FENTON PHARMACEUTICALS LTD

SUSTAINABILITY & ESG POLICY

Responsible business, carbon reduction and sustainable supply chains

Fenton Pharmaceuticals

PUBLIC POLICY

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Developed with guidance from

Beyond Procurement Ltd

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CONTENTS

PART ONE — POLICY FOUNDATION 4

1. Policy Statement 4
2. Purpose and Status of the Policy 4
3. Scope 4
4. Definitions 5
5. Our Sustainability Vision and Guiding Principles 5
6. Leadership, Governance and Accountability 6
7. Understanding Our Impacts, Risks and Opportunities 7

PART TWO — OUR ESG COMMITMENTS 7

8. Environmental Stewardship 7
9. Carbon Measurement and Carbon Reduction 7
10. Carbon Reduction Plan, Targets and Net Zero 8
11. Climate Adaptation and Organisational Resilience 8
12. Social Responsibility 8
13. Ethical Governance and Responsible Business 9
14. Sustainable Procurement and Supply-Chain Management 9
15. Supplier Engagement, Guidance and Support 9

PART THREE — IMPLEMENTATION AND DELIVERY 10

16. The Beyond Sustainability Hub 10
17. Employee Engagement, Training and Capability 10
18. Objectives, Action Planning and Continual Improvement 10

PART FOUR — MEASUREMENT, REPORTING AND CONTROL 11

19. Performance Measurement and Key Indicators 11
20. Data Quality, Evidence and Quality Assurance 11
21. Reporting, Transparency and Communications 11
22. Applicable Law, Standards and Guidance 12
23. Related Documents and Corporate Arrangements 12
24. Non-Compliance, Concerns and Corrective Action 12
25. Policy Review and Approval 12

PART ONE — POLICY FOUNDATION

Why this policy exists, who it applies to and the principles that guide our approach.

1. Policy Statement

We recognise that responsible and sustainable business is fundamental to long-term commercial success. Climate change, resource constraints, changing customer expectations, supply-chain pressures and evolving legal and contractual requirements create both risks and opportunities for organisations of every size and sector.

We are committed to reducing our environmental impacts, supporting our people, operating ethically, strengthening resilience and working collaboratively with our suppliers and wider stakeholders. We will integrate sustainability into relevant business decisions so that environmental and social considerations are managed alongside cost, quality, service, risk and long-term value.

Our approach is practical and evidence-led. We recognise that better business practices can reduce cost and carbon while building a stronger organisation. We also recognise that meaningful progress requires continual improvement rather than isolated commitments or unsupported claims.

Supply-chain emissions are often the largest or one of the largest elements of an organisational carbon footprint. Measurement and supplier demands alone will not deliver the necessary change. We will therefore provide or facilitate proportionate guidance, training, tools and collaborative support to help relevant suppliers improve their own performance and contribute to our shared objectives.

This policy has been developed with guidance from Beyond Procurement Ltd and provides the overarching framework for our environmental, climate, social and governance commitments.

2. Purpose and Status of the Policy

The purpose of this policy is to establish a clear and integrated framework for managing sustainability and Environmental, Social and Governance (ESG) responsibilities across the organisation.

This is our overarching Sustainability & ESG Policy. It brings together our environmental stewardship, carbon reduction, climate resilience, social responsibility, ethical business and sustainable procurement commitments within one controlled document.

The policy establishes our enduring commitments. Current emissions data, organisational and reporting boundaries, targets, actions and progress are maintained within our current Carbon Reduction Plan and are not duplicated here.

THE POLICY Sets our enduring sustainability and ESG commitments and explains how they are governed.	**CARBON REDUCTION PLAN** Records our current emissions, boundaries, targets, actions and annual progress.
BEYOND METHODOLOGY Defines how our greenhouse gas emissions are measured, validated and quality-assured.	**SUSTAINABILITY HUB** Supports implementation through guidance, training, action planning and supplier engagement.

The Carbon Reduction Plan will be published alongside this policy and reviewed annually. The policy itself will be reviewed at least annually and updated when material changes to our activities, commitments, methodology, legal requirements or supporting arrangements make amendment necessary.

3. Scope

This policy applies to all directors, employees, temporary and agency workers, contractors, consultants and other individuals acting on behalf of the organisation.

It applies across all company-controlled operations, business locations, strategic and operational decision-making, investment decisions, procurement activities and supplier-management processes.

The policy also informs the expectations we communicate to suppliers, subcontractors and business partners. Specific supplier obligations will be established through contracts, specifications, the Supplier Code of Conduct and other applicable requirements.

Where the organisation operates through subsidiaries, joint ventures, leased assets or other arrangements, the relevant organisational and reporting boundaries will be defined in the current Carbon Reduction Plan in accordance with the Beyond Procurement Carbon Accounting Methodology.

4. Definitions

TERM	DEFINITION
Sustainability	Operating in a way that supports long-term commercial resilience while managing environmental and social impacts and creating value for stakeholders.
ESG	The environmental, social and governance considerations used to assess and manage responsible business performance, risk and opportunity.
Greenhouse gas emissions	Emissions of gases that contribute to climate change, reported as tonnes of carbon dioxide equivalent (tCO2e).
Scope 1	Direct greenhouse gas emissions from sources owned or controlled by the organisation.
Scope 2	Indirect greenhouse gas emissions associated with purchased electricity, heat, steam or cooling.
Scope 3	Other indirect emissions arising across the organisation's value chain, including purchased goods and services, transport, waste, business travel, commuting and other relevant categories.
Carbon Reduction Plan	The current public document that records our reporting boundary, baseline, annual emissions, targets, planned actions and progress.
Net zero	A state in which deep reductions have been achieved and any residual greenhouse gas emissions are balanced by equivalent removals in accordance with recognised guidance.
Material impact	An environmental, social or governance impact, risk or opportunity significant enough to influence decisions, priorities, performance or stakeholder expectations.
Value chain	The activities, organisations and relationships involved upstream and downstream in delivering our products or services.
Beyond Sustainability Hub	The platform and support environment used to provide structured guidance, learning, supplier engagement, action planning and continual improvement support.

5. Our Sustainability Vision and Guiding Principles

Our vision is to build a commercially strong, responsible and resilient organisation that continually reduces its environmental impacts, supports people and communities, and earns trust through transparent and ethical governance.

Organisations may begin their sustainability journey from different commercial and operational positions. Our approach supports progressive movement from survival, through stability and resilience, towards sustainability. At every stage, priorities should be proportionate, practical and connected to business value.

PRINCIPLE	WHAT IT MEANS IN PRACTICE
Commercially viable	We will seek practical actions that strengthen the organisation while reducing environmental and social impacts.

PRINCIPLE	WHAT IT MEANS IN PRACTICE
Material and proportionate	We will focus resources on the impacts, risks and opportunities most relevant to our operations and value chain.
Evidence-led	We will use credible data, recognised methodologies and documented evidence to inform decisions and claims.
Reduction first	We will prioritise real emissions reductions before considering offsetting or other compensatory measures.
Collaborative	We will support employees and suppliers to improve rather than relying on compliance demands alone.
Continual improvement	We will review performance, learn from experience and strengthen our approach year after year.

6. Leadership, Governance and Accountability

The Managing Director or Owner acts as Executive Sponsor for this policy and retains ultimate accountability for its approval, oversight and implementation. Operational responsibilities may be delegated, but executive accountability remains at the highest appropriate level within the organisation.

ROLE	RESPONSIBILITY
Executive Sponsor — Managing Director / Owner	Approves this policy and the current Carbon Reduction Plan; endorses targets; ensures appropriate participation and resources; reviews progress at least annually; and ensures material risks, failures or misleading claims are addressed.
Nominated Coordinator	Coordinates information, actions and evidence; liaises with Beyond Procurement; tracks agreed activities; and supports communication across the organisation.
Managers and Data Owners	Provide complete and timely information, explain material changes, implement relevant actions and support employees within their areas of responsibility.
Employees and Workers	Follow relevant procedures, participate in training and engagement, use resources responsibly, provide accurate information and identify opportunities for improvement.
Procurement and Contract Owners	Integrate proportionate sustainability considerations into sourcing, supplier selection, contracting and supplier management.
Beyond Procurement	Supports carbon measurement, reporting, supplier engagement, guidance and access to the Beyond Sustainability Hub in accordance with the services agreed with the organisation.
Suppliers and Business Partners	Meet applicable legal and contractual requirements, support information requests, engage constructively and work towards the expectations communicated through the Supplier Code of Conduct.

7. Understanding Our Impacts, Risks and Opportunities

We will identify and review the sustainability and ESG matters most relevant to our activities, value chain and stakeholders. This review will inform objectives, actions, resource allocation and reporting.

Our assessment will consider, where relevant:

- our operations, sites, products and services;
- greenhouse gas emissions and other environmental impacts;
- procurement categories, suppliers and supply-chain dependencies;
- employees, working practices, skills, wellbeing and organisational culture;
- customers, communities and other stakeholders;
- legal, regulatory, contractual and public procurement requirements;
- physical and transition risks associated with climate change;
- opportunities to reduce cost, carbon, resource consumption and operational risk; and
- data quality, evidence and capability gaps that may limit effective decision-making.

We will prioritise matters according to their materiality and the organisation's ability to influence outcomes. This enables us to focus effort where it can deliver the greatest practical benefit.

PART TWO — OUR ESG COMMITMENTS

The environmental, social and governance commitments that direct our decisions and actions.

8. Environmental Stewardship

We will manage the environmental impacts associated with our operations, products, services and value chain in a proportionate and systematic way. We will comply with applicable environmental requirements and seek continual improvement beyond minimum compliance where this is practical and material.

Our environmental priorities will include, where relevant to our activities:

- improving energy efficiency and reducing avoidable consumption;
- using lower-carbon and renewable energy options where commercially and operationally appropriate;
- preventing waste and applying the waste hierarchy of prevention, reduction, reuse, recycling, recovery and responsible disposal;
- supporting circular-economy principles through durability, repair, reuse, responsible purchasing and reduced packaging;
- using water and other natural resources responsibly;
- preventing pollution and managing materials, substances and environmental incidents appropriately;
- considering biodiversity and nature-related impacts where these are material;
- reducing avoidable travel and supporting lower-carbon travel choices;
- integrating environmental considerations into procurement, investment and operational planning; and
- engaging employees, customers and suppliers in practical improvement.

Detailed operational expectations may be established through supporting procedures, including the Travel Policy and Switch-Off and Energy Efficiency Policy.

9. Carbon Measurement and Carbon Reduction

FENTON PHARMACEUTICALS LTD will measure and report our organisational greenhouse gas emissions annually in accordance with the Beyond Procurement Carbon Accounting Methodology. The methodology provides a consistent framework for defining boundaries, classifying emissions, selecting emissions factors, validating data, documenting assumptions and exclusions, and maintaining an appropriate quality-assurance and audit trail.

Our annual carbon-accounting process will:

- define and document the organisational and reporting boundaries;
- account for Scope 1 and Scope 2 emissions;
- screen all Scope 3 categories and include those that are material and relevant;
- use primary activity data wherever reasonably available;
- apply appropriate and recognised emissions factors;
- document material estimates, assumptions, exclusions and limitations;
- identify emissions hotspots and reduction opportunities;
- compare performance with the baseline and prior reporting periods;
- improve data completeness, accuracy and supplier-specific information over time; and
- support internal review, customer requirements and external assurance where required.

We will prioritise direct emissions reductions through practical changes to energy, travel, fleet, materials, purchasing, processes, waste and supplier engagement. Offsetting or other compensatory measures will not be used as a substitute for feasible reduction and will only be considered for residual emissions on a credible and evidenced basis.

10. Carbon Reduction Plan, Targets and Net Zero

FENTON PHARMACEUTICALS LTD will maintain a current Carbon Reduction Plan that is approved by the Executive Sponsor and published on our website alongside this policy.

The Carbon Reduction Plan will define and report:

- our organisational and reporting boundaries;
- the baseline year and current reporting period;
- our Scope 1, Scope 2 and material Scope 3 emissions;
- our principal emissions sources and data limitations;
- our net-zero commitment;
- measurable and time-bound carbon-reduction targets;
- the actions planned to deliver those targets; and
- progress against the baseline, prior years and previously stated commitments.

The Carbon Reduction Plan will be reviewed and updated annually. Targets will be reviewed where material changes to the organisation, reporting boundary, methodology, data quality or commercial circumstances affect their continued relevance or credibility.

Policy and targets

This policy does not repeat annual emissions figures or target values. The current approved Carbon Reduction Plan is the authoritative source for our carbon baseline, results, targets and progress.

11. Climate Adaptation and Organisational Resilience

Reducing emissions is essential, but the organisation must also prepare for the physical and economic effects of a changing climate. We will consider material climate-related risks within existing risk-management, business-continuity, supplier-management and strategic-planning arrangements.

Relevant physical risks may include heat, severe weather, flooding, water stress, disruption to transport or infrastructure, impacts on premises and changing working conditions. Relevant transition risks may include legislation, customer expectations, procurement requirements, technology, market change, insurance and access to finance.

Where material, we will:

- identify critical operations, assets, resources and supply-chain dependencies;
- consider employee safety, wellbeing and working arrangements;
- strengthen business-continuity, communication, IT and remote-working arrangements;
- review energy, water, transport and infrastructure dependencies;
- consider geographic concentration and supplier resilience;
- engage suppliers on continuity and emerging risks;
- include material climate risks within decision-making and investment; and
- review emerging risks and lessons learned following disruption.

12. Social Responsibility

Our people are central to the organisation's success. We are committed to a safe, fair, inclusive and respectful working environment in which people are supported to contribute, develop and raise concerns.

Our social commitments include:

- protecting health, safety and wellbeing;
- promoting fair treatment, equality of opportunity, diversity and inclusion;
- supporting employee engagement, voice and constructive feedback;
- providing relevant learning, development and opportunities to build capability;
- maintaining responsible employment practices and respecting human rights;
- opposing forced labour, exploitation, harassment and discrimination;
- treating customers, suppliers, subcontractors and other stakeholders fairly;
- considering community impacts and opportunities to create social value; and
- supporting accessible and proportionate participation by smaller suppliers and local businesses where relevant.

Specific employment, health and safety, equality and human-resources requirements will continue to be governed through the organisation's relevant corporate arrangements. This policy establishes the overarching social commitments against which those arrangements should operate.

13. Ethical Governance and Responsible Business

We will conduct business with integrity, transparency and accountability. We will comply with applicable law and contractual obligations and will seek to ensure that decisions and public statements are supported by appropriate evidence.

Our governance commitments include:

- clear executive sponsorship and responsibility;
- ethical decision-making and management of conflicts of interest;
- prevention of bribery, corruption, fraud and other improper conduct;
- respect for data protection, confidentiality and information security;
- appropriate routes for employees and stakeholders to raise concerns;
- consideration of modern slavery and human-rights risks within relevant operations and supply chains;
- maintenance of records supporting material decisions and disclosures;
- proportionate management of environmental, social, ethical and reputational risks; and
- accurate, balanced and evidence-based sustainability communications.

We will not knowingly make environmental or social claims that are misleading, exaggerated, selective or unsupported. Material public claims will be reviewed by an appropriate responsible person before publication.

14. Sustainable Procurement and Supply-Chain Management

Procurement decisions can influence cost, carbon, resource use, social outcomes and organisational resilience. We will integrate proportionate sustainability considerations into relevant sourcing, contracting and supplier-management activities alongside quality, service, value for money and risk.

Where material to the purchase or contract, we will consider:

- whole-life cost rather than initial purchase price alone;
- energy use, carbon emissions and other environmental impacts;
- durability, maintainability, repair, reuse and end-of-life options;
- waste, packaging, recycled content and circular-economy opportunities;
- responsible sourcing, labour practices and human-rights risks;
- available environmental product information, product carbon footprints or verified supplier data;
- local and social value where relevant;
- supply continuity, geographic exposure and resilience;
- the supplier's current sustainability maturity and willingness to improve; and
- the proportionality of requirements for SMEs and other suppliers with limited resources.

Sustainable procurement is not a single pass-or-fail test and does not mean selecting the supplier with the lowest reported emissions in isolation. Decisions will balance commercial performance, service continuity, evidence, risk and the supplier's capability and commitment to improvement.

15. Supplier Engagement, Guidance and Support

We recognise that supply-chain emissions frequently represent the largest or one of the largest parts of an organisation's carbon footprint. Our current Carbon Reduction Plan identifies the material contribution of our own value chain and informs the priorities for supplier engagement.

Meaningful reduction cannot be achieved through data requests and compliance demands alone. Many suppliers, particularly SMEs, require practical guidance, training and time to develop their capability. We will therefore take a collaborative and proportionate approach.

We will progressively engage suppliers, prioritising those with the greatest emissions impact, strategic importance, risk or opportunity. Our approach will include, where relevant:

- explaining why information is requested and how it supports shared outcomes;
- improving the availability and quality of primary supplier data;
- providing or facilitating access to guidance, training, tools and specialist support;
- helping suppliers understand carbon measurement, reduction planning and customer requirements;
- identifying shared opportunities to reduce cost, carbon, waste and risk;
- encouraging appropriate targets, action plans and Carbon Reduction Plans;
- tracking participation, evidence and improvement over time; and
- using constructive improvement plans before considering exclusion, except where serious legal, ethical or contractual breaches require stronger action.

Improvements made within the supply chain contribute directly to our own Scope 3 reporting, Carbon Reduction Plan, procurement decisions, resilience and carbon-reduction objectives.

PART THREE — IMPLEMENTATION AND DELIVERY

How the organisation, its people and suppliers turn policy commitments into practical action.

16. The Beyond Sustainability Hub

FENTON PHARMACEUTICALS LTD uses the Beyond Sustainability Hub to support implementation of this policy across the organisation and, where relevant, within our supply chain.

The Hub provides a structured environment for practical guidance, learning, engagement and continual improvement. It supports organisations and suppliers at different levels of maturity and helps direct attention towards the actions most relevant to their circumstances, material impacts and commercial priorities.

Through the Hub, we will provide or facilitate access to:

- structured sustainability guidance and practical resources;
- role-relevant learning and capability development;
- supplier invitations, guidance and engagement support;
- webinars, clinics and opportunities to learn from specialists and peers;
- procurement, cost-reduction and carbon-reduction resources;
- action planning and progress tracking;
- supporting evidence for tenders, customer assessments and reporting; and
- knowledge sharing and collaboration across the organisation and value chain.

The Hub supports implementation; it does not transfer accountability away from the organisation. The Executive Sponsor, managers, employees and suppliers remain responsible for the actions and information within their control.

17. Employee Engagement, Training and Capability

Effective implementation requires employees to understand how this policy relates to their roles. We will communicate the policy and provide training, guidance and resources proportionate to relevant responsibilities and impacts.

We will:

- include sustainability within relevant induction, communications and management activity;
- provide role-appropriate training rather than relying solely on generic awareness;
- use the Beyond Sustainability Hub and other appropriate learning resources;
- encourage employees to identify cost, carbon, resource and process improvements;
- support sustainability champions or working groups where these add value;
- ensure data owners understand the information and evidence required;
- share relevant performance updates and lessons learned; and
- recognise that behaviour, capability and culture are essential to lasting improvement.

18. Objectives, Action Planning and Continual Improvement

We will convert this policy into practical action through an annual cycle of measurement, review, prioritisation, implementation and reporting.

At least annually, we will:

- review material ESG impacts, risks, opportunities and stakeholder requirements;
- complete or update the organisational carbon footprint;
- review performance against the baseline, targets and prior commitments;
- identify priority environmental, social, governance and resilience actions;
- assign owners, timescales, evidence requirements and relevant measures;
- engage employees and priority suppliers;
- monitor delivery and address barriers or delays;
- review progress with the Executive Sponsor; and
- update the Carbon Reduction Plan and other public reporting as required.

Actions may be managed through the Carbon Reduction Plan, the Beyond Sustainability Hub, an ESG action tracker or existing business plans. The management system used should remain proportionate to the organisation and capable of demonstrating ownership and progress.

PART FOUR — MEASUREMENT, REPORTING AND CONTROL

How performance is evidenced, communicated, reviewed and corrected.

19. Performance Measurement and Key Indicators

We will monitor indicators relevant to our material impacts, objectives and stakeholder requirements. The specific indicators used may vary over time, but carbon performance and progress against the current Carbon Reduction Plan will be reviewed annually.

AREA	POTENTIAL INDICATORS — SELECTED ACCORDING TO MATERIALITY
Environmental	Scope 1, Scope 2 and Scope 3 emissions; carbon intensity; energy consumption; renewable electricity; fleet and travel emissions; waste and recycling; water use; purchased goods and services; supplier data quality.
Social	Health and safety; employee engagement; relevant training participation; equality and inclusion indicators; community and social value activity; supplier engagement and participation.
Governance	Policy and CRP review; completion of agreed actions; data quality; management review; significant incidents, concerns and corrective actions; compliance with applicable legal and contractual requirements.

Targets and indicators will be selected so that they are meaningful, measurable and proportionate. We will avoid collecting data that does not support decisions, compliance, stakeholder requirements or continual improvement.

20. Data Quality, Evidence and Quality Assurance

Credible sustainability management depends on reliable information. We will maintain evidence appropriate to the significance of the data, decision or claim being supported.

We will:

- use primary activity data wherever reasonably available;
- retain invoices, records, supplier information, calculations and other supporting evidence where appropriate;
- validate material data and investigate significant anomalies;
- document estimation methods, assumptions, exclusions and limitations;
- apply methods consistently between reporting periods;
- explain material methodological or boundary changes;
- improve data completeness and accuracy over time;
- support internal quality review and external assurance where required; and
- maintain an appropriate audit trail in accordance with the Beyond Procurement Carbon Accounting Methodology.

21. Reporting, Transparency and Communications

We will communicate our sustainability and ESG position in a manner that is accurate, balanced, transparent, evidence-based and clear about assumptions, limitations and areas requiring further improvement.

We will:

- publish the current approved Carbon Reduction Plan on our website;
- publish this policy alongside the Carbon Reduction Plan;
- communicate relevant commitments and responsibilities to employees and suppliers;
- provide appropriate information for tenders, customer assessments and contractual reporting;
- report material progress as well as significant gaps or delays;
- ensure public claims can be supported by available evidence;
- correct material errors or outdated information promptly; and
- obtain appropriate approval for significant external sustainability communications.

22. Applicable Law, Standards and Guidance

We will comply with environmental, corporate, employment, health and safety, data protection, procurement and other legal or regulatory requirements applicable to our activities. We will also meet relevant contractual, customer and public procurement requirements where they apply to the organisation or the contracts for which we bid.

Relevant requirements may include, where applicable, the Climate Change Act 2008, Environment Act 2021, Companies Act 2006, Procurement Act 2023 and applicable Procurement Policy Notes, Modern Slavery Act 2015, Equality Act 2010, Health and Safety at Work etc. Act 1974, Data Protection Act 2018 and UK GDPR.

Our greenhouse gas measurement and reporting will follow the Beyond Procurement Carbon Accounting Methodology, which aligns with recognised greenhouse gas accounting principles and guidance, including the GHG Protocol and ISO 14064-1 at organisational level. References w ll be reviewed as standards, guidance and legislation evolve.

23. Related Documents and Corporate Arrangements

The following documents directly support this policy:

- Current Carbon Reduction Plan;
- Beyond Procurement Carbon Accounting Methodology;
- Supplier Code of Conduct;
- Travel Policy; and
- Switch-Off and Energy Efficiency Policy.

This policy is also supported by the organisation's existing health and safety, employment, equality, data protection, whistleblowing, modern-slavery, anti-bribery and wider governance arrangements, where applicable. These corporate arrangements remain owned and controlled by the relevant functions within the organisation.

24. Non-Compliance, Concerns and Corrective Action

Employees and other relevant stakeholders are encouraged to raise material environmental, social, ethical, data-quality or reporting concerns through the appropriate manager, policy owner or corporate reporting route.

Where a material issue is identified, we will:

- assess its significance and any legal, contractual, environmental, social or reputational implications;
- correct inaccurate data, reporting or public statements;
- assign proportionate corrective actions, owners and timescales;
- monitor completion and verify that the issue has been addressed;
- capture relevant lessons and improve procedures or controls; and
- escalate serious or repeated failures to the Executive Sponsor.

Supplier non-compliance will be addressed according to its severity. This may involve clarification, guidance, an improvement plan, contractual remedies or termination. Serious legal, ethical or human-rights breaches will not be treated solely as development matters.

25. Policy Review and Approval

This policy will be reviewed at least annually and sooner where material changes to legislation, recognised guidance, organisational activities, stakeholder expectations, the Beyond Procurement methodology or the Beyond Sustainability Hub require amendment.

The review will consider the effectiveness of implementation, progress against the current Carbon Reduction Plan, data quality, stakeholder feedback, supplier engagement, significant incidents and opportunities for improvement.

The Managing Director or Owner, acting as Executive Sponsor, is responsible for approving the policy and confirming the organisation's continued commitment to its implementation.

APPROVAL

Formal adoption of the policy by the Executive Sponsor.

Approved by	Graham Hill
Position	Managing Director / Owner
Signature	
Approval date	01/09/2026
Next review date	31/08/2027

End of policy