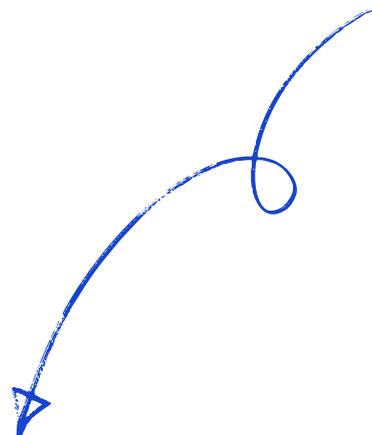
This policy applies to all significant procurement activities conducted by Mannaz A/S in all business operations across all legal entities & locations in Denmark, Sweden & UK. It applies to all Mannaz employees, managers, and business partners. It encompasses the procurement of goods, services, and work from external suppliers and our associate network, covering both existing and new products, as well as service providers.

4. Our Commitment to Sustainability in the Supply Chain

We are dedicated to purchasing goods & services from suppliers who can demonstrate compliance with environmental and social best practices that we adhere to.

Mannaz A/S is committed to addressing our impact on key sustainability issues in our industry¹ by improving our environmental and social performance and mitigating environmental and social risks in our supply chain. The **industry-specific key sustainability issues** are:

- Energy consumption and GHG emissions
- Materials & Waste
- Employee Health & Safety
- Working Conditions
- Social Dialogue
- Career Management & Training
- Discrimination & Harassment
- Corruption
- Responsible Information Management
- Supplier Environmental Practices
- Supplier Social Practices



¹ Management consultancy (Ref: Ecovadis Methodology)

5. Our Objectives

Our commitment extends to building a more sustainable supply chain by establishing a variety of relevant and impactful targets.

Our sustainability in procurement practices & expectation towards our suppliers are divided into the following **six key objectives** covering environmental, social & governance areas.

5.1.1. Objective 1: Supplier monitoring

As part of implementing a comprehensive supply-chain monitoring system through *EcoVadis* platform, **100% of active suppliers with spend in the past 12 months will be screened and risk-rated annually** using a verified sustainability risk-assessment methodology and the ***EcoVadis IQ Plus*** tool. This excludes NGOs and small local suppliers that cannot currently be identified in the *EcoVadis* system.

As a second mechanism, Mannaz will also closely evaluate & monitor **key suppliers** across all its procurement categories with annual **spend above 100,000 DKK** using industry specific **supplier questionnaires *EcoVadis Vitals*** designed to assess their environmental, social & governance sustainability practices. These questionnaires will also gather information on the environmental impact of their products and services, and their compliance with relevant EU directives, international standards, guidelines, and applicable third-party ratings (Appendix 3).

Risk assessment process with ***EcoVadis Vitals for key suppliers*** will be rolled out as follows:

Year 1 – 2025 - **5%** of key suppliers *screened & risk rated (revised target from 2024)*,

Year 2 – 2026 - **60%** of key suppliers screened & risk rated,

Year 3 – 2027 - **80%** of key suppliers screened & risk rated,

Year 4 – 2028 - **90%** of key suppliers screened & risk rated.

For suppliers already listed in the *EcoVadis* database with a verified [EcoVadis Scorecard Rating](#), Mannaz will request and accept this rating in place of *EcoVadis Vitals*, as it provides a more detailed and comprehensive sustainability performance assessment.

As a third-level review and risk-prevention mechanism, Mannaz may use the advanced **EcoVadis Ratings assessment** for key suppliers who continue to show a high-risk score in the *EcoVadis IQ Plus* screening despite all previous mitigation actions. *EcoVadis Ratings* provide a comprehensive, independently verified evaluation of a supplier's sustainability performance, enabling deeper insight into environmental, social, and ethical risks and supporting more informed procurement decisions.

On top of it, based on the EcoVadis assessment and our internal risk categorization, relevant suppliers will be engaged in corrective actions and capacity-building initiatives where needed.

5.1.2. Objective 2 – Adherence to Supplier Code of Conduct

Our aim is to ensure that **key suppliers with annual spend above 100,000 DKK** comply with both environmental practices and social practises & that they have signed the **Mannaz Supplier Code of Conduct** (Appendix 1) starting from the first year of the adoption of this SPP & in line with the following roll-out plan:

Year 1 - 2025 - **10%** key suppliers signed the *Mannaz Supplier Code of Conduct* (revised target from 2024),

Year 2 – 2026 - **40%** key suppliers signed the *Mannaz Supplier Code of Conduct*,

Year 3 - 2027 - **60%** of key suppliers signed the *Mannaz Supplier Code of Conduct*.

Year 4 - 2028 - **80%** of key suppliers signed the *Mannaz Supplier Code of Conduct*.

Year 5 - 2029 - **90%** of key suppliers signed the *Mannaz Supplier Code of Conduct*.

Remaining suppliers with annual spend lower than 100k DKK are also obliged to adhere to *Mannaz Supplier Code of Conduct*. We expect suppliers to minimize environmental risks and manage their impact concerning resource use, energy consumption, GHG emissions, consumption of raw materials and chemicals, and waste disposal practices guided by the applicable national regulations, EU laws and directives, international regulations and other international standards, initiatives and principles such as the Ten Principles of UN Global Compact, OECD guidelines for multinational enterprises and/or ISO 14000, as applicable.

Additionally, whenever possible, Procurement Leads and Category Managers will follow best practice for newly enrolled suppliers by attaching the *Supplier Code of Conduct* to original contracts for large suppliers with an expected annual spend above 100,000 DKK.

Furthermore, we aim to ensure that all **active business associates**, who delivered consulting and learning services on behalf of Mannaz within the last 12 months comply with our environmental and social standards and signed the *Mannaz Code of Conduct*. Because they represent Mannaz in their work with our clients, we apply the same high Code of Conduct requirements to them as we do to our direct employees.

Year 1 – 2024 – **10%** active & delivering associates signed the *Mannaz Code of Conduct*,

Year 2 - 2025 - **60%** active & delivering associates signed the *Mannaz Code of Conduct*,

Year 3 – 2026 - **80%** active & delivering associates signed the *Mannaz Code of Conduct*,

Year 4 - 2027 - **95%** active & delivering associates signed the *Mannaz Code of Conduct*.

5.1.3. Objective 3: Environment-friendly procurement

Mannaz will prioritize the procurement of **environmentally friendly**² products and services from new and existing suppliers that minimize resource consumption, reduce waste generation, use renewable energy, and mitigate negative environmental impacts.

5.1.4. Objective 4: Social responsibility

The social responsibility clauses from *Mannaz Supplier Code of Conduct* (Appendix 1) require the Mannaz suppliers to **respect human rights, labour rights, and ethical business practices** in line with the applicable national regulations, EU laws and directives, as well as Ten Principles of UN Global Compact.

5.1.5. Objective 5: Diversity & inclusion



Ensure **diversity, inclusion, and fair labour practices** among suppliers, guided by the relevant EU regulations and international guidelines on **non-discrimination**, equal opportunities, and fair wages in procurement decisions.

² The definition of ‘environmentally friendly products and services’ are based on the EU Green Claims Directive to avoid greenwashing.



Prioritise the procurement from **local communities**, small and medium-sized enterprises in procurement decisions where applicable to foster sustainable economic development locally in line with social equity principle.

5.1.6. Objective 6: Economic viability & business ethics

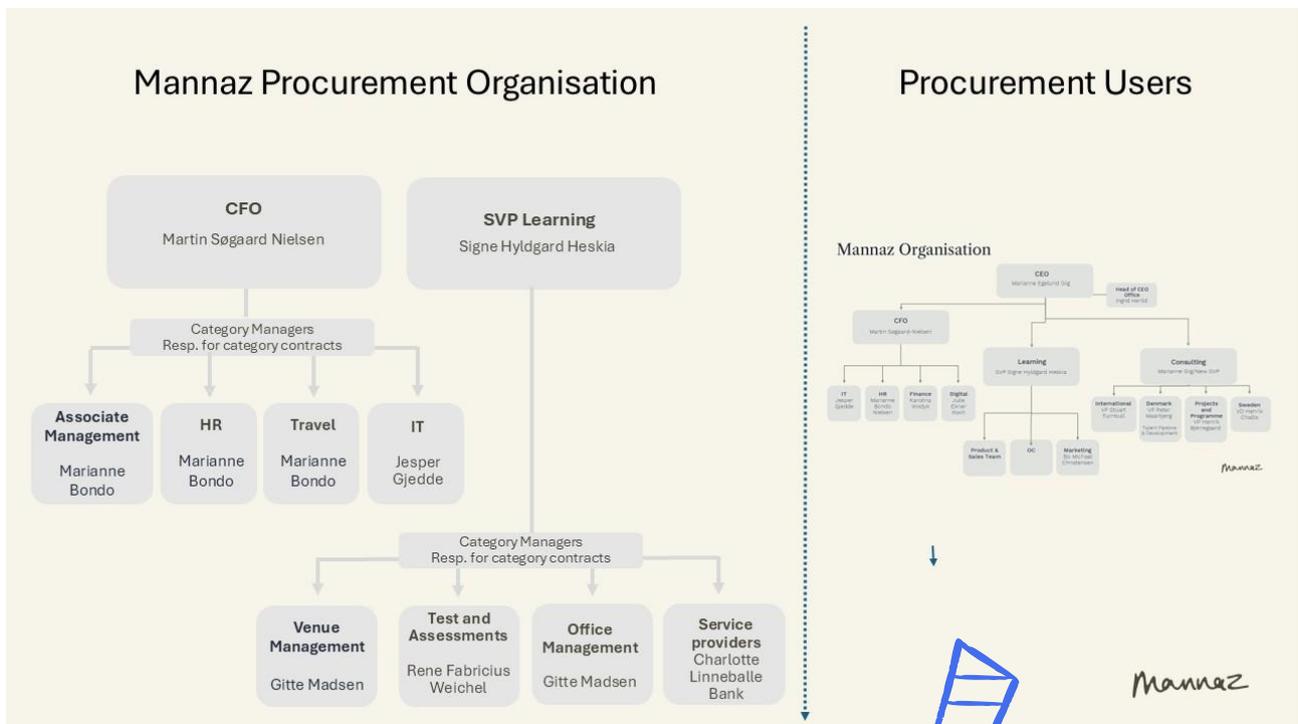
Seek value for money by considering the total cost of ownership, life cycle costs, and long-term sustainability benefits in procurement decisions, informed by the relevant international standards and best practices (Appendix 3).

Ensure fair and transparent competition requirements among suppliers, adhering to EU and international law and regulations on **competition, corruption, fraud, conflict of interest, and ethical business conduct** as outlined in *Mannaz Code of Conduct* (Appendix 2).

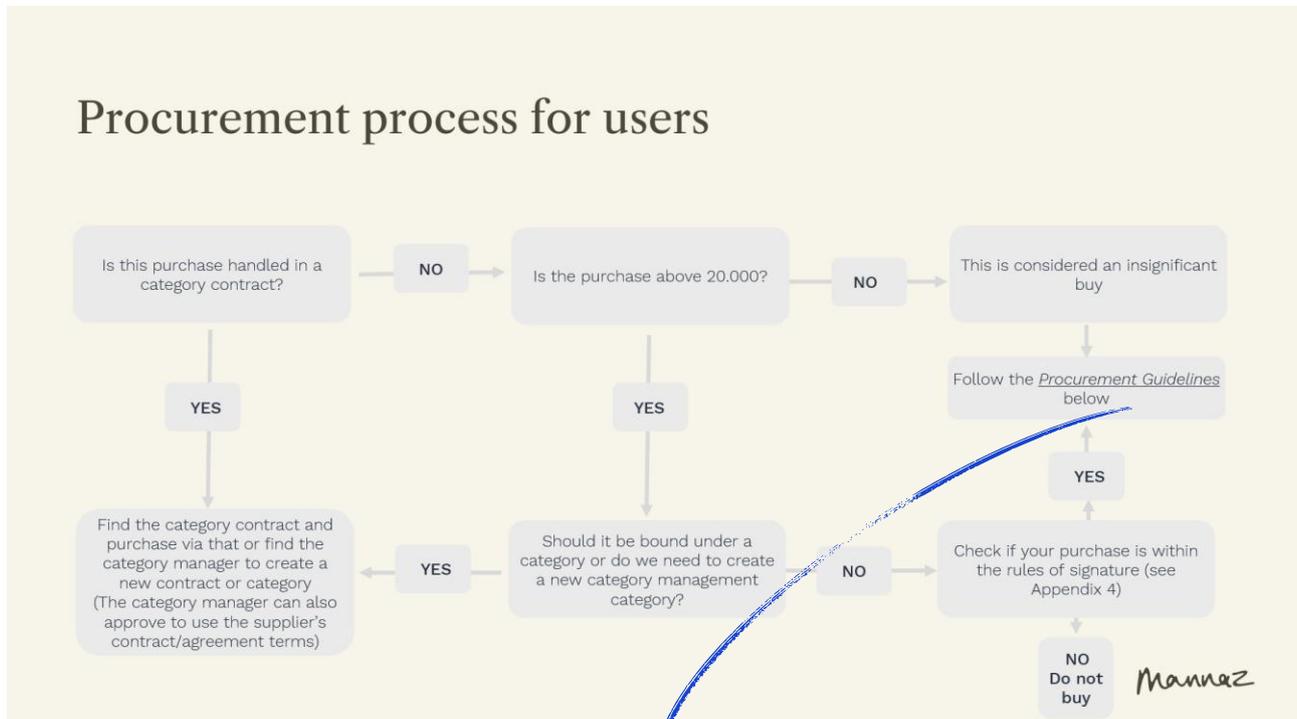
6. Governance and Allocation of Responsibilities

Mannaz A/S established clear roles, responsibilities, and accountability mechanisms to implement the SPP as illustrated in the below organigrams.

Organigram 1 – Procurement Organisation & Procurement Users



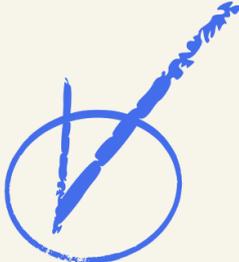
Organigram 2 – Procurement Process for Users



Procurement guidelines

For purchasing goods & services

- Always think circular: Re-use, Re-pair, Up-cycle, Re-cycle
- Always consider if your waste could be someone else's treasure and reach out
- Always ask what a new supplier's take on sustainability is – they might surprise you
- Always choose the more sustainable or ecological solution if you have identical offers / suppliers
- Always keep an open mind for more sustainable options and alternatives
- Always be able to explain why you made a choice – there will be dilemmas, but always know why you chose the way you did
- Always look at sustainability in the broadest sense – Environment, Social, Governance – including avoiding harassment, inequality, and bribery



Mannaz

6.1. Procurement governance

6.1.1. Category Contracts

Procurement of goods & services by Mannaz A/S is based on category contracts signed with suppliers. Category contract is the main contract from a supplier, which is categorised as belonging to one of Mannaz' procurement categories.

In certain cases, it is only possible to purchase services under the supplier's own terms and conditions (for example, with some large international IT providers such as LinkedIn or Meta). In such situations, this approach may be approved by the Category Manager.

In Mannaz we have defined **8 procurement categories** which cover all operational needs of the company across locations:

1. Venue Management (hotels and conference facilities)
2. Associates (external facilitators)
3. Office Management (books, materials, print, office supplies, catering, facilities management, waste management)
4. Professional service providers (marketing agencies, graphic designers and media platforms)
5. Test and Assessments (personality tests and other assessment tools)
6. IT & technology (IT-support, IT-platforms, equipment and services)
7. HR
8. Travel

6.1.2. Category Managers

Category managers are employees who negotiate and / or maintain the contracts under a specific procurement category. The Category managers are responsible for entering into Category Contracts that enforce our Mannaz SPP.

The category managers are supervised by the CFO and the SVP Learning (see org. chart) to ensure the proper execution of the Mannaz SPP.

6.1.3. Procurement users and approval

All employees in Mannaz are eligible to purchase according to the **Procurement process for users** as illustrated on *Organigram 2 – Procurement Process for Users*. The purchase is approved by their respective manager in accordance with our internal signatory system (see Appendix 4: Rules of Signature).

The member of the Mannaz Procurement Organisation shift role to being Procurement Users, when they are just purchasing as any other employee and not performing governance roles.

On client projects, signature level/spend is regulated by client contract specifications, risks and margin as well as the SPP.

6.1.4. Review team

Procurement Leads together with The Category Managers are the review team. Once a year the review team will go through all suppliers and ensure that the purchases are made according to the “Procurement process for users” and that all category purchases have been bought under a category contract.

The review team will look at the following criteria to assess whether a new category must be created or if the purchases should have followed an existing category.

- Frequency of a purchase of one item / service
- Amount of purchase
- Total amount of small purchases annually

6.1.5. Signatory levels & materiality

The signatory levels are connected to the Mannaz organisation as a whole and covers both selling and purchasing (see Appendix 4: Rules of Signature).

Significant vs. Insignificant Purchase

A purchase below 20.000DKK is considered an insignificant purchase. Unless one can foresee or expect that the combined purchase from this supplier year-in-year will be higher than 20.000 DKK.

Regarding the size of the buy: If it is a purchase we charge or use on a client contract, it must follow the guidelines of the client contract, as well as this SPP.

6.1.6. Procurement guidelines outside categories

When purchasing goods or services outside of procurement category contracts described in points 6.1.1-6.1.5. of this SPP, the following **procurement guidelines** need to be followed:

- Always think circular: Re-use, Re-pair, Up-cycle, Re-cycle
- Always consider if your waste could be someone else’s treasure and reach out

- Always ask what a new supplier's take on sustainability is – they might surprise you
- Always choose the more sustainable or ecological solution if you have identical offers / suppliers
- Always keep an open mind for more sustainable options and alternatives
- Always be able to explain why you made a choice – there will be dilemmas, but always know why you chose the way you did
- Always look at sustainability in the broadest sense – Environment, Social, Governance – including avoiding harassment, inequality, and bribery.

6.2. KPIs on SPP Implementation

To operationalise the SPP, Mannaz A/S executes the following steps under three key performance indicators:

6.2.1. KPI 1: Supplier Engagement

Within the first 2 years of the adoption of this SPP:

- 100% of Procurement Organisation including Category Managers received **formal training** on the SPP & *EcoVadis* tools used internally for risk monitoring & risk rating of our suppliers.
- General principles of sustainability in procurement & the SPP document were **shared & communicated** to entire organization acting as buyers.
- The Review Team (Procurement Leads & Category Managers) communicated *Mannaz Supplier Code of Conduct* to at least 60% of the relevant existing and new suppliers that are within the assigned threshold.
- Through supplier sustainability performance questionnaires *EcoVadis Vitals*, the delegated Sustainability Team gathered information and evidence from all Mannaz key suppliers on their environmental and social sustainability performance, capabilities, and commitments as part of the procurement process in line with targets set in point 5.1.1 of the SPP.
- Informed by the supplier sustainability performance questionnaire and industry benchmarks, the delegated Sustainability Team conducted a supply chain sustainability risks analysis covering at least 20% of its suppliers, within 6-8 weeks after receipt.

- The Review Team & delegated Sustainability Team collaboratively and adequately responds to all inquiries, grievances, and feedback from suppliers who contacted Mannaz A/S regarding the SPP.

6.2.2 KPI 2: Procurement Processes

All staff with category management mandate integrate sustainability criteria (*Supplier Code of Conduct*, Appendix 1) into the procurement evaluation criteria, giving due consideration to environmental, social, and economic factors informed by the SPP, the environmental and social clauses in the *Supplier Code of Conduct*, the Ten Principles of UN Global Compact, relevant EU regulations, and international standards. This is done through the Category Contracts process as described in section 6.1. of this SPP.

If the procurement scope is insignificant, all employees should follow the rules for insignificant buy as described in section 6.1.6. Procurement Guidelines of this SPP.

6.2.3 KPI 3: Performance Monitoring and Evaluation

6.3.3 The Review Team is responsible for **integrating the six objectives** into performance monitoring and process evaluations to measure progress toward achieving the objectives of SPP.

6.3.4 The Review Team conducts **annual assessments of suppliers** including their sustainability performance, compliance, and continuous improvement efforts, providing feedback, recognition, and prioritization of suppliers with exemplary sustainability practices.

6.3.5. The Review Team provides **annual reporting of KPIs on SPP** implementation status.

6.2.4 KPI 4: Compliance and Policy Review Mechanism

This SPP is **communicated annually** to all employees, suppliers, and relevant stakeholders and made publicly available on Mannaz A/S 's website.

SPP is **reviewed periodically** every two years to ensure its effectiveness, relevance, and alignment with the relevant EU regulations, international standards, and emerging best practices on sustainable procurement.

7. Grievance, Inquiries and Feedback Mechanism

For inquiries, feedback, or grievances related to this policy, please contact Mannaz Procurement Leads: Senior Vice President of Learning Department, Signe Hyldgard Heskia, shh@mannaz.com or CFO, Martin Søggaard Nielsen, man@mannaz.com



Version 4, March 2026

Appendix

Appendix 1: Mannaz Supplier Code of Conduct

<https://www.mannaz.com/wp-content/uploads/2024/09/Mannaz-Supplier-Code-of-Conduct.pdf>

Appendix 2: Mannaz Code of Conduct

<https://www.mannaz.com/wp-content/uploads/2024/09/Mannaz-Code-of-Conduct.pdf>

Appendix 3: Main Regulations, Standards, and Initiatives

Standard ISO 14000 (International Standard Organisation)

http://www.iso.org/iso/iso_14000_essentials

The ISO 14000 family addresses various aspects of environmental management

Environment

Universal Declaration of Human Rights

<http://www.un.org/Overview/rights.html>

The Universal Declaration of Human Rights (UDHR) is an advisory declaration adopted by the United Nations General Assembly (10 December 1948)

Labor & Human Rights

International Labor Organization's Fundamental Conventions

http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_095895.pdf

The Governing Body of the International Labour Office has identified eight Conventions as fundamental to the rights of human beings at work. These rights are a precondition for 12 the others in that they provide a necessary framework from which to strive freely for the improvement of individual and collective conditions of work.

Labor & Human Rights

Standard OHSAS 18001 (Occupational Health and Safety Assessment Series)

<http://www.ohsas-18001-occupational-health-and-safety.com/index.htm>

OHSAS 18000 is an international occupational health and safety management system specification.

Labor & Human Rights

Foreign Corrupt Practices Act of 1977

<http://www.usdoj.gov/criminal/fraud/fcpa/>

The Foreign Corrupt Practices Act of 1977 (FCPA) prohibits payments, gifts, or Practices Act contributions to officials or employees of any foreign government or government-owned business for the purpose of getting or retaining business.

Ethics

United Nations Convention against Corruption (UNCAC)

<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

The UNCAC is the first legally binding international anti-corruption instrument. In its 8 Chapters and 71 Articles, the UNCAC obliges its States Parties to implement a wide and detailed range of anti-corruption measures affecting their laws, institutions and practices.

United Nations Global Compact (10 principles)

<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of ten principles in the areas of human rights, labour standards, the environment, and anti-corruption:

All themes

OECD guidelines for multinational enterprises

http://www.oecd.org/about/0,2337,en_2649_34889_1_1_1_1_1,00.html

The Guidelines are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide voluntary principles and standards for responsible business conduct in a variety of areas including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition, and taxation.

Standard Global Reporting Initiative's (GRI)

<https://www.globalreporting.org/Pages/default.aspx>

The GRI is a network-based organization, that has set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance.



All themes

Standard ISO 26000 (International Standard Organisation)

<http://www.iso.org/iso/iso26000.htm>

The future International Standard ISO 26000, Guidance on social responsibility, will provide harmonized, globally relevant guidance based on international consensus among expert representatives of the main stakeholder groups and so encourage the implementation of best practice in social responsibility worldwide.

All themes

Carbon disclosure project

<https://www.cdp.net>

CDP is an international, not-for-profit organization providing the only global system for companies and cities to measure, disclose, manage and share vital environmental information.

Appendix 4: Rules of Signature

[Rules of Signature.docx](#)