Group Environmental Management Policy

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Contents

Introduction

Gamma recognises the increasing risks climate change poses and understands that we have a responsibility to act. Our products enable people to meet and communicate remotely, therefore providing the ability to better manage their environmental impact by avoiding unnecessary travel. However, we recognise that our business has some negative impacts on the environment and this Environmental Management Policy describes the steps Gamma is taking to reduce its impact. Environmental management is a sub-set of Gamma's Environmental, Social and Governance (ESG) programme.

The policy outlines the environmental management controls put in place to reduce the negative impacts that Gamma has, the steps we are taking to fully understand the impact that we have on the planet, and our environmental management systems to enhance and maximise our environmental performance.

This policy underpins our commitment to UN SDG 13: Take Urgent Action to Combat Climate Change and its Impacts[1].

Scope of policy

This policy relates to the Gamma Group, and extends to all workplaces, employees and others impacted by our operations. Our objective is to integrate the assessment, management, and control of environmental impact into the decision-making process as early as is reasonably practicable. Gamma will seek to consistently apply this policy to ensure that the environmental impacts of strategic business decisions are assessed, understood, and mitigated.

Policy statements

Gamma's Group Ethical Conduct Policy states that the Board of Gamma ("the Board") intends that Gamma be a positive contributor to society as a whole, to the UN Sustainable Development Goals, to our employees, customers, suppliers, shareholders and other stakeholders, and to the environment. Gamma will;

1. Aim to reach Net Zero by 2042 following a science-based target approach. This will require a 90%+ reduction in total emissions from the 2021 baseline, and require reaching key interim targets along the way. Until the point at which only residual emissions are being produced, Gamma will remain Carbon Neutral certified, increasing the scope in line with our data collection maturity.

2. Ensure that all strategic decisions are made taking into account our desire for continual improvement in our environmental performance.

3. Regularly assess environmental and climate related risks and opportunities that could impact on our business strategy and planning and disclose these as appropriate.

4. Communicate our commitment to environmental management publicly.

5. Monitor appropriate measures and metrics and set targets wherever reasonably practicable to underpin the delivery of our commitments to reducing our environmental impact.

6. Measure our GHG emissions annually and commit to improve energy management performance over time and in line with our Net Zero plan.

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[1] Goal 13 | Department of Economic and Social Affairs (un.org)

7. Monitor and manage our waste effectively, including the certified disposal of network assets via the Waste Electric and Electronic Equipment Directive (WEEE Directive) and through the separation of recyclable and non-recyclable office waste materials.

8. Understand the impact our direct supply chain has on the environment through our Ethical Procurement Policy. Detailed performance standards are a matter for suppliers, but all suppliers covered by our Ethical Procurement Policy are expected, as a minimum, to comply with all statutory and other legal requirements relating to the environmental impacts of their businesses.

9. Provide appropriate training in environmental issues for our employees, according to their role, the work they undertake and their environmental responsibilities.

10. Work to prevent pollution, wherever practical.

11. Be transparent and proactive and disclose the key metrics which we use internally to measure our own impact on the environment.   These disclosures will be made available to our investors, partners, customers, employees and broader community through our Annual Reporting cycle and other disclosure mechanisms.

12. At minimum, comply with all statutory and mandatory requirements. Assess the applicability of voluntary compliance obligations and adhere to all requirements under the ISO14001 framework. Gamma intends to remain ISO14001 certified.

Roles and Responsibilities

The ESG Committee

The main purpose of the Committee is to represent the board in defining the Company's strategy relating to ESG matters and to review the practices and initiatives of the Company relating to ESG matters, while ensuring they remain effective and up to date. It oversees the development of the Group's ESG strategy and makes recommendations to the board regarding it. It also oversees the establishment of policies and codes of practice and their effective implementation.

ESG Committee Terms of Reference

ESG Steering Group

The ESG Steering Group consists of Senior Leadership Team members who are responsible for implementing the ESG strategy and related policies, including environmental matters. The Group is chaired by the Group Operations Director and meets monthly.

The ESG Steering Group reports to the ESG Committee and has the following responsibilities:

a. Implement the recommendations of the ESG Committee and the senior leadership team regarding ESG.
b. Build an external perspective by exploring investor preferences, disclosure levels of other relevant companies, customer standards, and employee and prospective employee perspectives.
c. Ensure group ESG policies are proportionate with Gamma's business priorities and cultural dynamics.
d. Nurture a positive culture of transparency and adoption towards ESG matters.
e. Propose & agree targets and related planning.
f. Ensure Gamma can fulfil mandatory and desired levels of disclosure.
g. Agree matters for approval / sponsorship by the ESG Committee and Gamma senior leadership team.
h. Monitor ESG related risks and market opportunities and agree associated planning.

ESG Working Group

The ESG Working Group has been established to develop and support the activities relating to the Environment, Social and Governance programme across the UK and Europe.

The ESG Working Group typically meets on a monthly basis and its terms of reference are as follows:

a. The ESG Working Group shall carry out the specific work of ESG management under the guidance of the ESG Committee and the ESG Steering Group.
b. The ESG Working Group is a cross-functional group representing Finance, Procurement, Facilities, Gamma People, Operations, Products & Marketing, with members from all of our businesses in the UK and Europe.
c. The ESG Working Group will help to formulate and implement specific ESG work plans based on agreed ESG objectives.
d. The representatives on the working group will help to shape activity from their area of expertise and contribute to the delivery of the wider ESG plan.
e. The members of the ESG Working Group will take ESG best practice back into their functional areas with the aim of embedding awareness into everyday business activity.

Environmental Data Manager

The Environmental Data Manager should ensure that all data relevant to Gamma being able to monitor its environmental impact is identified and collected, and report on all environmental matters to the relevant internal groups. They will also provide reports so that the ISO 14001 framework can be effectively scoped and managed. The manager will also ensure the right data is provided for Gamma to remain Carbon Neutral and to inform our efforts to become carbon net zero.

Group Procurement

Gamma's Procurement strategy aims to take account of any environmental damage and always comply with legislative and regulatory requirements. The procurement team will set expectations of the Gamma supply chain to inform suppliers covered by the policy that they are expected to address:

a. Waste Management
b. Packaging and Paper
c. Conservation
d. Energy Use
e. Energy Procurement
f. Conflict Minerals
g. Carbon Footprint

Gamma's Governance Approach

Gamma's approach to governance is to ensure the right internal controls are in place to comply with local law and underpin internal policy and standards. We have dedicated individuals who will support environmental management by ensuring we have the right structure to support reporting, both internally and externally. Those individuals will provide oversight and internal audit for the ISO14001 and Carbon Net Zero programmes.

Gamma Employees

Gamma employees make decisions daily, and the expectation is that in line with Gamma's core values, employees 'Consider Others' and reflect on the impact their decisions have on the environment. The decisions made and actions undertaken by our employees will directly influence the success of our Carbon Net Zero ambition.

To enable more informed choices and decisions, Gamma will provide relevant mandatory training and communicate specific environmental campaigns on a regular basis.

Governance and Reporting

Gamma Board
- ESG Committee report on the progress made against the Gamma ESG plan to the Board

ESG Steering Group
- SLT and Director report on output of Group to the ESG Committee

ESG Working Group
- Carry out the specific work of ESG management under the guidance of the ESG Committee and the ESG Steering Group.

Environmental Manager
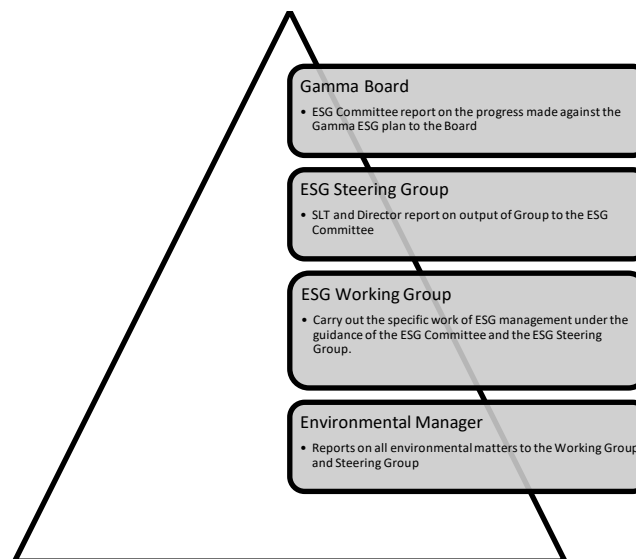- Reports on all environmental matters to the Working Group and Steering Group

Figure 1: Gamma Environmental Governance Structure

Policy Communication

This policy statement will be maintained as documented information, be communicated within the organisation, be available to interested parties and published on our website

The Environmental Management Policy document will be monitored for improvement and formally reviewed every 12 months. In exceptional circumstances this Policy may be amended as required by changes in legislation or work practices.

Glossary of Terms

| Environmental | the Company's impact on the natural environment and its response to the challenge of climate change including; greenhouse gas emissions, energy consumption, generation and use of renewable energy, biodiversity and habitat, impact on water resources and deforestation, pollution, efficient use of resources, the reduction and |

management of waste, and the environmental impact of the Company's supply chain.

Social

the Company's interaction with employees, other stakeholders and the communities in which it operates and the role of the Company in society including; workplace policies (e.g. employee relations and engagement, diversity, non-discrimination and equality of treatment, health safety and well-being), ethical/responsible sourcing and social aspects and labour standards of the supply chain (including child labour and modern slavery), and engagement with and contribution to the broader community through social projects and charitable donations.

Corporate Governance and Behaviour

the ethical conduct of the Company's business including its corporate governance framework, business ethics, policies, and codes of conduct (e.g. related to donations and political lobbying, bribery and corruption), and the transparency of non-financial reporting.

Reviewed: 21 January 2022