



**Indemo SIA
Sustainability
POLICY**

Versija: 1.0

Effective from: 30.10.2023

Date/number of Board decision: 30.10.2023 / Nr. 02-02/2023/6

RIGA
2023

SATURA RĀDĪTĀJS

1. Definīcijas un skaidrojumi	3
2. Politikas mērķis un vispārīgie noteikumi	3
3. Politikas galvenie principi	4
4. Politikas izpilde, kontrole un izmaiņas	5

1. Definitions and explanations

Working day	Any day on which banks are open in Latvia, except Saturdays, Sundays and public holidays.
ESG or ESG factors	Environmental, social and governance criteria used to assess a company's sustainability and social impact
Investor or Client	A person registered and accepted as an Investor on the Platform.
Latvijas Banka or LB	Bank of Latvia - the competent authority supervising investment services in the Republic of Latvia (https://www.bank.lv).
Platforma	Websites created and maintained by the Company, grouped under the domain name www.indemo.eu .
Policy	This <i>Sustainability Policy</i> .
Company	Indemo SIA, a limited liability company registered and operating under the laws of the Republic of Latvia, single registration No 40203401432, registered office at Mazā Nometņu iela 10-2, Riga, LV-1002, Latvia; an investment brokerage company licensed by the Bank of Latvia, which provides investment services and ancillary services to Investors through the Platform.
Board	The Company's Board

2. Purpose and general provisions of the Policy

- 2.1. The purpose of this Policy is to establish guidelines that define the Company's commitment to integrate environmental, social and governance aspects into its core business, decision-making processes and corporate culture. The Company aims to create sustainable value for the Company's stakeholders, including Investors, employees and the wider community.
- 2.2. The Company is committed to integrating ESG factors into its operations and investment processes. This commitment applies to all aspects of the Company's operations, including portfolio management, risk assessment, investor relations and internal practices.
- 2.3. The implementation, monitoring and improvement of this Policy are the responsibility of the Board.
- 2.4. All employees, regardless of their position in the organisation, are responsible for adhering to the principles and practices set out in this Policy. Employees are encouraged to actively support and promote ESG initiatives in their respective roles.

3. Main principles of the Policy

- 3.1. The main principles of the Policy are based on strategic objectives, ensuring consistency with the rapidly changing business environment.
- 3.2. Ethical business practices. The Company prioritises ethical and lawful business conduct, adhering to the highest standards in all aspects of business, ensuring that operations and investment decisions are consistently made on the basis of a rigorous and principled ethical framework. The Company pursues a zero tolerance policy against any form of market manipulation, insider dealing or misuse of material non-public information, understanding the critical importance of integrity and transparency in promoting trust and credibility in the financial markets. The Company ensures full compliance with relevant regulatory guidelines by demonstrating its commitment to the highest standards of corporate responsibility and ethical conduct in all aspects of the Company's business.
- 3.3. Corporate governance. The corporate governance model is designed to maintain and promote transparency, integrity and responsible decision-making throughout the organisation, ensuring that ethical principles underpin all activities. The Company adheres to the highest standards of ethics, corporate governance and regulatory compliance. The Company continuously works to promote and maintain good governance practices.
- 3.4. Investment and advisory decisions. The Company shall ensure that Investors are provided with comprehensive and transparent information that enables them to make informed choices that are consistent with their values and investment objectives. Through this approach, the Company will demonstrate its commitment to responsible investment and advisory practices, contributing to a more sustainable and equitable financial environment.
- 3.5. Environmental awareness. The public will actively monitor and seek to reduce the impact of carbon dioxide emissions on the environment. The Company will prioritise green office initiatives to promote a more sustainable working environment. These initiatives include going paperless, waste segregation, installing energy efficient lighting systems and adopting sustainable procurement practices.
- 3.6. Social responsibility. The Company maintains and promotes a diverse and inclusive working environment, ensuring that every employee feels valued, respected and free from any form of discrimination. In recognition of its responsibility to society, the Company will participate and contribute through regular engagement in charitable activities and philanthropic initiatives.
- 3.7. Training and development. Regular ESG training will be provided to the Company's employees to ensure that they understand and can effectively implement this Policy in their respective roles.
- 3.8. Continuous improvement. The Company will continuously monitor, evaluate and improve the Company's ESG performance, ensuring that the Company's business in the financial services industry remains sustainable and responsible.

4. Policy implementation, control and changes

- 4.1. The Policy and any amendments thereto shall be approved by the Board.
- 4.2. The implementation of the Policy is monitored by the Company's Board.
- 4.3. The Policy shall be reviewed at least once a year, as well as in cases when amendments are made to regulatory enactments (including regulatory enactments of the Latvijas Banka), or if there are changes in the Company's activities that affect this Policy. The Board is responsible for reviewing this Policy.