

Sustainability Policies

Our Business

SIFA Strategy ('SIFA', 'we', 'our') is a specialist ESG consultancy. We work to facilitate the understanding, implementation and embedding of ESG within private and public companies. Our team of consultants work at Board, committee, and management levels, supporting and challenging our clients as a trusted adviser. We deliver a range of services as integral parts of wider ESG programmes or as standalone projects. Our purpose is to support our clients to be sustainable and successful.

This statement sets out our actions and commitments to actively understanding and managing the potential risks to the business, however small, and ensure we continue to act as a responsible business, adhere to strong ethical standards and maintain high levels of integrity in all our business dealings.

Our approach to conducting sustainable business

We are committed to conducting our business in a sustainable, ethical, and responsible manner. It is our belief that good corporate practices are essential to long term sustainable success and must be reflected in our workplace and the workplaces of our clients or partners. Our reputation is important to us, but it is more than that; integrity and ethical behaviour are part of our culture.

SIFA is committed to operating in line with the Ten Principles of the UN Global Compact and to taking action to positively contribute to the UN Sustainable Development Goals (SDGs).

Modern Slavery

We work to ensure that the services we provide are delivered in a way which respect internationally recognised human rights and acknowledge our responsibilities under the UK's Modern Slavery Act 2015. We do not tolerate modern slavery anywhere in our operations or in any of our clients, partners, suppliers, or their respective supply chains. We recognise that modern slavery may take various forms – including slave labour, servitude, forced and compulsory labour and human trafficking – and is a crime and a violation of human rights. We will not knowingly support or deal with any business involved in modern slavery, and strive to assess the risk of modern slavery through careful selection and assessment of new suppliers and reviews of our existing value chain.

Supply Chain and Procurement

Our suppliers fall into two main categories: those providing goods and services for our continued operations such as IT, travel, and facilities; and those that provide services used in delivering for our clients, such as consulting partners, technology partners, or print. We work to select and assess our suppliers considering their respect of human rights and other critical policies and guidelines; their adherence to relevant rules and regulation; as well as their approach to responsible business including consideration of people and planet.

Diversity, Equity, and Inclusion

We aim to create an environment that respects our people's diversity and individuality, while also supporting them in their personal growth and career progression and ensuring that the contributions of all staff are recognised and valued. We are committed to providing equality, fairness, and respect for all in our employment whether full-time, part-time, or contract; and will hire, promote, develop, and compensate our people based solely on merit. In adherence with the Equality Act 2010, we actively oppose and deplore all forms of unlawful discrimination because of age, gender, disability, marital status, race, national origin, religion or sexual orientation or any other protected characteristics or status. We expect our partners, clients and suppliers to also adhere to these strong standards.

Environment

Good environmental practice is important in ensuring that we, and our partners and clients, operate responsible and sustainable businesses, which reduce their negative impact on the environment as much as practicable and comply with all applicable environmental laws, regulations, and standards. SIFA and its clients and partners shall adopt any appropriate policy, standard, procedure, and management system in order to ensure that its operations are managed ecologically and in a sustainable way and shall take necessary

measures in order to prevent pollution, to conserve natural resources required for its operations and implement relevant emergency response plans and procedures.

Anti-Bribery and Corruption

SIFA does not tolerate any form of bribery, whether direct or indirect, by or of its employees, consultants, or any person or company acting on its behalf. Employees and others acting on behalf of SIFA are strictly prohibited from making, soliciting, or receiving any bribes or unauthorised payments, and we will not conduct business with anyone who does not adhere to the appropriate anti-bribery and corruption laws. In all our dealings, SIFA is committed to enforcing and complying with all applicable anti-corruption laws, including the UK Bribery Act 2010 and similar anti-corruption regulations throughout the world, including those relating to actions that could be considered bribery. A breach of these rules by an employee will be treated as grounds for disciplinary action. It should also be noted that violations of antibribery laws can result in criminal convictions, imprisonment and/or fines for the individual and companies concerned.

Tax Evasion

We take a zero-tolerance approach to tax evasion and the facilitation of tax evasion. It is considered a criminal offence to dishonestly evade tax or to assist others to do so. We are committed to complying with all applicable tax laws in the relevant jurisdictions in which we operate and do not tolerate, permit, or allow any SIFA employees, consultants, or any person or company acting on its behalf, to engage in the facilitation of tax evasion or tax fraud anywhere in the world. The involvement in any arrangement which may lead to a diversion of any tax away from the relevant authorities, or failure to report promptly any request or demand to help to commit a tax evasion offence, is also not tolerated. Our clear policy is not to engage in any business practices or transactions where tax evasion is present or suspected to be present, even if it may result in us losing business.

Whistleblowing

SIFA has a Whistleblowing Policy which provides a confidential process by which all our people are able to raise concerns that they may have about the conduct of others in the business or the way in which the business is run, without fear of retaliation. Our partners and clients are also expected to have regard for the importance of preventing and eliminating wrongdoing in their business and should have a communicated process for employees to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.

Data Protection

We recognise the huge responsibility that we have in holding client, employee and supplier data and work to continuously manage and minimise the risks of cyber-attacks and to ensure that data we hold is held securely. SIFA is committed to protecting the integrity of data and systems, and to maintaining the privacy of all individuals and organisations with whom we interact during the course of our business. At all times SIFA will comply with the UK's Data Protection Act 2018 and the relevant Data Protection legislation in the countries in which it operates.

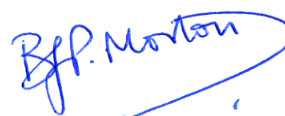
We continuously review our policies and approach to responsible and sustainable business and welcome any feedback or questions. Please do not hesitate to direct any questions to any member of our team.

Signed by:



Fergus Wylie
Co-founder & Director
SIFA Strategy

Signed by:



Ben Morton
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SIFA Strategy