

Cromwell®

Keeping Industry Working™

2026 Environmental, Social, Governance Report

Message from our CEO



Our commitment to Environmental, Social and Governance (ESG) is no longer a 'business initiative', it's the foundation of how we operate, innovate and grow.

As a critical supply chain partner, we are trusted by thousands of companies to help them keep their operations running and people safe. The needs of our customers, especially those in high-compliance sectors such as aerospace and defence, or those with demanding shareholders, continue to grow.

This year, we accelerated progress towards our goal of net-zero by 2030. We have fully compensated for our scope 1 and 2 environmental impacts by remaining carbon neutral during 2025 and are now focused on our scope 3 emissions by reducing our direct impact and gathering full scope 3 coverage, helping our customers lower their own supply chain footprints. We are proud of our EcoVadis silver accreditation, which measures our approach to the Environment, Labour & Human Rights, Ethics, and Sustainable Procurement. We were delighted to also secure the top-tier Investors in the Environment green-level accreditation and win the Overall Outstanding Achiever Award at their annual awards (nominated by IIE given their audit outcomes).

Through ongoing investment in the safety and well-being of people, the protection of our planet, and the prosperity of our communities, we nurture a distinct culture. Our journey is guided by ethical leadership, inclusive opportunities, and unwavering care for the world we share. By embedding this protective care into our way of working, we deliver reliable independently tested, high-quality products and customer service that supports a secure, zero-harm environment on the shop floor.

Helping our customers to keep their people safe starts with keeping our own people safe. We continue to invest in health and safety training for our colleagues, with a particular focus on mental health and well-being, working with Mental Health First Aid England introducing ISO 45003 principles and policies in 2025. Our exclusive personal protective equipment safety brand, Halo, continues to do incredibly well with volumes doubling again this year. We committed to giving 1% of Halo sales to charitable causes each year, and this is becoming a significant donation to charities like Mind and the Diversity Trust.

Our ethics, compliance, and sourcing capabilities operate to world-class standards, based upon ISO audits and independent customer audit feedback. Our suppliers continue to test each batch of our exclusive brand products, providing our customers with quality assurance second to none. We were recertified for all our quality accreditations, including ISO 27001, which covers information security, and we are currently completing the Cyber Essentials+ accreditation. Such strong governance means you can always trust us to do the right thing and eliminates regulatory headaches for customers.

Our diversity, equity, and inclusion scores remain very high, and our colleagues' engagement scores are over 80%. Having been ranked among the top 50 places to work in the UK on Glassdoor twice in recent years, we continue to see strong colleague engagement.

I am proud of all that the Cromwell team has achieved over the last year, and as we look ahead, we will continue to be guided by our purpose – to help our customers keep their operations running and their people safe, and to ensure we create a powerful legacy.

Ultimately, our ESG journey is our commitment to our customers – protecting their operations, their people, and helping their business to thrive.

Neil

About this report

Environmental Social Governance is an embedded and important programme across our organisation. Cromwell continues to show our commitment to embedding sustainability into our core business strategy. The aim of this report is to share and showcase all aspects of this programme using a data driven approach to track and report on our performance on environmental impact, social responsibility and governance practices. The data reflects our 2025 position.

Our Environmental Social Governance Report is produced by our Compliance Team who are responsible for our ESG Programme, led by our Director of Compliance and Financial services, sponsored by Cromwell's Board of leaders team. If you require any additional information about any element of this report, then please contact: **HSQETeam@cromwell.co.uk**



Cromwell at a glance

We believe that those who make, manufacture, and maintain the world around us deserve the very best support.

From power and cutting tools, abrasives, PPE, cleaning and hygiene equipment to inventory management systems, hand tools, and more, we offer everything businesses need to keep their operations running and their people safe.

The Cromwell success story began in 1968 with one man. Now, more than 50 years later, we have a huge network of branches, talented salespeople, and knowledgeable technical experts spanning the whole of the UK and beyond.

Our reliable and customer-focused service means our customers can be confident they will get exactly what they need, when and where they need it.

From preventative maintenance to emergency purchases, customers trust us to help keep their operations running. And when they need advice or support – from a product data sheet to the expert opinion of a technical specialist – we're always here to help.

£236m
in revenue

53k+
active customers

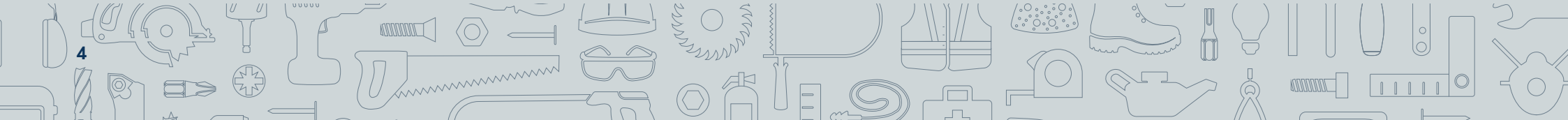
1200+
employees

600k
product range

5,900
suppliers

The Cromwell difference - keeping industry working

- Great products, great quality
- Reliable service
- The personal touch
- Easy to deal with
- Expertise at hand



ESG highlights, awards and accolades

Following on from our green accreditation from Investors in the Environment achievement in September, Cromwell were nominated and then declared winner in there category Overall Achiever for our commitment to sustainability.

Investors in the environment is a national environmental accreditation scheme designed to help organisations save time and money, reduce their impact on the environment, and get recognition for their progress. IIE is an accessible and proven route to help organisations get started on their sustainability journey and keep going.

Here's what the IIE said about Cromwell's win:

> Since joining iiE in 2021, the Cromwell Tools team have built on the foundations of a strong EMS and this year achieved their Green level accreditation.
>
> An impressive resource data monitoring system informs action planning to ensure performance remains on target, and wider environmental achievements and behaviour change have been aided by the company's comprehensive communications and staff training programme.
>
> Cromwell Tools have made considerable emissions reductions by investing in electric fleet, addressing energy efficiency across all sites, installing over 2300 solar panels on their premises and switching to a 'renewable' gas tariff.

Waste Management

100%

of waste diverted from landfill

Ethics and Compliance

100%

of required total company team members certified in Cromwell's Business Conduct Guidelines

| People

2025 social highlights

35%
of management is female

12
members of the DEI forum

26%
female population in our Senior Leadership Team

25
DEI Forum communications published



Diversity, Equity and Inclusion

Our commitment to DEI includes:

- Providing a fair and transparent recruitment Process.
- Creating an environment that promotes disclosure of diversity characteristics.
- Increasing the visibility and effectiveness of team networking groups.
- Consistently demonstrating inclusive leadership at all levels.
- Taking seriously and acting upon allegations of inappropriate language, situations, or practices and having the skills to mediate and investigate issues as soon as they arise.
- Ensuring our policies highlight to all employees that any form of discrimination is unacceptable, will be considered a disciplinary offence and will not be tolerated

DEI Forum

The purpose of the DEI forum at Cromwell is to create a safe space that allows everyone to seek different points of view and share their own perspectives and backgrounds with the goal of cultivating an environment where everyone feels welcomed and included.

We are all learning and want to support one another to learn and gain new perspectives.

DEI Forum 2025 Achievements

We implemented contemplation rooms at our head office and contact centre where we have a high volume of staff. As well as developing the Contemplation Room policy.

Raising greater awareness of the importance of DEI and the positive impact of having a diverse workforce.

Capturing DEI data to create a report which we can proactively use to tell a story of where we are and where we need to be.

Presenting to our sales and CSC teams to raise awareness around DEI, the forum and aligning the conversations to the new GTES, DEI Mindset training session.

We have new forum members increasing from 9 to 12 forum members.

We have produced a monthly Newsletter raising awareness of new areas such as neurodiversity, which has been well received.

Delivered a Neurodiversity, LGBTQA+, and DEI training session at the Learning Festival 2025.

We have started to share stories from our international teams celebrating events that are special to different communities, cultures and faiths.

We made period products available to all staff across all sites



Health and safety programme overview and performance data

Cromwell is committed to providing a safe working environment and ensuring that team members are properly trained to perform the variety of tasks necessary to support our customers.

As a global leader in industrial distribution, Cromwell achieves health and safety excellence by promoting:

- Safe people and processes for our operations across the estate
- Safe environments through correct product handling, storage, and waste minimisation for all business areas
- Safe distribution through proper transportation of hazardous materials

Our health and safety programme is integrated into all aspects of our business operations, keeping our team members safe and healthy, while keeping our facilities operating safely and sustainably. Our induction programme includes health and safety training for all new team members. Managers receive additional training on accident and near-miss reporting, alongside mental health awareness training to support all colleagues.



Cromwell Safety performance: 2021 - 2025

	2021	2022	2023	2024	2025	Avg.
Frequency rate RIDDOR reportable (per 100,000 hours)	0.07	0.13	0.10	0.10	0.00	0.01
Accident Incidence Rate (per 100,000 employees)	2	2	2	2	2	2
Total number of near misses	655	1249	1419	1829	2387	1502

Charity donations

Cromwell regularly donate products to Leicester Help the Homeless Centre and other charities or schools. Everything from paper roll and tissues and teas bags and bottles of water.

Over 2025 Cromwell offered 596 products to various causes equivalent to £9,088.

THE DIVERSITY TRUST
INFLUENCING SOCIAL CHANGE

mind

We donated £43k divided equally between **Mind for Mental Health and the Diversity Trust.** Our commitment to providing both Mind for Mental Health and The Diversity Trust **1% of profit from all Halo sales continues.**

3 GOOD HEALTH AND WELL-BEING

> I just wanted to say thank you so much for the incredible donations. It will do so much to support our work in advocacy and community particularly around diversity and inclusion and our mission to create a fair and safe society where everyone is included.
>
> We really value our partnership with Cromwell and the Halo range and applaud the organisation for being authentic champions for creating a more inclusive world so thank you all so very much.



Berkeley Wilde,
CEO The Diversity Trust

Talent management

Our CEO rating on Glassdoor is 92%. Our company rating is 4.2. Glassdoor ranked our diversity and inclusion score at 4.5 out of 5.

We have also tracked diversity and inclusion in our applications and hires. Over a third of all applicants came from females (against a gender split in our industry of 80/20 showcasing greater appeal with females than our competitors). Learning starts on the very first day when team members join Cromwell. We invite all new joiners to a welcome event, which showcases the Cromwell principles and the functions of the business. This sets people up well for success on day one, giving them an instant support network of new and experienced colleagues. This is followed up by targeted training and development, according to the individual's role. Managers will undertake people management essentials development and Lets Talk development sessions helping to get the best out of their people. For other colleagues, they have access to our Personal growth sessions which enhance the skills they already have, so they can be the best version of themselves. Many of these are completed within their first 3 months of joining, setting them up for success.

In 2022, we introduced Cromlead, which provides a two day development module for new managers, as well as Better Never Stops, a leadership programme for more established managers. Every year, we have a learning festival, which provides two weeks of dedicated learning. It combines on-the-job training with personal development in the form of wellbeing sessions, pensions support, diversity, equity and inclusion (DE&I) sessions, and much more. All of which is underpinned by the Cromwell principles. Alongside our internal programmes, we also have a number of people taking part in apprenticeships with external providers, giving them formal qualifications that support their ongoing development.

We use a continuous listening approach to understand and act on employee feedback and sentiment. Our listening strategy includes:

- Conducting an annual engagement survey with all Cromwell team members, followed by a check-in survey six months later
- Candidate and exit surveys to capture valuable feedback at the beginning and end of an individual's employment experience with Cromwell
- Facilitating regular roundtable discussions and team member calls involving our executive team. We hold our leaders accountable for discussing engagement results with their teams and crafting action plans based on the findings, to continuously enhance the team member experience.

Our engagement scores consistently surpass industry benchmarks and have seen continuous improvement, underscoring our dedication to creating a fulfilling and rewarding workplace for everyone.

| People

We continue to focus on helping team members grow their careers and be successful at Cromwell. We support their growth with differentiated learning and development options, including gaining cross functional experience through project work and work shadowing. We know that leaders who demonstrate our principles and gain experience across different areas of the business can help improve results, build high-performing teams, and better understand the business from end-to-end. Through regular talent forums with senior leaders, and biannual talent reviews, we get to know our highest potential emerging talent and identify ways to accelerate their development.

In addition to ongoing informal conversations, team members and leaders have two formal performance and development discussions each year plus goals setting sessions. Open, honest dialogue about performance, development, and career growth supports our principles, keeps lines of communication open, builds trust and helps to fulfil our purpose. We provide team members and leaders with resources to enable effective discussions on setting clear goals, delivering impactful feedback, and supporting individual career development. To further enhance these conversations, we have developed a guide to provide leaders with additional and consistent language to assess team member performance and to focus input for goal and development planning.

	2023	2024	2025
Team members completed annual reviews	100%	100%	100%
Team members completed goal setting	100%	100%	100%



Rewards and wellbeing

Our Cromwell Cares support program provides enhanced sickness, maternity and paternity pay, to support our colleagues when they are not at work, we truly care about their welfare and want to ensure they can be their best self without the worry of financial hardship.

Cromwell delivers a comprehensive Total Rewards program that allows UK colleagues to actively participate in benefits that are most important to them and their families. They are designed to combine longer term wellbeing benefits for the times when colleagues need them, with more immediate, tangible reward through benefits like our online discounts platform to put more money in their pockets.

Colleagues have access to a range of Lifestyle Benefits, such as Holiday Purchase which enables them to buy up to one weeks extra holiday each year, and the Cycle to Work and electric vehicle salary sacrifice scheme reduces the cost of travel by saving on Tax and National Insurance and helps the environment. They also have access to product discounts, gift card savings for well-known retailers, reduced price gym membership and offers on tickets for cinemas and days out.

We regularly seek colleague feedback through our engagement surveys and listening groups and conduct external benchmarking to ensure our compensation and benefits programmes remain competitive. Our recognition schemes enable individual and team performance and behaviours to be celebrated, and we continuously look for ways to invest in our colleagues during their time at work or at home with their family, in appreciation of their valued contribution and commitment to our business.



| People

STARTS WITH YOU

- Look after your physical health
- Relaxation and reduce stress techniques
- Sleep improvement techniques
- Continue to learn and be creative
- Connect with others
- Try to spend time in nature

RESOURCES

Medicash*

Help@hand*

OneHub

YOUR MANAGER

Start a conversation with your manager. Speaking to your manager will support open communication, help you get the support you need and helps to relieve your stress and worry.

MENTAL HEALTH FIRST AIDERS

Contact details and more information can be found on SharePoint.

Wellbeing support is always available through our Employee Assistance Programme providing confidential telephone advice 365 days a year, unlimited mental health support, physiotherapy services, medical second opinion, 360 wellbeing score, 121 lifestyle coaching, along with tips on a variety of health topics such as weight loss, exercise and meditation.

Our Healthcare Cash Plan provides money back towards the cost of everyday treatments such as optical & dental care, inoculations, and complimentary therapies such as acupuncture, physiotherapy and much more. Timely medical support can be obtained by access to a virtual GP and a prescription service, and we have Life Assurance provision in place to help families should the worse happen.

| Planet

2025 environmental highlights

Cromwell strives to operate its business and supply chain sustainably. We take proactive steps to align our operations with our commitment to environmental responsibility.

At Cromwell, we aim to be responsible citizens of both our communities and our planet. We strive to operate our business and supply chain sustainably, and continue to work with our partners and supply chain to achieve this, while also supporting our customers in their own sustainability efforts.

We recognise the urgency of climate change and are dedicated to reducing our carbon, water, and waste footprints throughout our operations and value chain. We are focused on reducing our dependence on non-renewable energy, improving energy efficiency, and embedding sustainability into every aspect of our operations.

100%
Renewable Gas and Electric

100%
Diverted from Landfill

21%
Reduction in Scope 1 emissions between 2023 and 2025

46%
Reduction in Scope 2 emissions between 2023 and 2025

Environmental management

Our approach

At Cromwell, we aim to be responsible citizens of both our communities and our planet. We strive to operate our business and supply chain sustainably, and continue to work with our partners and supply chain to achieve this, while also supporting our customers in their own sustainability efforts.

We recognise the urgency of climate change and are dedicated to reducing our carbon, water, and waste footprints throughout our operations and value chain. We are focused on reducing our dependence on non-renewable energy, improving energy efficiency, and embedding sustainability into every aspect of our operations.

Our ESG policy demonstrates our commitment, and our plan includes meeting short-term and long-term objectives, including:



Having a fully integrated management system which is ISO 9001, ISO 45001, and ISO 14001, ISO27001 accredited - providing policies, processes, and training materials to help meet our objectives.



Health, safety & environment (HS&E) meetings across all sites to provide working groups that promote continuous improvement opportunities.



Promoting awareness of ESG activities through all team member townhall updates.



A three-year plan, consisting of five pillars and championed by leadership, to set out clear milestones and objectives.



Supporting 'green champion' forums run by team members to monitor, measure, and deliver continuous improvement.



Customer ESG collaboration meetings to share current activities, discuss best practices, look joint projects, and learning opportunities.

| Planet

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Halo sustainability

Cromwell's Halo brand focuses on sustainability by integrating environmentally friendly practices into their personal protective equipment (PPE) products. We aim to reduce single-use plastics and ensure their products are durable and long-lasting. We are committed to keeping people safe whilst also considering the environmental impact of their products.



Bump caps constructed using ecofriendly reground HDPE for durability and strength



Cut F and Cut D sustainable coated gloves. Made with 30% recycled content



Sustainable T-Shirt GRS certified 100% recycled polyester



Sustainable Multi-pocket work trousers and sustainable stretch holster trousers



Safety hiker boots, vegan friendly, recycled microfibre upper



Safety goggles with replaceable lens to prolong usage and reduce waste

Manufacturing sites were move to more local sites to reduce product mileage





Sustainability services

As part of our commitment to helping customers achieve their own sustainability goals, we continue to enhance and improve our sustainability services.

Recent improvements include:

- Back-hauling waste for recycling. On average we back-haul 18.58 Tonnes of cardboard to our WDC every month for recycling
- Delivering in tote boxes to avoid all unnecessary packaging
- Carbide recycling through trusted partners, helping our customers optimise the life of their tools
- Self-service copy documentation via www.cromwell.co.uk to include invoices and proof of deliveries – removing paper from our processes
- Electronic invoicing with applicable back-up – eliminating paper and printing for both Cromwell and our customers

Transportation and shipping efficiencies

Our distribution and transportation network is designed to optimise the customer experience and reduce environmental impacts. Throughout our network, we actively manage order fulfilment with the goal of shipping orders in the fewest number of deliveries, using the optimal route to all locations. This is achieved using our Maxoptra tool.



Sustainable packaging

Our branded 100% recyclable boxes, made from sustainable resources, are used for deliveries from our distribution centre. In addition, to protect our customers' purchases, we add Airtech pocket filling, which is an on-demand solution used as an alternative to conventional air-pad film or pre-inflated bubble wrap. Airtech offers void fill protection at the push of a button, so only the right amount of box filling is used. Airtech air pillows are 100% recyclable and contain a minimum 50% recycled content.



| Planet

Vendor Managed Inventory (VMI)

Vending systems are fully managed services that reduce the time and costs associated with controlling replenishment of low-value, fast-moving MRO (maintenance, repair and operations) consumables and PPE (personal protective equipment) products.

For more than 25 years, we have used information technology to develop extremely lean and low-cost solutions that enable our customers to access the key benefits of inventory solutions, without the need for expensive and complex integration.

We can provide simple barcode-driven stock check and replenishment services, through to state-of-the-art industrial vending solutions that support user accountability for consumption and waste.

Cromwell does not offer standard packages. In our experience, customer expectations and objectives for managed inventory can be very different.

Instead, we have partnered with Supply Point Systems, the world's leading supplier of industrial vending machines and software, so that we can select the right building blocks for each customer and create custom-designed solutions for the unique requirements of their business.

Vending benefits:

- Reduced product consumption, typically by 25% to 40%
- Lower inventory costs through consignment stock, as we charge at point of issue
- Improved productivity, as products are available when and where they are needed, rather than customers having to place orders or visit stores to restock
- Product traceability to help with product compliance and offer audit trails
- Reduced health & safety claims



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9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



EFFICIENCY

Auto-replenish stock, reduce walk and wait times, manage stock and accountability.



COST SAVING

25%-40% saving depending on your business needs.



AVAILABILITY

Products available 24/7 where and when you need them.



VALUE

Add value to your organisation with world class management information and data insights



BESPOKE SOLUTIONS

Customisable inventory management solutions to cater to your business needs.



MAINTENANCE

24/7 maintenance support from our team of expert field technicians

VMI benefits:

- Improve purchasing efficiency by reducing suppliers, orders, and invoices freeing up time and reducing purchase-to-pay costs
- Lower inventory costs by demand-driven replenishment – improving product availability and supporting inventory reduction
- Reduce replenishment costs, as we take ownership of restocking - saving money and reducing wasted staff time
- Improve productivity as users have 24/7/365 access to products at the point of use – reduces wasted time associated with visiting stores and sourcing products

Climate change disclosure and greenhouse gas (GHG) emissions

Cromwell has several initiatives in place to minimise our greenhouse gas emissions by reducing our energy consumption and our dependence on energy from non-renewable sources. These include:

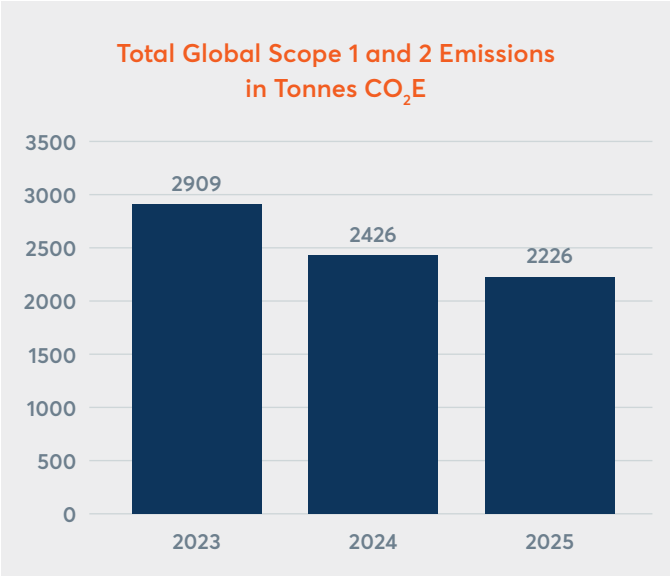
- Partnership with British Gas to ensure all electric and gas is renewable
- Replacing lighting with energy-efficient LED alternatives
- Fitting sensors in our World Distribution Centre (WDC) to manage energy consumption in less-used areas
- Replacing aged estate with A-rated buildings
- Providing electric vehicle charging stations for Company and team member use

Scope 3 emissions

Cromwell also recognises the importance of reducing Scope 3 emissions as part of our overall strategy. We continue to look at upstream and downstream continuous improvement opportunities. As part of this work, we have already reviewed our travel impact. While we cannot offset these emissions, we have partnered with "Just one Tree" which focuses on combating climate change through ecosystem restoration. Its purpose is not to offset polluting activities, but rather to actively support environmental restoration with the goal of reducing greenhouse gases and restoring biodiversity.

Cromwell's impact on local biodiversity

Cromwell is mindful of its potential impact on biodiversity and is committed to managing its operations responsibly. Several of our locations are situated near areas of local wildlife, such as the pond at our WDC, which supports fish, terrapins, herons, and foxes. Across the country, our sites are located close to diverse natural habitats, with species such as red squirrels having been sighted near our Aberdeen location. We also recognise that our environmental responsibilities extend throughout our supply chain. Our Supplier Code of Conduct requires suppliers to understand and manage their environmental impacts, including air emissions, water discharges, toxic substances, and the disposal of hazardous waste. Suppliers must comply with all applicable environmental laws and standards within their facilities and consider the effects of their operations on local communities.



JUST ONE TREE®

The 9082 Trees that were planted in 2023 have continued to grow and capture carbon throughout 2025 and will continue to do so for their lifetime.

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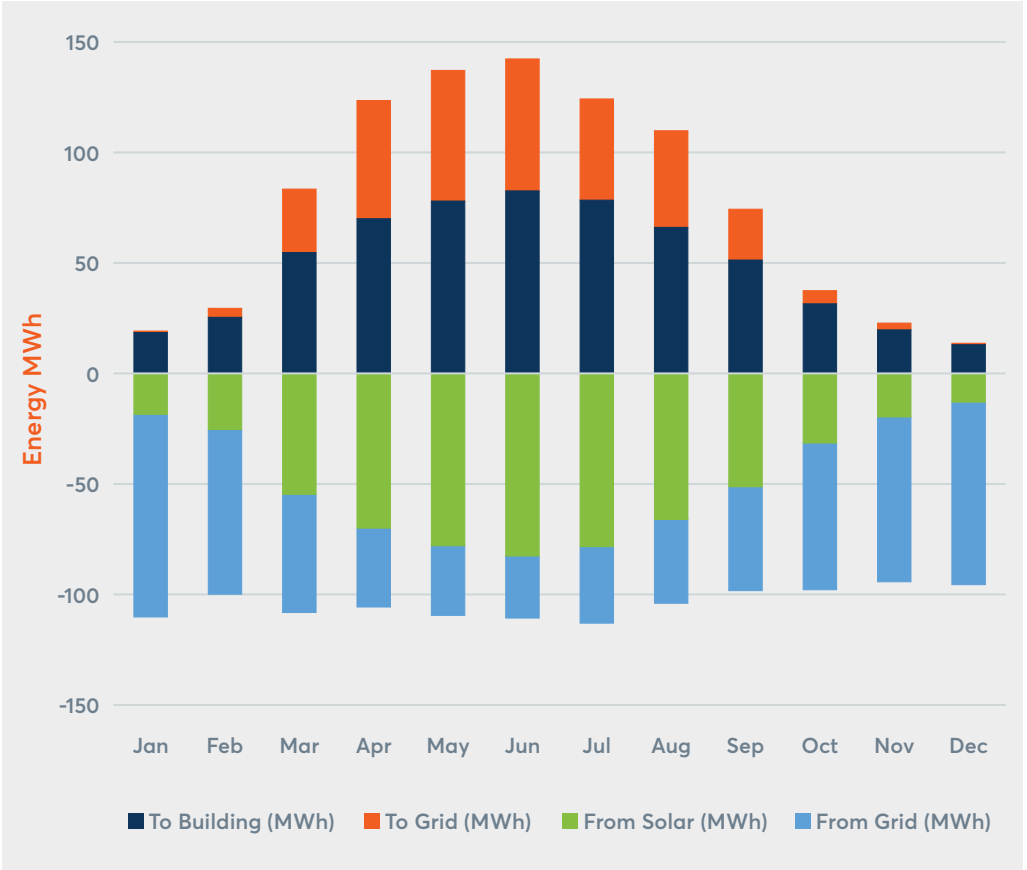


Solar Panels

2,325 panels have been fitted feeding power through six inverters. Essential roofing repairs have been done with circa 34,000 fixings and over 1,105 linear meters of corroded overlaps.

The solar array covers around 50% of the WDC roof space and produces circa 825,000 kWh of electricity. During the summer months, the system will produce enough power to fully support our WDC operation.

By using renewable energy at Wigston site it reduces our carbon footprint by 158 tonnes of CO2, equivalent of planting over 7,000 trees.



High-efficiency lifecycle replacements

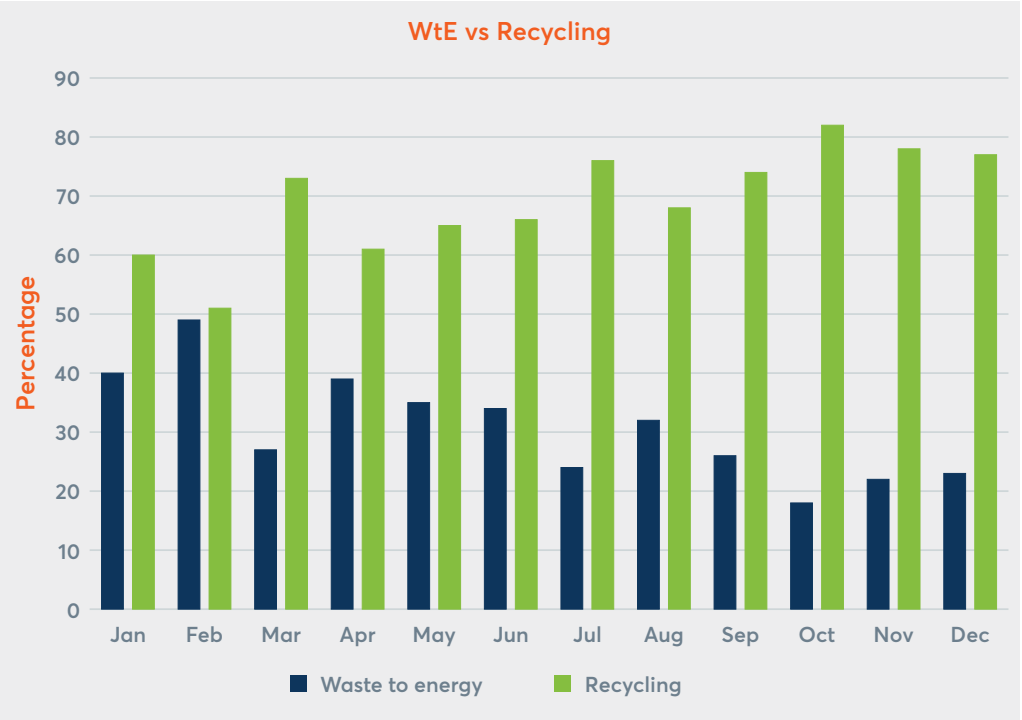
A core part of our strategy is upgrading equipment to more energy-efficient alternatives once it has reached the end of its useful life. One way we do this is through retrofitting LED lighting. As an example, at our Bulk Receiving Centre (BRC) Whetstone warehouse, we achieved an annual energy saving of 166,650kWh, reducing our carbon footprint by 61.8 tonnes.

Waste and recycling

At Cromwell, we focus on reducing or eliminating waste. This, combined with standardising our recycling processes and sharing best practice, has enabled us to achieve 99.9% non-landfill waste across our estate.

Our new partner with our waste management is Bakers Environmental Solutions, a family-owned business with similar principles and values. Our vision together is to create an environmental legacy for our future generations.

One of the operations Bakers Run is the InsideOut academy which involves inmates to attend workshops where they learn new skills and gain qualifications to boost their employment prospects upon release. Inside the dedicated workshops faulty products that would normally end up at landfill are segregated and sorted for onward recycling by Bakers Environmental. Bakers Environmental themselves currently employ ex-prisoners through the InsideOut scheme. Larger items such as white goods and electrical goods can be stripped down in the workshops for recycling or repaired, then sent onto charitable organisations.



Hazardous waste

As a distributor of maintenance, repair and operation (MRO) products, we do not generate hazardous waste through our processes or by-products – and we only handle products in manufacturers' packaging.

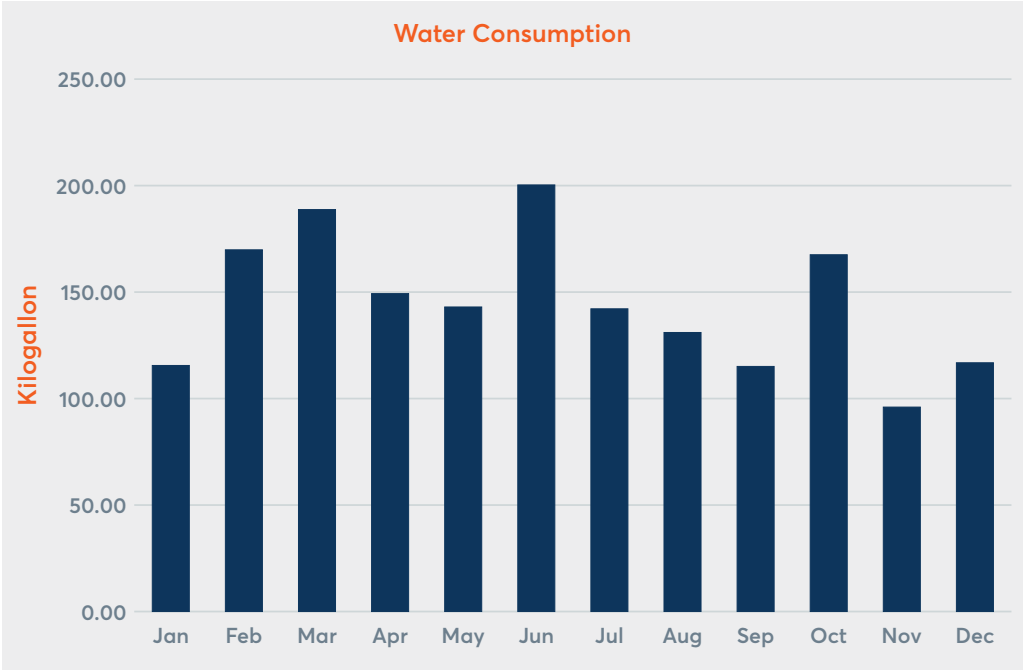
Cromwell does generate incidental hazardous waste from products that are damaged, obsolete or returned when no longer usable. Our waste-stream policies and processes ensure that regulated waste management is conducted in accordance with all applicable laws and regulations.

Carbide recycling and water consumption



Cromwell collected Carbide that otherwise would be waste so that it could be recycled.

	2024	2025
Kilos of Carbide	696	1423



Cromwell aims to reduce water usage across its operations by promoting responsible consumption and identifying opportunities for efficiency improvements. Through regular monitoring, good housekeeping practices, and awareness among colleagues, we seek to minimise water waste and reduce our impact on local water resources.

| Planet

Sustainable fleet and transport improvements

We have redesigned how we deliver to customers by standardising our transport network. Our own fleet is now focused on supporting customers with more complex delivery requirements, while trusted logistics partners manage standard deliveries at scale. By optimising delivery routes, reducing unnecessary mileage, and minimising repeat visits, we have already achieved a reduction of approximately 150 metric tonnes of CO_2e per year.

We have partnered with DHL to enhance both sustainability and customer experience. This partnership enables:

- End-to-end shipment tracking
- Greater flexibility, including changing delivery dates
- Convenient collection options via local depots or collection points
- Future delivery innovations, such as locker solutions

Both DHL and our wider logistics network are continuing to invest in greener transport solutions. This includes:

- Expanding electric and low-emission vehicle fleets
- Reducing empty mileage through smarter route optimisation
- Developing more sustainable distribution centres
- Exploring electric HGV technologies

Our use of DHL's Coventry "Superhub" incorporates a range of sustainability features, including:

- Rainwater recycling for vehicle washing
- Energy-efficient heating and cooling via heat pumps
- On-site solar energy generation with battery storage
- Local woodland planting to support biodiversity

Approximately 150 metric tonnes of CO_2e reduced per year



FSC-verified products

Cromwell offers FSC-verified products alongside other certified items, ensuring materials are sourced responsibly and meet recognised environmental and quality standards. FSC stands for the Forest Stewardship Council, an organisation that promotes responsible management of the world's forests; this is important because it helps protect natural ecosystems, supports sustainable supply chains, and gives customers confidence that they are making ethical and environmentally conscious purchasing decisions.

TORK

Centrefeed Wiper Roll, 2 Ply, 6 Rolls

MOL-952-1280T

- EU Ecolabel certified
- FSC certified
- FSC chain of custody

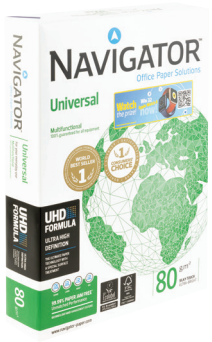


NAVIGATOR

Universal White Paper A4 80gsm Ream, 500 Sheets

NVG-805-0100K

- EU Ecolabel
- FSC Approved



SKYTEC

Eco Copper, Mechanical Hazard Glove, Latex Coating

GLB-961-0914A

- Recycled Claim Standard certified



Quality Strategy: 3rd party independent testing

Ensuring Integrity and Accountability Through Third-Party Validation

As part of our ESG commitment, we have implemented a quality strategy founded on independent product testing, aligning our products with the highest standards of safety, reliability, and transparency. By prioritising third-party evaluation rather than internal assessments, we avoid any potential bias and provide stakeholders with credible, objective assurance about our products' performance and safety.

Why Independent Testing Matters

We believe that quality cannot be self-certified. For this reason, our products undergo rigorous assessments by accredited external laboratories and certification bodies, rather than relying on in-house validation. This impartial approach ensures:

- Objectivity: Independent experts have no stake in results, guaranteeing unbiased outcomes.
- Regulatory Compliance: External testing partners ensure our products consistently meet or exceed global standards.
- Stakeholder Trust: Certifications from reputable third parties underpin consumer, investor, and regulatory confidence.

Our Approach

- All products are submitted to independent, accredited labs for comprehensive safety and performance testing.
- Continuous engagement with external testing organisations ensures our products adapt to changing regulations and best practices.

Continuous Monitoring

Our commitment extends beyond product launch: we routinely monitor non-conformances & return rates, independent testing and feedback mechanisms to address any emerging risks or regulatory changes. Total number of product fault reports across own brand and national brand in 2025 was 379.

ESG Impact

This strategy strengthens our ESG profile by demonstrating accountability, ethical governance, and a dedication to product safety. By relying exclusively on independent product testing, we ensure that our quality standards are not just promises but verified facts—building lasting trust with our customers, partners, and communities.

National brands

At Cromwell, we offer a wide selection of national brand products, sourced from our trusted supplier partners who are experts in their respective industries. To ensure we are partnering with suppliers that represent socially responsible procurement practices, all vendors are required to acknowledge the supplier handbook. In the event of a safety or recall issue, our Product Safety team partners with the supplier to determine the best course of action. If required, the team promptly implements a stop sale into the Cromwell system, preventing us from shipping these products to customers. We then work with the supplier to determine how to resolve the issue. Once the situation is resolved to the satisfaction of the supplier and Cromwell, the stop sale is lifted.

| Governance

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

100% of Employees must complete Ethics and Compliance Training

Ethics and compliance

Our commitment to doing the right thing is ingrained in our company history, our culture of compliance, and our Cromwell Principles. Our stakeholders trust Cromwell to operate with the greatest integrity, and in turn we hold ourselves accountable to full compliance with local, national, and international laws and regulations. We maintain our culture of compliance and ethical standards through a robust framework of policies, training, and reporting.

Policies and training

Team members regularly complete training to fully understand our expectations of legal and ethical behaviours. Through our online learning management system, we provide additional ethics and compliance training to colleagues globally, based on their role in the organisation. Examples of this training include anti-bribery and corruption, data privacy and security, government code of ethics, trade compliance, and workplace behaviour.

Anti-bribery and corruption

Cromwell places the highest value on integrity in our business dealings and in the ethical conduct of our directors, officers, team members, agents, shareholders, customers, and suppliers. We are committed to business practices that are consistent with the highest ethical and legal standards. Cromwell expects the same ethical and legal commitment from third parties (business partners, brokers, consultants, and agents) acting on our behalf, and others with whom we conduct business.

Reporting and grievance mechanisms

We encourage team members to report any ethical concerns or complaints about Company or individual practices. Individuals may raise concerns via various channels, including via management, human resources, legal, compliance, or the Board of Directors. Any concerns raised through our various channels are treated confidentially, thoroughly investigated, and reported on a quarterly basis to leadership and the Audit Committee of the Board of Directors by the Chief Ethics and Compliance Officer. Cromwell does not tolerate any retaliation against any colleague for making an inquiry, initiating a complaint, or participating in an investigation.

Code of Conduct

Cromwell and its affiliates, subsidiaries and divisions (collectively, "Cromwell") operate in a responsible manner. For us, the way we conduct our business is as important as the products and services we provide. We will only do business with Suppliers that comply with applicable and controlling laws, rules and regulations (collectively "applicable laws") and, as a minimum, with standards of business conduct consistent with those set out in this Supplier Code of Ethics ("Code").

We expect Suppliers to comply with applicable laws and the standards set out in this Code, and to ensure the compliance of their employees, sub-suppliers, and any other parties involved in carrying out work for Cromwell, where permitted by a Supplier agreement.

Fraud

Cromwell prevents fraud by implementing robust controls, continuous monitoring, and strict compliance processes to detect and stop fraudulent activity early.

Money Laundering

We work to actively prevent money laundering by applying rigorous anti-money laundering (AML) checks, customer due diligence, and ongoing transaction monitoring to identify and report suspicious activity.

Business continuity and governance including supplier stewardship

Conflict minerals

Our Conflict Minerals Policy supports the aim of the Dodd-Frank Act to prevent armed groups in the Democratic Republic of the Congo (DRC) and the surrounding region from benefiting from extracting and trading minerals, including tantalum, tin, gold, or tungsten, sourced from the DRC or the surrounding region.

Product safety, quality, and governance

Although Cromwell does not manufacture the products we distribute to customers, we take product safety seriously. We have established a Product Safety Committee made up of senior leaders from the Product Compliance, Legal, and Supplier Management teams. This committee convenes regularly to provide ongoing governance and oversight of product safety, quality, and compliance.

Private label

To ensure high-quality private label products, our engineering team conducts product evaluation and testing and engages directly with suppliers. This engagement includes conducting investigations and factory audits, as well as continually working to ensure our suppliers have the appropriate equipment and processes in place to deliver consistent quality products. If quality issues arise, the engineering team typically investigates, performs appropriate product testing, and summarises its findings. These findings may lead to corrective action including, but not limited to, supplier improvement in tools or processes, applying a stop sale, sending products back to the supplier for rework, or recalling products.

We also evaluate Cromwell private label products to confirm they meet our responsible sourcing guidelines. Suppliers who provide Cromwell private label products through Cromwell Global Sourcing (GGS) complete an annual social responsibility survey, which indicates the suppliers' compliance with social responsibility measures.

Product and supplier stewardship

To ensure the products we distribute are manufactured and delivered with high ethical standards, our Supplier Code of Ethics focuses on the following key areas of ethical sourcing:

Human rights and labour standards, Health and safety, Environment, Sanctions, Bribery and corruption, Conflicts of interest, Privacy and data protection, Reporting concerns.

All Cromwell suppliers and their sub-suppliers are expected to comply with the Supplier Code of Ethics as a condition of doing business with Cromwell.

Our Category team works with our suppliers to improve operational performance, advise on our shipping requirements, and ensure compliance on orders shipping into our network and orders delivered directly to our customers. The Category and Inventory teams monitor supplier performance on a monthly basis, with a monthly balanced scorecard. Specific metrics, such as stock fill rate, drop-ship availability, and shipping compliance, allow Cromwell to provide exceptional customer service.

We provide feedback and possible corrective actions to resolve issues on any metric that falls short of our target. This is managed in accordance with ISO 9001.

Human rights

Cromwell is commitment to providing a safe and fair workplace that upholds and respects international human rights standards. These principles are applicable to all Cromwell team members and are approved and monitored regularly by Cromwell senior leadership. Our Human Rights Principles create the foundation upon which we build a respectful, inclusive, and ethically sound workplace. Harassment, exclusion, discrimination, child or forced labour, and violation of any applicable laws or regulations are explicitly prohibited as part of these principles.

ISO 27001:2024 – key benefits for customers and our accreditation journey

ISO 27001:2024 sets out a structured framework for protecting sensitive information. It focuses on identifying risks, implementing appropriate security controls, and continually improving practices to respond to evolving threats.

Our journey: Three Years Certified

Achieving certification required thorough external audits and ongoing internal improvements. We continue to uphold these standards through regular reviews, continuous monitoring, and comprehensive staff training programmes.

Benefits for Our Customers

- Improved Data Security: We proactively identify, assess, and manage risks to safeguard your information.
- Regulatory Compliance: Our processes align with requirements such as GDPR and HIPAA, reducing compliance burdens and risks for customers.
- Trust and Confidence: Certification demonstrates our commitment to protecting sensitive data and maintaining robust security practices.
- Competitive Edge: ISO 27001:2024 distinguishes us as a security-focused and reliable partner.
- Continual Improvement: We consistently refine our controls and processes to stay ahead of emerging threats.
- Streamlined Onboarding: Certification helps accelerate procurement and due diligence processes for new customers.

Looking Ahead

Cromwell's commitment to ISO 27001:2024 ensures our security practices continue to evolve alongside emerging risks and technologies. Our dedicated security team actively monitors cyber threats and regulatory changes, adapting controls so customers benefit from up-to-date protection.

We invest in ongoing staff awareness and training, so every team member plays a role in safeguarding data. Our proactive approach to risk management and continual improvement delivers strong security, reliable service continuity, and effective compliance support. By partnering with Cromwell, customers gain a long-term ally focused on their success in an ever-changing digital landscape.

Privacy

Cromwell recognises the importance of protecting personally identifiable information (PII) belonging to employees, customers, and suppliers. This data is collected during normal business operations to fulfil services and support stakeholders. We protect PII from unauthorised access, use, or disclosure by adhering to globally recognised privacy standards and embedding data protection into our systems and processes. Annual privacy training is mandatory for all employees, with additional role-based training for those handling sensitive data.

Our Privacy Policy outlines how we collect, use, and manage information. We also support compliance with global regulations, including GDPR, by enabling individuals to exercise their data rights and providing transparency in data handling. Cromwell extends its privacy and security expectations to third parties. Partners, consultants, and agents must meet strict physical, technical, and administrative controls, which are assessed through due diligence and formal agreements.



Cromwell key performance data

Table 1. UK greenhouse gas (GHG) emissions and energy use data for period 1 January 2025 to 31 December 2025

Type of Emissions	Activity	kWh	tCO2e	% of Total
Direct (Scope 1)	Natural Gas	2,458,619	450	12%
	Company Fleet	4,922,956	1,462	39%
	Other Fuel (Generators)	1,053	0	0%
	Solar Generation	917,236	0	0%
	Subtotal	**8,299,865**	**1,912**	**52%**
Indirect (Scope 2)	Electricity	1,772,909	314	8%
	Subtotal	**1,772,909**	**314**	**8%**
Indirect Other (Scope 3)	Grey Fleet		1,250	34%
	Waste	1	83	5%
	Business Travel (Air & Rail)	4	7	1%
	Subtotal		**1,340**	**40%**
	Total Energy Use (kWh)			**10,072,774**
	Total (LB *) Emissions (tCO2e)			**3,707**
	Renewable Electricity (tCO2e)			**314**
	Total (MB *) Emissions (tCO2e)			**3,393**
	Number of Full time employees (FTE)			**1,429**
	Tonnes of Gross CO2e per FTE			**2.6**

Sustainable Development Goals

		2025		2024		
Type of Emissions	Activity	kWh	tCO2e	kWh	tCO2e	% of change
Direct (Scope 1)	Natural Gas	2,458,619	450	2,435,548	467	-4%
	Company Fleet	4,922,956	1,462	5,373,704	1,444	1%
	Subtotal	**7,381,575**	**1,912**	**7,810,242**	**1,911**	**0%**
Indirect (Scope 2)	Electricity	1,772,909	314	2,486,850	515	-39%
	Subtotal	**1,772,909**	**314**	**2,486,850**	**515**	**-39%**
Indirect Other (Scope 3)	Business Travel (Air & Rail)		1,250		1,217	3%
	Subtotal		**1,250**		**1,217**	**3%**
	Total Energy Use (kWh)		**9,154,484**		**10,297,092**	**-11%**
	Total (LB *) Emissions (tCO2e)		**3,476****		**3,644****	**-5%**
	Renewable Electricity (tCO2e)		**314**		**515**	**-39%**
	Total (MB *) Emissions (tCO2e)		**3,162****		**3,129****	**1%**
	Tonnes of Gross CO2e per FTE		**2.6**		**3.2**	**-18%**

** The totals in the table above exclude energy and carbon emissions from Scope 1 generator fuel as well as Scope 3 waste and Air & Rail travel to match the figures reported in last years SECR to enable a like for like comparison.

Keeping Industry Working™

2026 Environmental Social Governance Report

Contact us

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