

## Corporate and Social Responsibility (CSR) Policy

**Sphere Commodities Group Pte Ltd and its affiliated companies (“the Sphere Group”)** is committed to operating responsibly, ethically, and sustainably in Singapore, the Philippines, and Australia. As a company involved in recycling electronic waste (e-waste), we recognize our responsibility to minimize environmental impact, support the communities we serve, and uphold high standards of governance and accountability.

### 1. Purpose and Scope

This Corporate and Social Responsibility (CSR) Policy outlines our commitment to:

- Promoting sustainable environmental practices.
- Supporting the well-being of communities and employees.
- Ensuring compliance with local and international regulations.

### 2. Core Principles

#### Environmental Responsibility

- **Sustainable Practices:** We aim to reduce environmental harm by employing advanced recycling techniques to process e-waste efficiently and responsibly.
- **Data Security:** We ensure secure destruction of data-bearing devices to protect privacy while facilitating safe recycling.
- **Waste Reduction:** We promote the repair, reuse, and refurbishment of electronic devices whenever possible to extend their lifecycle.
- **Compliance:** We adhere to environmental laws and regulations in all operational jurisdictions, including Singapore’s Environmental Protection and Management Act, the Philippines’ Ecological Solid Waste Management Act (RA 9003), and Australia’s National Television and Computer Recycling Scheme (NTCRS).

#### Social Responsibility

- **Community Engagement:** We conduct awareness campaigns on proper e-waste disposal, the importance of recycling, and reducing electronic waste in the community.
- **Partnerships:** Collaborate with schools, non-profits, and local governments to improve e-waste recycling infrastructure and education.
- **Charitable Contributions:** Donate refurbished devices to underprivileged communities and schools, supporting digital inclusion and access to technology.
- **Employee Well-Being:** Foster a safe, inclusive, and supportive workplace, with regular training on health, safety, and sustainability practices.

#### Economic Responsibility

- **Fair Practices:** Engage in fair trade practices and maintain ethical sourcing of materials for any resale or refurbishment.
- **Local Economies:** Partner with local businesses and service providers to support economic development in the regions we operate.
- **Job Creation:** Contribute to job creation in recycling, logistics, and related industries, offering fair wages and growth opportunities.

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### 3. Goals and Objectives

- **Reduce E-Waste:** Divert a significant portion of electronic waste from landfills through recycling, reuse, and recovery initiatives.
- **Promote Awareness:** Increase public understanding of e-waste management through targeted education and outreach programs.
- **Zero Harm Commitment:** Aim for zero harm to the environment and communities by employing safe and eco-friendly recycling processes.
- **Carbon Reduction:** Reduce greenhouse gas emissions in our operations by optimizing logistics and using energy-efficient equipment.

### 4. Governance and Accountability

- **Leadership Commitment:** Our management team is committed to integrating CSR principles into all levels of decision-making.
- **Regular Audits:** Conduct regular internal and third-party audits to ensure compliance with environmental, social, and governance standards.
- **Reporting and Transparency:** Publish an annual CSR report detailing progress toward our environmental, social, and governance goals.

### 5. Stakeholder Engagement

We are dedicated to engaging with all stakeholders, including customers, employees, suppliers, local communities, and governments, to achieve shared sustainability objectives.

### 6. Employee Involvement

Employees are integral to achieving our CSR goals. We encourage active participation in CSR initiatives, including volunteering for community programs, contributing to process improvements, and sharing innovative ideas.

### 7. Compliance with Laws and Standards

We ensure strict adherence to local, national, and international regulations in the regions we operate:

- **Singapore:** Resource Sustainability Act (RSA)
- **Philippines:** Clean Air Act (RA 8749) and Toxic Substances and Hazardous and Nuclear Wastes Control Act (RA 6969)
- **Australia:** Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

### 8. Continuous Improvement

We are committed to continuously improving our CSR efforts by adopting emerging best practices, investing in new technologies, and seeking feedback from stakeholders.

### 9. Contact and Feedback

We value stakeholder input to refine our CSR initiatives. For questions, suggestions, or concerns, please contact:

## **Corporate and Social Responsibility (CSR) Policy**

For questions or further clarification about this policy, please contact:

- Australia: Douglas Hunt, [Douglas.Hunt@spheregroup.global](mailto:Douglas.Hunt@spheregroup.global) PH: +61 439 876 116
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By aligning our operations with this CSR Policy, we aim to drive positive environmental, social, and economic impact, creating a sustainable future for all.

**Approved by the Board**

**January 2026**