



Environmental, Social and Governance (ESG) Policy

We recognise the importance of our role in managing social, economic and environmental issues. ESG is the principal way Whistl seeks to coordinate and manage practices to maximise positive social and economic contributions and minimise the environmental impacts of its business.

Objective

We aim to be a leader in responsible business. Our objective is to ensure sustainable products and services and to generate sustainable economic value. We employ robust governance and management processes to drive our performance in an ethical way. We commit to a high standard of external disclosure of our performance and use CDP Worldwide, EcoVadis and our Whistl Annual Reporting to achieve this.

Scope

This policy applies to all employees and divisions of Whistl, including agency workers, contractors and subcontractors.

This policy sets out Whistl's commitment and approach to responsible business, managing our impacts on, and relationships with:

- our customers & value chain: where we trade and how we trade
- our people: where we work, how we work and who we work with
- the environment: how we reduce our impact on the world's ecosystem and natural resources
- our communities: how we support the community and world at large

We will achieve this by:

- 1.1. Engaging with key stakeholders including clients, employees & temporary workers, community, environmental stakeholders, regulators, business partners, suppliers and our shareholders to drive improvement
- 1.2. Utilising our internal management systems to determine, monitor, maintain and continually improve our performance, governance, risk management, reporting and productivity
- 1.3. Driving responsible behaviours throughout our organization by setting clear standards and goals for improvement
- 1.4. Operating in accordance with the values and standards of behaviour set out in Whistl's Policies. We will adhere to all applicable laws and regulatory requirements, and provide a mechanism and process whereby illegal and/or unethical behaviour can be reported and addressed
- 1.5. Continually improving the scores obtained for the completion of annual disclosures (CDP / EcoVadis) by addressing actions and driving improvements of Whistl's practices internally and through the engagement of our supply chain; including Ethical behaviour, Sustainable Procurement, Labour Practices and the Environment

In particular:

Roles & Responsibilities

- 2.1. The Executive Board is accountable for ESG at Whistl. The coordination of ESG initiatives and activities will be owned on the Board's behalf by the nominated Board member who will report regularly on ESG status, progress and issues to the Board
- 2.2. The Board are responsible for sponsoring and setting principles, charters and codes of conduct to support ESG initiatives and activities



- 2.3. The Board will encourage participation from the workforce to support ESG initiatives, such as raising money for Whistl nominated charities and requesting volunteers to become local Champions supporting Whistl's ED&I Charter
- 2.4. All managers are responsible for ensuring that key strategic and operational decisions in their area take into account ESG considerations, supporting ESG practices through role-modelling, the allocation of sufficient resources, raising the profile of ESG and overseeing that their area complies with this policy
- 2.5. Staff are accountable for behaving in a responsible and ethical way, adhering to this policy and enabling Whistl to make a positive social, economic and environmental contribution

Our Customers & Value Chain

- 3.1. We will provide products and services that meet the needs of our clients, while having consideration for the impact on the natural environmental and communities in which we operate
- 3.2. We will provide high standards of service to clients, and utilise complaints procedures which ensure that any concerns are effectively addressed
- 3.3. We will use our position in the marketplace to raise awareness of ESG with clients and the market, and help facilitate change to minimise impact on the natural environment and communities where we operate
- 3.4. We will support our clients to realise the environmental impact we have on their supply chain when requested by disclosing ESG performance information and data
- 3.5. We will ensure that our key suppliers are willing to comply with our Supplier Code of Conduct, which includes the key principles & behaviours to support Whistl's Ethical, Environmental, Procurement and policies that relate to Labour & Human Rights Policies

Our People

- 4.1. We will provide a workplace in which diversity is valued, inclusion is promoted and where there are equal opportunities. We will provide a mechanism by which employees can raise their views and be engaged in change and issues that affect the company
- 4.2. We will provide and strive to maintain a clean, safe and secure work environment which is conducive to the health and welfare of our people. We will play our part in helping prevent any incident of modern slavery or human trafficking in our business and supply chain
- 4.3. We will support our people with learning and development opportunities to help them reach their potential and maximise their contribution
- 4.4. We will recognise and reward our people on the basis of their own performance and that of the company
- 4.5. We will adopt practices which support campaigns such as ED&I, The Valuable 500, Disability Confident and Race at Work Charter
- 4.6. We commit to working to continuously improve our people related policies and processes in line with the Investors in People framework

The Environment

- 5.1. We will seek to minimise carbon emissions and energy, water and paper usage through design, infrastructure and behaviour, and by fostering and encouraging initiatives that reduce waste
- 5.2. We will seek to optimise the recycling of waste through providing adequate facilities and encouraging the right behaviours
- 5.3. We will seek to reduce unnecessary travel and encourage the use of alternative means of communication where practicable
- 5.4. We will incorporate environmental considerations into procurement decisions (including refurbishments / new building projects) and raise awareness / influence in our supply chain to facilitate a reduction in their environmental impact
- 5.5. Will we work with Industry-led initiatives to support Supply Chain ambitions on the Road to Net Zero

- 5.6 We support the recommendations of the Taskforce on Climate-related Disclosure (TCFD) and engage with our stakeholders and encourage enhanced disclosure on climate change.

Our Communities

- 6.1. We will provide benefit to the community through the creation of jobs and the accompanying wealth produced
- 6.2. We will support UK-wide employee volunteering opportunities and corporate fundraising campaigns via location-based nominated charities
- 6.3. We will encourage and support employees in their own community activities and fundraising efforts through the provision of time
- 6.4. We will encourage employee giving by providing a JustGiving (Give As You Earn) facility to further support a charity that is personal to an individual
- 6.5. We will act in a responsible and ethical manner within the communities where we conduct our operations, to ensure that we reduce our impact, and minimise concern within those local areas

Reporting, targets & objectives

- 7.1. **Internal ESG reporting** (diversity, H&S, productivity and environmental): we are committed to clear measurement and monitoring of our ESG in order to drive improvement
- 7.2. **External disclosure:** we aim to be leader in responsible business by benchmarking our internal ESG frameworks (governance, risk management and performance) against the industry average via CDP and EcoVadis
- 7.3. **Environmental and energy targets and objectives:** we will utilise our ISO 14001 and 50001 Management Systems to define, measure, review and improve our performance by setting clear targets and objectives
- 7.4. **Compliance:** our reporting standards comply with Streamlined Energy & Carbon Reporting requirements (SECR)
- 7.5. **Investors in People:** we will commit to maintaining and improving our IIP accreditation through ongoing action and independent reassessment of achieving success through our people and their development

Reference Materials & Further Information

Health & Safety Policy

Environmental Policy

Energy Policy

Procurement Policy

Labour & Human Right Policies include:

- Modern Slavery Policy
- Learning and Development Policy
- Equal Opportunities and Diversity Policy
- Conduct and Capability Policy
- Ethical Conduct and Bribery Act Policy



Nigel Polglass
COO, Whistl UK Ltd
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