

NORTH

ESG Policy
BMP 011



Taking you where the world is going

Summary

North's Environmental, Social and Governance (ESG) Policy outlines our commitment to working in a sustainable and responsible way throughout all our operations. This includes mitigating our environmental impact, ensuring social responsibility, and maintaining strong corporate governance practices. Our goal is to build a sustainable future for the people at North, our customers, clients and partners and the communities we work and operate in. We have developed this ESG policy to ensure that sustainability is at the core of all business operations and values, supporting employees and managers in their strategic decisions and daily work and operations.

Policy Aims

- To outline our ESG strategy, increase understanding of ESG, our objectives and standards and the behaviour expected of North and our people.
- To embed ESG and sustainability considerations into all of North's operations and decision-making.
- To support our ESG performance, through understanding our reporting needs, deliverables, and objectives.
- To understand, identify, assess, and respond to ESG-related risks in business operations.
- To establish North as an industry leader in sustainability.

Scope

The ESG Policy applies to all employees and covers all business activities in connection with customers, suppliers and other partners. The policy is supported at Board level.

Policy Context

The ESG Policy has been informed by our values and purpose, UK and global legislation related to climate change and the UN Global Compact, consisting of the Principles for Corporate Social Responsibility.

Our Commitment

North's ESG framework consists of a variety of key commitments across all dimensions of ESG, that drive our overall strategy to work in a sustainable and responsible way.

North's goal is to build a more sustainable, equitable and diverse workforce and positively impact communities. We aim to achieve this through continuous improvements in our ESG performance and innovative business practices.

Implementation

The ESG policy will be implemented throughout our organisation by our ESG Committee. The ESG Committee's primary role is to support the ESG Policy and lead our ESG programme and objectives and drive participation and action across the business. They ensure employees are aware of our commitments and their roles in achieving them and monitor and track performance and progress.

Environment

We are committed to reducing our environmental impact throughout all our operations, and our value chain, as we believe that climate change is one of the most significant risks to our business and people and nature across the world. Our environmental and sustainability strategy ensures we deliver initiatives that drive continuous improvements in mitigating our environmental impact and creating environmental value where possible.

North seeks to comply with current environmental legislation and to align with both UK and Global sustainability targets. In line with the UK Government's Net Zero target and the UN Paris Agreement, we understand the urgent need to decarbonise and reduce our environmental impact across business activities, with the goal of achieving Net Zero. We are committed to driving down our carbon footprint because we want to ensure the long-term sustainability of the planet. We are a carbon neutral business and will continue to remain so.

North is working towards and aligns with several Sustainable Development Goals which provide a framework to drive improvements and embody the key areas of focus. We currently align to four SDGs:

Goal 3: Ensure healthy lives & promote wellbeing at all ages.

Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.

Goal 13: Take urgent action to combat climate change and its impacts.

Our environmental and sustainability strategy encourages an environmentally conscious workplace, in which we work to improve awareness and adoption of sustainable behaviours such as reducing, reusing, and recycling materials to prevent waste, conserving energy, and encouraging sustainable methods of transportation to commute to work.

North aims to create a positive environmental impact through sustainable design, technology and the solutions we provide. The Internet of Things (IoT) plays a key role in fighting climate change and the smart solutions we provide that generate environmental improvements. As part of our environmental sustainability strategy, we will continue to identify ways in which our business solutions can create environmental enhancements.

We integrate relevant material ESG risks into our risk register to ensure that we work to mitigate potential risks and drive improvement.

Social Responsibility

We understand the importance of the social impact we have on our key stakeholders and therefore ensure we take appropriate steps to work in a responsible and ethical way.

We are committed to building relationships with our key stakeholders, investing in employees and partnering with customers, communities, and suppliers to create positive social value wherever possible.

We are committed to promoting equality, diversity and inclusion through recruitment, paying the real living wage and engaging with employees to create an inclusive work environment that supports their professional development, alongside ensuring they have a good work-life balance that prioritises health and wellbeing.

We support learning and development for all employees through our dedicated Learning and Development unit. The Learning and Development team provides the opportunity for employees to enhance their skills through the provision of ongoing training, educational and personal development courses.

We are committed to developing talent, and our apprenticeship programme works to provide opportunities for individuals to gain valuable skills in the workplace.

Our Social Value strategy ensures we support initiatives that benefit the environment, and community growth, particularly for marginalised individuals. We have in place an Employee Volunteering Scheme which allows all employees to take paid time off each year to volunteer in the communities we work and operate in supporting economic, social and environmental growth.

North ensures the protection of human rights and welfare within our own business activities, as well as those of our supply chain. We have in place policies to ensure social responsibility, including our Sustainability and Social Value Policies, Corporate Social Responsibility Policy, Code of Conduct Policy, Equality and Diversity Policy & Modern Slavery Statement.

We encourage and collaborate with stakeholders throughout our value chain to reduce their impact on the environment. We choose to work with like-minded environmentally conscious partners, focusing on the sustainability of our supply chain through a robust onboarding and prequalification process and annual ESG survey, which enables us to understand their performance, commitments and credentials across different areas.

Governance

We are committed to upholding ethical governance within everything we do, and have stringent policies, systems and processes in place which undergo regular review to support responsible business practices, ensure transparency and mitigate risk.

We ensure we have strong corporate governance practices in place, through exemplary board stewardship, management accountability and proactive risk management. We have established and continue to develop clear and effective governance for ESG, setting goals and ensuring accountability through our ESG Committee.

As a provider of connectivity and security services, we have a robust cyber security programme in place, through our ISO 27001-based strategy. This includes a formal GDPR policy, which undergoes strict annual review, and employee training. A data protection clause is also included in all Employee Contracts which must be signed prior to commencing employment.

North has a robust health and safety culture, facilitated through our systems, policies and training. We ensure all employees complete regular health and safety training, in addition to safety-specific courses for relevant roles.

We take a zero-tolerance approach to bribery and corruption, with our Anti-Bribery Policy outlining our commitment to act with integrity in all our dealings. To support our policy, all North employees complete mandatory training to ensure understanding and compliance.

Our Corporate Criminal Offence policy sets out our commitment to preventing tax evasion and the standards we expect employees to adhere to. To support our policy, employees working in high-risk areas are required to undertake online Anti-Tax Evasion Training & Criminal Finances Act training.

Principles for Driving ESG

Our policies are reviewed annually to ensure they are current and relevant to the needs of constantly changing environmental legislation, climatic impacts, and diverse communities in which our business operations impact.

At North, ESG means to assess our impact and drive positive change in relation to ESG metrics through concerted, defined and measurable actions, in order to create value for communities and the wider world.

We will continue to take steps to develop our approach to measuring, reporting and setting targets on our ESG performance as we understand the importance our business plays on the communities we operate in and the planet as a whole.

North will communicate our ESG Policy to our clients, supply chain partners and relevant interested parties and review the policy annually. We will publish the policy on our website.

| Name | Role | Signature | Date |
|--------------|--------------------------|--|----------|
| Scott McEwan | Chief Commercial Officer |  | 06/04/23 |

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