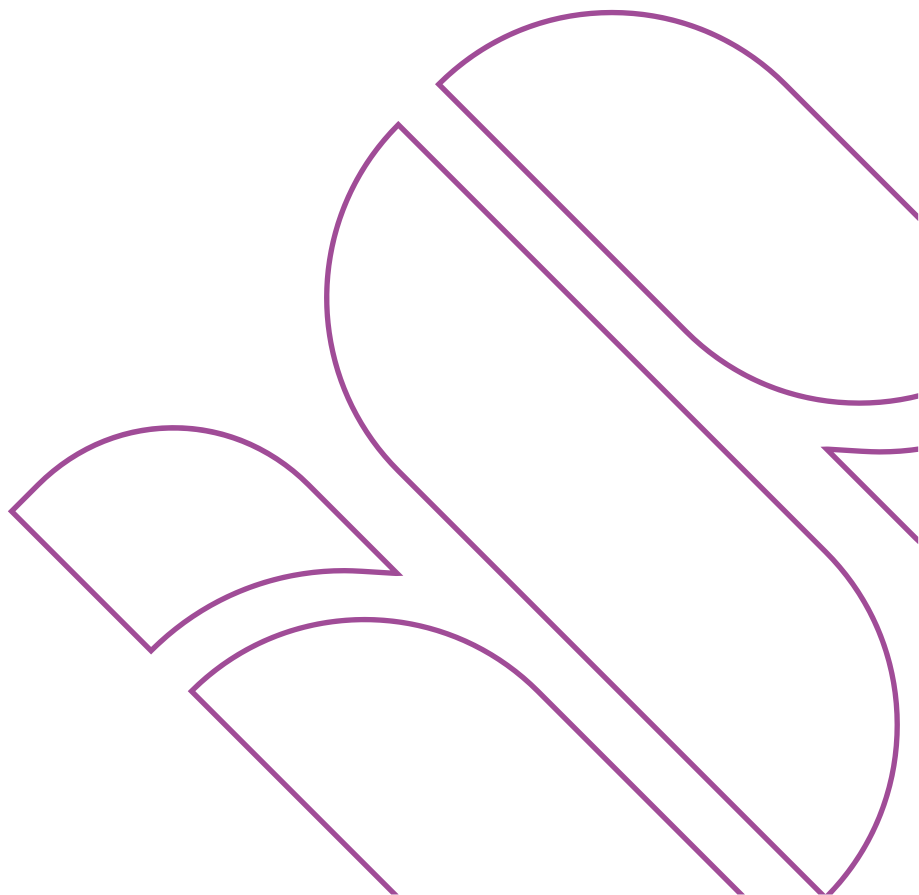


# Sureserve

## Environment, Social and Governance (ESG) Policy 2026





## 1. Purpose

Sureserve Group recognises that strong Environmental, Social and Governance (ESG) performance is fundamental to the long-term success of our business, our clients, and the communities we serve. This ESG Policy sets out our commitment to operating responsibly, ethically, and sustainably across all areas of the Group.

The policy provides a clear framework for managing ESG risks and opportunities, supporting our clients' objectives, strengthening stakeholder trust, and embedding responsible decision-making throughout our operations. It aligns with recognised good practice and complements our standalone Environmental, Health & Safety, People, and Governance policies.

## 2. Scope

This policy applies to:

- **Sureserve Group Limited** (Company number 09411297) and all its subsidiaries incorporating:
  - **Compliance:** Compliance Holdings Ltd, Sureserve Compliance Central Ltd, Sureserve Compliance Fire Ltd, Compliance North Ltd, Sureserve Compliance Northwest Ltd, Sureserve Compliance South Ltd, Sureserve Compliance Water Ltd, Swale Heating Ltd.
  - **Energy Services:** Sureserve Energy Holdings Ltd, Sureserve Energy Services Public Buildings Ltd, Sureserve Energy Services Meters Ltd, Sureserve Energy Services North Ltd, Sureserve Energy Services UK Ltd, Hillside-Infinitas Ltd, Sureserve Energy Services South West, Sureserve Energy Services Wales Ltd
  - **Electrical:** Sureserve Compliance Electrical Holdings Ltd, Purdy Contracts Ltd, R. Dunham (UK) Ltd, CLP Group FS Ltd.
  - **International:** Bonarius Vastgoed B.V.
- All employees, contractors, agency workers, and directors
- All operations, services, offices, sites, and projects delivered on behalf of clients
- Our supply chain, where environmental impacts are influenced by our procurement and contracting decisions

## 3. Our commitments

Sureserve Group is committed to:

- Acting responsibly and ethically in all aspects of our business
- Reducing environmental impact and supporting the transition to a low-carbon economy
- Creating a safe, inclusive, and rewarding workplace
- Delivering positive social value in the communities we serve
- Maintaining strong governance, transparency, and accountability
- Complying with all relevant legal, regulatory, and client requirements
- Continually improving our ESG performance through structured review and engagement

## 4. Environmental Responsibility

We are dedicated to playing a leading role in the installation of clean heating technology, renewable energy, and whole-home retrofits, making a significant contribution to decarbonising the UK's housing stock. We will effectively manage and improve our environmental performance and minimise the impacts of our business on the environment.

Our approach to environmental sustainability includes the following:



- **Environmental Management System (EMS):** The Directors, Senior Management and employees of the Sureserve Group are fully committed to the continual development of an effective Environmental Management System that conforms to ISO 14001.
- **Energy Management and Reduction:** We are committed to ISO 50001. Our Energy Management System includes Energy Action Plans, targets and objectives, and annual energy reviews.
- **Carbon Reduction Plans:** We maintain a Group-wide Carbon Reduction Plan covering Scope 1, Scope 2 and Scope 3 emissions, reported in accordance with the published Carbon Reduction Plan reporting requirements and the Corporate Value Chain (Scope 3) Standard.
- **Waste Management and Reduction:** We ensure waste management is performed in accordance with legislative requirements and the duty of care, and we plan for future legislative change. We aim to minimise waste generation, promote reuse, and recycle where cost-effective.
- **Environmental Legislation and Regulations:** We ensure compliance with all relevant environmental legislation and regulations to prevent, minimise and control pollution.
- **Monitoring Environmental Impact:** We manage and monitor significant environmental aspects and impacts, seeking to minimise impacts arising from operational works, travel, and resource use, while protecting wildlife and preventing pollution.
- **Sustainable Procurement:** Where practical, we procure environmentally superior products and services from suppliers that demonstrate good environmental practices.
- **Training:** We train staff, suppliers and contractors to increase awareness of environmental, energy management and waste management matters.
- **Transition to Net Zero:** We support the transition to net zero by providing affordable, sustainable solutions for social housing providers and their customers, and through community support delivered via the Sureserve Foundation.
- **Biodiversity:** We seek to protect and, where practicable, enhance biodiversity through our activities. This includes avoiding unnecessary harm to habitats and species, complying with environmental controls on sites, and supporting client-led initiatives.
- **Air Quality:** We aim to minimise impacts on air quality arising from our operations, fleet and site activities. We will promote efficient vehicle use, well-maintained plant and equipment, and safe working practices to reduce emissions and nuisance to communities.

## 5. Social Responsibility

Our social initiatives focus on creating a diverse and inclusive workforce, supporting employee development, and delivering positive social value within the communities in which we operate. Key aspects include:

- **Apprenticeships and Training:** We invest in apprenticeships and training programmes to develop a skilled and engaged workforce. Apprentices represent a significant proportion of our workforce, supported by the Sureserve Academy and external training providers.
- **Equality, Inclusion and Diversity:** Our Equal Opportunity and Dignity at Work Policy outlines our commitment to fairness across recruitment, onboarding and operations. We measure and report on gender pay and maintain a zero-tolerance approach to harassment, bullying and victimisation.
- **Community Engagement:** We work closely with our clients on community projects, adopting a resident-first approach that places residents at the heart of service delivery.
- **Social Value Impact:** We use social value measurement tools to track and report impact across communities, people, customers and the environment, supported by a dedicated Social Value Lead.
- **Fuel Poverty:** Through the Sureserve Foundation, we provide support to communities experiencing fuel poverty, helping to ensure a fair and inclusive energy transition.
- **Wellbeing:** We are committed to supporting the physical, mental and emotional wellbeing of our employees by promoting a positive working environment, access to support, and a culture where wellbeing is recognised as integral to performance and safety.
- **Health and Safety:** The health and safety of our employees, contractors, residents and the public is a core priority. We maintain robust health and safety management arrangements and promote a



proactive safety culture across all activities.

- **Supply Chain:** We seek to work with supply chain partners who share our commitment to responsible business practices. We encourage high standards in employment practices, health and safety, ethical conduct and social responsibility across our supply chain.
- **Employment and Recruitment:** We are committed to fair, transparent and inclusive employment and recruitment practices, providing equal opportunity and supporting progression, development and long-term careers across the Group.

## 6. Governance Responsibility

Strong governance is fundamental to the effective management of our business and the delivery of long-term value. Our governance framework includes:

- **Codes of Conduct:** Promotion of ethical conduct across the business and supply chain, covering environmental responsibility, human rights, ethical business practices, and health and safety.
- **Modern Slavery:** A policy framework to address modern slavery and human rights risks within our organisation and supply chain.
- **Anti-Bribery and Corruption:** A zero-tolerance approach to bribery and corruption across all Group companies and business relationships.
- **Whistleblowing:** Encouragement of open reporting, with protections in place to ensure concerns can be raised safely and without retaliation.
- **Tax Strategy:** We operate a responsible and transparent approach to taxation, complying with all applicable tax laws and regulations and ensuring taxes are paid in the jurisdictions where economic activity occurs.
- **Data Privacy and Cybersecurity:** We are committed to protecting personal and business data and maintaining appropriate information security controls. We comply with data protection legislation and take proportionate measures to manage cybersecurity risks.
- **Supply Chain Governance:** We promote ethical and responsible behaviour across our supply chain through our Supplier Code of Conduct and expect suppliers to comply with relevant legal and ethical standards.
- **Risk Management:** We maintain systems and processes to identify, assess and manage risks, including ESG-related risks, to support informed decision-making and the long-term resilience of the business.

## 7. Policy Governance

### 7.1 Responsibilities

The Sureserve Group Board has overall accountability for ESG performance. Senior management is responsible for implementing this policy and ensuring adequate resources are in place. ESG, SHEQ and operations teams have day-to-day responsibility for delivering ESG compliance, reducing impact, monitoring and reporting progress. All employees and contractors are responsible for complying with this policy and relevant procedures.

### 7.2 Measuring, Reporting and Continuous Improvement

Sureserve is committed to evolving its approach to environmental protection in line with emerging best practice, legislation, and stakeholder expectations. We will regularly review this policy, engage with partners, and seek feedback to ensure our activities deliver maximum benefit. Sureserve will set ESG objectives and targets through our management system, investigate incidents and implement corrective actions, and monitor and report performance to drive continuous improvement with updates published annually as part of our ESG reporting.

### 6.3 Policy Review



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This policy will be reviewed annually or sooner if required by changes in legislation, client requirements, or organisational priorities.

A handwritten signature in dark purple ink that reads "GA Levinsohn".

**Graham Levinsohn**  
Chair and CEO  
Sureserve Group Ltd

