

Columbus[®]

Sustainable Policy Commitment



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Sustainable Policy Commitment

Introduction

Columbus is a consultancy company with operations in Europe, Asia, North America and South America. This Commitment covers all legal entities in Columbus.

With this Policy Commitment, Columbus commits to respect human rights, and contribute to environmental and economic sustainability, by taking part in the global transition towards sustainable development. Our strategic objectives, determining the sustainability areas, to which we will contribute, have been developed from a solid basis of sustainability due diligence.

Our Commitment references the internationally agreed key areas of sustainable development: Human rights (including labor rights), environment (including climate), and economic sustainability (including anti-corruption, anti-trust, and tax).

We make the Commitment operational through the UN Guiding Principles on Business and Human Rights (UNGPs) covering social sustainability, and the OECD Guidelines for Multinational Enterprises (OECD), covering environmental and economic sustainability. We also support the ten principles of the UN Global Compact.

Due Diligence and Access to Remedy

We comply with regulations, wherever we operate. In addition, this policy describes our Commitment to Responsible Business Conduct in relation to sustainability.

In alignment with UNGPs/OECD We conduct regular operational-level impact assessments to identify and prevent or mitigate risks of impacts from our business practices on all key areas of sustainable development. We measure the effects of our actions and communicate our efforts to relevant stakeholders. Stakeholders that are interested in viewing our latest impact assessments may contact us through our tell-us mechanism.

If an actual impact occurs, we will seek to make the impact stop, prevent or mitigate reoccurrences, and provide access to remedy to those impacted, where we have caused or contributed to the impact.

Our Expectations to our Employees

We expect from our employees that they will assist us in demonstrating Responsible Business Conduct. We encourage our employees to inform us if they experience or identify adverse impacts on behalf of themselves or others on human rights, in

environmental or economic areas, which Columbus may be causing, contributing to, or linked to.

Our expectations to employees are further elaborated in the Columbus Code of Conduct for Employees.

Our Expectations of Business Relations

At Columbus we appreciate our strong network of business relationships (BRs). Our expectations of BRs are based on the same international minimum standard for Responsible Business Conduct to which we also hold ourselves accountable. We expect our BRs to implement the standard (UNGPs/OECD) as well. This includes asking the same from their BRs.

Any actual severe adverse impacts that our BRs cause, contribute to, or are linked to, shall be communicated publicly or to us promptly.

In addition, Columbus encourages our BRs to notify us, should BRs find, that Columbus's actions or omissions are at risk of causing or contributing to adverse impacts with BRs, or that BRs are at risk of contributing to adverse impacts with us.

Integration

This Policy Commitment is reflected in all other policies, procedures, and guidelines throughout our business. It is publicly available and is actively communicated to all relevant stakeholders. We will share this policy Commitment with our employees and BRs.

We encourage our employees and other stakeholders to inform us about challenges in relation to human rights, environmental, or economic impacts associated with us, our services, or our BRs, e.g., through our tell-us mechanism.

Review

This Policy Commitment has been reviewed and approved by the Board of Directors and the Executive Board in Columbus.

The Board of Directors will annually review and, if relevant, update this Policy.

Reviewed and approved by the Board of Directors on 10 December 2025.

Columbus®

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