



# Natilik's Ethical Approach

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# 1 Our Ethical Approach

Since the founding of Natilik, the ambition for the business was about more than profit. We have always had a balanced purpose with our 5 founding principles and our goal was always to create a company that was good for shareholders, people, clients, partners and our community.

Natilik is a principle driven company and our principles are fundamental to how we approach everything we do. Demonstrating our principles and the behaviours & conduct associated with them is just as important as the results we achieve. These principles not only explain our purpose but how we achieve our purpose. It is really important to Natilik that we have amazing relationships and interactions and how we deal with our clients, people, partners, suppliers, the communities in which we operate and our impact on the environment are fundamental to achieving this purpose.

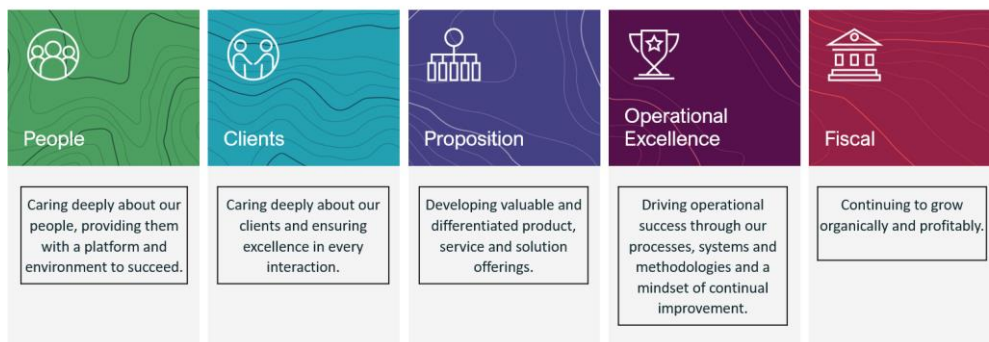
## Natilik's Business Model:



## Our Commitment to our 5 Founding Principles:

Our Purpose & Mission

### Founding Principles



Natilik's ESG Approach Version 3. November 2023

## 2 Good Business Starts with B

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At Natilik, we believe there is a better way of doing business than the conventional capitalist approach that puts profit above everything else. This is why in FY22 we started our B-Corps journey to be certified as a B corporation which is part of a global movement of companies reinventing business as a force for good in society.

To become a certified B Corp we need to pass a rigorous test every three years to prove we meet tough standards of social and environmental performance, accountability and transparency. Passing this test (scoring over 80 points) and being a certified B Corp provides us with an official stamp of approval that we don't just say we do these things but they are part of who we are.

We were officially accredited with our B-Corps certification in January 2023.

## 3 Our Partner Relationships

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Our defined ethical approach is designed to provide clarity about our expectations of all our partners and our extended supply chain. We want to ensure attention is given around the sustainability of all aspects of business operations which include integrity conflicts of interest, labour practices, health & safety and the impact on the environment. We apply these approaches internally at Natilik and hence we expect any partnership we have to an approach close to ours.

We are committed to building trusted relationships with partners and communities by;

- 1, Having good open relationships with our partners
- 2, Complying with our contractual commitments including timely payments
- 3, Seeking shared commitment to continuously improve
- 4, Meeting regulations and compliance to laws and industry best practice

### 3.1 The Importance of Compliance in Summary

Compliance with all applicable laws and regulations is a matter of course for Natilik. We require our partners to adopt the same approach.

In particular we expect:

- All partners to comply with the laws, regulations & guidelines that are relevant to them & their activities
- All partners observe applicable antitrust & competition law standards. This is about making sure they do not undertake any unlawful activities such as agreements with competitors about prices, agreements on market allocation or unlawful exchange of competitively sensitive information with competitors.
- No partner to commit any form of fraud or fraudulent behaviour.
- No partner to undertake any activities that could constitute any offence under applicable anti-bribery legislation.

- All potential conflicts of interest must be disclosed in a fully transparent manner to Natilik’s Executive Team.
- Partners must disclose all business activities that may result in a conflict of interest in relation to arrangements between Natilik & the partner.

Below are our expectations from our partners and suppliers;

### **3.1.1 Environmental Responsibility Expected from Partners**

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Partners who partner with Natilik must demonstrate a commitment to environmental responsibility by:

- a. Complying with all applicable environmental laws, regulations, and standards in their operations.
- b. Minimising the environmental impact of their products and services.
- c. Reducing greenhouse gas emissions, conserving resources, and promoting sustainable practices in their business operations.
- d. Implementing processes for waste reduction and responsible disposal of waste and hazardous materials.
- e. Collaborating with Natilik to identify opportunities for joint environmental initiatives.

### **3.1.2 3. Social Responsibility**

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Suppliers must uphold social responsibility by:

- a. Promoting diversity and inclusion in the workplace, ensuring equal opportunities for all employees.
- b. Ensuring safe and ethical working conditions for their employees and adhering to labour and human rights laws and regulations.
- c. Encouraging fair wages and benefits for all employees.
- d. Supporting community engagement and development through philanthropic initiatives or volunteer programs.
- e. Maintaining open and transparent communication with their workforce and stakeholders.

### **3.1.3 4. Governance & Ethical Business Practices**

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Suppliers should maintain high standards of governance and ethical business practices by:

- a. Operating with integrity and transparency in all business dealings.
- b. Avoiding conflicts of interest, corruption, bribery, and unethical business practices.
- c. Complying with all relevant laws, regulations, and industry standards.
- d. Safeguarding intellectual property and confidential information.

### 3.1.1 4. Suppliers/Partners Adherence to Critical Polices

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Suppliers should maintain high standards of governance and ethical business practices by ensuring the following policies are in place:

- Modern Slavery and Human Trafficking Policy
- Corporate and Social Responsibility Policy
- Anti-Bribery and Anti-Corruption Policy
- Ethics Policy
- Data and Privacy Policy
- Security Policy

## 4 Our People Relationships

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Natilik believes in fair & ethical employment practices & uphold high standards for our people's well-being. We do this through the following;

### 4.1 Salaries and Benefits

We ensure all employees have clear contracts supported by clear salary and benefit arrangements and always paid on time. We also commit to regular pay reviews and independent benchmarking to ensure we are paying fairly and at the market rate. Natilik pays above the minimum wage globally. We expect all our partners meet the national minimum wage requirements.

### 4.2 Freedom of Association

Natilik employees are free to join an association of their choosing (Such as workers council, union or similar). We expect our partners to have the same approach.

### 4.3 Whistleblowing

We will respect all employees who wish to report actual or suspected misconduct in good faith. There will be no discrimination of our employees, retaliation, or intimidation. We expect our partners to behave in the same approach.

### 4.4 No Child Labour

There is no recruitment of child labour at Natilik. We recruit no employees under the age of 18 due to the nature of our professional services. We expect all partners not to employ any workers under the age of 16.

### 4.5 Employment is freely chosen

All work is conducted on a voluntary basis and not under any threat. Employees are free to leave their employment after reasonable notice. We expect our partners to have the same approach.

## 4.6 Anti-Slavery in the Modern Day

Natilik complies with the anti-slavery & human trafficking laws, statutes, regulations & codes. Natilik does not engage in any activity that would constitute an offence under the Modern Slavery Act globally. We expect our partners to adopt the same commitments and to notify Natilik as soon as they become aware of any actual or suspected slavery or human trafficking in any supply chain connected to Natilik. Natilik annual audit all partners Modern Day Slavery Statements to ensure we can commit to a slavery free supply chain.

## 4.7 No Discrimination

We will not tolerate any discrimination against our employees because of race, nationality or ethnic origin, gender, pregnancy, marital or parental status, religion or belief, sexual orientation or any other protected characteristic specified under applicable anti-discrimination law. Very simply any form of negative discrimination will not be tolerated, and we expect our partners to have the same approach.

## 4.8 Disability Inclusion

At Natilik disability inclusion is very important and we take the same approach of a zero tolerance to any disability discrimination. We are committed to ensure we support all disabilities at Natilik and make the required, reasonable adjustments.

## 4.9 Behaviour in the workplace

Being respectful and having empathy for others is a key part of our culture and something we expect from all. Good relationships with others is really important and we have a workplace free from harassment, bullying or intimidation. We expect the same from our partners.

## 4.10 Reasonable working hours

We operate within the relevant laws & regulations, and we expect our partners to do so too. We have a responsibility to ensure our people do not work excessive hours and annual leave allowances are taken.

## 4.11 Commitment to Training & Development

We believe it is important to invest time and money in the training and development of our people. We are committed to ensure our people have the right training to enable them to perform their roles to the standard required and also to the level of accreditation required. We are commitment to ensure we invest in our people development and growth and ensure we are supporting our people with development and training plans.

# 5 Health & Safety

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At Natilik our people's safety is paramount. We always consider working environments and ensuring we are complying with Health & Safety requirements. We expect our partners to work to this same standard.



## 5.1 Occupational Safety

Health & Safety within the home and office are carefully considered by Natilik. We also review risks when engineers attend site and ensure these are detailed in our RAM documentation. We ensure the correct training is provided and guidelines are maintained.

All employees should be encouraged to freely raise safety concerns.

We expect our partners to adopt the same approach.

## 5.2 Emergency Preparedness

Natilik identify and assess potential emergency situations and events and minimise our risk by practices evacuation procedures, having Health & Safety policy and dedicated first aiders and fire wardens. We expect our partners to have the same practices in place.

## 5.3 Occupational Injury and Illness

Natilik encourage all employees to report any injury or illness at work. These are officially recorded. We would investigate and implement any corrective action if needed and expect our partners to have the same approach.

## 5.4 Good Working Conditions

Employees have free access to regularly cleaned toilet facilities, refreshments, kitchen for food preparation, storage and eating facilities as a minimum. We expect our partners to have the same commitment to good working conditions for all employees.

## 5.5 Health & Safety Communications

We provide appropriate health and safety training and ensure we have clear posters available within our offices. We expect the same of our partners.

# 6 Environment

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At Natilik we want to minimise the adverse effects of our operations on the community, environment, and natural resources. We do this by the following;

- Commitment to Measuring our Carbon Footprint.
- Commitment to Off Setting our Carbon Footprint.
- Commitment to Pollution Prevention and Waste.

## 6.1 Commitment to Measuring our Carbon Footprint

We have partnered with Climate Partner to measure our Carbon Footprint. Understanding our usage helps us plan for improvements. We would encourage all our partners to measure their footprint.

## 6.2 Commitment to Off Setting our Carbon Footprint

We have partnered with Ecology to off-set our Carbon Footprint once it has been measured. We are committed to off setting our Carbon Footprint annually.

## 6.3 Commitment to Pollution Prevention and Waste

We are committed to controlling our pollution by the energy we use. Our global offices are designed to only use the floor space we require and hence we have recently downsized our floor space (despite growing out headcount) by adopting a Hybrid approach to working. Less space has meant less energy consumption and pollution. Our offices have been designed to save energy through smart energy saving lighting, automatic night switch for screens, smart temperature controls.

We are committed to managing our waste responsibly through recycling office waste and our electrical waste responsibly. We also ensure we keep office consumables to a level that we buy what we use with a commitment of zero waste. Catering is ordered for only people that accept invites to lunches and we are committed to keeping food waste to a minimum. We are now plastic free in our global offices too.

We also encourage our people to make environmental considerations when traveling to ensure flights and long-distance drives are kept to a minimum or planned ahead to ensure if required they combine multiple meetings. We use Webex for virtual meetings which reduces our carbon footprint.

# 7 Our Give-Back

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We are committed to give 1% of our EBITDA to our Give-Back mission and we are committed to do this every financial year at Natilik.

We distribute the funds on the following basis;

1/3 Giving Back to our Natilik Peoples Chosen Charities through Cash Donations

1/3 Giving Back to supporting our Natilik Communities which are run by our Natilik employees to raise awareness and drive better outcomes.

Our Current Communities

- Race In Tech
- Women In Tech
- LGBTQ+
- Mental Health
- Physical Health
- The Green Team

1/3 Supporting our B-Corps Mission

We also allow everyone at Natilik a volunteering day each year to do something that is important to them and their community. Many of our people have used their days for team volunteering activities.

## 8 Diversity & Inclusion

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We are committed to constantly ensuring we are having an open and honest dialogue about D&I. We are diverse and we believe inclusive, but we can always be better and the biggest way we can ensure change is frequent nudges and good conversations. We are also committed to always challenging our decisions to ensure they are inclusive and encourage diversity. Our recruitment team are dedicated to making sure our roles appeal to all and all candidates go through fair and inclusive process.

We flourish with diversity...we want to culture-add and not just culture fit for our people.

Having commitment to Diversity & Inclusion best practice is a key requirement for our partners.

## 9 Commitment to Grass-roots

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We are committed to investing in grass-route talent at Natilik. There is clear evidence that this works at Natilik as 85% of our leadership team has been developed within Natilik. We're also committed to entry roles such as Technical Apprenticeships and People Experience Apprentices which allow entry level roles to have an opportunity to learn whilst performing a role. We are also committed to re-skilling or current employees and supporting them with new skills via the Apprenticeship Levy scheme.

We would always support our partners with their own grass route initiatives and encourage partners to invest in such programmes.



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