

Swiss4net Holding AG Environmental, Social and Governance (ESG) Policy

1. Introduction

The Board of Swiss4net Holding AG recognizes that environmental, social and governance (“ESG”) issues have a material effect on the performance of the company and its subsidiaries (the “Group” or “Swiss4net”). Our aim is to ensure that such issues are considered at all levels of the Group’s business activities, and in accordance with International and National Codes and Principles.

Specifically, Swiss4net aims to achieve this by:

- Ensuring that our vision and ESG objectives are relevant, understood and communicated and that our employees demonstrate alignment to them.
- Identifying all material ESG risks in the business activities undertaken by Swiss4net companies and ensuring that the risks are fully considered and managed in a responsible and ethical way.
- Ensuring that key decisions are only taken after full consideration of all material ESG issues and risks.
- Setting targets for environmental, social and governance matters which will be reported, monitored, reviewed and disclosed to our stakeholders.
- Adopting high standards of governance and ethics in our business code of conduct.
- Providing appropriate information, instruction and training and ensuring that this policy is communicated to all persons working for Swiss4net companies.
- Working together with our customers, suppliers and business partners to encourage them to adopt the principles or similar policies resulting in the same outcomes.
- Aspiring to achieve benchmark levels in environmental, social and governance performance and making these themes core to what we do.

2. ESG Specific Commitments

Environmental

- Committing to the protection of the environment through continuously reducing the environmental footprint of our business by choosing sustainable and accurate material sourcing and developing a sustainable supply chain by ensuring resource efficiency.
- Encouraging all staff to consider the environmental consequences of their actions and to seek to minimise the impact where reasonably practicable.
- Continuously monitoring how the evolution (monthly Management-report) of the Swiss4net business practices could impact the environment and how the environmental impact of new business practices can be mitigated.

- Consideration and monitoring of key environmental metrics material to the Group, including energy consumption, % of energy sourced from renewable sources, greenhouse gas emissions (CO₂), physical risks, water and waste consumption.

		Energy Consumption		
Entity	Unit	mm.yyyy	yyyy YTD	per active user
A	kW/h			
B	kW/h			
C	kW/h			
TOTAL	kW/h			

100% of energy obtained from renewable sources.

- Contribute to the United Nations Sustainable Development Goals:
 - SDG 9 “Industry, Innovation and Infrastructure” through roll-out of fibre networks in areas of very low connection speeds to increase speeds and bandwidths available to consumers, to provide more resilient, energy efficient connectivity.
 - SDG 12 “Responsible Production and Consumption” as the Group’s roll-out focuses on less densely populated areas to help bridge the gap in connectivity discrepancies between rural and dense urban municipalities in Switzerland.
 - SDG 13 “Climate Action” by minimising the climate impact of data transmission through less energy consumption and reduction in greenhouse gas emissions by transitioning from copper and cable networks to fibre optic.
- Swiss4net has no industrial production facility that produce greenhouse gases into the atmosphere or any production of materials used that result in GHG (Green House Gases) emissions upstream the value chain. The energy Swiss4net buys to run its operations is green and renewable and there is no product which requires the consumption of fossil fuels.
- For Swiss4net there are no policy risks identified, for example as a result of energy efficiency requirements, carbon-pricing mechanisms which increase the price of fossil fuels, or policies to encourage sustainable land use. No legal risk was identified either, for example the risk of litigation for failing to avoid or minimise adverse impacts on the climate, or failing to adapt to climate change, were detected neither. Swiss4net does not use any technology that has a damaging impact on the climate. Therefore, market and reputation risks are rarely existing for Swiss4net’s business model.
- Swiss4net is well aware of physical risks, which arise from particular events, especially weather-related events such as storms, floods, earthquake, avalanche, fires or heatwaves, that may damage ducts and buildings. According insurances are in place too. Chronic physical risks, which arise from longer-term changes in the climate, such as temperature changes, rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity, are considered as well.

Social

- Recognising that open access fibre networks contribute positively to reduce the overall digital divide and thus increase social cohesion over a territory.
- Encouraging a culture of diversity, equity and inclusion with the highest ethical standards, respect human rights, promote gender equality and act against incidents and grievances in a systematic manner.
- Supporting a culture in which all employees are valued and respected.
- Promoting the Group's commitment to the wider society and community development.
- Continuously monitoring how the evolution (monthly Management-report) of the Swiss4net business practices could impact social matters and how new business practices can be carried out in a socially acceptable way.
- Adhering to the Group's policy on Health and Safety to ensure adequate control of health and safety risks in order to prevent any incidents occurring in the workplace or through any of the Group's operations for our employees and supply chain.
- Reporting on H&S incidents regularly through monthly board reporting.

Metric	mm.yyyy			Targets	
	Month	LTM*	YTD	2021	Long-term**
Fatalities					
Reportable injuries					
Lost Work Days					
Lost time injury frequency rate					
Total recordable incident rate					

* last twelve months

** based on xxx employees incl. sub-contractors

- Swiss4net holds a Stakeholder Engagement Plan which is updated on a yearly basis which is applicable to Swiss4net and its subsidiaries for a fibre network in a given municipality.
- Swiss4net ensures satisfaction towards all its external and internal stakeholder partners.

Governance

- Ensuring compliance with regulations and guiding principles governing the protection of human rights, operational and occupational health and safety, environmental and business practices in the jurisdictions in which we operate.
- Identifying the relevant legislative and regulatory requirements and ensuring that fibre networks are compliant with these requirements, and where practicable meeting them in an environmentally responsible manner.
- Ensuring appropriate mitigation measures and procurement of relevant IT software to minimise the risk and impact of cyber security breaches.
- Adopting the highest standards of governance and ethics of business conduct and practice.
- Maintaining a Senior Management open door policy allowing employees to raise any breaches of standards, policies or values.
- Ensuring the Board of Directors have oversight of all ESG matters and key decisions through monthly Company Board meetings where ESG will be an agenda item.
- Continuously monitoring how the evolution (monthly Management-report) of the Swiss4net business practices could impact existing governance rules and how

governance rules need to be changed in order to accommodate new business practices.

- Swiss4net maintains several policies to ensure correct behaviour in all areas, such as Anti Bribery Fraud Prevention, Code of Conduct, Information Security & Cyber Security Policy as well as a Treasury Policy. All our policies are annually reviewed by the Board of Directors.

3. Other ESG Matters

Reporting, Disclosure and Communications

Environmental, Social and Governance risks and opportunities are addressed monthly at board meetings. Swiss4net monitors and reports key ESG metrics on a monthly basis. These metrics include energy consumption, the % of energy sourced from renewable sources, injuries and fatalities, water and waste consumption, grievances from stakeholders, fraud attempts, and any other board-level or operational issues. Serious incidents, injuries and fatalities are reported to board members as soon as they occur and become known.

Swiss4net also reports annually on the top 5 risks to the business and any actions taken or required to mitigate these risks. The Swiss4net board devises an annual stakeholder engagement strategy for the year ahead which identifies key opportunities and methods of communication with stakeholders.

Training

Annual ESG training is completed by those within the organisation who are responsible and have an oversight of ESG matters as part of their role.

Diversity, Equity & Inclusion (DEI)

Swiss4net is committed to encouraging a supportive and inclusive culture among the whole Swiss4net team. We want and create a working environment which supports our values, and which is free from any form of discrimination, bullying or harassment and where all individuals are treated with respect, fairness and consistency. In addition, Swiss4net is committed to Gender Equality and reduced inequalities. This policy reinforces our commitment to providing equality and fairness to everyone at Swiss4net and to not provide less favorable facilities or treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, ethnic origin, colour, nationality, national origin, religion or belief, sex and sexual orientation, social or educational backgrounds.

Net Zero

As part of our responsible corporate citizenship, Swiss4net is committed to have net zero scope 1 and 2 Green-House Gas (GHG) emissions by 2050 in line with a 1.5-degree temperature increase limit scenario. For scope 3 emissions that result from upstream and downstream activities, Swiss4net will continue to influence and support reduction of emissions. To ensure a transparency Swiss4net will annually report scope 1, 2 and material scope 3 emissions in line with the GHG Protocol to the board and our shareholders. This

commitment is further reflected in our support of SDG 9: Industry, Innovation and Infrastructure and SDG 13: Climate Action.

Scope and Application

Direction and oversight of the Environmental, Social and Governance Policy is the responsibility of the Board of Directors which has delegated day-to-day management responsibility to the Managing Director of the Swiss4net Group.

This Policy applies to all Swiss4net companies.

This Policy will be updated annually.