

Focus Consultants

Environmental, Social and Governance (ESG) Policy



What is ESG?

Our company policy outlines our efforts to work sustainably, responsibly and give back to the society in which we operate. At Focus we strive to function with a strong focus on the environment, supporting others, and investing in our community via our Environmental, Social, and Corporate Governance (ESG) practice, historically referred to and defined in our policies as Corporate and Social responsibility (CSR).

Focus Consultants sets, monitors and reviews ESG performance through defined Key Performance Indicators. These are reviewed annually and updated in line with business objectives and regulatory requirements.

Scope

This policy applies to our company's staff and workers, including Partners. It may also impact on suppliers and subconsultants representing us as we encourage them to share our approach to manage continuity of service and quality for our clients.

Impact

We set annual SMART objectives and plan our corporate Social Value initiatives for the year by targeting actions under the banners of Environment, Society and Governance and logging these centrally. Furthermore, Focus strives to advance our contributions to the UN Sustainability Development Goals through all company policies and activities. Our ESG policy naturally covers the widest scope against these goals, and is designed to primarily contribute to the following goals:



Environmental

As a business we recognise the important part we can play in not only helping our clients but acting as an example of good practice. Focus has long helped clients with energy efficiency, achieving sustainability goals, and reducing their carbon footprint.

Under our ISO 14001 commitment, we have monitored waste, utilities, use of resources, and operational carbon emissions for over 10 years, setting reduction targets and assessing progress.

We refer to our Environmental Policy and Net Zero Carbon statement for details of our Carbon Neutrality Journey plus our annual reports detailing our commitment and progress (this includes a Carbon Reduction Plan available via our website).

We share our progress on this journey via a monthly website CO₂ figure and other online updates, plus advise others via articles and CPD sessions to help improve carbon literacy amongst staff, clients and working partners.

Environmental KPIs

- Annual reduction in operational carbon emissions (tCO₂e) against baseline, to utilise Gold Standard offsetting where appropriate.
- Energy consumption (kWh) intensity measurement and improvement.
- Waste diverted from landfill to exceed 90% (currently at 99%), tracked via supplier portal.
- Reduction impacts from work related travel emissions year-on-year, via car sharing, encouragement of public transport use and planned Staff Electric Vehicle Scheme for 2026. This includes planning Focus socials around public transport infrastructure.
- Target participation in at least 2 environmental volunteering projects each year. (Total 9 logged in last 3-year period).
- Delivery of pro-bono sustainability CPD to clients and working partners.

Social: Internal

At Focus Consultants we are committed to accommodating the needs of diverse stakeholders. We embrace and promote diversity in the workplace, offering our clients a fair representation of our varied local community and the benefits of us by gaining exposure to a wide range of ideas and abilities. Every employee is expected to respect others and treat them with dignity. We will not tolerate harassment or bullying.

When recruiting, our advertising campaigns are checked for inclusivity, and we take steps to facilitate candidate specific reasonable adjustments for interviews. Equality of opportunity is part of the company ethos, with promotion and development opportunity based on merit.

Our structured personal development programme includes 2 yearly Personal Development Reviews. As part of this process individual and company objectives are aligned, and training provision agreed.

We strive towards an inclusive, flexible work model to support our staff and have an in-house Mental Health First Aider plus volunteer support network alongside employee well-being packages.

Social: Community Support

Focus offers assistance for charities, educational establishments and third sector groups, especially those with relevance to our employees. Such interventions include, but are not limited to:

- Volunteering (organised internally or externally), including on paid day release.
- Fundraisers, donations and sponsorships.
- Mentoring, employability workshops.
- Pro-bono work for nonprofit and community organisations.

Our charitable ventures often target sustainability and education, reflecting the priorities of our team.

We possess a strong track record of recruiting young people direct from local education providers which enables the retention of core skills in the local community. We champion professional development to build careers post education and benefit from a Nottingham Trent University Partnership Agreement to support young talent into the workplace, alongside less formal relationships with local colleges and Universities. This is recorded via a TOMS related matrix to measure the social value impact of selected interventions under the agreement.

Social KPIs

- Measured Employee training / CPD hours per person per year, to include:
 - in house Sustainability, Ethics and Anti-bribery, Equality, Diversity and inclusion related training e.g. preventing Sexual Harassment offered to all staff (CPD topics vary month to month),
 - increased level of training for relevant staff and managers via Supply Chain Sustainability School (SCSS) and EMC memberships, covering subjects including neurodiversity and wellbeing.
 - role specific training for managers
- Record Employee engagement / satisfaction levels (via periodic surveys, semi-annual appraisals and quarterly Staff Engagement Meetings)
- Diversity metrics across recruitment, retention and promotion are recorded via our administration system and we have reported using SCSS Annual Benchmarking Diversity Survey since 2024. Notable areas of increase:
 - Staff from minoritised ethnic groups increased by 50% in the last year.
 - under 30s increased nearly 20% and over 55s increased by 50% in 12 months
 - Female staff rose in the same period from 41% to 50% of our workforce.
 - 11% of current staff now have declared a disability or long-term condition.
- Central records held for social value initiatives delivered (includes volunteering hours, community engagement activities, charity events and donations, apprenticeships and work placements.) Currently, 3 apprenticeships are ongoing/complete in the current year.

Governance: Business Ethics

We want to be a responsible business demonstrating appropriate standards of professionalism. Positive actions begin 'at home'. Our company will:

- Respect and uphold the relevant laws and regulations including:
 - Environmental Protection Act 1990
 - Equality Act 2010
 - Modern Slavery Act 2015
 - Bribery Act 2010
 - Immigration, Asylum and Nationality Act 2006
 - Health and Safety at Work Act 1974
- Implement internal policies to follow best practice and offer staff guidance on contents
- Include staff in feedback loops and decision making to continuously improve the way we operate

We conduct business with integrity and promote respect and fair dealing for customers and other stakeholders. We'll ensure that our activities do not directly or indirectly violate human rights. We are committed to continuously improving our employment practice throughout our supply chain, ensuring that we:

- Take all reasonable steps to protect the health and safety of our employees.
- Avoid business operations negatively impacting the lives of local population.
- Promote and train anti-bribery and anti-corruption practices in line with RICS ethics standards.
- Actively invest in staff development and internal promotion.
- Support diversity and inclusion and adopt fair employment practices in the hiring, reward and advancement of our employees.

Everyone should have access to quality employment, with a healthy work culture and to feel heard in company decision making. We undertake benchmarking to test remuneration against the market.

Governance KPIs

- Mandatory compliance training (e.g. anti-bribery, ethics): delivered, monitored and followed up to ensure as close to 100% attendance as practicable, as relevant by role. Attendance logged centrally.
- Year on year increased investment in staff development and training.
- Monitor centrally any reported ethical breaches and resolution outcomes
- Audit and review relevant risk assessments, CPD content and completion against planned schedule per ISO 9001 protocols.
- Target 70% of supply chain spend kept local, prioritising SME partners.

Modern Slavery and Ethical Compliance

A relevant organisation under Section 54 of the UK Modern Slavery Act 2015 is any commercial entity (body corporate or partnership) that supplies goods or services, operates in the UK, and has a total annual turnover of £36 million or more. These organisations must publish an annual slavery and human trafficking statement. We are an SME and therefore not considered a relevant organisation.

However, Focus Consultants operates a zero-tolerance approach to modern slavery, forced labour and human trafficking and has a published statement to this end. We undertake relevant checks to validate the Right to Work in the UK and identity of candidates at the recruitment stage and adhere to minimum wage requirements. Staff attend regular CPD modules including business ethics, recognising financial crime red flags and highlighting malpractice, reported handled via the Operations Manager under our confidential procedures, including Whistleblowing as appropriate.

We expect the same high standards from our supply chain. Suppliers are required to take steps to identify and mitigate applicable risks, report breaches and align their policy and protocols with our own.

Implementation, Responsibilities and Performance Monitoring

Under our ISO9001 and 14001 certified processes, ESG performance is monitored and reviewed through ongoing internal data collection and reporting systems.

To ensure effective delivery of this ESG Policy, Focus Consultants has established clear responsibilities, measurable performance indicators, and monitoring processes. Overall accountability for ESG performance sits with the Managing Partner. Day-to-day implementation is supported across the business as follows:

Managing Partner:

- Provides strategic oversight of ESG commitments
- Reviews ESG performance and approves annual objectives and KPIs
- Instructs updates to related policies and procedures under continuous improvement protocols and in response to regulatory or organisational change
- Drives decision making for new initiatives or any steps to tackle underperformance
- Ensures adequate resources are in place to manage and monitor performance and compliance.

Senior Management Team:

- Lead implementation of ESG initiatives within their teams
- Track industry standards and best practice applicable across our divisions
- Monitor compliance with ESG-related policies and procedures specific to their department
- Promote a culture of ethical, sustainable and socially responsible working, via engagement with employees, clients and supply chain partners.

HR / ESG / Sustainability nominated responsible person (Operations Manager):

- Co-ordinates ESG objectives, data collection and reporting
- Supports delivery of social value initiatives
- Maintains alignment with ISO 14001 and Carbon reduction commitments
- Monitors environmental performance including carbon reduction targets
- Oversees equality, diversity and inclusion practices
- Manages maintenance of training records and staff development programmes
- Supports Health and Safety/wellbeing initiatives and internal engagement
- Act as main conduit between the board and operational teams in delivery, monitoring and feedback mechanisms.

All Employees:

- Are responsible for complying with this policy and related procedures
- Contribute to ESG objectives through day-to-day activities
- Report any concerns via an appropriate Manager, including formal whistleblowing via our prescribed procedure.

Supply Chain Compliance and Responsible Procurement

Focus Consultants recognises the importance of working with a responsible and ethical supply chain that aligns with our ESG commitments. To ensure that our suppliers, sub-consultants and business partners operate in a manner consistent with our standards, we undertake proportionate due diligence when selecting and onboarding suppliers. This includes:

- Pre-qualification assessments to evaluate competence, financial stability and ESG performance
- Review of relevant policies and past performance
- Risk-based assessment of suppliers regards increased exposure to environmental, ethical or labour risks
- Checks on previous compliance with legal and regulatory requirements, specifically including with those listed above at page 2
- Evidence of ethical business practices, including anti-bribery and anti-corruption principles
- Evidence of commitment to environmental responsibility, including reducing waste and carbon emissions where practicable
- Checks on safe and healthy working practices affecting their employees
- Evidence they support equality, diversity and inclusion within their workforce
- Where appropriate, we obtain copies of relevant policies, certifications or procedures (e.g. Environmental, Health and Safety, Modern Slavery, Equality and Diversity).

We work collaboratively with our suppliers to improve ESG performance across our supply chain by promoting awareness, encouraging adoption of best practice / industry standards and supporting them in appropriate improvement. We monitor their performance under our ISO9001 compliance process to ensure continued compliance via:

- Periodic review of supplier performance and feedback
- Evaluation of delivery against agreed standards and contractual requirements
- Requesting updated documentation and evidence at least annually or where necessary
- Addressing any identified non-conformance or areas for improvement
- Where necessary, corrective actions will be agreed. Failure to meet required standards may result in termination of the relationship.

Record Keeping: Monitoring, Reporting and Review

Our records include a range of ESG specific reports including Carbon management data, staff training logs, supplier assessments and questionnaire responses and similar are made available for audit where required under ISO 9001 and 14001 protocols.

Under these certifications, progress against our pre-set objectives is reviewed at least annually by senior management, with interim reviews where appropriate. Outcomes are used to inform future objectives, drive continuous improvement and tackle any underperformance. We are committed to the continual improvement of our ESG performance. To this end we undertake:

- Regular reviews of objectives and KPIs
- Tracking industry standards and best practice
- Engagement with employees, clients and supply chain partners
- Policy updates and procedures in response to regulatory or organisational change.

Internal reports are fed to the board quarterly and annual reports such as our Carbon Reduction Report and Plan completed and published annually.

Our ESG risk assessment covers a wide range of target areas across areas relevant to our business, with proportionate action to the size and complexity of our business. Risk and prioritisation ratings are applied to each to focus our efforts on monitoring, management and mitigation accordingly. This is reviewed and improved within our ISO9001 and 14001 annual review cycle, with additional updates mid-term where appropriate due to change in regulatory regime, market -specific good practice and company Policy. To ensure consistency, transparency, and measurable outcomes, we follow our documented Social Value Delivery Process, which outlines the structured approach for identifying community needs, engaging stakeholders, implementing targeted initiatives, and monitoring social impact. Outcomes are logged for sharing with the board and decision-making regards priorities and target areas year on year.

Related Policies

- Anti-Bribery
- Anti Money Laundering and Terrorist Finance
- Ethics and Employee Code of Conduct
- Environmental and Sustainability
- Equality, Diversity and Inclusion
- Volunteering Policy and Procedure
- Training and Development
- Net Zero Carbon Statement
- Modern Slavery Statement
- Whistleblowing

(This list is not exhaustive)

Monitoring

Overall responsibility for policy implementation, monitoring and review lies with Partners. The policy will be reviewed at least annually in line with our ISO9001 quality procedures.



For Focus Consultants 2010 LLP
Jason Redfearn BSc (Hons) MRICS
Managing Partner
August 2026