

ENVIRONMENTAL POLICY

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1. Purpose

Viseven Europe OÜ (“Company”) recognizes that responsible environmental management is an integral part of sustainable business operations and long-term value creation. We are committed to conducting our business in a manner that protects the environment, supports sustainable development and contributes to the achievement of our strategic objectives.

This Environmental Policy (“Policy”) establishes the Company’s environmental commitments and provides the framework for establishing, implementing, maintaining, reviewing and continually improving the Environmental Management System (“EMS”) in accordance with ISO 14001.

2. Scope

This Policy applies to all Company operations, subsidiaries and affiliates under the Company’s operational control, including all directors, officers, employees and, where applicable, contractors acting on behalf of the Company.

The Policy covers the Company’s end-to-end provision of digital content creation services, including the development, operation and support of its proprietary digital content authoring platform – eWizard, together with all supporting business activities.

3. Leadership and Commitment

Top Management demonstrates leadership and commitment to the Environmental Management System by:

- 1) ensuring that this Policy and environmental objectives are compatible with the strategic direction of the Company;
- 2) integrating environmental management into business processes;
- 3) promoting continual improvement of environmental performance;
- 4) ensuring that adequate resources are available to maintain an effective EMS;
- 5) promoting environmental awareness throughout the organization;
- 6) supporting persons contributing to the effectiveness of the EMS;
- 7) encouraging continual improvement and innovation in environmental performance.

Environmental management forms an integral part of the Company’s governance framework and decision-making processes.

4. Environmental Commitments

The Company is committed to:

4.1. Protection of the Environment

Protecting the environment through the prevention of pollution and other commitments relevant to the Company's context, including:

- 1) sustainable use of natural resources;
- 2) efficient use of energy;
- 3) reduction of waste;
- 4) responsible management of electronic waste;
- 5) reduction of greenhouse gas emissions where practicable;
- 6) climate change mitigation and adaptation;
- 7) protection of biodiversity and ecosystems where relevant to our activities.

4.2. Compliance Obligations

Fulfilling applicable legal requirements and other compliance obligations relating to the environmental aspects of our activities, products and services.

4.3. Continual Improvement

Continually improving the EMS in order to enhance environmental performance.

5. Environmental Management System

The Company establishes, implements, maintains and continually improves the EMS in accordance with ISO 14001.

The EMS is designed to:

- 1) identify environmental aspects and impacts;
- 2) identify environmental risks and opportunities;
- 3) ensure compliance with applicable legal and other requirements;
- 4) establish measurable environmental objectives;
- 5) monitor environmental performance;
- 6) support evidence-based decision making;
- 7) drive continual improvement.

6. Environmental Objectives

The Company establishes environmental objectives at relevant functions and levels of the organization. Environmental objectives shall:

- 1) be consistent with this Policy;
- 2) be measurable where practicable;

- 3) consider significant environmental aspects;
- 4) consider compliance obligations;
- 5) consider environmental risks and opportunities;
- 6) be monitored and periodically reviewed.

Progress toward objectives is regularly evaluated by Top Management.

7. Environmental Risk and Opportunity Management

Environmental risks and opportunities are identified, assessed and managed as part of the Company's business planning and operational processes.

The Company considers environmental risks when planning new services, technologies, projects, operational changes and business initiatives.

Appropriate actions are implemented to:

- 1) prevent adverse environmental impacts;
- 2) improve environmental performance;
- 3) strengthen environmental resilience;
- 4) support sustainable business growth.

8. Environmental Aspects and Life Cycle Perspective

The Company evaluates the environmental aspects of its activities, products and services using a life cycle perspective where applicable.

Environmental considerations are integrated into service design, software development processes, procurement activities, supplier selection, outsourced processes, operational planning.

The Company encourages suppliers and business partners to adopt environmentally responsible practices.

9. Resource Efficiency

The Company is committed to improving resource efficiency by:

- 1) reducing energy consumption;
- 2) minimizing paper usage;
- 3) maximizing digital workflows;
- 4) reducing unnecessary business travel;
- 5) optimizing use of office resources;
- 6) promoting responsible consumption.

Remote collaboration technologies are used wherever appropriate to reduce environmental impacts associated with travel.

10. Waste Management

The Company applies the principles of reduce, reuse and recycle whenever practicable.

We seek to:

- 1) minimize waste generation;
- 2) separate waste streams where facilities exist;
- 3) ensure responsible disposal of electronic equipment;
- 4) reduce consumption of single-use materials;
- 5) promote circular economy principles where appropriate.

11. Sustainable Procurement

Environmental considerations are incorporated into procurement decisions.

Where appropriate, the Company considers:

- 1) life cycle perspective;
- 2) environmental characteristics of products and services;
- 3) supplier environmental performance;
- 4) opportunities to reduce environmental impacts throughout the supply chain.

The Company encourages suppliers to comply with applicable environmental legislation and internationally recognized environmental principles.

12. Competence and Awareness

The Company ensures that persons performing work under its control are competent on the basis of appropriate education, training and experience.

Personnel are made aware of (i) this Environmental Policy; (ii) significant environmental aspects relevant to their work; (iii) environmental objectives; (iv) their contribution to the effectiveness of the EMS; (v) the benefits of improved environmental performance; (vi) the implications of not conforming to EMS requirements.

Environmental awareness is maintained through regular communication and training.

13. Communication

The Company communicates this Policy throughout the organization and makes it available to relevant interested parties.

Internal and external environmental communications are managed in accordance with the Company's documented processes and applicable legal requirements.

14. Monitoring, Measurement and Performance Evaluation

The Company monitors environmental performance using appropriate indicators and periodically evaluates:

- 1) achievement of environmental objectives;
- 2) compliance obligations;
- 3) effectiveness of operational controls;
- 4) environmental performance trends;
- 5) opportunities for improvement.

Environmental information is reviewed during Management Reviews to support informed decision-making.

15. Continual Improvement

The Company continually improves the suitability, adequacy and effectiveness of the EMS through:

- 1) monitoring and measurement;
- 2) internal audits;
- 3) management reviews;
- 4) corrective actions;
- 5) preventive planning;
- 6) analysis of environmental performance;
- 7) continual improvement initiatives.

16. Responsibilities

Every staff member shares responsibility for protecting the environment and complying with this Policy. Managers are responsible for implementing this Policy within their areas of responsibility and ensuring that adequate resources, awareness and competence are maintained.

Top Management retains overall accountability for the effectiveness of the EMS.