SICE ANZ Corporate Social Responsibility Policy

Policy Summary

SICE ANZ understands Corporate Social Responsibility (hereinafter "CSR") as the responsibility that corresponds to our organisation for the impact of our activity on our stakeholders, including society. To fulfil this responsibility, SICE ANZ integrates social responsibility principles, including social, environmental, ethical, and human rights concerns in our business dealings.

Through its CSR policy, the SICE ANZ must contribute to the following objectives:

- Carry out our business dealings responsibly, placing our people at the centre of our purpose.
- Maximise the creation of sustainable and shared value for our shareholders, other stakeholders and the entire society in which we operate.
- Prevent and mitigate the possible negative impacts derived from our activities.
- Improve the reputation of SICE ANZ as a responsible agent.

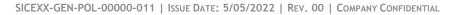
Policy Introduction

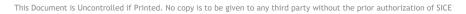
This Corporate Social Responsibility (CSR) policy aims to create a reference framework that contributes to defining and promoting behaviours that allow generating value for all our stakeholders (customers, employees, shareholders, suppliers, and society) and promotes a culture of social responsibility that translates into the activities all team members. This is in a framework of continual improvement.

This CSR policy is aligned with our Code of Conduct, which establishes behavioural guidelines in accordance with SICE ANZ values: transparency, integrity, respect for ethical behaviour, observance of the principle of legality, observance of the international norms of behaviour and respect for human rights, engagement, and observance of our stakeholders' interests, etc.

This policy will also be developed and complement the different policies that are approved within SICE ANZ in direct relation to the general and specific principles of action here established.

Rev.	Date	Prepared	Reviewed	Approved	Remarks
00	05/05/2022	Beatriz Dafne Jerez del Castillo Corporate Compliance and Social Impact Delegate	Ana Saez Marketing Officer	Manuel González Arrojo SICE ANZ Managing Director	First issue





BASED ON TEMPLATE: SICE-GEN-TMP-00000-030 | Rev. 00 | ISSUE DATE: 23/06/2021





Key definitions

- Corporate Social Responsibility: Refers to SICE ANZ's commitment to recognise and manage its impact
 on its stakeholders and society, and to ensure that its own business activities and, where practicable,
 those of its supplier organisations, are being undertaken in a socially and environmentally responsible
 manner. By understanding and addressing the impact of its operations, SICE ANZ can also more
 effectively manage a broader range of risks and opportunities.
- **Sustainability:** Sustainability recognises the interdependence of economic, social and environmental objectives in ensuring the long-term viability of our organisation.
- Ethics: The written and unwritten codes of principles and values that govern decisions and actions within the organisation. From a CSR perspective, ethics are based on the belief that SICE ANZ should consider, in its decision-making, the potential impact of those decisions and actions on multiple stakeholder groups.
- Stakeholders: Individuals and groups who affect or who may be affected by SICE ANZ actions and decisions in Australia, New Zealand and other countries. Stakeholders can include employees, clients, suppliers, contractors, local communities, business partners, media, and governmental organisations, amongst others.



1. PURPOSE AND SCOPE

1.1. Purpose

- 1.1.1.1. The purpose of this policy is to maximise SICE's positive impact in the long term by understanding that we have the responsibility to identify and manage our stakeholders' needs and expectations, maximising their wellbeing, and in turn, the sustainability of our business.
- 1.1.1.2 This policy highlights the key corporate social responsibility principles and practices to which SICE ANZ aspires so that our organisation can achieve the highest standards of responsible business practice and sustainability and produce a positive outcome in our community by applying our skills and expertise.
- 1.1.1.3 This policy will support SICE ANZ in achieving its corporate interest and its strategic goals by:
- Managing the company based on the SICE ANZ values of integrity, professionalism and respect, which must be present in any business project that is carried out.
- 1.1.1.32 Promoting compliance and respect for the national and international legislation, in line with the principles outlined in our Code of Conduct.
- Promoting socially responsible behaviour in the company to continue to be a lever for change in our society.
- Establishing relationships of stability and equality with stakeholders related to the company by open dialogue processes with interested groups, conflict resolution, and project improvement.
- Managing the risks, business opportunities, impact and value creation for SICE ANZ stakeholders balancing its needs and expectations through our integrated management of ethical, economic, social, labour, and environmental issues with a view to the long term.

1.2. Scope

- 121.1. This policy applies to all SICE ANZ employees and contractors in Australia and New Zealand and all the key parties with which the organisation conducts business dealings nationally and internationally.
- 1212 It also extends to all products and services offered by SICE ANZ and all business activities of the organisation, including both project and functional areas.



2. CORPORATE GOVERNANCE: OUR SOCIAL IMPACT MANAGEMENT FRAMEWORK

- 21.1.1. SICE Pty Ltd and SICE NZ Ltd (SICE ANZ) are subsidiaries of SICE S.A., in turn, part of a larger group, composed of half a dozen of company members, called SICE TyS Group. SICE TyS Group operates with a decentralised structure around the world.
- 21.12 SICE ANZ has developed an independent CSR Management System that is aligned with our group's standards and values. Therefore, our efforts add up to the contributions of other group companies that implement their actions autonomously and manage their resources in the most efficient way possible.
- 21.1.1. SICE ANZ will employ a systematic approach to CSR and sustainability management to strive for continuous performance improvement, and thereby deliver wider benefits to the community, other stakeholders, and the environment.
- 21.12 SICE ANZ CSR Policy and its underlying principles will need to be effectively communicated, implemented, managed, and regularly reviewed and assessed. To achieve these objectives, SICE ANZ will develop a management model based on the following:
- 21.1.3. 1. The ethical management of our daily activities based on our corporate values, our Code of Conduct and the SICE ANZ Compliance Management System.
- 21.14. 2. An inclusive and holistic stakeholders' management model, based on:
- The identification of key internal and external stakeholders that are impacted by the SICE ANZ activities and projects.
- 21.1.42 The establishment of stable relationship mechanisms and effective channels for communication.
- The prioritisation of matters that are relevant to them and contribute to the greater creation of value for the organisation, including any material topics identified by the company as key for its strategy and its stakeholders.
- 21.1.5. 3. The identification and management of material risks and opportunities of an economic, labour, ethical, environmental, or social nature, to achieve sustainable performance with a long-term vision and perspective.
- 21.1.6. 4. Setting and reviewing objectives and targets for CSR and sustainability practices and integrating these into operating practices.
- 21.1.7. 5. The development and adherence to systems and practices that assist SCIE ANZ to meet clear standards of corporate governance in all our operations.
- 21.1.8. 6. Guaranteeing that our employees and relevant business partners are aware of and understand the principles of this policy, by providing training and ensuring appropriate communication.
- 21.1.9. 7. The implementation of systems for managing, measuring, monitoring, and reporting progress on material risks and opportunities.
- 21.1.10. 8. Continually assessing the performance of our CSR and sustainability systems and processes.
 - 9. Developing and deploying a SICE ANZ management model based on continuous improvement and excellence.

2.2. Roles and Responsibilities

221.1. SICE ANZ Senior Management is responsible for the approval of SICE's Corporate Social Responsibility Policy (*This policy*). Senior Management will also ensure the effective implementation of the policy through the Heads of Functions and Project Managers based on the scope of competence of each one of them. All of them are



responsible for shaping organisational culture and environment, which is based on standards that are conducive to achieving the objectives of this policy.

- In the area of developing and managing CSR practices, of important relevance is the Social Impact Delegate, who oversees the implementation of the SICE ANZ Corporate Social Responsibility Program. The Social Impact Delegate also develops the systems for monitoring the performance of the CSR System and coordinates and supports the different management areas that implement the activities under the CSR Program; these being the true protagonists and responsible for making this policy a reality.
- 2213. Once business plans to be undertaken are specified at the corporate level, each specific department/area/project is responsible for executing any relevant actions under their area of responsibility in a manner consistent with the guidelines given.
- Finally, all employees are responsible for their actions (individually and collectively), embracing this policy and reporting any suspected breaches of this policy. They can do so by using the following channel: anzsicecsr@sice.com.au.

2.3. The CSR Committee

- 23.1.1. The CSR Committee is an important forum for SICE ANZ to share and discuss ideas and suggestions concerning CSR matters. The CSR Committee inputs are also key to shape SICE ANZ Corporate Social Responsibility strategy, and design/evaluate/implement initiatives to maximise the wellbeing of SICE employees and other stakeholders.
- 2312 The members of the CSR Committee shall be appointed by the different projects and functions.
- 23.1.3 The role of the CSR Committee will include:
- a) Review and make recommendations regarding proposals related to matters of corporate social responsibility (employee wellbeing and community involvement; environmental management; corporate social responsibility of suppliers; human rights, suppliers, clients and communities, etc.)
- b) Identify and present social, political, economic, and environmental trends that may have a significant impact on the company's business activities and performance.
- 23.1.33 c) Recommend, review, and evaluate goals, initiatives, and practices for Corporate Social Responsibility.
- D) Provide feedback on operations of the SICE ANZ CSR Programme or any of its initiatives, helping to monitor its effectiveness.
- 23.1.3.5 E) Volunteer to support or lead the implementation of specific CSR initiatives or activities.
- 2314. The CSR committee will hold regular meetings throughout the year.



3. BUSINESS PRINCIPLES

- 31.1.1. In the following sections, we will discuss SICE ANZ Corporate Social Responsibility principles of action. Those principles will be applied in our business dealings to strengthen the company's core business and its relationship with its stakeholders.
- 3.1.1.2 The principles of action to which SICE ANZ and its associated projects are committed are:

3.2. Trust: Accountability and Transparency

- 321.1. SICE ANZ commits to complete rigour in the information it transmits, ensuring transparency in our own practices, and always respecting the interests of our clients and the rest of our business partners.
- 3212 This general objective of transparency is articulated through the following action guidelines:
- Disseminate relevant and truthful information regarding our performance and activities, complying with any legal requirements that may exist regarding public information.
- Maintain a fluid relationship with the different stakeholders of the organisation.
- 3213. SICE ANZ manages its commitment to transparency towards its stakeholders through the operating company itself and its teams and functions, as well as the SICE website.

3.3. Integrity: Ethics and Respect for the Law

- 33.1.1. Integrity is the manifestation of ethics in our actions and relationships with stakeholders. Ethical behaviour is key to our business dealings and the establishment of contracts.
- Our actions are based on compliance with the national and international laws and regulations in force in the countries where we operate, as well as on compliance with any international commitments or standards we voluntarily have signed or adopted.
- 33.1.3 Our integrity principle is articulated through the following action guidelines:
- SICE ANZ has developed clear standards of corporate governance, based on respect for the rule of law and clear guidelines to guarantee ethical behaviour in our business dealings.
- SICE ANZ is committed to promoting, reinforcing, and controlling issues related to ethics and integrity, through measures to prevent, detect and stop bad practices.
- SICE ANZ encourages knowledge of our general principles of conduct, ethics and integrity by all employees, as well as relevant clients, suppliers, and subcontractors.
- SICE ANZ respects the rules of the free market and free competition and rejects any illegal or fraudulent practice contrary to the rules of good governance.
- SICE ANZ upholds a zero-tolerance policy against bribery and corruption.
- SICE ANZ has deployed internal mechanisms for preventing, monitoring, reporting, and penalising
 unethical and illegal behaviour that occurs within the organisation, including an ethical channel for
 reporting incidents or doubts.



In support of this principle, the organisation has implemented a Corporate Compliance Management System and has achieved explicit certification for ISO9001:2015 (Quality), ISO14001:2015 (Environmental), ISO45001:2018 (OH&S), and 37001:2016 (Anti-bribery).

3.4. Quality: Excellence and Continual Improvement

- 3411. Quality is a priority for SICE ANZ and a differential factor of our offer.
- 34.12 Under the area of excellence and continual improvement, SICE ANZ will apply the following principles:
- The periodical establishment of quality objectives and the evaluation of their fulfilment.
- The development of initiatives and actions aimed at continually improving the quality of the services provided.
- Regular communication and consultation with our clients, suppliers, subcontractors and other business partners to better understand their requirements and enhance the quality of our processes and services.
- Equipping SICE ANZ employees with the required skills to do their jobs, investing in training and development, and promoting a safe working environment that supports health and wellbeing.
- 34.1.3. In support of the previous principles, the organisation has implemented its own Quality Policy and Quality Management System (in accordance with AS/NZS ISO 9001:2016).

3.5. Innovation: Technological Progress

- 35.1.1. Through its commitment to technological development, SICE ANZ responds to the growing demand for improvements in processes, technological advances, and quality of service from customers and society.
- 35.12 SICE ANZ aims to continue seizing opportunities to do things better, provide quality, and deliver results-driven solutions to our clients.

3.6. Engagement: Communication and Dialogue with Stakeholders

- 36.1.1. Our solutions serve the public and the common good. We, therefore, strive to understand, involve, and work with our stakeholders in our projects as early as possible.
- Relations with our key stakeholders must always be framed within an environment of open dialogue and effective communication, whether through direct contact, email, Microsoft Teams and other Microsoft Tools, SICE's website, and LinkedIn, among other channels. Communication and dialogue with all stakeholders will be based on transparency, truth, and commitment.
- 3.6.1.3. In this area, we commit to:
- Building understanding about the direct and indirect impact of SICE ANZ operations, both inside and outside the organisation, and continuously striving to improve the management of those impacts.
- Engaging with and continuing to build relationships with stakeholders by providing them with a range of opportunities by which to express their interests and concerns.
- Building relationships and partnering up with stakeholders throughout the supply chain that share our desire to make a positive impact on society and the environment.



4. SICE ANZ COMMITMENTS TO ITS STAKEHOLDERS

4.1. Employees: Investing in People

- 4.1.1. SICE ANZ team members are at the centre of SICE's corporate social responsibility strategy and long-term business success. Our employees together represent our biggest stakeholder's block. Values such as teamwork and collaboration are what have helped us to achieve the objectives of the company, including offering excellence in service, know-how and professionalism.
- 4.1.2 Below we highlight some of the areas of focus on our relationships with employees:

4.1.1. Engagement and Satisfaction

- 4.1.1.1. SICE will work on providing meaningful work and a sense of purpose to our employees, giving them a voice in company decisions, respecting their individual contributions, autonomy, and sense of control, and engaging our people to succeed.
- To seek regular feedback from our employees, we have established a CSR Committee, amongst other channels, where SICE team members can voice their opinion and introduce and become involved in initiatives to help the community.

4.1.2. Career and Development: Promotion of Sustainable Careers

- 4121. We commit to continuously developing our team members' skills and knowledge, creating a stimulating, participatory work environment, and in which people can emerge and develop all their capabilities, give the best of themselves, allowing them to improve their employability.
- In this area, we will propose training opportunities for the learning and personal and professional development of our employees.

4.1.3. Promotion of Diversity, Inclusion, Gender Equality and Equal Opportunity

- 4131. Our culture is based on bringing together people of different backgrounds and experiences and capitalising on our differences.
- 4132 We commit to non-discrimination based on race, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political or union opinions, religion or any other personal, physical or social condition. Also, we fight all forms of discrimination in hiring, in workplace relations and in the career paths of our employees
- 41.33. We will continue working on improving equal opportunities for the entire workforce by promoting work-life balance and flexible hours. As a part of supporting gender equality in society, SICE ANZ will support projects and activities that are in furtherance of this objective.

4.1.4. Health, Wellness, and Safety: A Safe and Secure Workplace

- 41.4.1. We reject the idea that workplace accidents are unavoidable. Our management has a responsibility to do its utmost to ensure the physical integrity and the health of everyone on our facilities and worksite.
- We have implemented practices to guarantee the safety of the workforce and ensure the health of all employees by providing our employees with a safe and stable environment, permanently updating the occupational risk prevention measures, and respecting the applicable regulations on this matter in all places



where we carry out our business activities. SICE ANZ has implemented its own Occupational Health and Safety Management System following AS/NZS ISO45001:2018 that underpins this commitment.

41.4.3. Finally, we will encourage flexibility practices to foster balanced career and personal development for our employees, including practices to reconcile work and family life.

4.1.5. Respect and Dignity in the Workplace

- 415.1. We commit to complying with labour legislation and meeting international labour standards around acceptable working conditions for all workers.
- 41.52 We also offer financial security to SICE ANZ employees via fair salaries as well as support services, such as financial advice.

4.2. Clients: Pursuing Customer Satisfaction

- 421.1. Clients are one of the pillars of our business. To establish lasting relationships, based on mutual trust and shared value, our commitment to our clients is based on the following points:
- Providing quality products within the agreed timeframe, under the contractual conditions and following safety standards, supported by our Quality Management System.
- Guaranteeing our software solutions are resilient. This means our software engineers will anticipate unexpected events and account for them.
- Striving for the best technical and economic solution for our clients.
- Continually innovating to provide added-value services.
- Offering services that take care of the environmental impact in all phases of their lifecycle, in alignment with our client's requirements and expectations.
- Working closely with our clients, continuously monitoring their requirements and striving to anticipate their needs.
- Seeking regular feedback on the relationship with our clients, by maintaining appropriate and efficient communication channels.
- 421.18 Managing and resolving our client's claims in the shortest time possible.
- Ensuring the responsible use of our client's information, maintaining due confidentiality in processing their data.

4.3. Supply Chain: Building Strong Relationships

- 4.3.1.1. SICE ANZ has a supply chain management model that understands our suppliers and business partners are allies in our attempt to ensure socially responsible and ethical services. This involves:
- Ensuring that the value chain complies with SICE's values and principles outlined in our Business Partners Code of Conduct, including transparency in the procurement process, respect for human and labour rights in the supply chain, compliance with the national and international laws, and consideration of the environment in our purchasing decisions
- Ensuring transparency in contractual relationships and satisfaction of our legal and contractual obligations, supporting the establishment of long-term mutually beneficial relationships, based on mutual trust and the contribution of value to both parties.



- Becoming more efficient and effective throughout our value chain through "win-win" strategies with our suppliers.
- Promoting and taking advantage of technological advances offered by our suppliers to reduce negative environmental impacts, and systematically incorporating collaboration with them aimed at generating open innovation.
- Ensuring our suppliers' right to data protection and confidentiality.
- To achieve those objectives, SICE ANZ works closely with its suppliers and has developed specific standards and processes for risk management, due diligence, evaluation, approval and control systems for suppliers and subcontractors.
- In addition, all SICE ANZ employees who participate in the selection processes of contractors, suppliers, and external collaborators, have an obligation to act impartially and objectively, applying pre-determined criteria and avoiding the collision of their personal interests with those of the company.

4.4. Environment: Working Towards a Sustainable Future

- 44.1.1. SICE ANZ conducts its activity with a firm commitment to contribute to sustainability from an environmental perspective, materialised through the integration of the environmental considerations into the business processes, the promotion of environmental responsibility, preservation of biodiversity, prevention of pollution, efficient management of resources, adaptation and mitigation of climate change, and compliance with any laws and regulations, as per what is established in the SICE ANZ Environmental Policy.
- 4412 SICE shows its commitments in this area with actions such as:
- Responsible consumption and efficient management of natural resources, such as water, electricity, paper, and waste, by working with our suppliers and service providers to ensure efficiencies in all our offices.
- Being mindful of the need to travel by utilising technology in communications with our employees, potential employees and business partners. We continue to develop our technology investment and initiatives in each office to ensure resources are used efficiently and environmental impact is reduced.
- Monitoring periodically the environmental risks that exist in each phase of the SICE ANZ projects and adapting to the necessary changes.
- Integrating progressively environmental variables in product development, in alignment with or client's requirements.
- Informing and training our employees on environmental issues pertinent to the project, as per each individual's responsibility.
- Sharing with our supply chain the environmental impacts of the projects and the mitigation methods used, as well as encouraging their adoption.
- 44.1.3. In support of our Environmental Policy and the previous environmental commitments, the organisation has set environmental priorities, objectives, and improvement programs, as well as monitoring mechanisms that measure our environmental performance, in compliance with the ISO 14001 standard.



4.5. Community, Society, and Governmental Organisations: Creating Integrative Value

4.5.1.1. SICE recognises our responsibility to act as a good corporate citizen and we believe that involvement and cooperation with our community is a vital component of sustainable business practice. Some of our commitments in this area include:

4.5.1. Compliance and Respect with the Rule of Law

- 45.1.1. SICE complies with national and international laws and regulations in all countries where it operates.
- 45.12 The organisation respect fundamental human rights and the dignity of people, committing to:
- 4.5.1.2.1 avoid practices that are discriminatory or damage people's dignity.
- providing a decent, safe, and healthy working environment, adopting rules and procedures in the area of occupational health and preventing occupational risks.
- 4.5.1.2.3 Rejecting child labour and forced or compulsory labour.
- Respecting employees' freedom of union, association and group negotiation in accordance with current legislation.
- 45.1.3 This is supported by a robust Corporate Compliance Management System, with its own Code of Conduct, and corporate policies, that not only encourage compliance within the organisation but promote respect for the rule of law in the dealings with its business partners.
- 45.14 The organisation also commits to **fiscal responsibility**. The organisation meets its tax obligations under the applicable fiscal legislation, paying the corresponding taxes following the profit generated in each territory.

4.5.2. Respect for Data Privacy and Confidentiality

4521. SICE ANZ guarantees people's right to personal data privacy.

4.5.3. Respect for the Rights of Minorities, including Indigenous Rights

4531. SICE ANZ respects the rights of the communities of the locations where we operate, including the rights of monitories and indigenous populations present both in Australia and New Zealand.

4.5.4. Global Partnerships for Sustainability

45.4.1 The organisation is open to participating in initiatives and collaborating with regulators, other organisations and sectoral forums for the promotion and dissemination of know-how, responsible practices, promotion of quality, competitiveness, sustainable development, and responsible communication.

4.5.5. Promotion of Local Development and the Employability of the Local Communities

- 4.5.5.1. SICE ANZ is committed to the economic and social development of the countries where we operate.
- 4.5.5.2 For instance, the organisation ensures decent employment to any potential candidate. To provide decent employment:
- SICEA ANZ pays its employees in a decent manner, adjusted to their skills, responsibilities, and duties. This payment is aligned with applicable legislation and the conditions of the market, which allows them to meet their basic needs and those of their families.



- SICE ANZ guarantees the right of its employees to a workday that respects their right to rest and that facilitates flexi-work practices, acknowledging employees' need to balance their work-life with other interests and responsibilities.
- 4553. In addition, where possible, SICE suppliers are sourced locally.

4.5.6. Social Action and Investment

- 4561. SICE will promote its own or collectively initiatives to achieve the United Nations Sustainable Development Goals, including donations to charities and industry associations partnerships.
- 4562 SICE will also partner with not-for-profit organisations to employ minorities.
- 4563. Finally, when possible, the organisation will support the civic engagement of our employees.



5. ENGAGEMENT AND DIALOGUE CHANNELS: TELL US WHAT YOU THINK

- 51.1.1. SICE ANZ systematically identifies and listens to the needs and expectations of our stakeholders, following a structured process and making use of different communication channels that facilitate open communication, participation, and dialogue.
- 5.1.1.2 Communication channels are included in detail and up-to-date manner in our internal documentation. Among those channels, the CSR Committee is an important forum for our people, where they are encouraged to share their opinions and provide strategic advice regarding CSR strategy and practices. This body is key in the governance of the CSR Policy and initiation of programs and initiatives within SICE ANZ.
- 51.1.3. We also have created a specific channel, <u>anzsicecsr@sice.com.au</u>, that is open to any stakeholders that want to raise any concerns or suggestions in that regard.
- 51.1.4. Our organisation encourages transparency in the dissemination of information to stakeholders, always adopting responsible communication practices.