

1. Sustainability & ESG Policy Statement

The Augean Group of companies ('Augean') provides sustainable solutions for the UK's more difficult-to-handle wastes, backed-up by industrial services and decommissioning capability for a complete end-to-end service. We are committed to operating as a sustainable and responsible business.

Since the company's inception we have sought to follow best practice in environmental stewardship, social responsibility and corporate governance and the continuous development of Environmental, Social and Corporate Governance (ESG) standards is an integral part of the business growth. This is demonstrated through our company values, policies and management systems. We have prepared an annual Corporate Sustainability Report (CSR) in which our ethos and operating practices are explained and our performance against selected criteria has been disclosed since 2005.

Our approach is not only to record and transparently report ESG performance but use this data to make balanced judgements on where performance should be modified to meet the needs of the business and demonstrate continual improvement.

Our sustainability efforts are centred on the UN Sustainable Development Goals (SDGs). This brings alignment of our strategy with globally recognised sustainability priorities. We track and report on our progress in contributing to these goals via our ongoing Sustainability, ESG, and CSR reporting regimes.

Our accredited Integrated Management System satisfies the requirements of ISO 14001 (Environmental Management System Standard), ISO 9001 (Quality Management System Standard) and ISO 45001 (Health, Safety and Welfare Management System Standard) and is audited by The British Standards Institution.

2. Responsibility

Augean will implement an ESG Committee, chaired by the Director of Corporate Stewardship and sponsored by our CEO to oversee our sustainability performance across environmental, social and governance categories.

The Committee is responsible for setting goals, tracking key metrics and ensuring accountability at the highest levels of the company and reporting on ESG performance to the Board.

3. Where does this policy apply?

This policy is applicable to all operations, employees, contractors, and working partners.

4. Our Commitment to Sustainability & ESG

We recognise the importance of carrying out our business operations in a responsible, ethical and sustainable manner and, as such, the company aims to achieve this through the commitments identified below, aligned with material ESG risk themes and factors.

We participate in the Global Real Estate Sustainability Benchmark (GRESB) Infrastructure Assessment process on behalf of our shareholders to help them identify the overall sustainability of their portfolio.

A double materiality exercise will be carried out every two years. The materiality exercise will inform the topics that are material to Augean and our stakeholders. The priority topics from the materiality exercise are provided below and set out our commitments to reducing adverse environmental and social impact and corporate governance risks.

4.1 Environmental Factors

We are committed to ensuring that the environmental impacts of our business operations are positive, and any negative impact is mitigated as far as possible.

We cultivate an innovative culture, urging our management, workforce, and the community to contribute ideas on novel approaches to fulfil our environmental commitments.

The 2024 materiality exercise identified the following topics as the most material to Augean and our stakeholders and these material topics are referenced in the Group [Health, Safety, Environment and Quality \(HSEQ\) Policy](#).

- **Pollution prevention and control.** Our Group-wide ISO 14001 certified environmental management system demonstrates our commitment for achieving legal and regulatory compliance.
- **Management of Waste and hazardous substances.** We are committed to ensuring rigorous operational controls are adopted, and monitoring systems are used to verify performance at all our sites.
- **Greenhouse Gas emissions.** We are committed to reducing carbon emissions and taking climate action.
- **Sustainable travel and transport.** We are committed to supporting and promoting sustainable travel and transport decisions.

The company will also commit to other measures to reduce environmental impacts:

- Driving resource efficiency, recycling, and supporting a circular economy.
- Sustainable water and leachate management.
- Having a positive impact on nature and biodiversity.

4.2 Social Factors

We aim to conduct our business activities in a socially responsible manner and make Augean a great place to work through the provision of a wide range of benefits to all employees and respecting their needs. We want to be a good neighbour to the communities in which we operate, and we are committed to providing excellent service to our customers.

The 2024 materiality exercise identified the following social topics as the most material to Augean and our stakeholders:

- **Employee Health, Safety & Wellbeing.** Our number one priority is the health, safety and wellbeing of our employees and third-party contractors or visitors at the facilities that we operate.
- **Labour practices.** We have identified the relevant risks associated with our operations and embedded the responsibility to respect human rights into our culture, knowledge and practices and identified the means to manage such risks through implementation of our policies.

We are keen to **engage with local communities** through our Landfill Communities Fund. From educating schools on waste management to supporting local projects and sponsoring community events, and providing employment from our local communities where possible, we are dedicated to creating positive social benefits. Additionally, we contribute monthly to local food banks, underscoring our commitment to social responsibility and community welfare.

We will develop a **social value strategy** in 2024 to define the ways that we will contribute to society and local communities.

4.3 Governance and Economy Factors

We seek to conduct all of our business activities in an honest, ethical and socially responsible manner. We are committed to acting professionally, compliantly, fairly and with integrity in our business dealings and relationships with consideration for the needs of our stakeholders including investors, employees, customers and the wider community.

The 2024 materiality exercise identified the following governance and economic factors as the most material to Augean and our stakeholders:

- **Employment and wealth generation.** We are committed to creating employment opportunities to facilitate the continual improvement and growth of the business, and will manage the number of employees, to ensure their contribution to the economic prosperity of the Group.
- **Financial viability.** We are committed to maintaining our financial stability, solvency, and long-term sustainability in the face of potential sustainability-related risks and opportunities.
- **Compliance, risk, opportunity oversight.** Effective and adequate oversight is one of the most important characteristics associated with management of ESG related issues and Augean has systems in place that record and report to the Board any ESG material incidents.
- **Ethics.** We are committed to operating in a socially responsible manner by exhibiting the highest ethical standards and we expect our suppliers and stakeholders do the same by conducting business in a manner that aligns with appropriate standards, codes of conduct and the law.

Our core values provide the framework that helps us to achieve growth. Our core values have been developed to help us to shape the way we all work together within Augean:

- Teamwork: We work better together.
- Integrity: We demonstrate that we can be trusted.
- Growth: Our business will grow in a sustainable manner.
- Excellence: We strive to achieve our ambition.
- Respect: We show we value our people and others we work with.
- Solutions: We find the best solutions for our customers.

5. Measurement and Reporting

Performance against this ESG Policy will be monitored using a variety of tools:

- Site based collation of environmental metrics related to fuel, energy and water use.
- Weekly reporting of HSEQ matters on functional 'Tuesday' calls.
- Monthly compliance reporting to Management Board.
- ESG matters are an agenda item on the Board every month.
- Annual reporting in the CSR report.
- ESG page on the company website.

The board will conduct an annual review to ensure its effectiveness and alignment with organisational policies.

6. UN Sustainable Development Goals

Augean aligns with the UN Sustainable Development Goals (SDGs), adopted by all UN Member States in 2015. The sustainability approach detailed in our ESG Strategy shows that we contribute directly or indirectly to the SDGs.

7. Policy Links

The company has several existing policies in place that are linked to this ESG Policy.

These policies can be viewed at <https://augean.co.uk/esg/> and <https://augean.co.uk/information/> and are available to all employees on the company intranet.

8. Policy Review

This Policy was adopted by Augean on 31 July 2024.

This Policy will be reviewed by the ESG Committee and the Management Board no later than every two years.

A handwritten signature in blue ink that reads "Richard Brooke".

Richard Brooke
Interim Chief Executive Officer

Issued: September 2024