Eltronic Group
ENGINEERING IMPACT

Data Ethics Policy

Table of Contents

1 Scope

This policy is applicable to all Eltronic Group A/S related companies. If company stipulates policy in compliance with separate law & regulations, this policy can be denied.

2 Basis

Basis for this policy, is always ruling national and international law. There can be specific regulations and "methods" locally, stipulating stricter regulations, in which case, this policy must be assessed and evaluated upon.

3 Purpose

The purpose of this policy is to govern all Eltronic Group A/S related company's similar and within the same framework – as to uphold the highest standard for law obeying governance.

4 KPI'

N/A

5 Ownership

This policy is owned by IT director. The policy is co-governed by Eltronic Group A/S CEO, CFO, COO and any other member of the C-Level Management of Eltronic Group A/S related companies. Including all time members of Board.

6 Evaluation

The policy is to be evaluated no less than within one from the approval date. Hereafter, the evaluation will be performed yearly and marked with new version no.

7 Data Ethics Policy

7.1 Introduction

This Policy describes the data ethics at Eltronic Group. We emphasize maintaining a high standard of business ethics, which is supported by company values, where we run the company in a responsible and proper manner. This also applies in relation to data use.

Eltronic Group acknowledges the group's responsibility in relation to data collection and data processing, including responsibility for ensuring that technical and organizational measures support ethically responsible data use.

Responsibility in connection with decisions, use and implementation of new digital data technologies as well as the use of personally identifiable data rests with the management of the individual companies, but they must follow Eltronic Group's guidelines and policies for this.

7.2 Background

Personal information and data in general are more important than ever before, and personal information and data are processed and stored to a greater extent as digitization increases. This places a greater demand on processing and protection of data.

7.3 Used and processing data

Eltronic Group operates exclusively in B2B markets and thus processes limited amounts of personal data. To the extent that the companies come into possession of personal data, it is expected that they comply with the group's policy for processing data. Therefore, all customers and suppliers are registered companies, so there is only a very limited amount of personal data from external parties.

Internally, data related to the business is registered, including personal data about employees.

Processing of sensitive personal data takes place exclusively in connection with the obligations we have towards our employees, where processing is necessary in connection with an employment law context.

We take responsibility for the processing of data and ensure that the processing only takes place when necessary and for clearly defined purposes.

Working responsibly with information and data requires a solid foundation within IT and cyber security. Eltronic Group A/S will always seek to implement appropriate IT and cyber security measures, including appropriate management of user rights and access restrictions.

7.3.1 General principles for processing data

Eltronic Group A/S acknowledges that data is an asset and should be treated with sensitivity and respect. Ensuring that appropriate measures are in place to safeguard ethical data processing within the Group is a natural part of doing business in Eltronic Group A/S. We have therefore defined seven data ethical principles:

1. Transparency: Individuals must be able to understand how their personal data is used.
2. Data quality: Decisions must be made based on correct and sufficient data.
3. Data collection and processing must be unbiased, and impartial, and shall correspond to the individual needs.
4. Autonomy: Respect individuals' privacy, protect their rights, and honor confidentiality.
5. Ethics by design: Controls must be built into the architecture to prevent harm and risks to individuals.
6. Responsible data sharing: Data must be shared on a need-to-know basis only, and processes for sharing data must actively and consistently consider and protect individual rights.
7. Accountability: Clear governance, effective policies and processes, and continuous training and monitoring are a must. It is important to Eltronic Group A/S that not only all companies in the group but also the companies that we do business with maintain a high level of data ethics.

7.3.2 Data sharing

Eltronic Group A/S uses a variety of sources for data collection ranging from data collected internally from patients and corporate IT systems and externally from third parties. Regardless of how data is collected, Eltronic Group A/S always respects data privacy laws and regulations.

Document ID: IMS-2550_Data Ethics_EN
Document owner: Tom A. Nielsen
Date: 2026-01-22
Page: 4 of 5

Eltronic Group A/S Kilde Allé 4, DK-8722 Hedensted, Tel. +45 7674 0101, CVR-nr.: 35 48 04 63, info@eltronic-group.com, www.eltronic-group.com

Eltronic Group A/S retains full ownership of data shared with third parties, and Eltronic only shares data for legitimate business processes and in compliance with applicable laws and regulations. When sharing data with third parties, Eltronic Group A/S maintains responsibility for secure and safe data processing and imposes high standards on its third parties to ensure appropriate data security, including protection against unauthorized or unlawful processing, and accidental loss, destruction, or damage.

Eltronic Group A/S never sells data.

7.3.3   Use of AI and machine learning

Eltronic Group A/S do not use AI or machine learning, including algorithms, to process any personal data.