

<b>Document Name</b> Environmental Policy	<b>Classification</b> Public	<b>Page:</b> 1(9)
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# Environmental Policy

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1.0	2018-03-26	Unknown	CEO	First approved version.
2.0	2024-02-16	Frida Saberian	EGMT through Sustainability Board	Document restructured and updated to include more relevant areas

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## 1. Purpose

Environment, climate and sustainable development are important focus areas for Ework Group. We work continuously to reduce the negative environmental impact of our own operations. Through work in both core activities and with Clients, Partners & Professionals and Suppliers, we strive to ensure that Ework Group contributes to Agenda 2030 and the global sustainability goals.

The purpose of the Environmental Policy is to establish and communicate the principles for Ework Group's environmental work and impact. The Policy will also give guidance to all employees towards a more environmentally sustainable way of working. We believe that digital solutions can greatly enhance sustainable development in our society. Environmental sustainability is also beneficial to our stakeholders, and it is necessary for the development of future societies.

This Policy is connected to the Code of Conduct and to the Supplier Code of Conduct. This Policy aims to ensure that we comply with relevant laws, regulations and industry standards.

The Environmental Policy outlines the principles implemented in Ework Group's Environmental Management System (EMS) which is ISO 14001 certified. This Policy is also Ework Group's communication on commitment to United Nations Global Compact, Sustainable Development Goals and Science Based Targets. The Policy comes with a subset of documents to help facilitate the management of environmental work throughout the organization.

## 2. Scope

This Policy applies to all Ework Group's companies and employees in all geographies of operation. Each Market Unit, function and Service Line are responsible for implementing processes and actions based on this Policy. This adheres to all employees. Ework Group will strive to promote this Policy with all parties contributing to Ework Group's services and other business activities. Ework Group's suppliers and subcontractors are expected to follow the principles set out in Ework Group's Supplier Code of Conduct.

## 3. Policy statement

Ework Group's top management declares that the environmental work and actions at Ework Group shall be based upon the globally accepted environmental management system, ISO 14001:2015.

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Ework Group has an Environmental Management system (EMS) implemented and is ISO 14001:2015 certified.

Ework Group aims to take a proactive and responsible approach in minimizing environmental footprint in the whole life cycle of its business operations. We are committed to the protection of the environment and prevention of pollution. We follow the environmental legal requirements and other compliance obligations in each country of operation. We also respect the principles of sustainable development by considering the needs and opportunities of future generations. Thus, we aim to use natural resources wisely and responsibly, proactively minimize our environmental footprint and apply the principles of continual improvement of the environmental management system to enhance our environmental performance.

## 4. Goals and objectives

The main objectives of this Policy are:

- Provide understandable guidance to all employees towards environmentally sustainable way of working.
- Set fundamental principles in environmental protection.
- Support Environmental Action Plan and Science Based Target commitment.

The Goals of Ework Group's EMS are listed in a separate document, Overall Environmental Goals, that is reviewed continuously and revised when needed.

Below objectives are related to our Environmental Goals and Environmental Aspects register.

Ework Group's direct environmental impact is mainly related to our office premises, hardware usage, data storage and business travel. We are working towards a zero environmental footprint in our operations. For us, an environmentally sustainable and responsible way of conducting business operations means:

- Measuring and setting targets for reducing our environmental footprint
- Reaching our Science Based Targets: Reduce scope 1 and scope 2 greenhouse gas emissions by 42% by 2030 from base year 2022
- Reducing our direct and indirect energy consumption and greenhouse gas emissions in offices by
  - Using energy efficient equipment and implementing energy saving actions
  - Switching to green certified buildings when upgrading facilities where possible
  - Switching to energy from renewable, clean sources where possible
- Using natural resources and materials wisely and in a responsible manner
  - Avoid causing waste and reduce waste where possible

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- Sorting and recycling obsolete materials and waste according to local guidelines and opportunities
- Reusing and recycling electronic waste according to best practice from environmental and human rights points of view
- Implementing circular economy principles to conserve resources
- Minimizing the use of environmentally harmful and hazardous materials
- Using energy from renewable and clean sources
  - Replacing travel, where feasible, by virtual meetings or more sustainable transport alternatives
  - Switch all company owned or leased cars to eco-friendly options when possible
- Increasing environmental competence among all employees by establishing learning resources to promote sustainable insights, solutions, and knowledge
- Co-operate with our Clients, Partners & Professionals and other stakeholders to create a more environmentally sustainable society

### **Minimizing environmental footprint in our supply chain**

Ework Group’s operations cause environmental impact in our supply chain. Our new and renewed suppliers shall comply with our Supplier Code of Conduct requirements. We also recognize the following:

- Procurement and purchasing of environmentally sustainable goods and services considering the life cycle aspect
- Responsible recycling of waste from electrical and electronic equipment and implementing the principles of circular economy
- Co-operate with our suppliers to enhance environmental sustainability

Ework Group EMS goals and objectives take into account results from risk assessments and risk treatments.

## **5. Roles & Responsibilities**

### **5.1. Roles**

#### **5.1.1 Management Team**

The CEO of Ework Group has an overall accountability for our company’s environmental work. Ework Group Management Team has committed to promote, implement, maintain, and develop an Environmental Management System (EMS). The Management Team is responsible for:

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- Informing of the importance of the environmental management system to deliver high quality services as well as being compliant with other policies, laws, and regulations
- Following-up and review environmental goals on a regular basis
- Performing regular reviews of the EMS
- Ensuring that required resources and infrastructure are allocated and provided with sufficient conditions to uphold the EMS

Aligned with company policies, values and management decisions, the Management Team has the mandate to organize and manage their respective business area(s), team(s) and initiatives to achieve wanted result/set targets.

### 5.1.2 Environmental Manager

The CEO appoints an Environmental Manager. The Environmental Manager is responsible for the documentation, implementation, and development of the EMS.

#### Responsibilities

The Environmental Manager has the following responsibilities:

- Understand the needs and requirements of all stakeholders in regards to environmental issues
- Monitor environmental goals and objectives
- Develop and implement environmental strategies and action plans, to ensure corporate sustainable development
- Lead the development and implementation of the EMS, environmental policies and practices – aligned with the ISO 14001:2015 requirements
- Ensure compliance with environmental legislation and keep up to date with national, international and European Union regulation and legislation
- Audit, analyze and report environmental performance to internal and external clients and regulatory bodies
- Regularly follow-up internal compliance to EMS, ensure that the organisation is operating according with environmental guidelines and targets, manage deviations and support in correcting actions
- Carry out impact assessments to identify, assess and reduce the organization's environmental risks and financial costs
- Promote and raise awareness, at all levels of the organization, of the impact of emerging environmental issues
- Internal and external communication for environmental related matters
- Report the effectiveness of the EMS, including environmental performance, to the Management Team
- Lead the Environmental Team

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## Mandates

Aligned with company policies, values and management decisions, the Environmental Manager has the mandate to define the company's EMS and manage efforts to ensure compliance to the EMS.

## Key Capabilities and Requirements

The Environmental Manager shall have good understanding of how Ework Group operates as well as good knowledge of management systems and environmental standards. The Environmental Manager need to understand and utilize systems to carry out problem solving, show initiative, commercial awareness and understanding of environmental issues, as well as demonstrate strong leadership and influence, having the ability to communicate effectively and drive change.

### 5.1.3 Environmental Representative

The Environmental Manager appoints an Environmental Representative for each office premises. The Environmental Representatives together make up the Environmental Team. An Environmental Representative is responsible for operating and maintaining the EMS processes and practices in their office.

## Responsibilities

An Environmental Representative has the following responsibilities:

- Support the Environmental Manager in implementing the EMS and serve as a liaison and link between the local and central
- Coordinate and pursue environmental work at local (office) level, operate and maintain the EMS processes and practices
- Regularly follow-up internal compliance to EMS, ensure that the local organisation is operating according with environmental guidelines and targets, manage deviations and support in correcting actions
- Identify client's and other stakeholder's needs and requirements, and develop relevant action plans together with the Environmental Team
- Promote and raise awareness, in the local organization, of the impact of emerging environmental issues, how to mitigate risks and take active measures to improve environmental performance
- Introduce new employees to the relevant environmental practices in the office
- Gather feedback and ideas for improvement, report to Environmental Manager
- Active contribution to environmental impact assessments, interested parties analysis, SWOT assessment and development of environmental strategies, procedures and action plans
- Participate in the Environmental Team

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## Mandates

Aligned with company policies, values and management decisions, the Environmental Representative has the mandate to manage local efforts to ensure compliance to the EMS.

## Key Capabilities and Requirements

The Environmental Representative shall have good understanding of how Ework Group operates as well as good knowledge of the EMS and relevant standards. The Environmental Representative need to have an interest in and understanding of environmental issues and preferably have experience from successfully driving improvement initiatives.

### 5.1.4 Internal Auditor

The Internal Auditor is responsible to audit that our operational business is compliant to our Environmental Management System, ISO 14001:2015 standard as well as other relevant requirements.

## Responsibilities

The Internal Auditor has the following responsibilities:

- Assist in development of audit plans and schedules
- Lead and perform internal environmental audits, assess business operations to evaluate compliance with ISO 14001:2015 standards and EMS requirements
- Identify and report non-conformity deviations and suggest improvements
- Develop and provide audit reports to be presented to management and relevant stakeholders
- Assist with follow-up audits, as required

## Mandates

The internal auditor has the mandate to report findings directly to the Management Team.

## Key Capabilities and Requirements

The internal auditor shall be independent and shall have competences including relevant standards as well as knowledge of Ework Group's EMS and its implementation.

## 5.2 Interested parties and relevant factors

Ework Group's environmental work is influenced by internal and external factors, with a multitude of interested parties.

- **External factors:**

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Laws and Regulations, Client and Customer requirements, business needs, new standards;

- **Internal factors:**

- From Management Review:

approved improvement plans, accepted risk registers, environmental goals for new period;

- From Management:

compliance requirements and targets, group strategic goals, business unit strategic goals;

- **Interested Parties:**

Board of Directors, Ework Group Management Team (EGMT), Ework Group Leadership Team (EGLT), Group functions, Business Units, Service lines, Shared Delivery, Clients & Customers, Suppliers, regulatory bodies.

## 5.3 Environmental Responsibility

All employees at Ework Group have responsibility to maintain and follow the company's values, policies and procedures. It is also expected by all employees to take active responsibility for the continuous improvement by suggesting improvements and reporting deviations that contribute to reduce the company's negative impact on environment.

## 5.4 Training

To ensure all employees at Ework Group are informed and provided with knowledge how to live up to the applicable Policies and Procedures, the following activities are performed:

- Introduction to our management systems, policies and processes is performed as part of the employee onboarding process and shall be revisited at least once every other year
- Employee performance is managed as part of the Etalk program
- Specific training sessions are conducted continuously during the year aimed to address identified needs

## 5.5 Organization as a whole

- **Legal Unit**



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is responsible for providing professional advice on legal matters, and prepare and maintain an updated list of relevant legal acts.

- **Ework Group management**

is responsible for proper application of the EMS, and are to ensure that processes and procedures compliant with the EMS standards and requirements are documented and duly followed within their own organization.

- **All employees**

are to comply with Ework Group Environmental Policy, related documentation and the Code of Conduct.

are to comply with the laws, rules, regulations, and guidelines that are applicable to Ework Group.

Ework Group will always comply with applicable legal requirements in the environmental field and constantly improve our work.

## 6 Evaluation and follow-up

In order to track, assess and report on the effectiveness of the EMS, Ework Group shall implement Environmental Goals and related Action Plan for securing environmental responsibility within organization's processes and they should be a natural part of everyday business and be included in the dialogue with our employees, suppliers, clients and partners.

Also, the EMS should go through regular audits which results shall be presented to the EGMT or the board annually or on the need-to-know basis.

They shall serve to identify potential deviations and the ongoing environmental improvements and organization's commitment to environment as well as regulatory and Client requirements.