



GBG

GBG Environmental Policy

**Approved by the Board
January 2025**

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Document Owner:	Annabelle Burton
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Version	Date	Reason for Change	Approved By
1.0	7/1/20	Update from previous	James Miller
2.0	9/2/22	Update branding and added carbon footprint	James Miller
3.0	21/3/23	Refocus following net zero ambition confirmed	James Miller
4.0	January 2025	Annual review	Annabelle Burton

Environmental Policy

1. Introduction

- 1.1. GB Group plc and its subsidiaries (“GBG” or “the Group”) are global specialists in digital identity and location verification.
- 1.2. We recognise our responsibility to the environment goes beyond legal and regulatory requirements. We are committed to reducing our negative environmental impact and continually aiming to improve our environmental performance as an integral part of our business strategy and operating methods.
- 1.3. We expect our team members, customers and suppliers to share this commitment.

2. Policy Purpose

- 2.1. This objective of this Policy is to ensure Group-wide understanding of GBG’s environmental commitments.
- 2.2. The Policy will also provide guidance to team members as to how they can meet our Group commitments.
- 2.3. This Policy commits GBG to:
 - 2.3.1. Maintain Board and senior management oversight of our environmental commitments and priorities.
 - 2.3.2. Maintain Board and senior management oversight of the management of principal risks related to the environment.
 - 2.3.3. Include environmental risks into our company-wide risk identification and mitigation processes, and report on the these in our Annual Report and Accounts (“the Annual Report”).
 - 2.3.4. Ensure compliance with relevant environmental legislation.
 - 2.3.5. Continually evolve our environmental management and processes to improve environmental performance in our operations, including setting internal targets and public goals.
 - 2.3.6. Monitor and report transparently on our annual progress against any public goals.
 - 2.3.7. Engage employees on environmental issues and ensure those responsible for adhering to this Policy have the relevant skills and competencies.

- 2.3.8. Monitor external issues and public concerns relating to the environment and respond accordingly.

3. Scope

- 3.1. This Policy applies to our operations over which we have direct control – including all team members, whether permanent, fixed-term or temporary, consultants and contractors or any other person associated with GBG or any of its subsidiaries.
- 3.2. In addition, when working with partners in our value chain which are outside of our direct control, we encourage them to apply the same requirements set out in this Policy

4. Associated Policies

- 4.1. This Policy should be read in conjunction with:
 - 4.1.1. Supplier Code of Conduct
 - 4.1.2. Code of Conduct
 - 4.1.3. Carbon Reduction Plan

5. Policy Ownership

- 5.1. GBG's Board of Directors (“the Board”) approve this Policy. The Group Company Secretary is the officer responsible for the Policy. The ESG Programme Manager carries responsibility for Policy implementation, with assistance from the workplace experience team. However, all team members have a responsibility to ensure that the aims and objectives of the Policy are met.

6. Greenhouse Gas Emissions and Energy Use

- 6.1. We **commit to** publicly report on our Greenhouse Gas emissions annually in line with the Greenhouse Gas Protocol.
- 6.2. We aim to reduce carbon emissions in line with the goals of the Paris Agreement and Science-Based carbon emission reduction targets.
- 6.3. We prioritize the use of renewable energy sources for our operations where possible, including our offices and third-party data centres we utilise.
- 6.4. We commit to operate with a cloud-first approach to minimise emissions from physical data centres and to reduce energy use across our value chain.

- 6.5. We implement energy-saving measures in our offices, such as energy-efficient lighting, equipment, and encouraging practices that reduce energy consumption.

7. Waste Management

- 7.1. We ensure responsible disposal and recycling of electronic waste through e-waste recycling initiatives wherever safe and possible to do so.
- 7.2. We minimise office waste by promoting digital documentation, recycling paper, and reducing single-use plastics.
- 7.3. We promote and facilitate the waste hierarchy (reduce, reuse, recycle).

8. Sustainable Procurement

- 8.1. Our Supplier Code of Conduct sets out minimum expectations in respect of supplier behaviours, commitments and integrity with regards to ESG topics. It is important to GBG that our suppliers understand and align with these standards.
- 8.2. We aim to partner with suppliers who share our commitment to environmental sustainability and adhere to responsible environmental practices.

9. Water Conservation

- 9.1. We ensure to promote water conservation practices within our office spaces.
- 9.2. We endeavour to work with third party data centres that have responsible water use practices in place and prioritise conservation of resources.
- 9.3. We commit to operate with a cloud-first approach to maximise efficiency from water use during physical data centre cooling.

10. Biodiversity Protection

- 10.1. We will support initiatives that protect and restore natural habitats and ecosystems where appropriate and possible.
- 10.2. We aim to reduce our impact on biodiversity from chemicals by being conscious of the cleaning products use in our offices.

11. Team Member Engagement and Training

- 11.1. We endeavour to conduct regular training and awareness programs to educate team members about environmental issues and sustainable practices.
- 11.2. To effectively communicate our sustainability strategy to our team members, suppliers, customers, and partners, we will issue a standalone Impact Report annually, which will be available on the GBG website.
- 11.3. To further enhance awareness of our responsibilities and commitments, we will maintain a dedicated internal resource area, providing all team members with access to information and news.
- 11.4. Additionally, both team members and third parties can report any environmental concerns through the Group Company Secretary, ESG Programme Manager, or via the Whistleblowing Procedure.

12. Governance and Reporting

- 12.1. The ESG Committee oversees the development of the ESG strategy, makes recommendations to the Board, establishes objectives and targets for the Group's ESG activities, and monitors the measurement and reporting of performance against these targets.
- 12.2. We have established an Impact Committee, comprised of senior team members and key internal stakeholders, to provide leadership and oversight to ensure that sustainability, social responsibility, and impact objectives are considered in business decisions, operational processes, and cultural norms across the Group.
- 12.3. We comply fully with all applicable environmental legislation and regulation – striving to go beyond legal compliance.
- 12.4. We commit to regularly review and update our environmental policy to reflect new insights, technologies, and best practices.
- 12.5. We aim to foster a culture of innovation to continuously improve our environmental performance.

13. Policy Requirements

- 13.1. Team members must ensure they read, understand and comply with the information contained within this Policy.
- 13.2. Team members must complete any training and, where applicable acknowledge any additional information they are given on the subject matter.