Corymbia

Sustainability policy

Corymbia Sustainability Policy	
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Contents

Glossary

ESG (Environmental, Social and Governance)	ESG refers to a broad framework used to evaluate a company's performance beyond financial (and often shorter-term) metrics, measuring direct and indirect inputs and outputs. **Environmental:** this aspect of ESG relates to the impact of a company on the environment, including with regards to issues such as carbon emissions, bio-diversity, resource use & efficiency, and waste management. **Social:** this pillar refers to the company's relationships with its key stakeholders, such as employees, customers, and communities where it operates. It includes topics such as human rights and diversity, equity and inclusion (DEI). **Governance:** this aspect refers to systems, processes and controls a company has in place to operate. It includes topics such as compliance, board process, business ethics, shareholder rights, and cybersecurity.
EU Taxonomy Minimum Safeguards	Compliance requirement put in place in EU Taxonomy Regulations which prevents activities and investments from being regarded as 'sustainable' if they involve breaches of key social principles and human and labour rights, or do not align with minimum standards for responsible business conduct. Companies must ensure their economic activities align with the OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, ILO Fundamental Principles and Rights at Work and the International Bill of Human Rights (all defined later in this glossary).
Greenhouse gas (GHG) protocol	An internationally recognised standard which sets out methodologies for organisations to collect, calculate and report their Greenhouse Gas emissions. Greenhouse gas emissions are assigned to three categories: Scope 1, 2 and 3 emissions – these are defined as per the company's operational boundaries in the 'Sustainability Objectives' section of the document.
International Bill of Human Rights	A comprehensive list of Human Rights, which includes the Universal Declaration of Human Rights, International Covenant on Economic Social and Cultural Rights (ICCPR) and the International Covenant on Civil and Political Rights (ICESCR). Companies can align with the ICCPR and ICESCR by ensuring provision of the rights listed on this webpage.
International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability	The Performance Standards provide guidance for entities making investments on how to identify environmental and social risks and impacts and mitigate them. It contains 8 performance standards which must be aligned with, including Assessment and Management of Environmental and Social Risks and Impacts, Labor and Working Conditions, Resource Efficiency and Pollution Prevention, Community Health, Safety, and Security, Land Acquisition and Involuntary Resettlement, Biodiversity Conservation and Sustainable Management of Living Natural Resources, Indigenous Peoples, and Cultural Heritage. To align, a company must co-operate with its investor(s) to achieve the environmental and social standards set out in the framework.

International Labour Organisation (ILO) Core Conventions	Legally-binding legal instruments drawn up by ILO constituents (governments, employers and workers), that set out basic principles and rights at work. Basic human rights, occupational safety and health, wages, working time, employment policy and promotion, vocational guidance and training, skills development, specific categories of workers, labour administration and inspection, maternity protection and social security, indigenous and tribal people, and migrant workers are all work issues covered in the Core Conventions. Companies can incorporate the principles into their Codes of Conduct or other responsible business conduct initiatives.
Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises	Recommendations addressed by governments to multinational enterprises, which aim to encourage positive contributions enterprises can make to economic, environmental, and social progress, while minimising adverse impacts. The guidelines cover areas such as climate change, biodiversity, business responsibility, human rights, etc. Enterprises can align by focusing on responsible business practices such as setting climate and biodiversity goals, using data and technology responsibly, and having robust anti-corruption measures in place.
Social Impact Assessment (SIA)	A process of research, planning and the management of social change or consequences arising from policies, plans, developments and projects. In this context, it would be framed in the context of the impacts of company operations. It is particularly important for infrastructure projects due to the requirement for extensive stakeholder engagement.
Taskforce on Climate-related Financial Disclosures (TCFD)	Created with the purpose of improving and increasing reporting of climate-related financial information, the TCFD framework sets out a structure for organisations to disclose climate-related risks and opportunities. Companies looking to align should disclose their climate-related governance, strategy, risk management, metrics and targets or make this information available to investors.
United Nations (UN) Global Compact (UNGC)	A global corporate sustainability initiative which calls on companies (among other entities) to align their operations and strategies with the framework's 10 environmental, human rights, labour and anti-corruption principles. Companies can either solely align with the outlined universal sustainability principles, following through with associated actions and reporting, or can go a step further in their commitment by becoming official members.
UN Guiding Principles on Business and Human Rights	The Guiding Principles seek to provide an authoritative global standard for preventing and addressing the risk of adverse human rights impacts linked to business activities. Enterprises should seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services through their business relationships.
UN Sustainable Development Goals (UN SDGs)	The UN SDGs are a call to action for organisations to protect the planet, end poverty and improves the lives and prospects of everyone. There are 17 goals which were adopted by all UN Member States in 2025, and the adopters have a target to achieve the goals by 2030. To align, companies must map relevant SDGs against their own sustainability or ESG strategy.

Sustainability Policy

1. Introduction

Corymbia GmbH ("Corymbia" or the "Company") is an electric vehicle (EV) charging platform active in the installation and management of high powered charging stations for EVs. Corymbia's initial operating company, HPC2 Asset, plans to install up to 400 charging stations on various locations in Germany, including supermarket parking lots. The HPC2 Asset EV chargers are equipped with battery storage and screens for Digital-Out-Of-Home (DOOH) advertisements.

Corymbia is dedicated to embedding sustainability into every aspect of its business. The Company acknowledges its duty to contribute positively to the environment, society, and the economy, aligning with the best-in-class sustainability frameworks, goals and regulations as outlined in section 2.2 of this policy.

The following sustainability policy (the "Policy") sets out the Company's commitment to integrating environmental, social and governance considerations into its operations and the services it offers. The Policy outlines the standards which will be adhered to by all Corymbia staff and will provide guidelines for how sustainability principles will be applied throughout the company's operations. Through implementation of this policy, Corymbia commits to the following:

- **Best practices:** Alignment to globally recognised guidelines promoting corporate governance, human rights, labour rights and environmental and social sustainability practices.
- **Robust sustainability governance:** Implementing processes to ensure materiality, objectives and KPIs are set and monitored for ESG risks and opportunities.
- **Continuous improvement:** That projects aimed to address material ESG risks and opportunities are well defined and executed across the firm.
- **Transparency:** Accountability and transparency through regular communication of ESG information to relevant stakeholders.

This policy applies to all employees, contractors, and stakeholders involved in the Company's operations. It encompasses all business activities, including procurement, production, distribution, installation, operation and end-of-life management of its products and services.

2. Alignment with Best Practice Sustainability Frameworks

This policy and the embedded processes are designed to support the following globally recognized guidelines and policies:

1. International standards related to conducting business responsibly, including upholding human and labour rights:
    a. OECD Guidelines for Multinational Enterprises
    b. UN Guiding Principles on Business and Human Rights
    c. International Labour Organisation (ILO) Core Conventions
    d. International Bill of Human Rights
    e. EU Taxonomy Regulation Minimum Safeguards.
2. General environmental and social sustainability frameworks or standards:
    a. UN Global Compact Principles

b. IFC Performance Standards
c. Sustainable Development Goals (SDGs).
3. International frameworks or standards related to climate:
a. Greenhouse Gas (GHG) Protocol
b. Taskforce on Climate-related Financial Disclosures (TCFD)

3. Sustainability Governance

The Board of Directors is responsible for adopting and overseeing the implementation of this policy and ensuring it aligns with the Company's strategic objectives, frameworks, and regulations. Senior management is responsible for ensuring compliance with relevant directives and reporting progress to the Board, as well as overseeing day-to-day sustainability activities. They work in close tandem with external advisors to ensure adequate processes are in place for target setting, data collection and policy creation related to sustainability. Material sustainability data is collected on an annual basis and stored in an ESG data management platform in order to measure progress and inform target setting.

The Company has created the following Sustainability Programme to ensure that ESG considerations are integrated into decision-making and operational processes.

Table: Sustainability Programme Roles and Responsibilities

Sustainability Programme Phase [E]	Description [E]	Formalized [I]	Responsible Forum Name [E]	Tracking Mechanism [I]	Scope [E]	Responsible Senior Manager [I]	Periodicity [I]	Last Review [I]
Sustainability Policy Review	Formal review and sign-off of contents of the written policy	Y	Board of Directors	Sustainability Policy Document Version Table	Whole Company	Sebastian Tuerk	Annually	
Materiality	Internal and external shareholders inform the identification and prioritization of key E, S and G topics impacting Corymbia	Y	Board of Directors	Sustainability Policy	Whole Company	Audrey Courdouzy	Annually	
Objectives and Plans	Setting measurable ESG objectives and an associated plan for achieving them	Y	Board of Directors	Sustainability Policy	Whole Company	Audrey Courdouzy	Annually	
Risk Management Framework	Structured approach used to identify, assess, manage, and communicate risks and opportunities effectively	Y	Board of Directors	ESG Risk Register	Whole Company	Sebastian Tuerk	Quarterly	
Project and initiative design, execution and monitoring	Projects developed to meet the sustainability objectives	Y	Board of Directors	Sustainability Roadmap	Whole Company	Sebastian Tuerk	Quarterly	
Training, awareness and implementation	Ensuring resourcing for execution and documentation of the Sustainability Programme	Y	Board of Directors	Board minutes	Whole Company	Wessel Schevernels	Quarterly	

[E]: External

[I]: Internal

4. Materiality

Material ESG topics have been identified through the application of the Company's ESG Risk Management Framework, which includes a materiality assessment component. This is refreshed on an annual basis to reflect operational changes. The following diagram demonstrates the granular process for how individual ESG topics are addressed, which is aligned with the Company's **Sustainability Programme**.

All material topics to the Company are covered in the following sections of this Policy, as well as the objectives set. Sustainability progress against the objectives outlined in the Policy is presented on a quarterly basis to the Board of Directors by the Senior Management Team. Senior management aims to align short-term objectives with mid- to long-term goals, and any sustainability-related CAPEX and OPEX items required for implementation of strategy items reflect this alignment and are ultimately approved at board level. Remediation projects are included into the Company's Sustainability roadmap for continuous improvement of performance.

5. Sustainability Objectives

Consistent with the integration of ESG matters into Corymbia's operations, the Company has set the following long-term strategic objectives.

Material ESG Topic	Associated Metrics	Key company Objectives
Energy	Energy use / energy distributed	- Maintain 100% renewable electricity procurement for the charging points - Explore use case for solar PV to support operation of the chargers - Explore the use of Energy Management Systems to actively balance generation, procurement, storage and sales of power
Greenhouse gas emissions	Avoided emissions	- Reach 125 of tonnes of CO_2e avoided per year by 2033
Material sourcing, resource efficiency and end-of-life	Sustainability of all procured materials for company operations	- Develop an end-of-life plan for the hardware, including recycling of the batteries
Community impact	Social impact assessment	- Carry out a social impact assessment before year-end 2026 **- Advertise at least one local charity on the stations' screens by 2027**
Overall sustainability	Yearly EU taxonomy assessment	- Achieve alignment with the EU taxonomy framework by 2026

6. ESG in action

6.1   Environmental

1.   Net zero, Greenhouse gas emissions and Energy

Corymbia contributes to minimising the carbon emissions from the transport sector and associated impacts caused by climate change, by enabling the broader adoption of electric vehicles, as well as supplying electricity generated from renewable sources. The Company is committed to procuring 100% renewable electricity at its charging stations.

Corymbia has conducted a materiality screening and process mapping exercise to determine operational boundaries for GHG emissions monitoring. A market-based method of carbon accounting is used, which is aligned with the GHG protocol methodology for corporates. An inventory of Scope 1 and 2 emissions data is collected on an annual basis and is collated on an ESG data management platform to allow for analysis and progress measurement against this target.

In addition, the battery storage within the hardware reduces the strain on the electrical grid at times of peak demand, therefore reducing the need for fossil energies.

2. <u>Climate risks and opportunities (physical & transition)</u>

As the effects of climate change continue to proliferate, Corymbia recognises the importance of identifying material threats which may affect its operations, financial stability, and long-term sustainability. In its approach to climate-related risks and opportunities, the Company aligns with the TCFD framework.

The Company has conducted a detailed assessment of climate-related risks posed to its operations, and a yearly update is carried out using the Munich Re Risk Intelligence Platform. The following physical risks are assessed, in addition to transition risks:

Acute Physical Risks	Chronic Stressors
Hurricanes, Typhoons, Cyclones, Tornados	Water Stress
Wildfires	Heat Stress
Flooding (River, Flash, Storm Surge)	Sea Level Rise
Storms (Extratropical, Hail, Lightning	Fire Weather Stress
Tsunamis	Drought Stress
Volcanos	Precipitation Stress
Earthquakes	Cold Stress

For both physical and transition climate risks, mitigation and adaptation plans have been put in place as part of the Company's Sustainability Roadmap, including measures implemented to capitalise on climate-related opportunities.

3. <u>Light and noise pollution</u>

Both light and noise pollution generated by the charging stations have the potential to negatively impact community wellbeing. In order to understand the impacts of the operational footprint, Corymbia has commissioned third-party studies to assess light and noise pollution, which also included gathering feedback from local stakeholders to ensure a holistic approach to the issue. As a result of the findings, the improved design of the hardware and its use case allow to minimise light and noise disturbances.

These measures have the ultimate goal of not only improving local community relations but also creating quieter and darker environments that protect biodiversity. Outcomes will be measured through the Company's stakeholder relations activities.

4. <u>Material sourcing, Resource efficiency and End of Life considerations</u>

Material sourcing and Resource efficiency are important ESG considerations for the Company, as they have a direct impact on environmental sustainability (particularly from areas such as our carbon footprint), as well as internally impacting business health and long-term resilience. To assess its impact in this regard, Corymbia works with suppliers to reduce the environmental footprint of the hardware it procures and is developing a clear end-of-life strategy, covering the optimisation of battery longevity and ultimate recycling to reduce resource consumption and carbon emissions.

Corymbia also works closely with its existing suppliers to foster alignment and collaboration with regards to reducing environmental impacts. Alignment on environmental and social objectives are outlined in supplier contracts.

6.2　Social

1.　Labour standards and working conditions

Corymbia is specifically concerned with upholding strong labour standards and healthy working conditions and is aligned with international standards such as the ILO Core Conventions and UN Guiding Principles on Human Rights.

The Company operates with a zero-tolerance policy regarding child labour or forced and compulsory labour in its operations and supply chain. This is upheld through contractual obligations with its suppliers. A confidential Reporting Mechanism has also been set up, which employees and suppliers can use to report any concerns or violations.

For its own employees and direct contractors, Corymbia is committed to:

- **Ensuring fair wages and working hours**: we commit to paying all employees and contractors at least the minimum wage, or the fair living wage, depending on jurisdiction. We also limit work hours to the maximum number per week in line with regulations to ensure workers can retain an adequate work-life balance, and mandate regular breaks and rest periods to prevent fatigue and improve productivity and well-being.
- **Providing employment benefits**: we provide employees with baseline benefits such as paid sick leave, flexible working arrangement when required and vacation days..
- **Promoting safe and healthy work environments**: ensuring that our partners carry out health and safety risk assessments, providing regular training and adequate safety equipment.
- **Guaranteeing freedom of association**: we respect the rights of our employees to join or form unions or similar organisations, the right to collective bargaining and encourage open dialogue between employees and managers.
- **Conducting regular reviews**: at management level, we regularly review the labour practices we uphold to ensure ongoing compliance with the standards set out in our policies, and we regularly seek feedback from employees and contractors regarding where we can improve our processes.

2.　Customer satisfaction

Customer satisfaction is seen as being integral to maintaining socially responsible business practices, building a strong company reputation and ensuring organisational resilience. A number of communication methods have been established, including through customer feedback channels enabled directly on the charging stations, Treview of online feedback platforms and the anonymous Reporting Mechanism. The feedback received through these communication channels enables continued improvement of the services provided.

The following metrics are monitored on a monthly basis:

- Review of customer feedback via Google Review, other reputable online industry forums and charging apps

- Utilisation and availability of the charging stations
- Hotline availability
- Call waiting time
- Average customer calls per station, and per charging session

3. <u>Health and Safety</u>

Upholding rigorous health and safety standards is a necessity to maintain the well-being and security of employees, customers, users and the local communities in areas where Corymbia operate. Health and safety considerations are informed by an initial Health and Safety risk assessment followed by the implementation of mitigation measures where necessary.

Due to the nature of the Company's operations, Corymbia's employees are subject to limited risks. Contractors' health and safety requirements are dictated by contractual clauses, to ensure compliance with health laws and regulations.

Corymbia monitors the following health and safety metrics for employees, contractors, and the local community and collates them on an annual basis:

- Lost time injuries
- Total recordable injuries
- Near miss incidents.

4. <u>Social and Economic Impacts (Stakeholder engagement through Community development, Local employment & associated economic impacts)</u>

In all locations where Corymbia has operational business activities, the Company seeks local stakeholder buy-in first and foremost and strive to improve the local community. Its operations aim to promote positive social and economic impacts and minimise negative externalities through the implementation of its stakeholder engagement strategy.

Corymbia's charging stations promote the inclusive use of electric vehicles, by providing public access to charging points, which in turn contributes to the improvement of overall air quality for the communities.

With regards to the Digital-Out-Of-Home advertisement displayed on the screens, Corymbia is striving to set ethical guidelines within contracts and to prevent any negative impacts by promoting:

- Accuracy and Honesty: Advertisements must not contain false or misleading information. All claims about products or services should be truthful and substantiated.
- Respect and Sensitivity: Advertisements should avoid content that is offensive, discriminatory, or perpetuates harmful stereotypes. This includes refraining from demeaning individuals or groups based on race, gender, religion, or other characteristics.
- Consumer Privacy: Advertisers must respect consumer privacy and ensure that personal data is not misused. Clear disclosure of how consumer information is used is mandatory.
- Promotion of Safe Products: Advertising for products that can cause harm, such as tobacco, alcohol, and gambling, must be carefully regulated, particularly when targeting younger audiences.
- Protection of Vulnerable Groups: Advertisements should not exploit the vulnerabilities of certain groups, such as children or individuals with addictions. Manipulative tactics that take advantage of these groups are prohibited.

- Ethical Practices: Advertisers must avoid practices considered unethical, such as creating artificial scarcity, using fear tactics, or making unsubstantiated health claims.

The following social topics have been identified as focus areas for the Company:

- **Community development:** through our stakeholder engagement strategy, we engage with community members and local government to understand local concerns and how we can address them. Consultations enable us to adapt the way we operate to cater for community needs.
- **Local employment:** Where possible, the Company supports local businesses and suppliers, and it has the aspirational goal of building community support and resilience.

The Company aims to conduct a social impact assessment (SIA), to evaluate the qualitative and quantitative impacts of its operations on the communities it serves in detail.

Following conducting the SIA, mitigation and adaptation plans will be put in place to treat any negative social impacts on the communities the Company operates in. These projects will form key part of social pillar of our Sustainability Roadmap in future.

6.3 Governance

1. Governance Structure

Corymbia strives to uphold ethical business practices, which aim to enable the effective implementation of the environmental and social objectives set out above. This is underpinned by the robust governance structure and processes which enable day-to-day operations, which include the implementation of sustainability-related processes such as risk management, objectives and target setting. The following table demonstrates Management-related governance topic considerations and associated objectives the Company has:

GOVERNANCE-RELATED REQUIREMENTS FOR SENIOR MANAGEMENT	
Sustainability Oversight	- The Board is made up of non-executive directors to ensure an adequate level of expertise and unbiased oversight is present, with minimal risks of conflicts of interest arising. - The Board collaborates closely with the senior management team and external sustainability experts to ensure effective management of the business and its sustainability objectives. - The Board has sustainability expertise and is updated on sustainability matters at least quarterly. It ensures alignment of sustainability objectives with overall business objectives.
Executive Compensation	- The Compensation Framework in place is closely aligned with ESG risk management and sustainability objectives to ensure business success also results in sustainability progress. This is done through linking ESG KPIs to fixed and variable financial compensation.
Delegating Authority	- The Board ensures that responsibility and accountability for ESG is shared up and down the organisation (refer to the Sustainability Governance section of this policy for more information). They are responsible for promoting awareness of the importance of sustainability for the business and guide the

implementation of the company's ESG Risk Management Framework across its value chain.

2. Cybersecurity and Data Protection & Privacy

In an increasingly digitised world, led by the proliferation of mobile and Internet-of-Things (IoT) enabled devices, cloud computing, artificial intelligence (AI) and data sharing, cybersecurity and data protection are critical issues for Corymbia to ensure privacy, security, trust, and ultimately business resilience.

The Company has conducted an initial audit into the current cybersecurity and data protection infrastructure, incident response processes it has in place, as well as its compliance with relevant standards such as GDPR.

Through its cybersecurity and data protection software, the company monitors the number of cybersecurity threat incidents and data breaches which occur on an annual basis.

3. Anti Bribery and Money Laudering, Corruption and Fraud

Corymbia operates with a zero-tolerance policy regarding bribery, money laundering, corruption and fraud in its operations and supply chain.

The Company's risk management system includes the following actions to reduce the risk of bribery, money laundering, corruption and fraud:

- Compliance with local and international anti-bribery and corruption laws.
- Board members are required to undergo anti-corruption training during onboarding and refresher courses on a regular basis in order to encourage ethical behaviour.
- Implementation of a confidential Whistleblowing and Reporting Mechanism.
- KYC and Due Diligence checklists have been implemented for all new clients, suppliers and third-party partners.
- Internal controls such as duty segregation (separating financial roles to avoid one person with complete control over transactions), approval processes for transactions.

4. Conflicts of Interest

The Global Reporting Initiative (GRI) defines Conflicts of Interest as a "situation where an individual is confronted with choosing between the requirements of their function in the organization and their other personal or professional interests or responsibilities". Corymbia firmly believes that instances of conflicts of interest are detrimental to the equitable running of the company, and therefore, strive to ensure that any such instances are prevented and mitigated.

As such, procedures and accountability mechanisms have been established and will be followed where practicable to ensure standards are upheld throughout Corymbia's activities against instances of conflicts of interest.

Employees which suspect any misconduct related to this matter should raise their concern and can use the Reporting Mechanism.

5. Lobbying activities and Political Contributions

Corymbia ensures that any engagement with lobbying groups is aligned with its climate change and other sustainability commitments and with those of its shareholders.

The Company prohibits any monetary and non-monetary political contributions being made, including those made through third parties.

6. Shareholder Rights

Corymbia aims to align with its investors in its pursuit of long-term value creation. The Company aims to demonstrate accountability and transparency to its investors through the following measures:

- **Transparent communication**: the Company commits to regular financial reporting (i.e. full results yearly, with trading updates quarterly), as well as Meetings as requested.
- **Conflicts of Interest**: the Company ensures that any major conflicts of interest concerning senior management are disclosed to investors.
- **Feedback Mechanisms**: the Company has a feedback mechanism in place where feedback and disputes can be submitted by shareholders.

7. Whistleblower Protection

Whistleblower protection is seen as fundamental right for all stakeholders, including employees, as it allows to report unethical or illegal activities without fear of retaliation, thereby promoting transparency and ethical behaviour within the organisation.

The Company plans to develop a grievance mechanism, available to all stakeholders via its website. The mechanism complies with local and national regulations, such as the EU Whistleblower Protection Directive, and comprises a secure reporting channel and a mechanism for follow-up.

Designated personnel will be assigned, who will provide impartial communication and feedback, as well as providing guidance and facilitating external reporting procedures where necessary.