



CHAMELEON[®]
TECHNOLOGY

POL002 Corporate Social Responsibility (CSR), Environmental & Sustainability Policy

Issue 10

<i>Date: May 2026</i>	<i>Issue No. 10</i>	<i>SECURITY CLASSIFICATION - PRIVILEGED</i>
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CHAMELEON TECHNOLOGY CSR, ENVIRONMENTAL & SUSTAINABILITY POLICY

The objective of Chameleon Technology (UK) Limited is the '**development and manufacture of bespoke in-home displays and related feedback and awareness products for the global smart meter market**'. And to supply these products and services in such a way, and wherever possible, as to protect the environment throughout our business operations. We regard such effort and effective action in this important domain as the responsibility of all company employees.

The company is committed to complying with the requirements of ISO 14001.

Our strategic goal is to create a coherent framework of sound environmental practices across all areas of our business operations, which will be achieved by: -

Setting objectives for improvements in environmental performance

Monitoring progress against those objectives

Understanding the requirements and expectations of our customers and developing policies to meet these expectations.

Observing all environmental legislation and regulations and ensuring mechanisms are in place to ensure continuing compliance, the company is committed to continual improvement and preventing pollution.

Informing all employees of their legal obligations and ensuring compliance through the provision of suitable training programmes and effective supervision

The efficient use of utilities and natural resources including waste minimisation.

The efficient management and disposal of all waste products and materials.

In addition, we ensure that we work ethically, considering human rights as well as the social, economic and environmental impacts of what we do as a business.

This Policy is communicated to all employees and contractors and is freely available to external interested parties on request. It is formally reviewed at the annual Management Review.

Signed on behalf of the Operational Board



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1. Policy

CTL is committed to operating its business in a socially, environmentally, and economically responsible manner. We recognise that sustainable development is critical to the long-term success of our business and the well-being of the communities in which we operate. This policy serves as the framework for integrating sustainability principles into all aspects of our decision-making and operations, with a particular focus on minimising our environmental impact, promoting ethical practices, and fostering a **Circular Economy**.

We are committed to being a responsible corporate citizen and achieving continual improvement in our sustainability performance.

To meet these goals, CTL undertakes to:

- **Comply and Exceed:** Meet all applicable environmental, social, and economic legislation and legal requirements, striving to go beyond compliance whenever possible.
- **Manage Impact:** Minimise the creation of waste and pollution (air, water, and soil) and reduce the operational footprint of our design, development, and manufacturing activities.
- **Prevent Harm:** Mitigate noise, disturbance, and inconvenience to our surroundings, while taking all necessary precautions to prevent environmental damage from accidents.
- **Systemic Improvement:** Maintain and evolve an effective environmental management system to ensure our sustainability goals are consistently met and updated.

These compliance measures apply to all activities undertaken by the company, its employees, and contractors. While designated leadership holds ultimate accountability for this Policy, environmental stewardship is a collective effort.

Every staff member is responsible for minimising their own environmental impact during day-to-day activities. This includes the conscious reduction of energy consumption, the efficient use of natural resources, and thoughtful consideration of any business travel.

Responding to global environmental challenges, particularly **climate change**, requires the active involvement of our entire workforce. By integrating these principles into our core culture, CTL ensures that our growth remains ethical, resilient, and harmonized with the environment.

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2. Principles and Focus Areas

Our sustainability efforts are guided by the following principles and focus areas:

Environmental - Minimising our ecological footprint, protecting natural resources, and reducing our CO₂e footprint and continually assess the environmental objectives, targets and impact of all our operations.

Social Responsibility - Upholding human rights, ensuring safe and ethical working conditions, promoting diversity and inclusion.

Sustainable Procurement - Integrating environmental, and economic criteria into all purchasing decisions throughout the life cycle of goods and services. Prioritise the use of recycled, refurbished, or low-carbon materials in manufacturing.

Circular Economy - Transitioning from a linear 'take-make-dispose' model to a circular one, focusing on resource efficiency, waste reduction, and material reuse.

Governance and Ethics - Maintaining the highest standards of corporate governance, transparency, and anti-corruption measures.

Reach Net Zero by 2050: Establish a long-term goal to eliminate all possible emissions and neutralise the remaining emissions through permanent carbon removal technology.

Decouple Growth from Emissions: Ensure that organisational expansion or increased production does not lead to a linear increase in CO₂ output (Emissions Intensity reduction). Commit to reducing absolute greenhouse gas emissions by **2030**

Transparent Reporting: Commit to annual public disclosure of carbon footprints, to maintain stakeholder accountability.

Embed "Carbon Literacy": Provide mandatory sustainability training to **100%** of staff to ensure CO₂ reduction is considered in daily decision-making.

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3. Definitions

For the purposes of this document the following definitions are use.

3.1 Corporate Social Responsibility (CSR)

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

3.2 Sustainability

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

3.2.1. Environmental Sustainability

This focuses on the preservation of natural resources and the health of the planet's ecosystems. It involves:

- **Resource Management:** Using renewable resources at a rate they can regenerate.
- **Waste Reduction:** Minimizing pollution and moving toward a **Circular Economy** (reduce, reuse, recycle).
- **Climate Action:** Reducing carbon footprints to mitigate global warming.

3.2.2. Social Sustainability

This involves managing a company's impact on people and society. It aims to protect the well-being of individuals and communities through:

- **Fair Labour Practices:** Ensuring safe working conditions, fair wages, and diversity.
- **Human Rights:** Protecting the rights of employees and those in the supply chain.
- **Community Engagement:** Supporting the local communities where a business operates

3.3 Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

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4. Circular Economy and Resource Efficiency

We are committed to reducing our dependence on virgin resources and eliminating waste by adopting circular economy principles across our operations, wherever possible.

Objectives:

- To significantly reduce waste generation and increase resource efficiency.
- To design products and services for longevity, reuse, repair, and recyclability.
- To transition to renewable and recycled materials.

Actions:

- **Design for Circularity:**
 - Integrate circular design principles (e.g., durability, modularity, reparability, non-toxic materials, ease of disassembly) into the development of new products.
 - Prioritise the use of recycled, renewable, or sustainably certified materials in our products and packaging.
- **Waste Management:** Implement the waste hierarchy: **Avoid, Reduce, Reuse, Recycle, Recover, Dispose.**
 - Set targets for waste reduction across all operations.
 - Implement robust separation and recycling programs for all operational waste.
 - **Reuse and Remanufacturing:** Actively explore and implement business models that support the reuse, repair, or refurbishment of our products and operational assets.
- **Resource Efficiency:** Optimise the use of energy, water, and materials in all facilities and processes.
 - Conduct regular audits to identify and implement efficiency improvements.

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5. Responsibilities

5.1 Operational Board (Exec Chair, CTO, CCO)

Responsibility for the following:

- Reviewing, developing and monitoring the Company's CSR, Environmental and Sustainability Policy.
- Co-ordination, and evaluation of performance.
- Development and management of the company's environmental programme.
- Ensuring that the business manages environmental risk and operates in line with the minimum standards in this Policy.
- Maintaining an appropriate control structure and culture to manage environmental risk exposure.
- Ensuring that the relevant team produces management information reports to demonstrate that environmental risks within the business are being managed effectively.
- Appointing a suitable member of the team to liaise with all teams and provide guidance in relation to the Policy.
- Ensuring that the contents and requirements within this Policy are understood by employees and contractors and to assist in implementing compliance and monitoring arrangements.

5.2 Sustainability Team:

Developing, implementing, monitoring, and reporting on the policy's performance and targets.

5.3 Engineering/Design Team

- Consider environmental aspects and Circular Economy principles during the design process, whether these are new products or design up-dates.
- Identify and ensure compliance with any relevant customer requirements relating to CSR, environmental and sustainability policy and performance.

5.4 Operations Director (Asia Pacific)

- Identify relevant requirements for suppliers and subcontractors relating to CSR, environmental and sustainability policy and performance, and any relevant criteria for procurement. Ensure that these requirements are monitored by the business.

5.5 All Managers

- Ensure fulfilment of compliance obligations.
- Promote awareness of this Policy to employees and contractors and manage a process for continual improvement.

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5.6 Staff

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

6. Risk Management

Inherent risks

This Policy supports management and mitigation of the following inherent risks:

Environmental impact

Maintaining the company's progress toward net-zero targets and carbon reduction goals to ensure full regulatory compliance and protect our brand reputation.

Environmental legislation / regulation

Ensuring continued compliance with environmental legislation/regulation by the company in order to avoid litigation, fines or other authority intervention and to avoid damage to reputation.

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7. Environmental Awareness and Competence training

7.1 Training, Awareness and Competence

- 7.1.1. Chameleon recognise the need for all employees and contractors to be aware of:
- significant environmental impacts, which can be actual or potential, on their respective work activities;
 - the Company's current environmental management system and conformance requirements; and
 - potential consequences of non-compliance or deviation from specified environmental operating procedure.
- 7.1.2. Chameleon will ensure that employees and contractors are made aware of any relevant policies, standards, procedures and guidelines, laws, regulations, contractual terms and generally held standards of ethics and acceptable behaviour ("**CSR and Environmental Requirements**"). This will be raised with new employees and contractors as part of their induction.
- 7.1.3. Chameleon will continue to raise awareness of CSR and Environmental Requirements across all members of the team in order to maintain a consistent level of awareness.
- 7.1.4. Chameleon will ensure that relevant members of staff are trained in relation to environmental aspects, obligations and impacts relevant to their role in business; the objective of which is to ensure that Company personnel performing tasks which can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience.

7.2 Communication

The Company establishes and maintains procedures for adequate communication, both internal and external, in relation to environmental issues, functions and documentation. Lines of communication are defined in applicable procedures.

7.3 Environmental Records

All environmental records relevant to the Company's environmental management system procedures and requirements are maintained, stored, identified, indexed and made readily retrievable.

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The records are both identifiable and traceable to the activity, product or service involved.

The control of environmental records rests with Company personnel who have the responsibility for authority and verification.

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8. Modern Slavery and Human Trafficking Policy

Compliance with this section 8 of the policy is mandatory by all employees and contractors.

8.1 Anti-slavery and human trafficking Policy Statement

This section of the policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, Directors, Officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Chameleon strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

8.2 Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery.

We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

8.3 Assessment

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.

As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers against modern slavery and human trafficking related prohibitions in our contracts with them.

8.4 Action

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If we find that other individuals or organisations working on our behalf have breached this section 8 of the policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

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