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1. ESG Policy Statement

This ESG Policy Statement is produced by the Directors of Esland (“the Company”) pursuant to its ESG strategy.

The ESG policy of the company is to ensure so far as it is applicable and reasonably practicable that its operations will be carried out with a commitment to:

- (a) Protecting and enhancing the environment by minimising negative impact and maximising positive impact on the environment;
- (b) Ensuring appropriate conduct towards, positive impact on and good relationships with employees, clients, suppliers, and the community in which it operations; and
- (c) Conducting its business with integrity and high standards of business ethics, through appropriate structures, systems, processes, and procedures.

Fulfilling the Company’s ESG Commitment is a fundamental principle of the Company’s business and is the responsibility of the Directors of the Company.

2. General ESG Principles

In fulfilling its ESG Commitment, the Company seeks to:

- (a) Comply with all applicable local and national laws, rules, regulations, and other measures having the force of law that are relevant to any aspects of its ESG Commitment; and
- (b) Where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of its ESG Commitment which are higher than the standards imposed by law.

All Company employees must, in carrying out their duties, adhere to the principles and objectives of this ESG Policy Statement. Training will be given to employees to ensure that they are familiar with, and work in accordance with, this ESG Policy Statement.

The Company expects suppliers of goods and services to the Company and contractors working for the Company and their suppliers and sub-contractors to comply with the Company's Supplier Code of Conduct.

3. Environmental

The Company has produced the following objectives as a framework for the introduction of practices to implement the environmental aspects of its ESG Commitment:

- (a) Measuring, and acting to reduce the carbon footprint of business activities;
- (b) Mitigation of potential environmental challenges, including in how it identifies and manages environmental risks and hazards;
- (c) Integration and promotion of environmentally friendly technologies, materials, and procurement;
- (d) Ensuring procurement and maintenance of all relevant environmental permits and licences for any relevant operations and to handle waste and chemicals properly, safely and in accordance with the relevant law;
- (e) Commitment to carry out and complete environmental audits when required;
- (f) Focus on action to conserve resources and energy, to minimise emissions to air, water, and land and to increase recycling rates and circular economy principles;
- (g) Promoting a culture of environmental awareness amongst employees, providing training as appropriate to enable them to carry out their job functions in a manner that shows care for the environment;
- (h) Undertaking initiatives to promote environmental and sustainable principles across the Company, with stakeholders, and the wider community in which it operates;
- (i) Give due consideration to environmental issues and energy performance in the acquisition, maintenance or refurbishment of existing buildings, and the design and location of new buildings;
- (j) Take steps to improve environmental efficiency of transport and business travel, including considering whether, to avoid travelling, any meetings can be held remotely;
- (k) Swiftly respond to accidents or incidents that have a potential to threaten the environment, including reporting details of an environmental accident or incident at work to Steve Jeffers, Chief People Officer and Rachael Allen, Chief Operating Officer so that they can investigate and take prompt action to make good and avoid recurrence.

4. Social

The Company has produced the following objectives as a framework for the introduction of practices to implement the social aspects of the ESG Commitment:

- (a) Prohibiting any infringement of civil or human rights by the Company, its officers and employees, and by those in its goods and services supply chains. In particular, by prohibiting any participation in or connection with any modern slavery, child labour or human trafficking as per the Company's Modern Slavery Statement;
- (b) Avoidance of investment in or any other connection to industries with a negative social impact;
- (c) Prohibiting any bribery or corruption of, or by, any of its officers or employees as per the Company's Anti Bribery and Corruption Policy;
- (d) Prohibiting any money laundering by any of its officers or employees;
- (e) Encouraging ethical behaviour and decision making within the Company and amongst its supply chain;
- (f) Ensuring compliance by the Company with workplace health and safety laws and standards, and mitigating risks to health and safety in the workplace;
- (g) Maintaining suitable privacy and data security in respect of all stakeholders of the Company;
- (h) Maintaining an inclusive and collaborative workplace where the wellbeing of employees is a high priority;
- (i) Promotion of diversity, equality, inclusion and belonging amongst the Company's workforce;
- (j) Providing and maintaining a working environment free from all forms of discrimination, harassment, and bullying under any circumstances, for example gender, gender identity or expression, race, colour, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital status, or sexual preference;
- (k) Pursuing a fair and competitive approach to remuneration, working hours and attendance, leave, sick leave and other aspects of wellbeing;
- (l) Providing subsidised employee benefits, including health club/gym membership, private medical and employee assistance programme;
- (m) Supporting the local community by employing locally where appropriate;
- (n) Making positive contributions to the local community, local charities, and worthy causes in line with the Company's ESG Strategy;
- (o) Aiming to promote and hold wellbeing, charitable and social activities in each year;
- (p) Encouraging employees to participate in and contribute to activities which benefit the welfare of members/sections of the local community, allowing volunteering for employees where circumstances permit;
- (q) Encouraging employees to participate in appropriate further education and training which supports their professional development, allowing paid time-off where circumstances permit, including any education or training that the Company itself is able to provide in-house;
- (r) Providing sponsorship for initiatives or events run by or benefiting local charities or other local worthy causes in line with the Company's ESG strategy;
- (s) Encouraging employees to nominate local charities and other local worthy causes to Sophie Bennington, ESG & Sustainability Manager, for participation by the Company and its employees and/or for donation by the Company;

- (t) Conducting employee satisfaction surveys;
- (u) Ensuring that the Company's services meet all relevant standards of safety and quality;
- (v) Engaging local suppliers and/or social enterprise partnerships where appropriate;
- (w) Paying the Company's suppliers properly and on time.

5. Governance

The Company has produced the following objectives as a framework for the introduction of practices to implement the governance aspects of the ESG Commitment:

- (a) Ensuring that the Company complies with, at least, all applicable local and national laws and regulations, relevant standards and codes of practice relating both generally and in particular to transparency and corporate governance;
- (b) Establishing clear and effective governance for ESG, promoting the use of best practice on corporate governance when relevant and possible, and setting goals and establishing accountability through the Company's ESG committee and reports to its board;
- (c) Ensuring that the Company promotes strong oversight and transparency at all levels of its organization;
- (d) Adopting and maintaining suitable and clear governance structures, including terms of reference for the board that, amongst other matters, set out the required composition of the board, its powers, and responsibilities;
- (e) Appointing and maintaining an ESG committee and adopting and maintaining suitable and clear terms of reference for that committee;
- (f) Ensuring that the Company maintains exemplary board stewardship and management accountability;
- (g) Ensuring that the Company adopts and implements adequate internal controls, processes, procedures, and proactive risk management;
- (h) The Company is committed to establishing and maintaining high standards of business ethics through a strong code of ethics and business conduct, ongoing ethics training and promotion of a culture of integrity, honesty, ethical and responsible conduct in its business activities and behaviours;
- (i) The Company is committed to ensuring that no corruption, bribery, money laundering or internal misconduct activities are taking place in the business;
- (j) Establishing and maintaining detailed policies covering anti-bribery and corruption, code/s of conduct, conflicts of interest, privacy, and human resources, as part of the governance structure of the Company;
- (k) Engaging with stakeholders regularly about ESG issues;
- (l) Ensuring that the Company cultivates strong stakeholder relationships through transparency, open communications and responding to stakeholder input on any issues including] ESG issues;
- (m) Dealing with regulators, tax authorities and auditors and other relevant stakeholders in an open and co-operative manner;
- (n) Ensuring the resilience and long-term preservation of value for the Company's business;
- (o) Ensuring that the Company mitigates risk exposure and builds the resilience of its business to climate change mitigation;

6. Measuring and reporting compliance

The Directors will adopt and implement (and vary from time to time as they deem necessary) detailed clear written requirements for the Company to monitor and report on the Company's compliance with this ESG Policy Statement, including:

- (a) metrics and methods for measurement, by the Company, of compliance sufficient to show trends over time and progress against established objectives and targets; and
- (b) requirements as to reporting to stakeholders at regular intervals not exceeding 12 months on the information derived from that measurement and on disclosures on ESG issues.

7. Status of this ESG Policy statement

The Directors and Senior Management Team endorse this ESG Policy Statement and are fully committed to its implementation.

This ESG Policy Statement will be regularly reviewed and updated as necessary.