

Sustainability & ESG Policy



Your Partner for IT Security & Compliance

Valeri Milke

Datum: 14.08.2026

Document History

Version	Date	Type of Activity	Author	Approver
0.1	14.08.2026	Initial Creation	VamiSec EMS Team	–
1.0	14.08.2026	Draft consolidated for management approval	VamiSec EMS Team	–
1.0	15.08.2026	Approval completed (EMS lead responsibility assigned)	–	Lilia Dorofeeva

Document Information

Document Owner	Valeri Milke
Document Classification	Public (TLP:GREEN)
Author(s)	VamiSec EMS Team
Version	1.0
Status	Final

1. Introduction

1.1. Purpose of the Policy

This policy defines the sustainability and ESG (Environmental, Social, Governance) commitments of VamiSec GmbH (Bornheimer Straße 127, 53119 Bonn, Germany). As a specialised information security and compliance consultancy, VamiSec is committed to conducting its business in a manner that is environmentally responsible, socially fair and ethically sound.

1.2. Scope

This policy applies to VamiSec GmbH as a legal entity, to all employees, working students and – where contractually agreed – to freelancers and subcontractors acting on behalf of VamiSec. It covers all business activities, including consulting delivery at client sites, remote work and internal operations.

1.3. Compliance with Normative and Regulatory Requirements

VamiSec commits to complying with all applicable environmental, labour, human rights, anti-corruption and data protection laws, in particular the German Arbeitsschutzgesetz, the Allgemeines Gleichbehandlungsgesetz (AGG), the EU GDPR and applicable environmental legislation. This policy is aligned with the principles of ISO 26000, the UN Global Compact, the ILO Core Labour Standards and the OECD Guidelines for Multinational Enterprises, and it complements the existing VamiSec ISMS (aligned with ISO/IEC 27001).

2. Commitments and Quantitative Objectives

VamiSec commits to the following overarching sustainability objectives:

- **Environment:** reduce CO₂ emissions per employee by 30 % by end of 2028 (baseline year 2026) and procure 100 % renewable electricity for own office space by end of 2027.
- **People:** provide at least 40 hours of professional training per employee per year, maintain zero tolerance for discrimination and harassment, and maintain zero recordable work accidents.
- **Ethics:** maintain 100 % completion of annual ethics and information security awareness training and zero corruption incidents.
- **Supply chain:** obtain acceptance of the VamiSec Supplier Code of Conduct from 100 % of core suppliers and subcontractors by end of 2027.

The quantitative targets in this policy are reviewed at least annually as part of the management review and adjusted where necessary.

3. Management System and Responsibilities

- The Managing Director (Geschäftsführer) owns this policy, provides the necessary resources and reviews sustainability performance at least annually as part of the management review.
- Detailed requirements are defined in the subordinate policies: Environmental Management Policy, Travel & Mobility Policy, Labor & Human Rights Policy, Code of Conduct & Anti-Corruption Policy, Whistleblowing & Grievance Policy and the Supplier Code of Conduct.
- Key figures (energy, CO₂, training, staff and supplier KPIs) are recorded in the corresponding KPI reports and evaluated annually.
- All employees are informed of this policy during onboarding and via the internal document repository; the policy is published on the VamiSec website.

4. Review and Continuous Improvement

This policy is reviewed at least annually and upon significant changes to the business, applying the same continuous improvement cycle (PDCA) that governs the VamiSec ISMS. Findings, incidents and stakeholder feedback are used to improve the sustainability management system.