

ENVIRONMENTAL POLICY

Introduction

ITC Group is a language services provider. We have more than 60 employees spread over three offices in France, the United States and Canada, and our employees can reside anywhere in the world. We recognize that our business has an impact on the environment, mainly due to the digital tools we use to produce our services and to communicate.

ITC Group is committed to developing an effective framework and converting it into actions that protect and, if possible, improve the environment by reducing the environmental impacts of our company and our employees, by preventing pollution and by adapting to support a low-carbon future.

Responsibility

All employees and management team members will work to advance ITC Group's environmental initiatives.

Communication

An Environmental Policy committee will be appointed in the fourth quarter of 2022. This team will regularly communicate with employees to raise awareness, lead activities, motivate participation and guide staff to foster a shared commitment to protecting the environment.

Our Principles

To reach our environmental goals, ITC recognizes that we need to communicate effectively with our employees to encourage them to take action on professional and personal levels, in collective and individual ways.

ITC Group works with the EcoVadis rating agency to evaluate our Corporate social Responsibility (CSR) performance. We obtained a Bronze medal after our first audit in 2021.

Since almost all staff work remotely, our initiatives will be focused on:

- Raising employee awareness about their role in protecting the environment as consumers
- Reducing data storage and energy consumption
- Recycling our electronic waste
- Choosing suppliers that practice CSR
- Making purchases responsibly
- Reducing our carbon footprint

1. Reducing Environmental Impact through Remote Work

- Reduces the ecological footprint of our real estate

In France, Canada and the United States, 99% of work is completed remotely. A coworking space is provided for employees who wish to use it. This flex office solution gives us space to meet for team meetings and spend informal time with colleagues. Since there are no dedicated workspaces, ITC has considerably reduced our ecological footprint by selling our office building.

- Reduces energy consumption

Since employees work remotely, they no longer travel to and from work, which reduces their carbon emissions.

Teleworking also significantly reduces printing since all work is done on screens. All of the projects we work on are archived in electronic format only. We also send and receive invoices electronically whenever possible. These actions have considerably reduced our daily paper consumption.

The implementation of remote work also means employees are responsible for their water and electricity consumption.

2. Reducing Data Storage through Management

Given that most of ITC's environmental repercussions are related to digital technology, we do everything we can to reduce them by simplifying our data management practices.

To this end, ITC is currently creating a data management and retention policy that includes a schedule for deleting or archiving unused files as well as best practices for sharing files and information and information about the environmental impact of our data management practices. One of this policy's goals is to reduce the amount of data we store and streamline operations.

3. Raising Employee Awareness

ITC Group communicates with employees once a month through the Environmental Policy Committee to encourage them to reduce their environmental impact through everyday choices.

Various topics are discussed and guides on environmental best practices are shared in a dedicated Teams channel.

For example:

- Use fewer disposable take-out containers, water bottles and beverage cans
- Reduce food waste
- Eat fruits and vegetables that are in season
- Buy local

- Share, give away, sell what you don't need or want
- Try these alternatives to single-use products
- Weigh the environmental impacts of buying online
- Manage your garbage/rubbish better
- Follow these tips to reduce your energy use
- Share your experiences and ideas (volunteering at nature organizations, useful addresses, media articles, etc.)

Actions that will be implemented by the Environmental Policy Committee:

- Provide information so employees are informed about their roles and responsibilities
- Conduct a survey on current individual best practices/information about reducing your impact on the environment and repeat the same survey in six months
- Set up a group cleaning schedule for the server with a Save the Date notice on Teams
- Create an environmental tip-of-the-month sheet
- Share information about national and international events such as European Week for Waste Reduction, Mobility Week and World Environment Day
- Highlight initiatives
- Create a suggestion box on Teams
- Keep up the momentum

4. Handling Electronic Waste

ITC Group has set up a virtuous cycle for managing electronic equipment. After the equipment is wiped to delete all existing data, computers are recycled by donating them to non-profit organizations or schools.

Obsolete laptops and desktops, as well as unused cables, keyboards, mice and screens are taken to waste disposal centers for recycling.

5. Making Responsible Purchasing Decisions

ITC Group purchases recycled paper and local office supply products.

6. Supporting Biodiversity

ITC reduced our carbon footprint in 2021 by purchasing trees in the name of our customers. Through our partnership with Reforest'Action, we have already planted 49 trees, which corresponds to seven tons of CO₂ stored, 147 shelters created for animals and 196 months of oxygen generated. This initiative continues in 2022.

7. Managing Business Trips

ITC uses a wide range of communication methods: phone, email, instant message, audio and video conferences, etc. All these tools enable us to reduce unnecessary travel and save time.

ITC Group's quarterly meetings attended by all employees are held via Zoom.

We encourage our sales team to limit their visits to our main customers to two per year and to use video conferencing via Teams for communication.

When ITC France employees travel to the coworking space, they are encouraged to use public transportation. For longer trips, using the train instead of a car is preferred.

Company cars provided to some employees meet eco-driving standards.

If you have any suggestions or concerns about environmental practices, please email them to compliance@itcglobaltranslations.com. They will be kept strictly confidential.

REVISIONS AND VALIDATION

Document revisions

No.	Document version	Revision description	Revision date	Revised by
1	V1	Environmental policy created	10/12/2022	M. Lavarenne
2				
3				
4				
5				

Document Validation

This document and its version number have been logged in the ITC Document Tracking file. It has been signed off and validated by the ITC HR Manager.

Date: October 12, 2022

Name: M. Lavarenne

Signature: 