

ESG CSR etc

As an SME we do not have the resources not many large companies have, we are increasingly being asked for information regarding ESG and its numerous derivatives such as CSR et al.

To save having to repeat the same questions over and over the following seeks to provide the answers to the most frequently asked questions on this subject.

ESG seeks to combine many of the standalone responsibilities' businesses seek to comply with in order to be a fair and good corporate entity.

Environmental, social, and corporate governance (ESG)

- Shouldering a fair share of one's social responsibility.
- Ethical business management.
- Combating corruption/anti-competitive behavior

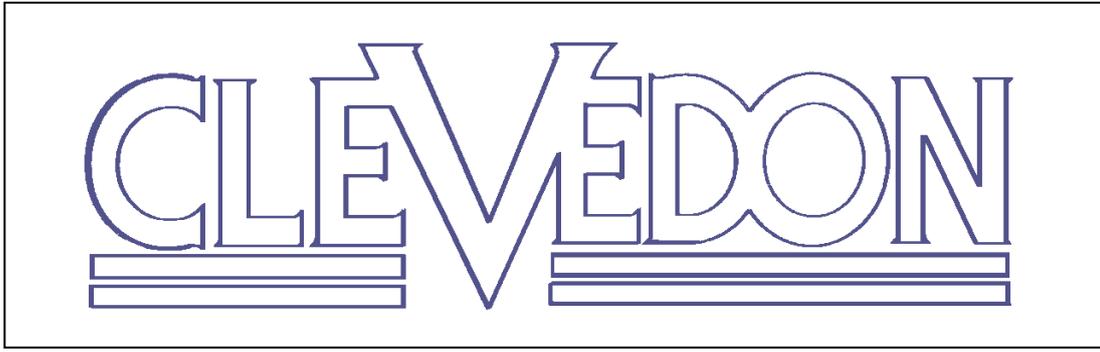
Corporate social responsibility (CSR)

- Environmental social responsibility.
- Ethical/human rights social responsibility.
- Philanthropic corporate responsibility.
- Economic corporate responsibility.

Typical questions and answers

Does Clevedon Fasteners Ltd comply with all national laws and regulations, as well as international conventions and legislation applicable to them, and does it obtain, maintain, and ensure compliance with all requisite permits and licenses?

Yes.



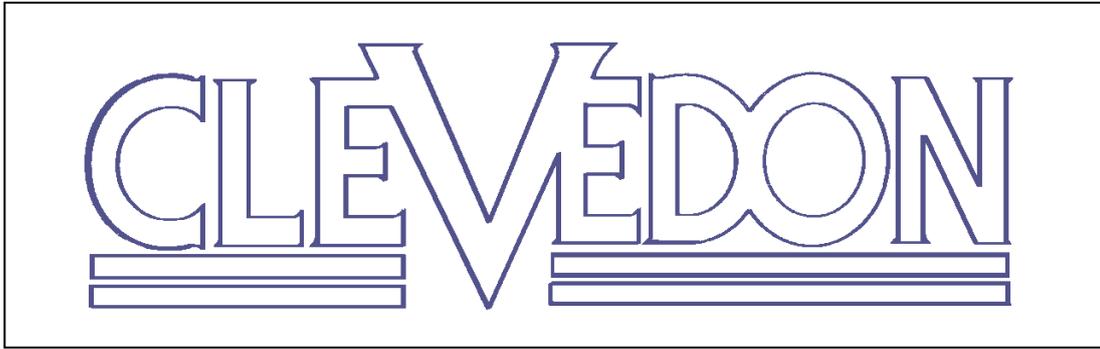
1. Clevedon Fasteners Ltd have not been or are currently subject to any form of legal action.
2. accounts audited annually, no management letters.
3. Monthly Management Accounts are reviewed by management and outside stakeholders within 10 days of the relevant month end.
4. H&S audited externally on a monthly basis; HR issues externally reviewed by a specialist legal firm.
5. Clevedon Fasteners Ltd Comply with modern slavery act, enhanced EU Russian sanctions requirements, Conflict Minerals etc.
6. Management system approved to ISO 9001 and environmental processes to ISO 14001, both audited externally by BSI.
7. Insurance "Risk stop Audit" undertaken and Electrical Certification up to date.

Does Clevedon Fasteners Ltd have an anti-corruption- and anti-bribery policy or Code of Conduct in place?

Yes.

1. Employee Handbook. [Clevedon Employee Handbook] section 6 page 28.
2. Bribery Act Notice [Bribery Act 2010 CPM17 New] circulated to all employees.
3. [Download our anti slavery and human trafficking policy.](#)

Does Clevedon Fasteners Ltd have a policy or statement in place addressing the management of material (risks to Clevedon Fasteners Ltd) and salient (risks to people) human rights risks it is exposed to through its products and processes in line with the UN Guiding Principles on Business and Human Rights?



Yes.

1. Annual insurance review covers all material risks (copy available upon request)
2. H&S policy and HR (Company hand book) seek to cover all salient risks to people (employees, customers, suppliers and wider public).
3. We abide by modern slavery requirements and general respect for human rights and conflict minerals,
4. not dealing with sanctioned countries and abiding strictly by the EU Enhanced Russian sanctions with regards to processes and products.
5. We are not aware of the UN Guiding principles but seek to do the "right thing" .

Where Clevedon Fasteners Ltd.'s operations affect the (land) rights of local (indigenous) communities, has Clevedon Fasteners Ltd developed a process to engage with and seek Free Prior and Informed Consent (FPIC) from these affected communities?

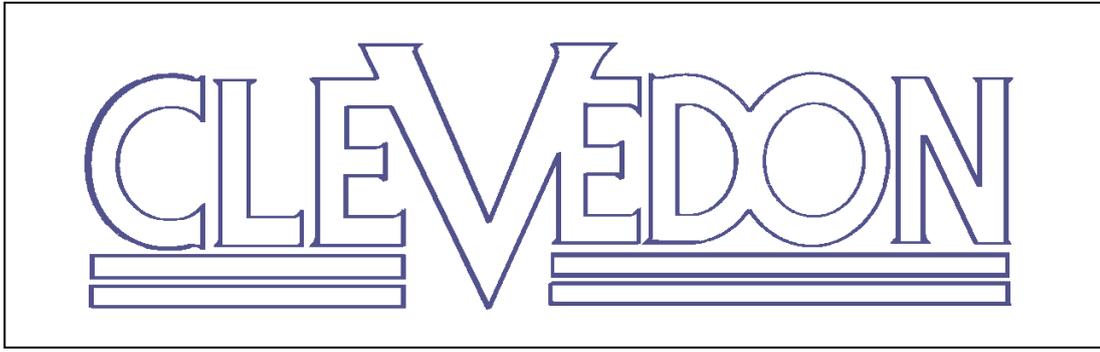
No

- We are an SME operating from rented premises and so this section is not applicable in our opinion.

Does Clevedon Fasteners Ltd know who their main stakeholders are (e.g. local communities, employees, NGOs, local authorities) and does engagement with these stakeholders take place on an open, systematic and constructive basis?

Yes

- Clevedon Fasteners Ltd maintain an up to date "Stakeholder Register" We consider this to be commercially sensitive but is available upon request subject to the requesting agency providing acceptable bona-fides.



Does Clevedon Fasteners Ltd have, or participate in, an effective operational-level grievance mechanism for stakeholders who may be adversely impacted? Here, indicators of effectiveness include pro-active communication about the mechanism, no grievances open for >3 months, stakeholder perception surveys, tracking of repeat grievances, evidence of adaptations to policies/procedures as result of grievances, concrete examples of remediation efforts.

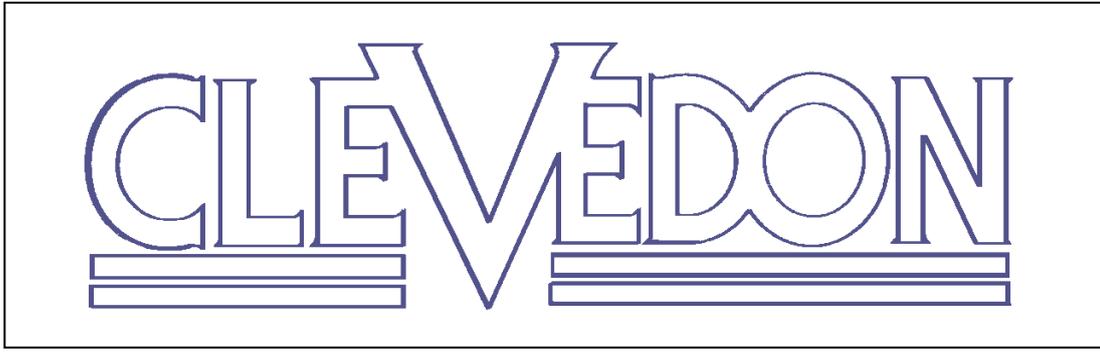
Yes

1. Employee handbook [Clevedon Employee Handbook].
2. No grievances since 2012 major overall of HR processes and procedures.
3. Learning style survey carried out and external monitoring of employee attitudes and communication.
4. Chapel fields Ltd (external provider) review and management training

Does Clevedon Fasteners Ltd monitor its scope 1 and 2 GHG emissions, and does it have time-bound intermediate targets in line with the Paris Climate goals (maximum 1.5-degree temperature rise) to reduce them?

Yes.

1. Scope 1 and 2 completed as far as is practical for an SME.
2. Scope definitions. [GHG Scope definitions], Emissions monitoring. [Total CO2 2023], [CO2 Emissions Jun 2023], Energy use monitored. [Total Energy 2023], [KWH-million Rivets 2023]
3. continual attempts to reduce footprint.



Does Clevedon Fasteners Ltd monitor its scope 3 GHG emissions?

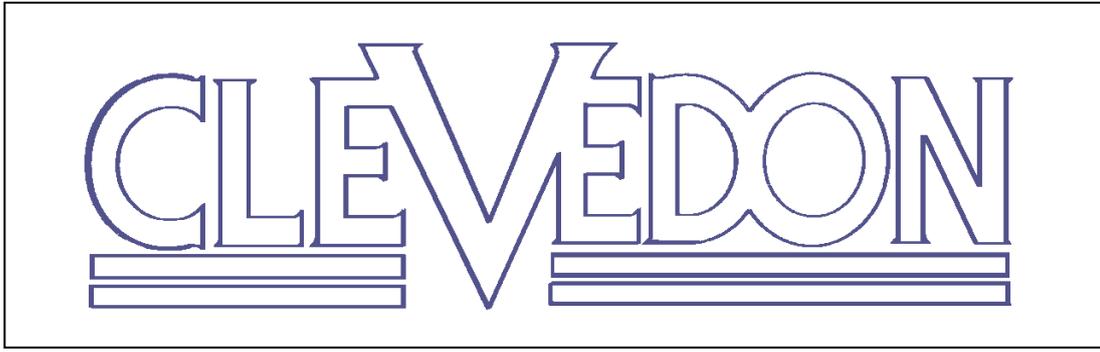
No.

In our opinion Scope 3 is currently beyond the capability of an SME to monitor. This is reviewed on a regular basis as the scope 3 requirements continue to develop.

Does Clevedon Fasteners Ltd assess its exposure to physical climate risks and take measures to mitigate this risk? Physical climate risks: the risk that droughts, floods, extreme weather events etc. can pose to a Clevedon Fasteners Ltd.'s assets, supply chain and transportation routes.

Yes.

1. Clevedon Fasteners Ltd has a continuous improvement programme regarding our journey to net Zero within the financial confines of an SME.
2. Recent improvements (2023)
 - Lights progressively changed to LED.
 - "Dirty processes" (cleaning of oily parts) outsourced with significant energy savings.
 - Rivet miles travelled reduced by managing and reducing transits between subcontractors.
 - Timers and monitoring applied to compressed air system to ensure not active when not required.
 - Quotes for solar panels received and Combined heat and power unit. currently both too expensive



Does the client assess its exposure to physical climate risks and take measures to mitigate this risk? Physical climate risks: the risk that droughts, floods, extreme weather events etc. can pose to a client's assets, supply chain and transportation routes.

Yes.

1. This is done through our ISO14001 approval/auditing process and our annual insurance renewal review.
2. We have multiple suppliers to protect our input supply chain.
3. Multiple carriers regarding transport.
4. We have and continue to seek second sources of manufacture to protect against key machinery failure and an aging workforce.

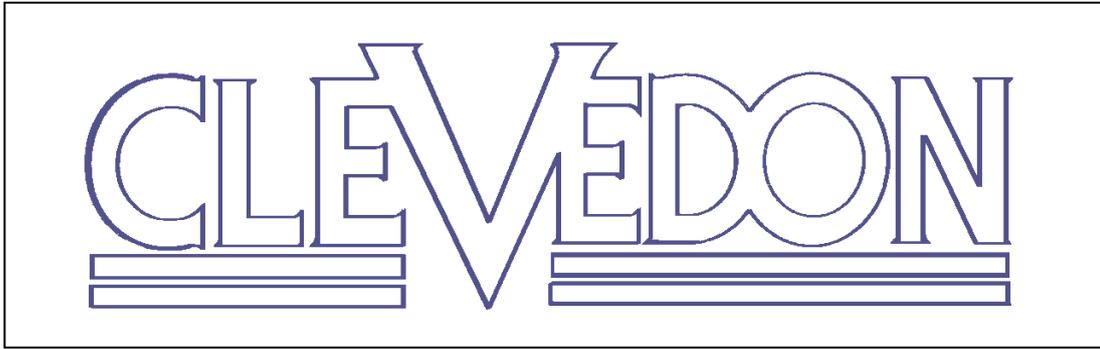
Has Clevedon Fasteners Ltd assessed its (potential) negative impact on the environment (e.g. biodiversity loss, pollution of water, soil or air) and does Clevedon Fasteners Ltd take measures to minimise, mitigate and/or compensate this impact?

Yes.

1. BSI, ISO14001 audits.
2. Protective bunds for oil storage

Is Clevedon Fasteners Ltd aware of how its business model depends on ecosystem services such as the provision of fresh water, fibres or pollination and does Clevedon Fasteners Ltd take measures to preserve these services or reduce dependency where possible?

Yes.



Clevedon Fasteners Ltd are aware of the need to protect the environment and takes the effects of any investments or actions into consideration, our aim is to act as "good company and thoughtful neighbour" in terms of not undertaking any actions to specifically damage such things.

Does Clevedon Fasteners Ltd take measures to promote circularity and reduce the use of virgin material and waste (e.g. through design, recycling, lifetime extension), if applicable?

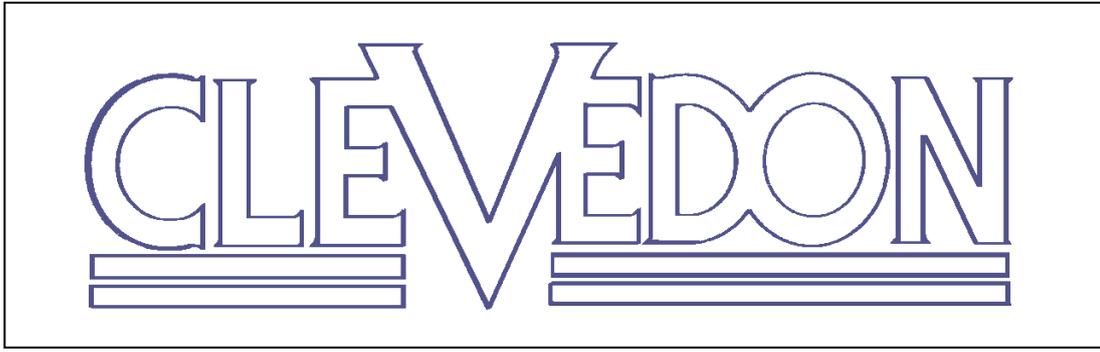
Yes.

1. We recycle where possible,
2. We encourage returnable packaging where appropriate.
3. By design, we encourage customers to use products by cold forging as the process produces no material scrap (net form processing) .
4. We manufacture self-piercing rivets which seek to replace spot welding which is considered a "dirty process" [high energy usage, high emissions, high temperature, danger to eyesight].
5. Our products are not time sensitive.

Has Clevedon Fasteners Ltd experienced any material/persistent/repetitive NGO campaigns or negative media attention in the past 2 years?

No

Has Clevedon Fasteners Ltd experienced any material incidents (such as environmental pollution, spills, fires, safety accidents) at its facilities, or has Clevedon Fasteners Ltd been penalized by inspection authorities in the past two years in relation to shortcomings in its management of sustainability risks?



No

Does Clevedon Fasteners Ltd show a declining or stable trend in terms of GHG and other emissions, injuries, fatalities, spills, fires, and other relevant E&S KPIs?

Yes.

1. Clevedon Fasteners Ltd maintain and update all KPI's we consider to be relevant to the Business.
2. Any HSE events are recorded in the accident book and depending upon the severity of the incident, to the HSE or relevant body.
3. Emissions monitoring is carried out regularly.
4. Energy use monitored is carried out regularly.

Hopefully the above covers the most often asked questions regarding ESG. Any specific queries not covered above should be directed to me

Steve Hardeman

Managing Director