

# Environment, Social, and Governance (ESG) Policy



## **1. Introduction**

Spotler Group BV is committed to conducting its business operations in a manner that promotes environmental sustainability, social responsibility, and ethical governance practices. This Environment, Social, and Governance (ESG) Policy reflects our dedication to integrating ESG considerations into our decision-making processes and daily operations.

## **2. Scope**

This policy applies to all individuals associated with (one of the companies of) Spotler Group BV, including employees, managers, directors, volunteers, contractors, consultants, and agents.

## **3. Environmental Responsibility**

- We are committed to minimizing our environmental impact by reducing resource consumption, energy use, waste generation, and greenhouse gas emissions.
- We comply with all relevant environmental laws, regulations, and standards and strive to exceed compliance wherever possible.
- We continuously assess and improve our environmental performance through the implementation of sustainable practices, technologies, and initiatives.
- We have a Spotler charity committee who is committed to do a check on all the above and comes with initiatives to lowering carbon emissions.

## **4. Social Responsibility**

- We recognize the importance of supporting and contributing to the well-being of our employees, customers, communities, and society at large.
- We promote diversity, equity, and inclusion within our workforce and provide equal opportunities for all employees to develop and succeed. See also our Diversity & Inclusion policy or contact our D&I crew.
- We prioritize health and safety in the workplace and strive to create a safe and supportive environment for all employees.

## **5. Governance Practices**

- We are committed to upholding high standards of corporate governance, transparency, and ethical conduct in all our business activities.
- We establish and maintain clear policies, procedures, and internal controls to ensure compliance with applicable laws, regulations, and ethical standards.
- We maintain accountability and integrity in our decision-making processes and disclose relevant information to stakeholders in a timely and transparent manner.

## **6. Compliance**

- We comply with all applicable ESG laws, regulations, and industry standards and continuously monitor changes in requirements to ensure compliance.

## **7. Continuous Improvement**

- We are committed to continuous improvement and will regularly review and update our ESG policies, practices, and performance metrics to reflect changing priorities and emerging best practices.
- We encourage innovation and collaboration to find sustainable solutions to environmental and social challenges and promote a culture of responsible stewardship.

## **8. Review and Revision**

This Environment, Social, and Governance (ESG) Policy will be reviewed periodically and updated as necessary to ensure its continued alignment with our values, goals, and best practices in ESG.