



ESG Pro Limited

Human Rights Policy

Overview

ESG Pro Limited respects and is committed to protecting everyone's human rights of all people in all fields and aspects of our operations. We will ensure that human rights are understood and complied with in all areas of our business, including those of our UK and international suppliers. We conduct business under the principles set out in the following international standards:

- UN Declaration of Human Rights,
- UN Guiding Principles on Business and Human Rights,
- UN Global Compact Principles,
- The International Labour Organisation's Fundamental Conventions.

Scope of Policy

This policy applies to all personnel of ESG Pro Limited, including all partners, employees (whether employed on a temporary, fixed term, permanent or part-time basis), workers and contractors. It is expected that suppliers, comply with the law as a minimum and should do their utmost to adhere to the principles of this policy.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

We require our suppliers to conduct regular human rights risk assessments within their supply chains and report results.

Enforcement

Please read this policy carefully as it serves to safeguard ESG Pro Limited's reputation as well as that of our employees and business partners.

Any violation of this policy could lead to an inquiry by ESG Pro Limited (if appropriate), disciplinary action against you, and other enforcement action.



For further information, employees should refer to ESG Pro Limited's Disciplinary Policy.

1. Policy

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. Our objective is to help enhance the enjoyment of human rights within the communities in which we operate.

At ESG Pro Limited, it is each and every employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment.

If any employee believes that someone, either within ESG Pro Limited or one of our suppliers or a contractor is violating this Human Rights Policy and/or the law, they are required to report it immediately to their Line Manager, Senior Management, or through the Whistle-blower process. We expect our suppliers and contractors to also have in place procedures which enable their own employees to report any concerns.

Monitoring and Evaluation: Key Performance Indicators (KPIs)

ESG Pro Limited is committed to monitoring and evaluating its adherence to the Human Rights Policy through measurable Key Performance Indicators (KPIs). These KPIs help ensure transparency, accountability, and continuous improvement. The following indicators will be tracked and reported regularly:

Supplier Compliance Audits

Target: Audit at least 100% of high-risk suppliers and 50% of all suppliers annually for compliance with human rights standards.

Measurement: Percentage of suppliers audited, with detailed records of audit results and corrective actions implemented.

Grievance Resolution Time

Target: Resolve 90% of reported grievances, including those related to human rights violations, within 30 days of receipt.

Measurement: Average time taken to investigate and close grievances, tracked through the company's reporting system.



Employee Satisfaction Rates

Target: Achieve at least a 95% satisfaction rate in annual surveys assessing employee perceptions of diversity, inclusion, and respect for human rights in the workplace.

Measurement: Feedback collected through structured employee surveys, with action plans developed to address identified gaps.

Training Completion Rates

Target: Ensure 100% of employees and contractors complete mandatory human rights training annually.

Measurement: Training logs documenting participation, completion rates, and feedback on training effectiveness.

Incident Reporting Trends

Target: Increase the reporting of incidents and near-misses by 20% annually, reflecting improved trust in grievance mechanisms.

Measurement: Number of reports submitted through the whistleblowing channel and other reporting systems, analysed for trends and recurring issues.

Policy Accessibility

Target: Make the Human Rights Policy accessible to 100% of suppliers in local languages by the end of the year.

Measurement: Tracking translations completed and distributed, with verification of receipt by suppliers.

Corrective Action Implementation

Target: Achieve 100% completion of corrective actions identified during audits within the specified timelines.

Measurement: Records of completed corrective actions, verified during follow-up audits.

Review and Reporting:



The KPIs will be reviewed quarterly by the Human Rights and Sustainability Committee, and an annual summary of progress will be included in the company's sustainability report. Corrective actions and strategies for improvement will be developed based on KPI outcomes.

Policy Accessibility and Training

ESG Pro Limited is committed to ensuring that all employees, suppliers, and contractors are fully aware of their responsibilities under the Human Rights Policy. To achieve this, the company has established the following measures:

Employee and Supplier Training

Regular Training Programmes: Conduct annual human rights training sessions for all employees, suppliers, and contractors. These sessions will cover the following topics:

The principles of the Human Rights Policy

- Legal and regulatory obligations related to human rights.
- Identifying and addressing potential human rights violations within operations and supply chains.
- Specialised Training: Provide targeted training for roles most at risk of encountering human rights violations, such as procurement teams and supplier auditors.
- Monitoring and Evaluation: Track training participation and completion rates to ensure 100% compliance. Feedback will be collected to assess the effectiveness of training sessions.
- Accessible Formats
- Translation of the Policy: Translate the Human Rights Policy into local languages for suppliers operating in non-English-speaking countries to ensure understanding and compliance.
- Digital Access: Publish the policy on the company website, making it accessible to all stakeholders, including suppliers, employees, and contractors.
- Supplier Communication: Distribute the policy directly to suppliers, accompanied by explanatory materials, to clarify expectations and encourage adherence.
- Updates and Notifications: Ensure that any updates to the policy are promptly communicated to all stakeholders via email notifications, training sessions, and the company website.



2. Areas of responsibility

2.1 We have identified the following main areas of responsibility:

- 2.1.1 **Equality and Diversity:** Our commitment is to provide a safe and inclusive working environment where all people are treated fairly and with respect. We require our suppliers and contractors to comply with any local legislation which applies to equality and diversity as well as adhering to our behaviours and values, thereby assisting us in delivering our commitment.
- 2.1.2 **Freedom of Association and Collective Bargaining:** We encourage our employees to exercise the right to join a trade union and as such they are free to join an organisation of their choice to represent them in line with local legislation. Collective Bargaining is enabled for staff and delivered through negotiations with ESG Pro Limited's Senior Management. We require our suppliers and contractors to respect their employees' right to freedom of association. If operating in the UK or anywhere else where local rights to collective bargaining exist, we require suppliers and contractors to allow this.
- 2.1.3 **Labour rights:** Just working conditions shall be provided for our employees including terms and conditions of employment, compensation, working hours, leisure time, holiday entitlements, maternity/paternity leave and benefits. We shall comply with all applicable legislation. We require our suppliers and contractors to comply with all applicable local legislation as well as adhere to our behaviours and values, supporting us in the delivery of our commitment.
- 2.1.4 **Wages:** ESG Pro Limited shall never pay their employees lower than it is required by law. We also require our suppliers to comply with all applicable legislation or, if there is no applicable local law in the country in which they operate, ensure that their pay will not be less than the average pay within that industry.
- 2.1.5 **Forced Labour (Slavery):** ESG Pro Limited has a policy of zero-tolerance towards acts of modern slavery which are unlawful and are a violation of fundamental human rights. We require our suppliers and contractors to comply with all applicable local legislation as well as adhere to our behaviours and values, supporting us in the delivery of our commitment.



2.1.6 **Safe and Healthy Workplace:** We are dedicated to upholding high standards for health and safety management, and we strive to consistently improve our effectiveness while minimising the risk. We will abide by all applicable laws and always act by prioritising safety, never putting unnecessary risk on people. We offer appropriate and pertinent training that is designed to create a safe and healthy workplace. We have a specific policy that outlines our dedication as well as the management's and staff's duties (see our Health & Safety Policy). We require that all of our suppliers and contractors follow all applicable laws as well as our behaviours and values in order to help us fulfil our commitment.

2.1.7 **Child Labour:** ESG Pro Limited complies with all relevant legislation regarding the rights of minors. We will never employ young persons under the age of 18. We do not tolerate the use of child labour and require that our suppliers do not use child labour in their operations or supply chain and shall conduct risk assessments to verify compliance.

2.1.8 **Due Diligence:** Suppliers are required to conduct regular human rights risk assessments within their supply chains and report results. These provisions are included into the contracts with our suppliers.

3. Grievance Mechanisms

3.1 ESG Pro Limited ensures workers have access to effective grievance mechanisms to report incidents or suspicions of modern slavery. This includes:

- A confidential whistleblowing channel.
- Clear reporting procedures for employees, suppliers, and contractors.
- Swift and transparent investigations into all allegations.
- Mechanisms to address grievances fairly, including collaboration with external organisations or authorities where necessary.

3.2 ESG Pro Limited expects suppliers and contractors to implement their own grievance mechanisms to allow their employees to report concerns related to modern slavery or other human rights violations.



Feedback and Improvements

We welcome feedback regarding our accessibility features and are committed to making continual improvements to enhance accessibility within our premises.

This version formalised and approved by the board of directors on **15 April 2026**

Humperdinck Jackman
CEO

Natashia Lee
Managing Director

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