



Environmental, Social & Governance Policy

Version: October 30, 2023

1. Purpose

The purpose of this Environmental, Social & Governance Policy (the “Policy”) is to define the approach Casa Systems, Inc. (together with its affiliated entities, the “Company” or “we”) takes to integrate the consideration of environmental, social and governance (“ESG”) risks into our daily operations. To help form the Policy, the Company engaged outside expertise to consider ESG-related issues.

The Company’s mission is to deliver ultra-broadband solutions that keep families, communities and the world connected. We harness our passion for innovation to drive technological solutions that allow service providers to improve the way we live.

The Company believes that the consideration of ESG issues enhances the overall value of our business, and by identifying and addressing a broader range of risks, can lead to better financial results, in addition to informing more responsible internal and external operations. Given the nature of our business, we are particularly focused on supply chain management as well as more general ESG matters.

2. Scope

This Policy applies to all operations conducted by the Company, following the date of the Policy’s adoption, and will be interpreted in accordance with local laws and regulations. This Policy also applies to the internal practices of the Company and to all of its current and active employees.

3. Environmental

The Company is committed to reducing its environmental impact across its supply chain and supporting sustainable operational practices.

Supply Chain Environmental Policies:

The Company encourages its suppliers to responsibly and sustainably source raw materials and other inputs, packaging materials, and other goods and services in a way that will help reduce the Company’s impact on air, land and water. Without limiting the preceding, we will require entities within our supply chain to:

- Comply with all applicable environmental laws and regulations including those related to waste disposal, hazardous waste, greenhouse gas emissions, wastewater and toxic substances.
- Characterize, monitor, control and treat, as required, prior to discharge all air emissions, wastewater and solid waste generated from operations.
- Work across supply chains to minimize deforestation and loss of biodiversity.
- Obtain, maintain and keep current all required environmental permits (e.g., discharge and effluent monitoring records) and follow any operational, registration and reporting requirements.

The Company encourages its suppliers to consider actively measuring, managing and disclosing environmental impacts in areas such as greenhouse gas ("GHG") emissions, water and waste. The Company also emphasizes that its suppliers should set targets and implement action plans for reducing environmental impacts.

4. Social

Employee Benefits:

The Company believes a well-supported and encouraged workforce is crucial to the health and well-being of an organization. The Company provides:

- Workers Compensation Insurance
- Social Security
- Unemployment Compensation
- Vacation and Paid Time Off
- Sick Leave
- Family and Medical Leave Act ("FMLA")
- Maternity Leave

Equal Employment Opportunity:

The Company is committed to a policy of non-discrimination and equal opportunity for all employees and qualified applicants without regard to race, color, religion, sex, pregnancy or pregnancy-related conditions, sexual orientation, gender identity, national origin, ancestry, age, physical or mental disability, genetic information, veteran status, military service, application for military service, or any other status protected by applicable law. The Company will make reasonable accommodations for qualified individuals with known disabilities or pregnancy-related conditions, in accordance with applicable law.

Anti-Harassment/Anti-Discrimination Policy:

The Company is committed to providing a work environment that is free of harassment based on sex or any other personal characteristic protected under federal or state law.¹ The Company is also committed to prohibiting other forms of unlawful harassment² and discrimination. Examples of such harassment include, but are not limited to, using epithets or slurs or making jokes or pranks that focus on a protected characteristic and/or circulating or displaying written or graphic material that denigrates or shows hostility or aversion toward a person or group because of a protected characteristic.

Supply Chain Policies:

Corporate integrity, responsible product sourcing, and the safety and wellbeing of workers across the global supply chain are of paramount importance to us. The Company's supply chain goals are inspired by the following:

- The International Bill of Human Rights
- The Fundamental Conventions of the International Labour Organisation
- The OECD Guidelines for Multinational Enterprises
- The United Nations ("UN") Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights
- The Ten Principles of the UN Global Compact

The Company strictly prohibits discrimination³, harassment⁴, sexual or otherwise, and retaliation, both internally and within our supply chain. The Company is committed to preventing excessive work hours, upholding freedom of association and applicable laws and collective bargaining agreements.

¹ "Sexual harassment," as defined under the Company's Employee Handbook means: "[S]exual advances, requests for sexual favors, and/or verbal or physical conduct of a sexual nature when: (1) submission to or rejection of such conduct is made, either explicitly or implicitly, a term or condition of employment or the basis for an employment decision; or (2) such conduct has the purpose or effect of unreasonably interfering with work performance or creating an intimidating, hostile, humiliating or sexually offensive work environment."

² "Other harassment" is defined as "[V]erbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of the individual's race, color, religion, pregnancy or pregnancy-related condition, sexual orientation, gender identity, national origin, ancestry, age, physical or mental disability, genetic information, veteran status, military service, application for military service, or any other characteristic protected by law, and that has the purpose or effect of creating an intimidating, hostile or offensive work environment, or has the purpose or effect of unreasonably interfering with an individual's work performance."

³ Our Supplier Code of Conduct defines discrimination as workplace discrimination "based on the grounds of an individual's race; color; gender; age; national origin; religion; citizenship status; political opinion; marital status; sexual orientation; gender identity or expression; transgender status; physical or mental disability; protected veteran status; engaging in, or refraining from engaging in, protected union activity; genetic information; actual or planned pregnancy (including childbirth and related medical conditions, including those related to lactation); or other categories protected by applicable law."

⁴ Our Supplier Code of Conduct defines discrimination as: "[B]ehavior that has the purpose or effect of creating an intimidating, hostile or offensive work environment, or has the purpose or effect of unreasonably interfering with an individual's work performance."

Health and Safety:

The Company will require suppliers to provide workers with a safe, healthy and sanitary working environment. Suppliers will be required to implement procedures and safeguards to prevent both general and industry-specific workplace hazards and work-related accidents and injuries. Our suppliers will be required to:

- Provide workers adequate and appropriate personal protective equipment to protect against hazards typically encountered within their scope of work.
- Support workers' rights to refuse and report unsafe or unhealthy working conditions, regardless of role, title or responsibility, and without fear of disciplinary action, dismissal, discrimination or retaliation.
- Provide workers training on appropriate occupational health and safety policies and procedures, including emergency evacuation procedures, prior to employment and then on a regular basis in workers' primary language(s).
- Not impose unreasonable limitations on workers' access to toilets, rest breaks or lactation breaks.

Supplier Facilities:

The Company encourages all suppliers to ensure that their facilities meet all applicable building codes and industry design and construction standards; post safety rules, inspection results, incident reports and permits, in each case, as required by law; and obtain and maintain all construction approvals required by law.

Furthermore, the Company will require that suppliers' facilities have:

- Adequate evacuation plans.
- Adequate, well-lit (including emergency lighting), clearly marked, and unobstructed emergency exit routes, including exits doors, aisles, and stairwells;
- A sufficient number of emergency exit doors that are unlocked (from the inside) and that are readily opened from the occupied side and swing in the direction of emergency travel;
- Visible and accurate evacuation maps posted in the local language;
- Adequate ventilation and air circulation;
- Adequate lighting;
- Adequate first aid kits and stations;
- Adequate fire safety, prevention, alarm and suppression systems;
- Adequate access to potable water; and
- Adequate access to private toilet facilities.

If a supplier provides dining facilities for its workers, the supplier must provide safe, healthy and sanitary facilities (including food preparation and storage areas) that comply with all health and safety standards.

Conflict Minerals and Responsible Sourcing:

The Company is committed to complying with laws and regulations requiring disclosure of the use of conflict minerals. Entities within our supply chain will be required to exercise due diligence to reasonably assure that the minerals used in their operations do not originate from regions associated with armed conflict and do not directly or indirectly finance or benefit groups that are perpetrators of serious human rights abuses.

5. Governance

The Company emphasizes good governance and has established a strong risk management framework and board oversight. The Company's integrity and reputation are among our greatest assets. To effectuate good governance, our Board of Directors (the "Board") has adopted corporate governance guidelines to assist the Board in the exercise of its duties and responsibilities and to serve the best interests of the Company and its stockholders. Internally, the Company commits to reviewing practices, conduct and principles to align with the ESG goals as reported herein and make reasonable efforts to correct misalignment if discovered.

The Company believes that Board committees have a vital role in corporate governance and will have and maintain at all times an Audit Committee, a Compensation Committee, and a Nominating and Corporate Governance Committee. Each such committee shall have a charter that has been approved by the Board. The Board may, from time to time, establish or maintain additional committees as necessary or appropriate.

Governance of National and International Business Ethics:

The Company is committed to conducting business ethically and lawfully in countries where we operate across our supply chain. The Company's suppliers are encouraged to demonstrate a strong commitment to ethical behavior. We expect our suppliers to conduct their business in accordance with the highest ethical standards. We will require our suppliers to have controls in place to prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, embezzlement, and even the appearance of conflicts of interest. Our suppliers' business dealings should be fair, legal and honest, and their books and records should accurately reflect their business dealings. Our suppliers will be required to acknowledge their obligations under all applicable anti-corruption laws and regulations, including the Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act and applicable international anti-corruption conventions. If our suppliers extend any business courtesies to our employees, they must do so infrequently, and the courtesies must be of no more than moderate value.

Code of Business Conduct:

The Company is committed to the highest standards of professional and ethical business conduct in its dealings with employees, customers, suppliers and our representatives. Our reputation for honesty, integrity and ethical business practices is as important as our reputation for providing outstanding products, services and support to our customers. The Company has implemented a Code of Business Conduct applied to all employees that broadly sets forth the principles and standards of the Company and our values, including, but not limited to:

- Passion
- Dedication
- Perseverance
- Honesty
- Loyalty
- Innovation
- Risk taking
- Fostering a Happy Place to Work

The Company is committed to conducting its business in compliance with both the letter and the spirit of applicable laws, rules and regulations. No employee or representative shall engage in any unlawful activity when conducting business on behalf of the Company or in performing his or her day-to-day company duties, nor shall any employee or representative instruct others to do so.

Cybersecurity & Privacy:

The Company is committed to the protection of personal data for ourselves and our employees, business partners and customers. The Company requires ourselves and will require our suppliers to protect all information and data received from us, our business partners and customers, in accordance with industry recognized best practices, applicable law and regulations, and contractual obligations. If any supplier becomes aware of a security or data privacy breach or suspected breach involving our data, or data of our employees, business partners or customers, the supplier will be required to notify us immediately.

Document History

- *Adopted: October 30, 2023*