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**ESG Policy Commitment**

[This ESG Policy Statement is prepared on behalf of the Company (“the Company”) pursuant to its ESG Strategy (the “ESG Strategy”) as at <<insert date>>.]

The ESG policy of the Company is to ensure that it is applicable and reasonably practicable that its operations will be conducted in accordance with its commitment to:

- (a) protecting and enhancing the environment and maximising positive impact on the environment;
- (b) ensuring appropriate conduct of business with employees, customers/clients, suppliers and other stakeholders;
- (c) conduct its business with integrity and in accordance with the highest standards of business ethics, through appropriate structures, systems, processes and procedures.

(the Company’s “ESG Commitment”).

The ESG Commitment is a fundamental part of the Company’s business.

Fulfilling the ESG Commitment is the responsibility of all employees of the Company.

**General ESG Principles**

In fulfilling the ESG Commitment, the Company will:

- comply with all applicable laws, rules, regulations and other requirements having the force of law in relation to any aspects of its ESG Commitment; and
- where it is practicable and appropriate, exceed the requirements of any applicable laws, rules, regulations and other requirements to any aspects of its ESG Commitment by law.

All Company employees must, in addition to the objectives of this ESG Policy Statement, ensure that they are familiar with, and work in accordance with, the ESG Policy Statement.

The Company expects suppliers and contractors working for the Company [and their subcontractors] to adopt and implement the ESG Commitment in their own business.

[<sup>1</sup>All contractors working on behalf of the Company are required][expected] to

[adopt [policies and] standards for the Company] as set out in this ESG Policy Statement and to achieve comparable results to the Company.

**AND/OR**

[comply with the Company’s Contractual ESG Requirements]

<sup>1</sup> This note is not part of this template. You might consider requiring all contractors/suppliers’ management of ESG issues to be agreed by contractors/suppliers and/or include a “self-certification” clause in contracts with suppliers/contractors obliging them to comply with the Company’s ESG requirements.

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of <<Company Name>> (“the Company”) as at <<insert date>>.]

it is applicable and reasonably practicable that its operations will be conducted in accordance with its commitment to:

- minimising negative impact and maximising positive impact on the environment;
- ensuring appropriate conduct of business with employees, customers/clients, suppliers and other stakeholders;
- conduct its business with integrity and in accordance with the highest standards of business ethics, through appropriate structures, systems, processes and procedures.

Company’s business.

Directors>> of the Company.

laws, rules, regulations and other requirements having the force of law in relation to any aspects of its ESG Commitment; and

where it is practicable and appropriate, exceed the requirements of any applicable laws, rules, regulations and other requirements to any aspects of its ESG Commitment by law.

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[ All suppliers to the Company are [
[adopt [policies and] standards f
Statement and to achieve compar

se set out in this ESG Policy
-.]

AND/OR

[comply with the Company's Supplie

Environmental

The Company has produced the fo
practices to implement the environn

framework for the introduction of
G Commitment:

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[Identifying and managing envi

s]

[Operating management proce
and implementation]

mental factors during business planning

[Communicating on environm
customers and members of the

government officials, employees,

[Carrying out of environmental

[Promoting environmental pri
companies, employees and me

ence with regulatory bodies, other

[Influencing legislative deve
environmental matters concern

ment of public understanding of
s]

[Promoting a culture of environ

t all employees]

[Providing training for all emp
functions in a manner that sho

enable them to carry out their job
]

[Involving customers, supplie
objectives]

the implementation of these ESG

[Continuously improving en
environmental best practice int

and integration of recognised

[Measuring, and acting to redu

business activities]

[Focusing on action to conserv
land and to increase recycling

minimise emission to air, water and

[Protecting the environment by
gases or solids]

d, air or water via leakage of liquids

[Swiftly responding to accident
including reporting details of
<<Directors>> so that they ca
recurrence.]

potential to threaten the environment,
dent or incident at work to the
mpt action to make good and avoid

[Minimising of waste by evalua

g they are as efficient as possible]

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2 This is only intended to provide some suggeste
This list of examples can be used as a prompt or
comprehensive list of subjects or points that a bu
You will need to decide which (if any) of these ob
are not relevant. You will also need to decide wh
will also need to add any further objectives which
circumstances – every business will have differe
Whilst it is useful to include a list of general and/
can realistically commit. If you cannot commit ful
include it or you should draft it in a more general
Where necessary, you could also dilute a genera
Company aims to ....” provided that it is a genuir

that can be covered but it is not a
ess so that you can then delete those which
ing of any which you decide to retain. You
portant to your particular business and
or should include.
only include those to which your business
any particular objective, you should either not
cally commit.
g introductory language in it such as “the

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[Managing waste generated from re-use and recycling]

According to the principles of reduction,

[Managing and disposing of all waste in a manner in ways that show concern for the environment]

[Ensuring that as many waste materials as possible are recycled via waste contractors]

[Using only registered carriers for waste disposal]

recycle wherever possible]

[Providing advice on safe handling and disposal to customers, contractors and subcontractors]

vehicles, their transportation and their final disposal]

[Encouraging development of new products and services that are beneficial to the environment]

equipment with concern for the future]

[Giving due consideration to energy efficiency or refurbishment of existing buildings]

energy performance in the acquisition and location of new buildings]

[Promoting environmentally friendly products and services]

g]

[Taking steps to improve environmental performance, considering whether, to avoid the use of air transport and business travel, including meetings, should be held remotely]

[Where possible, using recycled paper]

per]

[Using 'waste' paper for notepaper]

may be compromised]

[Reducing consumption of resources, such as paper, double sided where practicable]

efficiency of those resources by printing]

[Recycling of all paper products]

[Recycling of all packaging materials]

polystyrene moulds and chippings]

[Where possible, reducing consumption of energy]

[fitting LED lighting where appropriate]

[ensuring that lights are switched off when not in use]

[working to reduce heat loss from buildings]

or poorly sealed windows]

[Handing out plastic shopping bags as a last resort, and offering reusable bags instead]

if they ask for them, and offering]

[Storing any bulk liquids in bunded containers]

**Social**

The Company has produced the following framework for the introduction of social practices to implement the social aspects of the business:

framework for the introduction of social aspects of the business:

[Prohibiting any infringement of laws, regulations, codes of practice, and by those in its supply chain, and any participation in or connection with any such infringement]

The Company, its officers and employees, and its supply chains. In particular, by prohibiting any participation in or connection with any such infringement, child labour or human trafficking]

[Avoiding investment in or any other business relationships with companies, for example, gambling, tobacco and alcohol]

countries with a negative social impact, and any participation in or connection with any such infringement, manufacture/sales]

[Prohibiting any bribery or corruption]

officers or employees]

[Prohibiting any money laundering]

employees]

[Encouraging ethical behaviour throughout the supply chain]

in the Company and amongst its]

[Ensuring compliance by the Company and its supply chain with health and safety laws and standards, and mitigating risks to health and safety]

health and safety laws and standards,

<sup>3</sup> See footnote 2 above.

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[Maintaining suitable privacy and security of the Company]

in respect of all stakeholders of the Company]

[Maintaining an inclusive and diverse workforce as a high priority]

where the wellbeing of employees is a high priority]

[Promoting diversity and inclusion across the Company's workforce]

across the Company's workforce]

[Providing and maintaining a safe and secure working environment free from all forms of discrimination, harassment and bullying under any circumstances, including but not limited to, simple gender, gender identity or expression, race, colour, creed or religion, marital status or ancestry, age, marital status or sexual orientation]

free from all forms of discrimination, harassment and bullying under any circumstances, including but not limited to, simple gender, gender identity or expression, race, colour, creed or religion, marital status or ancestry, age, marital status or sexual orientation]

[Ensuring that the Company does not discriminate, harass or otherwise treat or deal with any employee on the basis of gender, gender identity or expression, race, colour, creed or religion, marital status or ancestry, age, marital status or sexual orientation]

and does not discriminate, harass or otherwise treat or deal with any employee on the basis of gender, gender identity or expression, race, colour, creed or religion, marital status or ancestry, age, marital status or sexual orientation]

[Creating a positive and rewarding working environment for the Company's employees]

for the Company's employees]

[Providing team building activities for the Company's employees]

for the Company's employees]

[Providing a fair and rewarding working environment based on personal performance]

based on personal performance]

[Encouraging and assisting to provide a flexible and considerate approach to employment and working conditions]

with a flexible and considerate approach to employment and working conditions]

[Pursuing a fair [and competitive] approach to employment and working conditions, including but not limited to, leave, sick leave and other aspects]

including but not limited to, leave, working hours and attendance, and other aspects]

[Providing subsidised employee benefits, including but not limited to, [medical][and][dental][services], [private health insurance], [club/gym membership][and][private health insurance]]

club/gym membership][and][private health insurance]]

[Making positive contributions to the community through charitable causes]

and [to [local] charities][and] [to worthy causes]

[Supporting the local community through charitable activities where appropriate]

where appropriate]

[Aiming to hold wellbeing, charitable and community activities in each year]

activities in each year]

[Encouraging employees to participate in charitable activities which benefit the welfare of members/sections of the [local] community where circumstances permit]

and to participate in charitable activities which benefit the welfare of members/sections of the [local] community where circumstances permit]

[Encouraging employees to participate in professional development activities, including any education or training, where circumstances permit]

professional education and training which includes any education or training, where circumstances permit, and where the Company is able to provide in-house]

[Providing sponsorship for initiatives which benefit [local] worthy causes]

benefiting [local] [charities][or][other worthy causes]

[Encouraging employees to not participate in any activities which are not in the best interests of the Company and other [local] worthy causes]

and other [local] worthy causes] for the benefit of the Company]

[Conducting employee satisfaction surveys by an independent third party]

by an independent third party]

[Ensuring that the Company's products and services meet all relevant standards of safety and quality for the benefit of its customers and stakeholders, with a view to retaining customer satisfaction]

and endeavours to provide customer satisfaction by maintaining a good relationship with them]

[Endeavouring to maintain good relationships with all stakeholders, including but not limited to, trade unions]

including trade unions]

[Engaging local suppliers where appropriate]

where appropriate]

[Paying the Company's suppliers in accordance with agreed terms and conditions]

in accordance with agreed terms and conditions]

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**Governance**

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The Company has produced the following practices to implement the governance

[Ensuring that the Company complies with applicable local and national laws and regulations, relevant standards and reporting both generally and in particular to transparency and corporate governance]

[Establishing clear and effective corporate governance when relevant, setting goals and establishing accountability [through the Company] and reports to its board]

[Ensuring that the Company promotes the use of best practice on corporate governance when relevant, setting goals and establishing accountability [through the Company] and reports to its board]

[Adopting and maintaining suitable and clear governance structures, including terms of reference for the board that, as appropriate, set out the required composition of the board, its powers and responsibilities]

[Appointing and maintaining [an] ESG committee and adopting and maintaining suitable and clear terms of reference for [those committees]

[Appointing and maintaining a [an] ESG committee and adopting and maintaining suitable and clear terms of reference for [those committees]

[Ensuring that the Company maintains suitable and clear terms of reference for [those committees]

[Ensuring that the Company maintains suitable and clear terms of reference for [those committees]

[The Company is committed to maintaining high standards of business ethics through a strong code of ethics and ongoing ethics training and promotion of a culture of integrity, honest conduct in its business activities and behaviours]

[The Company is committed to preventing and detecting internal misconduct activities and promoting high standards of business ethics through a strong code of ethics and ongoing ethics training and promotion of a culture of integrity, honest conduct in its business activities and behaviours]

[Establishing and maintaining suitable and clear terms of reference for [those committees]

[Engaging with stakeholders [relevant to the Company's business] through transparency, open communications and reporting on [any issues including] ESG issues]

[Ensuring that the Company maintains suitable and clear terms of reference for [those committees]

[Dealing with [regulators], tax authorities and other relevant stakeholders in an open and co-operative manner]

[Ensuring the resilience and long-term sustainability of the Company's business]

[Ensuring that the Company maintains suitable and clear terms of reference for [those committees]

framework for the introduction of Commitment:

applicable local and national laws and regulations both generally and in particular to transparency and corporate governance]

promoting the use of best practice on corporate governance when relevant, setting goals and establishing accountability [through the Company] and reports to its board]

and transparency at all levels of its

governance structures, including terms of reference for the board that, as appropriate, set out the required composition of the

[an] ESG committee and adopting and maintaining suitable and clear terms of reference for [those committees]

[an] ESG committee and adopting and maintaining suitable and clear terms of reference for [those committees]

governance structures, including terms of reference for the board that, as appropriate, set out the required composition of the

maintaining suitable and clear terms of reference for [those committees]

maintaining high standards of business ethics through a strong code of ethics and ongoing ethics training and promotion of a culture of integrity, honest conduct in its business activities and behaviours]

preventing and detecting internal misconduct activities and promoting high standards of business ethics through a strong code of ethics and ongoing ethics training and promotion of a culture of integrity, honest conduct in its business activities and behaviours]

anti-bribery and corruption, code/s of conduct, as part of the governance structures, including terms of reference for the board that, as appropriate, set out the required composition of the

relationships through transparency, open communications and reporting on [any issues including] ESG issues]

other relevant stakeholders in an open and co-operative manner]

resilience and long-term sustainability of the Company's business]

resilience of its business to various risks]

## Measuring and reporting on ESG

The Directors will adopt and implement detailed clear written requirements for compliance with this ESG Policy Statement

- metrics and methods for measuring and reporting on ESG issues to show trends over time and progress

(to time as they deem necessary) to monitor and report on the Company's

company, of compliance sufficient to meet the Company's ESG objectives [and [any] targets];

<sup>4</sup> See footnote 2 above.

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and

- requirements as to reporting intervals [not exceeding [12 months]] on the information disclosed [and on disclosures on ESG issues].

ular intervals [not exceeding [12 months]] on the information disclosed [and on disclosures on ESG issues].

The Directors will publish to stakeholders the requirements when they are adopted and whenever they are varied.

ten requirements when they are adopted and whenever they are varied.

**Status of this ESG Policy**

The Directors and [Senior] Management are fully committed to its implementation.

The Directors and [Senior] Management are fully committed to its implementation.

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

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[This ESG Policy Statement will be made freely available to all stakeholders and posted on the company's public website so that it is freely available to all stakeholders and posted on the company's public website so that it is

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This ESG Policy Statement has been approved by:

This ESG Policy Statement has been approved by:

Name: <<Insert Name>>

Name: <<Insert Name>>

Position: <<Insert Position>>

Position: <<Insert Position>> Director>>

Signature: .....

Signature: .....

Dated: <<Date>>

Dated: <<Date>>

