
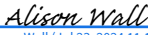
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SUSTAINABILITY POLICY

APPROVALS

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REVISION HISTORY

<i>AUTHOR</i>	<i>REVISED SECTION/PARAGRAPH</i>	<i>Version</i>	<i>Effective Date</i>	<i>Review Date</i>
Michael Wall	Initial release	1.0	22 May 2023	22 May 2025
Philip Rowe	Updated version – additions and clarifications to align with current sustainability efforts	2.0	12 August 2024	12 August 2026

**Draft and Archived/Obsolete revisions are not to be used.
Access the Quality Management Library to verify revision.**

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1. PURPOSE

The purpose of this document is to describe the sustainability policy for Plus-Project. Plus-Project embraces a broad set of Corporate Social Responsibility (CSR) goals that benefit our employees, customers, supply chain, and wider society. The Company's CSR objectives and Environmental, Social and Governance (ESG) practices are managed by a Sustainability Governance Team, sponsored by a member of the Plus-Project Board of Directors. The Company will embrace all diversity; conduct business ethically and sustainably; reduce carbon emissions; sign-up to measurable sustainability targets; and will develop a Carbon Emissions Reduction Plan.

2. SCOPE

This policy applies to Plus-Project employees and will be shared publicly.

3. DEFINITIONS

- CSR – Corporate Social Responsibility
- EOT – Employee Ownership Trust
- ESG – Environmental, Social and Governance
- SBTi – The Science Based Targets initiative drives ambitious climate action in the private sector by enabling organizations to set science-based emissions reduction targets
- STEM – Science, Technology, Engineering, Mathematics
- UN – United Nations

4. RESPONSIBILITIES


4.1 The Plus-Project Board

- Implement and sponsor a Sustainability Governance Team
- Monitor performance of the Sustainability Governance Team to ensure the Company's objectives are met
- Approve the Sustainability Plan developed by the Sustainability Governance Team
- Assess, document and monitor ESG risks within the organisation
- Incorporating sustainability in procurement and any related policies and/or agreements

4.2 Sustainability Governance Team

The Sustainability Governance Team will be sponsored by a member of the Plus-Project Board and led by the Sustainability Manager. Responsibilities include:

- Develop a Sustainability Plan including the environment, labour and human rights, ethics, diversity and procurement
- Work with external advisors on annual sustainability assessments
- Work with external advisors to define risks and opportunities
- Ensure training, including a pledge to reduce emissions, is available to all employees and suppliers
- Develop a Net Zero Transition Plan with assistance from the Board and external advisors
- Work with Plus-Project employees to agree a selection process for purchasing UN approved carbon offsetting products

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- Develop a sustainable procurement policy
- Interact with customers and suppliers on sustainability (e.g. contractual requirements, reporting, engagement meetings)
- Researching and monitoring industry best practice and any new or amended legislations
- Increase knowledge and awareness of all aspects of sustainability (e.g. conference attendance, trainings and networking events)
- Communicating our sustainability efforts publicly (e.g. website, social media)
- Employee engagement (i.e. newsletter, trainings and presentations)
- Engage supply chain (including office owners) to:
 - improve data quality for our ongoing sustainability assessment
 - increase shared awareness of sustainability efforts

4.3 Plus-Project Employees

Plus-Project employees will:

- Complete Plus-Project’s sustainability training including making a pledge to reduce carbon emissions
- Assist the Sustainability Governance Team where necessary with sustainability assessments
- Follow related policies (i.e. Business Travel Policy and Waste Electrical and Electronic Equipment Policy)
- Participate in engagement activities (e.g. sustainability surveys and sustainability newsletter content)

4.4 External Advisors

Plus-Project will use external advisors to assist with matters such as:


- Annual measurement of Company’s carbon footprint
- Sustainability legislation
- Offsetting schemes
- Training materials
- Any other environmental advice

5. COMMITMENTS

5.1 Ethics, Inclusion and Diversity Commitments

Plus-Project makes the following commitment to ethics and diversity:

- To always treat employees, customers, and suppliers fairly, regardless of background
- To engage with diverse suppliers
- Build relationships with universities; attend careers fairs to encourage people from all backgrounds to enter our industry
- Build relationships with local schools. Identify schools with a high number of minorities, who may not see Biostatistics as a viable career. Engage with these schools and their students, and encourage them to consider study STEM subjects at university
- Evaluate apprenticeships for those that may not typically enter our industry, where appropriate to do so

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- To spend at least 15% of our supplier budget on small and diverse businesses (this criteria includes other SMEs)
- To establish these commitments and beyond (i.e. anti-corruption, bribery prevention, data protection and cyber security) in a Plus-Project Code of Conduct
- To review our policies, procedures and culture to ensure that we are a work place that is diverse and inclusive

5.2 Financial Commitments

Plus-Project was the first Biostatistics CRO to embrace employee-ownership using the Employee Ownership Trust (EOT) model. Plus-Project commits to:

- Sharing the company's annual profits with all its employees on an equitable basis via bonuses where profits allow
- Engage with Trustees to independently assess whether important business decisions fairly consider the interest of employees
- Ensuring employees receive a fair proportion of generated profit should the company be sold, in line with the valuable shareholding that has been put in trust for the beneficiaries
- Investigate charitable donations and links to local communities under the leadership of an elected employee director(s)
- Act transparently in all our financial dealings
- Seek ethical finance options where practical (e.g. green pension provider)
- Enable employees to make charitable donations by establishing a Give As You Earn Scheme

5.3 Environmental Commitments

Plus-Project makes the following commitment to environmental targets:

- Carbon neutral certification from July 2022
- Registration with SBTi and a commitment towards Net Zero
- Investigate purchase of unbundled energy attribute certificates, such as Guarantees of Origin or International Renewable Energy Certificates
- All event planning will take into consideration sustainability (e.g. transportation, location, materials, suppliers)

5.4 Waste Management Commitments


Environmental impact is better reduced, rather than offset. Plus-Project aims to minimise the volume of waste produced by:

- Using metrics, including volume and type of waste produced where available, to determine whether changes in business processes have a positive impact on waste reduction
- Operating a paperless office environment
- Using recycling schemes
- Offsetting remaining waste through an accredited scheme

5.5 Recycling

Plus-Project commits to recycling.

- IT kit, such as laptops and monitors, are recycled by our audited IT Waste disposal company (see POL-12 Electrical and Electronic Equipment Policy). All sensitive data is

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securely removed and kit is safely distributed to local charities where possible. Disposal information is incorporated into our calculations and reporting.

- Sensitive waste must always be shredded and disposed of in the sensitive waste bins
- All other waste must be recycled in the appropriate recycling bins
- Printer cartridges are returned to HP for recycling via an approved returns envelope
- Batteries are taken to local recycling points

5.6 Transportation

Plus-Project is committed to reducing the Company's impact on the environment caused by business travel. These commitments have benefits beyond the workplace, for example, personal use of electric vehicles reduces an employee's wider carbon handprint.

- Plus-Project recognises the importance of meeting face to face. However, this should be balanced against carbon reduction efforts (see POL-11 Business Travel Policy)
- If flights are required, direct flights should be prioritised to minimise emissions
- The Company encourages employees to use public transport, or consider car share, for business miles, where practical
- The Company offers a Cycle to Work Scheme to encourage employees to cycle to work. This includes an interest free loan that allows employees to purchase a bicycle at roughly half list price
- All travel miles are monitored, and carbon emissions are calculated and offset annually through an accredited scheme
- After 12 months service, Employees (senior level or above) can take advantage of a Salary Sacrifice scheme, to lease an electric vehicle (EV) through Octopus

5.7 Sustainability Assessments


- Using a globally recognised scheme, Plus-Project's business sustainability will be assessed annually
- The Sustainability Governance Team will collect the required information to complete the assessment
- Feedback from these assessments will be incorporated into the Sustainability Plan

6. ENVIRONMENTAL ASSESSMENTS

6.1 Measuring, Reducing, And Offsetting Emissions

Plus-Project will work with external advisors to perform an annual assessment of the Company's environmental emissions. The process will be as follows:

- **Measure** - Comprehensive data will be collected each month and monitored internally. The Company's carbon footprint will be independently assessed by experts annually
- **Reduce** - Processes to avoid or reduce the Company's environmental impact will be implemented, monitored and improved, with KPIs measuring their effectiveness
- **Offset** - The Company's carbon footprint will be offset using schemes recognised by the United Nations
- **Certify** - The Company will renew its Carbon Neutral Certification annually

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6.2 Baseline Environmental Assessment

External advisors are responsible for performing an independent baseline environmental assessment.

- The Sustainability Governance Team will collect the required data
- The external advisors will:
 - Assess our environmental impact
 - Provide a baseline list of risks and opportunities
 - Create a training package to all employees and suppliers
- An Environmental Plan will be created by the Sustainability Governance Team and approved by The Board
- The external advisors will offset any carbon emissions using UN approved schemes chosen by the Sustainability Governance Team


6.3 Annual Environmental Assessments

An environmental assessment will be made annually.

- The Sustainability Governance Team will collect the required data
 - Endeavour to increase the quality of data going into these assessments
 - Investigate the potential to validate the data where possible
- External advisors will assess the annual environmental impact and evidence
- External advisors will provide an updated list of risks and opportunities
- The Environmental Plan will be updated by Sustainability Governance Team and approved by The Board
- The Net Zero Transition Plan will be updated by the Sustainability Governance Team and approved by The Board
- External advisors will offset any carbon emissions using UN approved schemes chosen by Plus-Project employees

7. MONITORING AND REPORTING

To monitor company progress in meeting this policy's purpose, sustainability KPIs and metrics will be identified, reported and monitored in Plus-Project's quarterly and annual management reports. Sustainability related KPIs and metrics are located within Plus-Project's expanded KPI document (held externally from this policy; Plus-Project Key Performance Indicators). Additionally, these KPIs are to be built into an annual impact report.

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8. APPLICABLE REFERENCES

- POL-11 Business Travel Policy
- POL-12 Electrical and Electronic Equipment Policy

9. APPENDICES

Not applicable

10. ATTACHMENTS

Not applicable

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Final Audit Report

2024-07-23

Created:	2024-07-23
By:	Human Resources (HumanResources@plus-project.co.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAABknhcKC5Zk8Xt2QVEEayQECiM7-1bN5o

"POL-07 Sustainability Policy v2.0" History

-  Document created by Human Resources (HumanResources@plus-project.co.uk)
2024-07-23 - 7:42:25 AM GMT
-  Document emailed to jackie.wall@plus-project.co.uk for signature
2024-07-23 - 7:42:29 AM GMT
-  Email viewed by jackie.wall@plus-project.co.uk
2024-07-23 - 7:46:05 AM GMT
-  Signer jackie.wall@plus-project.co.uk entered name at signing as JM Wall
2024-07-23 - 7:46:20 AM GMT
-  Document e-signed by JM Wall (jackie.wall@plus-project.co.uk)
Signature Date: 2024-07-23 - 7:46:22 AM GMT - Time Source: server
-  Document emailed to alison.wall@plus-project.co.uk (alison.wall@plus-project.co.uk) for signature
2024-07-23 - 7:46:23 AM GMT
-  Email viewed by alison.wall@plus-project.co.uk (alison.wall@plus-project.co.uk)
2024-07-23 - 10:18:42 AM GMT
-  Signer alison.wall@plus-project.co.uk (alison.wall@plus-project.co.uk) entered name at signing as Alison Wall
2024-07-23 - 10:18:58 AM GMT
-  Document e-signed by Alison Wall (alison.wall@plus-project.co.uk)
Signature Date: 2024-07-23 - 10:19:00 AM GMT - Time Source: server
-  Agreement completed.
2024-07-23 - 10:19:00 AM GMT