

# **Sustainability Policy**

#### **Our Business**

SIFA Strategy ('SIFA', 'we', 'our') is a specialist consultancy. We work to facilitate the understanding, implementation, and embedding of ESG within private and public companies. Our team of senior consultants work at Board, committee, and management levels, supporting and challenging our clients to approach the material elements of ESG and sustainability as part of their operational and financial-decision-making, as well as a factor of compliance and reporting. We deliver a range of ESG services as integral parts of wider strategic programmes or as standalone projects. Our purpose is to support our clients to be sustainable and successful by linking ESG strategy and actions to commercial performance and value creation.

This document sets out our actions and commitments to understanding and managing risks, ensuring we act responsibly, adhere to ethical standards, and maintain integrity in all business dealings.

### Our approach to sustainable business

We are committed to conducting business in a sustainable, ethical, and responsible manner. We believe that good corporate practice is essential to long-term success and must be reflected in our workplace and in the workplaces of our clients and partners. Our culture prioritises integrity and ethical behaviour, and we see this as a vital part of our reputation and relationship with our clients and partners.

SIFA is committed to operating in line with the Ten Principles of the UN Global Compact and contributing positively to the UN Sustainable Development Goals (SDGs).

### **Modern Slavery**

We ensure that our business operations and services respect internationally recognised human rights and acknowledge our responsibilities under the UK's Modern Slavery Act 2015. We do not tolerate modern slavery in any form, including slave labour, servitude, forced labour and human trafficking, in our own operations or in those of our clients, partners, suppliers and their supply chains. We will not knowingly support or have dealings with any business involved in modern slavery. Our actions include careful selection of new suppliers, and periodical reviews, as appropriate, of existing suppliers to mitigate risks of modern slavery in our value chain.

### **Supply Chain and Procurement**

Our suppliers fall into two main categories: 1) operational suppliers (suppliers of IT, travel and facilities services) and 2) Service delivery partners (consulting, technology, design and print providers that assist in delivering services to our clients). We select and assess our suppliers based on their respect for human rights; adherence to relevant laws and regulations; as well as their commitment to responsible business practices including environmental sustainability and social impact. We aim to only work with suppliers that align with our ethical standards.

## **Diversity, Equity, and Inclusion**

We are committed to creating an inclusive environment that respects diversity and supports personal growth and career progression. All contributions from staff are valued and recognised. Our key commitments include ensuring equality, fairness, and respect for all employees, regardless of age, gender, disability, marital status, race, national origin, religion, sexual orientation or other protected characteristics. We are focused on hiring, promoting and compensating based on merit, and we oppose all forms of unlawful discrimination in adherence with the Equality Act 2010. We also expect our partners, clients and suppliers to adhere to high standards and policies to protect and encourage diversity, equity and inclusion.



#### **Environment**

We prioritise responsible environmental practices and work to minimise negative impacts and ensure compliance with relevant environmental laws and standards. We are committed to ensuring that our operations are managed in an environmentally friendly and sustainable way and take necessary measures to prevent pollution, to conserve natural resources required for our operations. We also work closely with our partners and clients to reduce their environmental impact and to encourage responsible business practice.

# **Anti-Bribery and Corruption**

SIFA does not tolerate any form of bribery or corruption. Employees and others acting on behalf of SIFA are strictly prohibited from engaging in bribery or unauthorised payments. In all our dealings, we are committed to enforcing and complying with all applicable anti-corruption laws, including the UK Bribery Act 2010 and applicable anti-corruption regulations in the other regions in which we operate. Any violation is grounds for disciplinary action, and breaches of antibribery laws may lead to criminal convictions and/or fines.

#### **Tax Evasion**

We take a zero-tolerance approach to tax evasion and its facilitation and comply with all applicable tax laws. We do not engage in practices which divert taxes from relevant authorities or engage in business practices or transactions where tax evasion is present or is suspected to be present. SIFA will report any requests or demands that may constitute tax evasion promptly.

### Whistleblowing

Our Whistleblowing Policy provides a process by which people are able to raise concerns that they may have about the conduct of others in the business or the way in which the business is run, without fear of retaliation. Our partners and clients are also expected to have regard for the importance of preventing and eliminating wrongdoing in their businesses and should have a communicated process for employees to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.

#### **Data Protection**

We recognise the responsibility of managing sensitive data and work continuously to minimise cybersecurity risks and to ensure that the data we hold is held securely. SIFA is committed to protecting the integrity of data and systems, and to maintaining the privacy of all individuals and organisations with whom we interact during the course of our business. SIFA adheres to the UK's Data Protection Act 2018 and the relevant international legislation. Further detail is set out in our Privacy Policy which is available on our website.

We review this policy annually to ensure it reflects current standards and best practices. Please contact any member of our team should you have any questions or suggestions.

Signed by:

Fergus Wylie

Co-founder & Director

SIFA Strategy

Signed by:

Ben Morton

Co-founder & Director

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