

# Environmental, Social & Governance (ESG) Policy

BC FINANCE UAB

## Introduction

At NinjasPay, we are committed to environmental protection and sustainable development. We are dedicated to reducing our environmental impact. This policy outlines our commitment to environmental protection and obligations under current environmental legislation and codes of practice.

## Environmental Policy Statement

- **Comply with Environmental Legislation:**  
NinjasPay complies with all relevant environmental legislation and codes of practice to prevent pollution and actively embraces the spirit of environmental protection.
- **Reduce Waste Generation:**  
We aim to eliminate waste generation and reuse or recycle as much as possible.
- **Minimise Energy and Water Usage:**  
We focus on minimising energy and water usage in our buildings to conserve supplies and reduce natural resource consumption.
- **Encourage Remote Working:**  
We encourage staff to work from home wherever feasible.
- **Encourage Sustainable Transport:**  
We encourage cycling, public footpaths, and e-mobility solutions.
- **Apply Continuous Improvement Principles:**  
We prefer continuous improvement regarding air, water, noise, and light pollution from our premises and reduce any impacts from our operations on the environment and local community.
- **Encourage Energy-Efficient Behaviour:**  
We promote energy conservation by encouraging energy-efficient behaviour and abiding by the same.
- **Sustainable Purchasing:**  
We prioritise purchasing products and services to minimise environmental damage and assess the environmental impact of any business changes in advance.

## Social Considerations

Social considerations are an integral part of our ESG policy statement. They address the impact of a company's operations and activities on various social aspects, including human rights, labour rights, diversity, and community engagement. Companies that prioritise social considerations in their ESG policy statement demonstrate a commitment to responsible and sustainable business practices that promote the well-being of stakeholders and contribute to a better future for all.

Below are some critical social considerations that are included in NinjasPay ESG policy statement:

- **Human Rights:**  
We respect the human rights of our employees, contractors, and other stakeholders. It includes the right to fair treatment, safe working conditions, and freedom from discrimination and harassment. We ensure that the supply chain practices do not contribute to human rights violations.
- **Labour Rights:**  
We adhere to fair labour practices and treat workers with respect and dignity. It includes complying with local laws and regulations regarding wages, working hours, and other employment terms. We also work dedicatedly to prevent forced labour, human trafficking, and other forms of exploitation in their supply chain.
- **Diversity and Inclusion:**  
We stress fostering a workplace culture that values diversity and promotes inclusiveness. It includes recruiting and retaining a diverse workforce, creating a welcoming and inclusive work environment, and ensuring equal opportunities for all employees.
- **Community Engagement:**  
We are inclined to be active members of the concerned communities and engage in meaningful dialogue with stakeholders. It includes contributing to local initiatives, supporting community development programs, and working to minimise the environmental impact of their operations.
- **Environmental Sustainability:**  
We prioritise environmental sustainability in our operations and activities. It includes reducing greenhouse gas emissions, conserving energy and resources, and implementing sustainable practices in the supply chain. We prefer working to minimise our impact on the natural environment and support initiatives to mitigate climate change.

## **Environmental Management**

- **Staff Awareness:**  
We ensure that all employees understand our environmental policy and contribute to achieving the high standard benchmarks.
- **Complaints Investigation:**  
We promptly investigate any complaints concerning environmental policy breaches.
- **Policy Communication:**  
We focus on communicating this policy and making it available to the public, our clients, and stakeholders.
- **Annual Review:**  
We review our environmental policy annually with staff and stakeholders.
- **Sustainable Purchasing:**  
We favour purchasing options that reduce greenhouse gas emissions, use renewable energy, reduce pollution, conserve water, minimise transportation, and serve several related functions.

## **Management Responsibilities**

- **Management Commitment:**  
The management commits to this policy and ensures its implementation throughout the business applications.
- **Provision for Environmental Protection:**  
Adequate provisions are made for the planning, organising, monitoring, and reviewing of the environmental protection arrangements.
- **Employee Awareness:**  
Systems and procedures are listed to ensure employees understand and implement the environmental policy and their responsibilities.
- **Employee Responsibilities:**  
The responsibilities include capabilities, qualities, and time when delegating tasks and activities.
- **Financial and Resource Provision:**  
Budgets for finance and resources are appropriately made available for environmental protection.
- **Incident Investigation:**  
Any incidents causing environmental harm are effectively investigated, and appropriate actions are taken within a reasonable timeframe.
- **Employee Reporting:**  
Employees must report the incidents causing environmental harm for investigation and action within a reasonable timeframe.
- **Employee Feedback:**  
Employees are encouraged to suggest improvements to the environmental policy and practices to the Chief Executive.
- **Continuous Improvement:**  
We prioritise improving the sustainable management of our buildings, estates, and transport, reducing air pollutants and greenhouse gases, and ensuring all staff know our environmental standards and shared responsibilities.

## Scope

This policy will be reviewed annually for revisions if required. We promise transparency to our shareholders, investors, and other essential stakeholders by reporting our ESG policies and updates on the website annually.

In conclusion, the ESG Policy for NinjasPay is a comprehensive framework that outlines our commitment to environmental protection, social responsibility, and good governance. We strive to continuously improve our sustainable management practices, reduce our carbon footprint, and promote environmentally friendly products and services. This policy will help us achieve our goals and contribute to a better future for our planet.