



CLEOPATRA

Total Project & Turnaround
Management Platform

Cleopatra Enterprise

Sustainability Policy

Crafting a sustainable future, one project at a time.



Organizational Commitment to Sustainability

At Cleopatra Enterprise, our commitment to sustainability is part of our organizational values and practices. We are on a mission to empower clients to achieve project success while holding ourselves accountable for performing ethical and responsible business practices.

As part of our commitment, we align our efforts with the [Sustainable Development Goals \(SDGs\)](#) outlined in the UN 2030 Agenda. We recognize the interconnectedness of these goals and their importance in driving positive change. By integrating the SDGs into our sustainability strategy, we aim to play a meaningful role in contributing to broader sustainability efforts and initiatives.

Beyond our ambitions to comply with international standards, we are driven by our core values of ownership, learning, and improvement, and passion makes perfect, as the force behind achieving perfection. Furthermore, we value our core value of communication as the key to sharing our sustainability efforts. Aligned with these values, we contribute to the transition towards sustainable behavior in today's business environment. Our expertise in digital innovation within the total project and turnaround management landscape allows us to combat climate change and move to a greener, more sustainable world.

Scope

Our Sustainability Policy is structured around environmental care, corporate social responsibility, and ethical governance. Additionally, we recognize the growing importance of cybersecurity. That is why a section of our policy covers data sustainability to highlight that we prioritize data privacy and security to fulfill and protect our customer's requirements and interests.

Intent

Our purpose is to build trust with employees, clients, and partners, which means that transparency and honesty are at the heart of communicating our sustainability initiatives. We understand the evolving demands of sustainable business practices and services, and we are dedicated to creating positive and lasting environmental impacts and long-term values for all stakeholders.

We aim to foster a healthy atmosphere through responsible environmental, social, and governance strategies outlined in this policy while upholding the integrity of our products and services.

To drive progress, we have established a team focused on realizing sustainable objectives, continuously improving our projects, and initiating fresh ideas surrounding the energy transition.

Environmental Care

Commitment to Sustainable Practices

At Cleopatra Enterprise, we focus on reducing our environmental footprint and contributing positively to society. We aim to be a trusted partner in delivering sustainable solutions for our customers. We implement environmentally sustainable activities by stimulating more environmentally conscious behavior. We support our clients' sustainability journey, particularly in energy transition initiatives.

We are increasing our involvement in sustainable projects:

- Supported by our sustainable objectives team, we expand the Cleopatra Enterprise Standard Knowledgebase (CESK) to include sustainable products such as offshore wind energy, solar, carbon capture, and hydrogen. Supported by our sustainable objectives team
- By exploring innovative solutions in renewable energy, hydrogen, clean mining, and solar projects.



CESK enables our clients to:

- Support estimating new energy projects;
- Compare alternative activities based on emissions;
- Optimize projects to lower emissions and costs;
- Facilitate the CO2 calculations for carbon credits.

Sustainable Office Initiatives

We encourage sustainability within our organization through office-related environmental initiatives. This way, we empower employees to make positive environmental choices daily. Such accessible office initiatives not only benefit the environment but also lower energy costs, enhance the well-being of our employees, and ignite a more climate-conscious approach.

In the office:

- We are adhering to the three R's - **reduce, reuse, recycle** - to minimize the waste we produce. We reuse mugs and glasses, have recycling bins in place, and have a (near) paperless office.
- We brighten up our office by adding enough air-filtering plants. Plants make the workspace's air healthier and cleaner to breathe so that everyone can enjoy the benefits of nature.
- We are choosing sustainable suppliers and green products for our office. For example, our coffee is Rainforest Alliance and UTZ certified.

Daily commute:

- We facilitate traveling and commuting by public transport and allow employees to have their costs reimbursed for their commute and opt for the most energy-efficient mode of transportation. In 2023, around 40% of our employees commuted by public transport.
- We have a Work From Home Policy. Employees can perform their work duties from home, without traveling to and from the office. This saves transportation emissions, costs and can have a positive impact on the work-life balance for employees.
- We are transitioning our car fleet from petrol-based to electric vehicles. By providing our employees with electric vehicles, we reduce their transport carbon emissions and support a healthier local ecosystem.

Our partner program:

- Part of our partner program focuses on further reducing flight emissions. Partners can work for the organization worldwide while also fostering local employment opportunities.
- We utilize online communication for training and international partnerships that lower the need for traveling to and from the Netherlands.

Data Sustainability and IT Management

Technological Infrastructure

- We have carefully evaluated our supply chain in our technological infrastructure and opted for server and storage systems from [Microsoft Azure](#) for maximum efficiency and their strong commitment to sustainability. Microsoft Azure has been carbon-neutral since 2012 and is committed to being carbon-negative by 2030. Their sustainable cloud technology includes new server cooling methods and grid-interactive UPS batteries to reduce their carbon footprint. Furthermore, they transitioned from traditional diesel to less carbon-intensive fuels to run data center backup generators.

- Our cloud hosting servers are hosted in the Netherlands and globally by Microsoft Azure. The Dutch host only uses green energy. With a Data Center Infrastructure Efficiency (DCIE) of 78.7%, higher than the Netherlands' required standard (76.9%), our hosting provider shows a strong commitment to the energy efficiency of data center operations.

Information Security Management System (ISMS) & ISO/IEC 27001

We operate an Information Security Management System to safeguard data. The scope of our ISMS covers the development and maintenance of project cost management software, delivering, maintaining, and managing cloud-based implementations.

[ISO 27001](#) is the internationally recognized [standard in information security](#). The standard describes how to process information security in a process-based manner. Being ISO 27001 certified, Cleopatra Enterprise ensures the ISMS meets all requirements to protect sensitive data and avoid cybersecurity risks effectively.

Objectives of our ISMS implementation include:

- To increase system and information reliability and security.
- To improve and unify Risk Management related to information technology.
- To align with customer requirements.
- To improve management processes and integration with corporate risk strategies.

We ensure robust **security measures**:

- The hosting and administering of services around the world are compliant with local privacy regulations, such as the General Data Protection Regulation (GDPR) in the EU and the California Consumer Privacy Act (CCPA) in the US. In combination with documented information security policies, standards, and procedures governing all security controls for the supplied services.
- We implement IT security policies for our employees to reduce risks to our business and clients, including clear desk/screen and teleworking policies and a security incident policy.
- We provide security awareness training for all employees on their first day of work and yearly after that to reduce the chances of human error risks.
- We limit employee access to only relevant information and documentation to minimize cybersecurity vulnerabilities.
- We focus on security requirements to meet customer expectations and build, maintain, and continuously improve our ISMS.

Corporate Social Responsibility

Inclusion and Diversity

We promote **diversity and inclusion** within the organization and support a culture of belonging. We have employees from many different backgrounds. Our team consists of more than 15 nationalities across nine departments, with approximately 30% female and 70% male employees. Additionally, we uphold **diversity on our board of directors**: Half of the directors is female. **Embracing diversity** brings various points of view, ideas, cultures, and lifestyles, positively influencing our understanding of the world.

Employee Well-Being

Investing in the well-being of our employees benefits everyone, from a healthy work-life balance to increased morale and a supportive workplace culture. Our HR department, with the support of the team, leads and maintains regular communication with all employees to **ensure equal treatment and assistance** where needed. During those check-ins, we focus on well-being rather than performance. They allow employees to share their experiences and expectations, helping company-wide improvements. These meetings are more frequent during the first year of employment as part of our onboarding and to align expectations. Additionally, we provide resources such as a confidential counselor and mental health coach to **support employee wellness**.

Safe Work Environment

We are committed to **a safe and respectful work environment** for all employees, aligning with health, safety, and environmental (HSE) standards. Management is held accountable for creating a safe work environment from recruitment onwards, encouraging inclusivity and non-discrimination throughout the hiring process. We emphasize ongoing awareness through measures like providing non-biased training for interviewers. With a zero-tolerance policy for inappropriate behavior, including harassment and discrimination, employees are encouraged to report any concerns to HR, which will handle complaints with discretion and care.



Community Engagement

We aim to source office needs locally and cost-efficiently, partnering with eco-friendly suppliers and contributing to the circular economy. By supporting local suppliers and those with environmental certifications, we hope to leave a positive impact on the communities we operate in. Through our partner program, we reduce the need for travel movements and create job opportunities in areas where we expand our operations. We invest in training our partners and contributing to economic growth and development in international communities where we are present.

Ethical Governance

Ethical Conduct

We are committed to **conducting business with integrity, honesty, and transparency.** Our code of conduct outlines our expectations of employees and anyone representing Cleopatra Enterprise for interactions, including anti-bribery and anti-corruption measures. We have a zero-tolerance policy towards corruption and bribery, led by integrity and fair dealings. Each employee is responsible for avoiding the organization's involvement in such practices. Our governance practices and HR policies ensure employees act with integrity, transparency, and accountability, while company regulations contain all information on employees' rights, responsibilities, and an emergency plan.



Legal Compliance

As a NEN 4400 certified organization, we demonstrate strong business processes, financial integrity, and fair treatment of employees, paying them and our suppliers on time. Our consultants are VCA certified, short for Veiligheid, gezondheid en milieu Checklist Aannemers (Safety, Healthy, and Environment Checklist Contractors). This certification demonstrates our commitment to keeping a healthy and safe work environment while minimizing environmental impact. It also ensures our consultants comply with the Occupational Health and Safety law (Dutch Arboret).

Accountability

We **uphold accountability** through our Whistleblower Policy, which is part of our Integrity Policy. This policy empowers employees to report suspected malpractices confidentially to an external advisor. Employees are protected from prejudice or disciplinary actions. Additionally, we protect the identity of whistleblowers and outline a clear roadmap for addressing formal complaints to ensure transparency and accountability throughout the process.

Human Rights

Cleopatra Enterprise is committed to maintaining a fair, ethical, and supportive work environment for everyone involved with our company. **We adhere to Article 4 of the European Convention on Human Rights**, ensuring no employee or hired staff performs forced or compulsory labor. Our Company Regulations encompass working hours, overtime compensation, (paid) sick leave, ergonomics and notice periods. All employees, including part-time and fixed term, receive equal pay and pro-rata entitlements, regardless of gender, religion, race, or any other factors. Our competitive remuneration package includes additional benefits like an education budget, travel compensation, and various office initiatives related to vitality and a positive employee experience.

Employees are encouraged to report any suspicion of modern slavery to our confidential advisor. Cleopatra Enterprise has not, to its knowledge, conducted any business with another organization which has been found to have involved itself with slavery and/or human trafficking. Our commitment to SDG 8 reflects our dedication to promoting inclusive and sustainable economic growth, employment, and decent work for all.

