



# MAKING A POSITIVE IMPACT - ENVIRONMENT, SOCIAL AND GOVERNANCE (ESG) POLICY

PT011

CLASS 1 – GENERAL BUSINESS TO BUSINESS USE



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## 1 Purpose

We are committed to making a positive impact in the world through our business activities. This policy sets out our pledge to operate in an ethical, fair, legal, safe, responsible and sustainable manner, with a respect to all those affected by our business as well as the wider environment.

## 2 Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Please note, this policy and any contained procedures or processes are statements of general policy and do not form part of any employee's terms and conditions of employment or otherwise have contractual effect. The content of this document can be changed, withdrawn, or modified at Redwood's discretion at any time. Whilst the Company will endeavour to provide notice of any such change, it shall not be under an obligation to do so.

## 3 Principles

Our policy is based on some underlying principles:

- To at all times meet legislative requirements in the regions we operate.
- To ensure activities are carried out in a responsible and ethical manner, with respect to both people and the wider community. We have implemented an Ethical Policy based on this principle, based on adherence to the Ethical Trading Initiative (ETI) Base Code.
- To encourage the creation and maintenance of sustainable processes. We have implemented policies and procedures certified to ISO 9001 Quality Standard and ISO 14001 Environmental Standard based on this principle.
- To minimise and mitigate negative impacts that may be caused by our activities. Our implementation of ISO 14001 Environmental Standards helps us in achieving this principle.
- To review and continually strive to improve our performance. Our implementation of ISO 9001 Quality, ISO 14001 Environmental and ISO 27001 Information Security Standards assist us in delivering our commitment to continuous improvement.
- Underpinning all our ESG efforts, are our core values. These inform how positive and ethical behaviours look across Nasstar, and deliver good business outcomes for us, our customers, and the wider community:
  - Quality: We take the time to ensure everything we do, we do well.
  - Transformative: We help clients leverage technology for tangible operational and commercial benefit.
  - Collaboration: We leverage our collective genius.
  - Integrity: We uphold the highest standards of integrity in all our actions.
  - Simplicity: From the first transaction to absorbing our services, we make it simple.

- Nasstar operates an internal culture of openness, honesty and transparency. For that reason, any employee is free – and expected – to raise suggestions, observations and even issues about behaviour/processes in relation to this policy. They can do so informally to their line manager, to a Head of Department, or to a member of the People team for assistance. If they feel the matter is serious enough to raise formally, they can use the Grievance or Whistle-blowing procedures as appropriate.

## 4 Internal Activities Policy

### 4.1 Social

#### 4.1.1 People

Our employees are our most valuable resource and a key factor in delivery of services to our customers. We recognise that it is the calibre of the people that make up our teams that differentiates us from our competitors. As such, we work hard to recruit, develop and retain talented people.

We are committed to a culture that fosters career and personal development, in an environment free from unlawful discrimination and that actively promotes diversity, equity and inclusion. Our commitments broadly align with the key features reported in the *Good Work Plan* (satisfaction, fair pay, participation and progression, well-being, safety and security, voice and autonomy):

- We believe that diversity, equity and inclusion are catalysts for a successful and high performing workplace. Our Fair and Equal Treatment and Dignity at Work Policy, alongside our Ethical Policy below outline our commitments to these matters.
- We believe in providing a working environment where our people can do their best work and feel positive about the contribution they make to our success. We implement multiple initiatives that help provide a motivating workplace including regular performance reviews, setting and achieving personal objectives, and being recognised by managers for delivering good work.
- Our Personal Development and Training Policy and Procedure outlines our commitment to providing job and career development across all employees, including opportunity to have a Personal Development Plan (PDP), access to external courses/training.
- We maintain a strong commitment to promotion from within wherever possible.
- We are committed to broadening access to work through recruitment programmes including apprenticeships and work placements, including in pursuit of our customer's aims with their local community.
- We are committed to providing a safe working environment, both physically and mentally and implement a Health and Safety Policy, Stress Management Policy and additional health and wellbeing actions as part of this commitment.
- We are committed to exceeding basic human rights and labour standards wherever possible.
- We actively seek employee feedback and participation in future business plans through a range of means including surveys, suggestion/feedback schemes, employee representatives

and proactive feedback and general open communication between management and employees.

- We provide awareness training for our managers on a variety of topics that help to develop a motivating and safe environment where all employees can thrive and succeed.

We are committed to identifying, aligning with, implementing and maintaining appropriate external standards/pledges/certifications that demonstrate our commitments to diversity, equity and inclusion. For instance, the working forward pledge, the Disability Confident Scheme and the Mental Health at Work Commitment.

#### 4.1.2 Giving Back to the Community

We are dedicated to giving back to the communities in which we operate at a local and national level. As such we commit to several community and voluntary initiatives, including:

- An annual charity elected by employees for donations and sponsorship events.
- A donation of volunteer days for employees to be able to contribute work hour to worthy community / charitable causes.
- Give As You Earn opportunities through tax efficient payroll giving.
- A willingness and commitment to assist with providing local education opportunities on industry or other expertise within our business
- Providing workplace experience opportunities, particularly for those from an under-represented or underprivileged group in society.

## 4.2 Environment

We understand that humanity has created environmental challenges that affect life all over the planet. We aim to minimise the adverse effects our operations have on the environment and wider community. We ensure we have proper environmental permits (international, national and local) in place to conduct our business and operate to a certified ISO 14001 Environmental Standard where we set, maintain, monitor and continuously improve our environmental performance.

## 4.3 Governance and Compliance

Internal policies, procedures, practices and other controls are the essential building blocks for ensuring our business actually operates and can demonstrate that it operates in an ethical manner. We are committed to setting clear processes and policies across our business to deliver consistent, fair and quality outcomes for customers and shareholders.

Critical policies and processes include but are not limited to

- ISO certification standards such as ISO 9001, 14001, 27001
- Anti-bribery, Tax Evasion, Modern Slavery policies and statements
- Data Protection and Information Security policies
- Legislative reviews and risk registers
- Background Screening and appropriate assessment of recruited candidates for fitness to represent our business.

## 5 Ethical Policy

This policy is designed to ensure our proper implementation of our commitment to conducting business ethically and with integrity. This includes the provision of safe working conditions and the protection of worker's rights across Nasstar and our supply chain.

We operate with ethical standards, which include but are not limited to:

- Ensure we act with integrity.
- Recognise the responsibility to report any unethical practice.
- Embrace diversity and equal opportunity amongst our employees.
- Prohibit any form of discrimination against any employee.
- Promote an inclusive working environment free of any form of harassment, harsh or inhumane treatment.
- Provide reasonable and regular work hours at or above the region's living wage for all employees.
- Prohibit the use of child labour, forced slavery, servitude, forced or compulsory labour in the performance of our contracts/services which includes any practice which materially restricts a worker's freedom.
- Ensure that working conditions are safe and hygienic.
- Ensure that Employment is freely chosen.
- Respect the right of our employees to join a trade union, whether that union is recognised by us or not.

We acknowledge and are committed to meeting the Modern Slavery Act 2015 through our Modern Slavery and Human Trafficking Statement and to the ethical business conduct of all our team through the provisions of our Anti-Corruption and Bribery Policy and Policy On The Prevention of the Facilitation of Tax Evasion. These commitments are audited and maintained through the Group Quality Management System (QMS) aligned to the ISO 9001 Quality Standard.

## 6 Supplier and Customer Policy

Our relationships and transactions with suppliers and customers are conducted in accordance with the highest ethical standards of honesty, fairness and openness. We endeavour to enter into clear and fair contracts with our suppliers and customers, including a commitment to the timely settlement of invoices.

We expect new suppliers to be able to agree and adhere to our ethical standard, or an equivalent as outlined below. Existing suppliers are expected to adhere to these at the point of contract renewal:

### 1.1.1 Similar Ethical Trading Standard

A similar ethical trading standard could include, for example:

- The Ethical Trading Initiative (ETI) Base Code;
- Social Accountability International's SA8000;
- Chartered Institute of Purchasing and Supply Ethical Business Practices in Purchasing and Supply.

Other similar or specific commitments to Nasstar by the supplier may also be considered as a reasonable alternative.

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In addition to the above, our Supplier Code of Conduct sets forth specific requirements and standards expected of all our suppliers and vendors.

Wherever possible we will seek to support our customers' commitments through Environmental, Social and Governance policies, and especially with a view to public sector organisations where their own operations deliver social value within local communities.

End of policy text.

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Any suggested changes or amendments must be communicated through the author for consideration and inclusion if suitable.

## 8 Document Details and Change Summary

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