

ESG Policy

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1. Purpose

euNetworks Group Holdings Limited ("euNetworks" or "Company" or "us" or "we") is committed to promoting sustainability. Concern for the environment and the promotion of a broader Environmental, Social and Governance (ESG) agenda are integral to euNetworks' activities and the management of the organisation. We strive to follow and to promote future-proof sustainability practices, to reduce the environmental impacts of our operations and to help our customers, vendors and suppliers to do the same.

As referenced, some activities within the Scope of this ESG Policy ("Policy") are covered by additional dedicated policies, which are implemented collectively in order to deliver the objectives of this ESG Policy.

2. Scope and Application

This Policy applies to all persons working for euNetworks, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and individual temporary or fixed term contractors, wherever located. It is also intended to apply to our relationships with third parties: Customers, Suppliers, Investors and other stakeholders.

This Policy does not form part of any contract of employment or any other contract, including to provide or to acquire goods, services, financing or investment and we may amend it at any time.

3. Responsibility

Monitoring and managing this Policy is of high priority to euNetworks. We have appointed a Sustainability Committee of the Board and a Sustainability Steering Committee led by the Senior Director, Sustainability and comprising senior leaders in the business.

The Board and the Leadership Team are responsible for euNetworks' Values and ensuring that we are a values-led business.

The Sustainability Committee is delegated by the Board to have overall responsibility for the Policy and for ensuring the Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Sustainability Steering Committee has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it and monitoring internal control systems and procedures to ensure they are effective in managing the matters set out in this Policy.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issues covered by it.

These Committees will ensure that initiatives are undertaken effectively in accordance with this Policy, related action plans and applicable laws, rules and regulations. They will monitor and manage sustainability activities through:

- Annual ESG Report that is designed to provide transparency around euNetworks' ESG approach and progress by reporting on overall sustainability vision, targets, material topics, key performance indicators.
- ESG Policy and euNetworks' ESG Strategy that are reviewed annually by the Sustainability Committee, taking into account our developing understanding of the scale of challenges, our own performance and emerging opportunities.
- Reporting against Sustainability Linked Financing KPIs.

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4. Values

euNetworks is a values-based company and our values are as set out below. Our values are reflected in the purpose and principles and content of this Policy.

- Relentless Customer Obsession: We breathe, sleep, and live for our Customers.
- Pioneering Innovation: No status quo - only tomorrow's breakthroughs.
- Unbreakable Reliability & Security: Safe, sound, and always on.
- Trusted Market Leader: We own the market by owning our commitments.
- Integrity in Action: We do the right thing - even when no one's watching.
- Drive Impact: Every action matters - make yours count, together.

5. Scope

To realise our sustainability purpose and to live our values, our commitment extends to our people, customers, supply chain, investors, and wider stakeholders.

Through partnership with the HR, Procurement, IT, Operations and Marketing teams, the Policy and its relevant updates are disseminated to all stakeholders.

6. Principles

This Policy is based upon the following principles:

- To maintain a balance between four sustainability pillars: People, Planet, Prosperity and Partnerships and to integrate sustainability considerations into all our business decisions.
- To comply with, and exceed where practicable and appropriate, all applicable local laws, legislation, regulations and codes of practice.
- To disclose ESG commitments and performance against targets, including in an annual sustainability report.
- To identify, assess and reduce carbon emissions of our operations through engagement and collaboration with our supply chain and to achieve Net Zero by 2040.
- To have regard to internationally recognised responsible business and responsible investment frameworks in the development of our policies, including the Ten Principles of the UN Global Compact, the PRI Primer on Responsible Investment in Infrastructure, and the International Finance Corporation Performance Standards or similar best practice standards, to the extent relevant and appropriate to our business.
- To perform regular sustainability risk evaluations across our business to identify sustainability related challenges that could impact financial performance in the short and long terms.

7. The Policy

This Policy addresses relevant commitments and actions covering four sustainability pillars: People, Planet, Prosperity and Partnerships.

7A. Planet

euNetworks recognises the importance of natural resources and the environment to sustaining life. We are committed to protecting the environment, including preventing pollution to air, water and land, across all of our operations. We embed the mitigation of environmental impacts on land, sea and air into all decision-making processes. We will continue to develop our

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environment management system, setting clear targets for the reduction of emissions, energy and fuel consumption, water and waste management, and we will continuously review and rectify our performance against these targets. We are also committed to continually improving our environmental performance, going beyond compliance where reasonably practicable. The Company further commits to:

7.1. GHG Emissions Management

- Apply a precautionary approach to environmental risks and challenges, taking early and proportionate action to avoid or reduce harm even where full scientific certainty is not yet available.
- Measure, monitor and report our Greenhouse Gas (GHG) emissions annually, covering Scopes 1, 2 & 3.
- Set GHG emissions reduction targets through Science Based Targets initiative (SBTi) to achieve Net Zero by 2040.
- Participate in efforts to prevent air, water, land and sound pollution and to take urgent action to mitigate climate change risks.
- Continue annual CDP and GRESB reporting to communicate our climate related achievements in the areas of GHG emissions, energy consumption, sustainable procurement, evolution of supply-chain practices and an overall management of the climate-related risks and opportunities.

7.2. Energy Management

- Procure materially all of our energy from renewable sources across our owned sites.
- Work with our partners to drive adoption of renewable energy in third party owned sites.
- Encourage employees to use greener alternatives to traditionally powered cars and aircrafts to limit CO2 emissions from travel and transportation.

7.3. Ecological Impact

- Promote, preserve and regenerate biodiversity in the communities in which we live and work.
- Engage local communities as one of the stakeholders to conserve wildlife and biodiversity, when applicable.
- Build partnerships with governmental and NGO organisations in support of activities to conserve life on land and under the sea, including sustainable interaction with oceans, seas and marine resources.

7B. People

euNetworks is committed to developing a workforce that reflects the diverse communities in the locations in which we operate, helping our people achieve their true potential and managing the risks to anyone affected by our operations. The Company further commits to:

7.4. Labour Practices

- Follow all relevant labour laws, legislation and living wage standards.
- Favour a competitive, stimulating and fair remuneration structure.
- Apply best practices to ensure fairness and consistency in hiring processes and management's conduct towards employees.

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7.5. Development and Growth

- Foster a culture of internal development and growth. We encourage all staff to take responsibility for learning new skills and acquiring knowledge to develop their careers and achieve their work potential. We will ensure that sufficient support is in place to allow this.

7.6. Employee Diversity, Equity & Inclusion (DE&I)

- Building a diverse and inclusive workplace, giving all employees equitable opportunities and a safe environment to work in.
- Prevent any discrimination based on sex, race, colour, nationality, religion or belief, marital or civil partner status, gender reassignment or gender identity, pregnancy or maternity/paternity, ethnic or national origin, age, disability and/or medical history or sexual orientation.
- Support a working environment that is accessible and welcoming for people of all physical, mental and learning abilities.
- Measure, monitor and report DE&I metrics (as allowed by local laws), focusing on committed targets and bringing in initiatives to improve on them.
- Respect employees' rights to freedom of association without interference and free from discrimination from euNetworks.

7.7. Employee Health & Safety (H&S)

- Create a work atmosphere that engenders a sustainable work-life balance, reinforcing employee satisfaction, cultivating a sense of ownership, driving motivation and enhancing productivity.
- Develop robust routine practices and monitoring systems to ensure the health and safety of all our employees, contractors, customers and members of the public who may be affected by our operations. euNetworks' Health & Safety Policy is reviewed by management as required.
- Ensure proper training, supervision and instructions are provided to employees in matters pertaining to their H&S.
- Build a healthy workplace culture to enhance employee mental-wellbeing.

7.8. Human Rights & Community Relations

- As a signatory of the United Nations (UN) Global Compact, respect and support internationally recognised human rights standards and prevent any and all actions regarded as human rights violation in our operations and supply chain, in accordance with our statement against modern slavery.
- Prevent the use of child labour, forced labour or coercion, including physical punishment, in any of our operations.
- Compliance with our Anti-slavery and human trafficking policy. Continuously improve our practices, to identify and eliminate any potential slavery and human trafficking in our supply chains, and to act ethically and with integrity in all our business relationships.

7.9. Customer Privacy

- Maintain the integrity of information and guarantee data protection & customer privacy in accordance with our policies and procedures, and in compliance with all relevant national and international laws and regulations. All employees must keep confidential information confidential.

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7.10. IT Security

- Maintain IT Security as a fundamental part of the business and continue using a range of best-in-class technology to detect, prevent & respond to the increasing threat landscape. The Company's CTO has overall responsibility and is empowered by the Leadership Team in this area.

7C. Prosperity

euNetworks strives to empower its Customers to make more sustainable choices, to deliver sustainable returns to its investors and to act as a good corporate citizen. The Company further commits to:

7.11. Business Ethics

- Compliance with our Business Ethics Policy.
- Comply with all laws, codes and regulations.
- Operate ethically and with integrity and full transparency.
- Exercise legitimate and fair business practices, which we consider the norm, and ensure the highest standards of ethical conduct and fair dealing in our relationship with all stakeholders.
- Under no circumstances, pay or accept bribes, or make or receive improper payments. We comply with the anti-corruption treaties and laws of the countries in which we operate. In particular, we will not, under any circumstances, offer, promise, pay, give, solicit, accept, or authorise the payment / giving of money or anything else of value (directly or indirectly), to or from:
    - o any Government Official to: (i) influence any act or decision of a Government Official in their official capacity; (ii) induce a Government Official to use their influence with a government; or (iii) otherwise secure any improper advantage; or
    - o any person in any manner that would constitute bribery or an illegal kickback, or would otherwise violate applicable anti-corruption law.
- Not to breach Sanctions, become a Sanctioned Person or deal with any Sanctioned Person (either directly or indirectly).
- Maintain books and records for seven years following the date of their creation (or for such longer period as may be required under applicable law) and maintain internal controls to ensure that:
    - o receipts and expenses are accurately recorded with reasonable detail and are based on accurate and sufficient supporting documentation; and
    - o no "off the books" accounts are created or maintained.
- For the purposes of this Policy, the detailed description of the terms used in Section 7.11 are set out in Annex A.

7.12. Systemic Risk Management

- Implement a robust company-wide Risk Management System that is reviewed on an annual basis. The Risk Management System includes business impact, practice and test plans, crisis management and specific recovery plans to ensure adequate delivery of all products and services to our customers 24x7x365.

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7.13. Supply Chain Management

- Raise our supply chain vendors' awareness of euNetworks' commitment to sustainable development and the need for continual improvement.
- Monitor compliance with this ESG Policy and euNetworks' Supplier Code of Conduct that is designed to engage with Suppliers that share a common sustainability ambition to advance social and environmental sustainability.
- Perform good conduct in business and risk management, covering all areas of the business, in a responsible manner and in compliance with applicable laws and regulations, including requirements regarding Anti-Modern Slavery, Data Privacy, Bribery and Corruption, as covered in more detail in our Supplier Code of Conduct.
- Monitor Suppliers' environmental and social performance to ensure compliance in the supply chain. To enable effective performance evaluation and dialogue, euNetworks reserves the right to request sustainability performance data from Suppliers. Suppliers may also be subject to Supplier Evaluation Questionnaire for tracking and continuous improvement.

7.14. Materials Sourcing and Efficiency

- Specify sustainability requirements for our suppliers in the Supplier Code of Conduct and integrate these conditions into the Company's overall procurement process. We have included guidelines for responsible, sustainable and ethical sourcing of goods and services in our Supplier Code of Conduct and expect all our suppliers to adhere to these standards. We take active steps continuously to increase sustainability in our supply chain. Our supplier questionnaire includes relevant questions to assess whether material suppliers are able to meet our sustainability requirements within 12 months, and requests further details if suppliers need to create an action plan to comply with our operating requirements.

7.15. Physical Impacts of Climate Change

- euNetworks' Audit Committee has oversight responsibility of management's efforts for identifying, monitoring and managing major risks to our business, properties, employees, customers, supply chain and wider stakeholders. The Leadership Team is continuously evaluating risks to operations, facilities, strategic opportunities, and financial concerns, and documenting the results to the company's Risk Register, which is reviewed annually and considers risks that emerge on both a short and long-term timescales. This process identifies potential operational, financial or strategic risks which may have substantive impacts, establishes mitigation costs and presents a business case, which can be reported to the Audit Committee.

7.16. Taxes

- To pay our taxes as a good corporate citizen and not to engage in schemes or structuring to avoid paying appropriate taxes in the jurisdictions in which we operate.

7.17. Sustainability Linked Financing

- To maintain a link between the financing we receive and this Policy through the agreement of appropriate KPIs with our lenders.

7.18. Alignment with International Standards

- Have regard to the IFC Performance Standards on Environmental and Social Sustainability, or similar recognised best practice standards, in developing and reviewing our environmental and social management approach.

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- Assess the materiality of each IFC Performance Standard to our operations on a periodic basis. Where a standard, such as those addressing land acquisition and resettlement, indigenous peoples, or cultural heritage, is assessed as not currently material to our business, this will be documented and reviewed as our operations evolve.
- Support our investors' responsible investment obligations, including those set out in the PRI Primer on Responsible Investment in Infrastructure, by maintaining transparent ESG disclosure, responding to reasonable investor stewardship and engagement requests, and aligning our reporting with the expectations of our lenders and investors.

7D. Partnerships

We are committed to universal sustainability principles and to socially responsible business practices, driven through our Leadership Team and broader company governance. We aim to create shared value in the communities in which we operate. The company further commits to:

7.19. Community Engagements

- Achieve more in collaboration efforts with strategic partners within the industry and the local community organisations where we operate.
- Establish and maintain the highest standards of corporate social responsibility in our business activities. We strive to be a good corporate citizen by contributing to the well-being of local communities through our decisions in day-to-day operations.
- Formally encourage and support our employees to volunteer and participate in community activities.

7.20. Branding and Reputation

- Continuously research and evaluate potential impact partnerships, industry and global sustainability forums, groups, task forces and think tanks.
- Manage sustainability and its impacts from a social perspective. Communicate the initiatives with the stakeholders effectively, with reference to contribution to the various UN Sustainable Development Goals.

8. Communication

We will communicate this policy both internally and externally, making it available with supporting documents on the company's Intranet, Customer Portal, and Vendor Onboarding Pack.

It is the responsibility of all people within euNetworks to support this Policy and our commitments to Planet, People, Prosperity and Partnership. We rely on the support of our other stakeholders to help us to achieve these commitments, including by complying with our Supplier Code of Conduct.

This Policy is an invitation to engage in dialogue. euNetworks welcomes your questions, comments, and suggestions.

For further information related to this ESG Policy, please contact:

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9. Annex A - Terms

- "Government Official" refers to any official or employee of any multinational, national, regional, or local government in any country, including any official or employee of any government department, agency, commission, or division; any official or employee of any government-owned or -controlled enterprise; any official or employee of any public educational, scientific, or research institution; any political party or official or employee of a political party; any candidate for public office; any official or employee of a public international organisation; and any person acting on behalf of or any relatives, family, or household members of any of those listed above.
- "IFC Performance Standards" means the International Finance Corporation's Performance Standards on Environmental and Social Sustainability, or such other similar internationally recognised best practice environmental, social and governance standards as may be adopted by the Company from time to time.
- "Person" means any individual, or legal entity, including a corporation, limited liability company, voluntary association, joint stock company, business trust, or partnership.
- "Precautionary Approach" means taking early and proportionate action to avoid or reduce environmental harm in circumstances where full scientific certainty is not available, consistent with Principle 15 of the Rio Declaration on Environment and Development.
- "PRI Primer" means the PRI Primer on Responsible Investment in Infrastructure, published by the Principles for Responsible Investment (PRI), which sets out how the six Principles for Responsible Investment apply to investment in infrastructure.
- "Sanctions" means any economic or trade sanctions or restrictions administered or enforced by the United States (including the Office of Foreign Assets Control of the U.S. Department of the Treasury ("OFAC"), the U.S. Department of State, and the U.S. Department of Commerce), the European Union, or the United Kingdom.
- "Sanctioned Person" means any person that is (a) the target of Sanctions, or (b) located, organised or ordinarily resident in any Sanctioned Territory, or (c) owned or controlled (as defined by the relevant Sanctions) by Person(s) described in (a) or (b), as a result of which such owned or controlled Person(s) are subject to the same prohibitions or restrictions as the Person described in sub-paragraph (a) or (b); and
- "Sanctioned Territory" means any country or territory subject to comprehensive Sanctions.
- "Ten Principles of the UN Global Compact" means the ten principles covering human rights, labour, environment and anti-corruption published by the United Nations Global Compact, of which euNetworks is a signatory.

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