

## **Environmental, Social, and Governance Policy (ESG)**

### **Alpha Capital Partners Group Company Limited**

Alpha Capital Partners Group Company Limited (the “**Company**”) and its subsidiaries operate their businesses in accordance with the principles of good corporate governance, transparency, and accountability. The Company strives to achieve a balance between business development and the economy, society and the environment. The Company and its subsidiaries are committed to being a good role model for society in sustainability and to managing their businesses to achieve strong growth and social recognition based on ethics and the principles of good corporate governance. The Company aims to efficiently generate returns for its shareholders taking into consideration the impact of its business operations on stakeholders of the Company and its subsidiaries. The Company hereby issues the following Environmental, Social, and Governance Policy (“**ESG Policy**”) to provide guidelines on various aspects of business operations for the Company and its subsidiaries.

#### **1. Business operations based on integrity**

The Company and its subsidiaries incorporate guidelines on treatment for stakeholders in the Code of Conduct to include responsibilities towards all stakeholders, including shareholders, employees, customers, business partners, contractual parties, communities, society, and the environment. The Company and its subsidiaries also promote fair competition and avoid transactions that could give rise to possible conflicts of interest and the infringement of intellectual property. The Company and its subsidiaries promote anti-corruption efforts to combat all forms of corruption. Details are as follows:

##### **(1) Corporate governance**

The Company and its subsidiaries are committed to conducting their businesses in good faith, with integrity, transparency, and accountability and to making disclosures of material information. The principles of good corporate governance are adopted and adhered to as guidelines on business operations of the Company and its subsidiaries, taking into consideration the interests of and impact on shareholders, customers, business partners, employees, and all stakeholders. Sharing of interests shall be appropriate and fair.

##### **(2) Social responsibility**

The Company and its subsidiaries adhere to the ESG Policy, which is based on the principle of ethics and fair treatment for all interested parties with the aim of achieving successful business operations in terms of the environment, social and governance, which in turn will lead to sustainable success for the businesses.

##### **(3) Compliance with the law, rules, and regulations**

The Company and its subsidiaries recognize the importance of compliance with the law, rules and regulations relating to the environment, occupational health and safety, and with the code of

business ethics. Directors, executives, and employees are required to comply with the law, rules, and regulations, and shall refrain from being involved in, assisting or committing any act that contravenes the law, rules and regulations.

(4) Compliance with the law on intellectual property

The Company and its subsidiaries do not support transactions which infringe on intellectual property. Directors, executives, and employees are required to comply with the law, rules, and regulations, and shall refrain from being involved in, assisting in or committing any act that contravenes the law, rules and regulations relating to intellectual property.

(5) Efficient use of resources

The Company and its subsidiaries encourage directors, executives, and all levels of employees within the organization to efficiently use resources for maximum benefits. There will be provision for communication with, education and promotion of awareness for employees and all relevant parties in relation to resources management for maximized benefits of the organization.

**2. Anti-corruption**

The Company and its subsidiaries put in place an Anti-corruption Policy with focus on promoting a corporate culture where all levels of personnel are aware of the harmful effects of corruption, and on creating the right values and building trust for all stakeholders. The Company and its subsidiaries adopt specific guidelines on anti-corruption to ensure that the anti-corruption measures are effective.

**3. Respect for human rights**

The Company and its subsidiaries adhere to the policy of promoting and respecting human rights by treating all stakeholders, including employees, the neighboring community and society with respect for human dignity, equality, and freedom. There shall be no violation of fundamental rights or discrimination based on race, nationality, religion, language, ethnicity, color, gender, age, educational background, physical condition, or social status. The Company and its subsidiaries will ensure that the businesses are not involved in the violation of human rights, either directly or indirectly. This shall include the use of child labor and forced labor.

**4. Fair treatment for the labor force**

The Company and its subsidiaries recognize the importance of human capital development and fair treatment for employees because this is something which can contribute added value to the business and the enhanced competitiveness and sustainable growth of the Company and its subsidiaries in the future. The Company and its subsidiaries also recognize the importance of respect for the rights of employees based on human rights and compliance with labor protection law. Employment of the labor force and conditions of employment shall be fair. This includes fair remunerations for employees that

are commensurate with the experience of relevant employees. The performance assessment shall also be fair. Appropriate welfare benefits shall be provided to employees.

The Company and its subsidiaries promote human capital development for all levels of personnel by providing academic training to develop knowledge, capability, and potential of personnel, and to instill positive attitude, morality, and ethics, including teamwork. The Company and its subsidiaries encourage a positive working environment where workers have respect for each other and all levels of employees are treated with fairness.

In addition, employees are provided with an opportunity to express their opinions or lodge complaints regarding any unfair treatment or malpractice within the Company and its subsidiaries. Relevant whistleblowers will have the necessary protection. Safety, occupational health and working environment are taken into consideration, with safety being given priority.

#### **5. Responsibilities for customers and consumers**

The Company and its subsidiaries operate businesses by taking the principles of good corporate governance into consideration which leads to sustainable growth of the Company and to ensure the greatest satisfaction for customers and consumers who will be provided with accurate and sufficient information on services. Customers' demands are met with efficiency and on a timely basis. Systems and channels are put in place to allow customers to lodge any complaints conveniently and effectively regarding services.

In addition, the Company and its subsidiaries will treat all customers with fairness without discrimination. Confidentiality of customers shall be protected. Customers' satisfaction and trust are created using safe and appropriate technology.

#### **6. Preservation of environment**

The Company recognizes the importance of environmental management. The Company operates and controls the operation of the Company and its subsidiaries strictly in compliance with the laws related to environmental protection with the purpose of maintaining and avoid damaging the environment and providing environment protection system, both set as a guideline and as a tool for business operation. In this regard, the Company set the guidelines for the Company and its subsidiaries as follows:

- (6.1) Prescribe energy conservation and management as a part of the Company's operation;
- (6.2) Require personnel at all levels of the Company to focus on controlling the amount of indirect greenhouse gas emissions from energy usage within the organization, by reducing the use of energy that may cause heat and steam, such as air conditioning, vehicle transportation, etc.;

- (6.3) Include risks assessment and impact in matters related to the environment, health, and safety prior to any investment or joint venture, in which the Company operates under the concept of caring and preserving the environment.;
- (6.4) Include guidelines for efficient use of natural resources, material, or equipment;
- (6.5) Include measures to conserve natural resources, such as reducing energy consumption, compliance with 3R Policy (Reduce, Reuse/Recycle, Replenish), etc.

**7. Participation in community or social development**

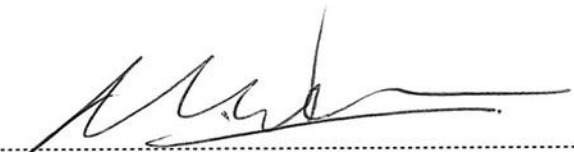
The Company is aware of the community and society responsibilities; therefore, the Company sets a policy to assist and develop the society as follows:

- (7.1) The Company has a policy to support and provide assistance that is suitable for the society and community;
- (7.2) The Company recognizes the importance of responding to events that affect the community, society, and environment due to the Company's operations with speed and efficiency;
- (7.3) The Company encourages its employees to be aware of and responsible for environment and society.

**8. Innovations and dissemination of innovations from operations based on corporate social responsibility and responsibilities towards the environment and stakeholders**

The Company and its subsidiaries will promote creation of innovations at organizational and inter-organizational level. Innovation for this purpose means the creation of things using new methods and may also mean change of ideas or improvement to work procedures for added value of the business. The objective of an innovation is to cause a positive change for the better and to maximize benefits for society.

The Board of Directors considered and approved this Environmental, Social, and Governance Policy in the Board of Directors' meeting No. 7/2022, which was held on 4 November 2022. The policy shall come into force as from 4 November 2022.



(Mr. Christopher Michael Nacson)  
Chairman of the Board of Directors  
Alpha Capital Partners Group Company Limited