SANMARK SOLUTIONS PRIVATE LIMITED

Environmental, Social & Governance(ESG) Policy
SS-SD-P0-004-V1.0

Table of Content

1. Purpose **3**
2. Scope **3**
3. Environmental **3**
4. Social **4**
5. Ethical Business & Governance **5**
6. Responsible Suppliers & Business Partners **6**
7. Responsibilities & Accountability **6**
8. Objectives, Measurement & Continuous Improvement **7**
9. Policy Review **7**

Environmental, Social & Governance (ESG) Policy

1. Purpose

Guided by Trust, Transparency, Care and Innovation, Sanmark Solutions is committed to responsible environmental, social and governance practices. This policy sets out how we manage resources, support our people, conduct business ethically and deliver technology responsibly. It brings our existing practices into a coordinated framework and supports practical, measurable improvement through our ESG Action Plan

2. Scope

This policy applies to all Sanmark Solutions employees, contractors, and business operations. It works alongside our existing company policies, management systems, and applicable legal and contractual requirements.

We intend to work with service providers, business partners, and suppliers whose practices are consistent with our own responsible business principles.

3. Environmental

We seek to reduce avoidable environmental impacts associated with our electricity use, digital infrastructure, equipment and everyday working practices.

As a company, we are committed to understanding and managing our environmental impact, and to reporting on it to the best of our ability, using the data available to us.

- **Solar and energy use:** we monitor our electricity consumption, and internal reporting indicates that approximately 80% of our electricity needs are currently met through solar energy, with an objective to reach full solar power. We intend to confirm the basis for this figure (metered data versus estimate, and the period it covers), publish it once verified, and set a measurable target and timeline for reaching full solar power.

- **Equipment and e-waste:** we seek to extend equipment life through maintenance, repair, reuse and redeployment where practical. We have selected an authorized recycler/disposal partner and are formalizing written arrangements for responsible handling and supporting evidence. Data-bearing equipment will be securely sanitized or destroyed in accordance with approved procedures before reuse, transfer or disposal.

- **Digital infrastructure and responsible technology:** Responsible digital practices: we consider software efficiency and resource-conscious use of digital infrastructure where practical, while maintaining security, quality and client requirements.

- **Workplace environment:** We maintain indoor plants throughout our work areas to create a greener, more welcoming office environment, with employees actively involved in caring for them. We also promote digital documents over printed materials to reduce paper use and encourage resource-conscious working practices.

- **Environmental awareness:** We introduce new employees to responsible environmental practices during onboarding, including the use of digital documents, efficient use of electricity and water, care for company equipment, and approved procedures for handling electronic waste. Employees are encouraged to apply these practices in their daily work and suggest ways to reduce waste and improve resource efficiency.

This ESG Policy provides the framework for our environmental commitments, coordinated by the ESG Coordinator and supported by relevant team members.

4. Social

Our people are central to the value we deliver. Clients engaging Sanmark Solutions for AI automation, ERP and software development rely on the skill, judgement and continuity of our team, not on physical infrastructure. Learning and development is one of our clearest strengths as a company, and an area we are committed to sustaining as we grow.

As a company, we are committed to fair employment, structured investment in our people's growth, and genuine care for employee wellbeing.

- **Fair employment and working conditions:** we maintain fair employment policies, equal-opportunity recruitment, and structured onboarding for every hire.

- **Learning and development:** we support continuous learning through training and initiatives such as Bug Factory, our internal knowledge-sharing sessions where any employee can share their knowledge and experience with colleagues. Feedback is collected after every session to guide improvements, with evaluations conducted where required to measure learning outcomes.

- **Employee wellbeing and feedback:** we promote employee wellbeing and collect employee feedback on the company and workplace experience to identify opportunities for improvement. Expectations for respectful behaviour and the prevention of harassment are set out in our HRM

Policy and Code of Conduct, and concerns can be raised through the channels described in these policies.

- **Community:** we support community initiatives as part of how we operate today.

5. Ethical Business & Governance

Governance provides the structure through which the commitments in this policy are implemented and verified. For a company handling client data, AI systems and ERP implementations across borders, governance evidence is typically central to client procurement and compliance review. Sanmark's governance foundation is strong: our data privacy practice, cybersecurity awareness, and overall governance structure are subject to continuous review, underpinned by ISO 9001:2015 certification and ISO 27001-aligned information security practice, and recognised externally through a WIPO Global Award for Innovation Excellence and National Business Excellence Award recognition.

As a company, we are committed to maintaining consistent governance standards across all areas of the business. Our ISO 9001:2015-certified quality management system and ISO/IEC 27001:2022-certified information security management system support documented controls, accountability and continual improvement. This policy builds on those foundations to strengthen ESG accountability, ethical business conduct and supporting documentation.

- **Code of Conduct:** We have finalized our Code of Conduct, which sets clear standards for ethical business conduct, respectful workplace behaviour, responsible technology use and environmental care. Human Resources coordinates its implementation and review through existing company processes.

- **Anti-bribery and corruption:** we prohibit bribery, corruption and improper benefits intended to influence business decisions. These requirements, including expectations for gifts, hospitality and conflicts of interest, are addressed in our Code of Conduct and HRM Policy.

- **Whistleblowing and grievances:** concerns about suspected misconduct or breaches of company policies can be reported through the hrm@thesanmark.com email. All the reports are handled fairly and confidentially as reasonably possible, with protection against unfair treatment for anyone raising a concern honestly and in good faith.

- **Data protection and cybersecurity:** we protect personal data, confidential information and intellectual property through our ISO/IEC 27001:2022-certified information security management system. Our practices are guided by the Personal Data Protection Act, No. 9 of 2022, as amended, the Computer Crime Act, No. 24 of 2007, and other applicable legal and

regulatory requirements. Employees are introduced to these responsibilities during onboarding, supported by regular security-awareness training.

- **Responsible technology and AI:** we address responsible AI use through our Acceptable Use Policy, which sets expectations for the appropriate, secure, and ethical use of AI tools and technologies. As AI automation is one of our core service lines, we are developing a dedicated AI policy to further strengthen governance, transparency and accountability in how AI is used and delivered.

Our governance structure is subject to continuous review, and our supplier due diligence considers ethics and data risks.

6. Responsible Suppliers & Business Partners

We recognise that our ESG impacts can extend beyond our direct operations.

Proportionate to our size and risk exposure, we consider ESG factors when selecting and managing suppliers and business partners, including ethical business conduct, labour and human-rights practices, environmental responsibility, data protection and cybersecurity, and compliance with applicable laws. Our existing supplier due diligence already considers ethics and data risks, and we intend to extend this formally to ESG criteria specifically.

7. Responsibilities & Accountability

ESG-related matters are coordinated by a dedicated ESG team, supported by an appointed ESG Coordinator. The team is responsible for overseeing Sanmark's ESG initiatives, monitoring progress and supporting the integration of environmental, social and governance considerations across the business.

The ESG team is governed by company management and operates within Sanmark's management systems, with the ESG Coordinator coordinating activities and reporting progress to management. Management is responsible for integrating relevant ESG considerations into business decisions, providing appropriate resources, and reviewing progress against ESG objectives.

Employees are responsible for understanding and complying with this policy, raising concerns where they identify potential violations, and supporting the company's ESG objectives. Where appropriate, ESG responsibilities may be incorporated into individual roles and performance objectives.

8. Objectives, Measurement & Continuous Improvement

We recognise that meaningful ESG management requires more than commitments. We will progressively establish indicators and objectives appropriate to our size, sector and material ESG impacts, and review progress through our ESG team and management systems.

- **Environmental examples:** verified solar energy generation, responsible e-waste disposal through confirmed recycling partners, and adoption of green-coding guidelines.
- **Social examples:** employee wellbeing survey results, training hours per employee, and completion of anti-harassment procedures.
- **Governance examples:** Code of Conduct implementation and awareness, use of the HR whistleblowing email for raising concerns, ISO/IEC 27001:2022 information security performance, and adoption of responsible-AI guidance.

We will communicate our ESG commitments, actions and progress through our website, and other appropriate channels, supported by the best available evidence.

9. Policy Review

This policy will be reviewed at least annually, alongside our existing ISO 9001 and ISO/IEC 27001 management reviews. It will also be reviewed when significant changes occur in our business, regulatory environment, or ESG priorities.