Fenergo Limited

Environmental, Social & Governance (ESG) Policy

29th July 2022
Version Control Document

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Approved/Reviewed By: Niall Twomey

Next review due: 29th July 2023
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1. INTRODUCTION TO THE POLICY

Ambition:
All aspects of Fenergo’s business are focused on fostering environmental sustainability, promoting social responsibility, and ensuring effective corporate governance. Our mission is to seek to identify areas of risk and opportunity to ensure that our business decisions and policies address opportunities for creating a sustainable future as well as meeting in-scope regulatory enforcements. In Fenergo we take our sustainability goals very seriously, and we will strive to enhance our efforts in sustainability initiatives, continuing to be transparent and honest as we look ahead with hope for our planet.

Scope of the policy:
This Policy applies to all Fenergo employees (including C-Suite members and Directors) and locations worldwide, as well all business partners and suppliers (where relevant). It will act as the umbrella policy that will sit above any specific environmental, social and/or governance policies. This Policy sets out the environmental, social and governance (ESG) topics which are most material for Fenergo and our operations and how we manage these.

Contact:
All questions regarding this Policy should be addressed to the Risk & Compliance Team.

2. OUR EMPLOYEES

Fenergo’s most important resource is its employees. As such, we are strongly committed to:

2.1. Employee development, engagement, and retention. Employee development is an area Fenergo is committed to enhancing. At Fenergo, annual training budgets are allocated to each team to use at the discretion of team leaders. An online platform, Fenergo University, provides employees with access to a variety of training programmes. For all employees, there is a year-end review to facilitate discussions around performance and development. This process is conducted transparently using a centralised HR platform to coordinate the discussion between employee and manager. In addition, Fenergo provides opportunities through surveys for employees to submit feedback and questions for the company.

2.2. Employee wellbeing. At Fenergo we strive to support the wellbeing of all our employees. We do this through a series of regular wellbeing webinars with mental health specialists and providing employees access to weekly Yoga Classes.

2.3. Diversity, equity, and inclusion (DEI). Fenergo is committed to promoting diversity, providing an inclusive and welcoming environment for all members of our community, and to ensuring that employment decisions are based on individual abilities and qualification. Our DEI statement captures our commitment to inclusion and diversity. This commitment starts at the top and we expect leaders at all levels to help create and sustain an inclusive environment.
Our ambition is to be an inclusive and diverse company. We believe our diversity makes us stronger, more innovative and we embrace diversity as a source of innovation, creativity, and competitive advantage.
Inclusion and diversity are fundamental to our culture. We believe that no one should be discriminated against because of their differences, such as age, disability, ethnicity, gender, gender identity and expression, religion, or sexual orientation.
We work hard to build a workplace where everyone feels welcome, and all voices are heard.

2.4. Health & safety. The health and safety of each of our employees, customers, contractors, and other visitors is of fundamental importance to Fenergo. Fenergo’s offices/locations worldwide adhere
to the company’s global H&S (Health & Safety) Policy in addition to set health and safety standards relevant to their specific location and operation, with an appointed responsible person responsible for monitoring compliance. Key H&S risks (including those associated with homeworking) are assessed and managed routinely. Please see the Health & Safety Policy for more details.”

This overarching ESG policy is supported by underlying policies and statement relating to our employees, including:

- Employee Code of Conduct
- Health & Safety Policy
- Diversity, Equity, and Inclusion Statement

3. **OUR CLIENTS & PRODUCTS**

Fenergo is committed to providing our clients with the highest quality products and services / experience, whilst upholding elevated levels of transparency and responsibility.

**3.1. Understanding and responding to client satisfaction.** This is of critical importance to the success of Fenergo. In Fenergo, we continuously monitor client needs and find creative ways to better address those needs. We respond rapidly to client inquiries and seek to promote the benefits of long-term relationship building and repeat customers. Our CSM (Customer Success Manager) are regularly in contact with our Clients, to ensure we are continuously improving the client experience.

**3.2. Product responsibility and safety.** At Fenergo we believe it is critical to uphold ambitious standards of product responsibility and safety. We strive to understand how our products are impacted by the sustainability agenda and the opportunities that could be realised by offering more positive environmentally and / or socially aligned products.

**3.3. Data security and protection:** Fenergo deploys bespoke Fen-Cloud environments for clients with the specific configuration and security controls, as contractually agreed. For other products, the configuration and security controls are designed in line with industry good practice and are documented in their respective topologies and product documentation.

**3.4. Business partner and supply chain management.** Fenergo is committed to having commercial business relationships with only those that are performing their business activities in full compliance with the laws, rules, and regulations of the countries in which they operate and that they conduct their business in an ethical and socially responsible manner, including the management of modern slavery and human rights risks. A provision with Fenergo’s right to terminate Third Parties for convenience is also included in the contracts. Fenergo commits to integrate environmental and social risks into the assessment of potential suppliers before contracting.

This overarching ESG policy is supported by underlying policies relating to our clients and products, including:

- Fenergo Supplier Code of Conduct
- Data Protection Policy

4. **OUR ENVIRONMENTAL IMPACTS**

At Fenergo, we understand the urgency with which society and businesses must address the impacts of climate change. As such, we are committed to minimising our impact on the environment. Due to the nature of our activities, our main environmental impacts relate to:

**4.1. Climate change / transition to net zero.** At Fenergo, we acknowledge our role in the transition to the low carbon economy as well as the risks and opportunities that this presents. Through reducing and offsetting excess GHG emissions, we aim to lower our year-on-year carbon footprint. Through
improving energy efficiency at our offices, switching to more energy efficient providers of IT services, promoting a hybrid working model and limiting business travel, we aim to lower our carbon footprint and achieve net zero by 2050 by using science-based targets.

- **Energy consumption** (and associated greenhouse gas (GHG) emissions). Fenergo is committed to reducing GHG emissions by implementing energy efficiency initiatives at each office location. We are also reviewing the energy efficiency of our IT infrastructure and are considering moving to third party providers that implement energy efficient initiatives and/or utilise renewable energy to lower their carbon footprint.

4.2. **Travel management.** Fenergo can reduce its environmental impact by limiting business travel. At Fenergo we are encouraging employees to only travel when necessary and to use video conferencing as much as possible. Fenergo’s priority is to ensure corporate travel is closely monitored and managed centrally.

4.3. **Climate risk.** We should be concerned with understanding and managing climate risk and how it impacts our operations, including our supply chain by carrying out an impact analysis and contingency plan.

4.4. **Waste management and circular economy.** Fenergo is committed to waste minimisation and recycling across all our locations / operations. Due to the nature of our activities only small volumes of office waste is produced by our operations; however, Fenergo locations / offices practice responsible waste and recycling programmes and strive for zero waste to landfill. Part Fenergo’s waste elimination programme was the elimination single-use cups and cutlery and the encouragement of employees / customers to use reusable containers. Furthermore, Fenergo commits to donate to charities any unused or old technology, such as laptops and mobile phones, where they are given a second life.

This overarching ESG policy is supported by underlying policies relating to environmental impact, including:
- Hybrid Working Policy

5. **OUR APPROACH TO GOVERNANCE**

At Fenergo we are committed to Governance and have a strong focus on the following areas which are important to our business and operations:

5.1. **Legal compliance.** Fenergo is committed to maintaining compliance with legal requirements in the regions where it operates and uses legal advisors to provide support where needed in addition to its dedicated legal staff.

5.2. **Business ethics:** It is our policy to conduct business in an honest and ethical manner and ensure compliance with all relevant legal and regulatory requirements related to the following areas:

- **Anti-bribery and corruption (ABC).** We take a zero-tolerance approach to bribery and corruption and are committed to acting with integrity. We monitor our client engagements / sales process to ensure that bribery and corruption risks are avoided and in line with our Code of Conduct. We also build employee awareness of this through training provided during the onboarding stage.

- **Gifts and hospitality.** We believe that we should not receive benefits of any kind from third parties which might reasonably be seen to compromise our personal judgement and/or integrity. Please refer to our Code of Conduct which sets out our approach to the offering and receipt of gifts and corporate hospitality and applied to all entities, offices, and countries in which we operate.
- **Anti-trust or competition.** We operate based on the principle of fair trade and competition. As such we ensure all our activities conform with all applicable anti-trust regulations.

- **Anti-money laundering (AML).** We are committed minimising and preventing the extent to which [company name] can be used to further financial crime.

### 5.3. Whistleblowing procedures

Fenergo encourages all employees and external stakeholders who have serious concerns about any aspect of our operations to come forward and voice those concerns via our formal reporting system. We have an independent, anonymous whistleblowing mechanism which our employees, partners, and suppliers can use to raise any concerns or report any behaviour that breaches our policies. We have a robust structure in place to address and resolve the concerns raised. All whistleblowing reports are reporting to the Board in a timely and sensitive manner. Information on how to access this can be found on the Compliance page in Fenway here: https://fenway.fenergo.com/community/knowledge-management-and-training/compliance-training/pages/whistle-blowing.

Please refer to our Whistleblowing Policy for further information.

This overarching ESG policy is supported by underlying policies relating to Governance, including:

- Employee Code of Conduct
- Fenergo Supplier Code of Conduct
- Fenergo Whistleblowing Policy

### 6. POLICY INTEGRATION

We recognise the importance of gaining commitment to our ESG policy from all levels within our organisation: from senior management, internal functions, our employees, our partners, and our suppliers, all of which are responsible for adhering to the principles of this policy.

**Monitoring and reporting:**

Fenergo has agreed to a set of initiatives and Key Performance Indicators (KPIs) to reflect our key ESG issues as a business. Progress against these KPIs (see below) and implementation of this policy will be monitored quarterly by an ESG Committee (or equivalent) and reported to the Board annually.

The Fenergo Board has overall responsibility for ESG matters. The CEO, Marc Murphy, is responsible for owning this policy and will act as the designated point of contact responsible for collating reports from the ESG Initiative owners and synthesising an annual report for the Board. Individual ownership will be assigned to each initiative in line with the business area that it corresponds to.

**Key performance indicators:**

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<th>Topic</th>
<th>KPI</th>
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<tr>
<td>Climate and GHG emissions</td>
<td>- greenhouse gas (GHG) emissions (Scope 1, 2 and 3) measured in tCO₂e</td>
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<tr>
<td></td>
<td>• scope 1: direct emissions due to owned, controlled sources</td>
</tr>
<tr>
<td></td>
<td>• scope 2: indirect emissions due to purchase of electricity, heat, steam, etc.</td>
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<tr>
<td></td>
<td>• scope 3: all other indirect emissions [include business travel as a minimum]</td>
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<tr>
<td></td>
<td>• [all accounted for using the GHG Protocol]</td>
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<td>- renewable energy consumption as a % of total energy consumption</td>
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<td>Diversity, equity, and inclusion</td>
<td>- female employees as a % of overall headcount</td>
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<td>- female board* members as a % of overall board headcount</td>
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- board* members from under-represented groups as a % of overall board headcount (option to include LGBTQ+) [mandatory for US based companies, optional for rest of the world]

**Health and safety** - number of work-related accidents (including injuries, fatalities and number of days lost due to injury)

**Employee headcount**
- organic net new hires
  - the number of full-time equivalents (FTEs) joining the company, excluding hires that result from M&A) less attrition (the number of FTE leaving the business)
- total net new hires
  - new hires (the number of FTE joining the company, excluding hires that result from M&A) less attrition plus changes due to M&A (the net change in employees due to M&A)
- annual percent attrition
  - attrition (the number of FTE leaving the business) over the course of the year divided by average FTEs in previous year multiplied by 100

**Employee engagement**
- % employees responding to survey [optional]
- employee engagement survey score [optional]

* Includes both Topco Board and Executive Committee

**Exceptions:**
The CEO or the CTO, who is the ESG responsible person in the senior management team, must approve all exceptions to this Policy.

**Review:**
This ESG policy and underlying ESG-related policies will be reviewed on an annual basis by the CEO, the CTO or they relevant owners and updated if required to ensure that they continue to reflect our vision and commitments.