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Introduction

Bytes Software Services (Bytes/Company) acknowledges the environmental and social impacts of its operations and is committed to conducting its business responsibly, ethically, and sustainably. We comply with all applicable legal and regulatory requirements and align our approach with recognised ESG principles and best practices, driving continual improvement across our business.

Purpose

The purpose of this policy is to establish the Company's framework for managing its corporate social responsibility commitments and to set out the principles, objectives, and responsibilities that support positive environmental, social, and economic outcomes.

Key Objectives

- Promote equality, diversity, and inclusion by fostering a workplace culture that reflects the diverse communities we serve and provides equal opportunities for all to contribute, develop, and thrive.
- Increase female representation across all levels of the organisation, particularly in technical, specialist, and leadership roles.
- Maintain pay equity by ensuring equal pay for all employees regardless of gender, race, or other protected characteristics.
- Provide and maintain a safe, healthy, and supportive working environment that promotes the wellbeing of employees and safeguards contractors and visitors.
- Increase employee participation in volunteering activities across the business by providing opportunities to support local communities.
- Achieve net-zero emissions by FY2041 through the reduction of operational emissions and the adoption of sustainable practices.
- Achieve zero waste to landfill by 2027/28 through increased waste reduction, reuse, and recycling initiatives across the business.
- Partner with responsible suppliers who demonstrate ethical business practices, social responsibility, and strong environmental performance.

Scope

This Policy applies to all employees of Bytes Software Services and is communicated through Compass. It also extends to suppliers and subcontractors and is made publicly available on the Company website.

The Policy underpins the Company’s Systems Manual, ISO certifications, KPIs, SBTi-aligned targets, EcoVadis rating, and overall approach to stakeholder engagement.

Policy

The Company conducts its business in accordance with high standards of ethics, professionalism, and regulatory compliance. Its values of honesty, integrity, and transparency are embedded throughout

the organisation and supported by the expertise of the Compliance team, ensuring that it meets its legal and ethical obligations while delivering high-quality services to customers.

The Company is guided by the principles of the Universal Declaration of Human Rights and aligns its activities with seven of the United Nations Sustainable Development Goals (SDGs): No Poverty, Zero Hunger, Good Health and Wellbeing, Quality Education, Gender Equality, Decent Work and Economic Growth, and Climate Action, which serve as a framework for this policy.

Environment

The Company is committed to minimising its environmental impact and seeks to achieve this through its ISO 14001-certified environmental management system and a range of initiatives, including:

- Measuring, reporting, and actively reducing carbon emissions in line with our commitment to achieving Net Zero by 2040/41, as validated by the Science Based Targets initiative (SBTi);
- Using renewable energy sources, investing in energy efficiency across our offices, and monitoring energy usage against internal targets;
- Implementing an electric vehicle (EV) scheme and providing EV charging infrastructure to promote low-carbon travel;
- Setting and reporting targets to divert waste from landfill, driving continuous year-on-year improvement and reducing single-use plastics;
- Establishing and reporting water usage targets to drive reductions;
- Ensuring employees understand the environmental impacts of our operations and their role in minimising them; and
- Reporting environmental data annually through CDP at Group level, alongside participation in external sustainability assessments such as EcoVadis.

Employees

In addition, Bytes is committed to maintaining an inclusive, supportive and high-performing working environment through the following principles:

- Fostering a diverse and inclusive workplace at all levels of the organisation, reflecting our core values;
- Ensuring a workplace free from all forms of harassment and discrimination, including on the grounds of race, gender, political belief, or religion;
- Ensuring all employees are treated with fairness, respect, and dignity by both management and colleagues;
- Empowering employees through targeted training and development, enabling them to excel and advance their careers;
- Promoting open, two-way communication and encouraging employees to contribute ideas that support continuous improvement; and
- Providing fair and equitable pay, ensuring all employees receive at least the National Living Wage and appropriate benefits, and publishing annual gender pay gap reports.

Community

Bytes plays an active role in supporting the socio-economic development of the communities in which it operates and works in partnership with them through a range of initiatives, including:

- Engaging with local schools;
- Promoting local employment through work experience opportunities, helping individuals to develop relevant skills;
- Encouraging employees to use paid volunteering days to support charitable organisations and causes, including The Rainbow Trust, Greyhound Welfare, and the Wildlife Aid Foundation;
- Offering matched funding to support employees' charitable activities; and
- Donating funds and goods, including laptops, to causes such as homelessness charities and educational institutions.

Supply Chain

Suppliers are expected to uphold our commitment to corporate responsibility and demonstrate continuous development and improvement. This includes:

- Complying with applicable laws and internationally recognised standards, including the principles of the United Nations Sustainable Development Goals (UN SDGs), and implementing measures to prohibit all forms of modern slavery;
- Adopting responsible sourcing practices that promote ethical business conduct throughout their operations and supply chains;
- Working to reduce their environmental impact, including minimising carbon emissions and resource use; and
- Adhering to our Supplier Code of Conduct, which sets out detailed expectations in relation to environmental, social, and ethical standards.

Lines of Responsibility

EXCO	Provides clear direction and accountability across the Company, fostering a culture of responsibility, ethical conduct, and sustainable business practices.
Group Sustainability Manager	Provides strategic oversight of environmental and social sustainability across the Group, chairs the Sustainability SteerCo and drives Group-wide initiatives and stakeholder engagement. Leads the development, implementation, and monitoring of carbon reduction targets and oversees key sustainability reporting and disclosures.
HR	Coordinates apprenticeship and work experience programmes, ensuring opportunities are regularly reviewed, enhanced, and aligned with business needs. Supports the development and implementation of people-focused initiatives, including training, employee engagement,

	and talent development, while promoting a culture of inclusion, wellbeing, and continuous improvement.
Facilities	Provides oversight of energy efficiency, water and resource consumption, waste management, and environmental compliance across all sites, identifying opportunities to improve environmental performance.
Compliance	Ensures compliance with applicable legal and regulatory requirements and supports ethical, responsible, and sustainable business practices through effective governance, monitoring, and reporting.
Employees	Treat one another with respect and act responsibly in support of the Company's CSR commitments, actively participating in environmental and social initiatives and striving to minimise their impact on the environment.

Supporting Documentation

- POL040 - Equality Diversity and Inclusion Policy.pdf
- POL044 - Health & Safety Policy.pdf
- POL042 - Environmental Policy.pdf
- POL039 - Speak Up Policy.pdf
- POL043 - Fraud, Bribery & Money Laundering Policy.pdf
- POL045 - Modern Slavery Policy.pdf
- POL058 - Supplier Code of Conduct.pdf