

# SUSTAINABILITY POLICY

## INTRODUCTION

Soprano Design Pty Ltd and its subsidiaries ("Soprano") acknowledge the global scale of sustainability challenges that society faces from the depletion and inequitable distribution of natural resources, pollution, security of water and energy, waste disposal and abuse of human rights. As a leading Communications as a Service provider ("CPaaS") headquartered in Australia with a global presence, Soprano is committed to striving for sustainable business practice strategies and standards that incorporate and balance environmental, social and governance considerations in our business operations and supply chain to help combat these challenges. We commit to creating sustainable strategies to use natural resources responsibly, applying good management practices to Soprano's use of resources in its operations and minimising our impact on the global environment. We strive to treat people fairly in our business and our upstream and downstream markets and to meaningfully monitor our performance in meeting these objectives. We believe these standards and strategies will contribute to our long-term business growth, financial success, our staff and customer engagement and wellbeing, our business reputation and how we maintain a sustainable and safe workplace environment.

## PURPOSE

The commitment of Soprano's leadership to address sustainability challenges is a core tenant in driving our environmental, social responsibility, and governance and legal initiatives to ultimately improve the quality of people's lives. This commitment is reflected in setting strategic goals for reducing our business operation and supply chain environmental footprint, conserving and sourcing renewable resources in our operations, and championing ethical human rights practices. Soprano's leaders commit to foster a culture of sustainability throughout our global group operations aligned to these goals and apply best practice risk management principles. Our purpose is to operate with an ethical, environmentally and socially acceptable governance model in conducting our business.

## ENVIRONMENTAL RESPONSIBILITY

Soprano is implementing sustainable practices across its business and supply chain, including by adopting energy efficient technologies, renewable energy, sourcing materials sustainably, waste minimisation and recycling. We strive to reduce our environmental and carbon footprint, conserve resources, and save money through energy-efficient operations and waste reduction, including in our office premises and other operational premises. To that end we source from global suppliers with strong environmental sustainability credentials such as Amazon Web Services for its sustainability commitments with its global infrastructure hosting and Dell for its use of sustainable materials in its laptops.

## SUPPLY CHAIN MANAGEMENT

Our supply chain is an integral part of our business operations, and managing the supply chain has a significant impact on achieving our sustainability goals. Soprano's Code of Conduct and our supply chain provider selection is premised on ethical and responsible sourcing of providers.

Soprano has an internal approval process which requires cross-departmental review and approvals including in-house legal review of all supplier contracts, before being signed off by delegated authority signatories. We rely on our large global supplier published environmental, sustainability and ethical credentials (for example, Dell for supplying laptops, AWS for hosting infrastructure).

Our supply chain management policy helps to ensure that our business operates in a responsible and sustainable manner, from the sourcing of materials for equipment, initiatives like reducing carbon emissions, promoting responsible labour practices, conserving natural resources, and ethical provision of services. This community alignment collectively works to reduce our environmental impact and fosters social and ethical practices and responsibility. The supply chain is also monitored in the supplier renewal approval process, so we can take action when necessary.

## SOCIAL RESPONSIBILITY

Soprano encourages different ideas and perspectives and strives to provide its employees with a positive work environment and work culture. We value diversity and promote equal opportunities for all employees, fostering an inclusive work culture. The company actively engages in team

building experiences, hosts regular social events that include celebrations of significant events from the diverse and different cultures and nationalities of our employees. Soprano complies with Modern Slavery legislation reporting requirements in the UK and Australia for our global operations. By promoting these values in the workplace, including promoting a healthy and safe workplace in all our global business operations, we aim to appeal to a diverse customer base and pool of employee talent. Soprano will actively seek participation from all employees, customers and suppliers for ideas and feedback whenever possible in the development and implementation of our sustainability efforts. To facilitate engagement across the organisation on sustainability issues, Soprano has a dedicated address [sustainability@sopranodesign.com](mailto:sustainability@sopranodesign.com) where employees can raise suggestions about sustainability actions and initiatives. These suggestions are made available to Soprano's executive management team and the Audit and Risk Committee.

## GOVERNANCE RESPONSIBILITY

Soprano strives to foster a positive influence of operating with integrity and responsible business practices as a shared responsibility. We demonstrate a strong commitment to corporate governance, including by our comprehensive Code of Conduct with its set of values and ethical principles that is applicable globally in our operations. ([https://www.sopranodesign.com/wp-content/uploads/2023/06/Code-of-Conduct\\_2023.pdf](https://www.sopranodesign.com/wp-content/uploads/2023/06/Code-of-Conduct_2023.pdf)). Soprano has a Whistleblower policy that encourages any employee, customer or supply chain provider to report concerns or violations of the Code or our ethics or business practices without fear of retaliation, including by making an anonymous report. By maintaining transparency and accountability with key stakeholders, customers and our supply chain, Soprano implements our guidelines for ethical behaviour and ensure compliance with regulatory requirements by regularly assessing the company's sustainability performance. By implementing these corporate governance policies, we strive to ensure that our employees, customers and supply chain act with integrity, transparency, and accountability.

## LEGAL, SECURITY AND FINANCIAL GOVERNANCE

Soprano's Code of Conduct governing our business practices requires compliance with all applicable laws in the jurisdictions in which we operate globally. Such compliance includes workplace health and safety regulations, employee and customer relations protections, data

protection security for staff, customers and our supply chain, and ethical business practices including anti-bribery and corruption policies, and modern slavery reporting commitments.

Soprano have an in-house legal team of qualified lawyers who provide dedicated support for our CPaaS and AI services and their associated marketing, sales, professional services and support services operations. As we have global operations, we have adopted the higher level of legal compliance required for Privacy by using GDPR as our Privacy baseline for our global operations, for example.

As a CPaaS provider we manage security risks and vulnerabilities in alignment with internationally accredited security frameworks, ensuring that such risks are managed appropriately and in accordance with best practices. Our common ISMS backbone supporting our global operations is ISO 27001:2022 and UK Cyber Essentials Plus certified.

We comply with relevant accounting standards for our global operations. The treasury function in our Finance team strives to meaningfully assess and cost the environmental risk and impact of our operations to enable the outcomes of this policy. Our suppliers have their independent costings of such environmental risk and impact that is passed onto us to incorporate into our business operations, and as our operations are delivered remotely and online as a CPaaS provider, our major infrastructure is all hosted by large suppliers such as Amazon Web Services. Accordingly, we price in the largest environmental risk and impact to our operations by sourcing sustainable global suppliers, and actively seeking to digitise and conduct more of our operations online.

## AMENDMENTS TO THIS POLICY

Our sustainability journey will continue as we monitor and improve our progress against sustainability initiatives and strategies, and adapt as required to meet best practice standards in our industry.

Approved by the Soprano Board: 30 January 2025



VERSION CONTROL AND REVIEW			
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