BYTES TECHNOLOGY GROUP PLC

(Incorporated in England and Wales)
Registered number: 12935776

WASTE AND WATER POLICY

Introduction – Scope and Purpose

The Bytes Technology Group plc and its subsidiaries (the "**Group**") recognises the importance of its impact on the environment through the use and disposal of resources. In addition to measuring and targeting our carbon emissions, we have also committed to monitoring and establishing targets to reduce our water usage and waste. We take our responsibility in the lifecycle of resources above and beyond what is required through regulations. This policy outlines the background, targets, and actions, as well as progress to date. The policy is divided into two sections, water, and waste.

Who does this policy apply to?

This policy applies to the Group and each of its subsidiaries (**Bytes Software Services Limited** and **Phoenix Software Limited**). The policy applies to owned offices, where waste and water use can be measured and action taken to reduce usage. However, the training and education element will be across all employees.

Water

Bytes Technology Group's operations are within the UK, all water used by the Group is sourced from the mains through UK utility companies. Defra (2021) identified the regions in the south, where our Leatherhead, Reading, Portsmouth, and London offices are as 'Serious' under their water stress classification and 'Not Serious' for our locations in the North of England, York, Manchester, and Salford. Globally the UK has been identified by the World Resources Institute Aqueduct (WRI Aqueduct) Baseline Water Stress as Low-Medium (10-20%), however the UK's drought risk is measured at Medium – High. This means that although none of our water is sourced from areas the WRI deem as being under 'high water stress', however, with the impacts of climate change including increasing drought periods, we can't be complacent in the UK about water availability, and the Group is taking steps to measure and reduce water use.

Water use is metered at our owned offices. Usage is predominantly from drinking, bathroom facilities, including showers, and for washing up and dishwasher facilities in the kitchens. All water is sourced from the local water authorities through the mains, and wastewater returned to the wastewater to mains drains and sewers. Rainwater is captured at the Pocklington office and re-used in the biodiversity enhancing pond, or to water the surrounding gardens. Owned offices' showers and toilets have been designed to use less water and further water saving measures will be assessed during refurbishments or with advances in technology.

The Group's policy is to undertake water efficiency measures where possible. However, absolute use may increase if activities, such as encouraging active travel and physical fitness, as there is the expectation that the showers on premises might be used more frequently. Efficiencies will be achieved through increasing improvements in water saving measures such as sensors taps, which are predicted to save 50-75% of water use per tap, as well as through education initiatives.

Wastewater is calculated as 95% of water used and enters the drains and sewers owned by the local water companies.

Actions to reduce water use

- **Bathroom facilities**
  - Transition to sensor taps, where possible.
  - Check showers for low flow options.
  - Assess flush for toilets is correct, with the short flush time different for male and female toilets.

- **Kitchen facilities**
  - Ensure dishwashers are only run when full and used in preference to hand washing.

- **Gardens**
  - If the office has watering requirements, consider installing water butts to capture rainwater for re-use in the garden and to top up the biodiversity pond (Phoenix).

- **Hidden Leaks**
  - Consider engaging a contractor to conduct a survey for hidden leaks from pipework every three years.

- **Refurbishments**
  - During refurbishments consider efficient systems that reduce water use and wastage.

- **Education**
  - Incorporate information on water reduction targets and actions individuals can take to reduce water wastage through onboarding, regular updates, and annual training, as part of a broader sustainability training package.

Water Use Reduction Targets

Our targets are to reduce water usage based on a per employee basis to the equivalent from a 2023/24 baseline.

1. 25% reduction by 2030/31 (England has a target of 20% reduction by 2038)
   Usage target of 1.73 m^3 per employee per year by 2030/31
2. 30% reduction by 2040/41
   Usage target of 1.62 m^3 per employee per year by 2040/41

As wastewater is calculated at 95% of water used, this will have the same reduction targets by percentage.

Water Usage Performance

Location	Water usage per reporting year (m³)		Water use per employee from 2023/24 to 2024/25 (m³)
	2023/24	**2024/25**	
Surrey, UK	1428	1350	2.26 ➝ 1.76
East Yorkshire, UK	1012	1025	2.41 ➝ 2.14
Total UK	2440	2375	2.31 ➝ 1.91
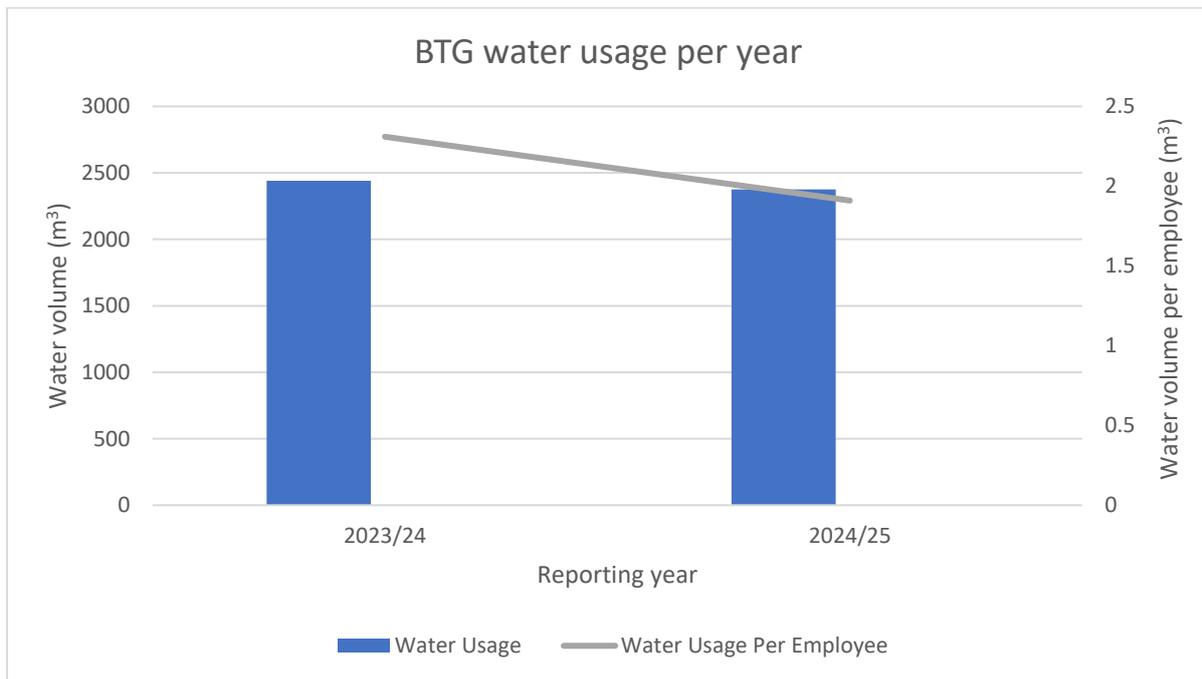
Waste

Waste is an inevitable part of society and business and it is our legal, as well as moral duty, to dispose of waste in the most environmentally safe manner and take every opportunity to reduce waste and recycle. We actively promote a circular economy model across our operations and supply chain.

Bytes Technology Group adheres to the priority list of Refuse, Reduce, Reuse and Recycle. General waste is used as a last resort. The Group is committed to reducing waste going to landfill and uses waste handlers that prioritise energy-from-waste facilities for disposal. For waste disposal we are also complying with the Duty of Care under section 34 of the Environmental Protection Act 1990.

We do not supply hardware from our offices and so packaging of goods does not apply to our business, however we do have waste from consumables and marketing materials that are purchased, as well as the day-to-day waste from consumption of food and drink at our offices. Our targets and waste measurements apply to owned facilities, where we can control the waste provider and recycling streams, however we will work with our landlords for leased offices to improve recycling, as well as educate staff across the business. Future office space

will also have waste and water policies of landlords be taken into consideration alongside greenhouse gas emissions reduction policies and other sustainability practices.

All generated waste is in the UK and reputable licenced waste carriers are used to collect and process the waste. All paperwork is stored for the requisite time for both non-hazardous and hazardous waste. In March 2025, the introduction of food waste bins was made mandatory through the Simple Recycling legislation under the Environment Act 2021, this led to food waste bins being distributed to our offices.

Non-Hazardous Waste

Non-hazardous waste is collected in five main streams.

1. Dry Mixed Recyclables
2. Glass
3. Paper
4. Food
5. General Waste

There are additional streams in different offices, which are specific to their needs. Each operating company is also looking to add streams where further items could be recycled.

Hazardous Waste

In our operations, hazardous waste comes from electronic items such as IT equipment, other consumable electronics such at disposable vapes and batteries. In 2019, it was reported, that only 17.4% of e-waste produced globally was formally collected and recycled. With the components of e-waste harbouring heavy metals, with the potential for serious pollution problems. E-waste is expected to increase in the UK and globally through the decrease in cost of electronic items, although a reduction will be seen due to the banning of the sale of 'disposable' single use vapes in the UK in June 2025.

The Group disposes of all electronic items through routes that comply with the Waste Electrical and Electronic Equipment Regulations 2023, our legal duty of care for waste and Hazardous Waste Regulations.

Our servers are used until end-of-life before they are disposed of through licenced Waste Electrical and Electronic Equipment (WEEE) Directive compliant routes. Smaller electronics such as laptops, are securely wiped and will be reused by the business or donated to charities and non-profit organisations. Many of our devices are re-used through laptop donations to charity, return of items to manufactures or sold / given to employees. Where that is not possible these electronics will also be collected through a WEEE compliant carrier and recycled for their component parts. The Group also allows, and encourages, employees to bring in their own electronics for WEEE disposal, to promote the reuse of precious materials, and reduce the need for newly mined metals. The offices have collection points for batteries and disposable vapes, so we can dispose of these responsibly.

Hazardous waste may also apply to cleaning products, solvent containers and biodiesel containers. Where possible, cleaning products are sourced that are eco-friendly and where there are hazardous materials used, these containers and products are handled appropriately.

Actions to reduce waste

- **Electronic waste (WEEE):** Where possible, devices are to be repurposed and reused by the business or through donations to good causes. Where devices are end-of-life they must be securely wiped (for data holding devices) and collected by a licenced WEEE handler – this includes batteries and disposable vapes* We actively promote a circular economy model across our operations and supply chain, and promote take back schemes from our suppliers.
- **Cleaning products:** Where possible, purchased cleaning products will be environmentally and ecologically friendly. Where the product may be identified as hazardous, this will be used in accordance with health and safety, and environmental requirements and the packaging disposed of correctly.
- **Single use plastics:** all options must be explored to remove single used plastics for a more sustainable alternative – e.g. plastic cups, plastic bottles in vending machines, coffee cups and lids. Issuing reusable water bottles and travel coffee mugs are a good way to provide an alternative, as wells as having washable mugs in the kitchen areas.
- **Food waste:** All food waste must be put into the designated food waste bins. With the exception of coffee grounds from the coffee machine which are made available for employees to take home at Leatherhead, or tea bags which are composted on site at Pocklington. Leftover catered food from meetings is made available to others in the offices.
- **Dry mixed recycling:** washed out and dry plastic containers, cans, tins, and paper should be placed into recycling bins. Recycling bins must be available at owned offices and landlords engaged with if not available at leased offices.
- **Glass:** glass is to be cleaned and put in these separate recycling bins.
- **Paper:** The Group maintains a digital-first approach to documentation and communication to reduce paper use through printing.
- **Additional recycling:** Pocklington and Leatherhead already have a mix of additional recycling streams (e.g. Coffee cups, crisp and confectionary packets and blister packs at the Pocklington office, ink cartridges at the Leatherhead office). Further options to be explored to increase recycling rates.
- **Packaging:** Aim to have all packaging to be recyclable or reusable, and we will work with suppliers to minimise packaging waste. Where possible, deliveries should be consolidated to reduce packaging requirements.
- **Marketing materials:** Consideration of the lifecycle of the produced materials must be taken and products that are biodegradable or made from recycled materials must be a first consideration.
- **Reuse:** Where possible, packing materials from deliveries to the office should be reused. A culture of fixing rather than replacing should be engendered.
- **Refuse:** Requested items, particularly consumables, should be refused if alternatives are available for re-use. This applies to IT peripherals, consumables, furniture etc. Sustainable procurement policies should be consulted.
- **Education:** Employees should be made aware of recycling and waste targets through onboarding, regular updates, and annual training, as part of a wider sustainability communication piece.

Where issues arise, for example, recycling rates decrease, overall waste increases or waste streams become contaminated, the Group Sustainability Manager should be consulted and actions taken by the operating company to improve compliance with this policy.

*As of June 1, 2025, the sale and supply of disposable (single-use) vapes are banned in the UK, therefore the collection of these will be finite, once those sold prior to the ban have made their way to end-of-life.

Waste Reduction Targets

- 0% to landfill by 2027/28
- 50% of waste recycled by 2030/31
- 65% of waste recycled by 2035/36

Reduction in overall all waste weight on a per employee basis

- 15% reduction by 2030/31 from a 2023/24 baseline
  - Target a maximum of 19.1 kg per employee by 2030/31

- 25% reduction by 2040/41 from a 2023/24 baseline
  - Target a maximum of 16.9 kg per employee by 2040/41

Waste Performance

Financial Year	Total Waste (kg)	General (kg)	Recycled (kg)	WEEE (kg)	% Recycled (inc. WEEE and food waste*)	Total waste per employee (kg)
2023/24	23,824	13999	9346	479	41.2%	22.5
2024/25	23,073	13383	9037	653	42%	18.5

*Food waste will be included from FY 2025/26.

Quantity of waste by waste stream
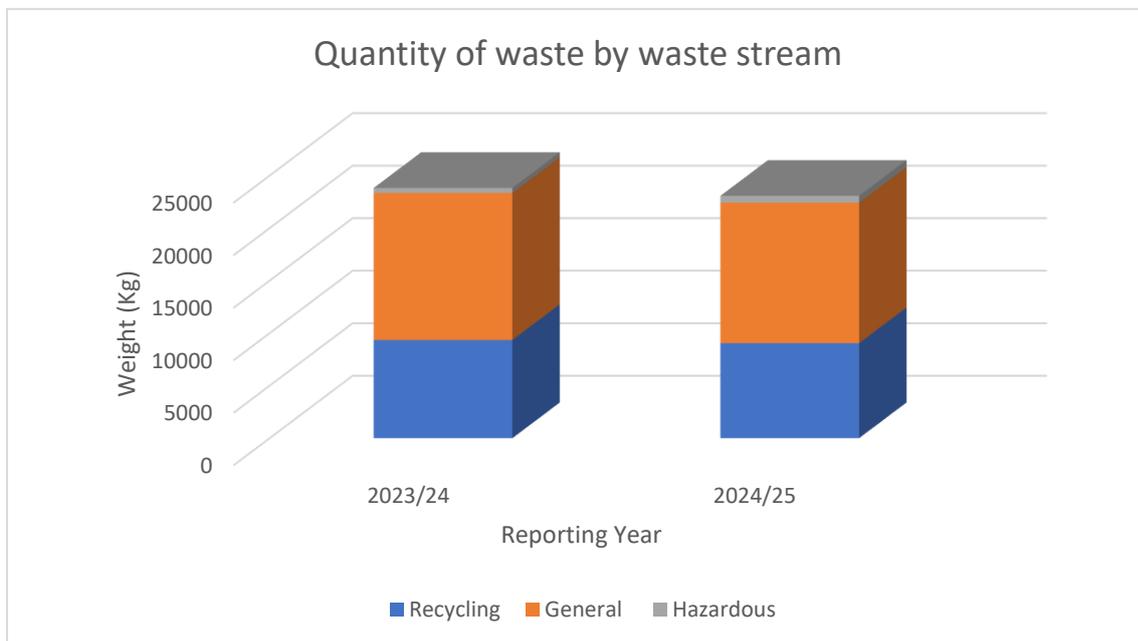
This policy will be updated on an annual basis or as and when required to account for changes such as new legislation. Progress on targets will also be reported in our Annual Report and Accounts.

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Policy Owner	Group Sustainability Manager
Version	2.0
Approver	BTG Plc Board
Approval Date	11 March 2026