

## Group Policy – Environmental and Climate Change

Approved by Board on 24 November 2022

### 1. Introduction and purpose

The Pebble Group plc (the “**Group**”) has an obligation to be part of the climate crisis solution and understands the importance of reducing greenhouse gas (GHG) emissions and minimising its environmental impact in other ways.

We aim to act responsibly and be transparent in our approach, in our commitments and how we deliver against those commitments. This Policy builds upon our Group Environmental, Social and Governance Policy, focussing specifically on how we strive to reduce our environmental impact directly and in-directly.

### 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 and climate change 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.

The Board delegates responsibility for review and monitoring of climate related risks and opportunities to the Audit Committee. These will be reviewed and approved as part of the overall Group risk appetite and risk register review conducted by the Audit Committee on a biannual basis.

Then it is the responsibility of the Divisional Lead of each Group business and their leadership teams, to ensure the effective implementation and operation of the details outlined in this Policy by their respective businesses and for managing the Group’s performance associated with the environment and climate change.

Management at all levels are responsible for supporting our efforts to minimise our impact on the environment and reduce our greenhouse gas emissions 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 reduce our GHG emissions, 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. It is the responsibility of each Divisional Lead to either incorporate it directly as one of their own working documents or ensure that their business has its own equivalent policy and procedures on minimising their impact on the environment and reducing their GHG emissions. Such policies and procedures must be adapted to the businesses’ own needs and the requirements of applicable local laws and regulations. However, they must also be consistent with, and a more detailed continuation of, the principles and provisions of this Policy.

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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

We will seek to continually improve our environmental performance, minimise our impact on the environment and reduce our GHG emissions, whilst ensuring compliance with relevant government environmental legislation through continued vigilance in all aspects of our Group's operations.

Our aim is to pro-actively reduce our environmental impact by engaging every employee and aligning our teams to consider our environmental performance and take action in our direct operations, as well as in-directly by engaging with our suppliers from whom we source our products and services with a view to collectively supporting the reduction of GHG emissions and minimising environmental impact.

#### We will ensure that:

- Robust policies and procedures are in place across our Group to minimise and reduce our environmental impact.
- We develop KPI's and monitor key objectives and targets for managing our environmental performance at least annually.
- Each of our Group operations allocates clear responsibilities and duties for minimising our environmental impact and reducing GHG emissions within the business to allow for the effective implementation of this Policy or local level version of this Policy.
- We effectively communicate with our employees to raise awareness of the environmental impacts of our business, our performance against our targets and promote a culture of environmental responsibility.
- We work with our employees, partners, suppliers and landlords to promote improved environmental performance.
- We promote the appropriate consideration of sustainability and environmental issues in the products and services we provide to our clients.
- We monitor the external impacts of climate change on the Group and ensure resilience against any potential risks.

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## 6. Our Environmental and Climate Change commitments:

- To conduct our activities in line with relevant environmental legislation and standards.
- Aim to continually improve our environmental performance and integrate environmental and climate change best practice across the Group.
- Reduce our reliance of fossil fuels, reduce our consumption of resources and improve the efficient use of resources.
- Monitor, measure and take action to reduce the GHG emissions of our Group to meet our agreed objectives and targets.
- Manage the amount of waste generated from our direct operations and implement actions to reduce, re-use and recycle where possible.
- Have regard to the environmental impact and the energy performance during the design, refurbishment location or use of buildings.
- Have regard to environmental and climate change considerations during the procurement of goods and services.

## 6. Communication and awareness of this Policy

The Divisional Lead of each Group business within 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 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 Audit Committee and/or ultimately 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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