



ESG Policy

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Process Owner	Chief Financial Officer

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Scope:

This policy applies to Easby Group Topco Ltd, known hereafter as Easby Group, Reg number 13883535, and its subsidiaries, Easby Group Midco Ltd (13885055), Easby Group Bidco Ltd (13887944), Easby Electronics Ltd (01537952), Delta Impact Ltd T/A Delta Matrix (02273501), which is a privately owned limited business headquartered in Catterick Garrison, United Kingdom. Operations are based in United Kingdom and Hong Kong, primarily serving customers in the UK and Europe. All reporting data is consolidated at group level for all reported entities to provide a holistic view of Easby Group and ensure inclusion of any acquisition or divestments and allows minority or remote entities to be fully captured within the reporting period.

Review Cycle: Annually. Where possible this should align with financial reporting to UK Companies House, unless this is not possible for an unforeseen reason(s).

1. Environmental Responsibility

As a non-manufacturing distributor, our direct environmental impact is modest. However, we are committed to reducing our footprint and promoting sustainability through responsible operations and partnerships.

Key Commitments:

- **Carbon Reduction Targets:**
 - Reduce Scope 1 and 2 emissions by 5% year-on-year (YoY) through energy efficiency, logistics optimisation, and supplier engagement.
 - Collaborate with logistics partners to explore low-emission delivery options and carbon offsetting.
- **Energy Efficiency in Leased Spaces:**
 - Work with landlords to implement energy-saving measures such as LED lighting, smart thermostats, and efficient HVAC systems.
 - Promote green office practices, including switching off equipment after hours and reducing unnecessary energy use.
- **Sustainable Commuting:**
 - Encourage cycle-to-work schemes, carpooling, and public transport incentives.
 - Explore the feasibility of EV charging stations in partnership with landlords.
- **Waste Reduction:**
 - Implement comprehensive recycling programs for packaging, electronics, and office waste.
 - Eliminate single-use plastics in office kitchens and promote reusable alternatives.
- **Sustainable Procurement:**
 - Prioritise suppliers with strong environmental credentials and certifications (e.g. ISO 14001).
 - Encourage suppliers to adopt circular economy principles and reduce packaging waste.

2. Social Responsibility

We are committed to supporting our employees, engaging with our local communities, and fostering a diverse and inclusive workplace.

Key Commitments:

- **Community Engagement:**

- Donate surplus or refurbished electronics to digital inclusion programs and local charities.
- Organise employee volunteering days with local non-profits and community initiatives.
- Support local causes through fundraising, donation matching, and sponsorships.
- **Employee Wellbeing and Engagement:**
 - Provide a safe, inclusive, and engaging on-site work environment.
 - Offer on-site wellness programs, such as yoga sessions, mental health workshops, and healthy snack options.
 - Recognise and reward employee contributions to ESG initiatives.
- **Diversity & Inclusion:**
 - Maintain a zero-tolerance policy on discrimination and harassment.
 - Promote diversity in recruitment, leadership, and supplier selection.
- **Employee-Led ESG Initiatives:**
 - Establish an internal ESG committee to lead sustainability and community projects.
 - Encourage staff to propose and lead local impact initiatives.

3. Governance and Ethical Conduct

We uphold the highest standards of integrity, transparency, and accountability in all our business dealings.

Key Commitments:

- **Ethical Business Practices:**
 - Enforce a strict anti-bribery and corruption policy.
 - Provide regular training on ethical conduct, data protection, and compliance.
- **Transparency and Reporting:**
 - ESG Targets will be reviewed and reported internally at least annually. Future development of this policy will see a public report being issued, however at the moment this is not currently available.
 - Maintain open communication with stakeholders on ESG matters.

4. Supply Chain Resilience

As a distributor, our supply chain is central to our business. We are committed to building a resilient, ethical, and sustainable supply network.

Key Commitments:

- **Supplier Due Diligence:**
 - Conduct regular assessments of suppliers for ESG compliance, including labour practices and environmental impact.
 - Require suppliers to adhere to our Supplier Code of Conduct.
- **Risk Management:**
 - Diversify sourcing to reduce dependency on single regions or vendors.
 - Monitor geopolitical, environmental, and economic risks that could impact supply continuity.
- **Collaboration and Innovation:**
 - Work with suppliers to improve sustainability practices and share best practices.
 - Encourage innovation in packaging, logistics, and product lifecycle management.

Monitoring and Reporting

- ESG performance will be reviewed biannually by the ESG Committee.
- Annual ESG goals and progress will be published internally, and where available, in our externally facing report.
- Feedback from employees, customers, and partners will be actively sought to improve our ESG strategy.
- For any reporting concerns, please reach out to Andy.Tompkins@Easby.com
- Currently, our ESG policies are being aligned to the GRI standards, but we make no claim to be fully aligned, and instead we consider to be “working towards” alignment. We have no external verification or certification to any recognised standard.

Employees: -

The organization shall:

- Report internally the total number of employees, and a breakdown of this total by gender and by region;
- Report internally the total number of:
 - permanent employees, and a breakdown by gender;
 - temporary employees, and a breakdown by gender;
 - non-guaranteed hours employees, and a breakdown by gender and by region;
 - full-time employees, and a breakdown by gender including part time as FTE equivalent
- describe the methodologies and assumptions used to compile the data, including whether the numbers are reported:
 - in head count, full-time equivalent (FTE);
- report contextual information necessary to understand the data reported under 2-7-a and 2-7-b;
- describe significant fluctuations in the number of employees during the reporting period and between reporting periods.

Appendix 1 – Version History

Date	Version	Notes on amendments	Updated by
21/10/26	1	New Document	CD