



Connexin ESG Policy

Document Reference: CXNPOL 004

Version Number: 3.5

Date Created: July 2022



1 INTRODUCTION

Connexin provides and manages digital infrastructure, connectivity, and smart IoT solutions across the UK.

The business specialises in the delivery and operation of IoT networks, digital services, and data-driven solutions that support public sector, utility, and enterprise customers. Connexin remains committed to conducting its business and operations in accordance with the highest legal, ethical, and professional standards.

This Environmental Social and Governance Policy (ESG Policy) (the Policy) sets out the aims and commitments related to Environmental, Social and Corporate Governance (ESG) issues of Connexin. The Policy applies to the Board of Directors (the Board), the Management Team, main service providers and staff at Connexin.

The Board is responsible for updating and approving this document. The Management Team is responsible for its proper implementation and reporting to the Board.

This policy was prepared by Connexin and approved by the Board.

2 ENVIRONMENTAL RESPONSIBILITY

2.1 ISO 14001 Standard

Connexin is accredited to ISO 14001 and will continue to maintain this whilst also adhering to other applicable standards.

2.2 Biodiversity & Habitat

Connexin's aim is for its activities to have minimal impact on the surrounding biodiversity. Where possible it will improve biodiversity and will actively mitigate and monitor impacts of its construction activities, whether positive or negative. Where necessary and possible Connexin will investigate and complete adaptation and mitigation measures to support these aims.

2.3 Climate Change Adaptation and Resilience

Connexin's aim is to understand the future risk and opportunities of climate change on its business and the community within which it operates and where practicable will conduct and integrate climate risk studies into its operational decisions. Where necessary and possible, Connexin will investigate and complete



adaptation and mitigation measures for climate change. Connexin will engage with its customers and suppliers to consider the role it can play in the resilience of the urban environment to catastrophe or natural disasters.

2.4 Energy and Greenhouse Gas Emissions

The nature of Connexin's activity positions it on the low end of the environmental impact spectrum, including some positive environmental impacts of its IOT solutions. During the operation of Connexin's network assets, focus will be placed on the efficient use of power and clean sourcing of electricity to data centres and street apparatus and to the active side of the network to try to ensure our greenhouse gas emissions are minimised.

Connexin has the ambition of reaching net zero carbon by 2040, or to align with the emission targets of those jurisdictions to which it is subject.

2.5 Pollution and Environmental Impact

During construction, Connexin's environmental focus will be on avoiding hazards linked to breaking of unidentified underground existent utilities. In avoiding these hazards, we aim to reduce our possible intrusion into or cause contaminated land and release of hazardous substances. Connexin will also follow best industry practice for disposal of waste produced during construction. Connexin will strive to minimise air, noise and light pollution during development and operation of the asset.

2.6 Water

Connexin aims to ensure sustainable use of water resources by its operators.

2.7 Waste

Connexin aims to support its operators and suppliers in reducing waste generation and diversion of materials to landfill. Where applicable, Connexin itself will reduce its waste generation and work with its suppliers to improve recycling and reuse efforts.

2.8 Pollution

Connexin intends to minimize air, light and noise pollution where necessary and possible. It will engage with its operators to further support this aim.

2.9 Sustainable Supply Chain

Connexin will ensure a sustainable supply chain, selecting materials based on their environmental impact and increasing resource efficiency. Where possible, this will focus on using locally sourced materials, reducing transportation



requirements for material delivery and considering the embodied carbon of the development.

2.10 IOT Business Division

Connexin's IOT business division is focussing on using smart technology to support the digitisation of city council services and working closely with enterprise customers and utility suppliers to better manage their assets and infrastructure. We design, build, and implement solutions such as smart parking, smart waste management, smart air quality sensing, leakage detection and many others to help improve efficiencies and reduce environmental impacts. This in turns improve the quality of life and wellbeing for the general public.

3 SOCIAL RESPONSIBILITY

3.1 Labour Standards

The Board, the Management Team and main service providers will ensure that all employment engagements are subject to the employment laws and practices of England.

Connexin does not condone or tolerate the use of child labour and modern slavery and will pass this through to its engagement with its suppliers. Connexin will implement such checks through its due diligence and procurement processes.

3.2 Employee Engagement

Connexin launched a mental health wellbeing programme during the Covid – 19 pandemic and will now extend this into the wellbeing hub which will be a resource for all employees to seek advice and help resources for their physical and mental wellbeing. We undertake annual employee satisfaction survey with an external provider and monitor the outcome of this. Other regular activities include the monthly "team lunch" which acts as a platform for conveying company news and also for a fun activity for which awards are given and charity events in which all can participate like the Macmillan great Trek.

3.3 Equality and Diversity

Connexin wholeheartedly believes in the value and importance of equality and diversity and strive for broad diversity across directors, management and staff. Connexin actively monitors diversity statistics across its workforce and will look to partner with organisations to improve diversity in the digital sector.



4 STAKEHOLDER ENGAGEMENT, HEALTH & SAFETY, AND COMMUNITY IMPACT

4.1 Health and Safety ISO 45001

Connexin is accredited to ISO 45001 for Health and Safety and is committed to maintaining this or the equivalent standard. Connexin has an appointed internal Head of SHEQ & Compliance who is accountable for ensuring that the standards are understood, adhered to and reported on.

Connexin has an objective of zero accidents and has put in place a series of Health and Safety measures and training which are monitored and discussed periodically in Board meetings to identify improvement areas and prevent incidents. This extends across employees, contractors, supply chain and, where applicable, the community. We have engaged the services of a third-party training and recording platform to ensure compliance with all relevant legislation.

In addition to this, Connexin engages a number of specialist contractors to support the deployment, installation, and maintenance of its IoT networks and digital infrastructure services. Each contractor is responsible for managing health and safety within the scope of their operational activities, with oversight provided by Connexin project and operational management teams. Any deviations, incidents, or potential risks are escalated through the appropriate governance and reporting processes.

Contractors are required to undertake regular health and safety briefings, toolbox talks, and site risk assessments to identify, avoid, and mitigate potential hazards associated with deployment and maintenance activities. Connexin also requires all contractors to maintain appropriate emergency response and communication procedures to ensure incidents are managed effectively and safely.

Connexin has partnered with Atlas Citation to provide advice, update and audit services for Health and Safety matters, Citation also provides a platform for reporting, monitoring and training materials.

We routinely identify and manage risks relating to ESG issues to ensure the long-term sustainability of our business.

4.2 Ethical Conduct

We will conduct our business with integrity and transparency whilst adhering to the highest ethical standards.



4.3 Stakeholder Engagement

Connexin is committed to building and maintaining strong, transparent relationships with all relevant stakeholders, including local communities, contractors, operators, customers, investors, and employees. We actively engage with these groups on a regular basis to understand their perspectives, address concerns, and incorporate their feedback into our ESG strategy and business practices.

To support this approach, we have developed a comprehensive Stakeholder Management Plan that outlines how we identify, prioritise, and engage with stakeholders in a consistent and meaningful way. We also seek to measure and improve customer satisfaction through structured feedback mechanisms, including an annual customer satisfaction survey.

For our residential customers, we closely monitor Trustpilot reviews and feedback on a weekly basis. This allows us to respond promptly to concerns, address any dissatisfaction, and continuously improve the customer experience.

Through ongoing engagement and feedback, Connexin aims to ensure that stakeholder views are embedded in decision-making and that our operations deliver long-term value for both our stakeholders and the wider community.

4.4 Local Community Support

Connexin aims to promote development within the local community by supporting technological advancement, digital inclusion, skills development, and employment opportunities across the region. The business is committed to recruiting local people from diverse backgrounds and creating long-term opportunities within the communities in which it operates.

Connexin continues to work with local social enterprises, schools, colleges, and universities to promote entrepreneurship, innovation, and digital skills. One such initiative is the Connexin £10 Challenge, where Connexin provides £10 to school classes in return for business plans, with pupils competing to generate the greatest profit from selling a product or service. Proceeds are reinvested into the school trust to support less advantaged pupils who may require additional financial support. Connexin remains committed to expanding engagement with educational institutions and supporting future talent development.

Connexin also supports a range of local sports teams, sporting organisations, and athletes, from grassroots community teams through to nationally recognised organisations such as Hull KR. Through these partnerships, Connexin promotes healthy living, wellbeing, and stronger community engagement.



Connexin Academy is an established training and skills development provider focused on equipping learners with leadership, management, procurement, and digital skills for the future economy. Supported by industry expertise and practical learning environments, the Academy works with employers, apprentices, and local communities to develop long-term career opportunities and workforce capability.

Connexin also operates “Connexin Cares”, a community initiative supporting local charities, community groups, and wider social value activities across the regions in which the business operates.

5 GOVERNANCE

5.1 Governance Processes

The Connexin Board has an active role in Connexin’s sustainability drive and supports continuous improvement of its ESG decision making. Connexin adheres to and subscribes to its shareholder responsible investment practices, including those set by its investors. Connexin believes in an open, transparent, and safe working environment and recognises and supports whistle-blower protection. Connexin will ensure that any engagement with lobbying groups is aligned with our climate change and other sustainability commitments as well as our shareholders’ corporate commitments.

5.2 Fraud

Connexin operates internal processes to eliminate fraudulent activity including a purchasing process which requires 2 points of approval for all purchases and the expenses policy and process which requires line manager approval and account approval for all employee incurred work related expenditure.

5.3 REMUNERATION COMMITTEE

The Connexin Board includes a remuneration committee which meets as required to approve compensation matters. Shareholder approval is required for a number of reserved matters including the approval of employee packages which exceed a certain threshold.

5.4 Fiduciary Duties

Connexin and all its Board members are compliant with the highest anti-corruption standards and do not condone or tolerate unethical behaviour at any organisational level. Connexin has a zero-tolerance approach to bribery. This



applies to all levels of the organisation, particularly when dealing with public officers, including contractors and sub-contractors. Connexin has a zero-tolerance approach to Money Laundering activity tax evasion and operates rigorous financial controls to support this policy.

5.5 Data Protection and Cybersecurity

Connexin ensures it meets statutory data protection and cybersecurity requirements. As a fibre optic network owner, Connexin understands the importance of upholding strong data protection and cybersecurity measures. It therefore integrates data protection and cybersecurity requirements throughout the asset lifecycle from due diligence through to operation.

Connexin is accredited to ISO 27001 for Information Security Management System, along with Cyber Essentials and is committed to maintaining this to support its ongoing data protection and cybersecurity statutory requirements.

5.6 Transparency

Connexin is committed to good corporate governance driven through transparency and supported by annual external audits. This would include approval of donations which are proposed to be made which might be construed as having a political beneficiary or aim.

Its Board directors agree to share any information which may result in a conflict of interest for Connexin, and all Board directors have presented to the Board a form in which they notify all other positions held in other corporations.

5.7 Sustainability Governance

Connexin control systems include approvals involving the Management Team, main service providers and staff as well as a monthly control on financials. During construction phases, Connexin will have an external Project Manager in place which has day to day control over construction cost and progress.

ESG is integrated throughout Connexin's activities, with the board having oversight and final decision making upon ESG policy. The role of ensuring Connexin abides by this policy is delegated to the Management team and contractors and sub-contractors involved in Connexin projects.

6 IMPLEMENTATION & MONITORING

We will implement this ESG policy, through clear objectives, regular monitoring and continuous improvement.