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Environmental Sustainability Policy

Kyndryl strives to be a leader in sustainability in all of its business activities, products, and services. Kyndryl will ensure a sustainable and inclusive culture to drive positive impact at scale, while managing our impact on climate change by reducing our environmental impact and achieving net zero emissions.

This policy applies to all Kyndryl operations and employees, wherever they are carrying out work for and on behalf of Kyndryl.

Our goal is to protect the environment, implement pollution prevention practices, be a responsible user of energy and natural resources, and continually improve our environmental and energy efficiency by setting improvement objectives and providing the resources required to achieve them. We work with our stakeholders, partners, suppliers, and customers to implement and co-create systems that support these same goals. Kyndryl's environmental priorities and objectives are aligned with the leading scientific frameworks and scientific recommendations of the United Nations Intergovernmental Panel on Climate Change.

To achieve this, we focus on the following environmental priorities and objectives:

Restless to continuously anticipate, learn, and innovate: Integrate sustainability into Kyndryl's core business strategy. Utilize Kyndryl's services and expertise to work with customers to innovate, design, and continuously improve solutions that help them manage and reduce their environmental, climate, and energy impacts.

Empathetic to serve with trust and transparency: Meet or exceed all applicable regulatory requirements where Kyndryl does business, voluntary commitments to which Kyndryl subscribes, and other business requirements. Conduct periodic assessments of Kyndryl's compliance with this policy and our related management systems and annual review of this policy. Report and communicate transparently to all stakeholders on our performance, progress, and concerns.

Devoted to shared success: Engage with suppliers to ensure Kyndryl is procuring and delivering products and/or services that can reduce our environmental impact, are sustainable and energy efficient, and can be reused, recycled, or disposed of in an environmentally sound manner. Be environmentally responsible, acting promptly and responsibly to correct incidents or conditions that negatively impact the environment.

Create awareness amongst employees of Kyndryl's sustainability objectives, offer opportunities to collaborate on our sustainability journey, and ensure that personnel are properly trained and educated for their roles and responsibilities.

Conserve natural resources wherever possible and minimize waste generation. Improve effective use of water in Kyndryl's operations, especially focusing on locations in water stressed areas. Explore opportunities and partnerships to reuse

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wastewater and recover waste heat. Conserve and improve biodiversity in Kyndryl's areas of operation and the surrounding communities.

Track, measure, and monitor Kyndryl's greenhouse gas emissions and make continuous improvements to Kyndryl's environmental performance to achieve net zero by 2040. Reduce Kyndryl's greenhouse gas emissions by investing in energy efficiency projects, improving efficient use of our IT equipment, increasing the use of renewable energy in our operations, and engaging our suppliers and employees.

This policy is based on sound science, business judgement and the Kyndryl Way which will continue to be our guideposts as we track the evolving requirements and industry trends around environmental sustainability. Managing our environmental risks and communicating our progress is a critical component of our business success. The aligning of Kyndryl's environmental commitments with our business strategy is fundamental to ensuring that we will have responsible growth today and for the future.

Original signed April 2023 by:

MARTIN SCHROETER
Chairman of the Board and Chief Executive Officer