

# **Environmental, Social and Governance (ESG) Policy**

V1.0



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# 1. Scope

This policy outlines the introduction of the ESG Policy within our business focusing on environmental responsibility, social engagement, governance and ethics,. This comprehensive scope demonstrates our commitment to ESG principles and long-term sustainability.

# 2. Responsibilities

The responsibility for overseeing the ESG Policy lies with VCG's Board. The appointed ESG Director is tasked with orchestrating initiatives throughout the organisation to ensure a unified approach. Meanwhile, our Compliance Manager is responsible for upholding compliance with additional ESG policies and related standards and supervising their annual review. Furthermore, our ESG Director keeps a watchful eye on industry trends, policy modifications, and regulatory updates, offering specialized expertise to our business units as necessary.

# 3. Policy

### 3.1 Format and Purpose

VCG is committed to integrating Environmental, Social and Governance (ESG) into our business, processes, and strategy where these efforts can contribute value. VCG aims to integrate certain ESG factors into our business with a focus on matters that are meaningful to our employees and customers. This policy outlines the initiatives VCG will enforce.

Across the business, we have identified priority ESG topics that where we believe we can have the most impact.

### **ESG TARGETS BY 2030**



# 3.2 Environmental Responsibility

Through clear and set objectives, VCG will evidence commitment to reducing environmental footprint, including but not limited to energy consumption, waste management, and emissions

control. We will set clear goals and initiatives for sustainable practices that align with environmental regulations and international standards. VCG also recognise the significant role 3<sup>rd</sup> party suppliers and vendors play in achieving our environmental objectives. Where relevant, we will engage with these parties on sustainability, efficiency, and supply chains.

# 3.3 Social Engagement

VCG's ESG Policy addresses our commitment to social responsibility and details how we engage with our employees, customers, communities, and other stakeholders. We will focus on areas such as diversity and inclusion, labour practices, community involvement, and responsible supply chain management.

### 3.4 Governance and Ethics

In our governance approach, VCG's board of directors holds ultimate responsibility for overseeing ESG initiatives and policy approval. We ensure that we uphold compliance with all relevant laws and ethical standards. Corruption, bribery, and unethical behaviour are strictly prohibited, with mechanisms in place for employees to report such activities. Transparency is integral, with a commitment to disclosing all pertinent ESG data to stakeholders. Our stringent privacy and data security measures protect ESG information from unauthorised access and breaches.

Ethics are a vital component of VCG's ESG Policy. Responsible sourcing, ensuring our supply chain aligns with our ethical standards, is at the core of our commitment. We value diversity and inclusion, fostering an environment where individuals from all backgrounds are embraced. Whistleblower protection mechanisms are in place to ensure unethical practices are reported without fear of retaliation. We require employees to disclose potential conflicts of interest and provide a framework for their management. Our culture thrives on continuous improvement, enabling us to adapt and respond to evolving ethical challenges while upholding the highest standards.

### 3.5 Integration with Business Strategy

VCG places a strong emphasis on positioning the ESG Policy as a central pillar of our business strategy and integrating it into our core operational processes. This will play a critical role in fostering innovation, streamlining cost-efficiency, and proactively addressing risks linked to environmental and social concerns.

# 3.6 Measurement and Reporting

VCG are committed to being transparent with our shareholders, customers, and employees about our ESG initiatives, successes, and goals. Our ESG report provides updates regarding our ESG program, which will also be visible on our website. We value regular, frequent engagement with our stakeholders on ESG matters.

We will consistently track our progress by establishing and formulating annual objectives that align with our overarching ESG 2030 goal. These key performance indicators (KPIs) will be subject to monitoring and reporting through our monthly board meetings, and in alignment with our Management Review Policy.

### 3.7 Performance Improvement

In addition to monitoring our performance against our overall target, we will conduct performance reviews to pinpoint areas for improvement and identify opportunities for enhancement.

We will maintain ongoing research and stay updated on ESG-related legislation and evolving best practices to ensure that opportunities for improvement are identified and, if applicable, integrated into our operations.

### 3.8 Engagement and Training

We will conduct training programs for our employees to raise awareness and educate them about ESG practices and their responsibilities in upholding our ESG commitments.

All employees are required to attend mandatory ESG training annually. We will also keep everyone updated on our progress towards meeting our objectives and introduce volunteer opportunities for VCG employees to support us in achieving our ESG goals.

# 3.9 External Engagement

In addition to internal initiatives, it will be VCG's intention to engage with external suppliers, vendors and partners. Collaborating with these external parties ensures that the entire supply chain adheres to ethical, environmental, and social responsibility standards. We will engage with our suppliers, vendors and partners on a regular basis and conduct review meetings on progress being made towards our ESG KPIs.

### 4. Document Revision

Revision	Date	Author	Description
1.0	30/10/2023	Hollie Dixon	New document under VCG Business
1.0			Management System created.

### 5. Authorisation

The ESG Director is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements of the Document Management Policy, section 3.7 Review and Authorisation. A current version of this document is available to all members of staff on the VCG SharePoint. This policy was approved and is issued on a version-controlled basis under the signature of the Chief Information Officer.

Title	Name	Signature	Date
Chief Information Officer	Roy Reynolds	L. Mas.	2 <sup>nd</sup> November 2023