



Document Title:	Environmental Policy
Document Type:	Policy
Document No:	FIN.SU.PL.229
Version number:	3.1
Issue Date:	24 September 2025
Review Date:	01 October 2026

# Contents

<b>1. BACKGROUND</b>	<b>3</b>
<b>2. POLICY</b>	<b>3</b>
2.1 Energy & Emissions	4
2.2 Use of Refrigerants	4
2.3 Water	5
2.4 Waste	5
2.5 Agrochemicals	6
2.6 Integrated pest management	6
2.7 Conservation of natural ecosystems and biodiversity	6
2.8 Sustainable building design	7
2.9 Ocean stewardship	7
2.10 Air Pollution	8
<b>3. ENVIRONMENT-RELATED HUMAN RIGHTS ISSUES</b>	<b>8</b>
<b>4. VIOLATION OF POLICY</b>	<b>8</b>
4.1 How to report	8
<b>5. REVISION HISTORY</b>	<b>9</b>



<b>Document Title:</b>	Environmental Policy
<b>Document Type:</b>	Policy
<b>Document No:</b>	FIN.SU.PL.229
<b>Version number:</b>	3.1
<b>Issue Date:</b>	24 September 2025
<b>Review Date:</b>	01 October 2026



<b>Document Title:</b>	Environmental Policy
<b>Document Type:</b>	Policy
<b>Document No:</b>	FIN.SU.PL.229
<b>Version number:</b>	3.1
<b>Issue Date:</b>	24 September 2025
<b>Review Date:</b>	01 October 2026

## 1. BACKGROUND

Finlays mission is to connect humanity through natural beverages where every sip brings joy. Combining tradition and innovation to create a healthier, happier, and better world by bringing the best from bush to beverage. As a leading B2B manufacturer and supplier of tea, coffee and extracts solutions, we operate in many parts of the world, across a diverse spread of geographies, cultures and languages, in farming, manufacturing, blending, packing, innovation and sales.

Finlays strives to be good stewards of the natural resources and biodiversity under our influence. We aim to identify and manage any potential adverse impacts of our operations and are committed to making a positive contribution to environmental recovery and resilience. We are committed to understanding and mitigating the effects on people from the transition to net zero and other environmental and sustainability activities.

The principles and standards set out in this policy should be implemented by James Finlay Limited (JFL), and all affiliated companies majority owned by JFL to ensure we protect the environment in our operations, supply chain and local communities. They must also be communicated to and understood by Finlays suppliers through our [Sustainable Sourcing Policy](#).

## 2. POLICY

This policy outlines our commitment to preventing, reducing and mitigating our impact on the environment. This policy serves in addition to our No Deforestation Policy and Sustainable Sourcing Policy.

- Finlays adopts a precautionary approach to the environment throughout our operations and supply chain and undertakes environmental risk assessments prior to any major projects.
- Finlays complies and keeps up to date with national and international environmental legislation and regulatory requirements in countries of operations as an absolute minimum. We seek to align with international best practice guidance such as the OECD Guidelines for Multinational Enterprises.
- Finlays implements systems and procedures to manage our environmental activities, measure performance, set targets and undertake activities for continuous improvement.
- Finlays reduces its carbon footprint by adopting industry best practices to improve energy efficiency and by increasing the use of renewable energy and to build climate change resilience into our operations.
- Finlays contributes to the creation of a circular economy and where possible waste materials should be retained and re-used as a future resource.
- Finlays uses water responsibly and sustainably and protects watersheds.
- Finlays adopts an appropriate sustainable design approach for new and existing buildings developed, owned or used by the company, unless this is not technically feasible or the building is under a short-term lease (i.e., less than 2 years).

---

**Author:** Amelie Rey-Giraud

**Approver:** Joe Yalley-Ogunro



<b>Document Title:</b>	Environmental Policy
<b>Document Type:</b>	Policy
<b>Document No:</b>	FIN.SU.PL.229
<b>Version number:</b>	3.1
<b>Issue Date:</b>	24 September 2025
<b>Review Date:</b>	01 October 2026

## 2.1 Energy & Emissions

At Finlays we are committed to reduce our impact on the climate in line with science. The Science Based Targets initiative (SBTi) defines and promotes best practices in emissions reductions and target setting in line with climate science. Energy efficiency is also an important part of Finlays' wider efforts to decouple carbon emissions from business growth to mitigate climate change. Finlays also recognizes the impact of emissions in the form of air pollution on public health and ecological systems. Our approach should also aim to build resilience to climate change and to adapt to and mitigate its impacts.

- Industry best practices are adopted to reduce energy consumption and improve energy efficiency in our operations.
- Monitor energy performance data, set, and regularly review energy reduction targets and communicate performance against targets both internally and externally.
- Conduct regular energy assessments of operations that consume significant amounts of energy and establish energy management systems, where practicable, in line with international standards (ISO 50001).
- Use of renewable energy is increased through on-site energy generation and/or purchase of renewable energy.
- Steps should be taken, where feasible, to reduce the impact of business travel undertaken by employees. Carbon offsetting is one mechanism to achieve this.
- Leverage technology to drive continuous improvement in energy performance
- Engage employees, customers, and other key stakeholders to promote energy saving behaviour and encourage them to share ideas for improving energy efficiency in the group's businesses and operations.
- Integrate energy efficiency considerations into its procurement decisions and encourage energy-intensive suppliers to adopt energy efficient practices.
- Invest in clean technologies, logistics' optimisation, and renewable energy sources to reduce emissions and air pollution.
- Comply with all applicable air quality regulations and continuous monitoring of operations to ensure adherence.
- Collaborate with suppliers and partners to promote best practices in emissions reduction and support initiatives that improve air quality in the communities where we operate;

## 2.2 Use of Refrigerants

Refrigerant is a chemical used in any cooling system, from air conditioning systems to industrial warehouses. Most gases used in refrigerants are fluorinated gas, or F-gas, which are hundreds to thousands of times more potent a greenhouse gas than carbon dioxide. F-gas are also causing ozone depletion.

Managing the use and disposal of refrigerants are key to addressing climate change and reducing impacts on the environment. That is why we are also committed to:

- Limit usage and reduce emissions of refrigerants through leakage monitoring, maintenance procedures, decommissioning, and enforcement of applicable standards and regulations.
- Select refrigerants and machines based on a holistic analysis including regulations, energy efficiency and performance attributes, environmental impacts, employee and public safety, and economic considerations.

**Author:** Amelie Rey-Giraud

**Approver:** Joe Yalley-Ogunro



<b>Document Title:</b>	Environmental Policy
<b>Document Type:</b>	Policy
<b>Document No:</b>	FIN.SU.PL.229
<b>Version number:</b>	3.1
<b>Issue Date:</b>	24 September 2025
<b>Review Date:</b>	01 October 2026

### 2.3 Water

Finlays is a responsible steward of water resources by using it efficiently and facilitating the sustainable management of water catchments where our operations are located.

- All applicable laws for the withdrawal of surface or groundwater for agricultural, domestic, or processing purposes are complied with. Licenses or permits for water withdrawal are obtained, if required.
- Water is used carefully - water consumption is reduced, and water waste is minimised in our operations and production processes.
- Salt or freshwater ecosystems at our sites or from which we extract water are protected from over extraction or contamination because of our activities. Riparian buffers alongside aquatic ecosystems are established and maintained on our farms.
- Tests for processing wastewater are conducted at all discharge points and results are documented. Wastewater from processing operations discharged into aquatic ecosystems meets legal wastewater quality parameters.
- Sewage is not discharged into aquatic ecosystems unless it has been treated.
- Wastewater from processing operations is not applied to land unless it has undergone treatment to remove particulates and toxins and meets wastewater parameters for irrigation.
- Integrated watershed management approaches are pursued, where appropriate.
- Access to safe and drinkable water, sanitation and hygiene is provided for all employees at worksites under Finlays' control and we help provide community access to safe and potable water.
- Water risk assessments are conducted to identify key areas of risk.
- Water data are available in a transparent manner for setting, monitoring and regularly reviewing water withdrawal intensity objectives and targets.
- Business units should be working towards replenishing water stressed areas with the equivalent amount of water used in our final products which have been made in water stressed areas. This could be through projects such as reforestation, wetland recovery, and improved farming techniques.

### 2.4 Waste

Finlays is committed to managing and reducing waste effectively across its operations and views waste as a potential resource.

- Waste management plans should reflect the waste hierarchy. In order of importance aim to reduce, replace, reuse and repair, recycle, recover. Divert as much waste from landfill as possible, disposal should be the last resort.
- Employees, suppliers, and customers are encouraged to reduce waste generation in their daily operations wherever practicable. Employees should be made aware of which waste streams need to be separated.
- Systems are in place to ensure the safe handling, movement, and storage of waste.
- Hazardous waste is disposed of safely and legally in accordance with all local legislation.
- Food waste generated at company events and operations is minimised and managed as a separate waste stream wherever possible.
- Business units should:
  - meet or exceed all waste-related regulations and integrate industry best practices into operations and services;

---

**Author:** Amelie Rey-Giraud

**Approver:** Joe Yalley-Ogunro



<b>Document Title:</b>	Environmental Policy
<b>Document Type:</b>	Policy
<b>Document No:</b>	FIN.SU.PL.229
<b>Version number:</b>	3.1
<b>Issue Date:</b>	24 September 2025
<b>Review Date:</b>	01 October 2026

- o understand the waste composition associated with their activities and identify the impact of disposing this waste;
- o ensure waste data availability and transparency;
- o identify opportunities to create a circular economy in line with the Ellen Macarthur Foundation principles;

## 2.5 Agrochemicals

Finlays promotes healthy soils and crops and aims to reduce the use of synthetic agrochemicals.

- There should be an agrochemical use management plan which seeks to reduce the use of agrochemicals and dependence on the use of synthetic fertilisers and pesticides.
- No agrochemicals are used that are: prohibited by applicable law, not legally registered in the country of use, sold by an unauthorised vendor or used at levels that exceed maximum residue level at destination countries.
- People handling pesticides are suitably trained in their preparation and application.
- Personal Protective Equipment (PPE) that, as a minimum, meets relevant Material Safety Data Sheet (MSDS) requirements is worn, which is provided free of charge and maintained in good condition.
- Facilities are provided for people to bathe, change and wash clothes after application.
- Pesticides are prepared and applied according to the label or MSDS with regards to appropriate transportation, dosage, equipment and techniques, weather, restricted entry intervals.
- Mechanisms are in place to avoid contamination of pesticides from treated areas to other areas including all aquatic and terrestrial natural ecosystems and infrastructure.
- Pesticide applications are tracked and recorded.
- Containers and application equipment are stored appropriately and safely, and empty containers are disposed of through a formal collection system or returned to the supplier.

## 2.6 Integrated pest management

- For pest prevention and control, biological, physical, and other non-chemical control methods should be used as much as possible in line with any legal requirements.
- If agrochemicals are required, ensure:
  - Lowest possible toxicity and highest selectiveness.
  - They are only applied to impacted plants and areas.
  - Active ingredients are rotated to avoid and reduce resistance.

## 2.7 Conservation of natural ecosystems and biodiversity

Biodiversity and natural ecosystems are vital to maintaining a resilient environment which is crucial to the sustainable development of the business.

- Natural forests and other natural ecosystems are not converted into agricultural production or other land uses. See Finlays No Deforestation policy for further details.
- Production or processing does not occur in protected areas and buffer zones, except where it complies with applicable law.

---

**Author:** Amelie Rey-Giraud

**Approver:** Joe Yalley-Ogunro



<b>Document Title:</b>	Environmental Policy
<b>Document Type:</b>	Policy
<b>Document No:</b>	FIN.SU.PL.229
<b>Version number:</b>	3.1
<b>Issue Date:</b>	24 September 2025
<b>Review Date:</b>	01 October 2026

- Restoration of natural ecosystems near operations is promoted and biodiversity assessments are undertaken where relevant.
- Threatened animals and plants are not hunted, killed, fished, collected, or trafficked.
- Wildlife is not held in captivity or used for processing or harvesting of any crop.
- Farm animals are treated following the five freedoms of animal welfare: freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury or disease, freedom from fear and distress, and freedom to express normal behaviour.
- Invasive species are not intentionally introduced or released into the environment.
- Erosion by water and wind is reduced through practices such as re-vegetation of steep areas and terracing.
- Fire is not used for preparing or cleaning fields, except when specifically justified in an Integrated Pest Management plan.
- Awareness of biodiversity and conservation issues is promoted among employees and suppliers.

## 2.8 Sustainable building design

- All newly constructed buildings should obtain a minimum of the second highest relevant grade or above, under an internationally or locally recognised building environmental assessment standard equivalent to the Building Research Establishment Environmental Assessment Method (BREEAM) Leadership in Energy and Environmental Design (LEED).
- All existing buildings should obtain a minimum of the second highest relevant grade under a recognized standard equivalent to BREEAM or LEED whenever there are major renovations or refurbishments.
- Major retrofitting on commercial and office premises to be occupied by Finlays should also be certified under a recognised standard equivalent to BREEAM Refurbishment and Fit-Out or LEED Commercial Interiors, where practicable.
- Preference should be given to choosing rental premises whose base shell and core have been assessed under a recognised standard equivalent to BREEAM or LEED where available.
- Reassessment should be carried out regularly in accordance with the requirements of the adopted standard.

## 2.9 Ocean stewardship

Finlays recognizes the critical role oceans play in regulating climate, supporting biodiversity, and sustaining livelihoods. As a global supplier of tea, coffee, and botanical ingredients, we are committed to protecting marine ecosystems by:

- Minimising marine pollution from packaging, agricultural runoff, and waste through responsible sourcing and operational practices.
- Promoting sustainable shipping and logistics to reduce ocean-related emissions and risks of marine degradation.
- Avoiding sourcing practices that contribute to ocean acidification, overfishing, or destruction of coastal habitats.
- Collaborating with suppliers, NGOs and partners to support ocean-friendly practices and innovations.

**Author:** Amelie Rey-Giraud

**Approver:** Joe Yalley-Ogunro



<b>Document Title:</b>	Environmental Policy
<b>Document Type:</b>	Policy
<b>Document No:</b>	FIN.SU.PL.229
<b>Version number:</b>	3.1
<b>Issue Date:</b>	24 September 2025
<b>Review Date:</b>	01 October 2026

- Raising awareness among employees and stakeholders about the importance of ocean health and its connection to our business.

### 2.10 Air Pollution

We recognise the impact of air emissions on climate change, public health, and ecological systems. Therefore, we strive to reduce emissions from manufacturing, transportation, and energy use by investing in cleaner technologies, optimizing logistics, and transitioning to renewable energy sources.

- We will comply with all applicable air quality regulations and continuously monitor our operations to ensure adherence.
- Through collaboration with suppliers and partners, we promote best practices in emission reduction and support initiatives that improve air quality in the communities where we operate.

## 3. ENVIRONMENT-RELATED HUMAN RIGHTS ISSUES

We recognise that a safe, clean and sustainable environment is integral to the full enjoyment of human rights; protecting the environment is therefore fundamental to respecting human rights.

The transition to a low carbon economy and our efforts to be a more sustainable business can have unintended negative consequences for workers, farmers and local communities.

We are committed to supporting a Just Transition by seeking to identify and mitigate as far as possible adverse impacts to people arising from our Net Zero plans or other environmental and / or sustainability initiatives.

## 4. VIOLATION OF POLICY

If any employee, director, or affiliates fails to comply with this Policy it will be dealt with under the relevant disciplinary process.

### 4.1 How to report

All employees, directors, shareholders, and affiliates are responsible for preventing, detecting, and reporting instances of actual or suspicions of non-compliance with this Policy. If you suspect that there was a violation of this Policy you must report it to the [Compliance Team via the helpline \(SeeHearSpeakUp\)](#), or to the Sustainability team at [sustainability@finlays.net](mailto:sustainability@finlays.net), or to your line manager or HR Department.

Any report of actual or suspicious conduct will be treated as confidential. No employees acting in good faith will suffer any adverse consequences for reporting or refusing to engage in prohibited conduct. Finlays will not



**Document Title:** Environmental Policy  
**Document Type:** Policy  
**Document No:** FIN.SU.PL.229  
**Version number:** 3.1  
**Issue Date:** 24 September 2025  
**Review Date:** 01 October 2026

tolerate any retribution or retaliation against anyone who in good faith reports a concern or cooperates with any investigation, even when allegations are found to be unsubstantiated.

## 5. REVISION HISTORY

Editor	Version	Update date
Amelie Rey-Giraud and Juliana Guerra	3.0 Addition to Use of Refrigerants sections, close gaps against JS&S Sustainability Policies and review of the entire policy.	01 September 2024
Javier Letamendi Amelie Rey-Giraud	3.1 Oceans, Air pollution coverage	24 September 2025

**Author:** Amelie Rey-Giraud

**Approver:** Joe Yalley-Ogunro