



ESG POLICY

Environmental, Social & Governance

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1.1 WORKING TOGETHER

At COEL, we are all about making a difference and have set ourselves ambitious goals, but we know that we can't do it alone.

From exceeding our 2024 achievement of raising over £40,000 for charitable initiatives, to designing sustainably, making sustainable choices on site, and reducing co2 emissions from site waste and delivering buildings that continue to operate sustainably for years to come... we're working with our clients, partners and suppliers to make a positive impact in our community and on the wider environment around us.

A word from our CEO

After 25 years of COEL and almost 40 years of trading in the fit out space, we understand our responsibilities extend far beyond our business, or even the projects that we deliver for our clients. We have a shared responsibility to consider the impact of the work that we do on the world around us – to take stock and consider whether there is a better way, to ensure a brighter future for everyone.

At COEL, our commitment to Environmental, Social, and Governance (ESG) principles is not just a policy, it's an integral part of who we are and how we operate. Underpinned by our five core values and forming part of a culture for change, we believe that everyone can have an impact if we just work together.

As CEO, I am proud to lead a company that places such high importance on sustainability, social responsibility, and ethical governance. Our ESG policy reflects our dedication to creating a positive impact on the environment, our community, and our stakeholders.

This policy is crucial for us, because it helps to align our values, commitments and long-term vision for the company. By integrating ESG considerations into our business strategy, we ensure that we are not only meeting the needs of today but also safeguarding the future for generations to come. It helps us build trust with our clients, attract and retain top talent, and foster innovation and resilience in a rapidly changing world.

We believe everyone can inspire change and I encourage every member of the COEL team to embrace our ESG policy and contribute to our shared mission of creating a more sustainable and equitable future. Together, we can make a significant difference.

Yours sincerely,

Alistair Rumbelow



1.2 OUR APPROACH

As a commercial design and fit out company, we are uniquely positioned to influence the environmental, social, and governance (ESG) landscape through the choices we make every day; from the materials we source and our working practices, to the way we engage with our people, partners, and the local community. Our approach falls under three key pillars:

Designing responsibly

Having planned, designed and built commercial workspaces for many years, we recognise our role in shaping environments that are not only functional and aesthetic but also environmentally and socially responsible. Wherever possible, we help our clients to make sustainable choices and align our practices with globally recognised frameworks and certifications within the built environment.

Operating sustainably

Our ESG commitments are rooted in the belief that sustainable business is smart business. We strive to reduce our environmental impact, foster a diverse and inclusive workplace, and uphold the highest standards of ethics and accountability. These principles guide our operations, shape our culture, and define our relationships with clients, suppliers, and stakeholders. By embedding ESG into our core strategy, we aim to create lasting value — not only for our clients and employees but also for the environment and society at large.

Prioritising people

The happiness and wellbeing of our people and the people around us is at the heart of everything that we do. From ensuring an inclusive and supportive workplace, to giving back to our community and local charities and maintaining the highest standards of safety on site.

We believe that our work can influence the lives of the people occupying the spaces we design. This guides our approach to planning, designing, and delivering environments that meet the evolving needs of a diverse workforce and shapes our company mission....

OUR MISSION

To enhance working lives through tailored interior design and fit out services that foster productivity, creativity, and wellbeing.



1.3 OUR PROMISE



“To lead with purpose, act with responsibility, and create inspiring spaces that enhance working lives, and are planned with the future in mind.”

Environmental. Social and Governance

At COEL, we are committed to building a better future for our people, our community, our clients and for those that use the workspaces we deliver. Our promise is to work towards the following priorities in terms of Environmental, Social, and Governance:

Environmental

We will design and deliver spaces that minimise environmental impact, using sustainable materials where we can, reducing waste, and promoting energy efficiency. Wherever possible, we align with leading standards in the built environment to ensure our projects contribute positively to the planet.

Social

We will foster a workplace that is safe, inclusive, and empowering. We will support our people and strive to continually improve together, to further embed our five core values and prioritise wellbeing. We will engage with our communities and work together to inspire change.

Governance

We will operate with integrity, transparency, and accountability. Our practices will be guided by ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018, ensuring quality, environmental stewardship, and health and safety across all aspects of our business.

1.4 OUR GOALS



Goal	Target (by end 2026)
Environmental	
Reduce office waste	Introduce new office waste management and start to monitor
Reduce construction project waste	10% increase in kg/CO2 saved YOY relative to projects completed.
Energy efficiency in projects	Take steps to better understand and monitor the environmental impact of projects in progress
Supplier evaluation	All suppliers to meet minimum standards outlined in COEL's sustainability questionnaire
Carbon footprint tracking	Begin carbon footprint tracking and set targets
Social	
Health & Safety training	100% participation in Health & Safety training for all staff
Community engagement	Support at least two community projects per year
Giving back	Provide one volunteer day per year for all staff
Employee wellbeing	Increase number of mental health first-aiders from 2 to 6 and launch wellbeing program.
Charitable donation	Increase charitable donations to £50k per annum
Governance	
ESG oversight	Establish an ESG committee to oversee and report on ESG goals
Transparent reporting	Publish annual ESG report outlining progress, challenges and goals.
Anti-corruption training	Provide annual anti-bribery and corruption training to all commercial teams
ESG integration in risk management	Integrate ESG risks into the company's risk management framework by 2026.
Ethical supply chain	Introduce annual supplier audits to ensure ongoing compliance.

ENVIRONMENTAL

2.1 ENVIRONMENTAL APPROACH

We are committed to minimising our environmental impact and promoting sustainable practices across all areas of our operations. Our environmental policies are designed to support responsible resource management, reduce emissions and waste, and ensure compliance with relevant environmental regulations and standards.

By integrating environmental considerations into our decision-making processes, we aim to contribute to a healthier planet, support climate resilience, and drive long-term value for our stakeholders. We prioritise environmental considerations on site and strive to meet the needs of our clients by adopting sustainable principles in our office designs and fit outs.



Our approach

At COEL, we aim to minimise our environmental impact through a multifaceted approach.

- 1. Sustainable design:** We, prioritise sustainable design in our projects ensuring that our buildings and spaces are energy-efficient and environmentally friendly.
- 2. Reuse and recycle:** Our recycling and reuse initiatives are integral to our operations, reducing waste and promoting the circular economy.
- 3. Supplier selection:** Our commitment to sustainability extends beyond our own operations to include the partners and vendors we work with.
- 4. Continuous improvement:** We are working with our HR team to develop training and development programmes to ensure our teams understand their responsibilities.

2.2 SUSTAINABLE DESIGN

COEL's design principles are increasingly focused on eco-friendly solutions, driven by growing client demand for sustainable practices.

Sustainably designed workspaces integrate energy-efficient systems, responsibly sourced materials, and flexible layouts that adapt to changing needs. In laboratories, where energy and resource demands are typically higher, sustainable design also involves smart engineering solutions that balance performance with environmental responsibility.

Our designs focus on the following 4 key areas:

Space and materials

- ✓ **Sustainable materials:** Recommend recycled, reclaimed, rapidly renewable, or certified materials whenever possible.
- ✓ **Minimise waste:** Retain as much of the existing structure and interior to minimise waste.
- ✓ **Efficient use of space:** Design layouts that maximise utility and minimise waste.
- ✓ **Durability and adaptability:** Choose materials and furnishings that last and can be repurposed or reconfigured.
- ✓ **Inclusive and accessible:** Plan spaces with accessibility and diverse needs in mind.

Energy & water conservation

- ✓ **Energy-efficient lighting:** LED lighting and smart controls (motion sensors, daylight harvesting).
- ✓ **HVAC optimisation:** Energy-efficient heating, ventilation, and cooling systems.
- ✓ **Water-saving fixtures:** Install low-flow taps, dual-flush toilets and water-efficient appliances.

Indoor environmental quality & wellbeing

- ✓ **Air quality:** Use low-VOC paints, adhesives, and finishes; ensure proper ventilation.
- ✓ **Natural light:** Maximise daylight access to reduce energy use and improve wellbeing.
- ✓ **Acoustics and comfort:** Design for thermal, visual, and acoustic comfort.
- ✓ **Biophilic design:** Incorporate natural elements to support mental health.

Compliance & Certification

Wherever possible, ensure that our projects align with core standards such as:

- ✓ **BREEAM** (Building Research Establishment Environmental Assessment Method)
- ✓ **SKA Rating** (RICS sustainability benchmark for fit-outs)
- ✓ **ISO 14001** (Environmental Management Systems)

2.3 UPHOLDING STANDARDS



Recognising the importance of environmental responsibility in every project, wherever possible, COEL aligns its design practices with leading standards such as BREEAM and SKA Rating and adheres to ISO frameworks like ISO 14001 for environmental management.

Taking a future view

Choosing a more sustainable approach to fit outs helps organisations to meet regulatory requirements, reduce operational costs, and demonstrate a commitment to corporate responsibility. Sustainable design in office and lab fit outs is about building smarter and creating spaces that are efficient, resilient, and ready for the future.



SKArating®

BREEAM®



Continuous improvement

COEL is committed to continuously training and upskilling its design fit out and commercial teams, equipping them with the knowledge and skills to prioritise the environment in their work.

This dedication to eco-friendly design not only aligns with client expectations but also underscores COEL's commitment to 'inspiring change' and contributing to a greener future.

Increasingly we are being asked to consider sustainability when designing projects...it is becoming a 'top three' issue for our clients when considering their office and laboratory design. We are pleased to be able to guide and advise our clients on all aspects of sustainable design. We know that every choice we make, from concept to execution, is an opportunity to reduce our impact and inspire change.



Katie Oldknow | Head of Design

2.4 REUSE & RECYCLE









COEL has implemented comprehensive recycling initiatives aimed at minimising environmental impact. By focusing on reducing construction project waste, COEL ensures that materials are used efficiently, and excess is minimised. Waste segregation practices further enhance recycling efforts, allowing for the proper disposal and repurposing of different types of waste.

Working together

Additionally, COEL's partnership with furniture manufacturer Senator has been instrumental in our sustainability journey. This collaboration has led to innovative furniture solutions that not only meet high standards of quality and design but also contribute to significant CO2 recycling efforts.

Monitoring our impact

Through ethical furniture recycling, we've diverted 57,14 kg of furniture from landfill, resulting in a saving of 86,257 kg/CO2, as well as saving 4,300 kg/ CO2 through the removal and recycling of packaging;

Impact of recycling in 2024	
Furniture	Packaging
 298 chairs	 3,354 kg cardboard
 628 desks / tops	 848 kg plastic
 401 pedestals	 98 kg polystyrene
 13 storage units	
 804 screens & misc	
86,257 kg/CO2 saved	4,300 kg/CO2 saved

2.5 CIRCULAR COMMUNITY

As part of our commitment to reusing and recycling and a desire to divert as much as possible from landfill, we employ several community initiatives, including:

Donation of pallets

All of our wooden pallets are delivered to our nominated local charity, the Phoenix Trust, who use them within their woodworking workshop to make furniture, bird boxes and bug houses to sell in the local community.



Furniture donations

We work with local organisations to help recycle unwanted furniture and try to find local organisations (often not-for-profits) who would benefit from a donation. Our teams will:

1. **Remove unwanted furniture.** Clients or referred clients contact us to remove any good quality unwanted furniture which we then try to find homes for in local organisations or store in our local storage facility for future donation.
2. **Donating used furniture.** Either organisations will contact us in need of furniture, or we will seek out local organisations that may need support. Our commercial relocation team then collects the furniture and delivers it to its new home.



2.6 SUPPLIER EVALUATION

Our commitment to sustainability extends beyond our own operations to include the partners and vendors we work with.

COEL's in-house commercial team handles all elements of procurement, including ongoing evaluation of our supply chain. The core principles of COEL's supplier selection include;

- ✓ **Environmental credentials:** preference if certified under ISO 14001, use of sustainable products, efforts to reduce carbon emissions, energy use, and waste.
- ✓ **Sustainable products & materials:** supply of low-VOC, recycled, recyclable materials, transparency in sourcing and support for circular economy principles.
- ✓ **Ethical practices:** commitment to fair labour, diversity, and inclusion and committed to reduce the impact of their own operations on the environment.
- ✓ **Supporting local:** use of local suppliers, in-house relocation team and storage facility to reduce the number of deliveries and unnecessary journeys.
- ✓ **Alignment to certifications:** contribution to BREEAM or SKA Rating credits and provision of documentation and data to support certification submissions.
- ✓ **Collaboration and Transparency:** Open communication on sustainability goals, willingness to share performance data and take part in audits as required.

Supplier evaluation process

STEP 1: Pre-qualification

- a. Suppliers to complete a suitability questionnaire
- b. Supplier must be Safe Contractor accredited

STEP 2: Assessment

- a. Review of certifications, policies, and past performance
- b. Evaluation against COEL sustainability criteria

STEP 3: Approval and monitoring

- a. Approved suppliers added to preferred vendor list
- b. Ongoing performance reviews and audits

STEP 4: Continuous improvement

- a. Feedback to improve sustainability practices
- b. Support for suppliers in their sustainable goals



We appoint suppliers who share our commitment to sustainability because our goal is not just to deliver quality spaces; but to do so responsibly. When our partners uphold the same environmental standards, we can work together build trust, resilience, and long-term value into every project.



Hugh Daniels | Commercial Director

2.7 ONGOING TRAINING

Embedding sustainability into our culture begins with education. Training staff in environmental and sustainable practices ensures that every team member (from designers and project managers to our operational teams) understands their role in reducing COEL's environmental impact and promoting responsible design.

Training fundamentals

We are working with our HR team to build a training and development programme to cover four key pillars:

1. Sustainability fundamentals

- ✓ Climate change and the built environment
- ✓ Principles of circular economy and lifecycle thinking
- ✓ Environmental legislation and compliance (e.g., ISO 14001)

2. Operational best practices

- ✓ Waste reduction and recycling protocols
- ✓ Energy and water conservation in daily operations
- ✓ Sustainable procurement and supplier engagement

3. Health, safety & wellbeing

- ✓ Indoor environmental quality (IEQ)
- ✓ Safe handling of sustainable materials
- ✓ Promoting wellbeing through biophilic and inclusive design

4. Certifications and standards

- ✓ Introduction to BREEAM, WELL and SKA Rating systems
- ✓ Documenting sustainable choices for certification submissions
- ✓ Understanding ISO 9001, 14001, and 45001 frameworks



Office and Lab-specific training

Our ongoing training includes the different environmental considerations for office and laboratory environments, where performance and sustainability must be carefully balanced.



For labs, the focus is often more on containment, cleanability, and energy-intensive equipment.



For offices, the emphasis is on flexibility and future-proofing, wellbeing, and acoustic comfort.

SOCIAL

3.1 SOCIAL APPROACH

At COEL, we believe that our people, partners, and communities are at the heart of our success. Our Social policy outlines our commitment to fostering a safe, inclusive, and supportive environment for all stakeholders. We aim to create positive social impact through our operations, employment practices, and community engagement.

We are proud of our reputation for being a great place to work and for giving back to the community around us and this forms a core part of our company ethos. But we know that we can only maintain this if our team share the same core values, so we work hard to foster a positive and inclusive company culture.



Our Social approach is centred around our commitment to PEOPLE, by

1. **Supporting local communities.** Engaging with and contributing to the communities in which we operate.
2. **A culture of inclusivity & wellbeing.** Cultivating a workplace that values diverse backgrounds and prioritising the physical and mental wellbeing of our employees, contractors, and clients.
3. **Engaging and developing our team.** Providing training and apprenticeship programs and engaging employee voices through surveys and employee forums.
4. **Upholding fair labour practices.** Ensuring ethical treatment, fair pay, and equal opportunities for all employees and subcontractors.

At the heart of our brand is a deep commitment to people; our employees, our customers, our community and the people that occupy our spaces. We believe that sustainable growth is only possible when we champion local partnerships and create opportunities that uplift every voice. Our goal is to ensure that our message is not only heard but also felt where it matters most: by improving the working lives of real people.



Sarah Butler | Marketing Director

3.2 OUR CULTURE

We create an inclusive environment where employee wellbeing and engagement are high on the agenda. We see our employees as people, not numbers.

We are also a company with a conscience so are committed to giving back to the community and being as sustainable as possible in our practices. We encourage our staff to live and breathe by our company values and reward their efforts to embody them.

Our values

Our values underpin everything we do; from how we work together to how we show up for our customers and community. They shape our culture, influence our decisions and they remind us who we are, what we stand for, and how we want to make a difference in the world. They are embedded into our employee development frameworks, and they shape the way that our teams conduct themselves on a day-to-day basis.

01. **ACT RESPONSIBLY**

Professional + Accountable + Honest + Committed

02. **STRIVE FOR BETTER**

Adaptable + Innovative + Resilient + Efficient

03. **WORK TOGETHER**

Collaborative + Transparent + Supportive + Committed

04. **BE A GOOD PERSON**

Appreciative + Inclusive + Respectful + Optimistic

05. **INSPIRE CHANGE**

Empathetic + Ethical + Conscious + Visionary

3.3 EMBEDDING CULTURE

The COEL Culture Team plays a central role in embedding company values and enhancing employee engagement through a structured set of initiatives.

This employee-led team, is cross-functional and formed to champion internal communication, drive engagement, and embed the company's values across all departments. It operates as a key component of the broader company strategy, aligning closely with COEL's ambition to become an employer of choice.

Core pillars

The team's work is structured around several strategic pillars, each with its own set of initiatives and project leads;

1. **Communication:** Ensuring consistent and inclusive messaging across office and site-based teams.
2. **Values and Behaviours:** Embedding COEL's core values into daily operations and decision-making.
3. **Engagement:** Encouraging a sense of belonging through events, forums, and feedback loops.
4. **Reward and Recognition:** Celebrating achievements and reinforcing positive contributions.
5. **Learning and Development:** Promoting continuous growth and career progression.
6. **Corporate Social Responsibility (CSR):** Leading community and environmental initiatives.
7. **Recruitment, Attraction & Retention:** Enhancing employer branding and staff retention.
8. **Diversity and Inclusion:** Creating an equitable and inclusive workplace. Educating employees on cultural diversity.
9. **Health and Wellbeing:** Supporting mental, nutritional and physical wellness across the workforce. Westfield Health, offering an EAP service

The team delivers a 12-month calendar of activities, which includes:

- ✓ **Wellbeing campaigns** (e.g. Dementia Week, litter picking, Wimbledon tournament, steps challenge). Appointing mental health first aiders across office and site.
- ✓ **Company-wide updates** with interactive elements like quizzes and BBQs.
- ✓ **Volunteering days** and community outreach.
- ✓ **Internal newsletters** and WhatsApp groups to improve communication.
- ✓ **Reward and recognition** schemes to recognise contribution.

Where business and people strategies meet...

The Culture Team is not a standalone function; it is embedded within COEL's People Strategy. It supports broader business goals to align people strategies with business priorities, including;

1. **Improving** retention and flexible benefits
2. **Enhancing** leadership capability
3. **Driving** cultural and behavioural change.



3.4 PRIORITISING WELLBEING

We are deeply committed to the physical and mental wellbeing of everyone connected to our operations, including employees, contractors, and clients. We believe that a healthy and supported workforce and stakeholder community is essential to building a resilient, ethical, and high-performing organisation.

Our goal is to promote safety, reduce stress, and foster a culture of care and respect across all environments in which we operate.

Physical Wellbeing

We care about the health of our people and the people that use our spaces. We ensure that all workspaces [whether on-site, remote, or client-facing] are safe, ergonomically sound, and conducive to physical health. Our initiatives include:

- ✓ Regular health and safety assessments and compliance with relevant regulations.
- ✓ Access to wellness resources including health benefits such as contributions to medical costs and access to gym memberships.
- ✓ Safe working conditions for contractors, with welfare areas, clear protocols, first aid representatives and training.
- ✓ Encouragement of healthy lifestyle choices through education and incentives such as cycle to work schemes for staff.

Mental Wellbeing

Mental health is a priority, and we actively work to reduce stigma and provide meaningful support. Our mental wellbeing initiatives include:

- ✓ Team of fully trained mental health first aiders on site at COEL HQ.
- ✓ Confidential access to mental health professionals and employee assistance programs (EAPs) on request.
- ✓ Training to recognise and respond to mental health concerns.
- ✓ Promotion of work-life balance through working from home opportunities.
- ✓ Open communication channels that foster psychological safety and trust.

Inclusive support for all stakeholders

We extend our wellbeing commitment beyond our employees. We collaborate with partners to ensure that contractors have access to safe working conditions and welfare resources. We also strive to create positive, respectful, and supportive interactions with clients, recognising their wellbeing as part of our broader social responsibility.

Continuous improvement

We regularly review and enhance our wellbeing programs based on feedback, emerging best practices, and evolving needs. By prioritising wellbeing, we aim to build a culture where people feel valued, supported, and empowered to perform at their best.

3.5 LEARNING & DEVELOPMENT

A happy, collaborative team means a lot to us, so we do everything we can to make that happen. We empower everyone at COEL to take ownership of their development by providing a strong and well supported development framework.

Development Frameworks

COEL's employee development frameworks are a structured way to help employees grow their skills, advance their careers, and contribute more effectively to the organisation. They align individual growth with business goals and help us to foster a culture of continuous learning. Core areas include:

1. **Competency mapping:** the skills, knowledge, and behaviours required
2. **Learning & development:** training, workshops, e-learning, and mentoring.
3. **Performance management:** feedback, appraisals, and goal-setting
4. **Career pathing & succession planning:** progression routes and leadership development opportunities.
5. **Employee engagement & feedback:** 1:1s, surveys and forums
6. **Recognition & rewards:** learning achievements and performance milestones.

Ongoing training

The development frameworks help to identify areas where additional training may be required. This can include;

- ✓ Internal learning, such as lunch and learns
- ✓ External courses funded by the company
- ✓ Continuous Professional Development with structured mentoring
- ✓ Insourced learning by bringing in experts to speak with our teams

Apprenticeships

Our apprenticeship schemes are designed to nurture emerging talent by combining hands-on experience with structured learning. We offer apprentices the opportunity to gain industry-recognised qualifications while working alongside experienced professionals, contributing to real projects from day one.

These programmes support career development, promote diversity, and help build a skilled, future-ready workforce aligned with our company's values and long-term goals.



3.6 DIVERSITY & INCLUSION

At COEL, we believe that diversity and inclusion are fundamental to our success and sustainability. We are committed to creating a workplace where individuals of all backgrounds, identities, and experiences are respected, valued, and empowered to thrive.

Our policies and practices are designed to foster a culture of belonging, where diverse perspectives are not only welcomed but seen as essential to innovation and responsible decision-making.

Embedding a culture of inclusion

We recognise that inclusion goes beyond representation. It requires continuous learning, open dialogue, and accountability. Through our employee culture team groups, inclusive leadership practices, and community engagement, we aim to build an environment where everyone feels safe, supported, and heard.

Our commitment to diversity and inclusion extends to our partners, suppliers, and the communities we serve, as we work collaboratively to drive positive social impact and equity across our value chain.

Key Aims from the Culture Team:

- ✓ Improve engagement by encouraging an inclusive workforce.
- ✓ Educate colleagues on the 9 protected characteristics. – Equality and diversity annual compliance training.
- ✓ Recruit from a wider talent pool to enhance innovation.
- ✓ Promote fairness and equality across all levels.
- ✓ Build brand reputation through ethical and social responsibility.

Cultural education and equity-focused practices.

- ✓ Hidden Disabilities Membership
- ✓ Menopause Awareness Training
- ✓ Cultural Appreciation Days
- ✓ Guest Speakers
- ✓ D&I Policy Review
- ✓ Monthly blogs and discussion topics
- ✓ Employee Forum for inclusive feedback and idea sharing

2025 activities

So far this year we have run a number of events designed to foster a sense of inclusion, including;

Brew Monday for mental health awareness, Chinese New Year celebrations, Time to Talk Day, Brain Tumour Awareness Month, International Women's Day, Celebrating neurodiversity week – recognising the skill and talents of neurodiverse people and Pride month – desk drop on the history and stonewall riots

3.7 COMMUNITY ENGAGEMENT

We believe that every company has a responsibility to support their local community, to give back and to foster a culture of giving back. One of our core values is to 'be a good person' – something we actively encourage in anyone that works as part of the COEL team

We actively engage with and support the local community through various programmes and partnerships. This holistic approach to community support underscores our belief in giving back and fostering a sense of shared responsibility and care.

We sponsor local sports teams, donate tools to a local apprenticeship scheme to help get young people into work, and support local awards including the 'Rising Young Stars' which recognises exceptional young people making a difference, and the 'Science and Tech' awards, recognising some of the exceptional work of Cambridge's thriving Science and Tech community.

We also encourage and support our employees in their charitable endeavours, recognising the importance of causes close to their hearts, and watching them with pride as they reach their goals.



The COEL team has always been proud of the place we hold within the community. Whilst The Phoenix Trust is our nominated charity which we fundraise and volunteer for throughout the year, we also prioritise supporting local community causes and charities that are of personal importance to our employees. It is through investing in these endeavours that we hope to provide a working life worth living.



3.8 CHARITY IN FOCUS

At COEL, we are committed to supporting the community in which we are based. Our chosen charity, The Phoenix Trust, is at the heart of our efforts, reflecting our dedication to making a positive impact.

The Phoenix Trust

The Phoenix Trust has been COEL's nominated charity for several years. This vibrant charity and social enterprise is based in Milton, just a few miles away from our Cambridge HQ. Founded in 2006, Phoenix provides meaningful work experiences for young people and adults with a range of learning disabilities and special, additional, or complex needs.

COEL support The Phoenix Trust in several ways; from providing excess materials from projects that can be upcycled and sold, such as palettes, to providing expertise to help improve the Phoenix Trust site, raising their profile with the wider community and fundraising from community events.



3.9 COMMUNITY EVENTS

We run several events within the community to raise money for local charities and organisations – often nominated by our team.

Annual cricket event

For the last three years, we have arranged a Charity Cricket day at Fenner's Cricket Ground in Cambridge with Property Consultants Carter Jonas. With a capacity of 1,000 people, we plan and manage the entire event, including a raffle and a silent auction, with 100% of proceeds going to our nominated charities – The Phoenix Trust and LandAid, with Tom's Trust and the Cambridge Cancer Research Hospital also benefitting in 2025.

The total amount raised in 2023 was £14,000, £28,000 in 2024 and 2025 has seen us raise over £45,000 for charity.



Annual NHS tea and coffee drive

After learning of how well the NHS cared for a close relative of one of our team at Addenbrookes, we wanted to find a way to give back. The request that came back was for tea, coffee and biscuits! So, every January (to counter 'blue Monday' with 'brew Monday!') our team comes together with local business to collect up and deliver sustenance.



3.10 FAIR LABOUR PRACTICES

At COEL, we are committed to upholding fair labour practices across all areas of our operations and supply chain. We believe that every individual has the right to work in an environment that is safe, respectful, and free from exploitation or discrimination.

Our commitment includes:

- ✓ Prohibiting forced, bonded, or child labour in any form (see the next page).
- ✓ Ensuring fair wages and benefits that meet or exceed legal and industry standards.
- ✓ Providing safe and healthy working conditions for all employees and contractors.
- ✓ Promoting equal opportunity and non-discrimination in hiring, promotion, and treatment of workers.

Modern slavery policy

COEL has a zero-tolerance approach to any form of modern slavery, which encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within the business or our supply chain.

Our suppliers: COEL operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions.

Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. As part of our contract with suppliers, we require that they confirm to us that:

- ✓ They have taken steps to eradicate modern slavery within their business
- ✓ They hold their own suppliers to account over modern slavery
- ✓ (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- ✓ (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

We may terminate the contract at any time should any instances of modern slavery come to light.

Training: We conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators: We will know the effectiveness of the above steps if:

- ✓ No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

GOVERNANCE

4.1 GOVERNANCE APPROACH

At COEL, we recognise that strong governance is the foundation of responsible business conduct and long-term value creation. Effective governance ensures transparency, accountability, and ethical decision-making, which are essential for building trust with our stakeholders.

By adhering to robust governance principles, we not only comply with regulatory requirements but also foster a culture of integrity and responsibility. This commitment to good governance helps us mitigate risks, enhance operational efficiency, and drive long-term value for our clients, employees, and the communities we serve.

Governance framework

At COEL, our governance framework is built upon five key pillars that ensure robust oversight, transparency and accountability across our operations.

- ✓ **Board oversight and accountability:** our Non-Executive Chair provides independent leadership and strategic guidance, ensuring our board remains objective and effective.
- ✓ **Health and safety:** our Health and Safety Advisors are dedicated to maintaining the highest standards of workplace safety, protecting our employees and clients alike.
- ✓ **Risk management and compliance:** we maintain risk registers for all core areas of business operations and our auditors play a crucial role in verifying our financial integrity and compliance with regulatory standards.
- ✓ **Ethical and effective business practices:** as well as anti-corruption policies, and whistleblower protections, our internal audit function rigorously evaluates our internal controls and processes, ensuring that we operate efficiently and ethically.
- ✓ **Transparency and reporting:** our Employee Forum fosters open communication and engagement, empowering our workforce to contribute to decision-making processes and organisational improvements, that feed into our annual reports.

Continuous improvement

We continuously review and strengthen our governance practices to ensure they remain fit for purpose in a dynamic and evolving business landscape. Through effective governance, our senior team aims to manage risk, uphold compliance, protect stakeholder interests, and support our environmental and social commitments.

COEL BOARD

Non-Executive Chair

Health and Safety Advisors

Auditors

Internal Audit

Employee Forum

4.2 HEALTH & SAFETY

At COEL, the health and safety of the people around us is of paramount importance. We aim to achieve excellence in occupational health and safety performance, not only in respect to our employees, but also in relation to all suppliers, sub-contractors, client staff, the general public and any others who are involved or affected by our activities.

Our aim is to create working environments which are free of work-related, accidents, incidents and ill health.

Working together

Health and safety at COEL is a collaborative approach, involving mandatory training for all staff to ensure everyone is well-informed and prepared to uphold our safety standards.

We are committed to creating a safe and healthy work environment, which is why we collaborate closely with our independent Health and Safety providers, Workplace Risk Management. Their expertise helps us implement and maintain rigorous safety standards across all our operations. Additionally, we have a robust programme of independent audits conducted by Flagship Partners, ensuring that our health and safety practices are continuously reviewed and improved.

Continuous improvement

We are very proud of our excellent health and safety record. However, we do not take this for granted. Our commitment to safety is ongoing, and we are always looking at ways to protect our employees, sub-contractors, clients and general public.

As well as the independent audits from our external providers, we have set up a Health and Safety Committee to monitor and continuously improve health and safety, as well as providing an opportunity for employees to voice their concerns, share ideas, and contribute to the ongoing enhancement of our safety protocols.

This proactive and inclusive approach not only protects our workforce but also fosters a culture of shared responsibility and continuous improvement, enhancing our operational efficiency and reputation as a responsible and caring organisation.

In the commercial design and fit out space, where precision and pace are critical, we never compromise on the wellbeing of our people, our partners, or our clients. A safe site is a successful site, and with robust processes in place, our commitment to the safety of everyone around us is embedded in every decision we make.



4.3 OUR ACCREDITATIONS

We are proud to have been awarded ISO certifications for Environmental, Quality and Health & Safety Management, as well as holding a safe contractor certification.

Awarded by independent bodies, these certifications reflect the quality, safety, and efficiency of our services and processes and help to reassure our customers that they are doing business with a reputable and responsible company.



ISO 9001:2015:
Quality Management System



ISO 14001:201:
Environment Management



ISO 45001:2018:
Health and Safety Management



Constructionline
Gold Member

Achieving and maintaining our accreditations, including ISO certifications, reflects our commitment to excellence, consistency, and continuous improvement. These standards provide a trusted framework that supports the quality of our project delivery, strengthens client confidence, and ensures we operate with integrity and accountability at every level.



4.4 TRANSPARENT REPORTING

To ensure the effectiveness and integrity of our governance framework, we have established robust policies and practices for ongoing monitoring and accountability. These mechanisms are designed to uphold transparency, enforce compliance with internal policies and external regulations, and support ethical decision-making at all levels of the organisation.

Our policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- ✓ **Anti-slavery policy.** This policy sets out COEL's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- ✓ **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- ✓ **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- ✓ **Code of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Auditing

External audits: We engage independent external auditors to conduct regular audits of our financial statements. These audits provide an objective assessment of our financial reporting, internal controls, and compliance with accounting standards and regulatory requirements. By subjecting our financial practices to third-party scrutiny, we reinforce stakeholder confidence, mitigate financial risk, and ensure that our governance structures support ethical and responsible financial management. The findings from these audits are reviewed by the Board and any recommendations are acted upon promptly to strengthen our governance framework.

Internal audits: Regular audits, performance reviews, and risk assessments are conducted to evaluate governance practices, while clear lines of responsibility and reporting ensure that individuals and teams are held accountable for their actions. Through these measures, we aim to foster a culture of continuous improvement, trust, and responsible leadership.

Employee forum

COEL's Employee Forum serves as a vital platform for open dialogue, collaboration, and shared decision-making between employees and leadership. It is designed to empower staff by providing a structured space to voice ideas, raise concerns, and contribute to the continuous improvement of our workplace culture.

The forum promotes mutual respect, inclusivity, and accountability, ensuring that employee perspectives are actively considered in shaping company policies and practices.



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