

# Environmental, Social & Governance Policy

## Introduction

Celerity is committed to integrating ESG principles across its operations to promote sustainability, ethical conduct, and responsible governance. This policy outlines our approach to environmental stewardship, social responsibility, and corporate governance, in alignment with UK legislation and global best practices.

## Environmental Policy

### Legal Compliance and Standards

We comply with all applicable UK environmental laws and regulations, including:

- Environment Act 2021.
- Climate Change Act 2008.
- Streamlined Energy and Carbon Reporting (SECR).
- Energy Savings Opportunity Scheme (ESOS).

Our reporting aligns with:

- UK Sustainability Reporting Standards (UK SRS).
- IFRS S1/S2.
- Task Force on Climate-related Financial Disclosures (TCFD).

In addition:

- We are committed to sustainable practices and maintain continuous certification to ISO 14001:2015.
- We continuously monitor environmental regulations against our aspects and impacts, to ensure compliance and transparency.
- Where required, we comply with sector-specific regulations and client codes of conduct.

### Sustainability and Climate Action

We are committed to achieving Net Zero emissions by 2050. Our sustainability strategy includes:

- Measuring and reporting our carbon footprint annually to establish baselines and set science-based reduction targets.
- Implementing energy-efficient technologies and reducing operational waste.
- Promoting circular economy practices across our operations.
- Supporting renewable energy investments and exploring carbon offsetting programmes where appropriate.
- Complying with UK environmental regulations, including the Climate Change Act and other applicable standards and recommendations.
- Engaging stakeholders to foster environmental responsibility and continuous improvement.

## Environmental Stewardship

- We conduct environmental impact assessments for relevant projects and operations.
- We protect biodiversity and natural habitats, by promoting responsible land use practices including recycling.
- We require suppliers and partners to adhere to equivalent environmental standards.
- We engage with stakeholders and local communities to address environmental concerns and support green initiatives.

## Social Policy

### Diversity, Equity, and Inclusion

- We are committed to an inclusive workplace, upholding the Equality Act 2010 and all anti-discrimination laws.
- We ensure equal opportunities and prohibit discrimination on any protected characteristic.
- We promote diversity at all levels, including leadership, and encourage employee-led initiatives that promote diversity and inclusion in the workplace.
- Employee Well-being and Human Rights
- We prioritise health, safety, and well-being, complying with the Health and Safety at Work Act 1974.
- We provide flexible working, employee assistance programmes, and mental health support.
- We uphold the Modern Slavery Act 2015, enforcing a zero-tolerance approach to forced labour, human trafficking, and child labour in our business and supply chain.
- We ensure freedom of association, fair pay, and safe working conditions for all employees and contractors.

### Community Engagement and Social Value

- We support UK-based charities and community projects aligned with our values.
- We encourage employee volunteering and social impact initiatives.
- We comply with the Procurement Act 2023, integrating social value and sustainability into our procurement and supply chain decisions.

## Governance Policy

### Corporate Governance

- We maintain a board of directors with diverse skills and backgrounds, in line with the UK Corporate Governance Code 2024.
- We ensure clear separation of roles and responsibilities between the board and management.
- We promote transparency, accountability, and integrity in all corporate decisions and reporting.
- We comply with the Companies Act 2006, including duties to consider the impact of our operations on the community and environment.

### Ethics and Conduct

- We uphold the highest standards of ethical conduct, complying with the UK Bribery Act 2010, Modern Slavery Act 2015, and all relevant laws.
- We will implement a Code of Ethics for all employees, management, and board members.
- We provide accessible grievance mechanisms for all stakeholders to raise ESG-related concerns.



- We provide robust whistleblowing mechanisms, protecting those who report concerns in good faith.
- We prohibit retaliation, bribery, corruption, and unethical behaviour in any form.

Data Protection and Privacy

We comply with the UK Data Protection Act 2018 and UK GDPR, ensuring the privacy and security of all personal and client data processed in our operations.

Compliance and Risk Management

- We maintain a comprehensive compliance framework, regularly reviewing and updating policies to reflect legal and regulatory changes.
- We will implement a risk management system to identify, assess, and mitigate ESG-related risks.
- We comply with anti-money laundering and counter-terrorist financing regulations.
- We will conduct regular reviews to ensure compliance with ESG requirements.
- We require suppliers and partners to adhere to equivalent social, governance, and data protection standards, and conduct due diligence across our supply chain.

Monitoring, Reporting, and Continuous Improvement

- We report annually on our ESG performance, in line with UK SRS, SECR, and other disclosure requirements.
- We establish and monitor key performance indicators (KPIs) for ESG goals, including carbon emissions, diversity metrics, training completion, and supply chain audits.
- We engage with stakeholders, including employees, investors, customers, and communities, to gather feedback and improve our ESG practices.
- We operate on a “comply or explain” basis where permitted, providing transparent explanations for any areas of non-compliance.

Policy Review and Approval

This policy is reviewed annually and updated as required to reflect changes in law, regulation, and best practice.

Signed,

Signed by:  
  
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Graeme Smith  
Chief Technical Officer

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| <b>Owner</b><br>Graeme Smith                  | <b>Author</b><br>Karen Lightfoot |
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