

Environmental Policy

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Definitions

- **"Associates"** refers to all directors, officers, managers, employees (full-time, temporary, or part-time), trainees, and interns of CACTUS or its affiliates, regardless of location.
- **"Environmental Aspect Impact"** is any part of an organization's activities, products, or services that affects the environment. An impact is a change to the environment caused by these activities, which can be either positive or negative.
- **"Environmental Protection"** means CACTUS's efforts to protect the natural environment. The objectives are to conserve natural resources, maintain the current natural environment, and, where possible, repair damage and reverse negative trends.
- **"Green Procurement"** refers to purchasing goods and services that have minimal adverse impact on the environment.
- **"Net Zero"** means balancing the amount of CO₂ we release into the atmosphere by removing an equal amount from it.
- **"Recycling"** is the process of reusing materials to produce new goods or services of the same quality.
- **"Reuse"** means using a component, part, or product again after it has been removed from its original service cycle. Reuse may involve cleaning, repairing, or refurbishing between uses, but not reformation.
- **"Waste"** refers to any output with no marketable value that is discharged into the environment, typically solid or liquid materials
- **"Workplace"** means any physical location under the organization's control where employees, contractors, and others perform work for the organization.

Policy Statement

At CACTUS, protecting and preserving the environment is one of our highest priorities.

We are committed to

- Complying with all applicable environmental regulations and striving to exceed them by adopting international standards and best practices in all areas of our operations.
- Developing, maintaining, and continuously improving our environmental management programs by setting SMART goals and targets to minimize our environmental footprint.
- Regularly reviewing our progress towards environmental goals and taking meaningful action to improve our performance.
- Embracing environmental protection and conservation by always using resources judiciously.
- Reducing our carbon footprint and working towards achieving Net Zero greenhouse gas emissions.
- Ensuring responsible energy use throughout our business, including conserving energy, improving energy efficiency, and favoring renewable over non-renewable energy sources when feasible.
- Conserving natural resources by reusing and recycling materials, purchasing recycled materials, and using recyclable packaging and other materials, thereby promoting green procurement.
- Adopting a sustainable waste management approach aligned with circular economy principles, including waste minimization, recycling, reuse, and eco-friendly disposal in accordance with regulatory requirements or industry best practices.
- Educating Associates and stakeholders about environmental protection to enhance their understanding and awareness of environmental issues.
- Engaging Associates, business partners, suppliers, and contractors in establishing environmentally friendly operations.

Purpose

Cactus Communications, including all its global affiliates ("CACTUS" / "the Company" / "we" / "our" / "us"), is deeply committed to environmental preservation and protection. We recognize the critical need to understand the environmental impact of our business operations and are dedicated to implementing proactive measures to minimize our carbon footprint and enhance our positive environmental impact.

CACTUS aims to contribute to a sustainable world by embracing innovative concepts and leveraging eco-conscious practices and technology.

Scope and Applicability

This Environmental Policy applies to all individuals acting on behalf of CACTUS globally, including all Associates working for or representing CACTUS (referred to as "you" or "your" in this Policy).

Our Approach to Meeting Our Commitments

To achieve our Policy statement and overall objectives, CACTUS employs various strategies, including:

- Identifying environmental Aspects and Impacts (AI) arising from our operations.
- Consistently measuring our environmental footprint related to emissions, water, waste, and energy across our operations.
- Developing and implementing clear procedures and work instructions to mitigate environmental impact.
- Establishing governance systems (such as office-specific environmental committees or appointing environmental executives) to enhance CACTUS's environmental performance.
- Identifying, monitoring, and ensuring compliance with relevant regulations, while staying updated on changes in the regulatory landscape.
- Fostering a culture of environmental consciousness through employee training and awareness sessions, office-specific environmental initiatives, and encouraging innovative ideas.
- Promoting sustainable behaviors among employees (e.g., turning off laptops/desktops during non-work hours, optimizing screen brightness, recycling and reusing, using eco-friendly products, minimizing printing, reducing plastic use in the office).
- Staying informed about the latest developments in environmental management and finding creative ways to implement new practices.
- Investing in technology (such as Green Coding, water tap sensors, efficient lighting systems, data platforms) to reduce our environmental footprint.
- Disclosing our environmental performance to our stakeholders.

Your Responsibilities

All Associates acting on behalf of CACTUS worldwide are expected to adhere to this policy. Here's a summary of the dos and don'ts:

Dos:

- Identify and implement ways to reduce environmental impacts from our operations.
- Contribute to CACTUS's efforts to reduce its environmental footprint.
- Support CACTUS in complying with all applicable environmental regulations.
- Develop and demonstrate behaviors that support environmental protection and conservation.
- Stay updated with the Environmental Policy, CACTUS's environmental initiatives, and our environmental performance.
- Participate in office/region-specific environmental initiatives and training programs.
- Adhere to specific procedures and instructions developed for environmental management at CACTUS.
- Share innovative solutions to reduce CACTUS's environmental footprint.
- Communicate CACTUS's environmental goals and achievements to relevant stakeholders.

Don'ts:

- Don't leave lighting and cooling systems on when not in use.
- Avoid using single-use plastics at CACTUS offices.
- Don't waste food.
- Don't engage in behaviors that negatively impact the environment (e.g., leaving taps running or electrical devices on when not needed).
- Don't act in a way that leads to environmental non-compliance for CACTUS.
- Don't violate this policy under any circumstances.

Record-Keeping and Internal Control Requirements

Accurate and complete record-keeping is crucial for CACTUS' effective operation and for fulfilling our legal and other obligations. Information about our environmental footprint (both positive and negative) must be collected, collated, and checked for accuracy consistently across all CACTUS office locations. All business units and entities must maintain effective systems for internal control and monitoring of environment-related information (such as water consumption, waste generation, energy consumption, carbon footprint, etc.). All records should be

prepared and maintained with accuracy and completeness.

Communication and Training

We are committed to ensuring this Policy is available and understood throughout our organization. To meet this objective, we will

- a. Disseminate this Policy to new Associates during induction.
- b. Share this Policy with all existing Associates via the Company Intranet

Appropriate and periodical training on this Policy will be provided to Associates to educate them about the principles and requirements of this Policy.

Raising a Concern or Complaint

Ensuring compliance with our environmental policy and contributing to our organizational goals for environmental protection is everyone's responsibility at CACTUS. You are required to avoid any activity that might lead to or suggest a breach of this Policy. If you identify a violation, please report it to Grievance Committee at grievance@cactusglobal.com. Your timely reporting helps us address concerns effectively and uphold our commitment to environmental protection.

Zero Retaliation

CACTUS is committed to protecting stakeholders who report concerns or complaints under this Policy from retaliation. We aim to shield individuals from victimization and other retaliatory behaviors so they feel safe and confident in raising issues. To uphold this commitment, CACTUS will:

- a. Protect reporting individuals from victimization and provide adequate safeguards.
- b. Maintain the confidentiality of the reporting individuals in all instances.
- c. Take suitable action against any person violating this Policy.

Monitoring and Review

CACTUS will establish appropriate measures to ensure compliance with the relevant policies, procedures, and controls. CACTUS will monitor the effectiveness and review the implementation of this Policy regularly, considering its suitability, adequacy, and relevance. Any improvements identified will be made as soon as possible. CACTUS reserves the right to amend, suspend or terminate this Policy at any time, at its sole

Disciplinary Action

Non-compliance with this Policy may result in penalties, which will vary based on the nature of the offense. Associates acting in contravention of the Policy may face disciplinary action up to and including dismissal. Additionally, any breaches of this Policy will be subject to the disciplinary procedure outlined in the Disciplinary Policy.

