

*Public*

## **Environmental, Social and Governance Policy**

### **Applicability**

This policy applies to all divisions, subsidiaries, departments, and associated organisations within Twin. It is binding on all employees, contractors, and stakeholders engaged in activities on behalf of the Group, regardless of business unit or location. All members of the Group are expected to adhere to the principles, standards, and requirements set out herein.

Archbury Holdings Limited has adopted this policy of Twin Training International Limited at acquisition of some of its subsidiaries. These policies remain in place until December 2026. Over this time Archbury Holdings Limited will review these arrangements and implement its own policy

### **Introduction**

At Twin, our mission is to help people realise their full potential through life-enhancing experiences. Our reach spans local, regional, national, and international levels, with staff working globally to create meaningful experiences that support sustainable development.

We are dedicated to providing high-quality services while promoting the wellbeing and progression of our staff. Through our values, we aim to support and develop our staff, partners, and stakeholders to understand and recognise the impact they make on our planet in its broadest sense.

To achieve this, we are embedding an Environmental, Social, and Governance (ESG) culture throughout our organisation. Our ESG policy and framework are aligned with the United Nations Educational, Scientific and Cultural Organization (UNESCO) Sustainable Development Goals (SDGs). UNESCO is a UN agency that works to promote education, culture, science, and sustainable development worldwide. By linking our ESG work to the SDGs, we make sure our actions support global priorities and have a positive impact on society and the environment.

As part of a self-assessment, and to support the development of our 10-year strategic plan, Twin has developed an ESG Framework focusing on the following SDGs:

1. No poverty
2. Good health and wellbeing
3. Quality education
4. Gender equality
5. Sustainable cities and communities

## 6. Climate (environmental) action

Progress toward these SDGs will be measured and reported to Board. Data will be collected on relevant initiatives, staff and stakeholder engagement, and environmental outcomes, with regular reporting to senior management and stakeholders to ensure transparency, accountability, and continuous improvement.

### **Purpose**

The purpose of this Environmental, Social, and Governance (ESG) Policy is to:

- Define Twin's commitment to sustainable and responsible business practices across all operations.
- Provide a clear framework for embedding ESG principles into decision-making, service delivery, and organisational culture.
- Promote environmental stewardship, social responsibility, and strong governance in line with global best practices and the United Nations Sustainable Development Goals (SDGs).
- Guide employees, subcontractors, partners, and stakeholders in understanding their roles and responsibilities in supporting the organisation's ESG objectives.
- Ensure transparency, accountability, and continuous improvement in ESG performance across all business areas.

### **Scope**

This policy applies to:

- All employees, volunteers, and contractors of Twin, including those working across local, national, and international operations.
- Subcontractors, partners, and external stakeholders involved in the delivery of services or supporting Twin's operations.
- All business activities, including teaching and learning programmes, administrative functions, commercial operations, and community engagement initiatives.
- All platforms, digital systems, and physical environments used in the conduct of the organisation's business, ensuring alignment with ESG principles.
- Any initiatives, projects, or programmes undertaken in the name of the organisation, including partnerships and collaborations with other organisations.



Reviewer: Executive Team  
Version: 4  
Review date: 01/03/2026  
Next reviewed: 01/03/2027  
Document Number: GOV-007-R4

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## 1. Environmental, Social, Governance Framework

Our business, like every business, is deeply intertwined with environmental, social, and governance (ESG) concerns. It makes sense, therefore, that a strong ESG proposition can create value, and through this policy, we will provide a framework for understanding the keyways it can do so.

### ESG Definitions

|          |                                                                                                                                                                                                                                                                                                                                                                 |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>E</b> | <b>Environmental criteria:</b> includes the energy our company takes in and the waste it discharges, the resources it needs, and the consequences for living beings as a result. Not least, E encompasses carbon emissions and climate change. All companies in the Group use energy and resources; every company affects, and is affected by, the environment. |
| <b>S</b> | <b>Social criteria:</b> addresses the relationships our company has and the reputation it fosters with people and institutions in the communities where we do business. S includes labour relations and diversity and inclusion. Every company in the Group operates within a broader, diverse society.                                                         |
| <b>G</b> | <b>Governance:</b> is the internal system of practices, controls, and procedures our company adopts in order to govern itself, make effective decisions, comply with the legislation, and meet the needs of external stakeholders. Every company in the Group, which is itself a legal entity, requires governance.                                             |

Just as ESG is an integral part of how we operate, its individual components are closely interconnected. For instance, social considerations often intersect with environmental responsibilities and governance requirements, particularly when complying with environmental regulations and broader sustainability goals.

While this policy emphasises environmental and social criteria, governance remains equally critical and inseparable. Our approach to governance includes rigorous monitoring, reporting, risk management, and mitigation, ensuring that Twin remains a continuously improving and learning organisation. We work closely with regulators to embed best practice and seek expert advice and guidance wherever necessary.

## 2. Environmental Sustainability

The Directors of Twin are committed to the following:

- Continual improvement in the environmental impact of its business activities
- Improving the environmental benefits provided by its delivery of employability and skills programmes
- Preventing pollution
- Complying with all relevant legal, customer, and other third-party requirements

- Establishing measurable environmental and business objectives that are consistent with the context and strategic direction of the organisation and addressing risks and opportunities associated with them
- Achieving objectives to help minimise its environmental impact
- Adopting best practices applicable to its activities wherever practicable
- supporting the outcomes outlined in SDG 11,
- conserve natural resources

The organisation will achieve these commitments by:

- Implementing and maintaining an Environmental Emergency Response Process that is independently certified as compliant with ISO 14001:2015
- Employing processes that identify the aspects of the organisation's business that have an environmental impact and quantifying the significance of each aspect
- Maintaining an environmental performance improvement programme to enable the organisation's objectives to be achieved
- Ensuring that its employees, suppliers and customers are aware of their role in supporting the organisation's commitments and environmental objectives
- Training its employees in good environmental protection practices and encouraging employee involvement in environmental improvement initiatives
- Continually monitoring the environmental impact of its business activities

As an organisation, we enable all stakeholders to reduce their environmental impact by:

- Operating in accordance with relevant laws, regulations, and professional codes of practice.
- Disposing of waste through local council recycling collection points.  
Ensuring our subcontractors dispose of their waste using registered waste collectors.
- Observing and complying with the Waste Electrical and Electronic Equipment (WEEE) regulations, ensuring WEEE is not mixed with general waste and is disposed of legally.
- Continuously improving our environmental performance.
- Educating and training employees and beneficiaries to carry out their activities in an environmentally responsible manner.
- Working closely with regulatory bodies, environmental organisations, and other relevant stakeholders on environmental issues.

Our objectives and target areas include:

- Review energy consumption.
- Waste reduction including packaging and paper.
- Recovery and recycling programmes

Where possible as an organisation, both management and staff share the commitment to:

- Work in accordance with the intent and practices of our environmental policy.
- Report and communicate any incidents or ideas which may assist the management to review the process, prevent recurrence, and improve performance.
- Ensure staff are trained in environmental awareness to facilitate best practice.

- It is our intention that the systems described here should be implemented and the policy, organisation and systems be periodically reviewed and amended to ensure that they are appropriate and up to date.

### **3. Implementation**

The management team will as part of their duties ensure that all staff are aware of their responsibilities and information that they need. In particular, they will ensure that all new staff or other relevant people are aware of our Environmental and Sustainable Development policy and procedures and that provisions are maintained and reviewed regularly by including environmental management as a standard agenda item at team meetings.

Twin will ensure that subcontractors are aware of the policy and their obligations to work within its parameters. This will fall part of the organisation's monthly review meetings with subcontractors ensuring promotion of sustainability in line with legal requirements and regular monitoring of progress against actions identified in the subcontractors' Sustainability action plan.

### **4. General Procedures**

The organisation will ensure that as far as is reasonably practicable, environmentally friendly working procedures are adopted and used. These include:

- Encouraging the use of public transport and cycling.
- Using recycled paper and double-sided printing wherever possible.
- Recycling files, folders, plastic pockets, and other reusable stationery items.
- Sending used toner cartridges back to suppliers for recycling.
- Conserving energy by switching off monitors, lights, and photocopiers when not in use.
- Using environmentally friendly light bulbs and working with suppliers and partners who share our commitment to sustainability wherever possible.
- Using digital tools efficiently to reduce energy consumption and waste, particularly for staff working remotely.

Our success with this policy will come from the individual and from teamwork to ensure effective implementation and adherence across the organisation. Mobility is built into all services, enabling our employees and our clients' employees to telecommute when appropriate, reducing environmental impact of commuting to offices.

In addition:

- We facilitate environmentally responsible technology hardware recycling for both our internal company and clients' hardware.
- When selecting new office locations, we seek out buildings with environmental certifications and strong commitments to sustainability policies.

- We promote reuse and recycling within all of our office locations, by providing reusable glassware/silverware/plates and recycling receptacles for glass/paper/metal.
- As a horizontal principle in all teaching and learning, we will embed environmental awareness into all teaching and learning programmes to ensure all participants are aware of and are able to effectively impact environmental outcomes.

## 5. Social Value (Responsibility/Sustainability)

We're committed to being a socially responsible employer by fostering an environment of diversity and inclusion across our business, operating ethically, and supporting our local communities in alignment with SDG 3, 5, and 11. We aim to provide measurable social value and impact for our staff, participants, partners, communities, and the commissioners/contracts we deliver.

Our employees are at the core of the service we provide, and we are committed to giving members of our team a workplace that is inclusive, rewarding, and empowering. All staff are provided with 2 days of paid volunteering per year, and we actively encourage take-up of this across the organisation. This is supported by company-organised community service opportunities across the locations where we operate.

### Twin Social Value Commitments

1. Support all Twin participants in going above and beyond contractual commitments.
2. Provide Twin staff with opportunities to support communities and good causes.
3. Give back to Twin partners, businesses, and communities through additional activity.
4. Support young people and communities in accessing opportunities to achieve their potential.
5. Provide advice and guidance for partners in developing and meeting their social value commitments.

Through these commitments, we aim to embed social responsibility into everything we do, ensuring that our impact extends beyond contractual obligations to deliver meaningful benefits for society and our wider ecosystem of stakeholders.

**Staff Social Value:** The talent of our team is one of our strongest assets and we strive to always recognise the value of every team member. We do this through equitable and competitive compensation and seek to nurture internal talent and promote from within whenever possible, through staff training pathway supporting social mobility/progression and career enhancement. We also provide comprehensive health benefits, employee assistance programme, a contributory pension scheme, paid time off, paid family leave, disability coverage, and where possible flexible working conditions, a positive work-life balance. Employees are supported with continuous and professional development, receive annual performance reviews, participation in employee opinion surveys, receive all staff 'townhall' updates and provided with a staff voice in development of services and support for Twin

programmes. We also provide employees with a wellness program that incorporates education to promote awareness across four key pillars: physical, nutritional, financial and mental wellness.

## **6. Commitment to Diversity & Inclusion:**

We fully recognise the opportunity to promote diversity within our industry, and across many sectors. This is especially true in terms of promoting representation at all levels from women and people of colour, especially amongst senior management. This is an area we continue to target and which we are currently excelling at. Our first step has been to ensure we publish data on the racial and gender composition of our employees. Going forward, we will update this ESG policy statement bi-annually to track our progress in recruiting a diverse workforce. The current data shows that continuing to ensure new hires are a diverse group is important, but focusing on inclusion and career development is equally important in line with our commitment to SDG 5 – Gender Equality.

## **7. Twin Social Value Impact**

Across all Twin operations, our services seek to go above and beyond contractual responsibilities and provide additional social value to partners, communities and individuals we support. Our social value consists of impact we provide without financial incentive, in many contacts we hold social value commitments have been made aligned specifically to its delivery. The support we provide extends to our partner network including 3SC partnership network, over 50% partners identifying as VSE organisations receive free associate memberships with access to newsletters, webinars, CPD and sector networking. Social value commitments are held across all areas of delivery including:

- Employability: i.e. employer engagement, arranging community jobs fairs, and supporting youth employment via schools engagement
- Skills: i.e. providing SEND specialist support via apprenticeships and providing tutors discretionary time to allow additional learner engagement
- Neurodiversity: i.e. delivering free webinars raising awareness, destigmatising and offering best practice to organisations and individuals

Social value commitments per contract include commitments to support local communities, including local employment and meeting local and regional priorities.

## **8. Corporate Governance**

We're committed to building a culture dedicated to ethical business behaviour and responsible corporate activity. To provide transparency and avoid conflicts of interest, we actively engage outside auditors to conduct the following:

- Annual SOC 1/2 Examination

- Annual Financial & Accounting Audit
- Cyber essentials plus
- Matrix Standard
- ESFA Financial Health Check
- Commitment to Equality
- Ofsted and QQI to assess the quality of our educational programmes in line with SDG 4

Employee engagement/satisfaction surveys to identify and support engagement / involvement / health and wellbeing indicators SDG 3

## **9. Oversight**

The CEO of Twin oversees the implementation and impact of our ESG initiatives and continuously strives to foster dialogue on these issues amongst our employees and other stakeholders through a range of different online, digital and face to face mechanisms such as think tanks, policy research and development, staff surveys, external engagement with partners and employers, standards accreditation, focus groups and publishes articles.

Through internal governance process and systems, all ESG initiatives are monitored, reported, are scrutinised and challenged through root cause analysis and risk assessments, underpinned through SMART action plans and impact evaluation.

## **10. Creating sustainable outcomes**

We will use a sustainability scorecard to track our performance and improve our ESG reporting. We will track our ESG-related initiatives at every level using a range of OKR's (Objectives and Key Results) and KPIs (Key Performance Indicators) regarding the social, environmental, and economic aspects of the business, supporting business sustainability. We will share the outcomes of the scorecard with the Group and also its stakeholders.

## 11. UNESCO Goals

