

Environmental Sustainability Policy

APPROVED AND EFFECTIVE

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Approved by Baining Wu, Director. Effective 1 August 2026. No quantitative emissions-reduction target, completed greenhouse-gas inventory, environmental certification or independent assurance is claimed.

1. Purpose

UNILINK Education is a digitally delivered professional-services business. It does not operate manufacturing facilities, industrial equipment or a transport fleet, so its direct operational emissions are expected to be limited. Its principal relevant environmental impacts arise from purchased office electricity, business travel, cloud and AI services, technology equipment, procurement and waste. This policy establishes a proportionate framework for managing those impacts, improving operating practices and communicating 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 applies to the operations carried on by:

- UNILINK EDUCATION PTY. LTD. (ABN 50 152 187 650) and its operations in Australia.
- 盘否教育科技 (北京) 有限公司 / Panfou Education Technology (Beijing) Co., Ltd. (USCC 91110105MA01M1Y31U) and its operations in 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, landlords and material suppliers on relevant environmental initiatives.

4. Environmental commitments

4.1 Energy and office operations

UNILINK will seek to reduce avoidable energy and resource use in its Australia and China operations. 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 use relevant professional guidance and practical lessons from clients, suppliers and industry sources 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 Australia and China 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.
- ESG Owner - Baining Wu: maintains the governance framework, evidence and risk records, coordinates review and reports material matters to the Director.
- Australia Operations Lead - Mavis Xiaomao Wang: coordinates Australia records, data collection and first-line escalation.
- China Operations Lead - Baining Wu: coordinates China records, data collection and first-line escalation.
- 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 and improvement suggestions may be sent to enquiry@unilink.co. A confidential environmental, ESG or whistleblowing concern may be sent to ben@unilink.co with the subject "Confidential ESG concern". Information will be restricted to people who need it, good-faith reporting is protected from retaliation, and material concerns will be reviewed and documented.

10. Approval

Approval field	Detail
Approved by	Baining Wu
Position	Director
Signature	Not included in this published copy
Approval date	1 August 2026
Effective date	1 August 2026

References

- 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/xxgk/xxgk/xxgk01/202512/t20251231_1139517.html