



CHAMELEON™ TECHNOLOGY

Corporate Social Responsibility, Environmental and Sustainability Policy

Chameleon Technology (UK) Limited (Chameleon) is fully committed to undertaking its business in such a way as to minimise the risk to the built and natural environment, whilst promoting sustainability throughout its operational activities. The objective of this Policy is to limit the impact that our business has on the environment and to manage environmental risk as effectively as possible.

1. Definitions

1.1 Corporate Social Responsibility (CSR)

A company's sense of responsibility towards the community and environment (both ecological and social) in which it operates.

1.2 Environmental Policy

Public statement of an organisation's philosophy, intentions and objectives regarding the environment.

1.3 Sustainability

The maintenance of the factors and practices that contribute to the quality of the environment on a long-term basis.

2. Policy owner

The company policy owner for this Policy is the Managing Director. This Policy is an element of corporate social responsibility (CSR).

3. CSR, Sustainability & Environmental Policy

It is the policy of Chameleon, wherever it conducts activities and business, to ensure that strict operational procedures, including the preparation of risk assessments, are identified and adopted to give proper regard to the conservation of both the built and natural environment upon which its activities have the potential to have a direct or indirect effect. In implementing this Policy, Chameleon fully recognises the importance of complying with the requirements of legislation and relevant local practices, as a minimum by adopting a responsible and proactive approach to measures aimed at safeguarding the environment for all who may be affected by its operational activities.

These compliance measures relate primarily to the design, development and manufacturing activities undertaken by Chameleon employees and subcontractors. In doing so, the company undertakes to reduce the environmental impact of its operations, to include dust, noise, disturbance and inconvenience as well as the prevention of air, water and soil pollution, while taking the necessary precautions to minimise damage from accidents that may occur.

Although certain personnel have ultimate responsibility for this Policy, all staff must recognise that they hold a responsibility for minimising their own environmental impact in their day-to-day activities e.g. minimising energy consumption, use of natural resources, considerations around business travel. Responding to environmental challenges, particularly climate change, requires the involvement of all staff.

4.Objectives

Chameleon's objectives within this Policy are to:

- 4.1 Work to adopt the highest environmental standards in all areas of operation, meeting environmental regulations for electrical and electronic equipment waste management.
- 4.2 Assess our organisation's activities and identify areas where we can minimise impacts.
- 4.3 Minimise waste through careful and efficient use of all materials and energy.
- 4.4 Purchase sustainable products wherever feasible (e.g. recycled, FSC or low environmental impact products and energy from renewable sources).
- 4.5 Publicise our environmental position.
- 4.6 Reduce risks from environmental, health or safety hazards for employees and others in the vicinity of our operations by performing regular risk assessments and attending to any issues raised within the dates specified in the COSHH.
- 4.7 For joint ventures and outsourcing arrangements, senior management should satisfy itself, as far as reasonably practicable, that the systems and controls which are in place are appropriate to monitor and mitigate risk.
- 4.8 Chameleon expects equivalent standards from its suppliers and business partners.
- 4.9 Adopt an environmentally sound transport strategy.
- 4.10 Aim to include environmental and ethical considerations in investment decisions where appropriate.
- 4.11 Assist in developing solutions to environmental problems.
- 4.12 Continually assess the environmental impact of all our operations.

5.Best Practice

- 5.1 Where practical, establish environmental procedures for its operations by setting targets, objectives and indicators to measure performance and review progress.
- 5.2 Continue to develop management processes and operational procedures that seek to prevent pollution.

6.Alignment to risk appetite

6.1 Inherent risks

This Policy supports management of the following inherent risks:

6.1.1 Environmental impact

The company may not be able to uphold its commitment to reduce its carbon dioxide emissions. This may have financial implications for the company's global carbon neutral commitment.

6.1.2 Climate risk

The company fails to regularly update on pricing and capital allocation to reflect the latest scientific evidence in respect of the prevailing climate risk.

6.1.3 Environmental legislation / regulation

Non-compliance with local environmental legislation/regulation by any part of the company. This may have financial/reputational indications for the company.

6.2 Risk appetite

The specific risk appetite statements in relation to this Policy are as follows. The company has no appetite for:

Unaccounted increases in the company's carbon dioxide emissions that compromise the company's public global carbon neutrality status.

Unfavourable reputational or financial implications by failure to comply with local environmental legislation/regulation.

7.Minimum standards

7.1 Risk management and control

7.1.1 Planning/change

Management information for environment risk should be used to provide insight, inform the operational planning process and influence resource allocation including capital. Environmental actions should be considered as part of the business planning exercise.

7.1.2 Risk appetite

Risk appetite statements and tolerances should be clearly defined and refreshed on a regular basis (at least annually) and as an integral part of the planning process. Risk appetite should be defined for the company as a usual situation within an established business, and also needs to be sufficiently flexible to deal with a variety of situations (e.g. rapid market expansion, managing significant change) and should support rather than constrain sensible risk-taking to deliver business strategy.

7.1.3 Risk analysis

- i. Regular reviews of environmental systems and processes must be actively performed to ensure inherent environmental risks are effectively managed.

ii. CSR personnel must ensure that the company undertakes an environment risk assessment to identify those areas susceptible to environment risk and introduce preventative controls into new and existing systems and processes.

7.1.4 Controls

Appropriate controls must be in place to ensure the following requirements are met:

a) Governance

Company CSR contacts will strive to integrate environmental considerations and opportunities into:

- i. Development and implementation of a corporate policy
- ii. Business decision-making
- iii. Purchasing and supplier management
- iv. Managing our buildings and facilities by integrating measurable, monitored environmental actions into our business plans.
- v. Raise staff awareness, encourage and enable them to make an effective contribution to environmental improvement, both in work and within the local community.
- vi. Participate in external initiatives designed to improve environmental awareness and performance.
- vii. Exploiting opportunities to maximise efficiency and minimise environmental impact through our working practices, in areas such as energy management, paper usage, waste reduction and recycling, and communications:

Energy – there must be a commitment to reduce the use of energy, water and other natural resources and implement regular maintenance and improvement programmes to ensure that the building operates at its optimal environmental efficiency.

Waste – the reduction of waste must be a key objective for the company. Where possible, waste materials are recycled. Where waste cannot be recycled, the disposal is in strict compliance with the law and according to the best practicable environmental option.

Transport – the company's business vehicles must comply with emission regulations. The use of telephone, video and web conferencing as an alternative to business travel is encouraged. When business travel is necessary, the mode of travel should be considered, taking into account financial impacts with environmental, health and safety, and work/life balance implications. Alternative types of low-polluting transport as a means of travelling to work is encouraged.

b) Environmental objectives

The company's management will review the company's CSR performance as part of regular Management Review Meetings to ensure that we are meeting our environmental objectives and targets.

c) Environmental responsibilities

Environmental responsibilities must be incorporated within any relevant CSR personnel's job descriptions, objectives and performance assessments.

d) Environmental resource

Adequate environmental resource must be available to manage the company's environmental objectives.

7.1.5 Actions

Where differences in risk appetite and the residual risk profile have been identified, remedial action plans must be put in place. In instances where controls are deemed to be deficient, these action plans should include improvements in both the control design and its operation. In all cases actions plans should include SMART (specific, measurable, achievable, realistic and time-bound) actions, with progress reported on a regular basis to management.

7.1.6 Line management and reporting

Clear lines of internal accountability, responsibility and reporting must be established. Primary responsibility for managing environment-related risks rests with the Managing Director. Appropriate internal controls must be in place, operating effectively, and staff must be adequately trained where necessary.

7.1.7 Escalation of breaches

Material breaches of this Policy, including any identified issues that could lead to a breach, should be notified to the Policy owner immediately (within 24 hours). Materiality of a breach or issue can be determined by reference to the delegated authority limits for risk management that outline the relevant escalation protocols. As primary responsibility for risk management lies with the management of the company, it is expected material breaches should be documented via Management Review Meetings.

7.2 Responsibilities

7.2.1 Managing Director

- i. Ensures that the business manages environmental risk and operates in line with the minimum standards in this Policy.
- ii. Maintains an appropriate control structure and culture to manage environmental risk exposure within appetite.
- iii. Meets management information reporting requirements to demonstrate that environmental risks within the business are being managed effectively.
- iv. Acts as a local subject matter expert and provides guidance in relation to the Policy.

- v. Ensures that the requirements within this Policy are understood by the company to assist in implementing local compliance monitoring arrangements.
- vi. Escalates any areas of concern.

7.2.2 Staff

It is the responsibility of all staff to familiarise themselves with the company's CSR, Environmental and Sustainability Policy.

7.2.3 Other responsibilities

The Managing Director is the main board director with primary responsibility for the company's environmental programme. The management in general are responsible for reviewing and monitoring the Company's CSR, Environmental and Sustainability Policy.

8. Waivers and exceptions

8.1 In exceptional circumstances, and on a case by case basis, a waiver or exception may be granted to this Policy.

8.2 All requests for a waiver or exception in respect of any requirements of this Policy must be discussed with the Policy Owner.

8.3 The Policy Owner will decide upon the application and advise of the outcome.

Chameleon believes that we have a responsibility to care for and protect the environment in which we operate. We are fully committed to improving environmental performance across all of our business activities, and will encourage our business partners and members of the wider community to join us in this effort.



M Woodhall
Managing Director