Environmental & Sustainability Policy

Scope

This policy applies to **Smart Energy Training T/A Smart Gas Training & Assessment Centre Ltd, Part of the Realise Training Group (Realise)** and all subsidiaries ("the Company"). It sets out the standards and expectations that apply across the Group and is relevant to all employees, contractors, and officers. This policy does not form part of any individual's contract of employment or terms and conditions, and the company may amend it from time to time.

Environmental policy

The policy of the Company is to conduct its operations in an environmentally sustainable manner in order to protect the environment for future generations.

In implementing its policy, we will seek to ensure:

- Compliance with relevant environmental legislation and regulation
- Prevention of pollution
- The efficient use of natural resources
- The minimisation of waste and emissions to air and water
- Environmental awareness of all employees
- Effective monitoring of environmental performance
- Continual improvement in environmental performance

The Company will set targets and objectives for the improvement of environmental management and will publish details of its environmental performance.

All employees have a role to play in care of the environment. The Company has appointed individuals to be responsible for environmental issues, and environmental responsibilities are allocated to line management throughout the organisation.

This policy will be subject to periodic review to ensure it continues to meet the Company's environmental requirements.

Sustainability Policy

1. Policy Statement

The Company is committed, in accordance with our vision, our values and culture and as part of our wider approach to respect for the laws of the relevant countries in which we operate, to sustainability. This commitment means that the Company adopts a broad and joined-up view of the impact which we have on the communities around us. We aim to adopt a more intelligent, integrated approach to our use of natural and social knowledge and financial capital in order to ensure that we help to deliver a better future for everyone.

In pursuit of this aim, the Company has developed an action plan, which sets out how we will deliver business, with and for our stakeholders, in a way that ensures sustainability is at the heart of our operations. The plan aims to ensure that the Company delivers:

- Places that benefit people – we want to create places and deliver services which enhance people's lives, which are valued by the people that they affect, which contribute to the wellbeing of the people who use them, and which are designed and built for the future. Such places should therefore be resilient to climate change and able to respond to society's changing needs.
- Public service in the public interest – we anticipate that we will be called upon, as the role of government in society changes, to support front-line public agencies and the third sector with increasing frequency and to deliver public services directly. We aim to set ourselves apart from our competition by delivering services which will benefit people directly and enable our employees to make a valuable contribution to society in their own right.
- More skills and more opportunities – we aim to add to the collective sum of human knowledge and experience, by building up the skills and knowledge of our employees and stakeholders and enabling them to make a positive contribution to society, through the sharing of knowhow and the provision of opportunities for self-improvement.
- Positive environmental impact – we want to do more than simply comply with the requirements of environmental law. We hope to make a positive and restorative contribution to the environment in every initiative we undertake and, in so doing, we will strive to use natural resources ever more efficiently, both in our own operations and on behalf of our customers.
- Sustainable growth – we aspire to build a profitable business that considers the true costs of our operations, and which still delivers sustained value for all our stakeholders. In doing so, we will continue to demonstrate leading practice in sustainable procurement and will utilise a wider range of non-financial reporting metrics in our decision-making processes.

2. Supporting Policies and Procedures

This policy is underpinned by and should be read in conjunction with a range of other company policies which have been developed to support the Company's compliance with applicable law. These policies aim to ensure that appropriate legal and ethical implications are considered at all appropriate stages within the life of the business relationship between the Company, its' Customers, its' Workforce, and our Supply Chain. The policies developed include but are not limited to:

- "Mandatory Code of Conduct for our Supply Chain"
- "Health and Wellbeing Strategy" and
- "Whistleblowing"

3. Scope of Application

This policy and the associated policies have been developed centrally and are subject to periodic review by representatives of the Company, with support from relevant business functional teams and external specialists and utilising appropriate industry publications and guidance.

This policy applies to and is intended to be binding on all persons working for the Company or on our behalf in any capacity, including directors, officers, employees, workers, agency personnel, or any other person associated with us, wherever located.

This policy will also be championed and promoted in all joint ventures where the Company does not have management control.

4. What is our Action Plan?
4.1 Activities that benefit People

- Health and Wellbeing: A healthy, happy, and safe workforce is very important to us because, when our people feel valued, they are more productive, able to embrace change, and are optimistic. Research suggests that an effective Employee Wellbeing strategy should address the key aspects of what makes up a person's wellbeing. As a result, this strategy has 5 pillars that the Company can actively support:
    - Health
    - Financial
    - Positive Workplace
    - Positive Relationships
    - Family

- Social Value: We seek to influence our supply chain to encourage them to think about their impact on the world around them and how they too can create social value. We are working to develop training modules and to deliver event days to improve the ability of organisations to enter the supply chain by educating them on the creation of the social value that we and our customers expect to see. We aim, both in our own right and through our supply chain, to:

    - Procure goods, services and works from small and medium sized enterprises (SMEs) and social enterprises
    - Work in partnership with Third Sector delivery partners
    - Create jobs and develop the skills of our workforce • Increase diversity and promote equality
    - Create opportunities for disadvantaged groups
    - Promote employee health and wellbeing
    - Support charitable activities
    - Enable access to facilities for community benefit
    - Utilise social impact bonds, where appropriate • Encourage the development of social value through our supply chain.

4.2 Public Service in the Public Interest

We will aim to deliver services in a way that benefits people, and which demonstrates the value which our employees play in society, by:

- Promoting Diversity, Equality, and Inclusion: We want everyone who works with us to feel safe, valued, trusted and included. We therefore support:

    - Diversity - We aim to recognise, respect and value the differences and uniqueness of people (by reference to seven key diversity strands: Gender, Race and Ethnicity, Disability, Age, Disadvantaged Groups, Religion and Beliefs, and Sexual Orientation) and how they contribute to the workplace and the wider world.
    - Equality – We want to create a fairer society, where everyone can participate and has the opportunity to fulfil their potential and no-one is treated less favourably because of their diversity.
    - Inclusion – We want to create a working culture which welcomes people of diverse natures, recognising the benefits that are achieved by harnessing the ideas, talents and perspectives that come from involving people from different sectors of the community.

We will do so through initiatives such as:

- encouraging to staff to join and/or support special interest groups in the workplace.
- promoting awareness, through training in relation to such issues as 'Unconscious Bias'.
- supporting initiatives such as 'Ban the Box', which aims to help offenders back into employment.

- (b) Supporting Disadvantaged Groups: We aim to create opportunities for people from disadvantaged groups, including:
    - Ex-offenders
    - Lone parents
    - Ex-service personnel
    - Persons with learning disabilities
    - Long-term unemployed
    - Persons not-in-education-or-training (NEETs)
    - Persons from areas of social deprivation

4.3 More Skills and More Opportunities

We seek to develop the skills of our employees and stakeholders by sharing know-how, providing opportunities for self-improvement, and making a positive and productive contribution to society. We believe that this will increase our capabilities, enhance relationships, and generate wider benefits by adding to society's collective pool of capacity and knowledge. By creating employment, apprenticeships, career pathways and learning opportunities we will contribute towards resolving some of society's most pressing challenges - for example, youth and long-term unemployment and rehabilitation. Our initiatives include:

- Offering work experience to young people
- Increasing the number of apprenticeships, and graduate opportunities available in our business.

4.4 Positive Environmental Impact

We recognise that environmental challenges are increasingly pressing, because of climate change approaching a tipping point. We recognise that it is no longer sufficient simply to comply with regulations or deliver on narrow and modest targets. Overall emissions of greenhouse gases need to be drastically cut (and quickly). Urgent action is also required to protect biodiversity. We are committed to lifting our ambitions and to striving to use natural resources ever more efficiently, by:

- Protecting the Natural Environment: We aim, by minimising the damage caused by our activity (through initiatives such as the sourcing of sustainable forest products) and by promoting positive enhancements (such as developing tools to manage biodiversity), to:
- (b) Reducing Carbon Emissions: We will seek to reduce our carbon emissions, by reducing energy consumption and by minimising business travel to what is appropriate and by adopting the most efficient methods.
- (d) Making Waste a Thing of the Past: We have adopted a model for efficient resource use which seeks to make waste a thing of the past by encouraging staff to apply the following principles:
    - Reduce - avoid waste in the first place by designing it out.
    - Repair - extend the usable work life of any product which would otherwise become waste.
    - Recycle – where waste cannot be reused or repaired, it should be recycled.

4.5 Sustainable Growth

We recognise that, in our fast-changing world, it is no longer possible to focus only on financial values as we seek to grow. It is now necessary to build a broader platform to measure performance that recognises wider considerations, alongside the more familiar measures of profit growth and financial success. We will seek to use new tools to assess our wider impact on the world, adjusting our strategies to accommodate a wider range of nonfinancial measures. By taking a more far-reaching approach that delivers sustainable growth, we can create more value for all of our stakeholders.

5. Responsibilities

The Board of Directors of the Company has overall responsibility for:

- the development and publication of this policy, in line with our legal and ethical obligations
- ensuring that specialist advice and guidance on the content of this policy is made available to the staff of the Smart Energy Training T/A Smart Gas Training & Assessment Centre Ltd, Part of the Realise Training Group (Realise) on demand.
- auditing compliance with this policy.

(b) Management personnel, at all levels within each Business Unit of the Company, are responsible for:

- distributing and promoting awareness of this policy to all relevant persons under their control. o
- identifying the need for and, when identified, promptly procuring appropriate training about this policy for all relevant persons under their control.
- ensuring that all relevant persons under their control understand their obligations under the law, this policy and any other relevant policies and standards adopted by the Company. o ensuring that all relevant persons under their control comply with the law, this policy and any other relevant policies and standards adopted by the Company.
- ensuring that they are informed of any material risks to compliance with and any breaches of the law, this policy and any other relevant policies and standards of the Company. o taking appropriate action to address any issues raised.

(c) Employees must:

- read and understand this policy.
- attend and participate actively in any and all training made available to them on the subject of this policy and other relevant policies and standards of the Company.
- follow the requirements of this and all other relevant Smart Energy Training policies and standards adopted by the Company in performing their duties.
- be alert for and report any activity, transaction or course of dealing which they suspect may infringe applicable law and/or any relevant policies and standards adopted by the Company, which they encounter during the performance of their duties

6. How to Raise a Concern

Any person who has any concern about any act or omission which might constitute an infringement of applicable law and/or this or any other policy of the Company is encouraged to raise the issue at the earliest opportunity, either with an appropriate member of the management team of the Company or through our Whistle-blowing process, in accordance with the Company Policy on “Whistleblowing”.

7. Protection for Persons Raising Concerns

The Company aims to encourage openness and will support any person who raises concerns, even if they turn out subsequently to be mistaken, by protecting them from any detrimental treatment (such as dismissal, disciplinary action, threats, or unfavourable treatment) as a consequence of their actions. Any such detrimental treatment should be reported using the Company's Grievance Procedure.

8. Our Response to Breaches of the Law and/or this Policy

In the event that any breach of the law and/or this policy is discovered, we will take appropriate action, which may include (but may not be limited to):

- reporting such breaches to the relevant law enforcement bodies and/or regulatory authorities.
- instituting disciplinary action against the relevant employees, which could result in dismissal for misconduct or gross misconduct.
- terminating our business relationship with other individuals and organisations.

9. Review

We will periodically review this policy and its implementation to confirm and improve its suitability and effectiveness. Any changes to this policy shall not constitute a change to the terms and conditions of employment of any person.

Version history and control

Version control number	
Version	
Last review date	
Next review date	
Policy Owner	Gregg Scott Chief Executive Officer
Signed by Chief Executive Officer	Gregg Scott Chief Executive Officer