

Document Control	Reference:	DOC	FACILITIES
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	Sensitivity:	Confidential	

Environmental Sustainability Policy

1.0 Overview

As a global leader of cyber security services and solutions, we view the minimizing of our impact on the environment and climate change, as a key business principle.

This Policy applies to all Sophos businesses, employees and contractors wherever they are conducting work for and on behalf of Sophos globally. By focusing on a holistic approach, our goal is to ensure prudent stewardship across our operations to limit our climate and environmental impacts. We also recognize that we have a role to play in communicating sound environmental practices to all our stakeholders.

Further, Sophos is committed to the principles embodied in the Responsible Business Alliance (RBA) Code of Conduct 7.0 (2021). This commitment is key to the Company's business strategy, informs our decision making at all levels, and is core to the Company operating procedures. Specifically, Sophos' environmental responsibility is integral to producing world class products, which requires that adverse effects on the community, environment, and natural resources shall be reduced, if not removed.

2.0 SCOPE

[X] All Sophos Companies

[X] Domestic Sophos Companies (in the UK, U.S. and Canada)

[X] International Sophos Companies

[] Other (describe:)

3.0 RESPONSIBILITY

Executive Vice President Human Resources Officer

- Primary responsibility for this policy.

Corporate Responsibility Committee

- Implementation of the Environmental Sustainability Policy across the business and engagement with stakeholders;

Global Facilities Director

Directly oversee Environmental Sustainability Policy management and auditing (responsibility designated by EVPHRO).

4.0 POLICY

Sophos and our Corporate Responsibility Committee will work with employees, partners, suppliers and clients to deliver the objectives set out in this policy. In order to accomplish these objectives, Sophos will:

- **Compliance obligations** - Meet or exceed all applicable compliance obligations (voluntary and mandatory) and other requirements to which Sophos subscribes.
- **Protect the Environment** – Sophos commits to mitigate climate change and reduce GHG

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(greenhouse gases), pursue pollution prevention, resource conservation and waste reduction in its operations, through:

- Seeking cleaner energy where practicable, and managing emissions effectively
 - Reducing waste generation, increasing recycling rates, and working with suppliers to minimize waste and harmful environmental impacts upstream and downstream,
 - Promoting resource efficiency (energy, water, etc.) in our solutions and services, as well as within our supply chains,
 - Designing solutions and services to optimize their environmental performance,
 - Reducing the environmental impact associated with products and packaging
- **Management Commitment** - Senior Management at Sophos will promote a culture in the organization that supports the environmental sustainability programme and will provide the necessary resources and support appropriate initiatives and programs to ensure the implementation of this Policy in line with business objectives and compliance obligations.
 - **Stakeholder Engagement** – The Environmental Sustainability Policy will be made publicly available and communicated to identified stakeholders. The Policy will regularly be updated based on stakeholders involvement and requirements.
 - **Internal and external issues** – Sophos considers issues as factors or conditions which define the context in which it operates its business. Sophos will determine the key relevant internal and external issues, which could have an impact on the environmental sustainability performance, including:
 - Environmental conditions,
 - External cultural, social, political, legal, regulatory, financial, technological, economic, natural, and competitive circumstances,
 - Internal characteristics or conditions of Sophos.
 - **Continual improvement** - Sophos is committed to the continual improvement of its environmental sustainability performance.
 - **Training** – The Company will provide regular appropriate training and awareness, supervision, and support on the environmental sustainability programme.
 - **Supplier Assessments** – Sophos will conduct third party audits and organize self-assessments on our key suppliers with respect to their environmental sustainability performance in support of Sophos' Policies and Procedures. Sophos will consider the results of these when procuring goods and services.

6.0 EXCEPTIONS

No exceptions.

7.0 DEFINITIONS

GHG Emissions - The emission into the earth's atmosphere of any of various (greenhouse) gases, particularly carbon dioxide, which contribute to the greenhouse effect (the trapping of heat from the sun which causes a gradual rise in the temperature of the Earth's atmosphere).

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Pollution - Pollution is the introduction of harmful materials into the environment. These harmful materials are called pollutants. Pollutants can be natural, such as volcanic ash, or created by human activity, such as rubbish and pesticides.

9.0 RELATED DOCUMENTS AND FORMS

- Annual Report (Corporate Responsibility section)
- Sustainability Plan
- Sophos Declaration to RBA Code of Conduct 7.0 (Feb 2021)

10.0 DOCUMENT HISTORY

VERSION	ISSUE DATE	CHANGES
1.0	01/04/2021	New policy

11.0 POLICY APPROVAL

This statement has been reviewed and approved in accordance with [Sophos's Policy](#).

The following persons are responsible for this policy:

Job Title	Role
EVP HR	Primary board and SMT level responsibility for this policy
Director Global Facilities	Direct oversight of the management, control and auditing of this policy
Facilities Manager and Office Services Group	Day-to-day implementation and monitoring of this policy
Vice President, Compliance	Legal review, including data protection regulations requirements.

This policy has been approved for release by:

Signature:  <small>Nigel Coxhead (Apr 9, 2021 14:27 GMT+1)</small>	Name: Nigel Coxhead Title: Global Facilities Director Date: 01/04/2021
Signature:  <small>Amanda Mallow (Apr 14, 2021 18:07 PDT)</small>	Name: Amanda Mallow Title: Executive Vice President Human Resources Date: 01/04/2021