

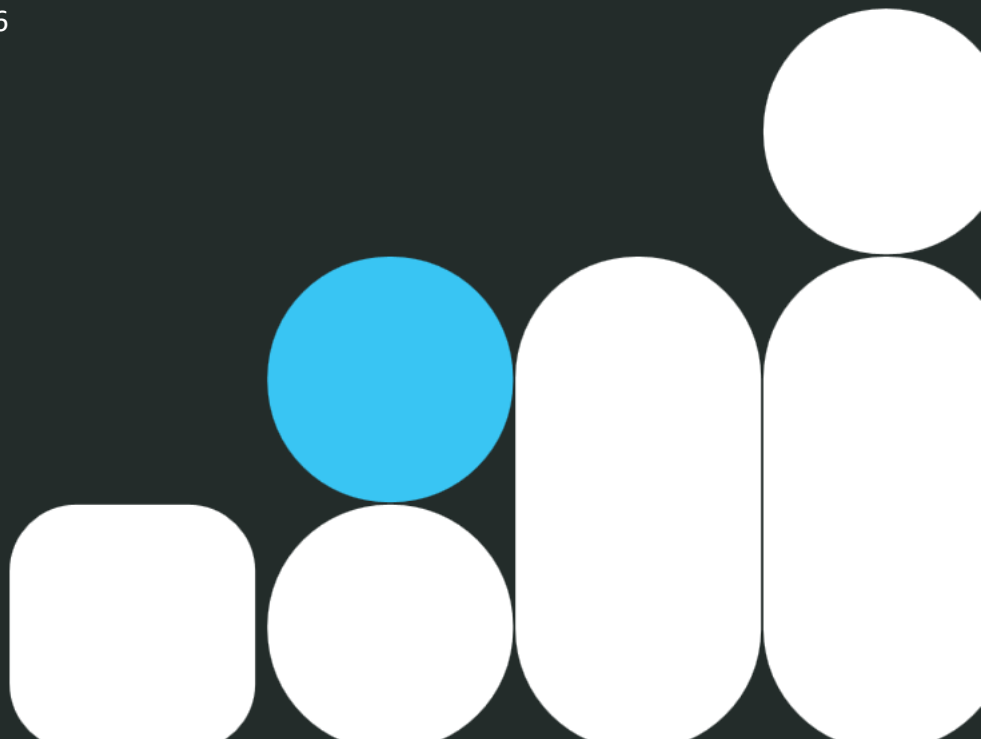


Puro.earth Policy

# Corporate Social and Environmental Policies

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# 1. Purpose

This document describes the corporate social and environmental policies for employees of Puro.earth. It is important that whilst delivering on our mission to enable society to reward negative emissions that this is carried out in an ethically, social, and environmentally just manner.

## 2. Ethical guidelines

Our ethical business practices are grounded in the following core principles:

- **Integrity:** We act with honesty and integrity in all our business dealings, ensuring transparency and fairness in our decisions and actions.
- **Respect:** We treat all individuals with respect, valuing diversity and fostering an inclusive environment where every voice is heard.
- **Accountability:** We take responsibility for our actions and their impact on our stakeholders and the environment, striving for excellence in all we do.
- **Sustainability:** We commit to sustainable business practices that contribute to the health and wellbeing of our planet, aligning our operations with our mission to remove carbon dioxide from the atmosphere.

We expect all Puro.earth employees to be familiar with and follow the procedures below.

### 2.1. Compliance with Laws and Regulations

- 2.1.1. Ensure compliance with all applicable laws, rules, and regulations in the jurisdictions where we operate.
- 2.1.2. Stay informed about relevant legal and regulatory requirements related to your role and responsibilities.
- 2.1.3. If any deviations are found, employees are encouraged to report them according to a separate [Whistleblower Policy](#).

### 2.2. Conflict of Interest

- 2.2.1. Avoid situations where personal interests could conflict, or appear to conflict, with the interests of Puro.earth or our stakeholders.
- 2.2.2. Disclose any potential conflicts of interest to your supervisor or the designated compliance officer according to the separate [Conflict of Interest Policy](#).

### 2.3. Confidentiality and Data Protection

- 2.3.1. Safeguard confidential and proprietary information, sharing it only with authorized individuals as required.
- 2.3.2. Respect the privacy rights of all individuals, ensuring the responsible use and protection of personal data as described in our [Privacy Notice](#).

## 2.4. Fair Dealing

- 2.4.1. Engage in fair and open competition, refraining from deceptive or unethical practices intended to gain an unfair advantage.
- 2.4.2. Treat partners, suppliers, competitors, and customers with fairness and honesty.

## 2.5. Respect in the Workplace

- 2.5.1. Foster a work environment free from harassment, discrimination, and bullying, where everyone is treated with respect and dignity.
- 2.5.2. Support diversity and inclusion, recognizing the value of diverse perspectives and experiences.

## 2.6. Reporting and Addressing Ethical Concerns

Puro.earth encourages an open and transparent culture where employees feel comfortable raising concerns about potential ethical issues without fear of retaliation. If employees encounter a situation that conflicts with our ethical standards, or if you have concerns about practices within the company, you are encouraged to:

- Speak directly to your supervisor or another member of management.
- Contact the Management Team.
- Utilize any Whistleblowing and reporting channels established by the company for this purpose.

We are committed to investigating all reported concerns promptly and thoroughly, taking appropriate action to address and rectify any unethical conduct.

# 3.Environmental Responsibility

This chapter outlines our approach to environmental responsibility, emphasizing the integral practices we employ to minimize our environmental footprint and contribute positively to deliver the net in net-zero emissions.

## 3.1. Conscious Travel and Digital Collaboration

We adopt a 'fly less, impact more' philosophy, prioritizing essential travel only and leveraging digital tools to bridge geographical gaps. Video conferencing, digital signatures, and other online collaboration tools are extensively utilized to reduce the need for physical travel, thereby significantly lowering our carbon footprint associated with business operations.

## 3.2. Remote Work and Flexible Policies

We allow employees to work remotely, so we reduce the emissions associated with commuting and lower the demand for office resources and support a work-life balance that respects our planet's boundaries. We offer flexible work contracts for employees who prefer not to adopt a full-time contract.

## 3.3. Sustainable Office Practices

We implement recycling programs tailored to the possibilities and limitations of the local area. We strive to minimize waste and encourage the use of reusable and sustainable materials.

### **3.4. Measuring, Reporting, and compensating our Carbon Footprint**

Understanding our impact is crucial to managing and mitigating it. We are committed to:

- Each year, we conduct a comprehensive assessment of our carbon footprint, measuring the emissions generated from our operations, including energy usage, business travel, and any other significant sources.
- We measure our annual carbon footprint and actively compensate for our annual carbon footprint by purchasing Carbon Removal Certificates (CORCs). This ensures that we not only neutralize our own impact but also contribute directly to the advancement of carbon removal technologies and projects.

## **4. Social Responsibility**

### **4.1. Embracing Diversity**

We recognize that a diverse workforce enriches our company with a wide range of perspectives, ideas, and approaches, which is crucial for driving innovation and achieving our mission. We are committed to promoting diversity among our employees and other stakeholders, ensuring an inclusive environment where everyone is respected, valued, and given equal opportunities to succeed.

### **4.2. Employee Development**

Puro.earth offers comprehensive training programs tailored to the needs and aspirations of our staff. These programs encompass a wide range of topics, from technical skills in carbon removal technologies to leadership and management.

### **4.3. Health and Well-being**

Puro.earth provides comprehensive health services to all staff, regardless of their location. Our health programs are designed to support the physical, mental, and emotional well-being of our team members, ensuring they have access to the necessary resources and support to thrive both in and out of the workplace.

### **4.4. Ethical Supply Chain Management**

We require all suppliers to abide by stringent social safeguards, enforcing human rights and ethical practices in their operations. We conduct due diligence to ensure that our partners share our values and commitment to social responsibility, fostering a supply chain that is not only efficient but also ethical and sustainable.

### **4.5. Zero Tolerance for Modern Slavery**

We are unequivocally opposed to all forms of forced labor, human trafficking, and any practices that exploit individuals. We aim to identify any instances of modern slavery, ensuring that our business activities uphold the highest standards of human dignity and rights.

## **5. Engagement with Rule Makers**

We engage in an open and transparent manner with all rule makers. Our responses to consultations are publicly available on Government websites and where we are active

we sign up registers to declare our activities (for example: [EU Transparency Register](#)). We track our membership in external associations to ensure they are aligned with our mission.

We advocate for the role of durable carbon removals on the pathway to net-zero emissions, and we support the introduction of policy measures to build demand for durable carbon removal credits in both voluntary and compliance markets, corporate disclosure, and product claims.

As a service provider of market infrastructure we collaborate with governments, think tanks, environmental non-governmental organisations, and academics to build support for solutions which deliver the net in net-zero emissions.

## 6.Version History

Version	Issue Date	Comment
V1.0	9 February 2025	Initial version published
V1.1	28 April 2026	Update of responsible party for policy management due to organisational change Addition of version history



# puro earth

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Puro.earth is the world's leading market infrastructure provider for engineered carbon dioxide removal (CDR). We provide the certification frameworks, scientific standards, and digital systems that allow engineered CDR to scale as an investment-grade market.

At the core of this infrastructure is the Puro Standard - the world's first dedicated standard built for the needs of an engineered CDR market. We certify suppliers under the Puro Standard that durably store carbon dioxide for at least 100 years, and in many cases over 1,000 years. To date, we have certified over 100 engineered CDR projects, resulting in the issuance of over 1.5 million CO<sub>2</sub> Removal Certificates (CORCs) in the Puro Registry as verified, traceable, investable assets. Our infrastructure is trusted by over 700 companies worldwide to procure carbon removals with confidence.

Nasdaq has owned a majority stake in Puro.earth since 2021. This brings 50+ years of expertise in building and operating the world's most trusted markets, strengthening Puro.earth's ability to deliver the transparency, rigor, and operational capacity needed to make CDR an institutional-grade asset class.

Puro.earth is an ICVCM Eligible Carbon Crediting Programme.