



BECOME GREATER

# Environmental, Social and Governance (ESG) Policy

Document Version 4.0

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## Identification

File Name	Owner
Environmental, Social and Governance (ESG) Policy	Head of Governance & Sustainability

## Preparation & version tracking

Version	Title	Date	Action/comment
0.1	Head of Compliance	01/08/2022	Document creation
0.2	Head of Compliance	28/10/2022	Updates following review between CFO and H of C
1.0	Head of Compliance	25/11/2022	Issue 1
2.0	Head of Sustainability & Compliance	18/01/2024	Annual review: → New Section 2 added; → Structure of Section 3 reworked; → New Section 4 added.
3.0	Head of Sustainability & Compliance	11/12/2024	Annual review: → Update to Section 3.1 to include reference to ISO 14001 certification; → Sections 3.2 and 3.3.1 updated to include protection of employees from all forms of harassment; → Section 4 deleted.
4.0	Head of Governance & Sustainability	05/01/2026	Annual review: → Ownership role updated in Section 2; → Section 3.1 reworked; → Sections 3.3.1 and 3.3.2 updated for clarity.

## Reviewers/Authorisers

Title	Reviewer/Authoriser	Date	Date of Next Review
Global Operations Director	Authoriser	05/01/2026	January 2027



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# 1 Introduction

Kocho exists to help companies realise their potential by combining the power of Microsoft cloud technology with world-class identity, cyber security and our team of brilliant people and trusted partners – we take our clients on a journey of secure transformation.

We care about who we do business with and operate ethically and honestly with sensible governance in place to enforce this. We focus on helping our clients succeed and grow through transformational change, and work with trusted partners such as Microsoft to help them achieve this. We also care about the environment and seek to minimise the impact our Company has on it. And finally, we also seek to have a positive impact on society, both in the local communities within which our employees live and work, and more broadly.

We run Kocho according to our ESG principles, and this document sets out those principles and explains how we ensure we adhere to them. This includes trying to ensure that we only do business with organisations, both customers and partners, that we feel fit in with these guiding principles.

Growth companies, of the type we help, develop innovative products and services that enhance the lives of their employees, customers and communities. Our clients and partners generate employment and help to grow the economy, creating returns for management, shareholders and investors, as well as contributing to the UK. Secure transformation and cloud adoption provides a strong and efficient platform on which our clients can operate.

However, we are mindful of negative factors that could undermine that social good. We include consideration of these matters in our diligence and ongoing client and partner targeting and onboarding processes.

We are also aware of the potential opportunities available to companies by integrating ESG considerations into decision making and we factor this into our on-going work with the clients and partners we engage with.

# 2 Governance and Responsibilities

The Head of Governance & Sustainability is the owner of this Policy and undertakes a review of the document on at least an annual basis with the Global Operations Director.

This Policy is available to all employees via the Kocho intranet and can be shared with clients and third parties on request.

Risks related to the ESG Strategy are managed via Kocho's risk management framework.

This ESG Policy has been approved by the Board of Directors and made available to members of the Kocho Investor Board.



## 3 Guiding Principles

### 3.1 Environmental

We are certified to the [ISO 14001](#) standard and have an Environmental Management System (EMS) in operation. This complements our existing certifications in ISO 27001 (Information Security) and ISO 9001 (Quality). We also measure our emissions and power usage as part of our annual reporting.

Our principles in this area therefore concern energy and carbon management, pollution, waste and recycling:

- Implement and uphold sustainable practices that minimise our environmental footprint, including the efficient use of resources and effective waste management, as detailed in our *Environmental Policy*.
- Work with clients and partners who share our environmental values:
  - For example, the environmental policy of our selected third-party recycling partner states their intention not to dispose of any IT equipment in landfill and to schedule their collections to minimise toxic emissions.
  - We will avoid dealing with companies who engage in practices harmful to the environment.
- Examine potential client and partner supply chains through the following areas:
  - How does their business consider its energy use?
  - How does their business dispose of waste?
  - What does their business recycle?
- Continuously improve on our carbon reporting to enable the production of meaningful carbon reports covering consumption and emissions, the identification of trends and our plans for further reductions and improvements.
- Take steps to minimise the impact on the environment of our consumption of laptops and mobile phones by recycling, re-using and donating to organisations to tackle digital exclusion and e-waste.

Kocho is also a signatory to the Microsoft [Partner Pledge](#), committing us to work towards a more sustainable future by:

- Growing talent in the industry;
- Enhancing diversity & inclusion;
- Shaping a desirable world.



## 3.2 Social

Our principles in this area concern the protection of the worker and human rights of our employees and the impact of our actions on the community:

- Ensure Kocho abides by Health & Safety standards and complies with appropriate regulations.
- Allow an employee to request not to work for a client for ethical or moral reasons and, where possible, support such requests.
- Foster workplace practices that support diversity, equality and inclusion at all levels, pursuing an environment where everyone is treated fairly. These values are detailed in our *Equality, Diversity and Inclusion Policy*.
- Maintain commitment to diversity of thought and action amongst the staff and senior decision-makers of potential investee companies.
- Support employee welfare through effective health and wellbeing initiatives.
- Protect our employees from all forms of harassment, including sexual harassment, in the workplace.
- Ensure that all Kocho employees are paid at least the statutory minimum wage.
- Support and contribute to wider society through, for example, support of charitable causes.
- Consider the impact of Kocho's activities, services and/or products and supply chains on local and wider communities.

## 3.3 Governance

### 3.3.1 Compliance and Ethics

Our principles in this area concern compliance and business ethics:

- Be honest and transparent, and act with integrity in all our dealings with investors, clients, employees, partners and suppliers.
- Abide by applicable laws and regulations and uphold international standards of good practice.
- Undertake appropriate financial and legal due diligence exercises for each client and partner, covering accounting methods, shareholder interests, data security/GDPR, Health & Safety, modern slavery, protection of employees from harassment, anti-bribery, money laundering, fraud and tax evasion.
- Endeavour to review executive and non-executive teams and shareholders at the point of engagement with a new client, assessing whether current or previous board members, management or the lead investors exhibited any political affiliations, ongoing or historical non-ethical behaviour, or involvement in sectors against this Policy.
- Examine board practices and work with management to identify potential improvements.



- Ensure that all employees adhere to the requirements of our governance policies, including, but not limited to, our *Financial Compliance Policy; Information Security Policy; Equality, Diversity and Inclusion Policy; Modern Slavery Policy* and *Prevention of Sexual Harassment Policy*.

### 3.3.2 Marketplace

Our principles in this area concern our clients and our suppliers:

- Assess whether Kocho is dependent on clients or suppliers who exhibit behaviours or values counter to those of tolerance and freedom.
- Follow trading legislation and ethical business regulations including government guidance and legal sanctions. We do not work with individuals, clients or suppliers who own a controlling interest in a company subject to economic sanctions. Nor will we do business with companies linked to oppressive, hateful or predatory regimes.
- Consider carefully (with a bias towards not proceeding with) any client or partner who raises cause for concern through involvement in sectors or activities which are considered undesirable or unethical.
- Consider the extent to which there is a known risk within the supply chain of exploitation or modern slavery. Kocho has a zero-tolerance approach to all forms of slavery as detailed in our *Modern Slavery Policy*. As far as we are aware, and via our existing supplier due diligence process, Kocho does not purchase any goods or services from suppliers who are involved in any forms of slavery as set out in the Act.
- Ensure the firm abides by security, quality, safety and environmental standards and complies with the appropriate regulations.

## About Kocho

At Kocho, we believe greatness lies in everyone.

That's why we exist, to help ambitious companies realise their potential.

By combining the power of Microsoft cloud technology with world-class identity, cyber security and our team of talented people, we take our clients on a journey of secure cloud transformation.

And we're with you every step of the way. Because the path to greatness isn't walked alone. We help you adopt and embrace the right technology solutions at the right time.

The result? Sustainable and secure growth that amplifies your business success.

Kocho. Become Greater.



Think  
greater.



Better  
together.



Do what's  
right.



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