



WHISTLEBROOK
INSIGHT FOR FINANCIAL SERVICES

Environmental, Social and Governance (ESG) Policy

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Table of Contents

1 Introduction4

2 Environmental Responsibility4

3 Social Responsibility.....4

4 Governance and Ethics5

5 Implementation and Review6

Whistlebrook Limited Environmental, Social and Governance (ESG) Policy

1 Introduction

At Whistlebrook, we are committed to conducting our business in a responsible, ethical and sustainable manner. As a provider of software and related services, we recognise the importance of integrating Environmental, Social and Governance (ESG) considerations into our business strategy, operations and decision-making processes.

This ESG Policy outlines our commitment to promoting sustainable business practices, supporting our employees and communities, maintaining high standards of governance, and creating long-term value for our customers, employees, suppliers and other stakeholders.

The Board of Directors has overall responsibility for the oversight of ESG matters and for ensuring ESG considerations are incorporated into our strategic planning and risk management processes.

2 Environmental Responsibility

2.1 Environmental Compliance

We will comply with all applicable environmental laws, regulations and standards, and seek to minimise the environmental impact of our business activities.

2.2 Resource Efficiency

As a software and services business, we recognise that our environmental impact arises primarily from office operations, technology infrastructure and business travel. We will seek to minimise our consumption of resources by:

- Promoting energy-efficient working practices.
- Reducing unnecessary waste.
- Encouraging recycling and responsible disposal of equipment.
- Supporting digital processes that reduce paper consumption.
- Considering environmental impacts when procuring goods and services.

2.3 Carbon Footprint

We are committed to reducing our carbon footprint through continual improvement initiatives, efficient use of resources, and responsible business practices. Where appropriate, we may support recognised carbon reduction or offset programmes as part of our wider environmental objectives.

2.4 Environmental Awareness

We will encourage employees to adopt environmentally responsible behaviours and support initiatives that contribute to sustainable working practices.

3 Social Responsibility

3.1 Employee Well-being

We value our employees and are committed to providing a safe, healthy, inclusive and supportive working environment that promotes employee wellbeing, personal development and work-life balance.

3.2 Diversity and Inclusion

We believe that diversity strengthens our organisation. We are committed to treating all employees, customers and stakeholders with fairness, dignity and respect, irrespective of race, colour, nationality, ethnic origin, religion or belief, gender, gender reassignment, sexual orientation, age, disability or any other characteristic protected by law.

3.3 Human Rights and Modern Slavery

We respect and support internationally recognised human rights and oppose all forms of discrimination, forced labour, child labour, human trafficking and modern slavery.

We expect our employees, suppliers and business partners to uphold these same principles. We publish a separate Modern Slavery Statement which outlines the steps we take to identify and mitigate the risk of modern slavery within our business and supply chains.

3.4 Learning and Development

We are committed to supporting the professional development of our employees through training, knowledge sharing and opportunities for career progression.

3.5 Community Engagement

We aim to contribute positively to the communities in which we operate through charitable support, volunteering, local initiatives and other activities that deliver social value.

4 Governance and Ethics

4.1 Business Ethics

We are committed to conducting our business with honesty, integrity, transparency and professionalism. We will comply with all applicable laws, regulations and industry standards and maintain ethical business practices throughout our operations.

4.2 Information Security and Data Protection

As a software provider, we recognise that information security is fundamental to responsible governance.

Whistlebrook maintains certification to the ISO27001 Information Security Management System (ISMS) standard, demonstrating our commitment to managing information security risks and continually improving our security controls and processes.

We are committed to protecting company, customer and employee information through appropriate technical and organisational controls and by complying with applicable data protection and privacy legislation. We will continually review and improve our information security practices and standards.

4.3 Responsible Procurement and Supply Chain Management

We seek to work with suppliers and business partners who share our commitment to ethical conduct, environmental responsibility, human rights and good governance.

Where appropriate, we will consider ESG-related factors when selecting and reviewing suppliers and will encourage responsible business practices throughout our supply chain.

4.4 Stakeholder Engagement

We will maintain open and constructive communication with employees, customers, suppliers, shareholders, regulatory bodies and other stakeholders, ensuring that feedback and concerns are considered in our decision-making processes.

4.5 Compliance and Accountability

We will establish processes to monitor and assess adherence to this policy and will periodically review our ESG performance.

To support continual improvement, we will establish and review appropriate ESG objectives, which may include measures relating to:

- Employee wellbeing and engagement.
- Diversity and inclusion.
- Environmental initiatives.
- Information security awareness and training.
- Supplier governance and compliance.
- Community engagement activities.

We will seek to report progress in a transparent and accountable manner where appropriate.

5 Implementation and Review

This policy applies to all employees, contractors and temporary workers acting on behalf of Whistlebrook. We will communicate this policy throughout the organisation and integrate ESG considerations into our strategic planning, operational activities and risk management processes.

The Board of Directors will review this policy annually to ensure it remains relevant, effective and aligned with business objectives, stakeholder expectations and evolving ESG best practice.

By adopting this policy, Whistlebrook reaffirms its commitment to sustainable business practices, social responsibility, effective governance and ethical conduct.