



TOWER
Cold Chain

Sustainability Report **2023**



ClearVUE.Biz
Your Net Zero Partner

In collaboration
with **ClearVUE.Biz**



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Message From The CEO



As we address the challenges presented by our industry, Tower Cold Chain is called upon to foster innovation and collaboration among all stakeholders, shaping the way we operate and the solutions we provide. In recent years, we have successfully introduced products and services that enhance and optimise our sustainability efforts, both as a supplier and as an employer.

Our goal is to achieve carbon neutrality by 2030 and it brings me great pleasure to share the strides Tower Cold Chain has taken in working towards this ambitious goal. With the release of our inaugural Sustainability Report, I trust that all readers will gain insight into the paramount importance we place on our environment within Tower Cold Chain.

At the core of our company values is a commitment to sustainability, not only in our solutions and working environment but also in ensuring our employees operate within a culture that encourages freedom and expression.

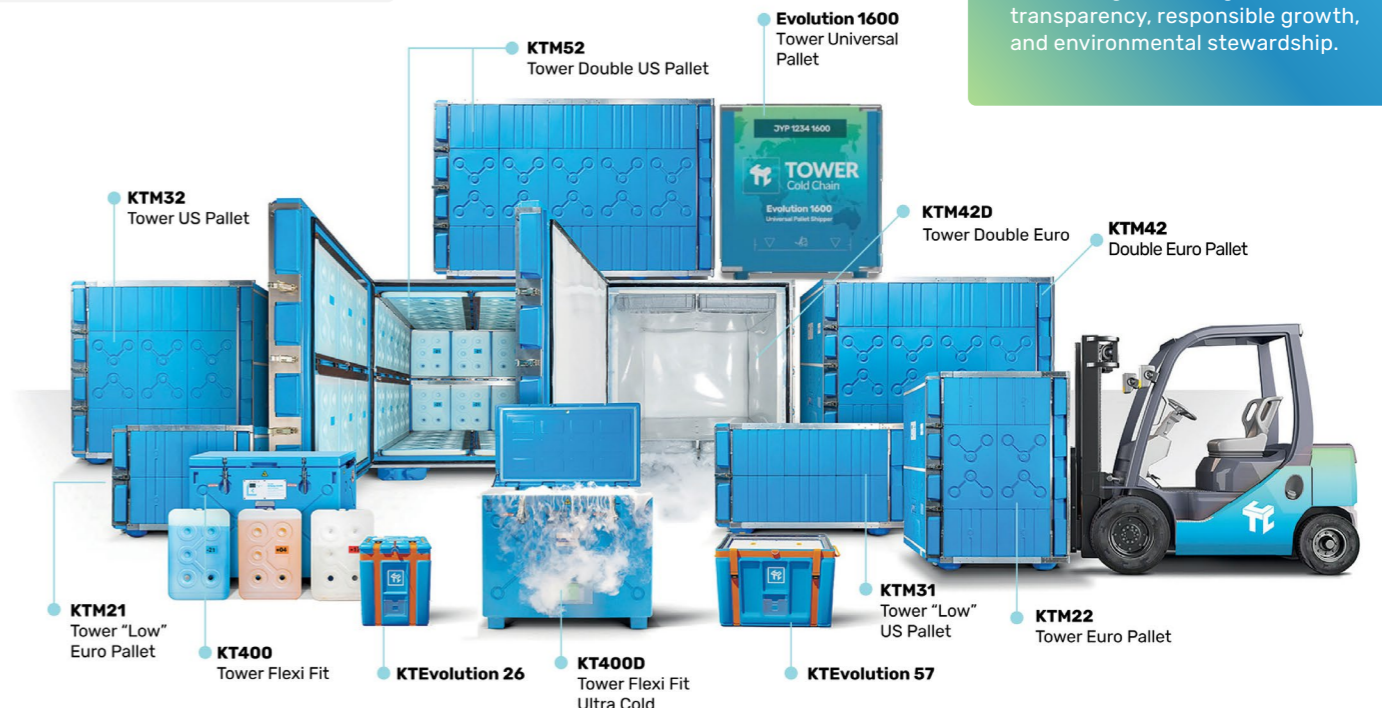
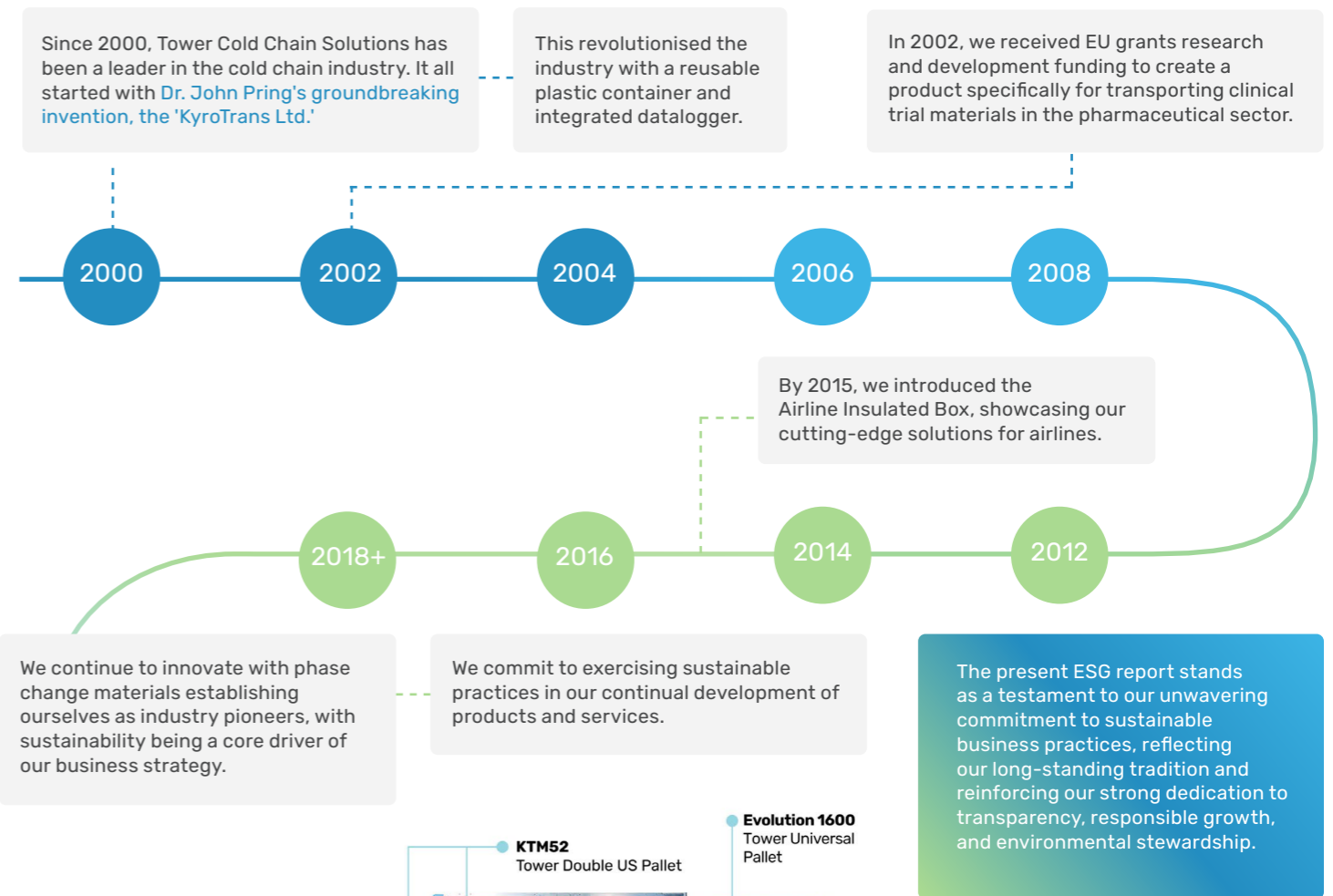
In 2021, we attained the EcoVadis Bronze Medal, a testament to our dedication to sustainable practices. Within just 12 months, we elevated our standing to the prestigious Silver Medal. The goal of the Gold Medal now stands within our grasp, a vision we believe is achievable in the next few years since we embraced the challenge of this globally admired and respected accreditation.

I invite you to explore our Sustainability Report. I trust you will find it informative and illustrative of why Tower Cold Chain is an emerging leader in the industry.

Niall Balfour,
CEO of Tower Cold Chain

About Us

OUR TRAJECTORY



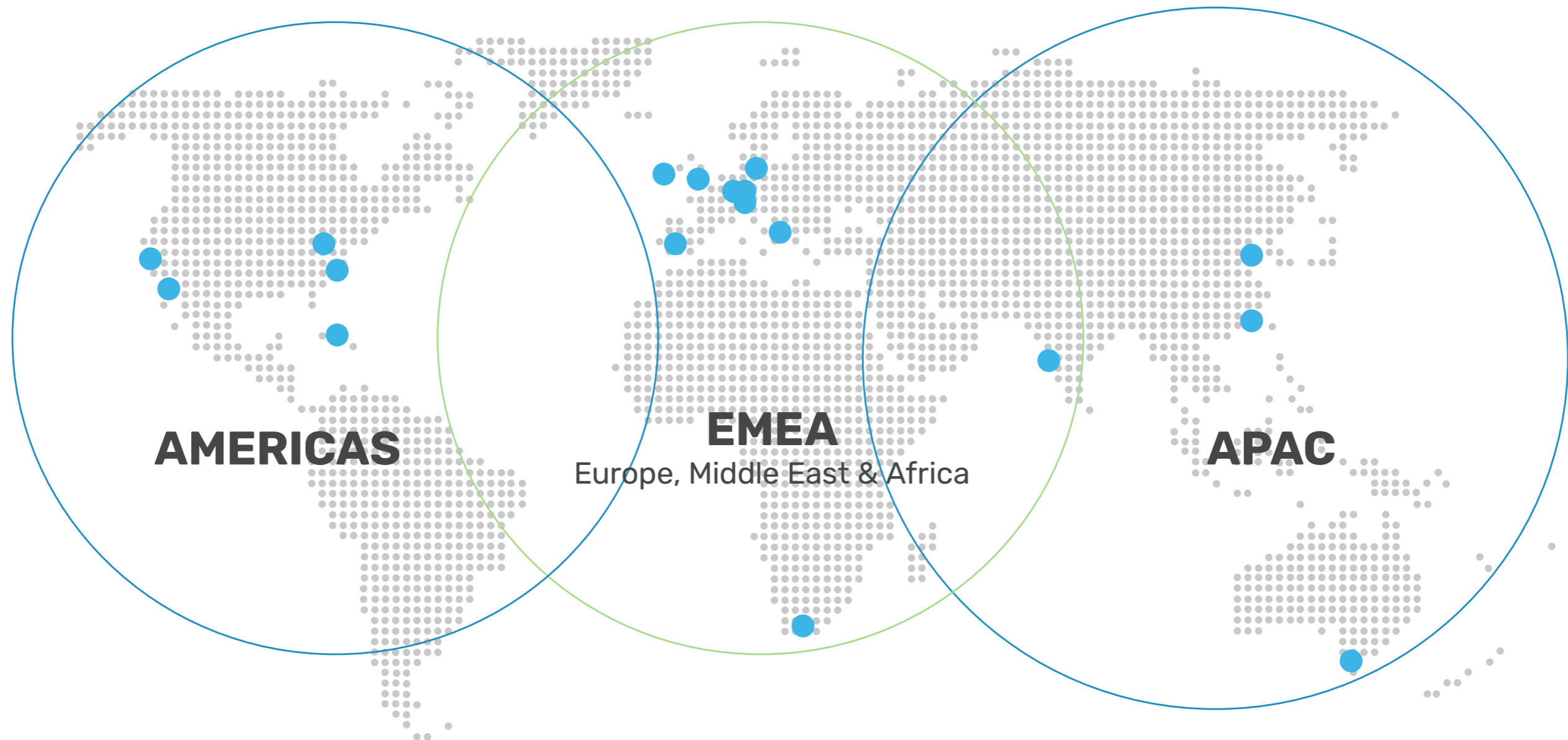
TOWER Cold Chain (owned by CT2 Holdings Ltd), is a limited company with its headquarters at Unit A, Total Park, Station Road, Theale, Reading, Berkshire RG7 4PN, UK. The company is registered in the UK and also operates in Europe, APAC and the United States, employing around a 100 employees worldwide.

International Reach

Our company boasts a global presence with **three Center of Excellence strategically located in the United Kingdom, United States and Singapore**, providing easy access and global availability to our products and cold chain technology for multiple markets.

These key operational hubs allow us to effectively serve clients across the globe and cater to their diverse needs.

Our global support structure ensures our customer base has 24-hour availability to our services so we can meet our customer needs whenever, and wherever they are.

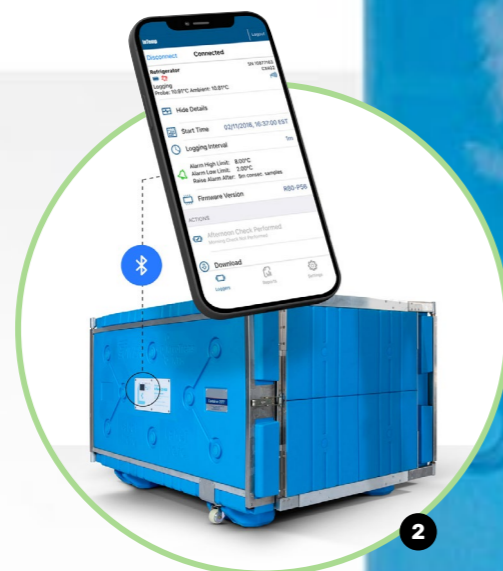
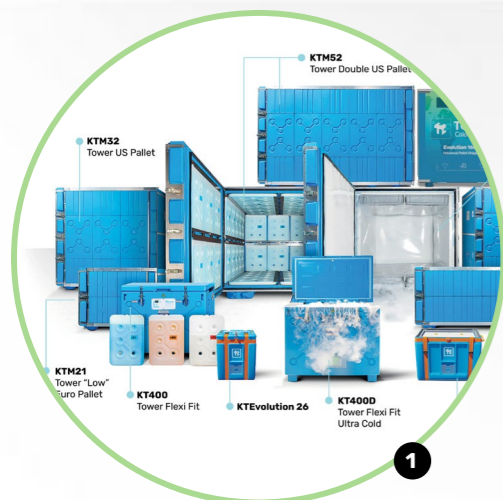


Our Business Model

Cold chain logistics and management are more complex and more in demand than ever before. We understand that supply chains can be lengthy and interconnected.

Our products can play a crucial role as part of a robust and efficient supply chain delivering temperature-sensitive pharmaceutical products.

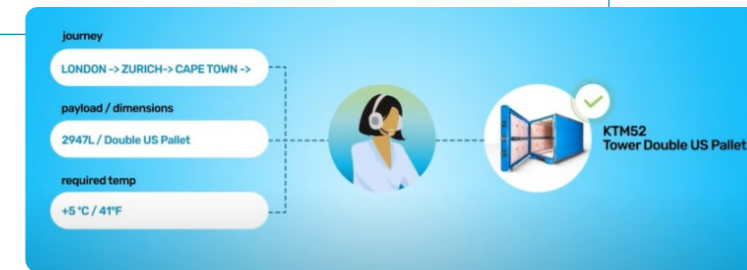
Our unique range of containers¹ are designed to fulfil our customer's range of challenging supply-chain needs.



Tower's passive containers can be pre-conditioned at the established pharmaceutical cold-chain temperature ranges from **-80°C to refrigerated +5°C**, and extended to **controlled room temperature of +25°C**.

Preconditioning ensures **efficient and rapid on-site handling**. Our technical teams work closely with customers to optimise both the handling and the payload capacity.

The Tower team of experts focus on collaborating with customers to **identify the right temperature-controlled solutions for their requirements**.



Once loaded and dispatched, none of our solutions require further intervention, which **mitigates supply chain risk and potential product tampering**.

All containers meet the **industry performance standards set by the International Safe Transit Association (ISTA)**.

Adhering to these standards is crucial for maintaining high-quality standards in the healthcare and pharmaceutical industries, providing a **minimum of 120 hours temperature compliance in any environment, anywhere in the world**.

All our containers are integrated with **state-of-the-art data-logging technology²** providing customers with **full supply-chain temperature compliance checks from dispatch, in transit, and through to product offload**. Performance data demonstrates less than 0.1% temperature excursion.

Tower also helps its customers with their sustainability journey by offering **containers that are reusable, providing a circular solution aimed at reducing waste**. We cater for a range of challenging environments and are sensitive to various sectoral expectations and requirements.

Governance Structure

Tower as a worldwide organisation and a privately owned company implements a consistent approach for consolidating information for this report.

Two trading entities are included in the sustainability reporting. All other entities in the financial statements are non-trading companies.

OUR APPROACH

The Tower Board is dedicated to upholding corporate governance standards and policies. Board members prioritise sustainability and ensure that all decisions align with the company's mission and values.

Tower's Board and governance rules are laid out in its Corporate Governance Charter. This Charter covers three core pillars of corporate governance: governance principles and objectives, Board accountabilities and Committee matters, and methods of monitoring. In compiling this Charter, the Tower Board has aligned its approach to the 'ecoDa Governance Guide and Principles for

Unlisted Companies in Europe', version March 2021.

These defined principles reflect the cornerstones of Tower's governance and act as a supporting structure for our long-term company strategy, as well as day-to-day management of both financial and non-financial performance. A responsible approach to business decision-making, the realisation of the Tower stakeholders' long-term value, as well as conscious awareness of and responsibility for environmental and social impact, are all outcomes driven and upheld by the Governance Charter.

- Code of Conduct
- Whistleblowing Policy
- Bullying and Harassment policy
- Diversity, Inclusion & Ethics Policy

RESPONSIBLE GOVERNANCE POLICY

Tower Cold Chain maintains the following policies in relation to responsible governance and ensures all policies and guidelines are accessible to all staff in an Employee Handbook:

Our Governance Charter

Governance principles and objectives

Tower is committed to conducting all of its business to the highest ethical standards, in an environmentally and socially responsible manner. The following defined principles reflect the cornerstones of the company governance and add structure to the long-term strategy as well as day-to-day management.

Corporate purpose

The purpose of Tower is to be a dynamic and profitable company that creates value for all its stakeholders.

Our stakeholders are: Customers, Employees, Shareholders and Suppliers.

Corporate culture and values

In the light of its long-term corporate purpose Tower strives to create and maintain a respectful, inspiring and motivating working environment, that enables management, Board Members and employees to fulfil their role in a meaningful way.

We take into account a healthy balance between individual goals, company objectives and the stakeholders' long-term value.

Sustainability and diversity

In the process of and approach to business decision-making, the realisation of the Tower stakeholders' long-term value, as well as conscious awareness of and responsibility for environmental and social impact will be incorporated.

Checks and balances, Professional decision-making and Accountability

Clear procedures subject all decision-making to an objective accountability. Within Tower, levels of hierarchy and accountability are defined with matching responsibilities and powers.

Proper oversight by the Non-Executive Board (NE Board) is realised by a good reporting and control framework and guarantees an effective and efficient functioning of the system of hierarchy.

Discussions are made in an open and respectful atmosphere, well documented including perspectives and (differing) viewpoints, followed by decisive action.

Due care is taken over the choice of NE Board members, and that all necessary skills and competencies are fulfilled.

Transparency

By taking constant care to maintain a system with clear checks and balances and objective accountability Tower safeguard a transparent organisation and an environment that encourages high standards of behaviour by its management and employees.

Remuneration policy

A credible, transparent and well-balanced remuneration policy is a vital part of Tower incentives to create and maintain a motivating working environment. That contributes to the commitment and loyalty of company stakeholders – such as management, employees, investors and shareholders – to the company's objectives.

About This Report

Tower Cold Chain has published this report in order to disclose transparently to its stakeholders its current performance and forward-looking commitments as part of our company sustainability strategy.

To this end, the identified stakeholders include customers, suppliers, employees, shareholders, research partners, and other interested parties, and not limited.

The report has been developed in collaboration with an independent sustainability consultancy firm, ClearVUE.Business.

It encompasses information for both entities under the CT2 Holding Ltd group, namely Tower Cold Chain Solutions and Tower Cold Chain Inc.

For enquiries or for further information about this report, please get in touch with the Tower Cold Chain ESG Committee:
web.marketing@towercoldchain.com



Reporting Period and Framework

This report published in March 2024 aligns with the Company's fiscal year spanning from **October 2022 to September 2023**

In line with transparency and accountability, the report is conducted with reference to the [Global Reporting Initiative Framework \(GRI\)](#).

All identified material topics have been addressed in this report, ensuring a thorough and informative assessment of Tower Cold Chain's management of these operations and business activities.

We have also reported our approach to the management of climate-related risk and

opportunity assessments, and associated performance in these areas with reference to the recommendations of the [Taskforce on Climate-related Financial Disclosures \(TCFD\)](#).

The GHG emissions data calculation for this first reporting year was conducted in accordance with the [GHG Protocol Corporate Accounting and Reporting Standard, Revised Edition \(2015\)](#).

Our Vision

To be a provider-of-choice of temperature-controlled solutions to the global pharmaceutical and life-science industries.

Our Mission

To be a dynamic and profitable company that creates value for all its stakeholders through innovation, regulatory compliance, and sustainability.

Our Culture

Innovation, Accountability, Collaboration, Sustainability.



Sector Overview

Cold Chain Logistics as a sector is presented with a number of **significant sustainability-related challenges** due to the requirements of the supplied goods and services:

Energy consumption

Refrigeration accounts for a large portion of energy use in this sector, leading to high direct and indirect GHG emissions.

Finding ways to reduce energy and refrigerant consumption without compromising the integrity of temperature-sensitive goods is crucial.

Product spoilage

Temperature variations during transportation and storage can result in spoilage and unnecessary waste.

Packaging waste

Packaging materials used to insulate and protect perishable goods can generate significant waste.

Developing eco-friendly packaging solutions that maintain product quality while reducing environmental impact is essential.

Transport pollution

Transportation vehicles used in the cold chain often run on fossil fuels, contributing to GHG emissions and particulate air pollution.

Transitioning to cleaner energy sources or more efficient transportation methods is a priority.

Supply chain transparency

Lack of transparency in the supply-chain makes it challenging to identify risks, inefficiencies, and areas where improvements could be made.

Implementing better tracking and monitoring systems can aid in optimizing processes and reducing waste.

Addressing these challenges requires innovative technologies, improved infrastructure, collaboration across the supply chain and a concerted effort to adopt sustainable practices at every stage of the cold-chain logistics process.

Materiality Assessment

Aligning our business strategy with our ESG strategy ensures that we develop a deeper understanding of the sustainability-related risks and opportunities to our business and stakeholders.

We understand that any credible ESG strategy starts with understanding what is material to our business, as this enables us to focus on the most significant areas of real-world positive impact.

Aligning our business strategy with our ESG strategy ensures that we develop a deeper understanding of the sustainability-related risks and opportunities to our business and stakeholders. It also assists us establish a roadmap tailored to our business activities where we can continuously identify opportunities contributing to a more resilient and responsible business model.

In partnership with the consultancy company ClearVUE.Business, we conducted our first top-down materiality assessment applying the principles of double materiality. A fundamental first step in the assessment was mapping out our most important stakeholder groups and the communication channels which are actively utilised by the management team for continual feedback and analysis.

The assessment then consisted of both the ESG Committee and Senior Leadership Team rating the level of risk that various ESG topics presented both to enterprise value (financial materiality), and the level of risk associated with the natural and social environments in which the company operates (impact materiality).

OUR STAKEHOLDER GROUPS

Stakeholder group	Communication channel
Customers/End users	Feedback from sales team, purchase trends, customer feedback
Employees	Dialogue with managers and employees, recruitment and exit processes, staff feedback surveys
Suppliers	Supplier surveys, regular feedback and negotiation
Potential future employees	Market research, eligibility criteria for finance, investor feedback
University/External research partners	Joint research projects with UK universities
Civil society	Market research, industry events, public trends, NGOs

Results of Materiality Assessment

This first assessment drew on the insights and experience of the management teams, which resulted in ESG topics being categorised as: negligible, not very material, moderately material, material, or highly material.

Further analysis of these grouped topics lead to the identification of 22 subtopics for incorporation into the Tower Cold Chain ESG Strategy (see page 18).

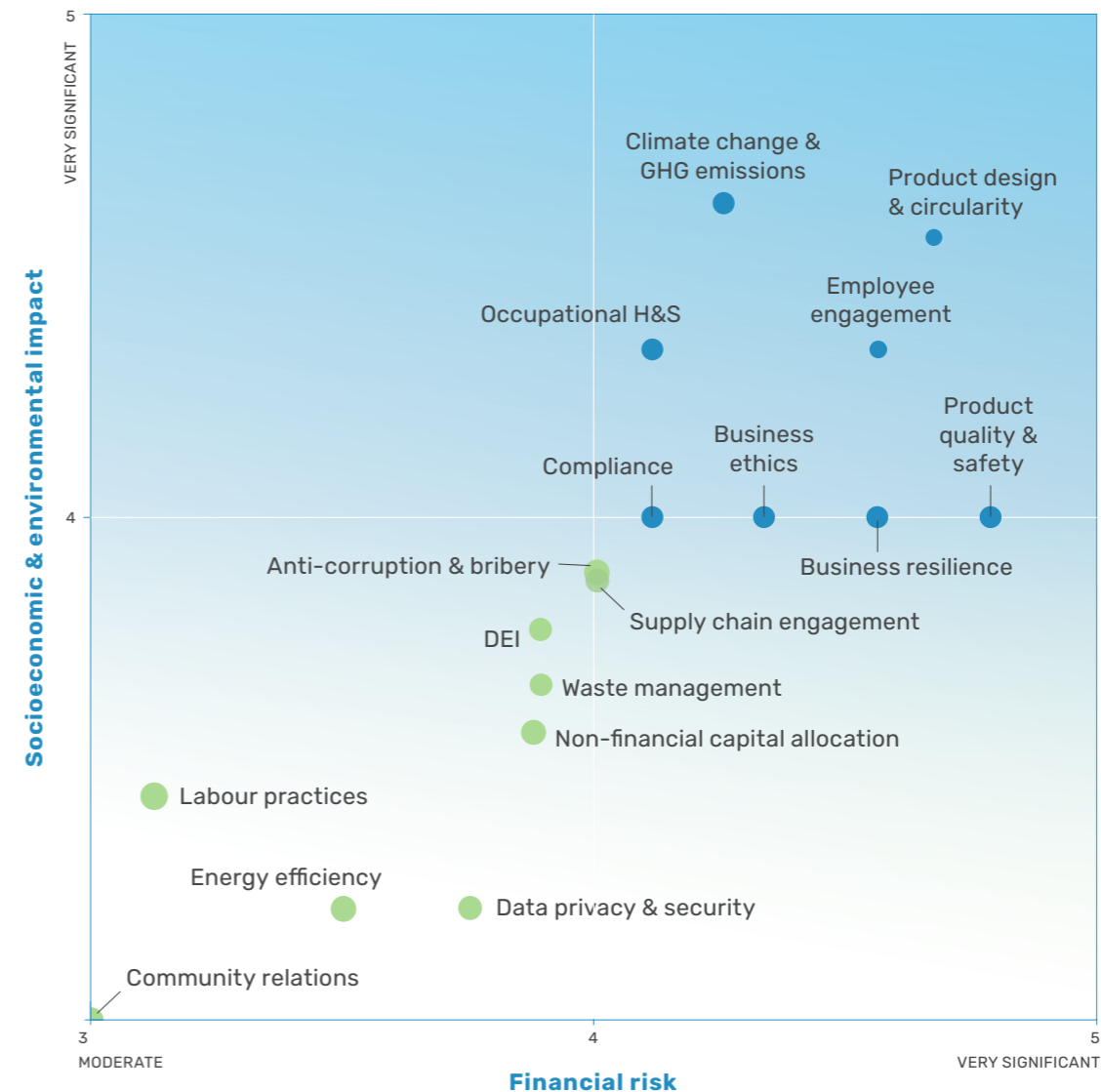


FIGURE 1 Results of materiality assessment. The circle size represents the level of agreement between stakeholders: the smaller the circle, the greater the agreement.

Our Material Topics

Tower Cold Chain commit to monitoring and reporting on the following identified material topics.

Our aim is to conduct a bottom-up materiality assessment in the next reporting year with external stakeholder groups.

Over time, the most salient material topics may shift due to the dynamic nature of materiality depending on stakeholder interest, goods and services, and cultural shifts.

Tower Cold Chain intend to commit to regular materiality assessments to ensure our focus areas remain relevant and impactful.

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Product Innovation, Development & Circularity PAGE 34

Continuous process of creating and improving products with a focus on sustainability, resource efficiency, and the integration of circular economy principles to minimise environmental negative impact.

Climate Change & GHG Emissions PAGE 42

Greenhouse gas emissions from industrial sources are a major contributor to climate change and must be reduced in line with national and international targets

Water Management PAGE 48

Systematic planning, conservation, and distribution of water resources to meet societal need, ensuring sustainable use and addressing challenges such as scarcity, pollution and efficient allocation of the water resource.

S

Employee Engagement PAGE 52

Internal practices for employees' emotional commitment, motivation and dedication to their work, reflecting a positive and productive connection between individuals and their organisation.

Community Relations PAGE 66

Entails the establishment and maintenance of positive connections between organisations and the communities they operate in, fostering mutual engagement and collaboration for the benefit of both parties.

Diversity, Equity & Inclusion (DEI) PAGE 62

Collective commitment to recognising and embracing differences, promoting fair opportunities, and fostering an inclusive environment that values and respects individuals from varied backgrounds, ensuring everyone feels a sense of belonging.

Data Privacy & Security

Safeguard of sensitive information that is personal or confidential, ensuring that data is protected from unauthorised access, breaches and misuses, thereby, maintaining individual rights and organisational integrity.

G

Supply Chain Engagement PAGE 30

Active involvement and collaboration of all stakeholders in the value chain, in the optimisation of processes, communication and relationships to enhance efficiency, sustainability and overall performance within the supply chain.

Business Ethics PAGE 27

Application of moral principles and values in the conduct of business activities, guiding responsible decision making and promoting integrity, fairness and social responsibility within an organisation.

ESG Strategy

In the pursuit of sustainable and responsible business practices, the United Nations' Sustainable Development Goals (SDGs) have emerged as a universally-recognised agenda with which companies can link their business activities and forward-looking statements.

We have aligned our ESG strategy with the UN's SDGs.

The SDGs represent a comprehensive set of global goals addressing key social, environmental, and economic issues, providing a roadmap for businesses to contribute positively to sustainable development.

By integrating the relevant goals of the SDGs into ESG strategy development, businesses can not only enhance their environmental and social impact but also foster long-term resilience and real-world positive impact.

The table to the right summarises Tower's material topics and their direct and indirect impacts on the achievement of Sustainable Development Goals (SDGs). While not all measures in our ESG strategy directly address every SDG, some have spill-over effects on other goals.

Direct impacts target specific SDGs through best practice implementation, while indirect impacts affect other SDGs without explicitly addressing them.

A holistic approach fosters comprehensive and integrated efforts toward sustainable development, acknowledging interconnections between goals and the need for coordinated action across sectors and stakeholders.

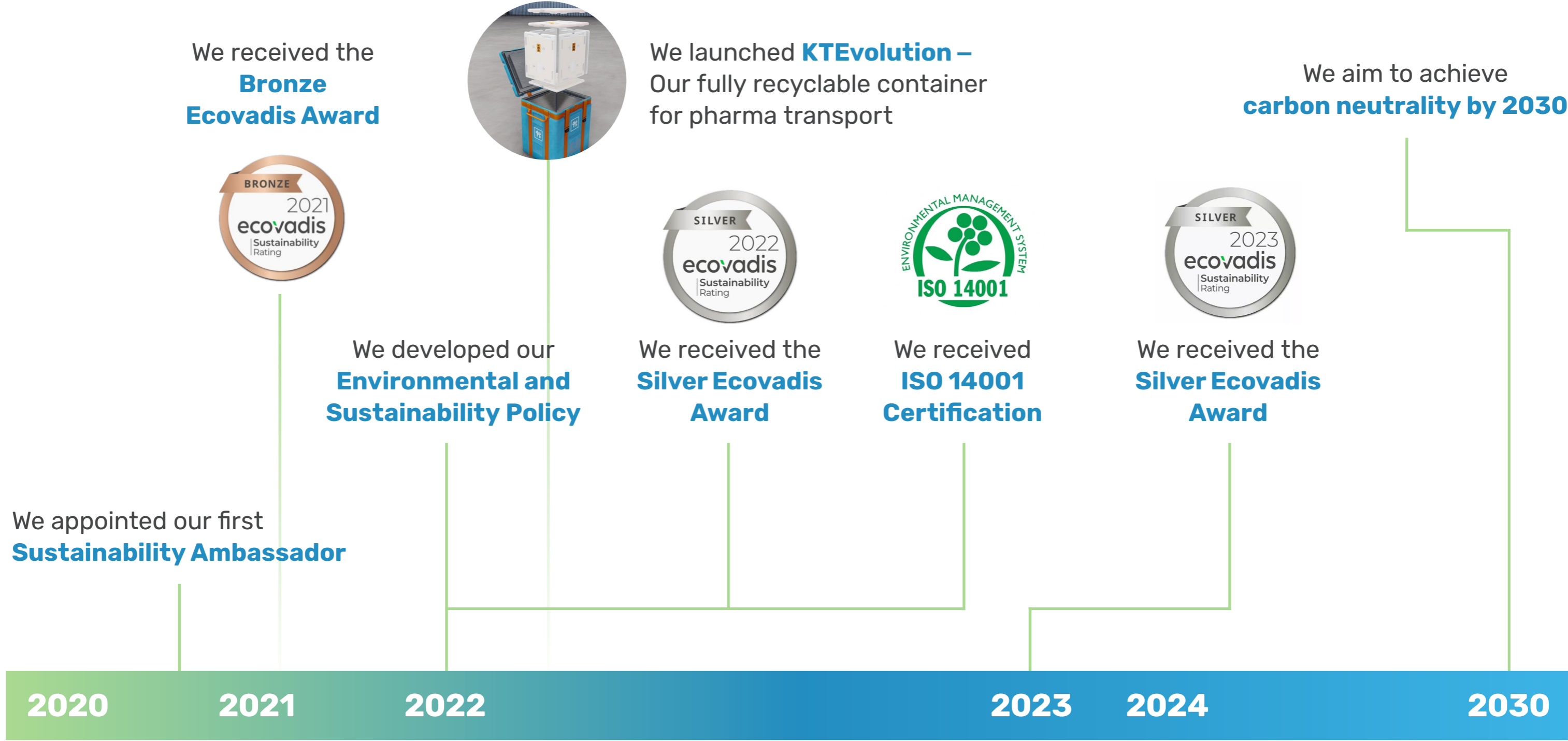
For a detailed view of the UN's Sustainability Development Goals and how they are addressed by Tower's ESG strategy, see the [appendix in page 83](#).

SD Scopes	Material topics	Direct impact	Indirect impact
Environmental	Product innovation, development & circularity	7 9 12 13	6 17
	Climate change & GHG emissions		
	Water management		
Social	Employee engagement	5 8 10	3 4 17
	Diversity, Equity & Inclusion (DEI)		
	Community relations		
	Business ethics		
	Data privacy & security		
Economic	Supply chain engagement	17	7 10 12 13 14 15



FIGURE 2
Diagram highlighting the Sustainable Development Goals (SDGs) impacted directly and indirectly by Tower's material topics

Our Sustainability Roadmap



ESG

GOVERNANCE

Our Approach

A key component of Tower Cold Chain governance of ESG matters is an ESG committee, drawn from employees across the organisation, who meet monthly and report their discussions to the Board.

Tower Cold Chain have established leadership and management teams to assess and manage all ESG-related risks and opportunities through internal communication forums. A cross-functional ESG Committee comprised of senior leaders, department managers, team members, and a Board member ambassador, meet on a monthly basis to bring together key insights across the business in relation to the risks and opportunities associated with material topics.

Additionally, the senior leadership team meet bi-weekly to review the day-to-day management and progress of business, with a specific monthly spotlight focused on addressing challenges to current and future sustainability strategies.

The Audit and Risk Committee is composed of members from both the Board and management team. They meet on a quarterly basis to exercise oversight and assist the business to implement effective internal controls and risk management. They maintain a risk and opportunity register, which helps track and manage potential impacts to the business and its environment.

The leadership and management teams are tasked with communicating any required action or information which needs to be notified to the ESG Committee for adaptation to ESG management practices. All meetings in these forums are minuted and circulated across the governance teams.

Business Ethics

COMPLIANCE

Tower Cold Chain prioritise compliance, recognising the importance in ensuring adherence to applicable laws and regulations. In a business landscape where regulatory scrutiny continues to increase, Tower Cold Chain's compliance record highlights our commitment to transparency, accountability, and good governance. This helps foster trust among stakeholders and supports the overall sustainability of our operations.

The Audit & Risk Committee quarterly meetings supports company compliance activities and assists with the evaluation of risk exposure and the risk management function of the company. The absence of non-compliance cases indicates that Tower Cold Chain has established effective management systems and processes to monitor and ensure adherence to legal requirements. It reflects positively on the company's ability to identify and address potential compliance

issues, thereby minimising the risk of penalties, sanctions, or legal actions. **Tower are committed to upholding a zero incident rate of non-compliance across all operations.**

Number of non-compliance incident across all operations

0

ANTI-CORRUPTION AND BRIBERY

Our goal is to achieve comprehensive awareness training on anti-bribery and internal policies for all our employees, emphasizing our commitment to fostering a culture of integrity and compliance.

Our company is committed to conducting business ethically and with integrity. Every individual and organisation that acts on the company's behalf is responsible for ensuring that this principle is upheld by adhering to our anti-bribery policy.

Further, the Company conducts all business in an honest and professional manner and in line with The Bribery Act 2010. Tower Cold Chain define bribery as the form of a direct or indirect financial payment or other reward or advantage to encourage an individual or organisation to perform their functions or activities improperly, or as a reward for having already performed their functions or activities improperly.

Any individual or organisation acting on behalf of the Company is strictly prohibited from offering, promising, giving, requesting, agreeing to receive or accepting any bribes or undisclosed incentives.

Tower have implemented a whistleblowing policy where employees have a duty to report known breaches of the Company's rules or illegal practices, and will be protected from any detriment as a result of reporting any incidents.

We also expect our vendors, consultants, contractors, affiliates and joint venture partners, and anyone else who supplies to or acts on behalf of Tower, to comply with all applicable national and international laws and recognised industry codes of practice. This includes not engaging in, and immediately reporting, any activity which might be considered to constitute bribery or corruption, or might otherwise be unlawful.

Our Code of Conduct is the foundation of our policies, processes and training to promote awareness and ensure our agents, contractors, suppliers and business partners also adhere to these same principles. Since the company's founding, no incidents related to corruption have been reported by or communicated to Tower staff. This is a positive reflection on our organisation's commitment to maintaining integrity and ethical practices. It is crucial to continue fostering a culture of transparency and accountability to prevent corruption from taking root.

By implementing robust anti-corruption measures, promoting ethical behaviour, and providing regular training and awareness programs, we strengthen our defence against corruption. Our policies and procedures related to anti-corruption and bribery have been communicated to the Board of Directors and our employees worldwide, and publicly available on our website.



Tower continuously exercise due diligence processes for slavery and human trafficking and have implemented policies and systems across our business to mitigate risk in these areas.

We expect our trading partners and our supply chains to:

- ✓ Identify inappropriate employment practices
- ✓ Identify, assess, and monitor other potential risk areas
- ✓ Mitigate the risk of slavery and human trafficking occurring
- ✓ Protect whistleblowers
- ✓ Investigate reports of Modern Slavery

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant training to our colleagues. Under our Supplier Code of Conduct we also require our business partners to provide regular and relevant training to their staff and suppliers, and ensure commitments are in place to respect all relevant policies.

Due to the nature of our business, we have assessed ourselves to have a low risk of Modern Slavery in our business.

As a company however we are still committed to embedding responsible principles of commercial activities with the following activities:

1. Provide awareness training to staff on the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.
2. Ensure consideration of the modern slavery risks and prevention are added to our policy review process as both an employer and procurer of goods and service.
3. Ensure our procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
4. Continue to take action to embed a zero-tolerance policy towards modern slavery.

We commit to reassessing our supplier agreement to guarantee supplier awareness and adherence to Tower policies on child labour, human trafficking, slavery, and sustainability, with the goal of achieving 100% commitment among our suppliers.

Additionally, we pledge to conduct a comprehensive risk assessment for all our crucial and bottleneck suppliers, demonstrating our ongoing commitment to maintaining resilience and high standards across our supply chain.

Supply Chain Engagement

Tower understand that a significant level of environmental and social risk can exist across the company value chain and are therefore committed to ensuring there is supplier adherence to Tower's values and business ethics.

All Tower suppliers, hubs or manufacturers, and third party logistics companies are risk assessed and audited for approval as per the Tower supplier management procedure. Critical supplier performance is reviewed annually and audited in the event any potential or actual performance issue arises.

NON-FINANCIAL CAPITAL ALLOCATION

Within the Board's corporate governance charter, a sub-committee, the Audit and Risk Committee, review and monitor the organisation's financial sustainability, and potential or actual impacts on the natural and social environments in which we operate. This sub-committee integrates management feedback into all decision-making processes which involve non-financial capital allocation for driving change.

The Audit & Risk Committee consist of a team drawn from both board and management staff. The committee meets quarterly and produces an annual review shared at board level. Amongst other activities, the committee maintain a risk and opportunity register to track potential impact to the business and its environment.

The committee is responsible for reviewing and monitoring the company's impact on the economy, environment, and its people.

This committee take into account any recommendations from leadership and management regarding changes that need to be made to the management strategy, and allocation of capital required in order to improve performance in ESG-related areas.

ENVIRONMENTAL SCREENING

Tower currently screen all new critical suppliers to ensure they are not at risk of environmental non-compliance and significant negative environmental impacts. All critical suppliers must have an environmental management system in place. All new critical suppliers, approximately 20% of new suppliers, have been screened with no significant negative environmental impacts identified. Tower's existing suppliers are also screened for environmental inefficiencies or opportunities for more environmentally responsible business activities.

This assessment identified 'rotomoulding' as the highest energy consuming process in the manufacturing of our products. Rotomoulding involves melting plastic, typically in a gas-fired oven, to produce the outer container walls, body, lid and doors of our containers. Our supplier switched to an electric heating method, resulting in a 20% reduction in energy usage per product. Assessments of this kind have encouraged positive changes in 10% of the companies that we have categorised as critical suppliers to Tower Cold Chain.

Our goal by the end of 2024 is to have established new procurement criteria and integrated geographic proximity into formal supplier assessment.

New critical suppliers that have been screened

20%

Screened new critical suppliers that have been evaluated to have no significant negative environmental impact

100%

Critical existing suppliers that have optimised manufacturing processes through screening

10%

SOCIAL SCREENING

We have zero tolerance to slavery and human trafficking. Tower currently screen new and existing critical suppliers to ensure these suppliers are not at risk of breaching any human rights or labour laws, or at risk of significantly contributing to any negative social impacts.

As part of the selection and onboarding process, all suppliers must have a code of conduct in place which covers labour standards, human rights and business ethics. All critical suppliers across the supply chain have been screened with no significant impacts identified.

We are dedicated to overseeing suppliers, through monitoring activities to minimise negative environmental and social impacts in our supply chain. Through ongoing evaluation and collaboration, we aim to maintain high standards and drive positive changes.

Critical suppliers that have been screened with no significant negative social impact

100%

ESG

ENVIRONMENT

Product Innovation, Development & Circularity

CIRCULARITY

Every new development in our portfolio follows the **principles of circular economy**, from eco-design to the end-of-life stage.

Our strategy promotes **reusability, repairability, and recovery** across our global network.

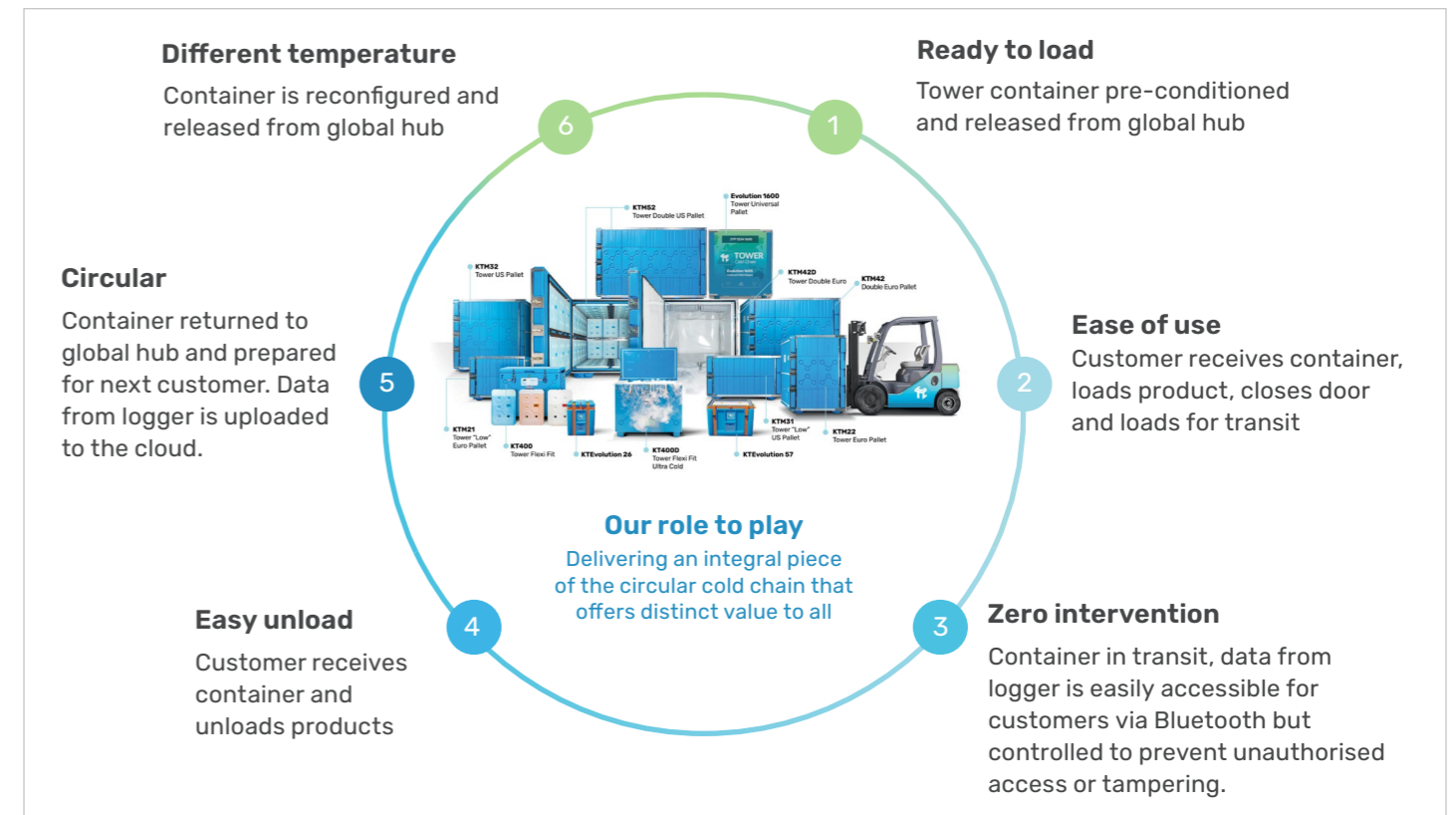
Tower's primary objective in adopting this strategy is to minimise any negative environmental impact through reduced consumption of raw materials and reduced waste. Our key focus when developing new products are product circularity and weight reduction (while maximising payloads).

We foster circularity through a leasing business model (servitisation) (Figure 3), contributing to more sustainable business practices as customers can avoid purchasing and discarding containers and packaging through one-time usage. Instead, they can access ongoing rental services for our solutions.

Keeping our reusable products in circulation through upgrades and regular maintenance extends product lifecycle, thereby reducing waste.

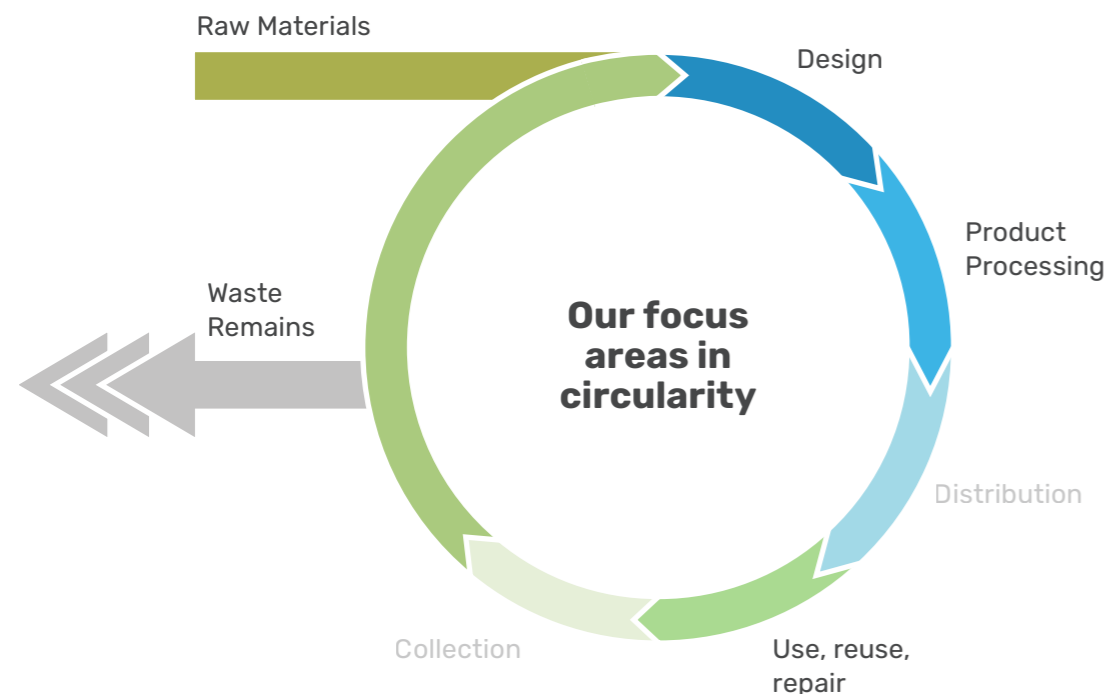


FIGURE 3 Circularity through servitisation



Tower have taken several noteworthy actions to achieve their circularity goals, including:

- ✓ Prioritising weight reduction in all upcoming product releases, thereby minimising resource usage and transportation GHG emissions
- ✓ Optimising transport routes with servitisation to ensure circularity and mitigate unnecessary shipping expenses
- ✓ Consistently partnering with sustainability-conscious collaborators for the outsourcing of regional operational functions, thereby consolidating efforts towards sustainability goals



SOME FACTS

In 2022 Tower introduced the **KTEvolution range of reusable containers**, aimed to disrupt a commoditised single-use solutions market. This solution is designed to **meet traditional weight to payload demands from the pharmaceutical sector whilst maintaining our goal to reuse our containers.**



In late 2023 Tower launched the **Evolution1600, the lightest fully-reusable passive pallet shipper**. With a "Universal" design it eliminates any need to re-position empty containers which are compatible with specific markets only, resulting in **minimised GHG emissions across our operations.**



By 2025, we aim to **monitor and record the quantity of non-renewable and renewable materials obtained and used as inputs.**

Our focus will be on establishing a method to **repurpose at least 25% of plastic and metal materials from single-use containers to create new containers by 2030.**

WASTE MANAGEMENT

At our company we have implemented robust procedures to effectively manage our assets, with a strong focus on minimising waste and maximising asset lifespan.

When our containers are reported damaged, we take immediate action by conducting thorough inspections to assess the extent of the damage.

This process is seamlessly executed using our online tracking system that assigns a unique serial number to each container. In the case that a container can be repaired, we

prioritise its reintroduction into the supply chain in favour of scrapping the product. Our training programs for our repair process at our global centres aim to reduce damaged empty units being returned to our HQ. If repair is not feasible, we aim to maximise the recovery of parts.

Our teams across our Centers of Excellence carefully disassemble the containers to salvage valuable components such as metal parts, fittings, doors, and lid seals.

These components are meticulously evaluated to ensure they meet our quality standard and are returned to our stock as spare parts for maintenance or repair of other containers.

For materials that cannot be directly reused, such as blue plastic parts, polyurethane, and PCMs (phase-change materials). Tower ensure they are handled responsibly by waste management experts. Depending on their properties, plastic parts are recycled into pellets, while polyurethane is utilised as fuel energy in cement kilns belonging to third parties.

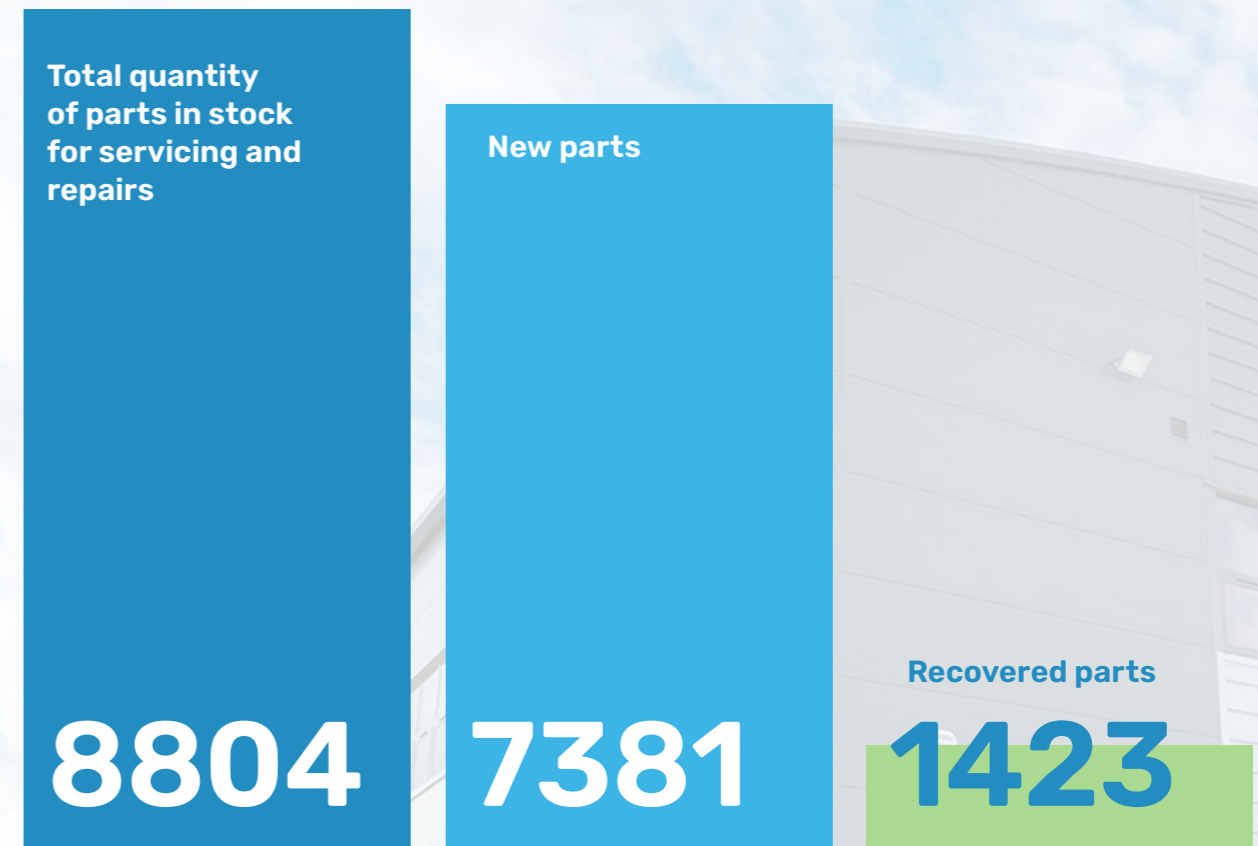
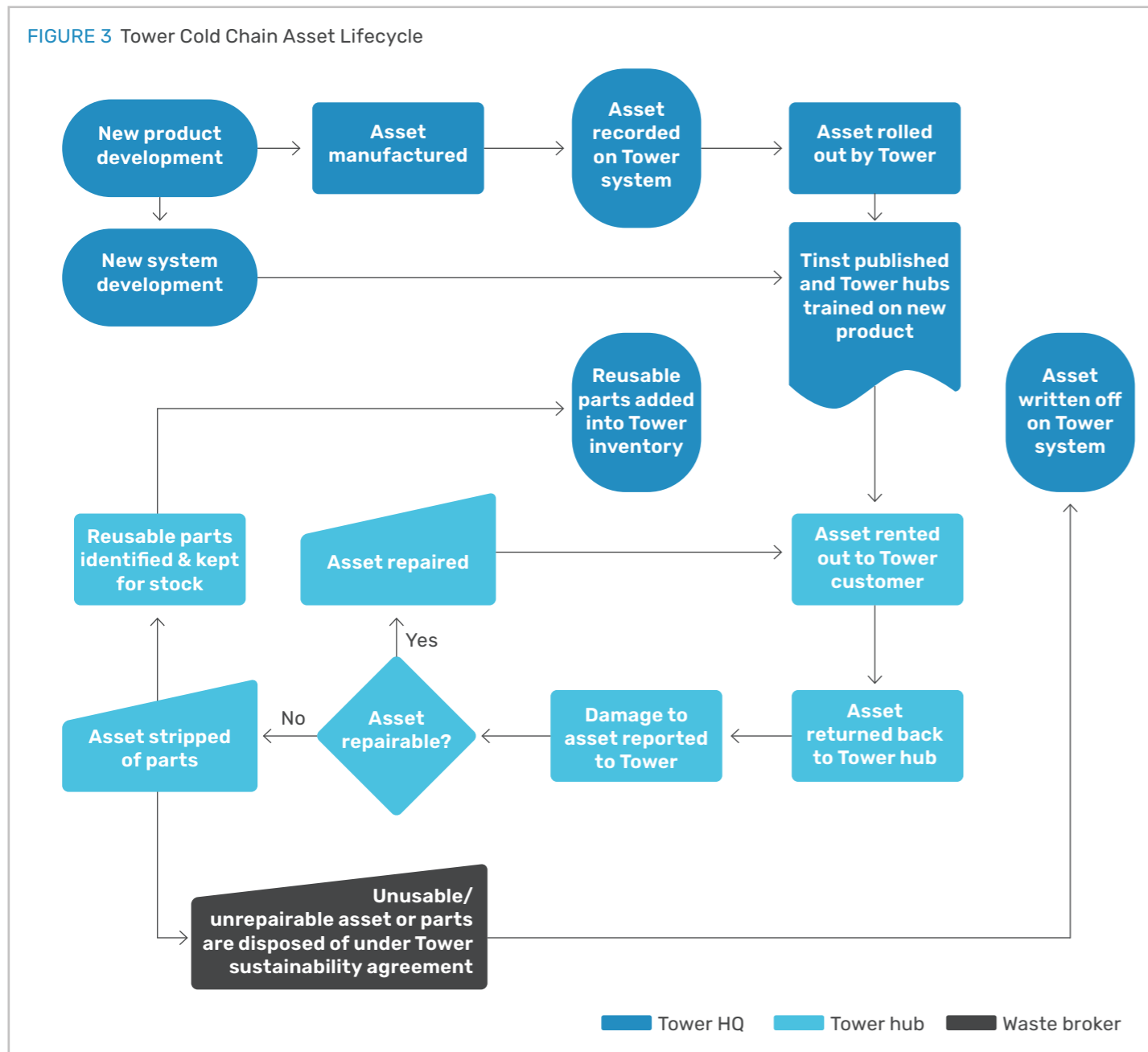
By adopting this approach, we prevent our products from ending up in landfill and these components are given new life, contributing to a more circular and responsible supply chain.

Tower ensure that all third parties managing waste from business-related activities offsite hold appropriate environmental licenses.

We are committed to recording the movement of damaged units, with a target of damaged unit shipments to account for less than 10% of our inventory movement by 2030.

Our goal is to uphold our long-standing 100% compliance record with all regulatory waste management requirements and ensure our practices are validated by annual audits.

FIGURE 3 Tower Cold Chain Asset Lifecycle



We prioritise the safety of our products, striving to maintain a consistent zero-incident record of non-compliance with health and safety regulations.

Our aim is to have established criteria for assessing the health and safety impacts of product and service categories available for the upcoming EcoVadis assessment in September 2024.

We are proud to announce that we have maintained a perfect record of compliance, with zero incidents of non-compliance with regulations concerning the health and safety of our products and services. This achievement is a result of our rigorous assessment process, where all our products undergo thorough evaluations for health and safety impacts.

Our commitment to ensuring the highest standards of safety and compliance remains unwavering. Tower Cold Chain are dedicated to delivering products and services that fully satisfy the needs of our customers and other interested parties. Aligned with our core values and business strategy, our primary goal is to consistently achieve a high level of customer satisfaction and safety by providing exceptional service and exceeding expectations.

To support this objective, we have implemented and received **independent certification for a Quality Management System as part of the Tower Integrated Management System (TIMS), which adheres to the requirements of ISO 9001:2015.**

Our commitments to quality are:

- To ensure that both customer requirements and relevant statutory and regulatory obligations are thoroughly identified, understood, and consistently met.
- To adopt a flexible approach to meeting these requirements, applying a positive "can do" attitude, and leveraging our extensive knowledge of the marketplace in which we operate.
- To continuously improve our Quality Management System by identifying and addressing risks, opportunities, and factors that may impact the conformity of our products and services. We remain focused on enhancing customer satisfaction throughout this process.



Climate Change & GHG Emissions

ENERGY EFFICIENCY

We understand that improving energy efficiency is not only fundamental in maintaining competitive operative cost. It is a collective responsibility for all businesses to ensure that global resources are managed well and GHG emissions are reduced to a minimum.

Company offices have LED lighting in all new sites with office lighting connected to timers. Whilst warehouse lighting is on manual controls, staff across all sites are trained in energy efficiency practices. Air-conditioning equipment and gas boilers are serviced regularly to ensure that optimal energy consumption is established across all operations.

As a commitment to clean energy, we are pleased to announce our recent partnership with Custom Solar for the installation of an 80 kWp solar panel system.

This collaboration marks a significant milestone in our ESG strategy as we strive towards a transition to cleaner energy sources. With this installation, **we anticipate generating approximately 75,000 kWh of electricity annually over the next 25 years** at our headquarters in Theale, UK.

This significant output will make a **considerable contribution to our energy requirements, which currently stand at approximately 209,990 kWh consumed on-site.**

Investing in solar energy allows us to reduce dependency on traditional energy sources and embrace renewable alternatives, while setting an example for other businesses. This investment not only supports our sustainability goals, but also contributes to the fight against climate change and promotes a greener future.



Mitigate exposure to market volatility

Safe, reliable, and quick to deploy

Carbon savings and improved sustainability

In the coming year, we aim to report on energy consumption data for UK and America Centers of Excellence (CoE).

In addition, starting next year, we will be equipped to provide data on energy generated through solar panels installed in Theale, offering a comprehensive overview of our sustainable energy initiatives. We aim to measure and report the energy intensity of our products by 2030.

Our journey to a zero-carbon future comes with a commitment to our customers by offering solutions that reduce GHG emissions in their supply chains.

It is clear that the global economy must work towards a science-based trajectory of continual decarbonisation in order to restrict global warming within the 1.5°C limit.

At Tower we understand that a significant proportion of GHG emissions exists along the organisational value chain, and that widespread collaboration with partners, suppliers, customers and other key stakeholders will be required to achieve net zero.

We recognise that any climate transformation journey must start with first understanding our climate impact and associated GHG emissions from our business activities. We have used an operational control approach for the purposes of GHG accounting.

Scope 1 and scope 2 emissions were calculated for the UK headquarters to establish a baseline emissions calculation for ongoing reporting. GHG emissions were calculated from recorded consumption of purchased electricity and gas, using the UK Government emission factors 2023 (V1.1). Tower does not own any vehicles or assets powered by fossil fuels (i.e. there were no stationary or transport related emissions).

Our journey to a zero-carbon future comes with a commitment to our customers by offering solutions that reduce GHG emissions in their supply chains.

We will develop an emissions reduction strategy in order to reduce our contribution to climate change over time. The initial short-term goal is to reduce Scope 1 and Scope 2 emissions from energy consumption at the company’s headquarters.

To this end, we have invested in solar energy generation and introduced an electric vehicle charging scheme by installing several charging points available to staff, contractors, and visitors.

In 2023 we opened our proprietary Centre of Excellence in Philadelphia, with further plans to invest in a similar facility with sustainability credentials in Singapore to support our APAC coverage. There are commitments in place to calculate GHG emissions and extend reduction measures across both sites.

TABLE 1 Energy consumption and GHG emissions for the current reporting year (OCT 22 - SEP 23)

Type	Energy Consumption (kWh)	GHG Emissions (tCO ₂ e)
Gas (Scope 1)	40,615	7.43
Other fuels (Scope 1)	0	0
Electricity (Scope 2)	209,990	43.48
Transport fuel (Scope 1 - Company Fleet)	0	0
Total	250,605	50.91

To address the decarbonisation of all operations within our value chain, as part of a more long-term reduction strategy, we are collaborating with the Cardiff Business School to identify ways in which the operational supply chain can be optimised for greater efficiency leading to reduced emissions.

The objective was to test the feasibility of a decision support system (DSS) for Tower’s global distribution network using cutting-edge modelling.

Examining Tower’s historical shipment data, researchers at Cardiff Business School constructed a mathematical model which highlights how containers might ‘flow’ around the global network, including existing or even new transportation hubs. The projections can assist Tower to minimise empty movements and over-stocking of product, both critical goals for Tower’s sustainability journey.

The research was presented at international conferences in 2023, including the 27th Annual Conference of The Chartered Institute of Logistics and Transport (UK) and the International Symposium on Logistics (ISL).

To address the decarbonisation of all operations within our value chain, we are collaborating with the Cardiff Business School.



Over the past two-and-a-half years, our three-strong team of academics has worked with Tower Cold Chain to identify data-derived strategies to reduce carbon related-emissions caused by non-value-added movements in cold-chain distribution.

This has been a groundbreaking opportunity to challenge important research to provide tangible and impactful implementations.

DR. DANNY MOGALE,
Lecturer in Logistics and Operations Management at Cardiff Business School



Managing the movement of our passive containers within our global network of hubs presents a highly intricate challenge. Cardiff Business School’s study demonstrated the feasibility of creating a decision support system.

On the success of this, Cardiff Business School and Tower have agreed to embark on a multi-year collaboration to mature this methodology to revolutionise Tower’s processes; to create smart stock-management and ultimately improve the availability of our containers for Tower’s customers, while simultaneously ensuring sustainable operations.

KEVIN DORAN,
Head of Global Supply Chain at Tower Cold Chain

Regarding our manufacturing capability, Tower is exploring options to manufacture in North America to minimise the need to re-position containers across the Americas thereby significantly reduce the movement of empty containers.

Our operational hubs are strategically positioned close to our pharmaceutical manufacturing customers in order to minimise transport journeys, whilst also being responsive to our customers' demand with the ability to respond quickly.

Tower will continue to measure GHG emissions to understand their operational impact on climate change, and identify emissions hotspots across the value chain which can lead to opportunities for effective decarbonisation.

This commitment will enable data-driven decision making across operations to ensure best practice both internally and externally. Our longer-term goal is to work towards global net-zero targets by coordinating with all customers and suppliers to collectively improve climate-related performance globally.

At our headquarters in Theale (UK), we are aiming to achieve a target of **sourcing 20% of our energy from renewable solar sources by 2024.**

Additionally, we plan to **phase out natural gas consumption at site, shifting to fully electrified operations from 2025.**

We also commit to **measure our Direct GHG emissions (Scope 1) from our sites in New Jersey and Singapore with the aim to start reporting emissions in the following reporting year.**

Tower's supply chain for manufacturing has built-in resilience to different climate-related scenarios to ensure business continuity and supply.

The process for identifying climate-related risks is established at Board level within the Audit & Risk Committee. At management level climate-related risks are managed via the Risk and Opportunity register and the information is cascaded to staff members.

Any outcomes or communicated levels of risk or opportunity are reviewed and considered by the Senior Leadership Team, with any recommendations, climate-related and other, taken to the Board for approval. Risks are scored according to the scoring matrix below. Each identified risk is subject to review and with the risk score adjusted on a quarterly basis. Risks are addressed in order of priority and opportunities mapped out with both internal and external stakeholders.

Tower rely on a resilient supplier base, for hub operations, transport, and manufacturing. Tower's supply chain for manufacturing has built-in resilience to different climate-related scenarios to ensure business continuity and supply. Robust agreements and training programs with suppliers facilitate product assembly and an agile made-to-order production schedule that ensures we only make what we need, and can scale as demand warrants.

Our containers are robust, with a minimum expected lifespan of five years. On occasion, a container may need to be decommissioned. In this case, all parts can be recycled or in the case of plastics, used as a fuel source. No components need to be disposed of in landfill.

TABLE 2 Climate-related risks and opportunities

Definitions	Impact			Likelihood	
	Financial	Operational	Score	Criteria	Score
Critical R or Critical O	Loss of >£1M or Profit of >£1M	Critical R/O with major disruption & slowdown	4	Event expected to happen	4
Important R or Important O	Loss of £0.5M-£1M or Profit of £0.5M-£1M	Critical R/O with delay by 3 months	3	Event anticipated or such event experienced before	3
Moderate R or Encouraged O	Loss of £0.1M-£0.5M or Profit of £0.1M-£0.5M	R/O creates interference however workaround is possible	2	An event that can be envisaged but has not occurred previously in the area (up to two occurrences of event)	2
Acceptable R or Weak O	Loss of <£0.1M or Profit of <£0.1M	R/O creates minor disruption & delay	1	An event that can be envisaged but is considered to be very unlikely to occur	1

Water Management

WATER WITHDRAWAL, CONSUMPTION AND DISCHARGE

Use of water in Tower-operated warehouses is very limited. Water is primarily utilised for necessary tasks such as jet-washing containers and use of water by staff.

By employing water solely for these essential purposes, Tower ensures minimal wastage and promotes responsible water consumption.

Tower's headquarter in Theale (UK) is equipped with a highly-efficient petrol interceptor. This state-of-the-art technology not only demonstrates Tower's commitment to preventing fuel leakage into groundwater but also serves as a robust safeguard for the environment.

By implementing this proactive measure, Tower demonstrates its steadfast dedication to environmental sustainability and responsible water resource management.

Tower has a record of zero spill incidents. Tower stores any potentially harmful products away from any drains, meaning the phase-change-material (PCM) plates are stored inside the warehouse and never outside, where a leak could enter the water system.

Tower has a spill procedure and conducts annual spill training for everyone who works on the warehouse floor. The spill procedure is part of the ISO14001 management system which is audited and was approved by a UKAS accredited company, LRQA.

Our commitment is to maintain our zero-incident record of any spill incidents involving potentially harmful products at our facilities.

0

Number of spill incidents involving potentially harmful products

Furthermore, in the upcoming year, we intend to commence tracking total water consumption alongside energy usage at all primary sites under operational control.

EESSGG

SOCIAL

Employee Engagement

OUR WORKFORCE

HR POLICIES AND MANAGEMENT SYSTEM

Our Human Resources policies cover a diverse range of essential topics, such as non-discrimination, compensation guidelines, privacy protocols, and human resource development.

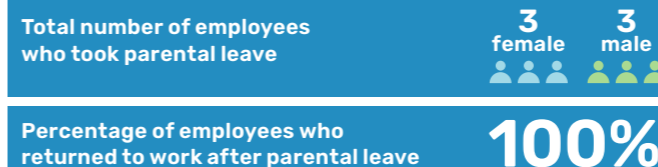
These policies are detailed in the comprehensive Employee Handbook, guaranteeing that every employee has easy access to concise and transparent information regarding their rights, obligations, and the company's commitment to cultivating a work environment that is fair and inclusive.

Tower Cold Chain have developed a robust HR system that efficiently manages various aspects of employee data, including payroll, recruitment, benefits administration (total rewards), time and attendance, employee performance management, and the tracking of competency and training records. This system adheres to recognized industry standards, ensuring accuracy, reliability, and compliance with established best practices. In this way, we streamline HR processes, enhancing overall efficiency and effectiveness in managing critical employee information, from hiring to retirement.

By the end of 2024 labour turnover data will be made available for all Centers of Excellence (CoE)

PARENTAL LEAVE

Our goal is to conduct a comprehensive review of the parental leave offerings for all Centers of Excellence (CoE) by the end of 2024.



BENEFITS PROVIDED TO FTE

Tower Cold Chain provides a range of service-related benefits to their full-time employees, ensuring their well-being and job satisfaction. However, it is important to note that these benefits may not extend to temporary positions within the company. Temporary employees typically have a different employment status and may not be eligible for the same comprehensive benefits as full-time employees.

Tower Cold Chain provide discretionary bonuses to its employees as a way to recognise exceptional performance and motivate the workforce. Unlike contractual bonuses, these bonuses are not guaranteed and are dependent on specific conditions or performance metrics. This discretionary approach gives the company flexibility in deciding when and how the bonuses are awarded, allowing for tailored incentives that align with business goals and individual achievements.

We are committed to making the benefits list for full-time employees accessible across all regions where we operate (UK, Europe, India, Singapore, America, South Africa, Germany, Ireland, Netherlands) by the end of 2024.

By clearly communicating the differences in benefits between full-time and temporary positions, Tower Cold Chain ensures transparency within its workforce.

This approach acknowledges the diverse employment arrangements within the organization while providing opportunities for full-time employees to enjoy comprehensive benefits that contribute to their overall job satisfaction and engagement.

Employee Engagement

TRAINING & DEVELOPMENT

We continuously invest in training programs to ensure safety and compliance, making a positive operational difference.

TRAINING

Tower Cold Chain is committed to training all employees as necessary to fully develop their potential and ensure that standards of competence are maintained.

We aim for at least 80% of our total employees to have completed the new learning programme by 2025.

During the reporting period we provided training to 100% of our employees, ensuring they are equipped with the necessary skills, knowledge, and values to succeed in their careers and contribute to the overall success of Tower Cold Chain.

Tower offer a comprehensive range of skill-upgrading programs which are designed to enhance employee capabilities and ensure continuous professional development.

Key training initiatives include but are not limited to:

New Starter Onboarding

We provide new employees with standard policy training, IT orientation, equal opportunities training, and various policy-related sessions to ensure a smooth integration into our company culture.

Ongoing Process Training

Our focus is on improving employees' process-related skills to enhance efficiency, productivity, and adherence to industry best practices. These sessions are designed to keep our workforce up-to-date with the latest techniques and tools.

Functional Training

We offer functional training in areas such as Excel proficiency and other relevant software tools. This empowers employees to enhance their technical skills, enabling them to perform their roles more effectively.

Tower has successfully enrolled numerous employees in a **comprehensive communication course**, notably within the operations department.

Additionally, Tower collaborated with Impellus on a government-funded initiative aimed at enhancing employee development through a specialised training institute.

As a result, **several employees obtained certificates in Leadership & Management, and one individual attained a diploma.**

Department/Job Specific Training

We tailor training programs to equip employees with the necessary skills and knowledge required for their specific roles within various departments. This allows them to thrive in their respective positions.

Leadership and Development Training

Designed to nurture leadership qualities and enhance management skills, our leadership and development training programs aim to empower employees to take on higher responsibilities and contribute to the company's growth.

DEVELOPMENT

At Tower Cold Chain, the **importance of employee performance reviews** is recognised and a **well-established system** is in place to ensure regular assessment and feedback.

These reviews serve as a **valuable tool for evaluating the progress, development, and adherence to our corporate values by employees.**

Conducted annually by immediate supervisors, these reviews provide an opportunity for open and constructive dialogue between employees and their supervisors. Through this process, employees receive feedback on their performance, discuss

their achievements, identify areas for improvement, and set goals for the future. By maintaining a strong performance review system, we demonstrate commitment to fostering employee growth, enhancing productivity, and ultimately ensuring the overall success of the organisation.

In the reporting year, all employees received comprehensive performance reviews. The organisation is committed to ensuring that career reviews are treated with utmost importance, with a focus on providing a fair and unbiased assessment for all individuals.

We aim to have **100% of employees in our Centers of Excellence** and at all role levels to have received **regular performance and career reviews** by end of 2024.



Employee Engagement

OCCUPATIONAL HEALTH & SAFETY

OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

Tower Cold Chain's OHS Management System prioritises the safety and well-being of its employees. This system serves as a comprehensive framework to ensure that all necessary precautions and protocols are in place to minimise workplace hazards and promote a healthy work environment.

In line with our commitment to safety, Tower have achieved ISO 45001 certification. This significant achievement was driven by recognition of the growing operational demands from expansion into a larger warehouse.

The scope of the ISO 45001 HSE management system extends beyond a mere certification.

It is an integral part of Tower's Integrated Management System (IMS), covering a wide range of employees, activities, and workplaces. Whether based at the Theale HQ offices or the warehouse, employees across various functions, including the technical team and supply chain, fall under the protective umbrella of this management system.

HAZARD IDENTIFICATION, RISK ASSESSMENT AND INCIDENT INVESTIGATION

At Tower, we implement ISO-aligned Standard Operating Procedures (SOP) to identify work-related hazards and assess risks. Our team conducts regular risk assessments, performed by certified individuals with ISOH qualifications. We value input from our stakeholders to enhance our procedures.

Using the hierarchy of control, we conduct risk assessments to reduce and eliminate negative occupational health and safety impacts directly linked to our operations, products and services.

Worker safety is our priority. We have robust communication channels to protect workers reporting hazards and removing themselves from risky situations. Our commitment to transparency fosters a safe environment for raising concerns without fear of reprisal.

In the unfortunate event of any work-related incidents, we have a well-established incident report procedure in place to conduct detailed investigations, identifying the root causes and implementing appropriate corrective actions.

These findings and actions are then discussed in our Health, Safety, and Environment (HSE) committee meetings, ensuring a comprehensive approach to prevention.

To further support a transparent reporting culture, we provide various channels for reporting and resolution. These channels are clearly outlined in our corporate handbook, which includes a dedicated whistleblower policy. This ensures that employees feel empowered to raise concerns or report any misconduct without fear of retaliation.

Our goal is to enhance our existing processes and ensure that new employees receive comprehensive training upon joining our team. This approach is crucial for fostering a supportive and well-prepared workforce.

PARTICIPATION OF WORKERS IN THE IMPLEMENTATION OF OHS MANAGEMENT SYSTEM

Our Health and Safety team have established structured mechanisms to facilitate employee and worker involvement and engagement in the development, implementation, and evaluation of the occupational health and safety management system.

The HSE committee holds monthly meetings to address important topics such as accidents/incidents, risk assessments, policy updates, audits, and more.

Quarterly walk-around inspections are conducted with the HSE committee to ensure hazards are identified and updated in order to implement preventive measures.

Meetings promote cross-functional collaboration with representatives from various departments. Detailed minutes are recorded for transparency and accessibility. Guest attendees from different areas of the organization enhance understanding and encourage diverse perspectives.

We prioritise the health and safety of all employees worldwide, promoting a culture of responsible management-worker collaboration.

We have demonstrated our commitment to promoting a safe and healthy work environment through the establishment of a formal joint management-worker health and safety committee. This committee serves as a platform for collaboration and dialogue between management and workers, fostering effective communication and decision making regarding health and safety responsibilities.

TRAINING ON OCCUPATIONAL HEALTH AND SAFETY

Tower Cold Chain take a proactive approach to address health, safety, and environmental (HSE) concerns through regular toolbox talks.

These focused discussions provide workers with targeted training and guidance on specific HSE topics, tailored to address the particular risks and challenges present in the workplace. By doing so, we enhance workers' understanding of potential hazards and empower them to take effective measures to mitigate risks.

Our Health & Safety team also embrace the use of online platforms to deliver training modules on various health and safety subjects.

This inclusive approach ensures that all workers, regardless of their roles or locations, have access to essential training. Topics covered in online training include vital subjects like manual handling techniques,

safe practices when working at heights, and relevant occupational health and safety protocols. By using digital platforms, we reach a wide range of employees, equipping them with the necessary knowledge and skills to prioritise their own safety and the safety of those around them.

We are committed to equipping all employees with the necessary processes tailored to their respective job roles. Furthermore, comprehensive HS&E training is offered to employees within the CoE to ensure the safe execution of their responsibilities. The maintenance of training records and ongoing accessibility of data across diverse training platforms are key priorities.

Looking ahead to 2024, Tower's objective is to implement a training platform capable of delivering mission-critical training in languages other than English, thus catering to employees in various global locations.

Our goal is to ensure that 100% of employees in all CoEs and Tower hubs receive comprehensive occupational health and safety training by the end of 2024.

PROMOTION OF WORKER HEALTH

We believe in prevention for good health and are proud to create a culture where employees feel encouraged to prioritise their health.

Our proactive approach includes a range of voluntary health promotion services and programs that address physical and mental well-being. One key program is the Health Cash plan, providing financial support for employees' health expenses. We understand the burden of medical costs and ensure access to care without financial worry. From routine check-ups to specialized treatments, the Health Cash plan encourages employees to prioritise their health.

Additionally, our Life Assurance plan offers free counselling sessions to support

mental health. Confidential counselling sessions provide professional guidance for personal challenges and maintaining work-life balance.

We are committed to assessing our healthcare and well-being services, with a comprehensive review planned for the year 2025.

Tower ensure all personal information is held securely and sensitively. Tower support employees with access to healthcare arrangements that are either funded or part funded by Tower. Healthcare and wellbeing provision will be reviewed at regular basis and given a full review in 2025.

PREVENTION AND MITIGATION OF OHS IMPACTS DIRECTLY LINKED BY BUSINESS RELATIONSHIPS

In every risk assessment, the section "implementation measures" outlines specific actions to be taken to mitigate OHS impacts. These measures are integrated into Tower's Continuous Improvement Plan (CIP), a comprehensive document that encompasses findings from various sources, including risk assessments and general meeting observations to enhance the effectiveness of the Integrated Management System.

To exemplify the practical implementation of a risk assessment, consider the case of a

noise risk assessment conducted for the warehouse. As a direct result of this assessment, Tower have taken action by providing noise-reducing earplugs to warehouse personnel.

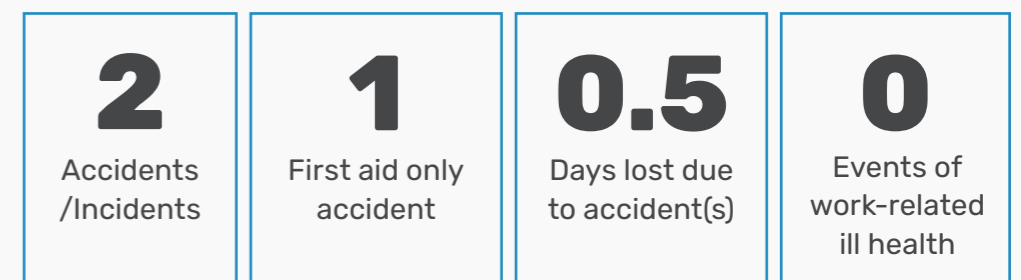
This proactive measure aims to mitigate the potential impact of noise-related hazards on employees' well-being and safety.

Tower pledge to uphold a commitment to ongoing improvement in workplace health and safety through regular reviews of Risk Assessments and sustained collaboration across departments.

WORK-RELATED INJURIES AND ILL HEALTH

Starting in 2025, we will systematically record this data for all Centers of Excellence (CoE) and Tower-managed service centers (hubs). Our goal is to maintain a clean record of injuries by offering comprehensive training.

Tower currently has 22 risk assessments for the UK CoE in place, covering all areas of the offices and warehouse, and these are reviewed annually or in case of changes.



We are aiming to have relevant risk assessments in place for the US CoE in 2024.

Diversity, Equity & Inclusion (DEI)

We value diversity and understand that a supportive and inclusive culture along with a respectful environment is essential for our people and business to succeed.

We treat all employees fairly and with dignity, and provide a working environment free from direct and indirect discrimination, harassment or victimisation.

We ensure that our employees are aware of their legal and moral duty not to discriminate against other employees, job applicants, suppliers, customers or any other business contacts.

Tower commit to providing Equal Opportunities for all and **promoting equality in all aspects of employment**, including recruitment, through the provision of training and career development opportunities in order to:

- ✓ Make full use of the talents of our employees
- ✓ Provide the same level of opportunity for everyone
- ✓ Improve our management practice
- ✓ Strengthen our reputation as an employer
- ✓ Attract and retain new employees
- ✓ Show our customers that we are a fair and reliable company
- ✓ Ensure that our employment and business practices do not infringe the law
- ✓ Demonstrate our commitment to be an equal opportunities employer
- ✓ Ensure access to training

Tower ensure their commitment to DEI is managed by:

Recognising its legal obligations under the **Equality Act 2010** and also other associated legislation and appropriate case law.

Ensuring that all **future policies and procedures regarding employment** issues are developed in strict accordance with our **Equal Opportunities policy**.

Distributing and publicising this policy statement throughout the Company.

Regarding any deliberate discriminatory action, including harassment, by any employee as a **serious disciplinary offence**.

Providing facilities for any employee who believes that he/she has been unfairly treated to raise the matter through the **grievance procedure**.

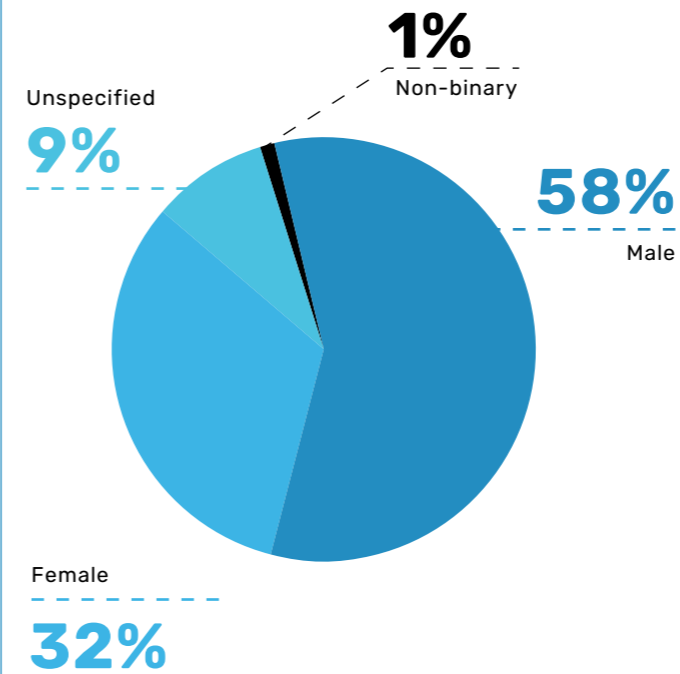
Reviewing this policy on an annual basis in conjunction with all managers to ensure that implementation is being carried out effectively.

Bringing the contents of this **policy** to the **attention of all employees**, whether full or part time.

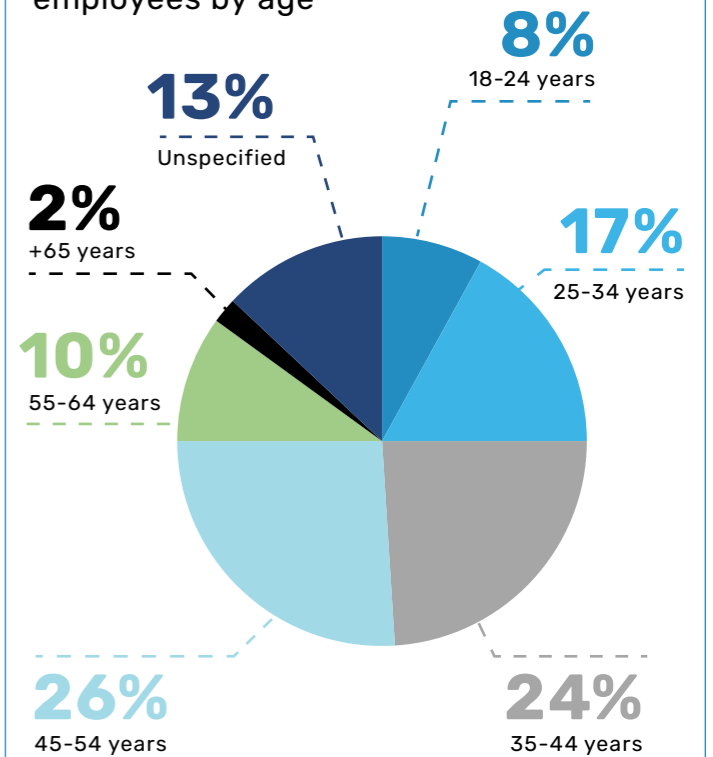
Making **training available to all staff** covering equal opportunities issues.

DIVERSITY AND EQUAL OPPORTUNITIES

Breakdown of employees by gender



Breakdown of employees by age



NON-DISCRIMINATION

We commit to review our employment policies to ensure we support minority groups in our workplace.

Tower has a **zero-tolerance approach to any discrimination or bullying** and have policies in place to ensure that employees have **communication channels to report any form of behaviour which is in breach of these policies**.

Our policies apply to all employees and are applicable to not only their usual work environment, but also to **any work-related functions held out of working hours**, such as team events or other social activities.

We commit to review our employment policies to ensure we support minority groups in our workplace. This includes exploring options such as enhanced part-time and flexible work arrangements, as well as utilising a diverse array of advertising channels to attract candidates from a wider range of backgrounds.

0

Number of discrimination incidents reported

Community Relations

ASSESSMENT OF IMPACTS IN LOCAL COMMUNITIES

As part of our ISO 14001 certification, we maintain a regularly-updated 'Aspects & Impacts' register. This register is connected to our Risk Register, which undergoes review in the Audit and Risk Committee meetings.

The committee, consisting of several members of the Board, our QA manager and the CEO evaluate business and other related risks.

The assessment of environmental impacts occasioned by our operations to our HQ in Theale reveal several key activities that have been evaluated and which present a very low impact to the environment and local communities.

These activities include among others:

WAREHOUSE OPERATIONS

The operations within our warehouse facility have been carefully examined to identify any potential environmental impacts.

This assessment takes into account factors such as energy consumption, waste generation, and emissions.

GENERAL SITE OPERATIONS

The general day-to-day activities that take place on our site have also been considered.

This includes any activities that may contribute to pollution, noise, or other negative impacts on the local environment.

DELIVERY OPERATIONS

As a company involved in product delivery, we understand the importance of assessing the environmental impact of our delivery operations.

This assessment encompasses aspects such as fuel consumption, vehicle emissions, and packaging waste.

FIRE

The potential risk of fire can have severe consequences for both our operations and the surrounding environment.

By evaluating the risk factors and implementing appropriate measures, we aim to minimize any negative environmental impacts caused by fire incidents.

FLOOD (Extreme Weather, Drainage Leak, Environmental Events)

The assessment takes into account the risk of flooding due to extreme weather conditions, drainage leaks, or other environmental events.

Such incidents can lead to water pollution, damage to infrastructure, and harm to the surrounding ecosystems.

ADMINISTRATIVE ACTIVITIES

The environmental impacts resulting from administrative activities, such as energy usage in offices, paper waste, and water consumption, have also been thoroughly evaluated. Efforts are made to implement sustainable practices and reduce these impacts.

MAINTENANCE AND WASTE MANAGEMENT

The maintenance activities carried out on our premises, as well as our waste management practices, are included in the assessment.

This involves proper disposal of hazardous materials, recycling initiatives, and minimising waste generation wherever possible.

We are committed to conducting a comprehensive social impact assessment of our operations on local communities by the year 2025

In 2023, Tower Cold Chain organised, participated and supported multiple charity initiatives to support various causes such as:

"Time to Talk Day" with Mind to raise mental health awareness.

"Pretty Muddy" and a Women's World Cup sweepstake for Cancer Research UK combined with employee participation in an obstacle course.

"Wear It Pink" supporting Breast Cancer Now where employees and community members wore pink and organised activities.

"The Macmillan Coffee Morning" to contribute to Macmillan Cancer Support.

"Christmas Jumper Day" for Save the Children, raising funds to help children in need.

"Pride Week" celebrates equality and acceptance of all by encouraging employees to wear bright attire and bake colourful cakes.



Partnerships To Accelerate Goals (2023)

	<p>The trade association for the world's airlines comprising of 83% of total air traffic</p>		<p>A portal designed for collaboration across LifeScience and Medtech shippers and other industry stakeholders</p>
	<p>The World's Most Trusted Business Sustainability Ratings</p>		<p>ISO is an independent, non-governmental international organization with a membership of 167 national standards bodies</p>
	<p>Working to improve the temperature-sensitive supply chain to reduce food loss and waste in the perishables sector as well as benefiting the pharma community.</p>		<p>Airline Catering Association is a non-profit international association</p>

Forward-Looking Statement

This ESG report includes **forward-looking statements reflecting our expectations and projections** for how the company will change and improve in the years ahead.

It should be noted that **these forward-looking statements entail risks and uncertainties** that could lead to material differences between our projections and actual results.

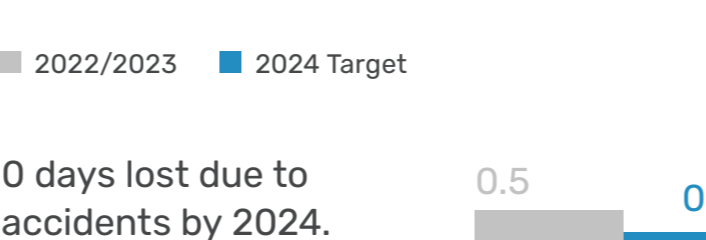


ESG Target Dashboard

Circularity



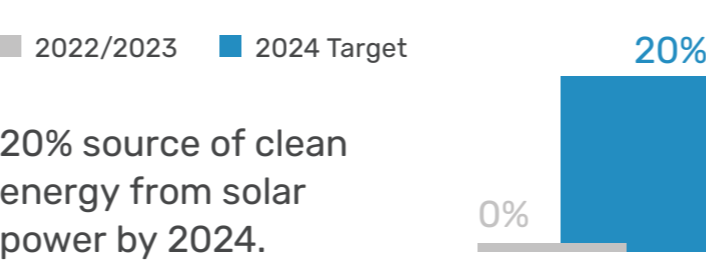
Health and Safety



Supply Chain Engagement



Energy



Number	Disclosure	Page number/Notes
GRI 2: General Disclosures		
2-1	Organisational details	Page 5
2-2	Entities included in the organisation's sustainability reporting	Pages 10 , 12
2-3	Reporting period, frequency and contact point	Pages 12 , 14
2-4	Restatement of information	Not applicable
2-5	External assurance	Page 12
2-6	Activities, value chain and other business relationships	Pages 8 , 9
2-12	Role of the highest governance body in overseeing the management of impacts	Pages 27 , 30
2-23	Policy commitments	Note 1
2-27	Compliance with laws and regulations	Page 27
GRI 3: Material Topics		
3-1	Process to determine material topics	Pages 16-19
3-2	List of material topics	Page 19
GRI 204: Procurement Practices		
204-1	Proportion of spending on local suppliers	Page 30
GRI 205: Anti-Corruption		
205-1	Operations assessed for risks related to corruption	Page 27
205-2	Communication and training about anti-corruption policies and procedures	Page 27

Number	Disclosure	Page number/Notes
GRI 301: Materials		
301-1	Materials used by weight or volume	Page 34
301-2	Recycled input materials used	Page 34
GRI 302: Energy		
302-1	Energy consumption within the organisation	Page 43
GRI 303: Water and Effluents		
303-1	Interactions with water as a shared resource	Page 49
GRI 305: Emissions		
305-1	Direct (Scope 1) GHG Emissions	Page 44
302-5	Reduction of GHG emissions	Page 44
GRI 306: Effluents and Waste		
306-2	Management of significant waste-related impacts	Page 38
GRI 401: Employment		
401-1	New employee hires and employee turnover	Page 53
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Page 53
401-3	Parental leave	Page 53
GRI 403: Occupational Health and Safety		
403-2	Hazard identification, risk assessment and incident investigation	Page 59
403-4	Workers participation, consultation and communication on occupational health and safety	Page 60
403-5	Worker training on occupational health and safety	Page 60
403-6	Promotion of worker health	Page 61




















Number	Disclosure	Page number/Notes
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 61
403-9	Work-related injuries	Page 61
403-10	Work-related ill health	Page 61
GRI 404: Training and Education		
404-2	Programs for upgrading employee skills and transition assistance programs	Page 55
404-3	Percentage of employees receiving regular performance and career development services	Page 56
GRI 405: Diversity and Equal Opportunity 2016		
405-1	Diversity of governance bodies and employees	Pages 64 , 65
GRI 413: Local Communities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	Page 67
413-2	Operations with significant actual and potential negative impacts on local communities	Page 67
GRI 414: Supplier Social Assessment		
414-1	New suppliers that were screened using social criteria	Page 31
414-2	Negative social impacts in the supply chain and actions taken	Page 31
GRI 416: Customer Health and Safety 2016		
416-1	Assessment of the health and safety impacts of product and service categories	Page 40
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Page 40

TCFD* Index

*Task Force on Climate-Related Financial Disclosures (TCFD)

Type	Disclosure	Page number/Notes
Governance		
G-a	Describe the Board's oversight of climate-related risks and opportunities	Page 26
G-b	Describe management's role in assessing and managing climate-related risks and opportunities	Page 26
Strategy		
S-a	Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term	Pages 44, 45
S-b	Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning	Page 44, 45
S-c	Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	Page 46
Risk Management		
R-a	Describe the organisation's process for identifying and assessing climate-related risks	Page 47
R-b	Describe the organisation's processes for managing climate-related risks	Page 47
R-c	Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	Page 47
Metrics & Targets		
MT-a	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process	Page 44
MT-b	Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks	Page 44

Appendix

				Direct impact	Indirect impact
		Material topics	Subtopics		
Sustainable development scopes	Environmental	Product innovation, development & circularity	Circularity	   	 
			Waste management		
			Product quality & safety		
		Climate change & GHG emissions	Energy efficiency		
			Greenhouse gas emissions		
		Water management	Water withdrawal, consumption & discharge		
	Social	Employee engagement	Human resources	  	  
			Training & development		
			Occupational health & safety		
		Diversity, Equity & Inclusion (DEI)	Diversity & equal opportunities		
			Non-discrimination		
		Community relations	Assessment of impacts in local communities		
			Corporate Social Responsibility (CSR)		
		Business ethics	Compliance		
			Non-financial capital allocation		
Anti-corruption & bribery					
Anti-child labour, forced labour & slavery					
Data privacy & security	Customer privacy & data security				
Economic	Supply chain engagement	Procurement practices		    	
		Supplier environmental and social assessment			