ENVIRONMENTAL, SUSTAINABILITY AND SUSTAINABLE SUPPLY CHAIN POLICY

PUBLIC INFORMATION

1. Introduction

At **NicePeopleAtWork, S.L. (NPAW)**, we recognize the importance of sustainability, environmental protection, and responsible supply chain management in shaping the overall performance and long-term success of our business. The way we manage our environmental footprint, our people, our data, and our supplier relationships has a direct impact on our environmental, social, and governance (ESG) commitments, as well as on our reputation and ability to create sustainable value.

We are committed to fostering responsible, fair, and transparent practices across all areas of our activity, ensuring that our operations and relationships uphold the highest standards of legality, quality, ethics, and sustainability. This **Environmental, Sustainability and Sustainable Supply Chain Policy** integrates ESG management into our business model and daily practices, strengthening ethical, innovative, and future-oriented business practices.

Through this Policy, approved by the **Board of Directors** and established by the **General Management**, NPAW defines the principles and commitments that guide our actions, ensuring positive impact, efficiency, and resilience while promoting shared value for our clients, employees, partners, and the communities where we operate.

2. Scope

This **Environmental, Sustainability and Sustainable Supply Chain Policy** is mandatory for all employees and activities that form part of NPAW's business model and value proposition.

It also extends to suppliers, subcontractors, partners, and third parties engaged in our value chain under agreements or contractual relationships with NPAW, to the extent that their activities may influence our environmental, social, or governance performance.

3. Principles and Commitments

3.1. Environment

3.1.1 Core Values

In line with NPAW's fundamental values, our environmental commitments are guided by:

- **Professional independence**
- **Respectful and ethical business conduct**
- **Promotion of responsible and sustainable actions** within the scope of our activity
- **Commitment to the sustainability of our services**
- **Commitment to fulfilling our clients' objectives**

3.1.2 Professional Services

We prioritize the **sustainability of our projects**, characterized by **rigorous study, professional detail, and a constant pursuit of energy efficiency** as a key objective.

3.1.3 Training and Involvement

We **train and involve all employees** in environmental protection and promote the participation of external agents, including partners and suppliers, who directly or indirectly contribute to NPAW's operations.

3.1.4 Environmental Objectives and Monitoring

We establish **environmental objectives** for each project or activity, defining **specific performance criteria** and ensuring effective management through **monitoring and review mechanisms**.

3.1.5 Sustainable Resource Management

We consider the environmental aspects of all activities, with a focus on:

- **Efficient use of energy resources**
- **Promotion of renewable energies**
- **Use of environmentally sustainable materials**
- **Efficient use of water**

3.1.6 Pollution Prevention and Wellbeing

We commit to **protecting the environment and preventing pollution** derived from our operations, while safeguarding the **health and wellbeing of people**. We also work to **reduce waste generation** and to manage waste responsibly across its entire life cycle.

3.1.7. Legal Compliance

We ensure **strict compliance** with applicable laws, regulations, and requirements, as well as any additional commitments voluntarily adopted by NPAW.

3.1.8 Continuous Improvement

We periodically **review the effectiveness of our Environmental Management System**, identify weaknesses, and implement actions for **continuous improvement** of our performance in environmental matters.

3.1.9 Stakeholder Engagement and Organizational Context

We identify **internal and external stakeholders** relevant to our environmental management system and ensure that their requirements are addressed. We also **analyze organizational context, opportunities, and risks** as the basis for planning and decision-making in environmental matters.

3.1.10 Emergency Preparedness and Response

We commit to identifying potential environmental emergencies and implementing procedures to prevent and respond effectively to them. This includes readiness for incidents that could have significant environmental impacts, periodic testing and training, and continuous improvement of response capabilities.

3.2. Sustainability

3.2.1 Integrating Sustainability into the Business

We integrate sustainability into all levels of the organization as a strategic priority, ensuring resources, risk management, and continuous improvement. As a technology company, we promote responsible innovation, ethical data use, efficiency, and solutions with positive impact.

3.2.2 Stakeholder Engagement

We engage with clients, employees, suppliers, partners, authorities, and communities through open dialogue, active listening, and transparent reporting on ESG performance.

3.2.3 Compliance with Laws and Ethical Principles

We comply with all applicable laws and internal regulations, upholding ethical conduct, transparency, and integrity in our operations and governance.

3.2.4 Commitment to People

We foster a safe, inclusive, and multicultural workplace that values diversity, wellbeing, and professional growth, encouraging collaboration, trust, and continuous learning.

3.2.5 Responsible Environmental Management

We reduce the footprint of our offices, digital services, and infrastructure by improving energy efficiency, promoting renewables, adopting sustainable technologies, and minimizing indirect impacts, in line with the broader principles set out in section **3.1 Environment**.

3.2.6 Responsibility to Clients and Consumers

We actively listen to our clients and partners, integrating their needs and expectations into the design and evolution of our technological solutions. We are committed to quality, technical excellence, and the reliability, security, scalability, and usability of our products and services. We ensure the protection of data processed in our operations, in strict compliance with applicable regulations.

3.2.7 Ethical and Responsible Use of Data

We ensure the ethical, responsible, and secure management of data in line with privacy, protection, and cybersecurity standards. Our preventive, risk-based approach safeguards confidentiality, integrity, and availability, while promoting a culture of transparency, accountability, and continuous improvement.

3.2.8 Positive Community Impact

We support initiatives that promote social wellbeing and awareness of key societal challenges. Our goal is to generate a positive impact in the communities where we operate, while minimizing negative impacts and respecting cultural and natural heritage.

3.2.10 Human Rights Responsibility

We respect internationally recognized human rights in both our direct operations and our global value chain. We are committed to preventing adverse human rights impacts and, when necessary, to applying due diligence measures, contractual reviews, or disengagement. We guarantee respect for dignity, equal treatment, freedom of expression, and non-discrimination in all activities.

3.2.11 Contribution to the 2030 Agenda

We are committed to the **United Nations 2030 Agenda and its Sustainable Development Goals (SDGs)**. Through our activities, we aim to generate positive impacts on the environment, society, and the communities where we operate, contributing to a better shared future.

3.3. Sustainable Supply Chain

3.3.1 Responsible Procurement and Subcontracting

All procurement and subcontracting processes at NPAW are based on **objectivity, transparency, equal opportunities, and non-discrimination**. We prohibit any form of favoritism and require all suppliers to strictly comply with applicable laws, industry regulations

(e.g., data protection, cybersecurity), and this Policy's ethical and sustainability principles. Suppliers involved in fraud, corruption, or other criminal activities will be automatically excluded.

Suppliers providing IT, technology, or outsourced services that are critical to NPAW's operations must also comply with applicable national or international security frameworks relevant to the services provided, when applicable.

3.3.2 Ethical and Professional Relationships with Suppliers

NPAW staff must always engage suppliers with **professionalism, integrity, and respect**, ensuring that our relationships reflect our values and Code of Conduct. Conflicts of interest must be identified, reported, and managed through our compliance framework, supported by internal reporting channels.

3.3.3 ESG Risk Management in Procurement

NPAW integrates **Environmental, Social, and Governance (ESG) criteria** into supply chain management. We assess short-, medium-, and long-term risks associated with suppliers, particularly regarding technology services, digital infrastructure, data management, and professional services. When appropriate, preventive, corrective, or mitigating measures will be applied.

Suppliers are required to promptly notify NPAW of any incidents with potential environmental, information security, or privacy impact, and to cooperate fully in managing and mitigating such events.

3.3.4 ESG Criteria in Supplier Selection

We promote sustainable procurement by incorporating **environmental, social, and governance factors** into supplier selection and evaluation:

- **Environmental**: energy efficiency, use of sustainable data centers, carbon footprint reduction, circular economy practices, and verifiable environmental commitments.
- **Social**: dignified working conditions, respect for human rights, diversity and inclusion, compliance with labor standards, rejection of forced and child labor.
- **Governance**: data privacy, information security, business ethics, compliance with anti-corruption and anti-bribery laws.

Preference will be given to suppliers that can demonstrate adherence to ESG standards, including recognized certifications (e.g., ISO 14001, ISO 27001, ISO 27701) or equivalent.

3.3.5 Procurement Categories

NPAW frames its supply chain practices under four complementary approaches: **green procurement** (minimizing environmental impact), **ethical procurement** (ensuring fair working and business conditions), **social procurement** (supporting local communities and positive social impact), and **responsible procurement** (embedding ethical and sustainable values throughout the decision-making process).

3.3.6 Human and Labor Rights

Suppliers must comply with international standards on labor and human rights, including the **ILO Conventions 138 and 182** on minimum age and elimination of child labor, as well as international conventions on forced labor, non-discrimination, fair wages, working hours, and freedom of association and collective bargaining.

3.3.7 Preference for Responsible and Local Suppliers

Whenever feasible, we will prioritize **responsible suppliers with local presence** in the communities where NPAW operates, supporting local development and minimizing environmental impacts associated with logistics.

3.3.8 Stable and Transparent Contractual Relationships

We aim to build **long-term partnerships** with our suppliers, grounded in transparency, trust, and shared value creation. Contractual agreements should reflect NPAW's sustainability commitments and the expectations placed on suppliers.

3.3.9 Supplier Dialogue and Feedback

We promote continuous **dialogue with suppliers**, encouraging them to share feedback, improvement proposals, and concerns. This two-way communication fosters innovation, strengthens trust, and supports the joint achievement of sustainability objectives.

4. Governance, Oversight, and Approval

This Policy is **approved by the Board of Directors of NPAW** and established by the **General Management**, which allocates the necessary resources for its implementation.

The Policy is binding for all employees and collaborators, and compliance will be periodically monitored as part of NPAW's Integrated Management System. Regular reviews ensure that it remains effective, aligned with business needs, and consistent with our broader sustainability and ESG framework.

Barcelona, 29th of September of 2025

Sergi Vergés Gassó