

CORPORATE SOCIAL RESPONSIBILITY & ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

POLICY STATEMENT

This policy establishes Sangfroid Group Limited's commitment to responsible business practices that respect human rights, protect the environment, and uphold ethical governance. It aligns with international standards including ISO 26000, UN Guiding Principles on Business and Human Rights, and relevant legal and regulatory requirements.

SCOPE

Applies to:

- All Sangfroid Group operations globally
- Employees, contractors, suppliers, and partners
- All projects and service delivery activities

POLICY COMMITMENTS

Environmental Responsibility

- Minimise environmental impact through efficient resource use and waste reduction.
- Comply with applicable environmental laws and regulations.
- Promote sustainable practices in procurement and operations.

Social Responsibility

- Respect and uphold human rights in all operations.
- Ensure fair labour practices and safe working conditions.
- Engage positively with local communities and stakeholders.
- Zero tolerance for discrimination, harassment, or exploitation.

Governance

- Maintain transparency and accountability in decision-making.
- Implement anti-bribery and anti-corruption measures.
- Ensure compliance with international standards and local laws.
- Regularly review and report on CSR and ESG performance.

IMPLEMENTATION

- Integrate CSR/ESG objectives into business planning and risk management.
- Conduct supplier due diligence and monitoring for ethical compliance.
- Provide training for employees and contractors on CSR/ESG principles.
- Establish measurable targets and track progress annually.

REPORTING & REVIEW

- Annual CSR/ESG report to stakeholders.
- Continuous improvement through corrective actions and stakeholder feedback.



Harry Hayes
Chief Operating Officer
18 November 2025