Halo Benefits

POLICY

Environmental Policy

How we measure and reduce
our environmental impact.

UPDATED	VERSION	NEXT REVIEW
23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
Date approved	23rd November 2026
Next Review Date	23th November 2027
Review frequency	Annually
Applies to	All directors, employees and contractors of Halo Benefits Ltd, and the goods and services we buy
Related policies	Code of Conduct and Business Ethics, Supplier Code of Conduct

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

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1. Purpose of the policy

This policy sets out how Halo Benefits Ltd manages its environmental impact and the commitments we have made to measure and reduce our greenhouse gas emissions. Our footprint as a small software company is modest, but we want to understand it properly and act on it early.

We aim to be straightforward about where we are. We do not hold ISO 14001 certification, our net-zero target has not been validated by the Science Based Targets initiative, and we have not yet measured our Scope 3 emissions. This policy describes what we do now and what we have committed to do.

2. Scope

This policy applies to **Halo Benefits Ltd** (company number 17577358) and to all directors, employees and contractors. It covers our operations, our use of cloud services and equipment, travel, and the goods and services we buy.

3. Our environmental profile

We are a remote-first company with use of a serviced office. We do not manufacture products, run a vehicle fleet or own premises, and our platform is hosted with cloud providers. We expect our main sources of emissions to be:

- cloud hosting and software services;
- goods and services we buy, including IT equipment and professional services;
- business travel; and
- home working and shared use of the serviced office.

We comply with all relevant environmental law, including the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 and our duty of care for waste under the Environmental Protection Act 1990.

4. Our commitments

Commitment	Timing
Measure our Scope 1 and Scope 2 emissions using the GHG Protocol	For financial year 2026/27
Measure our main Scope 3 emissions: cloud services, business travel and purchased services	For financial year 2026/27
Publish a Carbon Reduction Plan in the format of Procurement Policy Note 06/21	By 30 June 2027
Set interim reduction milestones in our Carbon Reduction Plan	By 30 June 2027
Reach net zero (target not yet validated by the Science Based Targets initiative)	2040

Our Scope 1 emissions are expected to be minimal, as we have no fleet or owned premises. We will work with our serviced office provider and suppliers to get reliable data, and will say clearly where figures are estimated.

5. Working remotely and travel

- Remote-first working avoids most daily commuting and the need for dedicated premises.
- Video calls are the default for meetings, and travel is only for genuine business need.
- Where travel is needed, we prefer rail over flights within mainland UK where practical, and public transport over cars.
- Business travel is recorded so it can be included in our emissions measurement.

6. Cloud and digital services

Cloud hosting is likely to be one of our largest sources of indirect emissions. We will:

- prefer cloud providers that publish renewable energy commitments and provide carbon reporting, and use that reporting in our measurement;
- consider the carbon intensity of hosting locations where this fits with data protection, resilience and customer requirements;

- right-size our infrastructure and switch off unused systems; and
- apply sensible data retention so we do not store data we no longer need.

We rely on our providers' published commitments and do not independently verify them.

7. Equipment, buying and the office

- We buy IT equipment only when needed, choose energy-efficient models, consider refurbished equipment and extend device life wherever possible.
- Old equipment is disposed of only through a certified recycling provider offering WEEE-compliant recycling and certified data erasure, and never in general waste.
- We consider environmental impact alongside cost, quality and security when choosing suppliers, and ask significant suppliers about their own environmental policies.
- We prefer digital documents and e-signatures to printing and posting.
- We ask our serviced office provider about its energy, recycling and waste arrangements, and encourage energy-saving habits at home.

8. Sharing our progress

All staff receive this policy when they join. We share progress with staff every year, will publish our Carbon Reduction Plan once it is complete, and answer customer and supplier questions about our environmental performance honestly.

9. Roles and responsibilities

- **Board of Directors:** approves our Carbon Reduction Plan and monitors progress against our commitments.
- **Designated director:** a director nominated by the Board coordinates emissions measurement, supplier data requests and the Carbon Reduction Plan.
- **Anyone buying on our behalf:** applies the buying and travel principles in this policy.
- **Everyone:** follows this policy and suggests improvements.

10. Raising concerns and breaches

Environmental concerns, suggestions or suspected breaches of this policy should be raised with the designated director or at **compliance@halobenefits.co.uk**. Serious concerns,

including suspected breaches of environmental law, can be raised under our Whistleblowing Policy. Breaches, such as improper disposal of electronic equipment, may be dealt with under our disciplinary procedure.

11. Review

This policy is reviewed annually, and sooner after any significant change, and will be updated once our first emissions measurement is complete and our Carbon Reduction Plan is published in 2027. The Head of People & Partnerships proposes changes and the Board of Directors approves them.

> **QUESTIONS ABOUT THIS POLICY?**
> Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.