

Environmental Sustainability Policy

DRAFT FOR MANAGEMENT APPROVAL

Document field	Detail
Organisation	UNILINK Education
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Policy owner	Director
Approval date	Pending management approval
Effective date	Pending management approval
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DRAFT FOR MANAGEMENT APPROVAL - This document is not yet in force and must not be represented as an adopted policy until it has been approved and assigned an effective date.

1. Purpose

UNILINK Education recognises that its office operations, digital services, technology procurement, business travel and supply chain have environmental impacts. This policy establishes a proportionate framework to identify those impacts, improve operational practices, build reliable greenhouse gas data and communicate progress accurately.

The policy supports continuous improvement. It does not state or imply that UNILINK is carbon neutral, net zero, climate positive, independently certified or already operating without environmental impact.

2. Scope

This policy is intended to apply, once approved, to the operations carried on by:

- UNILINK EDUCATION PTY. LTD. (ABN 50 152 187 650), including the Sydney office at 16/650 George Street, Sydney NSW 2000, Australia.
- 盘否教育科技 (北京) 有限公司 / UNILINK Education Technology (Beijing) Co., Ltd. (USCC 91110105MA01M1Y31U), including the operating office at 1401, East Tower, Powerlong One, No. 1585 Lvling Road, Siming District, Xiamen, Fujian 361000, P.R. China.
- Employees, contractors and operational leads working for the above entities, including remote and digitally delivered services.

The policy covers office energy and resources, purchased technology and cloud services, business travel, procurement, waste and electronic waste, staff awareness, environmental data and public environmental claims. It does not automatically apply to any other legal entity unless that entity formally adopts it.

3. Principles

UNILINK will apply the following principles:

- Compliance: comply with applicable environmental laws, regulations, contractual requirements and lawful information requests in each jurisdiction of operation.
- Proportionality: focus first on the material impacts of a digitally delivered professional-services business.
- Evidence: retain reasonable supporting records for material environmental data, decisions and public statements.
- Transparency: distinguish measured results from estimates, plans and aspirations, and disclose material limitations.
- Continuous improvement: review priorities as data quality and operational understanding improve.
- Collaboration: engage constructively with clients, education partners, landlords and material suppliers on relevant environmental initiatives and training.

4. Environmental commitments

4.1 Energy and office operations

UNILINK will seek to reduce avoidable energy and resource use in its Sydney and Xiamen offices. Practical measures may include energy-saving device settings, switching off equipment when not required, favouring efficient replacement equipment, using building information where available and considering energy performance when selecting future premises or office services.

Where an office is leased and separately metered utility data is unavailable, UNILINK will seek landlord data or use a documented and reasonable allocation method. Estimates will be identified as estimates.

4.2 Digital services, AI and cloud infrastructure

UNILINK's services are primarily delivered online and increasingly use AI and cloud infrastructure. UNILINK will maintain a register of material technology and cloud suppliers, seek supplier environmental information where reasonably available, avoid unnecessary duplication of data or compute-intensive workloads, review resource settings and retain equipment for its useful life where security and performance permit.

UNILINK will not claim that digital delivery is impact-free. Any statement about the environmental benefit of online delivery must be specific, qualified and supported by evidence.

4.3 Business travel

UNILINK will record business travel booked or reimbursed by the covered entities. Before travel is approved, teams should consider whether a remote meeting can achieve the business purpose without materially reducing service quality, compliance or relationship management.

Necessary travel, including travel between China and Australia, may continue. The purpose of this commitment is to improve visibility and decision-making, not to impose an unsupported travel-reduction claim.

4.4 Paper, materials and waste

UNILINK will use electronic records and signatures where lawful, secure and operationally appropriate. Printing should be limited to legal, regulatory, accessibility or genuine operational needs. Office purchasing should favour durable, repairable and reusable products where practical.

Electronic equipment will be reused, securely redeployed, donated or recycled through an appropriate provider where reasonably available. Disposal records will be retained for centrally managed electronic waste. General waste and packaging should be reduced and separated for recycling where building facilities permit.

4.5 Responsible procurement

Environmental considerations will be included in material purchasing decisions where relevant. This may include product durability, energy efficiency, packaging, reparability, supplier information, delivery consolidation and end-of-life arrangements.

UNILINK will prioritise the highest-value or highest-impact suppliers for environmental information requests rather than applying an unnecessarily complex process to every low-value purchase.

4.6 Staff awareness and participation

Operational leads will communicate this policy and the action plan to relevant staff. UNILINK will participate in reasonable environmental training offered by major institutional partners where it is relevant to the services provided and will use lessons from that training to improve internal practices.

5. Greenhouse gas measurement

UNILINK intends to establish its first proportionate operational greenhouse gas baseline for FY2026/27, covering 1 July 2026 to 30 June 2027, subject to data availability and management review.

The initial inventory will be designed with reference to the GHG Protocol Corporate Standard and will seek to cover:

- Scope 1: direct emissions from sources owned or controlled by the covered entities, if any, including controlled fuel use and relevant refrigerant leakage where reliable data exists.
- Scope 2: indirect emissions from purchased electricity or other purchased energy used in the Sydney and Xiamen operations.
- Material Scope 3 categories: business travel, employee commuting where reliable data can be obtained, purchased IT and cloud services, material office goods and equipment, and waste generated in operations.

The inventory will identify the organisational boundary, reporting period, data sources, emission factors, estimation methods, exclusions, uncertainty and review status. Australian calculations will use current official Australian factors where applicable. China calculations will use current official Chinese factors suited to the relevant accounting purpose. Factors will be reviewed before each reporting cycle.

6. Targets and environmental claims

UNILINK has not yet adopted a quantitative greenhouse gas emissions-reduction target. A target will be considered only after the first baseline has been completed, data quality has been assessed, material emission sources have been identified and management has approved a practical reduction pathway.

Until those steps are complete, UNILINK will not claim to have a science-based target, a net-zero target, carbon-neutral operations or third-party environmental certification. Any future target will state its base year, boundary, covered scopes, target year, calculation method and material exclusions.

Public environmental statements must be accurate, specific and capable of substantiation. Plans and aspirations must be identified as future commitments, supported by reasonable grounds and accompanied by relevant qualifications or limitations.

7. Governance and responsibilities

- Director: approves the policy, is accountable for implementation and approves any future quantitative target or public emissions report.
- Designated operational leads: coordinate data collection for Sydney and China operations, maintain evidence and report material gaps or incidents.
- Finance and administration personnel: retain relevant invoices, travel records, procurement records and supplier information.
- All staff and contractors: follow reasonable environmental procedures relevant to their work and report practical improvement opportunities.

No staff member may publish a carbon-neutral, net-zero, certified, emissions-reduction or similar environmental claim on behalf of UNILINK without evidence and management approval.

8. Monitoring, reporting and review

Progress against the Environmental Action and Emissions Management Plan will be reviewed at least annually. The review will consider data completeness, material impacts, completed actions, unresolved gaps, stakeholder requirements and whether a quantitative target is ready for adoption.

UNILINK may publish a proportionate progress update after the first baseline review. Any public update will distinguish verified data, estimates and incomplete categories. Supporting records will be retained for a reasonable period and for longer where required by law or contract.

This policy will be reviewed within 12 months of its effective date and thereafter at least annually, or earlier if there is a material change to operations, legal obligations or environmental claims.

9. Questions and concerns

Questions, improvement suggestions or concerns relating to this policy may be sent to enquiry@unilink.co. Material concerns will be escalated to the Director or the designated operational lead for review and documented response.

10. Approval

Approval field	Detail
Approved by	Pending
Position	Director
Signature	Pending
Approval date	Pending
Effective date	Pending

References

- UNSW Supplier Charter: <https://www.unsw.edu.au/content/dam/pdfs/unsw-adobe-websites/divisions/unsw-finance/2024-09-unsw-supplier-charter-2024.pdf>
- ACCC, A guide to making environmental claims for business:
<https://www.accc.gov.au/about-us/publications/a-guide-to-making-environmental-claims-for-business>
- GHG Protocol, Standards and Guidance: <https://ghgprotocol.org/standards-guidance>
- Australian Government, National Greenhouse Accounts Factors 2025:
<https://www.dcceew.gov.au/climate-change/publications/national-greenhouse-accounts-factors-2025>
- China Ministry of Ecology and Environment and National Bureau of Statistics, 2023 electricity CO2 emission factors:
https://www.mee.gov.cn/xgk/xxgk01/202512/t20251231_1139517.html