

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY

Issued by	Corporate Communications and ESG Department
Target	All Yahsat Stakeholders
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# Contents

<b>INTRODUCTION .....</b>	<b>3</b>
<i>Overview.....</i>	<i>3</i>
<i>Purpose .....</i>	<i>3</i>
<i>Scope .....</i>	<i>3</i>
<b>ROLES &amp; RESPONSIBILITIES .....</b>	<b>3</b>
<i>Board of Directors &amp; Board Committees .....</i>	<i>3</i>
<i>Executive Management.....</i>	<i>4</i>
<b>APPROACH .....</b>	<b>4</b>
1. <i>Reliable Corporate Governance .....</i>	<i>4</i>
2. <i>Serving Customers and Communities .....</i>	<i>6</i>
3. <i>Investing in People .....</i>	<i>7</i>
4. <i>Promoting Environmental Protection .....</i>	<i>9</i>
5. <i>Developing the Right Business Partnerships .....</i>	<i>10</i>
<b>TRAINING .....</b>	<b>11</b>
<b>PUBLIC REPORTING .....</b>	<b>11</b>
<b>CHANGES TO THIS POLICY .....</b>	<b>11</b>



# INTRODUCTION

## Overview

Al Yah Satellite Communications PJSC (Yahsat) is a publicly listed company on Abu Dhabi's Securities Exchange (ADX) and a subsidiary of Mubadala Investment Company. As the leading satellite operator in the United Arab Emirates (UAE), offering satellite services that reach over 80 percent of the world's population, Yahsat aims to fulfil its vision of becoming the global partner of choice for reliable, innovative, and affordable satellite solutions. Guided by Yahsat's mission, values, and sustainability-related ambitions, its operational activities continue to deliver exceptional value to customers, shareholders, and partners, while fundamentally incorporating environmental, social and governance (ESG) considerations to position Yahsat as a leader in advancing sustainable development and creating value for our stakeholders.

## Purpose

Yahsat believes that Environmental, Social, and Governance (ESG) principles are central and indispensable to developing sustainable businesses and assets that deliver long-term shared value for stakeholders. We are committed towards integrating ESG into our business philosophy and practices to drive positive change. This ESG Policy provides guidance to our groupwide approach on integrating ESG in business operations. Yahsat's ESG Policy outlines our approach and commitments towards addressing material ESG factors to better assess risk and identify opportunities to generate positive impact for Yahsat and its stakeholders, as well as guides the company on how it intends to contribute towards local, national, and international sustainability goals. As Yahsat's ESG factors evolve over time and change in terms of priority, so too will its approach toward addressing them for benefitting business, people, and the environment. With Yahsat's headquarters located in Abu Dhabi, contributing towards the sustainability ambitions of Abu Dhabi and the UAE is a priority, including Abu Dhabi's Economic Vision 2030 and the UAE National Space Strategy 2030. As a global operator, Yahsat recognizes its ability to contribute towards the international sustainability agenda, including the United Nations (UN) Sustainable Development Goals (SDGs) and UN space law treaties and principles. This ESG Policy will help to support ESG integration into policies, procedures, and responsible practices aligned with international best practices, and regularly report to stakeholders as per local and global standards.

## Scope

Yahsat's ESG Policy is applicable to all Yahsat Board members, employees, shareholders, long-term suppliers, contractors, subsidiaries, partners, and other stakeholders acting in any capacity for or on behalf of Yahsat and are expected to be familiar with and adhere to Yahsat's ESG Policy. This ESG Policy shall be reviewed regularly to reflect newly identified risks and opportunities to Yahsat's business and to also monitor changes or updates to industry trends, policy, and regulations to keep pace with industry standards.

# ROLES & RESPONSIBILITIES

## Board of Directors & Board Committees

The Board of Directors is responsible for overseeing Yahsat's approach to ESG and sustainability. The Board shall approve Yahsat's Sustainability Framework and regularly review its progress, as well as approve all Yahsat ESG-related policies in line with Yahsat Delegation of Authority (DOA).



The Audit, Risk and Compliance Committee of the Board shall regularly review ESG risks and approve the associated mitigation measures.

## **Executive Management**

The Executive Management team shall ensure Yahsat's approved Sustainability Framework and policies are effectively implemented.

The Executive Management team shall provide periodic updates to the Board of Directors on the progress of Yahsat's approved Sustainability Framework and key ESG risks.

## **APPROACH**

Yahsat's Environmental, Social, and Governance (ESG) Policy contributes to integrating ESG considerations throughout our business operations, driven by our innovative and unwavering commitment to a sustainable and digitally inclusive world, through affordable, reliable, and resilient technologically advanced solutions. This ESG Policy, will serve to publicly reinforce our commitment towards responsible business practices across our operations and ensure alignment of our actions towards positively impacting people and planet.

Yahsat's ESG Policy is derived from its Sustainability Framework, which comprises of five strategic and thematic areas ('pillars') of focus (as given below) necessary for Yahsat to promote its sustainability agenda.

### **1. Reliable Corporate Governance**

Yahsat is committed to operating with integrity and maintaining the highest professional and ethical standards in every aspect of its business. Through Yahsat's established and evolving governance structures, it aims to ensure all operational activities are performing as intended, in compliance with all applicable local and international laws and regulations, improving business performance, and ensuring stakeholders' interests continue to be met. Through this pillar, Yahsat aims to establish a foundation for sustainability leadership, advance its governance practices to the highest standards, and incentivize sustainability into corporate and subsidiary business practices.

#### **Business Ethics**

Yahsat's Code of Ethics and independent Ethics and Compliance function ensures key stakeholders including employees, suppliers, contractors, and subsidiaries are held accountable to the highest levels of professional and ethical standards. Annual ethics and compliance training reinforces Yahsat's commitment towards maintaining strong ethical business practices, and employees and other stakeholders can report any ethical violations through several channels – most of which are continuously strengthened, including whistleblowing mechanisms. To enhance transparency, Yahsat strives to disclose more information on its business ethics-related activities, including reporting on any breaches, as well as any occurrence of corruption and bribery cases and anti-competitive practices.

#### **Business Continuity & Risk Management**

The main objective for establishing effective business continuity practices is to ensure all satellite services provided to customers continue to be uninterrupted and maintain consistent levels of quality. To achieve this objective, Yahsat maintains Business Continuity Management plans that are periodically tested, audited by relevant independent entities, and undergo assurance activities.



Regular and comprehensive risk assessments are conducted to enable Yahsat to identify key ESG risks, as well as to establish and periodically monitor the controls designed to mitigate these risks. Necessary, additional reviews and investigations are conducted if any risk events materialize. Moreover, Yahsat is committed to exploring how to better integrate ESG risks into its risk assessment processes.

### **Competitive Behavior**

Yahsat prohibits anti-competitive behavior and provides guidance to employees on how to effectively manage anti-competitive situations, should they arise. Through annual ethics and compliance training, employees are trained and made aware of anti-competitive practices. All Yahsat suppliers are required to comply with Yahsat's Business Partner Code of Conduct, which addresses anti-competitive practices. To further mitigate competitive behavior risks, Yahsat's risk assessment processes review areas of its business with anti-competitive risks, as well as regularly audit the controls in these areas to ensure they are sufficient.

### **Corporate Governance**

The Board of Directors ('Board') is collectively responsible for the oversight and success of Yahsat's business. The Board is committed to standards of corporate governance that are aligned to both local capital markets regulations and international best practices, which is reflected in Yahsat's corporate governance framework, and the Charters established for Yahsat's Board and Board Committees, respectively. To assist the Board in discharging its responsibilities, Board Committees are established to oversee key responsibilities. The Board and its committees are also periodically assessed through internal (annual) and external (once every three years) performance assessment mechanisms, and all Board members receive annual training on multiple areas of importance to Yahsat's business.

To ensure alignment between the Board and management teams at Yahsat, a compensation-linked corporate scorecard has been developed that incorporates success metrics and targets, which include ESG KPIs.

To enhance Yahsat's corporate governance practices, the Board will aim to balance its composition by focusing on its diversity, fulfilling specific ESG responsibilities at both the Board and management levels, undergoing regular ESG induction training, incentivizing ESG performance throughout Yahsat, and incorporating ESG criteria into Board assessment mechanisms. During the Board nomination process, diversity factors are taken into consideration, such as gender, age, and nationality.

### **Data Privacy & Security**

Yahsat explicitly understands the need for data privacy and security for its customers and wider stakeholders, especially in the context of providing secured and critical satellite communications for national security purposes. To sufficiently meet these needs, Yahsat maintains strict information security practices through its robust governance mechanisms, which include an Information Security Charter, an Information Security Committee (includes C-Suite members), periodic information security reporting to Yahsat's Board of Directors, multiple relevant policies (including a standalone Data Privacy Policy), an Enterprise Security and Safety Department, regular awareness trainings and periodic audits to ensure all information security controls and processes are operating as intended. Moreover, a key aim of Yahsat's information security-related policies is to ensure the confidentiality, integrity, and security of all information.

Due to the rapid change in the information security industry, both from a technology perspective and in response to adversarial actions, Yahsat plans to continually enhance its information security capabilities and practices accordingly. Yahsat shall expand the scope of its information security-related policies to all Yahsat entities, outline information security expectations for all products and services, and align its processes to internationally recognized best practices to support Yahsat achieving third-party certifications. Regular and enhanced cyber-security penetration testing, security audits or



vulnerability assessments (both internal and external as applicable) shall be conducted on Yahsat's information technology infrastructure and practices affecting user data, and Yahsat will strive to align with organisations that share best practices associated with data privacy, security, and risk management.

## 2. Serving Customers and Communities

Through Yahsat's technological excellence and customer-centric approach, it strives to provide innovative, reliable, and affordable technologically advanced satellite solutions to customers and communities throughout the world. Ensuring customers are highly satisfied with Yahsat products and services continues to be a priority, and Yahsat aims to become a leader in providing reliable and responsive disaster support services, as well as helping to expand connectivity and addressing the limiting factors which have created the digital divide.

### Access to Communications & Connecting Communities

Through several global partnerships, Yahsat promotes and supports the expansion of internet connectivity and access to information for disadvantaged or vulnerable communities.

Examples of these partnerships have included:

- Providing reliable internet access and facilitating access to e-learning platforms.
- Training on information and communication technology (ICT).
- Telemedicine.
- Healthcare solutions.
- Communications solutions for communities involved in a humanitarian crisis stemming from man-made or natural disasters.

To continue promoting access to communications and connecting communities, Yahsat shall seek to understand and address the limiting factors contributing towards the digital divide, promote satellite phones and internet access to unserved and underserved communities, conduct digital-inclusion related training to multiple stakeholders, support the UN Secretary-General's Roadmap for Digital Cooperation, and enhance existing service offerings related to customer needs, disaster warning communications, and business continuity planning.

### Community Investment

A large part of promoting access to communications and connecting communities involves community investment. For the communities around the world which avail Yahsat's products and services, including those in the UAE, the relevant satellite infrastructure necessary to use these services is provided through intermediaries (partners) or directly by Yahsat.

To better understand the extent of its community impact, Yahsat shall seek ways to consistently measure its community investment results through a range of metrics, which could include the availability of low-cost services, number of internet connections provided to bridge the digital divide and create inclusion, indirect economic impacts, and/or social return on investment. Consistently monitoring these impacts will help to improve the development of Yahsat's community investment strategies, and in overcoming the digital divide.

### Customer Relationship Management

Through its centralized Customer Care Unit, Yahsat strives to provide customers with excellent standards of customer service. Several programs have been implemented throughout Yahsat to continuously monitor and guide the delivery of Yahsat's services, including service quality assurance programs (e.g.: establishment of Service Level Agreements to resolve



specific types of problems), customer experience recording programs (e.g.: customer satisfaction surveys), and quality assessment programs to assess customer interactions and support services. Additional ways Yahsat strives to improve customer experiences is through the provision of customer relationship management training, maintaining escalation protocols for unresolved customer problems, and using insightful customer relationship management systems.

To ensure Yahsat continues to effectively meet the needs of its customers and appropriately manage these relationships, customer service excellence is an integral part of the planning, resourcing, and delivery of all services to progress the implementation of its customer-centric programs. Yahsat shall seek to establish formal customer relationship management commitments, targets, and Key Performance Indicators (KPIs) for all types of customers. Yahsat shall explore how it can better serve the needs of its customers through product and service development and align its customer relationship management processes to internationally recognized best practices to consistently deliver excellent customer service.

## **Disaster Response**

Yahsat is proud to support the organizations striving to resolve and abate humanitarian crises resulting from man-made or natural disasters. By providing several governments and non-governmental organizations with technologically advanced satellite communication solutions, Yahsat continues to help these organizations to coordinate and address a range of humanitarian issues. Yahsat is also a signatory of the UN Crisis Connectivity Charter.

To become a recognized leader in providing innovative, affordable, resilient, and reliable disaster response solutions, Yahsat is committed to expanding its disaster response service offerings in multiple ways. Yahsat shall seek to establish formal disaster response commitments, targets, and KPIs, as well as explore the development of new disaster response service offerings associated with disaster warnings, business continuity planning, rapid deployment services, and programs to help community facing hardships.

## **3. Investing in People**

Yahsat is committed to empowering its people by providing each employee with the necessary resources to be successful. By committing to the development of a work environment that is safe, egalitarian, and rewarding, while maintaining appropriate levels of diversity and simultaneously promoting Emiratisation, Yahsat strives to attract and retain highly talented employees.

### **Employee Engagement, Diversity & Inclusion**

Yahsat is committed to maintaining an egalitarian work environment, where all employees are treated equally, and all forms of discriminatory acts associated with race, religion, gender, age, physical abilities, and ethnicity are strictly prohibited. Yahsat does not tolerate any form of discrimination, harassment or abusive behavior and all employees are encouraged to report any concerns without fear of retaliation. Yahsat promotes inclusion of women across management levels and different functions and strives to support the UAE's nationalization aims by supporting Emirati employees. To increase employee satisfaction, Yahsat is committed to regularly engage with its employees to ensure employee needs are appropriately assessed, reviewed, and addressed. In striving to achieve the highest levels of employee satisfaction and engagement, Yahsat is committed to implementing various initiatives like developing actions plans to increase employee engagement, establishing employee satisfaction targets, improvement of internal communication channels, awareness training on diversity, discrimination and/or harassment issues, offering flexible working hours, supporting remote working, and digitizing processes to improve efficiencies.



## Health & Safety

Yahsat is committed to maintaining the highest standards of health, safety, and wellbeing, to ensure the likelihood of work-related injuries and instances of ill-health remain low, as well as ensuring all Yahsat employees and contractors feel safe and secure regarding their physical and mental wellbeing, respectively. To effectively fulfill this commitment, Yahsat maintains a Health, Safety, and Environment (HSE) Committee, HSE Policy, associated manuals, and supporting standard operating procedures.

To enhance its overall health and safety practices, Yahsat shall undertake initiatives to promote employee and contractor health, safety, and wellbeing, including conducting HSE awareness raising activities, providing regular HSE training, offering stress management programs, developing workplace ergonomic policies, and monitoring and disclosing additional HSE performance indicators. All these initiatives will subsequently support Yahsat in aligning its HSE processes to internationally recognized best practices, which will position Yahsat to achieve high standards of health and safety in the future.

## Human Rights

In accordance with Yahsat's Code of Ethics, Yahsat abides by all international and national human rights declarations and principles related to employment practices, fair treatment, child labor, forced labor, and health and safety in the workplace. This includes protecting, respecting, and enhancing the labour rights and freedom of all workers. All Yahsat business partners, including suppliers, are required to abide by the same human rights declarations and principles, as stated in Yahsat's Business Partner Code of Conduct. Yahsat strongly encourages anyone to report violations of these principles using Yahsat's Ethics and Compliance helplines and email addresses.

Through regular engagement, Yahsat shall strongly encourage suppliers to monitor, address, and disclose their performance regarding human rights-related issues, as well as learn and share best practices to appropriately manage these issues. Yahsat shall periodically assess and monitor the social performance of its business partners with regards to respecting human rights, maintaining appropriate labor conditions, prohibiting child labor, ending forced labor, encouraging ethical behavior, and adhering to Yahsat's Business Partner Code of Conduct.

## Talent Attraction, Retention & Development

Yahsat is committed to promoting a culture of continuous employee development. All employees undergo annual performance appraisals and learning needs analysis, which support the development of each employee's training calendar. Individual performance improvement plans, respectively, are available to help employees meet the current and future needs of their roles. Talent management and Emiratisation programs are implemented to prepare employees to occupy higher positions. All development plans and programs are implemented through a range of internal and external training modes, each of which are assessed for their effectiveness. Yahsat supports and continuously monitor the succession planning for its critical resources.

Yahsat is committed to identifying, assessing, and acting on any key inhibiting factors which negatively impact its ability to attract, retain, and develop its highly talented workforce. Keyways Yahsat shall be striving to support its workforce include enhancing the career and leadership development support offered equally to everyone including women and people of determination, providing ESG training to ensure Yahsat is well positioned to achieve its sustainability-related ambitions, incorporating employee mentorship programs, and prioritizing the promotion of existing employees to fill vacant roles.



## 4. Promoting Environmental Protection

Yahsat is committed to establishing itself as a leader in promoting the sustainable use of space and protecting the environment. For its customers, Yahsat strives to enable them to effectively manage their environmental impacts through its technologically advanced satellite solutions.

### Carbon Emissions & Climate Strategy

Yahsat is committed to supporting the UAE's national climate change ambitions, including the UAE Net Zero 2050 strategic initiative and national climate change plans. For Yahsat's own greenhouse gas (GHG) emissions, Yahsat is committed to seeking out ways to significantly reduce these emissions. Yahsat is committed to identifying risks associated with climate change and to effectively managing its negative impacts on operations. Yahsat further aims to actively identify and seek opportunities linked to climate change and to offer innovative services through its technologically advanced satellite solutions. In this context, Yahsat is focused on exploring partnerships with the government, enterprises, and non-profit organizations and showcasing how its products and services can enable organizations to reduce their GHG emissions.

Yahsat is also committed to strengthening its processes to manage climate-related risks and opportunities, by integrating each within its enterprise-wide risk management system and aligning with international frameworks.

### Energy Management

Yahsat is committed to appropriately monitor and manage its energy consumption across its operations. Building management systems (BMS) have been introduced to monitor and adapt to seasonal energy usage, to reduce energy consumption based on hours of operation, and to use occupancy sensors to optimize building and equipment lighting, heating, ventilation, and air conditioning needs.

To enhance its energy management practices, Yahsat shall undertake various energy efficiency initiatives, including the refurbishment of energy intensive equipment, installing smart electricity meters, and conducting awareness raising activities on appropriate energy management practices.

### Environmental Management

Yahsat is committed to preserving the environment and reducing its own negative environmental impacts, especially by reducing its consumption of natural resources, promoting the reuse of materials, increasing recycling rates, and reducing both waste and wastewater generation. Various recycling programs are implemented at Yahsat which focus on recycling e-waste, wastepaper, cardboard, biodegradable waste, and other items. Besides this, as the importance of biodiversity increases around the world, Yahsat is committed to improving its environmental management practices by assessing and addressing the biodiversity impacts stemming from its operational activities, especially those activities occurring adjacent to or close to key biodiversity areas.

Yahsat will also focus on improving environmental performance across its supply chain by actively collaborating with its suppliers to incorporate environmental standards and indicators in their operations, periodically monitoring and assessing suppliers' performance and integrating ESG factors into supplier selection and retention criteria.

### Product, Innovation & Lifecycle Management

Yahsat is committed to developing technologically advanced innovative, affordable, reliable, and resilient products and services that enable customers to meet their needs, while simultaneously creating a positive social and environmental impact. For example, earth observation and geolocation are recognized by the UN in supporting the achievement of the UN



Sustainable Development Goals (SDGs), and the UN Office for Outer Space Affairs (UNOOSA) has outlined how the potential use of space-based services and technologies are widely supporting the achievement of the SDGs.

Yahsat is committed to promoting positive environmental impacts through its product packaging and waste management. For example, the product packaging, in which customers receive Yahsat products, indicates how to dispose or recycle such products when they reach the end of their life. To reduce waste generation, Yahsat is committed to developing circular economy programs to facilitate the reduction of waste generation, divert waste away from landfills, and keep materials (including precious materials) in circulation longer or indefinitely.

### **Sustainable Use of Space**

Yahsat is committed to establishing itself as a leader in promoting the sustainable use of space, both regionally and internationally. By complying with the UAE's Space Laws and the regulatory requirements of the UAE Space Agency, Yahsat promotes the sustainable use of space by registering its satellites with the UN Office of Outer Space Affairs, procuring satellites designed to mitigate the risks from space debris, continuously monitoring its satellites to prevent potential collisions with space objects, and deorbits its satellites towards the 'graveyard orbit' once a satellite reaches the end of its lifecycle. Moreover, Yahsat continues to promote the sustainable use of space by committing itself to the Inter-Agency Space Debris Coordination Committee's space debris guidelines, participating in associated domestic and international forums, and involving in consultations related to the development of the UAE's National Space Strategy 2030, which considers how to use space in a sustainable manner.

To further promote the sustainable use of space, Yahsat shall undertake a range of initiatives. Yahsat shall continue supporting the UAE's ambitions regarding the sustainable use of space, enhance its space debris mitigation plans to be aligned with international best practices and conduct employee training related to the sustainable use of space.

## **5. Developing the Right Business Partnerships**

Yahsat recognizes that its business partnerships are key assets to the business that can drive sustainability across the value chain and support mitigating operational risks. Yahsat is thus committed to developing the right business partnerships which can promote sustainable procurement goals and practices as part of its Sustainability Framework.

### **Controversial Sourcing & Partnerships**

Yahsat conducts comprehensive due diligence of all suppliers and business partners, taking into consideration the location of their operations, presence on sanctions lists, the types of products and/or services offered, and other relevant factors to gain transparency. If necessary, a whistle blowing mechanism is available for anyone to report supplier or business partner actions that violate Yahsat's Business Partner Code of Ethics.

Through periodic engagement, Yahsat will encourage its suppliers to incorporate ethical and sustainable sourcing considerations, as well as identify ways to address sustainable supply chain issues. Yahsat shall also regularly assess and monitor the environmental and social performance of its suppliers and business partners, using a minimum set of sustainability-related considerations.

### **Supply Chain Management**

Yahsat is committed to selecting its suppliers in a fair and transparent manner and adheres to the principles and practices for sustainable operations and procurement decisions to achieve positive environmental, social and governance impact. All supplier proposals are managed based on clear and transparent criteria through Yahsat's supplier portal and are evaluated through defined business rules and approval authorities. All supplier information is treated confidentially and is appropriately



stored and periodically updated. Any suspicious supplier-related activity is strongly encouraged to be reported to Yahsat’s Ethics and Compliance function. Specific KPIs are used to regularly monitor and track supplier performance, and regular procurement-related training is provided to the relevant Yahsat employees.

To enhance Yahsat’s sustainable supply chain management practices, Yahsat shall undertake a range of initiatives. Yahsat shall incorporate additional social and environmental considerations into its procurement evaluations, as well as encourage its suppliers to consider similar criteria into their procurement processes. Yahsat shall disclose more sustainable procurement related KPIs in its annual sustainability report and ensure its procurement activities support the UAE’s National Space Strategy 2030.

## TRAINING

To ensure Yahsat’s employees and subsidiaries comply with this ESG Policy, regular awareness and training on this Policy shall be conducted, including how to inform and update Yahsat’s contractors, consultants, business partners, and suppliers about the existence and expectations of this Policy. Regularly conducting awareness, training, and workshops on ESG Policy will enable Yahsat to create a common, comprehensive understanding of ESG goals across its business operations, and will help to develop the necessary expertise to fundamentally incorporate ESG factors into Yahsat’s business strategy and financial considerations.

## PUBLIC REPORTING

Yahsat understands the importance and value of being transparent with its stakeholders on its ESG metrics, plans, targets, implementation process, and achievements to continuously measure, monitor and manage results. Through its annual ESG report as per local and global reporting standards, Yahsat is committed to publicly disclose its ESG performance and impact. To further improve transparency, build stakeholders’ confidence, and ensure the robustness of its ESG data reported, Yahsat is committed to periodically undertake independent assurance on its ESG performance.

## CHANGES TO THIS POLICY

This ESG Policy may be modified from time to time to comply with our Sustainability Framework. Yahsat will ensure that material changes to the Policy are notified promptly, through an “update” on yahsat.com, or other appropriate method of communication to interested parties. Should you require a status update, you may raise a request by sending an email to [sustainability@yahsat.ae](mailto:sustainability@yahsat.ae)

**Table 1 Sign-off and ownership details**

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**Table 2 Document History**

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1	New Policy	All	New Policy	November 2022	Quintin De Villiers, Khurram Zafar
2	New Policy	All	Review & update	December 2022	Yugesh Suneja
3	New Policy	All	Review & update	January 2023	Ali Al Fahim
4	New Policy	All	Review & update	December 2022	Shirose Osman
5	New Policy	All	Review & update	April 2023	Khurram Zafar
6	New Policy	All	Review & update	July 2023	Shirose Osman
7	New Policy	All	Review & update	July 2023	Sangeeta Sharma
8	New Policy	All	Review & update	July 2023	Danielle Noble

**Table 3 Revisions**

Revisions in ESG Policy	
Revision Frequency:	On next change
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