



## **Environment, Social and Governance and Sustainability (ESGS) Policy**

### **1. ENVIRONMENT, SOCIAL AND GOVERNANCE AND SUSTAINABILITY STATEMENT**

Modulaire Group is committed to a responsible approach towards employees, customers, suppliers, communities, the environment, and society. We believe that responsible management and business success go hand in hand and we have embedded ESGS considerations across all activities. Our goal is to build a long-term sustainable business that delivers growth, employment, and economic benefit in an environmentally and socially responsible way.

We align our efforts with leading global frameworks, including:

- a) United Nations Sustainable Development Goals (UNSDG); United Nations Global Compact (UNGC); United Nations Guiding Principles on Business and Human Rights (UNGPs)
- b) Task Force on Climate-related Financial Disclosures (TFCD); Task Force on Nature-related Financial Disclosures (TNFD); (Corporate Sustainability Reporting Directive (CSRD); The Australian Sustainability Reporting Standards (ASRS); & European Sustainability Reporting Standards (ESRS) in each case as applicable.
- c) Science Based Targets initiative (SBTi)
- d) EcoVadis

### **2. ABOUT THIS POLICY**

This policy sets out our approach to ESGS and the promotion of responsible business. We commit to:

- a) Promote ESGS throughout all business activities and processes to reduce or mitigate environmental and social impacts and improve governance and sustainable practices.
- b) Environment
  - i. Provide customers with sustainable and circular solutions (*Loops Within Loops*);
  - ii. Improve the sustainability performance of our supply chain; and
  - iii. Design and deliver safe, energy-efficient and low carbon solutions to our customers using clean and innovative technology where possible;
  - iv. Reduce the environmental (energy, carbon, water and waste) and biodiversity impacts of our activities, including, on-site, off-site and other

services. This approach is guided by our internal policies, including the Policy on Electrification of Machinery, Forklifts and Vehicles, as well as the Waste and Water Policy and the Group's Biodiversity Policy, which collectively support our commitment to sustainable operations and environmental responsibility.

- v. Achieve greenhouse gas (GHG) emissions reductions aligned to SBTi targets; and
- vi. Collaborate with suppliers to provide GHG emissions data as per the Group's *Responsible Supplier Handbook and Responsible Supplier Policy*

c) Social

- i. Provide a safe, inclusive, diverse, motivating environment for employees, contractors and visitors;
- ii. Promote organisational and behaviour change to meet ESGS commitments;
- iii. Create opportunities to empower our employees to add value for our customers, suppliers and communities;
- iv. Support and encourage employees to participate in paid volunteer initiatives, fostering community engagement and social responsibility;
- v. Foster partnerships with educational organisations to raise sustainability awareness;
- vi. Undertake due diligence as per the Group's *Responsible Sourcing Policy* which includes identification of social issues (e.g. discrimination, harassment and violence, forced or child labour, modern slavery) and remediation and reporting of salient risks across the value chain; and
- vii. Achieve a workplace free from injuries by prioritising safety in every operation, promoting hazard awareness, and continuously improving safety practices

d) Governance

- i. Ensure strict compliance with any applicable legislation in relation to ESGS;
- ii. Require all Group functions and business units to contribute to and report on the ESGS group commitments and targets;
- iii. Achieve sustainable growth and performance through responsible corporate governance with an open dialogue with all stakeholders;
- iv. Conduct a comprehensive Double Materiality Assessment (DMA) and implement Impact, Risk, and Opportunity (IRO) for decision-making every 3 years; and
- v. Conduct all activities in line with the organisation's Cybersecurity Policy, associated procedures, and training requirements.

e) Sustainability

- i. Support commitments to various frameworks, including the UN Sustainable Development Goals (SDGs 4, 5, 9, 11, 12, 13.), UNGC (Human Rights, Labour, Environment and Anti-Corruption), the TCFD framework to establish NetZero climate action plan; and
- ii. Implement strategies for both the organisation and suppliers to promote *Loops within Loops* (circularity), including the reuse, repair, and recycling of products and materials to minimise waste

### **3. MANAGEMENT AND REVIEW OF ESGS**

- a) The Board of BCP V Modular Services Holdings Limited, including independent non-executive directors, has overall ESGS oversight (including climate change) and approves material initiatives, disclosures, and reports.
- b) The ESGS Committee supports the Board by shaping strategy and overseeing material risks and opportunities, disclosures, reporting, operations, and policies. Members include a Brookfield nominee, Group CEO, Group General Counsel, ESGS Director, and Group CHRO.
- c) The Audit and Risk Committee oversees compliance with the Corporate Sustainability Reporting Directive.
- d) The Executive Committee develops and implements ESGS plans across Strategic Business Units (SBUs), and monitors objectives, policies, and projects.
- e) The ESGS Team and Working Groups, made up of ESGS Managers and functional leads (Operations, HR, Finance, etc.), execute initiatives set by the ESGS Committee.
- f) The Group General Counsel and ESGS Director are responsible for this policy, its implementation, and resourcing.
- g) SBUs coordinate, deliver, and report ESGS actions locally, ensuring alignment with Group policy and accurate KPI reporting.
- h) ESGS policies and actions provide the foundational data that supports the organisation's ESGS metrics and key performance indicators (EMKPI) template. The ESGS policies and EMKPI template ensure that ESGS-related activities are systematically measured and monitored, maintaining alignment with the organisation's overarching environmental, social, and governance objectives and external standards and frameworks
- i) This policy applies globally; where local laws conflict, those laws take precedence.
- j) This policy will be reviewed annually, or earlier if circumstances change significantly, to ensure it remains current and effective.
- k) The Board and Executive Committee endorse and support this policy.

I) ESGS actions and activities will be coordinated and reviewed using the following hierarchy:

