

## Sustainability Policy

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LightRiver, Inc. (the "Company") aspires to be the recognized leader in the delivery of outstanding products and services in an ever-changing technology industry. We partner with the most reputable manufacturers and suppliers to deliver nothing less than the best products available. We foster a work environment that attracts talented employees who improve our deliverables. And we never stop trying to improve the bottom line of our customers. In service to this mission, LightRiver is committed to operating its business in an environmentally and socially sustainable way, considering the interests of our various stakeholder groups and the impact of our business on the environment and communities in which we operate. We believe that by focusing on long-term sustainability we best serve the Company and our stakeholders. We think of sustainability broadly to include environmental, social, and governance matters that could impact our ability to maintain a profitable and responsible business over the long term.

### **Purpose**

This Sustainability Policy ("Policy") articulates our top-level strategy for integrating sustainability into our business, including a defined governance structure and management system approach.

### **Scope**

This Policy applies to all Company operations and facilities.

### **Governance Structure**

The Company has established the following governance structure for its sustainability program:

**Board of Directors:** The Company's Board of Directors provides strategic oversight and review of the Company's sustainability efforts.

**Chief Executive Officer:** The CEO is responsible for driving a culture of long-term sustainability throughout the Company's business.

**Sustainability Coordinator:** The Company has designated, Walt Paskowski, as coordinator of its sustainability program (the "[Sustainability Coordinator]"). The Sustainability Coordinator is accountable to the CEO and the Sustainability Committee for achieving the objectives of this Policy and program. The role of the Sustainability Coordinator is to coordinate the Company's sustainability activities including:

- Leading an annual materiality assessment or other structured review of sustainability topics to establish focus areas for the Company
- Regularly reviewing the Policy and program for necessary adjustments.
- Initiating actions to improve the program.

The Sustainability Coordinator will serve as chair of the Sustainability Committee.

**Sustainability Committee:** The Sustainability Committee is responsible for providing strategic guidance and support to the Sustainability Coordinator to ensure that the goals of this Policy are carried out. The following individuals constitute the Sustainability Committee:

Name	Title
Mike Jonas	Chief Executive Officer
Bryan Hasagawa	Chief Financial Officer
Bryan Hasagawa	Chief Operating Officer
Sara Evans	HR Manager - US
Walt Paskowski	VP Marketing & Sales Ops
Brian Richards	VP IT Department

**Business Unit/Function Managers:** All Company business unit and function leaders are required to ensure employees in their business units comply with this Policy and directives from the Sustainability Coordinator and Sustainability Committee and foster a culture in which sustainability is integrated into the business.

### **Materiality Assessment**

Each year, the Sustainability Coordinator will cause the Company to conduct a materiality assessment or a limited materiality review to determine or confirm those sustainability topics that are most relevant for the Company's business and its stakeholders, and that represent the Company's most significant impacts on the economy, environment, and people ("Material Topics"). In designing the materiality assessment or review, the Sustainability Coordinator will consult the guidance provided by the Global Reporting Initiative ("GRI") and other recognized standards setting bodies. The Company will complete a full materiality survey periodically. In developing the universe of topics to be considered, the Sustainability Coordinator will consider topics included in the GRI standards, the relevant SASB standards, and other recognized sustainability or "ESG" standards.

The Sustainability Coordinator will report the results of each materiality assessment or review to the Sustainability Committee, the Board of Directors, and others as the Sustainability Committee deems appropriate. In addition, the Sustainability Coordinator will maintain a register of the Material Topics.

### **Goals for Program Maturity and Performance**

For each Material Topic, the Sustainability Coordinator will work with the Sustainability Committee to establish (a) goals for a program relating to the topic, including level of maturity, (b) metrics that will be used to track the Company's performance, and (c) where possible, quantitative targets for performance. In developing metrics, the Sustainability Coordinator will consider metrics that are included in leading voluntary reporting standards, including the Global Reporting Initiative and the SASB Standards.

### **Management System Approach**

For each Material Topic, the Company will develop and maintain an appropriate management system to help effectively integrate the Company's objectives into its core business operations. Each such management system will include the following elements to the extent appropriate:

- Appropriate policies covering the topic
- Identification of risk, opportunities, and impacts relating to the topic in the context of the Company's specific business and modes of operation

- Clear assignment of responsibility and accountability for the management system
- Training and communication programs to increase competency and capacity
- A program to monitor and/or audit compliance with the Company's policies and measure performance and improvement
- A mechanism to track corrective actions and improvement projects
- Regular management reviews and/or reporting to the Sustainability Committee

As many of the Material Topics may be closely related, multiple topics may be covered by a single management system.

### **Reporting**

**Reporting to the Board of Directors:** The Sustainability Coordinator or a member of the Sustainability Committee will report to the Board of Directors [at least annually] on the state of the Company's sustainability program, including the identified Material Topics, the status and maturity of the Company's various management systems relating to sustainability, and the Company's performance on identified sustainability metrics.

**External Reporting:** The Company is committed to transparency with respect to its sustainability efforts, and as such will regularly provide its stakeholders / publish a sustainability report that includes relevant information regarding its sustainability program and performance.

### **Amendments and Waivers**

The Company reserves the right to interpret, administer, change, modify, or rescind this policy at any time, with or without notice, to the maximum extent permitted by law. No statement or representation by a supervisor or manager or any other employee, whether oral or written, can supplement or modify this policy. Changes will only be valid if approved in writing by the Company's Chief Executive Officer or other official to whom such authority has been delegated in writing. No delay or failure by the Company to enforce any work policy or rule will constitute a waiver of the Company's right to do so in the future.

### **Administration of this Policy**

The Sustainability Coordinator is responsible for the administration of this Policy. All employees are responsible for consulting and complying with the most current version of this Policy. If you have any questions regarding this Policy or concerning the scope or delegation of authority, please contact the HR Department.