CORPORATE AND SOCIAL RESPONSIBILITY POLICY

Policy brief & purpose

Q3 Facilities Holdings Limited (Q3) (including all subsidiary companies such as Q3 Services Group Limited, Q3 Security Limited, Q3 Grounds Services Limited, Q3 Technical Services Limited and Q3 Services (CI) Limited) is committed to operating responsibly, ethically and sustainably. This policy sets the principles that guide how we consider our impact on people, communities, the environment and the long-term resilience of our business. It turns corporate social responsibility into practical expectations for decision-making, service delivery and our supply chain.

Scope

This policy applies to all Q3 directors, employees, workers, agency staff and contractors. We also expect suppliers, subcontractors, consultants and other business partners to support equivalent standards when working for or representing Q3. Local legal requirements apply where Q3 operates outside Great Britain; where standards differ, the higher lawful standard should be followed wherever practicable.

Our Principles

- Comply with applicable legal, regulatory, contractual and client requirements.
- Act with integrity, fairness, transparency and respect for human rights.
- Prevent harm where reasonably practicable and address adverse impacts promptly.
- Consider environmental and social value alongside quality, cost, safety and operational delivery.
- Set proportionate objectives, use credible evidence and report progress honestly.
- Listen to employees, clients, suppliers and communities, and use feedback to improve.

Q-Aware: environment and sustainability

Q-Aware governs how we reduce environmental impact while maintaining safe, effective and commercially responsible facilities services. We will:

- comply with applicable environmental law and Q3 environmental, energy, waste and fleet arrangements;
- measure and, where practicable, reduce energy use, greenhouse-gas emissions, water consumption, waste and pollution;
- apply the waste hierarchy by preventing waste first, then reusing, recycling or recovering materials before disposal, and comply with applicable waste-management and recycling requirements, including relevant workplace waste-separation requirements. Waste under Q3's control will be stored, segregated, transferred and disposed of appropriately using authorised arrangements;
- select lower-impact products, chemicals, equipment and methods where safe, effective, affordable and contractually suitable;
- reduce unnecessary travel and support lower-emission travel and fleet choices where operationally viable;
- protect biodiversity and prevent environmental damage at sites under our control or influence;
- work with clients and suppliers to identify practical improvements and avoid unsupported environmental claims.

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Q-Fair: ethical and responsible business

Q-Fair reflects our commitment to lawful, honest and responsible business conduct. We will:

- not tolerate bribery, corruption, fraud, facilitation payments, facilitation of tax evasion, conflicts of interest or anti-competitive conduct, and maintain proportionate controls designed to prevent fraud and other economic crime by persons acting for or on behalf of Q3;
- respect internationally recognised human rights and take proportionate steps to identify and manage risks of modern slavery, forced labour, child labour and exploitation;
- procure fairly and transparently, considering value, quality, risk, sustainability, social value and the capability of small and local businesses;
- pay suppliers in line with agreed terms and raise concerns early where performance or payment may be affected;
- protect personal data, confidential information and Q3 assets, and use technology, including artificial intelligence, responsibly;
- conduct proportionate due diligence on higher-risk suppliers and require corrective action where standards are not met;
- keep accurate records and make public statements that are evidence-based, balanced and capable of substantiation.

Q-Care: people and communities

Q-Care focuses on the wellbeing, development and fair treatment of our people and the communities connected to our work. We will:

- provide safe and healthy working environments and encourage everyone to report hazards, concerns and near misses;
- promote equality of opportunity, inclusion, dignity and respect, and take reasonable steps to prevent sexual harassment in the course of employment, alongside preventing discrimination, bullying, harassment, victimisation and retaliation. Q3 will assess relevant risks and take proportionate preventative action, including appropriate policies, communication, training, reporting arrangements and management intervention;
- use fair recruitment and employment practices, verify the right to work and support fair pay within our legal, contractual and commercial framework;
- invest in learning, apprenticeships, work experience, career development and employability opportunities where these provide meaningful benefit;
- support employee wellbeing, engagement and accessible ways to raise ideas or concerns;
- build community partnerships responding to evidenced local need and relevant to the contracts and places where we operate;
- provide volunteering, charitable support, sponsorship or in-kind assistance through transparent approval and appropriate due diligence.

Responsible supply chain

3 expects suppliers and subcontractors to act lawfully and consistently with this policy. Selection and monitoring will be proportionate to the value, location, service and risk of the arrangement. Depending on risk, Q3 may assess labour standards, right-to-work controls, wages, working time, health and safety, modern slavery, recruitment practices, environmental performance, anti-bribery, information security, data protection, business continuity, training, audits and improvement plans.

Serious or repeated non-compliance may lead to corrective action, closer monitoring, suspension or termination, subject to contract and law. Q3 will consider whether remediation for affected people or communities is appropriate before ending a relationship solely to remove risk from view.

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Where section 54 of the Modern Slavery Act 2015 applies to a Q3 entity, the relevant annual slavery and human trafficking statement will be prepared, approved and published in accordance with the statutory requirements and current Home Office guidance. This policy does not replace that statement.

Governance and responsibilities

Role	Responsibility
Board / Managing Director	Approve the policy, set the tone, oversee material risks and review significant performance information.
Policy owner / ESG lead	Maintain the framework, coordinate objectives and reporting, advise the business and support annual review.
Directors and managers	Embed the policy in decisions, contracts and local plans; allocate responsibilities; escalate material issues.
Procurement and contract teams	Apply proportionate supplier due diligence, include relevant requirements and monitor delivery.
All colleagues	Follow Q3 policies, use resources responsibly, complete training and speak up about concerns or opportunities.
Suppliers and partners	Meet applicable contractual standards, provide accurate information and notify Q3 of material concerns.

Objectives, measurement and reporting

Q3 will set proportionate objectives based on material risks, client commitments and business priorities. Measures may include energy and fuel use, emissions, waste, water, responsible procurement, supplier assurance, training, employee participation, community investment and employability outcomes. Targets must have a clear baseline, owner, timescale and evidence source.

- Performance will be reviewed through appropriate management and governance meetings.
- Material incidents missed targets and data limitations will be reported openly with corrective actions.
- External claims and tender responses must be supported by current, verifiable evidence and approved through the relevant Q3 process.
- Personal data used for monitoring will be minimised and handled in line with Q3 data-protection requirements.

Speaking up and non-retaliation

Anyone working for or with Q3 should raise concerns about suspected legal breaches, unsafe or unethical conduct, environmental harm, modern slavery, discrimination, misuse of charitable funds, inaccurate reporting or retaliation. Concerns may be raised with a line manager, People Services, the relevant director, or through Q3's whistleblowing arrangements. Q3 will take concerns seriously, handle them as confidentially as practicable and will not tolerate retaliation against a person who raises a genuine concern in good faith.

Related requirements

This policy should be read alongside current Q3 policies and procedures on environmental management, energy, health and safety, equality and inclusion, prevention of bullying and harassment, safeguarding, ethical business, anti-bribery, fraud prevention, modern slavery, whistleblowing, procurement, data protection, information security and artificial intelligence. Where a client contract sets a higher lawful standard, that requirement must also be followed.

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Legal and good-practice framework

This policy supports Q3's compliance framework, including, where applicable, the Equality Act 2010 and the employer duty to take reasonable steps to prevent sexual harassment; Health and Safety at Work etc. Act 1974; Modern Slavery Act 2015; Bribery Act 2010; Criminal Finances Act 2017; Data Protection Act 2018 and UK GDPR; Environment Act 2021 and applicable waste and environmental legislation; Climate Change Act 2008; Economic Crime and Corporate Transparency Act 2023; and Procurement Act 2023. This list is not exhaustive. Q3 will monitor relevant legal, regulatory and contractual developments and update its controls when necessary.

Review and document control

The policy owner will review this policy at least annually and sooner following a material legal change, serious incident, significant business change, audit finding or evidence that the policy is not operating effectively. Controlled copies will be maintained in Q3's approved document repository. Printed or locally saved copies may become out of date.

Stuart Bellew
Chief Operating Officer
1 April 2026

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