



## ENVIRONMENTAL POLICY

EXTERNA

Drafted by		Approved by		Version	
Responsible body	Date	Responsible body	Date	Version	Date
Compliance Committee	11/11/2020	Governing body	29/04/2021	1	29/04/2021

 **WORLD W SENSING**  
Worldsensing S.L.  
NIF B64902208

### Control of changes

Version	Date	Author	Summary of changes
1	11/11/2020	Compliance Committee	Version 1

### Table of contents

1. INTRODUCTION .....	3
2. PURPOSE.....	3
3. REGULATIONS.....	4
4. SCOPE OF APPLICATION .....	5
5. ENVIRONMENTAL ANALYSIS .....	6
6. METHODOLOGY .....	6
7. PLANNING ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES.....	7
8. OVERSEEING AND REVIEWING THE EFFECTIVENESS OF THE MEASURES. CONTINUOUS IMPROVEMENT. ....	7

## 1. INTRODUCTION

Worldsensing, S.L. (hereinafter, WORLDSENSING or the Organisation) designs, manufactures and sells technological products. Those products comprise hardware (partly designed by WORLDSENSING and manufactured by its suppliers) and software. Moreover, in the course of manufacturing its technological products, WORLDSENSING can manipulate products and components purchased from suppliers.

Consequently, WORLDSENSING has decided to implement a policy that regulates the establishment of objectives and goals, the periodic assessment of the environmental management system, and the adoption of the necessary measures to prevent environmental risks and limit their impact on the environment.

WORLDSENSING is and wants to be a company committed to the environment by contributing, as far as possible and within its scope of action, to reducing our planet's waste and pollution. Therefore, article 6 on environmental protection of the company's Code of Ethics expressly states the following:

*"1. Worldsensing carries out its activity with respect for the environment, meeting or exceeding the standards established in the applicable environmental regulations and reducing the impact of its activities on the environment.*

*2. Worldsensing wants to contribute in any way it can to the environmental improvement of the planet and this principle will always be the basis of its work on innovation, its decision-making and the implementation of its projects and work."*

As an ancillary service to the sale of technological products, WORLDSENSING provides advisory and supervision services on how to install the products in the end users' infrastructure; in that activity, it must also be environmentally friendly.

## 2. PURPOSE

This Policy is aimed at projecting internally, and to all the WORLDSENSING stakeholders, its vocation of being committed to environmental protection, including pollution prevention, sustainable resource use, and climate change mitigation and adaptation.

To that end, WORLDSENSING'S governing body considers the environment as a core element of the concept of sustainability and, in particular, one of the three cornerstones for meeting the levels of compliance and safety required. That compliance and commitment culture must pervade all the company's decisions and permeate the culture of its managers and employees.

WORLDSENSING has always been characterised for being an innovative technology company, and the idea is to use that technological and innovation capability in favour of the planet's environment and preservation, starting by reducing the environmental impact of certain components of the products manufactured and ending by providing solutions, creations, innovations, developments and inventions which could have an environmental impact on our society.

### 3. REGULATIONS

Firstly, we must check the European regulations on environmental management and audits, specifically Regulation (EC) 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS). In parallel, WORLDSENSING states that the assemblers of its devices are certified in accordance with the ISO 14001:2015 standard on Environmental Management Systems and, consequently, this document complies with the requirements and guidelines of that international standard.

Secondly, we must focus on the Spanish regulations, especially those relating to criminal law, which regulates environmental crimes, mainly articles 325 to 331 of the Spanish Criminal Code, and pay attention to the activities which may affect WORLDSENSING. We highlight the following articles transcribed below:

“Article 325.

1. Anyone who, in breach of the laws or other general provisions to protect the environment, directly or indirectly causes or makes emissions, discharges, radiations, extractions or excavations, filling with earth, noises, vibrations, injections or deposits, in the atmosphere, the ground, the subsoil or the surface water, ground water or sea water, including the high seas, even affecting cross-border spaces, as well as water catchment basins, that, either individually or in combination with others, cause or may cause substantial damage to the quality of air, soil or water, or to animals or plants, shall be punished with a term of imprisonment of between six months and two years, a fine from ten to fourteen months and special barring from a profession or trade for a period ranging from one to two years.

2. If the above practices, either individually or in combination with others, are likely to seriously damage the balance of natural systems, a term of imprisonment of between two and five years, a fine of eight to twenty-four months and special barring from a profession or trade for a period ranging from one to three years shall be applied.

If there is a risk of serious damage to human health, the term of imprisonment shall be in the upper half of the range, up to the maximum.

Article 326.

1. The penalties provided for in the previous article shall be applied, in their respective cases, to anyone who, in breach of the laws or other general provisions, collects, transports, recovers, converts, disposes of or makes use of waste, or fails to adequately monitor or supervise such activities, such that they cause or are likely to cause substantial damage to the quality of air, soil or water, or to animals or plants, death or serious injury to any person, or are likely to seriously damage the balance of natural systems.

2. Anyone who, other than in the case referred to in the previous paragraph, ships a significant quantity of waste, either in a single shipment or in several shipments that appear to be linked, in any of the cases referred to under European Union waste shipment law, shall be liable to a term of imprisonment of between three months and one year, or a fine of six to eighteen months and special barring from a profession or trade for a period ranging from three months to one year.

Article 326 bis.

The penalties provided for in article 325 shall be applied, in their respective cases, to anyone who, in breach of the laws or other general provisions, operates a plant in which a dangerous activity is carried out, or in which hazardous substances or preparations are stored or used, such that they cause or are likely to cause substantial damage to the quality of air, soil or water, or

to animals or plants, death or serious injury to any person, or are likely to seriously damage the balance of natural systems.

Article 327.

A punishment higher in one degree shall be imposed, without prejudice to those that may be appropriate pursuant to other provisions of this Code, when commission of any of the acts described in the preceding Article takes place with any of the following circumstances concurring:

- a) When the industry or activity is operating unlawfully, without having obtained the requisite authorisation or administrative approval of its facilities.
- b) When the specific orders by the administrative authority on correction or suspension of the activities described in the preceding Article have been disobeyed.
- c) When information on the environmental aspects thereof has been forged or concealed.
- d) When the inspection activity of the Administration has been hindered.
- e) When a risk of irreversible or catastrophic deterioration has ensued.
- f) When there has been unlawful extraction of water during a period of restrictions.

Article 328.

When, pursuant to the terms established in Article 31 bis, a legal person is responsible for the offences established in this chapter, it shall have the following penalties imposed thereon:

- a) Fine of one to three years, or double to quadruple the damages caused where the resulting amount is higher, if the crime committed by the natural person carries a penalty of more than two years' imprisonment.
- b) Fine of six months to two years, or double to triple the damages caused if the resulting amount is higher, in all other cases.

Pursuant to the rules established in Article 66 bis, the Judges and Courts of Law may also impose the penalties established in Sub-Sections b) to g) of Section 7 of Article 33.

Article 330.

Whoever seriously damages any of the elements of a protected natural space that were used to classify it as such, shall incur a sentence of imprisonment from one to four years and a fine of twelve to twenty-four months.

Article 331.

The acts foreseen in this Chapter shall be penalised, as appropriate, by the lower degree punishment, in their respective cases, when committed by serious negligence."

## 4. SCOPE OF APPLICATION

This policy's values and objectives are shared by WORLDSENSING'S governing body, senior management and all its workforce. Nevertheless, the departments especially affected by its implementation are as follows:

- Legal & Compliance
- Engineering
- Human Resources (HR)
- Customer Operations (COPS)

- Information Technology (IT)
- Customer Success (CSI)
- Finance

## 5. ENVIRONMENTAL ANALYSIS

The main practices which may increase the risk of environmental damage to the Organisation are as follows:

- a) The use of certain components or materials in its products. For example, especially at present, the use of lithium-ion batteries or other pollutants in WORLDSENSING'S products.
- b) The waste generated by the activity itself at WORLDSENSING'S facilities, or by the subcontractors, even though it may not be considered to be hazardous or toxic waste because it is basically scrap, cardboard or other hardware or packaging materials.
- c) The waste that may be generated at WORLDSENSING'S offices.

## 6. METHODOLOGY

WORLDSENSING'S environmental management system is based on the concept of PDCA (Plan-Do-Check-Act):



- **Plan:** establish the environmental objectives and the processes required to generate and deliver the results in accordance with the Organisation's environmental policy,
- **Do:** implement the processes as planned,

- Check: monitor and measure the processes regarding the environmental policy, including the commitments, environmental objectives and operational criteria, and report the results,
- Act: take actions to ensure continuous improvement.

## 7. PLANNING ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

WORLDSENSING must establish, implement and maintain the actions required to comply with its environmental objectives and mitigate the potential adverse environmental risks and/or impacts stated above.

The actions planned, the evidence justifying them, the competent departments and the implementation deadlines are detailed in internal documents.

## 8. OVERSEEING AND REVIEWING THE EFFECTIVENESS OF THE MEASURES. CONTINUOUS IMPROVEMENT.

The effectiveness of the controls must be overseen by the Legal Area Officer and the Compliance Committee.

The monitoring and review process will enable WORLDSENSING to:

- Make sure that the design and use of the controls established are effective and efficient by monitoring their performance and the results obtained,
- Achieve the financial and operational benefits which may result from implementing environmentally respectful options that strengthen the Organisation's market position, and
- Continuously improve the suitability, adequacy and effectiveness of the environmental management system aimed at meeting the planned objectives and mitigating the potentially adverse effects on the Organisation's environmental conditions.