

Reviewed 19 March 2025

Westbury FM Ltd Environmental, Social and Governance Strategy

What are Environmental, Social & Governance (ESG) Issues?

Growing concerns about social and environmental issues in society as well as more attention being given to corporate governance issues and increasing legal obligations on companies, has led to greater interest in how companies are governed, overseen and should operate to ensure that they carry on their business and behave in a responsible way. Specifically, companies are increasingly expected to consider purpose as well as profit, and the future of our planet and its peoples. All these various issues are collectively referred to as **ESG**.

Each ESG issue is usually placed under one of the following headings: environmental, social and governance issues. Each issue is a discrete area but increasingly they are collectively grouped together and considered under the title, ESG.

ESG issues include, amongst other things, climate change and greenhouse gas emissions; energy efficiency and resource depletion; emissions to air, water and land pollution and waste; health and safety considerations; diversity, inclusion and equal pay; stakeholder and community engagement; bribery and corruption; conflicts of interest and anti-money laundering.

Introduction

Westbury FM Ltd aims to implement the highest environmental, social and governance (ESG) standards appropriate to its size and sector. The prosperity of the Company and of the communities within which it operates requires a commitment by it to the sustainable management of its activities.

Rapidly developing legal and voluntary frameworks, stakeholder demands and increasing environmental concerns, all mean that ESG is fast becoming a top priority for businesses. To keep pace with this change, the Company wishes to:

- keep abreast of the most up to date information available to it;
- understand the risks and opportunities ESG presents; and
- take action to ensure that the Company continues to satisfy stakeholders and places itself in the best position for long term, sustainable development.

It is recognised that a failure to tackle ESG issues that are relevant to the Company may lead to, amongst other things, regulatory enforcement as well as to pose a litigation, physical, commercial, financial and reputational risk to the Company that may adversely affect its sustainability and resilience.

The directors of the Company already have a duty under Section 172 of the Companies Act 2006, to promote its success. This means that each of its directors must act in the way they consider, in good faith, would promote the success of the Company for the benefit of its members as a whole.

However, in addition, the directors have decided to develop a robust and transparent ESG strategy that goes further than this Companies Act duty and affects and enhances all areas of the Company's business in line with ESG issues, namely CO2 footprint, equality, diversity and creating social value to local community.

The Company wishes to adopt this strategy as a framework for how the directors will manage ESG issues relevant to the Company's business.

1) ESG Audit

The Company is a SME and operates in the facilities management, property maintenance sector.

In the first instance, it will carry out a comprehensive ESG audit and material risk assessment across its business to establish:

- what ESG means for the Company;
- which stakeholders should be consulted; and
- an ESG baseline.

Materiality

The Company considers the following to be material to it:

1. Westbury shall ensure a high level of business performance while minimising and effectively managing risk. The company is committed to ensuring that the performance of all staff is regularly reviewed to ensure that individual development needs are identified and addressed. Every member of staff within the company will be appraised whatever job they do.
2. Training – The company is committed to providing training for all employees in order that they can perform their individual jobs effectively and develop relevant skills and in doing so facilitate achievement of the Company objectives.
3. Westbury shall encourage dialogue with local communities for support and mutual benefits.
4. Westbury will register and resolve customer complaints in accordance with our standards of service.
5. Westbury shall operate an equal opportunities policy for all present and potential future employees. The Company will offer our employees clear and fair terms of employment and provide resources to enable their continual development. The Company always considers Flexible working where the nature of the role allows it.
6. Westbury shall maintain a clear and fair employee remuneration policy.
7. The Company shall provide safeguards to ensure that all employees are treated with respect and without sexual, physical, or mental harassment. Whilst the overall management of the Equal Opportunities Policy will rest with the Managing Director it is the personal responsibility of all employees to ensure the practical application of this policy.

8. Westbury FM Ltd has a written statement, which details the company's intent and commitment to Health and Safety. It is the Company's policy to ensure that conditions of work are favourable, healthy, and safe. The wellbeing of all individuals is of prime consideration.
9. Westbury shall uphold the values of honesty, partnership, and fairness in our relationships.
10. The contracts clearly set out the agreed terms, conditions, and the basis of our relationship.
11. Westbury operates in a way that safeguards against unfair business practices.
12. The Company shall encourage suppliers and contractors to adopt responsible business policies and practices for mutual benefit.

Stakeholders

The Company will consult with:

Employees
Suppliers
Contractors
Clients
Accreditations and Government bodies

Baseline

It is important to identify an ESG baseline. The Company shall identify existing policies, processes and practices it already has in place that consider matters closely aligned with ESG.

The following policies, processes and practices are considered relevant:

1. Health & Safety Policy
2. Health & Safety Training Policy
3. Equal Opportunities and Discrimination Policy
4. Working Away and Overnight Policy
5. Carer's leave Policy
6. Working with Sub-contractors Policy and procedure
7. Rewards and Recognition Policy
8. Safety Code Brian initiative/process
9. Company Vehicle Policy and procedure
10. Quality Management Policy and Manual
11. Purchasing Procurement Policy
12. Complaint Procedure
13. Cyber Security Policy
14. Mental Health and Wellbeing arrangements
15. Sales Commission Policy
16. Environmental Management Policy
17. Environmental Aspects and Risk register
18. Risk Management Policy
19. Anti – bribery Policy
20. Data Protection Policy
21. Harassment and Bullying Policy

- 22. Modern Slavery Policy
- 23. Drugs and Alcohol Policy
- 24. PPE and Uniform Policy
- 25. Employee Handbook

These policies will be assessed for their usefulness in relation to ongoing ESG related activity and may also be useful to establish which ESG areas the Company should prioritise and which stakeholders it should consult.

ESG objectives and framework

Having carried out a thorough ESG audit as set out above, the Company will identify its priority areas and set out its ESG objectives. It will implement an ESG framework based on these priorities through new policies, processes and practices relevant to the Company's size and sector.

New ESG Policies

The new policies, processes and practices the Company will implement will include:

An ESG policy which incorporates the Company's priority ESG areas and ESG objectives.

- CO2 Emission and Corporate Carbon footprint Management Policy
- Creating, Measuring and Monitoring Social Value Impact Policy
- Menopause Policy
- Supplier Code of Conduct

The Company aims to achieve the highest standards. It already has robust and transparent legal and professional standards in place but also aims to incorporate relevant ESG considerations into the Directors board's terms of reference. This will include ESG matters becoming a routine consideration in the board's decision-making process.

Updating Existing Policies

The Company has implemented several policies appropriate to its business that consider staff/people, customers, suppliers, health & safety, the environment and the community. To bring these policies in line with the Company's ESG strategy and ESG requirements and its proposed new ESG policy document, it will review and update its policies at least once a year.

Measuring and Reporting

The directors will regularly review, measure and report to stakeholders at suitable intervals on the Company's progress in implementing its ESG strategy and new ESG policies.



Gabriele Dapkuviene
Business Partner