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# Corporate Social Responsibility Policies

## Economics for the Environment Consultancy Ltd

### (eftec)

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*This policy statement is available to all our staff members, clients, suppliers and interested parties and is published on our website. It is reviewed on an at least annual basis and amended where appropriate.*

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# 1. Corporate social responsibility

eftec integrates its business values and operations to meet our own expectations and those of our stakeholders. Stakeholders include our customers, employees, investors, suppliers, the local community, and nature.

- We recognise that our responsibilities to these stakeholders are integral to our business. We aim to demonstrate how we shape our business policies and actions accordingly;
- We take seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy;
- We have an open and honest approach to communicating our strategies, targets, performance and governance to our stakeholders; and
- Our Chief Executive Officer (CEO) is responsible for the implementation of this policy and will make the necessary resources available to realise our responsibilities. Each member of our staff is informed about this policy and their role in implementing it.

Our focus:

- We aim for a high level of business performance while minimising and effectively managing risk, ensuring that we uphold the values of honesty, partnership and fairness in our relationships with all our stakeholders;
- Where possible/appropriate, we support the development of our staff, interns, and external stakeholders through training courses and make our facilities available to our business partners;
- Our contracts clearly set out the agreed terms, conditions and the basis of our relationship with our clients and suppliers and operate in a way that safeguards against unfair business practices;
- We aim to create and maintain strong relationships with key suppliers and contractors, and to choose suppliers that share our ethos in relation to employment practices, quality, and environmental controls. We encourage suppliers to adopt responsible business policies and practices;
- We register and resolve customer complaints in accordance with our Quality Management Policy;
- We support and encourage our employees to help local community organisations and activities and charities, including pro-bono or discounted work;
- We regularly engage interns at eftec. They are paid the London Living Wage to ensure access to intern opportunities is not restricted by an individual's economic circumstances.
- We operate an equal opportunities policy for all present and potential future employees and offer our employees clear and fair terms of employment and provide resources to enable their continual development;
- We maintain a clear and fair employee remuneration policy;
- We provide safeguards to ensure that all employees, and interns of whatever nationality, race, religious belief (or absence of it) or sexual preferences are treated with respect and without sexual, physical or mental harassment;
- We provide, and strive to maintain, a clean, healthy and safe working environment in line with our Health and Safety policies and safe systems of work; and
- We implement environmental policies and objectives as part of the business planning cycle.

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## 2.Environmental / Sustainability

We take great care in practising what we advise. Given the subject matter of our work which recognises, measures and values wellbeing beyond financial and market returns, eftec inherently operates with a social and environmental remit. We work to create positive value for nature and society and good value for money for our clients. We choose projects and clients that share the same values and objectives so that we have the opportunity to create such positive value.

### 2.1 Our objectives

As an office-based company with no direct impact on land use, we do not have a biodiversity or conservation policy, but we apply the following objectives:

- Comply with all relevant environmental legislation;
- Identify and manage environmental risks and hazards and prevent pollution to land, air & water;
- Reduce emissions to air resulting from the energy we use and our activities (e.g. by minimising travel);
- Efficiently use natural resources through minimising use and reuse where possible to increase our efficiency and reduce waste and - where waste is unavoidable - implement practices to divert waste from landfill as much as possible (e.g. minimise use of paper, recycle what's used and discarded);
- Promote the co-operation of all our employees through training, consultation and awareness raising;
- Monitor our environmental impacts through our annual Environment Report to assess relevant environmental risks, offset unavoidable emissions, and use the results as a basis for continual improvement;
- Encourage our subcontractors and suppliers to utilise sound environmental practices and sustainable resources;
- Consider the environmental impacts of products and services we purchase: buying electricity produced by renewable sources, using low-energy fluorescent bulbs, controlling air cooling/heating, and where possible, buying recycled, recyclable, compostable products and ecolabelled cleaning products;
- We recognise the environmental impact of our office supplies procurement and maintain a record of our suppliers actively monitoring purchasing alternatives; and

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- We constantly remind ourselves why we do what we do – from sharing what we learn about the marvels of nature, to examples of sustainable economic activity, to contributing to our local environment<sup>1</sup>
  - Commit to paying the London Living Wage to our interns and communicate our environmental and social objectives to our clients and customers, including through sharing this policy.

These objectives influence our quality management system. We are committed to ensuring that the way we work is sustainable, just as our work helps our clients in achieving their sustainability objectives.

## 2.2 Environmental legislation

We are aware of – and compliant with – the relevant current environmental legislation in the UK:

- The Waste (England and Wales) Regulations 2011 - The Waste (England and Wales) (Amendment) Regulations 2014
- The Hazardous Waste (England and Wales) Regulations 2005 - The Hazardous Waste (England and Wales) (Amendment) Regulations 2016
- Environmental Protection (Duty of Care) Regulations 1991
- The Environment Act 1995 – The Environment Act 2021 Regulations
- The Control of Pollution (Amendment) Act 1989
- The Controlled Waste Regulations 1992 - The Controlled Waste (England and Wales) Regulations 2012
- The Environmental Protection Act 1990
- Waste Electric and Electronic Equipment (WEEE) Regulations - The Waste Electrical and Electronic Equipment (Amendment) (No. 2) Regulations 2018

## 2.3 Monitoring

We use our Environment Report to define and implement an emissions reduction pathway in line with science-based targets to deliver the Paris Agreement.

We are committed to Net Zero by minimizing our carbon equivalent emissions (from energy use, transport and other, as relevant) and offsetting what we cannot avoid. In our 2020-21 report, we used the GHG Protocol and BEIS conversion factors to identify Scope 1, 2 and 3 emissions. Scope 1 is not applicable to our activities. Our Scope 2 emissions are zero as we purchase electricity from a 100% renewable provider. Scope 3 emissions include capital expenditure, utilities, consumables, business travel and commuting to work. Due to the pandemic and adoption of hybrid working, we also included the use of energy by staff when they work at home.

<sup>1</sup> We aim, whenever possible, to spend our team away- days on environmental projects, for example: in 2006 we built release pens for a vole conservation project in Oxfordshire; in 2008 we worked on the building of a house out of discarded newspapers as part of an environment-art project; in 2013 we volunteered at Adelaide Local Nature Reserve to build new and repair existing walking paths); in 2019 we volunteered for a day to carry out maintenance work on a pond and fences at Waterlow Park in Camden. Post-Covid restrictions in 2022, we volunteered for a day of hedgerow conservation, invasive species control and fence maintenance on Hampstead Heath for Heath Hands. In 2023 we carried out maintenance works at Hoxton Square, a public garden close to our office.

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Our offsets have been purchased from World Land Trust (<https://www.worldlandtrust.org/>) through a biodiversity friendly voluntary offset programme since 2007. Our latest Carbon Offset Certificate can be found on our website: <https://www.eftec.co.uk/core-values>

Key areas documented in our Environment Report, and subject to management measures to void and minimise impacts, are:

- Energy water and material use.
- Office waste and recycling.
- Business and commuting travel.

Going forward, we will continue to minimise our GHG emissions by maintaining our renewable energy purchase, minimising our capital purchases and use, minimising travel, choosing minimal impact products, and encouraging our suppliers to move to less polluting production and service provision. We believe these actions are appropriate for a service sector SME like eftec.

## 2.4 Training and awareness

As an environmental economics consultancy, both our technical and support staff choose to work here for their work to have a positive impact on nature and people living today and future generations. In addition, most staff have somewhat environmentally focused Masters degrees, and demonstrate high levels of awareness. This policy is communicated to our staff as part of their induction process, and we sustain ongoing awareness through dissemination of our annual policy reviews, and internal newsletters about developments in relevant fields. Any amendments to the policy or to associated procedures are disseminated to staff through our weekly workplan meetings and/or regular team strategy meetings. We are committed to:

- Ensuring that all employees and associates are aware of our sustainability policy and our commitment to continual improvement;
- Providing training, development and progression opportunities to all staff; and
- Regularly reviewing all our practices and procedures to ensure not only compliance but improvement.

## 3. Honest and ethical behaviour

eftec is committed to conducting all aspects of our business in an honest, open and ethical manner. Our clients, suppliers and other stakeholders are entitled to expect us to comply fully with all our legal responsibilities, as well as with our core business values and ethical principles.

eftec seeks to promote a culture of honesty and integrity in all its dealings and will not tolerate acts of fraud, dishonesty, bribery, corruption, or theft of assets or data from the business. It is also committed to ensuring that neither eftec's integrity nor reputation is put at risk. We achieve this through the effective use of our quality management systems and processes to help us identify and manage:

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## 3.1 Conflicts of interest

Potential conflicts of interest are evaluated at tender stage and/or prior to signing project contracts, and are reported to eftec's Chief Executive Officer (CEO), Ece Ozdemiroglu. eftec also expects to be advised by clients and subcontractors of any relationships which may potentially - or do - give rise to a conflict of interest.

eftec is committed to being open and transparent about any conflicts of interest. We maintain a register to record details of any such interests, as well as senior teams' external engagements and implications are considered by our senior management team.

## 3.2 Fraud and dishonesty

Acts of fraud, dishonesty, bribery, corruption, theft of assets or improper disclosure of confidential information will not be tolerated, whether committed by employees, suppliers, third party contractors or partners working for and on behalf of eftec. eftec will, therefore, treat these issues very seriously and expects all occurrences to be reported immediately.

All employees are reminded that it is a criminal offence to offer, promise or give any financial or other advantage to any other person (including business partners, suppliers, officials, or regulatory bodies), if the intention is to induce the other party to act improperly in their business or public function. In addition, any contravention of the Bribery Act 2010 by an individual associated with eftec may expose eftec to criminal liability.

## 3.3 Whistleblowing

eftec is committed to maintaining the highest standards of honesty, openness, and accountability. Where an employee has a genuine concern or awareness of an issue of malpractice or dishonesty, there is an expectation from eftec that the employee will raise the issue with eftec's Chief Executive Officer, Ece Ozdemiroglu - or another Director. Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure. Failure to do so could lead the employee to be viewed as negligent or complicit in any inappropriate acts and may lead to disciplinary action.

eftec has an expectation that its suppliers, third party contractors and partners have a similar policy and procedure within their own organisation.

Whistleblowing in the public's interest is protected by law. More details can be found here: [Whistleblowing for employees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/whistleblowing-for-employees). Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest. These should be reported under eftec's grievance policy.

## 3.4 Anti-bribery

### 3.4.1 What constitutes bribery?

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

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- Intention of inducing or rewarding improper performance of a function or activity, including facilitation payments (to induce officials to perform routine functions that they are otherwise obligated to perform); or
  - Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or person/company associated with / acting for / on behalf of ettec offers, promises, gives, requests, receives or agrees to receive bribes; or
- An employee or person/company associated with / acting for / on behalf of ettec offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence).

### 3.4.2 What is prohibited?

ettec prohibits employees or associated persons from offering, promising, giving, soliciting, or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or person/company associated with ettec is situated in the UK or overseas.

### 3.4.3 Procedures and risk assessment

As a small or medium sized business, which faces minimal bribery risks, we have determined that we require relatively minimal procedures to mitigate those risks. We will apply the *following six principles* when deciding what, if anything, we need to do differently to ensure we are compliant with anti-bribery legislation:

1. Proportionality: the action(s) we take should be proportionate to the risks we face and to the size of our business.
2. Top level commitment: senior management should be able to show that it has been active in making sure that our staff and the key people who do business with us understand that we do not tolerate bribery.
3. Risk assessment: bribery risks should be considered within Risk Assessment processes we routinely undertake in relation to new markets, clients, and projects, particularly if we are entering into new business arrangements and new markets overseas.
4. Due diligence: knowing exactly who we are dealing with can help to protect our organisation from engaging with people who might not be trustworthy. We may therefore ask questions and carry out checks before engaging others to represent us in business dealings. **PROCEDURE: carrying out more rigorous Due Diligence checks on those suppliers that we consider higher risk.**
5. Communication: communicating our policies and procedures to staff and to others who will perform services for us enhances awareness and helps to deter bribery by making clear the basis on which our organisation does business. **PROCEDURE: circulating our policies to staff and associates.**

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6. Monitoring and Review: The risks we face, and the effectiveness of our procedures may change over time. We will review the anti-bribery steps we have taken so that we keep pace with any changes. **PROCEDURE: reviewing our policy and risk assessment at least annually<sup>2</sup>.**

eftec has determined that there is low risk of bribery being committed by or on behalf of our organisation. The procedures that we have adopted (set out in points 1-6 above) are proportionate to that risk.

As well as this, eftec has other proportionate procedures in place through existing controls over company expenditure, accounting and commercial contracts when working in the UK and overseas.

### 3.5 Hospitality, promotional or other business expenditure

The Government does not intend that genuine hospitality or similar business expenditure that is reasonable and proportionate be caught by the Act, so eftec may provide bona fide hospitality, promotional or other business expenditure. Examples are providing tickets to sporting events, taking clients to dinner, offering gifts to clients as a reflection of good relations, or pay for reasonable travel expenses in order to demonstrate our goods or services to clients if that is reasonable and proportionate for our business.

**Procedures:** Expenses are coded, reconciled and authorised by a senior member of staff monthly.

For personal expenses, employees should submit requests to Senior Management for proposed hospitality and promotional expenditure in advance of proposed dates. eftec maintains a Gifts and Hospitality register where we record:

- The objective of the proposed client entertainment or expenditure;
- The identity of those who will be attending;
- The organisation that they represent;
- Details and rationale of the proposed activity, and
- Records and receipts must be provided.

### 3.6 Modern slavery

From 29 October 2015, the Modern Slavery Act 2015 requires commercial organisations to make a public statement as to the actions they have taken to detect and deal with forced labour and trafficking in their supply chains – the Transparency in Supply Chains obligation. The guidance ([available here](#)) provides clarity on some areas of uncertainty. It emphasises the intention behind the Act that an organisation will commit time and resources to understanding and working to combat the issue of slavery in its supply chain.

The guidance points out that there is a “spectrum of abuse” and it is difficult to be certain at what point “poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment”.

<sup>2</sup> Whilst conducting the November 2023 annual review, government legislation was checked. We note that no changes have been made to the government guidance since last year.



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### 3.6.1 Who is most at risk?

Intricate global chains of contracting and sub-contracting make it easy for a business to lose sight of the conditions under which their goods are produced. Sectors where there is a predominance of low paid unskilled labour and those which are dependent upon global supply chains will be particularly vulnerable. **eftec does not fall into this category.**

### 3.6.2 Who is required to comply?

The Transparency in Supply Chains obligation applies to any commercial organisation (a corporate entity or partnership) in any sector that supplies goods or services, carries on a business or part of a business in the UK, and has a total annual turnover of £36 million or more. **eftec's turnover is under the threshold**, but we have prepared this policy statement to confirm our commitment to anti-slavery and to provide assurance to our clients that we do not conduct or condone modern slavery.

### 3.6.3 eftec's approach to anti-slavery

We set out below our preventative procedures and the reasons why we consider ourselves low-risk:

- We consider the nature of eftec's activities and business models (as described in our most recent Business Plan) as low risk.
- We have reviewed our existing corporate responsibility policies and consider that they reflect our commitment to anti-slavery;
- We ensure that our employees are in receipt of no less than the applicable minimum wage. We have robust immigration checks in place;
- We have no employees in high-risk countries;
- We have reviewed national and international supply chains in order to identify risk areas. We do not believe that additional due diligence is required;
- Where appropriate, we seek assurances from our suppliers that they comply with the Act; and
- We ensure that this policy is available to our staff and stakeholders.

## 4. Our community

We support non-governmental organisations and social and environmental causes as much as we can – by donations directly or through supporting our team members' fundraising activities, by purchasing our carbon credit from a source that also provides biodiversity conservation, by taking part in activities organised by charities (e.g. the theatre plays staged by Rising Tides), and providing pro bono or discounted services to NGOs.

A significant contribution we make to our environmental economics community is to set up and manage the [UK Network of Environmental Economics](#). It is a platform for those who produce and use environmental economics research evidence. In recent years, we have also brought in others to help the community with communication and using the arts for example.

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## 5. Environmental, Social and Governance (“ESG”) policy commitment and objectives

Growing concerns about social and environmental issues in society as well as more attention being given to corporate governance issues and increasing legal obligations on companies, has led to greater interest in how companies are governed, overseen and should operate to ensure that they carry on their business and behave in a responsible way. Specifically, companies are increasingly expected to consider purpose as well as profit, and the future of our planet and its peoples. All these various issues are collectively referred to as ESG.

ESG issues include, amongst other things, climate change and greenhouse gas emissions; energy efficiency and resource depletion; emissions to air, water and land pollution and waste; health and safety considerations; diversity, inclusion and equal pay; stakeholder and community engagement; bribery and corruption; conflicts of interest and anti-money laundering. We already have policies and procedures in place to cover these areas where they are relevant to eftec, as described in Sections 2 and 3. However, in addition, the directors have decided to develop a robust and transparent ESG strategy to enhance all areas of our business in line with ESG issues.

Our strategy is commensurate with our size and sector focus, setting out the type of organisation that we aspire to be. So far as it is applicable and reasonably practicable, our operations will be carried out with a commitment to:

- protecting and enhancing the environment by minimising negative impact and maximising positive impact on the environment – as set out in our [Environment Report](#);
- ensuring appropriate conduct towards, positive impact on and good relationships with employees, customers/clients, suppliers and the community in which it operates – as set out in Section 3; and
- conducting our business with integrity and high standards of business ethics, through appropriate structures, systems, processes and procedures. This is the responsibility of project directors, who oversee its implementation across all business activities, including the whole project cycle. Key areas include:
  - Screening of clients and contract objectives to ensure they are ethical – where any doubts exist they are clearly written down and communicated amongst directors.
  - Ensuring project outputs are clearly interpreted for clients and will encourage sustainable decision-making, including sound environmental management.

In fulfilling our ESG commitment, we seek to:

- comply with all applicable local and national laws, rules, regulations and other measures having the force of law that are relevant to any aspects of our ESG commitment; and
- where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of its ESG commitment which are higher than the standards imposed by law.

All eftec employees must adhere to the principles and objectives of this ESG statement and wider CSR policies. These documents are made available to employees to ensure their awareness.

eftec expects our suppliers and contractors to adopt policies and standards consistent with those set out in this ESG section.

Through the policies described in Sections 1 – 3 we maintain a governance process to manage our environmental and social impacts.

We do not have impacts on the environmental that require time-critical monitoring or reactive management. Therefore, adherence to appropriate policies and processes is a proportionate and suitable process to manage our main social and environmental impacts.

eftec’s board and senior management meetings ensure that eftec complies with all applicable local and national laws and regulations, relevant standards and codes of practice relating both generally and in particular to transparency and corporate governance. Our senior management meeting minutes and ISO9001 certified management processes provide a clear and effective governance for ESG, promoting the use of best practice on corporate governance when relevant and possible, setting goals and establishing accountability through reports to its board.

## 6. Dissemination and implementation of policy


The Board of Directors is responsible for the review, dissemination and implementation of this policy to:

- Everyone in the company, initially via the induction process, but also in respect of updating staff as and when there are changes to the policy;
- Clients via their due diligence processes;
- Our sub-consultants, associates and suppliers - where applicable.

The CSR Policy forms part of **mandatory awareness training** for all eftec employees.

We seek to ensure that our sub-consultants also comply with the rules of this policy – and applicable legislation - as it applies to their work and the services provided to us and the Client. CSR / ESG policies are a factor in us choosing to accept / decline invitations to join consortia by different lead companies.

This policy is reviewed at least annually by the Board. It is deemed effective as of the date of issue and has been approved & authorised by:

<b>Name:</b>	Ece Ozdemiroglu
<b>Position:</b>	CEO
<b>Date:</b>	November 2023
<b>Signature:</b>	

Next Review Date: **November 2024**