ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

1. About this Policy

At Xenith IG, we believe that an environmental, social and governance ("**ESG**") strategy generates benefits for us.

Integrating a culture of sustainability into our business model not only helps Xenith IG identify potential risks and grasp opportunities but also satisfies stakeholder demands and establishes a robust corporate management system.

This Policy represents our commitment to integrating environmental, social, and governance considerations into all aspects of our business operations. By upholding these principles, we aim to create long-term value for our stakeholders while contributing to a more sustainable and inclusive future.

2. ESG topics

This section of the Policy serves as a comprehensive overview of the key areas of focus within our ESG strategy. It outlines the specific environmental, social, and governance issues that are integral to our business operations and stakeholder engagement.

Xenith IG has identified the following specific ESG topics that are integral to our business operations as well as our stakeholders:

(a) Employee and Contractor Health and Safety
(b) Service Disruptions
(c) Compliance and Ethics
(d) Diversity, Equity and Inclusion
(e) Employee Engagement
(f) Environmental Impact

Xenith IG may review the ESG topics from time to time to ensure that they remain relevant to our ESG strategy and business.

3. ESG governance

Xenith IG's Executive Team routinely reviews ESG-related matters and develops appropriate actions. The day-to-day responsibility for guiding, implementing, and overseeing ESG initiatives falls upon the General Counsel. Xenith IG's board of directors also review the ESG topics and KPI metrics on a quarterly basis. By fostering communication and discussions across all levels of the organisation, Xenith IG plans to report on relevant ESG Key Performance Indicators ("**KPIs**") for effective monitoring of ESG performance.

4. Strategic Plan and roadmap

4.1. ESG KPI setting, data collection, and monitoring

Xenith IG recognises the importance of setting clear KPIs, implementing robust data collection processes, and continuously monitoring our performance to drive accountability and progress in our ESG efforts.

Xenith IG has identified the following specific KPIs that align with its ESG topics (as set out in paragraph 2 above).

Employee and Contractor Health and Safety	• Number of work related injuries • Number of days lost due to injury
Service Disruptions	• Number of service disruptions • Average customer disruption duration
Compliance and Ethics	• Number of whistleblowing reports • Number of investigations for anti-bribery and corruption/anti-money laundering violations
Diversity, Equity and Inclusion	• Percentage of female employees out of entire organisation • Percentage of female employees in managerial roles
Employee Engagement	• Net Promoter Score
Environmental Impact	• Estimated Greenhouse Gas (GHG) emissions

Xenith IG may review these KPIs from time to time to ensure that they are objective, measurable, relevant and in line with Xenith IG's ESG topics.

We will continuously monitor our performance against these KPIs, identifying areas for improvement and tracking progress over time (which may include, for example, enhancing compliance or safety policies, or exploring ways to reduce GHG emissions over time). This monitoring process will enable us to assess the effectiveness of our ESG initiatives and make informed decisions to drive positive impact.

4.2. Sustainability reporting and disclosure

Xenith IG will report the ESG topics and KPI metrics quarterly to its board of directors and investors. This will foster accountability, build trust, and demonstrate our commitment to sustainability and responsible business practices.

In addition, Xenith IG will also promptly report all material ESG issues (e.g. investigations for anti-bribery and corruption/anti-money laundering violations; or sexual harassment allegations) to its board of directors.

4.3. Stakeholder Management and communication

Xenith IG will actively engage with our stakeholders (including employees, investors, customers and contractors) to understand their expectations and incorporate their feedback into our ESG initiatives.

4.4. Continuous improvement

Xenith IG is committed to ongoing review and refinement of our ESG topics and KPIs, data collection methodologies, and monitoring processes to ensure they remain relevant, effective, and aligned with evolving stakeholder expectations and industry best practices. Through continuous improvement and innovation, we aim to drive positive impact and create long-term value for our stakeholders and the communities in which we operate.

5. Additional guidance

If you have any questions in relation to this Policy, please contact the Legal and Compliance Department at legal@xenithig.com.