

Complyport Corporate and Social Responsibility (CSR) and Environmental Social and Governance (ESG) Policy

Aim of the CSR and ESG Policy

Through Corporate Social Responsibility ('CSR') and Environmental Social and Governance ('ESG'), we at Complyport endeavour to go beyond the core business focus and contribute to the well-being of all stakeholders, including our community at large. As a firm, we believe that sustained economic growth cannot happen without social progress and the well-being of our staff, our clients and our wider communities.

Four (4) Principal Areas of the CSR and ESG Policy

1. Our **PEOPLE** are central to everything we do. We strive to create a safe, healthy and inclusive workplace, including exchanging and broadening our skills and experience. Our Employees are among the Company's greatest assets. Through diverse talent strategies, Complyport strives to cultivate a pleasant, inclusive and productive work environment for our employees. As an employer, we support and empower our employees to unleash their potential and succeed in their career.

We know that we are only as good as our people, and so we endeavour to create an employee-led environment that encourages and values diversity, equality and inclusion and evolves ergonomically in line with the needs and background of our people. We know that we can only build and grow effectively and efficiently if we harness the variety of thinking, approach, skills, and innovation that comes from our people and from the differences that individuals bring. Complyport recognises that the needs of our colleagues and stakeholders are constantly changing and that by having a wide range of views and experiences, we are in a better position to meet these needs, or at least understand what changes we may need to make to do so. We endeavour to promote and embrace diversity and to respond to the needs of all colleagues and stakeholders connected to Complyport in a fair and equitable manner whilst observing our commitment and responsibility to current legislation.

Employee Well-being

We promote work-life balance and implement measures to maintain the health and well-being of our employees, including regular safety training to new and existing staff. We value the differences that people bring from all backgrounds and communities and encourage staff to be themselves both in and outside of work. We offer flexible work arrangements to support employees in balancing their personal and professional responsibilities. Weekly work hours are based on a flexible schedule and attendance to the office can be adjusted providing a hybrid office/work-from-home environment. Complyport Management and HR are committed to maintaining a great working environment, with a culture of continuous people practices improvement, characterised by best practices, technology, and creativity. For this reason, during the summer months our employees are allowed to work 32 hours per week, tantamount to a 4-day week.

Talent attraction and retention

We ensure that our staff recruitment and selection processes are fair, transparent, and accessible to all. We create an 'Investment in our People' initiative focusing on upskilling our staff while we invest in our future staff and leaders through our 'Graduate Training Programme' which accepts new recruits every year. Complyport has an appraisal system and incentive bonus schemes are in place to motivate and reward employees.

2. Our **COMMUNITY**, where we live and make our living. Our community initiatives span from pro bono work and volunteering to charitable donations.

Some of the ways we are involved in our communities are as follows:

- Working with charities to help provide internships and develop skills and experience opportunities for individuals with learning difficulties
- Supporting local food and clothing banks by coordinating collection drives
- Contributing and supporting charities through volunteering time and donations

3. Our **ENVIRONMENT** is where we strive to build sustainable communities through a combination of innovative business practices and exemplary ESG performance. This commitment permeates all aspects of our business operations and values, including how we operate Conplyport and collaborate with our stakeholders. We are committed to reducing our energy and carbon impacts to encourage a healthier environment for our business, our people and our wider community. The most energy-consuming elements of our facilities are our infrastructure, IT equipment, and offices. We have formulated a policy for maintaining the temperature of offices, buildings, and general facilities between 24°C and 26°C. We also review our buildings' management systems and energy consumption quarterly and minimise electricity consumption by upgrading equipment and facilities. Conplyport understands the importance of enhancing energy efficiency and reducing our carbon footprint in our daily business operations to combat climate change. To mitigate the effects of global warming, we have been using eco-friendly refrigerants in our new air-conditioning systems.

Some of the ways that we are committed to ESG are as follows:

- Ensuring any business travel is justified and necessary
- Using more locally owned and manufactured goods to help local businesses
- Phasing out old legacy equipment by using new systems with improved energy efficiency
- Replacing fluorescent tubes with LED lights
- Installing LED lights where applicable
- Installing occupancy sensors for lighting control in staircases and car parks
- Reviewing and adjust the operating control of chiller systems
- Modernising of lifts
- Switching off non-essential display monitors
- Shortening the operating hours of air conditioners in some offices (conferences)
- Conplyport offices are designed and maintained to the highest environmental standards. All power supplies including air-conditioning systems, backup generators and other electrical services for our facilities, have adopted the most advanced environmentally friendly technologies.

Waste management

- We follow the principle of waste hierarchy, including reuse, recycling, reprocessing, and responsible waste disposal, to better manage the waste generated. We regularly evaluate the effectiveness of our waste management approach to determine the best options that create minimal impact on the environment.
 - Strict waste management instructions have been put in place to ensure proper waste disposal. Hazardous waste such as industrial batteries, waste electrical and electronic equipment and general office batteries are handled by collectors to follow the relevant process of reuse, while non-hazardous waste is handled by professional cleaning service providers.
 - We organise recycling programs for employees to facilitate the recycling and reuse of waste materials. These include toner and ink cartridges, and paper (paper shredder machine).
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4. Doing **BUSINESS and MAKING DECISIONS RESPONSIBLY**. Ethics, professional standards and risk management are our priority. Ethics are globally recognised principles of fairness and “what is right”. Complyport is committed to conducting its business and operations with high standards of ethics, honesty and integrity in accordance with all applicable laws and regulations and Complyport’s policies. This requires all members of Complyport to uphold an aligned standard of behaviour that exceeds statutory mandates. In this regard, Complyport’s policies provide practical guidelines on business conduct. Topics covered include but are not limited to:

- Bribery, gifts, and entertainment
- Conflicts of interest
- Discrimination, harassment, and inappropriate conduct
- Equal opportunities
- Money laundering and terrorist financing
- Privacy and information protection
- Workplace health and safety

From the Board down, we ensure that the application of our processes, procedures and behaviours consider the impact upon our people, our stakeholders, our clients and our communities at all times.

Clients

To build a long-term relationship with our clients, Complyport endeavours to provide exceptional client experience and high-quality services. We also strive to help our clients make informed decisions by providing accurate and transparent information on our products and services. We have in place stringent internal policies on client privacy and advertising. We regularly monitor relevant new laws and regulations so that we can communicate them in a timely manner to the responsible operational units.

Client Data Privacy

Client data privacy and protection is ranked as the most prominent topic in our engagement with clients. We strictly follow our internal policies, procedures and compliance guidelines governing how we collect, use, and manage clients’ information. These clearly define the roles and responsibilities of our staff in handling personal data, and stipulate appropriate security measures to achieve confidentiality, integrity, and accountability. The policies and guidelines are reviewed periodically to ensure they are up to date with the latest regulations, technology and industry best practices.

Client Service and Satisfaction

Complyport regards client service and client satisfaction as core indicators of service quality. We constantly communicate with our clients to collect feedback and further our understanding of their expectations. A wide range of communication channels are provided to our clients, including online enquiry, email, post and client service representatives in offices.

CSR / ESG Vision and Objectives

Complyport intends to achieve the objectives of the above 4 Principal Areas by:

- a) Establishing a guideline for compliance with the provisions of all relevant CSR / ESG regulations
 - b) Moving a step beyond the guidelines and enhancing them by the addition of our own vision of what is right
 - c) Being encouraged at all levels to think beyond the guidelines and apply a principle of “doing what is right” as it applies to our people, our clients, and our community
 - d) Adopting the belief that whilst something may be lawful, it can still be awful and dedicating ourselves to eradicating any such behaviour or practices
 - e) Dedicating a percentage of Complyport’s profits for social benefit/projects
 - f) Ensuring the implementation of CSR / ESG initiatives through appropriate procedures and reporting through and up to the Board, and
 - g) Creating or supporting opportunities for employees to engage in socially responsible initiatives.
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CSR / ESG Budget

The Board shall ensure that in each financial year, Complyport spends an agreed amount of the net profit on CSR / ESG initiatives and activities.

Complyport may collaborate or pool resources with other organisations to plan, implement, monitor and report CSR / ESG activities.

Governance of the CSR / ESG Committee

A Complyport Committee is elected for a two-year term. Responsibility of the Committee is defined in the Terms of Reference as follows:

- a) To recommend to the Board, a CSR / ESG Policy specifying activities to be undertaken and amendments to the Policy as necessary from time to time.
- b) To recommend the amount of expenditure to be incurred on CSR / ESG initiatives and activities.
- c) To obtain the views and recommendations of other employees for CSR / ESG initiatives and activities.
- d) To monitor the implementation of the CSR / ESG Policy.
- e) To constitute a transparent monitoring mechanism for ensuring implementation of CSR / ESG projects.
- f) To obtain professional advice, if needed, to further CSR / ESG or its monitoring activities.

Monitoring and Review of the Policy

The Committee shall submit a report at a minimum frequency of once per year to the Board. The report shall detail the progress, initiatives and activities undertaken.

Complyport, if needed, may choose to engage the services of an external agency to identify appropriate projects and to collaborate on and progress such projects. The Board shall ensure that the Committee reports the activities on Complyport's website.

The Board at its discretion, on its own and/or as per the recommendations of the Committee may amend this Policy, as and when required or as necessary and in accordance with any spirit of the Policy. Any or all provisions of the Policy would be subject to revision in accordance with the regulations as may be issued from relevant statutory authorities, from time to time.

Complyport is a leading financial services consulting firm with clients that include regulators, banks, funds and fund managers, investment firms, brokers, fintech firms, insurance firms and payment and electronic money institutions. Our expert team, currently comprising over 400 high-calibre professionals, provides unique and tailored solutions in licensing, regulatory compliance, risk management, internal audit, human resources, regulatory technology, information technology, business resilience, information security including cybersecurity, governance, executive training, and innovation consulting to financial and other firms, serviced by our offices in the UK, Malta, Cyprus, and UAE, coupled with a robust international network. This enables us to address regulatory challenges worldwide, spanning the UK, EU, Switzerland, the Middle East, the US, Australia, New Zealand and Asia.