PLUTO GROUP 2021

RESPONSIBILITY REPORT



It is no secret that 2020 was a difficult year. A year, both scary and painful, for the restaurant industry. We have had to change our business overnight due to restrictions, we have experienced several lockdowns and we have had to say goodbye to colleagues.

This past 1,5 year, we at PLUTO group, have been forced to pause, rethink, and set our priorities straight. And what are we without our people? Not a lot, except for empty restaurants. Therefore, our focus in 2021 has been to regain our people. Both our guests and our employees. It has been one of our top priorities to make sure that our colleagues were taken care of, as well as welcoming our guests in a safe environment.

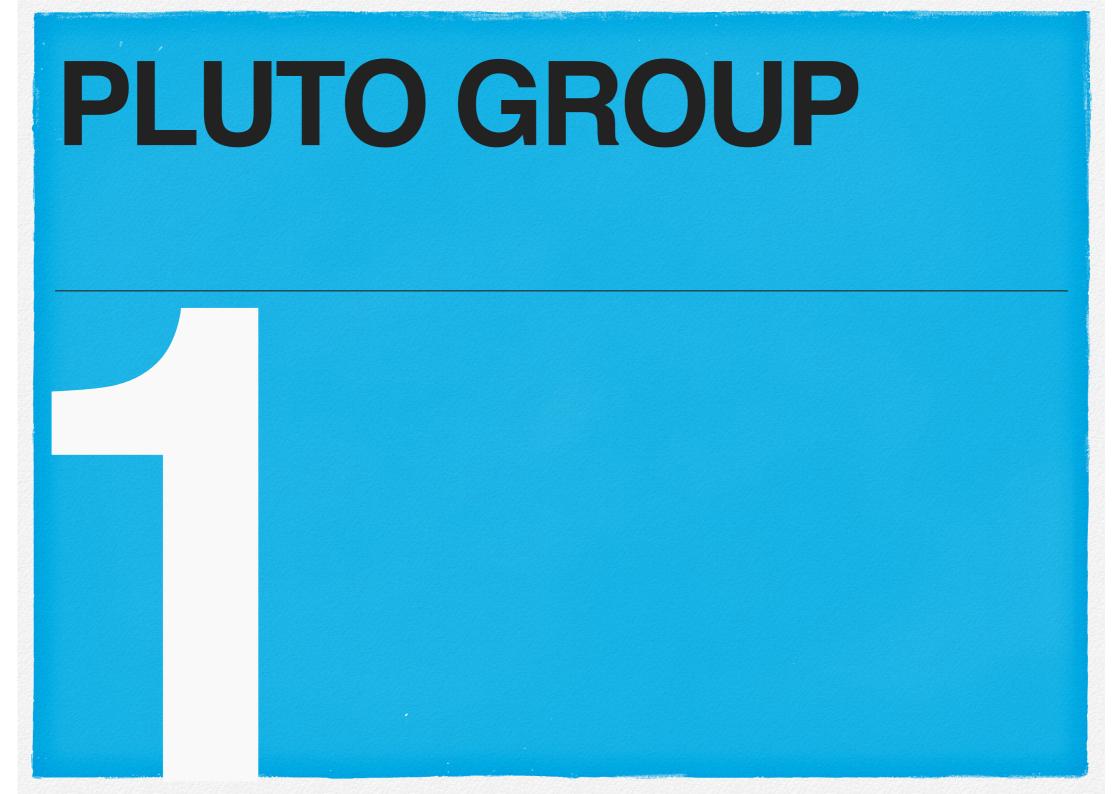
While the pandemic has affected our daily operations, we have continued to focus on our work in becoming more sustainable. It is one of our highest priorities to act responsible as a business. However, we are convinced that a healthy business has a greater profit to improve, and therefore the process needs to be realistic and progress in a pace that both the company and the economy can sustain. We will continue this journey, working with the UNGC's Ten principles and our due diligence with REGA, in the years to come.

I hereby confirm that Pluto group continues the support of the Ten Principles of the United Nations Global Compact.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture, and daily operations.

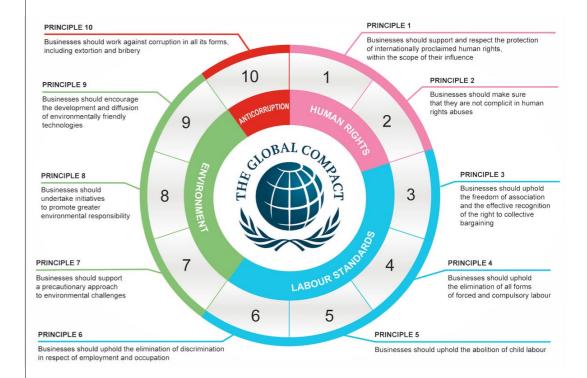
Sincerly yours,

Jesper Madrirazza-Marcussen Chief Executive Officer



THIS REPORT

At Pluto Group we emphasize the importance of our work with sustainability and that it is rooted in our business on all levels. It is one of our core values that we have transparency and accountability in the way we do business. It is therefore fundamental for us to report how we work with and implement the Ten Principles into our strategies and operations, as well as our efforts to support societal priorities. This report (CoP) is a key component of our commitment to the UN Global Compacts, and illustrates our relevant policies, procedures, and activities committed to sustainability. We will in this report illustrate how we have made a progress on our CSR activities during the financial year 2021 and what we plan to focus on in 2022.



ABOUT

Pluto group was founded in 2011. The driving force behind the company, which in the daily goes by the name "Pluto group", has since the beginning been to open restaurants where quality, taste and atmosphere is paramount. Behind the restaurants are the partners Rasmus Oubæk & Jesper Madirazza-Marcussen who since their first restaurants, has managed to create original concepts, tasty food, wine and good atmosphere.

A lot has happened since the first bistro opened in 2011, and today the family consists of 250 dedicated employees, 8 co-owners and 7 different restaurants; Two Retour in Copenhagen, Pluto at Borgergade, the sister restaurant Gorilla in the Meatpacking district, the sinful Italian Barabba, the French bistro Restaurant Maison in Dronningegaarden and the latest addition to the family; Bottega Estadio in Østerbro. All with their own identity and particularity, but with the common goal of creating memorable evenings for the guests.

REGA

The Pluto group's collaboration with REGA started in the early years of the pioneer project. CEO Jesper Madirazza-Marcussen was one of the front runners who, along with other restaurant owners, saw great responsibility in the industry and a lack of initiatives and best practices with corporate social responsibility. It evolved into the organization, that today goes by the name of REGA (Restaurateurs' Guarantee Association) who is the world's first industry-wide initiative that works specifically with Corporate Social Responsibility. With REGA a best practice model is created which sets out both how the restaurant industry can best run responsible and sustainable businesses, and how companies across the industry can work together in a joint initiative that has corporate social responsibility in focus.

As a member of REGA, we have along with the other members, committed to sign up to the UN Global Compact and to live up to the UN and OECD's minimum standards for responsible business conduct (UN Guidelines for Human Rights and Business and OECD Guidelines for Multinational Enterprises). This means that as a member of REGA, we work together and focus on improving the company's social, environmental, and economic bottom line. In this way, respect for human rights, the environment, and a focus on anti-corruption are guaranteed. Pluto group has been an active member of REGA and UN Global Compact, since October 2018.

PEOPLE



DISCRIMINATION & HARRASMENT



In terms of discrimination, we acknowledge that Pluto Group may have adverse impacts on the right to non-discrimination both in terms of our guests and employees. At Pluto Group, we address potential adverse impacts on this right, we appreciate individuality and we strive to recruit a diversified group of employees throughout our company and at each restaurant.

Regarding discrimination in terms of gender composition, Pluto Group recognizes the importance of attracting, developing, and retaining the right talent of all genders. We solely choose our staff based on their professional qualifications and unique personalities. We embed our work with anti- discrimination through information in our employee handbook and on guidelines how to handle any forms of discrimination.

As a restaurant, we cannot always ensure the behavior of all our employees. That is why we at Pluto Group are very clear about what is tolerated and not tolerated at our company. We have a clear set of rules and guidelines on abusive behavior, hereunder sexual harassment, formulated in our employee handbook. At Pluto Group, abusive behavior from our staff will have employment consequences. Furthermore, it is a permanent topic on the agenda at our monthly management meetings, at each of the restaurants.

Together with REGA and the other REGA members, we aim for a future free from harassment in the restaurant industry, and we are committed to continuously look for risks to prevent and mitigate them. This is a topic we will continue to work on in 2022 and onwards.

HEALTH & SAFETY

It is one of our highest priorities that our employees are taken care of and are working in a safe environment. This has especially been important during the pandemic and after. We have introduced several initiatives the past year, to improve safety for our employees.

To give our employees the best conditions for a safe and healthy working place, we are, in collaboration with REGA, doing a yearly employee impact survey, which works as an "employee feedback system". This ensures, the right of our employees, to the possibility of giving feedback and expressing their concerns and/or experiences relating to the right to safe and healthy working conditions. This gives us an insight in how we can act to improve the care for our employees.

Pluto Group's primary actions to address stress in work situations are; communicating clear roles and responsibilities, ensuring predictability in own work situations and tasks and ensuring adequate amount of staff.

SAFETY

We have defibrillators at all restaurants and we will therefore focus on CPR/AED training in 2022, to educate our employees in how and when to use an automated defibrillator.

At Pluto group, we are through subscription regularly refilling our first aid kits and checking fire distinguishing equipment. We have made sure that visible signs with safety instructions, incl. evacuation plan, are in place in each of the restaurant.

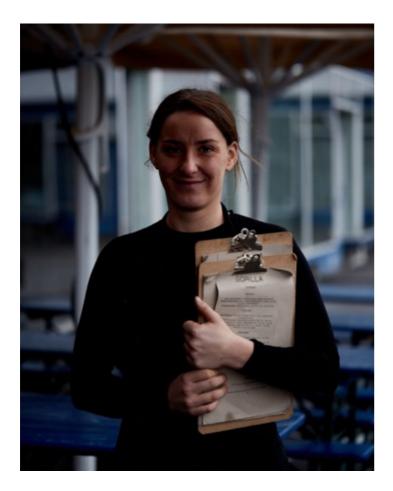
We provide several safety manuals, incl. guidelines for staff to immediately contact local police in case of violent incidents and training in conflict management through employee handbook.

We have at our restaurants introduced Action Cards. Action Cards provide an easy and manageable access to procedures on how the company would expect their staff to react in a critical situation. The cards are a part of our general security procedures, as well as our cardiac restorers and safety representatives. Pluto Group has been a major part in the development of our Action Cards. In addition, we have also translated the Action Cards to English since several of our employees do not have Danish as their first language.

The Action Cards offer, among other, solutions to the most serious incidents that we as a restaurant may face. In this way, we make sure that our employees are well-prepared for every possible incident.

PEOPLE

EQUAL PAY FOR EQUAL WORK



Pluto may have adverse impacts on the right to equal pay for equal work; especially regarding the possible difference in pay between men and women, but also in a broader sense regarding all the grounds for discrimination mentioned under the right to non- discrimination when determining starting salaries, when evaluating work effort, i.e. determining bonuses etc., or in promotions.

Pluto Group ensures that there is a fixed starting salary for all job functions in the restaurant that may only be increased based on competencies and similarity between front end and back end staff ensuring equal pay for chef and waiters, equal pay for middle managers both front end and back end that may only be increased based on competencies. Wage increases are based on recommendation from restaurant manager to company management, and a decision for wage increase is always decided by at least both parties. When assessing each employee's competencies when determining a wage increase, we make this assessment based on dialogue.

EDUCATION

We acknowledge that training and employee development are integral to ensure a high employee motivation and retention, and we therefore offer a large variety of regular internal training e.g. within service excellence, advanced wine, coffee and cocktail courses. We also provide the opportunity for company paid sommelier courses, voluntary coffee courses, courses within service excellence etc. To this end, we provide a solid job introduction and training to new colleagues, a 'buddy program' and on-the-job coaching. This is high priority of ours, and we will continue to offer training and development for our employees in 2022 and onwards.



PLANET

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ORGANIC PRODUCE

One of our highest priorities at Pluto group, is to serve food and drinks of high quality. We believe that organic produce is better for the people and the planet. That's why one of our key focus points is to serve as much organic produce at our restaurants, as possible. As of now, the food we serve is 35% organic, which is an increase on 20% since 2019.

As a part of our 2022/2023 strategy we want to increase that number.

We sell 35.000 bottles of wine annually, where at least 80% of them are organic nature wine, some of them biodanymic. We believe in organically farmed wine (biodynamically, using permaculture or the like), made (or rather transformed) without adding or removing anything in the cellar.

We buy all our beer from a local Danish supplier called Møns Bryghus, and we buy approx. 50.000 liters a year. As a part of our 2020 strategy, we replaced all our beers to organic beers from Møns Bryghus. We now only serve 100% organic beers at alle of our restaurants.

As a part of our 2022 strategy, we are working on introducing organic spirits and other beverages.



WATER



Due to Pluto group's daily use of water, we assess that in our daily operations we are at risk of significant adverse impacts in this area. We are also aware that adverse impacts concerning water consumption is a concern for the beverage industry, hence we assess that we are linked to significant adverse impacts.

As a part of our work with environmental sustainability, we have assessed recent years' water consumption in our daily operations in representative restaurants, establish guidelines for all employee groups to reduce water consumption in our daily operations, established a code of conduct/ contract clause for business relationships and replaced old dishwashing machines in order to work towards using less water when dishwashing, by using better technology, dishwashing machines and filter plants

As a part of our 2022 strategy we will require of our suppliers to conduct and submit regular impact assessments on social, environmental and economic sustainability and we will continue our close dialogue with our beverage supplier as we will ask of them to assess their potential adverse impacts on this specific issue, knowing that the amount of water consumption in the production of beer is a concern.

PLANET

SUSTAINABLE FISHING



As a co-owner, investor, and customer of Blue Lobster, we support responsible and sustainable fishing.

Blue Lobster is a digital platform that enables small-scale fishermen to sell directly to end-consumers, while also making it economically viable for them to fish sustainably.

Blue Lobster is the first digital place to buy and sell low impact and fair seafood. Their app connects chefs with low impact fishermen and delivers the best quality seafood straight from the harbor and pay the fishermen fairly.

The fishing industry in Denmark is slowly dying. There are few vessels sitting on large parts of the fishing quotas, and it has become much more difficult to fish on a small scale. Since 2010, 42 per cent. of the fishermen have left the industry in Denmark, and 49 fishing ports have been closed.

The fish is sent on a long expedition after it has been caught, and the freshness has evaporated long before it reaches consumers. The fish can be travelling up to 4-16 days before they land on the plate. The fish are transported to large auction houses in Jutland, and then they are transported back across Denmark again.

By using the Blue Lobster app, fishermen avoid sending their catch out on a long journey and gone are the expensive middlemen. The fishermen get a greater return on their catch and consumers get it cheaper than if they had to go to an auction or to the local fish shop. This is an important cause, that we at Pluto Group are very proud to support.

A GREENER MENU & ANIMAL WELFARE

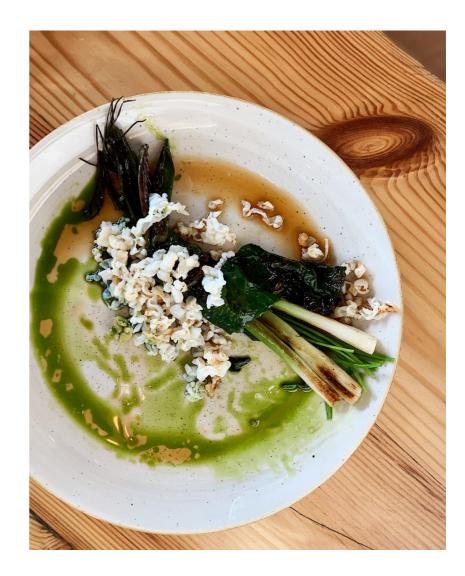
Pluto assess that we may contribute to significant risks in the area of animal welfare, as we serve drinks and food potentially affecting animal welfare. This is a general concern for the restaurant industry.

The risks involve our procurement decisions and thus our supplier relations. We therefore assess that we may both contribute to and be linked to adverse impacts in this area.

Every year we increase the number of green courses on our menus. We offer vegetarian or vegan options at all our restaurants, both on our a la carte menu, but also on our set menus. All our vegetarian and vegan dishes are placed central and alongside our other dishes, as an attempt to encourage more guests to order green options.

Further, we have revaluated all of our animal products, in our strive to become more sustainable. It is no secret that animal products are one of the big sinners in Co₂ emission and climatic changes. Today, we have a local supplier for most of our animal products and we are very conscious of the quality of our animal products, and is constantly looking for more sustainabde options and higher quality.

Our work with a more sustainable menu will continuously be a key component of our sustainability agenda in 2022 and onwards.



100% GREEN ENERGY



We use energy for our daily operations, thus we assess that we may cause or contribute to adverse impacts in relation to the use of energy at Pluto.

As we are dependent on external supply of energy we may also be linked to adverse impacts in this area through our energy supplier.

As a part of our work with environmental sustainability we have established guidelines for our employees on how to handle heating lamps and other electronic machines, reading our electricity meter once a month to keep track of our use of energy, thereby being able to identify anything abnormal/any adverse impacts.

In 2020 we switched our energy at the restaurants to 100% green energy. For every kWh of energy consumed at our restaurants, a corresponding amount of energy has been produced from a green energy producer with a sustainable production. Benefits includes covering our electricity consumption with certified electricity, supplied by hydropower plants or wind turbines, we are sending a clear green signal to the rest of the world and last but not least, we as a company actively contributes to promote the demand for sustainable energy, such as hydropower and wind power.

We will as a part of our 2022 strategy require of our suppliers to conduct and submit regular impact assessments on social, environmental and economic sustainability and ask of our supplier of energy to assess their potential adverse impacts on this specific issue.

ANTI-CORRUPTION



ANTI- CORRUPTION

NEPOTISM

In terms of cronyism and nepotism, we acknowledge that Pluto group may have adverse impacts regarding this area. Therefore, we have developed procedures that forbid any form of nepotism. Anyone who recommends someone for an internal position or as a supplier or contractor, shall not be involved in the hiring decision.

The decision is made by a senior member and made as a majority decision. This also applies for executive managers.

The activities of Pluto group demand clear and defined competencies. By adding other criteria, the risk of nepotism and conflicts of interest might grow. Pluto group recognizes that clearly defined job descriptions minimize the risk of nepotism and conflicts of interest. Just as it is an expectation in relation to the right to work - consider the human rights impact assessment.

BRIBERY

In terms of bribery of any sort, we acknowledge that Pluto Group may have adverse impacts on risks regarding corruption. To minimize these risks, Pluto Group will as a part of our 2020 develop explicit guidelines and wording on anti-corruption for our staff manual to improve

transparency and predictability concerning acceptance of gifts and procedure for approval.

We are embedding anti-corruption as an element of training of new employees, as well as a gift log noting gifts of a total value pr. year > EUR 250.

MEASUREMENTS OF OUTCOME

PRODUCT ANALYSIS

In are analyzing our food products to assess the potential in buying more organic and to help form a clear strategy. We will continue analyzing and improving our food products, in order to become as sustainable as possible.

Further, we will together with REGA do a qualitative assessment of incoming packaging as a part of the project "The 10 principles in the value chain".

STAFF SURVEY

We do a yearly employee impact survey and employee satisfaction survey, which work as an "employee feedback system". The ensures that our employees have the possibility to give feedback and express their concerns and/or experiences, related to Human Rights and Labour, Environment and Anti-corruption. Through the survey we can measure incidents that can help us become aware of concerns regarding the different areas and what we need to improve.

We do a statutory workplace assessment every third year. The workplace assessment contains an assessment of our safety, health and well-being at Pluto Group. It also contains an action plan and an overview of which actions that should be implemented.

REGA AUDIT

In spring 2022 we will have our first REGA audit.

All members of REGA has two years to implement the global minimumstandard of corporate social responsibility.

For the REGA audit we are comitted to meet following requirements:

- A public policy statement, that fulfill FN's & OECD's requirements
- II. Impact assessments on environment, human rights and anticorruption
- III. A code of conduct for Business Relations
- IV. Feedback mechanisms
- V. A conducted impact survey
- VI. Publicly available communication on our work with social responsibility