

Sustainable Procurement Policy

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1. Definitions

“**Associates**” shall mean all directors, officers, managers, employees (whether full-time, temporary, or part-time), trainees, interns, etc. of CACTUS, wherever located.

“**Suppliers**” shall mean any individual or organization, who/ which provides goods, services or materials to CACTUS, including but not limited to all current and potential consultants, vendors, distributors, sub-contractors, business contacts, intermediaries, advisors, agents, freelancers, contractors, and any other parties involved in the supply chain who contribute to the delivery of products or services to CACTUS, including their employees, freelancers, and contractors.

“**Sustainable Procurement**” is defined as “a process whereby organizations meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organization, but also to society and the economy, whilst minimizing damage to the environment.”

2. Who Does This Policy Apply To?

This Policy is applicable to all the procurement activities, including goods, services, and works, conducted by Cactus Communications Private Limited, including all its global affiliates and group companies (“CACTUS” / “Company” / “we” / “our” / “us”).

3. Purpose

This Sustainable Procurement Policy (“Policy”) emphasizes CACTUS’ integral values such as integrity, trust, transparency and our firm commitment to our customers, Suppliers and communities. We consider our Suppliers as strategic partners, who are integral to our business.

The purpose of this Sustainable Procurement Policy is to establish guidelines and standards for our supply chain operations that promote environmental, social, and economic sustainability. We recognize that our Suppliers belong

to different categories in terms of their scale, the product/service they supply, the materials being used by them, their organisation structure and geographies of operation. Considering these factors, the Policy has been designed in a manner that it works for the entire supplier base.

4. Our Expectations from the Suppliers

CACTUS selects and continues business relationship with Suppliers by considering factors such as the perfect match of product and service offerings, pricing, ESG considerations, deadlines, and the outcomes of periodic evaluations of the Suppliers' performance. In assessing business proposals from potential Suppliers and continue business relationship with existing Suppliers, we focus on the following factors, which entails our key expectations.

The key expectations include:

- **Superior quality at optimum price:** CACTUS maintains top-notch performance levels in meeting our customer's needs. We demand this level of dedication from all of our partners.
- **Service:** CACTUS seeks Suppliers who highly value customer service excellence
- **Innovation:** CACTUS prefers Suppliers who have a continuous vigor for product and process improvement mindset.
- **Ethics in doing business:** It is our expectation that every Supplier consistently follows our Supplier conduct guidelines, in both form and essence.
- **ESG emphasis and adherence:** We expect that our Suppliers incorporate ESG considerations into their business and operations activities, thereby supporting CACTUS' ESG Vision and objectives. Some of the key expectations include:
 - The Supplier shall comply with all applicable regulatory requirements and take measures to go beyond compliance requirements by implementing good industry practices.
 - The Supplier shall strengthen their focus on managing environmental pollution and enhancing resource conservation by adopting relevant standards and practices at their operation.

- The Supplier shall respect human rights, and no employee of the supplier shall suffer harassment, physical or mental punishment, or other form of abuse.
- Wages and working hours will, as a minimum, comply with all applicable wage and hour laws, and rules and regulations, including minimum wage and maximum hours in the country concerned.
- Suppliers shall subscribe to highest standard of ethics and integrity, transparency in their business operation.
- There shall be no use of forced or compulsory labor and employees shall be free to leave employment after reasonable notice.
- There shall be no use of child labor, and specifically there will be compliance with relevant International Labor Organization (ILO) standards.
- The working conditions of the employees of the Suppliers will be safe and healthy and shall for Zero harm.
- The Supplier shall educate its workforce on environmental protection, human rights, health & safety at a regular basis.
- The Supplier shall develop ESG goals and targets, conduct internal ESG assessments to continually improve their ESG performance.
- The Supplier shall comply with the expectations set in this policy and our Supplier's Code of Conduct.
- The Supplier shall disclose ESG related data to CACTUS and accommodate CACTUS's request for ESG assessments as and when requested.

5. Communication and Training

It is our commitment to ensure that this Policy is available and understood throughout our organization through proper communication and there are adequate procedures available to manage procurement practices in sustainable manner. To meet this objective, the following will be executed.

- a. Dissemination of this Policy for new Associates shall be carried out at the time of induction.
- b. This Policy will be shared with all existing Associates and Suppliers.

- c. This Policy will be communicated to all Suppliers, wherever possible, at the outset of CACTUS' business relationship with them or as appropriate thereafter.

6. Raising a Concern or Complaint

Complying with the Policy commitment and contributing towards meeting the organizational goals and objectives towards sustainable procurement practices is the responsibility of all those working for or with CACTUS. You are required to avoid any activity that might lead to or suggest a breach of this Policy.

Any person who has reason to believe that a violation of this Code of Conduct has occurred, or may occur, must promptly report this information to the Supplier Risk Assessment Committee (SRAC) by writing to suppliergrievance@cactusglobal.com.

7. Zero Retaliation

CACTUS is committed towards no retaliation provisions towards persons who file reports or complaints under this Policy. CACTUS aims to prevent victimization and other retaliatory behavior towards the person raising the complaint, so they aren't afraid to speak up about any issues. To ensure that this Policy is adhered to and to assure that the concerns or grievances will be acted upon seriously, CACTUS shall ensure that:

- a. the person reporting under this Policy is not victimized and adequate safeguards against such victimization are provided.
- b. complete confidentiality of the person reporting the concern is maintained.
- c. suitable action is taken against any person violating this Policy.

8. 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 discretion,

9. Disciplinary Action

Non-compliance with this Policy by any Supplier may result in suspension of payment and termination of all contracts and association with them. An Associate acting in contravention of the Code of Conduct will also face disciplinary action up to and including summary dismissal and criminal or civil penalties which will vary according to the offence.

