
	<p>BRUSH Group Sustainability Policy</p>	Document Number	BRUSH-ESG/BPL/001
		Issue	B

Department	Sustainability	Approver	Stephanie Woodmass	Signature		Classification	Unrestricted
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BRUSH GROUP

Sustainability

Policy

The BRUSH GROUP Sustainability Policy must be followed by anyone who works for or represents BRUSH, including directors, officers, employees, agents, distributors, and business associates working for or on behalf of any BRUSH entity, including, but not limited to BRUSH Group Ltd., together with its subsidiaries and affiliates ("the Group").

Employees must gain an understanding of the **Sustainability Policy** and ensure that its principles are fully applied in relevant areas of their job role.

Purpose of this policy

The purpose of this policy is to make clear to all BRUSH staff what is meant by Sustainability and how we propose to work towards achieving it. The policy applies to all BRUSH activities and governs BRUSH's approach to ESG and sustainability.

Sustainability Policy Statement

BRUSH is committed to integrating environmental sustainability, social responsibility, and effective corporate governance into all aspects of our business. This Policy Statement is aligned with the 10 principles of the UN Global Compact and the 17 UN Sustainable Development Goals, reflecting our commitment to improving sustainability within the Group.

We expect this Policy Statement to be upheld by all employees, including the Executive Team.

As we look ahead to the future, we will continue to be transparent and remain focused on expanding our sustainability efforts.

ENVIRONMENTAL SUSTAINABILITY COMMITMENTS:

- Reducing our impact on climate change, conserving natural resources and operating in compliance with environmental regulations.
- Supporting the 2015 Paris Climate Accord ambition to limit the temperature increase to 1.5 degrees Celsius above pre-industrial levels and are committed to becoming a Net Zero business by 2050 at the latest.
- Committed to the Science-Based Targets initiative.
- Maintaining an effective environmental management system in all our manufacturing sites.
- Reducing the amount of waste we generate and send zero waste to landfill by 2030.
- Reducing the impact of our products across their life cycle.

SOCIAL RESPONSIBILITY COMMITMENTS:

- Being a socially responsible employer by fostering an environment of diversity and inclusion.
- Empowering women and minorities across the business.
- Supporting the local communities in which we operate.
- Working with our supply chain to identify and effectively eliminate any form of forced or child labour.
- Providing safe and secure workplaces for all our employees.

CORPORATE GOVERNANCE COMMITMENTS:

- We believe strong corporate governance is the foundation to delivering on our commitments.
- Building a culture dedicated to ethical business behaviour and responsible corporate activity.
- Delivering effective training for all our employees to ensure that the company's policies and procedures are implemented and adhered to.
- Ensuring all our employees understand their responsibilities through the provision of adequate information, instruction, and training.

Please refer to Appendix A for a non-exhaustive list of sustainability initiatives that have been implemented by BRUSH.

Please refer to Appendix B for a non-exhaustive list of sustainability initiatives that will be implemented by BRUSH.

Appendix A: BRUSH Group's current sustainability initiatives

Non-exhaustive list of sustainability initiatives that have been implemented by BRUSH Group:

ENVIRONMENTAL INITIATIVES:

- BRUSH Group have committed to the UN Global Compact.
- BRUSH Group have committed to the Science-Based Targets initiative.
- BRUSH Group measure our sustainability performance through EcoVadis and have subsequently been awarded a Bronze medal.
- BRUSH Group measure activity data as KPIs to monitor environmental impact reduction.
- BRUSH Group has a comprehensive Environmental Management Strategy.
- BRUSH Group measure scope 1, 2, and 3 emissions (verified by an independent third-party) on an annual basis and track reductions over time.
- BRUSH Group have set a Zero Waste to Landfill by 2030 goal.
- BRUSH Group measure and monitor energy use, water use and waste metrics and actively identify areas for improvement.
- BRUSH Group have begun to implement Carbon Literacy training.
- BRUSH Group have begun to measure the embodied emissions of our products through the CIBSE TM65: 2021 methodology.
- BRUSH Group participate in ESOS reporting and have implemented energy savings initiatives such as LED and sensor lighting.
- BRUSH Group have introduced a rewilding area at one of our manufacturing locations in the UK to encourage local biodiversity enhancement.
- BRUSH Group procure renewable energy at our Hawtin Park manufacturing site.
- BRUSH Group ensure sustainable procurement through the implementation of our Sustainable Procurement Policy.
- BRUSH Group review environmental policies on an annual basis and update accordingly.
- BRUSH Group communicate with stakeholders to determine environmental priorities and focus areas.
- BRUSH Group are signatories of the Powering Net Zero Pact, developed by SSE, to collaborate with industry leaders on sustainability best practice.

SOCIAL INITIATIVES:

- BRUSH Group have created an Employee Sustainability Feedback Form where our colleagues can suggest their sustainability ideas to the team in order to promote collaboration.
- BRUSH Group have taken actions to benchmark and measure our workforce diversity.
- BRUSH Group have implemented the Bike2Work scheme to encourage colleagues to utilise sustainable commuting options and improve health and wellbeing.
- BRUSH Group have created an internal Sponsorship Committee to give back to the local communities we operate within.
- BRUSH Group fosters an environment of diversity and inclusion through the implementation of our Group Equality and Diversity Policy.
- BRUSH Group ensure sustainable procurement through the implementation of our Modern-Day Slavery Statement and our Sustainable Procurement Policy.
- BRUSH Group have created an internal Wellbeing Committee.
- BRUSH Group review social policies on an annual basis and update accordingly.
- BRUSH Group communicates with stakeholders to determine social priorities and focus areas.
- BRUSH Group engages heavily with apprenticeship programmes to enhance the skilled workforce in local communities.
- BRUSH Group have implemented a 'Just Transition' policy.

Appendix B: BRUSH Group's planned sustainability initiatives

Non-exhaustive list of sustainability initiatives that will be implemented by BRUSH:

ENVIRONMENTAL INITIATIVES:

- BRUSH Group will create and publish a Carbon Reduction Plan encompassing all aspects of our operations in 2025. This will be reviewed and updated on an annual basis.
- BRUSH Group will set Science-Based Targets within the 24-month period from commitment.
- BRUSH Group will look to register with the Carbon Disclosure Project and submit data in 2026.
- BRUSH Group will implement specific policies focusing on Energy, Water, Waste, and Biodiversity in 2025.
- BRUSH Group will continue to upgrade equipment and machinery to more energy-efficient models.
- BRUSH Group will continue to replace high-emission vehicles with EV alternatives, where feasible.
- BRUSH Group will transition towards a paperless or digital office environment, minimising packaging, promoting reusable products, and implementing robust paper recycling programs.
- BRUSH Group will develop a Business Climate Adaptation Strategy in 2025.
- BRUSH Group will continue to research and design sustainable and innovative products, services, and solutions.

SOCIAL INITIATIVES:

- BRUSH Group will continue to choose local supply chains, where feasible, to increase local opportunities and decrease emissions associated with procurement.
- BRUSH Group will create a 'Just Transition' policy to outline our commitment to sustainable development in 2025.
- BRUSH Group will look to measure our Social Value Impact and will implement improvement initiatives to be monitored on an annual basis.