

DENIC Services

**ENVIRONMENT  
SOCIAL  
GOVERNANCE**

Policy



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## Preamble, Introduction

*This is a translation of the German version. German version is binding.*

Our company is committed to complying with environmental, social and corporate governance principles (Environmental Social Governance (ESG for short) to promote sustainable growth, assume social responsibility and ensure good corporate governance. The following ESG Policy is intended to guide our business practices and decision making to ensure that ESG factors are integrated into our corporate strategy.

### Environmental Responsibility:

- We are committed to reducing our environmental footprint by promoting environmentally friendly practices and technologies.
- We pay attention to the sustainable use of resources, including water, energy and raw materials, and strive to minimize waste and emissions.
- We comply with applicable environmental laws and regulations and are committed to protecting the environment and biodiversity.
- We promote environmental awareness and education among our employees and in our community.

### Social responsibility:

- We respect human rights in all aspects of our business operations and support respect for human rights in our supply chains.
- We promote equal opportunities, diversity and inclusion in our work environment and reject discrimination of any kind.
- We pay attention to safe and healthy working conditions for our employees and promote their well-being and development.
- We support social initiatives and help improve the communities in which we operate.

### Corporate governance principle:

- We promote transparent and responsible corporate governance and comply with applicable laws and regulations.
- We promote ethical business practices and reject corruption, bribery and unfair competition.
- We ensure that our business decisions are made on an appropriate risk assessment and management basis.
- We encourage open communication and dialogue with our stakeholders, including employees, customers, suppliers, investors and the community.

### Reporting:

- We commit to reporting annually on our ESG performance and progress.
- We use relevant ESG indicators and standards to assess our performance and provide reports to our stakeholders.
- We encourage open communication about our ESG goals, strategy and initiatives both internally and externally.

The ESG Policy below is regularly reviewed and updated to ensure it reflects evolving ESG challenges and opportunities. All employees are required to adhere to this policy

## 1. About this policy

- 1.1. Questions about the preservation of our environment, social and societal responsibility cannot be viewed in isolation from corporate management. ESG is about bringing these issues together under a common perspective to demonstrate the positive impact of our operations on the world. The introduction of an ESG policy corresponds to the social and societal responsibility of our company.
- 1.2. The policy described here will inform our future ESG efforts. This includes, among other things our reporting to all stakeholders, in particular customers and shareholders, business processes, guidelines on other topics, investments and management activities .

## 2. purpose of this policy

- 2.1. The purpose of this policy is to provide information on ESG (environmental, social and governance) factors and to encourage the company to better understand ESG factors.
- 2.2. This policy does not form part of any employment or other service contract, and we may change it at any time.

## 3. Who is responsible for this policy?

- 3.1. The Management bears overall responsibility for the effective implementation of this policy. It has delegated responsibility for overseeing their implementation to the ESG Officer role. Suggestions for changes should be reported to the person holding that role.
- 3.2. Supervisors are responsible for this policy in day-to-day business. Questions about this policy should first be directed to line managers and then, if necessary, to the ESG officer.
- 3.3. This policy is reviewed annually by the management and coordinated with the shareholders. Changes may be made at any time as relevant government guidance evolves.

## 4. Our ESG commitment

- 4.1. We strive to build our company into a member of a sustainable, just, healthy and diverse society through a combination of innovative business practices and environmental, social and governance (ESG) excellence. This commitment informs every aspect of our business, including how we design and build new projects, operate our business, collaborate with stakeholders and report on progress.
- 4.2. This ESG policy sets out our approach to sustainability. At the heart of the policy is a corporate culture that makes sustainability an essential criterion for everyone business activities and values.

## 5. Our statement on climate change and the environment

- 5.1. We are committed to reducing our energy and carbon impact as we believe climate change is one of the greatest risks facing our world. Our sustainability program focuses on environmentally sustainable initiatives that create short-term efficiency, value and health for our company, our employees and the community.
- 5.2. We encourage our customers to reduce their impact on the environment by recommending the use of more sustainable materials. We actively promote a paperless office. We regularly support our customers to avoid printing and we make every effort to continue to digitalize.
- 5.3. We strive to comply with applicable environmental regulations and work to minimize the impact of our operations on the environment.



- 5.4. We support the recommendations of the [Taskforce on Climate-related Disclosure \(TCFD\)](#) and engage with our stakeholders to increase disclosures related to climate change, biodiversity and the [SDGs](#), including efforts to advance underlying goals such as those of the Paris Agreement .

## 6. Our social responsibility statement

- 6.1. We focus on deepening relationships with our key stakeholders by investing in our people and forming partnerships with our customers, suppliers and shareholders.
- 6.2. We are committed to working with our employees to provide them with a challenging, dynamic, inclusive and diverse work environment that supports their professional development and promotes a good work-life balance that prioritizes their overall health and well-being.
- 6.3. We support initiatives that benefit the environment, human well-being and education.
- 6.4. We will engage suppliers, customers and employees in safety, health and well-being.
- 6.5. We uphold and promote the protection of human rights and the well-being of people in our own operations and in our supply chain, in accordance with our Human Rights Policy, Code of Ethics and Business Conduct, Supplier Code of Conduct and Modern Slavery and Human Trafficking Policy.

## 7. Our Corporate Ethics Statement

- 7.1. Our focus is on promoting a high level of transparency and risk management at all levels of our organization to ensure the resilience and long-term value of our business.
- 7.2. We will mitigate risks and increase our company's resilience to climate change, earthquakes and other catastrophic events through intelligent design and foresight.
- 7.3. We are committed to high ethical standards through a strong code of ethics and business conduct, ongoing ethics training and a leadership that promotes a culture of integrity.
- 7.4. We maintain close relationships with our stakeholders through transparency, open communication and responding to their suggestions.
- 7.5. We establish a clear and effective ESG governance principle, set targets and report annually.

## 8. Our business and ESG

- 8.1. By considering ESG in conducting our business, we aim to take concerted, defined and measurable actions to improve the world through positive net impact of our work. As such, ESG is a fundamental part of how our company lives our values in the real world.
- 8.2. The ethical and practical values that make up the different parts of ESG have always been at the core of what we stand for as a company. With With increased awareness of these factors among our key stakeholders, we have a better opportunity to make a positive impact on our world through our behavior and our company's alignment with ESG.
- 8.3. we strive the full range of factors - from environmental and climate protection considerations to social issues and the way we invest in our employees to the structure of our company and the constant pursuit of better corporate governance - to be viewed and evaluated holistically.

## 9. Our commitment to the rest of the world

- 9.1. As a company, we feel a commitment to our employees, our customers and the world at large. ESG gives us the opportunity to bring these influences together. We value investing in

our people, just as we value protecting our environment and being a valuable member of society.

- 9.2. The promotion of openness, sustainability and respect are our most important goals on this path. We value each person and strive to work as a team. We view ESG as an ongoing process of aligning our operations and controls with our values as a company.
- 9.3. Our commitment to improving our social and environmental performance demonstrates a strong, well-informed management mindset and a values-driven culture that is both alert and responsive to the challenges and opportunities of doing business responsibly and sustainably.

## 10. ESG and our reputation

- 10.1. ESG is fundamental to our reputation as a company. A good reputation is built through frequent and repeated interactions with stakeholders. When these interactions are positive, our business and reputation can thrive. In an uncertain economic climate, a positive reputation is one of the most important factors for long-term success.
- 10.2. We want all our stakeholders, from customers to suppliers, to our employees and shareholders, to be proud to be part of our company. Part of that pride is an understanding of how our company makes a positive contribution to the world.
- 10.3. Environment - Environmental sustainability is an ethical and economic imperative. Managing our carbon footprint goes hand in hand with the strategic need to work efficiently. Our commitment to tackling climate change at the corporate level is fundamental to our strategic goals.
- 10.4. Social - Our employees make our business what it is. Intellectual capital is central to our customers, our business model and our long-term sustainability as a company. We aim to create an environment where the unique talents and contributions of each individual are valued and encouraged within a culture of inclusion. While we still have progress to make, we are committed to facilitating and supporting change by creating an inclusive work environment where all talent can thrive.
- 10.5. Governance - Good governance is the foundation of our business and all aspects of ESG. We cannot thrive without paying attention to our compliance obligations. Our company strives to go beyond the concept of “checking boxes” and embedding compliance at the core of our business.

## 11. Our responsibility to our customers

- 11.1. We are committed to our customers to provide them with the best service. Customers are at the heart of our business and without these partnerships our company would not exist. Part of this commitment to customers is listening to their needs, listening to their concerns and working to ensure our customers' satisfaction.
- 11.2. The best customers are those who see us as a partner in their own business. In return, these clients reward us by continuing their business and building and maintaining our world-class reputation.
- 11.3. The ESG priorities result not only from the concerns of the shareholders, but also from the needs of the customers. Customers ask how we improve the world around us. How do we protect our common natural heritage, invest in our society as good members? It is imperative for us as a company that all of our interactions with customers reflect the expectations that they have of us.

- 11.4. That's why it's important that our clients understand our support of ESG and the resulting impacts, and what it means for our business.

## 12. Our employee and their role at ESG

- 12.1. As members of our company, our employees have an important responsibility for the prosperity of our organization. In relation to ESG, this means that every employee must understand their role in each area of ESG. To do this, you need to know the following:
  - 12.1.1. Our strategic ESG goals
  - 12.1.2. How do we want to achieve them and in what period of time
  - 12.1.3. The individual contribution of each individual and the teams to these goals
  - 12.1.4. How we discuss our ESG goals with clients and third parties
  - 12.1.5. Where possible concerns or actions that violate our policy can be reported.
- 12.2. On an individual level, each employee can play an important role in achieving our ESG goals (12.3-12.5).
- 12.3. Environment - Every employee can help reduce carbon emissions and achieve net zero. While we as a company set corporate-level goals, our employees should consider the impact on the environment in decisions they make. For example:
  - 12.3.1. Are there more environmentally friendly alternatives when traveling?
  - 12.3.2. Can some sessions be held remotely instead of traveling?
  - 12.3.3. Is the printout on paper necessary?
  - 12.3.4. Are there recycling and energy saving measures in the office?
- 12.4. Social - Building a diverse and inclusive workforce where everyone feels valued is everyone's responsibility. It is critical to our success as a company that our people understand their role in bringing people together. From hiring the best talent to encouraging all employees to thrive, we want a workplace where people work proactively to be the best. Each individual can contribute:
  - 12.4.1. Question and report discriminatory or abusive behavior
  - 12.4.2. Understanding diversity and inclusion policies
  - 12.4.3. Be an active ally for often underrepresented groups
  - 12.4.4. At setting a good example in day-to-day work
- 12.5. Governance- Good governance goes beyond having the right policies and procedures. It's about anchoring compliance with regulations in day-to-day work. From attending timely training to actively understanding how regulations affect your work, good corporate governance begins with individuals acting ethically. We take this to heart by:
  - 12.5.1. Commit to compliance within our teams
  - 12.5.2. Refer to policies and procedures rather than accepting "shortcuts."
  - 12.5.3. Recognize and name compliance violations and risks in your work area
  - 12.5.4. denounce bad behavior or report omissions

## 13. ESG and our value chain

- 13.1. Our company does not work in isolation. Value is created through collaboration and partnerships. Risks can arise if problems are not anticipated and important information remains hidden. Traditional risks in supply chains generally concern quality, cost effectiveness and reliability. Viewed through the ESG lens, the value chain must be viewed holistically, from the sourcing of products and the selection of suppliers to the treatment of workers and compliance with recognized standards.

- 13.2. A worker health and safety incident, a labor dispute or an allegation of corruption can have a serious impact on stakeholders throughout the value chain. The value chain is important and it is interconnected. Customers are increasingly voting with their feet and putting pressure on companies to make ethical decisions.
- 13.3. Ethical sourcing goes to the heart of the value chain. By looking at the entire value chain, from suppliers to end users, we can better understand the needs and implications of our company's decisions within these relationships. Ethical sourcing in an ESG context means that we pay attention to a supplier's carbon impact and an end user's labor practices.
- 13.4. Considering these impacts doesn't always mean refusing to work with someone in the value chain when there are concerns. Sometimes suppliers are limited and customers have every right to use our services. It's about understanding the risks in every relationship and taking targeted action to mitigate those risks.
- 13.5. For example, if there is a concern about a supplier's labor practices, we can ensure that clauses are included in the contracts to ensure an appropriate standard of employment for the supplier's employees. This can help actively change work practices, rather than simply refusing to work with a supplier. When working with a We may also require data center service providers to report emissions so that we can offset carbon consumption.

#### 14. Procurement taking into account ethical aspects

- 14.1. Risk Assessments: Conducting a value chain risk assessment to identify key vulnerabilities based on supplier and customer needs.
- 14.2. Real-time tracking: Real-time tracking and traceability of suppliers and movements of goods and services.
- 14.3. Screening, Risk Scoring and Monitoring: ESG due diligence of suppliers to assess and rank them based on their ESG profile and track record, and monitoring for ESG breaches.
- 14.4. Investigations: We investigate emerging ESG incidents in the value chain, provide remediation plans and take action us financial and reputational damage.
- 14.5. Incident Response Management: Build a robust internal corporate governance framework to respond to ESG issues in the value chain.

#### 15. Monitoring and Enforcement

- 15.1. We strive to proactively prevent and mitigate violations of this ESG policy.
- 15.2. Any violations or concerns, including ethical concerns or potential violations of our commitment to high ethical standards, should be reported through our reporting channels as soon as possible.
- 15.3. Management is regularly informed of the progress of this policy. Active participation and engagement at all levels of the organization is essential to ensure that all employees are engaged with ESG. We strive at least to comply with the legal regulations.