

People & Culture

| Sustainability Policy

“Enabling our customers to be better connected through technology, creating opportunities for our people and developing trusted relationships within our communities.”

Purpose of Document

The purpose of this document is to set out the policy for how Focus Group identifies, manages and reports on its material environmental, social and governance (“ESG”) and sustainability risks and responsibilities. It provides a framework for integrating sustainability into our operations, culture and decision-making, and sets out the commitments Focus Group makes to its employees, customers, investors and wider communities.

Applicability and Scope

This policy applies to all Focus Group employees across all functions and locations, including employees who have joined through acquisition and are on Focus Group terms and conditions. It does not apply to contractors, consultants or non-executive directors.

Effective Date

This policy is effective from the date the version is approved.

Responsibility

Directors, Heads of Department, all Managers and Team Leads are responsible for implementing and maintaining this policy across all relevant staff.

All employees are responsible for making themselves familiar with the policy and following the guidance detailed.

Policy Statement

Focus Group believes that material sustainability factors including good governance, positive social impact and responsible environmental stewardship are critical to our business from both an opportunity and a risk-mitigation perspective. We seek to properly assess, address and monitor our impact on the environment; our relationships with employees, customers and the communities where we operate; and our governance of sustainability issues.

This Sustainability Policy provides a broad framework for our approach to integrating sustainability considerations into our operations. By maintaining this Policy, we further support our duty as a responsible business and our mission of:

“Enabling our customers to be better connected through technology, creating opportunities for our people and developing trusted relationships within our communities.”

Focus Group is committed to fostering structures and a culture that supports:

- The ten Principles of the UN Global Compact, which reflect a business’ fundamental responsibilities to operate in ways that, at a minimum, address key areas: Human Rights, Labour, Environment and Anti-Corruption.
- The OECD Guidelines for Multinational Enterprises, which reflect the expectation from governments to businesses on how to act responsibly across human rights, labour rights,

environment, bribery, consumer interests, information disclosure, science and technology, competition and taxation.

- The UN Guiding Principles on Business and Human Rights (“UNGP”) to identify, prevent and mitigate adverse human rights impacts across our operations, and engage in remediation where required.

Good Governance

Good corporate governance helps to build an environment of trust, transparency and accountability necessary for fostering long-term investment, financial stability and business integrity. Focus Group seeks to promote strong oversight, transparency and risk management at all levels of the organisation and is committed to good governance through relevant metrics and procedures, including management structures, decision-making processes, audit and risk controls, values and code of ethics, and compliance with applicable laws and regulations.

Risk management and business continuity

Focus Group maintains active risk management processes to identify, assess and mitigate sustainability-related risks across the business. Key sustainability risks, assessed as high likelihood and/or high impact are escalated to the Board. Focus Group also maintains business continuity plans to ensure resilience against material disruptions, including those arising from climate change, cybersecurity incidents and other operational risks. These plans are reviewed on a regular basis.

Ethics and responsibility

The successful business operation and reputation of Focus Group is built upon the principles of fair dealing and ethical conduct of its employees. In connection with this commitment, Focus Group maintains anti-corruption and anti-bribery policies and procedures, and publishes an annual Modern Slavery Statement.

Privacy, cybersecurity and responsible AI

Focus Group seeks to create a secure environment that protects its employees’ and customers’ privacy and complies with applicable laws and regulations. Focus Group takes the confidentiality, data integrity and information security of its own data and systems, as well as that of its customers, seriously, and aims to embed security and privacy at all stages of the technology lifecycle.

Focus Group maintains the following policies in connection with this commitment: an Information Security Policy, IT Acceptable Use Policy, GDPR and Data Protection Policy, Phishing Policy and Website Privacy Policy (UK), as well as relevant certifications including ISO 27001.

Focus Group is committed to the responsible and secure use of artificial intelligence (“AI”). Our Artificial Intelligence Usage Policy governs the use of AI tools across the business, including approved tools, data protection requirements and employee responsibilities. We are committed to the following principles for responsible AI:

- Fairness: AI systems will be designed and monitored to avoid bias and discriminatory outcomes.
- Transparency: we will be clear with employees and customers about where and how AI is being used.
- Privacy: AI use will comply with our data protection obligations and will not compromise personal data.
- Accountability: clear ownership is assigned for AI systems and outcomes, with escalation routes for concerns.

- Environmental consideration: we will seek to understand and minimise the energy consumption associated with AI use.

Environment and Climate Change

Focus Group is committed to managing environmental risks that are material to its business and key stakeholders. We seek to ensure that our commitment to minimising our environmental impact is implemented throughout our practices.

Carbon emissions

- Focus Group is committed to measuring and reporting on its carbon footprint at least annually. We are currently reviewing the suitability of Science Based Targets (SBTi) for our business as part of our commitment to setting robust and credible carbon reduction goals.
- Focus Group is committed to purchasing, or where applicable generating, renewable energy for its main offices where this is feasible and where it has the influence or control in respect of energy procurement.
- Focus Group will seek to conduct regular energy audits across its offices. Focus Group is in scope of the UK Energy Savings Opportunity Scheme (ESOS) and conducts energy saving audits of its UK offices, seeking to implement recommendations to reduce energy consumption.
- Focus Group is in scope of the UK Taskforce for Climate-Related Financial Disclosures (TCFD) and reports in line with TCFD requirements. We are monitoring the transition to ISSB Standards (IFRS S1 and S2), which fully incorporate the TCFD recommendations. We strive to identify, assess and mitigate potential risks and impacts of climate change during our regular risk reviews
- Focus Group is committed to engaging with its key suppliers on climate change as part of its commitment to reduce Scope 3 carbon emissions.

Waste

- Focus Group strives to act in line with the waste hierarchy of reducing, reusing and recycling whenever possible. The business provides appropriate facilities and encourages recycling across its offices.
- Focus Group seeks to minimise consumption of all resources and, in particular, consumption of non-recyclable and heavily packaged goods. We strive to purchase environmentally responsible products and services as a first option, including using washable equipment and crockery and providing reusable cups and water bottles for staff.
- Focus Group adheres to the EU Directive on the recycling of Waste Electrical and Electronic Equipment (WEEE), ensuring e-waste does not go to landfill but is disposed of in a way that does not harm the environment.

Business travel

- Focus Group is committed to measuring and reporting on its carbon footprint from business travel at least annually, and to engaging internally with teams to reduce it.
- Staff are encouraged to 'think twice' before travelling by air: will a face-to-face meeting move the relationship or project forward at a key point, or would virtual meetings achieve the same end?

- Focus Group advocates for the use of virtual meeting platforms and online collaboration tools, and aims to hold all internal meetings across geographies virtually rather than in person.
- Where travel is required, Focus Group encourages the use of transport modes with less environmental impact, such as rail and low-emission vehicles.
- Staff are encouraged to be mindful about class of travel. Travelling in business class on a long-haul flight has a carbon footprint approximately four times larger than travelling in economy class.
- Meetings requiring travel to the same geography should, to the greatest extent possible, be grouped together. It is only under exceptional or business-critical circumstances that Focus Group allows long-haul travel for a single meeting.
- Staff should carefully consider the number of attendees required for any given meeting, using hybrid or virtual formats to enable wider participation without unnecessary travel.

People

Culture, values and talent

Focus Group's people are at the heart of everything we do. We are committed to building a workplace culture where every individual feels welcomed, valued and inspired to perform at their best. Our culture is underpinned by our values, which guide how we behave with each other, our customers and our communities.

Focus Group is committed to investing in the attraction, development and retention of talented people. We provide development opportunities, regular feedback, recognition programmes and a range of benefits designed to support employee wellbeing and career growth. We monitor employee engagement and staff turnover on a regular basis, using these insights to continuously improve as an employer.

Health, safety and wellbeing

Focus Group recognises its responsibility to promote the health, welfare and safety of its employees. Focus Group maintains a Health and Safety Policy and provides a wide range of benefits covering employee time off, healthcare, financial security and other wellbeing needs. At a minimum, Focus Group's safety policy complies with the Health and Safety at Work etc. Act 1974.

Focus Group is committed to supporting the mental health and wellbeing of its workforce, including through access to relevant resources, open communication and a culture that reduces stigma around mental health.

Diversity, equity and inclusion

The diversity of Focus Group's employees is a tremendous asset. Focus Group is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. We are committed to building a team that reflects the diversity of people and perspectives in the communities in which we live and work, and to taking active steps to make our industry more diverse, inclusive and equitable.

Focus Group is an Equal Opportunity Employer and maintains relevant policies covering anti-harassment, anti-bullying and other employment matters. Focus Group also has Employee Resource Groups which connect employees who share similar interests or backgrounds, focusing on diversity, equity, inclusion and belonging.

To the extent permissible under applicable laws, Focus Group will seek to ensure that its commitment to diversity, equity and inclusion is implemented throughout its practices, including:

- Recruiting, developing and retaining a diverse team from varying backgrounds and life experiences.
- Fostering respect and a culture of inclusion and belonging among all at Focus Group.
- Fostering relationships with third-party organisations that promote diversity, equity and inclusion in our industry.

Focus Group will comply with all applicable laws, including the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

Labour relations

Focus Group is committed to promoting internationally recognised core labour standards, including freedom of association, the right to collective bargaining, the elimination of forced labour and child labour, and the elimination of discrimination in employment, as expressed in the ILO Declaration on Fundamental Principles and Rights at Work, the four labour principles of the UN Global Compact, and the OECD Guidelines for Multinational Enterprises. Focus Group complies with all applicable laws

Human Rights and Modern Slavery

Focus Group has a role to play in respecting human rights across its business and supply chain, as defined by the International Bill of Human Rights and the principles set out in the ILO's Declaration on Fundamental Principles and Rights at Work. Focus Group supports the principles outlined in the UN Guiding Principles on Business and Human Rights.

Focus Group complies with the requirements of the UK's Modern Slavery Act 2015. Modern slavery is a crime and a violation of fundamental human rights. Focus Group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships. Our Modern Slavery Statement is published annually and sets out the steps we take to ensure modern slavery is not present in our operations or supply chain.

Supply Chain

Focus Group relies on a broad range of supplier relationships and partnerships. It is vital that our suppliers share our commitment to responsible business conduct, from how they source materials to how they treat workers and manage their environmental impact.

Focus Group's approach to supply chain sustainability includes:

- Assessing key suppliers against our sustainability expectations as part of procurement and onboarding.
- Engaging key suppliers on climate change, labour standards and ethical business conduct, and requesting relevant sustainability data on a regular basis.
- Working collaboratively with suppliers to support improvement where gaps are identified, while taking further action where material non-compliance persists.
- Referencing our Modern Slavery Statement as the basis for our supply chain expectations on human rights and labour standards.

- Engaging material suppliers on their own carbon footprints and reduction plans as part of our commitment to reduce Scope 3 carbon emissions.

Social and Community Engagement

Focus Group aims to use its position as a business to support the development of its communities. This includes through its philanthropic arm, the Focus Foundation, as well as through employee volunteering, charitable giving and engagement with community and industry partners.

We are committed to being transparent about our social impact and will report on our community activities as part of our annual sustainability communications.

Reporting and Transparency

Focus Group is committed to being transparent about its sustainability performance. We will publish an annual sustainability report covering our progress against the commitments set out in this Policy, made publicly available and communicated to employees, investors and other key stakeholders.

Our sustainability reporting is informed by established frameworks including TCFD. We are monitoring the requirements of the EU Corporate Sustainability Reporting Directive (CSRD) and will ensure we are prepared to meet any applicable obligations as they come into force.

Focus Group welcomes feedback from stakeholders on its sustainability performance and approach. Feedback can be directed to the People team at people@focusgroup.co.uk.

Grievance and Incident Reporting

Focus Group is committed to maintaining clear, accessible and safe pathways for raising sustainability-related concerns, for both employees and external stakeholders.

Employee reporting

All employees are encouraged to raise any concern relating to this Policy or sustainability matters more broadly. Concerns may be raised with a line manager, the Head of People or through the company's whistleblowing mechanism. Focus Group will not tolerate any retaliation against individuals who raise concerns in good faith.

Whistleblowing

Focus Group maintains a formal whistleblowing policy providing confidential reporting channels for employees to raise concerns about potential breaches of law, ethical standards or company policy, including ESG matters. Employees who report in good faith are protected from any form of retaliation or detriment.

External stakeholders

External stakeholders who wish to raise a concern about Focus Group's conduct in relation to sustainability matters may do so by contacting the Head of People directly. Focus Group will acknowledge and investigate all material concerns raised.

Incident escalation

Any material sustainability incidents, including those relating to the environment, human rights, data privacy or business conduct must be reported to the Head of People as soon as practicable. Material incidents will be escalated to senior leadership as appropriate.

Oversight and Governance

Focus Group is in the process of establishing a sustainability committee to provide oversight of this policy and its implementation. This will include a nominated sustainability lead and regular reporting to senior leadership on key sustainability risks and progress against the commitments set out in this policy.

To implement this policy, Focus Group is committed to:

- Investing time and resources to ensure it can fulfil its sustainability commitments consistently.
- Providing employees with the training and tools necessary to understand and apply this policy in their roles.
- Reporting on progress against the commitments in this policy to key stakeholders, including employees, investors and the public at least annually.
- Reporting any material breaches or concerns to senior leadership in a timely manner.

This policy has been approved by the Head of People. All employees must notify the Head of People as soon as possible if they believe or suspect that a conflict with this Policy has occurred or may occur in the future.

Document Revisions Log

Date	Ver	Revised By	Approved By	Description of change
06/05/2026	1.0	S. Scott	T. Logan	FINAL