

Communication on Progress 2011

NKT AND THE COMMUNITY

CONTENTS

CEO STATEMENT	2
THE NKT GROUP IN BRIEF	3
REPORTING	4
FOCAL AREAS	5
VIII EISK ADVANCE	Ω

MEMEBERSHIP

Membership date: 27 March 2009 Number of employees: 9,800

Sector: Electricity

REPORTING DATE AND PERIOD

13 October 2011

The report covers the period I July 2010 - 30 June 2011

CONTACT

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Cover photos: With courtesy of NKT companies.



CEO STATEMENT

In NKT we believe that a global mindset is a prerequisite for success. Therefore we think and act globally in order to positively influence all stakeholders in our value chains to strive for sustainable businesses. Only by worldwide interaction and commitment can we succeed in developing a sustainable future

Accountability has been a part of NKT's values throughout our almost 120-year history. We work with respect for our employees, shareholders, suppliers, customers and other stakeholders. We care for the environment, not only by constantly seeking to reduce environmental impacts from our own production facilities, but also by taking the customers' use of our products into serious account. This is another aspect of having a global mindset.

NKT takes responsibility

The pressure on the world's scarce resources will most probably increase further. As a result, the urgency to develop a sustainable future is evident. We are present all over the world, so the challenge of achieving sustainable solutions for the benefit of everyone is also ours. In NKT, we have already taken action to carry our share of the global efforts to achieve a sustainable world by setting striving goals internally, and also by influencing our entire value chain to be ambitious in this matter. This is why NKT strongly supports the UN Global Compact; adhering to these principles constitutes an important part of our Corporate Social Responsibility (CSR) initiatives. And meanwhile we strongly urge our suppliers to do the same. In fact, this is one of our main goals within the Human and Employee Rights area.

NKT sets ambitious goals

The 10 UN Global Compact principles are well on the way to being integrated into NKT's CSR efforts. Two years ago we applied for membership and we have already reached the first goals in each of the four focus areas. We now have an extensive database on reported parameters and the overview will help us to define more specific and focused goals in the future, whilst further establishing our expectations towards both our internal and external value chain.

This is our third Communication on Progress Report. Our aim is continuously to provide a fair picture of our achievements, providing factual information and being straightforward about our successes as well as our challenges. In this reporting period we have seen decreasing Group CO2 emissions and although encouraging, it will be a challenge to meet the goal of 12% emission reduction relative to output by the end of 2011.

After the closing of this reporting period, NKT received a Statement of Objection from the European Commission in connection with an investigation of the cable market, and NKT is providing its observations. The investigation could take one or

two years before being settled. However, this challenge does not change our strong emphasis on fair and equal business conditions for all companies. Although we are well on the way to deploying the UN Global Compact into our CSR profile, businesses and value chain, we cannot guarantee there will be no setbacks. What we can promise is that the NKT Board of Management will tackle the work with complete dedication and remain fully focused on our Corporate Social Responsibility. We see the work with CSR as a long, continuous journey and we hope that the efforts may be a source of inspiration just as the efforts of others have inspired us.

Brøndby, Denmark 13 October 2011 Thomas Hofman-Bang President and CEO NKT Holding A/S

THE NKT GROUP IN BRIEF

The NKT Group comprises four business areas:

NKT Cables

NKT Cables develops, manufactures and markets a wide selection of cables. From low voltage cables for domestic lighting, to catenary wires that supply power for high-speed trains travelling between China's major cities, to submarine cables that connect together offshore wind turbines, to cables for cars. The products are sold worldwide.

Nilfisk-Advance

Nilfisk-Advance supplies indoor and outdoor cleaning equipment to a global, professional clientele as well as vacuum cleaners for private use. Individual service agreements and spare parts sales are also provided, giving customers availability at all times. The products are sold worldwide.

Photonics Group

Photonics Group consists of three companies all active in the field of advanced fiber technology. Products are based on the unique light-conducting properties of optical fibers. The products comprises crystal fibers, fiber lasers and systems used in material processing, sensing and life science industry, temperature measuring equipment for applications such as tunnel fire detection as well as equipment for splicing, joining and forming optical fibers. The products are sold worldwide.

NKT Flexibles

NKT Flexibles supplies flexible pipe systems for offshore oil and gas production. The company is one of only three in the world manufacturing pipes that can withstand internal pressures as high as 600 bar and temperatures of up to 130°C. The pipes are used to link the well with the production rig, and the flexibility of the pipes enables them to absorb both wave action and platform movements. The products are sold worldwide. NKT Flexibles is a joint venture in which NKT Holding holds 51% ownership.

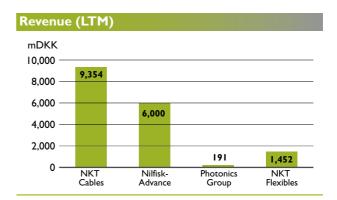
NKT Commitments

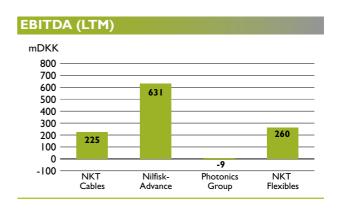
NKT has adopted a number of voluntary projects and principles with emphasis on Corporate Responsibility:

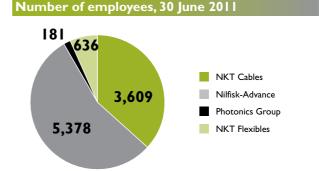
Organization or project	Year of adoption
Carbon Disclosure Project	2009
UN Global Compact	2009

The NKT Group also participates in relevant trade, industry and standardization associations around the world.

According to internal policies, NKT does not engage in political activities nor contribute to or support political parties, candidates or committees.









REPORTING

The NKT sustainability model is based on the innovation and commitment of our entire value chain. Our report builds on international protocols, which allows comparability among our business areas and with other companies

NKT signed the UN Global Compact on 27 March 2009 and this is our third Communication on Progress (COP) Report, covering the period I July 2010 to 30 June 2011.

Reporting structure

Given that the Group's four business areas are diverse, so are the challenges related to CSR. Therefore, we report separately on each of the four business areas. Our COP reports address the UN Global Compact's 10 principles divided into three parts: Human & Employee Rights, Environment and Anti-corruption.

Group guidelines and policies

The first efforts on a corporate level were to relate the 10 principles of the UN Global Compact to our company standards, leading to a definition of ethical guidelines for the Group. These guidelines have been supplemented by Group policies and have been communicated throughout the Group. Some of the business areas have taken the guidelines a step further and enhanced them with Codes of Conduct.

Reporting system

To improve benchmarks and ensure continuous progress we have established a comprehensive reporting system within the Group. The reporting system provides data and information from the individual units within the Group and now delivers most of the necessary data and information on which our CSR works and future reporting will be based. The four business areas are responsible for data collection and the quality of the Key Performance Indicators (KPIs).

The reporting system is composed of four elements:

- A whistleblower system where all Group employees can report serious concerns about a number of behaviours, events or circumstances that seem incorrect. Reporting can be made anonymously.
- A data collection system where we can continuously register various KPIs, such as work accidents, type and amount of fuel and energy consumption, CO₂ emission from travel and transport, raw material consumption, undesirable events such as environmental spills and fines.
- A Statement of Representation on Corporate Social Responsibility signed off by local management in the Group companies once a year to ensure that they are familiar with and work to advance the UN Global Compact principles.

• A special reporting scheme where the four business units annually report on matters such as diversity in management, efforts within R&D to support the UN Global Compact, etc.

Both the reporting system and the Statement of Representation include almost 100 units worldwide.

GRI

NKT has been inspired by the parameters of the Global Reporting Initiative (GRI). We have carried out an assessment of materiality of the GRI indicators based on the methodology proposed by the GRI. The methodology remains unchanged from 2010, and we have chosen to report on a total of 16 indicators.

In cooperation with the business areas, the Group has formulated a comprehensive set of parameters, reporting procedures and related instructions which form the basis for this reporting system.

Data reliability

Although the implementation of the consolidated reporting system is complete, some elements are not yet fully operating in all areas. Procedures and instructions related to data quality, data traceability and control measures are still under development. Therefore, the uncertainties of the primary input data, which still exist as a result of this ongoing work, have to be taken into account when considering the conclusions of this report. However, the employment of data has become more consistent as the employees gain more experience in reporting.

Auditing

The NKT Communication on Progress 2011 Report on the Group's CSR efforts is not audited by an independent auditor.

It is the intention to conduct test audits in selected companies within the NKT Group in the coming reporting period. The test audits will focus on data collection procedures, data quality and business procedures in general.

FOCAL AREAS

NKT primarily centres on the environmental and anti-corruption areas of the UN Global Compact. However, targeted efforts within Human & Employee Rights have also been made. The first goals have been achieved, promising results are in the pipeline, and new challenges are appearing

When adhering to the UN Global Compact in 2009 we assessed which action areas would have the most impact on a relative short-term basis to assure buy-in throughout the organization. Our assessment was and is continuously based on:

- The UN Global Compact 10 principles
- Our business situation
- Our business culture

Based on a thorough business analysis we identified the largest potential for positive impact in the areas of Environment and Anti-corruption. We deemed it relevant, however, to initiate actions and targets within all of the main areas and report on these. Furthermore, NKT intends to widen the initiatives and report within other societal areas in the future.

To ensure that the principles are propagated and complied with throughout the Group, all NKT unit general managers must annually report on the situation in their units via our Statement of Representation. In this statement they report on facts and declare their adherence to the UN Global Compact principles as managers and on behalf of their units.

HUMAN AND EMPLOYEE RIGHTS

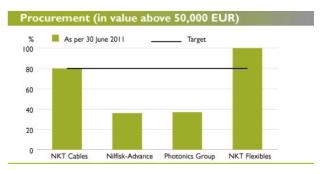
Being a global company it is also our obligation to assure these rights in areas of the world where they are not necessarily prioritized. This is especially important when NKT acquires companies in such areas. For NKT, consideration of these issues is now an integral part of M&A procedures. In addition, NKT also has a set of policies related to Human and Employee Rights. They are available on our corporate website: www.nkt.dk/uk/Menu/About+NKT/Policies.

Codes of ethics

All business areas have goals for manager information and acceptance of the UN Global Compact. Some business areas have elaborated on the NKT Ethics Statement with the aim to make their own version known, understood and accepted by all white collar employees. More initiatives will follow in the next reporting period.

Value chain adherence to UN Global Compact

One of our goals is to integrate Human and Employee Rights in our value chains. We therefore require that our suppliers also comply with the UN Global Compact. Our objective is that by the end of 2011 at least 80% of the Group's suppliers (annual purchase value above 50,000 EUR) shall be contractually committed to the 10 principles, see the figure below.



While suppliers in EMEA/APAC countries show great willingness to adhere to the UN Global Compact, suppliers in other geographic areas remain reluctant. However, NKT continues to push this issue when negotiating new contracts.

THE 10 PRINCIPLES OF THE UN GLOBAL COMPACT

Human rights - businesses should

- 1. Support and respect the protection of internationally proclaimed human rights
- 2. Ensure they are not complicit in human rights abuses

Labour - businesses should

- 3. Uphold the freedom of association and the effective recognition of the right to collective bargaining
- 4. Uphold the elimination of all forms of forced and compulsory labour
- 5. Uphold the effective abolition of child labour
- 6. Uphold the elimination of discrimination in employment and occupation

Environment – businesses should

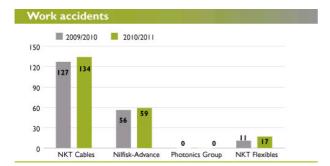
- 7. Support a precautionary approach to environmental challenges
- 8. Undertake initiatives to promote greater environmental responsibility
- 9. Encourage the development and diffusion of environmentally friendly technologies

Anti-corruption - businesses should

10. Work against corruption in all its forms, including extortion and bribery

Work accidents

The health and safety of our employees is a key NKT management concern. Absence caused by occupational injuries is reported in all our business units, and high targets for improvement are set. Although well on the way, status shows that in some business areas even more attention is needed in this area in order to be among the best. More business areas have set a zero occupational injury goal.



It's all about people

Attracting and retaining the right employees with unique competencies is alpha and omega for a specialized group such as NKT. Many business areas have special talent development programmes while others e.g. offer English courses to ensure that the employees can work across borders in a continuously growing global company.

ENVIRONMENT

We track energy consumption for all our business units. Improvement targets, indexed to levels of activity, are established for business segments as well as for the Group as a whole. NKT reports its annual CO₂ emission to the Carbon Disclosure Project organisation.

Ambitious CO, target challenged

In 2009 we declared our objective to reduce overall CO₂ emission by 12%, relative to output for the period 2009-2011. Although 2010 showed a decrease of approximately 2% compared to the previous year, it is proving to be somewhat challenging to reach the target which is based on 2008 expectations. The target was set before the financial crisis and was therefore based on significantly higher growth rates than actually realized, and on a product mix that is slightly different from actual market demands. It remains to be seen if the goal will be realized by year-end 2011.

Data reliability

Our data collection system implemented in 2010 revealed a significant deviation between previous and present reported CO_2 data. Reporting period data are currently found to be reliable and consistent when it comes to Scope 1 and 2 emissions. Scope 3 data are still less accurate and imcomplete. This is primarily due to varrying calculation methods used by transportation companies, and that many NKT business units have just started collecting data and to report on this parameter.

Product environmental footprint

The products of NKT Cables and NKT Flexibles are to a large extent environmentally friendly in usage. Therefore, our greatest contribution is to continuously reducing the level of production

scrap, and in contributing to develop entirely new products or product applications that can reduce the environmental load in the overall supply chain.

In Nilfisk-Advance we believe that the greatest environmental challenges and improvement measures lie within the areas of reduction of environmental load from products in use. This is a focual point in the product development.

ANTI-CORRUPTION

We buy large volumes, operate with large projects and we are active in sectors where there have been incidences of cartels and corruption. Furthermore, we are a global company with presence in parts of the world where corruption has been and still is more widespread.

Internal compliance concept

NKT is a strong advocate for fair competition. We consider it to be an important asset to our customers that we are not party to unlawful, anti-competitive practices. We want to ensure that our policies on this issue are in focus and complied with. Therefore, an anti-corruption review is part of the aforementioned Statement of Representation signed by all NKT unit managers once a year. The document is affirming, among other things, that management action has been taken to ensure that employees with extensive interface with suppliers or customers are aware of NKT's anti-corruption policy and the consequences of non-compliance. In addition, we register and will report all filed incidences of corruption, cartels and money laundering. During this reporting period we have not registered cases of corruptive behaviour or money laundering.

Statement of Objection

After the closing of this reporting period NKT Cables and NKT Holding received a Statement of Objection from the European Commission in connection with an investigation of the submarine and underground high voltage cable markets in the period 1999-2008. NKT is now providing its observations to the European Commission. The investigation could take one or two years before being settled.

Facilitation payments

Until now we have reluctantly accepted that facilitation payment may to some extent be necessary to ensure that agreed services can be offered or supplied, or that the reasonable safety or rights of employees can be provided. A system to record and track facilitation payments has been established and has been very helpful in creating awareness of the proportion of this matter. A few cases have been recorded in this reporting period.

The increased awareness has led many of our businesses to work with setting up internal awareness campaigns and/or introducing codes of conduct to support the approach of a revised standpoint of non-acceptance of facilitation payments.

Moving forward we intend to focus also on people out of our own ranks, including agents. We will start by taking measures to ensure that our business partners are contractually obliged to act in accordance with our policies.

Whistleblower system

A whistleblower system is in place to improve our ability of discovering irrigularities. It allows employees to report serious concerns about a number of irrigularities or inappropriate behaviour. Reports can be made anonymously in any chosen language, and in writing or orally. Two of the registered reports for 2010-2011 have lead to material adjustments in business procedures. None of these were of a corruptive nature.



NILFISK-ADVANCE

Nilfisk-Advance is introducing "Green meets clean", sustainable cleaning, as the headline of our work with Corporate Responsibility in the coming years

We are proud to be one of the world's leading producers of professional cleaning equipment. Our products are manufactured on three continents and used worldwide. We offer our customers cleaning solutions that are both efficient and improve the sustainability of the industry.

We constantly work to improve our products. New products shall provide equal or enhanced cleaning efficiency while using less energy, less water or less detergent. We, as well as our customers, see great potential in developing cleaning solutions with a better environmental performance.

We want to take a leading position in this development, and we call it "Green meets clean".

Being a participant of the UN Global Compact we are also dedicated in ensuring that Nilfisk-Advance is a good company to work for, for all our people regardless of location. We focus on the environment when conducting our business and we wish to ensure that our principles on business integrity are well-known and live within our organisation.

We are certain that our commitment to the UN Global Compact and Corporate Responsibility will help us to develop our business in a new and positive direction. It will also enable us to meet the growing demand from customers for sustainable and more efficient products and processes.

Brøndby, Denmark, 13 October 2011 Jørgen Jensen CEO, Nilfisk-Advance A/S





JØRGEN JENSEN

Nilfisk-Advance A/S

- We offer our customers cleaning solutions that are both efficient and improve the sustainability of the industry.



HUMAN AND EMPLOYEE RIGHTS

As a global company we operate in parts of the world that have a long tradition of respect for individual rights, and also in parts of the world where these rights are not necessarily prioritised. We consider it important that all our employees are assured good and fair conditions and we are committed to setting an example in the countries where we operate.

To reach our business goals it is crucial to have a dedicated workforce, an inspiring working environment and to be able to continuously foster new talents.

A wide range of initiatives help establish the commitment of Nilfisk-Advance with our people. We have both global and local initiatives to ensure that we act as a corporate citizen and are an employer of choice for our employees.

Our products are attracting professional, responsible customers. They too want to ensure that the products they use have been produced responsibly. We know that wherever we operate, the responsibility for compliance lies with ourselves, and not only with the local authorities. We are therefore committed to ensure that not only we, but also our suppliers conform to our standards and observe the UN Global Compact principles.

As an important part of our efforts within this field we have drafted the Nilfisk-Advance Code of Ethics and communicated this throughout the entire organization.

We have also established a whistleblower system where any violations or breaches can be anonymously reported by anyone in Nilfisk-Advance

GOALS: HUMAN AND EMPLOYEE RIGHTS

Management

Goal: 30.06.10

All local management teams are informed of our policies, have issued their comments and have endorsed the policy

Goal: 30.06.10 and onwards

All local management teams are informed of our policies, have issued their comments, and have endorsed the policy

Goal: 30.03.11

Zero tolerance for acts of discrimination of any kind and consequently no cases to be reported

Actions

Actions

Local management teams are to sign a Statement of Representation on the UNGC principles at least once a year.

Human and employee rights are part of the standard agenda at local business board meetings at least once a year

Actions

To establish a registration system for reporting cases of discrimination

Status



Status as of 30.06.11



The activity is ongoing

Status as of 30.06.11

A registration system for reporting cases of discrimination has been established. One incident was reported in the COP 2011



The activity is ongoing



100 YEARS UNION ANNIVERSARY

An important part of how we comply with human rights is to ensure freedom of association in our company. An illustrative example is from Denmark where we had the pleasure of celebrating an impressive 100-year anniversary for workers' union group "Klub 32 Metal" of the Danish Metalworkers' union in Nilfisk-Advance.



Goal: 30.06.11

We will foster skilled employees so that they have the opportunity to achieve their full potential

Actions

The People Review Programme will be extended from Top60 to include Top200 leaders in our company

Status as of 30.06.11

Activities to develop a strong culture and excellent leadership skills have been initiated to support this goal.



The acitivity is ongoing

Goal: 30.06.11

80% of the procurement (value above 50,000 EUR) is to be supplied by partners who have agreed to abide by the principles of the UNGC

Actions

The principles of the UNGC are part of the text in new supplier contracts. When contractual agreements are in place, we plan to carry out control visits based on a risk assessment at some suppliers

Status as of 30.06.11

EMEA*/APAC** countries have continued their positive development on this target: 76% of direct spend (in value) is now with suppliers who have agreed to comply with the principles of the UNGC.

The result on global scale is somewhat lower at 36%. It is an improvement, but we also realize that we still have a long way to go to reach our

We will continue our efforts in this area.



The activity is ongoing

Work accidents

Goal: 30.06.11

Regular reporting on the number of occupational injuries followed by definition of target for reduction of injuries (leading to absence)

Actions

We measure and define progress goals, take preventive initiatives and follow up on all incidents

Status as of 30.06.11

A registration system has been established and regular reporting on occupational injuries is

Investigation is ongoing as to the nature of occupational injuries to ensure best practice in local follow-up and preventive measures.



The activity is ongoing

Labour Rights

New goal: 30.06.12 and onwards

Code of Ethics is an integrated part of the M&A due diligence process, and non-conformity findings are reported

Actions

Based on non-conformity findings we ensure that employees from newly acquired companies are treated equal and fair



Partly accomplished



Not accomplished



- * EMEA: Europe, Middle East and Africa
- * APAC: Asia-Pacific



ENVIRONMENT

We see environmental sustainability as an element of sound business practice. If we as a company can reduce our consumption of resources it will benefit the environment, not to mention the economic benefits for ourselves and our customers

"Green meets clean" is how Nilfisk-Advance works with environmental consciousness in developing new products for our customers...

Our cleaning machines naturally consume energy, water and in certain product areas also detergents. Designing equipment which can clean to the same high standard but using fewer resources is, therefore, our greatest challenge. Thus this is the area where we can make the maximum possible impact in our environmental efforts.

Our own internal consumption of resources is also an area of environmental focus. In our manufacturing entities we continuously strive to minimize environmental impact. And in our sales entities, offices and in our daily behaviour, we encourage environmentally sound choices through initiatives and environmentally justefiable policies.

GOALS: ENVIRONMENT

Product development

Goal: 30.06.10 and onwards

All new products contain sustainability improvements within at least one and preferably more of the following four areas: energy consumption, water consumption, use of detergents and disposal

Actions

The sustainability of products is an important part of the decision in the product development process

Status as of 30.06.11

Our platform for technology development, 'Customer Focused Technology Development' has taken the environmental impact of future products as a high priority parameter in activities.

Worldwide, 60% of new products launched by Nilfisk-Advance last year contained an environmental improvement within at least one of the four environmental focus areas.



The acitivity is ongoing



50% SAVINGS ON ELECTRICITY

We collect suggestions from our employees on potential solutions for energy saving. One result from the extensive initiatives on electricity, is segregating the lighting system into small areas in one of our production units in China so that only the active parts of production halls are lit. And replacing the electrical heating system with a solar heating system which has reduced electricity from 110KW to 8KW. By taking these measures, the production unit successfully reduced their use of electricity by 50%.



CO₂ emission

Goal: 31.12.11

12% reduction in 2011 on reported emission relative to output (revenue) as compared to 2008

Actions

Monitor and report on the emission at all locations. Based on this we ensure local focus on energy reduction in our processes

Status as of 30.06.11

It is not possible to conclude on reported emission data from 2008 due to problems with data quality.

The data collection process has significantly improved towards COP 2011.

Adjusted target is 10% reduction in COP 2014 relative to output as compared to COP 2011.

The goal is redefined

Products' environmental footprint

Goal: 31.12.11

Product footprints from highest selling products are to be identified

Actions

We will identify and reduce the full environmental impact from our highest selling products within energy and water consumption, use of detergents and disposal

Status as of 30.06.11

We have established a methodology to identify the environmental footprint of our top products, and the first pilot project has been conducted.

Goal: 31.12.15

Set target for reduction of highest selling products' environmental footprint

Action

Finalize environmental footprint pilot projects and evaluate results. Use outcome to set target for reduction of highest selling products' environmental footprint

The goal is ongoing

Status as of 30.06.11

Worldwide, 60% of new products launched by Nilfisk-Advance last year contained an environmental improvement within at least one of the four environmental focus areas in product development: water, detergents, energy and disposal.

New goal 31.06.12

Actively participate in industry-related activities, boards and committees to push for agreement on industry standard for measuring environmental performance of products

Action

Ensure Nilfisk-Advance representation in relevant bodies of influence

The goal is ongoing



Partly accomplished



Not accomplished





ANTI-CORRUPTION

We consider corruption a major challenge for the global community. We are committed to working against the negative effect that corruption has on fair competition and towards the development of a stable society.

Corruption undermines healthy competition, and money ends up in the wrong hands. As corruption is particularly widespread in poor communities, this makes the effect even worse.

In order to support the work on business integrity we have drafted and communicated the Nilfisk-Advance Code of Ethics in which our position on business ethics is stated.

Furthermore, a global whistleblower system has been established in Nilfisk-Advance enabling employees to anonymously report anti-corruption as well as other unlawful incidents.

We have also established procedures in Nilfisk-Advance to ensure all our people, both at management and employee levels, are duly informed and conscious of company policies on business integrity.

GOALS: ANTI-CORRUPTION

Management

Goal: 30.06.10 and onwards

Local unit general managers are informed of our policies, have issued their comments and have endorsed our policies

Actions

Local management teams are to sign a Statement of Representation on the UNGC principles at least once a year.

Human and employee rights are part of the standard agenda at local business board meetings at least once a year

Status as of 30.06.11

The activity is ongoing



Corruption

Goal: 30.06.10

Actions

Report the number of filed corruption and cartel cases, if any. None were reported

Actions

Ensure employees are knowledgeable on how to act according to Nilfisk-Advance expectations on business integrity issues

Implement Code of Conduct with behavioural guidelines for all employees

New goal: 30.06.12

New goal: 30.02.12

Apply risk management in growth markets on Business Integrity issues

Actions

Identify high risk areas of possible violation of Nilfisk-Advance Code of Ethics. Implement Code of Conduct and initiate targeted training programme



COMMUNICATION OF CODE OF ETHICS

We have Nilfisk-Advance Code of Ethics and it is included in all employee handbooks, is presented to all new employees and posters are present in our offices and manufacturing facilities. We require and expect that anyone who acts on behalf of Nilfisk-Advance complies with these guidelines. The Code of Ethics is also raised at Business Board Meetings with all our companies, and we encourage all our suppliers to undertake their business in accordance with the principles of the UNGC.



Facilitation payments

Goal: 31.12.10

Submit a report on the first full year, perform assessment and define subsequent goals

Actions

To define what the concept of 'facilitation payment' means in our company

Status as of 30.06.11

We have adopted the OECD definition of facilitation payments.

A registration system has been established that requires local management to report cases of facilitation payments. As per 31.12.10 there have been no reported cases.

As of 01.01.11 this goal makes up a part of the other anti-corruption goals



Partly accomplished



Not accomplished \bigcirc



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NKT