

# Environment Social & Governance Policy

The Belfield Group is committed to operating as a socially responsible business in everything that we do. Accordingly, this policy sets our approach to managing our business activities that ensures we consider the social, ethical, and environmental effects in a way that brings value to all our stakeholders (including employees, customers, shareholders, suppliers, local communities and global society) and produces an overall positive impact on society and our planet. Our ESG work is aligned with the following UN Sustainable Development Goals (SDGs):



To achieve this, we will operate by:

- Conducting business in a socially responsible and ethical manner
- Recognising, respecting, and protecting human rights
- Treating employees fairly, equitably and with respect
- Being responsible for our impact on the environment, including climate change
- Respecting and supporting the communities in which we work

The effectiveness of this Policy will be monitored and reviewed at least annually, to ensure the Groups continuing compliance with any relevant legislation and that identified improvement opportunities have been addressed as well as new business requirements met.

Recognising that corporate responsibility is an evolving subject area, with new issues emerging, then our focus will be on continuous improvement and full transparency.

## Responsible and Ethical Trading

We are committed to maintaining the highest standards within our supply chain(s). Our teams and independent providers make visits to suppliers to conduct compliance audits for quality and review adherence to our ethical trading requirements. We oppose the exploitation of workers, and we will not tolerate forced labour, or labour which involves physical, verbal, or psychological harassment, or intimidation of any kind. We will not accept human trafficking or the exploitation of children and young people in our business and undertake all reasonable and practical steps to ensure that these standards are maintained.

## Human Rights

We are committed to respecting internationally recognised human rights and the principles and guidance in the United Nations (UN) Guiding Principles on Business and Human Rights. Our Human Rights Policy is informed by

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the International Bill of Human Rights (as enacted in national laws around the world), the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work.

## Employee Relations

We ensure that all employees are treated fairly and with dignity and respect and aim to reward our employees fairly and support them in reaching their full potential. We are committed to promoting a positive health and safety culture throughout our business and have continued to invest in training and in improving our processes and practices to ensure that we operate safe and secure workplaces.

We are committed to providing safe and healthy working environments for all employees and will not compromise the health and safety of any individual. Belfield Group applies fair labour practices, whilst respecting the national and local laws of the countries and communities where we operate. We are committed to providing equal opportunity in all aspects of employment. We will build a diverse and inclusive team and will not engage in or tolerate any unlawful workplace conduct, including discrimination, intimidation, or harassment.

We are AB Members of SEDEX and are committed to ensuring our sites and Tier 1 suppliers are independently SMETA audited, in line with the Ethical Trade Initiative Base Code.

## Environment & Climate Change

We recognise that our business activities have varying direct and indirect impacts on the society and environment in which we operate. We control our impact on the environment by continually looking for ways to use energy, materials, and other resources more efficiently.

We have mapped our baseline carbon emissions footprint, in partnership with Greenly (a CDP Accredited Provider). Based on this, we are currently developing our Climate Change Road Map, with reduction targets for our journey to Net Zero.

We have continued to invest in new technologies with investment in energy efficiency at our sites. We are also extending our energy monitoring technologies, as we cannot manage what we cannot measure. Efficient waste management remains an important objective for the Group. All of our sites send Zero Waste to Landfill.

All staff are encouraged to play a role in reducing unnecessary energy, water and materials consumption and finding innovative solutions, to ensure our business and our products become more sustainable.

## Governance

We have set up the ESG Council to proactively manage our environmental and sustainability governance across the Group, this is chaired by our CEO. We also have an active Health & Safety Council, a Health and Well-Being

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Council and a Circular Products Working Group, all focusing on driving improvement. We are committed to reporting transparently on our progress.

### Communities

We recognise that we do not operate in isolation and it is important that we support our local communities. Our work involves:

- Encouraging volunteer work in community activities
- Supporting local schools with work experience programmes
- Supporting local fund-raising activities

In addition, we support several local and national charities that reflect our commitment to helping make real improvements to the quality of life of other people.

The Belfield Group Board has overall responsibility for the implementation of this policy.

Managing Directors of each business are responsible for establishing appropriate ESG responsibilities within their operations.

Signed on behalf of Belfield Group



Tom Prestwich  
Group Managing Director