

## Environmental, Social, and Governance (ESG) Strategy

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### Introduction

While OHG is not currently within scope of SECR or mandatory climate-related disclosures, the Group recognises the direction of travel for public companies and NHS partners. OHG is therefore committed to proportionate alignment with NHS Net Zero policy and UK best-practice ESG frameworks to future-proof the business as it scales operations and infrastructure.

As an AIM-listed company, we are committed to sustainable growth, responsible corporate behaviour, and creating value for all stakeholders. Our ESG strategy therefore aligns with AIM Rule 26, UK regulatory requirements and global best practices.

### Environmental Responsibility

As a healthcare provider, OHG will seek to balance environmental sustainability with the highest clinical safety standards. As a Group, we aim to minimise our existing environmental impact where practicable and promote sustainability through:

- **Carbon Footprint Reduction:** Implementing energy-efficient technologies, reducing emissions, and transitioning to renewable energy sources where feasible.
- **Resource Efficiency:** Enhancing waste management, increasing recycling rates, and optimising resource use to lower environmental impact.
- **Sustainable Supply Chain:** Engaging suppliers where possible who adhere to ESG best practices and assessing the environmental impact of our procurement decisions.
- **Regulatory Compliance:** Ensuring full adherence to UK environmental laws

With the planned introduction of our first surgical hub on the horizon, OHG will seek to incorporate sustainable design principles, including energy-efficient building systems, low-carbon heating solutions, and responsible construction practices, subject to clinical and financial viability. We will therefore extend the scope of our environmental strategy in future to include:

- Clinical waste reduction and segregation
- Anaesthetic gas management
- Water efficiency
- Infection control vs sustainability balance

### Social Responsibility

We foster a positive impact on our stakeholders with a key focus on:

- **Employee Well-being and Inclusion:** Maintaining a diverse, equitable and inclusive workplace, providing market competitive remuneration and supporting mental and physical health initiatives.

- **Workforce Sustainability:** Supporting recruitment, training and retention of skilled clinical and non-clinical staff, recognising workforce resilience as critical to patient safety and long-term service delivery.
- **Community Engagement:** Partnering with local organisations, investing in social initiatives, and encouraging employee volunteering.
- **Supplier and Provider Responsibility:** Ensuring product/service safety, ethical marketing, and strong customer relationships.
- **Patient Care, Safety and Experience:** delivering high-quality, safe elective care in line with NHS clinical governance standards, with a commitment to continuously improving patient outcomes, patient experience and transparency.
- **Human Rights & Ethical Labour Practices:** Upholding fair labour practices across our operations and supply chain, in line with the UK Modern Slavery Act.

### Governance Excellence

We uphold high governance standards through:

- **Board Oversight of ESG Leadership:** Day-to-day responsibility for ESG oversight is delegated to senior management, with formal review by the Board at least annually and integration of ESG criteria into decision-making, where appropriate.
- **Transparency & Reporting:** Providing regular, accurate ESG disclosures in annual reports and adhering to AIM Rule 26.
- **Risk Management & Compliance:** Establishing strong risk management frameworks to address ESG risks and regulatory requirements.
- **Ethical Business Conduct:** Enforcing anti-corruption policies, whistleblowing mechanisms, and data protection measures.
- **Clinical Governance & Patient Safety:** Maintaining robust clinical governance frameworks, ensuring regulatory compliance, clinical risk management, and continuous quality improvement.

### ESG Targets & Performance Monitoring

To ensure accountability, transparency and continuous improvement, OHG has established clear ESG priorities supported by measurable targets and ongoing performance monitoring. Our approach is designed to be proportionate to the size of the Group while aligning with NHS expectations and evolving investor standards:

#### Environmental Targets

- **Carbon Reduction:** Following the establishment of a baseline for Scope 1 and Scope 2 greenhouse gas emissions, OHG plan to achieve a minimum 25% reduction in Scope 1 and Scope 2 emissions by 2030, relative to the baseline year.
- **Net Zero Commitment:** Achieve net-zero Scope 1 and Scope 2 emissions by 2050, aligned with NHS Net Zero ambitions, subject to clinical and operational requirements.

- **Sustainable Infrastructure:** For the planned surgical hub, incorporate energy-efficient design principles and low-carbon technologies where feasible, and monitor energy and water consumption once operational.

### Social Targets

- **Workforce Diversity and Inclusion:** Increase representation of under-represented groups in management and leadership roles by 10% by 2030, supported by fair recruitment, development and promotion practices.
- **Workforce Well-being:** Maintain employee engagement and well-being initiatives, including access to physical and mental health support, with regular internal review.
- **Patient Care and Safety:** Continue to monitor patient outcomes, quality indicators and patient experience feedback in line with NHS clinical governance standards, using insights to drive continuous improvement.

### Governance Targets

- **Board Oversight:** Ensure ESG matters, including climate, workforce and clinical governance considerations, are reviewed by the Board at least annually and integrated into relevant strategic and investment decisions.
- **Ethical Conduct and Compliance:** Maintain 100% staff completion of mandatory training on ethics, data protection and whistleblowing procedures, with annual policy reviews.
- **Modern Slavery and Supply Chain:** Devise a Modern Slavery statement to be reviewed annually and engage key suppliers on responsible business practices where practicable.

### Conclusion

OHG recognises that its ESG priorities will evolve as the Group expands services and infrastructure. The Board is committed to maintaining a proportionate, credible and healthcare-appropriate ESG framework that supports NHS partnership, regulatory compliance and long-term value creation.

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### Board approval

This statement was approved on Friday 24<sup>th</sup> April 2026 by our board of directors.



Adam Binns, Chief Executive  
24<sup>th</sup> April 2026