



ESG[✓]

Environmental, Social & Governance.

Environmental, Social and Governance Policy
The **Seetru** Organisation



Environmental:

Focuses on sustainability, protecting the environment and reducing the company's impact on climate change. Some examples of environmental goals include reducing greenhouse gas emissions, conserving water, and using sustainable materials.

Social:

Focuses on creating a positive impact on society and the company's employees. Some examples of social goals include promoting diversity and inclusion, providing fair wages, and giving back to the community.

Governance:

Focuses on ensuring that the company is well-managed and accountable to its stakeholders. Some examples of governance goals include having a strong board of directors, implementing ethical business practices, and disclosing financial information transparently.



About our

Environmental, Social and Governance Policy

This document lays out our Environmental, Social and Governance policy. This reflects our identity and our values. Our whole organisation lives and works to these policy elements.

We require our business partners (suppliers and distributors) also to comply with our policy, and they confirm this by signing up to our Code of Conduct in which all the elements of our ESG policy are embedded.

Andrew Varga

Managing Director

BMD 001

Revision 10, Reviewed 28th July 2023

Environmental, Social and Governance Policy

The **Seetru** Organisation



1 Introduction

The Seetru Organisation consists of Seetru Ltd, Leser UK Ltd and Blupax Engineering, it also includes Seetru Engineering Services which is an operating division of Seetru Ltd. This policy applies to the whole of the Seetru Organisation.

2.1 Our Purpose

Our Purpose is the way we want to be thought of by our customers and our employees, namely, as the providers of:-

“Safety valve and Liquid Level Gauge solutions that can be trusted and which are supported by an organisation that cares.”

By this we mean that our objective is that our customers can have complete trust and confidence in the full lifecycle provision of our products and services, from our product design, through the quality of our raw materials, manufacturing and assembly processes, to the technical support and solutions we provide; as well as the respect with which we implement our Environmental, Social and Governance responsibilities.

2 About Seetru and Our Stakeholders

Seetru was founded in 1949. Our existence and growth has been due to our continual innovation of products and services, and the capabilities, loyalty and dedication of those who work in our organisation.

Since our early days we have done things differently and this makes us unique in many ways. In order to ensure our long term sustainability we will continue to invest in our business, and to do things differently. We aim to develop through a shared vision of how we work and where we are heading:

“Continually improving and innovating for the profit and well-being of our organisation, our employees, our customers, our community and our environment.”

We aim to create value through understanding and delivering on our customers’ needs. We aim:

“To go above and beyond our customers’ expectations and so to be our customers’ supplier of choice.”

and

“To work in partnership with our suppliers and distributors to achieve a high quality and highly competitive service to our customers worldwide”.

Seetru believe that sustainability starts with our value system and principled approach to doing business. Doing the right thing is for us both a matter of principle and good business sense; we must be efficient, we must prevent all forms of harm to people involved in our business, and we must minimise our impact in the environment.

Seetru incorporates the Ten Principles of the UN Global Compact into our strategies, policies and procedures so as to establish a culture of integrity and responsibility.

Environmental, Social and Governance Policy

The **Seetru** Organisation



2.2 Our Core Values

2.2.1 Sustainability

We all work hard to create business sustainability long term, and this will ensure sustainability of employment for everyone.

We are committed to ensuring the environmental sustainability of our business.

2.2.2 Ethical COMPANY

We are all committed to making Seetru a strongly ethical business.

A culture of honesty, integrity, respect, professionalism and empathy are expected from everyone.

2.2.3 Excellence

We design and make high quality products and always deliver them when the customer wants them.

We are all committed to excellent customer service and satisfaction.

2.2.4 Together

We all work hard to create business sustainability long term, and this will ensure sustainability of employment for everyone.

We are committed to ensuring the environmental sustainability of our business.

2.2.5 Results

We all understand our performance objectives and what results are expected.

We are all committed to delivering strong performance at business, team and individual level.

2.2.6 Understanding

We understand the needs of customers, suppliers and our colleagues and strive to satisfy them as far as we possibility can.

We understand our health and safety responsibilities and are committed to a safe and healthy working environment.

The Seetru Care Triangle



We all care about our Customers and our environment

Environmental, Social and Governance Policy

The **Seetru** Organisation



2.4 Our Vision

To use our unique Seetru culture to build a truly global presence.

2.5 Our Mission

Continually improving and innovating to achieve year-on-year sustainable turnover with profit and growth, thereby supporting the sustained well-being of our company, our employees, our customers, our community and the environment.

To provide high quality, innovative and value for money safety valve and liquid level gauge related products and services that meet customer needs

3 Our Environmental, Social and Governance Responsibilities

The objective of our Environmental, Social and Governance (ESG) Policy is to support the long term Sustainability of our operations and our Organization. Our ESG policy addresses a range of issues which are of great importance to us in the way we work, these include:-

1. Standards of Behaviour and the rule of law
2. Our employees
3. Health and Safety
4. Environmental protection
5. The sustainability of our business and the planet

We look to work in partnership with our supplies to achieve our objectives and require our supply chain partners to adhere to these same core principles and values.

3.1 Standards of Behaviour and the rule of law

3.1.1 Ethics

Honesty, integrity, openness, professionalism and respect for people and our environment underpin everything we do and are the foundations of our Organization's business principles.

It is the requirement of the Directors that all our Organization's operations are conducted to the highest ethical and moral standards and that everyone working within and on behalf of our Organization behaves with the highest ethical standards.

We must always pursue our business objectives with integrity and in complete compliance with both the letter and the spirit of all laws; there are no exceptions.

It is the responsibility of all in our Organization to apply and foster these values and standards.

Environmental, Social and Governance Policy

The **Seetru** Organisation



3.1.2 Legal, regulatory and policy compliance

3.1.2.1 Human Rights

Seetru, our suppliers, and all entities and individuals within our supply chain, must comply with the following:-

- Elimination of child labour: all employees shall have reached the minimum age required for work in the relevant jurisdiction.
- Elimination of discrimination: of any kind in respect to hiring, employment and occupation practices.
- Elimination of all forms of personal harassment.
- Compliance with applicable laws and regulations relating to:
 - working hours, days of rest and safe working conditions; and
 - employee rights and wage levels.

3.1.2.2 Modern Slavery Act 2015

Seetru, our suppliers, and all entities and individuals within our supply chain, must comply with the UK's Modern Slavery Act 2015. Specifically, with respect to our own labour practices and those within our supply chain:

- all forms of illegal, forced or compulsory labour, slavery and servitude are prohibited;
- no individual shall be induced through force, threats, or deception to provide services or benefits of any kind to another or to enable another to acquire, in such a manner, benefits of any kind;
- no individuals, groups or organisations shall be involved in the Trafficking of humans. Trafficking means:
- Recruiting, transporting, transferring, harbouring, receiving, transferring or exchanging control, or otherwise arranging or facilitating travel of any individual who is travelling while at risk of being exploited through any type of forced or compulsory labour or slavery or servitude.

3.1.2.3 Bribery Act 2010

Bribery is a criminal offence. Our Organisation prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and all applicable international anti-bribery / anti-corruption laws. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by management, employees or by third parties acting for or on behalf of ourselves or our suppliers.

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe, i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Organisation, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

Environmental, Social and Governance Policy

The **Seetru** Organisation



3.1.2.4 Conflict Minerals, US Dodd-Frank Act and Supply Chain Due Diligence

Seetru wish to have supply chain transparency and to facilitate responsible mineral sourcing so as to ensure that our use of minerals in our products does not directly or indirectly finance or benefit armed groups who perpetrate human rights abuses. The minerals subject to these provisions include:-

- Tin
- Tantalum
- Tungsten
- Cobalt
- Columbite-Tantalite (coltan)(source of Tantalum)
- Cassiterite (source of Tin)
- Wolframite (source of Tungsten)
- Derivative metals of the above minerals

Should any of the above minerals be required in our products or production it is our policy that, where these minerals might originate from, or were processed in, any of the following countries:-

- Democratic Republic of Congo
- Angola
- Burundi
- Rwanda
- Central African Republic
- Republic of Congo
- South Sudan
- Tanzania
- Uganda
- Zambia

Our supplier must use their best endeavours to trace the original source of supply and confirm that the supply is not supporting armed groups who perpetrate human rights abuses.

3.1.2.5 Due Diligence

We must undertake Due Diligence in all aspects of the execution of our business in order to ensure that we discharge all our responsibilities: our legal and regulatory responsibilities as well as our moral and commercial responsibilities.

3.2 Our Employees

Our people are our most precious resource: it is the attitude, enthusiasm, commitment, capability, flexibility, team working and involvement of each and every one that is the key to the success of our Organisation. We believe that a caring, inclusive and diverse environment with equality of opportunity enhances innovation and enthuses the people who drive our company. We want our people to thrive. We require our managers to instil this into all aspects of our operations.

To achieve success for our Organization the work is bound to be challenging, but we aim to make it enjoyable as well. We endeavour to provide excellent conditions of employment and benefits, and to enable our people to participate in the success of our Organization through remuneration and personal development.

Environmental, Social and Governance Policy

The **Seetru** Organisation



Training is important to enhance the capability and competencies of our people, and to offer them the opportunity for personal development.

We aim to:

- maintain Investors-in-People accreditation and excellent management of our people and their competencies;
- insist upon involvement, ownership and responsibility for all tasks;
- work together in our Organisation as a team;
- understand that enthusiasm, commitment, flexibility, communication and co-operation are vital throughout the Organisation, and that each and every person in our Organisation has a vital role to play in achieving success.

3.3 Our Health and Safety Policy

We in the Seetru Organisation recognise our duties under the Health and Safety at Work etc. Act 1974 and the accompanying protective legislation. We will endeavour to meet the requirements of this legislation so as to ensure that we maintain a safe and healthy working environment. Our managers and supervisory staff are informed of their responsibilities to ensure they take all reasonable precautions, to ensure the safety, health and welfare of those that are likely to be affected by our undertaking. Responsibilities and arrangements for all health and safety activities are through normal line management in accordance with the organisational chart within the quality manual, reference number ES40121.

The Seetru Organisation recognises so far as is reasonably practicable the duty to ensure the following:

- To provide and maintain a safe place of work, safe systems of work, safe equipment and a healthy and safe working environment.
- To ensure that hazards are identified and regular assessment of risks are undertaken.
- To provide information, instruction, training and supervision as is necessary to ensure employees and others are assured of a safe and healthy working environment.
- To promote the awareness of health and safety and encourage health and safety best practice throughout our organisation.
- To ensure we are taking the appropriate protective and preventative measures.
- To ensure that we have access to competent advice and are able to secure compliance with our statutory duties.

In order that we can achieve our objectives, and ensure our employees recognise their duties under health and safety legislation whilst at work, we must ensure that we inform them of their duty to take reasonable care of themselves and others that may be affected by their activities. We ensure our employees are always and fully informed of their obligations to ensure they co-operate with management and adhere with The Seetru Organisation safety rules which are provided within the **Employee Safety Handbook**.

Environmental, Social and Governance Policy

The **Seetru** Organisation



3.4 Our Environmental Policy

The Seetru Organisation are committed to conducting our business responsibly so that we protect our employees, the public and the environment. Our Safety, Health and Environmental commitments are core values of the Organisation and integral parts of our business activities.

We will meet or exceed all applicable Environmental Laws and Regulations in our business activities; in addition we will apply a precautionary approach to environmental risks.

We will look to minimise our carbon footprint.

We will continually work to achieve the following Environmental Objectives:-

- Look to use zero emission energy and offset our carbon emissions where we cannot practically prevent our production of such emissions.
- Conserve energy, water and resources, minimising use of natural resources and impact on the environment.
- Reuse and recycle where possible and economic, changing to renewable resources where practicable.
- Adopt good practice with regard to the reduction of waste, minimising the need for treatment, disposal or emissions.
- Use raw materials and dispose of waste in a safe environmentally acceptable manner.

In order to make our behaviour consistent with this Policy Seetru will:

- Provide employees with appropriate training necessary to acquire the skills and techniques needed.
- Encourage and expect our employees to participate in the development and implementation of our Environmental Programme.
- Ensure that all applicable waste is disposed of in a manner compliant with applicable Law and Regulations.
- Operate a process of continual improvement to our Environmental Programme and Performance through periodic audit, evaluation, review, and implementation of appropriate corrective and preventive actions.
- Aim to achieve ISO14001 accreditation.

This Policy will be reviewed annually by the Directors and amended where necessary in order to remain current. The Organisation is committed to this Environmental Policy and will provide sufficient financial and physical resources to meet the objectives.

Environmental, Social and Governance Policy

The **Seetru** Organisation



3.5 Our Sustainability Procurement Policy

3.5.1 Introduction

It is widely accepted that the way we live now is having a detrimental effect on the quality of our lives and the environment in which we live. We need to look seriously at the way we use the earth's resources and operate our business. Our Organisation's sustainability approach recognises the broader impacts of our actions and aims to minimise any adverse effects. Our Policy on Procurement for Sustainability is thus about meeting our business's needs today without adversely affected the ability of others in the future to meet their needs: i.e., it is about the deliberate inclusion of public interest into our corporate decision making and honouring of the triple bottom line: People, Planet and Profit.

3.5.2 Policy Aims

The aim of our policy is to balance three main factors: economic, ethical (social) and environmental considerations. We aim to promote good procurement practices and the development of ethical supply chains. We aim to meet our needs for products, services, works and utilities in ways that achieve value for money on a life-cycle basis in terms of generating benefits not only for ourselves but also to society, whilst minimising damage and preferably improving the environment.

3.5.3 Policy

Our sustainability procurement policy has four key elements in addition to operating fully in accordance with this ESG policy:

- Reduce need, find alternatives and avoid purchases where possible;
- Work with suppliers who operate in an ethical and environmentally sound way, in particular concerning carbon footprint;
- Work to ensure we purchase products and services that have minimal environmental, social and economic impacts;
- Take into account the whole life cost of the product or service – from acquisition, through operation, to disposal.

Environmental, Social and Governance Policy

The **Seetru** Organisation



4 Compliance, Monitoring and Reporting

Compliance with this policy shall be continuously monitored and reviewed by the Directors annually. Where appropriate each element of this policy is implemented within the Organisation through further and more detailed implementation policies, procedures and processes. Each manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all of our employees and for ensuring compliance in their area of responsibility.

Carbon Reduction Plan

Seetru Limited are committed to achieving Net Zero Carbon as close as possible to 2030, and before 2050.

For more information, please visit:

www.seetru.com/company-information/carbon-reduction-plan



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