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TRITON POWER

TRITON POWER (TRITON) POLICY STATEMENTS

General Introduction

The policy statements contained in this document are owned by the Triton Board and form part of a suite of board-level policies designed to promote a healthy business culture and to guide decisions and actions, as expected by Triton's shareholders and other stakeholders. These policy statements are applicable to all entities, power assets and operations within the Triton Group.

Roles & Responsibilities

These policy statements apply to all Triton employees and workers. They are also relevant to people contracted to provide services to Triton through third parties.

The Triton Board is responsible for setting the overall strategic direction of these policy statements and reviewing performance of the Triton Group against the same. In decision making and the implementation of these policy statements, the Board is supported by Triton's Senior Management Team.

The Triton Senior Management Team is ultimately responsible for making sure that Triton employees at all levels and third parties contracted to provide services to Triton understand and comply with these policy statements.

Triton Managers are responsible for ensuring their direct reports and team members are made aware of these policy statements and for ensuring their own and their direct reports'/team members' compliance with the same.

All employees are expected to understand what the policy statements mean and to comply with them in the performance of their role. Employees at all levels must also ensure they comply with supporting policies, processes, procedures and controls as well as completing any relevant training.

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Governance

The Triton Board and Triton Senior Management Team are responsible for the oversight of these policy statements, including the approval of any changes to the same. These policy statements are reviewed annually as part of an evaluation process. Actions and decisions that do not align with the principles in this policy are reviewed and where appropriate opportunities for improvement are actioned.

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Anti-Corruption and Bribery

Policy Statement

Triton has a zero-tolerance approach to corruption, financial crime and criminality (including fraud), and the giving or receiving of bribes for any purposes. Triton will comply with all applicable anti-corruption laws and regulations and take active steps to ensure that corruption does not occur in relation to Triton's business activities.

Policy Purpose

This policy is intended to maintain Triton's established reputation of lawful and ethical behaviour and for financial integrity in all aspects of its business. It aims to minimise the business and personnel exposure to bribery, corruption and financial crime and maintain a culture where bribery or corruption is never acceptable.

Policy Commitments

Triton is committed to:

- Implementing policies, processes, procedures, controls and strategies to manage the risks and to comply with legal and regulatory obligations and reporting requirements relating to bribery and corruption as further set out in its Anti-Corruption and Bribery Policy, which includes its policy and procedures for determining the suitability of giving or offering hospitality and/or gifts of any kind.
- Promote the disclosure and management of potential conflicts of interest.
- Competing vigorously and fairly, and to give full consideration at all times to its obligations under UK laws. Triton takes a zero-tolerance approach to any competition law infringement.
- Comply with REMIT (EU Regulation on wholesale energy market integrity and transparency).

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Cyber Security

Policy Statement

Triton will comply with all regulatory requirements related to cyber security and will ensure everyone working for and on behalf of Triton, is aware of the relevant policies, processes, procedures and controls in place and the importance of taking personal responsibility for keeping information, systems and related assets safe and secure.

Policy Purpose

The purpose of the policy is to reflect upon the growing risk posed to Triton by cyber criminals and the increasing focus and rigor needed in this area to ensure Triton stays cyber secure and compliant with relevant regulations.

Policy Commitments

Triton is committed to:

- Ensuring that its systems, assets and people are safe and secure, and not put at risk via any weaknesses in our cyber security systems. Triton seeks to identify and mitigate cyber risks to its staff and systems.
- Interaction with third parties is managed to ensure that they understand their commitments to handle Triton's information and systems legally and protect it appropriately.
- Monitoring employees' use of systems and services to ensure they are being used securely and in accordance with relevant policies and procedures.
- Remaining vigilant to the threat of cyber-crime and the need to understand associated risks. To this end, Triton will:
 - o Take all reasonable steps to keep its information and systems secure including embedding appropriate controls within Triton's technologies, processes and behaviours.
 - o Apply different levels of controls based on the organisation's cyber risk appetite.
 - o Respond promptly to attempts of unauthorised access to Triton's information and systems and implement continuous improvements to prevent reoccurring attempts.
 - o Work continuously to improve its defence, and security controls, through internal and external audits, reviews, exercises and tests.
 - o Ensure security situational awareness and identify security threats and risks.
 - o Engage risk owners and relevant stakeholders in risk mitigation activities.
 - o Collaborate with internal and external networks of experts and react quickly to changing threats and threats landscape.
 - o Require its employees and hired contractors to comply with this Cyber Security Policy and offer appropriate awareness training and competence development plans.

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Employment

Policy Statement

Triton's policy is that all employers should provide a safe, engaging and inclusive working environment. Triton aims to provide such an environment and to contract with other like-minded organisations.

Policy Purpose

The purpose of this policy is to create an approach to employment standards which embeds inclusion and diversity and demonstrates learning opportunities, fostering a great place to work, where people feel valued for their contribution, can express their thoughts and ideas, raise concerns, ask questions and admit mistakes, all without fear of reprisal.

Policy Commitments

Triton is committed to ensuring:

- Triton applies robust processes to ensure that all staff are treated equally including areas such as sickness, absence, performance management and remuneration.
- All employees, contractors and temporary workers are treated, and treat each other, with fairness and respect.
- The management team set clear standards of ethical and moral conduct and procedures for dealing with behaviour or relationships which do not meet those standards or Triton's values with a clear commitment that bullying and harassment will not be tolerated.
- That Triton is seen as a great place to work, where all employees are engaged, motivated and proud to be part of the team.
- As a responsible employer, Triton rewards its employees fairly and, as a minimum, endeavours to meet the intent of UK initiatives such as those of the UK Living Wage Foundation, designed to ensure workers receive fair pay, a real living wage and are not subject to casual or insecure working practices.
- An inclusive workplace, which recognises the valuable contribution and individuality of its employees, particularly the wide range of knowledge and experience they bring.
- A greater appreciation of gender-based, belief-based, cultural and other differences existing across the workforce by growing self-awareness in order to create a truly inclusive workplace.
- Robust and inclusive processes are developed to ensure all employees are supported to join, progress and stay in rewarding roles within Triton, regardless of their individual differences.
- Employees' development is seen as an integral part of the strategic planning so that people can perform their jobs effectively and make maximum use of their talents, skills and abilities.

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- Investing in our employees and future talent because it's the right thing to do and because Triton is committed to owning and operating long-term assets, recognising and supporting such individuals with appropriate training and re-training opportunities as part of our approach to organisational change.
- Recognising our employees have commitments outside of the workplace and developing working practices and policies that support work-life balance.
- To have mechanisms in place to support respectful and constructive dialogue with the employees and their representatives and value their input.

Effectively operating and maintaining an appropriate whistle-blowing policy, process, procedures and controls to support employees with raising their concerns confidentially without fear of any recrimination or adverse impact.

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Environment

Policy Statement

Triton is committed to acting responsibly to protect the environment and supports the transition to Net Zero, adding long-term value not only for its stakeholders but for wider society.

Policy Purpose

The purpose of the policy is to ensure Triton's processes, procedures and controls are effectively designed, implemented and operated to enable the identification and mitigation of material environmental impacts, manage environmental risks and engage positively with key stakeholders to improve the environmental impact of its business activities in support of Net Zero.

Policy Commitments

Triton is committed to:

- Complying with all relevant legal and regulatory requirements and, where reasonable and appropriate to do so, seeking to go above and beyond this to meet additional relevant voluntary standards designed to bring about positive environmental change.
- Maintaining and continually improving its Environmental Management System certified to ISO 14001.
- Decreasing the impact of resource consumption where possible by:
 - o minimising resource use and waste production;
 - o minimising waste to landfill and increasing recycling;
 - o working with our contract partners to improve environmental performance; and
 - o exploring options to engage in the circular economy by, where reasonably practical, using reprocessed materials and selecting material that have sustainable life cycle impacts.
- Managing, protecting and enhancing the natural environment by:
 - o monitoring, as appropriate, the impact of Triton's operational activities located in sensitive environments and taking into account measures to reduce those impacts where practical; and
 - o exploring opportunities to support and/or collaborate with relevant organisations that protect and enhance bio-diversity.
- Identifying and assessing the environmental impacts, threats and opportunities of Triton's operations to ensure that objectives and targets are set with material environmental risks in mind.

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- Engaging as appropriate with its supply chain, to assess environmental aspects and impacts of the products and services they provide and to help inform Triton's decisions on who to contract with and what for.
- Integrate environmental improvements into both every day and long-term strategic decision making, balancing the long-term economic, social and environmental impacts of activities.
- Ensuring that employees, temporary workers, contract partners and visitors to Triton sites understand their responsibilities in delivering the objectives of this policy.
- Working to support the UK Government's commitment to Net Zero.

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Finance

Policy Statement

Triton operates within a clearly defined financial framework to fairly remunerate stakeholders while maintaining a sustainable level of dividend cover and a strong balance sheet, having regard to the impact of market volatility. Triton has a zero-tolerance approach towards corruption, financial crime and criminality (including fraud), and for giving or receiving of bribes for any purpose. Triton operates within both the letter and spirit of the applicable laws at all times.

Policy Purpose

The purpose of the Financial Policy is to maintain effective financial controls and governance, meet external and internal reporting requirements, manage business risk and apply discipline to investment transactions. It is also intended to maintain Triton's reputation of lawful and ethical behaviour and for financial integrity in all aspects of its business. This includes making timely and accurate returns which reflect the businesses fiscal obligation to government whilst, at the same time, recognising all legislative concessions and reliefs. Triton aims to minimise the business (including its directors' and employees') exposure to fraud, bribery, corruption and financial crime and maintain a culture where fraud, bribery, corruption and financial crime is never acceptable.

Policy Commitments

Triton is committed to:

- Minimising the risk of corruption by implementing policies, processes, procedures, controls and strategies to manage the risks and to comply with legal and regulatory obligations and reporting requirements relating to corruption. Corruption can include, but is not limited to, acts of financial crime, internal or external fraud, theft, bribery, facilitation payments, mis-reporting, deception, or misappropriation for this purpose.
- Ensuring financial crime is never acceptable within Triton's business and may include, but is not limited to, the following: fraud, financial sanctions (including but not limited to, all applicable trade controls, including sanctions and export control regulations), money laundering, bribery and corruption, terrorism financing, human trafficking and modern Slavery, Facilitating Tax Evasion, Market Abuse and REMIT.
- Having clear, unambiguous policies, processes, procedures and controls for all employees regarding the giving or receiving of hospitality and/or gifts, which can be perceived as a form of bribery, all offers of hospitality / gifts being recorded in line with the Triton Anti-Corruption and Bribery Policy.
- Promoting the disclosure and management of potential conflicts of interest.
- Only accepting and raising invoices and other contractual documents which are true to Triton's agreed commercial situation and which do not include false information.

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- Having zero tolerance in relation to any competition law infringement. Triton is committed to competing vigorously and fairly, and to giving full consideration at all times to its obligations under UK, and EU competition law.
- Complying with EU Regulation No.1227/2011 on wholesale energy market integrity and transparency (REMIT).
- Minimising its total tax liability within the framework of legislative reliefs, but does not take an aggressive stance in its interpretation of tax legislation. It is committed to paying its fair share of tax and does not help customers, suppliers, or anyone else to fraudulently underpay, or not pay taxes that are due and payable.
- Ensuring compliance with all applicable financial reporting, tax, corporate governance, regulatory and legal requirements.
- Managing its finances in accordance with the Delegations of Authority, maintaining an effective financial control and reporting framework and presenting relevant external and management information in a fair, balanced and understandable manner in order to meet the operational and strategic needs of the business.
- Ensuring that financial planning and analysis (including the annual budget process) and all planning, budgeting and monthly reporting requirements are effectively managed.

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General Human Rights and Modern Slavery

Policy Statement

Triton supports recognised international standards on human and labour rights and will comply with those relevant to its business activities. Triton seeks to conduct its business, with honesty, integrity, respect and openness and expects the same of its suppliers and contract partners.

Policy Purpose

The purpose of this policy is to outline Triton's approach to preventing and mitigating modern slavery and the risk of adverse impacts on human rights. Triton has a zero-tolerance approach to human rights abuses and modern slavery in all its forms. It recognises its responsibility for understanding the risks within its own business and supply chain and seeks to prevent or otherwise mitigate and manage such risks on an ongoing basis.

Policy Commitments

Triton is committed to:

- Upholding:
 - o the UN Guiding Principles on Business and Human Rights;
 - o the 10 Principles underpinning the UN Global Compact;
 - o the International Bill of Human Rights; and
 - o the obligations and commitments designed to uphold fundamental rights as set out by the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
- Ensuring zero tolerance of human rights abuses and modern slavery in all its forms in both its business and its supply chain.
- Complying with the Modern Slavery Act 2015 and all relevant human rights, human trafficking and modern slavery legislation as in force from time to time.
- Assessing its operations for and making enquiries of its supply chain to be able to assess the risk of modern slavery and human rights abuses and works to mitigate any such risks that may emerge.
- Providing a safe and secure workplace for all employees and contractors.
- Ensuring the right to work in the UK for all employees is evidenced in line with government requirements.
- Promoting personal development, fairness, dignity, and respect for all employees and those with whom Triton has business relationships. Triton actively seeks greater inclusion and diversity across its business and works to ensure its workplaces are free from discrimination, bullying and harassment.
- Paying a Fair Wage and offering flexible working (where appropriate) as a cornerstone of our approach to mitigating the risk of human rights abuse.

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- Having appropriate processes, procedures and controls in place to support the mitigation of the risk of human rights abuses and modern slavery within the supply chain.

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Health, Safety and Quality (HSQ)

Policy Statement

Triton is committed to the responsible management of health, safety and quality issues associated with its operations. It is committed to taking all reasonable steps to protect from foreseeable harm, its employees, customers, contractors, visitors and members of the public who may be affected by its activities. It aims to do this via the effective design and implementation of appropriate policies, processes, procedures, training and controls. Triton also recognises that wellbeing and human behaviour plays a significant role in creating a safe working environment for everyone and is committed to offering support and guidance to its employees, contractors, temporary workers and visitors as appropriate in this regard.

Policy Purpose

The purpose of this policy is to outline Triton's commitments to the prevention of injuries and ill health associated with its activities. This policy applies to employees, temporary workers, visitors and contractors. Triton is committed to a positive and open approach to HSQ, where everything will be done safely and responsibly or not at all. The Health, Safety, Environmental and Quality Policy is available to all interested parties.

Policy Commitments

Triton is committed to:

- Maintaining integrated health & safety and quality management systems to meet the requirements of International Standards ISO 45001 and ISO 9001 where applicable¹.
- As a minimum, comply with all relevant legal and regulatory requirements. However, Triton will also seek to go above and beyond basic compliance and meet additional relevant voluntary standards or best practices as deemed appropriate.
- Supporting its workforce via appropriate direction, training and supervision, to embed an everyday culture of safe working behaviours and practices, avoiding putting themselves or others at unnecessary risk.
- Take all reasonable steps to ensure only suitably qualified, trained and competent contractors are permitted to work on our sites and assets.
- Identifying, documenting, assessing and mitigating HSQ risks to an appropriate level.
- Ensure all employees, contractors, temporary workers and visitors understand their responsibilities in relation to the health and safety of themselves and others.
- Ensuring as appropriate, human factors are considered in the management of plant, process and organisational changes and that such changes are only made after risks to health and safety have been suitably assessed and mitigated.
- Ensuring effective workplace controls are put in place to ensure safe and healthy working conditions.

¹ Presently, Indian Queens is not certified to ISO 9001.

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- Maintaining accurate plant and process information to enable informed decisions.
- Developing, exercising and maintaining emergency plans.
- Providing appropriate resources to achieve the objectives of this policy and ensure that our workforce are sufficiently trained to conduct their work safely.
- Ensure effective communication of information on health, safety, and quality matters to all personnel who may be affected by our operations.
- Consult and participate with employees and workers' representatives on health, safety and quality matters.
- Set targets and regularly review health, safety, and quality objectives (including in regard to the Management Systems operated by Triton), to drive continuous improvement, aligned to risk profile and business objectives.
- Implementing processes to monitor and manage working hours of employees to mitigate any possible fatigue risks from excessive working.

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Privacy and Data Protection

Policy Statement

Triton is committed to protecting the privacy rights of our employees contractors and other individuals with whom it carries out its business activities. Triton will uphold privacy and data protection laws in order to protect the integrity and confidentiality of a person's personal data.

Policy Purpose

The purpose of this policy is to support Triton in meeting legal and regulatory requirements for data management, retention, and reporting, and managing data assets in line with data protection laws and regulations.

Policy Commitments

Triton will:

- Process personal data lawfully, fairly and in a transparent manner; and only for a specified, explicit and legitimate purpose or as required by law.
- Ensure that personal data collected should be adequate, relevant and not excessive in the relation to the purpose for which they are collected.
- Ensure appropriate information security relating to confidentiality, integrity and availability. Personal data will be retained only for the period that is required to serve the purpose for which the personal data is processed.
- Implement adequate safeguards in accordance with applicable law to protect data subjects' personal data which is processed by third party services providers, where such third party service providers process such personal data on behalf of Triton.
- Implement policies, processes, procedures and controls to comply with legal obligations under data protection laws.

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Procurement

Policy Statement

Triton is committed to maximising value throughout project lifecycles and competitively procuring goods, works and services as appropriate whilst acting in line with the wider policies to ensure an ethical and sustainable approach, whilst at all times complying with all relevant legal requirements.

Policy Purpose

The purpose of this policy is to establish processes, procedures and controls for the businesses' procurement of all goods, works and services and to ensure that all goods, works and services procured are value led, obtained competitively, in line with the required specifications and quality and procured in compliance with Triton's legal framework.

Policy Commitments

Triton is committed to:

- Having clear standards, processes, procedures and controls for procurement activities that support the delivery of its vision, values, purpose, strategy and wider policies.
- Ensuring contracts are awarded fairly, transparently and without discrimination and that all potential bidders are treated equally, with appropriate separation of duties and responsibilities.
- Undertaking reasonable and proportionate enquiries ('due diligence') into suppliers with the purpose of identifying, assessing and mitigating risks associated with entering into and maintaining a contract with them.
- Maintaining and complying with our 30-day undisputed payment terms and ensuring fair treatment of all suppliers, adopting an approach of providing suppliers with quick resolution of invoices and ensuring any queries or issues are managed effectively.
- Working within the authorised spend levels prescribed by the Triton shareholders and as set down in the Triton Delegations of Authority (including observing any requirements of the Triton shareholders in respect of their granting authority to spend an allocated budget).
- Undertaking regular and appropriate screening of Triton's suppliers and business partners to ensure full compliance with any new relevant sanctions.

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Sustainability

Policy Statement

Triton is committed to sustainable development, which, at a high level means “*meeting the needs of the present without compromising the ability of future generations to meet their own needs*”¹. Aligned to this commitment Triton aims to play its part in delivering the relevant UN Global Goals for Sustainability which seek to address social progress, economic wellbeing and protect the environment. Triton sees its core role as supporting the UK in a just and fair transition to net zero by providing energy and essential grid stability services needed by the UK energy system today, whilst working to ensure we invest in the people and technologies needed to provide the energy and system needs of the future. This is supported by our Decarbonisation Plan, which is reviewed annually and updated according to identified actual and emerging social, economic and environmental changes, to ensure it is keeping pace with relevant sustainability and other developments.

Policy Purpose

Meeting the needs of the present

Triton is committed to supporting the UK’s energy system security: providing electricity to keep the lights on when other intermittent technologies are unavailable; and system inertia via zero-emission technologies when those other intermittent technologies are the dominant generation type. Triton supports its neighbouring chemicals businesses with their essential energy (both steam and power) demands and is committed to doing so moving forward.

Aligning to the Sustainable Development Goals (SDG)

Sustainable Development Goal (SDG)		Triton related Commitment
3.	Good Health and wellbeing	<p>Triton recognises this is essential to sustainable development and is committed to providing guidance and support to all staff in relation to health and wellbeing, both physical and mental.</p> <p>SDG Target 3.5 specifically focuses on strengthening the prevention and treatment of substance abuse. Triton is committed to supporting this through its existing Alcohol & Drugs policies, processes & procedures, including its random drug & alcohol screening. It is further committed to ensuring that any employee who openly recognises they have an abuse problem are appropriately supported.</p>
4.	Quality Education	Triton acknowledges inclusive and quality education is a powerful and proven vehicle for sustainable development. It further recognises the importance of

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Sustainable Development Goal (SDG)		Triton related Commitment
		<p>reducing the skills shortage across the sector and communities in which it operates and investing in the workforce of the future.</p> <p>It is committed to working with local educational and other institutions to bring on future talent, removing barriers to entry based on age, gender, sexual orientation, ethnicity or background.</p>
5. 10.	Gender Equality & Reduced Inequalities	Triton is committed to ensuring equal opportunities to all personnel, including, in alignment with specific SDG Targets 5.1 and 10.2 respectively, ending all forms of discrimination against women and girls and empowering and promoting the social, economic and political inclusion of all irrespective of age, gender, sexual orientation, ethnicity or background. Triton is committed to supporting these targets through its inherent culture of inclusivity, its equal opportunities and recruitment policies, processes, procedures and controls and aims to be representative of the socio-economic environments within which it operates.
7. 9. 13.	Affordable and Clean Energy Industry, innovation and infrastructure Climate Action	Triton is committed to investing in cleaner energy infrastructure and clean technologies, to ensure Triton can provide its core service with reduced carbon intensity in the future. It is committed to investing in the workforce of the future through its collaborations and arrangements with educational facilities and other organisations within the communities it operates.
8.	Decent Work and Economic Growth	<p>Triton is committed to:</p> <ul style="list-style-type: none"> - supporting UK GDP growth, focusing on achieving higher levels of productivity, technological upgrade and innovation, whilst providing a suitable working environment for its employees. This includes equal pay for work of equal value underpinned by meeting the National Living Wage; and the implementation of employment policy, human rights and modern slavery commitments; and - protecting labour rights and promoting safe and secure working environments for Triton's workers and where appropriate ensuring this is a shared commitment through the direct supplier base.
12	Responsible consumption and production	Triton activities fall under the UK environmental Permitting regulations which aims at ensuring responsible consumption and production, and Triton seek continual improvement in this area.

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Decision making and materiality

Triton is committed to ensuring that the actions and decisions associated with its business are sustainable, balancing the long-term economic, social and environmental impacts of its activities. This is achieved by embedding sustainability into strategic decision making, with governance that ensures deliberate and regular assessment of sustainability risks and opportunities. Triton will apply double materiality when determining the relevance and significance of sustainability related issues to its business. This means it considers issues which have a financial impact on the business, as well as the impacts its business activities have on stakeholders and the wider environment.