

ENVIRONMENTAL, SOCIAL & GOVERNANCE

Our policy commitment

This ESG Policy Statement is produced by the Directors of Trafalgar House Pensions Administration Limited (“Trafalgar House”).

About this policy

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

- 01 / protecting and enhancing the environment by minimising negative impact and maximising positive impact on the environment;
- 01 / ensuring appropriate conduct towards, positive impact on and good relationships with employees, customers/clients, suppliers and the community in which it operates; and
- 01 / conduct its business with integrity and high standards of business ethics, through appropriate structures, systems, processes and procedures.

(Trafalgar House’s “ESG Commitment”).

The ESG Commitment is a fundamental principle of Trafalgar House’s business. Fulfilling the ESG Commitment is the responsibility of the Directors

General ESG principles

In fulfilling the ESG Commitment, Trafalgar House seeks to:

- /// 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
- /// 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 Trafalgar House 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.

Trafalgar House expects suppliers of goods and services to Trafalgar House and contractors working for Trafalgar House and their suppliers and sub-contractors to adopt and implement the ESG Commitment in their own businesses.

All contractors working on behalf of Trafalgar House are required to adopt policies and standards fully consistent with those set out in this ESG Policy Statement and to achieve comparable levels of performance.

All suppliers to Trafalgar House are expected to adopt policies and standards fully consistent with those set out in this ESG Policy Statement and to achieve, or set out an agreed plan to achieve, comparable levels of performance.



Environmental

Trafalgar House has produced the following objectives as a framework for the introduction of practices to implement the environmental aspects of the ESG Commitment:

- // Identifying and managing environmental risks and hazards
- // Operating management procedures to include environmental factors during business planning and implementation
- // Communicating on environmental matters freely with government officials, employees, customers and members of the public
- // Carrying out regular environmental audits through the Planet Mark accreditation scheme
- // Promoting environmental principles by sharing experience with regulatory bodies, other companies, employees and members of the public
- // Promoting a culture of environmental awareness amongst all employees
- // Providing training for all employees as appropriate to enable them to carry out their job functions in a manner that shows care for the environment
- // Involving customers, suppliers and subcontractors in the implementation of these ESG objectives
- // Continuously improving environmental performance and integration of recognised environmental best practice into business operations
- // Measuring, and acting to reduce, the carbon footprint of business activities
- // Focusing on action to conserve resources and energy, to minimise emission to air, water and land and to increase recycling rates
- // Protecting the environment by preventing pollution of land, air or water
- // Minimising of waste by evaluating operations and ensuring they are as efficient as possible
- // Managing waste generated from business operations according to the principles of reduction, re-use and recycling
- // Managing and disposing of all waste in a responsible 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 to dispose of waste, and to recycle wherever possible
- // Providing advice on safe handling of Company products, their transportation and their final disposal to customers, contractors, etc.
- // Encouraging development of products, processes and services with concern for the future of the environment
- // Giving due consideration to environmental issues and energy performance in the acquisition or refurbishment of existing buildings, and the design and location of new buildings
- // Promoting environmentally friendly responsible purchasing
- // Taking steps to improve environmental efficiency of transport and business travel, including considering whether, to avoid travelling, any meetings can be held remotely
- // Where possible, using recycled or ecologically friendly paper and other stationery
- // Using 'waste' paper for notepads unless confidentiality may be compromised
- // Reducing consumption of resources and improving efficiency of those resources by printing double sided where practicable
- // Recycling of all paper products, ink or toner cartridges
- // Where possible, reducing consumption of resources by
 - fitting LED lighting when replacing bulbs
 - ensuring that lights are turned off in empty areas
 - working to reduce heat loss through open doors or poorly sealed windows.

Social

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

- // Prohibiting any infringement of civil or human rights by Trafalgar House, its officers and employees, and by those in its services supply chains. In particular, by prohibiting any participation in or connection with any modern slavery, child labour or human trafficking
- // Avoiding investment in or any other connection with industries with a negative social impact, for example, gambling, tobacco, pornography or weapons manufacture/sales
- // Prohibiting any bribery or corruption of, or by, any of its officers or employees
- // Prohibiting any money laundering by any of its officers or employees
- // Encouraging ethical behaviour and decision making within Trafalgar House and amongst its supply chain
- // Ensuring compliance by Trafalgar House with workplace health and safety laws and standards, and mitigating risks to health and safety in the workplace
- // Maintaining suitable privacy and data security measures in respect of all stakeholders of Trafalgar House
- // Maintaining an inclusive and collaborative workplace where the wellbeing of employees is a high priority
- // Promoting diversity and inclusion amongst Trafalgar House's workforce
- // 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
- // Ensuring that Trafalgar House does not select, engage, place, promote, transfer or compensate or otherwise treat or deal with any employees on the basis of gender, gender identity or expression, race, colour, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital status or sexual preference
- // Creating a positive and rewarding workplace for the Trafalgar House's employees
- // Providing team building activities for employees
- // Providing a fair and rewarding remuneration policy and practise linked to business and personal performance
- // Committing that everyone has at least the minimum income necessary to meet their basic needs through our public commitment to be a Living Wage employer
- // Encouraging and assisting to provide a work/ life balance with a flexible and considerate approach to employment and working practices, including working from home
- // Pursuing a fair and competitive approach to remuneration, working hours and attendance, leave, sick leave and other aspects of wellbeing
- // Providing access to an employee benefits package that includes health club/gym membership and private medical, dental services and child care facilities.
- // Making positive contributions to the local community and charities
- // Holding wellbeing, charity events and social activities in each year
- // Encouraging employees to participate in and contribute to activities which benefit the welfare of members/sections of the community, allowing paid time-off for the employees where circumstances permit
- // 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 Trafalgar House itself is able to provide in-house
- // Providing sponsorship for initiatives or events run by or benefiting charities or other worthy causes
- // Encouraging employees to nominate charities and other worthy causes for participation by Trafalgar House and its employees and/or for donation by Trafalgar House

- /// Conducting employee satisfaction surveys, undertaken by an independent third party
- /// Ensuring that Trafalgar House's services meet all relevant standards of quality for the benefit of its clients and endeavouring to provide customer satisfaction with a view to retaining customers and maintaining a good relationship with them
- /// Paying Trafalgar House's suppliers properly and on time.

Governance

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

- /// Ensuring that Trafalgar House 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
- /// 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
- /// Ensuring that Trafalgar House promotes strong oversight and transparency at all levels
- /// 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
- /// Appointing and maintaining management groups and committees and adopting and maintaining suitable and clear terms of reference for those committees
- /// Ensuring that Trafalgar House maintains exemplary board stewardship and management accountability
- /// Ensuring that Trafalgar House adopts and implements adequate internal controls, processes, procedures and proactive risk management
- /// Trafalgar House 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

- /// Trafalgar House is committed to ensuring that no corruption, bribery, money laundering or internal misconduct activities are taking place in the business
- /// Establishing and maintaining detailed policies covering anti-bribery and corruption, conflicts of interest, privacy, whistle blowing and human resources, as part of the governance structure of Trafalgar House
- /// Engaging with stakeholders about ESG issues
- /// Ensuring that Trafalgar House cultivates strong stakeholder relationships through transparency, open communications and responding to stakeholder input on ESG issues
- /// Dealing with regulators, tax authorities and auditors and other relevant stakeholders in an open and co-operative manner
- /// Ensuring the resilience and long-term preservation of value for Trafalgar House's business
- /// Ensuring that Trafalgar House mitigates risk exposure and builds the resilience of its business to climate change and other catastrophic events.

Measuring & reporting compliance

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

- /// metrics and methods for measurement, by Trafalgar House, of compliance sufficient to show trends over time and progress against established objectives; and
- /// requirements as to reporting to stakeholders at regular intervals on the information derived from that measurement and on disclosures on ESG issues.

Status of this ESG Policy Statement

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

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

This ESG Policy Statement will be made available to all staff via the company intranet and will be published on our public website so that it is freely available to all stakeholders and others to view.

This ESG Policy Statement has been approved and authorised by:



GARRY WAKE
Managing Director

5 May 2022

Further information

For further information about this update you can speak to your client relationship manager or get in touch with one of our technical specialists.

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Whilst every effort has been made to ensure accuracy, information contained in this communication may not be comprehensive and recipients should not act upon it without seeking professional advice.

Trafalgar House Pensions Administration Limited

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