



**SICUT**<sup>TM</sup>

SUSTAINABLE | COMPOSITE | STRUCTURAL



# Corporate Social Responsibility Report

## Snowdon Road Site

2024

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## A

## Joint Letter from William Mainwaring, CEO, &amp; Deepak Aggarwal, Chairman



Sicut is the global market leader in the manufacture of composite railway sleepers from sustainable materials and supplies customers in more than 20 countries.

Our mission is to deliver better-performing, consistent quality, more sustainable, and better value infrastructure solutions. We aim to positively impact our customers, their infrastructure, our communities and the wider environment.

We're committed to protecting natural resources and supporting global targets for deforestation reversal and plastic waste recycling. This requires innovation and close collaboration with our customers and stakeholders to create safer, longer lasting solutions.

Importantly, we replace existing materials sourced from environmentally demanding mining and logging operations, while improving community coherence through using locally sourced recycled materials as part of a truly circular economy.



We understand that our customers often have conflicting demands. By using recycled plastics to produce long lasting and better performing products, Sicut delivers the best value and enhances infrastructure safety and reliability, while reducing carbon emissions and supporting challenging environmental and sustainability commitments.

Our strong corporate responsibility underpins sustainable growth, focusing on ethical governance, environmental stewardship, data integrity, and our people's development.

Social responsibility is, however, at the heart of all we do - not only because it makes business sense, but because it is the right thing to do.

Our employees remain our greatest asset. Their growth and professional development drives our success, which is why we invest in both training, and a company culture that makes Sicut a meaningful place to work.

“Our employees’ success is our success, which is why we invest in their professional development...”

## B

### About Sicut Enterprises Ltd.

**Sicut Enterprises Ltd. has been manufacturing and supplying the world with sustainable infrastructure products made with recycled plastic for over 20 years.**

Sicut specialises in producing composite railway sleepers, switch & crossing bearers, and bridge sleepers – all produced using materials that might otherwise end up in a landfill site – or in the ocean.

Sicut's products are compliant with ISO European, Australian, and US standards, to name just a few. Its composite railway infrastructure technology has also been installed in over 20 countries around the world including the UK, Germany, Scandinavia, the Netherlands, Austria, Spain, the USA, Canada and Australia and has been fully approved by many prestigious national railway companies such as Deutsche Bahn, the Swedish Transport Authority, and Network Rail.

Sicut's products are made using a special blend encompassing recycled plastics.

They can withstand extremely harsh conditions, such as poorer track beds and wetter/dirtier ballasts, and are immune to infestations, moisture, rot, and decay – unlike their wooden counterparts. They are significantly more resilient to the impacts of climate change.

Sicut's sleepers not only have an extremely long lifespan when compared to traditional sleepers made from timber, steel and concrete - they are also 100% recyclable at the end of their long service lives and can be remade into further sleepers or other infrastructure products, creating a true circularity.

Compared to hardwood and concrete, Sicut sleepers deliver substantial reductions in embedded carbon of up to 200,000 kgCO<sub>2</sub>e per km (independent Environmental Product Declaration (EPD) available). Potential whole life carbon saving for the track infrastructure might be 5 or 6 times this figure. Furthermore, GWP calculations do not capture other environmental savings such as land and water use.

Other environmental benefits of Sicut sleepers include:

- Reduced weight (100kg each vs 300kg for concrete sleepers), meaning additional carbon savings can be made whilst transporting the sleepers to their intended destination.
- Sicut's sleepers require less crib ballast due to reduced construction depth. This can mean savings of up to c400 tonnes less ballast per km.
- Longer lifespans and increased durability mean that Sicut sleepers do not need replacing as often as hardwood or concrete sleepers.

While Sicut's products are inherently sustainable, Sicut remains acutely aware of its wider environmental responsibilities and the importance of a good CSR strategy. Sicut's commitment to the environment and sustainability is therefore reflected in its activities every day and not just in its products.





01

# CORPORATE SOCIAL RESPONSIBILITY STRATEGY



## A

## CSR Strategy

	Focus/KPI	2023 Results	2024 Results	2025 Target
<b>Safety</b>	Accident frequency rate (FR1)	None	1	None
<b>Ethics</b>	Anti-bribery – Risks and mitigation actions	100%	100%	100%
<b>Environment</b>	Greenhouse gas emission reduction on scope 1+2+ 3	N/A	-30.42 <sup>1</sup>	None
		N/A	-5.20 <sup>2</sup>	5.00
		N/A	-1.89 <sup>2</sup>	None
<b>Management Practices</b>	Employee Satisfaction Survey average score	4.09/5	3.78/5	4.19/5
<b>Community</b>	Jobs provided to the Local Communities	100%	100%	100%

<sup>1</sup> The increase in Scope 1 was due to the hiring of a sales team and purchase and use of a delivery vehicle

<sup>2</sup> Reduction Targets for Scope 2 and Scope 3 were missed in 2024 owing to a 6% increase in the GHG from the National Grid supply which provides 100% of the power.

<sup>3</sup> There is no reduction scheduled for 2025 as a new R&D function is being implemented to design future products.

<sup>4</sup> In 2024 extra questions were added on pay satisfaction which cause target of 4.19 to be missed.

Sicut's CSR strategy is overseen by its executive suite.

Sicut's executive team determines the company's CSR strategy, objectives, and KPIs. These are made with ISO 9001:2015, 14001:2015, 45001:2018, and the Global Reporting Initiative (GRI) index in mind.

Sicut's CSR progress is monitored throughout the year and is discussed during the quarterly board meetings.

Data is gathered primarily through Sicut's cutting-edge in-house data management software, SicutVision™, which is then compiled into an annual report.

In addition to the above, Sicut also has an Environmental Product Declaration (EPD) for its composite sleeper products which details the sustainability of its products.

Further, detailed information about Sicut's CSR strategy can found via its Corporate Social Responsibility Policy.

## B

### CSR Policy (at a glance)

**Operating in a responsible and sustainable manner is important to Sicut Enterprises Limited.**

At Sicut, we define Corporate Social Responsibility as:

- conducting business in a socially responsible and ethical manner;
- protecting the environment and the safety of people.
- supporting human rights; and
- engaging, learning from, respecting and supporting the communities and cultures within which we work.

Sicut is committed to maintaining the highest standards of integrity and corporate governance practices to maintain excellence in its daily operations, and to promote confidence in its governance systems.

- Sicut conducts its business in an open, honest, and ethical manner.

- Sicut recognises the importance of protecting all our human, financial, physical, informational, social, environmental, and reputational assets.
- Sicut advises its partners, contractors, and suppliers of its Corporate Social Responsibility Policy, and will work with them to achieve consistency with this policy.

Sicut is committed to protecting the health and safety of all individuals affected by our activities, including our employees, contractors and the public.

Sicut provides a safe and healthy working environment and will not compromise the health and safety of any individual.

- Sicut is committed to environmental protection and stewardship.
- Sicut recognizes that pollution prevention, biodiversity and

- resource conservations are key to a sustainable environment and will effectively integrate these concepts into its business decision-making.
- All employees and contractors are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

Sicut is fully committed to:

1. The EU Directive of Restriction of Hazardous Substance (RoHS) and promoting social and environmental concerns with manufacturing partners within our supply chain.
2. Promising to conserve our environment by managing and mitigating the impact of harmful substances, as defined by industry standards, in its material and manufacturing processes.
3. Being a socially and environmentally conscious company, operating in full compliance with the local laws and regulations regarding the ethical, corporate governance, labour, health and safety, and environmental compliance of the countries within which we conduct business.

## C

## CSR Policy (cont.)

As a global supplier to customers worldwide, Sicut operates across a diverse range of cultures and international markets. We are proud of our commitment to apply fair labour practices, while respecting the national and local laws of the countries and communities where we operate and are committed to providing equal opportunity in all aspects of employment. We do not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment.

Sicut works with its suppliers to help them treat their workers and employees fairly and with dignity and respect, maintain safe working conditions, and conduct manufacturing activities in an environmentally safe and responsible manner. Sicut does not tolerate human rights abuses, human trafficking and/or slavery, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.

Sicut endeavours to ensure that its supply chain also conforms to these objectives.

Sicut strives to understand and respect the cultural values and laws wherever we operate. We actively support initiatives in those communities where our employees live and work. We encourage our employees to contribute time and energy in leadership and other roles in community organizations.

Sicut believes its business behaviour must be socially responsible and should take account of the impact our activities have on the economy and society. We aspire to make a positive impact on the community within which we operate.

Our policy is to make social responsibility a core value of Sicut as it makes sound business sense to do so and, more importantly, because we know that it is the right thing to do.







02

**OPERATIONAL  
EXCELLENCY**



## A

## Safety

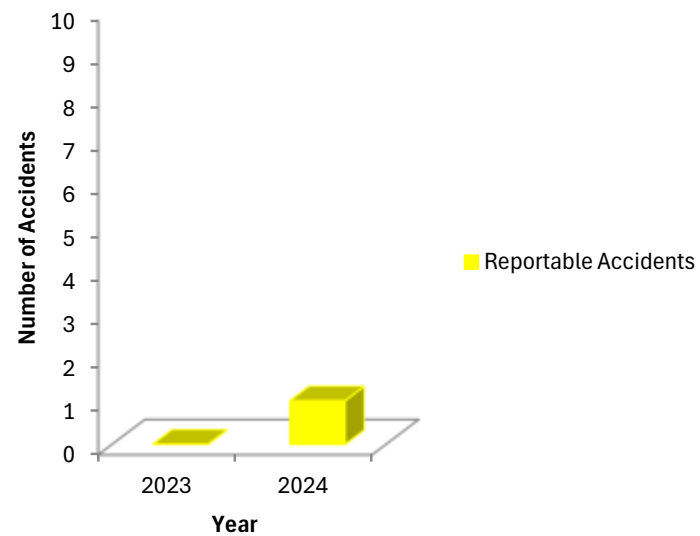


Safety is of the utmost importance to Sicut. We aim to have zero serious accidents for all our employees and contractors across our sites. Sicut records all near misses for the purpose of investigation and continuous improvement.

Sicut defines serious accidents and near misses as such:

- Serious accident: "any event that results in injury to a person which affects their ability to perform their job".
- Near-miss: "any incident where an accident could have occurred".

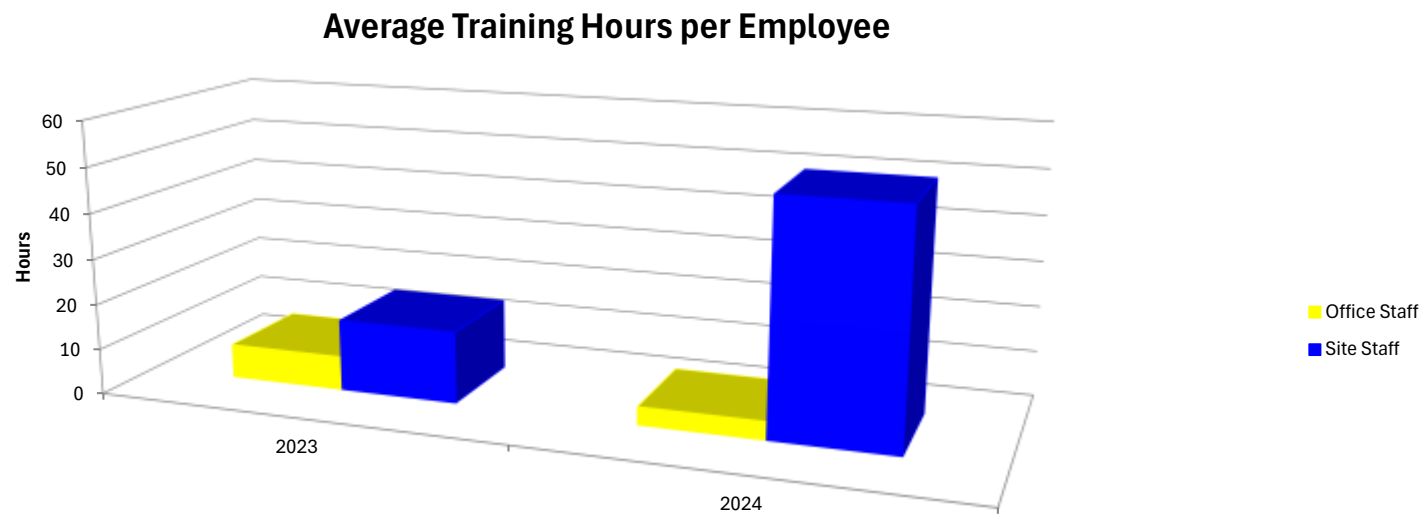
### Reportable Accidents



## B Training

To ensure the safety of its employees and contractors, Sicut is dedicated to regularly training its staff.

More information can be found in Sicut's Staff Performance Review Form, Employee Handbook, Training Roles Matrix and Training Records. [hyperlink these on SicutVision – internal access only].





## C

## Environment

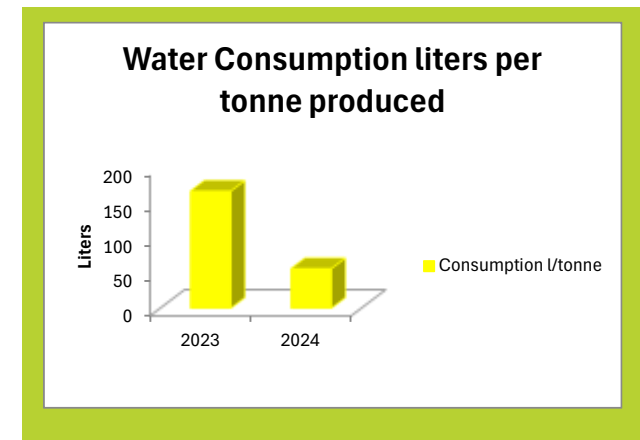


**Sicut is committed to protecting the environment.**

This includes the prevention of pollution, sustainable resource use, climate change mitigation and adaptation, the protection of biodiversity and ecosystems and any other specific commitments which are relevant to the context of the organisation.

Sicut does not source any conflict minerals or metals and complies with all obligations, codes of practice and all other requirements applicable to our activities including the nature, scale and environmental impacts of its activities, products and services.

	2023	2024	2025 target
<b>Emissions per tonne (CO2 equivalent)</b>	0.11	0.12	0.11
<b>Energy consumption in kWh per tonne</b>	458	529	502



<sup>1</sup> The National Grid (through which Sicut has to source its electricity) had a 6% increase in CO2 per kWh in 2024 from the baseline numbers used in 2023.

<sup>2</sup> Sicut targeted a 5% reduction in 2024, this was missed owing to unexpected and unavoidable client small order patterns causing inefficiencies in the heating process.

## D Environment (cont.)



<b>Total Waste</b> (metric tonnes) <sup>4</sup>	<b>2023</b>	<b>2024</b>	<b>2025 target</b>
<b>Non-Recycled Waste</b>	20.0	13.5	N/A
<b>Recycled Waste</b>	2.5	13.0 <sup>1</sup>	N/A
<b>Non-Recycled Waste</b> (kg / tonne of product)			
<b>Unsorted waste</b>	5.5	3.7	3.6
<b>Hazardous industrial waste</b>	None	0.1	0.14 <sup>2</sup>
<b>WEEE</b>	None	None	None <sup>3</sup>
<b>Recycled Waste</b> (kg / tonne of product)			
<b>Cardboard, Wood, Plastic</b> <sup>4</sup>	0.3	2.4	2.3
<b>Metals and oxides</b>	0.2	1.3	1.3
<b>WEEE and batteries</b>	None	None	None <sup>3</sup>



### Information about the above statistics

Sicut sells its waste metal, cardboard, wood, and batteries to recycling companies for future use. Sicut reuses all its own plastic waste from its production processes, and this is not listed above.

<sup>1</sup> In 2024 packaging of raw materials was changed by suppliers creating a larger recycling intensity. This caused reduction targets to be missed in 2024.

<sup>2</sup> Hazardous waste (lubricating oils are not collected until there is a full container. This takes several years.)

<sup>3</sup> WEEE waste is collected and stored until there is enough to recycle / dispose. Most items have a projected lifetime of 5 years or greater.

<sup>4</sup> Does not include reused/recycled pallets, Sicut distributes 100% of its pallets for reuse.

## E

## Ethics

**Sicut respects all its stakeholders and acts with the utmost integrity towards them.**

Due to this reason, Sicut has a strict anti-bribery policy. It defines bribery as:

“the practise of offering or receiving an incentive, to gain a reward or an advantage. Bribes can take a variety of forms and might include cash, gifts and hospitality, a contract award, or gaining inside information about up-and-coming work. They are given to someone with the intention of influencing them to act in a way that favours an individual or a company.”

Sicut has a no-tolerance policy towards people employed by or doing business on behalf of a company under Sicut control, ever offering, making, asking for, or accepting a payment, gift or favour in return for favourable treatment, or to gain a business advantage.

As per the UK Bribery Act 2010, Sicut

does not allow any of its employees or contractors to:

- offer a bribe
- agree to offer a bribe
- accept a bribe
- agree to accept a bribe
- request a bribe
- bribe a foreign public official to obtain or retain a business advantage
- fail to prevent bribery in a commercial organisation (this means a company failing to have adequate procedures in place to prevent anyone associated with a company – employees, or anyone working on the company’s behalf, such as a contractor or agent – committing offences against the UK Bribery Act).

The UK Bribery Act applies to all Sicut’s employees, or those working on its behalf, regardless of whether they’re working in the UK or overseas. For more info, see Sicut’s anti-bribery policy (on request).

Sicut also has a strict Data Protection and Security Policy. It is committed to ensuring that all personal data handled by the organisation will be processed according to legally compliant standards of data protection and data security.

Sicut’s data protection policy details its data protection and security aims such as:

- notifying its staff of the types of personal information that Sicut may hold about them, our customers, suppliers and other third parties and what we do with that information.
- setting out the rules on data protection and the legal conditions that must be satisfied when Sicut collects, receives, handles, processes, transfers and stores personal data and ensuring staff understands Sicut’s rules and the legal standards; and
- clarifying the responsibilities and duties of staff in respect of data protection and data security.

Sicut adheres to the General Data Protection Regulation (Regulation (EU) 2016/679).

For more information, please see Sicut’s Data Protection and Security Policy and Data Protection





03

PEOPLE



# A

## Labour & Human Rights Policies



**Sicut takes the wellbeing of its employees and contractors extremely seriously and has a comprehensive set of policies and procedures to reflect this.**

### Modern Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Sicut are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of its business. It has a zero tolerance to slavery and human trafficking.

### Quality, Environmental and Occupational Health & Safety Policy

This policy is designed with ISO9001:2015 & ISO14001:2015 & ISO45001:2018 in mind and covers the

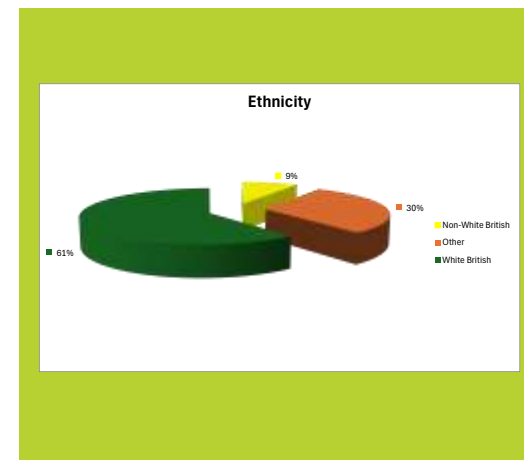
Following labour & human rights areas:

- reducing hazards, OH&S risks, prevention of injury and ill health.
- ensure commitment to provide safe and healthy working conditions for the prevention of work-related injury and ill health which satisfies the requirements of all our customers, stakeholders and interested parties whenever possible and is specific to our OH&S risks and opportunities.
- ensure that all employees are made aware of their individual obligations in respect of this policy, and ensure that consultation & participation of workers, to be actively involved in the management of the system and the activities supplied.

### Employee Handbook

Sicut's employee handbook covers the following topics, all in accordance with UK law and the employees and stakeholders' best interests in mind:

- standards of work and performance
- right to work in the UK
- induction
- probationary period
- hours of work
- leave entitlement
- sickness
- retirement, pensions, and benefits
- policies
- procedures
- grievance



## B

## Equal Opportunities

**Sicut is committed to encouraging equality and diversity among our workforce and eliminating unlawful discrimination.**

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

Sicut are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of its business. It has a zero tolerance to slavery and human trafficking.

Sicut always:

- encourages equality and diversity in the workplace as they are good practice and make business sense
- creates a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where

individual differences and the contributions of all staff are recognised and valued,

- takes seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others during the organisation's work activities,
- makes opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation,
- reviews employment practices and procedures when necessary to ensure fairness, and update them and the policy to take account of changes in the law,
- monitors the make-up of the

the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy (available upon request).

