

QUALITY POLICY

SPi Global defines and sets the standards in exemplifying the Quality Policy of the organization to reaffirm each employee's commitment to upholding the principles of Quality and Continuous Improvement.

The Quality Policy of SPi Global is as stated below:

**We inspire success in quality standards that:
Surpass customer expectations through continuous improvement;
Promote proactive collaboration and empowered teams;
Create value-adding processes based on systemic approach;
And build equitable and beneficial relationships with various internal and external stakeholders.**

As we move forward with the ISO 9001:2015 standard, the Quality Policy reinforces the seven quality management principles that we adhere to. These serve as a foundation to guide the organization's performance improvement:

- Customer Focus – Understanding the current and future needs of our customers and other relevant interested parties, such as providers, communities, government and non-government organizations, among others, contributes to the sustained success of the organization.
- Leadership – Establishing a unified purpose and direction, and creating conditions in which employees at all levels are engaged in achieving the organization's quality objectives.
- Engagement of People – Competent, empowered and engaged people at all levels are essential to enhancing an organization's capability to create and deliver value.
- Process Approach – Consistent and predictable results are achieved more effectively and efficiently when activities are understood and managed as interrelated processes that function as a coherent system.
- Improvement – An ongoing focus on improvement is essential for an organization to maintain and exceed current levels of performance, to react to changes in its internal and external conditions and to create new opportunities.
- Evidence-based Decision Making – Decisions based on the analysis and evaluation of data and information lead to greater objectivity and confidence in decisions made.
- Relationship Management – Managing relationships with interested parties optimize their impact on an organization's performance.

The Quality Policy must not only be understood, implemented and maintained in all levels of SPi Global, but also serves as the overall intention and direction that guides the organization towards excellence.

Ratan Datta
President and CEO

ENVIRONMENTAL MANAGEMENT POLICY

SPi Global is committed to protecting the environment and will:

- Comply with applicable legal requirements and other requirements related to SPi Global's environmental aspects.
- Pursue business growth with the efficient use of energy and resources.
- Prevent pollution, reduce waste and minimize the consumption of resources.
- Promote environmental awareness by educating, training and motivating employees to carry out tasks in an environmentally responsible manner.
- Encourage environmental protection among suppliers and subcontractors.

SPi Global is committed to continual improvement of environmental performance. This Policy will be constantly communicated to all staff, contractors, and suppliers, and be made available to the public.

The Environmental Policy is understood, implemented and maintained at all levels as being the common direction and commitment to the environment to be adhered to by everyone at SPi Global.

Marie Ampeloquio
Chief People Officer



GENERAL SOCIAL RESPONSIBILITY POLICY

SPi Global is committed to positive change, taking responsibility for the impact we make on the environment and the general welfare of our employees. Our contribution to sustainable development is implemented through social responsibility principles and practices that take into account the needs and expectations of our stakeholders.

In furtherance of our corporate objective of generating wealth and well-being for society, SPi Global adopts a statement of responsible corporate ethics that is contained in the following principles, applicable to all SPi Global offices worldwide and our subsidiaries, within the limits established by law.

In the cases of subsidiaries or acquired companies at which this General Corporate Social Responsibility Policy does not apply, SPi Global shall promote, through our representatives at such companies, the alignment of their own policies so that these are consistent with the principles established in this General Corporate Social Responsibility Policy, and its supplemental Social Responsibility Policies, when applicable.

Said principles stipulate:

- Compliance with all government regulatory requirements applicable in the countries in which SPi Global does business, with the supplemental adoption of international provisions and guidelines in those countries in which the legal framework is inadequate.
- Adherence to established best-business practices including, but not limited to, the Quality Management System (QMS), Information Security Management System (ISMS), Environmental Management System (EMS), Sarbanes-Oxley (SOX), Health Insurance Portability & Accountability Act (HIPAA), PCI DSS (Data Security Standard), and Lean Six Sigma (LSS).
- Upholding of Good Governance in accordance with the highest standards of ethics. SPi Global will continue to promote a culture of good corporate governance in line with best practices generally recognized in international markets; observing and maintaining our core business principles of accountability, integrity, fairness, and transparency in our relationships with ourselves and with our customers, suppliers, competitors, business partners, governments, regulators, and the public.
- Advocate respect for human rights; ensuring, in particular, that no violations will degrade workers, nor child and/or forced or compulsory labor.
- Establishment of a favorable employment relationship framework based on equality of opportunity, non-discrimination, and respect for diversity; promoting a safe and healthy environment and facilitating communication with our workforce.
- Strict observance of responsible practices across the value chain, establishing transparent, objective, and impartial processes with suppliers/subcontractors, and providing users with all relevant information regarding products and services sold.
- Promote a culture of respect for the natural environment, reducing the environmental impact of any SPi Global activity, defending biodiversity, and fostering information and training in this culture.
- Transact with transparency according to free market rules; rejecting bribery, corrupt practices, or other types of contributions aimed at obtaining corporate advantages, and respecting the rules of free competition.
- Exercise socially-responsible actions where SPi Global has control or management capacity, and also the advancement of such actions on our suppliers/subcontractors, through the processes of selection and hiring.
- Actively participate in dialogue with the various groups related to SPi Global's business activities, in order to match corporate values and social expectations.
- Disseminate relevant and truthful information regarding activities carried out, and the subjection of such information to internal and external verification procedures that ensure its veracity and drive the continuous improvement thereof.

SPi Global's Senior Management is responsible for formulating the strategy and the general policy guidelines for SPi Global's Social Responsibility Policy.

SPi Global's Head of Quality is our designated Social Compliance Representative (SCR). The SCR is responsible for ensuring full compliance with the guidelines stated herein.

Marie Ampeloquio
Chief People Officer

INFORMATION SECURITY POLICY

SPi Global is committed to provide management direction and support for Information Security, in accordance with business requirements and relevant laws and regulations, to preserve the Confidentiality, Integrity and Availability of all its information assets. It aims to do this by:

- Ensuring that the principles of Information Security are consistently and effectively applied in line with SPi Global's business strategy and objectives;
- Developing, maintaining, continuously monitoring and improving the effectiveness of Information Security Management System (ISMS);
- Establishing risk management and information security incident management processes;
- Ensuring that adequate resources are applied to implement an effective ISMS to minimize risks to the company;
- Promoting an appropriate level of information security consciousness that permeates SPi Global's employees, contractors and third-party users ("collectively termed as authorized users"), its engagements with clients and business partners; and
- Ensuring the continuity of SPi Global's business operations and services to its customers and business partners.

This policy applies to all authorized users of SPi Global. It encompasses all information stored, processed and transmitted over the environment, system and network of SPi Global, necessary for the company's business operations.

SPi Global authorized users shall achieve and maintain compliance with the requirements defined in this policy.

SPi Global shall also comply with its contractual requirements and information security-related obligations to its clients and business partners.

Failure to comply with the rules set out in this policy and any relevant policies and standards may result in disciplinary action.

Kumar-Subramaniam
Head, Information Technology
SPi Global