

**MODULAIRE GROUP**  
**Environment, Social and Governance and Sustainability (ESGS) Policy**

**1. ENVIRONMENT, SOCIAL AND GOVERNANCE AND SUSTAINABILITY STATEMENT**

Modulaire Group is committed to a responsible approach towards its employees, customers, suppliers, local communities, the environment and society. Responsible management and business success go hand in hand and, as such, Modulaire has embedded consideration of ESG factors throughout all of its business activities. We are fundamentally committed to building a long-term sustainable business, which will grow, provide employment and generate economic benefit in an environmentally and socially responsible manner.

The main areas of focus for responsible business relate to the environmental and social impact of our activity, and the manner in which it is governed. We will take a robust and responsible approach towards the environment, society and corporate governance to build our success we have defined these factors as Environmental, Social and Governance and Sustainability (ESGS).

Working with three global frameworks and benchmarks for our contribution to our people, broader society and climate-related risks and opportunities.

- (a) United Nations Sustainable Development Goals (UNSDG)
- (b) United Nations Global Compact (UNGC)
- (c) Task Force on Climate-related Financial Disclosures (TCFD)

**2. ABOUT THIS POLICY**

This policy sets out our approach to ESGS and the promotion of responsible business.

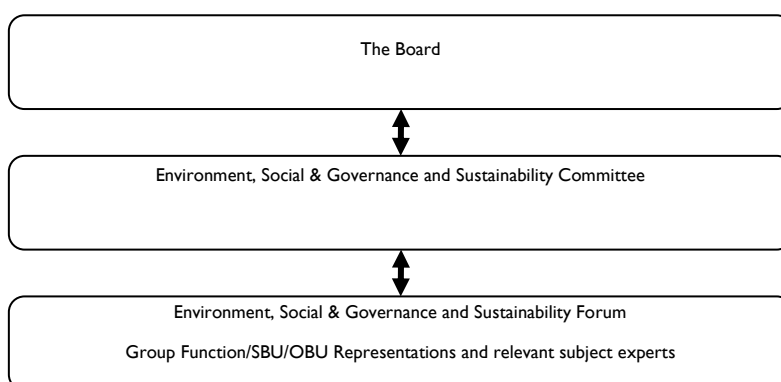
**2.1 The policy's purpose is to:**

- (a) Promote ESGS throughout all business activities and processes to reduce or mitigate environmental and social impacts and improve governance and sustainable practices
- (b) Environment
  - (i) Provide customers with sustainable and circular solutions (loops within loops)
  - (ii) Assist to increase the sustainability performance of our supply chain

- (iii) Design and deliver safe, energy-efficient and low carbon solutions to our customers using clean and innovative technology where possible
      - (iv) Reduce the environmental (energy, carbon, water and waste) and social impacts of our activities, on-site, services, and off-site
    - (c) Social
      - (i) For employees, contractors and visitors provide a safe, inclusive, diverse, motivating environment
      - (ii) Promote organisational and behaviour change to meet ESGS commitments
      - (iii) Create opportunities to empower our employees to add value for our customers, suppliers and communities
      - (iv) For communities act responsibly and create value through our Group initiatives and focused local programs
    - (d) Governance
      - (i) Strict compliance to any applicable local legislation in relation to ESGS.
      - (ii) Require all Group functions and business units to contribute and report on the ESGS group commitments and targets
      - (iii) Achieve sustainable growth and performance through responsible corporate governance with an open dialogue with all stakeholders
    - (e) Sustainability
      - (i) Support commitments to the UN Sustainable Development Goals (SDGs 4, 5, 9, 11, 12, 13.), UNGC (Human Rights, Labour, Environment and Anti-Corruption), the TCFD framework to establish NetZero climate action plan
- 2.2 The Group General Counsel and ESGS Director are responsible for this policy, ensuring its implementation and the provision of any necessary resources.
- 2.3 Strategic Business Units (SBU) have responsibility for co-ordination, supporting, reporting and in the main the delivery of this work. SBU's will ensure that all local policies and procedures are consistent with this ESGS Policy and all commitments and KPI data is reported to the group is accurate and maintained.
- 2.4 The Board and Executive Committee are supportive of this policy.
- 2.5 This policy is an overarching policy, which applies wherever we do business. However, if any provisions of the policy conflict with local law requirements in countries where we operate those local laws will prevail.

### 3. MANAGEMENT OF ESGS

- 3.1 The principal role of the ESGS Committee and ESGS Forum is to assist the Board in articulating and developing its ESG and sustainability strategy and providing oversight of sustainability initiatives across the Company and its subsidiaries and affiliates (the "Group"), in line with the purpose, values and strategy of the Group as established by the Board. This includes monitoring of the content and completeness of the group's external statements, disclosures and other reporting on ESGS matters. The ESGS Committee Terms of Reference define the functions, roles and actions of the ESGS Committee and the Board.
- 3.2 The ESGS Director will be responsible for the direction, management, implementation and updating the ESGS strategy, commitments, targets and annual ESGS report and the Management of the ESGS Committee and ESGS Forum.
- 3.3 Group Functions, Strategic Business Units (SBU) and Operating Business Units (OBU) Representatives will communicate the Group ESGS strategy and targets and undertake the required actions to contribute to overall group commitments and provide information and reports in a timely and accurate manner to the ESGS group function and committee.
- (a) Sustainability and ESG actions and outputs will be coordinated and reviewed using the following hierarchy.



### 4. STRATEGY REVIEW

- 4.1 The following actions and activities are reviewed for progress, updates, and communication:
- (a) The ESGS strategy aligned to the three frameworks of the UNSDG, UNGC and TCFD represents the strategic and tactical intent to establish ESGS commitments uniformly across the Group, advancing the approach to environmental, climate, social governance and sustainability related risk and opportunities.

- (b) Materiality Matrix and Stakeholder Mapping represent the concerns and opportunities addressed in the strategy.
- (c) The NetZero Roadmap focuses on reducing and removing both operational and embedded carbon in our products thereby creating business opportunities adhering to the TCFD framework and the circular economy principles.
- (d) The ESGS KPI dashboard represent the commitment and timelines for actions for the strategic intent.
- (e) We are committed to communicating the ESGS actions to all our stakeholders. The annual ESGS report will disclose commitments and progress. The Group website will highlight relevant disclosures and case studies from the Group.