



Nasstar ESG Framework

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1 Version Control

Current Version

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Version History

Version	Date	Author	Description of Changes
Draft	09/06/23	GMT	New ESG framework drafted to underpin Nasstar's commitment to delivering ESG practices.
0.1	09/07/2023	GMT	Amends made following internal stakeholder feedback.
0.2	20/07/2023	GMT	Document review completed by internal ESG stakeholders, Equity Partners and Nasstar Legal. Submitted for formal approval to release.
0.3	27/07/2023	GMT	Document approved for publication by CEO.

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Any suggested changes or amendments must be communicated through the author for consideration and inclusion if suitable.



2 Scope

This Environment, Social and Governance (ESG) Framework applies to Nasstar Group Ltd (including Modality and Nasstar) hereafter referred to as 'Nasstar' or the 'Group'.

This ESG framework applies to all Nasstar employees, whether permanent, temporary or contractors, along with any other appointed representatives, regardless of their geographical location.

2.1 Out of Scope

No elements of Nasstar operations have been deemed out of scope of this ESG framework.

2.2 Audience

The intended audience for this ESG framework is all Nasstar employees, appointed representatives, customers, and other interested parties. It is made available internally via the Nasstar Policy Office and externally via the Nasstar website.



3 Statement of Purpose

As an organisation, Nasstar firmly believes that operating a business goes beyond financial success; it entails a deep responsibility towards the environment, society, and our stakeholders. To support this belief, Nasstar is committed to incorporating Environmental, Social and Governance (ESG) considerations into its business strategy and operations, embodying sustainability, ethical practices, and transparent governance.

We recognise that our planet's resources are finite, and it is our responsibility to ensure they are used in a responsible and equitable way for the benefit of current and future generations.

Nasstar recognises that our collective actions have an impact on the world around us and we strive to be responsible corporate citizens, making decisions that benefit not only our owners, but also our employees, customers, communities, and the planet.

We passionately believe that by prioritising ESG factors, we can unlock genuine business improvements, create long-term value for all stakeholders, and contribute to a more sustainable future for all.

By adhering to our ESG principles and integrating sustainability into our core values and practice, we strive to be a catalyst for change, building a resilient and sustainable organisation that delivers value not just for our shareholders, but also for the planet, society, and future generations.

Together, we can drive positive change and create a better world for all.

3.1 Environmental Stewardship

We are committed to minimising our ecological footprint and reducing our carbon emissions through efficient resource management, renewable energy adoption, waste reduction and responsible sourcing.

At Nasstar, we are committed to preserving and protecting the environment for current and future generations by:

- Working from greener offices, which means paperless working, LED lighting, energy-efficient computer savings, and no single-use plastic.
- Maintaining and continually improving our ISO 14011:2015 certified Environmental Management System (EMS) to empower our people to understand how as individuals they each uniquely have the responsibility to play their part in reducing our collective greenhouse gas emissions.
- Continuing with Streamlined Energy Carbon Reporting (SECR) and the Energy Savings Opportunities Scheme (ESOS) reporting.
- Delivering regular training and awareness campaigns throughout the year to promote & embed key initiatives, principles, and actions that we can all undertake to reduce our environmental impact.
- Committing to achieving Net Zero carbon emissions by 2050 in line with the UK Government Climate Change Act. This is achieved via multiple strategies and approaches and Nasstar's evolving Decarbonisation Plan.
- Sending zero waste to landfill by embedding recycling systems across the organisation and partnering with an environmentally responsible third party for the disposal of our waste. Nasstar receives annual reports breaking down our waste disposal and the volume of waste sent to landfill by our partner.
- Removal of data centres and Points of Presence (POP) sites in favour of public cloud alternatives using energy-efficient infrastructure to reduce our carbon emissions.
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- Supplier due diligence to ensure we work with partners that can demonstrate their own environmental initiatives and share our ambition and ethos to minimise our joint environmental impact.



3.2 Social Impact

We value people as our greatest asset and prioritise their well-being. Nasstar fosters a diverse and inclusive work culture that respects individual differences, promotes equal opportunities, and ensures the health, safety, and fair treatment of our employees.

At Nasstar, our social responsibility agenda is simple: to deliver innovative and sustainable technology solutions that benefit everyone, while striving to achieve equality for each person who interacts with our business.

Our customers, employees and communities are the cornerstones of our business and we're committed to delivering value for them while ensuring we act as a responsible business leader at every opportunity. We make it our priority to protect their well-being and safety, fostering a culture of respect, fairness, and equal opportunities.

Like many technology businesses, it's important for us to recognise the impact we are having both on the environment and the wider community. With this information, we can improve our business and processes, give back to causes that matter and ensure our organisation is constantly learning and evolving across several important initiatives.

Supporting our local communities and delivering lasting change to larger charities is something we encourage across our workforce, in addition to the financial contributions we make on behalf of the business. We engage with our workforce to select charity partners that share our values and mean something to our people and the causes we collectively care about.

At Nasstar, we are committed to:

- Delivering Equality, Diversity, and Inclusion training to our employees, based on real-life lived experiences to help address the potential for unconscious bias across our organisation, and to support the open culture we pride ourselves on.
- Promoting empowerment and equality by ensuring each individual within the business has a voice and feels enabled to share their unique experiences, background, and differences in a fully supportive environment.
- Diversity & Inclusion Employee Resource Group
- Training mental health first aiders across the business and empowering them to take the time needed to support colleagues with the challenges they face.
- Donating 120 days per year of voluntary time, enabling our employees to take time out to volunteer for charitable causes close to their hearts, fully paid for by Nasstar.
- Embracing Hybrid Working to ensure a strong work/life balance for our employees, providing the freedom of choice to manage the home and office working split that aligns with their individual needs, whilst delivering business outcomes.
- Ensuring that Nasstar protects the health and safety of our employees, customers, contractors, and other visitors is of paramount importance. Nasstar's offices, locations and working practices worldwide adhere to the company's Health & Safety Policy and all supporting documentation.
- Developing business relationships with only those partners that perform their business activities in full compliance with the laws, rules and regulations in place and that conduct their business in ethical and socially responsible ways. This includes the management of Modern Slavery and Human Rights Risks to ensure that our chosen partners have appropriate control mechanisms in place to ensure there is no modern slavery or human rights abuses within their value chain.

3.3 Governance Excellence

We uphold the highest standards of corporate governance and ethics. Nasstar maintains a robust governance framework that fosters accountability, transparency, and integrity throughout our organisation. Top Management, Senior Leaders and Employees are guided by ethical principles, ensuring that responsible decision-making is central to everything we do.

Nasstar is committed to:



- Embedding the strongest principles of business ethics across the organisation in all decisions and operations, ensuring compliance with all legal and regulatory requirements within which we must operate. This includes:
 - Taking a zero-tolerance approach to bribery and corruption; we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, implementing and enforcing effective systems to counter bribery.
 - Operating a zero-tolerance policy towards criminal tax evasion or tax fraud and the aiding, abetting, counselling, procuring or other forms of facilitating another to evade tax or commit tax fraud.
 - Operating a transparent Whistleblowing Procedure, ensuring our employees can raise concerns if they have reasonable grounds to believe any serious malpractice or business misconduct is taking/has taken place.
 - Adopting zero tolerance to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour within our supply chain.
 - Proactive management of our supply chain ensuring that all parties acting on behalf of Nasstar in any capacity maintain the same principles, ethics, and ethos as us.
- Maintaining an integrated Business Management System (BMS) covering the whole organisation, locations, products, and services certified to:
 - ISO 27001:2013 Information Security Management System,
 - Cyber Essentials Plus,
 - ISO 9001:2015 Quality Management System,
 - ISO 20000-1:2018 – IT Service Management System,
 - ISO 14001:2015 – Environmental Management System
 - Business Continuity Management System adopting the best practice principles of ISO 22301:2019, with the roadmap to full certification to this standard by the end of 2024.

3.4 Stakeholder Engagement

Nasstar recognises that our success is intertwined with the interests of our stakeholders. We actively engage with stakeholders, customers, suppliers, and partners, seeking open and transparent dialogue. We listen to their concerns, incorporate the feedback, and strive to create a sustainable future that aligns with their expectations.

We understand the genuine value of transparent stakeholder engagement, and its crucial role in building trust, managing risks, and achieving sustainable outcomes. By actively involving stakeholders, Nasstar promotes shared value creation.

At Nasstar, we are committed to:

- Monthly staff surveys to ensure our employees are heard and that we collectively understand what is going well within the business and what needs to improve. Nasstar's People & Culture

Team collate the feedback from these surveys and identify areas for improvement, which are actioned as appropriate.

- Regular contact with our key suppliers and partners to review how we collectively work and how we can identify and drive further improvements and efficiencies.
- Ongoing transparent dialogue with our customers to ensure we continue to deliver best-in-class service. We pride ourselves on taking decisive action in any instance that we dip below our highest standards.
- Actively listening to stakeholder perspectives, concerns, and needs, and responding in a timely and meaningful manner. This includes demonstrating empathy, taking stakeholder feedback into account when making decisions, and addressing any issues or grievances raised by stakeholders promptly and transparently. By being responsive, Nasstar builds stronger relationships with stakeholders and fosters a culture of trust and respect.



3.5 Continuous Improvement

Nasstar is proud of its culture of continuous improvement and development embedded across all aspects of the business. This ethos of continual improvement is not limited to the ESG practices but is embedded into our Integrated Business Management System and our day-to-day business operations.

We set ambitious goals, regularly monitor and assess our performance, and transparently share our progress with key stakeholders and interested parties. Through innovation, collaboration, and the adoption of best practices, we strive to evolve and lead the way in sustainable business practices.

3.6 Authorisation

Paul Cosgrave

Chief Executive Officer



