THE CLARUS NETWORKS GROUP

CLARUS NETWORKS LTD

Environmental Policy

Versioning History

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DOCUMENT AUTHOR	Emma Gartland
DOCUMENT OWNER	Derek Phillips, Director

Revision history

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1	20/01/20	J Dalgleish	Launch of policy	All
2	11/01/21	J Dalgleish	None	All
3	10/01/22	J Dalgleish	None	All
4	28/02/23	K Andrews	Simplified layout, clarification of policy statement	All
5	29/02/24	K Andrews	Review	All
6	25/02/25	E Gartland	Review	All
7	16/02/26	E Gartland	Review	All
8	14/07/26	E Gartland	Update for changes to ISO 14001	All

Approval

NAME	POSITION	SIGNATURE	DATE
Derek Phillips	Managing Director		22/01/20
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Derek Phillips	Managing Director		17/02/26
Derek Phillips	Managing Director		21/07/26

1. Introduction

The Clarus Networks Group is a provider of specialist connectivity solutions. The Group operates within the UK, EU, USA and Brasil and exports globally.

This policy forms part of Integrated Management System for Clarus Networks Limited.

As a modern, forward-looking business, Clarus recognises at senior levels the need to ensure that its business works to achieve a balance between the environment, the economy and society. These are known as the *Three Pillars of Sustainability*.

The operation of this IMS has many benefits for the environment and for the business, including:

- Protecting the environment in the course of normal business activities
- Preventing or effectively dealing with incidents affecting the environment
- Meeting legal and regulatory compliance requirements
- Contributing to a better understanding of the environment and the organisation's role within it
- Demonstrating a responsible attitude to the protection of the environment
- Maintaining and enhancing shareholder value

It is important to understand which areas of the business are currently within the umbrella of the IMS and which are excluded. The boundaries of the IMS as implemented within Clarus are defined within the document entitled *IMS Context, Requirements and Scope*. It is recommended that this document be reviewed in conjunction with this policy.

The purpose of this document is to define an overall policy with regard to environmental management that is appropriate to the purpose of Clarus, and includes:

- A framework for setting objectives
- A commitment to satisfying applicable requirements
- A commitment to continual improvement of the IMS

This Environmental Policy is available in both paper and electronic form and will be communicated within the organisation and to all relevant stakeholders and interested parties.

2. Environmental policy

2.1.Environmental aspects and impacts

Clarus will determine the environmental aspects of its business activities, products and services by understanding the life cycle of each, and their corresponding potential and actual environmental impacts.

A documented process will be used to identify those aspects that have a real or possible significant impact on the environment, so that they can be effectively managed on an ongoing basis.

2.2.Framework for setting objectives

Objectives will be defined for environmental planning within an annual cycle timed to coincide with organisational budget planning. This will ensure that adequate funding is obtained for the improvement activities identified. These objectives will be based upon a clear understanding of the overall environmental requirements and how they may change during the year.

Environmental objectives will be documented in the *Environmental Management Plan* for the relevant financial year, together with details of a plan for how they will be achieved. Once approved, this plan will be reviewed on a 6-monthly basis as part of the management review process, at which time the objectives will also be reviewed to ensure that they remain valid. If amendments are required, these will be managed through the organisational change management process.

2.3.Commitment to the protection of the environment

Commitment to the protection of the environment extends to senior levels of the organisation and will be demonstrated through this *Environmental Policy* and the provision of appropriate resources to establish and develop the Environmental Management System. This commitment extends to:

- The prevention of pollution
- The preservation and conservation of natural resources
- Sustainable resource use
- Climate change mitigation and adaptation
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2.4.Commitment to meeting compliance obligations

Top management is committed to meeting its relevant compliance obligations through the IMS. These obligations may include:

- Relevant needs and expectations (expressed as requirements) of interested parties
- Legal and regulatory obligations
- Obligations stated as part of contracts with third parties

A process is in place to ensure that existing obligations are reviewed on a regular basis, and new ones are identified as appropriate.

2.5.Continual improvement of the IMS

Clarus's policy with regard to continual improvement of the IMS is to:

- Continually improve the effectiveness of the Environmental Management System across all areas within scope
- Enhance current processes to bring them into line with good practice as defined within ISO14001
- Achieve ISO14001 certification and maintain it on an ongoing basis
- Increase the level of proactivity (and the business perception of proactivity) with regard to ongoing environmental management
- Review relevant metrics on an annual basis to assess whether it is appropriate to change them, based on collected historical data and feedback from relevant sources
- Obtain ideas for improvement via regular review meetings with interested parties, and document them
- Review ideas for continual improvement at regular management meetings in order to prioritise them and assess timescales and benefits

Ideas for improvements may be obtained from any source including customers, suppliers, employees, risk assessments and audits. Once identified, they will be documented and evaluated by the staff member responsible for continual improvement. If accepted, the improvement proposal will be prioritised in order to allow more effective planning.

3. Policy Statement

We positively encourage environmental awareness and compliance by:

- Ensuring compliance with environmental standards in all areas of operation and exceeding relevant legislation where reasonably practicable;
- Committing to the use of local suppliers where reasonably practicable;
- Carrying out procurement and purchasing activities that, where practicable, result in only low impact, recycled or biodegradable products being purchased;
- Ensuring any waste produced from our work activities is separated to enable the recycling of materials as a sustainable alternative to landfill;
- Minimising our waste through the above procurement and recycling processes;
- Reducing our greenhouse gas emissions;

- Ensuing our buildings are as energy efficient as reasonably practicable;
- Briefing all staff on the group transport policy which promotes environmentally friendly modes of transport;
- Encouraging the open exchange of environmental information with clients and suppliers;
- Providing training where necessary to ensure environmental standards are met; and
- Monitoring and assessing the environmental impact of all our operations.

The Clarus Networks Group management team is responsible for establishing the overall Environment policy. It will periodically review its environmental performance and this policy.

Signed: Derek Phillips Date: 21 July 2026
Position: Director