

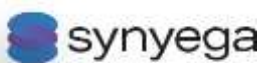


# Synyega Sustainability Policy Document

## 2022

## Document History

Version	Date	Comments
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Newton House,  
Birchwood Business Park,  
Warrington

Phone: 0800 464 365  
Email: [enquiries@synyega.com](mailto:enquiries@synyega.com)  
Web: [www.synyega.com](http://www.synyega.com)

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## 1. Introduction

### 1.1 Background

Synyega takes a considered and structured approach to managing its sustainability strategy and environmental impacts. We have a strong commitment to the prevention of pollution, adhering to all environmental legislation and to engendering continuous improvement, to achieve progress in overall performance.

As an organisation we want to level the playing field in a software market that undermines the buyer and favours the software vendor.

But our ethics and values don't end there, they are in everything we do.

We have made a commitment to ensure that as Synyega continues to grow that we operate as sustainably as possible. Not just for our benefit but also to try and ensure we are making positive contributions to the community and the environment.

We want to embed this thinking into everything we do as a business and because Synyega has grown organically without debt or venture capital investment we are free to act on our values.

### 1.2 Purpose and Scope

The purpose of this policy is to define our business's intentions with regards to improving our sustainability strategy and environmental performance. These include:

- Good health & wellbeing: we provide healthy workplaces, encourage healthy lifestyles and raise awareness of mental health & wellbeing.
- Quality education: we create opportunities for growth and development to our people and within the communities we operate in.
- Gender equality: we promote gender equality and create a diverse and inclusive environment for all.
- Affordable & clean energy: we aim to maximise energy efficiency, minimise carbon emissions and achieve Net Zero by 2030.
- Decent work and economic growth: we are committed to operating responsibly and offering fair, safe and a diverse workplace.
- Sustainable communities: we work with our communities to create sustainable places and are committed to supporting communities and local initiatives.
- Responsible consumption and production: we seek to reduce our environmental impacts through active operational management and responsible procurement.
- Climate action: we aim to achieve Net Zero carbon for our workplaces by 2030.
- Life on land: we expect our suppliers to operate responsibly and seek to protect biodiversity and ecosystems.

### 1.3 Document overview

This document includes the following policy information:

- Sustainability Policy
- Modern Slavery and Human Trafficking Policy
- Equal Opportunities Policy
- Environmental Protection and Enhancement Policy

## 2. Sustainability Policy

Effective management of safety, health, environment, quality, energy, carbon reduction, and responsible sourcing is of key importance to the sustained success of our business. We have a single sustainability policy, which is regularly reviewed and communicated to employees, contractors, visitors, key stakeholders, and our supply chain to inform and promote wider adoption of responsible practices.

As a minimum, we comply with all applicable legal and regulatory requirements. Co-operation in the effective implementation of the policy is a condition of employment, partnership and supply.

### 2.1 Business and product innovation

We will ensure continuous business and product innovation. We:

- Engage with our stakeholders to encourage innovative development of our services and systems to continually improve our sustainability performance.
- Inform our customers about the functional, environmental and safety performance of our services.
- Adopt a systematic and integrated approach and are committed to achieving the highest standards.

### 2.2 Health, safety and wellbeing

We will ensure Synyega is a safe and healthy place to work. We:

- Are committed to eliminating risk in the workplace through monitoring performance and implementation of best practice.
- Develop and implement action plans to ensure the health, safety and mental wellbeing of our employees and have enhanced occupational health surveillance for their benefit.
- Are committed to the continual improvement of the suitability, adequacy and effectiveness our policy.

### 2.3 Environmental responsibility

We are committed to fulfilling our share of the responsibility to keep the global temperature rise below 2° Celsius and we will continue to reduce our impact on air, land and water. We:

- Have stringent targets to reduce emissions to air from all our services.
- Set science-based targets to reduce carbon emissions and energy consumption, reduce the use of fossil fuel through efficiency improvements and the use of alternative and renewable sources.
- Seek to apply the principles of environmental stewardship throughout our operations by managing our services to ensure a biodiversity net gain and safeguarding geodiversity where appropriate.
- Use water efficiently, recycle where possible and protect water quality.

### 2.4 Resource use and the circular economy

We will conserve natural resources. We:

- Use resources appropriately and sustainably and, where possible, substitute primary resources with alternative materials.
- Adopt the waste hierarchy of waste prevention, reuse of materials, recycling, co-processing and energy recovery to minimise waste disposal and maximise productivity.

### 2.5 Fairness, inclusion and respect

We will be a fair, respectful and inclusive company; encouraging a culture that values openness and transparency and recognises individual achievement. We:

- Strive for the fair treatment of all our employees and everyone in our supply chain.
- Value our workforce and, by recruitment, selection and development of employees, contractors and suppliers, ensure they are appropriately skilled and competent to carry out their roles.
- Are committed to the consultation and participation of workers and workers' representatives through formal mechanisms.

## 3. Modern Slavery and Human Trafficking Policy

Synyega Limited is committed to carrying out procurement activities in a socially, ethically and economically responsible manner and to entering into contacts with suppliers that share and adhere to our vision. To demonstrate this commitment, we adhere to the following code of practice.

The principles are as follows:

- Not to employ, support or condone any form of Modern Slavery or Human Trafficking and to comply with the Modern Slavery Act 2015
- Not to use forced, involuntary or underage labour
- People should be free to choose their employment and leave that employment without hold by financial deposit or personal items.
- Forced, bonded or involuntary prison labour shall not be used.
- Support the effective abolition of child labour.
- Comply with the national minimum age for employment, unless a lower local minimum age is permitted under International Labour Organisations (ILO) convention 138.
- Where any child is found to be engaged in or performing child labour, to provide support for that child to enable them to complete, as a minimum, their compulsory education (even if they shall cease to be involved in child labour), or an equivalent educational level, as provided for under the UN Covenant on Economic, Social and Cultural Rights. Such support by the provider should recognise and not prove detrimental to the conditions of the child or those that their work supports. To provide suitable working conditions and terms
- For people aged 25 and over and not in the first year of an apprenticeship, at least the National Living Wage must be paid in accordance to the rates detailed at <https://www.livingwage.gov.uk/> as updated from time to time
- For people under 25, at least the right rate of National Minimum Wage must be paid in accordance to the rates detailed at <https://www.gov.uk/national-minimum-wage/employers-and-the-minimum-wage> as updated from time to time.
- The above must be paid without discrimination to all people employed and all non-statutory deductions must be with the consent of the employee.
- Working hours must not be excessive. A safe and hygienic environment must be provided.
- Any hazardous working should only be carried out by people aged 18 years or over.
- Policies and processes must be in place for recording and eliminating occurrence/reoccurrence of health and safety related incidents.
- Allow people the freedom of association to join (but not be forced to join) or be represented by a trade union or similar organisation of their choice.
- Provide a workplace free from discrimination, harassment or victimisation.

Our suppliers must also comply with the principles of this statement and make all reasonable endeavours to ensure compliance throughout their supply chains.

We reserve the right to seek further evidence of supplier's approaches to ensuring that Modern Slavery in all its forms is not occurring within the provider's supply chain. In addition, should a supplier's turnover be £36M or above, the legal obligation to publish a Modern Slavery Statement annually arises. We reserve the right to request evidence of compliance with this.

## 4. Equal Opportunities Policy

Synyega Limited is committed to the achievement of equality, promotion of diversity and fulfilling our responsibilities under the Equality Act 2010. To achieve this, we undertake the following actions (and also require our suppliers) to:

- Comply with the Act in all employment practices and service delivery. This includes not discriminating unlawfully on the grounds of the following protected characteristics recognised within the Act:
  - age
  - disability
  - gender reassignment
  - marriage and civil partnership
  - pregnancy and maternity
  - race
  - religion or belief
  - sex
  - sexual orientation
- maintain an appropriate written equality and diversity policy in respect of the protected characteristics. Such policy to cover unlawful discrimination and prohibited conduct in recruitment, selection, training, promotion and discipline and dismissal. This policy to be communicated to all of our people, service partners, stakeholders and suppliers. All are to take all reasonable steps to ensure their observance of it.
- treat all people fairly, with respect and dignity, and not accept inequality as justifiable of any characteristics listed above, unless statutory conditions require otherwise.
- remunerate all of our people equally at the same employment grade, regardless of any characteristics listed above, unless statutory conditions require otherwise.

Further information on the Act can be found at:

<https://www.gov.uk/equality-act-2010-guidance>

- comply with the Act in dealings with suppliers and impose the obligations outlined in this policy on their suppliers.
- monitor and if requested, report in writing the composition of our people by protected characteristics.

## 5. Environmental Protection and Enhancement Policy

In accordance with our commitment to the protection and enhancement of the environment, Synyega Limited is a net carbon positive company.

We recognise and understand the importance of protecting the environment in which we operate. We are fully committed to minimising the impact that running our business has on the environment and we encourage our clients, suppliers and other stakeholders to do the same.

We are aware that our business activities have an impact of the environment, such as

- Emissions to the air, in particular
  - Travel to our office in Warrington
  - Travel to client sites
- Use of energy and water
- Generation of waste

To reduce the impact of activities are our commitments are to:

- Continuously improve our environmental performance.
- Reduce our consumption of resources and improve the efficient use of those resources.
- Measure and take action to maintain the net carbon negative footprint of our business activities.
- Manage waste generated from our business operations incorporating reduction, re-use and recycling in accordance with the principles of the waste hierarchy.
- Manage our business operations to prevent pollution.
- Ensure sustainable procurement principles are taken into account in the procurement of goods and services.
- Comply as a minimum with all relevant environmental legislation

To meet our commitments, we will:

- Provide executive oversight and review of environmental policies and performance and allocate resources for their effective direction and implementation.
- Monitor key objectives for managing our environmental performance, including our environmental policy, at least annually.
- Advocate the importance of environmental issues to our suppliers.
- Engage with stakeholders, including communicating internally and externally our environmental policy and performance on a regular basis.
- Communicate the importance of environmental issues to our people.
- Work together with our people, clients, service partners, suppliers, landlords and their agents to promote improved environmental performance.
- Promote appropriate consideration of sustainability and environmental issues in the services we provide to our clients.
- Review our environmental policy regularly.

Specifically, we will aim to:

- Minimise the use of natural resources, for example by reducing the temperature in the office; by turning off lights and other electrical equipment when not in use and overnight. Ensure lights/heating are turned off in empty rooms where possible.
- Minimise the generation of waste and implement/promote recycling.
- Promote home working, as far as this is practical in the context of operational requirements.
- Minimise pollution and where travel is necessary, promote greener transport options e.g. car sharing, the use of public transport, bike to work schemes etc. Review the environmental impact of any company vehicles.
- Purchase and promote the use of environmentally friendly office and cleaning products.



# Synyega Sustainability Policy Document

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- Use whiteboards as opposed to flipcharts and refillable/long life pens/markers.
- Use recycled paper and save electronic copies rather than hard copies of documents.
- Print on both sides of the paper and use scrap paper where practical.
- Use refillable ink cartridges in the printer and recycle ink cartridges.
- Use mugs and glasses as opposed to disposable cups and / or single use plastic.

To continuously improve we will:

- Consider the environmental impact of any business decisions made.
- Inform and encourage our people at all levels to act in an environmentally responsible manner and provide training where necessary.
- Encourage feedback from our people on improvements and feed these into the policy.
- Designate appropriate resources in order to implement, monitor and continuously improve the policy.
- Make this policy available to any interested external parties and to our people.
- Continually improve and monitor the environmental performance of the company and report these to interested parties.

We will comply with all relevant legislative, regulatory and other environmental requirements in order to act in a socially responsible manner and we will strive to continuously improve our environmental performance.

As a minimum, we require our suppliers to:

- comply with the Environmental Protection Act 1990, including compliance in their dealings with their suppliers and impose the requirements of this policy on their supply chain.
- maintain an appropriate written environmental policy. This policy to be communicated to a supplier's people and its suppliers, who should take all reasonable steps to ensure their observance of it.



Tony Crawley  
Director  
February '22