

## ESG Policy Commitment

[This ESG Policy Statement is prepared by the Company pursuant to its ESG Strategy.]

The ESG policy of the Company is such that it is practicable that its operations will be conducted in a manner that:

- (a) protecting and enhancing the environment, minimising 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 appropriate structures, systems, and processes.

(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 Directors>> of the Company.

## General ESG Principles

In fulfilling the ESG Commitment, the Company must:

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

All Company employees must, in accordance with 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 to]

[adopt [policies and] standards for the Company and to achieve comparable results to the Company’s ESG Policy Statement and to achieve comparable results to the Company’s ESG Policy Statement.]

## AND/OR

[comply with the Company’s Contractual Obligations]

<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 clause in the contract obliging them to comply with the Company’s ESG requirements.

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of <<Company Name>> (“the Company”) [effective from <<start date>>].]

it is applicable and reasonably practicable that its operations will be conducted in a manner that:

- minimising negative impact and maximising positive impact on the environment;
- conduct on and good relationships with employees, customers/clients, suppliers and other stakeholders; and
- adhere to the principles and standards of business ethics, through appropriate structures, systems, and processes.

Company’s business.

Directors>> of the Company.

s, rules, regulations and other measures having the force of law, and in accordance with the ESG Commitment; and

lish and meet standards relevant to any aspects of its ESG Commitment by law.

s, adhere to the principles and objectives of this ESG Policy Statement, ensure that they are familiar with, and work in accordance with, the ESG Policy Statement.

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

ired][expected] to

se set out in this ESG Policy Statement and to achieve comparable results to the Company’s ESG Policy Statement.]

take other steps to assess prospective contractors/suppliers’ management of ESG issues or code of conduct covering ESG criteria to be agreed by contractors/suppliers and/or include a clause in contracts with suppliers/contractors obliging them to comply with the Company’s ESG requirements listed in a schedule attached to the contract and/or a “self-certification” clause requiring them to certify periodically that they are meeting your

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

**AND/OR**

[comply with the Company's Supp

## **Environmental**

The Company has produced the f  
practices to implement the environ

*[Identifying and managing env*

*[Operating management proc  
and implementation]*

*[Communicating on environ  
customers and members of th*

*[Carrying out of environmental*

*[Promoting environmental p  
companies, employees and m*

*[Influencing legislative dev  
environmental matters concer*

*[Promoting a culture of enviro*

*[Providing training for all en  
functions in a manner that sho*

*[Involving customers, suppli  
objectives]*

*[Continuously improving e  
environmental best practice in*

*[Measuring, and acting to red*

*[Focusing on action to conse  
land and to increase recycling*

*[Protecting the environment b  
gases or solids]*

*[Swiftly responding to acciden  
including reporting details  
<<Directors>> so that they c  
recurrence.]*

*[Minimising of waste by evalu*

<sup>2</sup> This is only intended to provide some sugges  
This list of examples can be used as a prompt  
comprehensive list of subjects or points that a b  
You will need to decide which (if any) of these c  
are not relevant. You will also need to decide w  
will also need to add any further objectives whi  
circumstances – every business will have differ  
Whilst it is useful to include a list of general and  
can realistically commit. If you cannot commit f  
include it or you should draft it in a more genera  
Where necessary, you could also dilute a gene  
Company aims to ....” provided that it is a genu

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ose set out in this ESG Policy  
e.]

a framework for the introduction of  
SG Commitment:

*ds]*

*ental factors during business planning*

*h government officials, employees,*

*rience with regulatory bodies, other*

*ment of public understanding of  
ss]*

*st all employees]*

*o enable them to carry out their job  
nt]*

*the implementation of these ESG*

*e and integration of recognised*

*business activities]*

*to minimise emission to air, water and*

*nd, air or water via leakage of liquids*

*potential to threaten the environment,  
cident or incident at work to the  
rompt action to make good and avoid*

*ng they are as efficient as possible]*

s that can be covered but it is not a

ness so that you can then delete those which  
rding of any which you decide to retain. You  
important to your particular business and  
t or should include.

ld only include those to which your business  
t any particular objective, you should either not  
tically commit.

ing introductory language in it such as “the

*[Managing waste generated from the Company's operations in a way that complies with the principles of reduction, re-use and recycling]*

*[Managing and disposing of waste in a manner that shows concern for the environment]*

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

*[Using only registered carriers for waste disposal]*

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

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

*[Giving due consideration to the energy performance of buildings or refurbishment of existing buildings]*

*[Promoting environmentally friendly modes of transport]*

*[Taking steps to improve environmental performance, including considering whether, to avoid, reduce or offset any negative impacts]*

*[Where possible, using recycled paper]*

*[Using 'waste' paper for notepaper]*

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

*[Recycling of all paper products]*

*[Recycling of all packaging materials]*

*[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]*

*[Handing out plastic shopping bags only if they ask for them, and offering reusable bags instead]*

*[Storing any bulk liquids in bulk containers]*

## **Social**

The Company has produced the following framework for the introduction of social practices to implement the social and environmental commitment:

*[Prohibiting any infringement of laws, regulations, codes of practice, and by those in its supply chain, including any participation in or connection with any activity that is prohibited]*

*[Avoiding investment in or any other relationship with industries with a negative social impact, such as gambling, tobacco and pornography]*

*[Prohibiting any bribery or corruption]*

*[Prohibiting any money laundering]*

*[Encouraging ethical behaviour throughout the supply chain]*

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

According to the principles of reduction,

manner in ways that show concern for

recycled via waste contractors]

to recycle wherever possible]

ts, their transportation and their final

equipment with concern for the future

energy performance in the acquisition and location of new buildings]

ing]

nsport and business travel, including any travel that can be held remotely]

aper]

may be compromised]

ciency of those resources by printing

, polystyrene moulds and chippings]

s]

or poorly sealed windows]

y if they ask for them, and offering

framework for the introduction of social practices to implement the social and environmental commitment:

ne Company, its officers and employees, and by those in its supply chains. In particular, by prohibiting any participation in or connection with any activity that is prohibited, including any participation in or connection with any activity that is prohibited, including any participation in or connection with any activity that is prohibited]

ustries with a negative social impact, such as gambling, tobacco and pornography]

officers or employees]

r employees]

in the Company and amongst its

health and safety laws and standards, and mitigating risks to health and safety]

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

[Maintaining s  
Company]

[Maintaining a  
high priority]

[Promoting di

[Providing an  
harassment a  
expression, ra  
ancestry, age

[Ensuring tha  
or otherwise t  
expression, ra  
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[Creating a po

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personal perf

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[Providing su  
[medical][and

[Making posit  
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of members/s  
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[Encouraging  
supports their  
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and quality fo  
satisfaction] v

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## Governance

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curity measures in respect of all stakeholders of the

re workplace where the wellbeing of employees is a

st the Company's workforce]

vironment free from all forms of discrimination,  
stances, for example gender, gender identity or  
nationality or national origin, ethnicity or ethnic origin,  
reference]

lect, engage, place, promote, transfer or compensate  
yees on the basis of gender, gender identity or  
nationality or national origin, ethnicity or ethnic origin,  
reference]

place for the Company's employees]

employees]

tion policy and practise linked to business and

work/ life balance with a flexible and considerate  
actices, including working from home]

ch to remuneration, working hours and attendance,  
llbeing]

including [health club/gym membership][and][private  
d care facilities]

al] community][and] [to [local] charities][and] [to worthy

oying local people where appropriate]

and social activities in each year]

and contribute to activities which benefit the welfare  
unity, allowing paid time-off for the employees where

appropriate further education and training which  
allowing paid time-off where circumstances permit,  
the Company itself is able to provide in-house]

vents run by or benefiting [local] [charities][or][other

cal] [charities]][and other [local] worthy causes] for  
employees and/or for donation by the Company]

ys, undertaken by an independent third party]

and][services] meet all relevant standards of safety  
rs][clients] [and endeavouring to provide customer  
omers and maintaining a good relationship with them]

s with any relevant trade unions]

ate]

y and on time]

The Company has practices to implement

*[Ensuring that regulations, relevant to transparency]*

*[Establishing corporate governance and accountability]*

*[Ensuring that organization]*

*[Adopting and reference for board, its power]*

*[Appointing and maintaining]*

*[Appointing and maintaining]*

*[Ensuring that accountability]*

*[Ensuring that procedures and]*

*[The Company through a strategy of a culture of behaviours]*

*[The Company internal misconduct]*

*[Establishing conduct, compliance structure of the]*

*[Engaging with]*

*[Ensuring that open communication issues]*

*[Dealing with open and co-ordination]*

*[Ensuring the]*

*[Ensuring that climate change]*

## Measuring and

The Directors will also detailed clear written compliance with this

- metrics and results show trends over

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

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objectives<sup>4</sup> as a framework for the introduction of the ESG Commitment:

*with, at least, all applicable local and national laws and of practice relating both generally and in particular to]*

*ence for ESG, promoting the use of best practice on of possible, and setting goals and establishing ESG committee] and reports to its board]*

*strong oversight and transparency at all levels of its*

*and clear governance structures, including terms of other matters, set out the required composition of the*

*committee][and an ESG committee] and adopting and reference for [that committee][those committees]*

*remuneration committee and adopting and reference for that committee]*

*exemplary board stewardship and management*

*implements adequate internal controls, processes, ent]*

*ing and maintaining high standards of business ethics business conduct, ongoing ethics training and promotion and responsible conduct in its business activities and*

*ing that no corruption, bribery, money laundering or place in the business]*

*policies covering anti-bribery and corruption, code/s of and human resources, as part of the governance*

*about ESG issues]*

*strong stakeholder relationships through transparency, stakeholder input on [any issues including] ESG*

*and auditors and other relevant stakeholders in an*

*reservation of value for the Company's business]*

*risk exposure and builds the resilience of its business to catastrophic events]*

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vary from time to time as they deem necessary) company to monitor and report on the Company's including:

ent, by the Company, of compliance sufficient to against established objectives [and [any] targets];

and

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

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

### Status of this ESG Policy Statement

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

This ESG Policy Statement will be updated as necessary.

[This ESG Policy Statement will be published on the company's public website so that it is freely available to all stakeholders.]

This ESG Policy Statement has been approved by:

Name: <<Insert Name>>

Position: <<Insert Position, e.g. Managing Director>>

Signature: .....

Dated: <<Date>>

regular intervals [not exceeding [12 months]] on the information on [disclosures on ESG issues].

written requirements when they are adopted and whenever they are revised.

This ESG Policy Statement and are fully committed to its implementation.

updated as necessary.

company's public website so that it is freely available to all stakeholders.]

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Name: <<Insert Name>>

Position: <<Insert Position, e.g. Managing Director>>

Signature: .....

Dated: <<Date>>

g Director>>

.....