

ESG Policy

EUROSTAR GROUP COMPANIES

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1. About this policy

- 1.1 Unless the context requires otherwise, the definition and interpretation of “we”, “Company” or “the business” shall mean Eurostar Group Holdings Limited together with its related companies and subsidiary companies.
- 1.2 The purpose of this policy is to provide information about ESG (Environmental, Social and Governance factors) and to encourage the business to understand ESG better.
- 1.3 This policy will inform our ESG efforts moving forward. This includes, but is not limited to, reporting, disclosures (material and non-material), business practices, policies, procedures, investments, board activities, stakeholder engagement and investor relations.
- 1.4 This policy has been agreed upon with the Directors and ESG Committee.
- 1.5 This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.
- 1.6 Nothing in this policy shall be taken or understood to limit or reduce our current legal or ethical obligations.

2. Who is responsible for this policy?

- 2.1 The Directors have overall responsibility for the effective operation of this policy. They have delegated responsibility for overseeing its implementation to the ESG Committee. Suggestions for change should be reported to the Chair.
- 2.2 Line managers have day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.
- 2.3 This policy is reviewed annually by the ESG Committee. Changes may be made at any time as government guidance develops.

3. Our ESG commitment

- 3.1 As a business, we recognize we have a duty to our people, our customers, and the wider world. We value investing in our people as we value protecting our environment and being a good corporate citizen. Fostering openness, sustainability and respect are key objectives.
- 3.2 ESG is about assessing our impact in the world, and taking concerted, defined and measurable action to improve it. Our view on ESG is that it is a continuous process of aligning our operations and controls with our values as a Company to do business both responsibly and sustainably.
- 3.3 ESG is fundamental to our reputation as a business and we want all our stakeholders, from customers and investors to our people, to be proud to be a part of our business. Part of that pride is understanding how our business makes a positive contribution to the world.

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4. Our statement on climate change and the environment

- 4.1 We are committed to environmentally sustainable initiatives as well as driving down our energy and carbon impact.
- 4.2 We encourage our customers to reduce their impact on the environment by recommending the use of more sustainable materials. We promote a paper-free office and support our clients to avoid printing.
- 4.3 We seek to comply with current environmental legislation and work to minimise the impact of our activities on the environment.

5. Our statement on social responsibility

- 5.1 We are committed to provide an inclusive and diverse work environment that supports employee development and promotes a good work-life balance.
- 5.2 We will support initiatives that benefit the environment, human welfare and education.
- 5.3 We will engage suppliers, customers and employees around safety, health and wellness.
- 5.4 We will preserve and promote the protection of human rights and welfare within our own business activities and supply chain, in accordance with our Employee Code of Conduct, Supplier Code of Conduct and Modern Slavery Policy.

6. Our statement on ethical governance

- 6.1 Our focus is to promote strong oversight, transparency and risk management at all levels of our organization, ensuring the resilience and long-term preservation of value for our business.
- 6.2 We will maintain good corporate governance practices through strong board stewardship, management accountability and proactive risk management.
- 6.3 We will mitigate risk exposure and build the resilience of our business to climate change and other events through smart design and analysis.
- 6.4 We are committed to high ethical standards through a strong Code of Conduct, ongoing training and executive leadership that promotes a culture of integrity.
- 6.5 We cultivate strong stakeholder relationships through transparency, open communications and responding to stakeholder input.
- 6.6 We establish clear and effective governance for ESG, set goals and establish accountability through our ESG committee and reported to the Board.

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7. Your role to play in ESG

7.1. As a member of our business, you have a responsibility to ensure our organisation thrives. When it comes to ESG, this means understanding your role in each area of ESG. You can do this by familiarising yourself with the concept of ESG, such as through this policy and Company training and also our strategic objectives. You should know:

- Our strategic ESG goals, how we plan to achieve them and over what time
- Your individual and team contribution to those goals
- How to discuss our ESG goals with customers and third parties where relevant
- Where to report potential concerns or actions which go against our policy

7.2 **You** have an important role to play in meeting our ESG objectives. Here's how:

7.3 **Environmental** - We all have a role to play in reducing carbon emissions and getting to net zero. Consider the choices you make and environmental impact:

- When travelling, are there more environmentally friendly options to take?
- Can some meetings be done remotely?
- Think before you print
- What recycling and energy saving measures are in place?

7.4 **Social** - Building a diverse and inclusive workforce where everyone feels valued is everyone's responsibility. You can help by:

- Challenging and reporting discriminatory or offensive behaviour
- Understanding diversity and inclusion policies
- Being an active ally for groups often underrepresented
- Leading by example in your work

7.5 **Governance** - Good governance is about understanding areas of risk and embedding compliance in your day-to-day work. Take governance to heart by:

- Be a compliance champion in your team
- Refer to policies and procedures instead of shortcuts
- Complete training on time
- Don't be afraid to call out poor behaviour or report failures

8. ESG and our value chain

8.1 Value is created through collaboration and partnerships. Traditional risks in supply chains were generally about quality, cost effectiveness and reliability. Ethical procurement within the context of ESG means paying attention to the carbon impacts of a supplier and the labour practises of an end-user.

8.2 Considering these impacts doesn't always mean refusing to work with someone in the value chain where there are concerns. Sometimes suppliers are limited, and customers have every right to access our services. It's about understanding the risks within each relationship and taking action to reduce those risks.

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8.3 For example, if there are concerns about a supplier’s labour practises, we can ensure clauses are inserted into contracts to maintain an adequate standard of employment for those working for the supplier. This can help actively change labour practises as opposed to simply refusing to work with a supplier. Or when working with a logistics provider, we might ask for emissions reporting so we can offset the carbon used.

9. How to procure ethically

9.1 Risk assessments: Undertake risk assessment of the value chain in order to identify key vulnerabilities based on supplier and customer needs.

9.2 Real-time tracking: Real-time tracking and traceability over suppliers and movements of goods and services.

9.3 Screening, risk-ranking & monitoring: Conduct ESG due diligence on suppliers to evaluate and rank them and monitor for ESG breaches.

9.4 Investigations: Investigate ESG incidents, have remediation plans ready and manage financial and reputational damage.

9.5 Incident response management: Build robust internal governance frameworks to respond to ESG issues in the value chain.

10. Our ESG committee

10.1 Our ESG committee comprises of Director and Senior Management representatives. The purpose of the committee is to gather and review data from across the business, then filter and summarise it upwards to the Board for inclusion within the annual report, including ESG disclosures.

10.2 The aim of the committee is to establish a unified view of ESG, increase understanding and awareness across all levels of the business of all three aspects, environmental, social and governance, (including goals and performance) and to promote robust standards of corporate governance.

11. Monitoring and enforcement

11.1 We seek to prevent and mitigate instances of non-compliance with this policy.

11.2 Any breaches or concerns should be reported as soon as possible through our whistleblowing channels (refer to the Staff Handbook).

11.3 Progress on this policy is reported to the Board on a regular basis. Active participation and engagement at all levels of the business is of great importance to ensure ownership of ESG by all staff. At minimum, we endeavour to maintain compliance with legislative requirements.

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