

ENVIRONMENTAL POLICY

of usd AG

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Date 06.08.2024
Classification Public (V0)

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Preamble

Corporate social responsibility (CSR) is the social responsibility of companies in terms of sustainable business. The three pillars of sustainability encompass social, ecological and economic aspects, such as fair business practices, employee-oriented HR policy, economical use of natural resources, serious local commitment and protection of the climate and environment. usd is committed to the ten principles of the UN Global Compact for responsible and sustainable corporate governance and to the 2030 Agenda for Sustainable Development adopted by the member states of the United Nations in 2015. At the heart of the agenda are 17 global Sustainable Development Goals. At usd, we have prioritized five of the goals. SDG 13 “Climate action” is therefore one of our focus topics. The following guideline describes the principles and requirements to which the Executive Board, management and employees of usd are committed in this context.

1. General information and principles

1.1 Purpose of the policy

This guideline forms the framework for our environmental management. It describes our goals and initiatives to protect the environment and the climate (focus on SDG 13 “Climate action”) and at the same time defines requirements and our internal organization. Our environmental and climate protection concepts address both our own company and our obligations to external partners. Internally, the content is also intended to serve as a guide for all employees and create a lasting awareness of the issue of environmental protection outside of working life as well.

1.2 Competencies and responsibilities

The Executive Board of usd has overarching responsibility for environmental management and, as part of its strategic corporate planning, also approves the objectives and the associated environmental management measures required. Responsibility for the implementation, content and monitoring of compliance with defined measures has been transferred to the Compliance & Legal organizational unit, represented by Executive Board member Andrea Tubach. Responsibility for the operational implementation of the requirements defined in the environmental management system lies with the divisional management of the respective usd business and central divisions. They are responsible for actively supporting the implementation of measures, writing them down in internal process documentation and, in particular, complying with and driving forward the implementation of the defined measures within their own division. The key performance indicators (KPIs) defined and monitored in this context are transferred once a year to the CSR management system, which is consolidated in the Compliance & Legal organizational unit.

Significant deviations from agreed environmental management targets during the year are also communicated to the Compliance & Legal organizational unit outside of the annual reporting cycle. As part of a structured decision-making process, a decision is made as to whether additional measures or adjustments to the adopted plan will be made during the year, taking into account the severity of the deviation and its impact on stakeholders.

The organizational unit is supported by the internally founded Responsibility Circle, which consists of a community of employees from different divisions who are actively involved in improving the environmental awareness of employees and implementing various approved measures and projects each year.

1.3 Validity and review

This Environmental Policy is valid for all usd locations and their employees. It is reviewed and adjusted annually if one of the following conditions is met:

- Changes to important references and underlying standards.
- New findings on existing and insufficiently addressed environmental aspects.
- Changes in the requirements of relevant stakeholders (e.g. clients, suppliers) that are addressed by the usd Code of Ethics and Conduct.

1.4 Obligation to comply with laws

usd complies with statutory requirements and legal obligations wherever it does business. In addition, we act in accordance with the precautionary principle in our current and future business activities.

2. usd environmental management

2.1 Environmental policy of usd AG

Responsible conduct plays a fundamental role in all divisions of usd - for us, our clients and partners, but also beyond that. "We are among the good guys" is one of the guiding principles of our Code of Ethics. The well-being of future generations and, as a fundamental part of this, environmental protection is therefore an important component of our corporate philosophy.

We are committed to carrying out our activities in harmony with the environment and nature and to making our business activities sustainable for future generations. As part of usd's environmental management, we continuously analyze all aspects of our operations for potential improvements for the benefit of the environment, in line with the profitability of usd.

usd and its employees have set themselves the goal of becoming a climate-friendly organization by

- protecting and maintaining the natural foundations of life,
- fulfilling all binding obligations,
- continuously improving our environmental management and
- anchoring environmental protection as a matter of course in everyone's thoughts and actions.

For many of our clients, environmental awareness is an important factor when selecting contractual partners. We try to meet this requirement and always aim to implement all customer-relevant specifications in the best possible way and, if possible, to exceed them.

As an employer, we rely on our employees taking a high degree of personal responsibility in all matters. This also applies to the divisions of environmental protection. All employees are integrated into our management system and have the right and duty to work towards avoiding unnecessary environmental pollution in their daily work.

2.2 Climate change and energy

Climate protection is one of the central fields of action of the CSR strategy. This is also reflected in the focused goals mentioned in the preamble. SDG 13 requires immediate action to combat climate change. COVID-19 has led to an improvement in digitalization, which will lead to a sustainable reduction in emissions.

2.3 Natural resources and the circular economy

We use the technical and economic possibilities to continuously reduce the environmental impact and consumption of resources. Our use of resources is therefore always based on the aspects of economy, environmental compatibility and recyclability. Together with our partners, we have created solutions for the operation of our sites that regulate the economical use of resources. We see environmental protection as an important management task. Our employees receive annual awareness training on relevant environmental protection topics and are motivated to use resources sparingly. The aim is to continuously integrate a further measure for the environmentally friendly use of resources each year through our reporting and ideas management process and in cooperation with the Responsibility Circle.

2.4 Sustainable products

Sustainability is important to us when selecting the products we buy. We avoid unnecessary packaging and plastics and rely on reusable or compostable materials. We also cover our office supplies in an ecologically responsible manner. We use devices with low energy consumption and use digital signatures wherever possible.

2.5 Supplier standards

Wir beziehen unsere Vertragspartner in unsere Aktivitäten zum Umweltschutz ein, kommunizieren transparent, wie wichtig uns umweltbewusstes Handeln ist und berücksichtigen daher auch im Beschaffungsprozess definierte Umweltaspekte. Gemäß unseren Vorgaben aus der Einkaufsrichtlinie verpflichten sich unsere Vertragspartner auf die Einhaltung des usd Ethik- und Verhaltenskodex. Als kritisch eingestufte Neulieferanten sind darüber hinaus verpflichtet, über den usd Lieferantenfragebogen u.a. nähere Informationen hinsichtlich der eigenen Bemühungen im Umweltmanagement aufzuzeigen. Einmal im Jahr wird darüber hinaus der Status der Umsetzung des Umweltmanagements bei relevanten Dienstleistern der usd abgefragt.

3. KPI und Nachvollziehbarkeit

Die Betrachtung und Messung von Nachhaltigkeits-KPIs erfolgt auf verschiedenen Ebenen. Die usd hat kein produzierendes Gewerbe. Daher konzentrieren wir uns im Rahmen des usd Umweltmanagements im ersten Schritt bei unseren Kernprozessen auf relevante Vorgänge in der Auftragsbearbeitung und konkret der Erbringung der Dienstleistung bei unseren Kunden. Dienstreisen stellen einen der größten Posten der CO2 Emissionen der usd dar. Mit diesem Hintergrund wurden konkrete Maßnahmen definiert, welche die hieraus entstehenden CO2 Emissionen reduzieren bzw. kompensieren sollen. Ab dem 1. Juli 2024 wird bei jeder Flugbuchung, sofern die Möglichkeit durch die Fluggesellschaft besteht, der CO2 Ausstoß, durch entsprechende Mehrzahlungen mindestens anteilig kompensiert. Inlandsflüge zu dienstlichen Zwecken sind gänzlich untersagt. Ziel ist es, bei mindestens 80 % der dienstlichen Flugreisen eine der angebotenen CO2 Kompensationsmöglichkeiten der jeweiligen Fluggesellschaft in Anspruch zu nehmen. Darüber hinaus sind unsere Mitarbeiter*innen angewiesen, sofern möglich, zu unseren Standorten bzw. Kundeneinsätzen klimafreundlich mit öffentlichen Verkehrsmitteln oder gemieteten Elektrofahrzeugen anzureisen. Darüber hinaus betrachten wir Support-Prozesse, welche unseren Kernprozess unterstützen, aber selbst keinen direkten Kundennutzen erzeugen. Im Fokus steht in diesem Kontext die usd Infrastruktur, welche sich zum Ziel gesetzt hat, den Lebenszyklus von IT-Equipment insoweit zu verlängern, dass IT-Equipment so lange verwendet wird, bis es sicherheitstechnisch nicht mehr zu verantworten ist bzw. funktionsfähige Alt-Hardware zu spenden. Die dritte Dimension, die Messung der Nachhaltigkeitsleistung in der

vorgelagerten und nachgelagerten Wertschöpfungskette, betrachten wir im Rahmen unseres Einkaufsprozesses.

4. Kontinuierliche Verbesserung

Im Rahmen des jährlich stattfindenden Management-Reviews der bei der usd umgesetzten Management-Systeme (aktuell: Informationssicherheitsmanagementsystem nach ISO 27001, Qualitätsmanagementsystem nach ISO 9001) ist seit dem Jahr 2022 ein Review des CSR-Managementsystems integriert, welches unter anderem eben auch eine Berichterstattung aus dem usd Umweltmanagement enthält.

Zudem ist über den Responsibility Circle heute bereits ein interner Melde- und Ideenmanagementprozess etabliert, der nach Freigabe des Vorstands im Rahmen der monatlich stattfindenden Sitzungen auch Ad-hoc Maßnahmen möglich macht.