

# ESG Committee Report

"We have made good headway on delivering against our focus areas and have strong momentum going into 2024."

Lisa Fretwell, Chair of ESG Committee



On behalf of the Board, I am pleased to report on the progress of the Group's ESG strategy for 2023. We have made good headway on delivering against our focus areas and have strong momentum going into 2024. During 2023, we have focused primarily on our climate action journey and on the health, safety, and wellbeing of our people, both of which are considered to be principal risks to Restore. Throughout this report, you will see how our thinking in these areas has evolved and matured over the year, including how we plan to address these areas, plus other key strategic topics, in 2024 and beyond.

## Governance of ESG

In January 2023, a Board level ESG Committee was established which is chaired by me as an Independent Non-Executive Director and attended by other Non-Executive and Executive Directors. This Committee formally reviews and challenges the ESG strategy, holds management to account for delivery of committed execution plans and signs off ESG disclosures and assurance. The Terms of Reference are available on our website.

Key agenda items for the ESG committee in 2023 have been:

- › review of the overall ESG strategy, including 2023 priorities and reporting requirements;
- › assessment of the ESG analysts' ratings of the Group;
- › review of 2023 progress and 2024 priorities for each focus area in the ESG strategy;
- › deep dive into the Group's net zero commitments and ambitions; and
- › preliminary review of the level of compliance the Group will achieve in its 2023 TCFD reporting.



## ESG Strategy

We are working with our customers and suppliers to deliver a secure and sustainable business future, focusing on Our Planet, Our People and Our Business. Our strategy, and its constituent parts, were derived following a materiality assessment conducted in previous years, whereby a broad set of stakeholders were surveyed to derive consensus on the main ESG issues the Group faces. We have been executing against this assessment and strategy since 2021 and will look to refresh this materiality assessment in 2024 to ensure that the strategy remains pertinent.



## KPIs

The KPIs below represent the measures that we will use to track progress against our "Restoring our World" strategy for the foreseeable future. During the year, we have made progress in refining and distilling the information that we need to see to enable us to understand our strategic progress, therefore there have been some changes to the measures presented when compared to prior years. We understand the importance of consistency in KPI reporting and will continue to report the measures below going forward.

	2023	2022	2021
<b>Our Planet</b>			
Intensity ratio (Scope 1, 2 and 3 market-based emissions per £m of revenue)	33.3	41.3	Not measured
% of hybrid/EV vehicles in total fleet	17%	3%	Not measured
% of sites which have REGO backed electricity contracts	86%	85%	Not measured
% of hybrid/EV company cars in total car fleet	91%	63%	Not measured
<b>Our People</b>			
Women in management roles	33%	33%	33%
Women on the Board	40%	50%	40%
Women across the business	34%	34%	33%
Employee engagement	New KPI being derived	70%	61%
Near miss reporting (number reported)	80	130	57
<b>Our Business</b>			
Customer NPS (average)*	81	78	72
Trustpilot rating (average)*	4.6/5.0	4.6/5.0	4.6/5.0
Planet Mark certification	100%	100%	100%

\* relevant businesses are Harrow Green and Datashred for NPS (2021 just Datashred) and Datashred and Records Management for Trustpilot scores

### Strategic progress



#### Our Planet

##### 2023 Progress:

###### Climate Action:

- › Development of a net zero roadmap with near-term and long-term targets and milestones (refer to pages 32 to 34)
- › Improvement of 19.4% in our total market-based intensity ratio (refer to pages 34 to 35) and a reduction of scope 1 and 2 emissions (market-based) of 20.1%.
- › 86% of our sites now have procured electricity which is Renewable Energy Guarantees of Origin ("REGO") backed.
- › Solar panels implemented on our site in Coventry.
- › Enhancement of the supplier approval and onboarding process in Dashdred to include key sustainability criteria

###### Resource Use:

- › Fleet decarbonisation plan in progress:
  - 91% of company cars now EV or hybrid (2022: 63%)
  - 17% of total fleet now EV or hybrid (2022: 3%)
- › Ongoing improvements made to our estate to improve the way we consume energy e.g. focus on lighting reduction programme, phased installation of EV chargers where possible and implementation of energy saving initiatives.

###### Biodiversity:

- › Working with a number of our Digital customers to mutually improve biodiversity around our sites including planning to install elements such as hedgehog gates and homes, bird boxes, pollinator habitats and plant wildflowers in 2024.
- › To improve air quality we have implemented an anti-idling policy on a number of our sites for both internal and external transport.
- › Wildflowers planted in our Harrow Green business, with a focus on flowers that encourage butterflies, bees and moths.



#### Our People

##### 2023 Progress:

###### Health, Safety and Wellbeing:

- › Established "Wellbeing House" – a new operating model for how we will support colleagues with wellbeing – covering financial, social, physical and mental wellbeing concerns.
- › Conducted extensive analysis into underlying trends on absence and mental health-related matters to help inform our safety and wellbeing strategies.
- › Introduced Mental Health First Aiders including support mechanisms for them personally and tracking of cases.
- › Further development of the Employee Assistance Programme with a heavy promotion of services available. We saw usage increase by 600% in the second half of this year.
- › Introduced a new suite of KPIs to cover lagging and leading indications for safety and wellbeing that will be tracked monthly.

###### Culture:

- › Through colleague focused working groups, we established a Group-wide vision on culture.
- › Performed a review of all existing colleagues' policies to ensure they were easily understood and suitably supportive where appropriate.
- › Launched a Group-wide Code of Conduct.

###### Community Impact:

Each of our businesses has been actively engaged in the community, examples include:

- › In Records Management we have connected with a Remploy Working Well Specialist Employment and Recruitment Service to understand how their recruitment services can support and enable our objectives to adopt inclusive employment and recruitment processes.
- › We have continued to support and donate to a number of charities including the Mission Christmas Cash for Kids charity, Barnardos, Crisis, Comic Relief and Save the Children
- › Through our Harrow Green business we have donated furniture from relocations to several different charities which are then sold to raise funds.

###### Enriching Careers and People's lives:

- › Rolled out leadership development training across all senior leaders and all functional leaders.
- › Rolled-out a Group-wide performance development tool which has the option to be used by the businesses.
- › Consolidated 15 pension providers to one, driving education around pension and retirement planning and making salary sacrifice available to all eligible colleagues so they can benefit from this provision.

###### Diversity and Inclusion:

- › Defined diversity categories in line with ONS and embedded capture processes for potential candidates and new recruits.
- › Rolled out the "This is Me" campaign. This was a Group-wide promotion of the topic of Diversity, Equity, Inclusion and Belonging (together, "DEIB"), followed by a data collation campaign to support our position resulting in c60% of colleagues self-identifying and recording their diversity characteristics.
- › Established several valuable Colleagues Networks – including networks for LGBTQ+, Armed Forces, Ethnic Minorities.





## Our Business

### 2023 Progress:

#### Customer Engagement:

- › High Trustpilot and NPS scores across our businesses (where used):  
NPS scores:
  - Datashred – 76
  - Harrow Green – 87Trustpilot scores:
  - Records Management 4.5
  - Datashred – 4.7
- › Achieved all major ISO 9001, 14001, 22301, 27001, 45001, and BS 10008 compliance certifications where directly relevant to the business.

#### Data Security:

- › The Group IT strategy is in line with NCSC Cyber Security Guidelines with Cyber Essential Plus certifications achieved across all businesses.
- › Disaster recovery and business continuity plans are in place and tested for each site and as required for the Group's IT platforms.
- › Comprehensive cyber insurance in place in the Group's Digital and Technology businesses, where the risk is deemed to be the most prevalent.

#### Innovation:

- › Awarded the "Project of the Year – Public Sector" at The Document Manager Awards and "The Innovation Award" at the Public Sector Alliance Awards in recognition of our unique approach and solution in helping one of our customers optimise and streamline the 28.5 million files that they held within their own storage facility.

#### Partnerships:

- › Partnered with Barnardos over the last two years to provide fundraising, donations, volunteering, and sponsorship of events.
- › Continued our partnership with PlanetMark to assess and assure our ESG data, metrics, and strategy.
- › Partnered with an electricity provider who is able to provide us with 100% REGO-backed electricity contracts.

#### Transparency and Accountability:

- › Formation of a Board-level ESG Committee to enhance governance and ensure, that all Board Committee Terms of Reference have been reviewed and revised where appropriate.
- › Cross-business Property Committee established to provide a more regular and focused review of the Group's real estate strategy with regular updates to the Board.
- › New Share Dealing Code and Information Disclosure Policy rolled out.
- › Detailed review of the whistleblowing policy and procedures.

## Our ESG Priorities and Plans in 2024 are to:

### Our Planet

- › Operationalise our net zero roadmap through the introduction of an ESG Operational committee which incorporates ESG champions plus senior stakeholders from each business and from the fleet and facilities teams. The aim of the Group will be to drive actions in the businesses to meet the Group's targets and commitments.
- › Increase the frequency of our carbon reporting from annually to quarterly. This will allow us track progress against our interim net zero targets.
- › Complete the quantification of our Scope 3 baseline, ensuring that the remaining relevant emissions are assessed, and a plan is in place to track reporting of those.
- › Develop further commitments in relation to waste and biodiversity to align with the focus of "Our Planet" strategy.
- › Review the culture of the Group to ensure that our ambitions in this area are integrated with business priorities. We will start this journey by looking at carbon-related incentivisation and developing a training and awareness programme that can be rolled out to the Group.

### Our People

- › Continue to improve data quality in health, safety, and wellbeing to enhance our understanding of the root causes of incidents alongside the appropriate corrective action.
- › Review the technology and systems in place underpinning the key social commitments to ensure they are appropriate and fit for purpose.
- › Look to implement a new Group-wide learning management system with content focusing on health, safety and wellbeing, compliance, diversity and inclusion and leadership.
- › Continue enhancing the wellbeing commitment with the establishment of a Wellbeing Committee alongside further support for the Employee Assistance programme and the mental health first aiders initiative.

### Our Business

- › Publish a Supplier Code of Conduct which focuses on the compliance, ethical and governance expectations we place on our supply chain.
- › Review and update existing supplier terms and conditions and create new framework supplier contracts for use by the businesses. These will cover third party compliance requirements, audit rights for the Group and provision of key ESG metrics to support our ESG strategy.



### Net zero journey

In 2021, we published our ESG strategy "Restoring our World", which included a commitment under "Our Planet" to lighten our footprint by becoming a net zero organisation by 2035. As a Group we remain deeply committed to our climate-related ambitions and understand that each action we take has the potential to propel us towards our net zero future.

Since making these commitments in the shadow of COP26 we have been working hard behind the scenes to start delivering against these targets. Like every responsible business, this has involved looking into every area of the Group to better understand our emissions sources, development of a governance structure to oversee progress against our targets, data capture and measurement, and synthesis of current initiatives. All this while exploring the ever-evolving landscape of sustainability definitions and frameworks.

In light of the launch of the SBTi Corporate Net Zero Standard in late 2021, we now have a formal framework for corporate net zero target setting. This has given us the necessary structure and a clear, consistent methodology to align our targets to the 1.5-degree pathway. From this, we now know that our original net zero targets were not broad enough in scope, and we will need to work hard to navigate our supply chain emissions in addition to those actively under our direct operational control.

We remain committed to 2035 as a long-term target for our Scope 1 and 2 emissions, as outlined in our "Restoring our World" strategy. To realistically achieve full decarbonisation of our full value chain, however, we are adjusting our net zero target to 2050, in line with UK legislation. Without question, our ambition to beat this goal remains valid, but we must acknowledge that no organisation can achieve net zero alone and instead we must act as a catalyst for action and urgency.

### Roadmap to net zero

**Restore will achieve net zero by reducing absolute Scope 1, 2, and 3 emissions by 90%, from a 2022 baseline, by the following target years:**

- › Scope 1 and 2: 2035
- › Scope 3: 2050.

**These long-term commitments are supported by near-term targets:**

- › to reduce Scope 1 and 2 emissions by at least 50% by 2030; and
- › to ensure that by 2030, suppliers covering 70% of emissions from Purchased Goods and Services have set net zero targets aligned with a 1.5°C pathway.

To facilitate our 2050 net zero target, we will put in place a comprehensive decarbonisation roadmap to be delivered by each individual business and supported by strong governance within the Group.

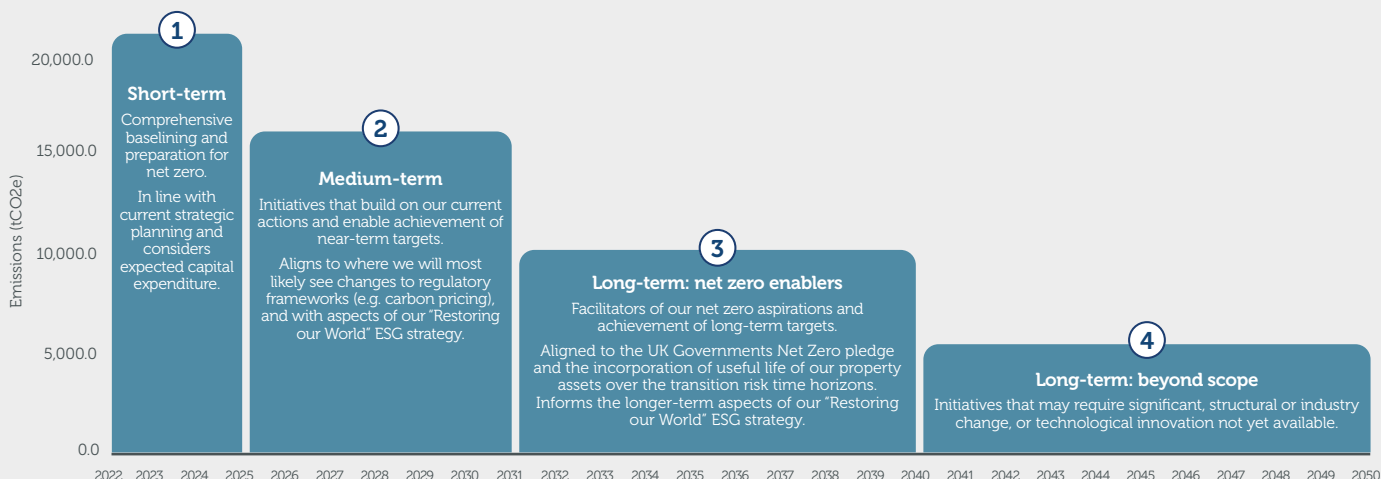
While a full baseline carbon footprint has not yet been established, we have engaged with a third-party to establish an initial set of actions to be completed along this roadmap. These actions are based on the outcomes of carbon footprint data analysis and a stakeholder questionnaire sent out to representatives of the businesses.

The actions aim to provide a comprehensive programme of decarbonisation, acknowledging that not all actions deliver direct carbon reduction initially, but are required to support a data led culture of decarbonisation and establish some essential foundations for future carbon savings.

This roadmap will be integrated into our governance framework to ensure accountability and rigour in reporting. It is essential that as a Group we embed sustainability considerations into our decision-making processes, and our commitment to net zero will be reflected in Board oversight, executive compensation, and risk management practices.

The roadmap is broken down into four time horizons with the associated focus areas as set out below.

### Path to net zero – Time horizons







## Overview of the actions required for decarbonisation

To deliver the necessary carbon reductions over the time horizons stated on the previous page and across both our internal operations and wider value chain, we will deploy initiatives across three key activation levers:

- › Measurement, data quality, and target setting
- › Education, engagement, and communications
- › Key decarbonisation initiatives and policies

We have set out below the key actions we have identified, along with their likely timeframes, necessary for our decarbonisation roadmap to net zero.

### Solutions for decarbonisation overview

	Measurement, data quality, and target setting	Education, engagement, and communications	Key decarbonisation initiatives and policies
<b>1</b> Short-term (2022 - 2025)	Explore opportunities for installing HHD (Half Hourly Data) smart meters.  Measurement of full Scope 1, 2, 3 baseline carbon footprint.	Initiated supplier engagement activities with top suppliers.  Create ESG Operational Committee across all business units.	Full review of Energy savings opportunities from ESOS Phase 3.  Develop a comprehensive fleet decarbonisation roadmap for current fleet projections.  Secure 100% clean energy supply for all sites.  Formalise supplier review process.
<b>2</b> Medium-term (2026 - 2031)	Conduct further building audits across the portfolio.  Work with key suppliers to provide list products, quantities, and emissions per product.	Conduct comprehensive supply chain review and net zero engagement.  Comprehensive employee training and on board for net zero education.	Improve building fabric where feasible.  Look at creating EV charging strategy across the estate ahead of EV transition.  Continue to replace all old lighting for LED in areas not yet converted.  Create a Sustainable Procurement Policy and Supplier Code of Conduct.
<b>3</b> Long-term enablers (2032 - 2040)	Implement smart carbon data collection solutions embedded into finance systems.  Continuous and transparent review of targets, actions, and processes.	Full compliance with policies and net zero supplier requirements.  Net Zero action plans with key suppliers.	New sites to have net zero embedded as standard.  Explore long term leases where feasible to enable decision making based on ROIs.  Explore Hub & Spoke, rather than local delivery model.  Explore large scale ground mount solar installations.
<b>4</b> Long-term beyond scope (2041 - 2050)	Ongoing measurement, maximising data quality considerations, annual target setting and progress reporting, all monitored by strong governance.	Development of leadership across the whole value chain and ongoing compliance with cross sector regulation and legislation.	Decarbonisation of key supporting industries. Utilising policy adoption and implementation of technological innovation where available.

## Case Study

# Installation of solar panels in Coventry

The Records Management team have our "Restoring the World" strategy at the heart of their operations and in August 2023, installed solar panels onto the roof of their site in Coventry. This will not only allow the site to generate its own renewable power, thereby reducing carbon emissions, but should also be a cost-effective solution, ultimately decreasing the cost base of the site.

The installation included 7 strings of 36 panels and is already delivering excellent output. The system will produce 75.7MWh/year (75,700kWh) with a saving of approximately 14.64 tonnes of carbon dioxide, the equivalent of planting 672 trees.

Safety is also at the heart of this installation; in case of an emergency situation, i.e. if the AC power system fails or a fire accident occurs, the system automatically shuts itself down by powering down the input DC energy all the way to the panels on the roof.

This is a fantastic blueprint for future potential installations and takes the number of sites in the Group with solar panels to two.

### Solutions overview

**Scope 1** – Fleet provides the most significant contribution to the Group's Scope 1 footprint at c56% of total location-based assumptions. A comprehensive roadmap to full decarbonisation of the entire fleet portfolio is the main priority whilst accepting that the current state of EV technology is not yet sufficient for Restore to transfer to an all-electric fleet due to availability, battery range, charging infrastructure and cost.

**Scope 2** – To reduce Scope 2 market-based emissions it is essential that the Group look to secure a 100% REGO backed clean energy supply for all sites. This should be combined with exploring all opportunities to maximise onsite renewable energy generation via solar PV.

**Scope 3** – As expected, a significant proportion of our overall measured emissions are attributed to Scope 3 Category 1 Purchased Goods and Services. It is essential that in the short and medium term we look to initiate comprehensive supplier engagement through education and outreach. Our near-term targets are designed to prioritise supply chain engagement and initiate a cascade of decarbonisation through the industry. It is then expected that later in our net zero journey we will start to realise carbon savings from our suppliers within our own emissions portfolio.

Beyond specific initiatives with high potential carbon savings, it will only be possible to reach net zero by catalysing behavioural change across the whole Group and encouraging the team to adopt a net zero mindset.

### Outlook

This pathway to net zero sets out the next chapter of our sustainability journey, and our robust commitment to our net zero target. We have already started to implement carbon reduction measures across the Group, but like most businesses in our industry, we have a complex ecosystem that will require consolidated action to decarbonise. Making sustainability an integral part of the organisation will help to unlock our potential and ensure that we are fit for the future.

The path to net zero requires immediate action, innovative solutions and transformative change. To deliver against these net zero targets, therefore, we will be working to ensure all available carbon reduction opportunities and initiatives are embedded across our businesses. We have a strong foundation of sustainable action across the organisation and are culturally well placed to build upon this but must unify across the businesses to maximise impact.

We are confident that our net zero commitments are well aligned with our business strategy, and we are prepared to invest in making a net zero future the reality for Restore. During 2024, we will be working with the businesses to quantify the investment needed to achieve our commitments, where it is practicable. This will allow us to ensure that the financial impact from meeting our net zero commitments is known and factored into our overall strategy and financial planning.

As part of our ongoing commitment to transparent and comprehensive reporting, our baseline and net zero targets will be reviewed for relevance on an annual basis as part of Net Zero Governance.\*

### 2023 carbon emissions

In line with best practice, we are pleased to set out our Global Green House Gas ("GHG") emissions report on the next page. The GHG data relates to emissions during the 12-month period from 1 January to 31 December 2023, and 100% of our emissions are UK based. Our carbon footprint is calculated using methodologies consistent with the GHG Protocol with additional guidance notes included as required and has been certified by a third-party as being compliant with the Streamlines Energy and Carbon Reporting guidelines.

#### Location-based emissions (reflects the average emissions intensity of grids on which energy consumption occurs)

Total emissions reduced by 9.2% from 2022, with a reduction of 1,306 tCO<sub>2</sub>e. Emissions from our fleet are the most significant driver of our carbon performance, comprising c56% of total emissions, and these emissions reduced by 12.8% from 2022 following the gradual replacement of our smaller fleet vehicles with electric/hybrid alternatives. Overall, 17% of our fleet is now either electric or hybrid, an increase from 3% in 2022, with 91% of our company cars now using lower-carbon technology.

#### Market-based emissions (reflects emissions from electricity that companies have purposefully chosen)

Total emissions have fallen by 20.0% from 2022, with a reduction of 2,306 tCO<sub>2</sub>e. The reduction is driven by the same factors as the location-based emissions above but in addition the Group continues to take action to seek sustainably sourced energy and make strategic steps towards a non-fossil fuelled fleet. The Group is proud to report that 86% of Restore's sites have procured electricity supplied through REGO backed suppliers (2022: 85%) and where Restore does not manage that supply directly, for example where a landlord manages power supply, the Group is actively negotiating for that energy supply to transition to a renewable alternative. We are expecting 100% of our directly procured electricity to be supplied by REGO backed suppliers directly by Q2 2024.

#### Intensity ratios

In line with lower emissions, our market-based intensity ratio has reduced to 33.3 from 41.3 driven by the factors above.

\*In line with the SBTi Corporate Net Zero Standard, companies are required to check targets annually and at minimum review them every five years. If necessary, companies must recalculate their target to reflect significant changes that might compromise the target. Recalculation should not be triggered by organic growth but should be triggered by significant changes in company structure / operation (e.g., Mergers / Acquisitions), in methodology used for calculating the base year inventory (e.g., improved emissions factors, improved data quality), and in the occurrence of significant errors.



## Streamlined Energy and Carbon Reporting ("SECR")

The Group has continued to make good progress in 2023 on improving our data collection, data coverage and data quality.

In line with prior year, we have included market-based reporting as well as location-based reporting to demonstrate how our procurement approach prioritises renewable energy sources when acquired business energy contracts expire.

tCO2e	2023	2022	2021
Fleet fuel emissions	7,222.6	8,281.0	8,013.8
Natural Gas	509.0	412.4	499.7
Heating fuels	121.9	153.6	142.5
<b>Total Scope 1<sup>1</sup></b>	<b>7,853.5</b>	<b>8,847.0</b>	<b>8,656.0</b>
Electricity	3,824.2	3,841.8	3,719.4
<b>Total Scope 2 location-based<sup>2</sup></b>	<b>3,824.2</b>	<b>3,841.8</b>	<b>3,719.4</b>
Electricity	137.1	1,154.3	Not measured
<b>Total Scope 2 market-based<sup>2</sup></b>	<b>137.1</b>	<b>1,154.3</b>	<b>Not measured</b>
<b>Total Scope 1 &amp; 2 location-based</b>	<b>11,677.7</b>	<b>12,688.8</b>	<b>12,375.4</b>
<b>Total Scope 1 &amp; 2 market-based</b>	<b>7,990.6</b>	<b>10,001.3</b>	<b>Not measured</b>
Transmission and distribution losses	330.5	351.4	329.1
Business travel	443.0	397.8	223.7
Waste	404.1	731.5	671.7
Water	13.2	13.4	12.6
Procurement	37.6	29.1	31.1
<b>Total Scope 3<sup>3</sup></b>	<b>1,228.4</b>	<b>1,523.2</b>	<b>1,268.2</b>
<b>Total Scope 1, 2 &amp; 3 location-based</b>	<b>12,906.1</b>	<b>14,212.0</b>	<b>13,643.6</b>
<b>Total Scope 1, 2 &amp; 3 market-based</b>	<b>9,219.0</b>	<b>11,524.5</b>	<b>Not measured</b>

## Intensity measures

In line with previous years, management provides an intensity measure for carbon usage based on revenue and headcount in order to correlate emissions with levels of activity in the Group.

tCO2e	2023	2022	2021
<b>Intensity measure (per £'m revenue)</b>			
Group revenue (£'m)	277.1	279.0	234.3
Scope 1, 2 & 3 location-based emissions per £'m revenue	46.6 (-8.4%)	50.9 (-12.5%)	58.2
Scope 1, 2 & 3 market-based emissions per £'m revenue	33.3 (-19.4%)	41.3	Not measured
<b>Intensity measure (per employee)</b>			
Average headcount (FTE)	2,727	2,892	2,450
Scope 1, 2 & 3 location-based emissions per employee	4.7 (-4.0%)	4.9 (-12.5%)	5.6
Scope 1, 2 & 3 market-based emissions per employee	3.4 (-15.0%)	4.0	Not measured

## Energy consumption

The tables represent 100% of our business energy use, a breakdown of emissions by fuel type is provided below.

kWh	2023	2022	2021
Gas oil	253,283.9	290,951.3	261,478.6
Natural gas	2,782,374.3	2,259,222.0	2,728,074.5
Propane	52,432.5	80,272.7	42,456.4
LPG	87,121.1	8,269.8	1,378.3
Diesel (buildings)	41,522.9	76,509.5	–
Burning oil	34,226.9	126,909.2	234,725.3
Fleet	28,466,985.1	32,312,398.7	31,654,732.0
Grey fleet	1,426,441.7	1,536,848.4	898,883.8
Electricity	18,492,891.0	19,894,303.8	17,542,844.9
<b>Total energy consumption<sup>4</sup></b>	<b>51,637,279.4</b>	<b>56,585,685.4</b>	<b>53,364,573.8</b>

1 Scope 1 (direct) – measures which relate to emissions resulting from activities owned or controlled by Restore.

2 Scope 2 (energy indirect) – emissions are those released into the atmosphere that are associated with the Group's consumption of purchased electricity, heat, steam and cooling. These indirect emissions are a consequence of the Group's energy use but occur at sources the Group does not own a control.

3 Scope 3 (other direct) – emissions are a consequence of the Group's actions that occur at sources that the Group does not own or control and are not classed as Scope 2 emissions.

4 Energy consumption data is captured through utility billing meter reads or estimates.



### Task Force on Climate-related Financial Disclosures ("TCFD")

This is our third year of reporting climate-related disclosures, in line with the TCFD recommendations and in recognition of The Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022. These are consistent with the TCFD Recommendations and Recommended Disclosures as detailed in "Recommendations of the Task Force on Climate-related Financial Disclosures", 2021, with use of additional guidance from "Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures", 2021.

The TCFD disclosures also address section 414CB (2A) Companies Act requirements in relation to climate-related disclosures. Adherence to the relevant parts of these requirements is set out on page 41. The Group has continued to use the TCFD framework to structure our reporting in this area to ensure consistency with previous years, however we will continue to map our TCFD disclosures to the relevant sections of the Companies Act framework going forward.

### Governance

#### Board and the ESG Committee

The Board maintains overall responsibility and oversight of climate-related risks and opportunities, ensuring alignment with Group vision and direction. However, to ensure there is the appropriate strategic and operational focus on climate-related matters, the Board established a formal ESG Committee in January 2023. This is a Board-level Committee that is chaired by Lisa Fretwell, a Non-Executive Director and attended by other Non-Executive and Executive Directors. Whilst this Committee covers all environmental, social and governance matters, it is acutely responsible for oversight and challenge of our climate strategy; holding management to account for execution of the strategy, ensuring our climate reporting meets regulatory requirements and ensuring that the Group's approach to climate-related risks and opportunities is balanced, measured and appropriate for our business.

Key climate-related agenda items for the ESG committee in 2023 have been:

- › review of the overall climate-related strategy, including 2023 priorities and reporting requirements;
- › assessment of the ESG analysts ratings of the Group;
- › review of 2023 progress and 2024 priorities for each focus area in the ESG strategy, including climate-related matters;
- › deep dive into the Group's net zero commitments and ambitions; and
- › preliminary review of the level of compliance the Group will achieve in its TCFD reporting.

The Board and the ESG Committee is supported by the Risk Committee in the oversight of climate-related risks, and for the overall effectiveness of risk management arrangements. The climate-related risk register is reviewed as part of the enterprise-wide risk framework assessment every six months which enables management to incorporate ongoing refinement and quantification of risks.

The Board continues to ensure that there is appropriate climate-related expertise within the business and in 2024 will continue to build on this level of knowledge and understanding.

The Board and the ESG Committee understands that it is best practice to establish carbon-related incentivisation schemes within the Group to ensure that the climate commitments made are appropriately embedded within the culture of the organisation. This will be implemented for the Executive Directors in 2024 and the Remuneration Committee will then consider how to cascade an appropriate incentivisation scheme through the organisation.

#### Management

At a management level, the CEO oversees the operational delivery of the climate-related strategy in alignment with operational priorities. The CEO is supported by:

- › **The Executive Committee** – this represents the Group's most senior leaders and is responsible for the operational delivery of the strategy and cascading the appropriate risks and opportunities into the businesses.
- › **The MD's of each of the businesses** – each MD has the responsibility to deliver the strategy on a day-to-day basis; understanding the climate-related risks that impact their business whilst also harnessing the opportunities that climate-related matters can bring. They are supported by sustainability experts embedded into the businesses' leadership team.
- › **ESG Operational committee** – The ESG Operational committee has not yet been formally established but will be a management-led committee responsible for tracking sustainability programmes and projects across the businesses and reporting the progress of and management of operational ESG initiatives. In particular, the ESG Operational committee will identify and monitor climate-related risks and identify barriers or opportunities that may necessitate the adjustment of approach or securing of additional resource. This committee will come into full force in 2024.

#### Colleagues

At an employee level, sustainability champions work on the achievement of our sustainability goals whilst all colleagues are responsible for adhering to the Group's strategy on a day-to-day basis.



## Risk Management

With the help of external sustainability consultants, the Group has considered all risk and opportunity categories outlined in the TCFD guidance, across all our operations and supply chains, to ensure that appropriate climate-related risks have been identified and analysed. These were identified and assessed over three time-horizons:

› **Short-term: Now to 2025**

In line with current strategic planning and considers expected capital expenditures.

› **Medium-term: 2026 to 2031**

Aligns to where we will most likely see changes to regulatory frameworks (e.g. carbon pricing), and with aspects of our "Restoring our World" ESG strategy.

› **Long-term: 2032 to 2050**

Aligned to the UK Governments Net Zero pledge and the incorporation of useful life of our property assets over the transition risk time horizons. Informs the longer-term aspects of our "Restoring our World" ESG strategy.

Climate-related risks and opportunities are identified, assessed, and managed as part of the existing Group enterprise-wide risk framework to determine their relative significance in relation to other Group risks. Risk assessment, based on agreed likelihood and impact criteria, drives the prioritisation of risks and mitigating actions.

After the risk has been identified and assessed a decision is made about how to respond to it. There are five options which allow mitigation of the risk: treat, tolerate, transfer, terminate, take the risk. These options ultimately ensure appropriate resources are allocated to mitigate risks.

The enterprise-wide risk framework is subsequently reviewed by the Risk Committee and signed off by the Board at least annually, with climate-related risks aggregated into a single environmental principal risk. This allows a Group-level view of climate risk but also helps to understand the specific threats and opportunities that the individual businesses face. Refer to page 44 to 47 for more details on our risk management processes.

Whilst the Board recognises that to achieve its strategic objectives, it must accept and manage a certain degree of risk, it has a low appetite for risks that have significant negative consequences such as climate-related risks. It aims to ensure that the Group either avoids those activities that may result in climate-related risks accelerating or eliminate the risks through applied and focused mitigation efforts.

## Strategy

Our sustainability strategy, "Restoring our World", was published in November 2021 and identifies clearly defined targets which mitigate against climate-related risks and capitalise on climate-related opportunities. The strategy, including climate-related risks and opportunities, is reviewed annually and will include any

changes in regulations, social context, technology availability and the development of climate science. Where required, the strategy will be adapted to reflect these changes.

The strategy was derived in the prior year through climate-related workshops undertaken across the business, supported by external consultants. We have however reviewed the strategy in 2023 to ensure it remains pertinent and appropriate for the business. We utilised our materiality assessment and risk framework to ensure that no material climate-related risks or opportunities were overlooked.

We have further analysed our climate-related risks and opportunities using three scenarios:

1. **Net Zero 2050 (NZE)** – where actions limit the global temperatures rise to 1.5 °C by 2100, with 50% probability, included as it informs decarbonisation pathways used by the SBTi.
2. **Stated Policies (STEPS)** – Outlines a combination of physical / transitions impacts as temperatures rise by 2.6°C by 2100 from pre-industrial levels, with a 50% probability.
3. **RCP 8.5** – an extreme physical risk scenario, where mean global surface temperatures rise by c4.3°C by 2100 from pre-industrial levels as the global response to mitigating climate change is limited.

Although a comprehensive resilience assessment has not been performed to fully quantify the impact of these scenarios on the Group's strategy, we have assessed the directional impact of the likelihood and impact of these scenarios on the identified risks and opportunities to ensure we understand how climate change may affect our business.

Based on the assessment above and the overall enterprise-wide risk framework, our overall climate risk exposure continues to be assessed as moderate. The potential impact of the identified climate-related risks and opportunities is set out on pages 38 to 40 but we do not expect them to drive a fundamental change to current business strategy (with regularly horizon scanning to ensure we are aware of any macro environmental changes) although our risk appetite in this area will push us to continue to reduce our risk exposure. We will also continue to evolve our TCFD reporting throughout 2024 in line with our overall net zero journey set out on pages 32 to 34.

In addition, within our annual budget cycle and capex proposals, the Group's net zero commitments are considered during business case assessment. Our broader strategy of fleet electrification, efficient use of energy, and property consolidation align with our net zero trajectory. This evolving approach provides future climate risk mitigation and carbon benefits (e.g., rotating out of smaller, older facilities into more efficient premises). As a result, there are no material effects of climate-related matters reflected in judgements and estimates applied in the financial statements. We will, however, continue to monitor our climate-related risks and opportunities through our internal risk management framework and apply financial consideration as our business evolves.

## ESG Committee Report continued

### Risks

We have identified five key climate-related risks and five climate-related opportunities that could have a financial impact on the organisation. We have highlighted the impacts most relevant to our sustainability strategy using the key below.

Time-period (Term)	Financial impact	Measurement used to track risk/opportunity	Business area (most impacted)	Risk / opportunity rating				Directional impact of the scenarios identified on the risks/opportunities		
				Negligible	Low	Moderate	High			

#### TCFD category: Transition (Emerging regulation)

##### Carbon pricing shocks

Medium-term	<p>The Group currently does not use carbon pricing but views the implementation of operational carbon pricing as a strong likelihood. However through our annual emissions reduction targets and low-carbon strategy we feel we have mitigating activities in place to deal with the forecasted increase in carbon taxation. Our modelling does however assume that carbon prices rise gradually; the risk to the Group would come from the dislocation caused by sudden short-term carbon price shocks, potentially resulting from regulation or market dynamics.</p> <p>Carbon price swings would be expected to be more of a risk under the NZE scenario, where decarbonisation is driven faster, and the forecasted carbon price is already high.</p> <p>We believe, overall, the impact of this risk is moderate given our net zero commitments and our aims for fleet electrification and move to sustainable power with a target of 100% renewable energy. The successful achievement of our net zero commitment largely offsets material risks associated with carbon pricing shocks on operations under NZE and STEPS.</p>
Higher costs associated with energy price increases	
Scope 1 and 2 emissions	
All business units	
Moderate	
Increased likelihood of risk occurring/ increased impact on risk in scenarios	

##### Carbon pricing in the value chain

Medium-term	<p>The scope of carbon pricing (applied directly or indirectly) is expected to expand over the medium term, and the price of carbon is expected to rise. The International Energy Agency forecasts that carbon prices (US\$/tCO<sub>2</sub>e) relevant to the Group under NZE and STEPS scenarios are projected to increase significantly.</p> <p>Our principal value chain emissions originate from our suppliers (cardboard boxes and packaging for storage). As the Group's suppliers come under carbon pricing mechanisms, or carbon border adjustments, this could result in the supplier passing on the added cost from the carbon tax. Despite the Group looking to reduce scope 3 emissions in line with our net zero commitments, the risk of carbon pricing in the value chain is moderate in line with the overall risk to the Group from carbon price shocks.</p>
Increased cost of purchased goods and services and inbound transportation	
Scope 3 emissions	
All business units	
Moderate	
Increased likelihood of risk occurring/ increased impact on risk in scenarios	

#### TCFD category: Transition (Technology)

##### Reliance on technological advances

Medium-term	<p>The Group's net zero pledge depends on the decarbonising of our vehicle fleet. The current state of EV technology is not sufficient for the Group to transfer to an all-electric fleet due to issues such as availability, battery range, charging infrastructure and cost. There is also an outside risk that the capital expenditure incurred could be written off in coming years if competing technology is developed, making EVs obsolete.</p> <p>To reduce the impact of this risk, the Group has already moved its company car policy to one of 'hybrid or electric only'. By the end of 2023, 17% of our fleet are EV/hybrid vehicles with 91% of our company cars being EV or hybrid. EV chargers have been installed at 14% of our sites and a further network of charging infrastructure is being assessed for deployment over the coming years. Whilst the most cost-effective route for decarbonising heavy-duty vehicles remains the biggest uncertainty, we will continue to work with our fleet partners and manufacturers to assess the most viable long-term alternatives.</p>
Higher costs associated with finding alternative solutions	
Monitor industry developments	
All business units	
High	
Increased likelihood of risk occurring/ increased impact on risk in scenarios	

#### TCFD category: Physical (acute and chronic)

##### Rising mean temperatures (heat stress and external fire disruption)

Long-term	<p>The mean global temperature is expected to rise in all three climate scenarios used. This may cause issues at some of our sites as many of our storage sites at Records Management are tall to provide optimal storage utilisation of customers documents. During periods of high temperatures working conditions can become uncomfortable at the higher levels of the buildings and there are currently no temperature regulating systems at these sites. Excessively high working temperatures would require more breaks for employees, reducing efficiency or, in the extreme, expose employees to heat stress. In addition, periods of hot dry weather raise external fire risks. From the Group's perspective, the risk of fire itself is not significant however nearby fires can disrupt services and potentially impact revenue (e.g. smoke blowing into buildings or site accessibility due to road blockages from fire support services).</p> <p>As part of our mitigation each Business Unit contains a business continuity management team which assess the protection and support of the Group colleagues, critical operations, and infrastructure during emergencies and disasters, including man-made and weather-driven natural disasters. Our business continuity and disaster recovery plans are regularly tested and continually updated. Appropriate insurance policies are also in place, and we monitor our risk of wildfires amongst other acute physical events.</p>
Lost/disrupted revenue and shorter asset life	
% of sites in risk area	
Records Management	
Low	
Neutral likelihood of risk occurring/neutral impact on risk in scenarios	



## Flood disruption

- Long-term
- Lost/disrupted revenue and shorter asset life
- % of sites in risk area
- Records Management
- Low
- Neutral likelihood of risk occurring/neutral impact on risk in scenarios

Record Management's storage units would be most at risk of the increasing flooding probabilities, due to increased rainfall, especially under RCP 8.5. Certain operations may be at higher risk than others but through the WRI's Aqueduct Water Risk Atlas analysis none of the sites assessed are currently considered above a low-medium risk of flooding. However, flooding at our sites could disrupt the services we provide due to the sites having to be evacuated for safety concerns or damage to records or equipment from water ingress.

To mitigate this risk, we will continue to assess the suitability of current key sites and if there are any medium to long term flooding risks posed at these locations. Our property acquisition strategy will also look to avoid areas that could be susceptible to an increased risk of flooding. To date, there have been no incidents of water ingress or flooding and with our business continuity plans we believe we are well placed to deal with any increase in probability of flooding.

## Opportunities

Time-period (Term)	Financial impact	Measurement used to track risk/opportunity	Business area (most impacted)	Risk / opportunity rating				Directional impact of the scenarios identified on the risks/opportunities		
				Negligible	Low	Moderate	High			

### TCFD category: Product and services

#### Expansion of circular economy and low carbon services e.g. IT/office recycling

- Medium-term
- Increased sales
- Revenue from circular economy and low carbon services.
- Technology, Harrow Green and Records Management
- High
- Increased likelihood of opportunity occurring/increased impact on opportunity in scenarios

With the focus on a sustainable development and mitigating climate change, the circular economy is expected to expand. We see specific opportunities in two businesses that can be pursued further to expand our revenue: Technology and Harrow Green, which both already offer circular economy services relating to the recycling of IT or office furniture.

Additionally, Records Management already offers customers a low-carbon storage solution, which enables customers to reduce their emissions through a reduction in space. We are looking to capitalise on the expansion of these services.

### TCFD Category: Energy sources

#### Zero emission energy (self-generation and Power Purchasing Agreements)

- Medium-term
- Decreased costs
- Renewable energy usage
- All business units
- High
- Neutral likelihood of opportunity occurring/neutral impact on opportunity in scenarios

The Group sees renewable energy contracts as a strong opportunity to reduce our emissions intensity with 86% of our sites having directly procured electricity already being supplied through Renewable Energy Guarantees of Origin ("REGO") backed suppliers and the remainder of our directly procured contracts looking to transfer in 2024.

The Group also has the potential to generate its own renewable energy. With the significant roof space there is an opportunity to develop solar panels on the roofs across our property estate, subject to landlord consent. This offers an opportunity to become less dependent on the national grid which has a low proportion of renewable energy and means the Group can reduce its dependence on fossil fuels and in the medium-term lower its cost base.

### TCFD category: Resource efficiency

#### Water, energy, waste savings

- Medium-term
- Decreased costs
- Water, energy and waste consumption
- All business units
- Moderate
- Neutral likelihood of opportunity occurring/neutral impact on opportunity in scenarios

There are incremental opportunities to improve our resource efficiency, reducing energy and waste across the Group. Our sites are continuously looking at ways to improve efficiency, both to reduce costs, but also our carbon footprint, e.g. through the reduction in water and waste, which we monitor, as well as in the use of fuels and electricity in process.

The ESOS Phase 3 assessments performed in 2023 have further identified opportunities to generate a long-term return on sustainability initiatives and we have further assessments planned for 2024.



## ESG Committee Report continued

### Electrification of fleet

- Medium-term
- Decreased costs
- % of fleet that is electrified
- All business units
- High
- Increased likelihood of opportunity occurring/  
increased impact on opportunity in scenarios

The Group sees the chance to make its vehicle fleet more sustainable thorough electrification or other sustainable technologies as a significant opportunity. The Group has already established a programme to rotate fleet towards new technology and is committed to The Climate Group EV-100. Transferring the fleet to low-carbon technology will provide the opportunity for the Group to reduce our emissions footprint, especially Scope 1 emissions from company owned vehicles and to ultimately reduce the cost of running the fleet.

EV chargers are currently installed at 14% of our sites, with plans to install a further network of electric charging points across the Group's property estate so journeys between sites will be made fossil fuel free.

Whilst this opportunity is significant, the pace at which it can be realised is interlinked with the technological advancement risk noted above.

TCFD category: Transition (market)

### The Group's sustainability positioning

- Medium-term
- Faster revenue
- The Group's external sustainability ratings  
(e.g., MSCI)
- All business units
- Moderate
- Increased likelihood of opportunity occurring/  
increased impact on opportunity in scenarios

Under the STEPS and NZE scenarios, stakeholders will increasingly incorporate climate change into all business decisions as the world transforms into a low carbon economy. Customers are increasingly incorporating sustainability into their tenders (e.g. UK government) and adding supplier carbon assessment (Scope 3) as part of their everyday business. Certain customers will have specific demands and criteria that are sustainability-linked which the Group can adhere to. Relative to our peers we also believe we are very well placed in terms of sustainability governance, reporting and strategy. Our ESG strategy "Restoring our World" emphasises how even with more stringent sustainability regulation and standards we are well placed to capitalise on sustainability initiatives.

## Metrics and targets

The metrics and targets that the Group monitors are closely linked to our climate-related risks and opportunities. Our reporting includes Scopes 1, 2 and some scope 3 greenhouse gas (GHG) emissions as well as energy consumption. The calculation of our carbon footprint is in line with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard and is externally certified to a limited level of assurance. Reducing our own carbon emissions and developing our ability to offer low carbon services to our customers is a core part of our sustainability proposition and minimum emissions reduction target is built into our annual external certification.

Other metrics that we track include (refer to page 29):

- › Emissions intensity
- › % of hybrid/EV company cars and in the total fleet
- › % of directly procured energy which is REGO backed

We believe that by monitoring these metrics, it will allow the Group to drive emissions reductions in line with our net zero target.

We will continue to develop our metrics throughout 2024 and will look to capture a number of the measurement metrics set out on pages 38 to 40.

Our overall target is to be a net zero organisation by 2050, in line with the UK Government's commitment to be net zero by 2050. To meet this climate commitment, the Group has established interim targets around renewable energy consumption and fleet electrification along with carbon emissions reductions targets for the near and medium-term – these are outlined in more detail on pages 32 to 34. By monitoring these metrics and targets, we can ensure that we are mitigating risk exposure as outlined above.

Our climate related priorities for 2024 also include objectives to enhance our metrics and targets in the near-term, these include:

- › We will look to increase the frequency of our carbon reporting, from annually to quarterly. This will allow us track progress against our interim net zero targets.
- › We will complete an assessment of our Scope 3 baseline, ensuring that the remaining relevant emissions are quantified, and a plan is in place to track reporting of those. The Scope 3 emissions that are stated on page 35 are expected to be a small portion of our overall Scope 3 footprint, once fully quantified we expect our total Scope 3 emissions to be materially higher.
- › We will start to develop a supplier engagement plan for our top suppliers which sets out the likely activities we will look to introduce to start to drive down Scope 3 emissions.
- › We will develop further commitments in relation to Resource Use and Biodiversity to align with the focus of "Our Planet" strategy.

## Climate-related framework compliance

Companies  
Act  
S414CB

Recommendation	Recommended disclosures	Response		
<b>Governance</b> Disclose the organisation's governance around climate-related risks and opportunities	a) Describe the Board's oversight of climate-related risks and opportunities	The Board has overall responsibility for climate-related risks and opportunities with a Board-level ESG Committee also in place to help drive strategic and operational focus.	Page 36	(a)
	b) Describe management's role in assessing and managing climate-related risks and opportunities	The CEO oversees the operational delivery of climate-related activity in alignment within operational priorities. He is supported by the Executive Committee, the business unit MD's and in 2024, a management-led ESG Operating committee.	Page 36	(a)
<b>Strategy</b> Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material	a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term	The Board has identified environmental risk as a principal risk as detailed on page 46, which is underpinned by specific climate-related risks and opportunities outlined within the Group's climate risk assessment.	Pages 37 to 40	(d)
	b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	The Group recognises the impact that climate change may have on its strategy, operations and financial planning and is taking action to address the implications of climate-related risks across our business. The full financial quantification of these risks and opportunities has not yet been completed however we have identified the risk rating and directional impact of how the risks and opportunities respond to various scenarios.	Pages 37 to 40	(e)
	c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	Although a comprehensive resilience assessment has not been performed to fully quantify the impact of these scenarios on the Group's strategy we have assessed the directional impact of the likelihood and impact of these scenarios on the identified risks and opportunities to ensure we understand how climate change may affect our business	Pages 37 to 40	(f)
<b>Risk management</b> Disclose how the organisation identifies, assesses, and manages climate-related risks	a) Describe the organisation's processes for identifying and assessing climate-related risks	The Group's overall risk management approach captures Group-wide risks, including climate change. As risks are captured, an assessment in terms of the impact on the Group's strategy is undertaken, in addition to a likelihood vs impact assessment, which determines the significance of all risks.	Page 37	(b)
	b) Describe the organisation's processes for managing climate-related risks	Risk assessment, based on our agreed likelihood and impact criteria drives the prioritisation of mitigating action.	Page 37	(b)
	c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management	Climate-related risks and opportunities are identified, assessed and managed on the existing Group risk management framework.	Page 37	(c)
<b>Metrics and targets</b> Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material	a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	All metrics used to assess climate-related risks and opportunities are outlined on page 40.	Page 40	(h)
	b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	The Group reports Scope 1, 2 and some Scope 3 greenhouse gas (GHG) emissions set out on page 35. We will continue to quantify our scope 3 emissions throughout 2024.	Page 40	(h)
	c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets	The Group's journey to net zero is set out on pages 32 to 34 and includes near-term, medium-term and longer-term targets.	Page 40	(g)

### ESG principles

Below is a key summary of the policies held by the Group in relation to non-financial matters:

#### Code of conduct

High standards of ethical behaviour and compliance with laws and regulations are essential to protecting the reputation and long-term success of the Group. Our Code sets out the ethical standards that should govern the activities of Restore, its subsidiaries, its employees and any business partners. It gives guidance on recognising when and where ethical problems exist, and how to avoid them or what to do if they cannot be avoided.

Our Code applies to all our employees, contractors and sub-contractors working in all of our businesses. We expect our customers, suppliers, distributors, agents and all other stakeholders we interact with to abide by it or to operate to similar standards. Our Code applies across all our operations, wherever they are based, and it always applies.

We provide a dedicated independent whistleblowing support line, available at all times, through which concerns can be raised, anonymously if required. All concerns raised will be investigated in a timely, fair and transparent manner.

A copy of our Code of Conduct and Speak Up Policy are available to view on our website.

#### Anti-bribery & Collusion Policy

Restore Plc has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings.

No party may:

- › give or promise any financial or other advantage to another party (or use a third party to do the same) on the Group's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will itself constitute improper conduct;
- › request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such advantage; or
- › collude with other parties in order to achieve an improper purpose including influencing improperly the actions of another party specifically in relation to a bid or tendering process.

Parties must:

- › be aware of and alert at all times of all bribery risks;
- › exercise due diligence at all times when dealing with third parties on behalf of the Group; and
- › report any and all concerns to the relevant person in accordance with the Group's Whistleblowing Policy. In the case of non-employees, they should contact their normal point of contact in the Group or if that person may be implicated they should contact a Director or the Company Secretary.

A copy of the Anti-Bribery and Collusion policy is available to view on our website.

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### Case Study

## "This is me" – Diversity data capture campaign

Throughout the second half of 2023, we ran our diversity data capture campaign, "This is me". We felt that it was important to make sure that we knew a little more about our colleagues to help us make decisions and take actions that are right for our people.

We were delighted that so many colleagues took the time to complete the survey with data received for almost 60% of our colleagues.

Now that we have this data we will use it alongside our wider diversity and inclusion activity to continue to improve our practices and ensure we are an inclusive place to work.

Over the course of 2024 our agenda for diversity and inclusion will focus on:

- › Developing the existing colleague networks and launching a further three (Disability, Women's, Mens').
- › Obtaining feedback and thoughts from the diversity data, colleague networks as well as our customers to evolve our practices and policies.
- › Rolling out awareness training on inclusion.





## Equality and diversity policy

The Group wants to ensure that employees have the opportunity to benefit from employment, training and development regardless of sex, colour, race or ethnic or national origin, religion or belief, disability, age, marital status, sexual orientation, gender assignment or having part time or fixed term employment.

The Group are committed to becoming an inclusive place to work, where all employees can reach their true potential in the job that they choose to do. We are committed to eliminating discrimination amongst our workforce and our objective is to create a working environment in which there is no unlawful discrimination and all decisions are based on merit. We value the contribution which all individuals can make to the success of the Group and we will strive, therefore, to ensure equality of opportunity for all to compete fairly. We will employ a workforce which recognises and takes account of the diverse, multi-cultural society in which we live.

## Modern slavery and human trafficking statement

Through our people we deliver vital services to our customers. We therefore condemn slavery in all its forms and will never tolerate it both within our businesses and across our supply chains. We will not engage in any form of human trafficking and nor will we use forced, bonded, compulsory, illegal or child labour – or knowingly work with anyone who does. Working primarily within the UK, we believe our modern slavery risk is low, but we remain vigilant and continuously challenge ourselves to better understand the risk and its associated controls.

The Group has published its Modern Slavery and human trafficking statement in respect of the year ended 31 December 2023 on our website. The 2024 statement will be published on our website in compliance with the required deadline.

## Human rights and ethical policy

This Ethical Policy and the Code of Conduct serve as guidelines for all the Group's business practices. Through its business practices the Group seeks to support the principles of the Universal Declaration of Human Rights ("UDHR"). The Group's position on Human Rights reflects the core requirements of the UDHR, such as freedom from torture, unjustified imprisonment, unfair trial and other oppression. It also includes freedom of expression, religion and political or other representation. Human rights are those rights we all deserve. They include the right to life, respect for privacy and family life, freedom of thought and religion, and the right not to be subjected to modern slavery. We also have the right to be treated with respect and dignity and we want the places where we work to reflect this.

On the basis of this policy the Group will not provide support or work with businesses or organisations which fail to uphold basic human rights within their sphere of influence. The Group recognises that businesses have the opportunity to ensure that human rights are upheld in all those aspects of their operations that they could reasonably expect to control.



## Case Study

# Wellbeing support for our colleagues

The wellbeing of our colleagues and their families is fundamental to the success of Restore. During 2023, in response to colleague feedback and to trends we are seeing externally in society and in the workplace, we developed a new wellbeing strategy, along with a range of wellbeing tools and resources to support everyone in the Group.

Our new wellbeing strategy covers four key areas of wellbeing, which have been benchmarked against other leading employers and based on recommendations from leading experts.

- › **Physical wellbeing** – this includes health and safety and lifestyle choices that link to how we look after our physical self.
- › **Social wellbeing** – this includes feeling a sense of community, belonging, connection, respect, purpose and meaning, training and development if we want it.
- › **Mental wellbeing** – this includes stress and how we keep ourselves in mental health as opposed to ill-health.
- › **Financial wellbeing** – this includes our knowledge and approach to managing our financial situation.

To enact this strategy, we have taken the following actions this year:

1. Produced a new Wellbeing Policy to guide colleagues and people leaders on best practice for managing wellbeing within the workplace.
2. Developed a new digital home for all wellbeing materials called Wellbeing House which is available to all colleagues.
3. Established a governance structure to support the wellbeing agenda and developed KPIs to track our progress in this area.
4. Developed a wellbeing workshop that will be rolled out across the business.
5. Established Mental Health First Aiders across the business who are trained to be able to understand the different types of mental health issues someone might be experiencing, and how to provide help.