

Environmental, Social and Governance (ESG) Policy

1. Introduction

1.1 Our commitment

At Netceed, we strongly believe that it is in the mutual interest of both Netceed and our business partners to create a positive impact on our planet and communities.

We are shaping the future of communications networks across the globe by providing reliable and sustainable solutions for the telecom and energy sector. We’re committed to what we do and the connections we create.

As sustainability is becoming an even more critical factor for the future of business, our company strives to act responsibly towards the environment and the people taking part in the development and delivery of our solutions and services. We recognize that our operations have an impact on the environment and our society, and we are committed to minimizing the negative impact and promoting positive impacts, whilst delivering solutions to our customers worldwide.

Netceed’s Environmental, Social and Governance (“ESG”) Policy defines our core principles for doing business and managing our operations in an ethical way that supports our values, commitment to business integrity and compliance with legal requirements. This policy is an integral part of our Code of Conduct.

1.2 Scope of the policy

The scope of this ESG Policy applies to all Netceed employees, legal entities, and business units. This Policy also applies to those who are bound, directly or indirectly, to Netceed through a consultancy or service agreement. It also aims to apply to all our stakeholders, particularly to our clients, suppliers, and local communities where we operate.

2. Our ESG priorities

Netceed recognises that some ESG topics are more important for us to manage as a business than others. The important topics we have identified are in the table below:

Environmental	Social	Governance
<ul style="list-style-type: none"> • Climate change and energy management • Circular economy and waste management • Product eco-design and extending lifecycle of products 	<ul style="list-style-type: none"> • Diversity, equity, inclusion, and belonging • Human rights and labour standards • Health and safety 	<ul style="list-style-type: none"> • Business ethics and conduct • Cyber-security • Anti-trust / competition • Sustainable supply chain • Product quality and safety

3. Management of ESG topics

3.1 Environmental topics

3.1.1 Climate change and energy management

In light of the urgent need to address climate change and its potential impacts on our world, we remain steadfast in our commitment to sustainability as a central pillar of our business strategy. Netceed firmly believes that it is our responsibility to take a proactive stance and contribute to mitigating climate change.

We calculate, monitor and report our Scope 1, Scope 2 and, where possible, material Scope 3 Greenhouse Gas (GHG) emissions, as well as our (renewable and non-renewable) energy consumption. We aim to set carbon emission reduction targets and develop a decarbonisation strategy to reduce our energy usage and carbon emissions to align with the objective of 2015 Paris Agreement.

We expect our suppliers to set similar ambitions within their own operations and supply chains.

3.1.2 Circularity and waste reduction

Circularity and waste reduction are critical topics in our industry. We are reducing waste generation through responsible waste management practices. We have already seen improvements in waste separation at the business units' level, reflecting an increased level of awareness and commitment among our employees.

As we move forward, we will continue to prioritize waste management.

3.1.3 Product eco-design and extending lifecycle of products


We encourage the use of refurbished and recyclable materials in our products and packaging. Our group remains dedicated to finding innovative solutions that minimize waste generation and maximize recycling efforts to contribute to a cleaner and healthier environment for future generations. We already design products with eco-design rules in mind for our products to be more energy-efficient, use more sustainable materials, and be better prepared for product reuse.

3.2 Social topics

3.2.1 Diversity, equity, inclusion and belonging (DEI&B)

Netceed is committed to fostering, cultivating, and preserving a culture of diversity, equity, inclusion and belonging.

We want to leave no room for unequal treatment or disadvantage across all aspects of our operations and we expect our workforce to embody the values of mutual fairness and respect. We do not tolerate discrimination, prejudice or bullying.



Our commitment to DEI&B is applicable, but are not limited to, our practices on recruitment and selection; compensation and benefits; professional development and training; promotions; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of diversity, equity and inclusion.

We will always aim to make an accommodation to the known physical or mental limitations of qualified employees with disabilities to promote inclusion and belonging.

Our initiatives include:

- Leadership-level support for DEI&B initiatives
- Unbiased hiring practices
- Support to mentorship and sponsorship opportunities

Netceed recognises the importance of DEI&B and follows all legislation, regulations, and codes of practice in relation to the topics. This policy is an integral part of Netceed Code of Conduct.

3.2.2 Human rights and Labour standards

In line with our Code of Conduct, we encourage dignity, equality and respect for fundamental human rights, fair labour standards and freedoms, both in our organization and in our value chain. This includes arrangements around contract types (e.g., zero-hour contracts), minimum wages and union representation within its sites and suppliers. We do not tolerate forced labour or child labour in our organization or within our supply chain, and do not work with providers or partners that infringe fundamental human rights.

Netceed is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. Our Modern slavery and Human trafficking Statement in the United Kingdom is compliant with the Modern Slavery Act 2015. It reflects our ongoing commitment to acting ethically and with integrity in all our business relationships. We will continue to improve our practices, benchmarking ourselves against peers and ensuring our systems and controls to safeguard us against any form of modern slavery or human trafficking remain effective.


The group recognises the importance of Human rights and Fair labour standards and follows all relevant legislation, regulations, and codes of practice in relation to these rights and standards.

3.2.3 Health and safety

Health and safety are a top priority for Netceed. We promote the health and safety of our employees, client, contractors, and visitors through various trainings, preventive measures, and regular inspection of safety risks.

Netceed tracks and reports on occupational health and safety incidents.

The group recognises the importance of health and safety and follows all relevant legislation, regulations, and codes of practice in relation to health and safety.



3.3 Governance topics

3.3.1 Business ethics and conduct

We are committed to conducting all aspects of our business in keeping with the highest legal and ethical standards and expect all employees and other persons acting on its behalf to uphold this commitment.

Netceed operates fairly and honestly and only acquires information about our competitors by legal and ethical means. Our staff and representatives must not engage in any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers and/or restrict supply.

We do not engage in money laundering, and we take appropriate measures to prevent it by reporting suspicious transactions. We are open, honest and ethical in all dealings and operations. We never participate directly or indirectly in any act of bribery or corruption. From time to time, we may provide gifts, meals, entertainment or travel to third parties. We never do so in return for any business services or confidential information, or to bias a decision.

Every manager is responsible for monitoring compliance with the Code of Conduct and other Group standards and procedures to provide assurance to senior management and the Board that effective controls are in place, expected results are being achieved, and to report potential violations of the Code and results of subsequent investigations to Group Human Resources Director and the Executive Board.

3.3.2 Cybersecurity


Our organization is committed to safeguarding our information systems and data from cyber threats. We respect the privacy of our staff and will only take an interest in what employees do outside of work if it affects Netceed's reputation or legitimate business interests. We only use personal information to the extent needed for Human Resources purposes and in any event in compliance with applicable laws.

Our IT department implements and maintains cybersecurity measures, conducts regular system audits, and responds to security incidents. Some of our entities already have been certified ISO 27001 and we will continue to expand our certification coverage.

3.3.3 Sustainable supply chain

The sustainability challenges that we face often require us to engage beyond our own operations. That is why, we expect our suppliers to share our commitment to sustainability. By signing a contract or an agreement with Netceed, our business partners and suppliers agree to commit to our supplier Code of Conduct, which define our expectations regarding sustainable supply chain.

We will continue to engage with our suppliers to work towards our ambitions, starting with the topics of decarbonization and sustainable offer.



3.3.4 Product safety and quality

We are committed to responsible product stewardship. This is reflected in our approach towards the selection and qualification of suppliers, installation, and delivery of our products and services.

In line with mandatory legislation all over the world, Netceed is committed to placing only safe products on the market.

In 2024, some of our facilities will pass the ISO 9001:2015 quality management system certifications.

4. Governance of ESG

4.1 Compliance with laws and regulations

Netceed is compliant with the letter and spirit of applicable laws, relevant standards, policies and regulations regarding anti-corruption, anti-bribery, anti-money laundering, human rights, occupational health and safety, labour standards, and environmental sector specific legislation. Netceed aims for a positive and co-operative relationship with all regulatory authorities. Netceed regularly engages with regulators and other stakeholders to ensure compliance with upcoming laws, regulations, and standards.

In addition to complying with relevant laws and regulations, Netceed has established a set of internal enforceable standards which are contained in the documents below and should be read in conjunction with this policy:

- Code of Conduct
- Anti-Corruption Policy
- Whistleblowing Policy
- Third Party Due Diligence Policy

A Whistleblowing Policy platform is also in development.

4.2 Process of internal reporting

Netceed is committed to having a transparent and listening culture, where anyone who works for, or on behalf of the organization, feels comfortable raising concerns. We encourage all our employees, alongside any stakeholders who may be impacted by our operations, to speak up.

4.2.1 Overview of internal reporting channels for employees and/or reference to relevant policies

Our employees have the option to report confidentially any incidents of compliance breaches via internal channels by communicating with their supervisor, Human Resources or the Group General Counsel.

4.2.2 Overview of internal reporting channels for contractors, suppliers, and communities and/or reference to relevant policies

Any incidents of compliance breaches should be reported by contractors to the Group General Counsel, by suppliers to a Head of Procurement and the Group General Counsel, by members of local communities to the Group General Counsel, and by shareholders to the Group CFO and the Group General Counsel.

Netceed tracks and reports on employee grievances.

4.3 Responsibilities

At the board level, the Group Chief Financial Officer (CFO) has responsibility for oversight of ESG at Netceed, including implementation of our ESG policy and periodic review of ESG performance.

In 2024, Netceed will establish an internal ESG Steering Committee which includes members of senior management, reporting to the Board. The ESG Steering Committee is chaired the Group Sustainability Lead and meets regularly.

The Group Sustainability Lead is responsible for identifying ESG risk areas and opportunities, as well as developing ESG priorities and action plans and for overseeing the implementation of the ESG strategy. This work will be reviewed by the ESG committee and approved by the Board.

This policy is reviewed annually and is approved by the Board of Directors. The ESG policy is owned by the Group CFO.

Signature

DocuSigned by:

D99F9D6346854AD...

Mathieu Sarday
20 March 2024

About the policy

Document name	Netceed Environmental, Social and Governance Policy
Document version	1
Start date valid	March 20 th , 2024
Date for next review	March 20 th , 2025
Related document	Netceed Code of Conduct