Environmental, Social & Governance (ESG) Policy

Our Commitment to Responsible Business

Version	1.0		
Effective Date	June 2026	**Next Review**	June 2027
Owner	COO	**Approved By**	Board of Directors

1. Purpose and Commitment

1.1. QED Ltd is committed to operating as a responsible business that creates long-term value for its employees, clients, communities, and the environment. This ESG Policy sets out our commitments, governance approach, and initial targets across three pillars: Environmental, Social, and Governance.

1.2. As a growing technology company, we acknowledge that our direct environmental footprint is relatively small, but our influence through the products we build, the clients we serve, and the talent we develop is significant. We will use that influence positively.

2. Environmental

2.1. Our Commitments

2.1.1. Reduce energy consumption by implementing energy-efficient equipment, remote-first working practices, and renewable energy sourcing where available.

2.1.2. Minimise business travel; prefer video conferencing for internal meetings where practical.

2.1.3. Select cloud providers (AWS, Google Cloud) with strong environmental credentials and net-zero commitments.

2.1.4. Design software with efficiency in mind, minimising unnecessary compute, data transfer, and storage.

3. Social

3.1. Our People

3.1.1. **Fair Pay:** We are committed to paying fair and competitive salaries.

3.1.2. **Wellbeing:** We provide flexible and remote-working arrangements, mental health support resources, and an environment where people feel safe to raise concerns.

3.1.3. **Diversity & Inclusion:** We recruit on the basis of merit, skill, and potential. We are committed to building a diverse team across gender, nationality, ethnicity, disability, and background. We use blind-screening practices in recruitment where possible.

3.1.4. **Learning & Development:** We commit a minimum annual L&D budget per employee and support professional certifications, and internal knowledge-sharing.

3.1.5. **Psychological Safety:** We maintain a no-blame culture, encourage open feedback, and run regular confidential Wellbeing Checks.

3.2. Community and Social Impact

3.2.1. **Education:** We support early-career talent through internships, mentorship, and university partnerships in the UK and Croatia.

3.2.2. **Ethical Client Selection:** We will not knowingly work with clients whose activities are harmful to society or the environment.

3.3. Supply Chain

3.3.1. We expect our suppliers and partners to share our values on human rights, fair labour, and environmental responsibility.

3.3.2. We prefer suppliers with demonstrable ESG credentials and will include ESG requirements in significant procurement decisions.

4. Governance

4.1. Ethical Business Conduct

4.1.1. **Anti-Bribery & Corruption:** QED maintains a zero-tolerance approach to bribery and corruption in all forms, in compliance with the *UK Bribery Act 2010* and applicable local laws. We do not offer, give, request, or accept bribes or improper inducements.

4.1.2. **Conflicts of Interest:** All employees and directors must declare actual or potential conflicts of interest.

4.1.3. **Whistleblowing:** QED provides a safe and confidential channel for employees and contractors to report concerns about misconduct, illegal activity, or policy breaches without fear of retaliation (protected disclosure under the *Public Interest Disclosure Act 1998*).

4.2. Data Ethics and AI

4.2.1. We are committed to developing and deploying AI responsibly: transparently, without bias, with meaningful human oversight, and in compliance with applicable AI regulation, including *Regulation (EU) 2024/1689 (EU AI Act)* to the extent applicable to QED's role as provider or deployer.

4.2.2. We maintain an internal AI Register documenting all AI systems we develop for clients and all AI tools used in our operations, including their risk classification under the *EU AI Act*.

4.2.3. We will not build or deploy AI systems that engage in any practice prohibited under *Article 5 of the EU AI Act*, discriminate unlawfully, manipulate users, or operate without appropriate human oversight.

4.2.4. We assess AI systems we develop against the risk classification framework of the EU AI Act. Where a system is or may be a High-Risk AI System under Annex III, we implement the required technical and governance measures - including risk management, data governance, and human oversight - before that system is placed on the market.

4.3. Tax and Financial Transparency

4.3.1. QED pays tax where economic value is created. We do not engage in aggressive tax avoidance structures.

4.3.2. Financial statements are prepared in accordance with *UK GAAP* and filed with *Companies House* in a timely manner (UK entity) and according to regulations in Croatia and Serbia for the entities in those countries.

4.4. ESG Governance

4.4.1. ESG is owned at board level, with the COO as operational lead.

4.4.2. This policy is reviewed annually and updated in response to regulatory changes, stakeholder feedback, or material changes to QED's operations.

5. Reporting and Transparency

QED will discuss ESG annually at board level, including progress against any targets, material ESG risks identified, and priorities for the coming year. As the Company grows, we intend to align our reporting with recognised frameworks (e.g., GRI, B Corp, UN SDGs) as appropriate to our scale.

6. Policy Review

This policy is reviewed annually by the COO - and, where applicable, at Board level and updated in response to changes in law, regulatory guidance, or business operations. Material changes are communicated to all staff.