



# Corporate Responsibility Report

## FY2025



# Report Highlights

**Part 1:** Message from our CEO

**Part 2:** Environmental

**Part 3:** Social


**Part 4:** Governance

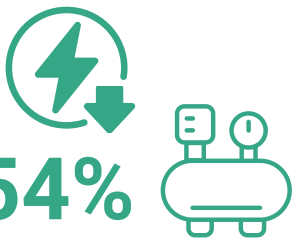
# FY2024-2025 ESG highlights

## PLANET


**17%** 

emissions reduction  
since 2021/22  
(FY24 vs FY22)

up to c. **40%**   
self-sufficiency from solar energy  
generated on-site for head office  
operational buildings  
(FY24 & FY25)

**54%**   
energy saving  
on major equipment  
through changing  
settings (FY24)

**0.25**   
tonnes of plastic  
recycled separately  
(FY24 )

**57**   
Green Travel Scheme  
participants  
(42% up!)  
(FY25)

**2**   
employees on new  
electric car scheme  
(FY25)

## PEOPLE

**17**   
Long service  
awards  
(FY25)

**4**   
work experience  
placements  
(FY25)

**5**   
internships  
(FY25)

**4**   
company wide  
employee events  
and appreciation  
days (FY25)

**47**   
Promotions and  
internal job moves  
(FY25)

**81%**   
GPTW  
survey  
responses  
(FY25)


  
Launch of **ETL Cares**  
community engagement  
initiative and 2025 Focus  
Charity (FY25)

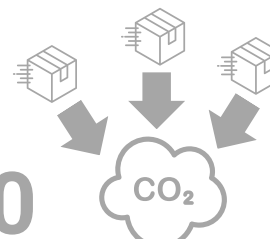
**2001**   
Learning Lounge  
training modules  
completed (FY25)

  
Employee Health  
Cash Plan  
funded by ETL  
launched (FY25)


## POLICY

**195**   
Product suppliers sent  
Supplier Code of  
Conduct and  
Environmental Surveys  
(FY24)

**1418**   
product suppliers and  
general suppliers risk  
assessed on new  
Supplier Risk Register  
(FY25)

top **20**   
supplier emissions figures  
published in annual  
Carbon Report  
(FY24 report)

  
New Circular Economy Policy  
- how we minimise energy and resources  
through the entire product life cycle; from  
design, procurement, production, product  
in use, to end of life  
(FY25)

**2**   
New Compliance Policies/  
Statements: Corporate  
Criminal Liability Code of  
Ethics, Slavery and  
Human Trafficking  
Statement (FY25)

**12**   
Compliance training courses  
launched in "Learning Lounge"  
including; EDI, Modern Slavery,  
Anti-Competitive Practices,  
Preventing Bribery in Business,  
Code of Ethics (FY25)

**20**   
Business Continuity  
Manuals with  
launch of new  
Business Continuity  
Plan (FY25)



*It is our ambition to stand out as one of the most trusted and responsible RF equipment manufacturers in the satellite industry.*

*This drives our commitment to having a positive impact on employees and communities, whilst upholding the highest standards of governance and protecting the environment.*

*Kevin Dunne (CEO)*

# Message from our CEO

In our second Corporate Responsibility Report we share progress up to the end of financial year 2025, building on ETL's strong foundations as a company that has grown year-on-year since 2003.

In FY25 ETL acquired SpacePath Communications in the UK and IRT Technologies in Canada, pursuing its commitment to growth and innovation within the global satellite communications markets.

Having a strong ESG framework in place enables us to share our good practices across all aspects of our growing business.

Our Environmental, Social and Governance framework is fully embedded into the three key goals of our business strategy:

- 1 Operational Excellence** - designing and manufacturing high quality products in the most efficient and sustainable way.
- 2 Sustainable Business Growth** - engaging with customers and suppliers to encourage socially and environmentally responsible business ethics amidst the growing market.
- 3 People and Culture** - equipping our employees to fulfil their potential in a safe, positive and inspiring workplace.





# Environmental

Reducing the energy, carbon and waste impact of our business is of critical importance to ETL. We are increasingly integrating environmental responsibility into our activities, from daily operations and processes through to long term business planning and investment. This is underpinned by our new Circular Economy Policy, launched in January 2025 and outlined on page 21.

We aim to reduce our environmental impact across the full life cycle of our products and services by engagement with suppliers; to propagate environmental responsibility throughout our supply chain.

**Page 6:** Commitment to Net Zero

**Page 7:** Carbon Footprint FY24

**Page 8:** Emissions intensity by scope (FY22, FY23, FY24)

**Page 9:** Emissions by aspect (FY22, FY23, FY24)

**Page 10:** Net Zero Reduction Targets - Carbon Intensity

**Page 11:** Carbon reduction focus actions

**Page 12:** Case study 1: Review of grid electricity consumption

**Page 13:** Case study 2 - Visible energy monitoring system

**Page 14:** Green Travel Scheme - case study

**Page 15:** Green Travel Scheme - uptake

**Page 16:** Electric Car Scheme

**Page 17:** Waste Management - overview

**Page 18:** Waste Management - case study

**Page 19:** Quality & Environmental Management

**Page 20:** Sustainable Procurement

**Page 21:** Circular Economy

**Page 22:** Product Design

**Page 23:** Manufacturing efficiency

## Commitment to Net Zero

ETL's Carbon Reduction Roadmap aims to reduce emissions year-on-year in line with NET Zero reduction targets. Our roadmap states a Net Zero target date of 2050 and target of a 70% reduction in CO2e emissions by 2033 (from the baseline position), with incremental targets each year and associated actions. This target has been set using the Science-Based Targets Initiative (SBTi) guidance. Key measures to achieve this include monitoring and reporting on energy use, identifying where savings can be made, increasing the overall efficiency of our operations and use of renewable energy.

As part of our Carbon Reduction Roadmap we are committed to:



### Measuring

understanding, and taking steps to reduce our own greenhouse gas emissions (Carbon Footprint).



### Reducing emissions

across all aspects of operations, including energy use, transport and travel, supply chain, financial investment, and waste.



### Influencing

stakeholders including suppliers, customers and staff to take steps to reduce emissions.



### Reporting

and publicising progress.

**Carbon Lens Ltd** have been working with ETL since June 2021 on their carbon management, by carrying out an annual Carbon Footprint Assessment and helping ETL set their carbon reduction targets and actions.

*The fresh perspective and expert advice from Carbon Lens has been invaluable in helping ETL to make progress each year; becoming more efficient and less carbon intense as the company grows.*

*"A real example of how net-zero planning can save money. We at Carbon Lens Ltd are really proud to have worked with ETL Systems and GridDuck to make these huge savings, resulting in reduced carbon emissions and energy costs. ETL have shown real commitment to emissions reduction across all their operations from energy to transport and supply chain. Not just committing to future targets but achieving real results year on year. GridDuck really do deliver savings. Well done all."*  
**Martyn Bromley Commercial Director, Carbon Lens Ltd**



# Carbon Footprint FY24

**↓17%** CO<sub>2</sub>e  
intensity reduction  
since FY22

## Emissions intensity in FY24 vs previous year:

### Scope 1

e.g. company facilities, company vehicles, fugitive (e.g. fuel, oil, gas)

CO<sub>2</sub> ↓ 4%

### Scope 2

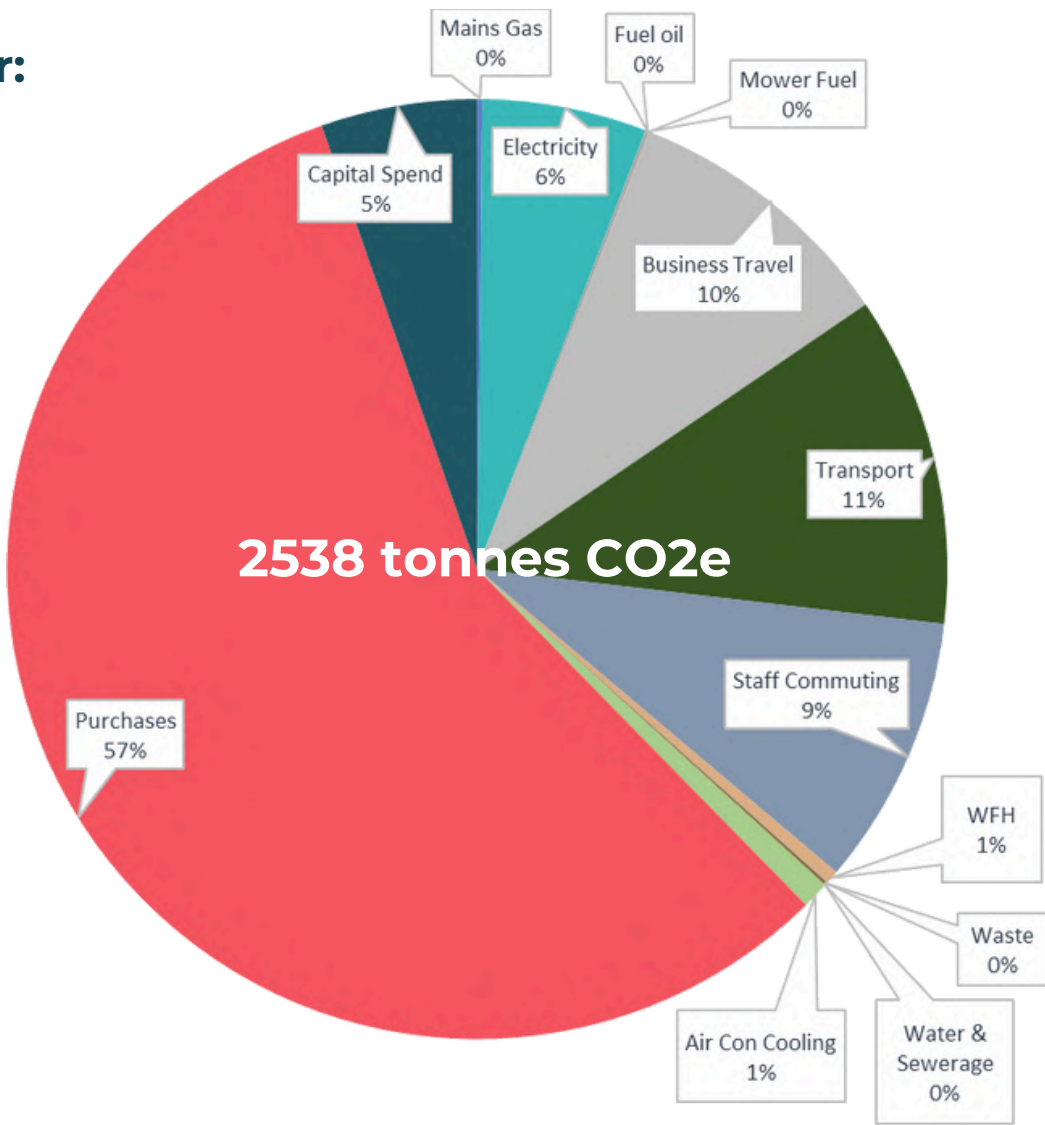
e.g. purchased electricity

CO<sub>2</sub> ↓ 17%

### Scope 3

e.g. purchases, capital goods, transportation and distribution, waste, business travel, commuting and WFH

CO<sub>2</sub> ↑ 4%



- Total emissions intensity in FY24 has reduced by 17% since FY22 indicating improved overall carbon efficiency.
- **Scope 1 and 2** emissions intensity has reduced year on year (FY22-FY23: 36.3% reduction and FY23-FY24 15.1% reduction for scope 1 and 2 combined). This is primarily as a result of significant energy reduction. (FY24, electricity reduced by 23.9 tCO<sub>2</sub>e; 14% reduction compared with FY23).
- **Scope 3** emissions intensity has increased (4.3%) in FY24. These are indirect emissions up and down the supply chain. Purchased goods and services and capital spend account for 66% of scope 3 emissions and 62% of total emissions. They rose by 9% in FY24, along with business travel, transport of product and staff commuting which have all increased as the business has grown.
- This has resulted in an overall 3% increase in emissions intensity from FY23 to FY24.
- Scope 3 reduction actions are the focus of our carbon reduction roadmap and it is anticipated that as we develop new products (such as Digital IF Technology), and as we make the business more scalable for future growth; carbon intensity emissions will reduce.

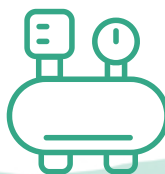
35

energy monitoring points on circuits at head office FY24 & FY25



54%

energy saving on major equipment through changing settings FY24



0.25

tonnes of plastic recycled separately FY24



57

Green Travel Scheme participants (42% up!) FY25



2

employees on new electric car scheme FY25



up to c. **40%** self-sufficiency from solar energy generated on-site for head office operational buildings FY24 & FY25





## Emissions intensity (tCO<sub>2</sub>e/£M revenue) by scope for last 3 financial years

Total emissions intensity has reduced by 17% since FY22 indicating overall improved carbon efficiency.



- **Scope 1 and 2** emissions intensity has reduced year-on-year; primarily as a result of significant energy emissions reduction. In FY24, electricity (across all scopes) reduced by 23.9 tCO<sub>2</sub>e; 14% reduction compared with FY23. Further details are on the next page.
- **Scope 3** emissions intensity has increased (4.3%) in FY23. These are indirect emissions up and down the supply chain. Purchased goods and services and capital spend account for 66% of scope 3 emissions, followed by transport of product (12%) staff commuting (10%) and business travel (10%).
- A break down of the carbon emissions from each scope is shown on the next page.

### Scope 1

#### Direct emissions made by ETL

- Company Facilities
- Company Vehicles
- Fugitive (e.g. fuel, oil, gas)

### Scope 2

#### Indirect emissions made by ETL

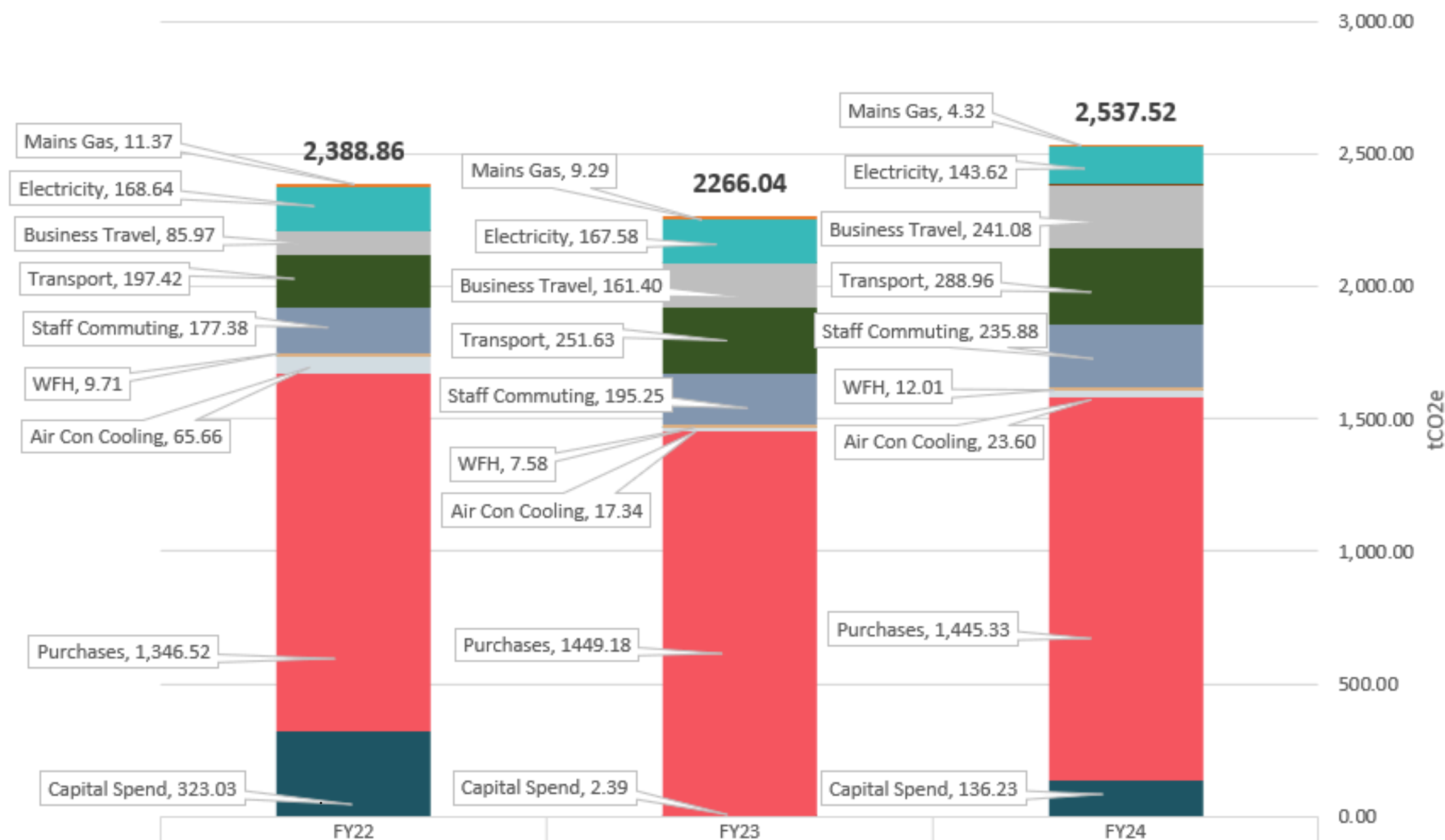
- Purchased electricity

### Scope 3

#### Indirect emissions up and down the supply chain

- Purchased goods and services
- Capital goods
- Fuel & energy related activities not included in Scope 1 or 2
- Upstream transportation and distribution
- Waste generated in operations and water
- Business travel
- Employee commuting and working from home
- Upstream leased assets
- Downstream transportation and distribution

## Emissions (tCO2e) by aspect for last three financial years



### Most significant emissions reduction in FY24

- Electricity emissions have reduced the most (23.9 tCO2e / 14% reduction). At our Herefordshire headquarters, the electricity consumption from the grid over FY24 reduced from 518,445 kWh to 442,209 kWh (76,236 kWh /14.7% reduction). Energy saving case studies from the solar panels and the energy monitoring system in Hereford are shown on page 12 and 13.

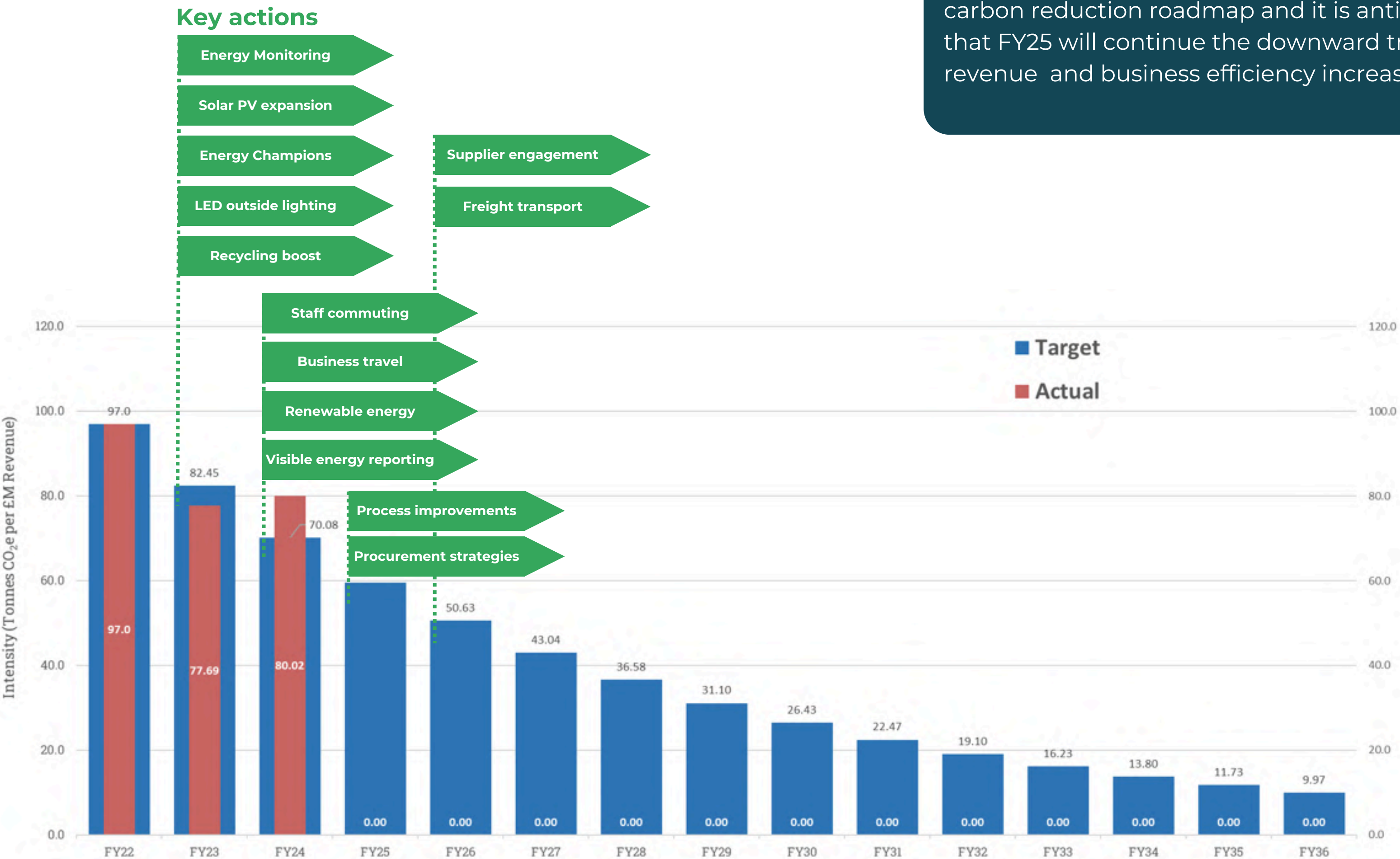
### Most significant emissions increases in FY24

- As the business has grown over FY24, emissions have increased from the following main contributors of emissions:
  - Purchased goods and services** and **capital spend** (62% of total emissions) - risen by 9%  
(These emissions fall into Scope 3 category)
  - Business travel** (10% of total emissions) - risen by 49%, driven by 60% increase in air travel - FY22 base line affected by COVID travel restrictions hence significant increase in subsequent years  
(99% of these emissions fall into Scope 3 category)
  - Transport of product** (11% of total emissions) - risen by 15% - more accurate data collection is a factor affecting the increase  
(These emissions fall into Scope 3 category)
  - Staff commuting** (9% of total emissions) - risen by 21% - affected by increase in headcount as business grows  
(These emissions fall into Scope 3 category)

The most significant emissions' increases are within Scope 3 which are emissions that we are indirectly responsible for and are more difficult to control.

It is important to highlight that improved and more detailed data collection in FY24 has also contributed to the rise in Scope 3 emissions.

Net zero reduction target - carbon intensity (tCO2e/£M revenue)



Scope 3 reduction actions are the focus of our carbon reduction roadmap and it is anticipated that FY25 will continue the downward trend as revenue and business efficiency increase.



Carbon reduction focus actions



2023/24 actions

Visible energy monitoring and reporting

Renewable energy

Recycling of soft plastic

Green Travel Scheme

Supplier Code of Conduct & Sustainable Procurement Policy

New Supplier On-boarding and Performance Monitoring Process launched with Risk Register

2025/26 actions

More energy reduction measures/targeted equipment

maximising use of renewables with monitoring and EV charging optimisation

Increased recycling on site with further segregation, support from recycling company and investment in plastic baler

Additional electric vehicle scheme open to all staff

Circular Economy Policy to minimise energy/resources through the entire product life cycle; from design, procurement, production, product in use, to end of life

Supplier Risk Assessments  
Supplier Monitoring Process development





# Case Study 1

## Review of grid consumption

**Location:** Hereford site

**Action:** Solar PV expansion and visible energy monitoring system installation

- **Analysis:** Grid consumptions across 2022, 2023 and 2024 at our Hereford site, to see the effect of our energy saving initiatives:
  - solar PV installation (May 2023)
  - visible energy monitoring (installed January 2024).

### Result



**35%**

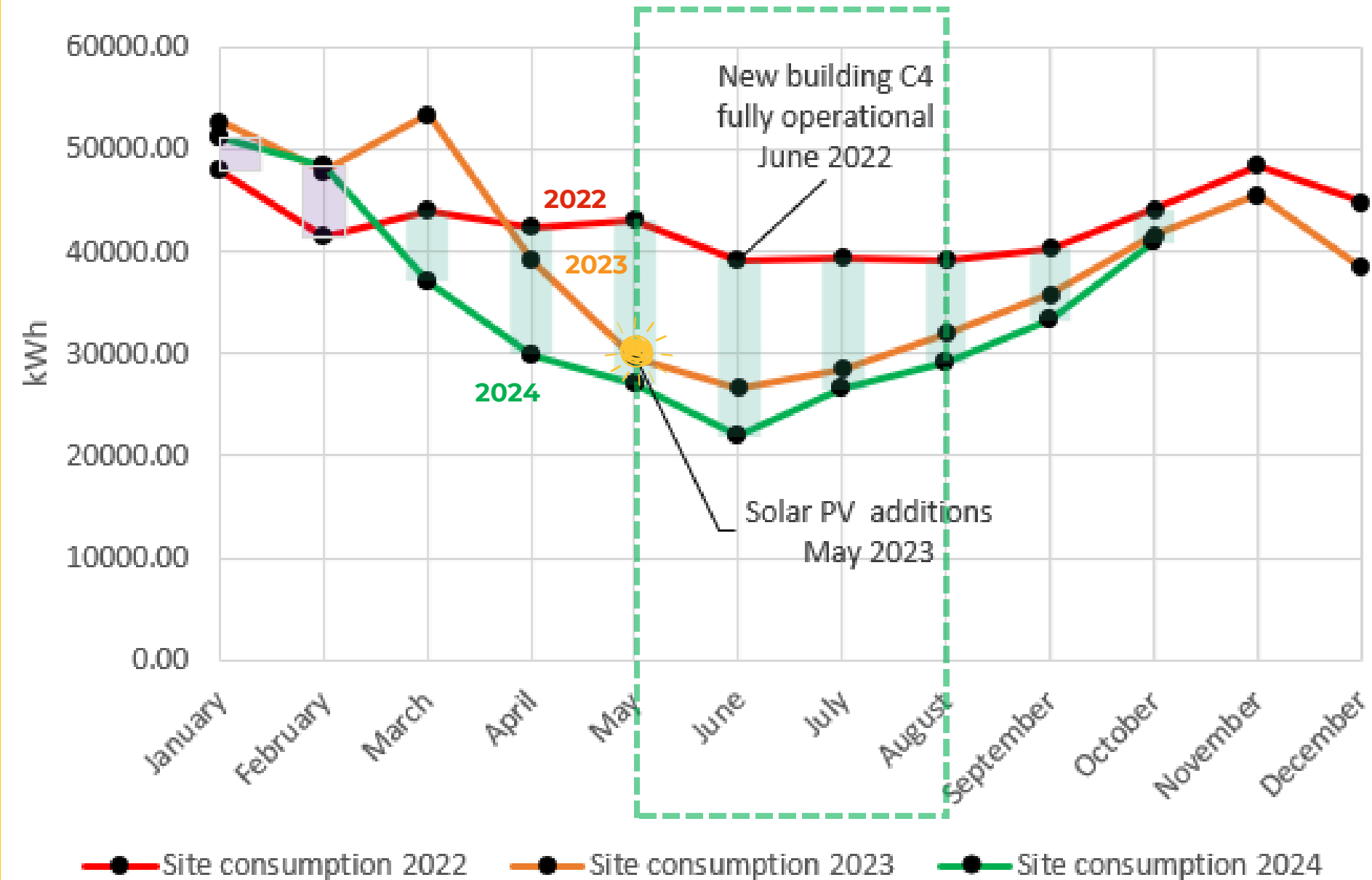
reduction in electricity consumed from grid from May to August in 2024 compared with 2022 in Hereford.



up to c. **40%**

self-sufficiency from solar energy generated on-site for head office operational buildings (FY24 & FY25)

Hereford site grid consumption in 2022, 2023 and 2024



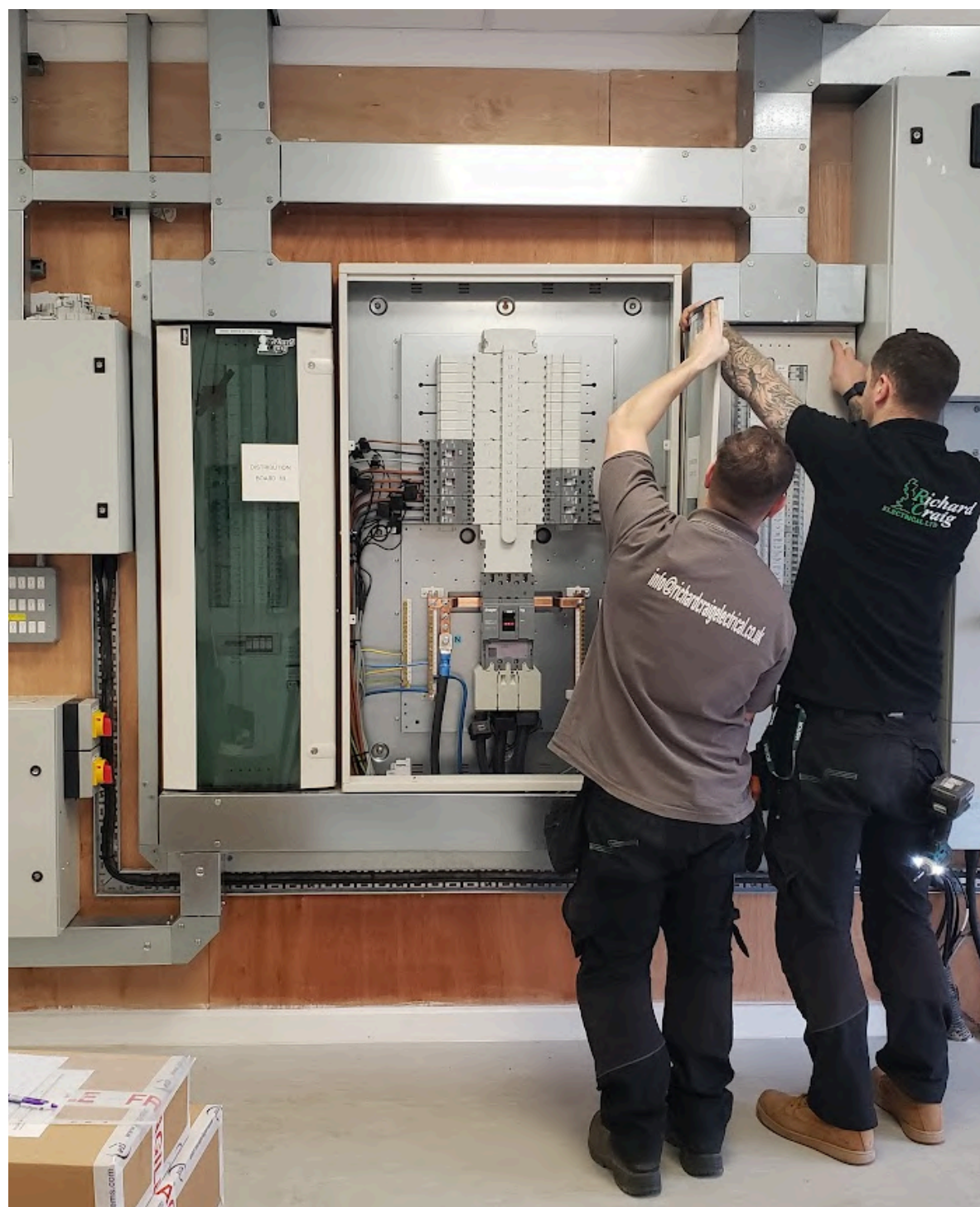


# Case Study 2

## Energy monitoring

**Location:** Hereford site

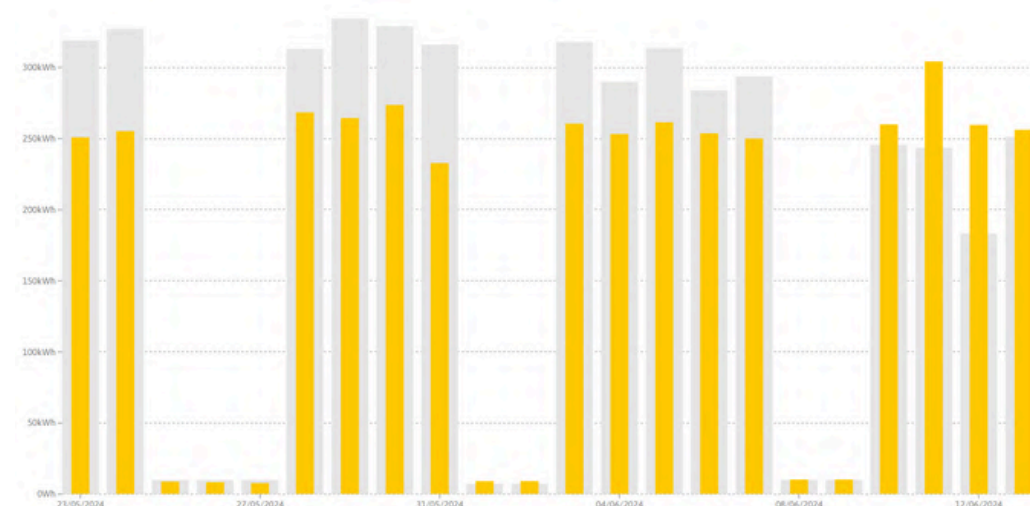
**Action:** Visible energy monitoring system installation in January 2024 at Hereford site



**Energy consumed by production distribution board**

**Action:** Changing reflow oven start up settings

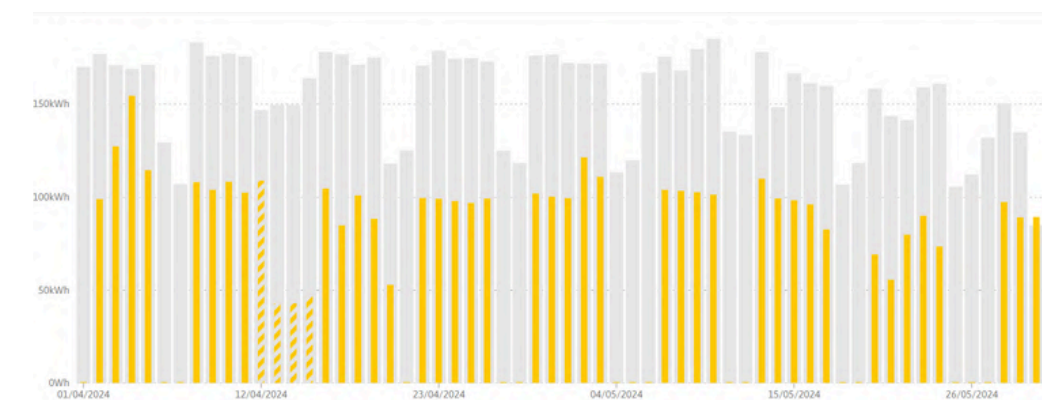
**36% reduction**  
between 6 AM and 8 AM (on a day before and after change)  
**10% reduction**  
on consumption over 21 days before and after change



**Energy consumed by compressor**

**Action:** Powering off compressor when not needed along with other key items of equipment

**54% reduction**  
in energy consumed by the compressor from 01 April to 31 May compared with 29 January to 29 March 2024 (61 day comparison)





# Green Travel Scheme

Encouraging employees to commute using eco-friendly modes of transportation is a key initiative at ETL, aimed at decreasing emissions and traffic congestion caused by single-occupancy vehicles. The Green Travel Scheme, initiated in 2022, promotes active travel, car sharing and the use of public transportation. A cycle scheme, bike racks, changing facilities, car share spaces and rewards for clocking up Green Travel journeys are in place to support this initiative.

## Cycling daily and earning rewards

Darren Offord, Customer Support Engineer, joined our **Green Travel Scheme** in August 2024. The Green Travel scheme was a great incentive for Darren to invest in a new bike which has been an incredibly beneficial way of travelling to work; increasing fitness, saving money and reducing vehicle emissions.

After expressing interest in cycling, Darren was advised by ETL's HR & Payroll Specialist Gemma Payne about the **Cycle2Work** scheme which he used to purchase a new bike through a salary sacrifice set up.

Since getting the bike Darren has cycled to work consistently and through logging his journeys on the Travel to Work Log he has received vouchers announced at ETL's quarterly company presentations

Darren is among around 57 participants of the Green Travel Scheme in FY25 who travel to work by active travel, public transport or car sharing, and receive vouchers if 10 or more journeys are logged in a three month quarter.

Read more in our Green Travel Scheme Report  
[https://www.etlsystems.com/wp-content/uploads/2024/10/Green-Travel-Scheme-Report-FY24\\_V1.0.pdf](https://www.etlsystems.com/wp-content/uploads/2024/10/Green-Travel-Scheme-Report-FY24_V1.0.pdf)



If an employee travels to work by one of the greener options (car share, active travel, public transport) 10 or more times in a three-month quarter, they will receive a voucher in the company presentation. There are also top prizes for the person who travels the most for each of the three greener travel options at the end of the financial year.



14

*"After a short winter break, I have just completed 525 miles, with 36 journeys and saved £65 in diesel. My fitness and well being have also benefited from cycling to and from work."*

**Darren Offord**  
**Customer Support Engineer**  
**March 2025**







# Green Travel Scheme

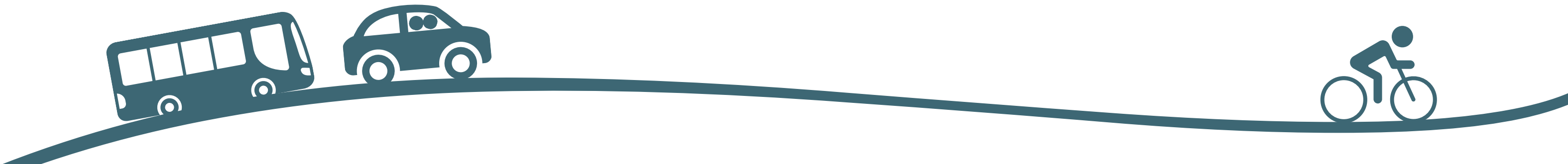
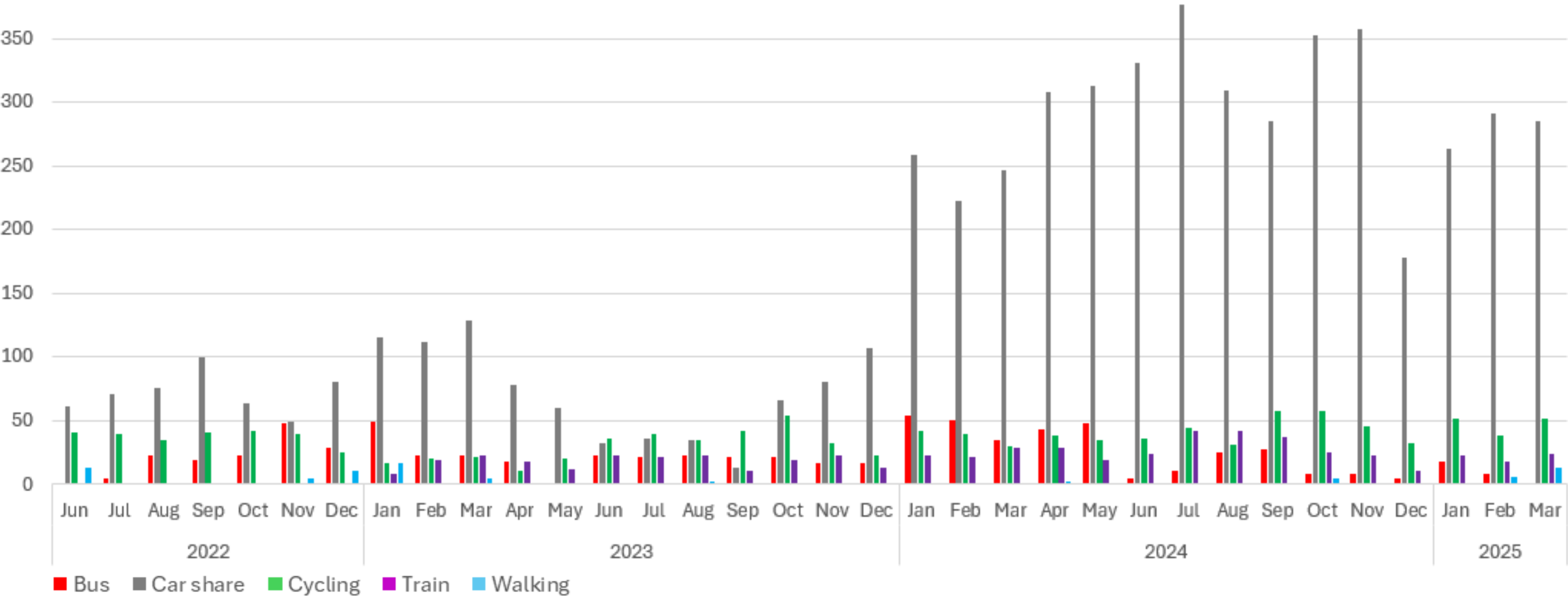
FY25 has seen a record number of employees joining our Green Travel Scheme, with 57 staff participating across the year compared with 40 in FY24 and 33 staff in FY23.

There has also been a 39% increase in the number of journeys recorded across FY25 compared with FY24.

	Journeys logged		Participants			
FY23	1728		33			
FY24	2785		+61%		40	+21%
FY25 to date	3877		+39%		57	+42%



Greener travel journeys logged by employees in FY23, FY24 and FY25 to date



# Electric Car Scheme

In January 2025 ETL launched an Electric Car Scheme, partnering with Tusker to provide car leasing to ETL employees. This new benefit allows employees to drive a brand-new, environmentally friendly car while saving money through salary sacrifice.

The Tusker Green Car Scheme is a salary sacrifice program that lets staff exchange a portion of their salary for a new car. This amount is deducted before income tax and National Insurance contributions, resulting in significant savings for both staff and the company. The scheme covers everything from comprehensive car insurance, road tax, breakdown cover, MOT, maintenance, replacement tires, even accident assistance. The only cost staff need to cover is fuel or charging.

## Benefits of the scheme:

1. Cost savings on tax and National Insurance contributions.
2. All-inclusive package: the monthly amount covers all car-related expenses apart from fuel or charging.
3. Environmental impact - reduced CO2e emissions
4. Range of green vehicle options with electric and hybrid cars available.
5. Ease of use and no unexpected costs, making budgeting easier.

## Staff Uptake

Since launching the scheme, two employees have made use of the scheme and are enjoying the benefits of driving electric cars.

## Energy savings

With on-site chargers outside building C4's production facility, and potential for this electricity to come from the solar PV, this is an energy saving solution for both staff and ETL.



*"I now have a bright (very bright) orange dodgem. The scheme was really easy to use and savings were good, net is about 25% less than I found privately leasing an electric car. The savings from charging vs fuel are significant."*

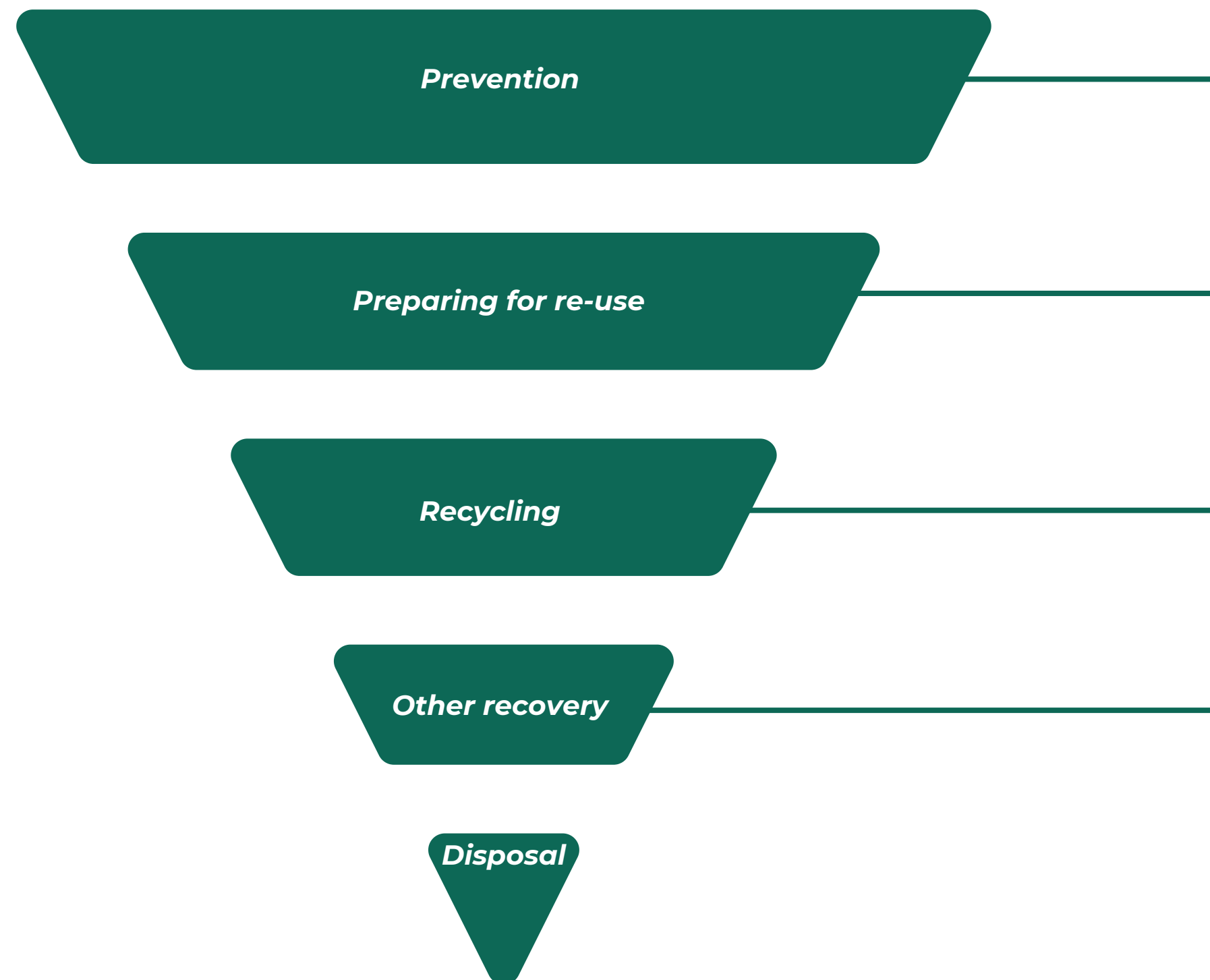
**Stuart Probert, Software and Electronics Technical Lead**





# Waste Management

ETL apply the principals of the “Waste Hierarchy” as per guidance from Defra and published on the UK Government Website\* to support decisions on waste management. The specific actions taken by ETL to either prevent waste, re-use materials, or recycle are outlined here.



## Actions taken by ETL



- Modular design of the GENUS product has **standardised and reduced the number of parts in the supply chain.**
- **GENUS chassis life is prolonged** because all active parts of the product are field replaceable and can be changed to provide low environmental impact upgrades .
- **Equipment life is also prolonged by support & repair services** with warranty packages. Equipment can be returned or sites visited for repair/ upgrade of equipment.
- **Re-use of product** (e.g. reconditioning of PCB boards)
- **Re-use of packaging**
- ETL's headquarters waste is streamered into **dry mixed recycling, food waste, soft plastic, foam, metal scrap, WEEE, hazardous and batteries.**
- Waste management actions are reviewed and implemented on site to increase recycling, such as the **installation of a baler** in 2025 to support **effective recycling of plastic and foam.**
- Fully recyclable card, sustainable timber and 30% recycled foam are used in **packaging**
- **General waste is recovered for energy via main waste contractor** (quantity is reducing as recycling waste streams increase)

ETL's main waste contractor at its headquarters operates at zero waste to landfill with waste being streamered into general (recovered for energy), dry mixed recycling and food waste.

This is in addition to separate waste streams and collections for the soft plastic, foam, metal scrap, WEEE, hazardous and batteries.

ETL works with waste contractors to strive to ensure that waste taken off site is managed in the most sustainable way and seeks traceability of recycling.

## Management of End-of-life of Waste Electronic Equipment

ETL offer customers the opportunity to return products for us to manage their end-of-life in line with our Waste Management process.

\*<https://assets.publishing.service.gov.uk/media/5a795abde5274a2acd18c223/pb13530-waste-hierarchy-guidance.pdf>



# Waste Management

*In FY25 ETL has taken significant measures to manage waste more effectively. We are committed to taking responsibility for whatever we generate; from the plastic packaging, foam and card board used in operations, to the food waste in the canteen. We seek to reduce and recycle as much as possible.*

- One of our key suppliers collects and reuses the packaging used to supply the parts to ETL.
- We have implemented additional segregation of food waste at Hereford and Rickmansworth, in addition to the existing dry mixed recycling.
- We have also built on the the plastic and foam segregation that we started in 2023, by investing in a baler to compact the material on site before it is collected for recycling. This reduces the frequency of collections and makes it easier to store.

## Plastic and foam recycling management

Since the end of 2023, our Production and Stores Teams have been diverting plastic bubble wrap, soft plastic and foam from general waste and storing for separate recycling. In FY24 we diverted 253 kg (73 bags) of bubble wrap, soft plastic and foam for recycling by our local waste contractors, Wye Valley Group and we arrange collections intermittently throughout the year.

This initiative was a direct result of feedback from our Production and Stores Teams who saw an opportunity for diverting plastic waste for separate recycling.

We have continued to build on this in FY25 by renting a compactor that bales the plastic and foam; condensing it into more manageable bales. This enables us to store the plastic on site more effectively and reduces the frequency of collections required.



**On-site plastic and foam baling process**



## Quality & Environmental Management

*In ETL's design and manufacture of communication and RF equipment for satellite earth stations, we strive for the highest standards of quality, high performance, and positive environmental impact.*

*We take responsibility for the direct and indirect impacts of our activities upon the environment and people; from the way that we operate our sites, to the services we provide to our customers.*

*Operating under **ISO 9001 Quality Management System** and **ISO 14001 Environmental Management System** supports the continuous review and improvement of our processes and the way that we operate.*



*"The **ISO surveillance audit in Hereford, March 2025** went very well - we had zero non-conformities, and four opportunities for improvement. I'd like to extend my thanks to everyone who participated. As with previous years, the auditors were very impressed with the atmosphere on-site and this was raised specifically in the closing meeting as a positive aspect."*

**Ben Bateson (Quality Manager)**

***"The organisation has established, implemented, maintained and continually improved its management system. ETL Systems continues to:***

- *update their processes,*
- *seek out better suppliers,*
- *increase customer offering of products through acquisitions,*
- *improve employee welfare facilities,*
- *support employee development opportunities and remuneration.*
- *ETL has invested in energy efficiency through monitoring equipment and installing solar panels on all roofs on site."*

**Extract from NQA Surveillance Process Audit Report for ETL Systems Ltd - 18/03/2025**



### **Internal audit team**

In January 2025, our Quality Manager Ben Batson trained two new internal auditors to strengthen the existing team that work alongside Ben to help ensure we are compliant and following protocols across the business. Internal audits carried out annually include:

- Purchasing
- Dispatch
- SMT
- Sales & Marketing
- Customer Support
- Assembly
- Test
- Anti-bribery and corruption



# Sustainable Procurement

ETL's sustainability strategy aims to develop, manufacture, and deliver innovative products with the lowest possible environmental impact and suppliers are encouraged to support this wherever possible. Sustainability initiatives – such as carbon footprint reduction, reduced resource consumption and emissions, waste minimisation, recyclable packaging materials and reduced emissions – will be factored into supplier selection and approval.



## Sustainable Procurement Policy

ETL is committed to operating in a responsible and sustainable way. As a design and manufacturing company of RF technology solutions, embedding this into our procurement process is key to sustainable business growth. Our **Sustainable Procurement Policy** sets out our approach to procurement across the following key areas

- 1 **Propagating a responsible approach** to business through our supply chain
- 2 **Identifying and mitigating risks** associated with our procurement process and within our extended supply network
- 3 **Upholding business ethics** in our dealing with suppliers; including the laws and regulations of the respective countries we operate in and procure from
- 4 Managing and **reducing the environmental impact of what we buy**
- 5 **Upholding human rights and worker rights** in our supply chain

### Policy link:

<https://www.etlsystems.com/corporate-responsibility/>





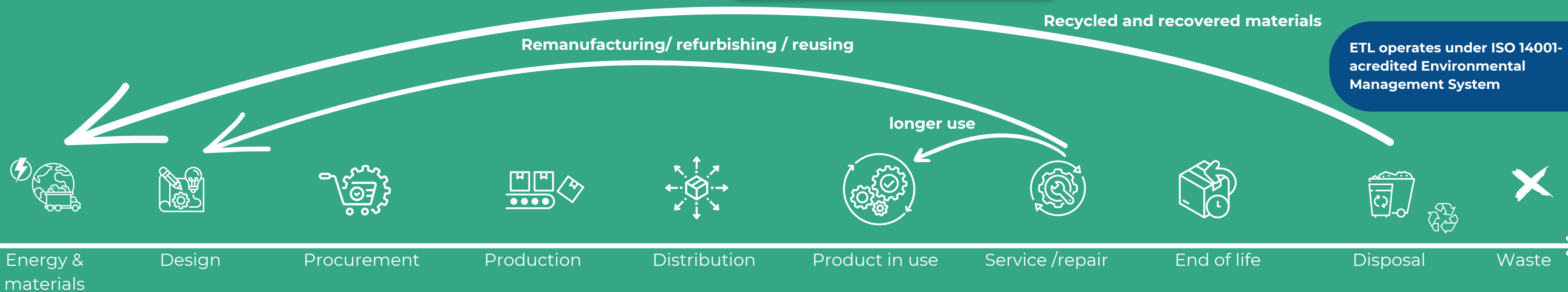
# Circular Economy Policy

ETL is committed to minimising the energy and resource consumption of the products that we design and manufacture. The launch of our **Circular Economy Policy in FY25** outlines our framework to achieve this against each aspect of the **product's life cycle**, as summarised in this diagram. The objective of this framework is to instil processes that achieve the following:

- **reduce waste and pollution**
- **circulate products and materials**
- **regenerate nature**

As a result we aim to minimise our impact on climate change, biodiversity loss, waste, and pollution. Read the full policy at

<https://www.etlsystems.com/corporate-responsibility>





# Product Design

*The key features of ETL's GENUS product range bring incredible environmental benefits; with a modular design that has standardised and reduced the number of parts in the supply chain and an easily upgradable solution. The GENUS range is a great example of ETL's commitment to minimising energy and resource consumption by considering environmental impact throughout the entire product life cycle, from initial design through to end-of-life.*



## GENUS Habitat

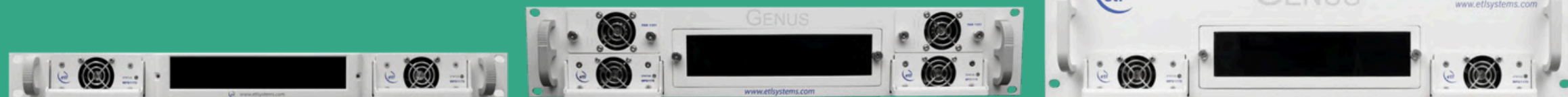
### Compact, modular, and future-ready RF distribution

The GENUS smart chassis by ETL Systems represents the latest advancement in chassis technology, offering a compact, **modular**, and **flexible solution** for growing teleport operators.

Available in 1U, 2U, and 3U rack sizes, the GENUS chassis can accommodate up to 17 RF distribution modules, allowing operators to customise their setup according to their specific needs.

This modularity provides a high degree of adaptability, making the GENUS smart chassis an ideal choice for operators looking to **scale their operations efficiently and effectively**.

The smart chassis concept allows for the housing of multiple RF modules within the same shelf, providing space savings, reduced costs, and increased rack space efficiency. The GENUS smart chassis offers improved overall RF performance and introduces new features such as hot-swappable components, expanded compatibility with RF modules, enhanced security protocols, and improved local control and monitoring capabilities via a front panel touchscreen interface.



**The GENUS range demonstrates how ETL designs products to minimise energy consumption with the following key features:**

- **Maintainability** – field replaceable active parts (by the end user) - resulting in prolonged chassis life.
- **Upgradeability** – modular system - small elements can be changed to provide low environmental impact upgrades
- **Modularity** – this has standardised and reduced the number of parts in the supply chain.



***“Scalable and modular, GENUS adapts to evolving system needs for long life and lasting value”***

*Simon Swift Engineering Director  
- Digital Technologies*





## Scaling up the energy savings

In FY24 after changing the start up setting of two of our SMT ovens to sequential, we saw around a 36% reduction in energy consumed by our production distribution board between 6AM and 8AM. We continued to operate our two ovens on this setting in FY25.

In FY26 we are planning to replace our third and oldest SMT line oven with a new oven that will also enable a sequential start up and operate more energy efficiently.



*“As of 23 May 2024 we have set the start-up of the ovens to sequential. When the oven reaches a certain temperature the second half of the zones will switch on. As there is residual heat from the first set of zones, the second set will get to temperature quicker. Overall, it will take longer for the oven to get to temperature (by about 10 to 15 mins) but the power consumption should be considerably less.”*

**Steve Uppington (Production Engineering Manager)** commenting on changing the start up setting of two SML line ovens in Production.

*“The automated cable machines at our Hereford HQ will enable us to make cables in house; improving efficiency and lead times, as well as reducing shipments.”*

**Dan Matthews – Production Engineer**

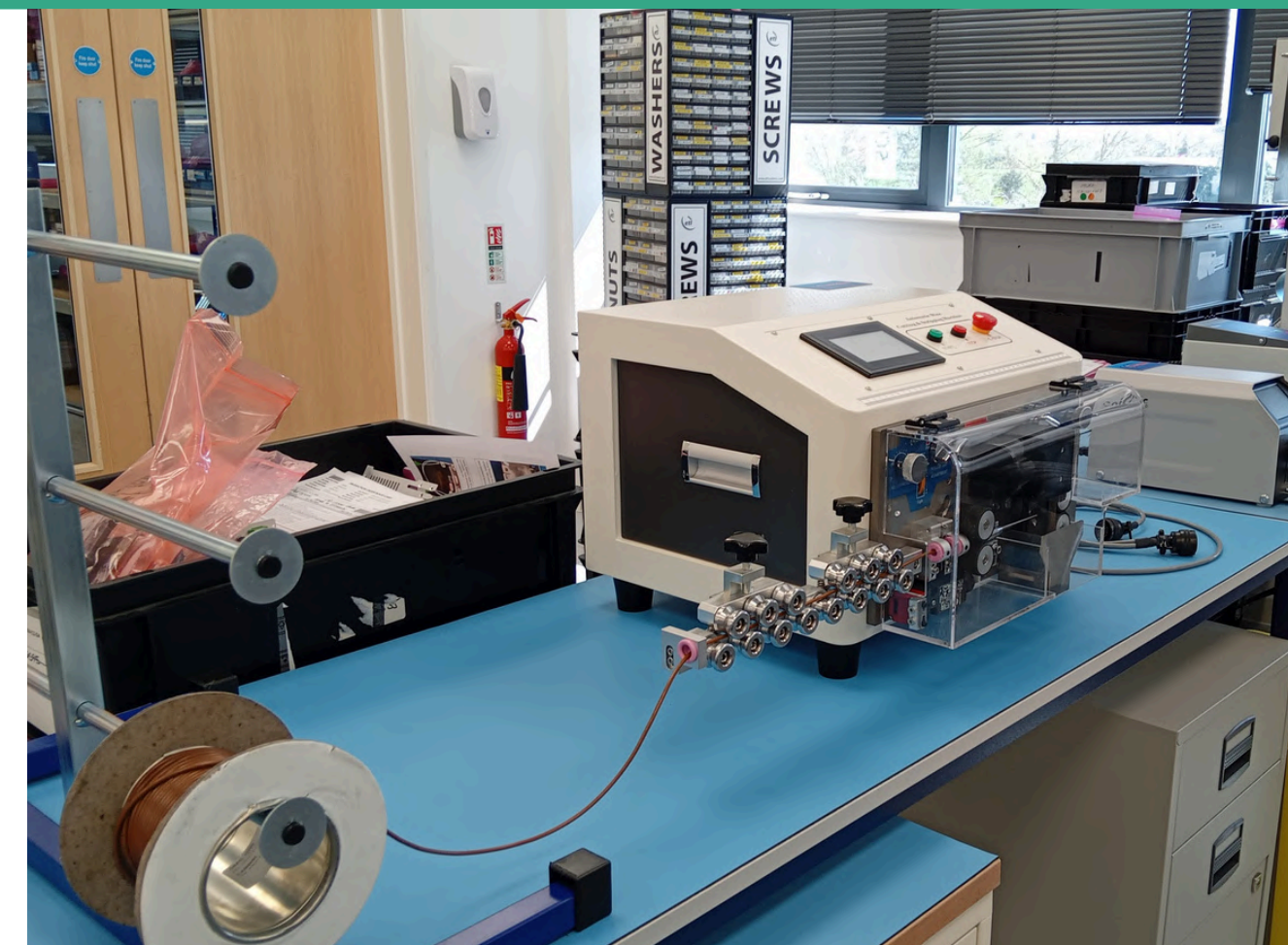


## Expanding in-house capability

ETL's investment in automated cable machines in FY25 enables us to make cables in-house instead of outsourcing these essential elements of our products.

This is an example of how ETL's expanding in-house capabilities are increasing efficiency by for example, reducing the number of shipments in the manufacturing process.

**Having the ability to share these manufacturing capabilities across all our sites supports our sustainable business growth.**





# Social

ETL's people have made the company as it stands today, and each member of staff is highly valued. As well as providing a safe and inclusive environment, we are committed to supporting employees in developing and maximising their career potential so that they can thrive at work.

ETL's commitment to its staff is reflected in obtaining "Great Place To Work" certification since 2023.

We also strive to be a valued partner to our communities, with positive and growing relationships with local education establishments and charities.

**Page 25:** Health and Safety

**Page 26:** Training and development - Learning Lounge

**Page 27:** Training and development - technical courses

**Page 28:** Leadership training

**Page 29:** Business expansion

**Page 30:** Internships at ETL

**Page 31:** Employee surveys

**Page 32:** Employee Forum

**Page 33:** Employee events

**Page 34:** Community engagement

**Page 35:** Fund raising initiatives



# Health and Safety

Health and Safety is integral to how we do business as a responsible employer; ensuring that we provide a safe and healthy working environment for our staff whilst at work and others who could be affected by our work activities.

ETL's H&S Policy details our commitment to managing H&S in line with best practice across all our business activities. The policy sets out our commitment to manage risks, eliminate hazards and to meet our legal duties under the Health and Safety at Work Act 1974 and the Management of Health & Safety at Work Regulations 1992 together with all relevant subsidiary legislation.

ETL actively monitors H&S performance, with H&S statistics as a standing item on the Board Agenda. There is a dedicated H&S Team, including Officers, Fire Marshalls and First Aiders. H&S training is provided to ensure all staff are able to carry out their work safely. H&S Review meetings are carried out and any observations for improvement or non-conformities are recorded and addressed.

Accidents, incidents and near misses are recorded, reviewed at Board Level and corrective action is taken if required. Applicable cases would be reported to HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).



## Fire Marshall teams

A dedicated team of Fire Marshalls have undergone Fire Safety Training.

## Near Miss Reporting Process

To reduce the risk of accidents, we actively encourage prompt and fast reporting of near misses. In addition to the Near Miss Books, we have a dedicated mailbox that is monitored by H&S representatives who follow the Near Miss Reporting Process of completing the Near Miss Form, logging the incident on the restricted Near Miss Log, and identifying and completing correction action required.

## Risk Assessments

Risk Assessments for business processes identify any “Additional Controls Required”, along with due dates for closure. These actions are monitored by relevant staff and reviewed in quarterly H&S meetings to ensure any potential H&S risks are minimised. Risk Assessments are in place for the following processes

- Assembly & Integration
- Finance
- Hardware Design
- HR
- IT
- Logistics and Dispatch
- Marketing
- Planning & Scheduling
- Production Support
- Purchasing & Inventory
- Sales
- Site Management
- SMT
- Special Projects
- Systems Engineering, Software & DIF
- Test & Measurement

## Mandatory H&S Training Courses launched in Learning Lounge in FY25:



- Site Security
- Display Screen Equipment (DSE)
- Manual Handling

Accident and near miss stats - FY25			
	No. accidents reported	No. near misses reported	Corrective action taken
June 24	1	0	Yes
July 24	0	0	
August 24	1	0	Yes
Total Q1-FY25	2	0	
September 24	0	0	
October 24	0	1	Yes
November 24	0	0	
Total Q2-FY25	0	1	
December 24	0	0	
January 25	1	0	Yes
February 25	0	0	
Total Q3-FY25	1	0	
March 25	0	0	
April 25			
May 25			
Total Q4-FY25			
Total FY25 (to date)	3	1	



# Training & development

ETL's company wide **Learning and Career Development Strategy** has been led and implemented by Jess Winn (Learning and Development Business Partner) with the big drive in FY25 being the launch of ETL's e-learning platform.

The ETL Learning Lounge delivers training consistently across the business, covering mandatory core training; such as Health & Safety, GDPR, Cyber Security, Preventing Bribery in Business, alongside personal development training.

It ensures that mandatory compliance training is delivered in a systematic and auditable way.

Compliance modules are to be completed within the first month of joining ETL for all new employees.



*"In addition to the mandatory compliance courses it's great to see that so many people have enrolled themselves onto courses for their own personal development"*

Jess Winn (Learning and Development Business Partner)



*"I found the 'Looking After your Mental Health' course very informative and well-structured. I can sometimes let stress and workload get on top of me but I think the course gave me some key points to think about and tools that can help to not let me get bogged down. When I have more time I would like to complete more personal development courses like emotional intelligence, being kind to yourself and handling stress."*

**Talia Wheeler - Marketing Executive**



*"The Influencing Teams course was a good refresher on DISC profiles and how to best approach and organise team projects."*

**Ella Phillips - Assembly Manager**



*"I found the Learning Lounge courses to be quite valuable particularly the personal development/leadership courses. My role requires me to interact with different people around the business and some of the courses have helped with adjusting my approach to certain situations."*

**Dan Matthews – Production Engineer**



## 2001

Learning Lounge training modules completed in FY25 (of which 1643 were mandatory compliance courses)

## Training & development



*In addition to The Learning Lounge, we're also looking out for other sources of quality e-learning content. **Udemy** has been identified as a great option, particularly when we are looking for more technical content. ETL employees are encouraged to speak to their manager in first instance, if interested in enrolling on a Udemy course.*

### Udemy courses purchased in FY25:

The Complete Networking Fundamentals Course. Your CCNA start  
 AZ-900: Microsoft Azure Fundamentals Exam Prep  
 Mastering Practical Algorithms: Project Euler Challenges  
 RF Concepts, Components and Circuits For Beginners  
 Learn to Repair & Troubleshoot Electronics  
 Oscilloscopes for beginners  
 Business Writing & Technical Writing Immersion  
 Microsoft Visio 13/16/19 Like a Boss - The Definitive Course  
 Complete VMWare vSphere ESXi and vCenter Administration  
 Budgeting for Business  
 Awesome Operational Amplifier Course  
 100 Days of Code: The Complete Python Pro Bootcamp  
 Complete PIC Microcontroller Course from Zero to Hero  
 Quick Start with PIC32 Microcontrollers  
 Rust: The Complete Developers Guide  
 Fundamentals of Heat Transfer Part 1  
 CompTIA Project+ (PK0-005) Complete Course & Practice Exam

*"The **Complete Networking Fundamentals** course is very helpful and informative. Being online videos makes it easy to use and has the benefit of being able to review parts whenever you want. The course includes quizzes and software lab sessions which help with further learning/understanding."*

**Thomas Protheroe**  
Lead Pre Sales Engineer



*"The current course I'm enrolled in (**Electronics PCB design**) is interesting and the tutor for the course keeps things engaging. I do look forward to carrying it on and hopefully using some of the things I've learnt from it in the future."*

**Ben Woolley**  
Senior Production Technologist



**32**  
Udemy courses  
completed  
(FY25)



## Leading with a Purpose

In April 2025, all ETL leaders returned for the final module of *Leading with a Purpose*, a three part learning programme designed to equip all people managers with key leadership skills, focusing on the following topics:

- *Elevating Performance*
- *Managing Change*
- *Self-Awareness*
- *Management Foundations*
- *The Importance of Communication*
- *ETL People Processes*
- *Teamwork*
- *Delegation*
- *Managing Challenge Effectively*
- *Employee Recognition*

*I am grateful to be participating in ETL's Leading with a Purpose offsite management development programme. So far, we have covered modules 1 and 2, with module 3 scheduled for the end of April which I am looking forward to! This programme allows me to have a working day out of the office to solely focus on developing my leadership skills and engage with other leaders. We have explored topics such as communication, performance management, providing feedback, coaching, change management, and understanding our individual leadership styles.*

**Alice Collis (Sales Operations Supervisor)**



*During the November training, I gained valuable insights into the role of a people manager, and how important it is to lead with clarity and empathy. I learned how effective communication and well-structured emails can make a big difference in daily reactions. We also focused on how to raise performance through coaching and feedback, as well as how to use motivation techniques for different DISC profiles. These tools will help me better support and develop my team.*

**Agata Gargala SMT Manager**



*As well as providing core mandatory compliance training in key areas, we invest significantly in training to support individual career development goals such as leadership and development, technical development, and digital marketing.*



# Business expansion

ETL Systems acquisition of SpacePath Communications and IRT Technologies in FY25, marked a significant milestone in the company's growth within the global satellite communications sector.



## Opportunities for growth and collaboration

SpacePath Communications has earned a strong reputation for its high-power amplifier (HPA) technology and customer focused approach. The integration of SpacePath's esteemed team into ETL Systems brings a wealth of experience and technical excellence.

The acquisition not only reinforces ETL Systems' position as a leader in the UK satellite communications market but also creates new opportunities for employees across both organisations. **This expansion underscores ETL's commitment to fostering career progression and personal development.**

Colin Bolton, co-founder and Director of Business Development at SpacePath, remarked: "We are excited to join forces with ETL Systems, a company that shares our commitment to innovation and customer service. This acquisition presents a tremendous opportunity for our team and clients alike, as we combine our strengths to deliver even greater value in the satellite communications market."



## Delivering innovative solutions to customers worldwide

IRT Technologies designs and manufactures satellite communication components including block upconverters, solid state power block upconverters, and solid state amplifiers. IRT Technologies also focuses on the high and low power tropo-band solid state power amplifier market.

*"The acquisition of IRT Technologies enhances our ability to serve customers across North America and solidifies ETL Systems' leadership in the global satellite communications market. This strategic move strengthens our product portfolio and creates exciting opportunities for innovation and growth. Together, we will continue to deliver industry-leading solutions and exceptional service to our customers."* Kevin Dunne, CEO, ETL Systems

*"We are thrilled to join ETL Systems and leverage their global reach and industry expertise. This acquisition opens up new opportunities for our team to expand our offerings and provide even more innovative solutions to customers worldwide. We look forward to this new chapter and the opportunities it brings."*

Amir Motiuk, CEO of IRT Technologies





# Internships at ETL

In June 2024 we launched a Summer Internship Programme; with five interns working in Test, NPI, SMT, Assembly and Production departments at ETL. Hearing from our first cohort of interns gives a real insight into what it's like to work at ETL



“Our Summer Intern Programme supports future career ambitions by giving experience in the commercial world of RF engineering and manufacturing. The selection process is incredibly challenging with a wealth of applications from very enthusiastic and talented individuals. We have a Summer Placement Assessment Event at our Herefordshire site for applicants, where they engage in an interactive skills assessment, an interview panel, and a tour of our manufacturing facilities.”

**Barry Tapping (Talent & Early Careers Business Partner)**

5 internships (FY25)

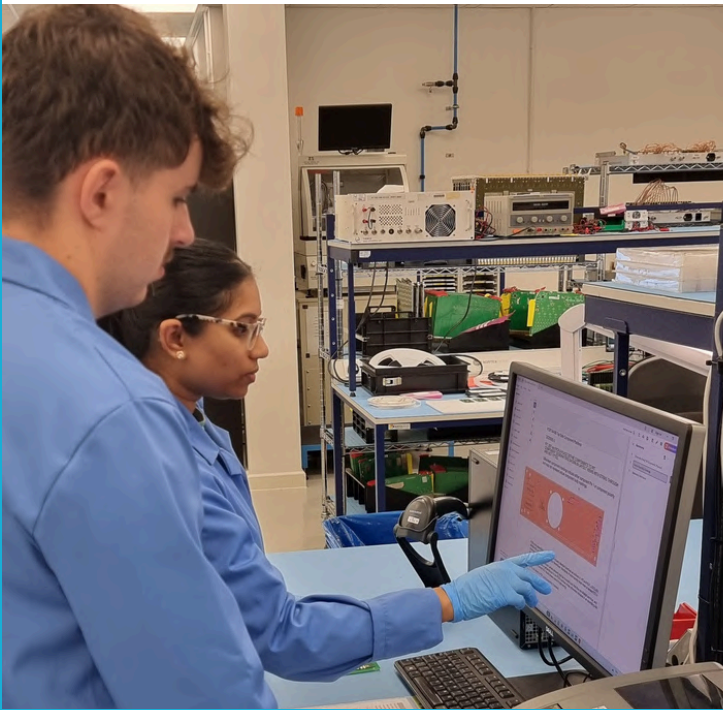


“Sam’s talents have already made a significant impact. Under the guidance of our SMT Lead, Sam’s ability to quickly learn new skills has earned him well-deserved recognition”

**Comment from our Talent & Early Careers Business Partner about Sam Camden, SMT Intern**

“If you’re looking to start a career in Electronics and Manufacturing, I would highly recommend going to ETL Systems. Everyone at ETL is extremely kind and helpful, they make sure you get settled in nicely and that you know what you’re doing from the start. The atmosphere at ETL is also very relaxing and supportive. During my time as a Manufacturing intern at ETL I was taught a lot of useful skills.”

**Tudor Samoilescu Assembly Intern**



**Tell us about the department you’ve been working in?**

I’m working on a project in the Digital RF Team.

**What new skills and experiences have you picked up so far?**

I have learnt about the different standards and usages on 100 Gigabit fibre connections

**What has been a highlight of your experience?**

Going to the Summer Party, meeting people and visiting the facilities. Then going back to Hereford to test and configure devices.

**Pierre-Antoine Garner, Digital Technologies Intern**

“Being part of ETL’s Test Department has allowed me to expand my knowledge on RF electronics and how they are tested. It has made me realise how important testing is, in the manufacturing process of an RF component or assembly. I would like to continually broaden my skills and eventually go on to find a specialised or multi-skilled engineering role once I finish my degree. So, this opportunity lays the essential foundations for the use of testing equipment like VNAs, how to troubleshoot adequately and working with a team that coordinates with multiple other departments”

**Toby Taylor, Test Intern**



**What new skills and experiences have you picked up so far?**

The biggest one has to be LabVIEW, an IDE for a visual programming language. We use it for all kinds of things - talking to our lab equipment, data acquisition/ manipulation. I’ve also learnt how to use laboratory equipment - mainly Vector Network Analysers (VNAs) and Spectrum Analysers

**What has been a highlight of your experience so far?**

The game of rounders at the summer party is a personal highlight - unfortunately my team lost by the barest of margins, but it’s a great example of the wonderful culture here at ETL”

**Sam McKay NPI Intern**



# Employee surveys

Staff feedback is critical to understand where improvements can be made across the business.

ETL carries out an employment survey using an independent third-party framework ('Great Place To Work') covering various aspects of work life - from job satisfaction to interactions with the leadership team and colleagues. In addition, training feedback and evaluation are carried out throughout the year.



"Our continued focus as we move into FY25 is to further develop our culture, fostering a positive and inclusive workplace. This remains a core priority, and we are dedicated to making ETL a great place to work for everyone. We are committed to empowering our team members by providing opportunities for personal and professional development. By supporting exciting career growth, we aim to help each individual reach their full potential. Together, we will build a workplace where everyone can thrive and achieve their career aspirations"

**Joanna Gower**  
(Director of HR, People & Culture)

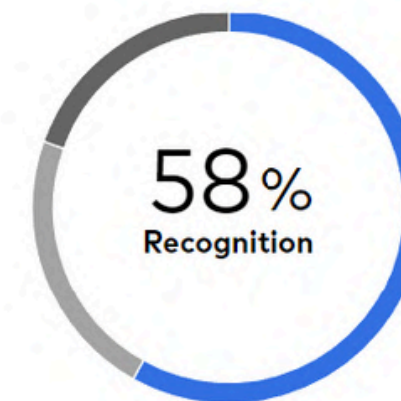
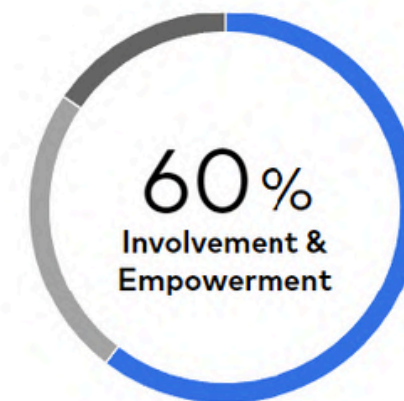
In FY25 we attained our second year of "**Great Place To Work**" certification (Nov 24 – Nov 25)., with 69% of staff recommending ETL as a great place to work.

The survey results Identified where we are doing well; with a safe (93%) and welcoming (86%) work place, and highlighted actions for improvement with three key focus areas below.

80% of employees responded to the survey



## Action areas for improvement



In January 2025 we held follow-up **insight listening workshops** to support our areas for continuous improvement. Over 40 employees from all areas of the business provided feedback and suggestions for our company action areas for 2025. The actions we are focusing on will be **empowering our teams** and **celebrating success**.



# Employee Forum

The ETL Employee Forum launched in March 2023 gives representatives from all areas of the business a platform to openly discuss, debate and voice opinions.

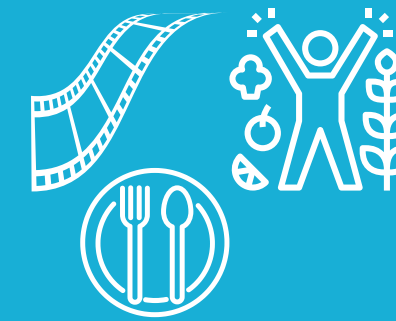
The Forum is a good channel for communicating ideas and feedback and deciding on actions that can be taken to support continuous improvement at ETL and the wellbeing of staff.



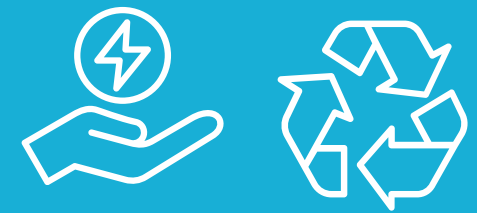
## Feedback from focus actions implemented in FY24

32

"The **buy and sell holiday scheme** gives extra flexibility in fitting work around my life."



"ETL's **Flexible Working Policy** with flexible start and finish times enable me to do the school run before work"



"One of the great things about the **People Perks** on offer through the Salary Extras Scheme is the discounted cinema tickets which add up to quite a big saving at the end of the year"

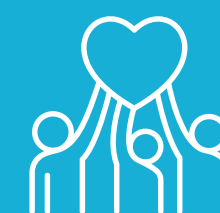


"It is amazing to see what we have done as a company to **reduce energy consumption** by simple actions such as turning off equipment when it doesn't need to be on."

## Focus actions implemented in FY25



Employee Health Cash Plan launched in December 2025



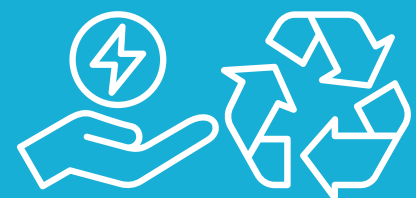
New focus charity with launch of ETL Cares (FY25)



Electric Car Scheme (FY25)



Increased holiday allowance rolled out to all employees (FY25)



Continued energy reduction drive



# Employee events

ETL places significant value on employee events; to strengthen teams, support planning, or to simply enable staff to have some time outside of their normal work routine.

The annual **Global Sales Conference, Engineering Conference** and **Production Conference** bring together teams from various locations to foster collaboration towards departmental goals and roadmaps.

**Company-wide events** unite people from all across the business and serve as a token of appreciation for each member of staff.

Lynn Shaw (Facilities Manager) leads the planning and coordination of ETL events and makes each one unique, with a whole array of different activities; from lively caricatures and rounders games at the Summer party, to fun filled themes at Christmas.

## Department specific events:

- Global Sales Conference (June)
- Production Conference (July)
- Engineering conference (October)
- Off site Strategic Planning

NEW!

## Company wide events:

- Summer BBQ
- Christmas Party
- Staff appreciation days
- Company presentations (quarterly)



Employee surveys help understand what worked and what can be improved upon for future events

***“The game of rounders at the summer party is a personal highlight - unfortunately my team lost by the barest of margins, but it’s a great example of the wonderful culture here at ETL”***

***Sam McKay NPI Intern***





# Community engagement

*In FY24 we supported seven local charities nominated by staff to receive a proportion of our Charity Fund, led by our Charitable Donation Committee.*

*This initiative not only provided staff with insights into the charities' missions, but also encouraged them to show support in other ways.*

*We have developed this outreach work in FY25 through the launch of **ETL Cares**. We plan to select a focus charity each year with an emphasis on community outreach through fundraising, volunteering, and support initiatives. This is an opportunity for all staff to get involved in supporting our communities.*

## ETL CARES



## Nominations

We received three nominations for fantastic charities that were put to the Forum Representatives for a deciding vote.

## Focus Charity

Our focus charity for 2025 is **The Little Princess Trust**; a national charity that provides free real hair wigs to children and young people who have lost their own hair through cancer treatment and other conditions.

We are excited to support The Little Princess Trust throughout the year with a range of fundraising, volunteering, and support initiatives.

The Little Princess Trust provides free real hair wigs to children and young people, up to 24 years old, who have lost their own hair through cancer treatment or other conditions. They also fund childhood cancer research, searching to find kinder and more effective treatments.

In February 2025 a small team from ETL visited The Little Princess Trust HQ to learn a little about the amazing work they do. In addition to their office and warehouse space, they also have a specially equipped salon for young people to have their wig fitted and styled by a professional.

### Here's some of what we learnt on our visit:

- Each wig costs £700 to make.
- It takes about 60 hours to create each wig, as they are hand-tied.
- Hair donations are sent to Hereford from all over the world!







## Fund raising initiatives

Our Forum Representatives are exploring a whole range of fundraising ideas, with sponsored walks and races, spinathons, and any other ideas that our staff bring forward. There will also be opportunities to visit Little Princess Trust HQ to help with daily tasks such as sorting the donations of hair. ETL will fund match money raised at the end of the year.



On 27th April 2025, Indra O'Brien (Executive Assistant) ran all 26.2 miles of the London Marathon. Pushing herself through the pain barrier and to the finish line in a fantastic time, she **raised over £1,200** for our focus charity, **Little Princess Trust**.



Our Corporate Compliance Manager, Rebecca Lyons, likes to paint water colours in her spare time.

In April 2025 she auctioned 8 framed prints, **raising £332** from generous donations made by her ETL colleagues.







# Governance

Upholding the highest standards of governance is essential to maintaining value for our shareholders, external board members and other stake holders.

This includes complying with all laws, rules, regulations, and policies applicable to our business.

**Page 37:** Corporate Governance

**Page 38:** Code of Business Ethics

**Page 39:** Slavery & Human Trafficking Statement

**Page 40:** Supplier Management

**Page 41:** Supplier Risk Register

**Page 42:** Supplier On-boarding & Monitoring Process

**Page 43:** Cyber Security and Data Protection

**Page 44:** Export Control & Compliance

**Page 45:** Anti Bribery & Corruption and Anti-Competitive Practices



## Corporate Governance

*ETL's Board of Directors is comprised of both Executive and Non-Executive members with a diverse range of experience.*

*The Board provide entrepreneurial leadership, along with strategic planning and monitoring of business operations and performance against highest standards of best practice. The Environmental, Social and Governance impact of the business is critical to decisions made at Board level.*

### Board of Directors

Kevin Dunne  
**CEO**

Ian Hilditch  
**Co Founder**

Esen Bayar  
**Co Founder**

Andrew Tyler  
**Non-Executive  
Chairman**

Jolyon Latimer  
**Non-Executive  
Director**

Paul Stephens  
**Finance  
Director**

Ben Lewis  
**Non-Executive  
Chairman**

### Senior Leadership

Paul Gouws  
**CTO**

Alex Baldock  
**COO**

Andrew Bond  
**Sales Director**

Joanna Gower  
**HR Director**

Simon Swift  
**Engineering Director  
Digital Technologies**

Sunil Murphy  
**Programme  
Manager**

Robb Ferrari  
**Operations  
Manager**

Mo Arbabi  
**Production  
Director**

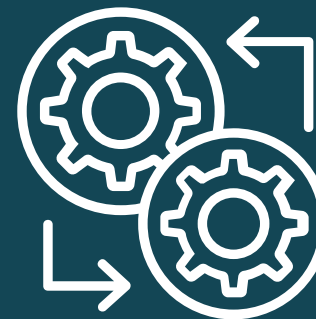
Susan Saadat  
**VP of Sales**

**Engineering**

**Operations**

**Sales**

**HR**



*In addition to monthly board meetings, the Senior Leadership team have monthly meetings to review and discuss company performance both commercially and in terms of working towards **ETL's Strategic Goals**.*

*The **Annual Strategic Plan** and **business roadmap** is reviewed at off site planning days, with ESG KPIs and ISO Quality and Environmental compliance being embedded into this process.*



# Business ethics and compliance

*ETL is committed to promoting the highest standards of openness, integrity, and accountability.*

*The Company encourages all employees to conduct themselves in accordance with high moral and ethical standards showing respect, integrity, honesty, fairness, and in full compliance with the law.*

*We have robust policies and training in place to ensure that conduct expectations are outlined, and we have rigorous processes in place to deal with misconduct.*

## New Policy

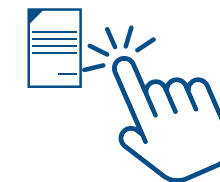


### Corporate Criminal Liability - Code of Business Ethics

In FY25 we launched a new Corporate Criminal Liability Code of Business Ethics along with an associated training module in the Learning Lounge.

All staff, including directors, employees, temporary personnel, contract personnel, consultants, intermediaries, agents and third parties acting on behalf of ETL are required to comply with ETL's Code of Ethics.

The full policy is available at <https://www.etlsystems.com/wp-content/uploads/2024/10/ETL-Corporate-Criminal-Liability-Code-of-Ethics-V1.0.pdf>



### Reporting concerns

It is essential that staff properly raise any concerns they have in relation to possible criminal activity and the reporting mechanism will depend on the nature of the suspected activity; with the processes outlined in the Anti-Bribery and Anti-Corruption Policy (covers anti-money laundering and fraud) and Anti-Competitive Practices Policy. For other concerns a whistleblowing report may be appropriate in accordance with ETL's Whistle Blowing Policy.

### Mandatory Compliance Training Courses launched in Learning Lounge in FY25:

Cyber Security and Phishing  
Display Screen Equipment (DSE)  
Equity, Diversity and Inclusion  
Site Security  
GDPR essentials  
Manual Handling  
Modern Slavery  
Preventing Bribery in Businesses  
Sexual harassment

#### Relevant staff:

Anti-Competitive Practices  
Corporate Criminal Liability - Code of Ethics  
Unconscious Bias for Managers

## 1643



Learning Lounge mandatory compliance training modules completed in Learning Lounge (FY25)

# Slavery & Human Trafficking Statement

In FY25 we also published a new Slavery and Human Trafficking Statement along with an associated training module on Modern Slavery in the Learning Lounge.

The Policy addresses the following:

- Structure, business and supply chains
- Policies in relation to slavery and human trafficking
- Due diligence processes in relation to slavery and human trafficking in our business and supply chains
- Risk assessment and management
- KPIs
- Training

The full statement is available at <https://www.etlsystems.com/wp-content/uploads/2025/03/ETL-Slavery-and-Human-Trafficking-Statement-V1.0.pdf>



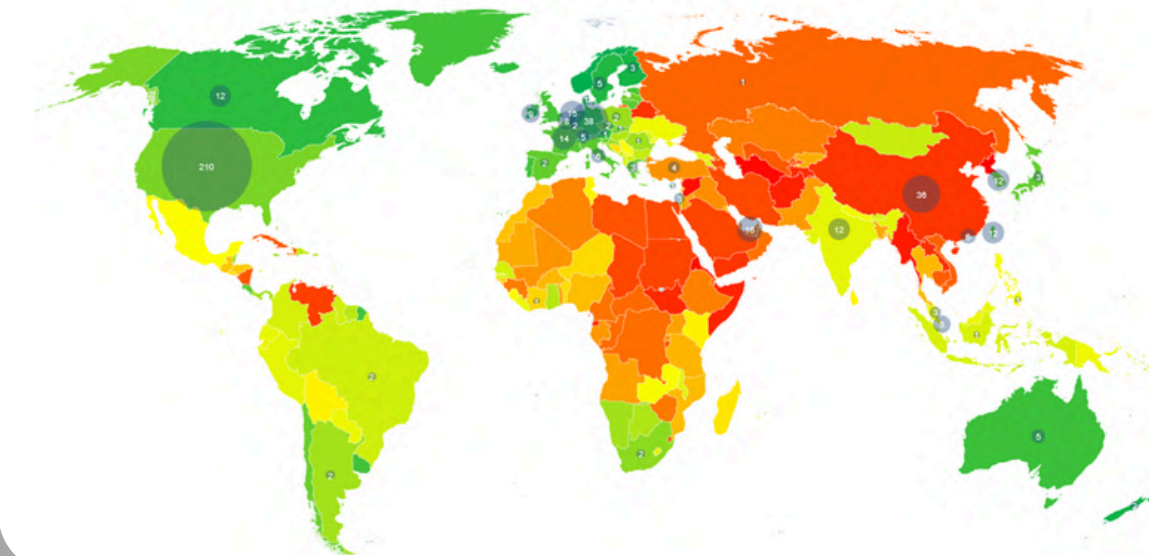
## Due diligence processes in relation to slavery and human trafficking in our business and supply chains

We understand that our biggest exposure to Modern Slavery is in our product supply chains. ETL's **Supplier Management** and **Export Control Policy** mitigate risk of exposure to incidents of slavery and human trafficking through engagement with third parties.

Advice supplied by World Governance Indicators is reviewed in relation to supplier locations. The modern slavery risk can be assessed by analysing a country's governance indicators, which include dimensions like **Rule of Law**, **Control of Corruption**, **Political Stability**, and **Voice & Accountability**. These factors can indirectly reflect the likelihood of modern slavery or human trafficking being present in a country.

ETL's suppliers in 2024 are mapped against the WGI maps shown on this page.

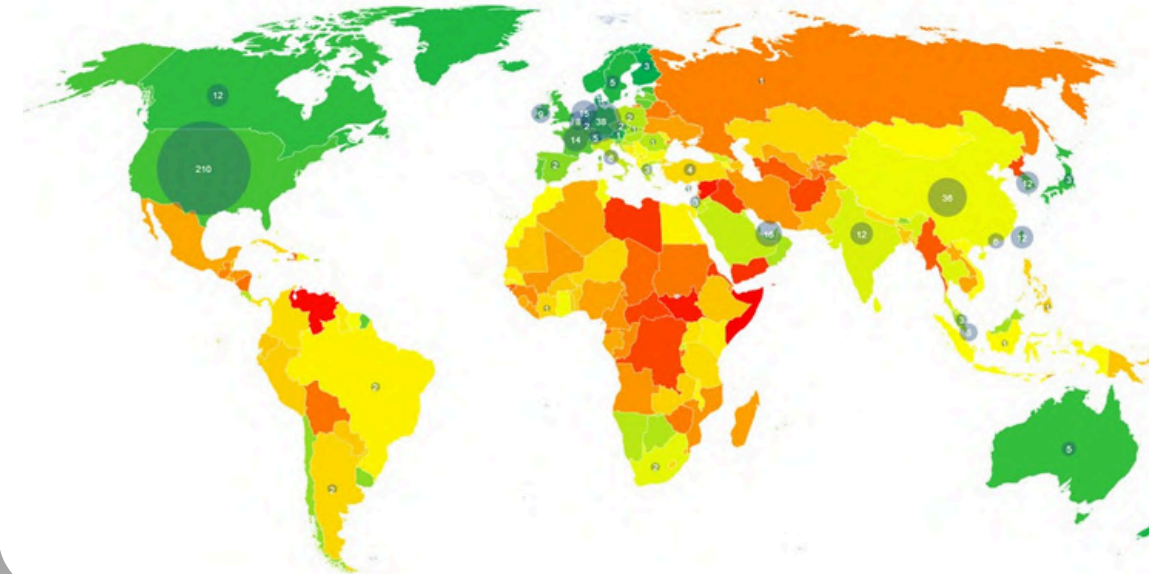
### ETL overseas suppliers mapped against WGI Voice and Accountability Rating 2022



*"Voice and accountability captures perceptions of the extent to which a country's citizens are able to participate in selecting their government, as well as freedom of expression, freedom of association, and a free media."*

<https://www.worldbank.org/content/dam/sites/govindicators/doc/va.pdf>

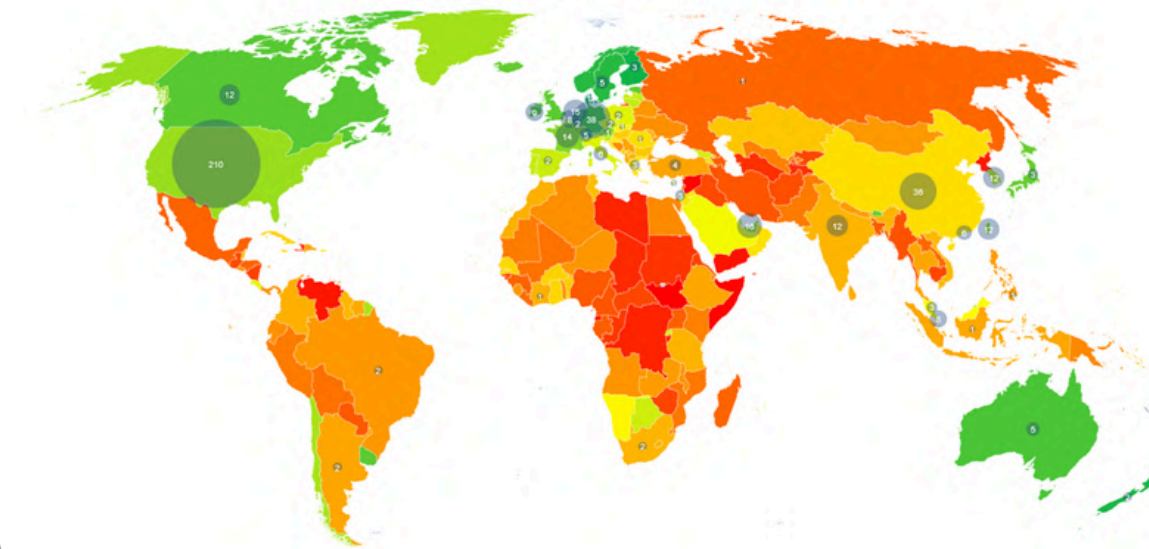
### ETL overseas suppliers mapped against WGI Rule of Law rating 2022



*Rule of law captures perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence."*

<https://www.worldbank.org/content/dam/sites/govindicators/doc/rl.pdf>

### ETL overseas Suppliers mapped against WGI Control of Corruption rating 2022



*"Control of corruption captures perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as "capture" of the state by elites and private interests."*

<https://www.worldbank.org/content/dam/sites/govindicators/doc/cc.pdf>



# Supplier Management

Engaging with and understanding our suppliers is key to sustainable business growth. In January 2024 we launched our new **Supplier Code of Conduct** and **Sustainable Procurement Policy** to support this.

In FY25 our Procurement Manager and Senior Quality Engineer developed a new **Supplier On-Boarding process**, to help assess suppliers against the sustainability credentials set out in the Supplier Code of Conduct and Procurement Policy.

Central to this process is our new **Supplier Risk Register** and our Procurement Manager has assessed each supplier against this. As a result, our **Supplier Monitoring Process** has been strengthened in FY25. Key monitoring methods are outlined on the right.



## Supplier Monitoring Methods

- Quality monitoring and a **Supplier Scorecard Assessment** (by Purchasing Team) every 6 months (top 50 suppliers based on spend) to analyse the supplier's performance. The report uses data in SAP in addition to a qualitative assessment. This involves scoring the supplier on RFQ response, technical innovation, support and communication, pricing, lead times and quality.
- **Monthly Supplier Risk Register Reviews** (2025 introduction) to ensure Suppliers are monitored regularly and by a broader team across the key areas.
- Data analysis on the response to the Supplier Code of Conduct -including receipt of signed Supplier Commitment Forms, and the Carbon Footprint Surveys.
- Visiting key suppliers to assess quality, performance, and ability to provide a timely service.
- Identifying key suppliers based on spend and highest contributors to scope 3 CO2e emissions.
- Supplier Carbon Footprint Survey to feed into our annual Carbon Footprint Report.



# Supplier Risk Register

New Suppliers are added to a Supplier Risk Register, which scores suppliers across the following areas:

- Financial
- Criticality
- Capacity
- Product Base
- Quality
- Lead Time
- Flexibility
- Location
- Reputation
- D&B
- ESG

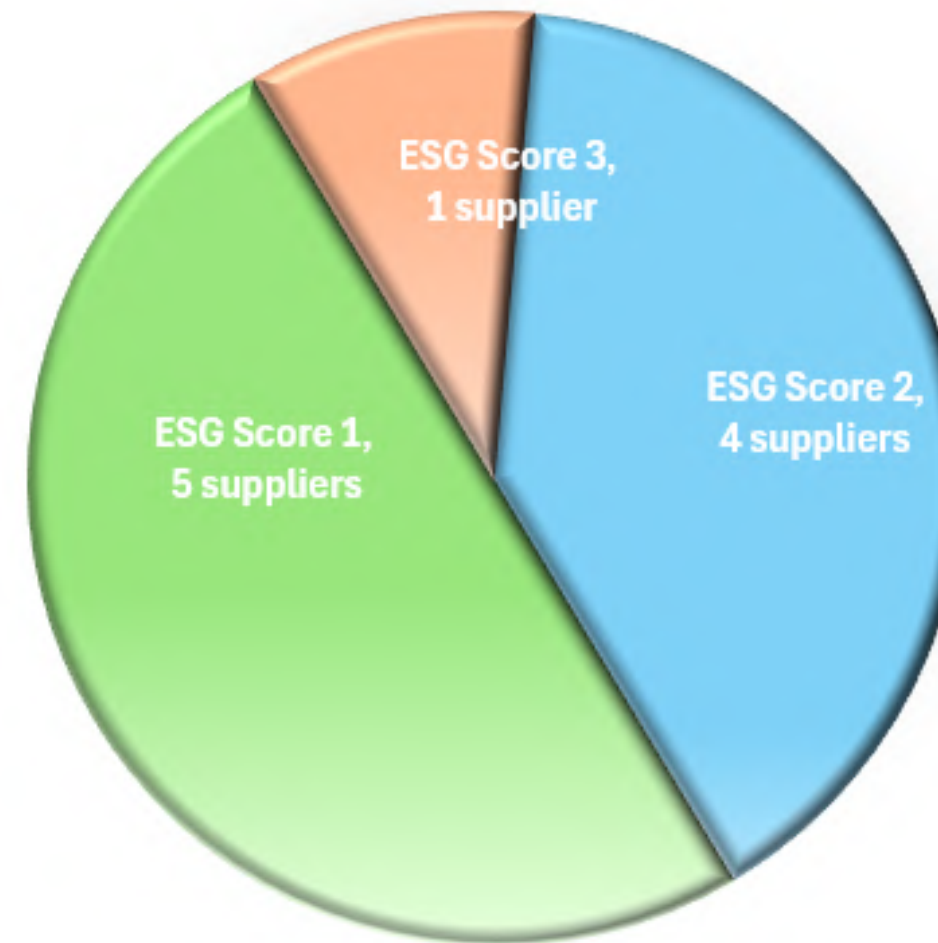
## Supplier ESG score

Our Procurement and Quality Team have graded each supplier with an ESG score that is factored into the overall Risk Rating.

The ESG Score accounts for whether the supplier has disclosed governance procedures, signed up to ETL's Supplier Code of Conduct and/or whether the supplier is in a country that is at elevated risk in terms of governance. Advice supplied by World Governance Indicators is reviewed in relation to supplier locations. .

The following chart shows that in our top 10 suppliers, there is one supplier with an ESG score of 3. This Supplier would be closely monitored to manage any associated risk.

## ESG score of top 10 product suppliers by spend



**ESG Score 1** ■  
Governance procedures shared and compliant to ETL's code of conduct

**ESG Score 2** ■  
Governance procedures not disclosed but is in a low-risk location

**ESG Score 3** ■  
Governance procedures not disclosed. Is in a country with elevated risk

## Working with suppliers

We work with suppliers to reuse, recycle and reduce energy consumption.

We review the sustainability credentials of our top suppliers and have a range of initiatives in place including:

- Reuse of packaging
- Consolidated collections
- Sourcing locally where possible

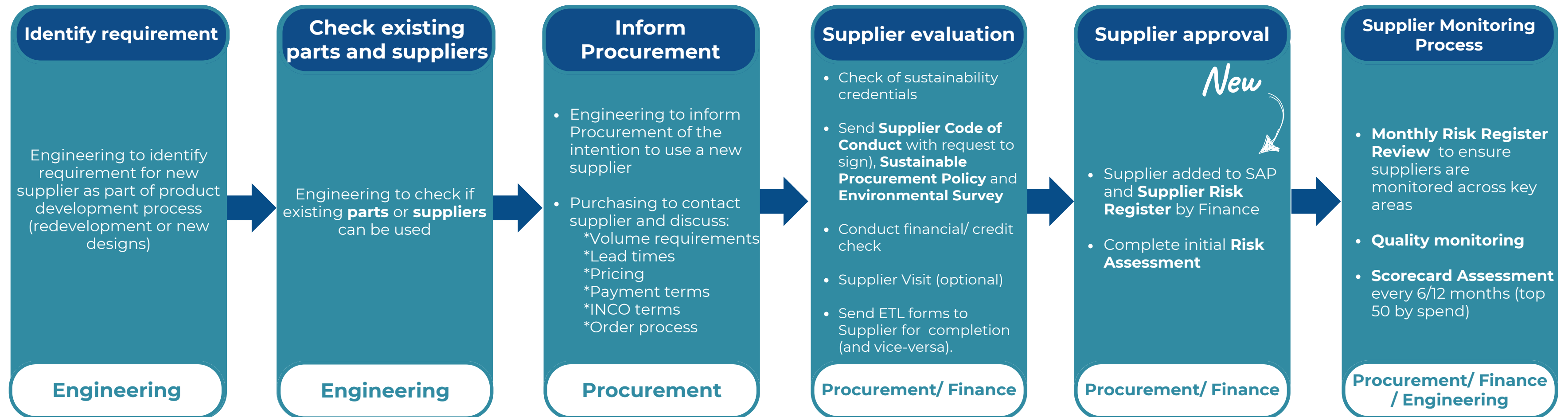
## Mitigating risk

Where risk is identified action is taken to mitigate risk. This may involve a site visit and in certain cases using an alternative supplier.

# Supplier On-boarding and Monitoring Process

## FY25 developments

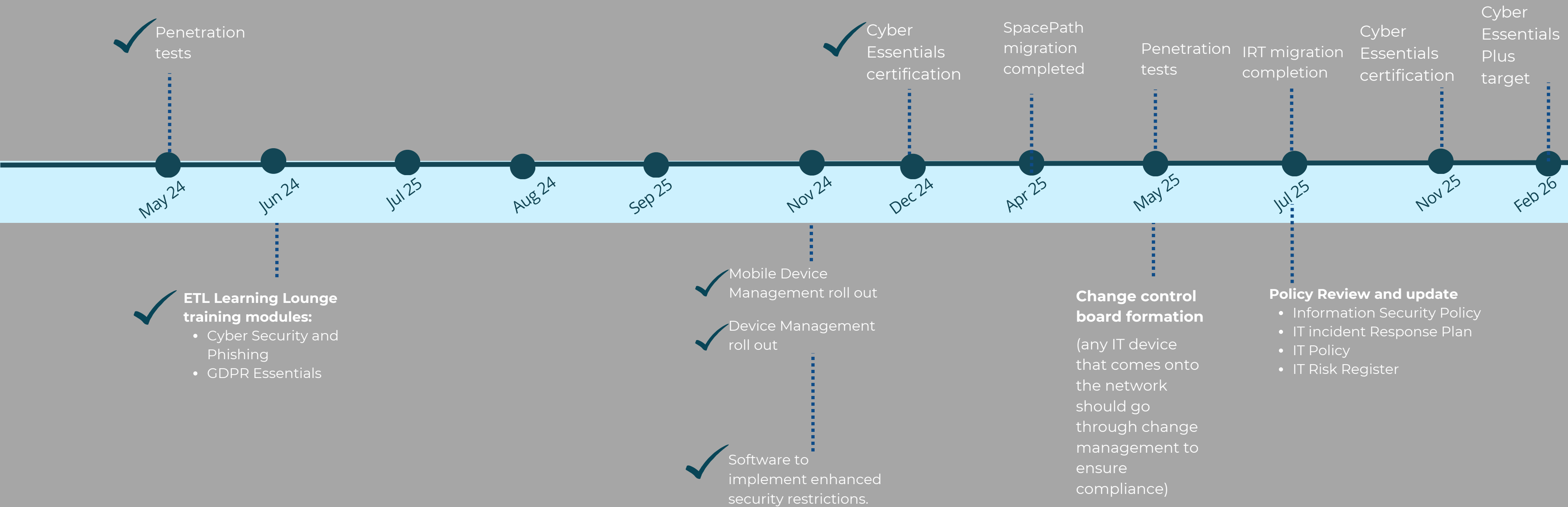
The development of our Supplier On-boarding and Management Process in FY25 has cemented the work we have been doing over the past few years in engaging with suppliers on key ESG topics such as carbon footprint, sustainable procurement and good governance.





# Cyber Security and Data Protection

ETL complies with all applicable data privacy laws and regulations including GDPR. Cyber Security accreditation is in place with UK Cyber Essentials. We have a strong cybersecurity strategy in place to monitor cyber protection including regular network and device scanning and reporting.

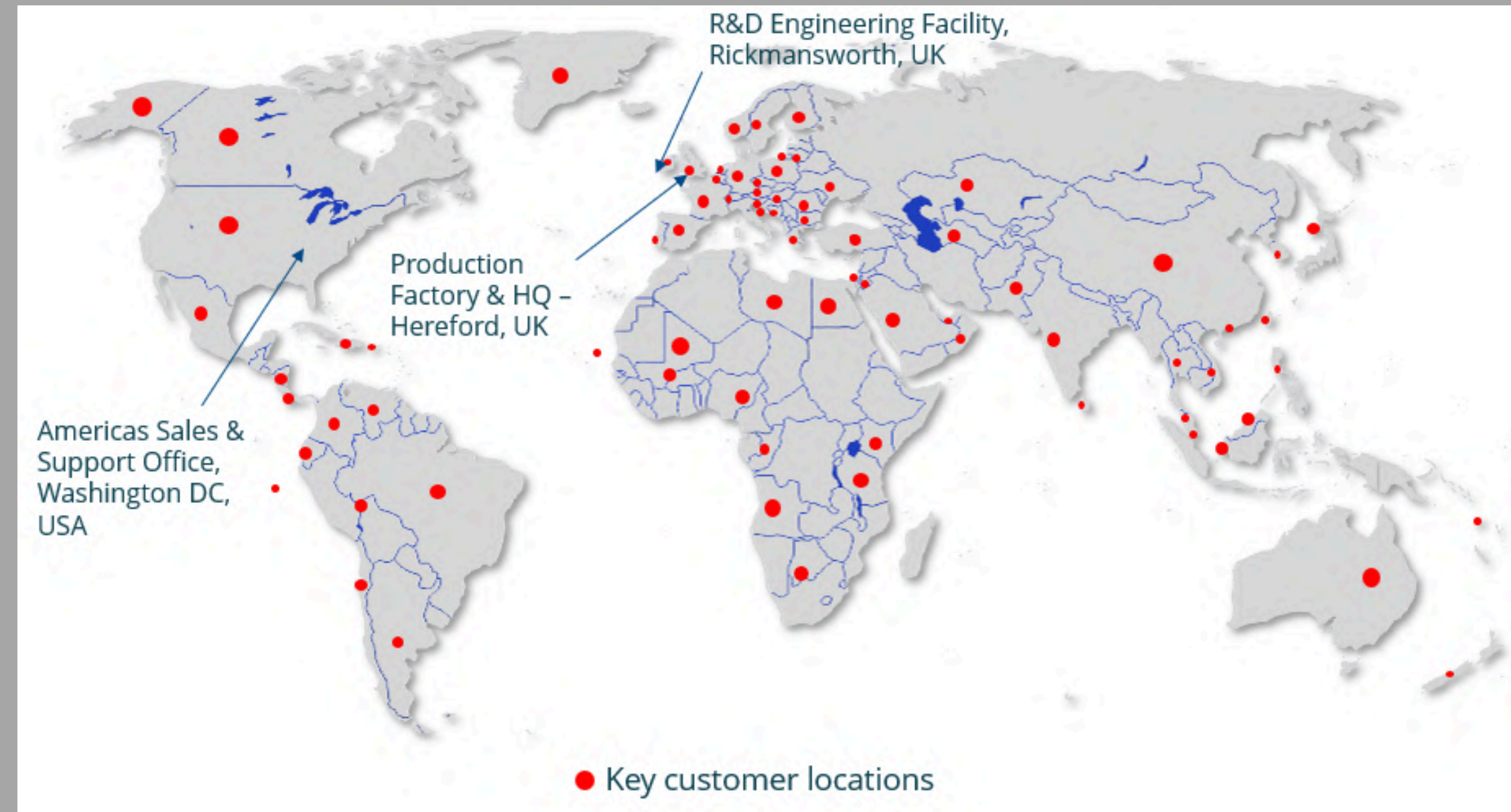




## Export Control & Compliance

ETL's **Export Control Compliance Policies** ensure compliance to UK and US export legislation and export controls. The Company carries out an annual review of ETL products and technologies against the Export Control Lists. Training is delivered to relevant teams.

ETL exports over 80% of its products to satellite customers in more than 110 countries around the world. Compliance to export control legislation is critical to how we operate.



**Exports are controlled for a number of reasons including:**

- concerns about internal repression, regional instability or other human rights violations
- concerns about the development of weapons of mass destruction
- foreign policy and international treaty commitments including as a result of the imposition of EU or United Nations trade sanctions or arms embargoes
- national and collective security of the UK and its allies





## Anti-Competitive Practices

ETL does not tolerate any anti-competitive behaviour, or behaviour which could lead to anti-competitive activity, or any legal, ethical, or moral breach of competition law. All staff and third parties acting on behalf of ETL are required to comply with ETL's **Anti-Competitive Practices Policy**. This outlines obligations and conduct required when dealing with competitors, customers and relating to a dominant market share.

### Policy

The policy highlights ETL's dedication to meeting all legal obligations and defines the conduct expectations for all employees and representatives of ETL.

### Training

The training to accompany ETL's policy on anti-competitive practices was released in February 2025 in the ETL Learning Lounge as mandatory compliance training for relevant staff.

### Full Policy:

<https://www.etlsystems.com/wp-content/uploads/2025/03/ETL-Anti-Competitive-Practices-Policy-V3.0.pdf>



## Anti-Bribery & Corruption

It is the policy of ETL to conduct all of its business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption in whatever form it may be encountered.

ETL's **Anti-Bribery & Corruption Policy** applies to anyone associated with ETL; including all employees, volunteers, interns, consultants, contractors, agents, business or joint venture partners and sponsors.

### Annual audit

An annual Risk Assessment of Anti-Bribery & Corruption across the company is carried out and is used as the basis for the ABC audit.

Medium and high risk items highlighted in the Risk Assessment are audited alongside the policy. Actions to address any areas for improvement or non conformities are identified.



### Training

In FY25 the training for Anti-Bribery and Corruption was refreshed with the new "Preventing Bribery in Business" module in the ETL Learning Lounge. This is mandatory compliance training for all staff.

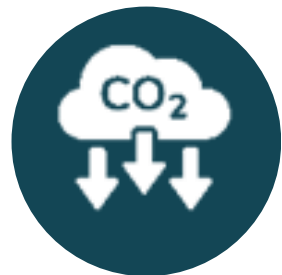
### Full Policy:

<https://www.etlsystems.com/wp-content/uploads/2024/10/ETL-Anti-Bribery-and-Anti-Corruption-Policy-V5.0.pdf>



# Key ESG highlights FY25

## Carbon emissions intensity reduction



- **Scope 1:** 4% intensity reduction, **Scope 2:** 17% intensity reduction, **Scope 3:** 4% intensity increase (FY24 vs FY23, location based)
- Up to c.40% self sufficiency from solar energy generated on-site for head office operational buildings
- **Energy Champions and energy saving from Visible Energy Monitoring System** through making changes to settings on major equipment (up to 54% savings recorded in FY24 with savings continuing into FY25)
- **Major recycling initiative** - soft plastic and foam in Production diverted from general waste for separate collection by local contractor for recycling. Investment in plastic compactor to enable effective on-site storage and reduce frequency of collections



## Quality & Environmental Management

- ISO 9001 and ISO 14001 surveillance audit with zero non-conformities
- Process improvements as a result of actions from internal audits of key operations across the business



## Circular economy Policy

- New **Circular Economy Policy** to embed sustainable practice and build on Sustainable Procurement Policy as well as SIOP process implementation - improving end to end processes; saving resources, energy and reducing carbon intensity of operations



## Supplier engagement

- Supplier Risk Register with ESG score (accounting for responses to Supplier Code of Conduct issued in FY24)
- New Supplier On-Boarding and Performance Monitoring process with monthly Risk Register Reviews planned with a broader team
- Continued engagement with Suppliers and third parties on ESG aspects, building a foundation for on-going collaboration



## New Compliance Policies and Training

- New Corporate Criminality - Code of Business Ethics launched and associated training
- New Slavery and Human Trafficking Statement launched and associated training
- 12 Compliance Training Courses launched including EDI, Modern Day Slavery, Anti-Competition, Preventing Bribery in Business, Code of Business Ethics



## Cyber security and data protection

- Penetration tests - May 2024
- Cyber Security and Phishing, and GDPR Essentials e-training launched
- Device and mobile device management roll out - November 2024
- Cyber Essentials certification - December 2024
- Change control board formation - April 2025



## Product design

- GENUS product design to minimise energy consumption through modular, easily upgradable solution, where chassis life is prolonged; supporting ETL's Circular Economy Policy



## Health & Safety

- Near Miss and Accident Reporting Process rolled out across all sites
- Risk Assessment refresh and review of actions



## Training and development

- ETL Learning Lounge launching in June 2024 - 2001 LL training modules completed. Plus 32 Udemy courses completed.
- Management development programme - Leading with a Purpose
- Early careers initiatives including 4 placements, 5 internships and collaboration with NMITE (New Engineering University in Hereford)
- 47 promotions and internal job moves



## Employee benefits

- Increased holiday allowance rolled out to all employees
- Employee Health Cash Plan
- Electric Car Scheme
- Employee Forum and implementation of ideas and feedback
- GPTW survey and accreditation



## Transport

- Electric car scheme
- Development of Green Travel Scheme on the back of the success in FY24



## **References:**

*This Corporate Responsibility Report has been prepared by ETL Systems Ltd.  
Extracts are included from following reports issued by Carbon Lens Ltd:*

- *Carbon Footprint Report for ETL Systems 2024-V5.0*
- *Carbon Footprint Report for ETL Systems 2023 Version 14*
- *Carbon Footprint Report for ETL Systems FY22 Rebaseline Feb 24 V2*