

Sustainability Policy

Crux Product Design

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References

01	ISO 14001:2015 – Environmental Management Systems
02	Corporate Sustainability Reporting Directive (“CSRD”, Directive (EU) 2022/2464)
03	GHG Protocol (https://ghgprotocol.org/)
04	ISO 14064-1:2018 Greenhouse Gas (GHG) Part 1: Specification with guidance at the organisation level for quantification and reporting of greenhouse gas emissions and removals
05	UK government approved emission factors (https://www.gov.uk/environment/greenhouse-gas-emissions)

06	DEFRA guidance (https://www.gov.uk/guidance/classify-different-types-of-waste-your-legal-responsibilities)
07	The Waste (England and Wales) Regulations 2011
08	The Hazardous Waste (England and Wales) Regulations 2005
09	WEEE Regulations 2013

Abbreviations	
CDP	Carbon Disclosure Project
CSRD	Corporate Sustainability Reporting Directive
EMS	Environmental Management Systems
ESG	Environmental, social, and governance
FTE	Full Time Equivalent Employees
GHG	Greenhouse Gases
GRI	Global Reporting Initiative
QMS	Quality Management System
QOB	Quality Objective
SBTi	Science Based Target initiative
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations

1. PURPOSE

Crux is committed to minimising environmental impact, driving continuous improvement in environmental performance, promoting social equity, and upholding human and labour rights across its own operations and throughout its supply chain.

This Sustainability Policy outlines Crux's approach to integrated sustainability, in line with the requirements of all interested parties and stakeholders. Sustainable initiatives and objectives are embedded within Crux's operational processes to ensure awareness and adoption of sustainable practices throughout the organisation (including employees, contractors and through the supply chain).

Within this policy, **initiatives** refer to actions or programs implemented at Crux to address sustainability issues and **objectives** are targets that define the measurable goals used as performance indicators.

2. SCOPE

Crux Product Design Group (Crux) is a corporate group headquartered in the UK comprised of (i) Crux Product Design Ltd, registered in England and Wales and (ii) Crux Product Design LLC, incorporated under the laws of the state of Massachusetts, USA. Crux is committed to integrating sustainable practices across all areas of business operation. In alignment with the requirements and principles of ISO 14001:2015, and in compliance with all applicable legal, regulatory, and other sustainability-related obligations, Crux will:

Prevent pollution and reduce environmental impacts through sustainable product design, responsible material sourcing, and waste minimisation;

- **Prevent pollution and reduce environmental impacts** through sustainable product design, responsible material sourcing, and waste minimisation.
- **Continuously improve** the Environmental Management System (EMS) and environmental performance by setting measurable objectives, monitoring results, and regularly reviewing progress.
- **Engage employees and stakeholders** by providing training, resources, and open communication to strengthen participation in environmental initiatives.
- **Collaborate with suppliers and clients** to promote sustainable procurement and responsible practices across the value chain.
- **Disclose sustainability performance** through globally recognised ESG platforms, including EcoVadis, CDP, the Global Reporting Initiative (GRI), and the United Nations Global Compact (UNGC).

As a medium-sized enterprise under the European Commission's definition, Crux is not directly obligated under the EU Corporate Sustainability Reporting Directive (CSRD). However, with a client base including large enterprises, certain CSRD requirements—particularly those concerning sustainability-related data provision across the value chain (Section 6.2)—are maintained and addressed through Crux's approach to sustainability. Crux's commitment to public disclosure and sustainability reporting, outlined in Section 4.5, ensures compliance with these applicable requirements.

To meet all compliance obligations, and the expectations of both internal and external stakeholders, Crux has established procedures and policies that address all aspects where there is potential for significant impact on people and the environment – *i.e.* 'material topics' (see Section 4). As legislations differ across the UK and US, there are location-specific policies implemented within each of the material topics as organised within the four pillars of sustainability (see Figure 1):

- **Economic** – Creating sustainable value and resilience through responsible business practices and efficient resource use.
- **Environmental** – Protecting the planet by reducing impacts, conserving resources, and supporting climate and biodiversity goals.
- **Governance** – Ensuring transparency, accountability, ethical conduct, and compliance with laws and standards.
- **Social** – Advancing equity, well-being, human rights, and positive community impact.

Crux Sustainability Pillars

Economic

🔴 Anti-corruption

Corruption in the workplace can include extortion, bribery, conflicts of interest, fraud, and money laundering.

Crux maintains a zero-tolerance policy towards corruption.

Policies

POL04 Business Conduct Policy [UK/US](#)
POL06 Corporate Credit Card Policy [UK](#)
POL23 Whistleblowing Policy [UK/US](#)
POL24 Travel & Expenses Policy [UK/US](#)
POL32 Disciplinary Policy [UK](#)
POL35 Sustainability Policy [UK/US](#)
POL44 US Employee Handbook [US](#)

Reporting

EcoVadis: FB100, FB3102, FB3301

🔴 Procurement

Sustainable procurement considers social, environmental, and economic factors, including whole-life costs, potential risks, and broader impacts on society and the environment.

Crux promotes sustainable procurement by assessing sustainability practices across our supply chain and using targeted questions to gain insights into suppliers' efforts, enabling informed and responsible purchasing decisions.

Policies

SOP02 Suppliers Selection & Management Procedure [UK/US](#)
POL35 Sustainability Policy [UK/US](#)
SOP15 Nonconformance & Corrective Action [UK/US](#)
POL44 US Employee Handbook [US](#)

Reporting

EcoVadis: CAR132, LAB100, SUP100, SUP305, SUP320

🔴 Client Engagement

Crux is committed to sustainable practices in project selection and client communication.

Policies

POL35 Sustainability Policy [UK/US](#)
SOP28 Feedback & Complaints [UK/US](#)

Reporting

EcoVadis: ENV300

Environmental

🔴 Emissions

Greenhouse gas emissions (CO₂, CH₄, N₂O, SF₆, PFCs, HFCs) are released directly and indirectly through company activities.

Crux monitors Scope 1, 2, and 3 emissions in line with the GHG Protocol and sets improvement initiatives based on all findings.

Policies

POL35 Sustainability Policy [UK/US](#)
POL40 Business Continuity Plan [UK/US](#)

Reporting

EcoVadis: CAR130, CAR133, CAR134, CAR135, CAR137, ENV6001, ENV630, GEN300, GEN5004
CDP: 201, 20.2, 20.3, 20.4, 20.5, 20.7, 20.8, 20.10, 20.11, 20.16, 20.17, 211
GRI: 305-1, 305-2, 305-3, 305-4, 305-5, 2-5
UNGC: EI-E7, EI0, EI4, G2-G5, G7

⚡ Energy & Water

Energy consumption includes electricity, fuel, and renewable sources used in operations and transport. Green energy supports long-term sustainability without depleting resources.

Crux procures 100% renewable energy and utilises on-site solar panels. Crux continuously monitors energy usage and embeds energy-conscious practices into our culture.

Policies

POL35 Sustainability Policy [UK/US](#)

Reporting

EcoVadis: ENV300, ENV313, ENV640
CDP: 2015
GRI: 302-1
UNGC: EI-E4, EI8-12, G2-G5, G7

🗑️ Waste

Waste includes the use of raw materials and chemicals, as well as non-hazardous and hazardous waste generated through operations.

Crux continuously monitors waste, including electrical and hazardous, to monitor waste streams and to comply with relevant regulations.

Policies

POL12 Employee Handbook [UK](#)
POL35 Sustainability Policy [UK/US](#)

Reporting

EcoVadis: ENV300, ENV3551, ENV620
UNGC: EI-E4, EI0, EI5, G2-G5, G7

🚚 Transport

Employee commuting and transport of goods contributes to carbon footprint.

Crux encourages sustainable commuting and tracks deliveries to support informed, eco-friendly decisions relating to transportation.

Policies

POL12 Employee Handbook [UK](#)
POL35 Sustainability Policy [UK/US](#)
POL10 Flexible Working Policy [UK](#)

Reporting

EcoVadis: CAR133

Governance

🧑‍🤝‍🧑 Diversity & Equal Opportunity

Discrimination in employment refers to any distinction, exclusion, or preference that disadvantages individuals in the workplace based on attributes unrelated to job performance—such as race, colour, religion, sex, disability, political opinion, national origin, or social background.

Crux is committed to preventing workplace discrimination and values the strength and benefits of a diverse workforce.

Policies

POL07 Equity, Diversity & Inclusion Policy [UK/US](#)
POL12 Employee Handbook [UK](#)
POL19 Recruitment & Induction Policy [UK/US](#)
POL35 Sustainability Policy [UK/US](#)
POL43 EDI Strategy [UK/US](#)
POL44 US Employee Handbook [US](#)

Reporting

EcoVadis: LAB100, LAB3601, LAB601, SUP320
UNGC: HR/L2, HR/L4

🔒 Information Security

Information security involves protecting critical infrastructure, key services, and personal data. It requires robust systems to prevent breaches and promote transparency and accountability in governance.

Crux is committed to meeting regulatory requirements to safeguard the personal data of employees and all individuals whose information Crux handles.

Policies

SOP13 Information Security, Backup & Recovery Procedure [UK/US](#)
POL13 Information Security [UK/US](#)
POL08 Subject Access Request Policy [UK](#)
POL17 Personal Data Breach Policy [UK](#)
POL12 Employee Handbook [UK](#)
POL18 Records Management Policy [UK](#)
POL44 US Employee Handbook [US](#)
POL35 Sustainability Policy [UK/US](#)
POL36 Employee Privacy Notice [UK/US](#)

Reporting

EcoVadis: FB100, FB3102, FB3301, LAB601

Social

👤 Working Conditions & Employee Wellbeing

Working conditions include hours, employee satisfaction, participation, remuneration, and social benefits.

Crux seeks to foster an inclusive environment where employees feel valued, with clear access to benefits and transparent career development.

Policies

POL01 Anti-bullying & Harassment Policy [UK/US](#)
POL02 Bereavement Policy [UK/US](#)
POL09 Sickness Absence Policy [UK](#)
POL10 Flexible Working Policy [UK](#)
POL12 Employee Handbook [UK](#)
POL14, POL16, POL20 Parental Leave Policies [UK](#)
POL22 TOIL Policy [UK/US](#)
POL31 Career Development Policy [UK/US](#)
POL33 Grievance Policy [UK](#)
POL35 Sustainability Policy [UK/US](#)
POL38 Sabbatical Leave Policy [UK/US](#)
POL42 Annual Leave Policy [UK](#)
POL44 US Employee Handbook [US](#)

Reporting

EcoVadis: LAB100, LAB312, LAB3201, LAB340, LAB3601, LAB601, LAB6012
UNGC: G2-G7, HR/L2, HR/L4

👤 Human Rights

Human rights include security, property, privacy, civil and political freedoms, freedom of association, collective bargaining, social and cultural rights (including those of Indigenous peoples), and protection from harassment or inhumane treatment.

Crux is committed to upholding and protecting the rights of all employees and others impacted by Crux's activities.

Policies

POL01 Anti-bullying & Harassment Policy [UK/US](#)
POL03 Child Protection Policy [UK/US](#)
POL12 Employee Handbook [UK](#)
POL33 Grievance Policy [UK](#)
POL35 Sustainability Policy [UK/US](#)
POL44 US Employee Handbook [US](#)

Reporting

EcoVadis: LAB100
UNGC: G2-G5, G7, HR/L2, HR/L4

👤 Health and Safety

Health and Safety in the workplace includes both physical and mental risks, such as those from hazardous substances, unsafe equipment, or poor work practices.

Crux actively seeks to manage and mitigate all risks to employees and on-site contractors through clear safety processes, particularly concerning equipment and infrastructure in the workshop and laboratory.

Policies

POL11 Occupational Health & Safety Policy [UK/US](#)
POL12 Employee Handbook [UK](#)
POL35 Sustainability Policy [UK/US](#)
POL44 US Employee Handbook [US](#)

Reporting

EcoVadis: LAB100, LAB312, LAB601
UNGC: G2-G5, G7, HR/L2, HR/L4



Figure 1: Crux Sustainability Pillars, Material Topics and ESG Reporting Alignment.

3. ROLES AND RESPONSIBILITIES

ECOVADIS (ENV313/GEN703), CDP (17.1/21.2), GRI (2-13) & UNGC (G1, G3)

All employees, suppliers and contractors: This policy applies to all Crux employees, contractors and suppliers who are all expected to adhere to the Supplier Code of Conduct.

Top Management: Crux's Top Management (including directors, heads of functions and chiefs) holds overall responsibility for this policy, ensuring alignment with Crux's sustainability goals and regulatory requirements. Top Management has delegated responsibility to the Quality team for oversight of sustainability at Crux. Top Management and the Quality team gather on a quarterly basis to review the objectives set out in this policy.

Quality team: The Quality team conducts internal audits and assessments to review and monitor the policy's implementation and continual improvement of Crux's EMS via the relevant compliance obligations. All Quality Management System (QMS) and EMS objectives are captured within the 'Quality Objectives' spreadsheet which are routinely reviewed by Top Management within management review meetings.

Sustainability Pod: The Quality team are supported by the Sustainability Pod (comprised of employees from across functions), who maintain awareness of key environmental issues and play a key role in the collection of data to enable Crux to monitor progress towards sustainability Objectives.

Procurement team: The Procurement team are responsible for upholding the quality objectives relating to ethical and sustainable supplier selection.

This policy, alongside sustainability objectives, are reviewed annually by the Top Management of Crux and the latest version is publicly available on the Crux website.

3.1 Policy Implementation

To ensure the effective implementation of this policy across our operations, Crux will undertake the following actions:

- Communicate this policy to all employees, suppliers, and relevant subcontractors, making it accessible to all interested parties.
- Ensure documented training of awareness of this policy for all employees.
- Raise awareness among employees about the environmental impacts of their roles and tasks. Additionally, ensure that all personnel understand their obligations under this policy statement and adhere to the principles and contents of our EMS.
- Inform all suppliers of the requirement for compliance with our Supplier Code of Conduct when providing goods and services to Crux (and monitor suppliers that are signing up to relevant conduct agreements).
- Allocate management and resources to meet our environmental and sustainability objectives.

Crux will continually monitor and review environmental and sustainability performance, aligning with the Sustainability Policy with annual review by Top Management and the Quality team to ensure ongoing suitability. Crux is committed to implementing improvements as necessary in relation to any identified inadequacies or where commitment or objectives are failing to be met.

4. REPORTING

ECOVADIS (GEN600), GRI (3-2) & UNGC (HR/L1)

4.1 Definition of Materiality

In the GRI reporting framework, **material topics** are the issues that reflect an organisation's most significant impacts across the four pillars of sustainability: economic, environmental, social, and governance. These topics closely align with the United Nations Global Compact's (UNGC) sustainability topics, also referred to as **issue areas**, which include Human Rights, Labour, Environment, and Anti-Corruption. Relevant material topics or issue areas are identified through a **materiality assessment** that considers both stakeholder concerns and the organisation's operational context. By focusing on material topics, companies ensure their sustainability reporting is relevant, impactful, and aligned with broader goals of transparency, strategic focus, and sustainable development.

4.2 Materiality Assessment

A materiality assessment is conducted every year, following the GRI-3 guidance, to assess the severity and likelihood of the risks associated with each material topic (or issue area) covered in this policy. Scoring relates to identifiable risks based on the context of Crux and all relevant business and operational risks, established with input and review from Top Management. Severity and likelihood are scored 1 – 5 with 5 being most severe/most likely, respectively, with significance calculated by multiplying these together.

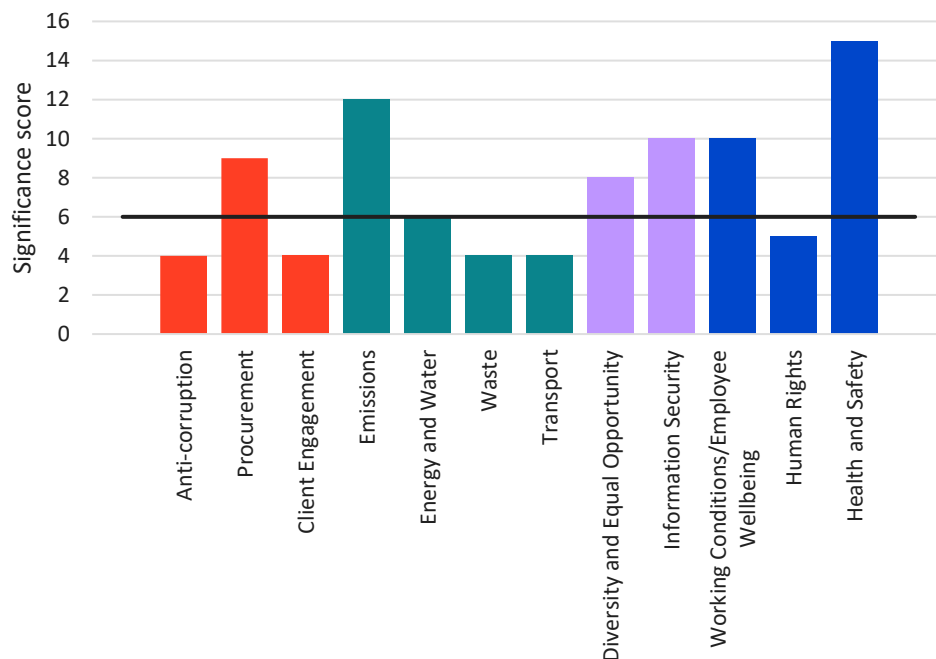


Figure 2: Significance of Material Topics.

The threshold for requiring investment in resource to track, monitor and report the findings from the material topics is set by a score of 6. This is either at medium severity with a low-medium likelihood or a low-medium severity with a medium likelihood, or greater. As shown in Figure 2, the material

topics that meet the threshold include procurement; emissions; energy and water; diversity and equal opportunity; information security; working conditions and employee wellbeing; health and safety. Human rights will also be included as a significant material topic due to the nature of the risks being directly relating to the safety of individuals.

Whilst this provides guidance on where the focus should be for reporting and reviewing, all topics are included in this policy and in the Annual Sustainability Report.

4.3 Materiality for Human Rights and Labour

In addition to the principal materiality assessment, a focused evaluation of Human Rights and Labour issues (in line with the UNGC's HR/L1 guidance) assesses risks and opportunities related to labour practices and human rights across the value chain. This assessment addresses key topics such as non-discrimination, fair wages, forced and child labour, and working conditions, considering the severity of impacts and the concerns of stakeholders, particularly vulnerable groups. The findings help determine whether these are significant issues that should inform strategy, risk management, and disclosure in alignment with GRI and UNGC principles. The top Human Rights and Labour issues (up to six) identified through this process are deemed the most significant and should be explicitly integrated into Crux's sustainability framework.

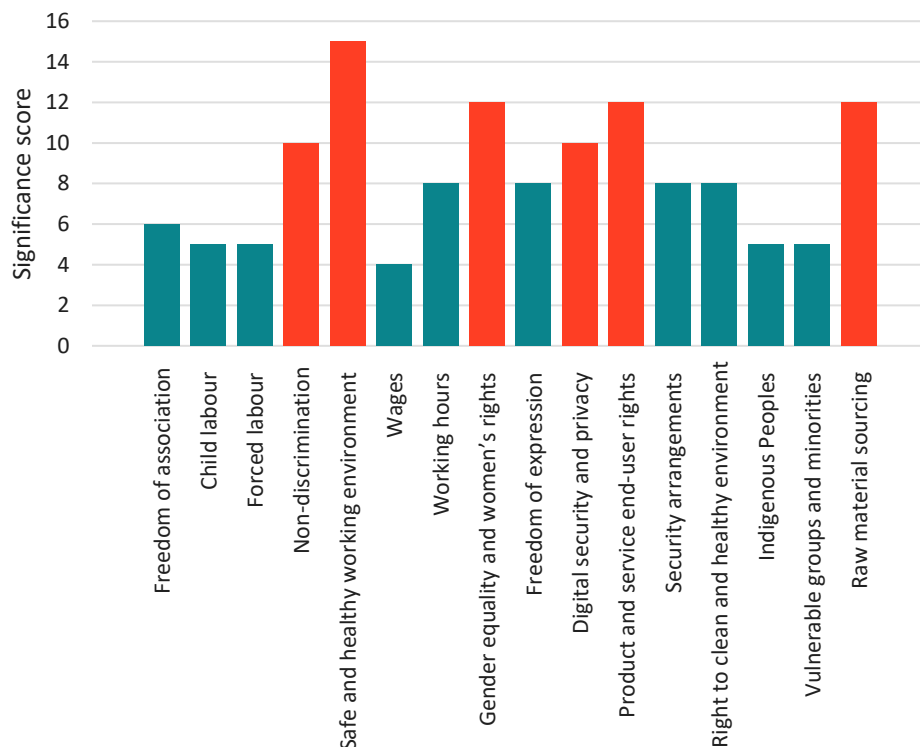


Figure 3: Materiality Assessment of Material Topics under Human Rights & Labour.

Materiality assessment of Human Rights and Labour identified the following issues as having significant impact (see Figure 3):

(1) **Non-discrimination**, reflected in inclusive hiring, leadership development, and equitable design

- (2) **Gender equality and women's rights**, supported through workplace culture and STEM outreach
- (3) **Safe and healthy working environment**, essential due to Crux's lab testing and prototyping activities
- (4) **Digital security and privacy**, given the use of advanced digital tools and the need for ethical data handling
- (5) **Product and service end-user rights**, especially in healthcare, where usability, dignity, and accessibility are central
- (6) **Raw material sourcing**, where design decisions influence ethical and sustainable supply chain practices despite not being a manufacturer

These areas of significant impact are actively addressed through Crux's sustainability activities, embedded within relevant internal policies, and monitored through ongoing practices. They are also reported on in Crux's annual sustainability report, ensuring transparency and accountability across the company's human rights and labour commitments.

4.4 Annual Sustainability Report

Crux's **Annual Sustainability Report (ASR)** is a central to demonstrating commitment to transparency and responsible business practice. The ASR aligns with leading frameworks including EcoVadis, CDP, the UN Global Compact (UNGC), and the Global Reporting Initiative (GRI). Materiality assessment informs the key areas of focus for reporting, highlighting where Crux has the most significant human rights, labour, environmental, and governance impacts. However, the ASR also addresses all required topic areas in accordance with the expectations of these frameworks, ensuring a comprehensive and balanced disclosure. Crux's ASR is publicly available on the website and is submitted through the GRI and UNGC platforms, reinforcing accountability and alignment with international standards.

4.5 Sustainability Reporting

Crux reports the initiatives, objectives and progress to leading Environmental, social, and governance (ESG) disclosure frameworks: EcoVadis, CDP, the Global Reporting Initiative (GRI), and the United Nations Global Compact (UNGC). Submission to EcoVadis focuses on the processes and policies Crux has in place to improve the sustainability of the outcomes of each of the aspects listed in this policy. Submission to CDP focuses on the Greenhouse Gas (GHG) inventory and financial impacts on Crux of environmental risks and opportunities and is made publicly available through the CDP website. The ASR is aligned with GRI requirements and is submitted to GRI and UNGC, being made publicly available on the GRI and Crux websites.

4.5.1 Sustainability Reporting Alignment

Alignment of all reporting requirements for EcoVadis, CDP, GRI, and the UNGC are defined across all material topics in Crux's Sustainability Policy in Figure 1. Each topic is mapped to the relevant clauses or criteria within these frameworks, ensuring that Crux's sustainability strategy is both comprehensive and aligned with leading ESG standards. This structured approach promotes consistency, avoids duplication of effort, and enhances the credibility and comparability of our disclosures across diverse stakeholder platforms.

5. ENVIRONMENTAL POLICY

ISO 14001:2015 (CLAUSE 5.2)

Crux is committed to protecting the environment and enhancing environmental performance as an integral part of its sustainability strategy and ISO 14001-certified Environmental Management System (EMS). This commitment supports the long-term wellbeing of people and the planet, and reflects Crux's values of innovation, responsibility, and continuous improvement.

Crux will achieve its environmental commitments by:

- Preventing pollution and minimising adverse environmental impacts throughout the product development lifecycle, including design, testing, and operations.
- Promoting the sustainable use of energy, water, materials, and other resources, with a focus on reduction, reuse, recovery, and recycling.
- Taking action to mitigate and adapt to climate change and contributing to the protection of biodiversity and ecosystems.
- Complying with all applicable environmental legal and regulatory requirements, as well as other obligations relevant to its environmental aspects.

Crux is committed to the continual improvement of its EMS by:

- Integrating environmental considerations into strategic and operational decision-making processes.
- Assessing environmental risks and opportunities and setting science-based targets verified by the Science Based Targets initiative (SBTi).
- Monitoring environmental performance through data analysis, internal audits, and quarterly management reviews.
- Openly communicating environmental performance to employees, contractors, suppliers, customers, regulators, and the wider community.
- Reporting annually on greenhouse gas emissions via the Carbon Disclosure Project (CDP), publishing a sustainability report that is aligned with Global Reporting Initiative (GRI) standards - submitted to the United Nations Global Compact (UNGC), EcoVadis.

To support implementation of this policy, Crux will:

- Communicate this policy to all employees, suppliers, and relevant subcontractors, and make it publicly available via the company website.
- Provide training and raise awareness to ensure all employees understand their environmental responsibilities in accordance with this policy and the overarching Sustainability Policy.
- Require suppliers to comply with Crux's Supplier Code of Conduct and complete a Sustainability Questionnaire to demonstrate responsible environmental practices.
- Allocate appropriate resources and management attention to achieve established environmental objectives and targets.

This policy is approved by Top Management and will be reviewed annually to ensure its continued suitability, adequacy, and effectiveness in supporting Crux's environmental goals and compliance obligations.

6. ECONOMIC PILLAR

6.1 Material Topic: Anti-Corruption

6.1.1 Scope

Corruption in the workplace can include extortion, bribery, conflicts of interest, fraud, and money laundering. Crux maintains a zero-tolerance policy toward such activities.

6.1.2 Roles and Responsibilities

All Crux employees are responsible for following the business conduct guidelines as outlined in POL04. Line Managers are responsible for maintaining awareness of guidelines relating to whistleblowing and disciplinary processes to appropriately define and inform interactions with team members. The People team, with Top Management, are responsible for oversight of all relevant policies (POL04, POL23 and POL32) and will review them, at least, annually to ensure alignment with ongoing business activities and all applicable regulatory requirements.

6.1.3 Initiatives

- Maintain a zero-tolerance policy for corruption (as outlined in POL04 – Business Conduct Policy), ensuring transparency and ethical conduct in all activities.
- Implementation of a confidential reporting mechanism (supported by POL23 – Whistleblowing Policy) to enable employees and stakeholders to safely report suspected corruption or misconduct.
- Ensure fair and consistent accountability measures are implemented for breaches of ethical, legal, or policy standards through clear and consistent consequences (defined in POL32 – Disciplinary Policy).
- Conduct independent annual financial audits to ensure transparency, detect irregularities, and reinforce anti-corruption controls to ensure ethical financial management and compliance.
- Implement an internal purchasing approval process (as defined in SOP25 – Purchasing Process) to ensure that all purchases are properly reviewed and authorised—promoting transparency, accountability, and reducing the risk of corruption or conflicts of interest in procurement.
- Maintain policies to provide guidance to employees on company expenses including through Corporate Credit Card Policy (POL06) and Travel & Expenses Policy (POL24).

6.1.4 Objectives

- Financial accounts are audited on annual basis (Finance team), including in 2025 and beyond.
- > 95% of critical suppliers agree to our Code of Conduct, within 2025 and beyond.

6.2 Material Topic: Procurement

6.2.1 Scope

Sustainable procurement relates to the management of ESG risks and impact through the supply chain with a focus on human rights, labour practices, environmental protection, and anti-corruption.

Crux is committed to managing the risks of adverse environmental and social impacts in our supply chain by embedding sustainability into our internal purchasing processes through the use of targeted questions to gain insights into suppliers' efforts, enabling informed and responsible selection of suppliers that is informed by their implementation of environmental and social best practices.

SOP02 (Supplier Selection and Management) is the main procedure relating to sustainable procurement at Crux, please refer to the procedure for all relevant information on supplier selection and management at Crux.

6.2.2 Roles and Responsibilities

The Procurement team are responsible for the maintenance of sustainable procurement practices and the associated procedure SOP02. The supplier SOP (SOP02) is reviewed, at minimum, annually to ensure all reasonable steps are taken to improve sustainability in Crux's upstream value chain. The procurement team, alongside the quality team, conduct an annual review of suppliers to ensure that sustainability performance is maintained and all relevant information is up to date.

6.2.3 Initiatives

- Maintenance of a Code of Conduct and requirements for all critical supplier to agree to this and sign a relevant agreement.
- Maintenance of a risk-based supplier management system where critical suppliers are subject to greater levels of scrutiny prior to, and during, product and service delivery.
- Maintenance of supplier management documentation and tracking logs to ensure that processes have been followed and that appropriate records are maintained to inform supplier decision making.
- Maintenance of improvement processes in line with SOP02 and SOP15 (Nonconformance and Corrective Action).
- Implement sections in the Supplier quality questionnaire to gather information on the size and diversity of a company (within their top management) and policies in place for various labour, corruption and environmental issues.
- Review supplier management through annual audit of performance to ensure continued compliance with procedural requirements.

6.2.4 Objectives

- > 60% of critical suppliers have completed the Supplier Quality Agreement, within 2025 and beyond.
- > 60% of suppliers have completed the sustainability questions during onboarding, within 2025 and beyond.
- Increase spends by at least 10% on small, local and diverse suppliers by end of 2025.
- Conduct supplier management reviews and implement actions for improvement, as appropriate, within 2025 and beyond.
- 90% completed training across SOP02 and POL35, within 2025 and beyond.

6.3 Material Topic: Client Engagement

6.3.1 Scope

Crux is committed to engagement with clients regarding promotion of sustainability, integration of sustainability in client proposal and collaborative efforts with clients on ESG-related initiatives.

Crux actively collaborates with clients on sustainable design projects to enhance the environmental performance of products and devices—both on the market and during development. These projects span not only core product components but also packaging and digital elements, broadening opportunities to reduce environmental impact through thoughtful design choices, such as material selection, design optimisation, and reducing reliance on bulky printed media. Crux also employs advanced digital tools, including simulation, to support virtual testing and modelling. This approach significantly lowers the environmental footprint by reducing the need for physical prototypes, laboratory resources, and associated material use.

6.3.2 Roles and Responsibilities

The Commercial team is responsible for developing sustainability-focused projects with Crux's client base and leading initial client engagement to promote enhanced environmental performance and operational efficiency. The Design and Engineering teams drive innovation through EcoDesign principles, making efficiency-led design decisions that improve device marketability and functionality while actively reducing or eliminating non-sustainable components and materials.

6.3.3 Initiatives

- Provide & promote sustainable design services for client projects.
- Maintain client feedback and engagement, monitored according to the process described in SOP28 – Feedback & Complaints.
- Initiate EcoDesign platform to monitor and promote project activities where environmental enhancements are being achieved across design, development and testing projects.

6.3.4 Objectives

- Initiate EcoDesign platform (including reporting and tracking) by end of 2026.

7. ENVIRONMENTAL PILLAR

7.1 Material Topic: Emissions

7.1.1 Scope

Greenhouse gas (GHG) emissions—including CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, and NF₃—are released directly and indirectly through Crux's operations and value chain. Crux monitors and reports emissions in accordance with the GHG Protocol, the world's most widely used greenhouse gas accounting standard. The protocol provides a comprehensive framework for measuring and managing emissions from private and public sector operations.

In line with the GHG Protocol, Crux assesses emissions across all three scopes:

Scope 1: Direct GHG emissions from sources owned or controlled by Crux (*e.g.*, fuel combustion in company vehicles or equipment).

Scope 2: Indirect emissions from the generation of purchased electricity, heating, or cooling consumed by Crux offices and labs.

Scope 3: All other indirect emissions occurring in the value chain, including emissions from business travel, employee commuting, purchased goods and services, and waste disposal.

Crux uses this emissions data to drive targeted reduction initiatives, such as improving energy efficiency, minimising business travel, and adopting lower-impact procurement practices. This ensures a proactive approach to managing climate-related risks and improving environmental performance.

7.1.2 Roles and Responsibilities

Maintenance of the GHG Inventory is overseen by the Quality and Data Analytics team with the support of the Sustainability pod in gathering operational data to calculate emissions data.

7.1.3 Initiatives

Refer to Section 7.2.3 for energy-relates initiatives.

7.1.4 Objectives

Crux is committed to delivering an emissions reduction pathway consistent with the 1.5 °C ambition of the Paris Agreement. Our approach is guided by two key actions, both of which have been validated by the Science Based Target initiative (SBTi), ensuring that our goals meet the requirements of the Paris Agreement’s climate objective. Crux’s objectives as part of the plan towards net zero by 2050 are outlined in Figure 4.

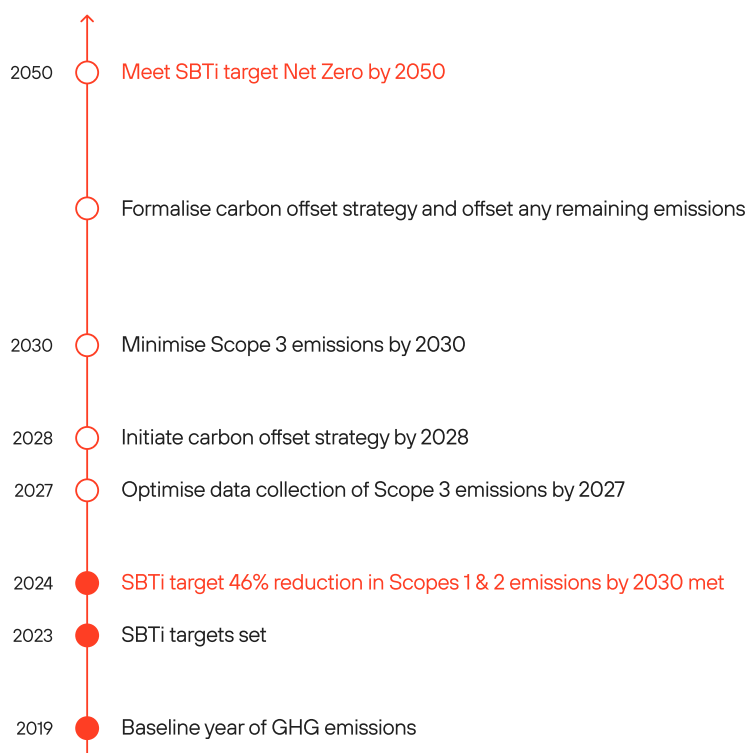


Figure 4: Timeline for Achieving Net Zero by 2050.

7.1.5 GHG Accounting

Crux's GHG emissions inventory is reviewed annually and presented during the Management Review as part of the continuous evaluation of environmental objectives. The inventory is subject to third-party verification and is disclosed publicly through annual submission to the Carbon Disclosure Project (CDP), ensuring transparency and accountability. As outlined above, emissions sources are categorised in accordance with Scopes 1, 2, and 3 of the GHG Protocol. At Crux, these scopes correspond to the following areas of business operations:

- Direct (**Scope 1**) emissions originate from sources owned or controlled by Crux. At Crux this is derived from our air conditioning system and fluorinated gases (F gases) used as refrigerants. At servicing, refrigerant consumption is recorded and UK government approved emission factors are used to calculate the CO₂ emissions generated from these refrigerants.
- Indirect (**Scope 2**) emissions originate from the consumption of purchased electricity, heat, or steam by Crux. At Crux, these emissions arise from electricity and heating usage, which is based on actual energy consumption data and converted using UK government-approved emission factors to ensure consistency and accuracy in reporting. Further information on Scope 2 emissions and Market-Based Reporting strategies see Section 7.1.6.
- Indirect, upstream (**Scope 3**) emissions originate from sources not owned or controlled by Crux. At Crux, the following Scope 3 categories are applicable:
 - Category 1 – Purchased goods & services
 - Category 2 – Capital goods
 - Category 3 – Fuel and energy related activities
 - Category 4 – Upstream transportation and distribution
 - Category 5 – Waste generated in operations
 - Category 6 – Business travel
 - Category 7 – Employee commuting

7.1.6 Scope 2 Emissions and Market-Based Reporting

Crux utilises a market-based approach for calculation of Scope 2 emissions according to GHG Protocol guidance. This approach is utilised as Crux based on selection of 100% renewable energy suppliers based on their provision of renewable energy contracts. To maintain the commitment to 100% renewable energy and zero Scope 2 emissions from supplied energy (*i.e.* zero GHG emission factor), only energy providers who provide energy according to government-recognised contractual instruments, such as the provision of renewable energy attribute certificates (*e.g.* Renewable Energy Guarantees of Origin, REGO) are utilised by Crux.

In the UK, REGOs are recognised and administered by the national energy regulator Ofgem (<https://www.ofgem.gov.uk/environmental-and-social-schemes/renewable-energy-guarantees-origin-rego>) in accordance with the Electricity (Guarantees of Origin of Electricity Produced from Renewable Energy Sources) Regulations 2003. The equivalent contractual instrument in the European Union is Guarantees of Origin (GoOs), governed by the Renewable Energy Directive (EU Directive 2009/28/EC). As Crux is based principally in the UK (with satellite offices in the US), REGOs are the main instrument by which supply of the 100% renewable energy is assured. For Crux's US operations, the equivalent contractual instrument is through Energy Attribute Certificates (EABs)

(<https://www.epa.gov/green-power-markets/renewable-energy-certificates-recs>), such as Renewable Energy Certificates (RECs).

To assure energy provision is fully covered by the appropriate contractual instrument (*i.e.* REGOs in the UK and RECs in the US) Crux maintains information from the energy provider confirming they maintain valid REGO/REC certificates that covers the energy provided to Crux over the reporting period and valid supplier declaration (*e.g.* tariff information or terms and conditions) confirming that the energy supplied to Crux is 100% renewable with a zero emission factor for the purpose of Scope 2 emissions calculation.

7.1.7 Climate Adaptation

The Business Continuity Plan (POL40) identifies climate change as an environmental risk and outlines Crux's approach to adaptation through risk mitigation strategies. In alignment with UNGC (E7) and GRI (201-2) standards, the plan integrates climate-related risks into long-term business continuity measures, ensuring operational resilience under multiple climate scenarios.

7.2 Material Topic: Energy and Water

7.2.1 Scope

Energy consumption includes electricity, fuel, and renewable sources used in operations and transport. Green energy supports long-term sustainability without depleting resources.

7.2.2 Roles and Responsibilities

The Sustainability Pod is responsible for the implementation and continuous improvement of Crux's energy efficiency and waste management initiatives, supported by the Operations Team and guided by the strategic direction of Top Management. The pod meets fortnightly to review the effectiveness of current initiatives, ensure compliance with applicable regulations, and identify new opportunities to reduce environmental impact. Members also monitor emerging legislation and industry best practices to support informed decision-making and drive continuous progress toward Crux's sustainability objectives.

7.2.3 Initiatives

By implementing measures to conserve water and energy, Crux seeks to contribute to global efforts to combat climate change and adhere to regulatory and legislative requirements related to environmental sustainability. The following initiatives are in place at Crux to meet energy and water-related objectives:

- Installation and maintenance of photovoltaic panels on Crux facilities to reduce external energy consumption and generate renewable energy.
- Conducting regular maintenance and monitoring of photovoltaic panels to ensure maximum output.
- Deployment of motion-triggered LED lights in facilities, automatically turning off after 20 minutes.
- Assessment and review of energy suppliers and tariffs, with a commitment to continued use of a 100% green tariff for electricity supply.
- Prioritisation of A-rated energy efficient electrical appliances for use in Crux facilities.

- Regular maintenance of district central heating system controlled with individual radiators, set to a fixed level in the winter to maintain a constant temperature in each office.
- Regular maintenance of all water fixtures (including kitchen units, plumbing, taps and toilets).
- Power saving modes installed on all computers and monitors that switch to sleep mode when not in use.
- Reduce heating and electricity consumption through smart meter analysis.
- Scheduling regular maintenance for all electrical and mechanical systems to ensure they are running efficiently.
- Implementing a digital and paperless culture using tools such as Adobe Sign for digital signatures and limiting any paper records to the absolute minimum.
- Ensure buildings are adequately insulated, particularly around windows and doors, to maintain temperatures more efficiently.
- Maximising the use of natural light by arranging desks near windows and using light coloured furniture.

7.2.4 Objectives

- Maintain solar panels to generate at least the same energy in 2025 as in the previous year.
- Refer to Section 7.1.4 for emission-related objectives.

7.3 Material Topic: Waste and Recycling

7.3.1 Scope

Crux is committed to managing waste and recycling in accordance with environmental best practices, with a focus on minimising waste at source, promoting responsible material use, and ensuring safe disposal. This includes careful handling and segregation of raw materials and chemicals used in prototyping and testing, as well as the management of non-hazardous (*i.e.* packaging, general office waste) and hazardous waste (*e.g.* chemical residues, solvents) generated during operational activities. Crux prioritises recycling and recovery wherever possible and works with licensed waste contractors to ensure all waste streams are tracked, labelled, and disposed of compliantly, in line with applicable regulations.

7.3.2 Roles and Responsibilities

The Sustainability Pod is responsible for leading the implementation and management of Crux's waste and recycling initiatives, with operational support provided by the Operations Team and oversight from Top Management. The pod meets fortnightly to review the effectiveness of current measures, monitor compliance with regulatory requirements, and identify opportunities for continuous improvement. Members also stay informed on emerging best practices and share relevant updates to ensure Crux remains aligned with its sustainability objectives.

7.3.3 Initiatives

Crux's waste management policy is focused on aligning waste-related practices with the organisation's broader environmental sustainability goals, aiming to reduce environmental impact and promote resource efficiency across operations. This policy also ensures compliance with relevant regulatory

and legislative requirements, including those governing hazardous waste disposal and data protection, to mitigate the risk of fines, legal liability, and reputational harm.

Crux applies the waste hierarchy (Figure 5) when making decisions relating to effective recycling and waste management, in line with DEFRA guidance and The Waste (England and Wales) Regulations. Other recovery could include energy recovery incineration.



Figure 5: Crux Waste Hierarchy.

Crux's approach to sustainable recycling and waste management focuses on optimising material use, reducing waste generation, and improving energy efficiency across all business operations. These efforts support Crux's broader environmental objectives while ensuring compliance with applicable regulations.

- **Material Optimisation:** Crux applies lean principles to minimise material waste, collaborates with suppliers to source sustainable materials, and integrates resource-efficient design practices that reduce material use without compromising quality.
- **Hazardous Waste Management:** All hazardous waste is collected by licensed waste contractors for appropriate treatment, such as incineration, in full compliance with The Hazardous Waste (England and Wales) Regulations.
- **Waste Reduction Initiatives:** Crux implements a range of actions to minimise waste generation, including: avoiding over-packaged goods, servicing and repairing tools and equipment to extend their lifespan, purchasing durable, energy-efficient or reusable products, using concentrated products and refills, replacing disposable cups with glasses and mugs, using digital communication in place of printed materials, electronic invoicing for clients and suppliers and introducing rechargeable batteries across the organisation.
- **Reuse Initiatives:** Crux encourages reuse through selection of products with reusable packaging, reusing office supplies, donating reusable items, facilitating internal reuse via the employee intranet noticeboard, repair and reuse of IT hardware.
- **Recycling Initiatives:** Crux provides clearly labelled recycling bins throughout its facilities, including dedicated containers for general recyclables, soft plastics, batteries, metals, PCBs, hazardous waste and electrical and electronic equipment. All sources of waste are collected and disposed of in accordance with legal requirements.

7.3.4 Objectives

- Improve the technique of waste data collection and analysis by the end of 2026.

7.4 Material Topic: Transport

7.4.1 Scope

Employee commuting and the transport of goods are recognised contributors to Crux's overall carbon footprint. While there are currently no direct compliance requirements specific to transportation, Crux acknowledges the environmental impact of these activities and incorporates them into its broader emissions reduction strategy in line with Scope 3 reporting under the GHG Protocol.

7.4.2 Roles and Responsibilities

The Sustainability Pod is responsible for implementing and maintaining Crux's transport-related sustainability initiatives, with operational support from the Operations Team and oversight from Top Management. The pod meets fortnightly to review the effectiveness of existing measures, explore new ideas to reduce transport-related emissions, and ensure alignment with current and emerging compliance requirements. Members also share insights on best practices and innovations to support continuous improvement in sustainable commuting and logistics.

7.4.3 Initiatives

Crux's Sustainable Travel Policy highlights the importance of raising employee awareness around the carbon impact of travel and actively supports initiatives that help reduce transport-related emissions. To guide responsible travel choices, Figure 6 presents a travel hierarchy that can be used to inform decisions related to commuting, business travel, and leisure activities.

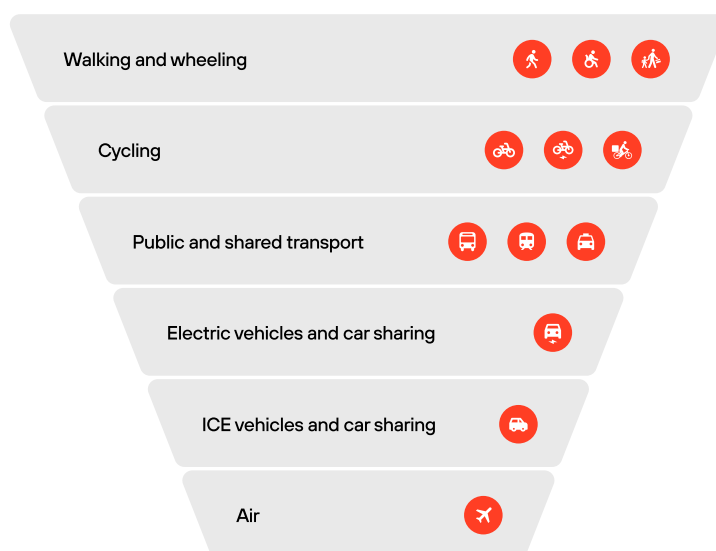


Figure 6: Crux Sustainable Travel Hierarchy.

Crux is committed to reducing the carbon footprint associated with transportation, recognising its significant environmental impact. While travel is a necessary aspect of business (such as attending client meetings, site visits, and conferences), this policy is designed to support sustainable decision-

making in all transport-related activities. Where possible, **digital communication tools** are prioritised to reduce the need for in-person meetings and travel. Crux assesses the necessity and suitability of attending conferences or client meetings, encouraging staff to use virtual meetings for routine interactions and reserving travel for project-critical engagements.

Crux has introduced the following sustainable travel initiatives to support the commitments stated above:

- Low-impact transport modes are encouraged, including public transport, car-sharing, walking, or cycling.
- Cycling to work is actively supported through a secure indoor bike storage, on-site shower facilities, access to the Cycle to Work Scheme and British Cycling Membership, availability of repair tools and spare parts in the Crux Workshop.
- Crux staff are equipped with virtual meeting technology to reduce the need for travel.
- Travel to Central London should be by train where possible; if not feasible, shared car use is preferred.
- When hiring vehicles, staff should choose low-emission or fuel-efficient options.
- Air travel is limited to situations where alternative modes are not viable. Crux's designated travel agency supports lower-emission options and provides carbon emissions reporting, overseen by the Procurement team.
- To reduce unnecessary travel, employees are encouraged to avoid returning to the office after 4 pm following external meetings or events, unless business needs require otherwise.
- All new suppliers are evaluated on their travel and delivery policies as part of Crux's sustainable procurement process.

In addition, Crux conducts regular sustainability surveys to review employee travel habits and collect feedback on further improvements. A flexible working policy (POL10) enables employees to avoid peak travel times and utilise remote working where appropriate, further reducing commuting-related emissions.

7.4.4 Objectives

- Initiate and implement a strategy for management of carbon footprint associated with business travel by end of 2026 to support net zero strategy.

8. GOVERNANCE PILLAR

8.1 Material Topic: Diversity & Equal Opportunity

8.1.1 Scope

Crux is committed to promoting Diversity and Equal Opportunity by fostering a workplace where individuals of all backgrounds can thrive, contribute, and succeed. Crux values the unique perspectives that come from a diverse team and believe that inclusivity drives innovation, collaboration, and long-term success. Equal opportunity at Crux means ensuring that employment decisions are based solely on skills, experience, and performance, free from bias related to race, colour, gender identity, sexual orientation, age, religion, disability, national origin, political opinion, or

social background. Through this commitment, Crux aims to build a culture of respect, fairness, and belonging.

8.1.2 Roles and Responsibilities

The People team are responsible for implementing and maintaining Crux's diversity & equal opportunity related sustainability initiatives. The EDI Pod are responsible for monitoring the progress on the actions listed on the EDI Strategy (POL43) and preparing this document for review by Top Management.

8.1.3 Initiatives

- Promote gender equality, equity diversity and inclusion through implementation of the Equity, Diversity and Inclusion Policy (POL07) and the Employee Handbook (POL12).
- Maintain and implement the Recruitment and Induction Policy (POL19).
- Maintain and track progress of the EDI Strategy (POL43).
- Conduct an annual pay equity review.

8.1.4 Objectives

- Refer to POL43 – EDI Strategy.

8.2 Material Topic: Information Security

8.2.1 Scope

Information security at Crux involves safeguarding critical systems, key services, and the personal data of employees, clients, and other stakeholders. This policy describes the implementation of robust technical and organisational controls to prevent unauthorised access, data breaches, and misuse of information and data under Crux's control. Crux is committed to maintaining transparency, accountability, and compliance with applicable data protection regulations, ensuring that all personal and sensitive data is managed securely and responsibly across all areas of the business.

8.2.2 Roles and Responsibilities

The Operations and IT team are responsible for maintaining compliance with all relevant data and information security processes and policies at Crux. These are reviewed annually, at minimum, to ensure they align with current business requirements and current regulations.

8.2.3 Initiatives

- Maintain privacy notices for external stakeholders (UK and US) as well as for employees (POL36); ensure the external facing privacy notices can easily be found on the Crux website.
- Maintain SOP13 – Information Security, Backup and Recovery Procedure.
- Maintain POL13 – Information Security Policy.
- Maintain POL17 – Personal Data Breach Policy.
- Maintain POL08 – Subject Access Request Policy.
- Maintain POL18 – Records Management Policy.
- Maintain the Business and IT Risk Register and update this on at least an annual basis.

8.2.4 Objectives

- Maintain zero number of confirmed data breaches within 2025.
- Assess the Information Security Policy (POL13) against 100% of Crux sites, by end of 2025.

9. SOCIAL PILLAR

9.1 Material Topic: Working Conditions and Employee Wellbeing

9.1.1 Scope

Crux recognises that working conditions and employee wellbeing are essential to maintaining a safe, inclusive, and productive work environment. This includes areas such as work-life balance, mental health support and fair working hours – for which Crux maintains separate policies and processes to manage (as outlined in Figure 1).

Crux is committed to encouraging and supporting all employees in working to the best of their abilities. As part of Crux's commitment, every effort will be made to help team members acquire the skills and knowledge to carry out their responsibilities by providing appropriate training and support. Additionally, Crux is committed to providing employees with formal, annual performance reviews (refer to POL37 – Performance Management Policy). Crux is committed to fostering these aspects of wellbeing by creating a workplace where employees are supported, respected, and empowered, and by integrating physical, psychological, and social wellbeing into everyday operations and long-term business planning.

9.1.2 Roles and Responsibilities

The People team is responsible for overseeing Crux's approach to working conditions and employee wellbeing, ensuring all related policies and practices comply with applicable employment law and address relevant Human Resources (HR) issues. This includes fostering a safe, inclusive, and supportive work environment, promoting mental and physical wellbeing, and upholding fair and flexible working arrangements. The People team are also responsible for managing HR matters such as grievances, performance management, and absence, while supporting professional development and monitoring compliance with legal and regulatory requirements. Working in partnership with managers and employees, Crux ensures pro-active commitment to employee wellbeing is embedded across all levels of the organisation.

9.1.3 Initiatives

- Ensure that all Crux personnel understand their obligations under relevant policies and are fully enabled to support employee wellbeing and positive working conditions with at least 90% policy training completed across relevant policies.
- Ensure employee benefits (including health-related benefits) are maintained for all employees.
- Provide transparency to employees on procedure for career enhancement and development.
- Tracking of working hours and review of employee overtime at Management Review meetings.
- Maintain impartial process to allow all employees to raise concerns about Crux activities and conduct through a Grievance Policy (POL33) and Whistleblowing Policy (POL23).

9.1.4 Objectives

- < 110% working hours on an employee level compared to contractual hours within 2025.
- 90% of employees to have completed latest milestone review in 2025 and beyond to maintain regular permanent employee development plans.

9.2 Material Topic: Human Rights

9.2.1 Scope

Crux is committed to upholding the core international labour standards established by the International Labour Organisation (ILO). As a UK-based company, Crux operates within a legal framework that incorporates these standards into national legislation, ensuring compliance as part of routine business practice. In addition, Crux has established internal policies and procedures that address key labour and human rights issues, reinforcing its commitment to fair, safe, and equitable working conditions (Figure 1).

9.2.2 Roles and Responsibilities

The People Team is responsible for ensuring Crux's approach to human rights is embedded in workplace policies and practices, in line with UK law and international standards. This includes promoting non-discrimination, safe working conditions, and fair employment practices, while managing related HR matters such as grievances, conduct, and inclusive recruitment. Working closely with managers and employees, the team ensures Crux's human rights commitments are upheld across the organisation.

9.2.3 Initiatives

Crux upholds and protects the rights of all employees and others impacted by Crux's activities by the following:

- Maintain POL03 – Child Protection Policy.
- Maintain POL01 – Anti-bullying & Harassment Policy.
- Maintain POL33 – Greivance Policy.
- Freedom of association - Crux employees are free to join labour unions, or other representative bodies of their choice without fear of retaliation. This principle is embedded in our commitment to promote an open and inclusive environment.

9.2.4 Objectives

- Maintain employee pay at above the National Living Wage within 2025 and beyond.

9.3 Material Topic: Health and Safety

9.3.1 Scope

Health and Safety at Crux covers all risks to employee and contractor wellbeing, including both physical hazards—such as hazardous substances, unsafe equipment, or poorly maintained infrastructure—and other possible risks such as stress or fatigue. Crux is committed to proactively identifying, managing, and mitigating these risks through clear safety procedures, training, and

ongoing monitoring. Focus is given to the safe use of workshop and laboratory equipment, ensuring that all activities are conducted in a controlled and compliant environment.

9.3.2 Roles and Responsibilities

The Operations team is responsible for maintaining POL11 – Health and Safety Policy, ensuring it is reviewed at least annually to reflect current business needs and comply with applicable regulations. The Lab Manager plays a key role in overseeing day-to-day health and safety practices within the laboratory and workshop environments, ensuring that equipment, infrastructure, and procedures meet safety standards. Together, the Operations team and Lab Manager work to ensure a safe and compliant working environment for all employees and on-site contractors.

9.3.3 Initiatives

- Maintain POL11 – Occupational Health and Safety Policy.
- Reporting mechanism maintained so that all workplace incidents to Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- Maintain calibration and servicing schedules for all lab equipment.
- Maintain procedures and training records for employees who use lab equipment.
- Monitor the office environment including temperature, air quality, lighting and desk arrangement.
- Operations team to organise, conduct and document weekly fire alarm testing, bi-annual fire drill and fire risk assessments and procedures.
- Maintain awareness throughout Crux facilities of identity and contact details of first aiders (including for mental health).

9.3.4 Objectives

- < 2 physiological or psychological work-related incidents reported within 2025.
- No RIDDOR instances within 2025.
- Ensure 100% of laboratory equipment is calibrated within ± 2 weeks of the scheduled service due date, maintaining compliance with standards and minimising operational downtime, within 2025 and beyond.