

CSR POLICY

- January 2020 -



OUR GREENFISH POLICY

Everything you need to know

At Greenfish, we believe in a fully sustainable and profitable future. Growing rapidly, we are showing that success and profitability goes hand in hand with sustainability. With more than 200 of us across Europe, we provide sustainable consulting services and smart greentech solutions to organisations caring about the future. As a leader of opinion, we continuously innovate ourselves and create knowledge in the sustainable sector by setting up synergies between our consultants and our clients.

As the Positive Impact Company, we are committed to sustainable development through our three core values:



TRANSPARENCY

Believing in honest and transparent relationships with our stakeholders



COMMITMENT

Assisting our clients to achieve their sustainable business objectives through our range of services and areentech solutions



RESPONSIBILITY

Striving to positively impact our environment and minimize our human impact on the planet by carefully choosing our daily actions

These are translated into our two service lines:

- ▶TECHNICAL ADVISORY provides you engineering support and know-how on the following competences: QHSE Management, Energy Transition, and Operational Performance.
- ▶ STRATEGIC ADVISORY targets strategic projects, evaluates your needs and provides expert advice on CSR & Sustainability, Energy Transition, Environmental Intelligence, Mobility, and Change Management.

Both service lines are supported by our Marketing & Communication Intelligence team, concentrating on knowledge creation and management.

Last year, our "Scale" program supported us in growing our network and further improving the positive impact we have on businesses. In that context, we fully embraced our ecosystem into our day-to-day activity and have been accepted as a participant of the UN Global Compact, which highlights our continuous commitment to further develop our sustainable business conduct.

This year, our "Unify" program will reinforce our commitment to conduct business and pursuing our goals in an innovative and unified way, across all of our locations. We do this in keeping with our mission, vision and values as a one global company. This will strategically strenghten our positive and sustainable impact on society, as well as foster value creation for all our stakeholders.

Not only current opportunities, but also the technologies of the future to solve environmental issues make me optimistic. Today's awareness about climate change convinced businesses to take into account sustainability into their long-term business strategies.

As the Chief Executive Officer of Greenfish, I am resolute to maintain the leadership and provide the resources to make sure that this policy is fully endorsed by our company. Finally, I would like to invite all our stakeholders to join us on the journey to sustainable growth for the future.

Thank you,

Nassim Daoudi Chief Executive Officer



Brussels, January 31st, 2020



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1. CORPORATE SOCIAL RESPONSIBILITY POLICY OF GREENFISH

This policy is to communicate our philosophy and commitment towards the principles and practice of corporate social responsibility and sustainability. It sets out our guideline from which we derive social and environmental relevant programs for sustainable development and set out clear and uniformed standards for ensuring that all business operations are carried out in an ethical manner besides assuring compliance to (inter)national law and regulations.

Through our core values, it ensures a governance structure that guarantees equal, compliant and transparent operations and service while fostering, at the same time, a company culture which enables employees to make ethical, safe and sustainable decisions.

By continuously seeking for opportunities to minimise our environmental footprint and by assuring the quality of our services through educating our employees. Also, it is important to align with the latest trends and innovations, which as a result, will provice a healthy and safe environment.

2. BACKGROUND

OUR VISION

Conscious of the human impact on our planet, we believe in a fully sustainable and profitable future.

OUR MISSION

We provide sustainable consulting services and smart green tech solutions to organisations caring about their future and willing to remain competitive. We constantly position our consultants and client's needs at the heart of our business while actively looking for the latest innovations and trends in sustainability.

Therefore, we established five pillars around which to implement our CSR Strategy for 2019 (figure 2). As CSR & Sustainability are intrinsically linked to our core business, we have established ourselves as an opinion leader in these topics which ensures us to walk the talk. By doing so, our day-to-day business activities will create both short- and long-term value for society as well as external and internal benefits. All this will set the ground for our CSR & Sustainability service line, in which we can further accelerate creating a positive impact.

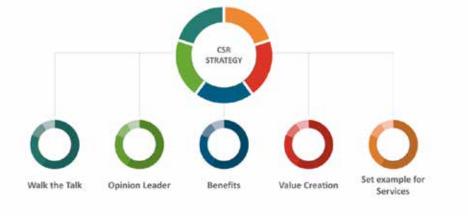


Figure 1: CSR strategy mission



OUR VALUES

As the Positive Impact Company, we are committed to sustainable development through our core values:



TRANSPARENCY

Believing in honest and transparent relationships with our stakeholders



COMMITMENT

Assisting our clients to achieve their sustainable business objectives through our range of services and greentech solutions



RESPONSIBILITY

Striving to positively impact our environment and minimize our human impact on the planet by carefully choosing our daily actions

Figure 2: Core Values Greenfish

3. GOVERNANCE STRUCTURE

To ensure that our CSR Policy and our values are implemented and monitored effectively, Greenfish has set up the following governance structures.

3.1 Greenfish Steering Committee

The Greenfish Steering Committee is responsible for the monitoring of all CSR actions and approves all budgets. Also, the Steering Committee oversees the final approval of the set objectives, the strategy and further development of the CSR & Sustainability Committee.

3.2 CSR Manager

The CSR Manager is responsible for allocating budget, implementation of the CSR Policy, monitors the progress on a continuous basis and reports once a year through a CSR Report.

3.3 CSR Officer

The role of the CSR Officer is to support the CSR Manager.

3.4 CSR Referees

The CSR Referees are employees engaged in a specific CSR topic. Their input and feedback are needed while setting up objectives and when implementing the programs and projects as a result of the CSR Policy. Greenfish has defined the following referees:

- ► Referee Environment
- ▶ Referee Business Ethics
- ▶ Referee Human Capital
- ► Referee Legal

3.5 CSR & Sustainability Committee

The CSR & Sustainability Committee's goal is to ensure implementation of the CSR Policy and to drive for new initiatives. The committee is composed of the CSR Manager, CSR Officer, and CSR Referees aiming to provide strategy, goals, objectives, actions and KPI's which will result in CSR programs and projects.

3.6 Solidarity Projects Committee

The Solidarity Projects Committee implements the solidarity initiative in line with our Greenfish vision to optimise our added value through financial funding and professional volunteering. It is the committee's goal to assure that philanthropic funding is based on a set guideline and prerequisites. Also, the committee will follow up on the funding and the progress of the projects.





Figure 3: Overview Governance Structure CSR

4. ECOLOGICAL, SOCIAL, AND ECONOMIC SYSTEMS

To ensure that our CSR Policy and our values are implemented and monitored effectively, Greenfish has set up the following governance structures.

4.1 Triple Bottom Line

Greenfish is aware it has an environmental, social, and economical impact. Therefore, the triple bottom line is driving our day-to-day decision-making to reduce our impact and to seek improvements, or even new ways of working.

Although, as this concept is being discussed today in terms of need of improvement, it remains a good basis to set up a sustainable business strategy around. Therefore, we are committed to go beyond the traditional accounting framework and integrate the environmental and social impacts into our business, often referred to as the three P's: people, planet, and profit (Elkington, 1990).

4.2 A step further

Greenfish is based on the interdependence of ecological, social and economic systems. This involves maximising performance within the given preconditions. This means that Greenfish strives for sustainable development that meets the needs of the present without compromising the ability of future generations to meet their own needs (WCED, 1987). Greenfish includes the concept of prosperity in its business activities, guided by the Sustainable Development Goals (United Nations, 2015). A visualisation is shown below in figure 4.

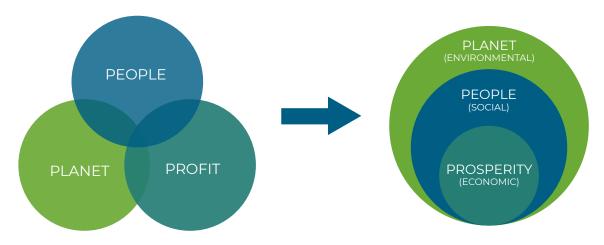


Figure 4: From the triple bottom line to maximising performance within boundaries. Source: Elkington, (1990) and Senge, (2010)



5. A RESPONSIBILITY TOWARDS THE ENVIRONMENT

Greenfish's first core value emphasises its responsibility to reduce its impact on the environment. As an overall aim, it implies to continually improve environmental performance through specific objectives and actions.

As a result, the company strives to reduce its Greenhouse Gas emissions (GHGs) related to office space, transportation and other activities. Setting up science-based targets and compensating through offsetting for unavoidable emissions must support the company to fulfil its commitments towards the environment.

In addition, waste management will be further improved to reduce waste creation, thus pollution, by minimising resource use. This will be supported by a set of incentives that encourage the adoption of low impact attitudes. The employees will be informed and educated regarding the environmental effects of their activities and encouraged to read and comment on the environmental policy.

To further increase the company's positive impact, stakeholders will have to commit to criteria, which supports reducing Greenfish's impact on its eco-system. As part of our spirit to work together through collaboration, active involvement of co-workers is of essence to the success of the company's approach. A special attention will be given through several incentives, partnerships, and a clear communication towards all stakeholders

6. A COMMITMENT TO SOCIETY

As Greenfish's second core value indicates the company commits to society, it implies a fundamental need to create a corporate culture that ensures and promotes Human Rights both internally and externally across its stakeholders.

Therefore, Greenfish aims to apply all principles of the International Human Rights Charter and the fundamental conventions of the International Labour Organisation (ILO) as well as comply to the General Data Protection Regulation (GDPR). As a committed equal opportunity employer, the company will abide by all fair labour practices and ensure that our activities do not directly or indirectly violate human rights in any country (e.g. forced labour).

Pursuing its commitment to the society, the company strives to offer a safe and healthy work environment, producing an atmosphere of well-being that allows colleagues to exercise their responsibilities in a professional manner and evolve in the best possible way. Thus, Greenfish is committed to qualitatively shrinking working hour standards to allow all colleagues to combine their professional life and their private life. Moreover, the company commits to accompany each colleague in their personal and professional development. Furthermore, Greenfish complies with standards and regulations of countries and communities within which it intervenes.

In addition, the Greenfish mindset is based on collaboration, which is one of our values. This state of mind requires tolerance and mutual respect between the different colleagues and teams that are shaped as these various projects unfold. This respect is related to the freedom of faith and personal convictions. It requires openness, honesty and integrity. In this context, any discrimination of any sort will not be tolerated. The company specifically emphasises its



willingness to implement a fair and equal remuneration, eliminating any gender wage gap within the workforce. Thus, all colleagues will be payed fairly by assessing their work on an equal basis.

In the same spirit, an equivalent amount of benefits will be offered to colleagues from different offices. The group will strive to harmonise benefit packages at all offices, taking the different laws and regulations of each country into account. By doing so, the company commits to promote equality of opportunity and the value of diversity and inclusion across our workforce.

7. TRANSPARENCY IN OUR BUSINESS ETHICS

Emphasised by its last core value, Greenfish's commitment to ethical business behaviour is characterised by its transparency in all its operations and activities while being at the heart of its relationships with all its stakeholders.

Greenfish intends to first guarantee obedience to the laws and rules of the countries within which its branches operate. Also, it aims to equally guarantee the monitoring and application of these guiding principles of integrity, equity, reliability, and transparency that constitute the ethics of our corporate conduct and that of our colleagues.

On the one hand, regarding its organisational governance and beyond legal requirements and accounting standards of each country of business, Greenfish will prove, by its actions, its commitment to the fight against corruption and its willingness to be transparent with regards to its financial transactions. Greenfish will stand ready to provide its clients or any other interested stakeholder with CSR policies and other obliging documents relating to this matter (such as the topic of anti-corruption, anti-money laundering, etc.)

On the other hand, regarding its market conduct, the company assures a political neutrality and commits to choose clients or business sectors whose activities do not violate the ethics and respect of human rights. Moreover, Greenfish commits to comply to good conduct rules in implementing its procurement policy in order to ensure fair competition conditions, a fair selection process of providers, and requesting that suppliers commit to respecting human rights and an ethical conduct of business.

Eventually, Greenfish commits to prevent any conflicts of interest by the revision and the modification of employment contracts, on the subject of loyalty to the company and the prohibition of auxiliary activities, or of shareholdings within third party companies that could compete with the company.

8. IMPLEMENTATION, MONITORING AND REPORTING

8.1 Strategy

As of 2019, Greenfish will set up its first CSR Strategy which is based on the outcome of a materiality matrix. The CSR Strategy will include the material topics and its set objectives. Together with the CSR Referees and the Steering Committee, the KPIs will be further developed and approved for implementation.



8.2 Implementation

Implementation will be done according to the set KPIs as mentioned above and will be kept in line with the ISO 26000 guideline for social responsibility. Action plans and time schemes will be set up per objective and/or theme. The CSR Manager will manage the workload and investments needed for correct implementation.

8.3 Monitoring and reporting

Because 2019 will be our first year implementing CSR according to set KPIs, we will be able to report in 2020. Reporting will be done according to the GRI guidelines or, depending on the advancement, by integrated reporting, combining financial and non-financial reporting.

9. AMENDMENTS

Some of the information provided in this CSR Policy could be revised or amended in accordance with the guidelines on the subjects, which may be issued by the government. The steering committee of Greenfish may decide to change all or part of the CSR Policy.

