

Environmental, Social and Governance Policy Statement

This ESG Policy Statement is produced by the Directors of APFutura Telecoms SL ("the Company"). The Company is committed to a positive and responsible course of action with regard to those aspects of the business, which impact upon the environmental, social and governance.

The Company is committed to a positive and responsible course of action and it aims to ensure so far as it is applicable and reasonably practicable that its operations will be carried out with a commitment to:

- 1 Protecting and enhancing the environment by minimising negative impact and maximising positive impact on the environment;
- 2 Ensuring appropriate conduct towards, positive impact on and good relationships with employees, customers/clients, suppliers and the community in which it operates; and
- 3 Conduct its business with integrity and high standards of business ethics, through appropriate structures, systems, processes and procedures (the Company's "ESG Commitment").

In fulfilling the ESG Commitment, the Company seeks to:

- 1 Comply with all applicable local and national laws, rules, regulations and other measures having the force of law that are relevant to any aspects of its ESG Commitment; and
- 2 Where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of its ESG Commitment which are higher than the standards imposed by law.

The Company's ESG Commitment seeks to ensure that all employees, sub-contractors and suppliers must, in carrying out their duties, adhere to the principles and objectives of this ESG Policy Statement. The Company is committed to ensure that training is made available to employees to ensure that they are familiar with, and work in accordance with, this ESG Policy Statement.

The Company expects suppliers of goods and services to the Company and contractors working for the Company and their suppliers and sub-contractors to adopt and implement the ESG Commitment in their own businesses.

The Company's ESG Commitment and targets were set at a Board Meeting after reviewing legislation. The targets address the following key areas:

Environmental

The Company has reviewed and produced the following objectives as a framework for the introduction of practices to implement the environmental aspects of the ESG Commitment:

- Identifying and managing environmental risks and hazards
- Operating management procedures to include environmental factors during business planning and implementation of projects

- Communicating on environmental matters freely with government officials, employees, customers and members of the public
- Carrying out of environmental audits when required
- Promoting a culture of environmental awareness amongst all employees
- Providing training for all employees as appropriate to enable them to carry out their job functions in a manner that shows care for the environment
- Review and acting to reduce, the carbon footprint of business activities
- Minimising of waste by evaluating operations and ensuring they are as efficient as possible
- Managing waste generated from business operations according to the principles of reduction, re-use and recycling
- Promoting environmentally friendly responsible purchasing

Social

The Company has produced the following objectives as a framework for the introduction of practices to implement the social aspects of the ESG Commitment:

- Prohibiting any bribery or corruption of, or by, any of its officers or employees
- Prohibiting any money laundering by any of its officers or employees
- Encouraging ethical behaviour and decision making within the Company and amongst its supply chain
- Ensuring compliance by the Company with workplace health and safety laws and standards, and mitigating risks to health and safety in the workplace
- Maintaining suitable privacy and data security measures in respect of all stakeholders of the Company
- Maintaining an inclusive and collaborative workplace where the wellbeing of employees is a high priority
- Promoting diversity and inclusion amongst the Company's workforce
- Providing and maintaining a working environment free from all forms of discrimination, harassment and bullying under any circumstances, for example gender, gender identity or expression, race, colour, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital status or sexual preference
- Ensuring that the Company does not select, engage, place, promote, transfer or compensate or otherwise treat or deal with any employees on the basis of gender, gender identity or expression, race, colour, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital status or sexual preference

- Creating a positive and rewarding workplace for the Company's employees

Governance

The Company has produced the following objectives as a framework for the introduction of practices to implement the governance aspects of the ESG Commitment:

- Ensuring that the Company complies with, at least, all applicable local and national laws and regulations, relevant standards and codes of practice relating both generally and in particular to transparency and corporate governance
- Establishing clear and effective governance for ESG, promoting the use of best practice on corporate governance when relevant and possible, and setting goals and establishing accountability [through the Company's ESG committee] and reports to its board
- Ensuring that the Company promotes strong oversight and transparency at all levels of its organisation
- Ensuring that the Company maintains exemplary board stewardship and management accountability
- Ensuring that the Company adopts and implements adequate internal controls, processes, procedures and proactive risk management
- The Company is committed to establishing and maintaining high standards of business ethics through a strong code of ethics and business conduct, ongoing ethics training and promotion of a culture of integrity, honesty, ethical and responsible conduct in its business activities and behaviours
- The Company is committed to ensuring that no corruption, bribery, money laundering or internal misconduct activities are taking place in the business
- Establishing and maintaining detailed policies covering anti-bribery and corruption, code/s of conduct, conflicts of interest, privacy and human resources, as part of the governance structure of the Company
- Engaging with stakeholders [regularly] about ESG issues

Measuring and Reporting Compliance

The Directors will adopt and implement (and vary from time to time as they deem necessary) detailed clear written requirements for the Company to monitor and report on the Company's compliance with this ESG Policy Statement, including:

- metrics and methods for measurement, by the Company, of compliance sufficient to show trends over time and progress against established objectives [and [any] targets]; and
- requirements as to reporting to stakeholders at regular intervals [not exceeding [12 months]] on the information derived from that measurement [and on disclosures on ESG issues].

The Directors will publish to stakeholders all of those written requirements when they are adopted and whenever they are varied.

Status of this ESG Policy Statement

The Directors endorse this ESG Policy Statement and are fully committed to its implementation.

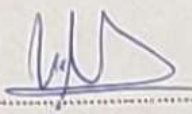
This ESG Policy Statement will be regularly reviewed and updated as necessary.

This ESG Policy Statement will be published on the Company's public website so that it is freely available to all stakeholders and others to view.

This ESG Policy Statement has been approved and authorised by:

Name: **VICTOR DOT PIULACHS**

Position: **CEO**

Signature: 

Dated: 30/04/24