STARTEAM GLOBAL Sustainability Policy (2026 Reviewed Version)

Last updated: May 2026

Review cycle: Annual

Applies to: All directors, employees, contractors, and suppliers

Publicly available: Yes

Introduction

STARTEAM GLOBAL is committed to conducting business ethically, responsibly, and sustainably across our operations and value chain. We care about reliable connections – with our customers, employees, suppliers, communities, and the planet.

Our resilience is built on core values of respect, integrity, and accountability. Sustainability is a core element of our company-wide vision and long-term strategy.

This policy aligns with the following internationally recognised frameworks:

- CSRD (ESRS E1, E4, S1, G1)
- EU Corporate Sustainability Due Diligence Directive (CSDDD)
- IFRS S1 and S2
- Science Based Targets initiative (SBTi)
- UN Guiding Principles on Business and Human Rights
- UN Global Compact (Ten Principles)
- GRI Standards
- OECD Guidelines for Multinational Enterprises

This policy sets out our overarching sustainability principles. Detailed environmental commitments and quantitative targets are contained in our standalone Environmental Sustainability Policy.

Scope

This policy applies to STARTEAM GLOBAL and sets out sustainability standards and expectations across operations and the value chain, including suppliers. It covers all products, services, and operations across our entire value chain.

Policy Commitments

1. People and Human Rights

STARTEAM GLOBAL respects and protects human rights in line with the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and applicable laws including the Modern Slavery Act and Bribery Act.

Commitments:

- Provide a safe, healthy and inclusive workplace for all employees
- Support diversity, equity and inclusion with zero tolerance for discrimination or harassment
- Prohibit child labour, forced labour and modern slavery in our operations and supply chain
- Regularly review remuneration practices to support fair and responsible compensation
- Respect freedom of association and the right to collective bargaining
- Engage early and meaningfully with stakeholders, including local communities and indigenous organisations
- Support local employment, skills development and community investment through donations, volunteering and sponsorships
- Provide effective grievance mechanisms for workers and stakeholders to raise concerns without fear of retaliation

Quantitative targets:

- Maintain a zero-incident target for child labour, forced labour and modern slavery across operations and supply chain
- Maintain a zero-incident objective for substantiated human rights violations, supported by governance and grievance mechanisms
- Maintain a zero incident objective for work-related fatalities
- Reduce Lost Time Injury Rate (LTIR) to below 0.5 by 2028 (2024 baseline)
- Annual living wage assessment covering all employees
- At least 90% employee participation in the annual engagement survey by 2028

2. Environmental Stewardship

STARTEAM GLOBAL is committed to protecting the environment, addressing climate change, preserving biodiversity, and transitioning to a circular economy.

Our detailed environmental commitments, including quantitative targets for GHG emissions, renewable energy, biodiversity, circular economy, water, waste, and supply chain responsibility, are set out in the STARTEAM GLOBAL Environmental Sustainability Policy.

High-level environmental principles include:

- Complying with all environmental laws and regulations
- Understanding, minimising, and where appropriate offsetting our direct and indirect environmental impacts

- Reducing the consumption of energy, water and natural resources across all operations
- Following the waste hierarchy of avoid, reduce, reuse and recycle
- Preventing pollution at source and managing waste responsibly, including e-waste through certified channels
- Purchasing environmentally friendly products and services where feasible
- Protecting and supporting biodiversity and ecosystems
- Working with our supply chain to incorporate environmentally sustainable goals into everyday business
- Serving as an environmentally responsible neighbour in our communities
- Promoting environmental awareness throughout the company and fostering a sustainably aware culture with clear accountability
- Conducting audits, evaluations and self-assessments to ensure implementation of this policy
- Raising environmental awareness in our communities, encouraging participation, and training employees on environmental and social matters
- Continuously improving our environmental performance

3. Governance, Ethics and Economic Sustainability

STARTEAM GLOBAL is committed to the highest standards of integrity, transparency, and ethical conduct in all business dealings, while integrating sustainability into our economic model.

Commitments:

- Prohibit bribery, corruption, fraud, and money laundering in all forms
- Maintain a confidential whistleblower channel for reporting misconduct without fear of retaliation
- Comply with all applicable anti-corruption laws including the Bribery Act 2010 and local legislation
- Ensure fair competition and prohibit anti-competitive agreements or abuse of market position
- Avoid conflicts of interest and require disclosure of any potential conflicts
- Provide mandatory annual ethics training to all employees
- Reduce operating costs through improved resource management including water, waste, energy and carbon
- Manage risks of operational disruptions such as resource scarcity, climate change impacts and community risks
- Add value to products and services that support sustainable markets

Quantitative targets:

- Zero substantiated incidents of bribery or corruption – ongoing
- Achieve full completion of mandatory ethics training, supported by monitoring and reporting
- Conduct regular review of whistleblower channels and related processes

4. Employee and Stakeholder Engagement

We provide mandatory annual sustainability training to all employees covering human rights, ethics, and environmental topics. We engage suppliers, customers and local communities through regular dialogue and collaborative initiatives.

Reporting and Disclosure

STARTEAM GLOBAL is committed to transparent, consistent and accurate disclosure of sustainability performance.

Reporting alignments: CSRD (ESRS E1, E4, S1, G1), IFRS S1 and S2, GRI, CDP and EcoVadis

Public disclosures:

- Annual Sustainability Report aligned with GRI and ESRS
- GHG Inventory Report verified to ISO 14064
- CDP response covering Climate and Water
- EcoVadis scorecard
- UN Global Compact Communication on Progress

Responsibility and Review

This policy is the responsibility of STARTEAM GLOBAL Management, overseen by the ESG Committee and coordinated by the Sustainability Manager.

The policy will be reviewed annually. Progress against quantitative targets is reported in the Annual Sustainability Report.

Approved by

Daniel Jacob

Owner and Chief Executive Officer

STARTEAM GLOBAL

May 2026