

# CAPCO



## **ENVIRONMENTAL SUSTAINABILITY POLICY**

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GLOBAL

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**Provision for Exception:**

These provisions apply to all business units unless an exception is formally requested and approved. Exceptions should be requested through the Policy Exception Process and are subject to approval by Policy Owner and Executive Management.

Version	Date	Author	Comments
1.0	2018, September 5	Richard Gartside	<ul style="list-style-type: none"><li>Initial Issuance</li></ul>
1.1	2020, January 8	Richard Gartside	<ul style="list-style-type: none"><li>Rename Title to Sustainability only and correct throughout document;</li></ul>
1.2	2021, February 25	Richard Gartside	<ul style="list-style-type: none"><li>Moved Standard and Authority sections to beginning.</li><li>Updated Standards section with UN Global Compact paragraph</li><li>Updated Supplier section to include Supplier Code of Conduct</li></ul>
1.3	2022, March 25	Richard Gartside	<ul style="list-style-type: none"><li>Annual review</li><li>Reporting – replaced CIT with Company Intranet</li></ul>
1.4	2023, April 14	Richard Gartside	<ul style="list-style-type: none"><li>2 – update responsibility to submit annual sustainability report and UN Global Compact submission</li><li>3 – commit to annual carbon audit and reporting</li><li>6 – restructure flow; add responsibility of office/facility managers; added IT Sustainability</li></ul>
1.5	2024, March 18	Suzanne Madden	<ul style="list-style-type: none"><li>Section 3 – added reference to UN Global Compact.</li><li>Section 3.1 – updated sustainability targets.</li><li>Section 4.1 – added details of new leadership metrics.</li><li>Section 4.2 – added reference to new training.</li><li>Section 6.2 – added new details of real estate strategy.</li></ul>
1.6	2025, July 29	Suzanne Madden	<ul style="list-style-type: none"><li>Section 3.1 Sustainability Targets – updated near and long term targets</li><li>Section 4.1 – leadership annual assessment of contribution and performance</li></ul>
2.0	2026, February 18	Suzanne Madden	<ul style="list-style-type: none"><li>Retitled to Environmental Sustainability Policy</li></ul>

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## 1. Overview

This policy applies to all Capco staff and relates to the activities undertaken by Capco and the impact of these on our suppliers, clients, staff, and the communities in which we operate.

Climate change, corporate responsibility and sustainability present challenges and opportunities for Capco, our Partners and our people, our clients, and our stakeholders. The firm is committed to incorporating progressive sustainability practices into our business strategy, services, and operations as well as fostering awareness of and responsibility for the environment among our leaders, employees, clients, suppliers, and other interested parties within the context of our business and services.

Capco will incorporate sustainable practice and energy efficiency into the firm's facilities and all areas of business activity.

Capco will comply with all relevant sustainability legislation, standards, regulations, and good practice in the variety of locations in which we operate and deliver services.

This Policy applies to Capco global operations. This means all Capco leaders, staff, contractors, and suppliers.

## 2. Authority & Accountability

A Capco Environmental Sustainability Committee acts on behalf of the Capco Chief Operations Officer to set firm Sustainability strategy and priorities annually and regularly review and authorize plans at the Firm-wide level. The Committee also receives reports on the development and implementation of Regional and local office plans. It comprises the Chief Administration Officer, Risk Director and representatives from the Americas, Europe and APAC regions and constitutes the highest level of leadership and management for Sustainability activities in the firm.

The Sustainability Committee identifies owners of processes by which risks, opportunities and aspects of Capco's business activities that may have an impact on the environment and climate change are understood and managed in compliance with best practice, international requirements, our commitments and, where relevant, in compliance with country/regional legislation.

All members of the Committee are accountable for the implementation of this firm's Sustainability Strategy and priorities within their respective areas of responsibility.

On behalf of the Environmental Sustainability Committee, the Chief Administration Officer (policy owner), commits to:

- Ensure all relevant Partners and staff are aware of the Sustainability strategy and priorities and this Policy and, where appropriate, trained in the terms and application of this Policy and any changes to it.
- Ensure that any changes to the Policy or associated Processes are duly authorized by the Capco Policy Committee.
- Submit a regular, Sustainability Annual Report on the effectiveness of this Policy (inclusive of human rights and labor, health and wellbeing, Diversity, Equity and Inclusion, Corporate Social Responsibility, Sustainable Business and Governance and Ethics) The Annual report is reviewed by the Capco Leadership Team and distributed to our people, clients and suppliers via the company intranet and website.
- Submit an annual submission on progress on Sustainability to the UN Global Compact on behalf of the firm in line with our firm's commitment to the Compact.
- Ensure that clear and robust Processes and reporting are specified and maintained to enable Capco to achieve its strategic objectives, operate as a responsible business, respond positively to the environmental challenge and climate emergency, attain relevant standards and accreditation to demonstrate our commitment to staff, clients and suppliers and adopt sustainability best practice across our operations. The Sustainability Committee is supported by the Capco Sustainability

Network made up of representatives from all Capco offices and other staff seeking to make a positive contribution to our Sustainability agenda and priorities. The network has two objectives:

- To assist the Environmental Sustainability Committee in the implementation of our Sustainability Strategy and priorities and help in reporting our progress in relation to our formal to goals set out in the firm's Sustainability Scorecard.
- To take a lead on additional local Sustainability-related campaigns, events, activities, and training to enhance staff awareness and engagement in relation to environmental challenges and climate emergency.

## 3. Standards

Capco is committed to addressing the environmental challenges facing our planet and the climate emergency. As a member of the UN Global Compact since 2020, the firm will ensure that its business operations, services, and solutions are managed and delivered in a way to meet environmental, social and governance expectations in support of the Ten Principles of the Global Compact. Capco will follow all relevant legislation, regulation, and standards, as we embrace sustainable business growth and operations, recognizing our obligations to our people, clients, and the communities in which we operate.

### 3.1. Sustainability Targets

The firm is committed to being Net Zero by 2040 by focusing on our real estate strategy, operations, business travel and homeworking emissions. Capco conducts an annual audit of our carbon emissions with a reputable, independent firm to measure progress against these goals and to determine actions and near-term targets for annual year-on-year progress. We will through a staged approach until 2040 offset our residual emissions through independently measured and verified projects that not only cut carbon emissions but also support local communities and both restore and conserve biodiversity.

We have also adopted best practice in setting ambitious Science-Aligned Targets to ensure our actions are consistent by limiting global warming to 1.5°C, in line with the Paris Agreement:

- **By 2030 (from FY24 base year):**
  - Reduce Scope 1 emissions by 42% (from 511 tCO<sub>2</sub>e to 297 tCO<sub>2</sub>e)
  - Reduce Scope 2 emissions by 42% (from 1,395 tCO<sub>2</sub>e to 809 tCO<sub>2</sub>e)
  - Reduce Scope 3 emissions by 25% (from 6,443 tCO<sub>2</sub>e to 4,832 tCO<sub>2</sub>e), focusing on:
    - 60% of purchased goods and services/capital goods (via supplier engagement)
    - 90% of business travel and staff commuting

- **Net Zero by 2040:**

We are committed to reaching Net Zero emissions by 2040.

We believe in transparent reporting and continuous improvement to achieve our Sustainability targets and goals. Our GHG assessment follows the Greenhouse Gas Protocol and is independently reviewed and assessed. We are committed to refining our data, engaging stakeholders, and updating our targets as our business evolves.

To achieve these targets, we are implementing a comprehensive carbon management plan that will guide us through a step-by-step decarbonization pathway. This includes:

- Annual and public reporting of emissions and progress against targets
- Engaging suppliers to improve data quality and reduce emissions across our value chain
- Prioritizing reductions in business travel, commuting, and homeworking emissions
- Investing in renewable energy and efficiency improvements wherever possible across our global operations

Capco is committed to building a robust sustainability program and employing responsible measuring, monitoring, and management standards in all our business activities. Adequate resources are allocated for the effective direction and implementation of the firm's sustainability policies, practice, and standards. The firm undertakes full assessment of our annual sustainability performance and impact each year and presents this to our leaders and staff as an Annual Sustainability Report which sets out our achievements and future goals. The Report is posted each year on our intranet and external website.

## **4. Leadership and Employees**

Capco encourages sustainability awareness, responsibility, and accountability in the way we work and deliver our services and among all our people. We provide opportunities for individuals to learn about our environmental commitments and responsibilities. (This may include, but is not limited to, workshops, awareness training, sharing best practices across the firm and participation in external campaigns and CSR events).

### **4.1. Leadership**

To meet our Net Zero target by 2040, Regional leaders will be measured on various key sustainability metrics for their region, as part of their quarterly business reviews and annual assessment of contribution and performance. Metrics will be across environmental, social and governance measurements and include reference to our firm Net Zero targets.

### **4.2. Staff**

Capco will sponsor activities, develop programs and solutions that harness employee enthusiasm and capabilities and offer opportunities for staff to collaborate on our journey to improve the firm's contribution to sustainable business practice and environmental responsibility.

Employees will receive mandatory Sustainability training that will educate individuals on how they can engage and support Capco to achieve Net Zero by 2040.

## 5. Clients and Suppliers

Capco will engage with our clients and suppliers to consider the environmental impact of how we deliver our services and solutions and support them in addressing their own sustainability commitments and best practice.

Capco will encourage action by our clients and suppliers on environmental, social, governance and overall sustainability best practice. We will not work with clients or suppliers who show a willful neglect of the environment or who fail to demonstrate compliance with environmental laws, standards, and regulations. We will support our key partners to promote sustainable and responsible business practice wherever possible.

We will strive to advance sustainability best practice wherever possible by serving as a collaborator, convener and thought leader in the services we deliver, solutions we develop and practices we adopt. We will work with interested parties on environmental issues to ensure their concerns and expectations are considered in our business decisions and operations.

### 5.1. Procurement

We will embed Sustainability best practice, including formal Net Zero targets, into our procurement policies and when procuring goods and services. We will assess and monitor on a regular basis the environmental and Sustainability targets (including Net Zero), practices and performance of our key suppliers, expecting ongoing improvement in their performance as well as our own.

Capco will generally favor suppliers that adopt a progressive approach to environmental challenges, the climate emergency and sustainable business. We want to work with suppliers who actively reduce their environmental and carbon footprint (through conservation of resources such as energy and materials, waste minimalization and reducing the impact of deliveries and maximizing local sources). Capco asks that all suppliers comply with our Supplier Code of Conduct, undertake an assessment of their commitment to and record of sustainable business practice. We are looking to work with suppliers who use goods and services produced in line with the UN Global Compact on Sustainability and International Labor Organization principles and we will monitor our own operations to ensure that there are no human slavery and trafficking in any part of our business, markets, and supply chain.

We will develop relationships with suppliers who support job creation, facilitate opportunities for small and medium-sized enterprises and consider the life-cycle cost of their products and services. We will work with our current waste management suppliers to understand the lifespan of waste and the impact of our staff behavior and business practices on this with a view to driving improvement in our waste management practices and provisions wherever possible.

## 6. Management System & Standards

In delivering on this policy, Capco is committed to a program of continual improvement and will set annual objectives and targets (including a formal and demanding Net Zero target), measure progress against them and, where appropriate, share our key metrics with stakeholders and external agencies and government. Targets will be reviewed annually to ensure they remain relevant, challenging, and commensurate with our standing as a responsible and sustainable global business and an employer of choice for our people and potential recruits.

In alignment with our Environmental Management System, we are committed to the prevention of pollution in the life cycle of our services, solutions, and business practices.

### 6.1. Regional Operations

Each Capco Region is responsible for deployment and integration of this policy into their local Sustainability policies and practices, business processes and operations. Annually, we measure and report our Scope 1, 2 and 3 emissions through a carbon audit with the local office manager and/or facility manager in each location accountable for maintaining accurate records and providing timely submissions to the Steering Committee.

The annual carbon audit includes the following data: :

- Fuels for heating (natural gas)
- Diesel (for generators)
- Fugitive emissions – from refrigerants, air conditioners, etc.
- Purchased electricity – usage, source, green tariffs.
- Business travel - air, rail, hotel and hired car.
- Purchased goods -paper consumption from printers.
- Waste disposal activities - landfill, recycling, compostable, incinerated.
- Water – usage and waste
- Leased Car Programs – mileage and fuel type.
- Staff homeworking emissions

Each Capco Region / Office Facilities Manager is accountable for compliance with new goals, laws, legislation, standards, best practices, and regulations. Identified changes are brought to the attention of the Chief Risk Officer for compliance monitoring and action planning. Each Region should investigate appropriate certificates for all activities and operations for ensuring the legal compliance of offices and operations. If a Region identifies activities or services that have the potential to deliver an adverse impact on the environment or sustainable business practice, a risk issue will be logged with appropriate controls and an action plan to mitigate the risk and tracked to closure.

## **6.2. Real Estate Strategy**

When considering new offices, selection criteria will include sizing appropriately for required use, locations close to public transportation, green building certifications, renewable energy sources, and appropriate staff to manage the facility for compliance, health and safety.

## **6.3. Energy and Emissions**

Capco will consider energy performance in the procurement, design and refurbishment and management of the buildings we own and lease across the Regions and utilize renewable energy sources where available.

We will look to use motion sensor operated lights in all locations, LED lighting and only authorize the purchase of energy efficient appliances.

## **6.4. Printing and Stationery**

Capco will discourage the use of printed documents wherever possible across our business and promote the efficient use of paper amongst our people. Where printing is required, we will use 100% recyclable paper in our offices in all Regions and recycled branded stationery and order sustainable products where possible.

## **6.5. Travel**

Capco will encourage hybrid working models utilizing collaboration technologies, such as MS Teams, to minimize the environmental impact of the firm's business travel wherever possible. Where travel is necessary, Capco will require staff to book the most environmentally friendly travel option that is available.

Monthly reporting of all travel and associated carbon emissions will be available and used to report progress on targets regularly to our internal stakeholders and feed into the annual carbon audit.

## **6.6. Waste and Water**

We will measure waste generation and water usage across all our offices and operations, where possible and we will strive to reduce and divert waste sent to landfill from our offices.

## **6.7. Sustainable IT**

Capco will implement sustainable practices into the use, management, and disposal of our information technology by reducing our infrastructure footprint for new or changing leased properties, reusing, recycling, or reconditioning our laptops, IT peripherals, toner cartridges, batteries, and mobile devices.

## 7. Reporting Violations and Disciplinary Action

All Capco employees, contractors, and relevant third parties are required to adhere to our agreed Capco policies and standards. Violation of Capco policies and/or standards may result in disciplinary action (up to and including termination). Any suspected violation of a Capco policy or standard should be reported to either a management representative, a Human Resource representative or to the Capco Enterprise Risk team, (Capco.risc@capco.com).

An employee who has violated any company policy or otherwise committed misconduct is accountable for his or her actions. Violators may be subject to a full range of penalties, including termination of employment and legal action in accordance with local law.

Capco will not tolerate any kind of retaliation against anyone who, in good faith, reports a suspected violation of its policies and standards, or any applicable laws governing the locations in which Capco conducts business.

Violations may also be reported using the CAPCO Ethics Web site (<http://www.lighthouse-services.com/capco>). This service is administered in the USA and therefore all personal data you provide to our service provider will be processed in the USA. CAPCO does not tolerate any retaliation against anyone who, in good faith, reports a violation of Capco policy or law or cooperates with an investigation. More information on the Capco Ethics Web site and hotline can be found on the Global Enterprise Risk site on company intranet.

Capco “Speak-Up” Ethics Website: <https://report.syntrio.com/capco/>

Reports to the Capco Ethics Hotline should be made in good faith only. The Company has a strict no retaliation policy. This means you will not be subject to discipline for reporting in good faith that you are concerned about unethical or illegal behaviour. Employees should not use the hotline to report personal grievances.

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