

Westbury FM Ltd Environmental, Social and Governance (“ESG”) Policy Statement

ESG Policy Commitment

This ESG Policy Statement is produced by the Directors of Westbury FM Ltd (“the Company”) pursuant to its ESG Strategy paper dated 19 March 2025.

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

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

(the Company’s “ESG Commitment”).

The ESG Commitment is a fundamental principle of the Company’s business.

Fulfilling the ESG Commitment is the responsibility of the Managing Director and Senior Management of the Company.

General ESG Principles

In fulfilling the ESG Commitment, the Company 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 Company 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.

The Company expects suppliers of goods and services to the Company and contractors working for the Company [and their suppliers and sub-contractors] to adopt and implement the ESG Commitment in their own businesses.

All contractors working on behalf of the Company are expected to

adopt standards fully consistent with those set out in this ESG Policy Statement and to achieve comparable levels of performance.

AND

comply with the Company's Contractor Code of Conduct.

All suppliers to the Company are expected to adopt standards fully consistent with those set out in this ESG Policy Statement and to achieve comparable levels of performance.

OR

comply with the Company's Supplier Code of Conduct.

Environmental

The Company has produced the following objective 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 of environmental audits when required

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 via leakage of liquids gases or solids

Swiftly responding to accidents or incidents that have a potential to threaten the environment, including reporting details of an environmental accident or incident at work to the Senior Management so that they can investigate and take prompt action to make good and avoid recurrence.

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

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

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

Recycling of all packaging materials including cardboard, polystyrene moulds and chippings

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

The Company 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 the Company, its officers and employees, and by those in its goods and services supply chains. In particular, by prohibiting any participation in or connection with any modern slavery, child labour or human trafficking

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 the Company and amongst its supply chain

Ensuring compliance by the Company 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 the Company

Maintaining an inclusive and collaborative workplace where the wellbeing of employees is a high priority

Promoting diversity and inclusion amongst the Company'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 the Company 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 Company's employees

Providing a fair and rewarding remuneration policy and practise linked to business and personal performance

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

Making positive contributions to the community and to charities

Supporting the local community by employing local people where appropriate

Aiming to participate in charity events and social activities in each year

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 the Company itself is able to provide in-house

Conducting employee satisfaction surveys

Ensuring that the Company's services meet all relevant standards of safety and quality for the benefit of its clients and endeavouring to provide customer satisfaction with a view to maintaining a good relationship with them

Engaging local suppliers where appropriate

Paying the Company's suppliers properly and on time

Governance

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

Ensuring that the Company 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 the Company promotes strong oversight and transparency at all levels of its organization

Adopting and maintaining suitable and clear governance structures, including its powers and responsibilities

Ensuring that the Company maintains exemplary management accountability

Ensuring that the Company adopts and implements adequate internal controls, processes, procedures and proactive risk management

The Company 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

The Company 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, code/s of conduct, conflicts of interest, privacy and human resources, as part of the governance structure of the Company

Engaging with stakeholders [regularly] about ESG issues

Ensuring that the Company cultivates strong stakeholder relationships through transparency, open communications and responding to stakeholder input on any issues including ESG issues

Dealing with regulators, tax authorities and auditors and other relevant stakeholders in an open and co-operative manner

Measuring and reporting compliance

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

- metrics and methods for measurement, by the Company, of compliance sufficient to show trends over time and progress against established objectives and any targets; and
- requirements as to reporting to stakeholders at regular intervals not exceeding 12 months on the information derived from that measurement and on disclosures on ESG issues.

The Senior Management will publish to stakeholders all of those written requirements when they are adopted and whenever they are varied.

Status of this ESG Policy Statement

The Managing Director and Senior Management Team endorse this ESG Policy Statement and are fully committed to its implementation.

This ESG Policy Statement will be regularly reviewed and 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 and others to view.

This ESG Policy Statement has been approved & authorised by:

Name: Gabriele Dapkuvienė

Position: Business Partner

Signature:



Dated: 19 March 2025