



# Environmental Management Policy



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# Commitment

Nitro Software PTY Ltd. and its affiliates and subsidiaries (“Nitro” or the “Company”) has established this Environmental Management Policy (the “Policy”) to formalize its commitment to appropriate environmental management objectives in its global business operations and supply chain.

## Approach

Nitro understands that developments in environmental systems and how the Company engages therein can represent both risks and opportunities. Management of such risks and opportunities (“Environmental Management”) is a responsibility shared across Nitro’s operations.

## Risks

Nitro is committed to identifying, mitigating, and adapting to risks developing from changes in environmental systems, including to social and regulatory responses to such changes. Risks may include, but not be limited to:

- Access to critical resources;
- Variability in resource availability;
- Variability in resource costs;
- Acute impacts to infrastructure owned or operated by the Company, or upon which the Company is dependent;
- Increased compliance costs with emergent regulatory mandates;
- Changes in unsafe working conditions; and
- Impairment of goodwill.

## Opportunities

Nitro’s strategic objectives for Environmental Management include:

- Compliance with applicable legal and regulatory requirements, including those promulgated by, but not limited to, the US Environmental Protection Agency and Occupational Health and



Safety Administration, Environment Protection Australia, and similar agencies across jurisdictions where we maintain operations.

- Alignment to widely recognized environmental sustainability standards, such as Sustainability Accounting Standards Board (“SASB”) for Software and IT Services, and stakeholder ESG-related interests.
- Monitoring of the supply chain for adoption of appropriate Environmental Management policies and processes.

## Key Focus Areas

This Policy addresses Environmental Management practices in a comprehensive perspective, with the following key focus areas identified as material to the Company’s operations. Nitro remains focused on these areas, but not exclusively:

- 1. Climate Action:** Nitro is committed to understanding and managing its impacts toward climate change as well as enhancing the Company’s resiliency towards climate change-induced risks. Nitro’s approach to climate action is guided by the following principles:
  - a. The Company recognizes the Intergovernmental Panel on Climate Change (IPCC) as a meaningful source of climate change resource and scenario modelling;
  - b. The Company favors actual emissions reductions over emissions offsets or credits;
  - c. The Company is committed to transparently reporting its greenhouse gas (GHG) emissions aligned with widely recognized reporting frameworks and applicable regulatory mandates;
  - d. The Company is committed to collaborative engagement with suppliers, partners, and stakeholders to enhance community climate action.
- 2. Water Security:** Nitro understands that data centers, whether owned or engaged by the Company, may divert substantial volumes of water for cooling purposes. The Company is committed to understanding the water stress indicators of the regions wherein it operates or benefits from data centers.
- 3. Biodiversity:** Nitro understands that all companies have nature-based dependencies, impacts, risks, and opportunities and is committed to developing an understanding of these as they relate to company operations and supply chain dynamics.
- 4. Responsible Resource Use:** Nitro is committed to the efficient use of resources and the responsible development and processing of resources across its operations. The Company encourages suppliers to adopt an equivalent Policy and Nitro reserves the right to monitor the supply chain for such.



# Reporting

In the event of a potential or actual Environmental Management issue or to report a concern, please contact the Compliance Team at [Privacy@gonitro.com](mailto:Privacy@gonitro.com). The Compliance Team will assist with reported issues that require contact with governing authorities.

# Administration

This Policy is administered and periodically reviewed by Nitro’s Compliance Team. Nitro reserves the right to change this Policy at any time without notice.

## Revision History

Revision Number	Implementation Date	Author(s)	Approval	Brief Description
V1.0	September 1, 2024	Amber Aerts	David Lenoe	V1 – Initial Version

Nitro Software is a global SaaS leader in PDF software, document management and electronic signatures. Nitro’s comprehensive document solution includes powerful PDF tools, highly secure eSigning with identity verification capabilities, and real-time analytics to measure ROI and quantify sustainability efforts—all supported by a best-in-class customer success and change management team. With more than 3 million licensed users and 13,000+ business customers across 157 countries, Nitro serves 67% of the Fortune 500. For more information, visit: [GoNitro.com](http://GoNitro.com).



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