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**Lucy Group Ltd**


# **Sustainable Development Policy**

**January 2022**

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## REVISION HISTORY

Date Created	Issue	Reason for Change
18.08.21	1	1 <sup>st</sup> Issue
07.01.22	2	Updated Policy Statement page 4

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## 1.0 GENERAL STATEMENT OF POLICY FOR SUSTAINABILITY

Lucy Group takes a long-term approach; therefore, sustainability is an inherent part of our purpose, strategy, approach and values. Our aim is to deliver profitable growth whilst also contributing positively to wider society and the environment. Consideration is given to the short and long-term consequences of our business decisions, with effective action driving improvement through compliance with legislation, employment of emerging technologies and practices to deliver our goals in support those of our stakeholders. We understand for sustainability to be effective, it must be present in all business areas and promoted through consultation and communication with our employees, customers, and wider stakeholders.

Lucy Group is committed to a sustainable future and strongly advocates contributing positively to the needs of society, the environment and the economy based on three inter-linked pillars: People, Planet and Progress.

### People

- Enhance health, wellbeing, and quality of life for all through sustainable practices and policies.
- Provide a safe, healthy and stimulating workplace for our employees and stakeholders by implementing internationally recognised standards and driving continual improvement.
- Foster an environment of equality and mutual respect, free of discrimination in all forms and complying with legislation that protects individual Human Rights.
- Value employee's contribution by investing in their career development to maximise their full potential and providing fair financial remuneration.
- Support charitable, environmental and education initiatives to deliver positive impacts on society, the communities we work in and the environment.

### Planet


- Invest in research and smart technologies to develop innovative products and services that improve quality of life while reducing environmental impacts.
- Reduce energy consumption, emissions, and waste production by improving efficiency, recycling materials, and prioritising the use of renewable energy and sustainable practices. This includes setting targets and monitoring our performance to deliver improvements.
- Achieve continual environmental improvement through management systems that meet international standards.
- Promote the responsible use of natural resources in our businesses and by our stakeholders.
- Protect and enhance ecosystems and biodiversity.

### Progress

- Design and produce high-quality, sustainable products and services to add value and increase sustainability for our customers and wider stakeholders.
- Exercise high levels of Corporate Governance across the Group to achieve a balanced approach to sustainability.

PREPARED BY: Gregory Fenton    APPROVED BY: Jonathan Finch-Dick    DATE: 07.01.22

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- Actively encourage sustainable and ethical practices across the supply chain.
- Establish and monitor supplier engagement across the value chain.

Appropriate measurements and targets will be set to achieve continuous improvements across all areas identified above, with the Group's performance disclosed in its annual reporting.


This Sustainability Policy will be periodically reviewed and amended where appropriate.

Signed:

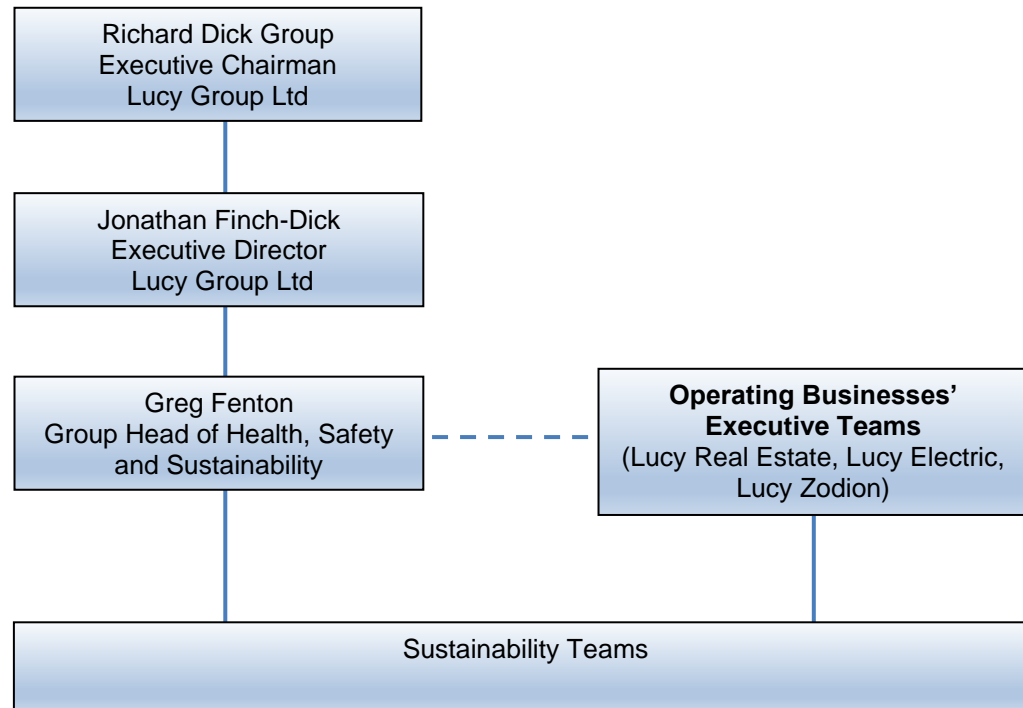
Date: 17 January 2022




**Richard Dick**  
Chairman  
Lucy Group

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## 2.0 ORGANISATIONAL CHART



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### 3.0 SPECIFIC MANAGEMENT RESPONSIBILITIES

#### 3.1 Group Chairman and Board of Directors

- a. Primarily responsible for ensuring that the requirements are set out for the Group to establish a sustainability framework.
- b. Promote the adoption of sustainable practices in all aspects of the Group's activities.
- c. Agree and communicate objectives and targets within the sustainability strategy.
- d. Provide adequate resources and funding to ensure targets are achievable.
- e. Drive innovation to develop new sustainable development practices.
- f. Establish sustainability as a consideration for all business decisions across the Group.

#### 3.2 Executive Director – with responsibility for Sustainability


- a. Work in close communication with the Group Head of Health, Safety and Sustainability, and the management of each business to establish and clearly communicate a sustainability framework to ensure the maintenance, monitoring, and improvement of sustainable development practices.
- b. Communicate the importance of sustainability across the Group and establish a Sustainability Team.
- c. Coordinate with the management of each business in establishing goals that contribute towards the Group's sustainability strategy.
- d. Maintain responsibility to ensure a strong sustainability culture within the management structure of the Group.
- e. Regularly review the Group's performance by monitoring KPIs and ensuring that targets deliver meaningful progression.
- f. Consult with the Executive Board on entering partnerships with organisations that add credibility to the Group's sustainability framework.

#### 3.3 Group Head of Health, Safety and Sustainability

- a. Establish a clear strategic sustainability framework in conjunction with the operating businesses and the Board to deliver the Group's wider sustainability aspirations.
- b. Propose sustainability targets and KPIs that drive change and deliver value.
- c. Propose how sustainability criteria and practices can be incorporated into decision making processes.
- d. Provide guidance and identify training requirements across the Group on sustainability practices.
- e. Ensure that effective systems are in place for the collation of data and performance monitoring.
- f. Work with the Group's key stakeholders to effectively communicate strategy, activities, and progress, both internally and externally.
- g. Ensure that all management teams understand that legal requirements are followed and that these are monitored, incorporated, and implemented into the practices and policies.
- h. Integrate contemporary sustainability issues and recommend adopting initiatives that assist delivering objectives and affirm the Group's commitment to sustainability.

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- i. Oversee the production of the annual sustainability reporting to ensure transparency with our stakeholders.


### 3.4 Chief Executive Officers, Senior Management and General Managers

- j. Provide leadership that fosters a strong culture of sustainability across the operating businesses.
- a. Incorporate sustainability issues into the decision-making process and placing them on the agenda for progress meetings.
- b. Engage with key stakeholders (customers, suppliers, employees, communities) to deliver both their and the Group's sustainability goals.
- c. Identify customer value and design products and services which add value and increase sustainability for customers.
- d. Appoint suitable persons with the responsibility for overseeing and reporting on sustainability within individual businesses.
- e. Work in close communication with the Group Head of Health, Safety and Sustainability to develop initiatives that drive continual improvement by setting and monitoring targets.
- f. Allocate funding and resources to achieve sustainability targets.
- g. Monitor progress towards sustainability targets and implement appropriate corrective actions where required.
- h. Develop sustainability initiatives that add value or reduce the impact of our business activities.
- i. Achieve employee engagement and inclusion by consulting on sustainability targets and initiatives.

### 3.5 Sustainability Team

- a. Consider the application of Group policy, frameworks, practices and reporting for the individual businesses and service lines.
- b. Consider the Group's sustainability approach to measuring and monitoring and make recommendations on changes/enhancements accordingly.
- c. Exchange and develop relevant and applicable learnings across the Group to increase efficiency and knowledge.
- d. Assess targets that drive continual improvement by reducing the negative and increasing the positive impacts of the Group's activities.
- e. Review the Group's performance against targets and report their findings to the Executive Board in the annual sustainability report.
- f. The team will meet tri-annually to review current progress and discuss potential barriers in achieving set targets.



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## 4.0 GENERAL ARRANGEMENTS

### 4.1 Sustainability Framework

Lucy Group takes a broad-based approach to sustainability and recognises the value of utilising international frameworks and standards which it can adapt and apply to its sustainability approach. The Group has adopted the United Nations' Sustainable Development Goals (SDGs) as an appropriate framework to implement and communicate its sustainability policy, strategy and approach. The SDGs are a collection of 17 interlinked Global Goals that were adopted by all United Nations Member States in 2015 to help achieve a sustainable and brighter future for all. By adopting a balanced approach across social, economic and environmental sustainability, the UN's aim is to end poverty, protect the planet and ensure peace and prosperity by 2030. The SDGs have been globally adopted by businesses, local authorities and many other organisations.

Lucy Group understands and recognises the importance of all SDGs. However, to provide focus and deliver improvements, the Group has chosen to prioritise some SDGs to focus on initially. These priority SDGs resonate with the Group's approach and purpose; we believe the Group can make the most significant contribution while indirectly supporting others. To ensure continual improvement, we will measure our progress and will, when practicable, widen the focus to further SDGs.

### 4.2 Reporting and Compliance


Lucy Group ensures transparency in all aspects of its business and will comply with all current and future Government directives and legislation for reporting. The Group will meet its obligation to satisfy the requirements of sectoral governing bodies while disclosing information for certification, validation, or to demonstrate best practice. Reports will follow the prescribed format or reference internationally recognised reporting structures such as the Global Reporting Initiative (GRI), the Task Force on Climate Related Financial Disclosures (TCFD) and Greenhouse Gas Protocol (GHGP). Alongside our CSR reporting, Sustainability performance will be included in the Group's annual report, which is made available to the public on the Lucy Group website.

### 4.3 Emission Reduction

The Group has been reporting its Scope 1 and 2, as well as its currently quantifiable Scope 3, emissions in line with the GHG Protocols since 2019. The Group is committed to establishing how it can reduce its carbon emissions in line with the goal set by the Intergovernmental Panel on Climate Change (IPCC) to limit global warming to well below 2°C (preferably to 1.5°C) compared to pre-industrial levels by 2050. The Group will utilise recognised strategies and methodologies to establish and measure current emissions and set short, medium and long term reduction targets.

### 4.4 Monitoring and Measuring

Lucy Group will monitor and measure its progress against set targets and key performance indicators (KPI) to drive priorities, performance and deliver continual improvement in all business activities. External sustainability

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indexes are utilised to establish baselines and measure progress, where appropriate, with performance discussed during management meetings and included in Board reports.

#### 4.5 Communication

Lucy Group has established a culture of inclusivity and seeks contribution by encouraging discussion with employees, customers, and the supply chain in progressing our sustainability ambitions. We will seek external partners and open dialogue with specialist organisations to advance sustainable practices and drive continual improvement.

This policy will be promulgated in suitable locations within each business and made available on the Group's intranet and website. Employees will be informed of the contents of this policy during induction and refresher training, with records of attendance retained. Stakeholders can request copies of this policy from any Lucy Group business.

#### 4.6 Supporting Documents

Lucy Group demonstrates its commitment to Human Rights, Corporate and Social Responsibility, Health & Safety, Environment and Anti-corruption by publishing individual policies to ensure legislative conformance and meet stakeholder expectations. Sustainability considerations are identified and included in all policies and management systems to provide a holistic approach to continual sustainable improvement.