



Environmental Policy

Version 3.3

Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
1.0	Chloe Kuder	Mashudul Karim	Initial version or first version uploaded on portal - see ESG share for historical information	04/2021	03/2024
2.0	Chloe Kuder	Mashudul Karim	Annual review	03/2022	03/2024
3.0	Chloe Kuder	Mashudul Karim	Background text updated to reflect Environmental section of latest ESG Strategy as part of annual review.	09/2023	03/2024
3.1	Ketevan Moseshvili	Justine Finance-Elzokm	Minor edit: Update to staff changes.	03/2024	03/2025
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3.3	Ketevan Moseshvili	Justine Finance-Elzokm	Annual Review	03/2026	03/2027

Background

We need to limit our impact on the environment and address climate change for our clients, our company, and the world. Everyone must play their part in this and, as a trusted adviser to companies globally, it is our responsibility to ensure that the growth we deliver is sustainable.

Under our commitment to the United Nations Sustainable Development Goals (SDGs), we have identified three Global Goals through which we can make the greatest contribution on the environment:

- Responsible Consumption and Production
- Climate Action
- Sustainable Cities and Communities

We are also committed to the Paris Agreement and its aim of limiting the increase in the global average temperature to below two degrees Celsius.

To deliver on our commitment to these goals, we have developed a comprehensive package of programmes so that we can:

1. optimise our inputs;
2. reduce our outputs; and,
3. advocate for sustainability.

We have set ambitious targets to reduce our environmental footprint, and we rigorously examine our policies and practices to ensure consistency across all parts of our group. For more information, please visit <https://newable.co.uk/esg>.

The purpose of this document is to establish and articulate the Environmental Policy of Newable and its constituent business areas, in line with our overall ESG Strategy, and set out how we will guide decision-making and behaviour.

Scope

Concern for the environment and promoting a broader sustainability agenda are integral to Newable's public-facing commercial activities and its internal operational framework.

Newable recognises that it requires active participation and cooperation from key stakeholders to deliver successfully on its commitments on the environment and sustainability. To that end, this policy applies directly to all Newable employees as well as all third parties including partners and suppliers who work with the business or who undertake work on its behalf.

Key Principles

To guide its approach to minimising its impact on the environment and addressing climate change, Newable has adopted a set of key principles.

These principles are that Newable will:

- comply with, and exceed where practicable, all applicable environmental legislation, regulations and codes of practice;
- integrate sustainability considerations into business decisions and its approach to risk and opportunity management;
- optimise and reduce its business inputs across energy, paper, and single-use plastics;
- assess and minimise its outputs across waste and overall carbon emissions in order to eliminate waste to landfill and achieve carbon neutrality across business operations;
- set targets for, undertake regular reviews on and ensure continuous improvement of environmental and sustainability performance;
- implement centralised management to measure and address the environmental impacts of each business area;
- communicate regularly on progress and achievements against its environmental commitments;
- raise awareness of environmental issues and deliver training and education to employees to encourage responsible behaviour and empower them to play a leading role; and,
- communicate and engage with suppliers, partners and clients to encourage them to adopt equivalent (or superior) sustainability management practices.

Policy

1. Optimise inputs

To optimise and reduce its inputs, Newable's position on the use of energy, paper and single-use plastics is that all business units should endeavour to:

- use natural resources and energy more efficiently, reduce the energy consumption of existing office equipment, purchase equipment with better energy efficiency and practice good housekeeping at every opportunity; purchase, where possible, electricity from suppliers committed to renewable energy, maximise the proportion of energy from renewable sources and support investment in renewable energy schemes;
- encourage staff to walk, cycle or use public or electric transport; reduce travel to meetings through practical alternatives;
- revise working arrangements for staff where possible to minimise commuting except from their principal place of residence to their principal place of work; leverage new technologies to provide staff with viable alternatives to paper and deliver associated increases in efficiency and productivity; and,
- discourage and/or avoid the procurement of single-use plastics across all activities and operations and revise procurement policies and processes to favour alternatives.

2. Reduce outputs

Newable is committed to doing its part to limit the rise in global temperature and has set a goal to achieve Net Zero emissions for carbon in its utility use and transport by 2035. It will achieve this through Streamlined Energy & Carbon Reporting (SECR), which includes reporting on greenhouse gas emissions (in tonnes of carbon dioxide equivalent) and intensity metrics to quantify its impact per employee.

Newable will use this reporting and leverage external expertise to fully understand its carbon footprint. We will aim to review and refine our Carbon Roadmap annually, signed off from the ESG Team to help achieve carbon neutrality.

Newable will use the Carbon Roadmap along with energy efficiency solutions, low- carbon and renewable energy generation and purchase, as well as carbon offsetting to achieve its Net Zero emissions goal.

Newable's position on waste is that all business units should ensure that most of their output contributes to building a circular economy rather than going to landfill and it will track waste centrally to ensure recovery or recycling across all business locations and encourage sharing best practice across the group. Newable is also committed to sending No Waste to Landfill.

Newable has adopted the Five R's principle of Refuse, Reduce, Reuse, Repurpose and Recycle on waste production and complies fully with the Control of Substances Hazardous to Health

Regulations 2002. Newable is committed to separate waste as much as possible before collection across all workplaces to contribute to reducing contaminated recyclable waste and comply with Simpler Recycling legislation.

3. Advocate for sustainability

Newable is committed to being a positive influence on the communities in which it operates and will not pollute or cause health issues for those living in those communities or local wildlife through business waste or by-products.

To ensure environmental protection, Newable will follow relevant environmental legislation and regulations as part of its overall approach to risk and opportunity management and integrate climate change and risk management procedures into the due diligence work conducted by its business- level and group-level investment committees.

The ESG & Sustainability Manager and the Chief ESG Officer are responsible for implementing programmes to deliver environmental training and education to staff and increasing the level of communication and engagement to empower positive behavioural changes at work and at home.

In support of this, and in recognition of the importance of being proactive, Newable operates a volunteering scheme providing up to 28 volunteering hours for each full-time employee annually and encourages staff to use this to participate in green initiatives. Additionally, the ESG team aims to organise up to two company-wide environmentally related volunteering days per year.

Monitoring and reporting

Newable has an impact on the environment through its:

- use of natural resources and utilities (e.g., electricity, gas and water);
- production of waste (e.g., general, recycled, organic and electrical);
- travel (including fuel consumed through company mileage); and,
- suppliers, partners, and clients (i.e., emissions from the procurement and production of goods and services).

Newable's emissions are calculated on an annual basis, compared to the previous year, and it engages on a rolling 12-month programme to reduce energy consumption, supported by carbon offsetting activities where possible.

Newable measure its impact and monitors its environmental performance and compliance using an Environmental Management System (EMS) comprising the following components:

- ESG Strategy
- Environmental Policy (this document)
- Supplier Code of Conduct (and related assurance process)
- Procurement Policy
- Carbon Roadmap
- Environmental Action Plans
- Streamlined Energy and Carbon Reporting (SECR)
- Energy Savings Opportunity Scheme (ESOS)
- Environmental Management Systems and Utility portal
- Travel and Mileage Tracker

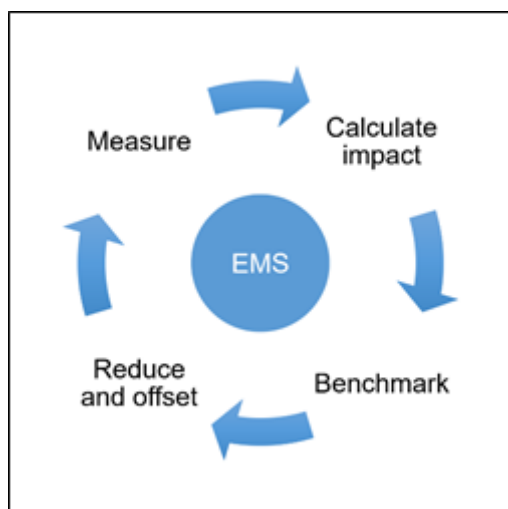
Newable also uses a comprehensive programme of formal assessments and reports as outlined below.

- Once a quarter, the Chief ESG Officer and ESG and Sustainability Manager review a report from the EMS on environmental inputs and outputs at each business location and reviews related environmental plans.
- Once a quarter, the Newable ESG Team reviews a report from the EMS on environmental inputs and outputs, aggregated to group level, and reviews exception reports giving details of areas of non-compliance (if any).
- Once a year, the Newable Board reviews a report from the ESG Team on performance against environmental Key Performance Indicators (KPIs).
- Once a year, an accredited third-party reviews Newable's performance against the SECR framework.
- Once every two years, an independent body undertakes an internal audit of Newable's approach to the environment and sustainability.

Continuous improvement

Newable recognises that, in pursuit of its objectives, it has an opportunity to consider and minimise the environmental impact of its activities through continuous improvement.

To that end, Newable's EMS operates on a Plan-Do-Check-Act (PDCA) cycle as illustrated below.



To support this approach, Newable controls its activities, promotes the use of sustainable resources, and discourages wasteful or damaging practices. It also works with its staff, suppliers, partners, and clients to promote environmentally sound practices and its ethos of environmental responsibility.

Management and control

The ESG Team, is responsible for reviewing and approving this policy once a year and for communicating it, as and when appropriate, to stakeholders including employees, clients, partners, and suppliers.

The ESG Team is supported in this work by:

- the ESG & Sustainability Manager, who is responsible for the practical application of this policy and its related processes and procedures as well as works to raise awareness of environmental matters across the business; and,
- the Chief ESG Officer, who is responsible for monitoring performance and compliance.