

Environmental, Social and Corporate Governance Policy

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Approval

Approved By Signature of Approver		Ciaran Rafferty	
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Approvers Role Within ARO		CEO	
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Author

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Review

Reviewer	Review Criteria	Issue	Date
Greg Nott	ISO 14001:2015	1.0	05-Feb-26
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Associated Documents

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260205-IMS-POL-EnvironmentalPolicy	1.0

Scope

This document is part of the Integrated Management System (IMS) for ARO and is consistent with the standards listed below and describes the Environmental, Social and Corporate Governance Policy adopted by ARO.

- ISO 27001:2022 – Information Security Management Systems
 - ISO 27017:2015 – Code of Practice for Cloud Services
 - ISO 27018:2020 – Code of Practice of Personally Identifiable Information (PII)
- ISO 9001:2015 – Quality Management System
- ISO 14001:2015 – Environmental Management System
- DSPT (Data Security and Protection Toolkit) for the NHS.
- Cyber Essentials Plus

Environmental, Social and Corporate Governance Policy Statement

Arrow Business Communications Limited, trading under the brand name ARO and its affiliated subsidiaries (hereinafter referred to as the “Group”) is committed to providing a quality service in a manner that ensures a safe and healthy workplace for its employees and minimises our potential impact on the environment. Our ESG policy ensures that social and environmental concerns are considered in all our business operations. We align our activities with the expectations of our stakeholders in relation to our economic, social and environmental impact and ensure that their interests are acknowledged and protected.

We are committed to conducting our business activities with honesty and in full compliance with current laws and regulations. As an innovative business, we continually seek better, safer, more cost effective and sustainable methods of working, while adhering to best practice.

Our policy comprises five key pillars:

1. People
2. Environment
3. Health and Safety
4. Community
5. Governance

People

Our people are our most valuable asset and are fundamental to the delivery of high-quality services to our clients. We recognise that the calibre, commitment and capability of our employees differentiate us from our competitors. As such, we are committed to attracting, developing and retaining the best talent in the industry.

We strive to create an inclusive, inspiring and supportive workplace where every employee is treated fairly, with dignity and respect. We value the contribution of a diverse workforce and do not tolerate discrimination of any kind. We are committed to developing our people, equipping them with the right skills to deliver our business strategy while supporting them to achieve their individual career ambitions.

Learning, Development and Progression

All employees are encouraged to actively manage their career development through a Personal Development Plan. This ensures that every individual has a clear route for progression, supported by appropriate technical, professional and leadership training. Maintaining high standards of safety and technical competence is essential to our success; therefore, regular training, guidance and updates are provided to all employees.

Our ARO101 Leadership Programme plays a key role in developing future-ready leaders and high-performing teams. This is supported by regular quarterly one-to-one meetings, enabling continuous improvement discussions, feedback and alignment of objectives.

The Group's Talent Assessment Tool helps identify employees who are ready for progression and supports informed development planning to ensure everyone has the opportunity to thrive.

Formal reviews are conducted with all employees, providing dedicated one-to-one time with managers to review performance, agree objectives and identify training and development needs aligned to both individual and business goals.

We also work closely with our network partners to ensure employees are fully supported during new service launches and provisioning updates, enabling the consistent delivery of a high-quality and differentiated service to our customers.

Equality, Inclusion and Fair Treatment

We are committed to equal opportunities and fair treatment across all areas of employment. Managers are provided with guidance, training and support to ensure they understand their responsibilities and manage their teams fairly, consistently and in line with legal and company obligations.

All employees are made aware of the Group's policies, procedures and legal responsibilities relating to equal opportunities. In addition, we provide neurodiversity training to all managers to build awareness, promote understanding and support the development of inclusive, high-performing teams.

In line with our commitment to fair work and social sustainability, we do not engage workers on zero-hours contracts, ensuring greater security, stability and wellbeing.

Wellbeing, Engagement and Culture

The wellbeing and resilience of our people are paramount to the Group. We actively encourage feedback and open dialogue to ensure we continue to create a positive and engaging workplace.

We regularly measure employee engagement through surveys, including Quarterly Pulse Surveys, which allow us to monitor satisfaction, track our eNPS score (benchmarked within our industry) and identify opportunities for improvement. Monthly Town Hall sessions bring the wider community together to share updates, initiatives and successes from across the Group.

Wellbeing Champions and Community

To further support wellbeing and engagement, we have dedicated Wellness Champions at each of our key sites. These voluntary roles act as a central point of contact for advice, guidance and support relating to mental health and wellbeing. Champions also play an active role in promoting and organising corporate social responsibility initiatives, helping to strengthen engagement across the Group.

All Wellness Champions have completed Mental Health First Aider training through MHFA England, equipping them with the skills required to support their colleagues. Additional members of the wider team have also completed this training. A dedicated Teams channel is used to communicate, share and promote wellbeing and engagement activities.

We provide safe and inclusive spaces for employees to collaborate, contribute ideas and drive positive change within the Group, focusing on areas such as culture and behaviour, the workplace environment and supporting one another.

Fun and Connection

Having fun together is an important part of our culture. Our quarterly FunFest events led by our volunteer Office Leads bring teams together across all office locations, providing opportunities to relax, connect and enjoy shared experiences through a variety of themed activities.

Environment

We fully recognise that our activities, products and services have the potential to impact the environment. The Group is committed to protecting the environment, preventing pollution, fulfilling our environmental compliance obligations and continually improving our environmental performance through the effective operation and implementation of ISO 14001:2015.

Environmental considerations are integrated into the business planning, procurement, operational decision making and change management activities. The group identifies and evaluates environmental aspects and impacts, associated with its operations, which include normal, abnormal and emergency conditions, whilst applying a Life Cycle Perspective from procurement to end of life disposal.

The Group is committed to:

- Complying with all applicable environmental legislation, regulatory requirements, permits, licences and other obligations
 - Preventing pollution and minimising adverse environmental impacts
 - Promoting the efficient and sustainable use of resources, including, energy, water and materials.
 - Reducing waste through the waste hierarchy of controls: Prevention, Reuse, Recycling, Recovery and Responsible Disposal
 - Avoiding or minimising the use of hazardous substances and ensuring appropriate controls where use is unavoidable
 - Embedding environmental considerations within supplier selection and supply chain management
 - Setting, monitoring and reviewing environmental objectives and targets that are aligned with business strategy and NetZero commitments
 - Continually improving the effectiveness of the Environmental Management System (EMS)
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- Promoting environmental awareness amongst our employees and encouraging them to work in an environmentally responsible manner
 - Training, educating and informing our employees about environmental issues that may affect their work
 - Assessing our suppliers based on their awareness of & minimising of their impact on the environment
 - Training the Group's buyers on identifying social and environmental issues within our supply chain
 - Communicating our environmental commitment to clients, customers and the public, by valuing, implementing and maintaining our commitment to ISO14001
 - Increasing our existing recycling facilities at our head office

- Striving to continually improve our environmental performance and minimise the social impact and damage of activities by periodically reviewing our environmental policy considering our current and planned future activities

Operational Controls and procedures are established, implemented and maintained to manage significant environmental aspects, including waste management, WEEE and IT asset disposal, energy consumption, procurement activities and environmental emergency preparedness, including Business Continuity.

Environmental performance and legal compliance is monitored and are periodically reviewed and evaluated. The EMS is reviewed through internal audits and management review to ensure continued suitability, adequacy and effectiveness.

An ISO 14001 Environmental Policy is in place that supports this ESG Policy and the requirements of ISO 14001. These policies, along with the Environmental Management System are reviewed at least annually or following significant organisational or operational change.

Health and Safety

The Group will do everything that is reasonably practicable to protect the health, safety and welfare of both our employees and any other person affected by our activities.

The Board has overall responsibility for ensuring that we maintain high standards of health and safety. However, we rely on all our employees, subcontractors and clients to play their part in effectively implementing our health and safety policy.

As part of our process, we will:

Undertake risk assessments, implement the identified control measures and ensure that safe systems of work are applied in relation to our activities
 Provide and maintain a safe and healthy working environment including safe access arrangements and suitable welfare facilities
 Provide information, instruction, training and supervision to enable employees to perform their work safely
 Promote a positive health and safety culture within the organisation, in particular consulting with employees on health and safety matters
 Ensure that all vehicles and work equipment are suitable for purpose and properly maintained
 Make available all necessary safety devices and protective equipment and supervise their use
 Take steps to assess the competence of any contractor we engage and to ensure that information is exchanged on matters relevant to health and safety
 Set and monitor health and safety objectives

The Group is committed to continual improvement in safety performance and ensuring that the delivery of the health and safety management system is adequately resourced to enable the full implementation of this policy. This commitment includes the provision of sufficient resources, management and employee time, as well as training and health and safety advisory support.

Community

The Group endeavours to contribute to the improvement of our community by supporting chosen charities through annual contributions and encouraging employees to volunteer, even during business hours. We do this through awarding all our people with 2 community impact days in addition to their annual holiday allowance.

The Group sets aside a pool of money to support the charitable endeavours of our customers. Over the past few years, we have sponsored a wide variety of activities, helping customers to raise money for their chosen cause.

Governance

The Group is committed to an ethical business culture, ensuring tax compliance and anti-bribery and corruption best practice. We have undertaken a risk evaluation to satisfactorily determine that the Group is compliant with the Criminal Finance Act 2017, and this is regularly reviewed. The Group also commits to looking at social impact and undertakes due diligence on each of its suppliers and further ensures that suppliers comply with all applicable legislation and seek to develop relationships with their own supply chains consistent with the principles set out below as a minimum.

Our principles are as follows:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Land Acquisition
6. Living wages are paid
7. Working hours are not excessive
8. No discrimination is practised
9. Regular employment is provided
10. No harsh or inhumane treatment is allowed
11. Confidentiality
12. No bribery or corruption will be tolerated
13. Environmental management
14. Quality
15. Audit and termination of agreements

As a fully accredited service provider for both fixed carriers and mobile networks in the UK, regular network meetings ensure familiarity with new and evolving technologies. All the services offered by the Group are fully approved by Ofcom (Government Communications Regulator) and our 'Code of Practice' further demonstrates how highly customer impact and feedback is valued. Arrow Business Communications Limited is also a member of the approved dispute resolutions scheme with the Communications Ombudsman and holds network accreditations with Vodafone, O2, Gamma and BT.

The Group is also a member of O2's Data Centre of Excellence, an industry leading programme which provides leadership and recognition for Partners with outstanding data and converged solutions expertise.

In 2026, the Group was awarded a bronze medal from EcoVadis, which is one of the most trusted providers of business sustainability ratings. The process assessed the Group's policies, actions and results in relation to Environmental, Labour & Human Rights, Ethics and Sustainable Procurement matters. EcoVadis evaluated and ranked the Group as being "Advanced" in the areas of Environmental Management and Ethics, which places us in the top 3rd percentile of ~ 1,000 companies that were evaluated by EcoVadis in

our Market Sector. This result shows the Group's commitment to sustainability through understanding where we are as an organisation and more importantly to help us develop a suitable strategy to continually improve in this area.

The Group are also intending to register with the Science Based Targets initiative (SBTi) and we will be purchasing carbon credits to cover 100% of our GHG emissions, resulting in carbon neutrality and will continue to do this in futures years.

As part of the Group's Net Zero strategy, the Group have commenced the following initiatives: -

Facilities: The Group will source green electricity from 100% renewable sources (where we have control and elsewhere, we will influence and encourage the same approach) and are planning to install Solar Photovoltaic (PV) panels at the relevant data centres, and commit to reviewing the possibility of renewable generation options at our other premises yearly

Company Cars; by the end of this year (2026): The Group are converting company diesel cars (plus petrol) to Electric Vehicles (EVs) or Plug-in Hybrid EVs (PHEVs).

Employee cars, business mileage; the Group are looking at a salary sacrifice scheme, to make it financially attractive for employees to convert to EVs or PHEVs.

Water: in conjunction with EcoVadis, the Group are embarking on a water consumption and wastage reduction scheme.

This Policy Statement will be reviewed at least annually by the Policy Committee, or more frequently where there have been significant changes to the Group or the nature of the Group's activities.

Senior Management Team Approval

We, the senior management team at ARO, pledge to support this Environmental, Social and Governance Policy and provide the necessary resources and guidance to achieve its objectives. Our collective commitment to information security supports our success and strengthens the trust our customers place in us.

Approved By		Ciaran Rafferty	
Signature of Approver			
Approver's Role Within ARO		CEO	
Issue	1.0	Date	06/02/2026

Signature: 

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