

# Enfactum Social & Environmental Responsibility (SER) Policy

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Approved by: Ajay Mohan

Policy Owner: Ajay Mohan

Applies to: All Enfactum entities, employees, interns, contractors, and suppliers across Singapore, India, Malaysia, and all other operating locations.

## 1) Purpose & Scope

Enfactum is a marketing services company. Our social and environmental footprint is primarily driven by people, digital tools, travel, events, and our supply partners. This policy establishes pragmatic, businessaligned standards to manage our impacts, meet legal obligations, and create value for clients and communities, while reducing risk and cost.

Scope includes: labour & human rights, diversity, equity & inclusion (DEI), health & safety, data & AI ethics, ethical marketing, sustainable procurement, climate & environment (energy, cloud, travel, events, waste), anti-corruption, community impact, and governance.

## 2) Our Commitments (Plain-English Summary)

- 1. Do no harm:** Comply with applicable laws and reject forced labour, discrimination, corruption, and unsafe work.
- 2. Market responsibly:** Avoid misleading claims, stereotypes, and harmful content; protect privacy and IP.
- 3. Reduce emissions:** Prioritise avoid → reduce → then offset for our operational and event-related footprint.
- 4. Respect people:** Provide fair opportunities, prompt pay, and safe, respectful workplaces—including for freelancers.
- 5. Build with partners:** Set clear expectations for suppliers; prefer greener, more ethical options where practical.
- 6. Be transparent:** Track key metrics, publish progress annually, and enable safe grievance reporting.

### 3) Governance & Accountability

- Board/CEO: Oversight and annual review.
- SER Manager (Policy Owner): Implements this policy, sets targets, publishes the SER Report, and manages audits.
- Function Leads (People, Finance, Delivery, Creative, IT): Own KPIs relevant to their functions.
- All Staff & Contractors: Follow this policy; complete required training; report issues.
- Escalation: SER@enfactum.com → SER Manager → CEO/Board Audit Committee.
- Review Cycle: Annual (or earlier on legal/operational change).

### 4) Labour, Human Rights & DEI

- **Standards:** Uphold ILO core conventions; no forced, bonded, or child labour; no harassment, discrimination, or retaliation.
- **Equal Opportunity:** Hiring, pay, progression based on merit; reasonable accommodation for disabilities.
- **Fair Pay & Prompt Payment:** Comply with all wage laws; pay freelancers and suppliers within agreed terms (default  $\leq 30$  days) unless contractually specified.
- **Working Hours & Wellbeing:** Respect legal limits and rest; promote mental health resources and flexible work.
- **Freedom of Association:** Respect lawful worker representation.
- **DEI Goals:** Improve gender balance in leadership roles; ensure inclusive language and representation in content.

## 5) Health, Safety & Wellbeing

- **Office/Remote Safety:** Provide ergonomic guidance, incident reporting, and emergency contacts.
- **Event Safety:** Require risk assessments, venue safety checks, and vendor compliance; ensure accessibility (ramps, captions, dietary needs).
- **Travel Safety:** Prefer reputable carriers; follow country advisories; ensure appropriate insurance.

## 6) Ethical Marketing Standards

We commit to responsible creative, media, and communications work.

- **Truthful, Substantiated Claims:** Use credible data; avoid greenwashing or unverified sustainability claims.
- **Respect & Inclusion:** Avoid harmful stereotypes; ensure diverse, dignified representation.
- **Audience Protection:** No targeting that exploits vulnerable groups; label paid content transparently.
- **Accessibility:** Apply WCAG-aligned practices to web content we design or manage.
- **Client Counsel:** Flag ethical risks; propose compliant alternatives.

### Creative/Content Checklist (must-use before release):

- 1) Evidence for claims logged;
- 2) IP licenses cleared;
- 3) privacy notices/cookies correct;
- 4) inclusive imagery/language;
- 5) accessibility basics checked;
- 6) AI-generated content labelled where appropriate;
- 7) No illegal/unsafe instructions.

## 7) Data Privacy, Security & AI Ethics

- **Privacy & Security:** Comply with applicable laws (e.g., Singapore PDPA, Malaysia PDPA, India DPDP, GDPR where relevant). Client data used only for agreed purposes; minimum necessary retention; secure storage; timely deletion on request/expiry.
- **AI Use:** Encourage responsible AI to improve productivity and creativity. Prohibit training on client confidential data without written consent. Avoid biased or harmful outputs. Disclose material use of generative AI where appropriate and manage IP risks (model licenses, content provenance, watermarking where feasible).
- **Incident Response:** Report suspected data incidents within 24 hours internally; cooperate with clients and authorities as required.

## 8) Environmental Management (Pragmatic Focus Areas)

**Boundary:** Our significant impacts are Scope 2 electricity (offices) and Scope 3 (business travel, events, purchased goods/services, cloud & digital).

### 1. Energy & Offices

- Prefer energy-efficient buildings; use LED lighting and smart power settings.
- Where available & cost-reasonable, procure renewable electricity or RECs for offices.
- Encourage responsible home-office practices for remote staff (guides + stipend where approved).

### 2. Travel

- Virtual-first by default; travel only when outcomes justify.
- Prefer rail over short-haul flights where feasible; economy class by default; offset remaining emissions annually after reduction efforts.
- Consolidate trips; set internal approvals for long-haul travel.

### 3. Events & Productions

- Use venues with environmental policies; minimise single-use plastics; provide water stations; manage waste sorting.

- Prefer digital collateral; if printing is required, use FSC-certified, recycled paper and HP inks.
- Plan low-waste catering (plant-forward options; accurate headcounts).
- Capture event footprint and lessons learned in the Close-Out Report template.

#### **4. Digital & Cloud**

- Optimise asset sizes; avoid unnecessary ad-tech bloat; prefer greener cloud regions if practicable.
- Use vendors with published sustainability practices; request quarterly usage reports where available.

#### **5. Waste & Procurement**

- Reuse/repair electronics; donate responsibly at end-of-life; follow e-waste rules.
- Reduce waste; when used, prioritise durable/recycled materials, and support ethical suppliers.
- Cater for reusables at offices/events; provide sorting guidance.

### **9) Sustainable Procurement (including Freelancers)**

- Supplier Code: All suppliers (incl. freelancers, studios, and event vendors) must accept Enfactum's Supplier Code of Conduct (see Appendix A).
- Screening: For material spends, assess suppliers on labour practices, environmental policies, data security, and legal compliance.
- Preference: All else equal, prefer suppliers with better SER performance (certifications, diversity ownership, local sourcing, eco materials).
- Contracts: Include compliance, audit, and remediation rights; anti-bribery; data protection; IP; confidentiality; and timely payment terms.

## 10) Anti-Corruption & Fair Competition

- Zero tolerance for bribery, kickbacks, facilitation payments, fraud, money-laundering, market abuse, and conflicts of interest.
- Gifts/hospitality must be modest, lawful, accurately recorded, and never to obtain improper advantage.
- Disclose and manage any potential conflicts (e.g., family relationships with vendors).
- Keep books and records accurate and complete.

## 11) Compliance

We comply with applicable laws in our operating locations and with client contractual obligations. Where standards differ, we apply the higher bar where reasonably practicable. This policy integrates guidance consistent with widely recognised frameworks (e.g., UNGC, ILO core conventions, ISO 26000, GHG Protocol) adapted for a marketing-services context.

## 12) Exceptions

Any exception to this policy requires written approval by the SER Manager / CEO, recorded in the Exceptions Register with mitigation steps and expiry.

## Appendix A —

# Supplier Code of Conduct (Summary)

Applies to all suppliers, subcontractors, freelancers, and their sub-suppliers used for Enfactum work.

- 1. Legal Compliance:** Follow all applicable laws, including labour, EHS, anti-corruption, competition, privacy/data, and IP.
- 2. Labor & Human Rights:** No forced/child labor; fair wages/benefits; safe, respectful workplaces; non-discrimination; working hours in line with law. Respect freedom of association.
- 3. Health & Safety:** Identify and control hazards; provide PPE and training; emergency preparedness.
- 4. Environment:** Manage energy, emissions, waste, water; avoid hazardous substances; minimise single-use items; comply with e-waste rules.
- 5. Ethics & Integrity:** Prohibit bribery, kickbacks, and conflicts of interest; accurate books and records.
- 6. Data Protection & Security:** Protect Enfactum/client data; use only for contracted purposes; notify of incidents promptly.
- 7. Subcontracting:** Obtain approval for material subcontracting; flow down this Code to subs.
- 8. Audit & Corrective Action:** Cooperate with assessments; implement corrective actions; material breaches may lead to termination.

## Appendix B —

### Event Sustainability Checklist (Highlights)

- The venue has environmental and accessibility policies, including energy-efficient lighting/HVAC systems.
- Digital-first collateral; if print required, use FSC/recycled and soy inks; right-size quantities.
- Reusables and sorting stations; no single-use plastic bottles; water dispensers.
- Plant-forward menus; accurate headcount; donate surplus where lawful.
- Track travel and on-site energy to estimate footprint; include in Close-Out Report.

#### **Event Sustainability Checklist**

This checklist outlines key considerations for ensuring the environmental and social responsibility of our events. Adhering to these guidelines will help minimise our ecological footprint and promote an inclusive and accessible experience for all attendees. Venue Selection & Operations

- **Environmental and Accessibility Policies:** Prioritise venues that demonstrate a commitment to sustainability and accessibility. This includes having clear policies in place for energy efficiency, waste management, and water conservation, as well as a commitment to creating an inclusive environment for individuals with diverse needs. Look for certifications or accreditations that validate their efforts.
- **Energy-Efficient Infrastructure:** Confirm that the venue utilises energy-efficient lighting systems (e.g., LED), HVAC (heating, ventilation, and air conditioning) systems, and other appliances. Inquire about their use of renewable energy sources or participation in green energy programs.

#### **Materials & Collateral**

- **Digital-First Approach:** Embrace a digital-first strategy for all event collateral, including invitations, agendas, presentations, and feedback forms. Utilise online platforms, QR codes, and event apps to disseminate information, significantly reducing the need for print materials.

- **Sustainable Printing Practices:** If printed materials are absolutely necessary, ensure they are produced responsibly.
  - **FSC/Recycled Paper:** Use paper certified by the Forest Stewardship Council (FSC) or made from a high percentage of post-consumer recycled content.
  - **Soy-Based Inks:** Opt for soy-based or other vegetable-based inks, which are more environmentally friendly than traditional petroleum-based inks.
  - **Right-Size Quantities:** Accurately estimate the required quantities to avoid overprinting and subsequent waste.

### Waste Management & Hydration

- **Reusables and Sorting Stations:** Implement a comprehensive waste management plan that prioritises reduction, reuse, and recycling.
  - **Reusable Tableware:** Encourage the use of reusable plates, cutlery, and cups. Partner with catering services that offer these options.
  - **Clearly Labelled Sorting Stations:** Provide easily identifiable and well-maintained sorting stations for compostables, recyclables (paper, plastic, glass), and general waste. Educate attendees on proper waste separation.
- **Eliminate Single-Use Plastic Bottles:** Strictly prohibit the use of single-use plastic water bottles.
- **Accessible Water Dispensers:** Ensure ample and easily accessible water dispensers are available throughout the venue, encouraging attendees to bring their own reusable water bottles.

### **Food & Beverage**

- **Plant-Forward Menus:** Design menus that are predominantly plant-based, reducing the environmental impact associated with meat production. Offer diverse and appealing Halal, vegetarian and vegan options as the default, with meat options as supplementary choices if necessary.
- **Accurate Headcount:** Work closely with caterers to provide an accurate headcount, minimising food waste. Utilise RSVPs and other registration data to inform catering numbers.
- **Donate Surplus Food:** Where permissible by law and health regulations, establish partnerships with local food banks or charities to donate any surplus edible food.
- **Include in Close-Out Report:** All gathered sustainability data and estimated footprint should be meticulously documented and included in the event's Close-Out Report. This report should also highlight successful sustainable initiatives and areas for future improvement.

## Appendix C

### — Ethical Marketing & AI Checklist (Abbreviated)

- Claims substantiated; no deceptive or unverified environmental claims.
- Inclusive representation; avoid stereotyping; accessibility basics (alt-text, captions, contrast).
- Data consent and cookie notices appropriate to the market; age-appropriate targeting.
- AI content labelled where material; IP/licensing checked; watermarking/provenance where feasible.
- Final legal and privacy review complete prior to release.

## Appendix D – Glossary

- SER: Social & Environmental Responsibility.
- DEI: Diversity, Equity & Inclusion.
- FSC: Forest Stewardship Council.
- ILO: International Labour Organisation.
- GHG Protocol: Greenhouse Gas Protocol for emissions accounting.
- DPDP: India's Digital Personal Data Protection Act.