ctrg

Environmental Sustainability Policy

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1. About this policy

1.1. This Environmental Sustainability Policy formalises our commitment to supporting the principles of environmental sustainability and recognises that a sustainable environment is central to our lives and our work.

1.2. CTRG Limited is committed to managing its activities to promote environmental sustainability, conserve and enhance our natural resources, prevent environmental pollution and bring about continual improvement in our environmental performance.

1.3. The aim of this Environmental Sustainability Policy is to integrate a philosophy of environmental sustainability into all the organisation's activities and to establish and promote sound environmental practice in our operations. We will achieve this by:

a. Informing staff and stakeholders of our commitment to the environment and sustainability.

b. Setting Improvement Actions and Targets.

c. Supporting the implementation of environmental actions and targets within our organisation.

d. Monitoring the progress of those environmental actions and targets.

e. Communicating the outcome of those environmental actions and targets to relevant stakeholders and developing reporting processes in line with the Global Reporting Initiative (GRI).

2. Who is responsible for this policy?

2.1. This policy is owned by the Chief Operating Officer (COO). It was adopted on 6th January 2020 and will be reviewed every year. Changes may be made at any time based on guidance or amended organisational priorities.

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. Suggestions for changes or additions to this policy are welcome and should be reported to the Head of SHEQ.

3. Who does this policy apply to?

3.1. This policy covers all employees, officers, directors, consultants, contractors, volunteers, and temporary workers.

3.2. This policy is applicable to all aspects of our operations.

4. Environmental sustainability statement

4.1. The earth's environment is under severe stress from uncontrolled human activity, threatening the survival of our society and the performance of CTRG Limited's mission.

4.1. CTRG Limited respects our relationship with the natural environment and its ecosystems. We acknowledge the adverse impacts that human activity can impose and take actions to prevent degradation of those natural systems. We acknowledge the specific impacts of our business on the natural environment, and our responsibility as a good corporate citizen to ensure a natural environment that is sustainable.

4.2. CTRG Limited commits to the following principles and practices:

a. We are committed to achieving Net Zero by 2050 and will produce detailed Carbon Reduction Plans annually to identify progress towards our SBTi Near-Term and Net Zero Targets.

b. Developed and implement SBTi Near-Term targets for reduction in the following areas: Scope 1 Emissions reduced by 68% by 2035, Scope 2 Emissions reduced by 68% by 2035, Scope 3 Emissions reduced by 63.8% by 2032. This equates to annual reductions of 12.6% on our Scope 1, 2 and 3 emissions (These are covered in greater detail in our CSR Dashboard rows 80-90)

c. Produce an annual Streamlined Energy and Carbon Reporting (SECR) statement that will be included within the directors' reports.

d. Undertake 4 yearly audits to comply with the Energy Saving Opportunities Scheme (ESOS). Publish an Improvement Action Plan that details our intended Energy Savings that we expect to make in accordance with the reporting schedule published by the Environment Agency. The current improvements action plan will be publicly available on the Environment Agencies website via the "myesos portal".

e. Monitoring and managing our environmental performance and working towards targets set to reduce adverse impacts.

f. Complying with all relevant international, national and local environmental policy, practices, regulations and legislation, and industry-specific best practice.

g. Reducing the consumption of natural resources in daily operations, including water, paper and energy.

h. Maximising the recycling of resources.

i. Disposing of all waste appropriately, and minimising waste sent to non-recyclable disposal sites.

j. Committing to the principles of preventing pollution to the environment and continual improvement in our environmental management.

k. Minimising pollution by taking steps to limit carbon emissions resulting from vehicle and air travel.

l. Where possible, encouraging suppliers to meet the highest standards of environmental performance.

m. Communicating this policy to all employees, contractors and other stakeholders, as well as making this policy available to all interested parties via our website.

n. Reporting on the company's environmental performance in both internal and external communications, where relevant.

o. Reviewing this policy annually and measuring targets and performance as part of that review, publishing publicly our performance against Actions and Targets that we have set.

5. The natural environment and our assets

5.1. CTRG Limited commits to increasing opportunities for nature to thrive on the assets we own, lease or manage. This includes land, water and air which we have a financial interest in, own, lease, or otherwise manage.

5.2. We are committed to biodiversity and will work to ensure our actions on the assets we own or manage do not have a detrimental impact on the natural environment and will support biodiversity.

5.3. We will create clearly defined, time bound targets and objectives for minimising environmental impacts.

5.4. We will achieve this by:

a. Protecting and enhancing the quality and extent of the natural environment in the assets we own, lease or manage.

b. Supporting the conservation of trees, hedgerows, ponds, streams, coastal habitats and other aspects of the natural environment.

c. Managing our assets and those adjacent, such as public rights of way, coastal areas, play areas, playing fields and verges, in a manner that protects and increases biodiversity.

d. Introducing environmental growth opportunities and activities wherever we can on our assets.

e. Banning the use of balloons, sky lanterns, inefficient outdoor heating, and other materials and activities which could have a detrimental impact on the natural environment.

f. Phasing out the use of chemicals and pesticides on the assets we own, lease or manage, ensuring the safety and security of the varied biodiversity and preventing pollution of local water courses.

g. Ensuring that we identify all areas where we can conserve resources, especially water in drought prone areas.

h. Reviewing all areas of operations to ensure we have appropriate pollution prevention measures in place.

i. Ensure mechanisms are in place for effective energy efficiency and waste management measures.

5.4. We encourage the efficient use of water on all assets we own, lease or manage.

5.5. We will ensure staff and other users of our buildings are aware of how to reduce the use of water, and reuse water wherever possible.

6. Sustainable travel

6.1. We will promote and support modern working practices including remote working and hybrid working.

6.2. We encourage the use of digital meetings wherever possible.

6.3. We encourage staff to take public transport, cycle or walk to work wherever possible, and actively promoting local cycle to work schemes.

6.4. We support and encourage the use of electric and other ultra-low emissions hybrid vehicles by ensuring that our company vehicle policy only includes vehicle options that are in line with our objectives.

6.5. We will actively work to reduce air travel as much as possible. Where there is a recognised business need for air travel, we will work towards offsetting our emissions for air travel.

7. Waste and recycling

7.1. CTRG Limited commits to keeping waste to an absolute minimum by preventing, reusing, recycling or recovering waste wherever possible. We will ensure waste is sorted, stored and disposed of properly and in a sustainable manner in all our locations.

7.2. We aspire to be a zero-waste organisation. We will achieve this by:

a. Phasing out the use of single-use plastics.

b. Recycling 100% of recyclable material.

c. Reducing the use of non-recyclable material and offsetting where this is not possible.

d. Promoting and encourage recycling by all staff.

e. Using recyclable, compostable and/or recycled products on our premises.

f. Reducing the production of non-recyclable resources such as laminated or plastic based publicity material.

g. Minimise the amount of printing and the amount of wastepaper.

h. Using electronic communication as our primary method of communication and use an opt-in scheme for paper-based communication.

i. Minimising pollution and preventing it wherever possible, including light, noise, solids, liquids and chemicals.

j. Promoting the use of composting for organic waste.

8. Sustainable procurement

8.1. We aspire to reduce our carbon footprint throughout our supply chain. We commit to the principles of buying locally, seasonally, and making a concerted effort in all our procurement decisions to reduce the distance travelled between source and destination.

8.2. We commit to timely procurement and encourage less environmentally damaging ways for international procurement needs. When these decisions are made in a timely manner, overland or overseas shipping can be used instead of flights, which reduces the carbon footprint of the procurement spend compared to aviation.

8.3. Where air freight is unavoidable, we will monitor and record the emissions generated and seek to offset this as part of our carbon reduction plan.

8.4. We will meet the objectives of sustainable procurement by:

a. Sourcing materials and services locally and seasonally.

b. Sourcing temporary labour from communities local to the work location (to minimise the impact of transport to the environment and to benefit the economy of the local community).

c. Ensure catering and foodstuffs are sourced from organic, local, and/or fair-trade sources.

d. Ensure timber or other wood-based materials are sourced from recyclable and/or sustainable sources.

e. Ensure all consumables such as cleaning materials and inks are eco-friendly.

f. Encourage suppliers to document their sustainability policies and report their measures.

g. Review existing and plan for new procurement spending within the principles of environmental sustainability.

8.5. We require all suppliers to adopt principles of environmental sustainability and agree to our Supplier Code of Conduct (this is a contractual obligation).

9. Sustainable Forest Management and Deforestation-Free Sourcing

As part of our commitment to environmental stewardship, [Company Name] actively supports sustainable forest management and deforestation-free sourcing across all aspects of our operations and supply chain.

We pledge to:

- **Source Responsibly**: Ensure all wood, paper, and forest-derived products are sourced from suppliers who adhere to internationally recognized sustainable forestry standards, such as FSC® (Forest Stewardship Council) or PEFC™ (Programme for the Endorsement of Forest Certification).

- **Avoid Deforestation**: Maintain a strict deforestation-free sourcing policy, prioritizing materials and ingredients that do not contribute to the clearing of natural forests or degradation of high conservation value areas.

- **Engage Suppliers**: Work closely with suppliers to verify sourcing practices, promote transparency, and support capacity-building for sustainable land use and forest conservation.

- **Support Restoration**: Invest in or partner with initiatives that restore degraded forest landscapes and promote biodiversity, carbon sequestration, and community resilience.

- **Monitor and Report**: Regularly assess and report on our forest-related impacts, sourcing practices, and progress toward deforestation-free goals, using credible third-party audits and certifications where applicable.

By embedding these principles into our operations, we aim to protect forest ecosystems, reduce carbon emissions, and contribute to global efforts to halt biodiversity loss.

10. Our duty to the wider world

10.1. Human activities over the past 200 years, such as the burning of fossil fuels and land clearing, have led to an increased concentration of greenhouse gases in the lower atmosphere – increasing the average global temperature and precipitating a climate crisis. The 1997 *Kyoto Protocol* has defined the most prominent greenhouse gases as carbon dioxide, methane and nitrous oxide, as well as sulphur hexafluoride, hydrofluorocarbons and perfluorocarbons. Taken together, these greenhouse gas emissions are a key contributor to rapid climate change.

10.2. The use of electricity and gas is a key contributor to greenhouse gas emissions; however, our organisation cannot function without energy. Therefore, energy is one of the clearest and most important ways to reduce our overall emissions and is a key part of our commitment to reducing our carbon footprint. We recognize that energy efficiency is not just a business imperative—it's a responsibility to the planet. These efforts are already making a measurable difference. By lowering our energy demand, we're reducing our reliance on fossil fuels, which in turn decreases greenhouse gas emissions. This has a direct and positive impact on the health of our seas and oceans, where rising temperatures and acidification threaten marine ecosystems. Less energy consumption means fewer emissions, helping to slow the degradation of coral reefs and protect biodiversity in our waters.

Our commitment also extends to forest conservation. Many forests are cleared to make way for energy infrastructure or are affected by climate change driven by energy-related emissions. By cutting our energy use, we're contributing to the preservation of these vital ecosystems, which serve as carbon sinks and homes to countless species.

We're proud of the progress we've made, but we know there's more to do. Sustainability is a journey, and we're committed to continuous improvement—for our business, our communities, and the natural world we all depend on.

10.3. To accomplish a reduction in emissions from energy use, we have:

a. Undertaken an energy audit as part of our ESOS requirements.

b. Produced a plan to reduce our energy usage.

c. Produce a plan to switch to 100% renewable energy procurement.

d. Investigate if/how wind and solar energy can be used on our assets.

10.4. We will annually review and plan to reduce our Scope 1 emissions. These are emissions which occur from sources directly controlled by our organisation, such as gas fired boilers within our premises and fuel used in our company owned vehicles. We will produce and publish a plan to reduce our Scope 1 emissions as part of our Carbon Reduction Plan.

10.5. We will annually review and plan to reduce our Scope 2 emissions. These are indirect emissions from sources such as purchased electricity. We will produce and publish a plan to reduce our Scope 2 emissions (by moving to "Green" energy) as part of our Carbon Reduction Plan.

10.6. We will annually review and plan to reduce our Scope 3 emissions. These are emissions from our supply chain, travel and purchased goods. At present these emissions are partially estimated using government models combined with actual usage data, we are developing systems internally to collect this data. We will produce and publish a plan to reduce our Scope 3 emissions as part of our Carbon Reduction Plan.

10.7. Taken together, these efforts to move towards 100% renewable energy use, and to review and reduce our emissions at Scope 1, 2 and 3, to help us reach our SBTi Near-Term Targets and our Net Zero emissions target by 2050.

11. Information technology and sustainability

11.1. We will work towards the use of certified sustainable PCs, laptops, monitors, mobile devices, network and server hardware. All Laptop devices were changed for low energy consumption refurbished units.

11.2. Where possible, we will source IT equipment from recycled sources.

11.3. Non-standard IT equipment will not be used unless there is an unavoidable technical requirement precluding this. Non sustainable equipment or equipment with low energy efficiency will only be used where there is no alternative.

11.4. All equipment must be disposed of correctly through an approved e-waste recycling contractor or wiped and donated to charities. No IT equipment will be sent to landfill or thrown out.

11.5. We will make available the use of applications and systems to reduce the need for printing paper and reduce the use of personal printers where they are not required.

12. Training and staff involvement

12.1. We require all staff to undergo training on environmental sustainability and climate change. We will aim to raise awareness of environmental sustainability across our operations.

12.2. We encourage collaboration and involvement of all staff in our environmental sustainability efforts. Staff involvement is critical to ensuring the adoption of this policy and in our efforts to tackle climate change.

12.3. We will establish a sustainability steering group to drive involvement and stewardship of sustainability across the organisation.

13. Formal Review

13.1 In line with the requirements set out in section 2.1, this policy has been formally reviewed and found to be still valid and fit for purpose.

Steve Imber
Chief Operating Officer
Reviewed 14th July 2025