ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) POLICY

Version 1.1

CARBONIA INDUSTRIES SAC

Lima, Peru

1. INTRODUCTION

Environmental, social and governance issues do not exist in a silo. ESG is about bringingthem together under one banner to demonstrate the positive impact our business is havingon the world. ESG is much like corporate social responsibility but on a vastly larger and more measurable scale. Companies who are at the forefront of talking about their ESG scores are generating more attention from across the business spectrum, and investors are actively looking for high ESG scoring companies.

This policy will inform our ESG efforts moving forward. This includes, but is not limited to reporting, disclosures (both material and non-material), business practices, policies, procedures, investments, board activities, stakeholder engagement, and investor relations.

Nothing in this policy shall be taken or understood to limit or reduce our current committees, both legally and ethically.

2. PURPOSE OF THIS POLICY

The purpose of this policy is to provide information about ESG (Environmental, Social and Governance factors) and to encourage the business to understand ESG better.

This policy has been agreed upon by the company directors.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

3. RESPONSIBLE FOR THIS POLICY

The company directors have overall responsibility for the effective operation of this policy.They have delegated responsibility for overseeing its implementation. Suggestions for change should be reported to Management Board of the Company..

Line managers have day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.

This policy is reviewed annually by the company directors. Changes may be made at anytime as government guidance develops.

4. COMPANY ESG COMMITMENT

The Company strive to build sustainable, equitable, healthy, and diverse communities through a combination of innovative business practices and exemplary environmental, social and governance (ESG) performance. This commitment informs every aspect of our business, including how we design and build new projects, operate our company, collaborate with stakeholders and report progress.

This ESG Policy sets out our approach to sustainability matters. At the heart of the Policyis a corporate culture that has sustainability at the core of all our business operations andvalues.

5. COMPANY STATEMENT ON CLIMATE CHANGE AND THE ENVIRONMENT

The Company are committed to driving down our energy and carbon impacts, as we believe that climate change is one of the greatest risks to our world. Our sustainability program is committed to environmentally sustainable initiatives that deliver near-term efficiency, value, and health for our business, our people, and the wider community.

The Company encourage our customers to reduce their impact on the environment by recommending the use of more sustainable materials. We actively promote a paper-freeoffice. We regularly support our clients to avoid printing and we will make all endeavoursto be a digital-first business.

The Company seek to comply with current environmental legislation and work to minimize the impactof our activities on the environment.

The Company support the recommendations of the Taskforce on Climate-related Disclosure (TCFD)and engage with our stakeholders and encourage enhanced disclosure on climate change, biodiversity, and the SDGs, including efforts to advance the underlying goals, such as thoseof the Paris Agreement.

6. COMPANY STATEMENT ON SOCIAL RESPONSIBILITY

The Company focus is to deepen relationships with our key stakeholders by investing in our employees and partnering with our customers, communities, investors and suppliers.

The Company is committed to engage with our employees to provide a challenging, dynamic, inclusive and diverse work environment that supports their professional development, aswell as promoting a good work-life balance that prioritizes their overall health and wellness.

The Company will support initiatives that benefit the environment, human welfare and education. Thisincludes skills training that advance workforce talent pipelines for our customers and economic development in the communities in which we operate.

The Company will engage suppliers, customers and employees around safety, health, and wellness.

The Company will preserve and promote the protection of human rights and welfare within our ownbusiness activities, as well as those of our supply chain, in accordance with our Modern Slavery Statement, Health and Safety Policy, Mental Health and Wellbeing Policy, Equalityand Diversity Policy and being a Living Wage Accredited employer.

7. COMPANY STATEMENT ON ETHICAL GOVERNANCE

The Company focus is to promote strong oversight, transparency and risk management at all levelsof our organization, ensuring the resilience and long-term preservation of value for our business.

The Company will maintain strong corporate governance practices through exemplary board stewardship, management accountability, and proactive risk management.

The Company will mitigate risk exposure and build the resilience of our business to climate change,earthquakes and other catastrophic events through smart design and sighting.

The Company is committed to high ethical standards through executive leadership that promotesa culture of integrity.

The Company cultivate strong stakeholder relationships through transparency, open communications, and responding to stakeholder input.

The Company establish clear and effective governance for ESG, set goals and establish accountability through our board of directors.

8. COMPANY BUSINESS AND ESG

ESG is about assessing that net positive impact in the world, and taking concerted, defined and measurable action to improve it. Our value rests in our employees, our communities,and the wider world. Therefore, ESG forms a fundamental part of how our business livesour values in the real world.

The ethical and practical values that make up the different parts of ESG have always beenat the heart of what we as a company stand for. With the growth of ESG and the increasedawareness of these factors among our key stakeholders, we have a better opportunity totell the story of how our business makes a positive impact in the world.

The drive to assess a broader range of factors in a holistic manner, from environmental and climate change considerations to the social issues and how we invest in our people,to the structure of our business and always reaching for better governance, means we can tell our story better. We welcome opportunities to highlight the positive impact we have on the world.

9. COMPANY DUTY TO THE WIDER WORLD

As a business, we also have a duty to our people, our customers, and the wider world. ESGgives us an opportunity to bring those impacts together. We value investing in our peopleas we value protecting our environment and being a good corporate citizen.

Fostering openness, sustainability, and respect are our key objectives. We value everyoneand strive to work as one team. Our view on ESG is that it is a continuous process of aligning our operations and controls with our values as a company.

The Company commitment to improve our social and environmental performance demonstrates a strong, well-informed management attitude and a values-led culture that is both alert and responsive to the challenges and opportunities of doing business responsibly and sustainably.

10. ESG AND COMPANY REPUTATION

ESG is fundamental to our reputation as a business. Reputation is built through frequentand repeated interactions with stakeholders. When those interactions are positive, our business, and our reputation, can thrive. In an uncertain economic climate, positive reputation is one of the key drivers to long term success.

The Company want all our stakeholders, from customers to our people, to be proud to be a part ofour business. Part of that pride is understanding how our business makes a positive contribution to the world.

- **Environmental** - Environmental sustainability is an ethical and commercial imperative. Managing our carbon footprint goes hand in hand with the strategic necessity to operate efficiently. Our commitment to tackling climate change at a corporate level is fundamental to our strategic objectives.

- **Social** - people make up our business. Intellectual capital is core to our clients,our business model and our long-term sustainability as a business. We aim to fosteran environment that values and nurtures unique talents and contributions from every individual within a culture of inclusivity. While we have progress to make, weare committed to cultivating and empowering change by building an inclusive workplace where all talents can thrive.

- **Governance** - Good governance is foundational to our business, and all aspects ofESG. We cannot thrive without paying attention to our compliance obligations. Ourbusiness seeks to go beyond the concept of 'box-ticking' and embed compliance into the heart of our business.

11. COMPANY RESPONSIBILITY TO OUR CUSTOMERS

The Company have an obligation to our customers to offer them the best service. Customers are atthe heart of our business, and without these partnerships our business wouldn't exist. Part of that commitment to customers is about responding to their needs, hearing their concerns and committing ourselves to customer satisfaction.

The best customers are those who see us as partners in their own enterprise. In turn, those customers reward us with their continued business, and building and maintaining our world-class reputation.

ESG priorities are drawn not only from investor concerns but customer needs. Customersare asking how we are improving the world around us. How are we protecting our sharednatural heritage, investing in our communities and being good corporate citizens? It is imperative on us as a business that all of our interactions with customers are reflective ofwho they expect us to be. And that is a partner in their own enterprise. A company theyare proud to work with and recommend.

That is why it is important for you to understand ESG, its impact and what it means for our company. We want you to feel proud of being part of our business and the positive impactwe have on the world, so that our customers will feel the same.

12. COMPANY ROLE TO PLAY IN ESG

As a member of our business, you have a vital responsibility to ensure our organization thrives. When it comes to ESG, this means understanding your role in each area of ESG.You can start to do this by familiarizing yourself with the concept of ESG, such as throughthis policy and also our strategic objectives around ESG. You should know:

- Our strategic ESG goals
- How we plan to achieve them and over what time
- Your individual and team contribution to those goals
- How to discuss our ESG goals with customers and third parties
- Where to report potential concerns or actions which go against our policy

On an individual level, you have an important role to play in meeting our ESG objectives. Here's how:

- **Environmental** - We all have a role to play in reducing carbon emissions and getting to net zero. While as a business we are setting organization-level targets,consider the choices you make and the environmental impact. For instance:
    - When travelling, are there more environmentally friendly options to take?
    - Can some meetings be done remotely instead of travelling?
    - Think before you print
    - Does the office have recycling and energy saving measures?

- **Social** - Building a diverse and inclusive workforce where everyone feels valued is everyone's responsibility. Understanding your role in bringing people together is critical to our success as a business. From hiring the best talent to encouraging allstaff to thrive, we want a workplace where people proactively work to be the best.You can help by:
    - Challenging and reporting discriminatory or offensive behavior
    - Understanding diversity and inclusion policies
    - Being an active ally for groups often underrepresented
    - Leading by example in your work

- **Governance** - Good governance goes beyond having the right policies and procedures in place. It's about embedding compliance in your day-to-day work. From completing training on time to actively understanding how regulations affect your work, good governance starts from the individual acting ethically. Take governance to heart by:
    - Be a compliance champion in your team
    - Refer to policies and procedures instead of shortcuts
    - Be aware of red flags for compliance failures and risks in your area of work
    - Don't be afraid to call out poor behavior or report failures

13. ESG AND COMPANY VALUE CHAIN

The Company business does not operate in isolation; almost no company does. Value is created through collaboration and partnerships. Similarly, risks can come from not anticipating problems, gatekeeping, and hiding critical information. Traditional risks in supply chains were generally about quality, cost effectiveness and reliability. But seen through an ESGlens, the holistic nature of the third parties, from how they source raw materials to how they treat workers and comply with accepted standards are just as vital.

A workforce health and safety incident, labor dispute or allegation of corruption can haveserious impacts on stakeholders up and down the value chain. The value chain matters, and it is connected. Customers are increasingly voting with their feet and putting pressureon companies to act with ethical decisions in mind.

Ethical procurement gets to the heart of the value chain. When we consider the entire valuechain, from raw material supplier to end use customer, we can better understand the needs and impacts of our business's decisions within those relationships. Ethical procurement within the context of ESG means paying attention to the carbon impacts of a supplier, and the labor practices of an end-user.

Considering these impacts doesn't always mean refusing to work with someone in the value chain where there are concerns. Sometimes suppliers are limited, and customers have every right to access our services. It's about understanding the risks within each relationship and taking concerted action to reduce those risks.

For example, if there are concerns about a supplier's labour practises, we can ensure clauses are inserted into contracts to maintain an adequate standard of employment forthose working for the supplier. This can help actively change labour practises, as opposedto simply refusing to work with a supplier. Or when working with a logistics provider, wemight ask for emissions reporting so we can then offset the carbon used.

14. HOW COMPANY PROCURE ETHICALLY

- **Risk assessments:** Undertake risk assessment of the value chain in order to identify key vulnerabilities based on supplier and customer needs.
- **Real-time tracking:** Real-time tracking and traceability over suppliers and movements of goods and services.
- **Screening, risk-ranking & monitoring:** ESG due diligence on suppliers to evaluate and rank them based on their ESG profile and track record, and monitoring for ESGbreaches.
- **Investigations:** Investigate ESG incidents that take place in the value chain, have remediation plans ready and manage financial and reputational damage.
- **Incident response management:** Build robust internal governance frameworks to respond to ESG issues in the value chain.

15. THE BOARD & ESG COMMITTEE

The purpose of the ESG committee is to gather and review data from broad parts of the business, then filter and summarize it in board meetings. The ESG committee is responsiblefor writing any ESG sections inside the audited accounts and producing all information regarding ESG disclosures.

The aim of the committee is to establish a unified view of ESG, increasing understandingof all three aspects, environmental, social and governance, and to promote robust standards of corporate governance in the advertising industry.

The key objectives of the committee are to:

- Emphasize the importance of environmental measures, sustainability goals and performance, at all levels of the business.
- Provide best practice on the structure, policies and regulations that impact the business.
- Increase understanding and awareness of corporate governance and socialaspects that impact the industry.
- Implement and promote common and workable standards of corporate governance for the business.

16. MONITORING AND ENFORCEMENT

The Company seek to proactively prevent and mitigate instances of non-compliance with this ESG policy.

Any breaches or concerns, including ethical concerns or potential breaches in our commitment to high ethical standards should be reported as soon as possible through Company's authorized channels.

Progress on this policy is reported to the Board on a regular basis. Active participation and engagement at all levels of the business is of great importance to ensure ownership of ESG by all staff. At minimum, we endeavor to maintain compliance with legislative requirements.