

ENVIRONMENTAL POLICY

of usd AG

Author	Andrea Tubach
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Preamble

Corporate social responsibility (CSR) is the social responsibility of companies in terms of sustainable business. The three pillars of sustainability encompass social, ecological and economic aspects, such as fair business practices, employee-oriented HR policy, economical use of natural resources, serious local commitment and protection of the climate and environment. usd is committed to the ten principles of the UN Global Compact for responsible and sustainable corporate governance and to the 2030 Agenda for Sustainable Development adopted by the member states of the United Nations in 2015. At the heart of the agenda are 17 global Sustainable Development Goals. At usd, we have prioritized five of the goals. SDG 13 “Climate action” is therefore one of our focus topics. The following guideline describes the principles and requirements to which the Executive Board, management and employees of usd are committed in this context.

1. General information and principles

1.1 Purpose of the policy

This guideline forms the framework for our environmental management. It describes our goals and initiatives to protect the environment and the climate (focus on SDG 13 “Climate action”) and at the same time defines requirements and our internal organization. Our environmental and climate protection concepts address both our own company and our obligations to external partners. Internally, the content is also intended to serve as a guide for all employees and create a lasting awareness of the issue of environmental protection outside of working life as well.

1.2 Competencies and responsibilities

The Executive Board of usd has overarching responsibility for environmental management and, as part of its strategic corporate planning, also approves the objectives and the associated environmental management measures required. Responsibility for the implementation, content and monitoring of compliance with defined measures has been transferred to the Compliance & Legal organizational unit, represented by Executive Board member Andrea Tubach. Responsibility for the operational implementation of the requirements defined in the environmental management system lies with the divisional management of the respective usd business and central divisions. They are responsible for actively supporting the implementation of measures, writing them down in internal process documentation and, in particular, complying with and driving forward the implementation of the defined measures within their own division. The key performance indicators (KPIs) defined and monitored in this context are transferred once a year to the CSR management system, which is consolidated in the Compliance & Legal organizational unit.

Significant deviations from agreed environmental management targets during the year are also communicated to the Compliance & Legal organizational unit outside of the annual reporting cycle. As part of a structured decision-making process, a decision is made as to whether additional measures or adjustments to the adopted plan will be made during the year, taking into account the severity of the deviation and its impact on stakeholders.

The organizational unit is supported by the internally founded Responsibility Circle, which consists of a community of employees from different divisions who are actively involved in improving the environmental awareness of employees and implementing various approved measures and projects each year.

1.3 Validity and review

This Environmental Policy is valid for all usd locations and their employees. It is reviewed and adjusted annually if one of the following conditions is met:

- Changes to important references and underlying standards.
- New findings on existing and insufficiently addressed environmental aspects.
- Changes in the requirements of relevant stakeholders (e.g. clients, suppliers) that are addressed by the usd Code of Ethics and Conduct.

1.4 Obligation to comply with laws

usd complies with statutory requirements and legal obligations wherever it does business. In addition, we act in accordance with the precautionary principle in our current and future business activities.

2. usd environmental management

2.1 Environmental policy of usd AG

Responsible conduct plays a fundamental role in all divisions of usd - for us, our clients and partners, but also beyond that. "We are among the good guys" is one of the guiding principles of our Code of Ethics. The well-being of future generations and, as a fundamental part of this, environmental protection is therefore an important component of our corporate philosophy.

We are committed to carrying out our activities in harmony with the environment and nature and to making our business activities sustainable for future generations. As part of usd's environmental management, we continuously analyze all aspects of our operations for potential improvements for the benefit of the environment, in line with the profitability of usd.

usd and its employees have set themselves the goal of becoming a climate-friendly organization by

- protecting and maintaining the natural foundations of life,
- fulfilling all binding obligations,
- continuously improving our environmental management and
- anchoring environmental protection as a matter of course in everyone's thoughts and actions.

For many of our clients, environmental awareness is an important factor when selecting contractual partners. We try to meet this requirement and always aim to implement all customer-relevant specifications in the best possible way and, if possible, to exceed them.

As an employer, we rely on our employees taking a high degree of personal responsibility in all matters. This also applies to the divisions of environmental protection. All employees are integrated into our management system and have the right and duty to work towards avoiding unnecessary environmental pollution in their daily work.

2.2 Climate change and energy

Climate protection is one of the central fields of action of the CSR strategy. This is also reflected in the focused goals mentioned in the preamble. SDG 13 requires immediate action to combat climate change. COVID-19 has led to an improvement in digitalization, which will lead to a sustainable reduction in emissions.

2.3 Natural resources and the circular economy

We use the technical and economic possibilities to continuously reduce the environmental impact and consumption of resources. Our use of resources is therefore always based on the aspects of economy, environmental compatibility and recyclability. Together with our partners, we have created solutions for the operation of our sites that regulate the economical use of resources. We see environmental protection as an important management task. Our employees receive annual awareness training on relevant environmental protection topics and are motivated to use resources sparingly. The aim is to continuously integrate a further measure for the environmentally friendly use of resources each year through our reporting and ideas management process and in cooperation with the Responsibility Circle.

2.4 Sustainable products

Sustainability is important to us when selecting the products we buy. We avoid unnecessary packaging and plastics and rely on reusable or compostable materials. We also cover our office supplies in an ecologically responsible manner. We use devices with low energy consumption and use digital signatures wherever possible.

2.5 Supplier standards

We involve our contractual partners in our environmental protection activities, communicate transparently how important environmentally conscious action is to us and therefore also take into account defined environmental aspects in the procurement process. In accordance with our purchasing guidelines, our contractual partners undertake to comply with the usd Code of Ethics and Conduct. New suppliers classified as critical are also obliged to provide more detailed information on their own environmental management efforts via the usd supplier questionnaire. Once a year, usd also asks relevant service providers about the status of their implementation of environmental management.

3. KPIs and transparency

Sustainability KPIs are considered and measured at various levels. usd does not have any production operations. As part of usd's environmental management, we therefore initially focus on relevant processes in the processing of orders and specifically the provision of services to our customers in our core processes. Business trips represent one of the largest items of CO₂ emissions at usd. With this in mind, specific measures have been defined to reduce or offset the resulting CO₂ emissions. From July 1, 2024, CO₂ emissions will be offset at least proportionately for every flight booking, if the airline has the option to do so, by making corresponding additional payments. Domestic flights for business purposes are completely prohibited. The aim is to make use of one of the CO₂ compensation options offered by the respective airline for at least 80% of business air travel. In addition, our employees are instructed to travel to our locations or customer assignments in a climate-friendly manner using public transport or rented electric vehicles wherever possible. We also look at support processes that facilitate our core process but do not generate any direct customer benefits themselves. In this context, the focus is on usd infrastructure, which has the goal of extending the life cycle of IT equipment to the extent that IT equipment is used until it is no longer justifiable from a security point of view or to donate functional old hardware. We consider the third dimension, the measurement of sustainability performance in the upstream and downstream value chain, as part of our purchasing process.

4. Continuous improvement

As part of the annual management review of the management systems implemented at usd (currently: information security management system in accordance with ISO 27001, quality management system in accordance with ISO 9001), a review of the CSR management system has been integrated since 2022, which also includes reporting from the usd environmental management system, among other elements.

In addition, an internal reporting and ideas management process has already been established via the Responsibility Circle, which also enables ad hoc measures to be taken following approval by the Executive Board at its monthly meetings.