

SUSTAINABILITY POLICY

POLICY STATEMENT

It is the policy of Abraxys Ltd to practice a continuous improvement approach to understanding and taking appropriate responsibility for any adverse environmental, social, and economic impacts of its purchasing. In doing so, Abraxys shall consider impacts on a life-cycle basis and prioritise actions according to: alignment with the Abraxys values, magnitude of impact, and compliance with any applicable regulations.

PURPOSE

This Policy is adopted in order to align the Abraxys purchasing with its values and goals. In doing so, Abraxys seeks to harness the influence of its purchasing to support markets for, and increase accessibility to, more sustainable goods and services.

APPLICABILITY

This policy applies to all types of Abraxys funded procurements and to all Abraxys divisions and employees. Specific employee roles, responsibilities, and expectations are further described within this policy.

POLICY IMPLEMENTATION

In order to practice a continuous improvement approach to understanding and taking appropriate responsibility for reducing the adverse environmental, social, and economic impacts of its purchasing, this policy establishes the following implementation hierarchy:

1. **Core Strategies.** These establish overarching sustainable procurement strategies to implement over time. They provide value-aligned direction to take into account during project and program planning, and direction from which to build minimum requirements, best practices, and related implementation tools.
2. **Minimum Requirements.** These are the specific mandatory requirements for a particular good or service category. They are the actions that support sustainable procurement Core Strategies.
3. **Leadership Opportunities.** These are developed to identify (optional) opportunities for continuous improvement among stakeholders. They identify how to go beyond Minimum Requirements in a particular good or service category to further reduce adverse impacts.

CORE STRATEGIES

For any of the following Core Strategies, it is understood that they shall be undertaken in conjunction with traditional purchasing considerations, such as budget, product/service performance requirements, and availability. Core Strategies provide direction for decision making with mandated actions implemented through the Minimum Requirements, but also as needed in the absence of specific Minimum Requirements. Prior to making new purchases, employees are also expected to consider: the need for the purchase; opportunities to extend the life of the existing item or material; and meeting the operational need through a different means (e.g. renting vs. purchasing).

1. Utilise processes, technologies, products, or services that reduce consumption of natural resources or chemicals.
2. Employ processes, technologies, products, or services that reduce waste.
3. Invest in processes, technologies, products, or services that reduce the sourcing and use of Carbon-Based Fuels.
4. Seek out, specify, and purchase products with lower Embodied Carbon than the status quo.
5. Seek out, specify, and purchase products that minimize exposure of Substances of Very High Concern to people and the environment.
6. Consciously design procurement processes and related programming to support a diverse contractor base, including small, minority, and/or women-owned businesses.
7. Whenever possible, utilise Life Cycle Costing methods to determine the full cost of a product, service, or design.

MINIMUM REQUIREMENTS & LEADERSHIP OPPORTUNITIES

Leadership Opportunities shall be well-researched to show that it is reasonable that the proposed action(s) will reduce an adverse impact with relatively low-risk to Abraxys when well-implemented. It is understood that the action[s] is worth pursuing so long as it aligns with the Abraxys sustainability values, even if the proposed action hasn't been tried or replicated by another public agency at the time it is proposed.

ROLES AND RESPONSIBILITIES

Abraxys shall periodically bring together stakeholders to review and update this policy.

Abraxys is responsible for developing and maintaining up-to-date Minimum Requirements & Leadership Opportunities; including bringing together stakeholders to develop and/or implement the Minimum Requirements & Leadership Opportunities as applicable.

All employees are responsible for following the Core Strategies and Minimum Requirements when planning and designing projects, developing project and operations budgets, developing asset management plans, writing product and service specifications or standards, selecting materials, making purchasing or supplier decisions, and developing and managing Abraxys contracts and price agreements as applicable to their roles and responsibilities and/or to a specific project.

Abraxys is responsible for developing and providing sustainable procurement training to Abraxys employees and other applicable stakeholders. Abraxys is responsible for taking into account these policy requirements when developing departmental and project budgets in order to ensure resources (budget and staff) are available to carry out these policy requirements.

Person who is ultimately responsible for Sustainability of the company:

- Name: Kane Simpson
- Title: Managing Director
- Date: 9th April 2026

Signed:



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