ESG PRO LIMITED
Shrawley House, Shrawley,
Worcester, WR6 6TG, UK
www.esgpro.co.uk

ESG Pro Limited
Human Rights Policy

1. Overview

ESG Pro Limited respects and is committed to protecting the human rights of all people who may be affected by our operations and business relationships. We will ensure that human rights are understood and respected throughout our business, including in our relationships with UK and international suppliers, contractors and other business partners.

We conduct business in accordance with the principles of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Fundamental Conventions. We are committed to acting ethically and with integrity, and to identifying and addressing human rights risks connected with our activities and supply chains.

As a consultancy delivering services largely through remote working, digital systems, client engagements and business travel, we recognise that human rights considerations can arise in our own employment practices, supplier relationships, service delivery, and interactions with clients and other stakeholders.

2. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including directors, officers, employees (whether permanent, fixed-term, temporary or part-time), agency workers, consultants, contractors, interns and other representatives. We expect our suppliers, subcontractors and business partners to comply with applicable laws and to uphold the human rights principles described in this policy.

The policy applies to work undertaken remotely, during travel, at client or third-party premises, and through business communications and services delivered on behalf of ESG Pro Limited. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility and Enforcement

The Board of Directors has overall responsibility for ensuring this policy remains appropriate to our legal and ethical obligations. Senior Management is responsible for its implementation, communicating expectations, reviewing

identified risks and concerns, and taking appropriate action where a breach is identified.

At ESG Pro Limited, it is each employee's responsibility to maintain a work environment that reflects respect for human rights and is free from discrimination, harassment and unfair treatment. All persons covered by this policy are expected to read, understand and comply with its requirements, cooperate with appropriate reviews, and raise concerns where necessary.

Any violation of this policy may lead to an investigation and, where appropriate, disciplinary action in accordance with the Company's Disciplinary Policy. Serious or repeated breaches by suppliers, contractors or other business partners may result in corrective action requirements, suspension or termination of the business relationship.

4. Policy

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. Our commitment is to support fair working conditions, safeguard individual dignity and help prevent adverse human rights impacts in the communities and business relationships connected with our work.

We will consider relevant human rights risks when making business and procurement decisions, engaging external providers and reviewing our working practices. Where potential or actual adverse impacts are identified, we will respond proportionately, consider the views of affected people where appropriate, and take steps to prevent recurrence.

5. Main Areas of Responsibility

We have identified the following main areas of responsibility:

5.1 Equality and Diversity: Our commitment is to provide a safe and inclusive working environment where all people are treated fairly and with respect. We do not tolerate unlawful discrimination, bullying, harassment, sexual harassment or victimisation. Employment decisions are based on legitimate business requirements and individual competence, and we expect suppliers and contractors to respect the same principles and applicable equality legislation.

5.2 Freedom of Association and Collective Bargaining: We respect the right of employees to join, or choose not to join, a trade union and to participate in lawful collective bargaining, without intimidation or adverse treatment. Employees can raise matters affecting their working conditions with Senior Management, and we support meaningful consultation and participation in matters relevant to occupational health and safety. We expect suppliers and

contractors to respect these rights in accordance with applicable local legislation.

5.3 Labour Rights and Fair Working Conditions: Fair working conditions shall be provided for our employees, including lawful terms and conditions of employment, working hours, rest periods, holiday entitlements, family-related leave and other statutory employment rights. We do not permit coercion, unlawful deductions or practices that prevent workers from leaving employment in accordance with their legal and contractual obligations. We require our suppliers and contractors to comply with applicable employment laws.

5.4 Wages: ESG Pro Limited shall not pay employees below the applicable legal minimum wage and will meet relevant obligations concerning pay, working time and benefits. We expect suppliers and contractors to comply with applicable wage and payment legislation and to provide their workers with transparent information about their terms of employment.

5.5 Forced Labour, Modern Slavery and Human Trafficking: ESG Pro Limited has a zero-tolerance policy towards modern slavery, servitude, forced or compulsory labour and human trafficking. No worker should be compelled to work through threats, debt bondage, the retention of identity documents or other coercive practices. We expect suppliers and contractors to uphold the same standards and to cooperate with proportionate checks and corrective measures. Further requirements are set out in our Anti-Slavery Policy & Statement.

5.6 Safe and Healthy Workplace: We are committed to providing safe and healthy working conditions for the prevention of work-related injury and ill health. We seek to eliminate hazards and reduce occupational health and safety risks, taking account of remote working arrangements, digital equipment and ergonomics, work-related wellbeing, travel, and activities at client premises. Workers are encouraged to report hazards, incidents and near misses, and to participate in consultation on relevant health and safety matters. We will follow applicable requirements and the arrangements set out in our Health and Safety Policy and integrated management system.

5.7 Child Labour: ESG Pro Limited complies with applicable legislation on the minimum working age and the protection of young persons. We will not employ persons below the applicable minimum legal working age or permit anyone under 18 to carry out hazardous work or prohibited night work. We do not tolerate child labour and expect our suppliers to prevent it in their operations and supply chains.

5.8 Environmental Responsibility and Community Impacts: We recognise that environmental conditions, including climate change, pollution, resource use and ecosystem degradation, may affect the health, safety and wellbeing of

people and communities. Within our environmental management arrangements, we consider the environmental aspects and potential impacts of our activities and services, including travel, digital equipment, purchasing and external providers. We aim to prevent pollution, use resources responsibly, meet applicable compliance obligations and improve our environmental performance where we can exercise control or influence.

5.9 Privacy and Respectful Business Relationships: We respect the privacy, confidentiality and dignity of employees, clients, suppliers and other affected persons. Personal data and sensitive information must be handled in accordance with applicable data protection requirements and Company procedures. Our advice, communications and business decisions should be accurate, professional and considerate of relevant human rights impacts.

6. Human Rights Risk Assessment and Supplier Relationships

We take a risk-based approach to identifying and assessing potential adverse human rights impacts arising from our own activities, procurement and business relationships. The assessment considers the nature of the goods or services provided, supplier location and sector, workforce characteristics, existing safeguards, and any relevant concerns or incidents. The level of due diligence will be proportionate to the risks identified.

Where concerns are identified, we may request information from suppliers or contractors, require proportionate corrective action, review the effectiveness of agreed measures, or reconsider the business relationship where necessary. Human rights and worker safety considerations will also be taken into account in the selection and monitoring of external providers where relevant.

7. Grievance Mechanisms and Remediation

ESG Pro Limited encourages employees, workers, suppliers, contractors and other affected stakeholders to raise any concern about a possible human rights violation at the earliest possible stage. Concerns may be raised with a Line Manager or member of Senior Management, through our Grievance Policy and Procedure, or through the Company's Whistleblowing Policy, as appropriate. Where the concern relates to the usual reporting contact, it may be raised with another uninvolved member of Senior Management.

All concerns will be treated seriously and handled with appropriate confidentiality, fairness and impartiality. Retaliation or detrimental treatment against anyone raising a genuine concern in good faith, or assisting with an investigation, will not be tolerated. Where appropriate, we will investigate allegations, provide protection for those at risk, determine corrective or remedial action, and monitor whether the action taken has been effective.

Where an issue involves suspected modern slavery, serious exploitation or an immediate risk to health and safety, the matter may be escalated promptly and referred to appropriate external authorities or support organisations where required or appropriate. We expect our suppliers and contractors to provide accessible mechanisms for their own workers to report potential human rights violations.

8. Communication, Awareness and Participation

Employees will be made aware of this policy and the reporting channels available to them, including through induction and established internal communication arrangements. Relevant training and information will address respect for human rights, equality and non-discrimination, identifying concerns, and the responsibilities associated with each person's role.

We will support consultation and participation of workers on relevant health and safety risks and working conditions, and encourage employees to raise suggestions for improvement. Human rights expectations will be communicated to relevant suppliers and business partners in a manner proportionate to their activities and associated risks.

9. Targets and Key Performance Indicators (KPIs)

ESG Pro Limited has established the following targets to be achieved by 31 March 2027, to support implementation of this policy and monitor its effectiveness:

- Ensure 100% of employees are informed of this policy and the available grievance and whistleblowing reporting routes, with communication recorded.
- Ensure 100% of employees complete relevant human rights, equality and non-discrimination awareness training, with completion documented.
- Complete at least one documented review of human rights risks across our operations and material supplier relationships, including consideration of remote working, travel and client-site activities.
- Complete documented human rights due diligence for 100% of newly engaged suppliers assessed as higher risk before engagement, and communicate relevant expectations to those suppliers.
- Record and review 100% of reported human rights concerns, investigate credible allegations where appropriate, and document the outcome and any remedial action.
- Assign an owner and due date to 100% of agreed corrective actions arising from human rights concerns, and record follow-up to assess their effectiveness where appropriate.

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- Conduct and document at least one consultation with workers on relevant occupational health and safety risks and working conditions, including any improvement actions identified.

Progress against these targets will be monitored and reviewed annually. Where a target is not achieved, we will record the reasons and agree appropriate corrective or improvement actions.

10. Policy Review

This policy will be reviewed at least annually to ensure that it remains appropriate to the Company's activities, human rights risks, legal requirements and other relevant obligations. The review will also consider concerns raised, consultation with workers, the effectiveness of corrective action, supplier due diligence and progress against the targets and KPIs set out in this policy.

Any changes to this policy will be approved by the Board of Directors. The policy will also be reviewed earlier where significant changes in legislation, Company activities, identified risks or relevant stakeholder concerns require it.

11. Policy Queries

Queries or concerns regarding this policy should be directed to the Management via email at **hj@esgpro.co.uk**.

12. Policy Approval and Endorsement

This policy is subject to approval and endorsement by the Board of Directors and Management. We are committed to upholding its principles across our operations and business relationships.

Following approval, this policy supersedes previous ESG Pro Limited human rights policies.

Formalised and approved by the Board of Directors on **11 November 2026**



Humperdinck Jackman
CEO



Natashia Lee
Managing Director

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Version control

Date issued	Version number	Date reviewed	Summary of changes	Approved
20 July 2024	V1.0	1 August 2024	Initial policy issued.	H. Jackman
20 July 2025	V1.0	1 August 2025	No changes required; policy remains current and unchanged.	H. Jackman
1 August 2026	V2.0	11 November 2026	Updated KPIs; Alignment with ISO standards.	H. Jackman