

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)

Introduction

Environmental, Social and Governance (ESG) is a framework for assessing how organisations and companies manage their operations and impact across three key areas:

Environmental: Sustainability practices, including climate impact, resource conservation, and waste management.

Social: How an organisation engages with its employees, communities, supply chain(s) and broader society, encompassing aspects like diversity and inclusion, education and training, wellbeing, and human rights.

Governance: Structure and integrity of an organisation's leadership, addressing areas such as board composition, due diligence, transparency, and ethical standards.

This ESG policy outlines how Oakray Limited plans to address environmental, social, and governance issues and meet its ESG goals.

Purpose

This policy highlights our approach to integrating ESG across our activities and aims to encourage the organisation to better understand ESG in the context of the business. The policy has been agreed by senior management and will be reviewed annually or if amendments are necessary to be made.

Oakray's Managing Director has overall responsibility for the effective operation and implementation of this policy. Day to day responsibility for this policy lays with Line Managers and any suggestions for change should be made to the Senior Management Team.

Any questions about this policy should be directed in the first instance to your line manager.

This policy applies to all employees, both full and part time, including directors and senior management.

ESG Commitment

Oakray Limited is committed to integrating ESG factors into its own corporate operations, focusing on the matters important to our employees and investors.

We will promote responsibility for the environment, social factors and governance issues within the organisation and communicate and implement this policy at all levels of the workforce.



We believe that business leadership should be open to anyone with the necessary abilities, regardless of their socioeconomic background or personal characteristics.

Our senior leadership team will deliver good governance and ensure a robust governance framework is in place in order to promote accountability, effective decision making and sustain the trust of our stakeholders.

We acknowledge that our company has potential impacts on people and the environment through our operations and supply chains. Through this policy we:

- Commit to comply with applicable law in all our operations.
- Commit to protect human rights. We are a committed equal opportunity employer and will abide by all fair labour practices. We will ensure that our activities do not directly or indirectly violate human rights
- Commit to minimise our impact on our environment and maximise the effective use of resources.
- Commit to foster responsible environmental behaviour amongst staff at all levels.

ESG Committee

Oakray Limited has an ESG Committee, tasked with driving forward our sustainability goals and targets. This comprises of the Managing Director, Business Services Director, Head of Business Development and Bids and the Head of HSQE. The ESG Committee meets bi-annually to review progress.

ESG factors relevant to our business:

Environmental	Social	Governance
Net Zero	Diversity, inclusion, equality	Corporate governance
Air pollution	Human rights and modern slavery	Risk management
Renewable energy	Health, safety and wellbeing	Conflicts of interest
Waste management	Employee relations	Transparency (including financial and operational reporting)
Energy management and efficiency, including water	Customer privacy and security	Fraud, anti-bribery, anti-corruption controls
Land use	Product safety and quality	Compliance
New building developments		Due diligence

Environmental

Our board members and senior executives will assess whether they have the skills, knowledge and commitment to oversee the transition of Oakray Limited to Net Zero.

Where capabilities are deemed to be lacking, the company will seek to remedy the situation through training initiatives or changes to board composition.

Our current impact on the environment and climate change will be assessed and publicly reported on. We will not make any unjustified, misleading or inconsistent claims regarding our 'green credentials' in any marketing activities or corporate reporting.

Risks and opportunities posed by climate change to the business and its operations will be evaluated, and the assessment reported to stakeholders via our annual report. We will utilise a recognised reporting framework for this purpose.

We will provide information to all stakeholders about the environmental impact of our services in order to facilitate informed consumer purchasing and decision making.

Oakray Limited will invest in renewable energy sources for its estate where possible and where it successfully obtains approval from the freeholder.

We will:

- comply with all laws governing the environment.
- strive to better understand both the direct and indirect impact that our practices may have on the environment.
- minimise or offset our impact on the environment
- work towards the conservation of energy, water and resources in all our operations.
- dispose of waste thoughtfully, and follow the waste hierarchy of 'Avoid, Reduce, Reuse, Recycle'.
- lessen our environmental impact by purchasing environmentally friendly products and services.
- take steps to continually improve environmental performance.
- protect and support biodiversity.
- be an environmentally responsible neighbour in our community.
- promote environmental awareness throughout all operations of the company.
- foster a sustainably aware culture, where responsibility is assigned and understood.

Social

Oakray Limited will ensure gender balance on our board of directors and in senior management positions.

Oakray Limited aims to increase the ethnic diversity of our board and senior management in order to better reflect the ethnic diversity of the societies/markets/communities in which we operate.

Oakray Limited will evaluate how we measure and monitor overall levels of inclusiveness and diversity within the organisation. We will consider to what extent we

are providing a fair and equal chance of career progression to employees of all backgrounds and personal characteristics.

Oakray Limited will embrace health, safety and wellbeing as a priority of our ESG strategies, recognising their importance in creating a resilient, productive and healthy workforce. Initiatives in this area will include creating reporting frameworks on incidents relating to worker health and safety, offering educational assistance to the workforce such as support for external training courses, and retraining and reskilling programmes for those returning to work after a period of absence. We will align safety, health and wellbeing targets with government commitments; tracking and reporting on employee take-up of wellbeing benefits and participation in organisational wellbeing initiatives and policies; identifying, developing and reporting on design and operation strategies linking physical workplace to employee wellbeing.

We will:

- respect the dignity of all employees and value the contribution they make in the workplace
- commit to provide equality and diversity in line with the Equality Act 2010 and to eliminate discrimination in the workplace
- comply with legislation such as the Modern Slavery Act 2015 and Bribery Act 2010.
- commit to the Public Services (Social Value) Act 2012
- encourage our employees to volunteer via programs organised internally or externally
- provide a safe and healthy workplace
- supporting the surrounding community by looking to employ local people where possible
- support local and small businesses
- support local charities by donating time e.g., staff participation in volunteering days.
- look to provide sponsorship or monetary donations to local charities, sports clubs, societies, youth groups, community centres, etc.
- promote long-term economic benefits within communities.

Governance

We are committed to achieving our business objectives in an honest, transparent and accountable way and endeavour to sustain a culture of integrity in everything that we do. We will promote proactive risk management at all levels of the organisation, ensuring resilience throughout the business.

Oakray Limited understands the importance of robust leadership. Our Managing Director, Board of Directors and Senior Management Team work together to set the strategic direction of Oakray Limited, ensuring we work towards our sustainability and social targets.

The leadership team is responsible for ensuring that the organisation's policies convey clear guidance, and are implemented, monitored, reported on and improved.

Oakray Limited will undertake due diligence of our supply chain(s) and business partnerships to ensure they are not inadvertently supporting modern slavery, forced labour, human rights abuses or environmental degradation.

Our Board of Directors respect boundaries between the company and private interests. They do not seek to exploit their position over the company to pursue their own interests at the expense of stakeholders.

Targets and Key Performance Indicators (KPIs)

Oakray Limited is committed to achieving measurable outcomes across all aspects of our Environmental, Social and Governance (ESG) strategy. To support this, we have established a series of targets and key performance indicators (KPIs) to guide progress, ensure transparency, and promote continuous improvement. These will be reviewed bi-annually and updated in response to stakeholder needs, regulatory developments, and organisational growth.

Environmental KPIs and Targets:

- Achieve Net Zero carbon emissions across Scope 1 and Scope 2 by 2035, and Scope 3 by 2045.
- Source 100% of company electricity from renewable sources by 2027.
- Reduce company-wide energy consumption by 10% by 2028, based on a 2024 baseline.
- Divert 100% of non-hazardous waste from landfill by 2025.
- Conduct annual environmental audits of all operational sites starting 2025.

Social KPIs and Targets:

- Achieve gender parity (50% female representation) on the board and senior leadership team by 2035.
- Increase the ethnic diversity of senior leadership by 25% by 2030.
- Ensure 100% of employees complete at least one ESG-related training module per year.
- Provide all staff with access to mental health and wellbeing resources, with annual uptake monitored and reported.
- Track and report community investment annually, including hours volunteered and financial contributions.

Governance KPIs and Targets:

- Conduct annual ESG risk assessments with documented mitigation actions.
- Perform an independent third-party governance audit every 3 years.



- Ensure all employees complete anti-bribery, ethics and compliance training every 3 years.
- Require ESG clauses in 100% of supplier contracts by 2028.
- Include ESG performance as a formal component of executive remuneration structures by 2027.

Monitoring and Reporting

Progress against these KPIs will be reviewed quarterly by the ESG Committee and reported to the Board of Directors annually. Where appropriate, Oakray Limited will align our ESG disclosures with recognised frameworks such as the Global Reporting Initiative (GRI), Task Force on Climate-related Financial Disclosures (TCFD), and the United Nations Sustainable Development Goals (UN SDGs). This approach ensures that our stakeholders can evaluate our performance in a transparent, meaningful, and consistent way.

Continual Review

Oakray Limited is committed to preventing and mitigating instances of non-compliance with this policy. Any breaches or concerns should be reported as soon as possible to the Managing Director, Board of Directors or a Senior Management Team Member.

We will ensure that any changes in law or regulations are accurately accounted for within this policy. Similarly, any changes in stakeholder needs, such as the introduction of new green technologies, will be monitored and considered where appropriate.

Progress on the targets and objectives set out in this policy will be reported to the board on an annual basis.

Active participation and engagement at all levels of the organisation is of great importance to ensure employee involvement with our ESG framework. This will be encouraged through employee participation, training initiatives and monitored using employee engagement surveys. Outcomes will be reported.

Document History
(For previous version changes, please look to the document control spreadsheet)

Version Number	Date	Created by	Signature	Approved	Signature	Description	Review date
1	26/03/2025	Rosetta Tona		James Barnard		First issue	26/03/2026