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17 August 2022

## **Rubix Ltd.**

### **United Nations Global Compact Statement of Support**

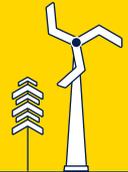
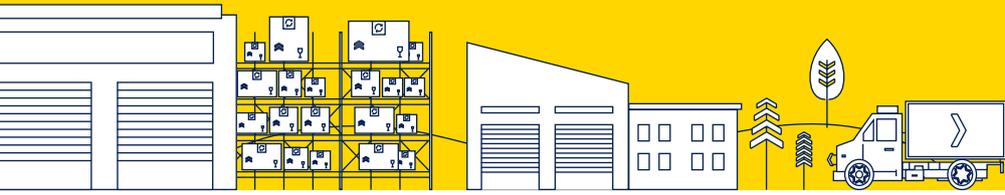
Rubix aims to have a positive impact on society. We have been a signatory to the United Nations Global Compact (UNGC) since 2017 when the group was founded, as part of our ambition to advance progress on social, environmental, and ethical issues. Our commitment to the UNGC is embedded in our groupwide Code of Conduct & Ethics and our Supplier Code of Conduct to support the continued integration of its principles within the Group's identity, business practices and value chain.

Rubix is Europe's leading industrial distributor and the only one with a footprint that spans the continent. We offer specialist expertise in specifying, providing, and installing an unrivalled scope of industrial parts, with a tailor-made service for our clients. Given our scale and unique position as a key partner, we recognise our opportunity to support European industry in transitioning to a cleaner, more sustainable future. Through our culture of innovation, deep product knowledge and specialist technical services we enable clients to reduce emissions and other environmental impacts, while increasing efficiency, productivity, and safety within their operations.

Rubix publishes a standalone Environmental, Social and Governance (ESG) Report on an annual basis. The Report sets out our policies and performance in material ESG topics, including those covered by the UNGC. Rubix made good progress in 2021 against the objectives set out in our five-year roadmap. We reduced our scope 1 & 2 emissions intensity by nearly 8% and launched our online condition monitoring platform to help customers monitor key drivers of emissions in their operations. We also reduced our lost-time accident rate and increased our employee engagement and employee net promoter scores.

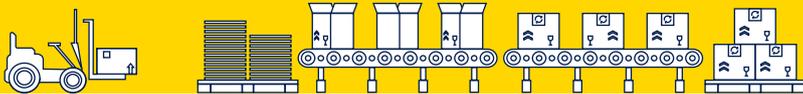
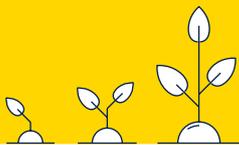
I am pleased to confirm that Rubix Ltd. reaffirms its support of the United Nations Global Compact. Our 2022 ESG Report meets the annual Communication on Progress requirement, describing our actions in implementing the UNGC's ten principles on human and labour rights, environment, and anti-corruption. The Report is attached here and published on our website at [www.rubix-group.com/sustainability](http://www.rubix-group.com/sustainability), alongside other sustainability policies and reports.

**Martin Thomsen**  
Group Chief Executive Officer



# Environmental, Social and Governance report

2022



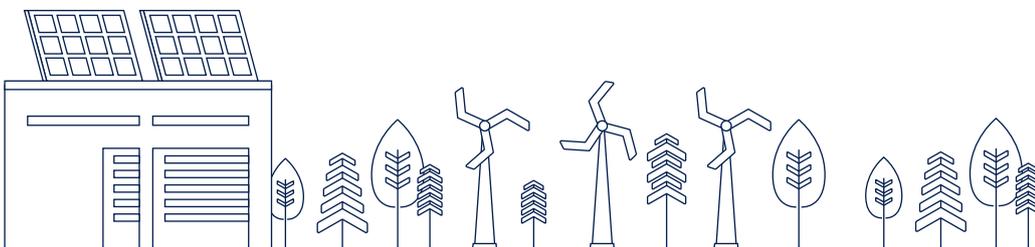
**RUBIX**





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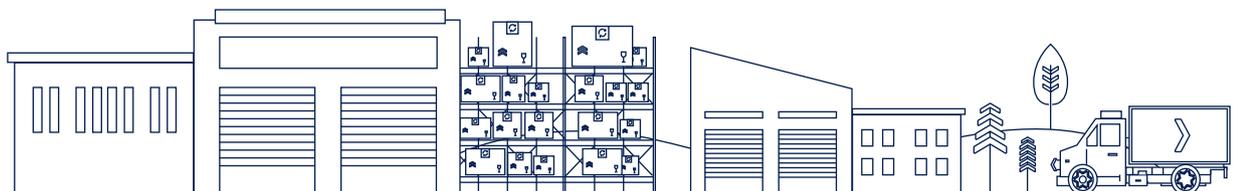
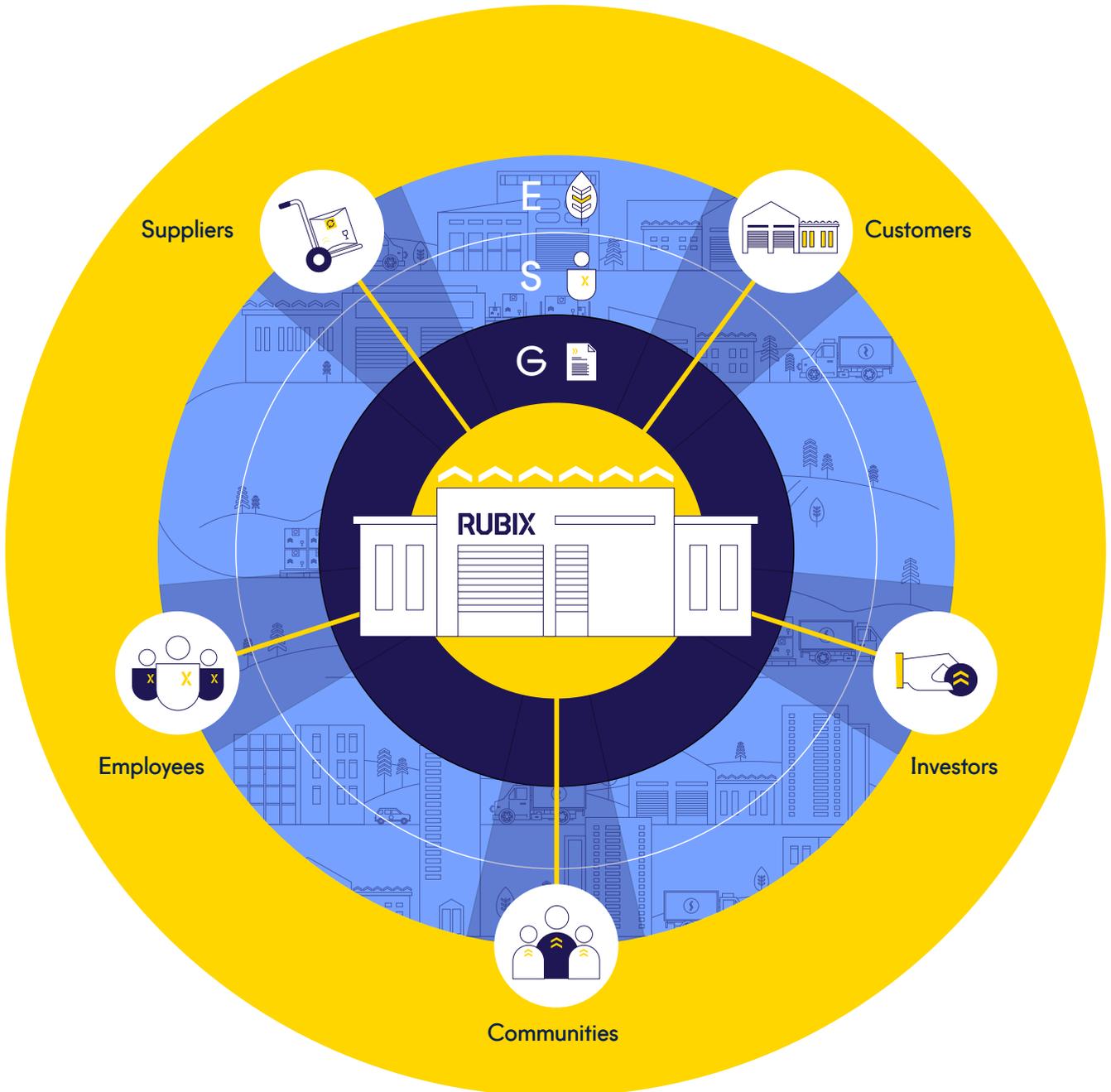


# ESG approach, strategy and 2021 achievements





Environmental, Social and Governance (ESG) practices are integral to our business model and strategic growth priorities. As Europe's leading distributor of maintenance, repair and overhaul (MRO) products and services, we can significantly influence ESG issues through our businesses, and we are uniquely positioned to support our customers and suppliers on their ESG journeys.





## ESG mission and purpose

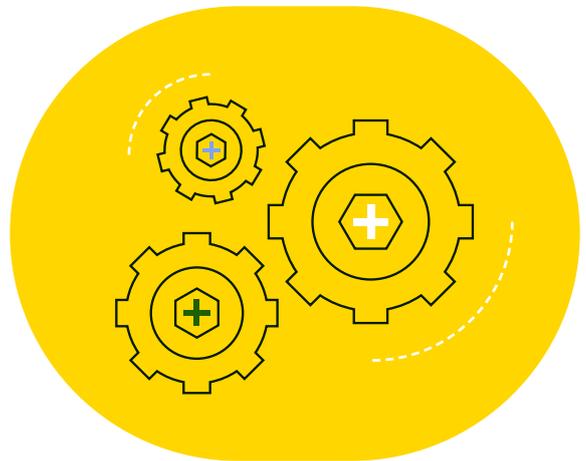
We exist to keep the wheels of industry turning, right across Europe. That is our purpose and it sits at the heart of our multi-specialist value proposition.

We are committed to ensuring that our business model creates value for stakeholders in a socially and environmentally responsible manner, with the highest ethical and business standards applied across our value chain.

We aim to fulfil our purpose sustainably by delivering solutions that improve the efficiency of our customers' manufacturing processes and reduce the environmental impact both of our own operations and those of our customers.

### Our core values

- › Act with integrity
- › Own and take action
- › Stay curious
- › Never settle
- › Embrace perspectives



Embedding these values in the foundations of our business ensures ESG factors are driving and guiding our actions and ambitions.





## Our five-year ESG roadmap

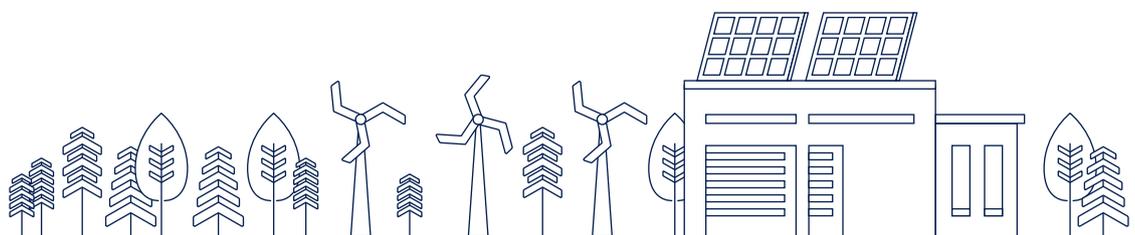
In 2020, we established a five-year plan to embed ESG initiatives into our business model and increase the transparency of our ESG actions and reporting.

Rubix is committed to providing comprehensive public disclosure on its ESG status while tracking progress using best practice ESG frameworks. Formed in 2017 through the merger of UK-based Brammer and France-based IPH, we recognise we face a journey towards our framework-alignment goal, especially as we establish processes to accurately calculate and track all material aspects of our environmental performance.

Our roadmap is aligned to what we consider to be the leading ESG frameworks relevant to our business with an implementation plan for action against each one. These include GRI (Global Reporting Initiative), CDP (previously Carbon Disclosure Project) and TCFD (Taskforce on Climate-related Financial Disclosure), as well as best practice climate-related initiatives such as the Science-Based Targets initiative (SBTi).

Our ESG strategy is supported by a strong and transparent governance structure, a compliance and policy framework, and the Group's Code of Conduct and Ethics for our employees and business partners. We have developed, and continue to enhance, KPIs to track our progress against our ESG targets and objectives.

Our focus on environmental initiatives includes reducing greenhouse gas emissions, reducing our use of energy, packaging, water and other resources, and reducing the waste we produce. We are also working with our customers to understand how we can collaborate with and support them in reducing their environmental footprints. We have also started to extend these efforts to engage with our suppliers to evaluate and reduce greenhouse gas emissions across our end-to-end supply chain.





# Our ESG disclosure roadmap

## Frameworks and ratings alignment achieved since 2020



Adoption of UNSDG



Align ESG report with Global Reporting Initiative (GRI)



Public disclosure to CDP



Signatory support for the Taskforce on Climate-Related Financial Disclosure (TCFD)



TCFD implementation and aligned reporting



## Progress on greenhouse gas emissions reporting 2021 2022 2023 2024

Calculation of Scope 1 and 2 GHG inventory

Setting of Scope 1 and 2 emission reduction targets

Calculation of full scope 3 inventory

Setting of Scope 3 emission reduction targets



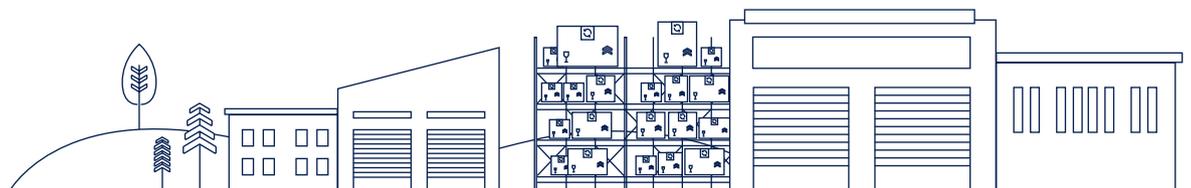
Signatory commitment to the Science-Based Targets initiative

Obtain official validation of Science-Based Targets



Renewable energy roadmap

Define strategy for net-zero





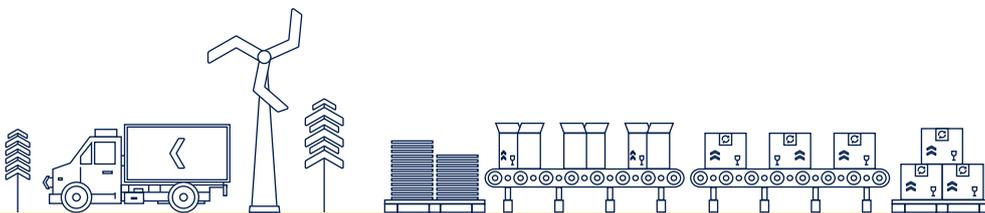
## United Nations Sustainable Development Goals

The United Nations Sustainable Development Goals (UN SDGs) address global challenges through 17 ambitious goals for people and the planet. Aimed to be achieved by 2030, these goals include eliminating poverty and inequality, addressing climate change and environmental degradation, and achieving peace and justice.

We recognise the role that Rubix can play in advancing the UN SDGs, both within our organisation and across our value chain.

We have identified four goals to which we have the greatest potential to contribute:

- › Decent work and economic growth (UNSDG 8)
- › Industry, innovation and infrastructure (UNSDG 9)
- › Responsible consumption and production (UNSDG 12)
- › Climate action (UNSDG 13)





## 1. Decent work and economic growth (UNSDG 8)

“Sustained and inclusive economic growth can drive progress, create decent jobs for all and improve living standards.”

Our state-of-the-art e-learning centre, Rubix Academy delivers high-quality technical, product and sales development learning to all of our employees via targeted programmes. This ensures continuing development of our employees’ technical knowledge. In addition, several of our entities have established apprenticeship programmes that are open to individuals at varying levels of formal educational attainment.

8 DECENT WORK AND ECONOMIC GROWTH

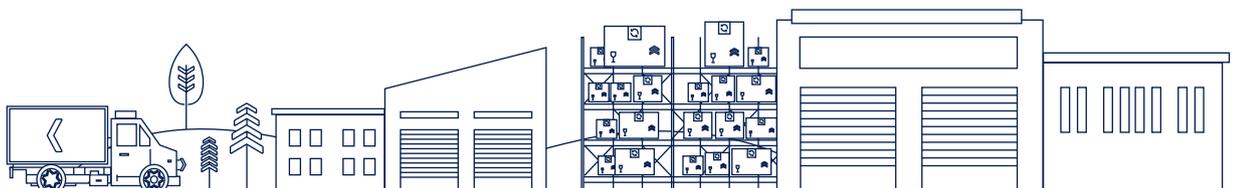


## 2. Industry, innovation and infrastructure (UNSDG 9)

“Inclusive and sustainable industrialisation, together with innovation and infrastructure, can unleash dynamic and competitive economic forces that generate employment and income. They play a key role in introducing and promoting new technologies, facilitating international trade and enabling the efficient use of resources.”

In 2021, Rubix generated over 25% of total Group revenues from services that include specific sustainability-related solutions, such as condition monitoring to proactively identify repair and replacement needs, and air leakage surveys to reduce wasted energy from compressed air systems.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE





### 3. Responsible consumption and production (UNSDG 12)

“Sustainable consumption and production relates to doing more with less. It is also about decoupling economic growth from environmental degradation, increasing resource efficiency and promoting sustainable lifestyles. Sustainable consumption and production can also contribute substantially to poverty alleviation and the transition towards low-carbon and green economies.”

Our ISO 14001:2015 accreditation demonstrates our commitment to minimising our environmental impact. Rubix’s waste and recycling programmes have piloted innovative material recycling initiatives such as diverting rubber waste to industrial and social applications.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



### 4. Climate action (UNSDG 13)

“Climate change is affecting every country on every continent. It is disrupting national economies and affecting lives. Weather patterns are changing, sea levels are rising, and weather events are becoming more extreme. Saving lives and livelihoods requires urgent action to address the climate emergency.”

Rubix reduced Scope 1 & 2 GHG emissions by 21% from 2019 to 2021. During 2023 we will begin the process of setting science-based targets to support a net-zero strategy.

13 CLIMATE ACTION





## United Nations Global Compact

Rubix is committed to upholding and respecting human rights and has been a signatory to the United Nations Global Compact (UNGC) since 2017, when our business was created. We respect the ten principles of the UNGC on human rights, labour, environment and anti-corruption and are committed to transparency and annual reporting on our implementation of the principles.



**United Nations**  
Global Compact

## Key policies that support our commitment to UNGC

- › Group Code of Conduct and Ethics
- › Labour Practices Policy
- › Recruitment Policy
- › Paternity and Maternity Policy
- › Flexible Work Policy
- › Health and Safety Policy
- › Dignity at Work Policy
- › Modern Slavery Act Transparency Statement
- › Supplier Code of Conduct

Our latest UNGC report is available [here](#)

Brief details of these policies are set out under [Additional Information](#)





# Our ESG strategy is focused on three principal areas



## Customers and suppliers

Supporting our customers on their sustainability journeys by facilitating efficiency through our product and service offerings, including vendor managed inventory, Insite™ and technical services such as air leakage reduction and condition monitoring.

Working with our suppliers to understand their environmental impact and adherence to our code of conduct.



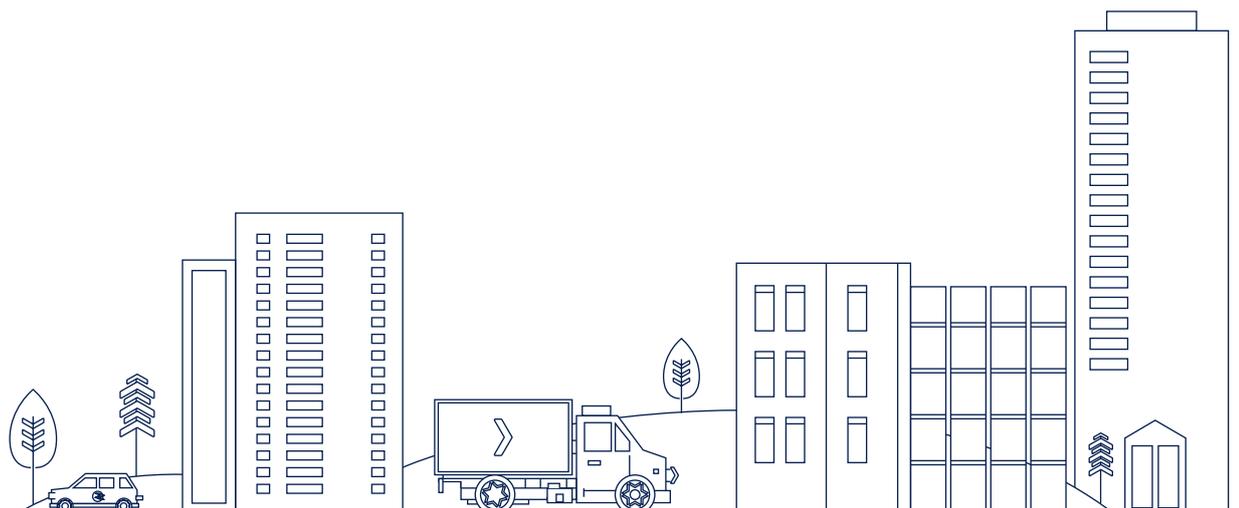
## Environmental stewardship

Delivering the Rubix multi-specialist value proposition as efficiently as possible to reduce the direct environmental impact of our operations, as well as the indirect impacts that arise from our position as the link between thousands of suppliers and c200,000 customers.



## People

Protecting the well-being of our employees, investing in and supporting their professional development and striving to build an inclusive and diverse organisation.





We continue to build and refine the KPIs that will be the focus of our disclosure across our principal ESG areas. Today these include:



### 1. Customers and suppliers

Growth in revenues from sustainability-related services; and ESG assessments of suppliers.



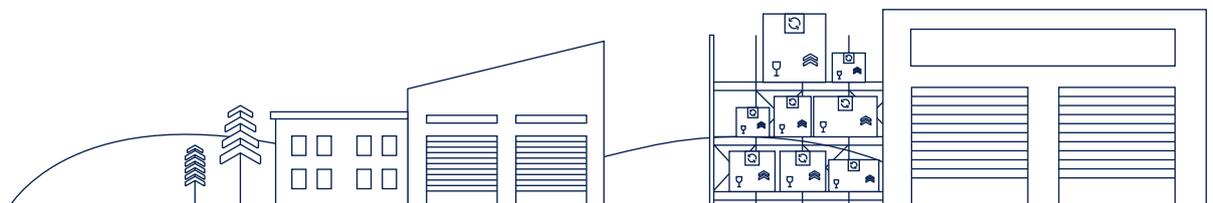
### 2. Environmental stewardship

Tonnes of CO<sub>2</sub>e emissions per unit of revenue.



### 3. People

Gender ratio of employees in management positions; employee engagement index; and lost time from accidents (LTA).





# 2021 achievements at a glance

We made good progress in 2021 against the objectives that we set for ourselves in our 2020 roadmap:



## Reporting

- › Completed a materiality assessment in line with GRI recommendations ([page 15](#))
- › Published our first TCFD report ([page 18](#))
- › Reported to CDP, achieving a score of B- ([page 24](#))
- › Retained our EcoVadis Silver rating with a significantly improved score ([page 24](#))



## Environmental

- › Reduced our Scope 1 and Scope 2 emissions intensity by nearly 8% ([page 33](#))
- › Began the process of automating collection of our GHG emissions data ([page 34](#))
- › Launched our online condition monitoring platform to help customers monitor key drivers of their operations' Scope 1 and Scope 2 emissions ([page 27](#))
- › Completed an ESG assessment of our Group Core suppliers ([page 30](#))



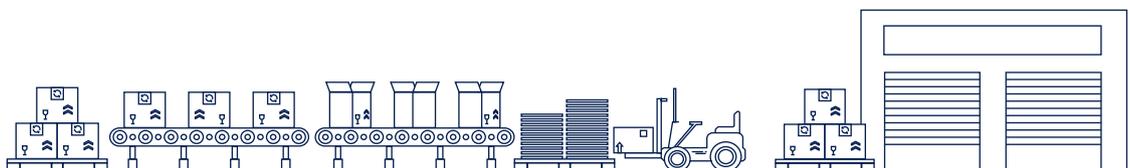
## Social

- › Achieved our target of reducing our Lost Time from Accidents (LTA) ratio to below 1 ([page 38](#))
- › Improved our employee engagement and employee NPS scores ([page 40](#))



## Governance

- › Established a regular (monthly and quarterly) focus on ESG matters across our executive and management committees ([page 45](#))





# Materiality assessment

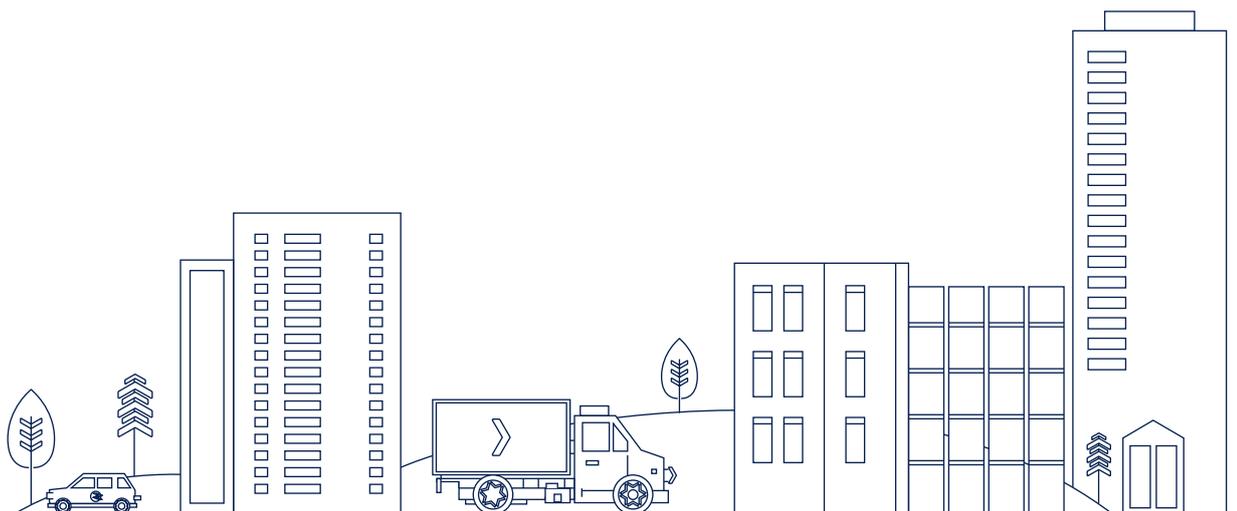
We are committed to ensuring that our business model creates value for all stakeholders in a socially and environmentally responsible manner, with the highest ethical and business standards applied across our value chain. We want to focus our sustainability strategy on the issues that matter most to the environment, our people, and our partners.

Accordingly, in early 2022 we engaged Agendi to help us conduct an ESG materiality assessment aligned with the recommendations of the Global Reporting Initiative (GRI) and the Sustainable Accounting Standards Board's (SASB) definition of double materiality (the impact of ESG issues on Rubix's financial success and Rubix's influence on the environment and society).

We identified a list of nearly fifty ESG issues specific to the industrial distribution business, drawing inspiration from internal and external resources on materiality including:

- › Our UNSDG-aligned sustainability goals
- › The MSCI ESG Industry Materiality Map
- › The Sustainability Accounting Standards Board (SASB) Materiality Finder
- › The Governance and Accountability Institute (G&A) "Sustainability – What Matters?" report
- › S&P Global CSA's 2022 Sustainability Yearbook
- › FTSE 350 peer reporting

From this extensive list we developed a shortlist of 12 issues deemed most material to our business and aligned with our ESG strategic focus areas.





## Environmental

Climate risk and resilience	The ability to prepare for, recover from, and adapt to risks associated with climate change (including severe weather, extreme temperatures, and other damaging impacts).
Energy and emissions	The use of energy for our operations, and the greenhouse gas emissions associated with our business. This includes: energy efficiency; energy management; renewable energy; carbon offsetting; and carbon capture & storage.
Environmental policy & management systems	Processes and practices that enable us to reduce our environmental impacts and increase our operating efficiency.
Recycling	Collecting and processing materials that would otherwise be thrown away as waste and turning them into new products.
Sustainable logistics & product distribution	The transportation of goods between vendor and purchaser with lowest possible impact on the ecological and social environment, and includes the whole distribution process from storage, order processing and picking, packaging, improved vehicle loadings, delivery to the customer or purchaser and taking back packaging.
Sustainable packaging	The sourcing, development, and use of packaging solutions that have minimal environmental impacts.
Waste & hazardous materials management	The collection, treatment, and disposal of waste material that, when improperly handled, can cause substantial harm to human health and safety or to the environment.

## Social and Governance

Business continuity	The planning and preparation needed to ensure our company will have the capability to perform its critical business functions during emergency events.
Customer engagement and experience	The level and quality of interaction between an external customer and our company.
Occupational health and safety	Processes and practices that deal with all aspects of health and safety in the workplace, with a strong focus on primary prevention of hazards.
Business ethics	The moral principles that act as guidelines for the way our business conducts itself and its transactions, particularly regarding potentially controversial subjects including corporate governance, insider trading, bribery, discrimination, corporate social responsibility, and fiduciary responsibilities.
Governance and accountability	The policies and procedures that help safeguard the interest of various business stakeholders, and ensure that the company remains answerable for the actions and decisions taken.

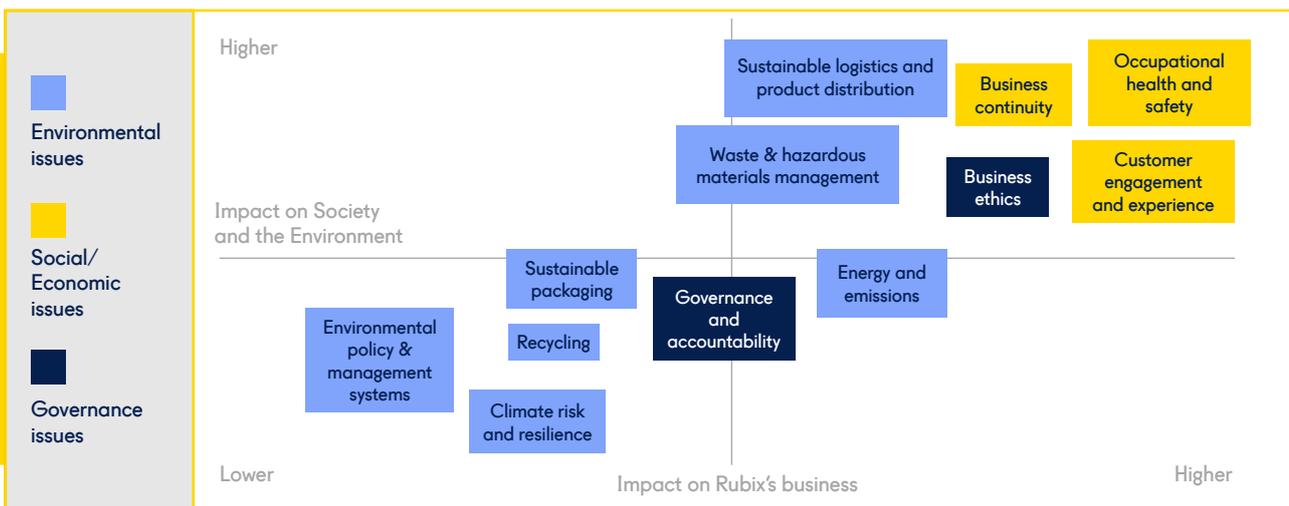




We engaged with key stakeholder groups including customers, suppliers, colleagues and our executive leadership, to accurately assess their respective interests and priorities. We collected feedback on our shortlisted issues through surveys, interviews and workshops to gauge (for each issue):

- › the importance to our business in the short- and long-term
- › the importance to the respondent's business (if external stakeholder)
- › our ability to influence our industry and value chain partners
- › our performance and preparedness

The responses from each respondent were scored, standardised, and mapped onto a prioritisation matrix to help understand the relative importance of each issue and to guide our future actions.



This exercise revealed a strong alignment between the internal and external impacts of our shortlisted issues, which underlines the critical role that Rubix plays across our partners' supply chains.

These results have validated our strategic approach to ESG which focuses on our customers and suppliers, our people and environmental stewardship.





## Task Force on Climate-related Financial Disclosure (TCFD)

In May 2021, we officially signed our support for the Task Force on Climate-related Financial Disclosure (TCFD). The TCFD provides a disclosure framework that can be used to report on climate-related risks and opportunities, their actual and potential impacts on business, strategy and financial planning, and how climate-related issues are embedded across governance, strategy, risk management, and metrics and targets. We view disclosure against the TCFD framework as an essential step on our ESG roadmap, both to provide greater transparency to stakeholders on Rubix's climate-related preparedness and to further develop our understanding of and resilience to climate-related risks and opportunities.

This first disclosure builds upon the climate-related disclosures in our 2021 CDP climate change response. Our TCFD reporting process involved exploring new areas of work such as climate scenario analysis, where risks and opportunities under various possible climate futures were evaluated, through engagement sessions with key roles and business segments across Rubix.

The outcomes of the process have provided valuable insights on the physical and transition risks we may be faced with in the future, our resiliency and potential transition opportunities.

Our disclosures against the 11 TCFD recommendations are grouped under Governance, Strategy, Risk Management and Metrics and Targets and are contained in our [full TCFD Report](#).



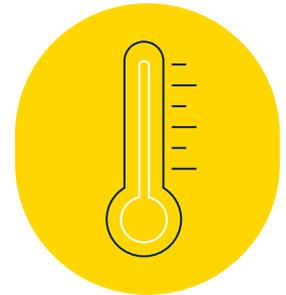


# Strategic resilience under different climate-related scenarios

As part of Rubix's TCFD reporting process, the Group conducted its first iteration of climate-related scenario analysis to evaluate against multiple climate scenarios.

Scenarios applied	
High Transition Risk	IEA Net Zero by 2050
High Physical Risk	IPCC SSP5-8.5
Mid-range	IPCC SSP2-4.5

The IEA's Net Zero by 2050 scenario was selected as a "2°C or lower scenario" in accordance with the TCFD recommendations to explore transition risks.



This scenario aligns with the Group's ambitions to define a net zero strategy. In addition, this scenario is highly relevant to the sector and markets in which the Group operates, offering key assumptions surrounding industrial transitions, and carbon pricing. The IPCC's SSP5-8.5 and SSP2-4.5 were applied as a means to explore physical risks and Rubix's possible exposure to climate hazards under a worst-case scenario and a middle of the road scenario.

Where possible, climate risks were evaluated in terms of their potential to result in 'substantive financial impact' or 'substantial strategic impact' to Rubix. Substantive financial impact is defined as a €5m impact to Adjusted Earnings Before Interest, Tax and Amortisation.

Substantive strategic impact is characterised as any impact that prevents the business from delivering its key strategic priorities over the medium- or long-term: key account growth, network development (the addition of branches), digital and services growth, own brand development and continuous improvement/efficiencies.





## Transition scenario analysis and outcome

To quantitatively evaluate transition risks relating to carbon pricing, the advanced economies' carbon prices from the IEA's Net Zero by 2050 scenario were applied to the Group's Scope 1 and 2 emissions.

The Group's long-term GHG emissions reduction trajectory is assumed to progress at the same pace and scale as its existing target, resulting in a 3% year-on-year reduction relative to a 2019 base year. The full cost of carbon pricing is assumed to be paid by Rubix. Under these conditions, the annual costs for Rubix would peak in the long-term (c.2032), reducing thereafter, and from the short- to long-term horizon to 2050 never exceed the threshold of the Group's definition of substantive financial impact. The outcome of the analysis reaffirmed the importance of Rubix's current emissions reduction target as well as developing ambitious long-term emissions targets.

As part of the qualitative analyses, the Group evaluated its overall climate resilience, including the transition drivers that might be experienced from customers and suppliers under the IEA's Net Zero by 2050 scenario.



So far, internal GHG-focused initiatives have successfully reduced emissions related to fleets, warehouses, resource, and material usage, with continued expansion in the breadth and depth of these initiatives in accordance with the Group's ESG Roadmap, which includes a renewable energy strategy and net zero roadmap.

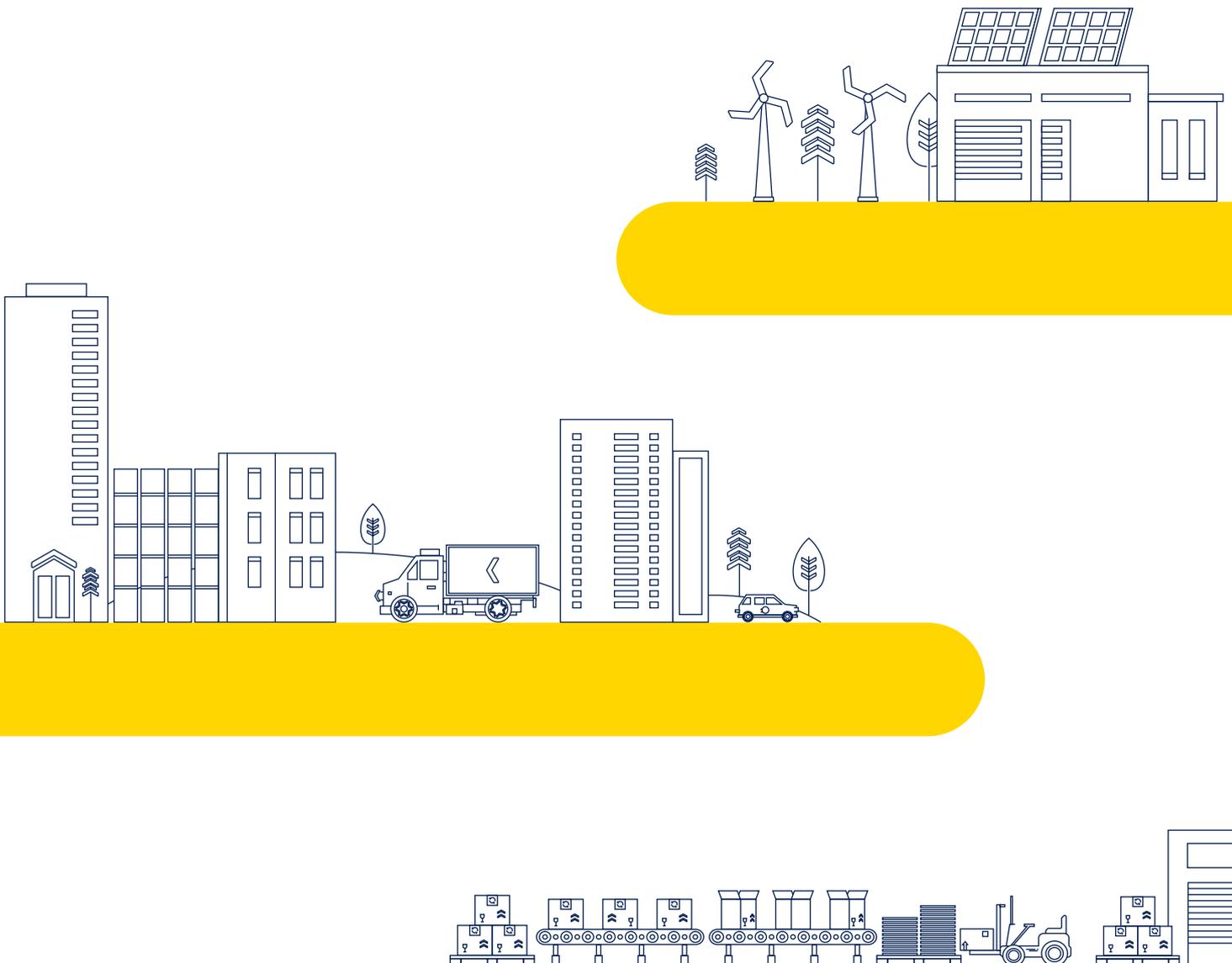
Rubix's position in the value chain provides a degree of inherent resilience to transition risks. The Group's established processes position it well to continue working end-to-end across the value chain to ensure it remains resilient to transition risks, and is able to harness emerging opportunities. Many of Rubix's key customers demonstrate mature climate strategies, and preparedness for transition risks under a net zero aligned future. As part of these strategies, there are clear indicators that suppliers such as Rubix, will become increasingly engaged on climate-related issues.





Rubix has already recognised these drivers as an emerging trend from a number of key customers. As part of its established account management processes, proactively engages with these customers on ESG, including climate-related issues, to ensure the Group continues to monitor and meet customer needs.

The most important areas in this regard are Rubix's ESG-related services, continued Group-wide climate awareness and disclosure, and demonstration of continued internal progress and overall climate resilience.





## Physical scenario analysis and outcome

To evaluate the physical risks of climate change, the Group undertook an analysis of its twenty nine National Distribution Centres (NDCs) evaluating hazard exposures under the IPCC's SSP5-8.5 and SSP2-4.5 scenarios. The NDCs were selected as the subject of analysis as they represent key operational nodes within the Group's markets. Climate-related hazards were assessed across the short- to long-term horizons, including wildfires, inland floods, heatwaves, drought, and sea level rise.

Under the highest emissions scenario (SSP5-8.5), in the short- and medium-term horizons the Group's NDC portfolio faced, overall, low exposure to all hazards assessed – notably, only two of twenty nine NDCs faced high exposure to a single climate hazard in the medium-term. In the long-term to 2050, under the highest emissions scenario, five additional NDCs were expected to face high exposure to at least one climate hazard. Under the middle of the road emissions scenario (SSP2-4.5), in the long-term the NDC portfolio faced, overall, low exposure to all hazards assessed – only two of twenty nine NDCs faced high exposure to a single climate hazard in the long-term.

The results of the analysis have provided valuable insights on when physical hazards related to climate change would be most likely to significantly manifest across the geographies in which the Group operates, and the upper bounds of its exposure according to the high emissions scenario.

Based upon the analysis undertaken, under either physical scenario applied, exposure to physical climate hazards represents immaterial risks to the Group's operations. Certain climate hazards such as heatwaves and droughts, should they occur, were assessed as unlikely to impact significantly upon NDC operations.



In the long-term high emissions scenario, rare instances of increased exposure of NDCs to sea level rise, wildfire, and inland flooding were noted. While the Group's operations are more vulnerable to such hazards, based upon the timeframes over which they would be likely to significantly materialise, the Group believes it has sufficient time to adapt if necessary.





In terms of overall operational resilience to the physical risks of climate change, several aspects of Rubix's business and operating model offer significant resilience. The decentralised nature of its operations and numerous distribution centres provides considerable built-in flexibility, generally enabling the Group to maintain the integrity of operations should physical climate events cause localised disruptions to specific distribution centres. Should chronic or acute physical climate hazards impact one distribution centre, in many cases there is capacity to rely on other local distribution centres if required. Backup power generators at many sites offer resiliency to power outages with the more operationally significant distribution centres equipped with backup generators to minimise possible downtime.

While the Group's operations are not reliant on physical IT infrastructure, the branch and digital businesses rely on IT assets in the form of ERP systems.

There are established recovery plans in place to mitigate against the risk of damage, disruptions or losses to these systems from potential climate-related events.



The Group's IT Business Continuity Plans have been recently tested and incident response teams are in place to investigate and support in the event of physical disruptions to IT infrastructure.

Physical climate hazards can impact other value chain areas, such as customers and suppliers, or logistics. As part of this TCFD reporting process, the Group undertook a screening exercise to evaluate the overall climate-related preparedness of its customers and suppliers. Rubix's highly distributed business model, with sales and procurement spread amongst customers and suppliers, provides high resiliency to indirect risks should a key trading partner be impacted significantly by physical climate hazards. In addition, the Group's logistics model is highly decentralised and operationally flexible, ensuring low vulnerability to physical climate hazards. The Group continues to review the potential for physical climate events to impact its operations, wider value chain and logistics.





## CDP

We completed our first (voluntary) submission to CDP in 2021, making us one of the few major privately-owned industrial distribution businesses reporting to CDP. Our score of B- was significantly ahead of the score that the vast majority of first-time responders receive, and higher than the trading, wholesale, distribution, rental & leasing sector average of C.



## EcoVadis

In 2021, we successfully retained our 'EcoVadis Silver' certification, with a significant improvement on our 2020 score, placing us in the 90th percentile of all the scores awarded to companies in the sector. EcoVadis highlighted the following strengths compared to other businesses assessed by it in the sector (Wholesale of other machinery and equipment):

- › Overall score in the top 3%
- › An Environment score in the top 4%
- › A top 1% placing for labour and human rights.



## Amfori

We fully support the values of sustainable trade as established by amfori and have integrated the Amfori BSCI Code of Conduct in our contracts.

We believe in and engage with the amfori values of trade with social, environmental and economic benefits for everyone.



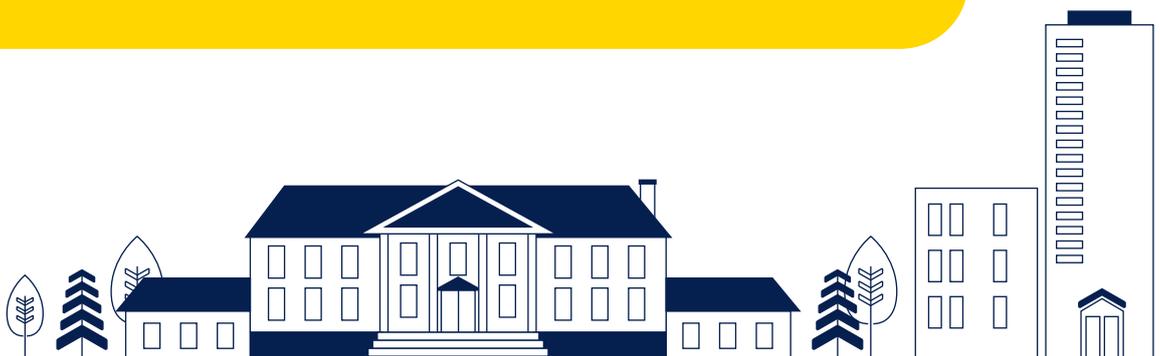
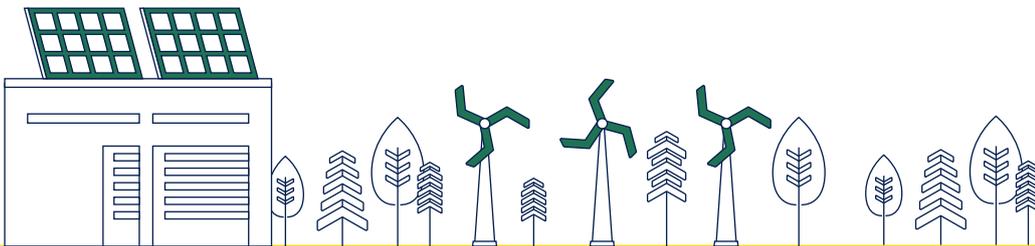
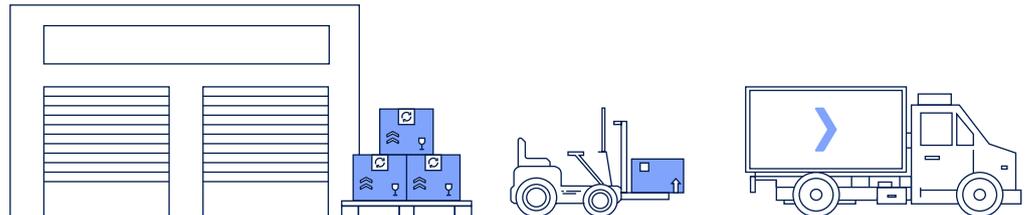


# ESG strategic focus areas

The following sections of this report address each of our ESG strategic focus areas.

1. Customers and suppliers
2. Environmental stewardship
3. People

For each focus area, we have detailed our key actions and achievements to date, and future plans.





# 1. Customers and suppliers



## Our guiding vision

To collaborate with and support our customers on their ESG journeys to achieve shared progress towards socially and environmentally responsible and sustainable business practices. To ensure that our end-to-end supply chain is aligned with our ESG principles by engaging with our suppliers.

## Our current progress

Our multi-specialist value proposition covers a wide range of value-added services that meet our customers' commercial needs. These services also play a critical role in our mutual sustainability efforts by reducing waste and maximising the efficiency of energy usage. Our services offer includes condition monitoring and maintenance services that support our customers to reduce the energy consumption of their manufacturing and processing plants. These include application engineering, automation, condition monitoring, Insite™, vending solutions, air leakage surveys and repair services.



### Insite™

These are Rubix sites on the customer's factory floor. We have over 400 in total, carrying tailored inventories and staffed with Rubix experts who can respond to production line demands in real-time. They play a critical role in reducing the frequency of deliveries to customer premises, which in turn helps to reduce GHG emissions from our third-party transport fleets.



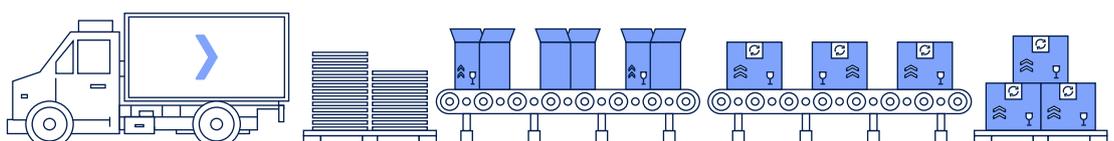
### Vending machines

Vending machines (of which we have an installed base of over 3,000 in customers' facilities) are a key tool in helping our customers manage the utilisation of consumables, including PPE items such as masks, gloves and coveralls. Consumption of single-use items is reduced through our vending machines' active monitoring and recording of usage, resulting in a direct reduction in GHG emissions associated with our customers' waste.



### Technical services

Many of our customers' production lines include the use of compressed air processes, which are frequently subject to leakage and therefore increased energy usage.





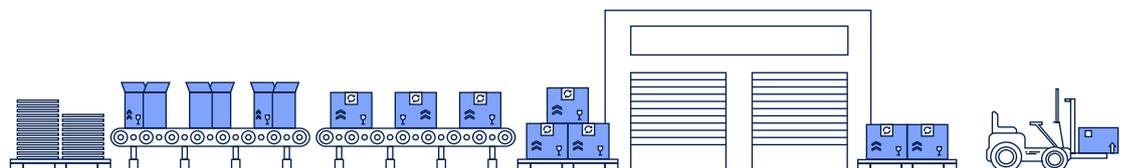
## Helping our customers reduce their Scope 2 emissions

During 2021, we launched our online condition monitoring platform that allows customers to access technical services that improve uptime and energy efficiency, and reduce their facilities' greenhouse gas emissions.

As part of this development we have begun to automate air leak surveys\* through the use of continuous monitoring sensors. These sensors replace periodic physical measurement by our engineers and give customers a real-time view of leaks in their production lines, and the opportunity to repair them before they become major issues.

We also launched an asset tracker service that enables a full inventory of critical plant assets to be monitored on the Rubix platform, thereby allowing us proactively to assess repair requirements.

\*Compressed air systems are used extensively across our customers' operations, with leaks usually the largest source of avoidable energy waste. Approximately 30% of many plants' electricity usage is typically dedicated to running air compressors, 20-40% of which is related to excess consumption resulting from air leaks. Detecting and repairing these leaks is therefore a significant driver of efficiency and GHG reduction.

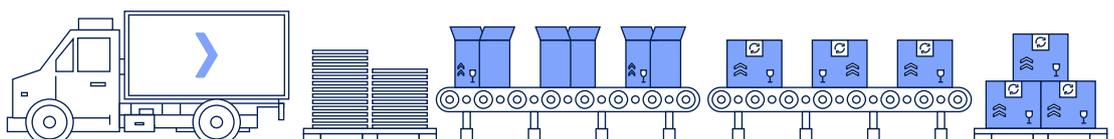
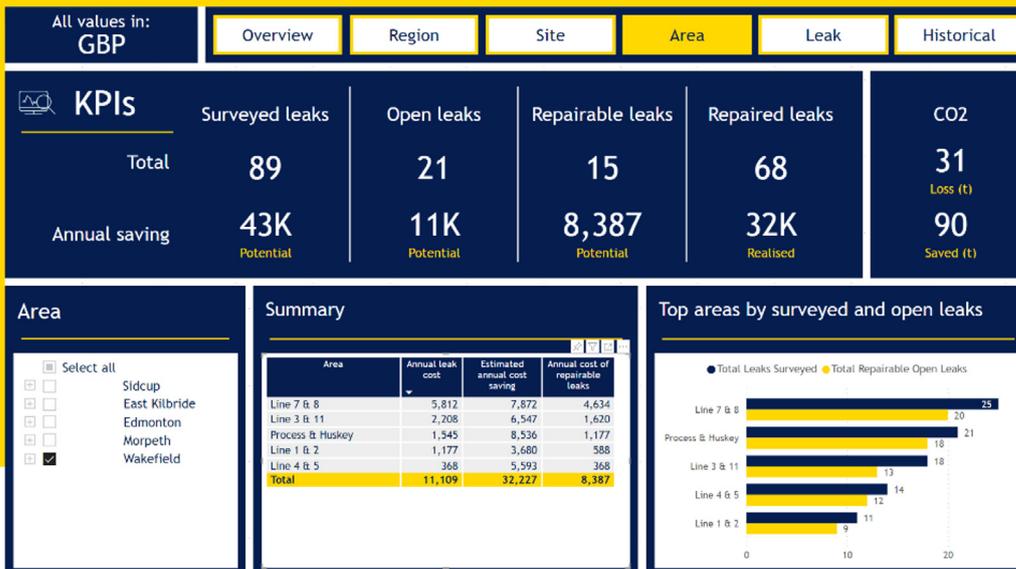
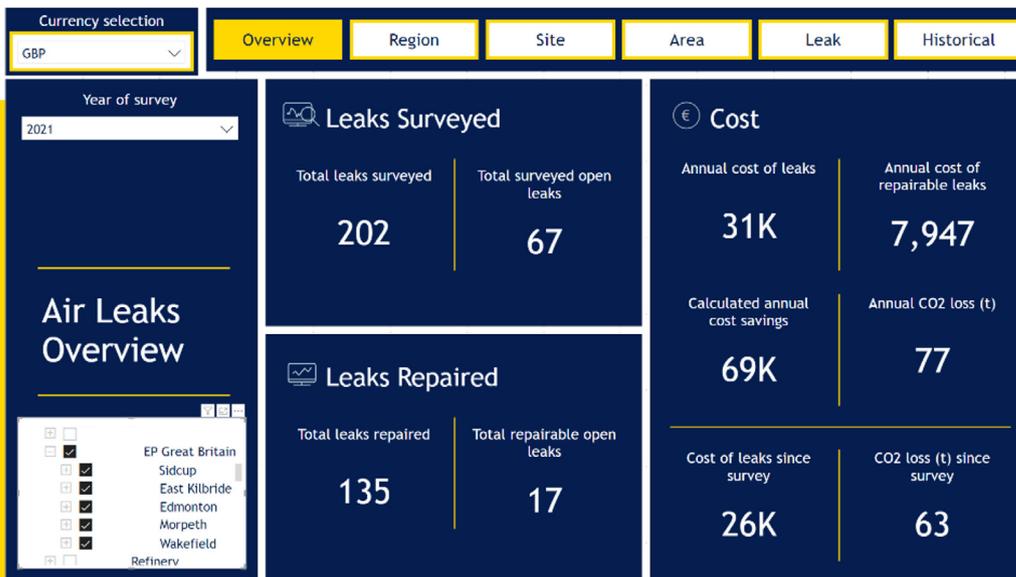




## Case study – automated air leak identification

In 2021 our air leak surveys team identified 202 leaks from compressed air systems across five sites of a UK customer.

In total these leaks represented an annual energy cost of £69k and associated CO<sub>2</sub> emissions of 77 tonnes. Of these leaks, 135 have already been repaired, generating an annual saving across this customer’s Scope 2 emissions of 51.5 tonnesCO<sub>2</sub>.





## Case study – location-based GHG footprint analysis

The automation of our GHG data collection and analysis is helping us to deliver emissions information and insights into specific customer locations. In 2021 our platform generated one such study for a UK customer's facility in which Rubix operates an Insite™.

**2021 Customer Emissions Report**

XXXXXX

Rubix | ALTRUISTIQ | 06 May 2022

### 1. Rubix Emissions Overview

Scope 1 and 2 emissions: **3,472 tCO<sub>2</sub>e** (↑ 1% YoY)  
Emissions per delivery: **TBC kgCO<sub>2</sub>e**  
Emissions per KM: **0.243 kgCO<sub>2</sub>e**

**Emissions breakdown**

GHG Scopes: Scope 1 (14%), Scope 2 (17%)

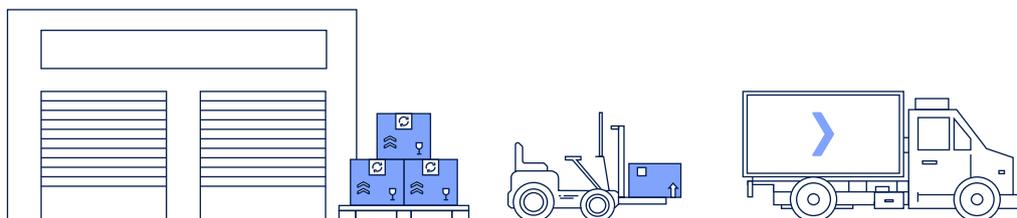
GHG Categories:

Scope	Category	TCO <sub>2</sub> e	% of Total
Scope 1	Mobile Combustion	2,873	82.7%
	Stationary Combustion	681	19.6%
	Direct Emissions	0	0.0%
Scope 2	Electricity Use	558	17.3%
	Direct Heat Use	0	0.0%
	Steam Use	0	0.0%
	Direct Cooling Use	0	0.0%

2. XXXXXX Relevant Emissions

**Emissions benchmarking**

Vehicle Type	Actual Emissions	BEES 2021 Conversion Factor	Change
Average Van (Diesel)	0.241 kgCO <sub>2</sub> e / km	0.288 kgCO <sub>2</sub> e / km	↓ 10%
Average Van (Petrol)	0.283 kgCO <sub>2</sub> e / km	0.350 kgCO <sub>2</sub> e / km	↓ 21%
Average Van (Electric)	0.078 kgCO <sub>2</sub> e / km	0.108 kgCO <sub>2</sub> e / km	↓ 27%
HDV (AI Right)	0.803 kgCO <sub>2</sub> e / km	0.980 kgCO <sub>2</sub> e / km	↓ 18%
HDV (AI Antic)	0.910 kgCO <sub>2</sub> e / km	1.080 kgCO <sub>2</sub> e / km	↓ 16%
Freight Train	0.132 kgCO <sub>2</sub> e / km	0.150 kgCO <sub>2</sub> e / km	↓ 12%





## Suppliers

As a distributor of products manufactured by thousands of companies and industrial service providers world-wide, we recognise that building and maintaining strong and sustainable relationships with our suppliers is fundamental to our long-term success.

We recognise our unique position to positively influence many different suppliers by setting and communicating our own high ESG standards. At a minimum, Rubix's suppliers are expected to comply with the Group's Supplier Code of Conduct, which helps ensure Rubix only works with suppliers that share sound ethical standards, consistent with Rubix's own corporate values.

Our Supplier Code of Conduct includes strict standards concerning human rights and employment, environment, sustainable procurement and supplier practices.

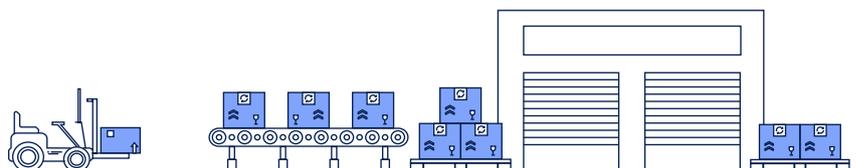
## Principles that guide our goods and services procurement

- › Setting minimum standards for energy-efficient products, such as light bulbs and electrical equipment.
- › Seeking sustainably sourced products and services.
- › Prioritising purchases from organisations that pursue social responsibility and environmental sustainability.
- › Minimising polluting activities resulting from transportation of goods.

We take active measures to integrate our ESG approach into our supplier relationships. Our key requirements are contained in our Supplier Code of Conduct. Alignment with the code is a mandatory part of all our new or renewed supplier contracts.

During 2021 we launched a comprehensive programme to assess our suppliers' ESG commitments. The programme initially focused on our Group core suppliers, 80% of whom responded positively to our initiative and returned fully completed sustainability questionnaires. We have now extended this programme to cover our local core suppliers and expect that by 2023, we will have a fully documented ESG baseline covering the vast majority of our suppliers.

In conjunction with our Scope 3 inventory build, this assessment will allow us to design effective collaboration programmes with our major suppliers, to help reduce GHG emissions across our entire supply chain.





## Our plans

Continuing to develop the customer-focused elements of our ESG strategy will enable us to continue growing sustainably and support progression against the targets set out in our ESG roadmap. Planned initiatives include:

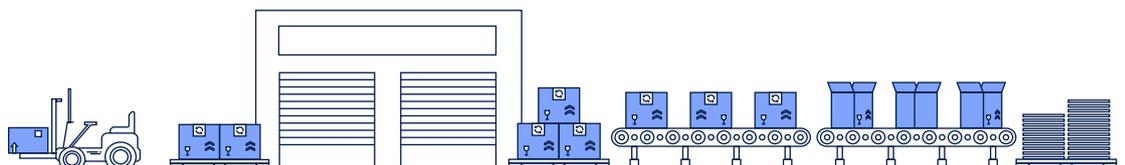
- › actively engaging with our customers to meet their sustainability-related needs
- › increasing our alignment with the ESG programmes and frameworks valued by our key suppliers
- › augmenting our existing Supplier Code of Conduct and related policies to establish a structured process for assessing the sustainability progress of our largest suppliers
- › developing and reporting on ESG-related supplier engagement and joint working programmes
- › increasing the use of our services by our customers

**We recognise our unique position to positively influence many different suppliers by setting and communicating our own high ESG standards.**



Key elements of advancing progress towards industry, innovation and infrastructure at Rubix include our ability to track the impact of those solutions that deliver environmental impact reductions to our customers. Central to this goal is our commitment to comprehensively account for our value chain (Scope 3) emissions.

A complete understanding of the emissions associated with our sold goods and other emissions related to implementing our solutions will enable us to set targets that minimise this impact and further expand our service offering of solutions that facilitate the low-carbon transition.





## 2. Environmental stewardship



### Our guiding vision

Minimise our environmental impacts, work towards sustainable and circular resource use, and achieve environmentally sustainable business operations and growth.

### Current progress

Environmental stewardship is fundamental to Rubix’s multi-specialist value proposition. Diverse sustainability-focused initiatives are embedded throughout our operations, and our goal is to further enhance this progress and build a Group-wide mitigation strategy.



#### Striving for sustainable procurement

We are expanding our use of recyclable alternatives to plastic packaging, such as jiffy envelopes with paper pulp inners, paper tape, potato starch bags, and craft paper. Our shrink wrap is selected based on its recycling properties which helps users meet sustainability policy requirements.



#### Environmental management systems

Rubix is ISO 14001:2015 accredited to demonstrate our commitment to minimising our environmental impact.



#### Reducing GHG emissions

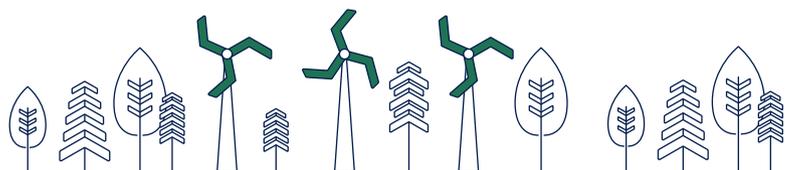
To date, our efforts on climate action have focused on accurately accounting for and reducing all greenhouse gas emissions over which we have direct control, such as those arising from our facilities, purchased fuels and electricity.

### Emissions intensity

Our emissions intensity, on a per-unit revenue basis, is one of our environmental KPIs. As we broaden our Scope 3 footprint, we will normalise our emissions intensity metric to ensure year-on-year comparability.

2021

Total Emissions (tCO <sub>2</sub> e)	21,162
Total Sales (Million EUR)	2,627
tCO <sub>2</sub> e / Million EUR	7.8





## Emissions progress

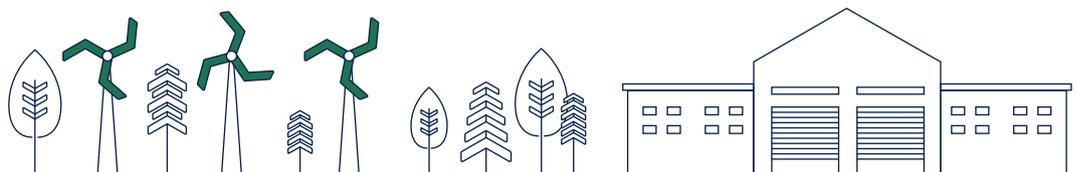
We have targeted an aggregate 15% reduction in Scope 1 and Scope 2 emissions by 2024, from a 2019 baseline of 26,705 metric tonnes. At the end of 2021, the Group's emissions were 21% below this baseline.

This target will be reviewed as the Group builds a comprehensive Scope 3 inventory through 2022 and 2023, and ahead of beginning a Science-Based Target setting process in 2023. We are confident of delivering ongoing reductions towards our target through increasingly structured efficiency programmes and elements of our multi-specialist proposition such as accelerated digitalisation.

### Rubix Group Emissions Progress Scope 1 & 2



We employ the services of an independent consultant, Altruistiq, to produce a Carbon Accounting tool to measure our global carbon footprint. Energy and fuel use activities have been tracked and GHG emissions have been estimated using the appropriate emissions conversion factors from the UK Department for Business, Energy and Industrial Strategy (BEIS) 2021 report. This work has been completed in line with the GHG Protocol Guidance and covered all the Scope 1 and 2 emissions produced by the Group.

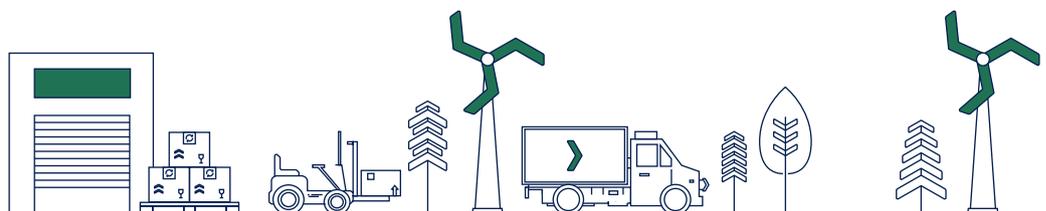
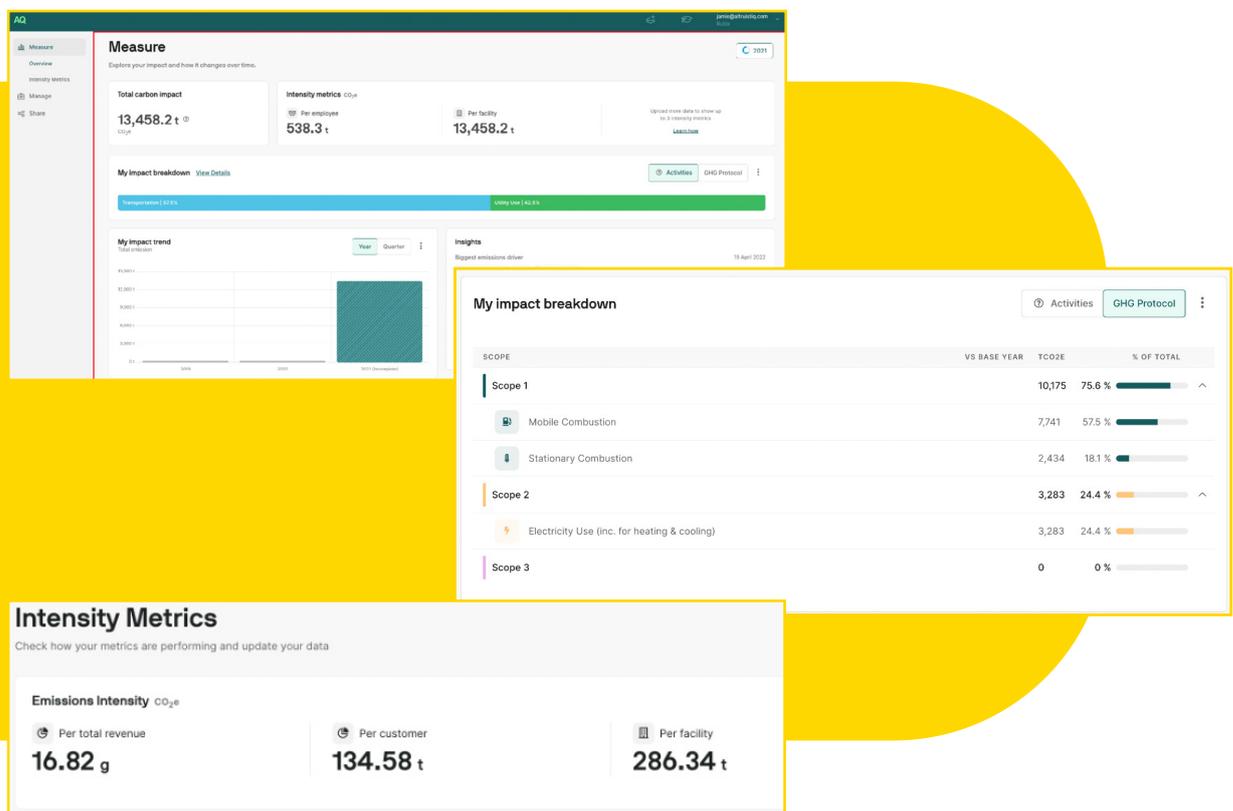




## Progressively building out an automated GHG platform

Complete, accurate and timely collection of data to measure our GHG inventory is one of our key operational imperatives. During 2021 we began the process of building an automated platform for collecting and analysing our GHG emissions, beginning with the UK. During 2022 we have begun rolling out the process across other Rubix geographies and expect that the platform will be operational across the group by the end of the year, enabling us to:

- › Accurately measure our Scope 1 and Scope 2 emissions profile on a quarterly basis.
- › Identify key emissions trends across the group's different geographies and different operating locations (e.g. distribution centres, technical engineering centres, branches and offices).
- › Proactively analyse opportunities for reducing emissions.
- › Offer customers location-specific emissions information to support their Scope 3 initiatives.

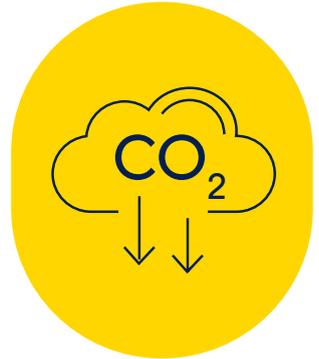




## Action on reducing our Scope 1 and 2 GHG emissions

During 2021 we continued to make progress on reducing our Scope 1 and Scope 2 emissions even as business activity rebounded strongly post the impact of COVID in 2020.

Thus while Group revenues grew by 11%, our Scope 1 emissions increased by less than 4% with Scope 2 emissions flat year-on-year. As a result our emissions intensity fell by almost 8% to 7.8tCO<sub>2</sub> per €m of revenue.



A number of initiatives contributed to our overall emissions performance:

- › Ongoing roll-out of low-energy lighting systems across our distribution centre footprint.
- › Further optimisation of route planning to reduce the frequency of customer deliveries and increased use of overnight deliveries wherever possible. We also worked with suppliers to make mutual improvements in fuel emissions and associated costs.
- › As a result, since 2019 we have reduced our mileage by over 20%, primarily by switching deliveries to direct dispatch.
- › Reduced use of packaging materials through automated packaging systems.
- › Further adoption of electric vehicles in our employee fleet.
- › The continued expansion and roll-out of our extensive suite of digital tools (e.g. webshops, scanners, PDF reader and punch-outs) reduced the need for traditional paper catalogues and associated waste generation.
- › Increasing traction from our virtual sales model which gives customers greater access to our sales teams and technical experts without the need for extensive business travel.





## We have also continued to make progress on Scope 3 initiatives, specifically waste

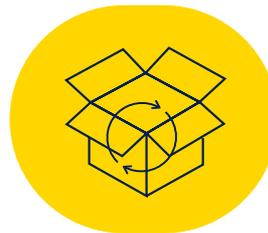
Ongoing improvements to our waste management processes: projects on innovative packaging solutions such as organic starches, and new partnerships such as our rubber recycling programme that diverts our rubber waste to industrial matting for use in applications, including playgrounds.



## Key principles of our Group policy on waste and materials

- › Encouraging the reuse and recycling of old packaging across the Group and working with local partners to ensure their waste is reused or recycled.
- › Pursuing projects to maximise internal re-use of packaging materials.
- › Maintaining centralised printing and e-business initiatives to reduce paper consumption.

100% of our cardboard is recycled through sorting and compacting on-site.



## Local waste initiatives

In the UK we have implemented an initiative to phase out bubble wrap, plastic jiffy filled bags, plastic tape, and plastic void air bags. These are being replaced by recycled materials, including brown void paper and brown or branded paper tape. This complements our boxes, which are made from recycled cardboard.

The plastic pallet wrap we use is pre-stretched to reduce the amount needed. We are seeking alternatives to plastic picking bags, which cannot currently be recycled. We have trialled potato starch bags with our network, which performed well, and we are currently investigating a new material made from flex sugar cane.

100% of our cardboard is recycled through sorting and compacting on-site, and then collected to be recycled; damaged pallets and wood packaging are repaired or recycled into wood chippings for gardens; out-of-date rubber is chipped and made into children's playground surfacing material; and used cutting and grinding discs are broken up, becoming the anti-slip additive in specialised paint coverings.





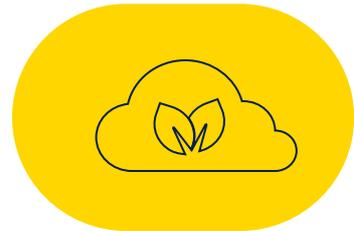
## Our plans

Following our first disclosure against the TCFD recommendations, during 2022 and 2023 we will focus on establishing a complete inventory of our Scope 3 emissions in accordance with the Greenhouse Gas Protocol and setting and verifying Science-Based Targets.

We will continue our efforts to reduce our Scope 1 and 2 emissions with a view to achieving our existing target for 2026, and we will review and update our targets as necessary according to validation by the SBTi, including targets covering Scope 3 emissions.

We will also continue to pursue renewable electricity sourcing and low-carbon options for our logistics operations and continue to drive sustainability efforts focused on materials, waste and recycling.

By 2023, we intend to complete our exploration of a net-zero emissions target roadmap.



## Long-term emissions strategy

Rubix supports the goals of the Paris Agreement and appreciates the importance of aligning the Group's long-term emissions strategy with wider global targets for net-zero greenhouse gas emissions.





# 3. People



## Our guiding vision

Maximising the well-being of our employees, investing in and supporting their professional development, and striving to build an inclusive and diverse organisation.

## Current progress

As signatories to the United Nations Global Compact (UNGC) since 2017, we have ensured these defined principles underpin our company's value system and guide our operations. We nurture and protect our employees' well-being and safety and are dedicated to their ongoing professional development to help them thrive. Below we summarise our key initiatives and policies to date, underpinning our dedication to our people.



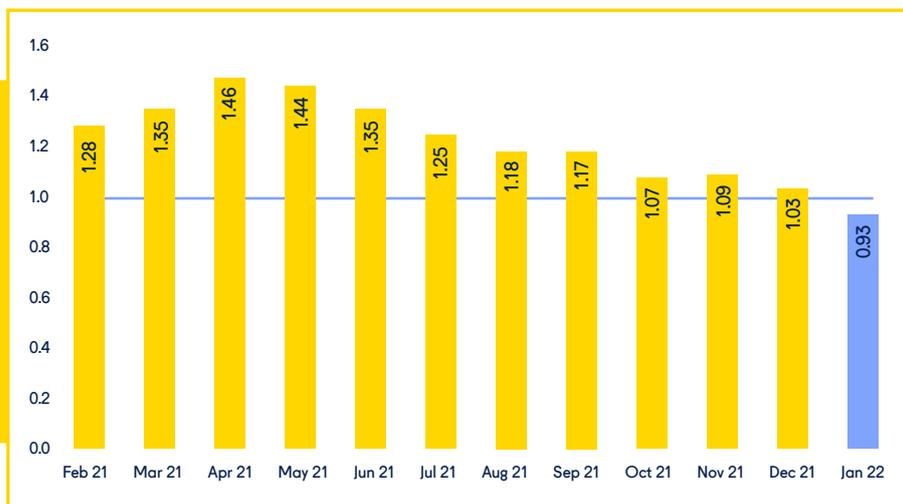
### Health and Safety Related Training

In order to mitigate risks, we provide a wide range of health and safety training including a mandatory safety awareness course that all employees must complete on joining Rubix. Specialist training modules such as the dangerous goods awareness, working at height, manual goods handling and the fire marshal course are available via the Rubix Academy.



### Key measure: Lost Time from Accidents

Lost time from Accidents (LTA) is a key Group measure that we track to ensure the effectiveness of our health and safety practices. Through the consistent application of our principles, we have recently reduced our LTA rate to our medium-term target of below 1:





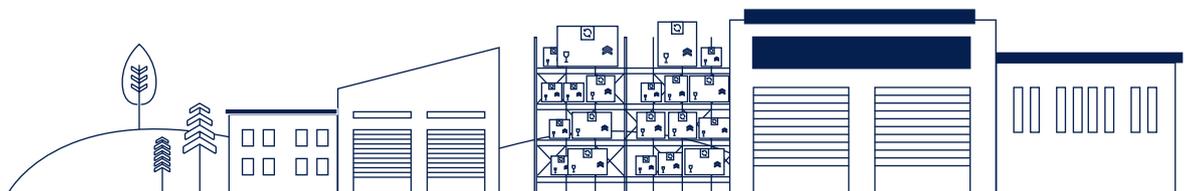
## Health and Safety Policy

Health and safety at the workplace is fundamental to the good functioning of our business. We are committed to complying with all enforceable legislations which govern safety at work, in order to guarantee a safe and healthy workplace and working conditions. In keeping with these objectives, we pledge to provide adequate and timely health and safety training to make sure our people act in accordance with health and safety requirements.

We encourage the involvement of employees in health and safety matters and aim for continual improvement through a formal structure incorporating a training, reporting and review process that ensures every employee of Rubix is aware of methods to prevent accidents and when they happen to deal with them in an appropriate manner.

The following measures are in place across the Group:

- › A respect for Health & Safety Legislation.
- › Providing and maintaining safe premises and healthy working environments.
- › Ensuring we effectively assess risks and apply measures to control them.
- › Providing and maintaining plant and equipment that is safe and without risk to health.
- › Identifying substances potentially hazardous to health and ensuring arrangements are made to control the risks they pose during handling, storage, transport and use.
- › Providing information, instruction, training and supervision ensuring everyone is able to carry out their work safely.
- › Consulting with employees on Health and Safety issues.
- › Investigating accidents, incidents, near misses and work related ill health, identifying actions that can be taken to prevent recurrence.
- › We have implemented Health and Safety Committees across all our different entities to assist in fulfilling our responsibilities in relation to health and safety matters, including occupational health.





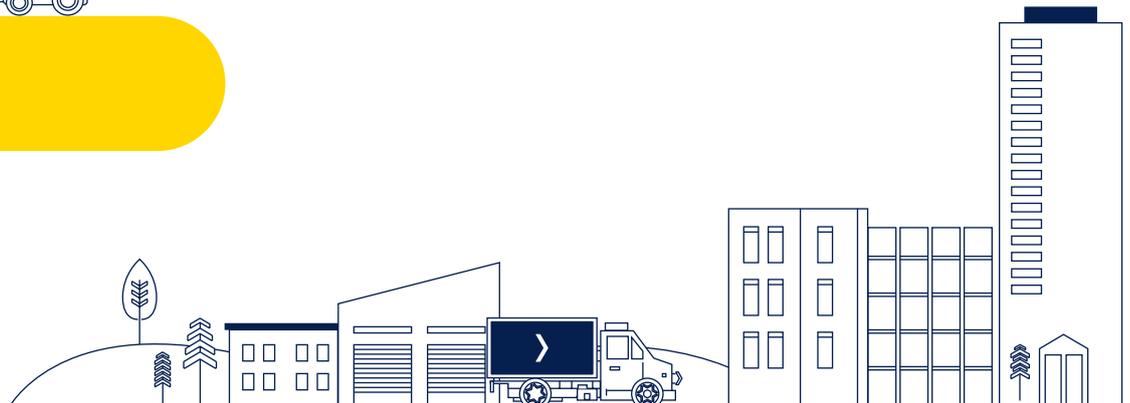
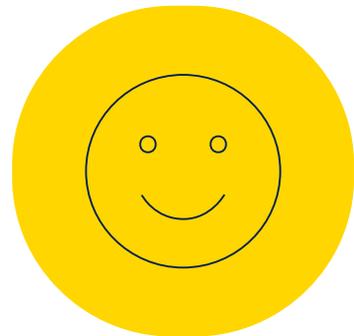
## Employee engagement

Every year, the Group conducts an employee survey that measures engagement and tracks performance against the indicators that influence it. The Group employee engagement index (EEI) score for 2021 improved to 70%, which is above the European benchmark of 60% (according to Aon), and reflects the success of our employee engagement efforts during one of the most disruptive periods in the history of the business.

The Group employee engagement index (EEI) score for 2021 was 70%, which represented a two-point improvement on 2020 and a four-point improvement since 2019.



Our employee Net Promoter Score (eNPS) also improved in 2021, to 10 which is above the European benchmark of -10 (Deep-Insight).



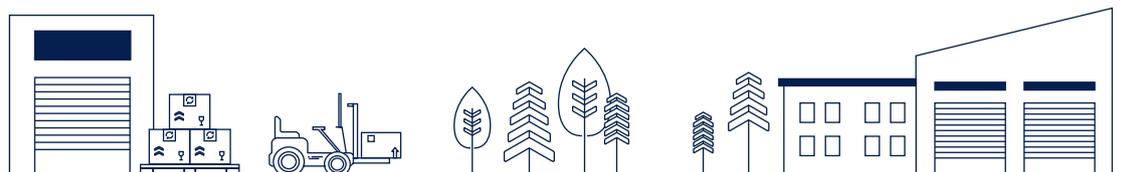


## Rubix Academy

Rubix Academy courses are available in eleven languages and are a powerful tool for our employees to develop their skills and knowledge. We constantly improve our range of available courses and improve their quality with the feedback we receive from employees.

The rate of course completion corresponds with the distribution of our workforce across the regions.

Region	2020	2021
France	417	4562
DACH	310	1747
UKII	1068	3674
Benelux	208	1073
Italy	66	1428
Spain	266	2055
CEE	129	1693
Nordics	2	110
<b>Completed Courses</b>		
Total	2,486	16,702





## Human resources policy framework

A formal human resources policy framework is followed throughout the Group. The framework includes a process of appraisal and development to ensure Group companies get the best from their people; emphasis has been placed on capability development with individual training and development programmes.



## Employment practices

The Group operates internationally, and therefore our employment practices are varied to meet local conditions and requirements. These are established based on the best practice for each market. Rubix promotes an environment in which all employees receive equal treatment regardless of their age, beliefs, ethnicity, or sexual orientation. To this end, we are committed to undertaking any discussions regarding employment in an objective fashion. Rubix welcomes the findings of the Davies Review. As of the last internal review undertaken in 2021, 26% of our general employee workforce identified as female, and 14% of senior managers identified as female.

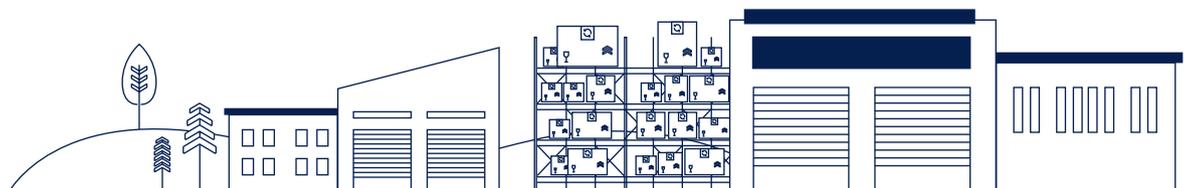
We also aim to provide fair employment opportunities for and not discriminate against people with physical or mental disabilities. In 2021, a share of 1.8% of our workforce had a disability and 0.8% of our managers.



## Labour practices policy

This covers all individuals working at all levels and grades. It promotes health and safety for our people and details our commitments to providing a safe working environment, providing training where necessary to build our employees' skill base, creating new jobs through sustainable growth, and providing opportunities to develop all of our people to their potential. So far, we have achieved:

- › best-in-class engagement levels
- › open, merit-based recruitment opportunities.





## Employee representation

Around 60% of our workforce is covered by collective agreements with unions and works councils, which is primarily driven by operations in France, DACH and Benelux. The UK business has employee forums, which meet on a monthly basis, providing a valuable contribution to improving communication from the top-down and bottom-up, supporting our management teams with problem-solving and implementing new ideas and new ways of working. In Italy, around 10% of the workforce are union members and, although there is no collective agreement, Italian management attends quarterly meetings (on request from the unions and on a goodwill basis) to discuss key decisions related to employees.



## Diversity

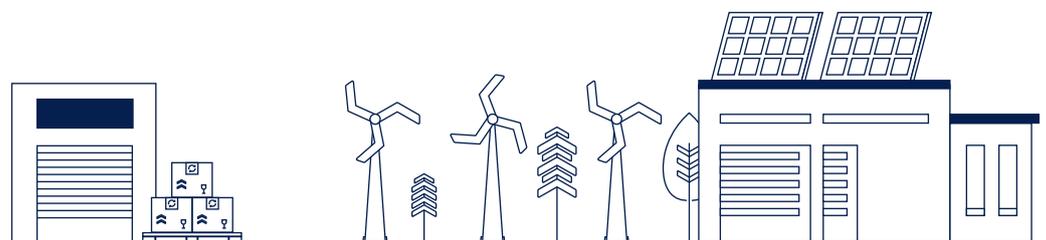
We recognise the value of a diverse workforce. Our objective is to maintain an inclusive environment where our colleagues can make the best use of their skills, free from discrimination or harassment. We recruit, train, develop and reward employees based on merit, regardless of gender, ethnic origin, age, religion, sexual orientation, gender identity, disability, or any other factor unrelated to performance or experience.



## Recruitment and Selection

We do not discriminate (or permit discrimination) against staff, visitors, customers, job applicants, suppliers, former staff members and other third parties on any basis. Recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. We take steps to ensure that its vacancies are advertised to a diverse labour market.

Year	General Workforce		Management	
	Male	Female	Male	Female
2021	74%	26%	86%	14%
2020	74%	26%	87%	13%
2019	73%	27%	88%	12%





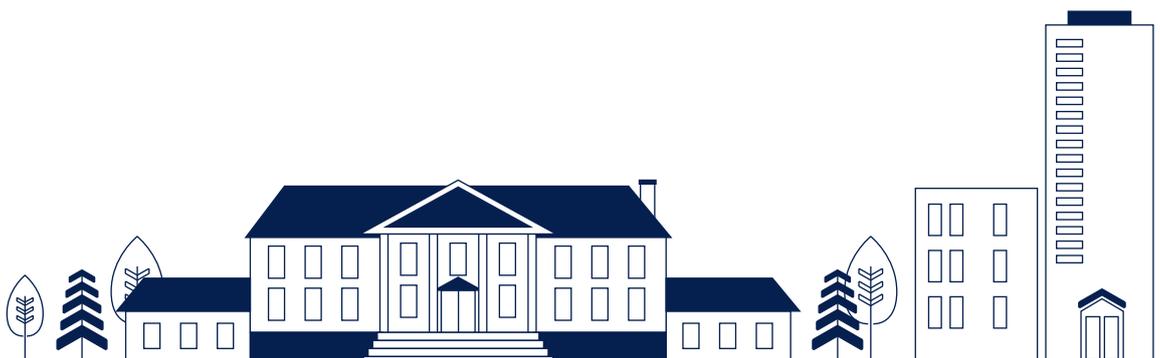
## Our plans

We are committed to promoting equal opportunities across the company to build a diverse and inclusive organisation across all levels of decision-making. Our plans to increase the diversity and inclusion of our workforce are long-term in nature. We are currently focused on ensuring that our succession, promotion and recruitment processes support our objective to make further progress on gender diversity.

Our plans to advance our efforts and support the goal of decent work and economic growth include:

- › Aiming for zero preventable accidents from 2022 onwards, alongside the continued rollout of a fully integrated approach to health and safety tracking and reporting across all of our geographies.
- › Ongoing development of the Rubix Academy, developing multilingual courses and extending course delivery across our global geographies of operation sustained company commitment to principles outlined in the UNGC.

We are currently focused on ensuring that our succession, promotion and recruitment processes support our objective to make further progress on gender diversity.





## ESG governance framework

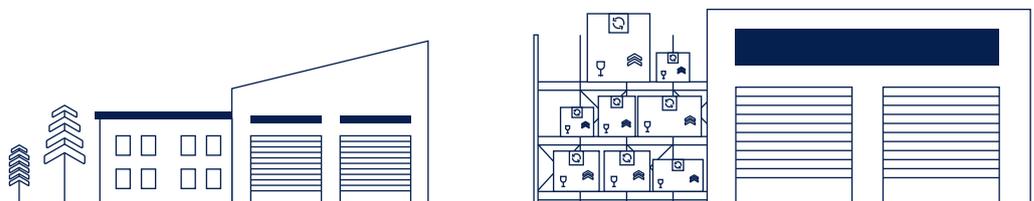
Rubix's executive board, led by the Group CEO, is ultimately responsible for oversight of and accountability for the Group's ESG strategy, with the managing director of services responsible for executive sponsorship of ESG.

The ESG committee, led by the MD of services and Group sustainability director, is responsible for defining and delivering the Group's ESG strategy through the ESG leadership team which comprises Group function heads, and country-specific ESG representatives.



## Key responsibilities of the Rubix ESG leadership team

- › Data: establishing, standardising, and driving ESG-related data-collection processes across the group.
- › Initiatives: identifying, prioritising, and driving the adoption of ESG initiatives and improvement measures across the group.
- › Knowledge: internally sharing ESG best practices and local initiatives between regions.
- › Culture: continuing to promote a group-wide culture that integrates ESG into all aspects of the business.





# Additional information





# Policy framework

## Labour Practices Policy

This policy reflects our commitment to provide a safe work environment; long term opportunities; adequate training where necessary to build our employees' skill base; a system of work through which front line employees can communicate easily with senior management; opportunities to develop all of our people to their full potential as well as to create new jobs through sustainable growth.

## Recruitment Policy

This policy ensures that the best employees are brought into the company by taking a consistent and fair approach towards the evaluation of applicants.

## Paternity and Maternity policies

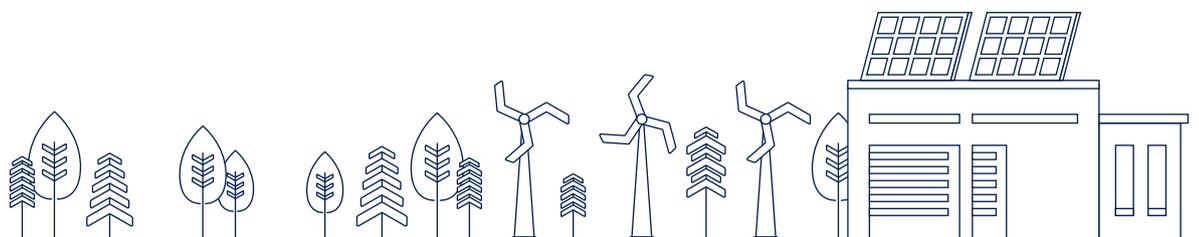
These policies are in place to support colleagues in balancing professional and personal commitments by following relevant legislation and include maternity and paternity leave, shared maternity and paternity leave as well as adoption leave. In addition we have successfully implemented a Flexible Work Policy that accommodates a variety of working patterns to help improve employee wellbeing, engagement and retention.

## Dignity at Work Policy

This policy sets out Rubix's ethos that each employee has a right to work in a safe and supportive environment. Rubix recognises and respects the legal and moral rights of all persons affected by its operations and is committed to providing a working environment free of harassment, discrimination and prejudice.

## Modern Slavery Act Transparency Statement

This sets out the steps that we take to address the risk that slavery and human trafficking might be taking place in our supply chain or within Rubix's business. We have rigorous management-approved policies and processes in place to help deliver our commitment to avoiding this.





# Policy framework

## Supplier Code of Conduct

This code ensures that our suppliers share our commitment to regulatory compliance, human rights, business ethics and environmental sustainability. The majority of Rubix's products are sourced from leading global manufacturers within Europe who adopt and monitor adherence with the high standards that we expect of them. We regularly monitor compliance with the requirements of our code of conduct.

## Whistleblowing Policy

This policy allows employees to voice compliance related concerns in a responsible and effective manner helping Rubix prevent and detect serious malpractice or wrongdoing, particularly in relation to corruption, harassment, and abuse of power.

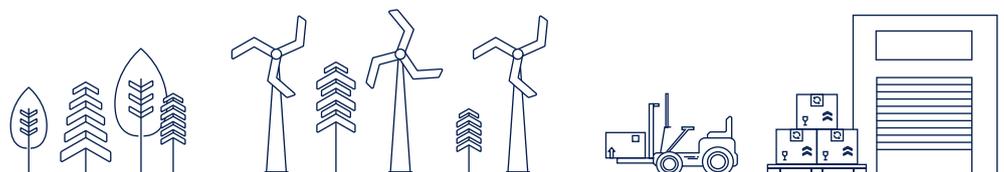
## Conflicts of interest

Conflicts of interest are monitored by our Internal Audit function with annual declarations required by our entire senior leadership team. In acquired businesses, all former owners who remain employed by the Group are also required to complete a conflict of interest form. In 2021, 211 managers completed a form, of which 176 were nil declarations and 35 identified a potential conflict.

## Information Security

This policy provides the guiding principles and responsibilities necessary to safeguard the security of our information systems. Rubix is committed to preserving the confidentiality, integrity and availability of documentation and data processed by third parties. This framework is supported by the Privacy Standard, which fulfils the GDPR requirements of the European Union.

We have established a General Data Protection Regulation (GDPR) group which meets regularly to continually review and assess the effectiveness of data privacy policies. The group is chaired by the IT director and is attended by representatives from IT, legal, internal audit, HR and a GDPR subject matter expert.





# Policy framework

## Information Classification Policy

Our Information Classification Policy establishes a framework to ensure private data is handled in a secure manner across all Rubix's networks, with safeguards in place for sensitive data and other information assets to protect against unauthorised access and compromise or disclosure. In 2021, our training on information security was completed by 5,394 employees.

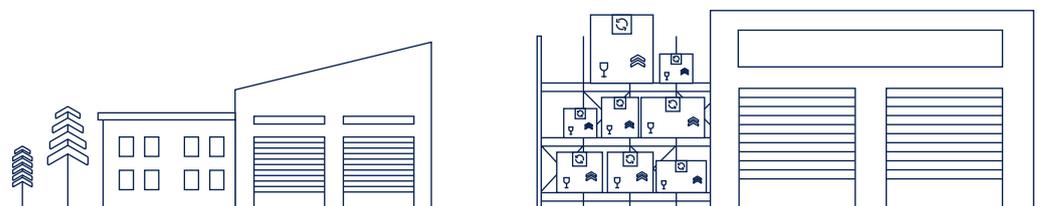
## Security Risk Mitigation

The Group has a dedicated IT security function which works in collaboration with in-country resources to maintain the technical and administrative controls around the security of IT assets, including data. These measures include a comprehensive suite of enterprise IT security policies, procedures and standards; technical security controls for email, servers and PC's to help detect and prevent cyber-attacks; regular cyber risk awareness and cyber threat bulletins; and regular vulnerability assessments, penetration tests and a 24/7 Managed Detection and Response (MDR) service to react to active cyber threats. We have also established a cross functional Cyber Security Incident Response Team in order to respond to suspected data privacy threats. Data privacy threats are also formally recorded in the Group's risk management framework.

The Group's cyber incident response plan includes external cyber legal counsel and incident response vendors that can be mobilised rapidly. Furthermore, in the event of in-country order fulfilment or distribution being impacted there is a Group order management platform that could help to mitigate sales and supply chain operations. The Group is also implementing a country level cyber security programme with defined KPIs to drive improvements in technical and administrative security controls, and to highlight any areas of concern at board level. In 2021, we did not need to report any data breaches to local GDPR authorities.

## Hazardous Waste

We acknowledge that hazardous waste has huge negative effects on the environment. In addition to our efforts, to minimise such waste, we have processes in place to handle all hazardous waste with the necessary responsibility and caution, transferring it to an authorised disposer and controlling this process constantly.





**RUBIX**