



## 1. Introduction & Strategy

ICE operates in a world facing complex challenges, from climate change and resource scarcity to social inequality and evolving stakeholder expectations. As a business, we recognise our responsibility and our opportunity to contribute positively to these challenges while ensuring sustainable growth.

Our commitment to Corporate Social Responsibility (CSR) is driven by:

- The expectation that businesses act ethically and transparently
- The need to future-proof our operations against environmental and social risks
- The belief that long-term success is inseparable from the well-being of people and the planet

### How We Deliver on Our Commitment

Our CSR strategy is led from the top, with a clear and active commitment from our CEO and leadership team. This ensures accountability, alignment with business objectives, and integration across all functions.

#### Leadership Commitment

Our CEO and leadership team set the tone by embedding sustainability into corporate governance and strategic priorities. Through regular oversight, clear targets, and transparent reporting, leadership ensures that CSR remains a core business focus rather than a standalone initiative.

#### Values and Sustainability Vision

ICE's company values mainly '**Sustainability Focused**' guide every decision we make. We are committed to operating with integrity, fostering inclusive growth, and minimizing our environmental impact. Our sustainability vision is to build a resilient business that delivers positive social and environmental outcomes alongside financial performance.

#### Key Priorities and Long-Term Goals

We have identified the areas where we can have the greatest impact and aligned our resources accordingly. Our priorities typically focus on:

- Reducing environmental footprint (e.g. emissions, waste, resource use)
- Supporting our people and communities
- Encouraging ethical business practices across our value chain

These priorities are supported by measurable, long-term goals that drive continuous improvement and accountability.

#### Alignment with Global Frameworks

To ensure our efforts are meaningful and globally relevant, we align our strategy with recognised frameworks such as the United Nations Sustainable Development Goals (SDGs). This alignment helps us:

- Focus on areas where we can make the most significant contribution
- Collaborate more effectively with partners and stakeholders



## 2. Governance & Ethics Approach

### Corporate Governance Structure

Our governance model ensures clear oversight and balanced decision-making. The leadership team holds ultimate responsibility for guiding strategy, overseeing risk and is accountable for implementing decisions with an environmental, social, and ethical consideration. Defined roles and reporting lines that reinforce responsibility across all business units and can be seen through ICE's Organisation Chart. [ICE Org Chart](#)

### Ethics Policies and Culture

We foster a culture where ethical behaviour is expected and supported. Our Code of Conduct sets out clear standards for integrity, fairness, and professionalism, and is reinforced through regular training and communication. We maintain strict anti-corruption and anti-bribery policies, with zero tolerance for misconduct. To support transparency, we provide confidential whistleblowing channels that allow employees and stakeholders to raise concerns safely and without fear of retaliation. All reports are taken seriously, investigated independently, and addressed with appropriate action.

### Compliance with Laws and Regulations

We are committed to operating in full compliance with all applicable laws and regulations through ongoing monitoring, internal reviews, and periodic audits to ensure consistent adherence.

To strengthen this approach, we maintain a comprehensive legal register that identifies and tracks relevant legal, regulatory, and other requirements. This register is regularly reviewed and updated to reflect changes in legislation and industry standards, ensuring that our operations remain aligned with current obligations. The legal register also plays a key role in supporting our adherence to internationally recognised management system standards, including ISO 9001 (Quality Management), ISO 14001 (Environmental Management), and ISO 45001 (Occupational Health and Safety).

## 3. Environmental Impact

### Greenhouse Gas Emissions (Scopes 1, 2, and 3)

We measure and manage our greenhouse gas emissions across all relevant scopes. This includes direct emissions from our operations (Scope 1), indirect emissions from purchased energy (Scope 2), and value chain emissions (Scope 3). By establishing a comprehensive emissions baseline, we are able to set reduction targets, track progress, and identify opportunities to decarbonise our operations and supply chain.

### Energy Consumption and Renewable Energy Use

Improving energy efficiency and reducing carbon intensity are key priorities in our environmental strategy and are highlighted in our Carbon Reduction Plan [Carbon-Reduction-Plan-2026.pdf](#). We report energy consumption across



all our facilities and implement efficiency measures such as upgraded systems, optimised operations, and ongoing performance improvements, with assistance from our carbon reporting partner Neutral Carbon Zone.

To significantly reduce our operational carbon footprint, we have procured all our premises are supplied through either renewable energy tariffs or verified carbon neutral tariffs. This approach supports a transition away from fossil fuel dependence and contributes to lowering overall greenhouse gas emissions associated with our operations.

### Waste Management and Circular Economy Efforts

We are committed to minimising waste generation and maximising resource efficiency across our operations. Our approach prioritises waste reduction at source, increased reuse and recycling, and the diversion of waste away from landfill wherever possible. We also continue to explore circular economy principles to extend material lifecycles and reduce overall environmental impact.

To support transparency and continuous improvement, we produce an annual waste report that reviews our waste streams, volumes, and recovery rates. This enables us to identify trends, measure performance, and implement targeted improvements in waste management practices.

In addition, we comply with Packaging Extended Producer Responsibility (EPR) requirements by reporting our packaging data to the Environment Agency. This reporting is managed in partnership with our specialist compliance provider, Beyondly, ensuring accurate data submission and adherence to regulatory obligations.

### Sustainable Logistics & Transport

Transport remains one of the most significant contributors to our environmental impact within our operations, and we continue to prioritise initiatives that reduce emissions and improve fleet performance. Our transition to a cleaner fleet has accelerated, with electric vehicles now representing 38% of our total fleet, supported by the recent addition of 10 new Kia PV-5 electric vans. This shift directly reduces Scope 1 emissions and demonstrates our commitment to long-term decarbonisation.

To complement the move toward low-emission vehicles, we use advanced telematics systems across our fleet to monitor and discourage unwanted driver behaviours such as harsh braking, excessive acceleration and any speeding. These insights help us reduce fuel consumption, extend vehicle life, and promote safer, more environmentally responsible driving practices. Together, these measures ensure that our logistics operations contribute meaningfully to our overall sustainability goals.

### Environmental Innovation & Technology

Innovation plays a central role in reducing environmental impact not only within our own operations but also through the products and technologies we provide to customers. One of our core visions is '**Fanatical About Innovation**'. Our equipment portfolio increasingly incorporates lithium-ion battery technology, offering longer run times, faster charging, and reduced reliance on fossil-fuel-powered alternatives. These improvements support cleaner, quieter, and more energy-efficient operation.



Many of our machines now feature adaptive and selective cleaning modes, including spot-cleaning functions that minimise unnecessary energy and water use. We also promote equipment with water-recycling capabilities, with some models achieving up to 70% water re-usage, significantly reducing consumption during operation. In addition, we actively encourage chemical-free cleaning solutions, helping customers reduce chemical usage, improve indoor air quality, and lower their overall environmental footprint.

## 4. Social Responsibility Approach

### Employee Wellbeing, Diversity & Inclusion

ICE prioritise a positive, supportive, and inclusive working environment where employees feel valued and respected. Our wellbeing initiatives focus on mental, physical, and financial health, supported by open communication and access to wellbeing resources. We actively promote diversity and inclusion, ensuring equal opportunities in recruitment, progression, and leadership. Our culture encourages employees to bring their full selves to work, fostering collaboration, innovation, and a sense of belonging across all teams.

### Labour Practices & Human Rights

We uphold high standards of ethical conduct and are committed to protecting human rights across our operations and actively encourage this through our supply chain. Our labour practices align with recognised international principles, ensuring fair treatment, non-discrimination, and zero tolerance for forced or child labour. We maintain transparent employment policies, and fair working conditions.

### Health & Safety Metrics

We maintain a rigorous and proactive approach to health and safety, supported by a structured management system and independently verified accreditations. Our framework is built around prevention, continuous improvement, and full compliance with recognised industry standards. As an organisation, we are ISO 45001 certified, demonstrating that our occupational health and safety management system meets the highest international benchmark for risk control, worker protection, and governance.

Our commitment is further reinforced through external accreditations, including SafeContractor and Constructionline Gold membership, which validate our robust safety practices, contractor management processes, and adherence to industry best practice. We also hold an EcoVadis Bronze rating, reflecting our broader commitment to responsible business conduct, including health and safety performance within our sustainability strategy.

### Training & Development

**'Investing in our people'** is one of our core values and a defining part of who we are as an organisation. We recognise that our greatest strength lies not only in the products and services we deliver, but in the diverse, talented, and passionate individuals who make up Team ICE. Our commitment to training and development ensures that every employee has the opportunity to grow, contribute, and build a long-term career with us.

We provide structured learning pathways that include role-specific technical training, leadership development, and ongoing professional skills programmes. New employees benefit from comprehensive onboarding and on-the-job



learning, while experienced team members have access to continuous development opportunities that support progression and deepen expertise. By embedding development into our culture and aligning it with our values, we create an environment where individuals feel supported, included, and able to reach their full potential. This investment strengthens our organisational capability, enhances service quality, and ensures we continue to deliver excellence for our customers and communities.

## 5. Supply Chain Responsibility

### Supplier Standards & Audits

We have recently strengthened our supplier standards that outline our expectations on quality, safety, environmental performance, and ethical conduct. Starting with our top 10 suppliers this will cover roughly 80% of all our supplied goods and services. We conduct Annual audits both remotely verify compliance, identify improvement opportunities, and ensure that corrective actions are implemented where required. All new suppliers are assessed against these standards during onboarding. Long-standing supplier relationships built on transparency and open communication help us maintain consistent quality and responsible practices throughout the supply chain.

### Modern Slavery Prevention

We have zero tolerance for modern slavery, forced labour, or human trafficking in any part of our supply chain. Our Modern Slavery Policy outlines the controls we have in place and including supplier declarations. Training for relevant employees ensures awareness of potential indicators of exploitation enabling early identification.

### Environmental & Social Risks in the Supply Chain

ICE understand the opportunity it has to develop Environmental & Social Risks in the Supply Chain management. That being said we have limited experience in the area and are trying to mature the data we have. We plan to gain support from our carbon reporting partner Neutral Carbon Zone. They have the knowhow and experience of supply chain engagement. After initial responses we can then look to engage specific suppliers from a risk-based approach to supports our broader sustainability commitments to help align with our stakeholder expectations for transparency and accountability.

### Ethical Sourcing

We understand the importance and impact around ethical sourcing of products, materials, and services in a way that respects people, communities, and the environment. This is something we are building into our supplier requirements to form a more robust supply chain as many of our suppliers are from China. We will be encouraging fair labour practices, responsible material sourcing, and compliance with all relevant regulations. Eventually we would like to prioritise suppliers who demonstrate strong environmental and social performance, including those with recognised certifications or sustainability programmes.

## 6. Products & Innovation

### Sustainable Product Design

Ice is **'Fanatical About Innovation'** it's one of our companies core visions We encourage manufacturers to design and provide products with sustainability in mind, this drive comes from our customers as the journey to net zero for all



companies drives each supply chain. This includes considering material selection, durability, energy efficiency, packaging reduction, and recyclability throughout the design process. Where possible, we seek opportunities with various manufacturers to reduce resource consumption and incorporate more sustainable materials and processes into product development.

## Lifecycle Impacts

We recognise that the environmental and social impacts of products extend beyond supply. We are working on strengthening our approach around the full product lifecycle from sourcing and production through to distribution, use, and disposal. By assessing lifecycle impacts, we can identify opportunities to reduce emissions, waste, and resource use while improving overall product sustainability and performance.

## Research & Development in Sustainability

Innovation is central to our sustainability strategy its literally one of the companies values 'Sustainability Focused'. Through ongoing research and development and being market leaders, we invest in new technologies, processes, and solutions that improve efficiency, reduce environmental impact, and respond to evolving customer and regulatory expectations. Our R&D efforts support continuous improvement and help ensure that sustainability remains a key driver of future growth and resilience.

## Customer Health, Safety, and Data Privacy

Protecting our customers is a fundamental responsibility. We are committed to ensuring that our products and services meet all relevant health and safety requirements and are designed with user wellbeing in mind.

In addition, we maintain robust data privacy and cybersecurity practices to safeguard customer information and ensure compliance with applicable data protection regulations. Through clear policies, secure systems, and ongoing monitoring, we work to maintain customer trust and confidence. ICE hold Cyber Essentials PLUS. Unlike the standard self-assessed Cyber Essentials accreditation, Cyber Essentials Plus involves an independent technical audit and device testing process carried out by an external certification body. The certification demonstrates that key cyber security controls are operating effectively across the organisation and provides additional assurance to customers, suppliers, and partners that ICE takes cyber security seriously. Achieving this standard reflects the ongoing work being undertaken to strengthen the company's systems, processes, and overall security position.

## 7. Stakeholder Engagement

### Key Stakeholder Groups

We recognise that strong, transparent relationships with our stakeholders are essential to responsible and sustainable business performance. Our key stakeholder groups include employees, customers, suppliers, industry partners, regulators, and the communities in which we operate. Understanding their needs, expectations, and concerns enables us to make informed decisions, manage risks effectively, and create long-term value.



To ensure this engagement is structured and consistently applied, we actively manage stakeholder expectations through our ISO-aligned Needs & Expectations of Interested Parties Procedure. This formal process helps us identify relevant stakeholders, assess their priorities, and integrate their requirements into our management systems, strategic planning, and operational decision-making. It ensures that stakeholder considerations are not ad-hoc but embedded into how we run the business.

We also use our PESTLE Analysis to monitor external factors political, economic, social, technological, legal, and environmental that may influence stakeholder expectations or impact our operations. This analysis provides a forward-looking view of emerging risks and opportunities, enabling us to adapt our approach and maintain alignment with stakeholder needs in a changing landscape.

Together, these structured processes ensure that our stakeholder engagement is proactive, evidence-based, and fully integrated into our governance framework. They support transparent communication, responsible decision-making, and continuous improvement across all areas of our Corporate Social Responsibility commitments. We also engage with suppliers, regulators, industry bodies, and other relevant stakeholders where appropriate.

### Engagement Methods

We use a variety of engagement methods to encourage open communication and gather meaningful feedback. These include:

- Employee surveys, meetings, and training sessions
- Customer feedback channels and satisfaction surveys
- Investor briefings and performance reporting at regular intervals mainly quarterly business reviews
- Collaboration with industry groups, suppliers, and external organisations
- Community engagement activities and partnerships

These engagement activities help us better understand stakeholder expectations, identify emerging issues, and strengthen collaboration.

## 8. Performance Metrics & Targets

### KPIs with year-on-year comparisons

As we continue to strengthen our ESG performance, our priority is to mature the quality and consistency of our reporting. We are focused on building a more accurate and reliable baseline that will allow us to set realistic, attainable, and evidence-based KPIs for both carbon reduction and wider ESG enhancements. While year-on-year comparisons remain important, our current emphasis is on improving data accuracy, refining measurement methods, and ensuring that future performance indicators are grounded in robust, credible information. This approach ensures that our long-term targets are meaningful, achievable, and aligned with stakeholder expectations.



## Progress against targets

We track our performance against the milestones set out in our Carbon Reduction Plan, using year-on-year comparisons to show how effectively we are reducing emissions across Scopes 1, 2, and key Scope 3 categories. Progress is driven by actions such as expanding our electric vehicle fleet, improving driver efficiency through telematics, and investing in low-carbon technologies.

Where we meet or exceed our carbon-reduction targets, we raise future ambition; where progress is slower, we adjust our plans and allocate resources to accelerate improvement. Our performance is benchmarked against industry standards and peers, ensuring our targets remain credible and aligned with best practice. Elements of our carbon data may also undergo external assurance, strengthening confidence in the accuracy and integrity of our reporting.

## Benchmarking against peers or standards

To strengthen the robustness of our reporting, we undertake benchmarking against peers and recognised standards, helping us understand our relative performance within the industry and identify best practice opportunities. This includes alignment with frameworks such as EcoVadis criteria, and relevant ISO management systems. Benchmarking ensures our approach remains competitive, credible, and responsive to evolving stakeholder expectations.

## 9. Future Outlook

### Identified Risks & Opportunities

Through structured assessments including our ISO-aligned processes and PESTLE analysis, we monitor the external landscape to identify emerging risks and opportunities. Key risks include regulatory changes, supply chain disruptions, and climate-related impacts. At the same time, opportunities are emerging in areas such as low-carbon technology, digital innovation, and more sustainable product design. Understanding these dynamics enables us to adapt early, strengthen resilience, and position the business for long-term success.

### Upcoming Goals & Commitments

ICE has developed goals designed to enhance our ESG performance and accelerate progress with our carbon reduction partner Carbon Neutral Zone. These include maturing our data collation and reporting, further reductions in carbon emissions through fleet electrification and operational efficiencies, continued investment in employee development, and deeper engagement with suppliers and manufacturers to strengthen ethical and environmental standards. Our future commitments are shaped by stakeholder expectations and aligned with recognised frameworks such as EcoVadis criteria.