



CONSTELLATION
COLD LOGISTICS

ESG Policy



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Environmental, Social and Governance (ESG) Policy

Overview

The Board of Constellation Cold Logistics S.à.r.l. (the “**Group**” or “**Constellation**” or the “**Company**”) recognises that it is critical for us to operate in a responsible way with respect to environmental, social and governance (“**ESG**”) issues. This is not only because it is the right thing to do, and is an important factor for our stakeholders, but also because ESG issues have a material effect on our business’ performance.

Responsibility for ESG

All staff have a responsibility to ensure that our company is doing what we can to be an ESG leader. Overall direction and oversight of the Environmental, Social and Governance Policy is the responsibility of the CEO, who delegates certain to-day management responsibilities to the respective country Managing Directors. We have also appointed ESG champions in each region to be the local point of contact for ESG queries and issues.

ESG training

Annual ESG training is completed by those within the organisation who are responsible for and have oversight of ESG as part of their role. We monitor and track the number of FTE employees who have undergone training during the year and the total annual expenditure on training for its employees.

Policy applicability and review

This Policy applies to the group, Constellation Cold Logistics S.à r.l, and all its subsidiaries. This Policy will be reviewed annually.

Purpose of the Policy

The aim of this policy is to ensure that ESG issues are considered at all levels of our business activities, and in accordance with international and national codes and principles. Specifically, we aim to achieve this by:

Having a clear ESG strategy

- Ensuring that our vision and ESG objectives are relevant, understood and communicated and that our employees demonstrate alignment to them

Having adequate ESG oversight and governance

- Including key ESG metrics, collected through standardised reporting templates, and any critical ESG items within the agenda of all Monthly Business Review meetings¹, and ensuring appropriate escalation to board level as necessary
- Identifying individuals at group level and for each country who are responsible for ESG matters
- Embedding ESG within the organisation, as a core part of what we do

¹ Monthly meetings to review performance and discuss critical issues relating to each region. Meetings include Constellation group CEO and senior management, and region MD and senior management team



Managing ESG risks appropriately

- Identifying all material ESG risks in the business activities undertaken by us and ensuring that the risks are fully considered and managed in a responsible and ethical way
- Ensuring that key decisions are only taken after full consideration of all material ESG issues and risks

Monitoring ESG performance and striving for continuous improvement

- Setting targets for environmental, social and governance matters which will be reported, monitored, reviewed, and disclosed to employees and shareholders
- Aspiring to improve our environmental, social and governance performance as compared to benchmarks

Ensuring effective communication and engagement on ESG issues

- Providing appropriate information, instruction and training, and ensuring that this policy is communicated to all persons working for us

Working together with customers, suppliers, and business partners to encourage them to adopt the principles or similar policies with the same outcomes

Environment

Sustainability is at the heart of what we do; we are committed to protecting the environment and are continuously looking at ways to reduce our environmental footprint. We ensure that we comply with local environmental laws and regulations in all of the regions in which we operate and are adopting local and international environmental standards where relevant.

We contribute to the United Nations Sustainable Development Goals, in particular, SDG 12 “Responsible consumption and production” by providing critical storage infrastructure to European food supply chains and supporting clients to minimise food waste arisings, and SDG 7 “Affordable and clean energy”, by the initiatives to reduce our energy consumption and carbon emissions outlined below.

Air pollution

Reducing our air pollution, particularly from our transport fleet, can make a significant contribution to the air quality and health of the communities in which we operate. We are working towards this by:

- Reporting our air pollution generated, including SO_x, NO_x, PM10, PM2.5, and Pb
- Implementing new technologies and processes to minimise air pollution where practical and economic to do so, in particular from our transport fleet and transport refrigeration units

Biodiversity and habitat

Protection of biodiversity and habitat for future generations is important for us, especially when we construct new cold stores. We ensure that we protect biodiversity and habitat by:

- Complying with all applicable biodiversity laws, regulations, contractual obligations, and our company policies that govern us
- Conducting the relevant biodiversity and habitat surveys and seeking to minimise the impact on the local wildlife and habitat when we pursue construction projects



Energy, energy efficiency, and renewable generation

We are actively exploring initiatives to improve our energy efficiency and generate more renewable energy. This includes:

- Pursuing a structured and targeted company-wide energy management and investment program to improve the energy efficiency of our facilities and energy awareness of our staff
- Switching our purchased energy supply to more renewable sources, where economical to do so
- Developing on-site renewable generation such as solar where practical and economic to do so.
- Utilising fuel-efficient vehicles and trailers for our transport operations, and constantly exploring investment in alternative energy sources where practical and economic to do so
- Participating in initiatives to support the local energy grid where feasible to do so, for instance Demand Side Response programmes

Greenhouse gas emissions

We are in an energy- and fuel-intensive industry, and so our greenhouse gas emissions are significant. It is our responsibility to work towards reducing these emissions, and we are doing this by:

- Recording our scope 1, 2, and 3 greenhouse gas emissions.
- Committing to ambitious science-aligned targets to reduce our absolute Scope 1 and 2 GHG emissions 54.6% and our absolute Scope 3 emissions 32.5% by 2033 from a 2023 base year.
- Minimising refrigerant leakage by ensuring our refrigeration systems are well maintained and any refrigerant removed from the systems is captured where possible
- Ensuring our transport fleet is modern and fuel efficient, and exploring initiatives to reduce fuel consumption (such as new technology and driver training and incentives) or fuel emissions (such as biodiesel or other alternative fuel sources) where practical and economic (see *Energy, energy efficiency, and renewable generation* section above)
- Reducing our energy consumption and continuing to invest in renewable energy generation (see *Energy, energy efficiency, and renewable generation* section above)
- Working with our supply chain partners to procure sustainably and locally where possible, especially for large purchases such as construction projects

Hazardous substances

Hazardous substances need special care in their handling and disposal, in order to avoid contamination of the environment. We ensure this by:

- Ensuring that there are defined processes and procedures in place for handling of hazardous substances such as chemicals, and that staff are aware of these
- Recording all waste produced by our sites on a quarterly basis, flagging any hazardous waste separately²
- Seeking to minimise the amount of all waste, including hazardous waste that is produced, and ensuring that this is disposed of in an environmentally conscious way where possible, and in accordance with local regulations

² Constellation does not produce hazardous waste on a regular basis



Material sourcing and resource efficiency

Our material sourcing and procurement is a significant contributor to our emissions through the scope 3 category. We also recognise the importance of better managing energy and materials and reducing waste in our processes as a key factor in reducing emissions and becoming more sustainable. We do this by:

- Considering the environmental impact of our supply chain, and working with our supply chain partners to procure sustainably and locally where possible, especially for large purchases such as construction projects
- Improving our energy and fuel efficiency (see *Energy, energy efficiency, and renewable generation* section above)
- Re-using materials in our operations where possible, for instance pallets, and recycling these if not
- Measuring and reducing waste produced through our operations, and seeking to dispose of all waste in the most environmentally friendly manner

Net zero

We are committed to reaching net zero by 2050, which will be achieved by several initiatives, including:

- Determining a 5-year emissions reductions target and defining an initiative-backed net zero plan in line with industry standards
- Continuing to work towards reducing our greenhouse gas emissions (see *Greenhouse gas emissions* section above)

Physical and climate risk

We understand that environmental risk factors are becoming increasingly relevant and could have an impact on our business. We manage these risks by:

- Monitoring environmental risk factors, including physical, climate, and transition risks, as part of our risk management process, using industry-standard transition pathways and scenarios
- Incorporating these risk factors into our decision-making process and seeking to mitigate their impact where we can.

Waste

We aim to reduce the environmental impact of our waste by:

- Recording all waste produced by our sites on a quarterly basis
- Seeking to minimise the amount of all waste that is produced and ensuring that this is disposed of in an environmentally conscious way where possible (e.g. minimising the amount of waste that goes to landfill), as far as permitted by local regulations.

Training and awareness

Our staff are critical to enabling our environmental strategy, and training and awareness is a critical part of this. This includes:

- Encouraging all staff to consider the environmental consequences of their actions and to seek to minimise the impact where reasonably practicable
- Providing appropriate training to staff, for instance as part of the onboarding process, to improve their environmental awareness and encourage them to act in an environmentally conscious way (for instance encouraging warehouse staff to keep cold store doors closed)



Social

Our impact on society and the well-being of our stakeholders is an important part of what we do. We aim to make a positive contribution to the communities in which we operate through several areas outlined below.

Community development

We aim to have a positive impact on the local communities in which we operate. This includes by:

- Supporting local and international initiatives, organisations, and charitable causes relevant to our business that make a positive contribution
- Building links with our local community and government and looking at ways we can improve and strengthen relations with them
- Ensuring community and local stakeholder feedback is taken into account for major construction plans

Customer satisfaction

Customer satisfaction is a priority for us, and we pride ourselves on offering a responsive, flexible, and personalised service. We ensure that we can maintain and improve our customer satisfaction by:

- Prioritising customer service, flexibility, and responsiveness in what we do
- Ensuring that we have regular touchpoints with our customers so that we can obtain feedback in real time and act on it
- Conducting an annual customer satisfaction survey with all customers, to capture feedback and act on it to further improve our service

Diversity, Equity, and Inclusion

We believe diversity, equity, and inclusion is not only a moral imperative, but also critical to fostering a cohesive and fair workplace. It also brings benefits of helping attract and retain talent, increased innovation and creativity, and improved performance for our business. We are encouraging diversity, equity and inclusion by:

- Encouraging an inclusive culture in the workplace, including through promotion of gender equality, and seeking to increase the diversity of our workforce
- Supporting a culture in which all employees are valued and respected, and without tolerance for discrimination, bullying, and harassment
- Acting against incidents and grievances in a systematic manner

Employee engagement

Our employees are the most important thing that makes our business successful, and keeping them engaged is essential to their well-being, satisfaction, and productivity. They are the ambassadors of our brand, and their efforts keep our customers satisfied, and so this translates to external benefits too. Some of the initiatives we are working on relating to employee engagement include:

- Conducting an annual employee satisfaction survey and following up
- Investing in local and international initiatives to bring our employees together and boost morale, such as the Constellation Cup football tournament
- Keeping our employees informed of new developments through information TVs at sites and the Constellation Connects newsletter



Freedom of association

Freedom of association is a fundamental human right and an essential part of democracy. All of our employees are free to

- Choose to join or not join a trade union
- Decide to leave, or stay a member of, a trade union
- Belong to more than one trade union

at any time, and regardless of whether any trade union is locally recognised. No employee shall be discriminated against based on their trade union membership, status, or activities.

Health and safety

We have a zero-accident ambition. Ensuring good control of health and safety risks and maintaining a continuous improvement philosophy is critical in order to minimise the number of injuries occurring in the workplace or through any of our operations. This applies for health and safety of all personnel interacting with our sites and transport operation: our employees, contractors, supply chain, and visitors (including users of our facilities or local community members visiting our facilities). Some of the ways we are doing this include:

Policies and procedures

- Providing and mandating the use of a minimum level of appropriate Personal Protective Equipment (PPE) for use by all personnel in the cold store, loading docks, or by drivers in our transport operation at all times
- Ensuring all staff are qualified or certified for the role that they are performing, such as having an up-to-date forklift training
- Expecting contractors and visitors to meet the same high standards of health and safety, and ensuring that they are briefed appropriately on policies and procedures
- Providing appropriate training of safely performing procedures such as manual handling, to minimise risk of injury
- Including health and safety as part of all employee inductions
- Where applicable, supporting additional initiatives to encourage a culture of health and safety (e.g., Norges Lastebileierforbund "On the right side" program for road safety in the Nordics)

Risk management

- Ensuring that there are risk assessments in place for activities performed and risks are mitigated, where appropriate

Governance and reporting

- Starting all management meetings with a discussion on recent health and safety statistics and developments, to bring this at front of mind and ensure that this is always our first priority
- Reporting all injuries, near misses, and dangerous situations through our TQM system accessible at all sites, and following up on incidents to minimise the chance of them recurring
- Promoting a continuous improvement philosophy with a zero accidents ambition throughout our business



Labour standards and working conditions

We strive to provide a comfortable and safe environment for all our staff and comply with all relevant labour standards and regulations. This includes by:

- Managing health and safety risks and providing appropriate PPE for all staff, especially for the cold store environment (see *Health and Safety* above)
- Ensuring that staff have adequate breaks and are provided with appropriate facilities for these
- Upholding the highest ethical standards, including respect for human rights, compliance with all applicable labour laws, acting against forced or compulsory labour, child labour, and unethical working conditions and practices, in particular, as outlined in our Ethics in Business policy, for suppliers as part of the diligence process for major CAPEX expenditure

Local employment

We are a major employer in many of the towns and cities in which we operate, and aim promote local employment by:

- Providing high-quality jobs, including skilled work where training is provided
- Developing our employees' skills so that they can build a career within our company
- Establishing our brand and presence as a local employer, including through local agencies and job fairs

Social enterprise partnering

We partner with and support local and international initiatives and organisations, including social enterprises where these can make a positive impact and are relevant to our organisation (see *Community development* section above). This includes organisations that contribute to the goal of reduction of global food waste.

Stakeholder relations

We are committed to stakeholder inclusivity and ensuring effective engagement with our key stakeholders, such as our investors, community, employees, and customers. This is essential in understanding and managing their expectations, building our reputation and earning their trust, and identifying and mitigating risks early. We do this by:

- Defining a stakeholder engagement strategy and policy, and refreshing these at least annually
- Ensuring appropriate and timely stakeholder engagement, in line with the Group's stakeholder engagement policy and strategy

Governance

Good governance is critical for our organisation to function in an efficient transparent and accountable manner and minimise the risk of related incidents occurring. We are determined to fully comply with all applicable regulations and guiding principles in the jurisdictions in which we operate. We also aim to adopt the highest standards of governance and ethics of business conduct and practice. Specific examples of this are outlined below.

Audit committee structure/independence

The financial accounts of the group and regional companies are audited by external auditors. We have local audit committees comprised of the CFO, local head of finance and MD. The members of the audit



committee are independent to the external auditors conducting the audit, and can raise concerns internally, to the auditors, to external experts or legal advisors, or through the corporate whistleblowing process.

Board composition

Board composition is vital for good governance, because it affects the board's effectiveness in decision-making, oversight, and strategic guidance. We ensure our board composition is appropriate by:

- Ensuring the board is comprised of members which have a variety of perspectives and skillsets relevant to our strategic direction
- Including board representation from independent members and major shareholders
- Monitoring the composition of the Board of Directors, including for diversity metrics such as nationality and gender, and aiming to increase the diversity of the board where possible

Board ESG oversight

The Board of Directors have oversight of all material business activities, including ESG matters and key decisions relating to ESG. We ensure that this is the case by:

- Keeping the board informed of all material issues relating to ESG, through company board meetings and ad-hoc communications where necessary
- Reporting regularly to the board on key metrics and initiatives relating to ESG

Bribery and corruption

We do not tolerate bribery and corruption. We ensure that we are transparent, open, and accountable, and that any bribery and corruption is reported and dealt with accordingly by:

- Ensuring that staff are aware of our policies relating to bribery and corruption such as the Ethics in Business policy, in particular the sections on "Bribery and corruption" and "Gifts and Hospitality", and act according to this
- Ensuring that staff are aware of the whistleblowing process, including the protections of confidentiality and non-retaliation afforded to them, as outlined in the Ethics in Business policy
- Ensuring that our value of "Trust" is fully understood and prevalent throughout our business' culture, particularly in this context

Compensation committee structure/independence

The compensation committee for executive compensation is the board, of which the majority of members are not involved in the day-to-day business and so are independent. Management are not involved in determining their own compensation, as this would be a conflict of interest.

Conflicts of interest

Managing conflicts of interest is essential, to prevent the appearance of corruption (or actual corruption), which can undermine the trust that our stakeholders have in us. We also want to ensure that employees are not put in a position where they have to choose between competing obligations. Some of the ways that we do this include:

- Ensuring that all employees are aware of what can give rise to a perceived or actual conflict of interest, as outlined in our Ethics in Business policy, in particular the section on "Conflicts of interest"



- Disclosing all material conflicts of interest for key decision makers such as board members and senior management, and preventing them from influencing the outcome of relevant material business decisions, in line with our Ethics in Business policy
- Ensuring that, in particular, employees who wish to enter public service disclose this to their manager and are not under conflict of interest in doing so

Cybersecurity

Our industry is increasingly under threat of facing cyber-attacks, and so to ensure continuity of our operations and business resilience, we need to protect ourselves against these. We are doing this by:

- Evaluating and addressing cybersecurity vulnerabilities and risks within our business, including making the necessary investments in our IT infrastructure and capabilities to do this
- Introducing minimum IT and cybersecurity standards required of each location, as outlined in the relevant IT and cybersecurity policies
- Educating staff on the importance of cyber security vigilance and common threats that they may face, such as phishing
- Empowering all employees to report cybersecurity risks and incidents easily, either by contacting the IT team or through inbuilt tools (such as for email)

Data protection and privacy

We hold a large amount of data, and some of this is either confidential personal or customer data, or proprietary business secrets. It is important for us to protect this data to maintain the trust that our stakeholders hold in us, ensure that we safeguard valuable business assets, and comply with regulations. We do this by:

- Complying with all national and international requirements on data protection, including the EU General Data Protection Regulation, 2016/679 (“GDPR”)
- Ensuring that employees understand and comply with the provisions outlined in the “Protection of confidential information” section within the Ethics in Business policy
- Ensuring that confidential data is only accessible to those that need it, and that NDAs are in place with parties that need to access business secrets for specific purposes
- Maintaining strong cybersecurity measures, as mentioned in the *Cybersecurity* section above, to reduce the risk of data breaches

Delegating authority

As part of our entrepreneurial culture, we want to make sure that we maintain our rapid decision-making process and minimal bureaucracy, empowering people to make decisions, despite our rapid growth trajectory. We also need to maintain clarity and transparency when making major decision, on when these decisions require approval, and by who. This ensures that we are making decisions efficiently, consistently, and with clear lines of accountability.

- Ensuring that the Delegation of Authority policy, which makes it clear for when approvals are required (including for making or committing to purchases and signing of contracts on behalf of the business), is clear to all employees
- Ensuring situations in which authority can be delegated to other employees are made clear to all employees, including decision making, management, and projects



Executive compensation

We want to ensure our compensation structure for C-suite executives and country Managing Directors is aligned with the company's performance and long-term interests. This is achieved by:

- Establishing competitive compensation to attract and retain long term talent to our organisation
- Compensating individuals based on individual and company performance and the extent to which their objectives on these are met
- Incentivising long-term value creation, rather than short-term decision making (such as through a long-term incentive plan)
- Ensuring that executive compensation is transparent to relevant stakeholders such as major shareholders, and that appropriate approval is sought for significant changes (such as equity grants) where necessary

Fraud

We recognise that, like any company, we face the risk of fraud. This could cause serious damage to our image and reputation, internal cohesiveness and culture, and also have economic consequences. We seek to minimize this risk by:

- Ensuring that our employees understand and act in line with our values, especially "Trust"
- Ensuring that our employees understand that they are responsible for acting with integrity in their use of our assets and resources, no matter what their role is, as outlined in the Ethics in Business policy section on "Fraud prevention"
- Ensuring that staff are aware of the whistleblowing process, including the protections of confidentiality and non-retaliation afforded to them, as outlined in the Ethics in Business policy

Independence of board chair

An independent board chair is critical for good governance. We ensure that the board chair is independent by mandating that they must:

- Not hold or have previously held the post of CEO in the past 5 years
- Disclose all actual and perceived conflicts of interest, in line with our Ethics in Business policy

Lobbying activities

Lobbying is an important part of the democratic process and allows us to engage with government on public policy issues and provide information and perspectives that support our point of view. It is important for transparency to our stakeholders that if we engage in lobbying activities, this is done in a responsible manner by:

- Ensuring that all lobbying activities are in the interest of the company
- Conducting all lobbying ethically and transparently in line with our Ethics in Business policy and in particular the section on "Lobbying"

Political contributions

Employees have the right to participate in the democratic process by making political contributions from their personal funds, subject to applicable limits and regulations, or campaigning in their own time.

However, we believe that it is not in our interest as a company to make political contributions, as we prefer to focus on our core business and avoid being perceived as favouring one particular political party over another. Therefore, it is our policy to not make political contributions using company resources,



even when permitted by law, as outlined in the section on “Political contributions” within our Ethics in Business policy.

Shareholder rights

Shareholders rights is an important area that requires clarity for good governance, in order to foster trust and confidence and promote a stable corporate environment. We ensure this by:

- Documenting the rights that shareholders have in the relevant shareholders’ agreements, including voting rights, dividends, and conditions for events such as capital injections, share splits, or sale of shares
- Providing shareholders with timely and accurate information on our financial performance and key strategic developments
- Engaging shareholders as a regular part of stakeholder engagement programme

Whistleblower protection

Whilst we seek to prevent all instances of misconduct such as illegal activities, policy violations, or discrimination, we recognise that like any company, there is a risk of these activities occurring. Therefore, having a robust whistleblower and grievance process in place is crucial so that these incidents are reported without fear of retaliation, and dealt with accordingly. It is also a critical part of building trust from our stakeholders that our policies are being implemented and followed. We ensure this by:

- Publicising the availability of a robust, transparent, and predictable Whistleblowing and Grievances Policy and process accessible to all staff throughout our organisation and publicly to all external stakeholders at <https://whistleblowersoftware.com/secure/constellation>
- Ensuring that this process anonymous, safe, and prohibits retaliation
- Ensuring that the evaluation of incidents is done equitably and without discrimination, and allowing the chance of appeal against cases reported
- Learning from incidents that are reported to reduce the risk of these reoccurring in future



Reporting, Disclosure and Communications

An update on key Environmental, Social and Governance KPIs, risks and opportunities are addressed at each Constellation Board meeting. We monitor and report key ESG metrics outlined above, including injuries and fatalities, operational incidents, energy consumption and generation, greenhouse gas emissions, and other board-level or operational issues.

ESG Reporting Matrix

The below matrix provides guidance to the regions on the approach to classification of ESG incidents. Serious incidents, injuries and fatalities (i.e. level 3 or above) are reported to board members as soon as they occur and become known.

Type of Impact	Impact:				
	1 = Very Low	2 = Low	3 = Medium	4 = High	5 = Very High
Financial	< € 50k	€ 50k < € 100k	€ 100k < € 250k	€ 250k < € 500k	> €500k
Personal Injury	Non-lost time injury (employee does not take time off for recovery or is assigned modified work duties while recovering)	Minor lost time injury (examples of minor injuries include: shallow cuts or abrasions, sprains and strains, bruising or burns covering a small area of skin)	Extensive lost time injury (examples of extensive injuries include: deep cuts, severe or extensive burns, broken bones, severe bleeding, loss of consciousness)	Loss of livelihood	Death
Operational	Minor operational incident, no client impact	Minor operational incident with client impact	Incident causing temporary disruption to facility or client operations	Incident causing prolonged disruption to facility or client operations	Incident causing shut-down of facility or material disruption to client operators
Compliance	Minor breaches by individual staff members	No fine, but some disruption to services	Fine with some disruption to services	Fine and significant disruption to services	Fine and extreme disruption to services with the potential to lead to collapse of the business
Reputational	Negative coverage in local/state/social media	Series of negative coverage in local/state/social media	Extensive negative local/state/social media coverage	Extensive negative nationwide media / widespread social media coverage	Extensive extremely negative nationwide or international media coverage / viral social media coverage
Environmental	Environmental exposure immediately contained	Environmental exposure contained with active management over a short period of time	Environmental exposure contained with active management and outside assistance over a short period of time	Significant environmental exposure contained with active management and outside assistance over an extended period of time	Critical environmental exposure with significant detrimental effects

Personal Injury Reporting

At each monthly regional management review meeting, a designated employee shall present a report on the incidence and severity of employee, sub-contractor, or visitor (community or user) injury occurring on company property or at the fault of the company. The report should include statistics on the number



of injury incidents, the severity of those incidents as per the guidelines above, and the accident frequency rates described below. Statistics shall be presented monthly for the full year to date.

The Total Recordable Injury Frequency Rate (TRIFR) shall be calculated by dividing the number of injury incidents with lost time by the total number of worked hours and multiplying the resultant figure by 1,000,000.

The Lost Time Injury Frequency Rate (LTIFR) shall be calculated by dividing the number of injury incidents with lost time by the total number of worked hours and multiplying the resultant figure by 1,000,000.

The personal injury statistics should be presented to the management team in a standardised format across the Constellation Group companies in line with the below example.

Impact of injury incident	Jan	Feb	Mar	Apr	...
0 Near miss					
1 Non-lost time injury					
2 Minor lost time injury					
3 Extensive lost time injury					
4 Loss of livelihood					
5 Death					
Total lost time incidents					
Total incidents					
Number of worked hours					
Lost time Injury Frequency Rate (LTIFR)					
Total Recordable Injury Frequency Rate (TRIFR)					

Similar statistics to the above should be presented to the board at each board meeting .

Operational, Compliance, Reputational Incident Reporting

At each monthly regional management review meeting, a report on the incidence and severity of any operational, compliance and reputational incidents and customer claims, and the financial impact of such incidents should be included. Statistics shall be presented for the month and the full year to date.



Environmental Reporting

At each monthly regional management review meeting, a report on several environmental KPIs should be presented, including monthly figures for the full year to date, in line with the below example:

Environmental KPI	Jan	Feb	Mar	Apr	...
Energy					
Total energy consumption					
Energy spend					
Energy generated onsite (e.g. solar)					
% Energy Self-Generated					
Transport					
Deadhead miles					
Unplanned overnights					
Fuel economy					
Telematics output					
Truck and reefer diesel consumption					

Additionally, on an annual basis, additional KPIs are collected, including quarterly waste generation and disposal and lost workdays due to injury, and annual refrigerant top ups, company car fuel consumption, employee gender diversity, unadjusted gender pay gap, customer and employee satisfaction survey scores, and a summary of other significant ESG events that would have already been reported through the management meetings / board.

Questions and comments

All questions and comments regarding this policy should be directed via your regional ESG champion or the "Contact us" form on the website.