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APPROVED

by the Board of Directors of the Company on 26 January 2021

Chairman of the Board of Directors

GLOBALTRANS INVESTMENT PLC Environmental, Social and Governance Policy

Globaltrans Investment Plc (the "Company") recognises that environmental, social and governance ("ESG") issues have a material effect on the performance of the Company and its subsidiaries (the "Group"), as well as on the communities in which the Group operates. Our aim is to ensure that such issues are considered at all levels of the Company's business activities and that the Company's approach to such issues is in accordance with international and national codes and principles applicable to the Group's business.

Generally, the Company aims to achieve this by:

- Ensuring that our business vision and mission values are aligned to our ESG objectives, and that such objectives are relevant, understood, and well communicated to our employees, who are encouraged to demonstrate alignment to them.
- Adopting high standards of governance and ethics in our business conduct.
- Identifying all material ESG risks in the business activities undertaken by the Group and ensuring that these risks are fully considered and managed in a responsible and ethical way.
- Developing, implementing and maintaining a process-oriented and integrated ESG management system, to be periodically re-examined through audits to ensure improvement and best practices.
- Enhancing transparency through periodic disclosure of our ESG performance to our employees and shareholders.
- Providing appropriate information, instruction and training to employees and others working for the Company.
- Encouraging our customers, suppliers and business partners to adopt similar principles or policies.
- Aspiring to achieve benchmark levels in environmental, social and governance performance.

Environment

- Recognising that while rail is one of the greenest modes of transport, our business can still seek to minimise our environmental impact and protect the environment and biodiversity in the communities in which our business operates.
- Committing to the protection of the environment through seeking to reduce the environmental footprint of our business and develop a sustainable supply chain.
- Encouraging all staff to consider the environmental consequences of their actions and to seek to minimise their environmental impact where reasonably practicable.

Social

- Embracing a culture of diversity, where we set high ethical standards, demonstrate respect for human rights, promote gender equality and address issues such as discrimination and unethical labour practices.
- Supporting a culture in which all relevant stakeholders (including employees, suppliers, contractors and visitors) are valued and respected.
- Promoting the Group's commitment to the wider society through social enterprise partnerships and community development.

Governance

- Ensuring compliance with regulations governing the protection of human rights, operational and occupational health and safety, and ESG practices in the jurisdictions in which we operate.
- Identifying the relevant legislative and regulatory requirements and ensuring that rolling stock is compliant with these requirements.
- Enabling our management to act responsibly and in an exemplary manner.

Direction and oversight of the Group's Environmental, Social and Governance Policy is the responsibility of the Company's Board. The Board has delegated day-to-day management responsibility of this policy to the Chief Executive Officer of the Group, who shall report back to the Environmental, Social and Governance Committee (the "ESG Committee") of the Board on a regular basis.

ESG reports are prepared in accordance with the sustainability reporting guidelines of the Global Reporting Initiative ("GRI") and in line with the non-financial and diversity disclosure information contained in the EU's 2014/95/ EU Directive. The Company's Sustainability report can be provided for approval as a part of Company's annual report or as a separate document.

The ESG Committee is responsible for pre-final approval of the Sustainability report and provision of this report to the Board. The Board is responsible for final approval of the Sustainability report. Detailed information on the ESG Committee can be found in its Terms of Reference.