



ESG (Environment, Social, and Governance) Policy

1. Purpose

At Spiro, we recognize that responsible business practices and robust governance are critical to ensuring sustainable growth, operational resilience, and long-term value creation. As Africa's largest electric mobility provider, Spiro is committed to embedding Environmental, Social, and Governance (ESG) principles into every aspect of our business. This policy formalizes our commitment to sustainability and serves as a framework for integrating climate action, circular economy principles, responsible social practices, and transparent governance across our operations and value chain.

2. Policy Statement

Spiro is committed to achieving high ESG standards across all our investments and operations. By integrating sustainability in every phase of our business model, we aim to effectively manage ESG risks, drive innovation, and contribute to long-term positive environmental and social outcomes. Our key ESG objectives include:

Compliance & Governance

- Adhere to all applicable national regulations and international ESG standards, including IFC Performance Standards and UN Global Compact.
- Establish strong governance structures, ensuring compliance and accountability at all levels of the organization.
- Implement a zero-tolerance approach to bribery and corruption, supported by a strong whistleblowing mechanism to report violations.

Climate Action & Low-Carbon Transition

- Achieve net-zero emissions by 2040, integrating clean energy solutions and electric mobility infrastructure.
- Conduct GHG emissions assessments (Scope 1, 2) to monitor and actively reduce our carbon footprint.



- Expand carbon credit generation through the "Grouped Electric Bikes Project in Africa", reinforcing Spiro's role in decarbonizing transportation.
- Integrate low-carbon technologies across all projects and drive innovation in energy-efficient transport systems.

Circular Economy & Resource Management

- Ensure responsible sourcing and ethical resource management, prioritizing transparency and traceability in our supply chain.
- Implement a closed-loop battery recycling system, ensuring end-of-life battery recovery, repurposing, and responsible disposal.
- Align with circular economy principles, incorporating waste reduction, recycling, and upcycling initiatives across our operations.
- Enhance water management practices to optimize consumption and safe discharge of wastewater.

Environmental Stewardship & Pollution Prevention

- Prevent and minimize pollution across all operations, including emissions, effluents, and waste, through continuous improvement.
- Ensure responsible chemical handling, spill prevention, and emergency preparedness
- Monitor and control noise, air, and water quality impacts from operations to protect the environment and surrounding communities.

Biodiversity Conservation & Natural Resource Protection

- Integrate biodiversity considerations in project design and site selection, ensuring no significant adverse impacts on sensitive ecosystems.
- Promote habitat protection and restoration where Spiro operates
- Use natural resources such as water and energy efficiently, promoting conservation and reuse wherever feasible.

Social Equity & Inclusive Growth

- Foster a zero-harm culture in our workplaces and for customers by enhancing safety features in production and raising awareness on EV safety.



- Promote equitable employment practices, ensuring diversity, workforce representation, and fair treatment of employees.
- Expand Spiro Academy's programs, delivering technical training and leadership development to strengthen Africa's electric mobility workforce.
- Strengthen community engagement, ensuring local job creation and economic participation in Spiro's operational markets.
- Assess and manage community impacts related to operations, ensuring grievance mechanisms and proactive dialogue with affected stakeholders.

Transparency & Strategic Partnerships

- Implement robust ESG performance tracking
- Collaborate with governments, investors, and industry stakeholders to advance Africa's electric mobility and clean energy ecosystems

3. Scope

This policy applies to all Spiro operations including assembly and manufacturing workshops swap stations, service stations and showrooms ensuring that ESG principles are consistently integrated across business decisions and operations.

4. Engagement & Implementation

Spiro is committed to engaging with internal and external stakeholders to drive ESG initiatives.

The implementation of this policy includes:

- Governance Oversight: Assigning ESG leadership roles to oversee policy compliance, risk management, and continuous improvement.
- Performance Monitoring: Establishing ESG KPIs to track sustainability metrics and ensure alignment with business objectives.
- Stakeholder Collaboration: Engaging with employees, business partners regulators, and local communities to enhance ESG performance and accountability.
- Policy Review & Continuous Improvement: Conducting periodic ESG policy evaluations to reflect evolving sustainability priorities and regulatory changes.
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5. Conclusion

By embedding ESG principles into our business model, governance framework, and operational practices, Spiro ensures long-term environmental responsibility, social impact, and ethical business growth.

This policy will be disclosed publicly to enhance transparency and stakeholder trust. It reflects our commitment to driving sustainable mobility, stakeholder value creation, and operational resilience while contributing to Africa's transition toward clean and circular transportation solutions.