



SUSTAINABILITY REPORT | 2022



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Introduction



Mission

We are committed in establishing a sustainable business front that pushes the limits of technology while taking care of society and protecting the environment.



Vision

We invest in partnerships that are essential to driving society's advance and sustainable development. We believe that human beings can build the future through memory, and we can broaden our vision and conquer new horizons with dedication and effort. We work for innovation and continuous implementation of new technologies to become reference in quality and preservation of the environment.



Values

Our main corporate values are: **INTEGRITY, JUSTICE, HONESTY, PERSEVERANCE, ENGAGEMENT, HARMONY, LOVE, INNOVATION.** We believe that these eight characteristics are the key to our continued success and strong competitiveness in the market.



Introduction

Logo and Brand

We act with agility and speed to enrich all of life's precious moments



Agility

Responsive to markets and customers



Speed

Leading in Innovation and Productivity



Innovation

Exploring all possibilities




Vivacity

Diverse and elegant product design

1 About the Report

- Self-Transformation of ADATA Brazil

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1 About the Report

Self-Transformation of ADATA Brazil

We present our first Sustainability Report, prepared **(GRI 2-4)** based on the Global Reporting Initiative (GRI) Standards, for the period January 1, 2022, to December 31, 2022 **(GRI 2-3 a)**. It includes 100% of the operation of the units located in Santo Antônio da Posse-SP and Manaus-AM **(GRI 2-2 and 2-3)**.

We are a private company with two limited liability companies as shareholders, where the owners act in the management reporting to our headquarters in Taipei (Taiwan) **(GRI 2-1 a b)**. We are committed to the environmental, occupational safety, social, and economic issues of our activities. We hold NBR ISO 9001:2015, ISO 14001:2015, ISO 14064:2019, ISO 45001:2018 certifications.

The achievement of all these certifications is evidence of our commitment to excellence and concern for the improvement of our processes.

By producing this report we will demonstrate our commitment to transparency. Enabling stakeholders to evaluate ADATA's performance on issues related to sustainability, such as environment, corporate governance, diversity, inclusion, relations with employees and communities, among others.

We consider the publication of this report as more than simply presenting data and actions. It is an opportunity to be transparent with our stakeholders and improve our knowledge of the areas that need improvement, as well as a tool to engage and educate on sustainability issues.

We believe that integrating sustainability into all areas of ADATA is critical to long-term success and building a more just and sustainable society.

All the information presented was verified by an internal and multidisciplinary work group, with the approval of the Senior Governance, and subsequent verification by SGS in March 2023 **(GRI 2-5)**. Questions and comments can be forwarded by e-mail(ETI_BR@adata.com) or phone (+55 19 3199-0886) **(GRI 2-3)**.

We hope this report reflects our commitment to sustainability leadership and provide valuable information about our performance in the areas presented.

LEARN MORE:

- Materiality Information
- Management System
- Code of Ethics

ADATA Brazil (GRI 2-1 c)

HEADQUARTERS

ADATA INTEGRATION BRAZIL S.A
ADATA ELECTRONICS BRAZIL S.A

Rodovia SP 340, km 142,5,
Condomínio Metro Parque,
Santo Antônio de Posse - SP,
13830-000
Contact: (19) 3199-0886

BRANCH

ADATA ELECTRONICS BRAZIL S.A


Av. Torquato Tapajos, 10933,
Galpão 03 - Oasis, Tarumã-Açu,
Manaus/AM
69023-003
Contact: (92) 2125-9090



2 Message from the President of Adata Brazil

- Our Commitment

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Our commitment to sustainable development is in our DNA. ”

We emerged in an era of technological expansion when environmental concerns were already part of the essence of the activities of large companies. In the year we were founded, 2001 in Taiwan, smartphones had not yet been developed, but there was already a lot of talk about climate change, air pollution, deforestation, and habitat loss. We were born with the awareness that in order to conquer a prominent place as a company in such a technological world, the guidelines cannot be purely economic, not only for moral and ethical reasons but also as a business strategy.

Our first sustainability report shows how we got to this prominent place, being among the top three market leaders worldwide.

To achieve this, we focus on individuals, we have received awards everywhere in the world where we operate as the best place to work, we seek to work only with approved suppliers, and we make environmental and safety management our guiding principles. We are always seeking to reduce impacts, carrying out actions in all sectors of the company, according to our value chain. Today we designate and support companies that recycle electronic components, raw materials, and input for our activity. All safety management follows internationally recognized guidelines, such as prevention policies and employee welfare.

The search for this excellence is in the improvement of our tools, and the GRI Report is a foundation to keep us on track toward the balance between the economy, the environment, and human rights.

We did not waive our social responsibility, our focus for the coming years is to improve our water and energy management, continue with practices of approval of internal suppliers in each country and design management more integrated with sustainability, with committees, following our trajectory of innovation and leadership.

Sustainability is essential to ensure the company's longevity and to create value for all stakeholders: shareholders, customers, employees, suppliers, and communities. Therefore, our first report is a milestone for us, where we can demonstrate our actions and show that we are in a process of development and continuous improvement in all our practices.


For us, **sustainable development** has always been among our **top priorities**, and is one of the pillars of our success. ”



3 ADATA Worldwide

- Our History in the World
- Our Global Presence
- Awards
- Brands and Achievements
- ADATA in Brazil
- Production Process

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We are ADATA - Our history in the world

Founded in May 2001 by the president and CEO, Mr. Simon Chen, ADATA Technology Co., Ltd. has quickly grown to become one of the largest suppliers of memory products in the world. In the beginning, with DRAM modules as the main product line, our mission as ADATA Technology was to become "The leading global brand of memory products". Later, recognizing the market trend, we diversified the product portfolio to include Flash peripheral equipment and capitalize on the strong growth in the market for Flash-based products. With the ability to rapidly develop high-quality DRAM and Flash memory products that meet market demand, we have experienced remarkable growth.

We understand that professionalism and innovation drive a company's competitiveness, as well as the value of its products and services in the market. ADATA's rigorous execution requires performance at the highest standards regarding ID design, purchasing and management of the supply chain (raw materials), manufacturing processes, and quality control and testing. Through constant innovation and development of products that exceed our customers' expectations. We are the second largest DRAM memory producer in the world and a globally branded SSD module

manufacturer (DRAMeXchange) and owner of over 500 patents.

Our Headquarter (main office) is located in Taiwan; our factories in 2 countries, being Brazil and China, that together employ approximately 2,100 employees; 14 regional offices distributed in several countries such as Germany, Brazil, China, Netherlands, India, Japan, Korea, Mexico and USA **(GRI 2-1)**.

Our multifaceted business strategy and excellent revenue performance have placed us among the top 20 global brands in Taiwan (Global Brand Consultancy/ Interbrand, 2021).

Our commitment to quality in the work environment is recognized worldwide. In 2021 we were named one of the best places to work in Greater China™.

In 2022 we became certified with the GPTW seal, as the best companies to work for in the United States and Brazil.

For the third consecutive year, we were among the best companies to work for in Asia (2020, 2021, and 2022). These achievements demonstrate our emphasis on the importance of

employees and their contribution to sustainable growth. We have also won the Responsible Company award in Asia for three consecutive years.

Our first unit in Brazil was founded in 2017, in the city of Santo Antônio de Posse-SP. The Brazilian market proved to be a success and in 2021 the branch in the city of Manaus-AM was opened. Both units, Santo Antônio da Posse-SP and Manaus-AM, together employ almost 500 employees.

Our relevance in the Brazilian technology market has contributed to boosting technological innovation and promoting the advancement of the technology industry in the country **(GRI-2.7)**.

We are currently one of the main suppliers of memories to manufacturers of computer goods, electroelectronics, and distributors in Brazil. ”

Our Global Presence (GRI 2-1d)

The products manufactured in Brazil, at the Santo Antônio de Posse-SP and Manaus-AM units, are sold exclusively in Brazil (GRI 2-6 and GRI 2-1).





Awards

Since our inception, we at ADATA have placed well-being and corporate social responsibility at the center of attention. **The Enterprise Asia** awards affirm the reality of our commitment to raise awareness and improve the health of employees and society.



ADATA Awards: <https://www.adata.com/en/award>

Awards:
Product
Design.



Awards:
Exhibition
and Media





**Best Place to Work
in Greater China (2021)**

It reinforces the company's image as a responsible organization committed to the quality of life of its employees.



**Best Place to Work in the
United States (2022-2023)**

Almost 90% of the employees agreed with the following statement: "I feel I make a difference here". "Here I am treated as a full member regardless of my position".



**Best Place to Work
in Brazil (2022)**

ADATA's goal is to become the market leader and a technology brand with a competitive advantage that is attractive to employees and customers.



**Best Place to Work
in Taiwan (2021-2022)**

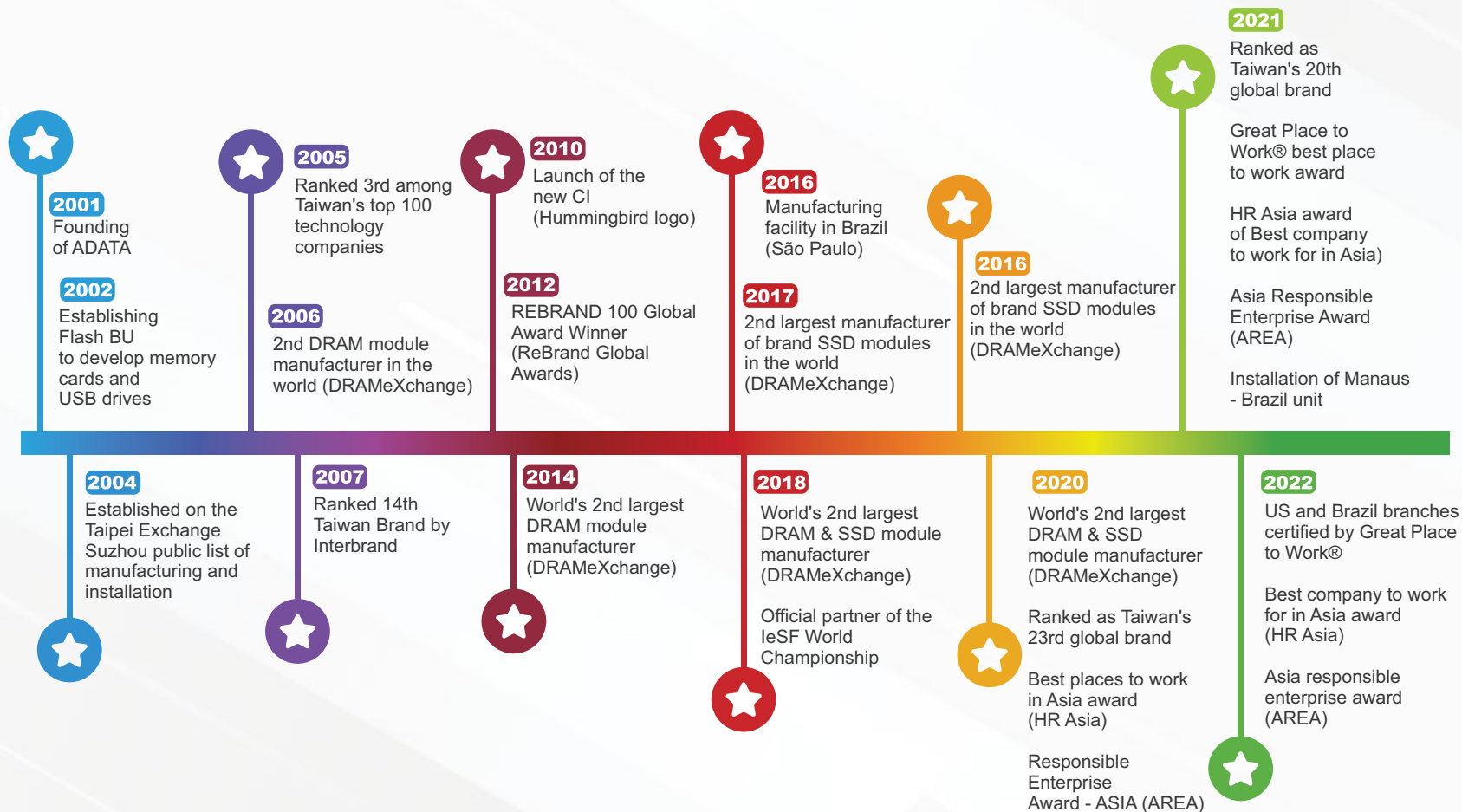
The certification validates an excellent workplace culture, which provides a healthy and balanced environment for its employees.

The commitment to employee's well-being, growth, and the quality of working relationships is recognized **everywhere we operate in the world.**



ADATA Worldwide

Brands and Achievements





ADATA IN Brazil

Headquarters - Santo Antônio de Posse - SP

As mentioned before, the Santo Antônio da Posse factory was the first unit in Brazil, a city about 150 km from the São Paulo capital. We are inserted in an industrial condominium, in an industrial area, i.e., our entire surroundings are surrounded by companies of various sizes. This makes it easier to distribute products and hire suppliers.

In the first three years, about US\$80 million were invested in the unit, creating about 300 direct jobs in the production of memories to supply the computer and electronics goods segment. Our production capacity is around five million semiconductors per month. The installation in Brazil received support from Investe São Paulo, an investment promotion agency linked to the Department of Economic Development, Science, Technology, and Innovation of the State of São Paulo. Our arrival in Brazil has increased the hardware and information technology production chain in the state of São Paulo.

Our production system consists of clean rooms, which are controlled environments used for manufacturing and testing semiconductors since contamination by particles present in the air interferes with the final quality of the product.

In this unit we have two types of operation called:

- **ADATA Integration- AI: Integrated Circuit Manufacturing.**
- **ADATA Electronics - AE: Manufacturing DRAM module, FLASH Memory, and Data Storage Products.**

Branch - Manaus - AM

The negotiations for the installation of the factory in the industrial hub of Manaus (PIM) began in 2020. The estimate of job generation was around 120 employees, today we have 170 employees (Dec. 2022).

In the year 2021, we obtained an environmental permit from the Institute of Environmental Protection of Amazonas (IPAAM), to start assembling DRAM and SSD memory modules, for computers and cell phones.

In less than a year, operating in the Amazonas capital, we have doubled our production, being four times larger than the production of our plant in São Paulo.

It is worth emphasizing that all actions taken at the ADATA Technology Brazil headquarters are replicated at the Manaus branch (**GRI 2-2**).

- **ADATA Electronics - AE: Manufacturing DRAM module, FLASH Memory, and Data Storage Products.**

Production Process

First, we go to the production process of AI (ADATA Integration), integrated circuit.

This process in Brazil is carried out exclusively in the Santo Antônio da Posse-SP unit. Manufacturing follows a sequence of several photographic and chemical processing steps, in which Wafer is imported and used as the main material, process:

Inflow: Input, raw material, water and packaging.
Process: Encapsulation of the integrated circuit.
Outflow: Recyclable waste, effluents, and hazardous waste.

The AE (ADATA Electronics) units in the cities of Santo Antônio da Posse-SP and Manaus-AM. They are responsible for the assembly process of memory modules and testing, that is, there is no manufacturing.

Inflow: Input, raw material, water, and packaging
Process: Assembly > Tests
Outflow: Recyclable and hazardous waste

Regarding occupational safety aspects, in all ADATA units in Brazil, the hazard and risk identified as most relevant is the ergonomic risk, however, it is not high. There is also no evidence of occupational diseases.

Regarding environmental issues, these units generate hazardous waste, which are boards and electronic parts, these are appropriately disposed of following the applicable legislation and part of this waste is sold for recycling by third-party companies.

Value Chain and Business Relations

We operate in the electroelectronic sector aiming to supply the Brazilian internal market **(GRI 2-6)** by producing memory solutions such as DRAM Memory Modules, SSDs, and Flash Memory.

For various applications such as Computers, Smartphones, Televisions, Machines, and Network System Equipment.

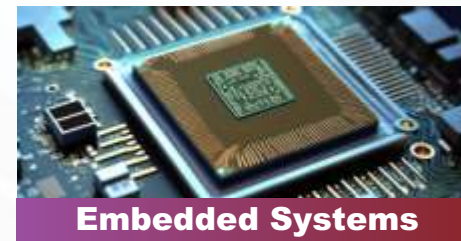
Serving the Artificial Intelligence, Automation, Healthcare, Communications Networks, Servers, Security, and Transportation markets **(GRI 2-6 b)**.

Our main suppliers are in 04 different countries such as China, Taiwan, the United States, and Japan, providing elements such as Wafer, Substrates, and SMD Boards.

Our Headquarters in SP is associated with the Abinee - Associação Brasileira da Indústria Elétrica e Eletrônica, ABISEMI - Associação Brasileira da Indústria de Semicondutores e CIESP - Centro de Indústrias do Estado de São Paulo. Our branch in Manaus has association with CIEAM - Centro da Indústria do Estado do Amazonas (GRI 2-6 c e 2-28).



Target Applications





GRI 2-6 b III

Note: There are no significant changes in items 2-6-a, 2-6-b, and 2-6-c because this is the first report (GRI 2-6 d).

4 Governance and Senior Management

- **ADATA Brazil**
- **Committee Structure**
- **Management System**
- **Impact Management**

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4 Governance and Senior Management

(GRI 2-9, 2-10, 2-11 and 2-12)

ADATA Brazil is a private company with two limited liability companies as shareholders, which act with respect and follow the best market practices.

Our governance structure in Brazil is represented by the President and Vice-President, supported by the other boards **(GRI 2-9)**.

For ESG-related topics, governance is currently supported by the Environmental Responsibility, Occupational Health and Safety, Social and Ethics Committee, and the nomination of the people in charge is based on their qualifications. **(GRI 2-10, 2-11 and 2-13)** The policies and procedures addressed in a complementary manner in the various sustainability topics enable governance with a strong focus on human rights and the environment **(GRI 2-23 IV)**.

We have an internal process for establishing goals and targets, based on the context of the organization, and our survey of aspects and impacts, hazards, and occupational risks. Our objectives and goals are defined and those responsible within the EHS team are appointed, depending on the topic other areas of the

company are included. The process is reviewed annually **(GRI 2-10)**. The management system is critically analyzed by the senior management, through strategic meetings and critical analysis that take place annually **(GRI 2-12)**.

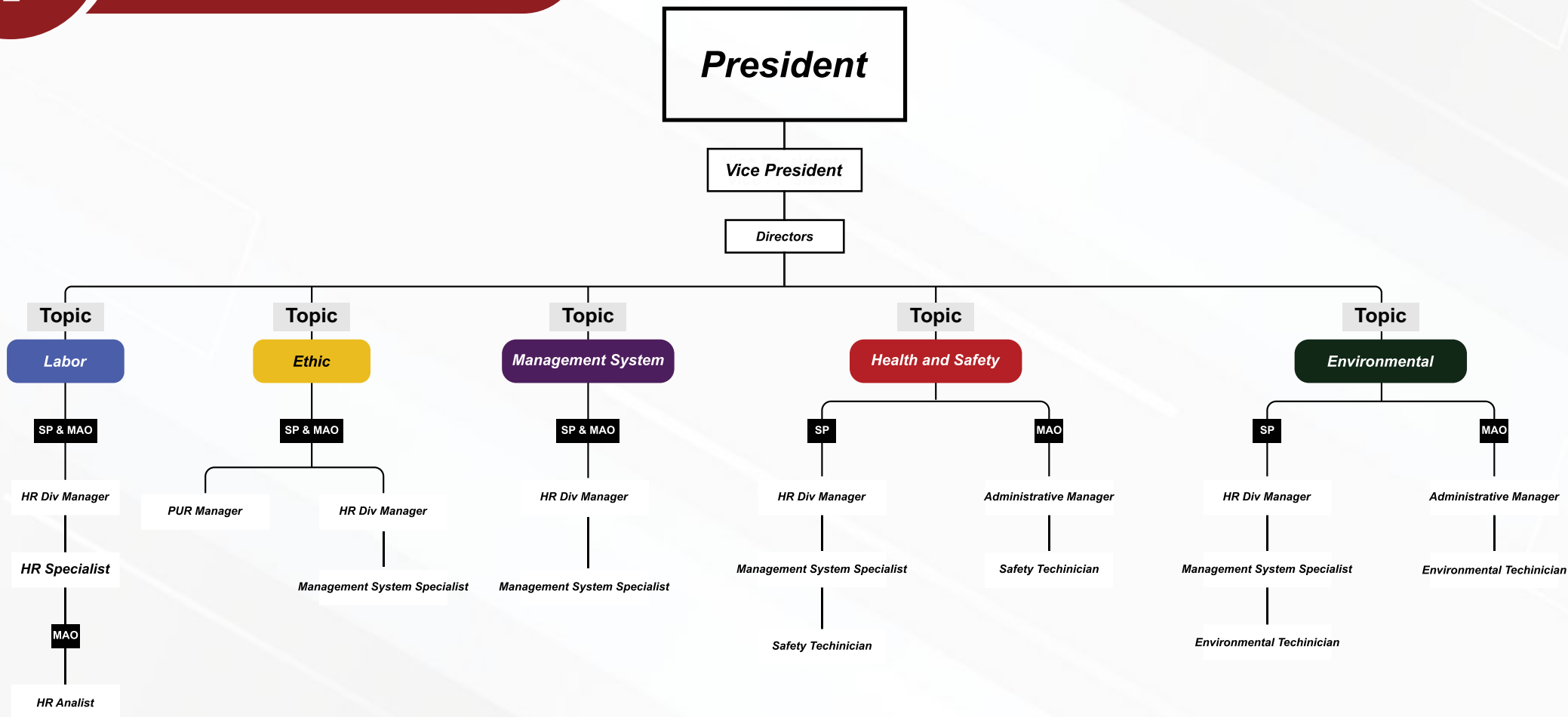
Every month the senior management and the executive board hold meetings with all employees, where the company's directions for the coming months are presented, as well as an overview of the performance, including successes and points for improvement. Future goals and objectives, growth plans, and organizational changes are also presented. At the end of the presentation, a moment is opened to answer questions, clarify doubts, and provide additional information **(GRI 402-1)**.

All the main EHS programs and actions are structured together with senior governance, in order to meet the expectations of our main stakeholders and legal aspects **(GRI 2-14)**.

In 2022, the Environmental Responsibility, Occupational Health and Safety, Social and Ethical Committee held alignment meetings for external audits, supported by the certifications that the company obtained in 2022 and all the actions that these certifications involve.

It also developed social activities that are reported in this document.





Key:

- Name of each area

SP = Headquarters - Santo Antônio da Posse - SP
 MAO = Branch - Manaus - AM



4 Governance and Senior Management

Management System

We have a management system with processes and tools that aim to manage our activities and resources efficiently and effectively, and through this system, we apply all the requirements of NBR ISO 14001:2015, NBR ISO 45001:2018, and the Code of Conduct of RBA Responsible Business Alliance, as a way to meet these requirements, an annual reassessment of due diligence is provided **(GRI 2-23 to II)**.

Within our management system, we consider the impact survey to be one of the most relevant processes since it will be based on it that we will establish our action plan. Our management system is critically analyzed by the senior management, through critical analysis meeting that takes place annually. As a way to ensure the continuous adequacy, sufficiency, and effectiveness of the established actions and goals **(GRI 2-12, 2-13, and 2-17)**.

The minimum inputs to be critically analyzed by management are:

- Follow-up actions to previous critical analyses.
- Change in internal and external issues, including developments in legal and other requirements related to environmental aspects, hazards and risks, and opportunities.

- Extension in which the objectives and goals were met.
- Information about the performance of EHS indicators and its management system, including trends regarding:
 - Incidents, non-conformities and corrective actions;
 - Result from monitoring and measurement;
 - Compliance with legal requirements;
 - Results of consultations with workers;
 - Result of audits;
 - Sufficiency of resources;
 - Communication coming from external stakeholders, including complaints.
- Opportunities for improvement.

We survey the aspects and impacts of our activity, as well as evaluate the hazards and risks. All environmental aspects and impacts classified as significant are duly controlled. All documents go through management approval **(GRI 2-16)**.

The performance of our Management System is evaluated according to the methodology of EHS indicators, which are analyzed on a monthly basis. Main indicators evaluated:

- Water Consumption;
- Power Consumption;
- Fuel Consumption - Nitrogen;
- Disposal of Treated Effluents;
- Waste Generation;
- Compliance with Legal Requirements;
- Occupational Accidents and Incident Registration;
- Occupational Health Certificates;
- EHS Training.

If the overall indicator exceeds the established limits, a Non-Conformity Report is opened in order to take the appropriate actions. In all our indicators we set precautionary limits so as not to cause harm in any social, environmental, or financial aspect **(GRI 2-23 III)**.

The information in the following tables refers to the verification of the effectiveness of the management system in 2022.

In general, the system's effectiveness indicator as a whole shows that the established goals were met, see the following table:

EHS EFFICIENCY INDICATOR 2022

INDICATORS	1° TRIMESTER		2° TRIMESTER		3° TRIMESTER		4° TRIMESTER	
	SP	MAO	SP	MAO	SP	MAO	SP	MAO
Total Water Consumption	✓	✓	✓	✓	✓	✓	✓	✓
Total Energy Consumption	✓	✓	✓	✓	✓	✓	✓	✓
Total Nitrogen Consumption	✓	✓	✓	✓	✓	✓	✓	✓
Total Disposition of Treated Effluents	✓	⚠	✓	✓	✓	✓	✓	✓
Solid Waste Generation	✓	✓	✓	✓	✓	✓	✓	✓
Legal Requirements Indicator	✓	⚠	✓	✓	✓	✓	✓	✓
EHS Training Indicator	✓	✓	✓	✓	✓	✓	✓	✓
Occupational Accidents	✓	✓	✓	✓	✓	✓	✓	✓
Occupational Health Certificates	✓	✓	✓	✓	✓	✓	✓	✓
Result	100%	78%	100%	100%	100%	100%	100%	100%
Goal (75%)	75%	75%	75%	75%	75%	75%	75%	75%

4 Governance and Senior Management

Management System

Another extremely important tool of our management system is the annual internal audits. Their objective is to identify and mitigate risks, evaluating the effectiveness of the implemented internal controls. They also contribute to improving operational efficiency, indicating areas where processes and procedures can be resized and improved. Ensure compliance with laws and regulations, always verifying compliance with requirements and their

implementation. In the year 2022, the annual internal audit was carried out in May, where 11 non-conformities were registered, all of which were dealt with through the NC and Corrective Action Report. This demonstrates the effectiveness of the management system. Another tool we use in our management system is the SWOT analysis or matrix, which has the purpose of verifying our strengths, weaknesses, opportunities, and threats, contributing to the

strategic planning of our actions so that we can assess our competitive position in the market and create strategies to improve our performance, i.e., it focuses on crucial concerns. (GRI 2-16) This matrix is presented annually to the senior management, with the purpose of discussing the strategies for the points raised (GRI 2-16). In the year 2022, our SWOT analysis showed the following results:

**Strengths**

- Existence of devices that optimize and reduce the consumption of electricity;
- Investments in processes and certifications;
- Clean Production;
- Geographic Location
- Zero occupational accidents;
- Providing resources for SG EHS improvement.

**Opportunities**

- NBR ISO 14001:2015 and 45001:2018 maintenance;
- Increased market share;
- Maintenance of the GHG Program;
- Ergonomic Program.

**Weaknesses**

- Bureaucracy in legal processes;
- List of impacts and risks.

**Threats**

- Constant changes in legislation;
- Legislation with government support and incentives in the technological area.

In 2022, the total number of crucial concerns reported to the highest governance body was in total 04 points, two threats, and two weaknesses (GRI 2-16 a b).



4 Governance and Senior Management



External verification of the management system (GRI 2-5 a)

The external verification of our management system, on the other hand, occurs by obtaining the certifications and awards that we have achieved along our journey.

In the year 2022, we were recognized, by GPTW, as one of the Best Companies to work for in Brazil. Also in 2022, our São Paulo headquarters and Manaus branch were

certified by NBR ISO 14064:2019, NBR ISO 45001:2018, RBA CMA Audit, in addition to the extension of NBR ISO 14001:2015 certification by the Manaus branch, in which the São Paulo headquarters has been certified since 2019 (GRI 2-5).

All entities and companies contracted for external verification are approved by senior governance, which always participates in the closing meetings of the external audits, with at least one of the members. After completion, the final report is presented to all parties involved, including members of senior governance (GRI 2-5 a).

Because it is a private company, it is not an evaluation criterion related to the topic (GRI 2-18).

It should be noted that external verifications are considered at ADATA BRAZIL as a whole, from senior governance to third-party employees (GRI 2-18). External audits, conducted by independent companies, take place annually, either to maintain certifications or to obtain new ones (GRI 2-18 b). So far none of the audit assessments have been responsible for changes in ADATA's BRAZIL highest governance body (GRI 2-18 c).

Management System

Sustainability report assessment (GRI 2-5 b, 2-14 and 2-17)

This document was externally assured by SGS, and is available on the Assurance Statement page on page 68 and in the annex (GRI 2-5 b).

The senior management, through meetings, accompanied the preparation of this sustainability report. The flow of information continued with the presentation of the data by the specialist on the issues addressed here, together with the HR manager. After the data was collected and defined, it was taken to the presidency for evaluation and approval (GRI 2-14 and 2-17).

The financial statements were prepared in accordance with CPCs (Accounting Pronouncements Committee), as well as the S.A.s law. They are audited annually. 2022 were audited by EY and are published physically and digitally in large circulation newspapers.



4 Governance and Senior Management

Management System

Legal requirements are surveyed, monitored, and registered through an external system contracted online that provides information on the legislation applicable to the business, it is a tool that keeps us up to date on the legislation in force, a valuable resource for the implementation of sustainable practices in our organization.

Every year we conduct an audit to verify the legislation system. In 2022, we had 2,515 legal requirements applicable and fully in compliance, no fines or lawsuits and/or legal non-compliance of any kind have been recorded.

It is worth mentioning that our internal policy meets several internationally recognized intergovernmental instruments, such as **(GRI 2-23 a)**:



- **Convention No. 154 of the International Labor Organization (ILO), Incentive of Collective Bargaining, 1951;**
- **Declaration on Fundamental Principles and Rights at Work, 1998;**
- **Convention No. 87 of the International Labor Organization (ILO), Freedom of Association and Protection of the Right to Organise Convention, 1948.**



(GRI 2-25, 3-1 and 413-1, 3-3)

Our impacts are surveyed following our internal procedure, which meets the ISO 14001 and 45001 certifications, listing the environmental aspects of our activities, with the impacts generated since the year 2019 and we review them annually or by any change in processes. There is a focus on the real, negative impacts, for their reduction and mitigation. Here we present the main impacts for the defined materialities, which are related to the Environment topics, such as Energy, Water and Effluents, and Waste **(GRI 3-3 - 302, 303, 305, and 306)** and also for the human rights topics **(GRI 3-3 - 401, 402, and 403).**

First, we assess each activity/sector, the aspect and impact arising from that activity, and whether the impact affects the surroundings (surrounding community). After that, we verify the frequency or probability, whether the impact is real or potential, probability or frequency, severity, and degree of the impact.

At any time, new impacts can be identified, when this occurs our EHS team evaluates the relevance and includes it in the company's list of impacts following the same procedures.

Impact Management

Relevant negative impacts of our activity

Aspect	Significant Negative Impactsect
Electricity Consumption	Reduced availability of natural resources
Waste Generation	Soil Pollution / Sanitary Landfill
Water Consumption	Change of Water Quality

For all the negative impacts identified we have control actions:

- LAIA - Survey of Environmental Aspects and Impacts, impact evaluation with the definition of mitigation or reduction measures - establishment of reduction goals;
- Verification of the possibility of impacting clean technologies, focusing on the reduction or non-generation. For example, the destination of electronic waste for recycling, which was previously destined for incineration;
- Adoption of sustainable practices, such as the efficient management of natural resources, such as the purchase of clean energy that we will start to carry out as of 2022;
- Emissions control - greenhouse gas inventory;
- Environmental education and awareness - our courses and training;
- Constant monitoring and supervision.

It is worth mentioning that our impacts are discussed with our employees through CIPA and Emergency Brigade meetings.

Besides the reported negative impacts, we have a list of significant positive impacts that contribute to the promotion of sustainable development.



4 Governance and Senior Management

Impact Management

Relevant positive impacts of our activity

Aspect	Significant Negative Impactsect
Hiring of approximately 500 employees	Creation of opportunities
Purchase of clean energy	Reduction of environmental pollution
Encouraging the religious practice of all faiths, respect, diversity, and human rights.	Religious freedom and tolerance
Development and training program, courses, education	Creation of opportunities
Incetive to health, vaccination, eye examination	Increase in health
Donations of clothes, food, supplies for the community	Increased general well-being
Technical course for employees and community	Reducing inequality
Deployment of computers in the Training Room area for employees to have access to internal systems.	Encouraging digital inclusion
Implementation of beanbags and foosbal table in the rest area for the employees to use during the break	Increased general well-being
Donation of food and hygiene products for children in need from Lar Feliz	Increased general well-being
Partnership with UniFAJ (Jaguaríuna) to offer discounts for employees in undergraduate and graduate courses.	Creation of opportunities
Partnership with KNN Idiomas school (Jaguaríuna) to offer discounts for employees on language courses.	Creation of opportunities
Partnership with Minds English School (Manaus) to offer discounts for employees on English courses.	Creation of opportunities

Our positive impacts are currently not monitored. Our goal is to develop procedures for measuring these impacts. So that in the coming years, our report will be accompanied by verification of the effectiveness of each action.

Material Topics (GRI 3-1 and 3-2)

For the definition of material topics, we considered the following information:

- Internal verification of the impacts, following the ISO 14001 management system, considering the company's strategic vision.
- Questionnaire to our stakeholders to get an impression of the relevance of each topic and/or impact of our activity, conducted in February 2023.

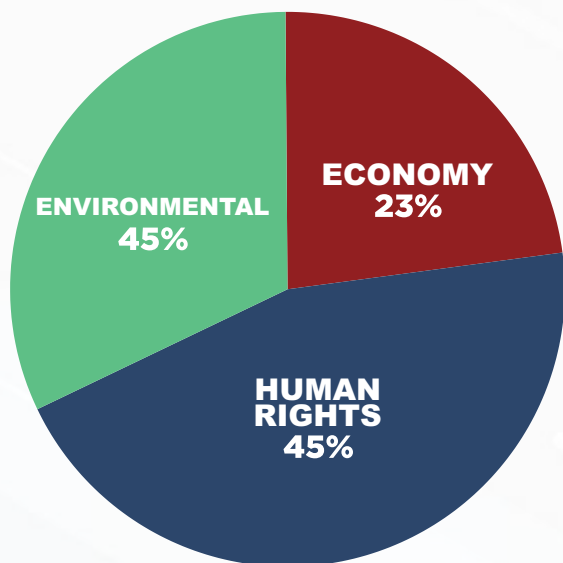
We sent the questionnaires to the following group of stakeholders:

- Employees
- Shareholders;
- Suppliers;
- Service providers;
- Community;
- Government body; and
- Customers

We sent the questionnaire to 89 stakeholders, and we got 30% of the responses. The questionnaire evaluated as important all the answers whose more than 70% of the respondents considered very relevant.

Based on these answers obtained by our stakeholders, who answered the questionnaire sent to them, we found that the most relevant topics for this public are divided as follows:

4 Governance and Senior Management



We are undergoing a restructuring in the evaluation and definition of stakeholders, moving away from the traditional and internal view to broader participation and clarity for all existing stakeholders. Thus, we will create forms of communication that allow us to reach the stakeholders in their entirety.

On the other hand, the identification of impacts is very well mapped and validated by the organization's internal procedures, as well as their relevance evaluation.

Therefore, we reorganized the various environmental aspects and activities of the organization to identify the main environmental impacts and relate them to GRI topics.

Obtaining this data is a valuable tool for our organization, and assists us in defining the materiality of this report, as well as helping to direct some of our actions, thus building a strong, long-term relationship with our stakeholders. Based on our impacts and our stakeholders' answers, we have defined the following material topics (GRI 3-2).




We understand that the material topics should be revised according to the improvements in communication with stakeholders and the revision of policies and procedures according to the recommendations of the GRI Standard.

5 Human Rights

- Code of Ethics
- Responsible Business Conduct
- Stakeholders
- Employees
- Fluctuations
- Remuneration Policy
- Frequency Control
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- Social Actions

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5 Human Rights

Code of Ethics

(GRI 2-23 III, GRI 2-11 ,2-15, GRI 2-24 and GRI 406)

Our code of ethics and conduct implemented in 2018 has the purpose of promoting integrity, honesty, and transparency in the activities of all individuals in our organization. Through clear guidelines on how all professionals, senior management, shareholders, and employees should behave in situations where their personal interests may conflict with their professional duties. Thus helping to prevent possible conflicts of interest **(GRI 2-24)**.

In addition, we follow the Electronic Industry Code of Conduct, the RBA (Responsible Business Alliance), which is a non-profit organization that leading electronics companies join in order to improve social, environmental, and ethical conditions.

It supports us in promoting clear and measurable benefits for organizations in supply chains, including increased productivity and quality and reduced worker turnover, injuries, and illnesses. It also allows ADATA BRAZIL to demonstrate its social responsibility to society by entering into international contracts or expanding locally to accommodate new businesses. The code of conduct has been widely adopted as the standard social responsibility rule for the entire electronics and

ICT (Information and Communications Technology) industry.

When there are conflicts of interest, our code defines that professionals must first avoid situations that may generate a conflict of their own interests with the interests of ADATA BRAZIL and, when this is not possible, refrain from representing the company in the matter in question, communicating the fact immediately to the superior or peers. **(GRI 2-15)**

If any employee identifies that someone is performing an activity or role that generates a conflict of interest, he/she may contact one of our communication channels to report the fact (see item "Stakeholders" page X) **(GRI 2-15)**

In addition, our guidelines focus on the commitment to the sustainable development of the regions where we operate, on compliance with environmental legislation, on acting with social responsibility and respect for human dignity, and on performing our daily activities respecting the defined health and safety aspects.

Distorting the numbers or accounting

characterization of items that may be reflected in ADATA's BRAZIL management reports or financial statements is considered intolerable conduct and subject to disciplinary measures.

These are just a few examples of our guidelines that contribute to all professionals maintaining integrity and honesty in their professional activities, ensuring the well-being of everyone involved.

Our code of ethics has a Committee composed of members of the Board of Management, Management, Specialists, and Employees who are key to the development of the actions performed **(GRI 2-23 d, GRI 2-24)**.

To ensure that our code of ethics is preserved by everyone, we make means of communication available so that, in situations that characterize a violation of the Ethics and Conduct policy, they are immediately communicated to the members of the Ethics Committee. It is worth noting that there were no cases of discrimination that occurred during the reporting period **(GRI 406)**. All stakeholders directly involved with ADATA BRAZIL are introduced to the code of ethics and sign the receipt and commitment term **(GRI 2-23 c and 2-23-f)**.





5 Human Rights



Responsible Business Conduct (GRI 2-23 AND 2-24)

Our Social Responsibility regulation aims at responsible business conduct based on compliance with all applicable business laws and regulations, both by our employees and by our suppliers and partners.

Everyone is expected to adopt the high standards and commit to continuous improvements related to ethical behavior, environmental responsibility, health and safety, and labor practices in compliance with local law and international standards.

Participants undertake to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community. This applies to all employees, including temporary, migrant, student, freelance, third party, and any other type of employee. The established labor standards are:

- Free choice of employment;
- No use of child labor at any stage;
- Working hours in compliance with the legislation;
- Wages and Benefits in compliance with laws and regulations;
- Non-discrimination;
- Freedom of association;

The Participants recognize that, in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy work environment improves the quality of products and services, consistency of production, worker retention, and worker morale.

The Participants also recognize that worker feedback and ongoing training are essential to identifying and solving health and safety problems in the workplace. The applicable health and safety standards are:

- Occupational safety practices;
- Preparation for emergencies;
- Procedures to prevent occupational injuries and illnesses;
- Industrial hygiene;
- Evaluation and control of physically demanding work;
- Sanitation, food, and housing;
- Health and Safety Communication.

The Participants recognize that environmental responsibility is a requirement for manufacturing world-class products. In manufacturing operations, adverse effects on the community, environment, and natural resources need to be minimized while protecting the health and safety of the public.

The environmental standards are:

- Obtain all necessary environmental permits;
- Pollution prevention and resource reduction;
- Hazardous substance management;
- Solid waste management;
- Control of atmospheric emissions;
- Compliance with material restriction laws/standards/policies;
- Water management;
- Energy efficiency;
- Methods of controlling greenhouse gases.

To meet social responsibilities and achieve market success, Participants and their agents must maintain the highest ethical standards, including:

- Business Integrity;
- Do not obtain undue advantage;
- Transparency in information disclosure;
- Respect for intellectual property rights;
- Maintained business standards, advertising and fair competition;
- Identity protection and non-retaliation policies;
- Responsible management of minerals;
- Privacy of personal information.



5 Human Rights

Participants must adopt or establish a management system whose scope is related to the content of this Regulation. The management system must be designed to ensure: compliance with applicable laws, regulations, and customer requirements related to the Participant's operations and products; compliance with this Regulation; and identification and mitigation of operational risks related to this Regulation. The management system must also facilitate continuous improvement. The management system must contain the following elements:

- The company's commitment to social responsibility;
- Duties and responsibilities of management - senior executives;
- Meet legal and customer requirements;
- Risk analysis and management;
- Goals for social performance improvements;
- Training;
- Clear and accurate communication of information;
- Feedback, participation, and worker's complaints;
- Audits and assessments;

- Corrective action process;
- Documentation and records;
- Liability of the supplier.

The Environmental, Occupational Health and Safety, Social, and Ethical Responsibility Committee is responsible for the implementation and verification of the Social Responsibility Regulation **(GRI 2-9 and 2-10)**.

The training for Social Responsibility Conduct is always held on the employee's admission date, where he/she receives information and the complete regulation. Annually, we conduct refresher training for all employees and senior management, where an effectiveness evaluation is applied, thus ensuring that the content is understood.





5 Human Rights



Stakeholders

(GRI 2-16, 2-25, 2-26, 2-29)

In order to ensure that all relevant perspectives are considered when making decisions, we have a Stakeholder Regulation. The general purpose of this regulation is to establish guidelines for the management of suggestions, compliments, criticisms, and complaints received. All employees, suppliers, customers, and other interested parties are subject to this policy. We will annually apply the questionnaire carried out this year, addressing the following groups of stakeholders:

- Employees;
- Shareholders;
- Suppliers;
- Service providers;
- Community;
- Government body; and
- Customers

Employees (stakeholders)

Our employees can record their suggestions, compliments, criticisms, and/or complaints through three channels:

- Physically/personally: direct suggestions, compliments, criticisms, and complaints directly to any member of the ethics and responsibility committee;

• Suggestion box: made available in the company's common passage and rest area.

• Website: through ADATA's BRAZIL website where there is a contact page that has the option to report:

<https://corp.adata.com/pt/support/online>

(Registration submission is received in the HR Manager's e-mail only).

It is worth pointing out that our social responsibility regulation provides for identity protection and there is no retaliation. The channels mentioned above guarantee the confidentiality, anonymity, and protection of informers (**GRI 403-2b**), and external stakeholders can use our website for any questions, compliments, or criticisms.

The HR management meets with the board every month to assess the results of suggestions, compliments, criticisms, and/or complaints reported by employees in the previous month.

It is at this point that the board approves the viable suggestions and provides resources for their implementation, and also determines the actions for compliments, criticisms, and/or complaints.

In 2022, 09 criticisms, 03 compliments, and 58 suggestions were received, 10 of which were

viable and performed.

Suppliers (stakeholders)

For us at ADATA BRAZIL, the commitment to our policies and procedures must be carried out by everyone involved in our processes, including our suppliers.

For this, within our purchasing and import department, we have adopted guidelines aimed at ensuring that our main suppliers and partners commit to the established criticality levels.

In order to ensure full compliance with internal and legal requirements, our suppliers must be aware that they are committed to following the rules established in our Social Responsibility Regulation, submitting evidence of compliance with applicable legal requirements, and filling out a questionnaire called the "Self-Assessment Questionnaire", which is applied to suppliers established by the management system, where each answer must be accompanied by evidence.

After filling the questionnaire, our EHS team evaluates the responses, and scores and ranks the companies. 50% of our suppliers and partners are eligible for self-assessment.



5 Human Rights

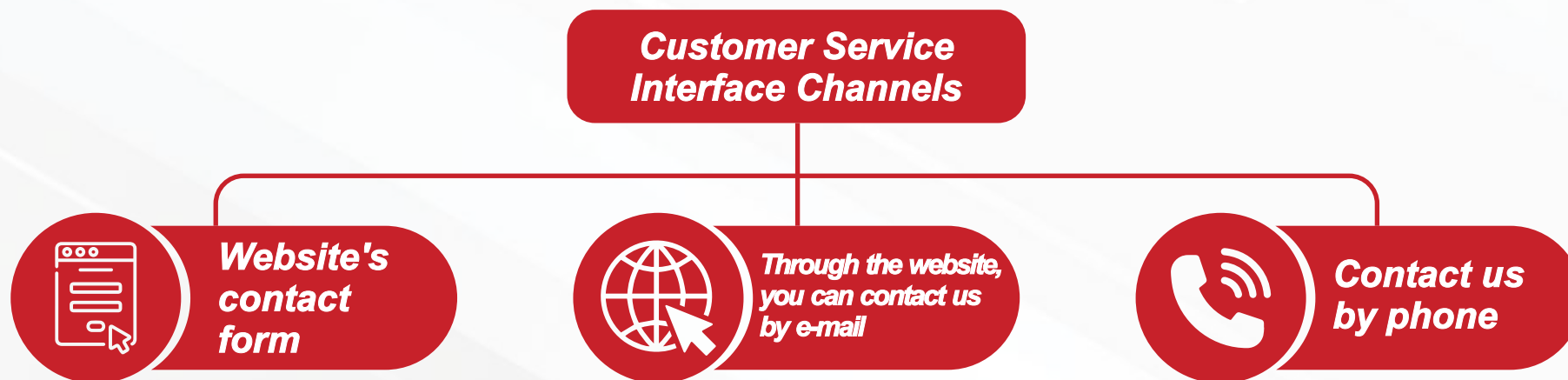
Stakeholders

(GRI 2-16, 2-25, 2-26, 2-29)

When performing the service/activity, all non-conformities found in our partners and suppliers are registered and notified. That is where we ask that they show the corrections through an action plan and the results of the negotiations. In the year 2022, we had 90 non-conformities forwarded to our partners and suppliers, which were handled through the Non-conformity Report and Corrective Action document. In the year 2022, no contracts with our suppliers were terminated due to issues related to negative environmental impacts or risk actions.

Customers - Stakeholders

Our customers are our first priority. We place great emphasis on excellent service and act quickly on customer feedback to improve our operations and procedures.





Respect is the key
for good work!



ADATA has the social commitment
to provide a friendly work
environment for its employees,
sharing respect at all levels.

”





5 Human Rights



Employees (GRI 2-7 and GRI 401)

We believe that work, in addition to being the main means of human survival, is also the key to our success. It cannot be viewed simply as something with the sole purpose of producing our products, we know the impact that the employability of our units has on their regions of operation and we always seek to show our commitment to the creation of these job opportunities. In 2022, ADATA achieved expressive growth both in São Paulo and, mainly, in our Manaus branch. Our expectation for the coming years is to further increase our production lines and thus generate more jobs and growth opportunities also for those who are already employees.

As of December 31, 2022, we had 466 direct employees working effectively in our units in Brazil, and 42 third-party workers, totaling **508 permanent hired employees at ADATA Brazil.** (GRI 2-7 a and b)

Santo Antônio de Posse - SP unit (Dec/2022) - (GRI 2-7 b I to V) - 2-7 c 2-8

Description	Female	Male	Other	Not Informed	Total
Permanent direct contract	110	185	None	None	314
Permanent third-parties (GRI 2-8)	16	03	None	None	
Temporary	None	None	None	None	None
No guaranteed workload	None	None	None	None	None
Full-time	126	188	None	None	314
Part-time	None	None	None	None	None

Outsourced employees at the Santo Antônio da Posse - SP unit represent the following roles (GRI 2-7 a and b) and GRI 2-8:

- 10 of Property Security.
- 08 Cleaning and Conservation



5 Human Rights



Employees (GRI 2-7 and GRI 401)

Manaus - AM unit (Dec./2022) (GRI 2-7 b I to V) - 2-7 c and 2-8

Description	Female	Male	Other	Not Informed	Total
Permanent direct contract	78	93	None	None	194
Permanent third-parties (GRI 2-8)	18	05	None	None	
Temporary	None	None	None	None	None
No guaranteed workload	None	None	None	None	None
Full-time	96	98	None	None	194
Part-time	None	None	None	None	None

Outsourced employees at the Manaus- AM Unit represent the following roles (GRI 2-7 a and b) and (GRI 2-8):

- 12 of Property Security;
- 05 of Cleaning and conservation;
- 05 of Restaurant.
- 01 Nurse



5 Human Rights



Employees (GRI 2-7 and GRI 401)

100% of our direct employees are covered by collective bargaining agreements. Indirect and third-party employees are associated with their respective companies, and we receive the percentage and insert them in the contract (GRI 2-30).

TOTAL Employee Ratio (GRI 2-7 a and b)

Type of contract and agreement	Santo Antônio de Posse - SP Unit	Manaus - AM Unit	Total
Permanent direct contract	295	191	508
Permanent third-parties (GRI 2-8)	19	23	
Temporary	None	None	None
No guaranteed workload	None	None	None
Full-time	314	194	508
Part-time	None	None	None

* Refers to December 31 (GRI 2-7 c)



5 Human Rights



Fluctuations

Regarding fluctuations, in the year 2022, 110 employees were dismissed, and 221 employees were admitted. Considering the last three years, it is noted that the fluctuation recorded in the year 2022 is not a significant fluctuation; it is part of the process and demands of the sector. It is worth mentioning that the year 2020 was an atypical year, due to the pandemic that affected the entire planet **(GRI 2-7 e)**. The values presented in this item correspond only to ADATA's direct employees. Regarding outsourced employees, there were no significant fluctuations. **(GRI 2-8 c)**

Employee fluctuation in the last three years (GRI 2-7 e)

YEAR 2020		YEAR 2021		YEAR 2022	
Dismissal	Admissions	Dismissal	Admissions	Dismissal	Admissions
60	50	88	255	110	221



Fluctuations

As a way to also meet the requirements of GRI 401-1, the following is a list of the total number and rate of new employee hires during the reporting period, broken down by age group, gender, and region (**GRI 401-1 a and b**).

Number and Admission Rate (GRI 401-1 a)

		AE	AI	AEMAO
Age	00~30	13	22	25
	30~99	31	43	87
Sex	M	17	42	57
	F	27	23	55
Place	SP	44	65	0
	AM	0	0	112

		AE	AI	AEMAO
Age	00~30	11%	14,9%	15,2%
	30~99	26,3%	29,1%	52,7%
Sex	M	14,4%	28,4%	34,5%
	F	22,9%	15,5%	33,3%
Place	SP	37,3%	43,9%	0%
	AM	0%	0%	67.9%

Number and Turnover Rate (GRI 401-1 b)

		AE	AI	AEMAO
Age	00~30	8	8	5
	30~99	24	20	45
Sex	M	23	16	33
	F	9	12	17
Place	SP	32	28	0
	AM	0	0	50

		AE	AI	AEMAO
Age	00~30	6,8%	5,4%	3,0%
	30~99	20,3%	13,5%	27,3%
Sex	M	19,5%	10,8%	20%
	F	7,6%	8,1%	10,3%
Place	SP	27,1%	18,9%	0%
	AM	0%	0%	30.3%

AE - ADATA ELETRONICS - SP HEADQUARTERS

AI - ADATA INTEGRATION - SP HEADQUARTERS

AEMAO - ADATA ELECTRONICS - MANAUS BRANCH



5 Human Rights

Remuneration Policy (GRI 2-19 and GRI 2-20)

Our remuneration policy for all employees includes salary ranges for different positions, a variable remuneration system, such as bonuses and profit sharing, and individual performance evaluation to determine salary increases. It aims to be fair and transparent, ensuring that our employees are paid according to their performance and contribution to the organization, as well as in relation to the market and the competition. We conduct regular salary surveys to monitor market trends and ensure that our employees' remuneration is competitive, as well as to attract good professionals. We offer additional benefits such as health plans, dental plans, transportation vouchers, food vouchers, meal vouchers, daycare assistance, and maternity leave, as presented in the chart.

The current Environmental and Social goals are not applicable to the business, we are in continuous development of this process.

Benefits (GRI 401-2)

Description	Employees ADATA	Apprentices	Temporary	Outsourced
Health Plan	😊	😊		
Dental Plan	😊	😊		😊
Transportation Voucher	😊	😊	😊	😊
Food Voucher	😊	😊		😊
Meal Voucher	😊	😊	😊	😊
Life Insurance	😊	😊	😊	😊
Daycare Assistance (children up to 18 months old)	😊	😊		
Maternity Leave (120 days)	😊	😊	😊	😊
Paternity Leave (5 days)	😊	😊	😊	😊



5 Human Rights

Attendance Control Regulation (GRI 2-7 AND 401)

We have a regulation for attendance control, with the purpose of standardizing negotiations and solving possible divergences in the employees' attendance control.

The time control of our workers is carried out by means of an electronic time recording system. The attendance control is established according to the annual calendar (object of union negotiation - validated annually by means of a meeting with the employees).

We guarantee that working days, whether regular or extraordinary, are provided as 1 day off out of 7 consecutive days of work.

Regarding overtime, the overtime limit, added to the normal daily hours, cannot exceed 10 hours. The normal weekly hours plus weekly overtime may not exceed 56 hours in a week.

Maternity and paternity leave

Regarding maternity and paternity leave, we follow the Brazilian legislation, ruled by the Consolidation of Labor Laws (CLT) and by Law No.11,770/2008, where all direct employees are entitled to take maternity/paternity leave (GRI 401-3 a).

Maternity leave is guaranteed to pregnant, adopting employees (Law 10,421/2002 - children up to 12 years old), and to those who have had a miscarriage.

The leave lasts 120 days, with the possibility of extending it for another 60 days in specific cases, such as the baby's prematurity. During this period, our employee is entitled to full remuneration, guaranteed by ADATA, and subsequently compensated by Social Security (GRI 401-3 a).

Paternity leave, on the other hand, lasts for 05 days (GRI 401-3 a). ADATA is considering joining the Citizen Company Program within the next 5 years, which provides tax incentives for companies that adopt paternity and maternity support practices.

In the year 2022, we had 6 leaves for maternity leave and 6 leaves for paternity leave (GRI 401-3 b).

Regarding returning to work, out of the 12 employees, only one did not return to activities (GRI 401-3 c).

It is noteworthy that of these 11 employees who returned to work, 03 completed the 12 months in the company after their leave, two maternity leaves, and 1 paternity leave. The other 08 will probably complete the 12 months during the course of this year (GRI 401-3 d).

The return-to-work rate ratio is around 92%. Regarding retention, this figure will be presented in the next report, since not everyone has completed one year of leave.





5 Human Rights

Operational Changes (402-1)

As already presented in the Governance topic, we have a monthly meeting with all employees where our goals and changes for the coming months are presented. However, we have a Change Management procedure, which aims to establish a system to ensure that risks arising from any form of changes to processes, process equipment, or associated components and facilities are systematically identified, assessed, and managed before the change is implemented. Thus, ensuring the reduction of health and safety risks to employees and the environment.

Our procedure is based on the fact that once a change is identified, the person responsible for the change must notify the person in charge of EHS, who will then assign a person responsible for his/her team to evaluate the change. Subsequently, the results of this assessment are shared with those involved in the change process.

Thus, in addition to preventing possible impacts generated by the future change, this procedure allows everyone involved in the change to obtain prior knowledge and to be able to give an opinion about the change **(GRI 402-1)**.





5 Human Rights

Social Actions

We at ADATA recognize our corporate social responsibility, therefore we have actions that aim to contribute to the improvement of the quality of life of employees, in addition to contributing our share in solving social problems.

In line with our social practices, the Electronic Industry Code of Conduct, the RBA (Responsible Business Alliance) also guides us and brings several guidelines that we seek to implement in our units.

Free Religious Practice

We believe that religious freedom is a powerful tool to fight prejudice. Allowing people to express their faith and beliefs without fear of persecution or discrimination contributes to the promotion of cultural diversity, and allows people to live in harmony despite their differences.

With that, we at ADATA, in 2019 in consensus with the Senior Management, decided that every Wednesday, the training room is reserved for religious practices. Employees who wish to use the place can make a prior appointment with the HR department, respecting the times available specifically for this purpose.

During the last quarter of 2022, the room was used on a regular weekly basis. Showing that the initiative is a success due to the participation of the employees.

Development and Training Program

Promoting a continuous learning environment is one of our goals, as we believe that education is the path to a better future. Moreover, investing in our talents provides us with a creative and innovative environment, helps us retain our talents, and increases overall satisfaction.

We offer technical courses to our employees and the community.

We have a partnership with the university UniFAJ (Jaguariúna) to offer discounts for employees in undergraduate and graduate programs. In addition, we offer discounts on English courses through our partnership with the school KNN Idiomas (Jaguariúna) and Minds English School (Manaus).

Health incentive (GRI 403-6)

As a means of promoting and encouraging health, in 2022 we promoted a flu vaccination campaign for all our employees and fixed third

parties in our units in Brazil.





5 Human Rights

Social Actions



Digital Inclusion

In order to encourage and facilitate the use of computers by all employees to perform internal training via our E-Learning platform, access work procedures and instructions, and run applications in our internal system, we have created "Digital Inclusion" spaces where computers are made available.

Breastfeeding Room

The breastfeeding period for newborn babies is a crucial stage in their development, that said, we provide an exclusive support space so that women returning from maternity leave can empty their breasts and store their milk with comfort, privacy, and safety.

Well-being

With the purpose of improving the general well-being of our employees and promoting a comfortable rest time for everyone, where the stress of work activities can be unloaded. In 2022, we implemented beanbags and foosball tables in our rest areas.

Donations

Our donation campaigns have been a success, in 2022 we donated food, cleaning, and personal hygiene products to the children in need of Lar Feliz - located in the city of Jaguariúna/SP.

We also have an annual campaign, which always takes place in the middle of June and July, where we collect warm clothes that are intended for the community in the cities in the region where our headquarter is located.

Environmental, Occupational Health, and Safety Commitments



Meet the legal, environmental, health, occupational safety, and other requirements subscribed by the Organization;



Act preventively to eliminate or reduce the risks to occupational health and safety and the integrity of the facilities, through the participation of employees and their representatives;



Protect the environment and mitigate pollution arising from its activities through the correct disposal of waste and effluent discharge within acceptable standards as required by law;



Promote a healthy and safe work environment to prevent injuries and health problems;



Make employees aware of the sustainable use of natural resources in order to control their environmental aspects and impacts;




Continuously improve the Environmental, Occupational Health, and Safety management system, seeking viable improvement alternatives to the business.

A background image showing three workers wearing hard hats and safety glasses, looking at a document or tablet. The image is overlaid with an orange tint.

6 Occupational Health and Safety

- A Safe Environment
- Preparation for Emergencies
- Occupational Health
- Epidemiological Diseases
- Risk Management Program
- Machine Protection
- LPR - Occupational Hazards and Risks
- Health and Safety Communication
- Risk Assessment Procedures
- Hearing Conservation Program
- Respiratory Protection Program
- Ergonomic Management Committee
- Incidents and Accidents

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6 Occupational Health and Safety



Ensuring a safe and healthy environment for all direct and indirect employees is one of our commitments since ADATA's founding, which was strengthened with the creation of the EHS Management System in 2019. Since then, we have sought to implement several actions in order to meet all the legislations, national and international certifications, in addition to commitments established with our stakeholders.

We recognize that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy work environment improves product and service quality, production consistency, worker retention, and his/her morale **(GRI 403-1)**.

We believe that employee feedback and ongoing training are essential to identify and solve work-related health and safety problems.

The employee's exposure to physical, chemical, and ergonomic safety risks is identified, evaluated, and controlled by means of technical reports, programs, procedures, and projects **(GRI 403-7)**.

Where risks cannot be properly controlled by the means described above. Workers are trained on the risks associated with these hazards, and appropriate personal protective equipment is made available to them.

Preparation for Emergencies (GRI 403-5)

Possible emergency situations and events are identified and assessed, and their impact is minimized through the implementation of emergency plans and response procedures, including: brigade training conducted in the practical field, simulated emergency scenarios, reports, monthly meetings between brigade members, and preventive maintenance and recovery plans.

Occupational Health (GRI 403-3)

In line with the commitment to provide a healthy work environment, the "Life Care Program", implemented in 2019, continuously seeks, through internal communication awareness actions with relevant topics every month, some of the topics addressed in 2022:

ADATA's structure and working environment are:

The Occupational Health Medical Control Program (PCMSO) is also an important management tool in the prevention of employee health, we have the support of a specialized occupational physician in each of our plants in Brazil, who works together with ADATA to establish exams and health parameters that are correlated to the risks of each employee's role, aiming to prevent possible damage to health. In 2022, our employees performed over 383 admission and periodic exams in our São Paulo unit and 160 in the Manaus unit, all the results are followed up by the occupational physician who performs the personal health management of each employee.

For pregnant women, we have a systematic assessment of the activities that involve risks to the employees' health, where we take the necessary measures to adapt the scope of work to meet the needs.

Epidemiologic Diseases

Since we received the communication from our headquarters in Taiwan of the risks and actions that would be required due to COVID-19 in early 2020, even before the pandemic was decreed worldwide,

6 Occupational Health and Safety



we created a Health Committee coordinated by the Operational Board, which is still active, focused on the management and creation of control actions that could contribute to reducing the impact on the health of employees and their families.

The containment actions carried out were based on a contingency plan for epidemiological diseases.

Some of the various actions taken by the committee: dissemination of information and tips on self-care and prevention, supply of PFF2 masks for all employees, exclusive support from the occupational physician and health plan application, carrying out PCR and Antigen tests, checking the temperature of all employees, installation, and availability of sanitizer dispensers at various points within the company, installation of barriers and social distancing, intensified hygiene in all areas of the company. All actions followed the recommendations of the Ministry of Health and the World Health Organization.

Risk Management Program

The Risk Management Program (RMP) implemented in 2022 is one of

ADATA's most important tools, through which we survey all the risks inherent to the activities that each employee develops, considering them in Homogeneous Exposure Groups (GHE), which are grouped by similar exposure profiles. As a result of this program, multidisciplinary and systematized actions are planned to reduce the risks identified, some of the results in 2022 were other programs such as PPR and PCA, which we will comment on shortly.

Machine Protection

Since the company's founding year, we have surveyed and evaluated the existing protections on machinery and equipment, thus ensuring that we are in accordance with all current legislation. In 2022, we will update this work, in which we are implementing the identified adjustments and improvements.

LPR - Occupational Hazards and Risks

Aiming to meet the requirements of our NBR ISO 45001:2018 of Occupational Health and Safety certification, our EHS Management System is responsible for conducting the Survey of Hazards and Risks (LPR), which is available for access by all employees in a public internal directory of

EHS and in the Internal System, as well as being distributed in printing at strategic points internally.

All occupational risks classified as "critical" and "not acceptable" are duly controlled, being reclassified as "under control" or "acceptable" and their controls are evidenced.

One of the results of the risk control and management methodology is the Preliminary Risk Assessment (APR), used for routine risk activities performed by the Facilities department, and the Work Permit (PT), used to assess and release special activities. Both assessments are included in the APR Procedure and PT.





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Health and Safety Communication (GRI 403-5)

"EHS Trainings and Dialogues" is one of the metrics that are part of our "EHS Indicators", in which all the main training that involves the area are included, for the theme of health and safety, in 2022 over 26 trainings and dialogues were held in the São Paulo unit and 22 in the Manaus unit, some of which were:

- NR11 for employees who operate electric pallet trucks.
- NR10 for technical employees who work with activities involving electricity.
- NR35 for employees who carry out activities above 2 meters in height.
- NR20 for employees responsible for storage, handling, and manipulating flammable products.
- Firefighter qualification training.

On the first day at work, whether an ADATA's direct employee or a third party, he/she participates in the "New Employee Integration" in which he/she receives several important information so that he/she can successfully start his/her path with us, and Health and Safety is one of the topics that are included as an agenda,

in 2022 more than 220 new employees were integrated, in the end, they were evaluated in order to verify the retention of the contents addressed.

Our Internal Week for the Prevention of Occupational Accidents and the Environment (SIPATMA), organized by the Internal Commission for Accident Prevention (CIPA), has always been a success in terms of participation, and in 2022 it was no different, we carried out awareness intervention actions for a week in company areas with all employees, providing moments of relaxation and awareness of important topics such as safe travel, stress and anxiety, environment, men's and women's health + STD, ergonomics.

Risk Assessment Procedures

In addition to the Environmental, Occupational Health, and Safety policy, we also have a series of internal procedures for identifying hazards, risk assessment, and incident investigation (GRJ 403-2).

The procedures are carried out by the managers of each area, who analyze the hazards and assess the risks according to the area's activity. These informations are

submitted to the EHS team that identifies and classifies the risks raised by managers. According to its classification, each identified risk is registered and becomes part of the monitoring by the EHS team.

Employees can identify hazards in their area and trigger the EHS team, in addition to recording them through the "incident records" strategically distributed throughout the company.

Hearing Conservation Program - PCA

Aiming to prevent hearing loss in employees exposed daily to noise, we implemented the Hearing Conservation Program (PCA), which was prepared in accordance with Regulatory Standards NR01 - PGR (Risk Management Program); NR07 - PCMSO (Program for Medical Control of Occupational Health), Ordinance No. 6734 of the Special Department of Social Security and Labor of March 9, 2020, and Service Order No. 608 of August 5, 1998, of the Ministry of Social Security.

The main purpose of the PCA is to standardize measures that promote, maintain, and prevent employees' hearing health. Benefit of the PCA for our employees:



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- Possibility of early intervention, if a possible occupational and non-occupational hearing loss is detected;
- Prevention of the development or aggravation of occupational hearing loss;
- Reduction of impacts related to exposure to intense noise, such as stress, nervousness, and lack of attention;
- Better performance in the performance of the role;
- Availability for the market, since a preserved hearing employee has better chances of being admitted to new companies and new positions;
- Mobility of being able to perform several roles within the same company;
- Maintaining health and improving quality of life.

The monitoring data for the year 2022 for the PCA demonstrates the condition of hearing stability of employees.

Respiratory Protection Program - PPR

ADATA manages the respiratory protection of the employees inherent to the inhalation of harmful air pollutants through the Respiratory Protection Program (PPR), in which its purpose is to provide guidance on the adequate methods of selection, use, and care of respiratory

designed to prevent the inhalation of harmful air pollutants.

The program was implemented in 2022, we conducted preliminary qualitative olfactory sensitivity tests in order to verify the ability to detect odors while the employee wears the protective mask. In addition, we also perform sealing tests, ensuring the masks' efficiency.

Ergonomic Management Committee

Ergonomic management is an integral part of the procedures related to the employee's health and safety at ADATA, fulfilling NR-17, impacting the minimization or neutralization of risks, and establishing a better relationship between the employee and their work environment. In line with this concept, in 2022 we created our Ergonomic Management Committee, inviting employees to represent the areas of the company, meeting monthly for the purpose of:

- Promoting strategies to encourage the participation of all employees in the practices of labor gymnastics.
- Supporting the organization of ergonomics trainings/dialogues.

- Supporting the performance of the Ergonomic Assessments Report.
- Supporting assessments and conducting ergonomic blitz in the areas.
- Generating notes related to ergonomics (key persons bring in the other employees).

The involvement of ADATA's senior management was essential for decision-making, generating significant positive impacts on the program's performance indices. In 2022, the committee created 07 actions, of which 02 have been successfully completed and 05 are under development.

Incidents and Accidents (GRI 403-2)

Accidents are classified into categories, considering the potential severity and/or severity of the injury, for the purpose of communicating the investigation, monitoring, and controlling the measures to be adopted. Our employees are trained so that any and all incidents or accidents must be reported immediately to the employee's immediate superior and to the EHS area (**GRI 403-2**).

Subsequently, the occurrence must be reported using the "Investigation Report" form, in which the deadline for issuance must



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be considered according to the degree of severity of the incident:

Degree	Severity Description	Investigation Report
A	Potentially serious accident that can cause permanent disability, death or mutilation, and/or considerable loss of structures, equipment, materials, or the environment.	Must be issued on the same day of its occurrence
B	Accident with the potential to cause serious injury or illness, which generates partial disability and/or temporary incapacity, or property damage of a destructive but not extensive nature, or damage to the environment.	Maximum deadline for issuance is 24 hours after the occurrence
C	Accident with the potential to cause minor injuries that do not result in leave/disability or restriction of work, minor illness, or minor damage to property or the environment.	Up to 48 hours after the occurrence

In strategic locations in the company, the EHS area makes available the incident record card, where employees can record the deviations found in near-misses in health and safety, as well as environmental accidents.

On a weekly basis, the EHS area collects the records made by the employees and, together with the area manager, assesses the improvement actions to avoid and/or eliminate such incidents.

All incident records are registered and treated as internal Non-Conformities in the "NC and Corrective Action Report" of each security technician, in this report, immediate action, corrective action, and assessment of the effectiveness of what was done are carried out.


In 2022, there was an occupational accident involving a direct employee of ADATA at the Manaus unit (MAO), of mild severity was recorded, with 02 days of work lost, in which a CAT was opened following the applicable laws. No accidents or incidents involving third parties, and no accidents that resulted in death or serious consequences **(GRI 403-9)**.

We follow up with all our employees and there are no diseases related to our activities, or occupational diseases **(GRI 403-10)** 100% of ADATA employees and outsourced professionals are covered by the EHS Management System **(GRI 403-8)**.

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- Emissions
- Waste
- Water and Effluents
- Energy

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Emissions (GRI 30)

One of the actions with the creation of our EHS management system in 2019 was atmospheric emissions management, where we started participating in the GHG Protocol Program, managed by FGV, it sets standards, guidelines, tools, and training to manage our emissions.

In the report referring to the 2021 results, both plants in Brazil evidenced information in the 3 scopes of the program and were verified by certified external body, with this, we obtained the NBR ISO 14064:2019 certification of our reports and consequently the Gold seal of the GHG Program, showing our effective commitment to the reduction of greenhouse gas emissions.

Strengthening our commitment to the GHG Program, in 2023 we will report the 2022 data following the schedule of the GHG Program of FGV, which is scheduled to be completed by August 2023. Deepening our impacts related to the transportation of our inputs and products.

We are also committed to beginning our participation in the CDP Program, which is

an international non-profit organization that encourages companies to mini in 2023 by also reporting data from 2022, a worldwide program with the same concept.

The 2022 emissions inventory is available at:

<https://registropublicodeemissoes.fgv.br/participantes/3699>

Waste (GRI 306-1 to 306-5)

ADATA's responsibility and commitment to managing the waste generated have always been very relevant aspects, as the environmental impacts of its incorrect disposal and/or destination are several.

Our waste management plan has as its criteria the identification of the waste generated in the process and its classification. From this data, we define the collection system, storage, transport, and final disposal.

Management of environmental permits applicable to waste generation is part of our EHS Management System. As we are a B2B (business to business) industry, which markets its products to other companies, we are not eligible for compliance with legislation related to

Reverse Logistics.

Our waste management encompasses the commitment of the entire company:

- The EHS (Environment, Health, and Safety) department is responsible for supervising, and training employees and third parties, filling out the monthly waste report, monitoring storage sites, and the environmentally adequate final disposal site.
- The EHS department establishes, with the support and approval of senior management, the goals for reduction, reuse, selective collection, and recycling, among others, with the purpose of reducing the amount of waste sent to final disposal.
- Our Purchasing department is responsible for the relationship with suppliers and buyers of waste (those destined for recycling).
- Our legal department provides support in the revision and treatment of contracts.
- Senior management is reported monthly on waste management through the presentation of indicators.

Our focus is always on non-generation, but when this is not possible, our goal is to send waste for recycling. A major milestone for ADATA in 2022 was

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developing partners for the disposal of our electronic waste and board burrs. Until 2021 this waste generated in our headquarters in the countryside of São Paulo was destined for incineration, today we are proud to inform you that we send 100% of this waste for recycling.

The search for this partner occurred through market research, it was approved through our EHS Management System guidelines, and our components and memory board fillets are de-characterized for reuse.

Our goal for 2023 is to send electronic components from the Manaus unit to recycling, following the same guidelines as those used at our headquarters.

Through market research, we have also developed a partner for recycling foams that are generated from imported packaging inputs, they are reused for the production of vehicle seats.

In 2022, a total of 35.22 tons of waste was generated at the Manaus unit and 23.80 tons at the Santo Antônio da Posse - SP unit **(GRI 306 a)**. We have meticulous control of all waste generated,

weighing it at the time of storage, recording the amount generated at the source **(GRI 306-1)**. With this, we ensure control of the amount of waste stored in our plant and the amount of waste disposed of. In 2022, all of our waste was sent for the correct final disposal, be it recycling, incineration, or landfill, as can be seen in the table below **(GRI 306-4)**.

It is worth mentioning that the organic waste from the SP unit is destined for municipal public collection and therefore, is not weighed. This waste corresponds almost exclusively to bathroom waste since there is no kitchen/dining room on site. All waste is generated in the organization's own activity.

To preserve the confidentiality of the production process, we present a brief summary of the inputs and raw material inflow, as well as the waste generation points on page 57 - **(GRI 306-1 a)**.



Type of Waste - 2022	SP (ton) - Destination		MANAUS (ton) - Destination	
Non Hazardous - Class II A Non Inert - Recyclable				
Paper/cardboard	5,7	Recycling	7,5	Recycling
Plastic	10,2	Recycling	2,3	Recycling
Metal	0,03	Recycling	-	-
Wood	-	-	4,9	Recycling
Subtotal	15,9	-	14,6	-
Non Hazardous - Class II A Non Inert - Not Recyclable				
Non-contaminated maintenance waste and *includes organic waste (toilet paper) from the MAO unit	1	Landfill	*4,8	Incineration
Non Hazardous - Class II A - Inert				
ETS sludge	0,2	Landfill	8,8	Incineration
Hazardous - Class I				
Miscellaneous contaminated materials	6	Incineration	8,1	Incineration
Electronic components	0,3	Recycling	0,32	Incineration
Board burrs	0,4	Recycling	n.a	-
Lamps	-	-	0,3	Incineration
Subtotal	6,7	-	8,4	-

Waste generated in 2022 at the Santo Antônio da Posse - SP and Manaus - AM units (GRI 306-3 and GRI 306-5)



Water and Effluents

(GRI 303-1 to 303-5)

The management of water and effluents at ADATA is an activity that contemplates the responsibility of planning and using our water resources in the most efficient way. We work continuously in our plants to ensure that the quality of the water in our basins and of the effluent destined to meet all applicable legal requirements, we use automated systems that are structured in order to ensure that the amount of water captured is within the legally established, in addition to mapping all processes involved to ensure the quality required in our processes. The implemented procedures support this efficient management and directions to the employees and technicians involved.

Water and effluent management is also part of our EHS metrics, and is included in our objectives and goals, as we set water consumption limits per production unit in São Paulo and Manaus.

Santo Antônio da Posse - SP unit

The water used in our units comes 100% from artesian wells, at the headquarters in

countryside of São Paulo we use it in our industrial process, in which we have strict quality controls, the treatment is carried out by reverse osmosis, thus guaranteeing the ideal level for our processes. Industrial effluents generated are also treated following all the quality standards established in the applicable legislation.

As part of our EHS objectives and goals, we determined that in 2022 the total monthly water consumption in correlation with the number of production units carried out would not exceed 3 Liters, in none of the months did we exceed this limit.

For 2023 the goal is that the total monthly water consumption in correlation with the unit produced does not exceed 2.5 Liters.

YEAR	2020	2021	2022
Total consumption in m³ of water	30.723	37.753	50.499
Limit of Liters of Water X Production Unit	5 L	5 L	3 L
Average Result in L X Production Unit	2,22 L	1,23 L	1,14 L

The effluents follow the same methodology, and in 2022 the total monthly destination of effluents in correlation to the number of total units produced did not exceed 3 Liters, in none of the months did we exceed this limit.

For 2023 the goal is that the total amount of effluents destined in correlation with the unit produced does not exceed 2.5 Liters.

YEAR	2020	2021	2022
Total disposal in m³ of treated effluent	18.218	21.250	27.636
Limit of Liters of Effluent X Production Unit	5 L	5 L	3 L
Average Result in L X Production Unit	2,22 L	1,22 L	1,17 L

Environmental Quality Control - Water and effluents

For water, we perform quarterly analyses in the two existing wells, evaluating process-related parameters. Regarding the effluent, we perform monthly bimonthly analyses of both the raw effluent and the treated effluent, in accordance with Decree 8.468 of September 8, 1976, and Conama Resolution 430 of May 13, 2011. In addition, we also carry out upstream and downstream analyses in the stream where we dispose of the treated effluent, following Decree 8.468 of September 08, 1976, Resolution and Conama No. 357 of March 17, 2005.

In 2022 we performed over 100 analyses of water and effluents, where only two were collected in order to meet two non-compliant parameters.

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Manaus Unit

In our branch, the water used is exclusively for human consumption, which is also collected from an artesian well, and its quality meets all the levels required by the applicable laws.

The methodology of EHS objectives and goals is extended to our branch, we determined that in 2022 the total monthly water consumption in correlation with the number of employees would not exceed 3m³, showing a great result in its first year of EHS metrics, in none of the months did we exceed this limit.

For 2023 the goal is that the total monthly water consumption in correlation with the number of employees does not exceed 2 m³.

YEAR	2022
Total consumption in m ³ of water	3,055
Monthly Consumption Limit in m3 of Water X Employee	3 m ³
Average Result in L X Employee	1,45 L

The effluents also follow the same methodology, and in 2022 the total monthly destination of effluents in correlation to the total number of employees would not

exceed 3 m³, only in the first 02 months of the year, the goal was compromised by corrective and preventive maintenance in our Effluent Treatment Station (ETE).

For 2023 the goal is that the total amount of effluents destined with the number of employees does not exceed 2 m³.

YEAR	2022
Total disposal in m ³ of treated effluent	2,596,95
Monthly Generation Limit in m3 of Effluent X Employee	3 m ³
Average Result in L X Employee	1,70 L

Environmental Quality Control - Water and effluents

For drinking water, we perform monthly analyses at 3 points, according to the Consolidation Ordinance of the Ministry of Health of September 28, 2017 - amended by MS Ordinance 888 of May 04, 2021. In our artesian well, the analysis is bimonthly, when samples are collected and analyzed according to the potability standard of the Potability Ordinance and by Resolution No. 001/2016 of CERH.

With regard to the effluent, we carry out bimonthly analyses of both the raw effluent and the treated effluent, under Conama Resolution No. 357 of March 17, 2005, Conama Resolution 430 of May 13, 2011, and Resolution No. 001/2016 of CERH. In 2022, we performed about 90 analyses of water and effluents and all the results met the legislation mentioned.



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Energy **(GRI 3-3, 302)**

Energy consumption is a major impact perceived by the company's stakeholders and senior management. In this context, ADATA carries out a series of actions to mitigate the impacts caused by energy consumption, through actions of rational use and clean energy acquisitions, which we have been using since 2021. Aiming to evidence and assure to our stakeholders the consumption of 100% renewable energy, our energy management contracts were established for the consumption of energy from incentivized sources, which is a type of energy from renewable sources that generate less environmental impact. To evidence this process, in 2022 we acquired I-REC (International Renewable Energy Certificate) certificates, recognized worldwide, which prove that the energy consumed in our units in Brazil during the year 2022 is 100% renewable.

We monitor electricity consumption through consumption indicators per product unit, which defines energy intensity, GRI 302-3 indicator. Energy values from fossil fuels are not computed in the indicator. The monitoring of this energy consumption is monthly:

Headquarters in Santo Antônio de Posse

YEAR	2020	2021	2022
Total Energy Consumption in Mwh	5.201.489	5.902.650	6.454.856
Limit of Liters of Water X Production Unit	1,6	1,6	1,6
Average Result in L X Production Unit	0,60	0,29	0,26

In the last 3 years we have had an increase in total energy consumption, however in relation to the goals we have decreased the factor "energy consumed VS unit produced", this is justified by the fact that we have increased our results of finished products, optimizing our production processes and using the machines and equipment according to their respective capacities.

Manaus Branch

YEAR	2022
Total Energy Consumption in Mwh	2.518.269
Limit of Liters of Water X Production Unit	2
Average Result in L X Production Unit	0,78

The energy values considered are only those for internal company use. (GRI 302-3)

In line with market expectations, the evolution of maturity, and continuous improvement of our EHS Management System, we have committed that in the 2023 GHG (Greenhouse Gases) Program report that will be based on emissions generated in 2022, which is under development, we will report our impacts related to the transportation of raw materials and finished products.

The average annual energy intensity (considering electricity as a parameter) of the SP unit is 0.26 MWh/unit produced. In the MAO unit, it is 0.78 MWh/unit produced.





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There is still energy consumption from the use of renewable and non-renewable fuels in the use of vehicles for transporting people, not included in the intensity indicator. One of our objectives during 2023 is to make the transition from gasoline consumption to ethanol for all vehicles in the company's fleet. Outside the organization, we still follow up on measuring the fuel consumption for the officers' air travel. These values are not part of the indicators reported in the year 2022.

Total Electric Energy consumption - SP unit


6.454.856 MWh


Total Electric Energy consumption - MAO unit

2.518.269 MWh

(GRI 302-1)

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION		
			OMITTED REQUIREMENTS	REASON	
GRI 2: General Disclosures 2021	2-1 Organizational Details	03, 06, 10, 11, 15, 16			
	2-2 Entities included in the organization's sustainability reporting	06, 15			
	2-3 Reporting period, frequency and contact point	06			
	2-4 Restatements of information	06			
	2-5 External assurance	06, 24			
	2-6 Activities, value chain and other business relationships	11, 16, 17			
	2-7 Employees	10, 20, 33 a 43			
	2-8 Workers who are not employees	37, 38, 40			
	2-9 Governance structure and composition	19, 30, 32			
	2-10 Nomination and selection of the highest governance body	19, 33			
	2-11 Chair of the highest governance body	20, 34			
	2-12 Role of the highest governance body in overseeing the management of impacts	19, 20, 21			
	2-13 Delegation of responsibility for managing impacts	21, 26			
	2-14 Role of the highest governance body in sustainability reporting	24			
	2-15 Conflicts of interest	30			
	2-16 Communication of critical concerns	19, 23, 35			
	2-17 Collective knowledge of the highest governance body	21, 24			



GRI Report

GRI STANDARD	DISCLOSURE	LOCATION	OMISSION		
			OMITTED REQUIREMENTS	REASON	EXPLANATION
GRI 2: General Disclosures 202	2-18 Evaluation of the performance of the highest governance body	24			
	2-19 Remuneration policies		2-19	Confidentiality restrictions	Confidential data
	2-20 Process to determine remuneration		2-20	Confidentiality restrictions	Confidential data
	2-21 Annual total compensation ratio		2-21	Confidentiality restrictions	Confidential data
	2-22 Statement on sustainable development strategy	8			
	2-23 Policy commitments	20, 25, 31			
	2-24 Embedding policy commitments	30, 31			
	2-25 Processes to remediate negative impacts	26 a 28, 35, 36			
	2-26 Mechanisms for seeking advice and raising concerns	33			
	2-27 Compliance with laws and regulations	25			
	2-28 Membership associations	16			
	2-29 Approach to stakeholder engagement	33, 34			
	2-30 Collective bargaining agreements	39			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	26 a 28, 35, 36			
	3-2 List of material topics	26			
	3-3 Management of material topics	26 a 28, 35, 36			



GRI Report

GRI STANDARD	DISCLOSURE	LOCATION	OMISSION		
			OMITTED REQUIREMENTS	REASON	EXPLANATION
GRI 302: Energy 2016	302-1 Energy consumption within the organization	61			
	302-2 Energy consumption outside of the organization		302-2	Unavailable/incomplete information	Consumption data outside the organization was not used in the reporting period
	302-3 Energy intensity	60			
	302-4 Reduction of energy consumption	60			
	302-5 Reductions in energy requirements of products and services	60			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	58			
	303-2 Management of water discharge-related impacts	58			
	303-3 Water withdrawal	59			
	303-4 Water discharge	59			
	303-5 Water consumption	59			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	55			
	305-2 Energy indirect (Scope 2) GHG emissions	55			
	305-3 Other indirect (Scope 3) GHG emissions	55			
	305-4 GHG emissions intensity	55			
	305-5 Reduction of GHG emissions	55			
	305-6 Emissions of ozone-depleting substances (ODS)	55			
	305-7 Nitrogen oxides (Nox), sulfur oxides (SOx), and other significant air emissions	55			

GRI STANDARD	DISCLOSURE	LOCATION	OMISSION		
			OMITTED REQUIREMENTS	REASON	EXPLANATION
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	55 a 57			
	306-2 Management of significant waste-related impacts	55 a 57			
	306-3 Waste generated	55 a 57			
	306-4 Waste diverted from disposal	55 a 57			
	306-5 Waste directed to disposal	55 a 57			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	41			
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	42			
	401-3 Parental leave	43			
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	44			

DISCLOSURE	LOCATION		OMISSION		
			OMITTED REQUIREMENTS	REASON	EXPLANATION
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	49			
	403-2 Hazard identification, risk assessment, and incident investigation	39, 51, 52			
	403-3 Occupational health services	49			
	403-4 Worker participation, consultation, and communication on occupational health and safety	51, 52			
	403-5 Worker training on occupational health and safety	49, 51, 52			
	403-6 Promotion of worker health	45			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	49			
	403-8 Workers covered by an occupational health and safety management system	53			
	403-9 Work-related injuries	53			
	403-10 Work-related ill health	53			



ASSURANCE STATEMENT



STATEMENT BY SGS DO BRASIL LTDA. (SGS) REGARDING THE SUSTAINABILITY ACTIVITIES PROVIDED IN “INTEGRATED REPORT 2022” FROM ADATA TECHNOLOGY BRAZIL

NATURE AND SCOPE OF ASSURANCE

The SGS was hired by ADATA TECHNOLOGY BRAZIL to carry out the third-party assurance of its Integrated Report, which provides information for the year 2022 and that follows international guidelines for monitoring and reporting sustainability information, including the Global Reporting Initiative (GRI). The scope of assurance, based on the methodology for assurance sustainability reports from SGS, included the text and data related to GRI Standards 2021, current version of GRI.

The information provided in “INTEGRATED REPORT 2022” and its presentation is a sole responsibility of ADATA TECHNOLOGY BRAZIL management structure. The SGS is not involved in the preparation of any material, including the in the said report, such as risk analysis, materiality tests and other critical issues that may affect severally the ADATA TECHNOLOGY BRAZIL business. We are liable for giving our opinion of the GRI disclosures and their texting, data, charts, and statement within the assurance scope in order to keep the ADATA TECHNOLOGY BRAZIL stakeholders informed.

The SGS Group has developed a set of assurance protocols for Sustainability Communication based on the best practices provided in GRI Sustainability Reporting Standards, in its most up-to-date version of 2021, and the assurance standard **International Standard on Assurance Engagements - ISAE3000**. Such protocols offer different assurance levels depending on context and capacity of organization.

This report was assured considering our protocols to assess the content authenticity and its alignment with the requirements of GRI Sustainability Reporting Standards 2021, Universal Standards (*GRI 1_ Foundation 2021, GRI 2_ General Disclosures 2021, GRI 3_ Material Topics 2021*) and the requirements of Topic Standards (GRI 200, GRI 300 and GRI 400) according to the material topics identified by ADATA TECHNOLOGY BRAZIL through the process described in this report.

The assurance process comprised (i) interviews with strategic employees involved in the process of compilation and preparation of the report, where disclosures, data and processes related to sustainability management and the collection of GRI disclosures were reviewed, (ii) review of the documentation presented by ADATA TECHNOLOGY BRAZIL and comparison with the information entered by the company in the report and (iii) evaluation of versions of this report for alignment with GRI standards and (iv) analysis of engagement activities with defined parties (stakeholders) and assessment of the form of sustainability as defined materials were and inserted in the context of the organization and in the content of this sustainability report. The accounting information of ADATA TECHNOLOGY BRAZIL contained and referenced in the “INTEGRATED REPORT 2022” was not evaluated as part of this assurance process, but in a separate audit process. The information related to the inventory of greenhouse gases was not included in this audit process.

IMPARTIALITY AND COMPETENCE STATEMENT

The SGS Group is global lead in inspection, analysis and verifications services, operating in more than 140 countries and rendering services that includes management system certification, audits and trainings on quality, environmental, social and ethic segments, sustainability assurance reports and greenhouse gases verification. The SGS attests your independence against ADATA TECHNOLOGY



ASSURANCE STATEMENT



BRAZIL stating that is exempt from interest conflict with the organization, to their subsidiary and stakeholders.

The assurance team was composed according to members' expertise, experience and competence for this activity, the team is composed of:

- An Audit Lead on Assurance of Sustainability Report, a Lead auditor on Socioenvironmental programs, Lead Auditor in Integrated Management Systems, Lead Assessor of Greenhouse Gases (GHG) and Lead auditor on Renovabio program.

ASSURANCE OPINION

Regarding the verification carried out in the methodology, processes and data presented by ADATA TECHNOLOGY BRAZIL, we are confident that the information and data contained in the "INTEGRATED REPORT 2022" are reliable and a balanced representation of the sustainability activities developed by ADATA TECHNOLOGY BRAZIL in the base year 2022. The SGS has the opinion that the report can be used by the company's stakeholders as part of its company evaluation processes.

In our opinion, based on what was verified and on the materials presented by ADATA TECHNOLOGY BRAZIL, the content of the report fully meets the requirements of the GRI Standards, which are: apply the reporting principles, report the disclosures in GRI 2: General Disclosures 2021, determine material topics, report the disclosures in GRI 3: Material Topics 2021, report disclosures from the GRI Topic Standards for each material topic, provide reasons for omission for disclosures and requirements that the organization cannot comply with, publish a GRI content index, provide a statement of use and after publication notify GRI.

RECOMMENDATIONS, FINDINGS AND CONCLUSIONS OF ASSURANCE

- ADATA TECHNOLOGY BRAZIL presents its first Sustainability Report in 2022 with 5 material themes: Water, Energy, Employment, Waste and Health and Safety. The consolidation of these material themes led to a selection of GRI disclosures for the preparation of the report, as well as serving as the basis for presenting the information and data contained in the "2022 SUSTAINABILITY REPORT". In our understanding, the themes resulting from the study represent a first look at the impacts of the activities of ADATA TECHNOLOGY BRAZIL, the materiality was defined based on the impacts of the ISO14001 standard and validated with a small range of stakeholders. Overall, the report covers information on topics considered to be material for ADATA TECHNOLOGY BRAZIL and interested parties.
- As an opportunity for improvement and greater robustness in the presentation of information, we understand that the material themes need to be defined not only by analyzing the impacts defined in ISO14001, but in a more strategic way, including sectoral themes, and strategic issues of the company, also passing through a diverse range of stakeholders, which includes specialists, as guided in the GRI 3.
- There are opportunities for improvements in the management of material topics by A ADATA TECHNOLOGY BRAZIL and in the definition of compliance with internal policies for more detailed and structured reporting of the 5 material topics.



ASSURANCE STATEMENT



- Regarding the partial reporting of the indicators, we identified the need to complement the information for the next cycle on the following disclosures: 2.17 - Collective knowledge of the highest governance body, 2-23 Policy commitments, 2-24 Embedding policy commitments, 2-29 Approach to stakeholder engagement and 302-1 Energy consumption within the organization.
- We understand that due to the level of maturity with the theme, the 2022 report is the first big step towards the evolution of the internal structure and discussions with the stakeholders for the next report.

Finally, SGS believes in the importance of transparency and congratulates the company for the initiative of ensuring its report, as well as promoting sustainability in its actions and disseminating its code of conduct and compliance at all levels of the organization.

April 06, 2023

Executed by and on behalf of SGS.

A handwritten signature in black ink, appearing to read "Gustavo Venda".

Gustavo Venda
Business Manager - Sustainability

A handwritten signature in black ink, appearing to read "Juliana Fullmann".

Juliana Fullmann Ishibachi
Lead Auditor for Sustainability Report