Ethical & Environmental Policy



Summary

When running a business, profit and success can easily distract aims and targets while more important aspects such as honesty and integrity get forgotten. At Freethought we want to respond differently and make ethical decisions about how our business is run, this means being kind to our customers, our environment, and to society as a whole.

Ethical consideration reaches into every facet of our business from pricing our products, terms and conditions, analytics and tracking, marketing and advertising, employees pay and conditions, sourcing hardware, our supply chain, taxation, packaging, and waste. This policy sets out to identify how we meet our ethical values in the core areas we feel are important ahead of profit.

Clear pricing

We believe that pricing should be clear and transparent for our customers. In this industry it is very common for pricing to not include extras such as VAT, administration fees, set up costs, and other hidden extras. This approach is misleading and can falsely lead a consumer to believe they are getting a better deal than they actually are. Freethought wants to release our customers from this worry, so the price on our website is the price you pay.

No asterisks*

No asterisks are used when you receive a quotation or buy services from us. All the information you need is clearly provided and we promise to never use an asterisk to falsely represent what we are providing you. Honesty is fundamental to what we do so there are no asterisks, no hidden costs, no additional terms or conditions, or deals that are not as good as we say they are. We will not tell you one thing and give you another hidden away in small print subject to the *, this industry standard is something we are proud to abandon.

Analytics and tracking

We believe that people should be able to use the internet without their every move being tracked by social media and search companies. However, we also recognise the need to utilise those tools in order to allow our company to grow and better position our products and services. We are committed to using website analytics in the least invasive way possible and with as little personal information available to us as possible, utilising only the data we need to ensure optimal search performance and site performance.

We promise to respect the right to privacy and will honour opt outs and request to not track.

Responsible marketing

Freethought is committed to engaging in responsible advertising that doesn't promote harm in any form. We don't find advertising an effective tool to drive our sales but where we do take out advertising we take every reasonable measure to ensure that our advertisements do not appear alongside content that we consider unethical, such as news articles or publications promoting hate or discrimination, or on websites that promote drugs, weapons, pornography, tobacco, or anything that is counter to our values. When we are made aware, we are committed to pulling advertising that does not meet with our ethical standing immediately.

Carbon neutral

Electricity usage is an unavoidable part of operating a network of our size due to the number of servers and data centre locations we have. We are not oblivious to the impact this energy has on our environment though and we have committed to do everything we can to minimise the impact our operations have.

When we build servers and deploy products and services we will always opt for low power consumption hardware wherever the application allows for it, and we always opt for the most efficient power supplies available for a product we're purchasing. This makes sense not only in reducing our environmental impact, but also in providing savings that can be redirected to further developing our business.

When selecting our data centre partners, the source of their energy is top of our list of questions, we need to know that the power they source is green. Where the power is not sourced from renewable energy and they are unwilling to change their policy, we will place additional resources into engaging with a certified carbon neutral scheme to offset the carbon emissions of these operations.

In addition to emissions relating to our business energy consumption, we are also committed to measuring waste produced, travel we engage in, packaging and ingredients of promotional items to ensure that our consumption is offset and compensated.

Our goal and commitment is to ensure that all products and services provided by us are verifiably carbon neutral.

Charitable giving

Charities do amazing things in our communities and we want to support their work. Freethought will give a discount to any registered charity anywhere in the world, and in some cases upon getting to know a charity (particularly those in areas local to us) we will extend that support to provide completely free services, promotion to our customers, donation of our time to provide support in areas we specialise, or even direct financial donation.

More information can be found at <u>https://www.freethought-internet.co.uk/charities</u>

Electronic waste

It is inevitable that electronic equipment such as servers will eventually reach the end of their useful production life because newer equipment is more powerful, perhaps more efficient, or more suited to a particular task.

Whenever we dispose of hardware we will endeavour wherever possible to stop it entering the waste stream and will try to sell it on or donate to charities or social enterprises. Whilst our retired servers are no longer useful for us, they are potentially useful to a smaller company, or someone with a less demanding application. Where we are unable to dispose of our equipment by giving it a new lease of life, we will dispose of it with a properly licensed electronic waste recycling company.

Another way that we like to minimise electronic waste is by using refurbished equipment wherever possible. When we are looking to buy new network equipment, servers, or anything else right down to the paperclip we will wherever possible reuse, buy second hand, or buy refurbished items. This approach is saving us money as well as providing a second lease of life to items that might otherwise have ended up in landfill.

General waste

Almost all of what we do is electronic so we are not producing reams of paper and printed materials and producing little other general waste. However, when purchasing equipment we have to dispose of the packaging that the equipment is delivered in.

We commit to recycling 100% of the recyclable waste that we produce each year and will attempt to reduce wherever possible the amount of non-recyclable waste that we use or produce. We also are committed to the use of recyclable and sustainable packaging materials over non-recyclable packaging materials such as plastic bubble wrap when generating waste through transportation of hardware and other products.

Supply chain management

We source hardware from a multitude of manufacturers who all manufacture their products within very large and complex supply chains featuring multiple stakeholders and partners. This can make things very difficult to work out where equipment is being manufactured and ultimately who is responsible.

To try and keep things simple we operate an approved supplier list, which is also part of ISO 9001 compliance, this means that we can keep our pool of suppliers small and ensure as far as possible that they have the correct policies in place in order to keep the supply chain ethical.

Manufacturers and suppliers that do not meet our ethical values and international laws regarding forced labour, fair living wage, excessive working weeks (more than 48 hours), child labour of any kind, and discrimination based on race, gender, sexual orientation, nationality, etc will be immediately removed from our approved supplier list and no longer used.

Our most common suppliers of hardware, components, or services are; SuperMicro, Dell, HPE, Arista, Intel, Broadcom, Samsung, Seagate, Western Digital, Microsoft, and Apple.

Fair tax

We are committed to having an uncomplicated and fair approach to taxation, we recognise the importance of our role within society and it's right for society to benefit from our successes through appropriate taxation of our profit. We do not engage in any tax avoidance schemes as defined by HMRC and will always pay the taxes that we owe in the countries that we operate in.

We operate with honesty and there are taxes that apply to us that we do not agree with, the so called "fibre tax" being the main example. Heavy taxes on fibre optic cables hinder innovation and prevent the roll out of high speed internet access in the UK. We strongly condemn the existence of such a tax as it ultimately harms the consumer by making fibre based products more expensive, or simply not viable. In the case of rural areas that could benefit significantly from the provision of high speed internet this is a particularly hot issue. We do not condemn the fibre tax on the grounds of reducing our tax bill, but rather because it directly impacts the consumer, especially those rural consumers who stand to benefit the most if the tax were reduced or removed.

Worker rights

Freethought's directors have all worked in large corporations and know firsthand what it can be like working for a company that doesn't care for it's employees. We understand that our success depends on our employees and we operate and provide policy to ensure that working for Freethought is a positive experience where employees have a voice.

Our policies condemn any work place intimidation, forced labour, pressure to work overtime, excessive working hours (i.e. greater than 48 in a week), discrimination of any kind for any reason including but not limited to; gender, sexual orientation, race, nationality, political views, or religion.

Freethought is committed to creating a positive work environment where employees are valued, enjoy their job, develop as individuals, and most importantly are paid fairly. Work life balance is also an important factor for all our employees and we want employees to enjoy their life outside of work without work being a pressure or at the expense of family. As a family run business we encourage and facilitate employees taking the time they need to support their families, be it flexibility around child care, paid time off to attend school or health appointments, or flexi-leave to enable them to work hours that will enable them to achieve this as far as our business allows.

We provide a generous holiday allowance with a policy of minimum annual leave that all employees must take. In addition they are also able to request an unlimited amount of additional time off.

Politics

We are not a member of any formal lobbying organisation, nor are we a member of any political party or support any political party.

We do provide hosting services and other services to government organisations, and political organisations and individuals, however we supply those services on the same terms as any other customer and our provision of services is not an endorsement of that organisation or person.

We are a member of some industry organisations such as Nominet, LINX, and LONAP - our membership of these organisations is primarily a technical one rather than organisational. For example we are an accredited channel partner of Nominet because we need to sell UK domain names. We are members of LINX and LONAP because we wish to use their peering networks to connect to other network operators in order to carry network traffic for our mutual customers. These organisations do on occasion use their not insignificant industry influence to express opinions positive or negative around political topics, for example to fight for better privacy provisions in investigatory powers legislation, the so called "Snoopers Charter"

In addition to our membership of these organisations we will also express political opinions on occasion around topics of significance for our industry, especially topics around consumer privacy. We view the introduction of over-reaching investigatory powers legislations ("Snoopers Charter") as an ethical stance because government will often attempt to mislead the population into thinking something is necessary when in fact the reality the average consumer understands is quite different and an ulterior motive exists. We also take a stance supporting ethical issues such as equality, anti-discrimination legislation, etc these are political in nature but we want to fight for a more ethical outcome.

Fair trade, palm oil, and sustainable cocoa.

We often send out promotional bespoke chocolate manufactured specially for us by Choc Affair in York. Choc Affair (<u>www.choc-affair.com</u>) hand make our chocolates in York and work directly with a cocoa growing co-operative in the Huilia region of Columbia with whom they have a long term personal relationship. Choc Affair are passionate about being as ethical as possible, they want to ensure their cocoa is sustainably sourced, is palm oil free, and made with 100% natural ingredients.

Choc Affair also actively seek to employ people who may struggle to gain experience and employment elsewhere, and share their profits with vulnerable children and communities in Uganda.

Where we send out gifts and promotional items that are not our usual bespoke chocolate from Choc Affair we will always ensure it is at a bare minimum certified to a recognised and respected fair trade standard.

Wherever possible office drinks, food, and other refreshments are fair trade and ethical.