

PRO ENVIRO LIMITED

Environmental, Social and Governance (ESG) Policy

Energy Engineering, Sustainability and Decarbonisation Consultancy

1. Purpose and Scope

Pro Enviro Limited ('the Company') is a leading energy engineering, sustainability and decarbonisation consultancy committed to operating responsibly, ethically and sustainably across all aspects of its business. We recognise that our actions have a direct impact on our clients, employees, supply chain, communities and the natural environment.

This Environmental, Social and Governance (ESG) Policy sets out the Company's commitment to conducting business in a manner that creates long-term value for all stakeholders whilst minimising harm and maximising positive contributions to society and the environment. This Policy applies to all employees, directors, contractors and suppliers operating on behalf of Pro Enviro Limited.

2. Policy Statement

Pro Enviro Limited is proud to hold B Corporation (B Corp) certification, to have set Science Based Targets (SBTi) for emissions reduction, to be certified to ISO 9001:2015 for Quality Management Systems, and to be a signatory to the United Nations Global Compact. These commitments underpin our entire approach to corporate responsibility and reflect our belief that business can and must be a force for good.

We embed responsible business practices into our strategy, governance, operations and culture. Our ESG framework is structured around five core pillars:

- Environmental Stewardship
- Social Value and Community
- Ethical Governance and Integrity
- Our People and Workplace
- Client and Supply Chain Responsibility

3. Pillar 1 – Environmental Stewardship

As an energy engineering, sustainability and decarbonisation consultancy, Pro Enviro Limited holds itself to the highest standards of environmental performance. We believe that addressing the climate and ecological emergency is not merely a regulatory obligation but a moral imperative and a commercial opportunity.

3.1 Climate and Net-Zero

We are committed to achieving net-zero greenhouse gas emissions across our entire value chain. Our Science Based Targets (SBTi) commitments ensure that our emissions reductions align with the 1.5°C pathway as defined under the Paris Agreement. Our targets cover Scope 1, Scope 2 and material Scope 3 emissions.

- Annually measure, verify and publicly disclose our greenhouse gas inventory in accordance with the GHG Protocol.

- Reduce absolute Scope 1 and 2 emissions by at least 46.2% by 2030 against our 2019 baseline.
- Engage our supply chain to set decarbonisation targets
- Achieve a reduction of 90% of our Scope 3 carbon emissions from the baseline year of 2019, no later than 2035.
- Reduce absolute Scope 1 and 2 emissions by 100% by 2035

3.2 Energy Efficiency and Renewables

Reducing the energy we consume and ensuring that the energy we do use is drawn from renewable sources is central to lowering our operational emissions. We treat energy efficiency as the first priority and procure certified renewable energy to meet our remaining demand.

- Procure 100% renewable electricity for our offices, backed by Renewable Energy Guarantees of Origin (REGO) certificates. REGOs are issued by Ofgem and evidence that each megawatt-hour of electricity supplied to us has been generated from an eligible renewable source.
- Monitor and review our energy consumption, using the data to identify and prioritise further efficiency improvements.
- Promote energy-conscious behaviours across our team, including reducing standby loads and switching off equipment when not in use.

3.3 Biodiversity

We recognise the interdependence of climate stability and biodiversity and are committed to minimising our negative impacts and enhancing biodiversity wherever we can. This commitment shapes how we source products and services and the culture we build across our team.

- Not engage in any practices that threaten biodiversity and ensure that any products or services we source uphold high environmental standards.
- In line with our Sustainable Procurement Policy, use sustainable products wherever possible and always choose the most sustainable option available — for example, paper and cleaning products, as well as switching from printed marketing material to digital display boards.

Through the work we do with our clients, we are passionate individuals who care about climate action and see opportunities to drive change within organisations. We contribute to meaningful environmental change and empower our clients to take action, with the overall aim of reducing our clients' environmental impact and demonstrating our commitment to sustainability.

3.4 Waste and Circular Economy

As an energy engineering, sustainability, and decarbonisation consultancy, we place resource efficiency and process optimisation at the heart of what we do. We apply the same circular-economy thinking to our own operations that we bring to our clients. We aim to design waste out of our activities, prioritising prevention, reuse and recycling over disposal and to treat materials as resources to be kept in use for as long as possible.

- Monitor recycling and waste-to-landfill rates, with the aim of eliminating waste-to-landfill by 2027.
- Prioritise the reduction, reuse and recycling of materials, applying the waste hierarchy to our purchasing and disposal decisions.
- Minimise single-use plastics and non-recyclable packaging throughout our operations, and work with suppliers and service providers to reduce packaging at source.

- Extend the life of IT and office equipment through repair, refurbishment and responsible reuse, and dispose of end-of-life electronics through certified WEEE recycling channels.
- Reduce paper consumption by defaulting to digital documents, records and marketing materials.

4. Pillar 2 – Social Value and Community

Pro Enviro Limited is committed to generating measurable social value in the communities in which we operate. We believe that a just transition to a net-zero economy must benefit all members of society, not just those with existing access to resources and capital.

4.1 Community Engagement

Our roots are in helping organisations improve their environmental performance, and we extend that purpose into the communities where we live and work, particularly across Rugby, Warwickshire and the wider West Midlands. We believe the transition to net zero should be accessible to businesses of all sizes, and we use our expertise to broaden that access.

- Support small and medium-sized enterprises (SMEs) and local businesses on their decarbonisation journeys, including through business-support programmes that help them access energy assessments, funding and practical guidance.
- Share knowledge freely with the wider business community through resources, events and practical energy-saving guidance.
- Contribute to green skills development, helping to build the low-carbon workforce that a just transition requires.
- Commit to ongoing charitable giving and community investment.
- Continue and increase participation in our staff volunteering programme, giving employees the opportunity to volunteer for environmental or social causes.

4.2 Inclusive and Just Transition

We are committed to ensuring that our work actively promotes a fair and inclusive transition to a sustainable economy. This includes advocating for policy frameworks that protect vulnerable communities, supporting energy access initiatives and promoting green skills development.

4.3 Modern Slavery and Human Rights

We maintain a zero-tolerance approach to modern slavery, human trafficking, forced labour and child labour in any form. We conduct due diligence across our supply chain to identify and address human rights risks and publish an annual Modern Slavery Act Transparency Statement in accordance with the Modern Slavery Act 2015. We are committed to the principles set out in the UN Guiding Principles on Business and Human Rights.

5. Pillar 3 – Ethical Governance and Integrity

Pro Enviro Limited is committed to the highest standards of ethical conduct in all business dealings. Our membership of the UN Global Compact commits us to upholding its Ten Principles relating to human rights, labour standards, the environment and anti-corruption.

5.1 Anti-Corruption and Bribery

- Maintain a strict zero-tolerance policy towards bribery and corruption in all its forms.
- Comply fully with the Bribery Act 2010 and all applicable anti-corruption legislation.
- Ensure all staff complete mandatory anti-bribery and corruption training upon induction and annually thereafter.
- Maintain gifts register and apply clear thresholds for acceptance and disclosure.

5.2 Data Protection and Privacy

We are committed to protecting the personal data of clients, employees and all individuals with whom we interact, in full compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We treat data as a matter of trust and handle it with care, transparency and integrity.

5.3 Transparency and Reporting

We are committed to transparent, accurate and timely reporting of our ESG performance. We will publish an annual ESG and Sustainability Report aligned with recognised frameworks including Carbon Reduction Plan (CRP), B Corp Impact Assessment disclosure requirements and our SBTi progress report. We will not engage in greenwashing and will ensure all environmental claims are substantiated and verifiable.

5.4 Whistleblowing

We maintain a confidential whistleblowing procedure that enables any employee, contractor or third party to raise concerns about unethical conduct, breaches of this Policy or suspected wrongdoing without fear of retaliation. All concerns will be investigated promptly and impartially.

6. Pillar 4 – Our People and Workplace

Our employees are the foundation of everything we do. We are committed to providing a workplace that is safe, inclusive, fair and fulfilling, where every individual can thrive and contribute to our mission.

6.1 Health, Safety and Wellbeing

- Comply with all relevant health and safety legislation, including the Health and Safety at Work etc. Act 1974 and associated regulations.
- Maintain a wellbeing programme addressing physical and mental health.
- Conduct regular risk assessments and ensure all employees receive appropriate training.
- Target a reportable accident-free record and review health and safety performance annually.

6.2 Equality, Diversity and Inclusion (EDI)

Pro Enviro Limited is an equal opportunities employer. We are committed to building a diverse and inclusive workforce that reflects the communities we serve and leverages a broad range of perspectives and experiences. We will not tolerate discrimination, harassment or victimisation on the grounds of any protected characteristic as defined by the Equality Act 2010.

- Set and report against measurable diversity and inclusion targets at Board and senior leadership level.
- Foster an inclusive culture.

6.3 Fair Pay and Conditions

We are committed to paying fair wages and always pay at or above the Real Living Wage as calculated by the Living Wage Foundation (formal accreditation will be sought in 2026). We support flexible working arrangements and are committed to promoting work-life balance for all employees.

6.4 Learning and Development

We invest in the professional development of our people, recognising that a knowledgeable, skilled team is central to delivering excellence in sustainability consultancy. All employees have a skills development plan.

7. Pillar 5 – Client and Supply Chain Responsibility

7.1 Responsible Client Work

We are committed to providing honest, evidence-based and impactful sustainability advice that enables our clients to achieve genuine and measurable progress. We will not undertake work that materially conflicts with our environmental or ethical values and reserve the right to decline client engagements that are incompatible with our purpose.

7.2 Supply Chain Standards

We expect all suppliers and subcontractors to operate to standards consistent with this Policy. Our Supplier Code of Conduct sets expectations regarding environmental performance, labour standards, health and safety, ethical conduct and data protection.

- Conduct supplier due diligence proportionate to the value and risk profile of each engagement.
- Prioritise suppliers that are B Corp certified or can demonstrate credible sustainability commitments.
- Collaborate with suppliers to support their net-zero journeys.

8. Standards, Frameworks and Commitments

Pro Enviro Limited's ESG approach is informed by and aligned with the following internationally recognised standards and frameworks:

- B Corp Certification: We meet the highest standards of social and environmental performance, accountability and transparency as independently verified by B Lab.
- Science Based Targets initiative (SBTi): Our emissions reduction targets are independently validated as consistent with limiting global warming to 1.5°C.
- ISO 9001:2015: Our Quality Management System ensures consistent, high-quality service delivery and continuous improvement across all operations.
- UN Global Compact: As a signatory, we are committed to upholding the Ten Principles on human rights, labour, environment and anti-corruption, and to advancing the UN Sustainable Development Goals (SDGs).
- GHG Protocol: We measure and report our greenhouse gas emissions in accordance with this internationally recognised standard.
- UK Modern Slavery Act 2015: We comply with annual transparency reporting requirements and conduct supply chain due diligence.
- Equality Act 2010: We uphold the statutory protections afforded to all employees and service users.

- Bribery Act 2010: We maintain zero-tolerance policies and controls consistent with our obligations under this Act.

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9. Roles and Responsibilities

Overall responsibility for this Policy rests with the Board of Directors of Pro Enviro Limited. The Board will review and approve this Policy annually and receive quarterly updates on ESG performance against targets.

- Board of Directors: Ultimate accountability for ESG strategy, performance and reporting. Approve this Policy and set the tone from the top.
- Managing Director: Executive accountability for embedding ESG across all operations and championing the Company's sustainability mission.
- Director: Day-to-day management of the ESG programme, KPI tracking, stakeholder engagement and external reporting.
- Managers: Ensuring that direct reports understand and adhere to this Policy; identifying and escalating any concerns.
- All Employees and Contractors: Acting in accordance with this Policy, completing required training and raising concerns through appropriate channels.

10. Monitoring, Review and Continuous Improvement

Pro Enviro Limited will establish measurable key performance indicators (KPIs) for each ESG pillar, which will be tracked, reported internally on an annual basis and disclosed publicly in our annual ESG and Sustainability Report.

This Policy will be formally reviewed by the Board annually, or sooner in the event of significant changes in legislation, regulatory requirements, certification standards or material business developments. All employees will be notified of updates, and the current version will be maintained and made available to external stakeholders on request.

Pro Enviro Limited is committed to the principle of continuous improvement across all ESG dimensions. We will set targets, where applicable, learn from our performance data and actively engage our stakeholders to identify opportunities for improvement.

11. Related Policies and Documents

This Policy should be read in conjunction with the following Pro Enviro Limited policies and documents:

- Code of Ethics
- Sustainability Strategy
- Anti-Corruption and Bribery Policy
- Suppliers & Sub-Contractors Code of Conduct
- Sustainable Procurement Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Health and Safety Handbook
- Data Protection and Privacy Policy
- Modern Slavery & Human Trafficking Policy

12. Policy Approval and Sign-Off

This Policy has been approved by the Board of Directors of Pro Enviro Limited and takes effect from the date shown below.

Approved by:

Name: _____ Nersi Salehi _____ Position: Managing Director

Signature: 

Date: 20/05/2026

Approved by:

Name: _____ Diane Salehi _____ Position: Director

Signature: 

Date: 20/05/2026

