

# Environmental Management Statement

## 1. How we work

Tuff<sup>1</sup> uses a structured Environmental Management System (EMS) that complies with **ISO 14001:2015**. This statement summarises the detailed, technical EMS documentation maintained by our Group headquarters in Stockholm. This setup ensures a consistent, sustainable approach across both Tuff Sweden and Tuff UK.

As a leadership consultancy, we look at the "life-cycle" of our services. This means we consider the environmental impact of everything from our digital setup and the suppliers we choose, through to how we deliver our training programmes around the world.

## 2. Our main focus areas

We have identified four key areas where we can make the most difference:

- **Business Travel:** Proactively managing the carbon impact of our international and domestic trips.
- **Digital Footprint:** Monitoring the energy used by our cloud services, virtual training, and home-working setups.
- **Choosing Suppliers:** Picking partners (for software, co-working spaces, and travel) who have their own proven carbon commitments.
- **Resource Use:** Staying a paperless, digital-first business to eliminate unnecessary waste and physical consumption.

## 3. Hitting our Carbon Reduction targets

Our EMS is the engine that drives our Carbon Reduction Plan (CRP). We have set our 2025 baseline at 4.56 tCO<sub>2</sub>e and are committed to a 50% absolute reduction by 2030. To make sure this happens, we have built-in checks:

- **Tracking:** We record our travel mileage and digital energy use every quarter.
- **Action:** We use "Rail-First" travel for all viable journeys and use "Green" filters when buying new software or services.
- **Staying Legal:** We stay up to date with UK, Swedish, and EU environmental laws to ensure we always do more than the bare minimum.

## 4. Shared Responsibility & Accountability

In line with our self-governing model, everyone at Tuff shares the responsibility for our environment. However, we keep clear lines of accountability:

- **Group Oversight:** The Board of Directors of Tuff Sweden oversees the EMS to ensure the entire Group stays on track.

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<sup>1</sup> For the purposes of this statement, Tuff Ledarskapsträning Stockholm AB ("Tuff Sweden") and Tuff Leadership Training UK Ltd ("Tuff UK") are together referred to as 'Tuff' or 'the Group'. Both entities work under a single Environmental Management System (EMS) designed to meet the highest standards required in both the UK and Sweden.

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- **UK Lead: Trevor Hudson** is the lead representative for Tuff UK. He is responsible for ensuring the system works on the ground in the UK and for conducting our annual reviews.
- **Speaking Up:** We use our internal "friction-checking" routines to catch any risks that could cause our work to drift away from our environmental promises.
- **The Whole Team:** Every consultant at Tuff is briefed on our environmental rules and expected to apply the "Travel with Purpose" logic, flying only when it is absolutely essential for the client's success.

## 5. Always improving

Our EMS isn't a document that sits on a shelf; it's a living process:

- **Annual Checks:** We conduct a comprehensive internal audit of our environmental performance in January.
- **Review:** The Board and Trevor Hudson review our Carbon Reduction progress each year. If we've missed a target, we figure out why and set new actions to get back on track.
- **Being Open:** We are happy to share our progress with our clients. We believe being a leadership company means being honest about our impact.

## 6. Documentation & Evidence

This statement is supported by a full suite of internal documentation, including our environmental risk register, legal register, and internal audit reports. These master records are managed by Tuff Sweden and are available for review upon request to demonstrate our ongoing compliance and commitment to environmental excellence.

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**Last Updated:** March 2026

**Approved by:** The Board of Tuff Sweden & Trevor Hudson (Tuff UK)