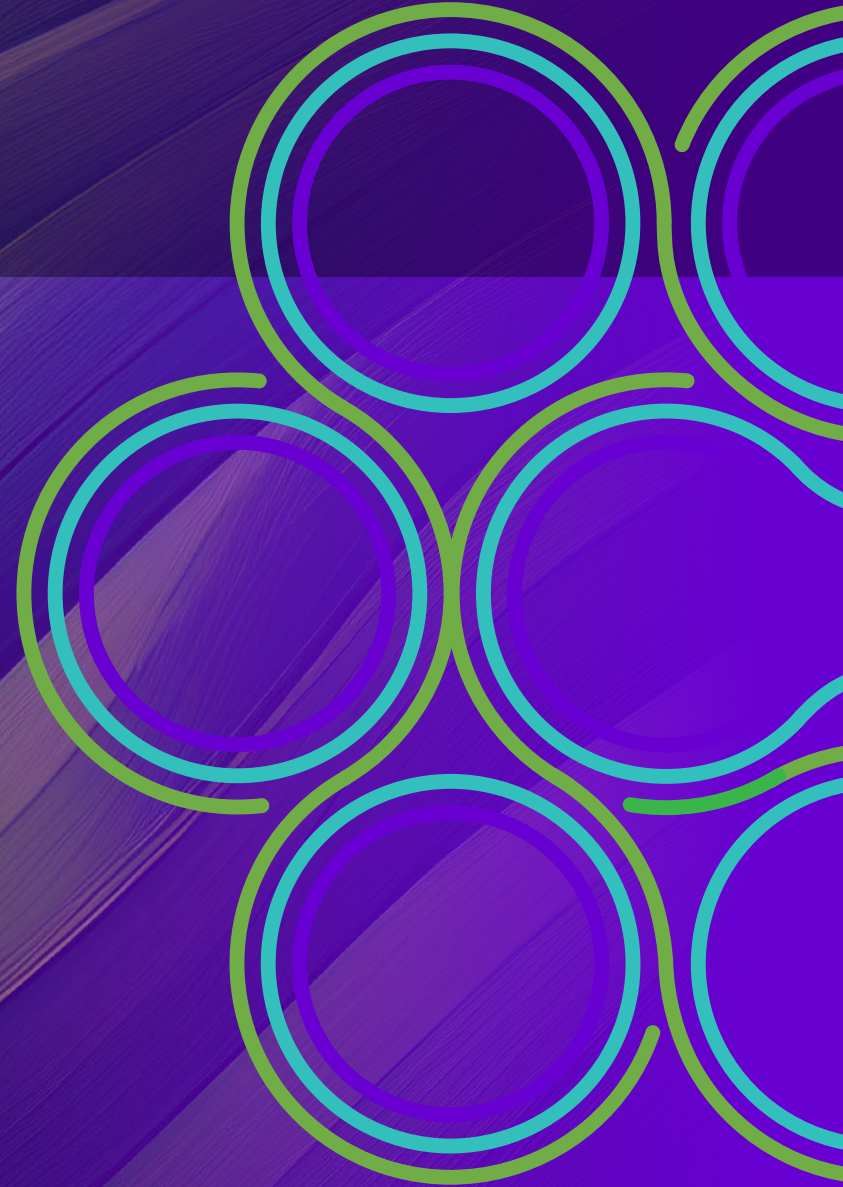


2022 Sustainability Report



Communications with a conscience.



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1. CEO Message

The Covid-19 pandemic demonstrated the power and influence that technology can play in the world and, during that time, Gamma worked hard to support our partners, customers and employees with a set of unified communication tools that enable people to work remotely and safely.



Just as the world was starting to recover from the global pandemic in 2022, we were met with a new set of challenges – increasingly unstable and unpredictable climate events, the move for greater equality and diversity, and political instability including the ongoing conflict in Ukraine.

Gamma celebrated its 20th anniversary in 2022, and with 20 years of solid growth behind us, I'm both proud and excited to have been appointed CEO of a committed group of talented and innovative individuals across the UK and Europe, all of whom are dedicated to supporting our partners and customers.

It has been in this context that we have outlined our approach towards environmental, social and governance (ESG) matters. Consultation with a wide set of internal and external stakeholders provided us with insight on issues that they consider to be material to Gamma, and upon which we have planned our ongoing programme of work.

We have made a commitment to achieve net-zero by 2042 for all three greenhouse gas (GHG) emissions scopes. We remain committed to contributing to the UN Sustainable Development Goals (UN SDGs) through our social and environmental programmes, and we are aligned to best practice from a disclosure perspective, supporting the Task Force for Climate-related Financial Disclosures (TCFD) and the Carbon Disclosure Project (CDP).

I believe that a clear, strategic approach to ESG is essential for companies to generate long-term value for our current and future stakeholders. We have made good progress over the past two years, and we continue to focus on areas where we want to achieve more. We are challenging ourselves to set and track targets for areas of importance to the company and to our stakeholders. I'm therefore delighted to be sharing the Gamma 2022 Sustainability Report, which sets out our priorities, commitments, and

brings our ESG stories to life. We are working hard to embed ESG into the culture of our business, from reducing our own emissions and increasing the diversity of our workforce, to enabling our customers and partners to reduce their own emissions by using collaboration tools.

Gamma is a B2B communications provider that empowers business for good. Our impact is built on the contribution from our employees; from the development and support of services and products, to the charities that we support, to the way that we govern and operate our business. I believe that we can increase our positive impact further and I look forward to seeing what we can achieve in 2023 and beyond.



2. Communications with a conscience

We are the only B2B communications provider that empowers business for good, for teams across Europe that want simple, intuitive experiences in an era of increasing complexity.

Gamma is a leading provider of Unified Communications as a Service (UCaaS) into the UK, German, Spanish and Dutch business markets, supplying communication solutions via our extensive network of trusted channel partners and also directly.

The combination of network investment, a digital-first approach and in-house development skills has enabled Gamma to develop a comprehensive portfolio of communications services with a significant amount of intellectual property, which has given us a heritage of disrupting the market with innovative and market-leading cloud-based services such as SIP Trunking and Hosted PBX in the UK.

At Gamma we pride ourselves on four distinct pillars when working with our customers and partners:

We offer flexible solutions: Our products, pricing and services can adjust to the changing needs of our partners and customers.

We have a collaborative culture: Offering specialist expertise of business communications, working in partnership with clients to achieve the right solution and provide ongoing support when it matters.

We deliver connected communications: Sophisticated, dependable and secure products and services designed to help businesses succeed.

We provide end-to-end control: End-to-end control and technical integration of network services for 'Always-on' unified communications that give people the freedom to work wherever, whenever.

Gamma is admitted to trading on the Alternative Investment Market (AIM) in the UK and has consistently enjoyed revenue and EBITDA growth since listing in 2014. The business operates in the UK, Germany, Spain and the Netherlands and looks to further expand its European presence.

2.1 Sustainability at Gamma

This Sustainability Report is designed to supplement our Annual Report, recognising the ever-growing need for transparency and reporting in all areas of environmental, social, and governance (ESG) issues.

Gamma believes that communications with a conscience is more than just a healthy balance sheet.

We aim to provide our employees with a great work-life balance, ensure that we protect the planet and limit any negative impact we have on it. We apply honesty, transparency and integrity in all our relationships. We want to empower businesses for good, for teams across Europe that want simple, intuitive experiences in an era of increasing complexity.

To that end, we are committed to meeting the rising expectations of our stakeholders in ESG matters and our ambition includes influencing our peers, customers, partners and employees towards sustainable ways of working.



We are proud to have received an 'AA' ESG rating from MSCI. MSCI is a provider of critical decision support tools and services for the global investment community and uses a 'AAA' to 'CCC' ratings scale to measure thousands of companies based on their exposure to industry-specific and financially material ESG risks.

The organisation's ability to manage those risks relative to peers is also considered when measuring and scoring so MSCI's ESG ratings reports help institutional investors identify companies' ESG risks and opportunities.

Embedding Sustainability

Gamma has put a robust governance structure in place for environmental and social responsibility. Driven by a Board Committee, the strategy and direction of our ESG programme to date has stemmed from the materiality exercise conducted in summer 2021. Alongside nominated Board members, several of our Executive Committee (ExCo) attend ESG Committee meetings, providing input to decisions and ensuring links back into the organisation. This has proven crucial to understanding the impact of ESG matters on our wider value chain in full, from our customers to suppliers.

Gamma appointed a Group Sustainability Director in January 2022, who is committed to raising awareness around the importance of sustainability and defining our longer-term approach. This role is supported by an Employee Experience Director, responsible for social value, an Environmental Data Manager, and a Head of Governance, responsible for managing our policies and supporting frameworks.

Through the ESG Committee, the Board ensures that environmental and social policies, and suitable governance structures, are established to align with Gamma's commitments. The Board also ensures that the Company:

- monitors and reviews current and emerging ESG trends, relevant international standards and legislative requirements.
- monitors and reviews climate-related risks and opportunities.
- identifies how ESG matters are likely to impact on the strategy, operations, and reputation of the Company.
- determines whether and how these are incorporated into or reflected in the Company's policies and objectives.

The governance framework – ESG Committee, ESG Steering Group, and the ESG Working Group – touches all levels and geographies of the Company.

This, together with ongoing communications via newsletters, video blogs and surveys, is helping to increase the levels of awareness and engagement across the Group.

We are also making progress with ESG news and information on our website, informing and updating the wider stakeholder community of our ESG plans, initiatives and progress.

Our ExCo members have individual ESG objectives embedded into their annual remuneration packages, covering all three aspects of ESG.

We also recognise that there is ongoing work to be done with regards gathering data, and we operate with a view to continual improvement. Where we currently don't have a full suite of data, we are looking to collate and report in future.

The disclosure landscape is ever-changing, and we monitor progress in this area in particular to ensure that our reporting process adapts and evolves to new and/or reworked requirements.

Our Policies

All Gamma policies are supported by a clear policy framework. The framework exists to ensure that Gamma policy is owned, defined, implemented and updated in an effective way. The policy framework also mandates that a policy owner defines controls around their policy and understands how to report on the effectiveness of the policy.

We have also launched a new training platform to support all employees with understanding their role and responsibilities around certain policies. Training is mandatory, with metrics and measure of compliance monitored and reported via the line manager. The relevant Board Committee reviews group policies every 12 months, with the Board approving all public policies before publication.

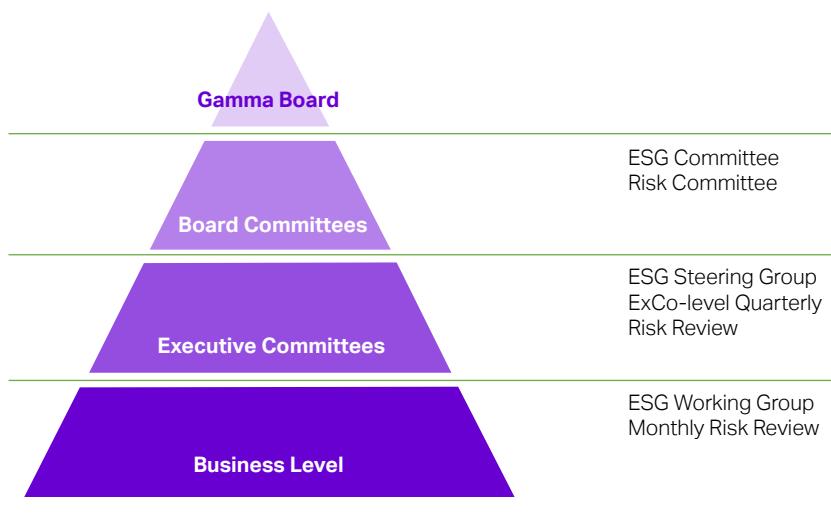
Well established policy controls highlight adherence issues. Gamma also operates a Whistleblowing process which can be used to detect and report on policy failures. The process is described in [section 4.7](#) of this report.

Our current public policies are listed below:

- Anti-Bribery and Corruption Policy
- Data Protection Policy
- Environmental Management Policy
- Equality, Diversity, and Inclusion Policy
- Ethical Conduct Policy
- Ethical Procurement Policy (UK-only)
- Group Whistleblowing Policy
- Information Security Policy
- Political Contributions Policy
- Political Lobbying Policy
- Risk Management Policy
- Share Dealing Policy

Also available are:

- Modern Slavery Statement
- Tax Strategy



Our Accreditations

Many of our customers, particularly in the public sector and industries where communications and information are mission critical, rightly demand that we have in place the appropriate certifications to recognised standards. These independently audited certifications demonstrate our commitment to driving for the highest quality of standards for our products, systems and underlying infrastructure.

Our accreditations are all listed on our [website](#), where you can find more information about what the accreditation is along with a copy of the relevant certificate.

2.2 Materiality at Gamma

In 2021 we worked with a specialist third-party consultancy to perform a wide-reaching materiality assessment, designed to help us identify sustainability priorities for our internal and external stakeholders.

The approach had the following aims:

- Using the Sustainability Accounting Standards Board (SASB) standard, complete a peer review for best practice and benchmarking.
- Identify key sustainability priorities across employees, customers, partners, our Board and our investors.
- Review legislative and disclosure requirements, now and future.

Results

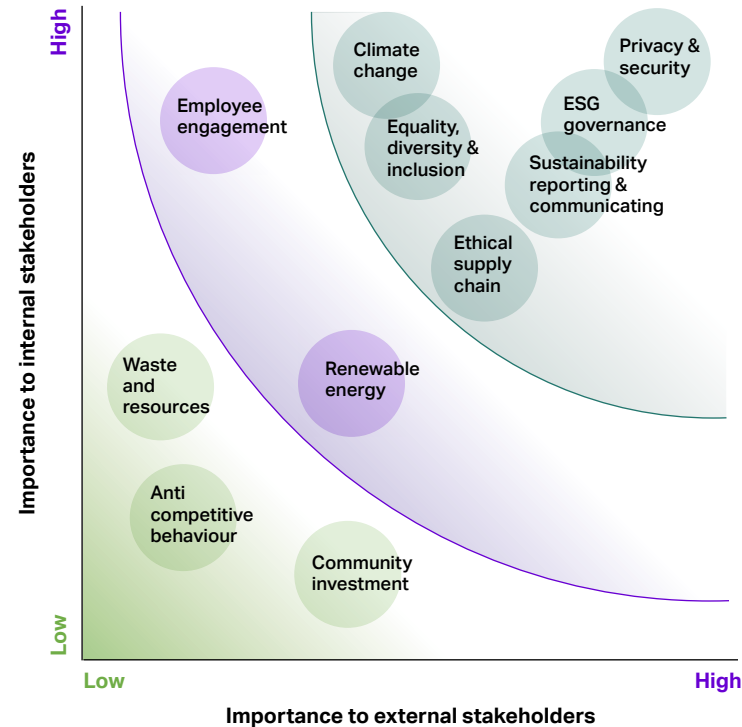
Our materiality matrix shows the issues identified as most material to our internal and external stakeholders and we have used these to shape our ESG programme of work.

All of these topics are covered in this report.

World Economic Forum International Business Council common metrics

Recognising that ESG disclosures are evolving all the time, for the purpose of this report, we have aligned to the World Economic Forum International Business Council (WEF IBC) common metrics in disclosing on the following summary topics - Governance, Planet, People, and Prosperity.

The WEF IBC common metrics have provided Gamma with a starting point for identifying key metrics and measuring them. These metrics are outlined in [section 3.1](#) of this report. We will indicate where data is not complete, and where we are on target but haven't yet achieved our targets. Our focus remains on building out a full suite of sustainability KPIs.



2.3 Gamma and the UN Sustainable Development Goals

The United Nations launched 17 Sustainable Development Goals (SDGs) in 2015, with the aim of ending poverty, fighting inequality and injustice, and tackling climate change.

We believe that the SDGs are a necessary call to action for businesses and organisations, not just governments. Gamma adopted the UN Sustainable Development Goals in January 2020, identifying four where we felt we could make the most meaningful contribution. These goals, along with input from our key stakeholders, have formed the foundation on which we have developed our environmental, social and ethical policies and will influence how we do business in future.

We work with a trusted leader in the Voluntary Carbon Market (VCM) to purchase carbon offset credits so that we can remain a CarbonNeutral® company. All projects that we support are aligned to our chosen UN SDGs.

Find out more about this in [section 5.6](#).

2.4 Our UN SDGs



Goal 5: Achieve Gender Equality and Empower all Women and Girls

Gamma is committed to achieving positive outcomes in relation to gender equality, either through formal policy or via our Social plan. We work closely with schools through Hi-Tech Horizons and Speakers for Schools, with activities promoting women and girls into technology careers.



Goal 8: Decent Work and Economic Growth

We are committed to developing our people with skills for the future, including future digital technologies. Our apprenticeship programme encourages the younger generation into full and productive employment, while our graduate programme, launched early in 2022, guarantees a full-time role on successful completion of the two-year programme.



Goal 10: Reduced Inequalities

Ensuring our current and future employees' wellbeing is a cornerstone of our Gamma values. Feeling included and valued in the workplace, having a voice, and feeling empowered to make decisions, all drive our culture.

Our employee engagement survey invites all colleagues to provide feedback anonymously twice a year, the output of which is used to inform our wider social and rewards programme. During 2022 we joined the Employers Network for Equality and Inclusion which has helped us to identify our focus points to build a fully inclusive and equal culture.

We are a Disability Confident employer and a signatory of the Armed Forces Covenant. We continue to support two charities, Action Through Enterprise (ATE) and SpecialEffect, by holding the Gamma Ball Rally each year and raising funds with our Channel Partner base. Both of these charities are sustainable, innovative, small charities that work to improve the lives and opportunities offered to children and adults in the UK and Ghana.

You can read more about our relationship with ATE and SpecialEffect in [section 6.4](#).



Goal 13: Climate Action

We are striving to reduce our greenhouse gas emissions and to reduce any negative impact that we have on the environment. Our carbon net-zero commitment demonstrates a clear response to taking measurable climate action – a key issue for our stakeholders, our business and our employees.

We also complete the Carbon Disclosure Project (CDP) each year. In 2022, we were rated B, improving from a B- rating in 2021.

Read more about CDP in [section 5.8](#).



3. Highlights 2022

We retained an MSCI score of AA.

We launched a new policy framework, with three new public policies launched, supported by employee training packages.

Gamma announced our ambition to become carbon net-zero across all three greenhouse gas (GHG) scopes by 2042.

We partnered with the Employers Network for Equality and Inclusion (ENEI) and conducted our first diversity audit. The output has been used to inform our new 'You Belong' programme which was launched in early 2023.

We responded to the Science-Based Target initiative's (SBTi) urgent call for corporate climate action by committing to align with 1.5°C and net-zero through the Business Ambition for 1.5°C campaign. We will seek SBTi validation of our short- and long-term targets in 2023.





Gamma has a new group of employee communities supporting diversity across our business – Wellness, Women, Early Careers, and Multicultural.

Our Carbon Disclosure Project (CDP) score improved from a B- in 2021, to B in 2022. We also achieved an A- rating in the Supplier Engagement Rating from CDP for 2022.





A new ESG Hub on our investor website was launched last year, outlining our work to date, our emissions information and reduction activities, as well as social value information.

3.1 Performance against targets and goals

Pillar	Theme	Metric	Progress to date	Status
Governance	Governing purpose	<p>Setting purpose</p> <p>The company's stated purpose, as the expression of the means by which a business proposes solutions to economic, environmental and social issues. Corporate purpose should create value for all stakeholders, including shareholders.</p>	<p>Outlined in our Annual Report and Accounts 2022.</p>	
	Quality of governing body	<p>Governance body composition</p> <p>Composition of the highest governance body and its committees by: competencies relating to economic, environmental and social topics; executive or non-executive; independence; tenure on the governance body; number of each individual's other significant positions and commitments, and the nature of the commitments; gender; membership of under-represented social groups; stakeholder representation.</p>	<p>Biographies of the Gamma Board members can be found here.</p> <p>The Board comprises two executive directors, the CEO and the CFO. Other members are independent, non-executive directors.</p> <p>As of March 2023, women represent 40% of the Gamma Board, men represent 60%.</p>	
	Stakeholder engagement	<p>Material issues impacting stakeholders</p> <p>A list of the topics that are material to key stakeholders and the company, how the topics were identified and how the stakeholders were engaged.</p>	<p>A materiality exercise was first conducted in 2021, with a full explanation of the engagement process and outcomes discussed in section 2.2 of this report.</p>	
	Ethical behaviour	<p>Anti-corruption</p> <p>1. Total percentage of governance body members, employees and business partners who have received training on the organisation's anti-corruption policies and procedures, broken down by region.</p> <p>2. a) Total number and nature of incidents of corruption confirmed during the current year, but related to previous years b) Total number and nature of incidents of corruption confirmed during the current year, related to this year.</p> <p>3. Discussion of initiatives and stakeholder engagement to improve the broader operating environment and culture, in order to combat corruption.</p>	<p>1. % not yet available. A new training package is being rolled out in 2023 to underpin the policy.</p> <p>2. a) 0</p> <p>2. b) 0</p> <p>3. Not yet available.</p>	

Pillar	Theme	Metric	Progress to date	Status
Governance	Ethical behaviour	<p>Protected ethics advice and reporting mechanisms</p> <p>A description of internal and external mechanisms for:</p> <ol style="list-style-type: none"> 1. Seeking advice about ethical and lawful behaviour and organisational integrity; and 2. Reporting concerns about unethical or unlawful behaviour and lack of organisational integrity. 	<p>Gamma has implemented a Whistleblowing policy and process, which is overseen by the Gamma Board.</p> <p>This is available here.</p>	
	Risk and Opportunity Oversight	<p>Integrating risk and opportunity into business process</p> <p>Company risk factor and opportunity disclosures that clearly identify the principal material risks and opportunities facing the company specifically (as opposed to generic sector risks), the company appetite in respect of these risks, how these risks and opportunities have moved over time and the response to those changes. These opportunities and risks should integrate material economic, environmental and social issues, including climate change and data stewardship.</p>	<p>Outlined in our Annual Report and Accounts 2022.</p> <p>A Risk Management Policy has been approved.</p> <p>Gamma has yet to integrate opportunities into business processes.</p>	
Planet	Climate Change	<p>Greenhouse gas (GHG) emissions</p> <p>For all relevant greenhouse gases (e.g. carbon dioxide, methane, nitrous oxide, F-gases etc.), report in metric tonnes of carbon dioxide equivalent (tCO2e) GHG Protocol Scope 1 and Scope 2 emissions. Estimate and report material upstream and downstream (GHG Protocol Scope 3) emissions where appropriate.</p>	<p>Summary in our Annual Report and Accounts 2022.</p> <p>An Environmental Management Policy is approved.</p> <p>Full details can be found in our Streamlined Energy and Carbon Review (SECR) 2022 Carbon Emissions Report, which includes full breakdown of all relevant greenhouse gases and GHG Protocol emissions.</p>	
	Climate Change	<p>TCFD implementation</p> <p>Fully implement the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).</p>	<p>Gamma is not yet required by the UK Government to implement the recommendations of TCFD. However, we are on track to complete this in 2024. A TCFD-aligned report for 2022 can be found here.</p>	

Pillar	Theme	Metric	Progress to date	Status									
Planet	Nature Loss	<p>Land use and ecological sensitivity</p> <p>Report the number and area (in hectares) of sites owned, leased or managed in or adjacent to protected areas and/or key biodiversity areas (KBA).</p>	3 sites within 1km of key biodiversity areas, totalling 2,336 m ² = 0.234 hectares.										
	Freshwater Availability	<p>Water consumption and withdrawal in water-stressed areas</p> <p>Report for operations where material: mega litres of water withdrawn, mega litres of water consumed and the percentage of each in regions with high or extremely high baseline water stress, according to WRI Aqueduct water risk atlas tool.</p>	<p>No direct withdrawal</p> <p>1.21 mega litres of water consumed</p> <p>6.56% of operation takes place in regions with high or extremely high baseline water stress = 0.10 mega litres</p>										
People	Dignity and Equality	<p>Diversity and inclusion (%)</p> <p>Percentage of employees per employee category, by gender and age.</p>	<table border="0"> <tr> <td>Gender</td> <td>Age</td> <td></td> </tr> <tr> <td>Disclosed in the Gamma Annual Report:</td> <td>Gamma UK only at present. Gamma is working towards increasing its data and measurements across all geographies.</td> <td> 18-24 - 8% 25-34 - 37% 35-44 - 29% 45-54 - 17% 55-64 - 8% 65+ - 1% </td> </tr> </table>	Gender	Age		Disclosed in the Gamma Annual Report:	Gamma UK only at present. Gamma is working towards increasing its data and measurements across all geographies.	18-24 - 8% 25-34 - 37% 35-44 - 29% 45-54 - 17% 55-64 - 8% 65+ - 1%				
	Gender	Age											
Disclosed in the Gamma Annual Report:	Gamma UK only at present. Gamma is working towards increasing its data and measurements across all geographies.	18-24 - 8% 25-34 - 37% 35-44 - 29% 45-54 - 17% 55-64 - 8% 65+ - 1%											
Dignity and Equality	<p>Pay equality (%)</p> <p>Ratio of the basic salary and remuneration by gender.</p>	<p>Information in our 2022 Annual Report and in the 2022 Gender Pay Gap report.</p> <table border="0"> <tr> <td>Gender Pay Gap</td> <td>Proportion of Males/ Females receiving bonus:</td> </tr> <tr> <td>Mean Pay Gap - 19.17%</td> <td>Male - 87.86%</td> </tr> <tr> <td>Median Pay Gap - 22.46%</td> <td>Female - 91.71%</td> </tr> <tr> <td>Mean Bonus Gap - 72.34%</td> <td></td> </tr> <tr> <td>Median Bonus Gap - 25.56%</td> <td></td> </tr> </table>	Gender Pay Gap	Proportion of Males/ Females receiving bonus:	Mean Pay Gap - 19.17%	Male - 87.86%	Median Pay Gap - 22.46%	Female - 91.71%	Mean Bonus Gap - 72.34%		Median Bonus Gap - 25.56%		
Gender Pay Gap	Proportion of Males/ Females receiving bonus:												
Mean Pay Gap - 19.17%	Male - 87.86%												
Median Pay Gap - 22.46%	Female - 91.71%												
Mean Bonus Gap - 72.34%													
Median Bonus Gap - 25.56%													

Pillar	Theme	Metric	Progress to date	Status
People	Dignity and Equality	<p>Wage level (%)</p> <p>1. Ratios of standard entry level wage by gender compared to local minimum wage.</p> <p>2. Ratio of the annual total compensation of the CEO to the median of the annual total compensation of all its employees, except the CEO.</p>	<p>1. UK National Living Wage 2022 = £18525 Gamma UK standard entry level wage (male and female) = £23000. Ratio: 1:1.24</p> <p>2. Outlined in full in our Annual Report and Accounts 2022.</p> <p>Gamma is working towards increasing its data and measurements across all geographies.</p>	
	Dignity and Equality	<p>Risk for incidents of child, forced or compulsory labour</p> <p>An explanation of the operations and suppliers considered to have significant risk for incidents of child labour, forced or compulsory labour. Such risks could emerge in relation to:</p> <p>a) type of operation (such as manufacturing plant) and type of supplier. b) countries or geographic areas with operations and suppliers considered at risk.</p>	<p>Top 60 suppliers have been evaluated and no significant risk has been identified.</p> <p>More about this can be found in section 4.5 of the report.</p> <p>Gamma has published a Modern Slavery Statement.</p>	
	Health and Wellbeing	<p>Health and safety (%)</p> <p>The number and rate of fatalities as a result of work-related injury; high-consequence work-related injuries (excluding fatalities); recordable work-related injuries; main types of work-related injury; and the number of hours worked. An explanation of how the organisation facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided for employees and workers.</p>	<p>0 fatalities 0 high consequence work-related injuries 15 recordable work-related injuries, relating to:</p> <ul style="list-style-type: none"> • minor employee injuries, such as cuts and bruises • employees becoming unwell at office • office incidents, no injury • near-miss hazard, no injury <p>All information on H&S can be found in section 4.1 of this report.</p>	
	Skills for the future	<p>Training provided (#, £)</p> <p>1. Average hours of training per person that the organisation's employees have undertaken during the reporting period, by gender and employee category (total number of hours of training provided to employees divided by the number of employees).</p> <p>2. Average training and development expenditure per full time employee (total cost of training provided to employees divided by the number of employees).</p>	<p>1. Gamma does not currently record the total number of training hours per person.</p> <p>A new L&D platform was launched in 2022 for all policy-related training in the UK. To date, over 2050 hours of virtual training has been completed in the UK, supporting our company policies.</p> <p>2. £520k across Gamma Group = £296 per employee, across seven countries.</p>	

Pillar

Prosperity

Theme

Employment & Wealth Generation

Metric

Absolute number and rate of employment

1. Total number and rate of new employee hires during the reporting period, by age group, gender, other indicators of diversity and region.
2. Total number and rate of employee turnover during the reporting period, by age group, gender, other indicators of diversity and region.

Progress to date

Gamma UK only at present. Gamma is working towards increasing its data and measurements across all geographies.

1. Total number and rate of new employee hires during the reporting period, by age group and gender.
2. Total number and rate of employee turnover during the reporting period, by age group and gender.

Age Group	New Hires	Total	Age Group	Leavers	Total
18-24	64	20%	18-24	29	9%
25-34	137	43%	25-34	134	44%
35-44	75	24%	35-44	74	24%
45-54	31	10%	45-54	41	13%
55-64	10	3%	55-64	27	9%
65+	2	1%	65+	3	1%
Grand Total	319	100%	Grand Total	308	100%

Gender	New Hires	Total	Gender	Leavers	Total
Female	102	32%	Female	111	36%
Male	217	68%	Male	197	64%
Grand Total	319	100%	Grand Total	319	100%

Status



Employment & Wealth Generation

Economic contribution

1. Direct economic value generated and distributed (EVG&D), on an accruals basis, covering the basic components for the organisation's global operations, ideally split out by:
 - Revenues
 - Operating costs
 - Employee wages and benefits
 - Payments to providers of capital
 - Payments to government
 - Community investment
2. Financial assistance received from the government: total monetary value of financial assistance received by the organisation from any government during the reporting period.

1. Contained in full in our [Annual Report and Accounts 2022](#).
2. No government assistance received.

Pillar	Theme	Metric	Progress to date	Status
Prosperity	Employment & Wealth Generation	<p>Financial investment contribution</p> <p>1. Total capital expenditures (CapEx) minus depreciation, supported by narrative to describe the company's investment strategy.</p> <p>2. Share buybacks plus dividend payments, supported by narrative to describe the company's strategy for returns of capital to shareholders.</p>	<p>1. Contained in full in our 2022 Annual Report.</p> <p>2. Gamma has not completed any share buy backs.</p>	✓
	Innovation of better products and services	<p>Total R&D expenses (£)</p> <p>Total costs related to research and development.</p>	<p>£29.1m (2021: £19.6m; +48%)</p> <p>Details included in 2022 Annual Report.</p>	✓
	Community and social vitality	<p>Total tax paid</p> <p>The total global tax borne by the company, including corporate income taxes, property taxes, non-creditable VAT and other sales taxes, employer-paid payroll taxes, and other taxes that constitute costs to the company, by category of taxes.</p>	<p>£26.7m</p>	✓

4. Governance

Gamma aims to conduct all business with honesty, integrity and respect for others. We are committed to upholding the highest standards of conduct across our business and we express this commitment through our culture, values, policies and procedures, and by adhering to laws and regulations in the countries in which we operate.

ESG Responsibility

Our Board delegates authority on ESG matters to the ESG Committee, which is chaired by a Non-Executive Director and attended by other members of our Board, including the CEO and CFO. The ESG Committee met each quarter in 2022.

The ESG Committee oversees our conduct as a responsible and sustainable business and we carefully monitor the development of international legislation and social standards, as well as ensuring that feedback from our internal and external stakeholders is pro-actively sought and considered.

The Committee is responsible, on behalf of the Board, for overseeing the development of the Group's ESG strategy and governance structure and the establishment of related goals and policies. The Committee works in conjunction with the Risk Committee to oversee the identification and mitigation of risks relating to ESG matters, and for the identification of related opportunities.

Our Conduct

Our commitment to upholding the highest standards of conduct across the business is supported by an Ethical Conduct policy and an Ethical Procurement policy. Honesty, respect for colleagues, customers, suppliers,

and stakeholders, and declaring conflicts of interest, are all elements of the expected high ethical standards.

The Board intends that Gamma be a positive contributor to society and, to that end, we have a number of public-facing policies, which are reviewed on an annual basis, approved by the Board, and rolled out across all Gamma employees. These policies are available on our website.

We also have robust mechanisms in place to ensure that any concerns can be raised confidentially. A global anonymous reporting service is in place, supported by a Whistleblowing policy and procedure, so that concerns about any aspect of our business operations, including modern slavery and any other form of unethical business conduct, can be reported without the fear of retaliation. The service is available via a third-party 24 hours a day, 7 days a week, by phone or online.

Our Stakeholders

We actively seek feedback from stakeholder groups that are potentially affected by our business. On ESG matters, we formally consult as part of our materiality assessment, and this feedback has helped us to prioritise and shape out our ESG agenda and strategy. On a more informal basis, we consult with our stakeholders in our day-to-day work, holding

all feedback from our Channel Partners, customers, investors, and employees in high regard.

4.1 Health & Safety, and Wellbeing

At Gamma, we consider health, safety and wellbeing with equal importance and promote safe working practices alongside a healthy work-life balance.

We promote equally the duties of management and employees, with the expectation that everyone has a duty to take care of their own health and safety, and that of others, to report any accidents, incidents, and concerns in relation to health, safety, wellbeing, and unsafe acts or conditions. The global pandemic has seen a shift to a hybrid approach of doing business, and much of our workforce is now working from home some or all of the time. We have worked to ensure that our employees have access to ergonomically sound workspaces at home, providing IT equipment and furniture where requested.

Gamma has field engineers who are provided with personal protective equipment where necessary, and they also use a dynamic risk assessment tool to allow them to complete site risk assessments on a site-by-site basis.

This improves their ability to identify and understand the risks they face and avoid taking any unnecessary risk.

A new provider for Health and Safety training was launched during 2022, enhancing the training offered to employees, including:

- Health and safety essentials
- Display screen equipment use (including risk assessments)
- Health and safety for managers
- Managing mental health for managers
- Stress awareness

Higher risk roles have also been provided specific training for their role, for example, ladder safety, electrical safety and manual handling.

We are also an accredited member of CHAS, the Contractors Health and Safety Assessment Scheme, which aims to help businesses work safer and more efficiently through a comprehensive review of H&S policy and procedures.

During 2022, Gamma reported 15 minor injury/illness-related events, none of which were high-consequence. There was one incident of an office-based, near-miss hazard.

Wellbeing

Over the past two years, we have increased focus on the mental wellbeing of our employees, partly as a response to the global Covid-19 pandemic, which emphasised the need to provide coping mechanisms and connections with others.



We aim to:

- Raise awareness of the importance of wellbeing and mental health at work.
- Provide information and support to our employees.
- Develop a group-wide wellbeing strategy.

Additional communications have been delivered through our intranet and internal collaboration sites have encouraged our employees to form online communities.

You can find out more about our Wellbeing programme and initiatives on [page 37](#).

Health and Wellbeing Services

There is a range of options offered to our employees for non-occupational medical and healthcare services.

Gamma offers all employees access to an Employee Assistance Programme (EAP) service which offers free confidential advice 24/7. The EAP offers advice on a range of topics, included mental and physical health, and the service can also arrange counselling online or face-to-face. There is also an app providing information on the go.

In 2022 we also introduced a new service available to Gamma UK employees which provides a remote GP and second medical opinion service 24/7, 365 days a year.

All Gamma employees can request an annual eyecare examination voucher, and there is a Health Care Cash Plan scheme for those wishing to purchase cover to claim cash back on routine medical or dental costs. We also offer our UK employees the winter flu vaccine every year.

4.2 Ethical Conduct

At Gamma we expect all our employees and suppliers to read, understand and adhere to our Group Ethical Conduct and our Ethical Procurement policy in the UK.

Our Group Ethical Conduct policy outlines the responsibilities and proper practices of our employees when working for Gamma, including requirements to comply with the law in each jurisdiction in which we operate, and maintaining high ethical standards.

The policy defines the principles and policies of business ethics that Gamma and its employees must conform to and is reviewed and approved by the Board. The policy includes Equality, Diversity, and Inclusion (EDI), staff wages, anti-bribery and corruption, modern slavery, competition law, share dealing, procurement, and confidentiality and information security. Many of these are supported by a separate, more detailed policy.

The UK Ethical Procurement policy is limited in scope to our UK businesses at present, and again this outlines our expectations and requirements with regards suppliers complying with UK law, and upholding and maintaining high ethical standards.

This applies to labour standards, environmental standards, data protection and information security, and ethical policies and controls.

Gamma suppliers are encouraged to report any potential or actual breaches of the UK Ethical Procurement policy directly to Gamma.

We always aim to work collaboratively with suppliers to improve ethical, social and environmental standards across the supply chain.

4.3 Risk & Opportunity Management

Risk management plays a critical role in Gamma as it enables us to maintain our agile business practices, push boundaries and continue to grow rapidly in a way which doesn't introduce unnecessary risk. We want to generate long-term, continuous growth and therefore we need to strike a balance between opportunities and risk.

Over the past 12 months, we have conducted a comprehensive review of how we manage risks across our business, engaging with senior managers from multiple functions, and informing our principal risks and their ownership. Via this revised framework, we have defined our risk appetite, the roles and responsibilities across the whole business, the repeatable risk management process and the controls that govern the process.

The risk management process includes ESG risks, which are incorporated into the company-wide risk register. The principal material risks are outlined in the Annual Report.

The Board has overall responsibility for the establishment and oversight of the Group's risk management framework, for ensuring that an appropriate risk management culture exists within the organisation, and for ensuring the effective identification, assessment and management of individual risks.

To assist in this process, with respect to non-financial risk, the Board has established a Risk Committee which meets several times a year and is responsible for ensuring that:

- Management has implemented an appropriate and effective risk assessment, management and internal control system.
- There is an effective system in place for the identification and assessment of new and emerging risks.
- The nature and extent of the principal risks faced is understood and that they are effectively managed and mitigated.
- An appropriate risk management culture exists within the organisation.

Our Risk Management policy is applicable across the Group and is available on our website.

Opportunities Management has yet to be embedded into this framework although it is our intention to do so in the future. From a climate change and environmental perspective, we do capture identified opportunities as part of our work to report along the guidelines laid out by the Taskforce on Climate-related Financial Disclosures (TCFD).

You can read more about these in the [TCFD report](#) on the ESG Hub.

4.4 Privacy and Security

Gamma is committed to protecting the privacy of personal data and maintaining the principles of integrity and trust.

During 2022 Gamma had no reportable personal data breaches.

Privacy

The Gamma Privacy policy provides information on how we collect and process personal data through our gamma.co.uk and gammacommunications.plc websites, our customer portals, and through interactions with our customers, Channel Partners, and suppliers. We also provide contact information for our Data Protection Officer (DPO) in the UK.

There is also a Cookie policy describing how and why we make use of cookies to help manage our websites.

We also have an Employee Privacy Procedure which informs employees of their privacy rights and provides information regarding who we share their information with and why.

Information Security and Data Protection

Our first layer of protection is our people. During 2022, we reviewed and published our Group Information Security policy and our Group Data Protection policy, supported by training packages that UK employees are obliged to complete. We are currently assessing appropriate training packages for our European teams.

Information Security

Gamma recognises the high risk posed by cyber threats to our products and services provided to customers, operations, assets, and employees. Protection of information we process on our customers' behalf is of paramount importance, and we work continuously to ensure that we have a robust, agile and resilient cyber security posture, able to adapt to evolving cyber risks and threats.

The Group Information Security policy outlines our aims and goals and the responsibilities across the business for ensuring operational security controls. We have a strict governance and reporting mechanism in place, with the Risk Committee, a Board Committee, receiving regular security briefings, considering cybersecurity risks and controls. The Board receives an annual security briefing.

Gamma Group aligns to, or is certified against, various security frameworks.

Data Protection

Data is an asset that allows technology companies such as Gamma to operate. Data may relate to market forecasts, customer

information, product usage statistics, technical designs and configurations, financial information, employee information or network availability metrics.

Gamma considers data protection to be a vital part of its internal controls and aims to implement relevant controls at the most appropriate level. The intention is to ensure data is available to those who need it, when they need it, to deliver against our objectives, while also ensuring those who do not need access are not able to use it inappropriately.

Our Group Data Protection policy outlines our commitments, including our pledge to remain transparent with our customers regarding how their data is stored and processed, subject to any applicable local legal/security restrictions. It also details the governance and reporting structure that supports our policy statements.

4.5 Modern Slavery

Gamma adheres to the UK Modern Slavery Act 2015, and we are committed to understanding all potential modern slavery risks relating to our business, as well as putting in place steps that are aimed at ensuring there is no slavery or human trafficking in our own business or in our supply chains.

We issue a Modern Slavery and Human Trafficking Statement every year which covers our UK operating entities, and we are committed to ensure that over time all of our operating entities work to the same high standards.

Across our business, we have processes in place to identify and address potential and actual human rights impacts.

Employees

Our employee policies and Ethical Code of Conduct make it clear to employees the actions and behaviour expected of them when representing Gamma. We only use specified, reputable employment agencies to source labour.

Gamma has a Whistleblowing policy, providing employees and others with a transparent, easy to use and confidential process for dealing with concerns, including those of modern slavery and human trafficking.

Suppliers

In relation to the products and services that we provide, Gamma conducts a regular risk assessment of the different types of supply so as to identify which area poses the greatest risk of modern slavery or human trafficking being involved.

The risk assessment completed in the last 12 months has deemed that, although the supply of materials and components by third parties to Gamma's suppliers or further upstream is considered higher risk, products and services purchased in connection with the general operations of our business are considered low risk.

We risk assessed the Top 60 suppliers in the UK, against criteria such as industry type, likely nature of the workforce, supplier location, commodity type, and the business/supplier chain model. Coupled with available supplier questionnaires, we have initially deemed the modern slavery and child labour

risk to be low. We are not aware of any modern slavery cases in our supply chain.

We also have an Ethical Procurement policy (covering our UK-based procurement) which outlines the principles that all of our suppliers are expected to meet as a minimum, including complying with local laws and regulations, and respecting internationally recognised human and labour rights, including the prevention of modern slavery.

In order to monitor compliance, we ask all suppliers to complete an Ethical Procurement policy supplier questionnaire, confirming that they comply with the Gamma Ethical Procurement policy within their own business.

We ask that suppliers probe and, where appropriate, audit supply chains where the risks are deemed higher. Key areas include child labour, modern slavery, anti-bribery, discrimination, and disciplinary practices. Suppliers may be required to provide evidence on request that high risk supply chains have been reviewed and audited where appropriate.

4.6 Anti-bribery & corruption

Gamma has a zero-tolerance approach towards corruption, bribery and fraud of all kinds, and we are committed to complying with all applicable anti-corruption laws.

Our full policy can be found on our website. The policy outlines the expectations that the company has on all persons who work with or on behalf of Gamma, and sets out our position with regard to anti-bribery and corruption

including the breach reporting procedure. During 2022, Gamma received no reports of corruption or bribery.

In 2023 we will be rolling out a new training package to all employees to support our policy. This will provide us with improved visibility of course completion. Employees working in functions that have been identified by Gamma as being at particular risk are subject to further training and guidance about expected standards of conduct.

4.7 Whistleblowing

Gamma has a whistleblowing service which enables employees to confidentially raise concerns internally at a high level and to disclose information which the individual believes shows malpractice or impropriety.

The service is provided by an independent organisation, available 24 hours a day, 7 days a week, 365 days a year, and across all of our UK and European entities.

Employees can report anything that goes against our code – including bribery, health and safety, human rights or modern slavery violations, bullying or harassment, or corruption. Once reported and reviewed by our independent Non-Executive Directors, the process is subsequently managed by a cross-functional team of senior leaders, all of whom have been trained in investigating such matters.

Gamma has a group-wide Whistleblowing policy which can be found [here](#).

4.8 Tax Strategy

Gamma's approach to tax planning and tax risk management is described in full in our annual Tax Strategy statement which is reviewed and approved by the Board annually. We ensure that we pay our fair share of taxes in the countries in which we operate, complying with relevant legislation, thus contributing to local economies and people's lives.

Our approach is based on three principles;

- **To act with integrity and transparency in our dealings with all relevant stakeholders, including the tax authorities in the countries we operate.**
- **To meet the tax compliance requirements required of us by filing returns and paying our tax liabilities on time.**
- **To reduce the cost of doing business by utilising appropriate reliefs where it is legal and feasible to do so.**

The CFO is responsible for the delivery of the tax strategy and for managing the tax risks that arise in the countries where Gamma operates.

Gamma's level of acceptable tax risk is considered at least annually by the CFO and Board. They will take the needs and interests of stakeholders into account when considering the level of risk while ensuring Gamma acts with integrity and transparency.

5. Environmental

Gamma recognises the increasing risk climate change poses to our planet and we understand that our company has a responsibility to our employees, stakeholders, shareholders and the wider community to act.

Environment

Back in 2006 we made a commitment to reduce the carbon footprint across our network through investment in the efficiency of our IP based network and other assets, as well as an active offset management programme. Our network was the first to go carbon neutral in its sector and we have remained fully CarbonNeutral® certified for the past 17 years.

Supported by our Board and the ESG Committee, we have continued to strengthen our commitment to reduce our impact on the environment, through developing our sustainability goals, investing resources into reducing our carbon footprint, and via improved and transparent disclosures. In all aspects of our business, our aim is always to do no harm to the environment and community in which we operate.

In 2022, we announced our commitment to move from a CarbonNeutral® business to become a carbon net-zero business by 2042, supporting both the Paris Treaty's aims to limit the temperature increase to 1.5°C globally and the UN Sustainable Development Goal 13: Climate Action.

As a communications provider, Gamma carries a low environmental impact. Our product set enables our employees and customers to make proactive decisions to reduce their own carbon footprint and environmental impact through technology which supports remote working and virtual video conferencing.

We have worked hard over the past 18 months to understand and refine our emissions calculations. Gamma's most significant operational environmental impact is energy consumption from its office premises, data centres, business travel and purchased goods and services.

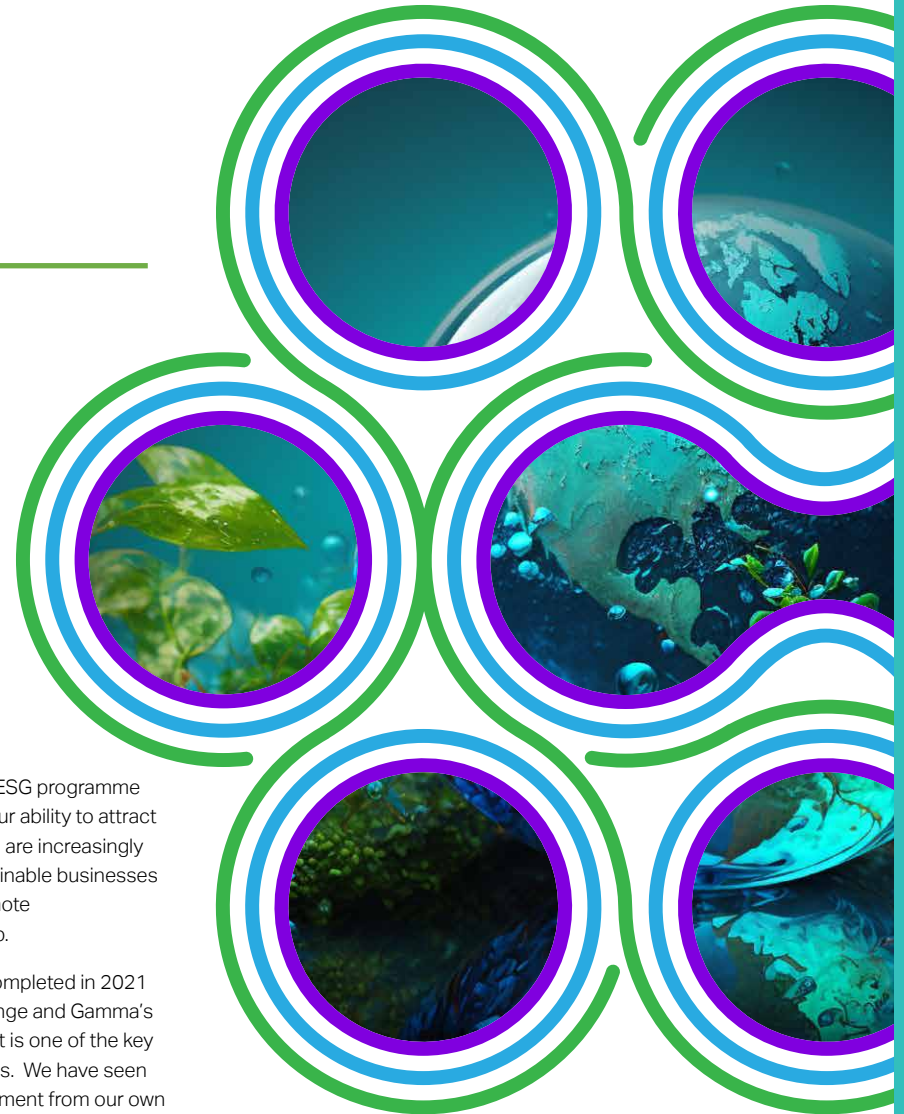
Using this improved emissions data, we are now working towards validation of our carbon net-zero targets by the Science-based Targets initiative (SBTi). Net-zero differs from carbon neutral in that it requires a significant reduction in emissions to a point at which we can demonstrably show any remaining emissions are business critical.

Using disclosures such as the Carbon Disclosure Project (CDP) and the Taskforce for Climate-related Financial Disclosures (TCFD) we have increased the understanding of our impact further by assessing how

different climate change scenarios may impact our business (either directly or via our value chain) and the likely impact of operating in key areas of biodiversity (KBAs) and/or water-stressed areas.

We believe that our wider ESG programme has a positive impact on our ability to attract and retain talent as people are increasingly attracted to work for sustainable businesses which champion and promote environmental stewardship.

The materiality exercise completed in 2021 indicated that climate change and Gamma's impact on the environment is one of the key priorities for our employees. We have seen great support and engagement from our own people through participation in environmental surveys about commuting, climate change quizzes and questions on webinars.



5.1 Emissions Data

Over the past couple of years, we have worked hard to understand our emissions data in full and have continually improved our data by including more sources that are captured under Scope 3 of the Greenhouse Gas Protocol. We have aimed to gather as much primary data as possible, reducing our use of benchmarked data.

In 2021, Gamma became a signatory to the Science-based target initiative (SBTi), with a view to setting a long-term emissions target premised around abatement action. We also appointed an Environmental Data Manager (EDM) to support our endeavours to improve our emissions data.

The EDM initially captured some indirect emissions sources that had previously been unable to be estimated. These included capital goods, fuel and energy activities (not covered by Scope 1 and 2) and employee commuting. Our employees were instrumental in this task, providing us with data and information about their commute, type of transport used and frequency they come into the office.

Over the past 12 months, we have given particular focus to the Scope 3 purchased goods and services category which is, almost universally, a company's biggest emissions source. You can read more about this work in the next chapter of this report.

GHG Emissions Results (Scope 1 & 2)

The following table shows the results and trends of our Scope 1 & 2 emissions over the past three reporting years, relative to floorspace and headcount.

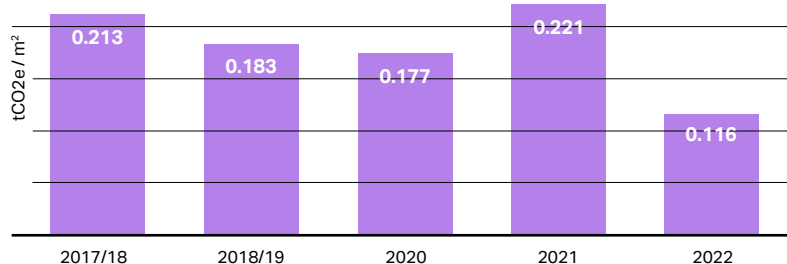
GHG Emissions Intensity Ratio (Scope 1 & 2 (location))	2020	2021	2022	Annual Change
UK GHG Emissions (tCO2e)	1,558	2,062	1,364	-33.85 %
Non-UK GHG Emissions (tCO2e)	53	821	479	-41.66 %
Total GHG Emissions (tCO2e)	1,627	2,883	1,843	-36.07 %
Total Floor area (m2)	9,175	13,041	15,973	+22.48 %
GHG Emissions per sqm floor space	0.177	0.221	0.116	-47.5 %
Total FTE	1,163	1,631	1,760	+7.91 %
GHG Emissions per FTE	1.40	1.77	1.05	-40.68 %

As a growth business we feel it is most appropriate to trend Scope 1 & 2 emissions against floorspace in communicating emissions intensity.

In the 2022 GHG Assessment, total floorspace increased by 22% year on year, providing an encouraging direct emission intensity trend.

For every m2 reported in 2022, Scope 1 & 2 tCO2e output equalled 0.116, a reduction of 47%. A similar trend is noted in respect of reported emissions relative to headcount.

GHG Emissions Intensity (Scope 1 & 2)



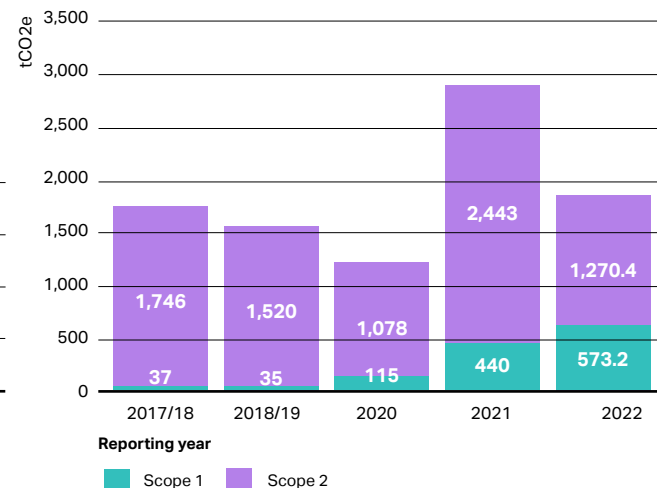
In terms of emissions sources from Scope 1 & 2 categories, the following table outlines contributions for 2022 and provides a year on year comparison:

GHG Scope	Aspect	UK	Non-UK*	UK	Non-UK*
1.	Heating Gas	33.07	67.75	36.20	32.10
	Refrigerant Gas	168.56	39.54	4.15	1.25
	Fuels	7.98	0.00	13.88	0.00
	Vehicles	48.70	207.60	102.17	250.13
2.	Electricity (location)	1,025.65	244.75	1,905.70	537.50
	Electricity (market)	100.50	43.40	665.38	327.72

* Gamma Germany, Spain, and the Netherlands

While year on year results can vary for numerous reasons, the contribution of Scope 2 emissions to our direct emissions impact has been constant over the past five reporting years:

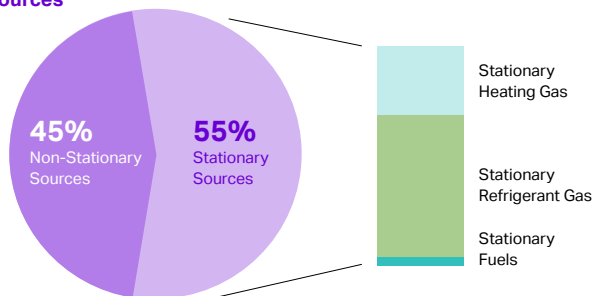
Direct Emissions by Scope (location-based)



Location-based Scope 2 emissions have fallen over 1,000t in 2022 (-48%). This is due to less energy consumption both in the UK and Europe combined with a reduction in emissions factors used to convert primary data into emissions estimates.

In total for 2022, Scope 1 sources have been accounted for at 537.2 tCO2e emissions (+22%) and are broken down as follows:

Scope 1 Emissions Sources Breakdown 2022



The following table shows emissions by source category for the 2022 reporting year, with selected indirect emissions (Scope 3) included:

Scope	Aspect	tCO2e
Scope 1	Direct emissions from owned, leased or directly controlled stationary sources that use fossil fuels or emit fugitive gases	316.9
	Direct emissions from owned, leased or directly controlled mobile sources	256.3
Scope 2	Location based emissions from the generation of purchased electricity	1,270.4
	Market based emissions from the generation of purchased electricity	143.9
Scope 3 (selected)	Water	0.5
	Capital Goods	167.2
	Upstream emissions from purchased electricity and fuels	418.8
	Business Travel	118.2
	Waste	1.5
	Waste water	0.9
	Transmission and Distribution (T&D) losses	393.0
	Hotel Accommodation	9.4
	Employee Commuting	564.1
Home working	295.2	
Total (using Scope 2 location figure)		3,812.4
Total (using Scope 2 market figure)		2,685.9

These Scope 3 emissions sources have been selected in this table as they are consistent with what was captured for the 2021 baseline and [Gamma Emissions Summary document](#).

Having included selected indirect emissions, the following GHG emissions profiles were recorded at group level using the location-based method:

Aspect / Scope	tCO2e (2022)	tCO2e (2021)	YoY Change (%)
Scope 1	573.2	439.9	+30.30
Scope 2 (location)	1,270.4	2,443.3	-48.00
Scope 2 (market)	143.9	993.1	-85.51
Scope 3 (selected)	1,968.8	1,610.2	+22.27

You can read more about the work that has been undertaken to better understand other Scope 3 emissions sources in section 5.2, including our approach to estimate our supplier/purchased goods and services emissions for the first time in 2022.

5.2 Suppliers & Scope 3

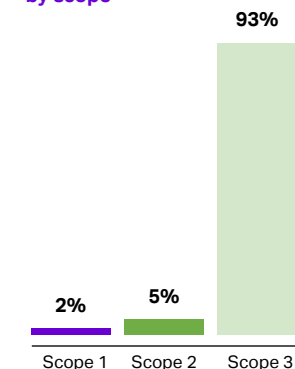
In 2022, we committed to better understand our suppliers and our indirect environmental impact, with a view to estimating carbon emissions associated with each relevant Scope 3 sub-category under the GHG Protocol.

In undertaking data gathering activities with our supply chain, we now have a deeper understanding of the scale of the emissions linked to indirect aspects, including the products and services we buy from our suppliers.

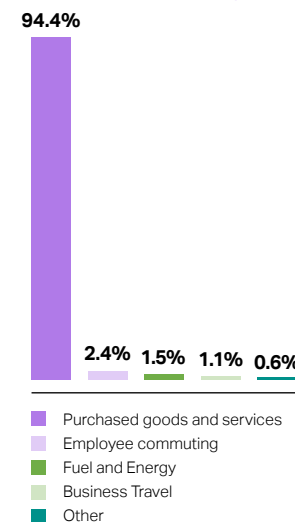
In total, Scope 3 emissions account for ~95% of Gamma’s carbon footprint, with emissions from our purchased goods and services category being the single biggest source (over ten times our Scope 1 & 2 output alone).

These numbers highlight just how important business collaboration and informed procurement decision-making will be in reducing the true environmental impact of our business and the wider sector over time.

Gamma Emissions by scope



Gamma Scope 3 Category



Case Study:

Calculating supplier emissions

In undertaking emission calculations from our suppliers, we first looked to use carbon conversion factors where these were reliable and applicable to the products and services we procured in 2022.

A good example of where we were able to do this would be our telecom points of presence (PoPs) which support the Gamma network operation.

Telecom PoPs are best described as the local access point for a network provider.

In short, where we pay for PoPs, we will occupy a small amount of space, usually in a larger datacentre. Typically, our supplier owns or controls the facility; and assumes responsibility for the purchase of electricity and the reporting of the energy consumption and associated emissions under Scope 2 of the GHG Protocol.

By understanding the presence we have in all facilities across the network, e.g. the floorspace we occupy, the number of racks and power demands, we can add up total energy requirement and convert this into an emissions estimate using an accurate electricity factor.

Having done this where possible for certain products, we then supplemented the 'product-based method' approach with a 'spend based method' for products and services that are more difficult to calculate emissions from, e.g. professional services.

For all Gamma suppliers that make up 75% of our total procurement spend, we calculated a percentage based on our spend relative to their revenue and applied this factor to their reported Scope 1, 2 and upstream Scope 3 emissions.

In doing so, we effectively apportion ourselves a fair share of supplier emissions, i.e. what our custom is responsible for, and put this in our purchased goods and services category.

Worked example:

Supplier:	Emissions (tCO2e)			
	Scope 1	Scope 2 (location)	Scope 2 (market) *	Scope 3 (Upstream)
Company A	100	500	200	10,000

- Gamma spend with Company A = £100,000
- Company A revenue = £10m
- Gamma spend as a % of Company A revenue = 1%
- Company A emissions = (100 + 200 + 10,000) = 10,300 tCO2e
- Gamma apportioned emissions = (10,300 x 0.01) = 103 tCO2e

* Where a supplier discloses a market-based figure, we use this to inform our calculations. This represents more accuracy as it accounts for renewable energy procurement on the part of our supplier.

Where needed, we have undertaken these calculations to cover the first 75% of our supply chain by spend and then upscaled this to estimate the emissions associated with the final 25% of our total spend.

We completed this exercise fully for the first time in 2022 and estimate that our procurement activities are responsible for around 30,000 tCO2e per year.

Our approach highlights the importance of engagement with our supply chain. It is key to us that suppliers are recording and reporting on their own emissions at a minimum, and then progressing to support initiatives and disclosures such as the Carbon Disclosure Project (CDP).

Alongside our efforts to encourage suppliers to respond to such disclosures, we also ask energy and emissions questions of our suppliers via risk assessments of potential new suppliers and questionnaires for our existing suppliers, as described in our [Ethical Procurement policy](#).

Positively, we are now in a position where we are able to assess the maturity of the supply chain in supporting our environmental goals.

At present, we know that:

Around half of our spend is covered by responses to CDP. This is encouraging as we can extract granular levels of emissions data from our suppliers' disclosures.

Around 40% of spend is covered by a commitment to reach net-zero using a science-based target. This helps to demonstrate that suppliers are committed to reduce emissions in line with a best-in-class framework.

Around a third of spend is covered by a response to TCFD recommendations. These suppliers are able to describe their assessment of climate related risks and opportunities.

With time we will be able to record the uptake in supplier engagement against selected frameworks, and target engagement efforts with suppliers who may be at the start of their sustainability journey.

Completion of Scope 3 emissions screening also allows us to progress our science-based target validation, which you can read more about in [section 5.7](#).

We aim to play a positive role in encouraging others to act more sustainably and consider environmental impacts in procurement activities for the benefit of our planet. We are committed to continually improve our data collection methods and look forward to working with our suppliers and peers to improve the quality of data available and to bring about meaningful emissions reduction initiatives.

5.3 Waste

While our operations carries low environmental impact from a waste management perspective, we are aware of the need to do more in support of the transition to a circular economy and apply the principles of the waste hierarchy in our day-to-day work.

We want to do this in order to reduce waste and play our part in preserving natural resources. Larger waste items tend to be network assets that need to be retired. If they cannot be reused, they are disposed of in compliance with the Waste Electric and Electronic Equipment Directive (WEEE Directive). Such assets are sent to a WEEE certified operator which is engaged to dispose of the items appropriately in compliance with the certificates they provide to the company.

Day to day, our environmental management policy and internal waste management procedure helps to promotes a culture of continuous improvement as we aim to improve our recycling practices towards zero waste to landfill.

We have also undertaken clean up initiatives in order to clear litter left by others and improve the local environment.

In 2022, we coordinated a day of clean up action: asking our staff across Gamma offices to join forces and spend a few hours cleaning up their local area.

For our colleagues that work remotely we encouraged them to get involved, highlighting the carbon cost of digital waste and what they could do to reduce their digital footprint.



Case Study:

Eco-SIMs

An example of how we have helped to play our part in preventing waste is our partnership with Thales which has deployed eco-friendly SIM cards across our network.

With 4.5 billion SIM cards produced every year – amassing up to 20,000 tonnes of plastic – Thales' Eco-SIM, developed in partnership with Veolia, is made from 100% recycled polystyrene recovered from discarded refrigerators.

Thales has provided SIM cards and related services to Gamma since 2016. This next step in the partnership acts as a force for sustainability within the telecoms market, offering a green plastic supply flow to Gamma.

Thales' carbon offsetting programme also ensures its Eco-SIM is certified carbon neutral, and as a result, supports Gamma's long-term commitment to safeguarding the environment and supporting net-zero beyond our direct value chain.

5.4 Water

From an emissions perspective, water consumption and wastewater are both low impact sources.

In 2022, Gamma consumed 1.21 mega litres of water, all supplied via landlord in offices / controlled datacentres, therefore incurring no direct withdrawal.

While we do not regard water as a material environmental aspect in our business operations, we do understand the need to consider 'water stress', which helps to describe how sufficient water resources are in a given region or country.

The publicly accessible WRI Aqueduct water risk atlas tool has helped us to evaluate the different levels of water stress across the Gamma group.

Operating Country	Water Stress
Spain	High
Morocco	Medium-High
United Kingdom	Medium-High
Hungary	Low-Medium
Germany	Low-Medium
Netherlands	Low
Poland	Low

Based on the floorspace of our offices and controlled datacentres, 6.56% of our operation takes place in regions with high or extremely high baseline water stress.

We consider it important to focus on these locations to extract as much primary consumption data as possible, with the aim of examining trends and managing water consumption to reduce local negative environmental impact.

Climate scenario data gathered as part of our plans to respond to TCFD recommendations indicates that variations in average temperature and precipitation over time can add to water stress challenges in the Gamma group.

The WRI Aqueduct water risk atlas tool has given us additional insight into climate factors such as seasonal variability, water depletion and drought risk.

As part of the emissions evaluation work across our supply chain this year, it was noticeable that water consumption reporting is in its infancy and we will continue to monitor progress using a range of disclosures.

5.5 Biodiversity

Gamma's operational impact on ecology and biodiversity is very low. At Group level there are three premises, all offices, within 1km of Key Biodiversity Areas (KBAs). Gamma will continue to assess proximity to KBAs in respect of staff premises and other facilities.



5.6 Carbon Neutrality

Gamma has been a certified CarbonNeutral® company since 2006 and we were the first telecommunications company in the UK to run a carbon neutral network. Since then we have extended our offset programme to include all business operations such as office premises and our fleet in line with The CarbonNeutral Protocol.

We are now focussing our efforts on reducing our carbon emissions in line with our carbon net-zero ambition, but we have pledged to compensate for our remaining unabated emissions through purchasing and retiring independently verified carbon credits on the voluntary carbon market.

We work with a carbon market specialist to independently validate our data and help align our purchases to our selection criteria.

Our CarbonNeutral® certification covers our full Scope 1, Scope 2, and Scope 3 emissions

in line with The CarbonNeutral Protocol. We aim to base our carbon footprint calculation on primary data as much as possible, for example, we have consulted with our employees to understand more about their energy use when commuting, and in their own homes when remote working. This has eliminated the need to use benchmarked data for these emissions.

Our purchase of carbon credits is considered in line with our support for the UN Sustainable Development Goals (UN SDGs). Gamma chose 4 of the UN SDGs to support, based on where we felt as a company that we could make the most impact.

All of the carbon credits purchased and retired by Gamma are independently verified against leading voluntary standards; Gold Standard, Verified Carbon Standard (VCS), Climate, Community and Biodiversity (CCB).

Recognising that the price of carbon credits on the voluntary carbon market is increasing year on year, Gamma chose to purchase credits across three new projects in 2022.

We believe that this investment will mitigate the risk of significantly increasing prices across the next eight years, enabling us to remain CarbonNeutral® across our current operational base as per our pledge.

Our current chosen projects aligned to each of our UN SDGs are;

	Project type	Standard	5	8	10	13
Bondhu Chula Stoves, Bangladesh	Clean Cooking	Gold Standard VER	✓	✓		✓
Guatemala Water Filtration and Improved Cookstoves, Guatemala	Clean Water	Gold Standard	✓	✓	✓	✓
Kulera REDD+ and Cookstoves, Malawi	Forest Conservation (REDD+)	CCB, VCS	✓	✓	✓	✓
Acre Amazonian Rainforest Conservation Project	Forest Conservation (REDD+)	VCS, CCB	✓	✓	✓	✓
Meru and Nanyuki Community Reforestation, Kenya	Forest Conservation	VCS	✓	✓	✓	✓
Improved Water Infrastructure, Uganda	Clean Water	Gold Standard	✓			✓

Case Study:

Clean Cooking – delivering emissions reduction, improving health, and conserving forests.

Gamma has chosen to support a project in Bangladesh that supplies clean cookstoves to families. But the link between clean cooking and improved livelihoods and health isn't always obvious.

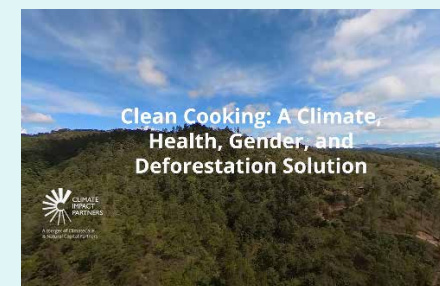
Over one billion tonnes of carbon emissions each year come from burning wood and charcoal to cook; that is 2% of total global emissions and the same amount as annual air travel. Additionally, more than half of the wood harvested globally is used for cooking and heating, with a significant 34% of wood collected for cooking used in an unsustainable way, contributing further to climate change and deforestation.

The Clean Cooking Alliance estimates that one in three people rely on polluting cooking fuels like charcoal, wood, and kerosene, and this 'dirty cooking is a leading source of carbon emissions and kills some four million people each year'.

Clean cooking projects, such as the one that Gamma has supported, reduces emissions by removing the need for families to cook over open fires using polluting fuel.

The projects can improve the lives of women and children, eliminating the need to spend up to 20 hours a week gathering fuel for cooking, impacting their health and education when they are unable to attend school.

Clean cookstove projects help to educate through encouraging behavioural change, reduce supply chain costs to reach rural communities, create sustainably job opportunities for locals in the manufacture and selling of improved cookstoves, and support innovation in clean cooking technologies.



Find out more about clean cooking and the impact projects can have in the [video](#)

5.7 Carbon Net-Zero Targets

As a business, we understand the need to address the climate challenge with ever more ambitious plans and targets.

Following our emissions baseline in 2021 and our full screening of Scope 3 emissions sources in 2022, we are committed to pursuing a science-based transition to net-zero emissions by 2042.



We are making this commitment in proud support of UNSDG Goal 13, which requires abatement action in respect of activities that produce emissions.

Therefore, throughout this transition, we are committing to maintain our status as a CarbonNeutral® company. You can read more about our CarbonNeutral® status in section 5.6.

Science-Based Targets (SBTi)

In order to progress our net-zero ambition through a best-in-class framework, we are delighted to report our signatory to the Science Based Target initiative (SBTi). As part of this journey, we are for the first time outlining our approach to adhere to the key principles of SBTi-backed net-zero plans.



SCIENCE
BASED
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

Near-term science based target

Gamma is targeting a reduction of emissions of at least 50% by 2030 which represents our near-term target date.

-50% emissions by 2030

We want to demonstrate our commitment to the climate change challenge and believe that we bear a responsibility to act decisively to remove a significant amount of our operational footprint in this decade.

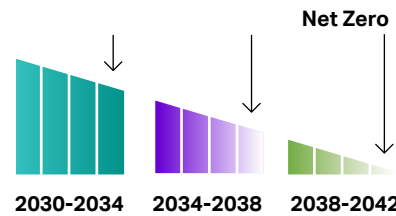
We plan to track our progress and hold ourselves accountable by reporting over two, four-year carbon reduction phases up to this point in time (2023-2026 and 2027-2030). By taking this approach, our stakeholders will be able to recognise our intention to fulfil

plans and better understand the areas we are having success in.

We will be able to communicate areas where we are falling back from our original targets. In doing so, we will be able to explain factors that may be holding us back and communicate potential ways forward, whether they be organisational, sectoral, or from external factors such as supply chain and market trends.

Long-term science-based target

2042 is Gamma's long-term science-based target to reach net-zero emissions.



This date gives us three additional four-year carbon reduction periods (from 2030), to reduce our emissions by at least 90% relative to our baseline results.

In pursuing this approach, we believe that we will be playing our small but important part in contributing to the global effort that aims to limit warming to 1.5C at worst.

Crucially for us, our long-term reduction target makes zero exclusions. As a company, we are including all emissions sources including Scope 3 categories, which represent upwards of 95% of our total carbon footprint.

In breaking down the individual contribution of Scope 3 emissions sources, it has become clearer that our procurement activities (purchased goods and services), constitute the company's major emission source.

Collaboration and partnering with our value chain will be critical in achieving our goals; our Ethical Procurement Policy will start to influence which suppliers we work with and encourage our smaller suppliers to set their own environmental targets, including emissions reduction. Wherever possible we will engage with our supply chain to influence their response to the climate change challenge.

Similarly, we will engage with our Channel Partners and customers where possible to discuss progress towards improved environmental management and disclosures.

Beyond value chain recognition

In the transition to net zero emissions by 2042 we will continue to take action to mitigate emissions beyond our operational value chain.

A considerable amount of employee engagement has already taken place to date, specifically in support of Earth Day and Carbon Net-Zero week as well as surveying the impact of local government proposals on commuting and wider day-to-day changes to the lives of our employees.

Engagement on environmental issues is well received across our organisation, and we have taken the approach to highlight positive ways in which we can all reduce our personal carbon footprint outside of work.

Our first company-wide survey on personal emissions received an encouraging response, with over 700 carbon reduction pledges being made!

The graphic shows the areas that employees are looking to more of in their daily lives. Additionally, to support our employees in their efforts, we send out an ESG newsletter every quarter which details our activities and contains articles on reducing personal environmental impact, such as reducing use of 'fast fashion', or choosing cosmetics and personal hygiene products that don't contain palm oil.

We intend to follow up the original survey with a second survey this year to see what changes our employees have made.

Neutralisation of residual emissions

We are steadfast in our commitment to maintain CarbonNeutral® certification in the transition to net-zero emissions and similarly, commit ourselves to invest in neutralisation of residual emissions once our long-term, science-based target has been achieved.



5.8 Carbon Disclosure Project (CDP)

In 2021 Gamma decided that we would enhance our commitment to environmental transparency by disclosing our environmental impact through the Carbon Disclosure Project (CDP), a global non-profit that runs the world's leading environmental disclosure platform. We have disclosed via CDP for the past two years, and for 2022 we completed CDP's Climate Change questionnaire.

Disclosing data around environmental impact is now a business norm. More than 680 financial institutions with US\$130 trillion in assets and 280 purchasing organisations representing US\$6.4 trillion in procurement spend requested environmental data from companies through CDP. A record 18,700+ companies responded in 2022.



By disclosing through CDP, Gamma is prepared to respond to the increasing demand for environmental transparency from financial institutions, customers and policy makers. In our disclosure, we shared a large amount of information from Board governance on environmental matters, to detailed greenhouse gas emissions, to risks and opportunities that we see within our own business in relation to climate change.

We are pleased to announce that we improved our score from a B- in 2021, to a B in 2022, reflecting our ongoing work in not only understanding our environmental impact, but in setting new targets to achieve our carbon net-zero date of 2042.



We are also encouraged to see that we have either maintained our 2021 score across the 11 different CDP categories or improved on the score for 2022.

The 2022 score of B means that we have been recognised by CDP as taking coordinated action on climate issues, and aligns us to other media, telecommunications and data centre services sector organisations across Europe.

CDP Supplier Engagement Rating

We were also very pleased to be awarded a A- Supplier Engagement Rating (SER) from CDP in 2022, reflecting the efforts that we have made in the past 12 months to improve our understanding of our suppliers when it comes to environmental management and Scope 3 emissions.

With this in mind, we hope that our disclosure will assist our suppliers and customers in extracting useful data pertaining to our activities. Emissions information will be helpful to organisations who are buying our products

as they can either seek to estimate their purchased emissions using the spend-based method, or, with time, access product-specific information from their procurement activities.

5.9 Taskforce on Climate-related Financial Disclosures (TCFD)

The Taskforce on Climate-related Financial Disclosures was formed by the Financial Sustainability Board, and it first published a framework in 2017 outlining guidance for disclosures relating to governance, strategy, risk management, and climate targets.

The UK Government subsequently introduced the first mandatory TCFD-aligned reporting for the private sector from 6 April 2022. As a company admitted to trading on AIM, Gamma is not yet required to report using the common set of requirements, but we have used the framework to guide us on how we might measure climate impact, assess risks and opportunities, and guide our environmental ambitions. TCFD will become a mandatory disclosure for Gamma from 2024 (for FY2023) onwards.

Using both CDP and TCFD, Gamma now works to a standard set of requirements to assess how climate change may impact our business strategy, our operations and identify which opportunities are available to us to ensure a smooth transition to net-zero. Both of these disclosures have also contributed to embedding environmental and climate change considerations into our strategic planning.

During 2022, Gamma completed climate-scenario analysis using three different pathways that describe different climate futures, all of which are considered possible depending on the volume of greenhouse gases emitted in years to come. You can read more about our approach and outcomes in [section 5.10](#).

Additionally, as a communications provider to both the public and private sector, we are aware that many of our public-sector customers require us to align our environmental planning to the ambitions of both their own organisation and those of the UK Government. We address these requirements by ensuring that we stay ahead of mandatory reporting, preferring instead to be proactive in disclosing our progress and plans.

Gamma supports the Taskforce on Climate-related Financial Disclosures and their recommendations to increase transparency of climate-related risks and opportunities. You can read the [Gamma 2022 report here](#) which has been written in line with TCFD recommendations.

5.10 Climate Risk

Gamma has always taken its responsibilities to the environment seriously and we are now working hard to not just offset our emissions, but actively reduce them as well, helping to prevent further global warming.

In line with TCFD recommendations, we have spent time examining risks and opportunities to our business across a range of different climate scenarios. This enables us as a business to assess potential physical and associated financial impacts of climate change under different circumstances and time frames.

We ensure that all climate-related risks are captured by our existing group-wide risk management framework and, as such, climate-related risks are reviewed by both the ESG Committee and the Risk Committee.

Our approach

During 2022, Gamma completed climate-scenario analysis on its main offices and data centre locations across the UK and Europe, using three different pathways that describe different climate futures, all of which are considered possible depending on the volume of greenhouse gases emitted in years to come.

The time horizons considered were medium-term, up to 2030, and long-term, up to 2050. We included climate (precipitation/wind), mean air temperature and freshwater as indicators in the analysis.

Additionally, we considered whether the countries in which we currently operate have made commitments to reach net-zero

emissions and planned for a smooth and orderly transition via immediate policy reaction.

Our management method regarding climate-related risks is to reduce their impact wherever possible, and our investment in dedicated environmental and sustainability roles has been key to this management process.

We have examined transition risks, as described by the TCFD recommendations, reviewing in particular the risk posed by climate change to our reputation and from emerging regulation. Gamma has many public sector and enterprise customers, for whom positive action on climate change is a requirement.

Understanding physical risks

Our telecoms network is critical to our business users across the UK and Europe and maintaining availability of that network is critical to our business. Gamma's vulnerability to heat, excess rainfall, flooding and heatwaves increases over time and is further exacerbated should the countries in which we operate fail to take decisive policy action concerning climate change mitigation.

We maintain an ongoing capital expenditure programme across our own network and data centres, ensuring that end-of-life kit is recycled into non-customer-facing parts of our network (e.g. our test servers) or replaced with more efficient technology if required. Gamma's existing business continuity policy and processes ensures that risks from acute climate-related events are understood and mitigated.

During 2022 we experienced an above-normal heatwave affecting our main Manchester data

centre and assuming that these events may become more normal, we have since taken action to ensure that the cooling system can continue to cope with heatwaves during summers.

In the longer-term, three climate scenarios were used to assess physical risk and how resilient the business is to certain climate aspects. These scenarios were selected to meet TCFD recommendations to assess business resilience under different scenarios, including < 2° C analysis.

Based on the coordinates of Gamma facilities in each country, several factors were assessed using verified datasets in order to quantify risk.

Analysis of physical risk factors in different geographic areas has informed our future planning considerations across Gamma locations, particularly where we have network infrastructure.

For example, while wildfires may be considered low risk in a whole business context, climate factors and scenario forecasting allow us to appreciate this risk is heightened in Spain and Morocco. Damage to infrastructure from fire therefore becomes a material climate-related risk in these countries, which may not have been previously considered in the absence of climate analysis.

Overall, we consider the impact of acute and chronic physical climate change risks to be low. This information will continue to be reviewed and will inform our strategic plans where relevant.

Transition Risks

One of key activities of the ESG Committee is to review and assess all existing and emerging

climate legislation. The most pertinent for Gamma at present are the mandatory reporting requirements in both the UK and Europe but we also monitor developments further afield given that we are a growth business.

We currently believe it to be unlikely that Gamma will be subject to litigation claims regarding lack of action to tackle environmental impact. We now have dedicated resources managing our environmental programme, assessing and disclosing greenhouse gas emissions, and we are in the process of validating science-based targets to support our carbon net-zero ambition.

Through strong governance, our ESG Committee and ESG Steering Group ensure that current and emerging regulation is frequently reviewed and responded to appropriately. Once targets are in place, then we are committed to disclosing through CDP, as well as producing a TCFD report. We are committed to disclosing transparently, highlighting if we fall short of target with an accompanying explanation. We also acknowledge that lack of action around climate-related matters could potentially lead to stakeholder concern or negative stakeholder feedback, including from our customers and employees. We believe that this risk is greater with our public sector customer base.

Understanding that this is a key material priority for our customers, suppliers, shareholders, and employees, we continue to commit to reducing our impact on the environment and we are making good progress, ahead of sector regulation, in capturing and disclosing environmental data.

6. Gamma People

Gamma is a company that seeks out passionate, purpose-driven people from diverse backgrounds who can deliver our business strategy and contribute to our future growth. As we continue to expand, we're entering a new and exciting direction that will mean that our ability to attract, develop, reward and retain talented employees stays central to our success.

Our whole purpose is to empower the people at the heart of good business and our social value programme supports our ambition to be a force for good. The drive towards responsible and sustainable business starts with people.

We have recently launched a new set of values which reflect our expansion into new countries, external changes and evolved ways of working. As a company that has always been customer-centric, the new values are designed to deliver the needs of the business, brand and culture and to serve our employees to create an environment where every employee feels they belong at Gamma.



We invest in the future of our people through on the job training, apprenticeships and graduate programmes, as well as opportunities for ongoing learning across a variety of subject areas related to technical, business and personal growth.

Gamma believes that ensuring a positive working environment for our employees across all of our businesses is a top priority and one of our fundamental responsibilities as an employer. Our commitment to a fair, diverse, and equal workplace is reflected in our policies and programmes and in 2022 we developed a cohesive Social Value programme based around our support for the UN Sustainable Development Goals and we have an active Charity Forum, ensuring that our impact on the communities in which we operate and society in general is positive.

Our 2022/23 plan focuses on four key aims, linked to Gamma's chosen UN SDGs.



Our aims are to:

- 1. Create communities and a sense of belonging internally and externally.**
- 2. Bridge the digital divide and create opportunities to improve the lives of others globally.**
- 3. Give back to communities through charity work, raising funds and supporting certain demographics, for example – inspiring young people into a career in technology.**
- 4. Raise awareness of important topics such as mental health, as well as improving employees' wellbeing.**

We have already begun our journey and this year we have partnered with various external stakeholders to support us.

6.1 Gender Pay Gap

Reducing the Gender Pay Gap requires significant effort and takes time for real change to be reflected in the annually reported figures. This is a challenge that is not unique to Gamma, and in our particular industry we see more men than women holding senior or specialist higher-paid roles. We recognise our role in continuing to support women in technology and we aim to always create an environment where men and women alike feel appreciated and valued in their positions.

We continually work to close the pay gap between male and female employees, and in addition to the official Gender Pay Gap reporting, an in-depth analysis was completed in 2022.

This was carried out on a directorate level basis to highlight areas for attention and to establish a realistic and actionable set of objectives working across the business. The Gender Pay Gap report for the snapshot date of 5 April 2022 shows 1,199 employees within the Gamma Telecoms Holdings Ltd UK workforce, excluding Mission Labs: 817 men and 382 women.

You can find out more in the full [2022 Gender Pay Gap report](#).

6.2 Employee Engagement

Gamma has always encouraged an open and honest culture. We want to champion the engagement of our employees by actively seeking feedback, this remains one of our top priorities.

We believe that engagement is a measure of how committed and how enthusiastic people are about their work and Gamma. When people are engaged, their sense of belonging is strengthened and they are more likely to be comfortable being themselves at work.

In championing employee engagement, Gamma runs two organisation-wide employee surveys each year via an external platform that allows for anonymity. The surveys ask questions centred on key business drivers. Managers and leadership can interact with any of the open comments anonymously, so protecting the employee and helping them to feel safe when providing their honest thoughts and views.

After each survey the leadership reviews comments and scores and works with teams to take action. Many managers put their own local action plans in place, and we believe this is having a positive effect on our engagement. We feedback survey scores in a timely and transparent way, outlining the focus points and what we are doing as a business to help address some of the feedback.

Historically take up of the survey as a mechanism to feedback has been high. During 2022 we had a 78% participation rate in March, scoring above the technology benchmark in 11 of the 14 areas that we surveyed. Our overall Group score was 7.7 (-0.2 below the technology benchmark). In December, we are delighted that the participation rate increased to 81%, with the overall Group engagement score of 7.9 reflecting a good score for businesses in the technology sector.

Both surveys in 2022 drove some of our key focus areas within employee engagement, including how we connect our people to our business strategy, career and growth opportunities around the business, and wellbeing.

In addition to the formal employee engagement survey, we established an Employee Forum in our UK Operations team, giving customer-facing teams an additional 'Employee Voice'. Actions are taken from that meeting and implemented wherever possible, and we have seen positive office-based initiatives that have been successful at not only encouraging people back into the office post-pandemic, but also successful at bringing people together for shared lunches and breakfasts.

Gamma has always prided itself on an informal open-door policy for all of our Executive Committee, who welcome direct feedback and comments from people across the organisation.

We hold quarterly all-hands calls where anybody in the organisation can dial in to hear our ExCo and other Gamma leaders discuss latest progress and developments. We hold an annual roadshow in offices, ensuring that financial and strategy updates are communicated in person by our ExCo and our senior leaders will often launch Gamma-wide initiatives in person at all of the UK and European offices.

6.3 Talent Development

Gamma is focused on attracting, retaining, and developing the critical skills required to support its strategic ambitions.

Each employee's learning journey at Gamma is supported by regular development conversations with their manager, on the job training, as well as more expansive virtual training.

During 2022 Gamma continued to use the induction and onboarding platform that was introduced in 2021. The platform provides a structured five-week induction programme for all new joiners to equip them with a foundational understanding of the Gamma Group, its products, markets and customers, as well as its way of working, culture and values. The platform supports the additional role-specific onboarding activity that already takes place across the business, including interactive technical product training. In addition, regular 'welcome days' (face to face and virtual) have been run to ensure that new joiners onboard effectively and hear key messages directly from the Gamma Executive Committee.

Learning and Development is further supported by the Gamma Academy and LinkedIn Learning, which provides employees with access to over 16,000 expert-led courses, enabling continuous growth and development.

In 2022 we launched a new online training platform to support the roll out of governance policies and all employees are required to undertake a mandatory curriculum of training on compliance, health and safety, environmental management, anti-bribery and corruption, information security and data protection. Refresher training is required as per the policy.

As part of our new culture and values creating a learning organisation is one of our priorities and we are planning new ways to encourage career growth and opportunities for learning. For example, we are commencing a project to establish career paths at Gamma and trial the use of secondments for open vacancies to give internal candidates more opportunities to grow.

Apprenticeships and Technology Graduate Programme

The Gamma apprenticeship programme has continued during 2022 with 8 apprentices in various functions. Most of Gamma's apprentices are continuing studies from previous years, in some cases up to degree level, or existing employees continuing their professional development through the apprenticeship model.

Alongside launching a Technology Careers Site, Gamma successfully recruited and onboarded eight graduates into its Technology function in September 2022.

The aim of the programme is to offer graduates experience of four different areas of technology across a two-year period. We place our graduates on meaningful projects that align with our overall business strategy and we guarantee the graduate a permanent position at the end of successfully completing the programme. A second cohort of graduates will be recruited to start in September 2023.

You can find out more about our [Technology Graduate Programme here](#), including hearing more about the experience of joining Gamma from some of our successful technology graduates.

Case Study:

Technology Graduate Programme

I'm Florence, Technology Graduate

I studied for an MMath at the University of Manchester because I always loved maths and was good at it! I liked the fact that Gamma were looking for STEM graduates but didn't require any specific technology skills. It was also intriguing to me that you could take part in rotations in Software Engineering as well as Network Engineering, Business Analysis, UX etc. which I didn't know much about at the time, but learnt more about during the recruitment process.

While I love maths and knew that I was interested in coding and software development, I felt I'd be limiting myself if I didn't have the opportunity to use my people and creative skills, so Gamma felt like a good fit for me.

So far (in the Product Owner rotation) I have used my skills in communicating with others and adapting to their ways of thinking in order to understand and process ideas. This is a skill I developed in my degree when working with others on my course, and even to understand my lecturers, but is made more prevalent in the workplace because you're working with people who have many different roles and experiences.



I have also used my ability to break down and absorb complex information, reasoning skills, time prioritisation and management, determination to work things out even if they seem too complicated at first, and research skills.

6.4 Social Value

Gamma believes that work should be a force for good, whether for our employees, customers or for society. The drive towards responsible and sustainable business starts with people.

We play a significant role in society and want to make a positive impact to the communities we are in. We are committed to building a fair, compassionate and inclusive workplace and contributing to society in a positive way.

Social value is the positive impact created for society as a result of our contributions, at its heart we aim to help society progress, benefit and thrive. This includes creating value for our employees, customers and stakeholders.

As a result of change, organisations have started looking at the impact and value they create, not only for customers but for society. There is a link between businesses that prioritise social value and success, therefore our focus on social value is to differentiate ourselves from our competitors.

We know social value is important to our stakeholders and we will continue to focus on delivering our goals because it is the right thing to do.

Diversity, Equality, Inclusion and Belonging (DEI&B)

At Gamma, we are committed to creating an inclusive environment where everyone feels they belong. Belonging is integral to Gamma's culture and values. We therefore have a responsibility to ensure that our people are valued, treated fairly, treat others fairly in a workplace that is free from any form of discrimination.

We recognise that our people come from various backgrounds and have many differences and it is our belief that diversity, inclusion and belonging enhances creativity and innovation, which in turn enables us to achieve greater success.

We want to maintain a positive environment that focuses on nurturing diversity in all aspects – whether it be age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation and caring responsibilities. We recognise that different perspectives encourage innovation and helps us to succeed together.

Gamma partnered with the Employers Network for Equality and Inclusion (ENEI) in 2022 to complete a benchmarking exercise to understand the strengths and gaps that we have in our current approach, and this has helped us to define and set targets to improve. We have consistently scored above benchmark scores for Organisational Fit/Equality in our employee survey since October 2020.

However, the ENEI benchmark exercise focused on additional key areas such as Gamma's workforce, strategy, leadership and accountability, recruitment and attraction, training and development and other employment practices. Gamma also started to collect enriched demographics data to better understand its workforce and align its future plans to support and strengthen its approach to attracting, developing and retaining under-represented groups. This work will continue into 2023 and beyond.

Our DEI&B priorities are:

- Build a diverse and inclusive workplace where everyone is valued.

- Understand our current demographics and use this data to inform our strategy.

- Attract under-represented groups to Gamma so our workplace is reflective of the communities we operate in.

- Develop, engage and provide opportunities for all employees to grow and deliver their best work.

The roadmap for implementation will be delivered over the next 12 months, starting with a new programme called 'You Belong'. This is part of our Social Value and Employee Experience work which includes the establishment of employee communities around our organisation, some of which are sponsored by Executive Committee members.

These communities are initially focused on under-represented groups, including Wellbeing, Women, Multicultural, and Early Careers. Membership is open to all, and the communities are intended to be a safe place for employees to share experiences, perspectives, resources and actions to support DEI&B at Gamma. We believe that these communities will make a positive difference in how we operate as a company.

All of our priorities and DEI&B activities are underpinned by a Group EDI policy which sets out clear policy statements with regards discrimination and commitments. We will not tolerate any form of discrimination, victimisation or harassment and we are fully committed to the elimination of unlawful and unfair discrimination.

The composition of the Gamma Board has evolved during 2022 with the appointment of a new female non-executive board director. Women now represent 43% of our non-executive directors with gender diversity representation now at 40% across the whole Gamma Board.

We have also reviewed how diversity and inclusion is reflected in our recruitment processes, with senior leadership roles analysed at the long- and short-list stages with the aim of achieving greater diversity.

2022 Gender Data

Workforce	
Gender	% of Workforce 2022 vs (2021)
Male	68.14 (69.72)
Female	31.86 (30.28)

Managers	
Gender	% of Managers 2022
Male	66%
Female	34%

Market Benchmarking

We introduced professional market benchmarking in Q2 2022 to guide informed decision making on salary progression and new hires. This was implemented using the WTW (Willis Towers Watson) methodology and their participation-based salary surveys. In the UK we currently use the WTW Technology, Media, and Gaming Survey 2022. Over 100 individual job roles have been benchmarked using a 'Side-by-Side' exercise which includes the internal market comparisons. Gender and tenure are reflected in the Side-by-Side benchmarks to increase awareness and reduce any risk of potential bias.

In preparation for the Job Architecture project in 2023, benchmarked roles are assigned Willis Towers Watson (WTW) job levels based on job descriptions using an improved Gamma template.

There has been close coordination across all the UK and European HR directors on benchmarking and we will roll out market benchmarking across all geographies in the near future.

Digital Equity

At Gamma, we are committed to creating Gamma delivers communications with a conscience. We believe that everyone should have access to connectivity and be able to communicate and connect to anyone in the world.

Therefore, we will focus on the following priorities for digital equity:

- **Redeploy unused equipment to communities that need it.**

- **Bridge the digital divide.**

- **Increase IT literacy within our communities.**

We have partnered with an organisation called unconnected.org and have donated over a hundred laptops and redeployed them to low-income communities. Gamma's aim is to address this inequality at the early stages of education, and we will continue to donate equipment to low-income communities who need them.

Working in the communities in which the company operate, Gammas 'Direct' customer business unit has worked with local authorities in the Manchester and Portsmouth areas to support their efforts in tackling digital poverty, address emerging skills gaps and prepare young people for the world of work in addition to providing employment in the area.

Case Study:

The Unconnected and Gamma

Creating a more connected world

The digital divide is a global issue. For many of us, it might come as second nature to search on the internet, download files, create documents, or use social media platforms. But for those less fortunate, it is still something to be taught because there isn't access to the right tools and training.

To make a difference, Gamma has committed to the UN Sustainable Development Goals to achieve Gender Equality and Reduce Inequalities. Uganda has one of the biggest gender divides and lowest connected populations in the world, with only 19% of women online compared to 27% of men. Gamma aims to bridge the digital divide and increase IT literacy in all communities.

As part of our strategy to tackle digital poverty and achieve gender equality, we have recently partnered with unconnected.org to provide laptops to high school children in Uganda as part of a digital learning programme. Gamma's effort was instrumental in setting up a computer lab, which now hosts 40 machines for children to use daily.

The computers have been used to teach the children about online safety and wellbeing, as well as their regular course curriculum and give them experience in independent research.

Ben Mansell, Founder & Chief Operations Officer of unconnected.org, added: "To create a computer lab with internet-connected laptops is a major step forward for these students in Uganda, their educational achievements and employment prospects on leaving education.

"By demonstrating the value this lab has delivered, it is anticipated to encourage further investment in educational technology from other philanthropic corporates and, ultimately, governments, not only in Uganda but in all countries where it has yet to become standard. Only with donations such as the one given by Gamma can we start to make a real difference."



Early Careers and Supporting Younger People

As part of Gamma’s goal to impact and inspire young people the company has formally partnered with Speakers for Schools and is designing a nationwide programme to support young people with understanding the technology industry, raising their confidence levels, mentoring and providing opportunities for work experience.

During 2022, a cross functional Gamma team delivered a STEM (Science, Technology, Engineering, and Maths) insights day to school students across the UK for their Predict Digital Campaign. The aim was to inspire young people to learn more about the communications industry, Gamma and the world of work.

The company also hosted a Workplace Safari where students from Manchester Communication Academy visited Gamma’s local office to learn more about the company. The event is part of local careers programme to encourage and create more interactions and work experience with local employers. Gamma has a broad range of colleagues that volunteer to support these events to help inspire students and provide them with a wider perspective on what their options are for their future careers and opportunities.

Gamma’s technology teams have continued to provide remote Hi-Tech Horizons sessions through an initiative run by the Education Business Partnership. The initiative aims to engage and inspire the future workforce, raising awareness of the hi-tech sector and the opportunities available.

This year the sessions have continued to run virtually, with Gamma recently reaching over 300 pupils across years 7, 8 and 9. Pupils were encouraged to work on their creativity and collaboration skills to design an app that would improve the lives of others.

At Gamma Germany, our IT apprentices have worked on the ‘Coding Kids’ initiative, and they have been teaching children coding basics at a school in the local community. They shared their knowledge on the responsible use of digital media, while also encouraging girls into STEM-based subjects.

Giving Something Back

Giving back to our communities and supporting charities is a key part of our social plan. We aim to raise funds for Gamma charities, increase our volunteering in the communities we operate in, and inspire young people into the work of work and technology. Gamma raised over £150k for charity in 2022.

Our Charity Forum

The Charity Forum was set up in 2021 and includes representatives from across key directorates. This was driven from ESG Committee objectives, aligned to our ESG principles and plans, and has the main aim of delivering a centralised, coordinated approach to charitable giving and fundraising across the business.

Our Charity Forum supports our people by ensuring that a clearly defined process exists for match funding, ensuring consistency and fairness. In total, the Gamma Charity Forum gave just under £50,000 for 30 different causes, supporting 24 of our employees in their effort to raise money for charities and organisations of their choice.

The forum has also organised different events for charity, supporting on-site events, donating sponsorship money, and setting up and match funding for charities such as UNICEF and MacMillan.



Case Study:

Gamma Anniversary Adventures

Gamma celebrated its 20th anniversary in 2022, and along with some amazing support from our suppliers, we set off on bikes to link up our UK offices by cycling a route all the way from Glasgow, to Manchester, onto Newbury and Port Solent, and finally onto London. At the same time, we asked everybody to log their activity during the same week with the aim of linking up all of our European offices virtually on an interactive map.



£16,800

We raised over £16,800 for our employee-chosen charity, UNICEF during the week.

The Gamma Ball Rally

The Gamma Ball Rally is a charity event for our Channel Partner Community. The event generates both funds and awareness for two chosen charities, Action Through Enterprise and SpecialEffect, while creating positive experiences and building relationships with our suppliers and partners. Taking place over three days, the rally dates back to 2013. There have been 7 rallies, 175 teams and 700 participants travelling to a fantastic range of destinations including Budapest, Dublin, Amsterdam, Frankfurt, Marseille, Munich, Geneva.

£700,000

The Gamma Ball Rally has generated a total of £700,000 for charity to date!

“Donations from The Gamma Ball Rally have been instrumental in establishing ATE and have made an enormous difference to people in rural Lawra, Upper West Ghana. You have enabled us to become a sustainable, innovative small charity which makes a real, long-term difference to thousands of children and adults. Your support has saved lives, and transformed a large community, making it possible for people to thrive in place where life is incredibly tough, where the sun is hot, the ground is hard, and most people live in poverty. We are extremely grateful for your support over the last decade and the huge difference that this has made.”

Action Through Enterprise

“As SpecialEffect celebrates its 15th year, the life-changing impact that the Gamma Ball Rally has had since our first rally in 2014 simply cannot be understated. Over £250K has been donated by Gamma and partners which in turn has enabled SpecialEffect to help people with physical disabilities from aged 3 to 83 to improve their quality of life through adapting technology that’s not only often a lifeline for communication, but which also helps so many to experience fun, freedom and independence and inclusion.”

SpecialEffect



Support for Ukraine

With the outbreak of war in Ukraine in early 2022, we were proud to make a small difference where we could. As well as raising funds directly for the UN Refugee Agency, we opened up employment opportunities to all Ukrainian refugees displaced by the conflict. We provided additional support with CVs and interviews, as well as in obtaining a visa and work permit.

We also introduced a Ukraine Support Package, meaning that for the UK we halted billing for calls to Ukraine across a range of our products. Mobile usage whilst roaming in the Ukraine was also free in an effort to support any customers located there.

Our German colleagues went to the German-Polish border not only with a range of items such as blankets and food etc but to bring back Ukrainians who had fled the conflict to Oberkotzau to live in safety with host families.

The Change Please Foundation

Gamma employees love their coffee! We have introduced new coffee machines into our UK offices which support the Change Please Foundation. Every coffee that is brewed using Change Please beans helps to change somebody's life for the better with 100% of Change Please profits going into giving people experiencing homelessness a living wage job, housing, training, onwards opportunities — and a fresh shot at a life.

The funds generated by Gamma over the past 12 months has contributed to over 40 hours of barista training for Change Please trainees.

Volunteering

All Gamma employees are encouraged to invest one workday a year to support charitable causes of their choice. We believe that volunteering is a key method to contribute to society and the planet, and together we can make a difference.

Wellbeing

Our employees at Gamma feedback that wellbeing is of vital importance to them, and although the opportunities that are offered by Gamma vary from one business to another, we strive to promote and provide a healthy environment by prioritising the mental health and physical health of all employees.

Benefits and Wellbeing

We support all our people in Gamma with a package of benefits that support financial and physical health, and family-friendly policies and these benefits are constantly reviewed and improved.

From a wellbeing perspective, our Employee Assistance Programme (EAP) service is available to our UK employees and offers free confidential advice 24/7. The service offers advice on a range of topics, including life events, mental and physical health, relationships, and work. We are aiming to roll out a similar service across our European teams in the future.

We have also offered UK employees access to a virtual GP service which provides immediate access to a private GP, as well as a Health Care Cash Plan which allows employees to claim money back for routine medical and dental costs.

Gamma offers a Cycle to Work scheme and optional Winter Flu vaccines.

Supporting Wellbeing

In 2022 we increased our focus on the general wellbeing of employees, celebrating a week of different events during Wellness Week in May 2022. We held a series of webinars, covering topics such as healthy minds, physical fitness, mental wellness and financial wellbeing with a 9.38/10 feedback score from employees, who felt that we had raised their awareness of important topics related to wellbeing.

Our managers are key to providing support for our employees' mental wellness and in reducing absence from physical and mental illness. We have rolled out online Mental Health Awareness training to all managers to help them provide support for individuals on their teams and to help identify those who may be struggling with their mental health.

Our employee engagement survey always includes questions about wellbeing; we know from feedback that physical and mental health support is important to our employees and we continually seek to improve the communications and information available throughout the organisation.

Case Study:

Our Wellbeing Team

Gamma introduced a small team of dedicated, trained Mental Health First Aiders in 2019, and this has since expanded to become a team of 12 MHFAs across our UK offices.

The MHFAs act as a first point of contact when employees experience a mental health of emotional issue and can signpost to additional internal and external support resources if required.

Financial Wellbeing

Gamma offers its employees a range of benefits linked to financial wellbeing. All eligible employees are auto-enrolled into our Group Pension Scheme and our provider offers a range of investment choices including responsible investment funds linked to companies that are putting key climate change commitments in place.

To reflect market volatility that we have seen on pensions over the last 12 months, we have increased our external governance reviews of our provider from half yearly to four monthly. We have also introduced pension webinars to all UK employees during Q1 and Q4 2022. We saw excellent participation rates and employee feedback, with some pension re-joiners.

Gamma offers a range of other benefits such as Group Income Protection, Group Life Assurance, and opportunities to buy Gamma shares through a Sharesave Scheme and/or a Share Incentive Plan. Many of our employees have invested repeatedly in these schemes since Gamma became a publicly listed AIM company and in 2022 the average monthly contribution was over £200.

Gamma Rewards is a scheme that offers supermarket and utility discounts, as well as discounts at major retailers across the UK. To support employees impacted by the cost-of-living challenges we increased our staff communications on our UK savings website and mobile app.

Cost of Living Support

The cost of living challenge seen in the UK during 2022 triggered a specific initiative to support our employees. To support employees and increase our recruitment and retention, a cost of living initiative was implemented in.

September and October 2022 as follows:

- **23k minimum salary in Gamma UK and Mission Labs benefitting c.150 employees**

- **£1k minimum one-off allowance, benefitting c. 425 employees at £30k and under**

- **£2k bonus pull-forward offered to bonus-eligible employees across all salary levels on an opt-in basis with c.550 employees participating.**