
	<p style="text-align: center;">BRUSH Group Sustainability Policy</p>		Document Number	BRUSH-ESG/BPL/001
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TRUST. WELL EARNED.

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.

1.0 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.

2.0 Sustainability Policy Statement

BRUSH is committed to integrating environmental sustainability, social responsibility, and effective corporate governance into all aspects of our business. Sustainability is defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs” by the UN Brundtland Commission (1987). 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. As we look ahead to the future, we will continue to be transparent and remain focused on expanding our sustainability efforts. We expect this Policy Statement to be upheld by all employees, including the Executive Team.

ENVIRONMENTAL SUSTAINABILITY OBJECTIVES

- 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.
- Committed to becoming a net zero business by 2050.
- Committed to the Science-Based Targets initiative.
- Maintaining an effective environmental management system at all our manufacturing sites.
- Reducing the amount of waste we generate and sending zero waste to landfill at all BRUSH UK-based manufacturing sites under our operational control by 2030.
- Reducing the impact of our products across their life cycle.

SOCIAL RESPONSIBILITY OBJECTIVES

- 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 suppliers to identify and effectively eliminate any form of forced or child labor.
- Providing safe and secure workplaces for all our employees.

CORPORATE GOVERNANCE OBJECTIVES

- Building a culture dedicated to ethical business behaviour and responsible corporate activity.
- Ensuring all employees understand their responsibilities through the provision of adequate information, instruction, and training, making sure that policies and procedures are adhered to.

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 BRUSH are planning to implement.

Appendix A: BRUSH Group's current sustainability initiatives

ENVIRONMENTAL INITIATIVES

BRUSH Group are:

- committed to the Science-Based Targets initiative (SBTi), striving to achieve Net Zero by 2050 at the latest, and supporting the 2015 Paris Climate Accord ambition to limit global temperature increase to 1.5 degrees Celsius above pre-industrial levels,
- committed to The UN Global Compact (UNGC),
- aligned with The UN Sustainable Development Goals (SDGs),
- maintaining ISO 14001 certification across UK-based entities,
- members of SSE's Powering Net Zero Pact,
- committed to sending zero waste to landfill by 2030 at BRUSH UK-based manufacturing sites,
- instilling waste-positive behaviours amongst our workforce by providing training (where necessary) and clear communications on proper waste segregation,
- measuring our sustainability performance through EcoVadis and maintaining our bronze medal,
- Internally measuring our sustainability performance and identifying areas for improvement through collecting KPI data on material sustainability topics including energy use, water use and waste metrics,
- measuring our scope 1, 2 and 3 emissions on an annual basis and obtaining carbon footprint verification from an independent third-party,
- tracking decarbonisation performance on an annual basis,
- compliant with the UK's Streamlined Energy and Carbon Reporting (SECR) regulation,
- compliant with the UK's Energy Savings Opportunity Scheme (ESOS) regulation and implementing energy efficiency measures within our buildings such as LED and sensor lighting,
- procuring renewable electricity at our Transformer and Switchgear sites,
- procuring lower emission biomethane-based gas at our Transformer and Switchgear sites,
- offering Carbon Literacy Training to our colleagues,
- measuring the embodied emissions of selected products using the UK Transmission Operator Carbon Product Calculator from BEAMA,
- asking key suppliers to respond to our annual supplier sustainability questionnaire to obtain data on suppliers' carbon emissions, product environmental impact, and sustainable governance mechanisms,
- maintaining the rewilding area at our Transformers site to enhance local biodiversity,
- utilising our sustainability committee to collaborate on decarbonisation initiatives,
- embedding sustainable procurement principles through the implementation of our Sustainable Procurement Policy,
- communicating with stakeholders to determine environmental priorities and focus areas,
- reviewing environmental policies and plans as required and updating these accordingly.

SOCIAL INITIATIVES

BRUSH Group are:

- embedding our employee sustainability feedback form to facilitate collaboration,
- measuring our workforce diversity,
- paying the Real Living Wage,
- offering the UK EV salary-sacrifice scheme,
- engaging heavily with apprenticeship programmes and other early career pathways to enhance the skilled workforce in local communities,
- utilising our internal sponsorship committee to give back to the local communities we operate within,
- utilising our internal Wellbeing Committee to promote healthy lifestyles,

- offering the Bike2Work scheme to encourage colleagues to utilise sustainable commuting options and improve health and wellbeing,
- running an annual sustainability week to increase collaboration on sustainability topics,
- communicating with internal and external stakeholders to determine priorities and focus areas for social sustainability,
- embedding green justice principles through the implementation of our Just Transition Policy,
- fostering an environment of diversity and inclusion through the implementation of our Group Equality, Diversity and Inclusion Policy,
- communicating our zero-tolerance approach to modern slavery to all suppliers, contractors, and business partners at the outset of a business relationship and reinforced as appropriate thereafter,
- upholding the principles outlined in BRUSH Group's Code of Ethics Policy covering topics including, but not limited to: bribery and corruption, gifts and hospitality, conflicts of interest, money laundering, competition, trading sanctions, data privacy, document retention, joint ventures, human trafficking and modern slavery, human rights, ethical sourcing and conflict minerals, tax evasion, fraud, diversity and inclusion, health and safety, and whistleblowing,
- reviewing social policies as required and updating these accordingly.

Appendix B: BRUSH Group's planned sustainability initiatives

BRUSH Group plan to:

- develop a carbon reduction plan to outline our journey to net zero,
- further investigate climate adaptation initiatives to safeguard the business against the impacts of climate change,
- investigate the feasibility of water-efficiency measures at our sites,
- collaborate with stakeholders to better understand how to advance fleet decarbonisation,
- further investigate opportunities for resource circularity including the procurement of materials with recycled content and the reuse of salvageable materials to promote high levels of material reuse/ recycling at product end-of-life,
- further investigate options for local procurement to reduce emissions associated with the delivery of products to our sites, where feasible,
- collaborate further with our suppliers to help facilitate their emissions measurement and improvement,
- measure our corporate 'social value' on an annual basis and identify opportunities for improvement.