



Environmental, Social and Governance (ESG) Policy

Dubber is one of the world's leading providers of cloud-based call recording and voice AI (Artificial Intelligence) operating through leading Service Provider networks & communications solutions globally.

This policy framework sets out Dubber's approach to managing our environmental, social and governance related policies and practices within our operations and supply chain. Responsibility for implementing this policy and the company's approach to ESG rests with the Chief Executive Officer.

As an Australian headquartered company, where practicable, Dubber will address the recommendations and guidance provided in the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations ([ASX Principles](#)). Further, we embrace and embed the principles of other ESG best practice including the [Ten Principles of the UN Global Compact](#) and act to positively contribute to the [UN Sustainable Development Goals](#).

Our approach to ESG is strategic and aligned to the views of our key stakeholder groups. During 2022 we conducted our first double materiality assessment and the findings from this have been used to shape our ESG targets. These targets and our action plan for delivery form our Sustainability Strategy. We are externally publishing this document in 2023 and are committed to on-going and transparent progress reporting.

Underpinning our Sustainability Strategy are the core ESG policies that we always abide by. These include:

- **Anti-bribery and Corruption:** Dubber strives to maintain high ethical standards and to promote full compliance with anti-bribery and anti-corruption laws and regulations that apply where the Group does business. We prohibit corruption in all its forms, including bribery, extortion, fraud, embezzlement, money laundering and facilitation payments. Gifts and hospitality are not accepted if they are in any way thought or perceived to be in return for either doing/not doing something or showing favour/disfavour to a person or organisation. See our Anti-Bribery and Corruption Policy
- **Board Governance and Charter:** Our Corporate Governance Policies set out our board and sub-committee charters, procedures for selecting and appointing directors, our code of conduct, securities trading policy, how we manage risk and our internal compliance and controls approach.
- **Business ethics and values:** We conduct all business with honesty and integrity and comply with all relevant legislation. Anti-competitive practices including market-sharing, price-fixing, non-respect of confidentiality agreements, industrial espionage and abuse of dominant position are prohibited. We also expect high standards of behaviour from firms and individuals that do business with us. See our Statement of Values.
- **Community:** We strive to positively contribute to our local communities, engaging and supporting local charities and encourage our employees to engage in community-based volunteering.
- **Communications:** We make available to all employees open communications channels for suggestions and complaints to management.



- **Equality, Diversity & Inclusion:** Fostering an inclusive workplace where every employee feels respected and valued is important to us. Direct discrimination, indirect discrimination, harassment, and victimisation in relation to age; colour; disability (mental or physical); ethnicity; gender reassignment; marriage or civil partnership status; nationality; political opinion; pregnancy and maternity; race; religion or belief; sex; sexual orientation; and worker representative organisations are all prohibited. See our [Diversity Policy](#).
- **Environment:** Whilst we have a relatively small environmental footprint, we still seek to minimise our impacts, particularly in relation to waste and energy where opportunities for efficiencies, recycling and renewable energy are explored. Furthermore, our product 'Notes by Dubber', supports and enables the use of virtual meetings by transcribing and documenting actions, thus reducing the need for third-party travel.
- **Ethical AI:** As a software provider using AI enabled technology, we strive to be transparent in our design and development practices to minimise the risk of biases and errors. Dubber follows a set of internal Responsible AI Principles.
- **Health, Safety & Wellbeing:** We are committed to effectively managing all aspects of health and safety in our workplace, and positively contributing to employee wellbeing. We provide our employees with a safe and healthy workplace in compliance with all applicable laws and regulations.
- **Human Rights:** We respect human rights and operate in alignment with the fundamental rights set out in the [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#) and the [UN Guiding Principles on Business and Human Rights](#). This includes upholding freedom of association and collective bargaining, not using forced or child labour and eliminating discrimination. Dubber has an Anti-Discrimination, Bullying and Harassment Policy.
- **Data privacy:** We are committed to protecting the privacy and confidentiality of personal information about our employees, customers, business partners and other identifiable individuals. All data stored within the Dubber platform is encrypted and stored in dedicated multi-tenant data structures to ensure both security and separation of user data. We recognise the importance of protecting personal information and are committed to processing it responsibly and in compliance with all applicable data protection laws and as detailed in our Data Protection Policy.
- **Information Security:** Our security practices are constantly updated and developed to ensure that data is protected at every stage of the communication capture process, and beyond to storage and analysis. The company Information Security Management System (ISMS) is externally verified to ISO27001:2013. For more information refer to [Security \(dubber.net\)](#)
- **Labour Standards:** We pay fair remuneration, including company performance linked bonuses where applicable. We provide all permanent employees the opportunity to participate in an Employee Stock Ownership Plan (ESOP) where applicable and all other statutory benefits at a minimum. Employees are not expected to work beyond the local statutory required hours including overtime, except in extraordinary business circumstances with their consent or where the nature of the position requires such work. Employees receive far more than the ILO (International Labour Organisation) recommended paid holiday and we do not operate zero hour contracts. Employees are always allowed at least one day off per seven-day week

- **Supply chain partners:** We are committed to having transparent payment relationships with our suppliers including being on time and prompt.
- **Tax:** We comply with the letter and spirit of all tax laws applicable to the company. We are committed to paying our taxes, not engaging in aggressive tax avoidance and being transparent in our relationship with the tax office.
- **Whistleblowing:** Dubber requires all employees to maintain high standards of conduct and we provide everyone working at the company with the means to raise concerns without fear of retaliation or reprisal. We encourage colleagues and other stakeholders to report suspected wrongdoing or breaches of this policy as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected. See our [Whistleblower Policy](#).

This ESG Policy applies to all employees and contractors at Dubber. We communicate this ESG Policy to all employees and make it publicly available on the company website. The policy is reviewed and updated annually.

This policy and all related policies and documents that are publicly available can be found on our website here: [Investor Centre \(dubber.net\)](#)

Signed:



Steve McGovern, CEO Dubber

18 May 2023