



Qont Global CSR & ESG Policy

Effective Date: 23 August 2025

Entity: Qont (owned by Vigilshore Group Holdings) (“Qont,” “we,” “us,” “our”).

Scope: This Policy applies worldwide across Qont operations, subsidiaries, controlled affiliates, suppliers, contractors, and partners engaged in producing, sourcing, or delivering Qont products and services, including physical goods (e.g., hardware, components, apparel/merchandise).

0) Policy Status, Interpretation, and Liability Safe-Harbor

0.1 **Purpose.** This Policy sets out Qont’s corporate commitments and standards for Environmental, Social, and Governance (“**ESG**”) responsibilities.

0.2 **Aspirational Commitments.** Targets and commitments in this Policy are **goals**, not warranties, guarantees, or representations of future performance.

0.3 **Operational Primacy.** Qont prioritizes **consumer-first product quality, reliability, and safety**. Responsible sourcing and stewardship are pursued **where feasible and commercially reasonable** and will not prevent us from meeting essential quality, safety, reliability, or delivery requirements.

0.4 **No Liability for Target Shortfalls.** To the **maximum extent permitted by law**, Qont **disclaims liability** for any failure to achieve, by any date, any aspirational objective, initiative, or metric referenced in this Policy.

0.5 **No Contract / No Third-Party Rights.** This Policy is **not a contract** and **does not create third-party beneficiary rights**. It may be updated at Qont’s discretion.

0.6 **Local Law Prevails Where Mandatory.** Mandatory local law governs in case of conflict. Regional Variations (AU, EU, US, UK) below explain how we align with local frameworks.



1) Our Commitments at a Glance

- **Environmental:** Responsible physical sourcing (e.g., chips, components, textiles) **without compromising quality**; efficient operations; reduction of waste; practical stewardship in logistics and packaging.
- **Social:** High-performance professionalism, safe and fair workplaces, merit-based opportunity, community engagement, **career creation**, and discreet charitable activity.
- **Governance:** Transparent leadership; user-first data and privacy posture; strong internal controls; **anti-bribery** and **anti-corruption** compliance; ethical conduct across the value chain.
- **Enforcement:** A **tiered supplier enforcement program** (warning → remediation plan → audit/monitoring → termination).
- **Reporting:** **Annual, concise CSR/ESG reports** highlighting progress, actions, and areas for improvement.

2) Definitions

2.1 **Physical Goods** means hardware, components, peripherals, apparel/merchandise, packaging, and printed materials produced for Qont.

2.2 **Supplier** means any third party that provides goods or services incorporated into Qont offerings.

2.3 **Responsible Sourcing** means sourcing that respects applicable laws and Qont standards on safety, labor, and environmental practices, **balanced against** operational viability, quality, reliability, and delivery requirements.

2.4 **High-Performance Professionalism** means a culture of excellence, compliance discipline, and leadership standards consistent with a global enterprise.

3) Environmental Responsibility (E)

Position: We pursue responsible sourcing and environmental stewardship **in practical balance** with our non-negotiable commitments to product quality, safety, reliability, and delivery.



3.1 Responsible Sourcing of Physical Goods.

- We seek suppliers who comply with applicable environmental, product safety, chemical, and waste regulations.
- For **chips, components, and textiles**, we expect traceability appropriate to risk, adherence to hazardous substances restrictions, and product-safety certifications where required.
- We strengthen packaging and logistics practices to reduce unnecessary materials and transportation inefficiencies where commercially reasonable.

3.2 Manufacturing Standards.

- Facilities producing Qont goods should operate with legally required permits, emissions controls, and safe waste handling.
- Cooling, power, and process chemical management must align with applicable regulations and industry norms.

3.3 Materials and Substances.

- We prohibit the use of banned substances in Physical Goods and require conformance with relevant restricted substances lists where applicable.
- Where conflict-mineral or high-risk materials diligence is required by law, we expect suppliers to implement reasonable due diligence programs.

3.4 Product Lifecycle & Waste.

- Where feasible, we encourage design choices that support durability and responsible end-of-life handling (e.g., recyclability, repairability subject to safety).
- We will explore feasible take-back or recycling pathways where they add real value, subject to operational constraints.

No Net-Zero Claim. Qont does **not** adopt or market a “net zero” target. Our environmental approach is **responsibility-first, quality-first, and practically implementable.**

4) Social Responsibility (S)

Position: Qont builds a high-performance, compliant workforce and engages communities with professionalism and respect.

4.1 People & Workplace.



- Safe, healthy, respectful workplaces; compliance with wage, hour, and working-conditions laws.
- No forced, child, or trafficked labor; no unlawful discrimination or harassment.
- Merit-based opportunity, performance development, and leadership training consistent with high-performance professionalism.

4.2 Suppliers & Labor Standards.

- Suppliers must provide safe working conditions, comply with labor laws, and prohibit prohibited forms of labor.
- We may require evidence of labor compliance as part of our tiered enforcement (see §7).

4.3 Community & Opportunity.

- **Career Creation:** We invest in skills, training, and professional pathways that expand opportunity in the regions where we operate.
- **Community Engagement:** We participate in responsible local engagement and **quiet, private charitable activity** without commercializing philanthropy.

5) Governance (G)

Position: We prioritize **transparency, user-first ethics, data protection,** and **anti-corruption** compliance.

5.1 Leadership Accountability & Transparency.

- Clear executive ownership for CSR/ESG; periodic reporting to senior leadership and the board (or a delegated committee).
- Internal policies mapped to risk, audited on a cadence appropriate to the risk profile.

5.2 User-First Data & Privacy.

- Data is handled under strict privacy, security, and access controls.
- We implement technical and administrative safeguards designed to prevent unauthorized access, misuse, or disclosure.

5.3 Anti-Bribery & Anti-Corruption.



- **Zero tolerance** for bribery and corruption.
- Compliance with applicable anti-corruption laws and trade controls/sanctions.
- Training for relevant personnel and consequences for violations.

5.4 Ethics & Speak-Up.

- Code of Conduct expectations for employees and suppliers.
- Confidential reporting channels and non-retaliation for good-faith reports.

6) Product & Market Conduct

6.1 **Quality First.** Our supply, manufacturing, and logistics decisions **must not compromise** product safety, reliability, or consumer quality.

6.2 **Truthful Statements.** Public claims about environmental or social performance must be supportable, specific, and not misleading.

6.3 **Marketing and Procurement.** Vendor selection and marketing practices must align with this Policy and applicable law.

7) Supplier & Partner Enforcement Framework (Tiered)

We apply a documented, fair, and escalating process:

Stage 1 — Notice & Review. Formal notice of concern; meeting with supplier leadership to discuss issues and corrective expectations.

Stage 2 — Remediation Plan. Written corrective plan with clear actions, owners, and deadlines; periodic status checks.



Stage 3 — Audit & Monitoring. Verification through audit or third-party review; intensified monitoring. Costs may be allocated to supplier where permitted.

Stage 4 — Termination. If remediation fails or risk is severe, we **terminate** the relationship and may report the conduct where required by law.

We reserve discretion to **accelerate** stages for severe non-compliance (e.g., safety risks, illegal labor practices, corruption).

8) Reporting, Transparency & Continuous Improvement

8.1 **Annual CSR/ESG Report (Concise).** We publish a **short annual report** summarizing material actions, progress, and next steps.

8.2 **Independent Review.** We may engage independent reviewers where appropriate or required.

8.3 **Stakeholder Engagement.** We maintain channels for regulators, customers, and trusted partners to raise responsible sourcing or compliance concerns.

9) Implementation & Oversight

9.1 **Responsibility.** Day-to-day ownership resides with Qont’s executive sponsors for Operations, Supply Chain, People, Security/Privacy, and Legal/Compliance.

9.2 **Training.** Role-appropriate training is provided to personnel who influence sourcing, manufacturing, logistics, privacy/security, and supplier oversight.

9.3 **Records.** We maintain records reasonably necessary to evidence actions under this Policy, subject to privacy and confidentiality obligations.

10) Changes to this Policy

We may update this Policy to reflect operational, legal, or market developments. The effective date above indicates when updates take effect.



Regional Variations (AU, EU, US, UK)

The following apply **in addition to** the Global Policy and prevail where required by local law.

A) Australia (AU)

- We align with Australian requirements on workplace safety, environmental compliance, consumer protection, and **modern slavery** obligations applicable to qualifying entities and supply chains.
- Claims and disclosures will be consistent with ACCC guidance on truthful environmental representations.
- Where local law mandates specific remediation, reporting, or contractual terms, those requirements will control.

B) European Union (EU)

- We align with applicable EU directives and national implementations on sustainability reporting, product safety, labor standards, and environmental compliance; privacy practices align with EU data protection law.
- Environmental or social claims will follow EU rules on substantiation and unfair commercial practices.
- Where certain disclosures or due-diligence processes are mandated for covered entities, we will implement controls appropriate to scope and risk.

C) United States (US)

- We align with applicable federal and state requirements on product safety, truthful marketing, privacy/security, labor, and environmental compliance.
- Anti-bribery/anti-corruption compliance and internal controls are maintained consistent with applicable U.S. laws and industry norms.
- Where regulators prescribe ESG disclosures for covered entities, we will provide concise reporting appropriate to our footprint.

D) United Kingdom (UK)

- We align with UK requirements on modern slavery statements for qualifying organizations, product safety, and fair trading standards.
- Governance expectations follow applicable UK corporate governance and reporting norms as relevant to our structure and listings (if any).



- Environmental/social claims will be clear, specific, and supportable under UK consumer-protection rules.

E) Conflict Rule

Where a Regional Variation conflicts with the Global Policy due to mandatory local law, the **Regional Variation prevails** to the extent required. Otherwise, the **Global Policy applies**.