

Corporate Social Responsibility Policy

Classification: Public

Corporate Social Responsibility (CSR) Policy Statement

New Era Technology and its subsidiaries (the “Company” or “New Era”) operate in a wide range of legal and business environments. The purpose of this Corporate Social Responsibility Policy (the “Policy”) is to encourage and enable directors, officers and workers of the Company, including independent contractors in the United States and other countries as applicable to the extent they are covered by relevant local laws and legislation in relation to this Policy (for these purposes, each shall be referred to as an “Employee”), to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

We acknowledge that running our business affects society. In particular, we have a responsibility to our clients and Employees as well as the broader community in which we operate.

The Company is committed to taking responsibility for our actions and encourage a positive contribution towards improving standards for our clients and Employees, minimizing our impact on the environment, and improving the quality of the local community.

By putting CSR into practice, New Era Technology is committed, wherever possible, to:

- Conducting ourselves responsibly and in an ethical manner.
- Creating a positive and supportive working environment.
- Supporting local communities.
- Improving service levels for clients.
- Acting fairly in our dealings with suppliers and other third parties.
- Minimizing the impact on our environment.

The Company will:

- Respect the law.
- Honor its internal policies.
- Ensure that all its business operations are legitimate.

New Era Technology will always conduct business with integrity and respect for human rights. The Company will promote safety and fair dealing, respect toward the consumer and anti-bribery and anti-corruption practices.

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1. Terms and Definitions

Term / Acronym	Definition / Meaning
“Employee”	Directors, officers and workers of the Company, including independent contractors in the United States and other countries as applicable to the extent they are covered by relevant local laws and legislation in relation to this Policy.
“ESG Committee” or “Environmental, Social and Governance Committee”	Includes, but is not limited to, representatives from Human Resources, Corporate Development and GRC (Governance, Risk and Compliance) teams.
“Corporate Social Responsibility” or “CSR”	Corporate social responsibility is a type of business self-regulation with the aim of social accountability and making a positive impact on society. Some ways that a company can embrace CSR include being environmentally friendly and eco-conscious; promoting equality, diversity, and inclusion in the workplace; treating Employees with respect; giving back to the community; and ensuring business decisions are ethical ¹ .
“we”, “our”, “New Era”, “New Era Technology”, “us” or “Company”	Refers to New Era Technology and its subsidiaries.

2. Scope

This Policy applies to all New Era Technology Employees, regardless of location (within or outside of the jurisdictions in which the Company operates).

We may have additional supplementary regional CSR policies that could address legislation specific to that country and/or region.

This Policy does not form part of any Employee’s contract of employment, and New Era reserves the right to amend the Policy at any time.

3. Roles and Responsibilities

This Policy has been agreed upon and implemented following review and approvals from New Era Technology’s executive leadership team.

This Policy has been ratified by the New Era Board of Directors.

The Chief Administrative Officer (CAO) has overall responsibility for the effective operation of this Policy. The CAO has delegated responsibility for overseeing the implementation of the Policy to representatives from

¹ <https://www.businessnewsdaily.com/4679-corporate-social-responsibility.html>

the Human Resources, Corporate Development and Governance, Risk & Compliance (GRC) teams ("ESG Committee"). Suggestions for changes to this Policy should be reported to GRC@neweratech.com.

Line managers have day-to-day responsibility for enforcing this Policy, and Employees should refer any initial questions about this Policy to line managers.

This Policy is reviewed annually by members of the ESG Committee. Changes may be made at any time as government guidance develops.

4. Our Company CSR Principles

At New Era Technology we recognize that we must integrate our core business values (community, integrity, agility, and commitment) and operations to meet the expectations of our clients, in relation to customers, Employees, the community and the environment.

Our Conduct

Our Code of Conduct serves as a foundational framework for ethical behavior, legal compliance, and responsible business practices across all operations and geographies. We actively promote respect between our staff members in their dealings with each other and with clients and other third-parties.

New Era aims to adopt the highest professional standards and not to act in such a way as to compromise the Company's integrity:

- **Integrity & Ethics:** Act with honesty, fairness, and transparency. Avoid conflicts of interest, bribery, and misuse of confidential information.
- **Legal Compliance:** Follow all applicable laws and regulations, including labour, data protection, competition, and environmental standards.
- **Human Rights & Inclusion:** Promote equal opportunity, respect diversity, and prevent discrimination, harassment, and exploitation.
- **Health & Safety:** Maintain a safe and respectful workplace. Prevent violence, bullying, and misuse of company assets.
- **Environmental Responsibility:** Minimize environmental impact through sustainable practices and responsible resource use.
- **Governance & Accountability:** Ensure accurate records, ethical leadership, and strong risk management.
- **Confidentiality & Data Protection:** Safeguard sensitive information and comply with data classification and privacy policies.
- **Gifts & Business Courtesies:** Avoid undue influence. Gifts and entertainment must be modest, infrequent, and properly disclosed.

Ethical Innovation & Technology Governance

We commit to developing, implementing, and overseeing services and solutions that respect human rights, promote fairness, and avoid harm.

Responsible AI & Automation

- Employ methods that promote transparency, explainability and auditability in AI systems wherever feasible.
- Avoid algorithmic bias by implementing diverse data sets and inclusive design.
- Conduct risk assessments for any AI and automated systems.

Data Privacy & Protection

- Uphold GDPR, CCPA, and other global data protection standards.
- Where applicable, design systems and services with privacy-by-design and privacy-by-default principles.
- Empower users with control over their data through clear consent mechanisms.

Cybersecurity & Digital Trust

- Maintain robust cybersecurity protocols to protect users, systems, and infrastructure.
- Report vulnerabilities transparently and collaborate on threat mitigation.
- Promote digital resilience through Employee awareness training.

Human-Centered Design (where & if applicable)

- Prioritize accessibility and usability for all users, including those with disabilities.
- Avoid manipulative design patterns (e.g., dark patterns) that undermine user autonomy.
- Engage end-users in co-design and feedback loops.

Ethical Use of Emerging Technologies

- Apply precautionary principles to technologies like biometrics, neurotech, and quantum computing.
- Avoid surveillance practices that infringe on civil liberties.
- Encourage ethical sourcing and disposal of hardware components.

Our Working Environment, Employee Wellbeing & Diversity

The Company maintains an Employee Handbook in the regions in which we operate, setting out the rights and expectations of all members of staff.

We recognize that our staff members are our most important resource, and we actively seek to offer our Employees a positive and healthy working environment; to ensure that they have rewarding careers and job satisfaction. We will support our Employees as it pertains to their safety, health, and wellness.

We abide by local health and safety regulations in the regions in which we operate to ensure the safety of our Employees and the environment in which they are working.

We seek to ensure that all members of staff have access to the training they need both for their own development and to enable them to deliver a high-quality service. Managers are responsible for identifying, with staff, as applicable, any additional training required or requested and managing approvals with Human Resources.

We are committed to engaging with our Employees to provide a challenging, dynamic, inclusive and diverse work environment that supports their professional development, as well as promoting a good work-life balance that prioritizes their overall health and wellness. We consider all Employees to be equal, and we aim to create a working environment which is free of unlawful discrimination. In this regard, we maintain an Equality, Diversity & Inclusion Policy.

We will preserve and promote the protection of human rights and welfare within our own business activities, as well as those of our supply chain, in accordance with our Code of Ethics and Business Conduct and our Modern Slavery (Anti-Slavery and Trafficking) Policy.

Our Community

New Era will support initiatives that benefit the environment, human welfare, and education. This includes skills training that advances workforce talent pipelines for our customers and economic development in the communities in which we operate.

In considering our impact on the community, the Company has resolved to sponsor or otherwise support local charities per our Employee Community Volunteer Policy. We allow New Era staff members up to one day a year of paid time off to enable them to carry out charitable work in support of their chosen charity and to encourage dialogue with local communities and groups for mutual benefit.

Our Clients

New Era Technology is committed to delivering a high level of service to all our clients. We understand that our business exists in a very competitive market and in order to retain our clients we need to deliver a professional and courteous service.

New Era's success depends on our customer relations; it depends on the quality of the relationships between New Era, our Employees, and the general public.

Our client's interest and willingness to do business with New Era is greatly influenced by their representatives who deal with us.

We, as Employees, also represent New Era, and therefore, to our clients, we are each an ambassador of the Company.

Suppliers

New Era committed to acting lawfully, ethically and to promoting equality and diversity in all our professional dealings with supplier and other third-parties in accordance with our Equality, Diversity & Inclusion Policy.

We endeavor to enter into clear and fair contracts with our suppliers and are committed to fulfilling our obligations within those contracts.

Wherever possible, we aim to support the local economy by contracting with local suppliers.

Furthermore, New Era expects our suppliers to share our commitment to their employees and supply chain in supporting their employee and supplier safety, health, and wellness; to comply with their own codes of conduct, including, but not limited to, acting lawfully, ethically and in line with local legislations as it pertains to anti-discrimination; modern slavery; anti-corruption; environmental legislation; and health and safety.

Environment

New Era is committed to behaving responsibly and to minimizing our impact on the environment and we will encourage our clients to join us in this effort. In this regard, we maintain an Environmental, Social and Governance (ESG) Policy and Environmental Sustainability Policy.

When we can identify the opportunity, New Era will participate in measures to drive down our energy and carbon impacts.

We consider environmentally sustainable initiatives in our pursuit to deliver near-term efficiency, value, and health for our business, our people, and the wider community; we endeavor to be a digital-first business.

New Era, in striving for continuous improvement and to comply with current environmental legislation, will work to continue to minimize the impact of our activities on the environment including working with our suppliers to ensure alignment with, and compliance to, sustainability and environmental practices.

5. Compliance, Monitoring and Enforcement

This Policy is intended for all New Era businesses, in all countries.

New Era Technology seeks to proactively prevent and mitigate instances of non-compliance with this Policy.

Any breaches or concerns, including ethical concerns or potential breaches in our commitment to high ethical standards, should be reported as soon as possible through our Whistleblowing Policy.

New Era Technology's ESG committee is responsible for monitoring the effectiveness of this Policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this Policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to GRC@neweratech.com.

6. Acknowledgment

Those in receipt of this New Era Technology Policy acknowledge its receipt and understanding of its contents; and that New Era Technology expressly reserves the right to change, modify, or delete its provisions without notice.

7. Document Information

Reference	ESG Framework
Title	Corporate Social Responsibility Policy
Purpose	The purpose of this Policy is to communicate New Era Technology's commitment to taking responsibility for our actions and encourage a positive contribution towards improving standards for our clients and Employees, minimizing our impact on the environment and improving the quality of the local community.
Owner	Chief Administrative Officer (CAO)
Document Approvers	ESG Committee
Intended Audience	New Era Technology permanent, temporary, and contracted staff and in certain instances, independent contractors; New Era Suppliers and third parties.
Review Plan	Annually
Document Classification	Public

8. Document History

VERSION CONTROL			
Revision	Date	Record of Changes	Released/Released By
V1.0	Jan 2024	Approved release	ESG Committee
V2.0	Sep 2024	Document owner/approvers updates	ESG Committee
V3.0	Nov 2025	Annual review; statement updates; owner/approvers updates	ESG Committee

9. Control of Hardcopy Versions

The digital version of this document is the most recent version. It is the responsibility of the individual to ensure that any printed version is the most recent version. The printed version of this document is uncontrolled, and cannot be relied upon, except when formally issued by a member of the ESG Committee and provided with a document reference number and revision in the fields below:

Document Ref.	Rev.	Uncontrolled Copy	X	Controlled Copy
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10. References

Standard / Framework / Other	Title	Description
Corporate Policy	Employee Handbook	Code of Ethics and Business Conduct: a set of rules that details New Era's values, ethics, and beliefs including the rules that govern legal compliance.
Corporate Policy	Employee Handbook	Policies, in addition to the Code of Ethics and Business Conduct, including but not limited to Equal Employment Opportunity policy; Anti-Discrimination And Anti-Harassment Policy; "Whistleblower" Protection policy; Anti-Retaliation policy; Complaint Procedure; Open Door Policy; Standards of Conduct; Electronic Information and Communications policy; Confidential Information policy; Customer Relations policy.
Corporate Policy	ESG Policy	The purpose of this policy is to provide information about ESG (Environmental, Social and Governance) factors and to encourage the business to understand ESG better.
Corporate Policy	Anti-Bribery & Anti-Corruption Policy	The purpose of this policy is to set out the responsibilities of New Era and those who work for us about observing and upholding our zero-tolerance position on bribery and corruption. The policy is also intended to act as a source of information and guidance for those working for New Era. It helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.
Corporate Policy	Modern Slavery (Anti-Slavery and Human Trafficking) Policy	The purpose of this policy is to ensure New Era's compliance with obligations under the Modern Slavery legislation, reducing modern slavery risks posed to the business.
Corporate Policy	Equality, Diversity & Inclusion Policy	The purpose of this policy is to: <ol style="list-style-type: none"> 1. Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense. 2. Create a working environment free of bullying, harassment, victimization and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all Employees are recognized and valued.
Corporate Policy	Whistleblowing Policy	Ensures that an Employee can raise concerns about wrongdoing or misconduct within New Era without fear of victimization, subsequent discrimination, disadvantage or dismissal.