



Policy on Ecological Sustainability

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Our policy on Ecological Sustainability

Preamble

Newt Global recognizes that our business decisions have the potential to impact surrounding communities and the environment. Balancing environmental and human rights issues with our business is fundamental. Newt as an organization is extremely conscious of social & ecological challenges faced by planet earth. We believe that business can't be separated from these challenges, and we consider them key economic drivers.

The triple bottom-line of Economic, Environmental and Social good are an integral part of our approach to responsible Corporate Citizenship.

Our operations and value chain result in direct and indirect impacts on the environment on account of use of energy, materials, water and land as input-factors. Newt Global does not produce any solid waste products and has minimal carbon footprint directly. Newt Global however recognizes its fiduciary responsibility to minimize the indirect environmental impact of its business activities and to protect the ecological commons upon which the future survival of humanity depends.

A fundamental principle of our approach is that our environmental policy must not only address immediate needs of operational efficiency but must also incorporate a longer-term view of environmental and social stewardship towards future of the humanity.

Our Environmental Policy

Newt Global's environmental policy has been designed with the vision that a good policy must serve as a lighthouse showing the right direction and as a catalyst for activating positive change. Environmental stewardship and Corporate Citizenship are an integral part of our core values. This policy is applicable to all divisions and across countries.

The key principles of our policy are as below:

Regulatory compliance in letter and spirit:

Newt Global believes that environmental regulations have a critical role to play in sustainable development. Newt Global will comply in letter and spirit with all environmental laws, regulations, codes of practice and directives, as applicable to us in every geography we operate in. We will also strive to go beyond compliance through an integrated vision of thought and action that are environment positive.

Reducing Newt Global's operational footprint:

Newt Global will strive to reduce and minimize the ecological footprint of its internal operations. Our focus will primarily be on four dimensions: (i) Reduction in Energy across the company (ii) Increase in the efficiency of use and recycling of water, (iii) Sustainable Waste management (iv) Reduction in use of paper and paper products

We will do all this through multi-pronged approach based on our medium/long term vision:

- (i) Setting rigorously defined goals that are based on globally accepted scientific principles
- (ii) Establishing good governance and robust execution processes and
- (iii) Implementing best practice solutions and technologies.
- (iv) Avoid use of Non-Green or Hazardous material. Greenest Way for Disposal of minimal hazardous material we might produce

Some of these approaches have been translated in actions:

- (i) Minimize use of paper and encourage use of digital storage media, emails etc.
- (ii) We encourage our employees to shut down laptops, computers, and mobile phones when not in use or put them in low power consumption mode. We have made a concerted move to LEDs as energy saving lights across all our offices. We are also considering other options to improve further.
- (iii) We have initiated reduction in use of plastic bottles across the company and switched to the use of water filters which are much more efficient and avoid wastage and improve green footprint.
- (iv) Being an IT software company, our most hazardous materials include our computers, laptops and mobile phones which go out of operation. We follow rules of each city, country, and geography to dispose of such hazardous material in a manner that has the least environmental impact and achieves highest possible recycling.
- (v) Encourage minimizing or avoiding business travel (use of collaboration tools like TEAM access to everyone). Minimize travel by Business / First class

Most of our actions highlight direct/indirect benefit to employees which creates positive momentum for our sustainability initiatives.

The climate crisis poses one of the biggest threats to humankind, the impacts of which will be global with vulnerable communities being hit the hardest. As a responsible corporation, we are committed to minimizing our impact and have set for ourselves the goal of Net Zero

greenhouse gas emissions for Scopes 1,2 and 3 by the year 2040 in line with the Paris agreement with clearly defined intermediate targets. A basic principle underlying our efforts will be a predominant focus on direct decarbonization with deferment of offsets to the target year. We are actively exploring some of the software companies like Melior Health Group which has a good software to help us manage this footprint analysis and set up measurable targets accordingly.

Integration with business strategy:

We will integrate critical environmental issues into our core business strategy. The key elements of this are the incorporating of environmental risks into our Enterprise Risk Management (ERM) strategy, improving resource and cost efficiencies of our operations sustainable procurement policies and customer stewardship. For example, our ‘customer stewardship’ approach will be based on offering a comprehensive portfolio of solutions that will help our customers reduce their environmental footprint. We must also ensure that potential impacts to community health, safety, and security – such as accidents, impacts on natural resources, exposure to pollution or other community issues – that may arise from business operations are appropriately mitigated and managed.

Stakeholder Inclusiveness:

Progressing on the path of ecological sustainability requires collective efforts from multiple stakeholders. In addition to customers, we will address the most material issues for our investors, employees, suppliers, and communities. For each of our stakeholders, we will follow a process of jointly identifying the key issues that are relevant in terms of environmental impacts on and due to them. Given the fact that environmental concerns affect everyone, it is important collaborate in multiple ways. Towards this, we will actively engage in strategic advocacy with industry and civil society networks at regional, national, and global levels.

Transparency:

Newt Global commits to being transparent about its goals and progress on sustainability with all its stakeholders. We believe this is central to our culture of continuous improvement. We will engage with multiple platforms of disclosure in the public domain as well as in response to specific one-on-one requests. We will proactively track and respond to the emerging needs of ESG investors and ensure our disclosures are comprehensive and balanced.

Global standards:

We will constantly benchmark with leading practices from across the world and strive to meet those standards. As part of this, we will actively engage with globally accepted frameworks and calibrate our environmental policies and programs accordingly e.g., on

climate change, we are aligned with Science Based Targets Initiative (SBTi) for our goal setting.

Leadership Commitment:

Newt Global's leadership commits itself to the principles and requirements of being an ecologically sustainable organization by provisioning adequately for the investment of necessary resources, by setting up effective governance processes of planning and review and by stewarding the entire organization to align with our stated vision and goals.

We will drive the implementation of our policy through widespread awareness and concrete actions, while being open to continuous improvement. We believe that the policy serves as a strong foundation for seamless integration of our marketplace, workplace, operations, environment, and community concerns in order to support the larger goals of sustainable development.

Policy Owner: Director Operations

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