

# UN GLOBAL COMPACT





## Table of Contents

Statement	3
Section 1: Human Rights	4
Section 2: Labor	14
Section 3: Environment	21
Section 4: Anti-Corruption	26
About this Report	33

### Statement from Ecolog International Commitment to the UN Global Compact

Ecolog International FZE and its subsidiaries, affiliates and branches worldwide ("Ecolog") reaffirms its support and participation in the United Nations Global Compact ("UNGC") initiative. Ecolog continues to be committed to responsible and sustainable business practices, while positively contributing to the quality of life of the communities in which we operate and beyond with the aim of achieving environmental excellence.

As the Covid-19 pandemic gradually declines, a new crises has emerged with the Russia and Ukraine conflict, posing extraordinary and unprecedented challenges to the global community. Ecolog continues to proactively and swiftly undertake precautionary measures in communication with our clients and service providers for the health, safety and well-being of our employees, stakeholders and the community at large as a top priority.

Ecolog successfully maintains its initiative through the 'EcoCare' division to provide state-of-the-art Covid-19 testing and vaccination services to several populations around the world to assist in the fight against the pandemic. Furthermore, Ecolog is actively supporting multiple efforts focused on the Russian and Ukraine conflict to address the resulting consequences, especially, the refugee crises.

Since joining the UNGC initiative in 2018, Ecolog has continued to demonstrably support and progress on its commitments to key initiatives, with particular focus on health, labor and environmental standards, ethical conduct, data protection, reporting and whistleblowing, vendor screening and vetting, anti-bribery, anti-corruption, anti-money laundering, sanctions compliance, amongst many others.

Ecolog is dedicated to providing a safe, secure and ethical working environment with open, honest and transparent communication. Ecolog's reputation, as a trustworthy provider of various goods and services in challenging locations and circumstances, is based on its unceasing will, integrity and ethics of every one of its employees and communities where we operate. To protect the long-term interests of all our stakeholders, at Ecolog we ensure that, we:

- Conduct business in a highly ethical manner in full compliance with all applicable national and international laws and regulations;
- · Recognize safety, health, and environmental considerations as basic elements of our business strategies;
- · Value diversity and respect the individuality of each employee, subcontractor and client; and
- · Contribute to the communities in which we operate.

Despite the global upheaval, Ecolog remains committed and believes it is more important than ever to adhere to and progress the UNGC's Ten Principles with respect to human rights, labor, environment and anti-corruption.

We take this opportunity to issue Ecolog's fourth Communication on Progress ("COP") report (Ecolog\_UNGC\_COP#4/2022 covering the reporting period: May 1, 2021 — Apr 30, 2022) summarizing the initiatives and results of our efforts to support the UNGC's Ten Principles.

Isni Aziri

For and on behalf of Ecolog International FZE

Principle 1: businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

### Assessment, Policy & Goals

Ecolog has a written policy titled Code of Business Ethics and Conduct where the topics of human rights are addressed. Ecolog's leadership commits to implement the principles of ethics within the group of companies and to ensure that Ecolog's business partners comply with the same values. Ecolog has also implemented a 24/7 global Ethics Hotline and Web-Portal which allows users to unanimously report issues in order to assess and act on any violation from any party without prejudice.

Ecolog's policies, regulations, procedures and all other guiding principles support and require the respect and uphold internationally declared human rights, ensuring no involvement in any human right abuses, which are clearly communicated to all employees and stakeholders at all levels of the business, through means including, but not limited to, our company's employee induction training program, supplier due diligence, etc. which are mandatory for each and every engagement.

Ecolog is committed to a harassment free work environment. Our zero tolerance towards, workplace harassment, including physical, verbal, sexual or psychological harassment, abuse, or threats of any kind are clearly communicated. All employees and stakeholders are made familiar with the reporting and incident handling procedures and encouraged to report such incidents with confidentiality, free from retaliation and harassment, either through their line of supervision or through our Ethics Hotline and Web-Portal.

Ecolog continues to closely monitor and tackle the spikes of the Covid-19 pandemic across all of our operations globally and carefully resume business as usual while adopting appropriate risk mitigation measures. We are takingall reasonable precaution as advised by World Health Organization (WHO) and directives of the countries where we operate. While we continue to operate in a reasonably normal manner, we have implemented the following measures:

- Task Force: We strengthened our controls and processes through oversight by a dedicated COVID-19 task force:
- Extended Hygiene Precautions: We applied strict hygiene precautions at all our offices and operational sites around the globe;
- Adherence to Temporary Office Closures & Work-from-Home policy: We adhere to the national directives of temporary office closures during lock-downs and curfews (as required by the applicable governing authority);
- Refresher Training on Health & Safety: Ecolog's Training Department is actively providing digital refresher training and launching awareness campaigns by issuing updated training materials elaborating on the health and safety bestpractices and updates on preventive measures to be strictly adhered to by all.

Ecolog actively supports multiple efforts focused on the Russia and Ukraine conflict to address the resulting consequences, especially, the refugee crises, which includes, but is not limited to, offering food and shelter, together with our business partners to provide aid and relief.

- Reference Company Policies (Human Rights Principles):
- 1. Competence Training and Awareness Standard Operating Procedures (SOP);
- 2. Pre-deployment Training Record;
- 3. Pre-deployment Training Materials:
  - a. Code of Business Ethics and Conduct;
  - b. UN Supplier Code of Conduct;
  - c. Anti-Bribery and Anti-Corruption;
  - d. Combatting Trafficking in Persons (CTIPs);
  - e. Ecolog Ethics Hotline;
  - f. Grievance Policy and Procedures
  - g. Performance and Disciplinary Policy and Procedures;
  - h. General Data Protection Regulation (GDPR);
  - i. Quality & Safety Induction Training Material & Records;
  - j. Sexual Harassment;
  - k. Medical Aid;
  - I. Security Anti Terrorism and Hostile Environment;
  - m. Security Identify and React to Improvised Explosive Devices (IED) ENG;
  - n. Health & Safety & Environment Policy Awareness.

### Implementation - through effective management systems.

Prior to commencement of work, all employees are required to attend the induction training program. The aim of the program is to provide employees with an acceptable level of awareness and competence that will allow them to perform their jobs effectively, safely and ethically. The induction program, delivered partly prior to their deployment and partly upon arrival at work location, is executed in accordance with Ecolog's Competence Training and Awareness Standard Operating Procedures ("SOP"), through an integrated effort by Human Resources ("HR"), Quality and Safety and other functional departments within which work is performed. The induction program focuses on the creation of awareness and understanding of the company's policies, standards and guiding principles in support of general business operations regardless of geographical location, and specifically in relation to the respect and protection of human rights, and our commitment to combatting the abuse of human rights.

### Combatting Trafficking in Persons ("CTIPs")

The CTIPs policy establishes the responsibilities and implementation process for complying with the applicable laws and regulations related to combating trafficking in persons (including, but not limited to, UNODC Model law against trafficking in persons; UN Protocol to prevent, suppress and punish trafficking in persons especially women & children, E.U. Anti-Trafficking Legislative Directive 2011/36/EU, European Court of Human Rights, Council of Europe Convention against trafficking in human beings, U.S. Government's Federal Acquisition Regulation (FAR) Subpart 22.17, 52.222-50, and 52.222-56, and Defense Federal Acquisition Regulation Supplement (DFARS) Subpart 222.17, and 252.222-7006(B)).

Ecolog's CTIPs policy stipulates that no employee or subcontractor (including subcontractor's employees) and/or their agents shall:

- · Engage in trafficking in persons during the period of performance of the contract;
- Procure commercial sex acts during the period of performance of the contract;
- Use forced labor in the performance of the contract;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigrationdocuments, such as passports or drivers' licenses, regardless of issuing authority;
- · Use misleading or fraudulent practices during the recruitment of employees or offering of employment;
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place i.e. nolicense to perform recruitment services;
- Charge employees' recruitment fees;
- Fail to provide return transportation or requiring payment for the cost of return transportation for certainemployees;
- Provide or arrange housing that fails to meet the host country housing and safety standards;
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other requiredwork document in writing. Such written work document shall be in a language the employee understands;

Ecolog's CTIPs policy takes into account the universal condemnation of the crime of trafficking in human beings and reiterates that it constitutes a serious abuse of human rights and is, therefore, applicable to all Ecolog employees and subcontractor personnel, emphasizing the zero-tolerance towards any violations, with all of the following incorporated in our CTIPs policy:

- Establishment of both education and of specific training to be used to raise the awareness of the issues connected to trafficking in human beings and of the means to combat it along with an internal reporting mechanism on violations of the policy;
- Ecolog will provide all employees training and obtain written acknowledgement from the employee that they understand and abide by the terms of the statement;
- Ecolog will take appropriate action, up to and including termination, against employees that violate the CTIPs policies;
- Ecolog will include the substance of this clause in all subcontracts. Ecolog and all subcontractors, at all tiers, are
  reminded of the prohibition, against knowingly destroying, concealing, removing, confiscating, or possessing any
  actual or purported passport or other immigration or identification document, of another person to prevent or
  attempt to restrict, without lawful authority, the person's liberty to move or travel in order to maintain the labor or
  services of the person, when the person is or has been a victim of a severe form of trafficking in persons;
- · Prevent inhumane living conditions;
- Not withholding employee passports;
- To supply the employees with signed employee contract copies translated in English and their native language and comply with international laws of the host country; and
- Developing guidelines and procedures for relevant government authorities and officials such as police, border guards, immigration officials and others involved in the detection, detention, reception and processing of irregular migrants, to permit the rapid and accurate identification of trafficked persons.

In June 2020, Ecolog updated its Human Trafficking Policy Statement which was shared with all of its employees and stakeholders and published on its corporate website, as part of the continuous commitment to adhere to the CTIPs policy and the evolving changes necessary to be adopted from time-to-time.

### Measurement of Outcome - through effective monitoring & evaluation mechanisms.

Ecolog's HR systems and records are well maintained and keep track of all employment and grievance issues and actions are taken promptly and appropriately to resolve all issues.

Employees receive training specifically addressing policies and procedures concerning aspects of human rights upon joining, and an equal amount of hours every subsequent year as these training topics are subject to annual refreshment. The percentage of employees trained upon commencement of work through our deployment centers is 100%, and between 80-90% at any given time with respect to refreshment training on these topics, depending on country of operation.

Following a recent update of the Sexual Harassment Prevention Policy, Ecolog's HR department has held additional trainings to protect our organization from unwanted consequences, while building a positive work environment that is free from harassment and discrimination. Employees and supervisors are trained to understand and to recognize harassment in the workplace and to appropriately respond to the same. Even when sexual harassment prevention training is not mandated by local law, we are taking a proactive approach in protecting our employees, business partners and coontractors from inappropriate conduct.

Our programs meet all the latest global standards and is executed for perfect coverage across our multi-national enterprise. If a Sexual Harassment case is reported, it is immediately investigated and closed with the appropriate measures taken to correct the deficiency and prevent it from happening again.

All employees receive medical aid awareness training as part of their induction training focusing also on serious infectious deceases. The Infectious diseases training is updated to reflect the current situation with COVID-19 pandemic.

All security personnel are subject to the same company induction training program as described above. As such, all security personnel are upon employment, made aware of company policies and procedures concerning relevant aspects of human rights.

### Corporate Social Responsibility ("CSR")

In 2022, Ecolog introduced a new Corporate Social Responsibility Policy. We consider corporate social responsibility (CSR) to be an important part of the manner in which we conduct our business. CSR means we acknowledge that, as a business, we have a responsibility to our clients, our staff, suppliers and other stakeholders as well as the broader society in which we operate. We aim, through our firm's practices and policies, to create value for our staff and clients, minimize our impact on the environment and improve the quality of the local community.

We believe that having a clear and focused CSR strategy with clear aims and objectives has real benefits for our firm. We rely on having a healthy, diverse and talented workforce and seek to recruit and retain the best people. We must also ensure we are known for offering a high level of service to our clients. We aim, therefore, for our business to reflect the environmental and social issues that are important to our staff and our clients, as well as other relevant stakeholders. We also acknowledge that, for long-term commercial success, we rely to an extent on the health of the environment and the economic strength of our local community.

By putting CSR into practice, we are committed, wherever possible, to:

- Having high standards of governance and risk management within our business
- · Conducting ourselves responsibly and in an ethical manner
- Creating a positive and supportive working environment
- Having an active role in supporting local communities
- Improving service levels to clients
- Acting fairly in our dealings with suppliers and other third parties
- Minimizing the impact on our environment

Ecolog continues to contribute to communities where it operates with local employment, training programs and by supporting a broad variety of local community projects that promote higher economic welfare and standards of living. We support and are involved in community development and charitable organizations, and participate in other volunteer activities. From rebuilding schools that have been damaged in conflict environments to donating waste-management trucks to municipalities, over the years, Ecolog has contributed to the building of thriving communities in the areas in which we serve. We are proud to support peace keeping missions and the work of humanitarian organizations within these regions. Furthermore, through the swift launch of Covid-19 testing and vaccination services since the beginning of the pandemic to various governments around the world under the 'EcoCare' division, Ecolog has demonstrated its commitment to corporate social responsibility.

1. In May 2021, Ecolog continued to provide food parcels and financial funds to orphanage centers in the Bamako region. We are thankful to our staff and management who also joined the delivery action voluntarily to support the children in need. It's a true blessing to have the opportunity to help these centers with supplies but also very humblingto see that the children and caretakers appreciated most the presence and company of our team.

www.facebook.com/EcologGroup/posts/10165273157155054



2. In May 2021, Ecolog's team in Iraq continued to support the local community in Basra by providing food parcels to help the families during Ramadan and Eid Celebrations. In what has become a tradition, Ecolog drives this initiative through the "Ramadan Caravan" event that is organized by our team in Basra on a yearly basis. It is intended to help bring the communities together and ease some of the difficulties they face.

The initiative consisted of 280 food parcels containing rice, flour, cooking oil, milk and other basic food items that were distributed to families in the local community.



https://www.linkedin.com/feed/update/urn:li:activity:684754232717 1420160

4. In September 2021, in a ceremony organized at Ecolog International's premises in Tetovo, North Macedonia, the company donated ten ambulances to hospitals with one aim: To strengthen their capacity and provide better emergency services when needed most by citizens during times of pandemic.

The state secretary for health, Ivanka Stojanovski and the heads of healthcare centers from nine cities attended.



5. In October 2021, Ecolog International organized various initiatives across multiple countries in recognition of Breast Cancer Awareness Month and raise awareness about the importance of education, early detection, treatment, and palliative care.

In cooperation with the local hospitals, we have organized campaigns to raise awareness and stress the importance of early detection of the disease to include free screening and checkups for our employees.

Moreover, Ecolog International donated medical supplies for treatment of Breast Cancer patients and survivors at CHU Hospital Mother-Child "Luxembourg", Bamako, Mali.



6. As part of Ecolog's ongoing efforts to help local communities where it operates and in recognition of the challenges less developed countries are facing in the fight against COVID-19, Ecolog donated laptops in 2021 to the medical centers in close communities in Basra.

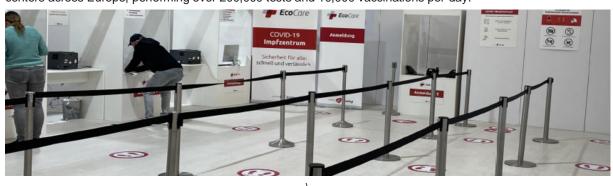
The laptops were intended to help facilitate and accelerate the registration process, and to assist with the local database maintenance in centers that offer COVID-19 vaccinations.





Ecolog's CSR initiative within the last twelve months has strongly focused on Covid-19 testing and vaccinations to the general population, including initiatives where such testing and vaccination was offered at little to no costs to the subject users (as permissible by the applicable governing authority), and education to ensure children can engage in development and growth, even during unprecedented circumstances.

In just one year, EcoCare has become the most dynamic division of Ecolog International and one of the European leaders in the fight against COVID-19. Since the beginning of the pandemic, EcoCare has made an immense contribution across Europe to help contain and control the spread of the virus. EcoCare also evolved into a trusted and reliable partner for governments, being of the few private companies to deploy hundreds of test centers across Europe, performing over 200,000 tests and 10,000 vaccinations per day.



In **Luxemburg**, EcoCare ran a nationwide COVID-19 testing program commissioned by the Government of Luxemburg. A mobile laboratory and 17 drive-through q-PCR testing stations were deployed in record time. Since then, EcoCare has performed p to 20,000 tests per day.

In **Germany**, EcoCare became one of the biggest testing operators. Through the cooperation with a few other partners, EcoCare deployed almost 500 test centers on the parking lots of a few supermarket chains. Various types of tests are offered, including PCR or antigen test, and the "citizen tests" – free tests provided by the German Government to every citizen. More than 50,000 tests are performed daily in these test centers throughout Germany. Registration, appointment bookings and results delivery are enabled through EcoCare's own digital platform available as a mobile application. Additionally, since the end of 2020, EcoCare has been operating 30 mobile vaccination teams and eight large centers for mass vaccinations with a capacity of up to 10,000 people per day.

In the **United Kingdom**, EcoCare deployed 10 state-of-the-art laboratories commissioned by the UK Department of Health (DHSC). Located in 10 locations throughout the country, the test centers have cumulative daily capacity of 100,000 RT-PCR tests.

In the **Netherlands**, EcoCare became a partner of a Dutch state Foundation, Open Nederland, aiming to reopen the social activities in the country via free express antigen tests. In June 2021, EcoCare deployed and successfully operated six testing centers with eight more that were prepared for deployment in the weeks that followed.

EcoCare also operates test centers in 10 major European airports: Eindhoven, Brussel, Luxembourg, Dusseldorf, Frankfurt, Hamburg, Hannover, Memmingen, Nuremberg and Stuttgart. Both PCR and rapid antigen tests are offered throughout those facilities and results are provided with internationally recognized travel certificates. As of June 2021, EcoCare began installing its own laboratories in the airport test centers to improve customer service and speed up the delivery of results.

The Exclusive Health & Safety Partner of the Munich Security Conference 2022 EcoCare commissioned to carry out daily COVID-19 tests on top politicians and Diplomats.

In February 2022, EcoCare was the exclusive health & safety partner for the Munich Security Conference 2022 and entrusted by the organizers to carry out the highly complex implementation of their test concept. The conference hosted top decision-makers in Munich to discuss how they can make the world a little safer, In order to maximize health protection, a detailed hygiene & safety concept was prepared and presented. In addition to comprehensive vaccination requirements and mandatory masks, testing of all participants was conducted on a daily basis.



As the trusted health & safety partner, EcoCare conducted daily PRC testing on hundreds heads of state and government officials, representatives of governmental and non-governmental organisations, and leading decision-makers in politics and business from all over the world. In order to ensure the health and wellbeing of everyone involved, it was also important to test all other supporters and service providers of the conference consistently and without exception.

Benedikt Franke, CEO of the Munich Security Conference stated, "We are extremely pleased to have Ecolog, a long-standing partner of the Munich Security Conference, for the highly complex implementation of our test concept. We couldn't ask for a better health & safety partner" Benedikt continued to add "We have always been able to rely on Ecolog in the past, and this time we are again sure that the testing of our guests and service providers is in the best hands with Ecolog."

### **Ecolog's Commitment to SDG 4**

Ecolog ensures that it works with local communities in underdeveloped economies at the grassroots level to attain the SDGs. We have

- · Outfitted state-of-the-art computer facilities at the University of Bangui in the Central African Republic;
- Continued to work with the institution to create trainee programmes to increase opportunities for local university graduates; and
- Installed new mobile units to be used as school facilities for over 100 children in the Al Nasr community near Baghdad in Iraq.

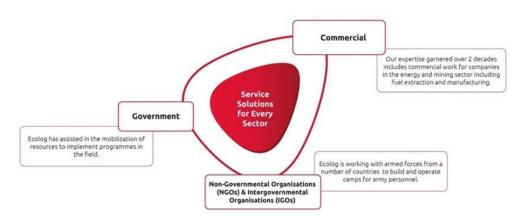
### **Ecolog's Commitment to SDG 9**

Environmental goals are intertwined with the SDG goals related to industry, innovation and infrastructure. This is a unique opportunity to develop a niche market with new and innovative technologies. We have:

- Implemented an Environmental Management System certified to ISO 140001:2015 standards;
- Promoted environmental friendly technologies like our Hybrid Power Project which combines mobile generators
  with high efficiency photo-voltaic cells that save 30% of fuel and reduce our carbon footprint while creating critical
  infrastructure for our remote business locations; and
- Used "Smart Camp" technology to optimize integrated facility management to reduce the use of fossil fuels and general power consumption.

### **Ecolog's Commitment to SDG 17**

Partnerships will harness the power of all stakeholders to make the world a better place. Partnering with Non-Governmental Organisations and International Governmental Organisations helps industry to realize goals through innovation and real action.



Principle 3: businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect to employment and occupation.

### Assessment, Policy & Goals

Ecolog has well-defined written policies and procedures addressing various aspects of the labor principles (including but not limited to human trafficking, child labor, etc.), These labor principles are further prescribed in our employment contracts which are governed by the local labor laws of the country of residence and/or the standard set by InternationalLabor Organization ("ILO"). Ecolog's commitment to the effective elimination of forced or compulsory labor is amongst others clearly communicated as part of the company induction training to all employee levels through our mandatory Combatting Trafficking in Persons (CTIPS) Policy Awareness Training. Our CTIPs policy and training highlights our zero tolerance towards trafficking in persons and covers all relevant aspects of what trafficking in persons is, how it relates to our operation and their employment, how to combat trafficking in persons and forced or compulsory labor, and finally our responsibility to report any suspicions related to trafficking in persons. The latter is further supported by our Ethics Hotline Training enabling employees to confidentially report any such violations.

Additionally, all our employees receive upon their employment (and continually thereafter on an annual basis), awareness training on the company grievance policy and procedures, and the company code of business ethics and conduct, which clearly communicates our commitment to equal opportunity for all and a discrimination free workplace, which is free of discrimination on the basis race, color, religion, age, gender, etc. Ecolog has also put in place an Equal Employment Opportunities Policy for effective application and monitoring of employment practices and a Sexual Harassment Prevention Policy clearly describing our zero-tolerance towards any form of sexual harassment in the workplace and associated procedures and measures in case of any violations.

Ecolog ensures its adherence to the highly reputable ILO's ETI Base Code in line with relevant contractual requirements, and for this purpose has specific clauses in the employment contracts.

### **Equal Opportunities**

Ecolog is committed to promoting equal opportunities in employment and treating all employees with dignity and respect. All employees and any job applicants will receive equal treatment regardless of age, disability, gender identity, marital or civil partner status, pregnancy or maternity, race (color, nationality, ethnicity or national origin), religion or belief, sexual orientation, or any other characteristic protected by law (also referred to as Protected Characteristics).

This policy sets out Ecolog's approach and intention to equal opportunities, and the avoidance of discrimination at work. It applies to all aspects of employment with Ecolog, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, employee benefits, application of policies, termination of employment, and matters after termination including but not limited to visa issues, end of service benefits, and references.

This policy is intended to help Ecolog achieve its diversity and anti-discrimination aims by clarifying the responsibilities and duties of all the staff in respect of equal opportunities and discrimination and conforms to the text and spirit of all applicable laws and regulations applicable under the national law of the countries of performance, in whole or in part, where a contract takes place.

Reference Company Policies (Labor Principles):

- Competence Training and Awareness Standard Operating Procedures (SOP);
- · Onboarding Acknowledgement Form;
- Pre-deployment Training Materials & Records:
  - · Code of Business Ethics and Conduct;
  - · UN Supplier Code of Conduct;
  - Sexual Harassment;
  - · Ecolog Ethics Hotline;
  - · Equal Opportunities Policy;
  - · Grievance Policy and Procedures;
  - · Performance and Disciplinary Policy and Procedures;
  - Quality & Safety Induction.

### Implementation – through effective management systems.

### Awareness Training or training for employees on labor rights and policies:

Prior to commencement of work, all employees are required to attend the induction training program. The aim of the program is to provide employees with an acceptable level of awareness and competence that will allow them to perform their jobs effectively, safely and ethically.

The induction program, delivered partly prior to their deployment and part upon arrival at work location, is executed in accordance with Ecolog's Competence Training and Awareness SOP; through integrated effort by HR, Quality and Safety and other functional departments within which work is performed. During the company's induction training, employees are made familiar with all aspects of their job within the company to include their rights, what is expected of them in terms of both conduct and work performance, and associated policies and procedures.

Our HR Department ensures that employees are made aware of their rights, benefit entitlements, and associated employee policies. While, the functional departments take care for their onboarding on the job, covering job related rights and expectations such as standards of performance, work location specific rules and policies, emergency response and procedures, etc.

Our quality and safety department supplements these trainings with specific quality and safety training, both as part of their induction, and also on-the-job training to make sure that employees received basic levels of trainings prior to and during the performance of their employment. Ecolog requires that each employee is competent and capable to conduct their employment correctly, safely, and as per the requirements set out in their contracts. Therefore, Ecolog has a duty of care to ensure its employees have proven competence prior to recruitment and undergo continuous learning and development throughout their employment to maintain performance and competence levels.

### Support vocational training and counseling programs:

Ecolog recognizes the essential importance of people and competency for the delivery of quality services, thus remains fully committed towards implementing and ensuring training and development opportunities at all levels and to include specifically local staff; allowing personnel to pursue and achieve excellence within their individual job roles and advance to higher levels of understanding and responsibility.

To reach these objectives, the company utilizes existing recognized vocational and educational networks, where applicable and available. This, in addition to, in-house training activities and programs run at various levels and locations. Our Supervisor Trainee Programs are an example of this.

### Reporting Violations:

Ecolog has defined procedures for reporting of any violations, discrimination or inappropriate conduct to the employee's line management, HR department, and/or Ethics Hotline and Web-Portal, and proper investigation is conducted accordingly. Ecolog does not allow for any retaliation against an employee for reporting misconduct in good faith. All employees must cooperate in internal investigations of potential or alleged misconduct. A grievance procedure is in place for employees to use for reporting cases.

### Health & Safety

Ecolog has developed and implemented a Safety Management System ("SMS") to document company's best business practices, better satisfy the requirements and expectations of our customers and improve the overall HSE Compliance of the company. This system provides the policy framework for our Health and Safety program. Underpinning this, is the company's certified ISO 45001:2018 management system that provides procedures for managing health and safety at all levels.

The SMS has been adapted to hazard management, prevention of harm to people and the environment, ensuring the company maintains a sustainable business. The SMS framework provides a broad-based set of expectations set out in ourLeadership and Management Policy which is incorporated within the Integrated Management System ("IMS"). This framework helps managers focus on critical safety needs, forecasting and allocating resources, setting direction for Safety activities, and consistently delivering improved Safety performance.

Ecolog considers the health of its employees and subcontractors as priorities, and aims at the promotion and maintenance of the highest degree of physical, mental and social well-being of workers in all occupations. In the wake of the worldwide COVID-19 pandemic, Ecolog has closely monitored the situation with high consciousness. Ecolog established an Emergency Response Team at corporate level comprising of representatives from HSE, HR and Operations to monitor, advice and intervene when/where needed to ensure that all Ecolog personnel are aware and following Preventive Control Measures.

In light of the recent outbreak of the novel coronavirus, COVID-19, Ecolog International has enacted several precautionary measures to ensure the wellbeing of people. Ecolog International has closely monitored the situation and acted in accordance with the Risk Communication and Community Engagement Action Plan and UNICEF jointly, and in line withGovernment directives in respective countries.

The commitment for health and safety is owned at the highest management levels along with all our employees to take ownership in performing their tasks safely. The management has full accountability for all health and safety matters within Ecolog and has assigned operational responsibilities and authority to the leadership team for all safety matters. It is their responsibility to ensure that this is communicated and understood across the organization. This includes:

- · Ensuring that the SMS conforms to the requirements of the ISO 45001:2018 International Standard
- · Reporting on the performance of the SMS and on opportunities for improvement to the leadership team

As Ecolog's structure is decentralized, the responsibilities of health and safety cascade down through the management team as directed by the CEO and the country General Managers.

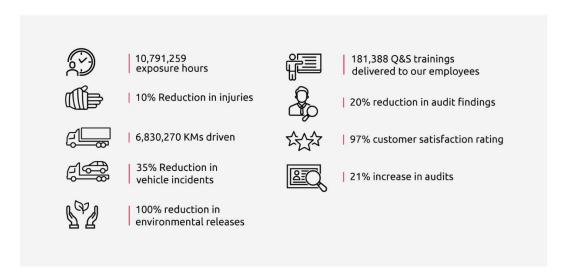
Ecolog communicates and allows participation with employees on health and safety matters through meetings, inspections, conducting risk reviews and feedback to understand their challenges on the job.

At the operational level, health and safety through the SMS ensures that activities at the deepest level are reviewed for hazards and associated risks. Our health and safety program is structured in a way that continuously helps us put in place appropriate control measures in tasks where significant hazards to health and safety cannot be practicably reduced. Our commitment to health and wellbeing is also reinforced through medical surveillance checks for all employees, to ensure that they retain health and wellbeing through their employment with Ecolog.



The safety processes, such as trainings and evaluations, are the most effective ways in getting workers to contemplate-safe work practices – but instituting safety awareness campaigns is an extra step taken to get people analyzing safety at all times, even outside of the workplace. QS Central Department prepares a yearly Matrix with all HSE topics and in cooperation with Marketing Department prepare posters that are dispersed internally and externally in different sites where Ecolog International operates.

In the last year, Ecolog has achieved great improvements in all areas of quality and safety. Some highlights of oursuccess within the past year are shown below:



### Data Privacy and Information Security

At Ecolog, we ensure that the requirements, impact and implications of European Union's General Data Protection Regulation (as amended) ("GDPR") is effective since May 2018 and are incorporated in our business processes to confirm that we are fully compliant with the new rules. Additionally, Ecolog is also wholly compliant with the United Kingdom's Data Protection Act of 2018 (as amended) ("DPA") and similar legislation enacted by countries where we operate. We continue to be committed to the protection of all personal data relating to clients and employees, while ensuring that the company's policy is, to the extent it is consistent with any local regulations, and such principles of GDPR and DPA will also quide our policies outside Europe.



Ecolog used GDPR as an opportunity to review the way we collect, store, process and safeguard personal data. The necessary additional new policies and tools are being introduced in the company to ensure that all data is stored and used in accordance with the GDPR's new privacy, transparency and individuals' rights provisions, while also ensuring that we are communicating with our clients and contacts in a way that complies with the new rules. In this regard, the company has put in place its Data Privacy Policy, Privacy Notices, Cookies Policy, Data Protection Officer appointments, and other relevant procedures and processes.

Ecolog takes personal data privacy seriously, and continuously conducts interactive GDPR and DPA Awareness trainings across all areas of operation, in order to provide employees with an overview of regulation and what practical actions to take in everyday tasks in order to comply with the same.

Ecolog International FZE has recently become a bronze member of The International Association of Privacy Professionals ("IAPP") – the world's largest and most comprehensive global information privacy community. An IAPP corporate membership shows our commitment to data protection, as well as, gibes us access to the privacy education, resources and information needed to effectively manage data protection risks and challenges.



Furthermore, Ecolog's Information Security Policy, provides the mechanism to protect against information security threats and ensures that information is protected against unauthorized access, data confidentiality assured, data integrity maintained, and that regulatory requirements regarding Data Protection, Intellectual Property Rights, and Privacy of Personal Information are met.

Ecolog Deutschland GMBH has recently been granted the Management System Certificate for Information Security in Healthcare Division NEN 7510-1:2017, for all operations of the healthcare unit within EU and Benelux where this standard applies. The certificate with number K-0204950/01 is valid until 25 April 2025.

By obtaining the NEN 7510 certificate, Ecolog demonstrates that it meets all the applicable information security requirements for safety, reliability and availability in the healthcare division. The new standard for digital exchange of patient information has also been developed based on this standard.

Due to the high sensitivity of the data, the healthcare sector is closely monitored when it comes to privacy and information security. We highly value data privacy, and shall further continue to implement the adequate technical and organizational measures to ensure the lawful processing and proper safeguarding of personal data.



### Measurement of Outcome – through effective monitoring & evaluation mechanisms.

Ecolog's HR systems and records are well maintained and keep track of all employment and grievance issues and actions are taken promptly and appropriately to resolve all issues.

Demographics of management and employees: There are about 57+ nationalities working with Ecolog amongst a total pool strength of circa 8000 employees.

Employees receive mandatory training specifically addressing policies and procedures concerning aspects of human and labor rights upon joining, and equal amount of hours every subsequent year, as these training topics are subject to annual re-training.

 The percentage of employees trained upon commencement of work through our deployment centers is 100% and between 80-90% at any given time, with respect to re-training on these topics depending on country of operation

### Occupational Health and Safety

Being a RoSPA Gold Award winner, it means the company has achieved a very high level of performance, demonstrating well developed occupational health and safety management systems and culture, outstanding control of risk, and very low levels of injury, harm and loss.

Health and safety has always been our number one priority, yet we are proud to have received outside recognition of our hard work and commitment by such a highly respected organization. Despite the benefit to our staff, this award also benefits our customers in terms of their confidence in our existing standards.

Ecolog continues to participate on the ongoing Award Winner Program to stand out in its commitment and consistency of keeping and maintaining the Safety Management System in the highest possible level. As a result of a fantastic Health and Safety performance in 2021, Ecolog was awarded for the 3<sup>rd</sup> year in a row with the RoSPA Gold Award.

Principle 7: businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Assessment, Policy & Goals

Reaching environmental excellence is one of the main business objectives of Ecolog by dedicating significant efforts and resources to address key sustainability-related issues, from recycling, waste prevention, conservation of natural environments to energy efficiencies, and emission reduction.

Ecolog's commitment is reflected in our Environmental Policy. Other key principles that guide our effort towards environmental excellence are also aligned with our contracts with international organizations, businesses and NGOs, whom all have various levels of environmental practices that Ecolog follows.

### Our clients and their guidelines include but is not limited to:

Contaminated Land (EHS) Guidance, World Bank / IFC

EPA/540/F-95/041 - Soil Screening Guidance, US EPA

GPLC 1-3 - Contaminated Land Assessment, Environment Agency

NATO Standard AJEPP-6 (Edition A Version 1, November 2014) Environmental Baseline Studies

Science report: SC050021/SGV – Using Soil Guideline Values – Environment Agency

CLEA model and software - Environment Agency

Hydrogeological Risk Assessment for Land Contamination – Environment Agency

STANAG 7141 Joint NATO Doctrine for Environmental Protection During NATO-led Military Activities (AJEPP-4)

STANAG 2510 Joint NATO Waste Management Requirements During NATO-led Military Activities (AJEPP-5)

STANAG 2583 Environmental Management System in NATO Operations (AJEPP-3)

### **UK MOD Global Food Contract**

Marine Stewardship Council LEAF (Linking Environment and Farming) Global Good Agricultural Practices (GAP)

Ecolog has established a strategy where we strive for zero intentional environmental releases and spills. An example of our partnerships with industry is linked with the UK Ministry of Defense contract, that utilizes efficient commercial sea routes that operate 40' feet containers rather than the militaries normal shipping route where only 20' feet can be used. This initiative aims to reduce carbon emissions by 10%. We intend to realize this by employing local companies with existing infrastructure and supply chains to fulfill deliveries to smaller locations. Our procurement teams source where possible local products to reduce food carbon footprint.

Our UK teaming partner has put in place initiatives to mitigate environmental impact. In order to reduce the pollution and greenhouse gases produced by their fleet, they have committed to only purchasing vehicles that conform to the latest European emission standards. Our partner has also begun reducing food miles by using driver performance software to identify ever more fuel-efficiency. This has resulted in a reduced our CO2 eq. emissions in the UK by 32% relative to 2006.

Ecolog is also committed to minimizing negative impacts to the local biodiversity and ecosystems that we operate in, this includes, but is not limited to, carefully studying of the potential impacts and aspects, and putting in place appropriate mitigation plans.

### Environmental Policy

Some initiatives of Environmental Innovation implemented by Ecolog:

- Implementation of a lead-acid battery recycling system in a remote location in Afghanistan which reduced the requirement for off-site removal and disposal of hazardous waste by 90% within the project.
- Addition of lamellar separators to waste water treatment plants in Kosovo to improve the quality of effluent and meet local discharge requirements.
- Provision of controlled septic treatment systems on remote military camps in Central African Republic, removing the requirement for off-site removal and disposal of wastewater.
- Operation of a two-line Material Recovery Facility in a military facility in Afghanistan to maximize recycling of waste generated within the base.
- Provision of centrifuge and thermal desorption for treatment of oil contaminated wastes from Oil and Gas operators in Qatar.
- Development of processes to produce saleable products from plastic wastes generated in Military locations
  throughout Mali, providing products, which can be used by the local population in re-manufacturing or directly by
  the community.
- Development of processes and procedures for wastewater re-use in irrigation in a number of our locations around the world.

Ecolog conducts its business when all associated environmental impacts and risks are understood and controlled to acceptable levels. Ecolog acknowledges that the principles of sustainable development are integral to responsible resource management that overlie all our activities, products and services. Therefore, Ecolog will strive to minimize impacts on the physical environment and avoid negative social impacts.

Ecolog's commitment to the environment and its implementation of the Environmental Management System ("EMS") will ensure:

- · Appropriate activities conducted by Ecolog are aligned to the EMS;
- · Achievable environmental objectives and targets are established;
- A commitment to protecting the environment and the prevention of pollution;
- · Strong assurance in achieving compliance obligations;
- · Create a culture of continual improvements within the EMS for our environmental performance; and
- Comply with applicable environmental laws and regulations, and where adequate laws do not exist, adopt and apply standards that reflect Ecolog commitment to a balanced environment.

### Implementation - through effective management systems.

Ecolog has an established Environmental Management System (EMS) that has been
certified to ISO 14001:2015 from British Standard Institute (BSI) with UKAS
accreditation. We are also liable to our contract holders' audits that occur on yearly
basis, and verify our own internal processes and system for compliance to
environmental requirements.



- We conduct internal environmental audits, every quarter, to ensure our operations comply to the applicable statutory and contractual requirements. These audits are consolidated via our internal tracking system and communicated to the management teams for further review and discussion at management level. Each location has an impact and aspects study conducted, to determine the overall environmental impact our operations have on the environment.
- Ecolog is a world class provider of comprehensive trash removal, recycling, and environmentally safe waste
  management solutions. It has developed a range of fully integrated waste management systems that are
  implement- ed through the collection, disposal, and recycling of discarded hazardous and non-hazardous materials
  in a manner that is safe, efficient, and fully compliant to the strictest environmental regulations, and has access to a
  network of waste transfer and recycling centers and a regional network of landfill sites.
- Ecolog has implemented environmental trainings across all our operations that starts from our initial induction on
  joining the company to the ongoing site trainings and task specific activities. Ecolog also encourages employees
  to seek further knowledge and learning through industry events and incidents to bring further knowledge to the
  business.

### Promoting Environmental Friendly Technologies

Ecolog has entered additional partnerships in promoting environmental friendly technologies and some of these include:

- 1. Ecolog has strategic partnership with provider of advanced pitless drilling and dewatering technologies, to provide an integrated and innovative solution to the hydrocarbon industry.
  - Ecolog has strategic partnership with a provider of advanced pitless drilling and dewatering technologies, to provide an integrated and innovative solution to the hydrocarbon industry.
- 2. Ecolog has strategic partnership with a solar-powered water desalination technology company to scale anddeliver a game-changing solution that harnesses the world's two most abundant resources sunshine and sea water and purify even the toughest water types without the need for filters, chemicals or polluting fossil fuels.
  - We hope to bring change to water and energy services and create the foundation of Ecolog's future growth in the energy and water sector. It is crucial for all of us to be creative, innovative and ambitious to meet our climate crisis andseize the enormous opportunities for a better tomorrow. Access to reliable water underpins all aspects of life, from its use in medical services, to manufacturing and productionof essentials to personal hygiene including simply washing our hands. Water scarcity and stress affects nearly 40% of the world's population, an alarming figure that is projected to further rise as a result of climate change, urbanization and population growth. As the need for desalination grows rapidly, no technology was previously available to reduce dependency on fossil fuels, optimize the operational cost and deliver a robust and reliable performance even for remote areas and various water conditions. By harnessing solar energy in a more effective way and with a patented design, our solution can convert sea water into high quality drinking water at scale.
- 3. Ecolog has strategic partnership with an Australian academic institute to pursue its revolutionary low-cost, lightweight and highly portable solar energy solution.
  - With rapid manufacturing, inexpensive replacement, ease of integration into structural materials, buildings, combat ensembles, temporary facilities, vehicles or as retractable solar fields, the Ecolog Energy Solution™ is to unlock potential in a wide range of applications across energy, defense, humanitarian and commercial sectors. The solutionalso reduces the need for generators or battery airlifting in remote operations. Unlike most de-centralized energy infrastructure, which require considerable upfront investment, this energy-as-a-service (EaaS) solution by Ecolog is set to disrupt the energy business model and allows substantial growth in consumer base. Users could sign onto the Ecolog Energy Solution™ platform, where they determine their energy needs, customize the plan, pay a monthly service fee and power up. They do not need to pay for the infrastructure, equipment, installation, or even repair andreplacement.

### Measurement of outcome - Through effective monitoring & evaluation mechanisms.

- Ecolog has achieved compliance to the ISO 14001:2015 Standard from BSI (British Standards Institution) certifying that the Ecolog management system is in accordance with requirements of ISO 14001: 2015 for the following scope "The Management of Multi-Service Life Support for remote sites that includes: Facility Management; Camp Management (Cleaning, Maintenance, Laundry, etc.); Food service (Catering, Bakery, Food Warehousing); Logistics & Procurement (Food & Non Food); Supply Chain & Transportation (Land, Sea and Air); Warehousing (Food & Non Food); Compliance (Supplier & Products); Environmental Services Waste Management (Hard and wet), HAZMATManagement and Recycling, Water Manufacturing (potable and Non Potable); Operational Coordination".
- As part of Ecolog's Supplier Sustainability Program, we work with many suppliers and service providers and rely
  heavily on them to deliver the requirements we set with our clients. We conduct background checks on all our
  suppliers to ensure no risk are associated with their previous activities, in terms of environmental breaches by
  providing us reassurance that we are working with ethical companies.
   We continually invest in new technology to monitor hazardous and nonhazardous waste generation in our
  operations, either major or minor emissions.
  - In the Middle East, we processed over 12,500m3 of hydrocarbon contaminated solids for our clients utilizing efficient technology combining centrifuge and thermal desorption. The treatment standards for the output soil was: Total Hydrocarbons at <0.5 ppm as per TCLP method and Volatile Organic Compounds at <0.1 ppm and the measurements were carried out in accordance with United States Environmental Protection Agency (USEPA) 40 Code of Federal Regulations (CFR) Part 60 Appendix A test methods. Achieving such standards allowed the reuse of solids, as fill material, in the nearby port upgrade and reduction of hazardous landfill disposal of over 90% for total facility output.</p>
- Ecolog has never received any environmental citation or penalty in any of our operations which is testament to our ongoing monitoring and commitment towards environmental practices till date.

### Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

### Assessment, Policy & Goals

Ecolog endeavors to fully comply with all laws, rules and regulations applicable to its business and in the countries in which it operates – and in this regard, Ecolog supports the UNGC principle on anti-corruption having a zero tolerance policy for corruption in all its forms, including bribery and extortion. Ecolog aims to act in accordance with the anti-corruption laws which prohibit improper payments, specifically with respect to anti-corruption laws inclusive of UK's BriberyAct, US's Foreign Corrupt Practices Law and all other applicable anti-bribery and anti-corruption laws across the world

- Ecolog acknowledges that it is illegal to give, pay, promise, offer, or authorize the payment of anything of value, either directly or indirectly through a third party, to an official of a government or a representative of a commercial entity to obtain or retain business, or to secure any improper advantage, for Ecolog or one of its affiliates.
- Ecolog has a zero-tolerance policy towards its directors, officers, employees, and third parties acting on its behalf
  from offering or paying, directly or indirectly, any bribe to any employee, official, or agent of any government,
  commercial entity, or individual in connection with its business or activities enforced with an immediate and
  strictdisciplinary procedure.

Since Ecolog has ongoing business with many governments, public and private entities, and regularly has legitimate business interactions with government officials and company representatives, Ecolog provides thorough training and guidance to its employees using the following resources at the time of induction, operations and pre-deployment:

- · Vendor and transaction vetting, due diligence and background check;
- · code of business conduct and ethics;
- global hotline available 24/7 which provides the reporter with anonymity in 'whistle-blowing'; and
- · detailed training on anti-bribery and anti-corruption.

Ecolog updated its Anti-Bribery and Anti-Corruption Policy in April 2021 to reflect the evolving changes. Furthermore, Ecolog ensures strict adherence to the UN Supplier Code of Conduct in all of its UN-related contracts.

In 2022, Ecolog improved two additional polices:

- Charitable and Political Donations Policy Ecolog takes pride in its support of charities and good causes and is committed to conducting itself with the highest standards of probity in continuing to offer such support. This policy covers charitable and political donations made by Ecolog or on its behalf and our internal notification and record keeping requirements. This is to ensure that all donations are legitimate, properly recorded and do not improperly affect this organization. It sits alongside and should be read in conjunction with our Anti-Bribery and Anti-Corruption Policy, which is accessible to all and can be specifically requested from our legal and compliance department.
- Conflict of Interest Policy The relationship of the company with its employees should be based on mutual trust. As the company is committed to preserve the interests of people under its employment, it expects them to act only towards its own fundamental interests. This policy outlines the rules regarding conflict of interest and the responsibilities of employees and the company in resolving any such discrepancies.

### Code of Business Ethics & Conduct

In 2018, Ecolog embarked on a compliance project aimed at improving its code of business ethics and conduct to align it with evolving global ethical and compliance best practices for the current corporate industry environment.

Ecolog's Code of Business Ethics and Conduct ("Code") highlights our business conduct policies, guides us in how to deal with ethical and compliance issues, and explains where we can get help when we have questions or concerns.

The Code, and our core corporate values, guide us in delivering mission critical solutions to our clients around the world while doing it the right way. Each employee has the responsibility to comply with the code and to comply with the company's policies and procedures, and the laws and regulations in the countries we operate. We expect business partners and third parties, such as suppliers, agents, representatives, contractors, subcontractors, and consultants, who serve as an extension of Ecolog to conduct themselves according to our values and our Code.

As part of the re-launch, all employees underwent thorough and extensive mandatory awareness trainings on the Code and Ethics Hotline across all Ecolog offices and field locations, and provided their written undertakings to strictly abide by the Code in all their business practices.

After the re-launch, these trainings became part of our mandatory employee induction program that is continuously provided to all new employees. Due to the Covid-19 precautionary measures in place, such trainings are undertaken through telephone and video conference calls on a regular basis.

In 2020, Compliance Department announced the launch of the Ecolog Living Code, an employee-facing, interactive and customizable digital experience, built and designed as a microsite that provides easy access to users from anywhere.

The Living Code is an advanced "live" product, designed to capture the interest of personnel through a visually appealing interactive format that brings life to values, principles, and compliance topics from our Code of Business Ethics and Conduct. The main objective of this innovative and user friendly approach, is to provide a place where employees can quickly retrieve helpful and important guidance about ethical situations.

To access the Ecolog Living Code click here.

 $\underline{https://content.learn.saiglobal.com/LivingCode/ECO/LCbp01aECO/index.html}$ 

### **UN Supplier Code of Conduct**

In 2021-2022, Ecolog continued to provide its commitment to the United Nations by reaffirming its participation and member-ship with the UN Global Compact and submitting its third Communication on Progress (COP) report and maintaining a GC-Active reporting status level by highlighting various sustainability development measures that the company undertook through protection of human rights, upholding labour rights, being environmentally responsible, and by furthering anti-corruption principles.

The UNGC membership commitment - is appropriately supported with global training and staff acknowledgement programs thus ensuring our continued adherence to the UN Supplier Code of Conduct (a mandatory compliance requisite for all of our UN contracts).

This training is part of our mandatory employee induction program that is continuously followed by new employees.

### Implementation - Through Effective Management Systems

- Ecolog maintains signatory engagement with the UN Global Compact since May 9, 2018 (a voluntary initiative). https://www.unglobalcompact.org/what-is-gc/participants/132547-Ecolog-International.
- Ecolog's Code of Business Ethics and Conduct is posted on the company's portal and is familiarized to new joiners
  aspart of their orientation sessions through a formal mandatory training program.
   (<a href="https://secure.ethicspoint.eu/domain/media/en/qui/104564/code.pdf">https://secure.ethicspoint.eu/domain/media/en/qui/104564/code.pdf</a>).
- Ecolog's interactive Code of Business Ethics and Conduct ("Living Code") which is also available on a microsite linked to our corporate website can be accessed from the following link:\_
   <a href="https://content.learn.saiglobal.com/LivingCode/ECO/LCbp01aECO/index.html?lang=0&page=0">https://content.learn.saiglobal.com/LivingCode/ECO/LCbp01aECO/index.html?lang=0&page=0</a>
- "TRACE has completed a TRACE certification due diligence review of Ecolog in 2020 and 2021. Certification by
  TRACE signifies that Ecolog International FZE has completed internationally accepted due diligence procedures and
  has been forthcoming and cooperative during the review process. TRACE certification underscores Ecolog's
  commitment to transparency in international commercial transactions."

Review our full TRACE Certified due diligence report at <a href="https://tpms.traceinternational.org/IntermediaryDirectory">https://tpms.traceinternational.org/IntermediaryDirectory</a> by searching for [Ecolog International FZE].

Currently Ecolog is in the process of recertifying with TRACE for the period 2022-2023, which again reflects our continuous commitment to integrity and transparency in all our business transactions.

### Ecolog Compliance Framework

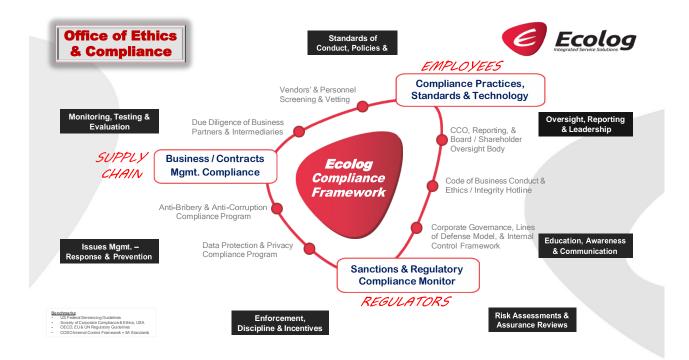
Ecolog is committed to ethical business practices and to obeying both the spirit and letter of the law in every country in which it does business. Ecolog takes its legal and organizational responsibilities to prevent regulatory non-compliances seriously and expects all its employees/entities to do the same.

Ecolog has a designated Head of Compliance ("HoC") to implement a well governed and compliant culture (in adherence with all local, national and international laws and regulations), while:

- benchmarking with global compliance standards and regulatory guidelines;
- · focusing on 'prevention, detection and response (remediation)' compliance protocols;
- leading and interfacing with management/regulators/clients to address potential areas of regulatory and global business compliance vulnerabilities and risks; and
- adequately resourcing the compliance function to ensure success of deliverables, maintaining the required skills and competencies.

Ecolog Compliance Framework: designed and benchmarked with the global compliance standards and guidelines:

- Written standards of business conduct and compliance policies & procedures.
- Top management level visible commitment: Designation of a Head of Compliance with adequate resources &authority, and institution of a governing oversight body.
- Effective compliance awareness, training, education and communication.
- Regular audits, monitoring and evaluation techniques to provide independent and objective assurance to management (including external stakeholders).
- Establishment of reporting processes and procedures for compliance complaints.
- · Appropriate enforcement, disciplinary and incentive mechanisms.
- Investigation and remediation of systemic problems (response & prevention).



### Internal Controls

Ecolog has adopted and continues to implement good internal controls, systems and processes, to integrate its anti-bribery and anti-corruption principles, and compliance philosophies with day-to-day business activities:

- Enterprise Resource Planning (ERP) system and signatories with defined segregation of duties and multiple approval layers for key processes and transactions in line with the 4-eyes principle.
- Procurement and Expenses: All purchases and expenses are undertaken using the procure-to-pay process, embedded in the SAP software through approved purchase orders and/or contracts (as per defined level of authority). Further, detailed 'Travel and Expenses Reimbursement' policy and SOP is also in place.
- Ecolog ensures that the necessary anti-bribery and anti-corruption provisions are enshrined in all its contractual agreements with all of its stakeholders including, but not limited to client contracts, goods and/or services with subcontractors and/or consultants, and employment contracts.
- Vendor Selection: Ecolog uses reputable third party databases and applies online politically exposed person and denied party (PEP/DP) screening processes, prior to establishing any contractual and business relationships with its business partners.
- Payments: Adequate internal controls are in place to process the payments and funds transfer i.e., three-way
  matching, approval authorities, segregation of duties, etc. Appropriate processes are in place and improvements
  being made for review, approval and reconciliation of cash payments and expenses.
- Personnel Screening: Ecolog implements personnel background screening procedures for new hires and employs a reputable third-party service provider to screen all senior appointments and hires.

### Measurement of Outcome - Through Effective Monitoring & Evaluation Mechanisms.

• Ecolog has setup a "Global Ethics and Integrity Hotline" where employees can report any ethical issues by telephone or web-portal under anonymity. (<a href="https://secure.ethicspoint.eu/domain/media/en/gui/104564/index.html">https://secure.ethicspoint.eu/domain/media/en/gui/104564/index.html</a>). During the reporting period, a total of 10 cases were reported through Ethics Hotline web portal. All cases were investigated promptly and closed in due time with the appropriate remedial measures.

### **Global Ethics & Integrity Hotline**

Ecolog is committed to an environment where open, honest communications are the expectation, not the exception. Employees can feel comfortable in approaching their supervisor or management in instances where they believe violations of policies or standards have occurred. In situations where employees prefer to place an anonymous report in confidence, they are encouraged to use the multilingual Global Ethics Hotline (toll-free), hosted by a third party hotline provider, available 24/7 (across 17 countries) and through an online reporting system accessible toeveryone (company website / portal).

Ecolog adopts a non-retaliation policy to protect employees who report misconduct in good faith - the company will suitably conduct an investiga-

tion in compliance with applicable laws - taking appropriate corrective actions for proven compliance / code violations.

### Internal Controls

In addition to its including in the Code of Business Ethics and Conduct and corporate website, the Ecolog's Global
Ethics and Integrity Hotline is continuously and adequately communicated to all its employees through trainings
and awareness posters that have been posted across more than 100 locations-points across all Ecolog global
sites and offices.







- Quarterly Compliance Updates were provided to Management Board, and 40+ management team members underwent online anti-bribery training with an international service provider in 2018.
- On annual basis, internal controls, transactions and underlying supporting documents are reviewed and assessed by our external auditors (a reputable big 4 audit firm) from the perspective of anti-bribery and anti-corruption compliance inclusive of all other regular audit procedures.

### About this Report



Since 2018, Ecolog International FZE has been committed to the UN Global Compact corporate responsibility initiative and its principles in the areas of human rights, labor, the environment and anti-corruption.

This COP Report (Ecolog\_UNGC\_COP#4/2022 (MAY 2021 - APRIL 2022)) delivers relevant highlights of initiatives, activities and progress that Ecolog is undertaking on a global basis to address UNGC principles on human rights, labor, the environment and anti-corruption. The report covers the period between May 1, 2021 and April 30, 2022.

For all enquiries related to this report, please contact Mr. Erdogan Halimi, Head of Compliance (Compliance@ecolog-international.com), Ecolog International FZE.

This report will be published on the UN Global Compact website and the Ecolog corporate website.



Ecolog is a leading provider of Logistics, Supply Chain, Facilities Management, Engineering, Oil & Gas, Energy, Environmental Solutions, Infrastructure, Industrial and Healthcare Services. We provide turnkey and customized solutions to governmentsand defense, humanitarian organizations and commercial clients in the sectors of Government Contracting, Defense, Oil &Gas, Mining, Energy, Infrastructure and Healthcare. Ecolog has built long lasting partnerships with organizations such as the US Army, NATO, German Army (Bundeswehr), EUFOR, and UN. Additionally, Ecolog works with major peacekeeping missions including MINUSMA, MINUSCA, UNSOM, UNMISS, UNSOS, Ministry of Defense of United Kingdom, and other countries including The United States of America, Germany, France, as well as private international companies.

Headquartered in Dubai (UAE) and incorporated almost two decades ago, Ecolog has carried out over 1,100 projects and is now active in nearly 50 countries by providing mission critical support services in a wide range of environments, including some of the world's most remote and challenging locations. For more details about Ecolog, visit:

www.ecolog-international.com



