

Group Policy on Environmental Social and Governance

Approved by Board 1 November 2023

1. Introduction and purpose

The Pebble Group plc (the “**Group**”) is committed to acting responsibly and considers Environmental, Social and Governance (“**ESG**”) as key factors for its long-term success. We aim to integrate ESG into our organisations activities to drive the decisions and behaviour of the Group in the context of our social responsibility, across areas such as ethics, the environment, diversity, human rights, integrity, supply chain, climate change, accountability, sustainability, values, community and transparency.

We aim to be forward-thinking and act responsibly through effective governance, minimising our environmental and social impact. Our intention is to be transparent in our approach, in our commitments and how we measure and deliver against those commitments in terms of clear targets and aspirations.

2. Our Responsibilities – who must comply with this Policy?

The Group Chief Executive Officer (“**CEO**”) has primary responsibility for establishing and maintaining proportionate and effective Environmental, Social and Governance policies and processes within the Group. Ultimately the Pebble Group Board of directors has overall responsibility for ensuring this Policy complies with our legal, regulatory, and ethical obligations, and that all those under our control comply with it.

It is the responsibility of the Senior ESG Officer to ensure effective implementation and operation of the details outlined in this policy across the Group. The Senior ESG officer will work with the divisional leads of each Group business to ensure the effective implementation of this Policy by their respective businesses and for managing the Group’s performance associated with Environment, Social and Governance.

Management at all levels are responsible for supporting the effective management of ESG and ensuring those reporting to them understand and comply with this Policy and any specific efforts that are implemented to reduce our impact on the environment and ensure that we act in a socially responsible manner, as applicable to them in their role.

All directors, officers, and employees at all levels, as well as other personnel who have the status of employees of the Group and its subsidiaries (collectively “**Group Employees**”) have to follow the requirements of this Policy (or their business’ equivalent policy and procedures) so far as they are relevant and applicable to their role and their activities. This extends to all our business dealings and transactions in all countries in which we operate.

In addition, we seek to work with business partners and others who share our values and standards and we expect them to behave consistently with the provisions in this Policy.

This Policy is directly applicable to each Group business and is supported by our Group ESG strategy. It is the responsibility of each Divisional lead to ensure that the Group goals are incorporated into their own equivalent ESG strategy to ensure that ESG is effectively managed.

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3. Questions on this Policy - who to go to for advice and guidance?

If you have questions or concerns regarding any aspect of this Policy or wish to seek guidance on its interpretation and application in a specific situation, you should raise and discuss this with your direct line manager, any member of the senior management team, or alternatively the Group Senior ESG Officer.

4. How to raise concerns and seek guidance

If circumstances arise that give you reason to pause and consider whether a proposed course of action may contravene or contradict the principles contained in this Policy, if you suspect an issue has arisen in relation to this Policy or a breach of this Policy has occurred or may occur (involving other employees or any third party), it is your duty to speak up and you are encouraged to immediately notify your manager, member of the senior management team, or your HR Department, who must in turn notify the Group Senior ESG Officer.

Alternatively, you can report it through our Group Whistleblowing Portal:

<https://thepebblegroup.integrityline.com/>.

Employees will receive the Group's full support when raising any such concerns.

Managers have a responsibility to encourage staff to speak freely and report any suspicion of inappropriate, unethical or illegal behaviour by another Group Employee or anyone else connected with our businesses.

5. Policy Statement

The Group is committed to conducting its business in a responsible and sustainable manner that creates value for its stakeholders. We aim to integrate ESG considerations into our overall strategy, operations, and culture, and to report on our progress and performance in a transparent and accountable way. We will communicate at least annually on our progress against our commitments and targets. This Policy is supported by our ESG Strategy Document.

Our four cornerstones represent the ESG categories that are most important and relevant to our Group. These cornerstones form the foundation of our ESG strategy and action plan that is aimed at reducing our environmental impact, retaining existing talent and attracting new talent into our organisation, supporting our local communities and acting responsibly.

We will ensure that ESG related policies and processes are developed and maintained to support all aspects of ESG across the Group in line with our four ESG cornerstones. Each Group business is expected to allocate clear responsibilities and duties for all aspects of ESG within their business and effectively communicate with their employees to ensure that all of our commitments are understood and prioritised.

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Advancing sustainability

Our aim is to make a positive long-term contribution to reducing the environmental impact of our operations across all aspects of our business, which includes offering innovative products and solutions that support the circular economy.

We will:

- Prioritise the measurement of our greenhouse gas emissions, energy consumption and waste generation in our direct and indirect operations.
- Invest in renewable energy sources, energy efficiency measures.
- Strive to regularly engage with key suppliers to raise awareness and provide guidance on how to measure and reduce their energy consumption and carbon footprint.
- Prioritise the selection of sustainable products and materials to support our stakeholders and enhance our environmental performance.
- Implement actions to monitor and aim to reduce our environmental impact.
- Consider the environmental risks and opportunities across the Group and aim to minimise risks and take advantage of opportunities.
- Ensure effective engagement with all stakeholders on environmental issues.

Empowering our people

Our aim is to create a safe and inclusive culture where our people can thrive and grow, celebrating individuality and diversity.

We will:

- Aim to develop a culture of openness belonging and trust.
- Strive to provide equal opportunities for all of our team members and promote a ‘speak-up’ culture where everyone feels valued , respected and fairly treated.
- Prioritise training and development opportunities for our team members to help them learn and grow.
- Provide a safe working environment, promoting a positive work-life balance and encouraging a positive attitude towards mental health and well-being.

Community engagement

Our aim is to create a lasting positive social impact in our local community while building a strong distributor network that promotes growth, innovation and collaboration in the industry.

We will:

- Aim to regularly engage with our local community to build relationships and identify areas where the Group can offer help and support.
- Encourage our team members to participate in volunteering activities by contributing to worthwhile local projects and the community.
- Strive to develop and grow our industry community and reach, to help drive discussion and influence change, raising awareness of the impact of the promotional products industry on the environment and how steps can be taken to tackle climate change.

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Responsible leadership

Our aim is to lead responsibly through the use of good governance, not just as a set of guidelines but as a way of establishing our credibility and accountability. By embedding clear, policies processes and safeguards we aim to protect the interests of our stakeholders and mitigate or reduce the risks that the Group faces.

We will:

- Aim to maintain a culture of transparency and trust that encourages open communication, feedback, and continuous improvement.
- Ensure that necessary resources are in place for the Group to meet its objectives and measure performance against them.
- Strive to comply with all laws and regulations within the markets we operate and follow best practice guidance to help us continually improve.
- Uphold and implement a framework of prudent and effective controls with appropriate polices across the Group to enable risks to be assessed and managed, and to ensure that we are acting in a responsible and ethical manner at all times.
- Respect the human rights of all individuals across our Group and our supply chains.
- Implement robust policies and procedures, and strive to ensure all products comply with relevant safety and regulatory obligations.
- Strive to protect the data and privacy of all our stakeholders from misuse or attack.

6. Communication and awareness of this Policy

The Divisional Lead of each Group business will be responsible for ensuring the communication of this Policy (or their business' equivalent policy and procedures) and that training on ways in which employees can help reduce our environmental impact, contribute towards promoting social responsibility and ensuring effective corporate governance forms part of their employee training schedule, as applicable. Attendance at training is compulsory.

7. Consequences of Policy violation

As the Group's businesses operate in many countries, each of which has its unique business, legal and regulatory environment, this Policy does not define a uniform set of sanctions for failure to comply with its requirements. Any violation or potential violation of this Policy will be handled by your local HR Department in accordance with the applicable policies governing employee relations and disciplinary measures.

However, any such case will be taken very seriously, and the Group will not hesitate to take appropriate disciplinary action (which could result in dismissal for gross misconduct) or report the incident to the relevant authorities, as appropriate.

8. Compliance monitoring, review, and continuous improvement

The applicable Divisional Lead or the CEO, as appropriate, will report any purported or potential breach of this Policy to the Group Executive Committee. The CEO will report all serious or continuous non-compliance with this Policy to the Group Board for awareness and monitoring on an ongoing basis.

The CEO in conjunction with the Group Senior ESG Officer will be responsible for ensuring the suitability, adequacy, and effectiveness of this Policy and for making improvements, as appropriate. It will be reviewed and updated where necessary on at least an annual basis.

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