

# Stronger together, driving positive outcomes

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DWF Group plc  
ESG Impact Report  
2021/22



# About us

## Who we are

DWF is a leading global provider of integrated legal and business services.

## Our purpose

Delivering positive outcomes with our colleagues, clients and communities.

## What we do

We have listened to our clients and there is a growing desire for legal and business services to be delivered in an easier and more efficient way. So, we've built our range of services on this principle.

## How we do it

We have three offerings – Legal Advisory, Mindcrest and Connected Services. Our ability to seamlessly combine any number of these services to deliver bespoke solutions for our clients is our key differentiator. Delivered through our global teams across eight core sectors, our Integrated Legal Management approach delivers greater efficiency, price certainty and transparency for our clients without compromising on quality, service or values.

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# Our strategic pillars

## Climate action



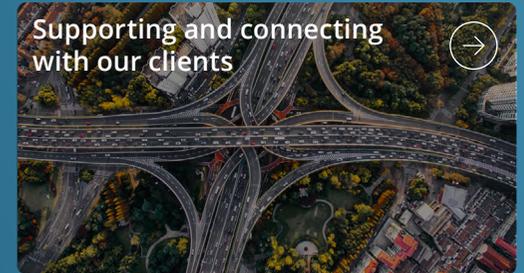
## Diversity & Inclusion



## Empowering colleagues and our communities



## Supporting and connecting with our clients



## Acting with integrity in everything we do



## Building trust and increasing transparency



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# Highlights of 2021/22

## Approved science-based target

The Science Based Targets initiative has validated our corporate greenhouse gas ('GHG') emissions reduction target ambition and determined it is in line with a 1.5°C trajectory.

DWF Group plc commits to reduce absolute Scope 1 and 2 GHG emissions 50% by 2030 from a 2019 base year. DWF Group plc also commits to reduce absolute Scope 3 GHG emissions by 50% within the same timescale.



SCIENCE  
BASED  
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

36%

Executive Board roles held by women

54%

promotions achieved by women

61%

of DWF premises using renewal energy

£317,725

awarded to charities by the DWF Foundation  
(includes £100,000 to support humanitarian efforts in Ukraine)

20,294

training hours completed

76%

Our Employee Engagement Index

## Some of our accreditations awarded during 2021/22



## CEO & Chair statement



Doing the right thing defines who we are, and the increased emphasis on ESG and the expectations of businesses to respond appropriately are both welcome and necessary. The challenges facing the world are substantial, in some cases daunting, but all businesses have a responsibility to do more to tackle them, and to operate responsibly and contribute positively to a sustainable future for generations to come.

**“A responsible and sustainable approach to doing business is central to our purpose of delivering positive outcomes with our colleagues, clients and communities, and is evident throughout this inaugural ESG Report.”**

Our position as the only Main Market listed legal business gives DWF a unique perspective on ESG. We share the scrutiny and transparency that regulators, and all stakeholders, expect from clients and have learned important lessons about implementing effective ESG policies. This also means committing to consistent high performance around ESG is fundamental to our success as a global legal business, specifically in terms of delivering our Group strategy, realising commercial advantage, and in retaining and attracting key talent.

**“We are pleased that DWF reaffirms its support of the Ten Principles of the UN Global Compact in the areas of human rights, labour, environment and anti-corruption, and contributes to the UN Sustainable Development Goals.”**

It includes ambitious science-based targets through which the DWF Group commits to reducing carbon emissions in line with the Paris Agreement, along with stretch targets to improve our diversity. This sits alongside our focus on strengthening the resilience of our communities and continued prioritisation of the wellbeing of our colleagues globally, particularly addressing the ongoing challenges of navigating our way through COVID-19.

We have set and are committed to a range of ESG targets that we know will be challenging, but, given the scale and urgency of action required, high ambition is necessary. We will work with our colleagues, clients and wider stakeholders to educate, engage, support and collaborate along this journey to a fairer and more sustainable world.

The long-term impact of the global pandemic coupled with the appalling conflict and humanitarian crisis following Russia's assault on Ukraine have redefined how we integrate ESG even further into our business. As we respond to these challenges, DWF's resolve to be a leader in responsible and sustainable best practice remains strong, directed through a clear and measured strategy aligned to the UN's 2030 agenda and a 1.5°C pathway.

Thank you for taking the time to read our very first ESG Report. We welcome your feedback and look forward to providing updates on our efforts to scale our collective impact and ambition globally.

**Sir Nigel Knowles**  
Group Chief Executive Officer



“The Board is committed to strategically integrating and advancing our ESG efforts in line with our purpose and values. In doing so, we are creating and sustaining a business that is diverse and inclusive for all colleagues, empowering young people in areas with low social mobility to enter the world of work. We are raising funds to enable the DWF Foundation to provide grants to charities whose work impacts people in locations where we have a presence, donating our time and skills to tackle local social issues. Through science-based targets and a 1.5°C trajectory, we are minimising our impact as a low-carbon and more circular business whilst ensuring a zero tolerance approach to modern slavery and human trafficking in our supply chain.”

**Jonathan Bloomer**  
Chair

# Group Head of ESG



**“Our stakeholders are increasingly prepared to challenge how we do business, where and who we do business with and the level of our ambition and action to integrate and manage ESG risks into our business operations.”**

The publication of this ESG Impact Report is a pivotal first step towards robust and transparent annual ESG reporting across DWF Group plc. It covers the period from 1 May 2021 to 30 April 2022, but, because this is our inaugural report, refers to actions and events before and after this period.

Whilst this report is not independently assured, our Environmental, Social & Governance (‘ESG’) report within our ARA (which form the foundations of this report) is reviewed by our statutory auditor, PricewaterhouseCoopers.

We have included in this report the material topics we know our key stakeholders are most interested in, as well as those with the potential to impact DWF’s business.

Our materiality assessment, ESG Strategy and targets detailed within this report provide a framework that will ensure our sustained commitment and focus on how we do business, driving change for a better future for all our stakeholders.

The actions we are taking are also prioritised to align and contribute to the UN Sustainable Development Goals (‘SDGs’) and the UN Women’s Empowerment Principles.

Our ESG ambition sets out the future we envision for our company and what we want to achieve in the coming years to 2030. The legal industry is changing and we are helping to set the pace as a progressive, innovative global business. We look forward to sharing our progress with you.

**Kirsty Rogers**  
Group Head of ESG

**Q This is your first ESG Report, but when did sustainability become an area of focus for DWF?**

DWF has supported the principles of sustainable development since it launched its first Corporate Responsibility Strategy back in 2011 which aimed to realise the opportunities arising from the management of our environmental and social responsibilities to create long-term value for our business. Our focus back then, as now, was to deliver a distinct and measured sustainability proposition which put delivery, not just commitment, at the heart of our approach.

**Q What motivated DWF to take this so seriously?**

We have always believed that we can be part of the global solution to climate change through a focus on both our direct and indirect environmental impacts. That said, being purpose driven and values led continues to be the overriding driver which has shaped how we do business. In doing so, we are realising our ambitions to deliver outstanding service to clients, make a positive impact on local communities, create and maintain a diverse and inclusive workplace, enhance our external profile and risk management credentials and, fundamentally, reduce our carbon footprint.

**Q What do you see as the biggest challenges and opportunities for DWF advancing its ESG agenda?**

We’ve set ourselves ambitious targets that will not be easy to achieve but will continue to transform the way we operate. In the short term, our biggest challenge is about ensuring we have access to automated ESG data to assess and drive progress so it can consistently inform decision making. This will be critical in showing our stakeholders that we continue to focus on long-term value creation and that we do business with clients and suppliers in an environmentally sustainable and competitive way.

# DWF at a glance

## Our values



### Always aim higher

We exceed the expectations of our colleagues and our clients in everything we do.



### Be better together

We listen, recognise and support each other to protect a diverse and inclusive culture and sustain our business, clients and communities.



### Disrupt to progress

We embrace change and new ways of working to enhance our performance and our reputation.



### Keep all promises

By keeping the promises we make to our colleagues and our clients, we build trust, loyalty and credibility.



### Attend to details

We achieve the best results to complex problems by focusing on simple and effective solutions.

## Our offerings

### Legal Advisory

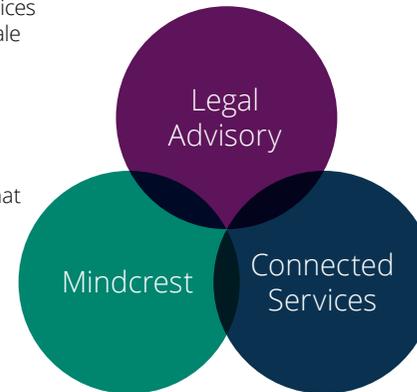
Premium legal advice and excellent client service. Our teams bring commercial intelligence and relevant industry experience.

### Mindcrest

Outsourced and process-led alternative legal services offering, designed to standardise, systematise, scale and optimise legal workflows for areas such as contract management and ensuring regulatory obligations are met for our customers.

### Connected Services

Our range of products and business services that enhance and complement our legal offering.



## Our differentiator

### Our Integrated Legal Management approach

Our ability to seamlessly combine any number of our offerings to deliver bespoke solutions for our clients is our key differentiator. Delivered through our global teams across eight core sectors, our Integrated Legal Management approach delivers greater efficiency, price certainty and transparency for our clients without compromising on quality or service.

For more information, see pages 12 and 13 of our Annual Report and Accounts (ARA)

## We act with purpose

To deliver positive outcomes with our colleagues, clients and communities

For more information, see page 2 of our Annual Report and Accounts (ARA)

## Revenue by division

### Legal Advisory

£292.0m

### Mindcrest

£24.4m

### Connected Services

£33.9m

## Where we operate

### DWF offices

- Australia
- Canada
- France
- Germany
- India
- Ireland
- Italy
- Poland
- Qatar
- Spain
- UAE
- United Kingdom
- United States of America

### Associations

- Hong Kong
- Kingdom of Saudi Arabia
- Portugal
- Republic of Singapore
- Republic of South Africa
- Turkey
- United States of America

### Sectors

- Consumer
- Energy & Natural Resources
- Financial Services
- Insurance
- Government & Public Sector
- Real Estate
- Technology, Media & Communications
- Transport

Whilst our headquarters is in the UK, we continue to build our presence globally through acquisitions, associations and lateral hires. This year we opened in Seville, our fourth office in Spain, and we established a new regional headquarters for business services in the Middle East, through the launch of our office in Riyadh. We also established a new association in Portugal and we announced our first Connected Services association.

# Our approach to sustainability

## The Group ESG Strategy has six priority areas:

To inform our strategic priorities and ESG metrics, we conducted a detailed independent materiality assessment in order to identify the issues that matter most to our stakeholders, and where we have the most potential to create value aligned with our purpose.

## Our approach

We have already made significant progress in embedding responsible business best practice. Our business conduct impacts our reputation and both are inextricably linked to the long-term value we want to create as a global business.

We focus our efforts on connecting our activities to our business purpose and values, to accelerate our ESG work and meet the needs of all our stakeholders. In doing so, we set the stage for long-term value creation determined by revenue, sustainability, impact and reputation.

As a force for good, we will continue to:

- create and sustain a skilled workforce today and for the future;
- deliver service excellence to grow and sustain our clients;
- build and strengthen our communities; and
- help to repair and sustain our planet.

## ESG operations



### Operational readiness

We mobilise the right people, processes and systems to deliver our strategy and meet our measurable targets

### Disclosures

We are responsive to disclose, in an efficient and timely manner, all information requested and required

### Transparency

We proactively share, in an efficient and timely manner, all information demonstrating 'transparency'

### Ways of working

We evolve our internal 'ways of working' to ensure everything we do aligns to our strategy demonstrating we're 'walking the walk'

### Promises & targets

We deliver the right initiatives to achieve our measurable targets

## Climate action

Recognising our role as a responsible business in supporting the global transition to a sustainable low-carbon economy. Our aim is to be Net Zero by 2030.

## Diversity & Inclusion

Accelerating progress to improve representation and diverse talent pipelines.

## Empowering colleagues and our communities

Sustaining a skilled workforce today and for the future, continuing to prioritise colleague health and wellbeing, and taking action to help and collaborate with communities in need.

## Supporting and connecting with our clients

Being clear and transparent about how we can help clients to improve their sustainability performance through an ESG-centric approach.

## Acting with integrity in everything we do

Taking ownership and holding ourselves accountable for the way we do business.

## Building trust and increasing transparency

Enhancing the credibility of our own ESG disclosure, consistent with our purpose of delivering positive outcomes with our colleagues, clients and communities.

# Listening and responding to our stakeholders

## Engaging and responding to stakeholders is fundamental to being a responsible business.

The relationships we build and sustain are critical to delivering our strategy and ensuring long-term value. Through dialogue and listening, we can better understand our impacts and evolving stakeholder expectations. In turn, our stakeholders expect us to provide accurate, transparent information about our performance, ESG risks, and the measures we are taking to address them.

We use a range of engagement mechanisms in order to understand and consider stakeholder views.

### Our stakeholders

#### Stakeholder group



#### Our colleagues

Our colleagues are the heart and soul of our business and the key to its success. We understand that it is vital that we recruit, retain and develop the best people. By doing this, we will be able to implement our strategy and fulfil our purpose.



#### Our clients

Clients are integral to everything we do, and so it is important we understand how we need to evolve to provide them with the right support.



#### Our communities

We believe that we can build thriving communities in which we live and work, create a skilled and inclusive workforce today and for the future, and innovate to repair and sustain our planet.



#### Our suppliers

Effective and trusted relationships are key and we engage to ensure suppliers are providing value for money, performing to our standards and conducting business to our expectations for a mutually beneficial relationship.



#### Our Shareholders

Our Shareholders play an important role in monitoring and safeguarding the governance of our Group. Some are also colleagues and partners, who have a critical role to play in the continued success of our business.

#### How we engage

- Virtual Town Halls
- Weekly email and recorded video briefings from the Group Chief Executive Officer to all colleagues
- Global Pulse Surveys
- Rubix, our Company intranet
- Rubies and Achievers colleague recognition platforms
- Key Account Programme with a dedicated Executive Board sponsor
- Client Census to discover satisfaction metrics and key themes of feedback
- Client Relationship Partners
- Collaboration to advance shared values and mutual goals
- Volunteering in local communities
- Charitable giving by the DWF Foundation
- 5 STAR Futures, our community education programme, workshops and awards evening
- Pro bono work
- Through Business in the Community
- Through a fair and consistent evaluation process
- Use of competitive Request for Proposal ('RFP') processes where appropriate
- Regular review meetings with key suppliers
- Ongoing feedback to maintain openness and to improve value from supplier relationships
- Financial reporting and trading updates
- A series of events throughout the financial year, including our AGM, and presentations of half-year and full-year results
- Management attend relevant conferences and meet with investors and potential investors throughout the year

### Impacts and outcomes

- Dialogue and listening enables us to have a clear understanding of ESG-related concerns and creates the impetus to deliver on our 2030 responsible business agenda.
- Robust and transparent stakeholder engagement enables us to identify our priority (material) issues in partnership with our stakeholders.
- In meeting the shifting expectations of our stakeholders, we are raising the bar, mutually agreeing the standard for integrity, trust and quality.

For more details on how we engage with our key stakeholders, refer to pages 28 to 31 of our Annual Report and Accounts (ARA)



# Materiality process

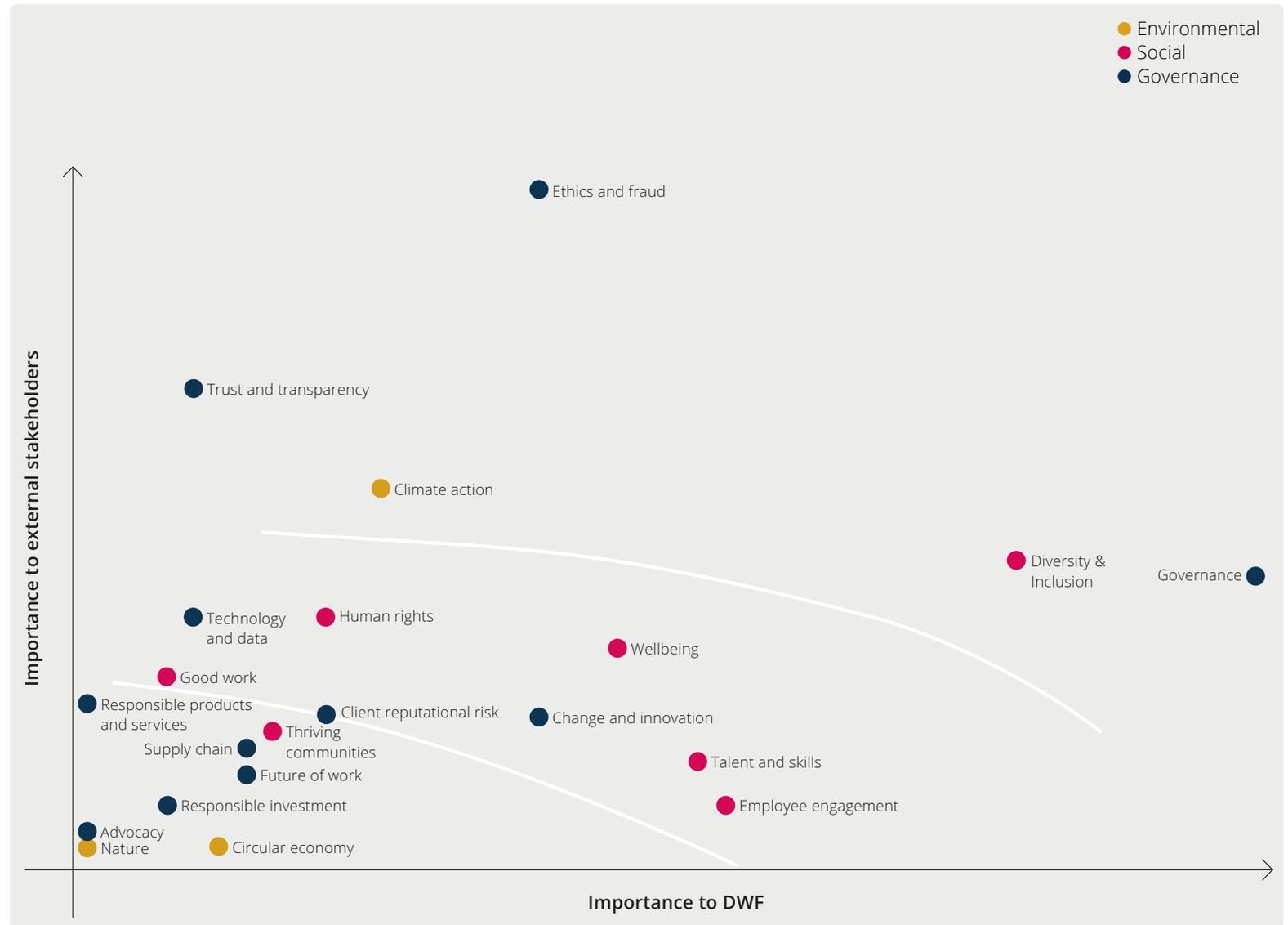
To inform our strategic priorities and metrics, we conducted a detailed independent Materiality Assessment to identify issues that matter most to our stakeholders, and where we have the most potential to create value aligned with our purpose.

DWF worked with Business in the Community ('BITC') to identify the issues and determine where we needed to take action. BITC is the oldest and largest business-led membership organisation dedicated to responsible business, founded by HRH the Prince of Wales.

Our Materiality Assessment was conducted between March and September 2021, and involved extensive desk research on key trends and UK governance requirements, stakeholder mapping and various methods of engagement such as interviews with senior leaders, clients and suppliers, a colleague survey and colleague focus groups. The survey took place in July 2021 and was circulated to all DWF colleagues – 1,232 (31%) colleagues responded.

Based on the internal and external analysis, 23 material issues were identified. This list combines and categorises similar issues arising through the internal and external analysis, e.g. gender and the gender pay gap became part of Diversity & Inclusion. A prioritisation exercise allowed for strategic focus and resulted in the six priority areas identified within the ESG Strategy launched publicly in December 2021.

The launch of the strategy followed a comprehensive review of business processes and behaviours alongside the completion of the Materiality Assessment.



# The Sustainable Development Goals

- Key**
- Climate action
  - Diversity & Inclusion
  - Empowering colleagues and our communities
  - Supporting and connecting with our clients
  - Acting with integrity in everything we do
  - Building trust and increasing transparency

For any given company, contribution to the UN SDGs will vary based on the nature of the business, sector and where it can have meaningful impact. While we believe we contribute to all 17 SDGs, we have prioritised five goals where we can make the most impact.

	Description	Our actions	Pillar
 <p><b>Gender Equality</b></p>	<ul style="list-style-type: none"> <li>Ensure women's full and effective participation and equal opportunities for leadership</li> <li>Adopt and strengthen policies for promotion of gender equality and empowerment of all women and girls</li> </ul>	<ul style="list-style-type: none"> <li>We continue to be named in the Times Top 50 Employers List for Women, 2020, 2021 and 2022</li> <li>We raised the level of our ambition through new stretch targets to increase female representation across senior management (see <b>page 16</b>). Women represent 30% of our PLC Board and 36% of our Executive Board</li> <li>We enhanced our family friendly policies (see <b>page 23</b>)</li> <li>We continued to participate in Target Gender Equality, to help implement the Women's Empowerment Principles and strengthen our contribution to SDG 5</li> </ul>	
 <p><b>Decent Work and Economic Growth</b></p>	<ul style="list-style-type: none"> <li>Protect labour rights and promote safe and secure working environments for all</li> <li>Achieve full and productive employment and decent work for all women and men and equal pay for equal work</li> </ul>	<ul style="list-style-type: none"> <li>We continue to embrace flexible and agile ways of hybrid working to sustain a high-performing, inclusive workplace</li> <li>We are and have been a Living Wage Employer since 2014 and have embedded fair pay principles</li> <li>We continue to disclose our gender pay gap, voluntarily disclose our ethnicity pay gap and share progress to close the gap (see <b>page 38</b>)</li> <li>As a signatory to the Mindful Business Charter, we actively encourage a culture of openness to remove avoidable stressors in the workplace and stigma surrounding mental health</li> </ul>	
 <p><b>Reduced Inequalities</b></p>	<ul style="list-style-type: none"> <li>Empower and promote the social, economic and political inclusion of all</li> <li>Ensure equal opportunity and reduce inequalities of outcome</li> </ul>	<ul style="list-style-type: none"> <li>We launched our latest five-year global Diversity &amp; Inclusion ('D&amp;I') Strategy in May 2021</li> <li>We expanded our community reach (via technology) through our award winning 5 STAR Futures programme, designed to increase confidence and attainment of young people in areas of financial and economic deprivation</li> <li>To support charities experiencing a drop in revenue, we launched online training sessions to offer guidance on applications to the DWF Foundation and/or other charitable foundations</li> <li>We are continuing our programme of educational blogs and webinars focused on gender balance, anti-racism, faith, culture, flexible working, LGBT+ inclusion, disability, neurodiversity, menopause, mental health and wellbeing for our colleagues, clients and communities</li> </ul>	
 <p><b>Climate Action</b></p>	<ul style="list-style-type: none"> <li>Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters</li> <li>Improve education, awareness-raising and capacity on climate change management</li> </ul>	<ul style="list-style-type: none"> <li>We launched our ESG Strategy following approval from the PLC Board</li> <li>We publicly disclosed the level of our ambition with approved science-based targets aligned to a 1.5°C trajectory</li> <li>We began to roll out Carbon Literacy Training for our colleagues</li> <li>We developed our roadmap to Net Zero by 2030</li> </ul>	
 <p><b>Peace, Justice and Strong Institutions</b></p>	<ul style="list-style-type: none"> <li>Promote the rule of law at the national and international levels and ensure equal access to justice for all</li> <li>Promote and enforce non-discriminatory laws and policies for sustainable development</li> </ul>	<ul style="list-style-type: none"> <li>All our colleagues are guided by our Code of Conduct, which requires ethical and socially responsible behaviour from all colleagues including our Board of Directors</li> <li>We have a zero tolerance policy for bribery and corruption, with no reported incidences in the last financial year</li> <li>We prohibit forced labour, child labour and human rights abuses and published our fifth Modern Slavery Statement, which confirmed no reported incidences of modern slavery in our operations or within our supply chain</li> <li>We updated our Human Rights Statement in 2022</li> </ul>	

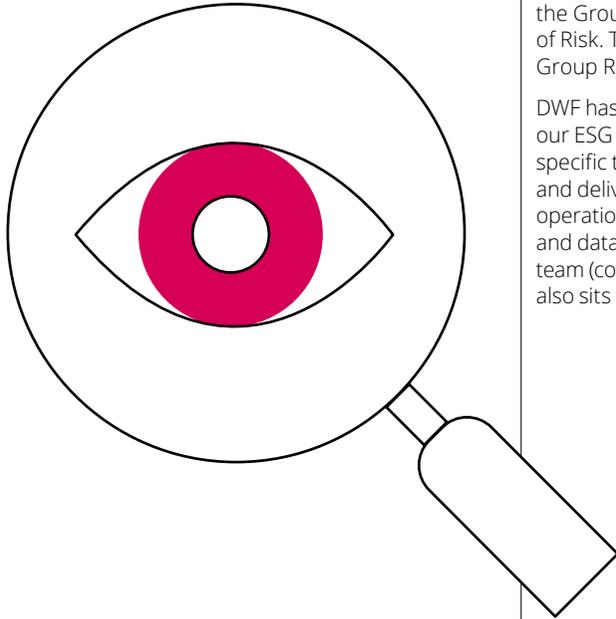
# Our ESG governance

The ESG issues most important to all stakeholders of the DWF Group are contained in the ESG Strategy, which has the engagement of and accountability from our PLC and Executive Boards, along with all levels of leadership across our business.

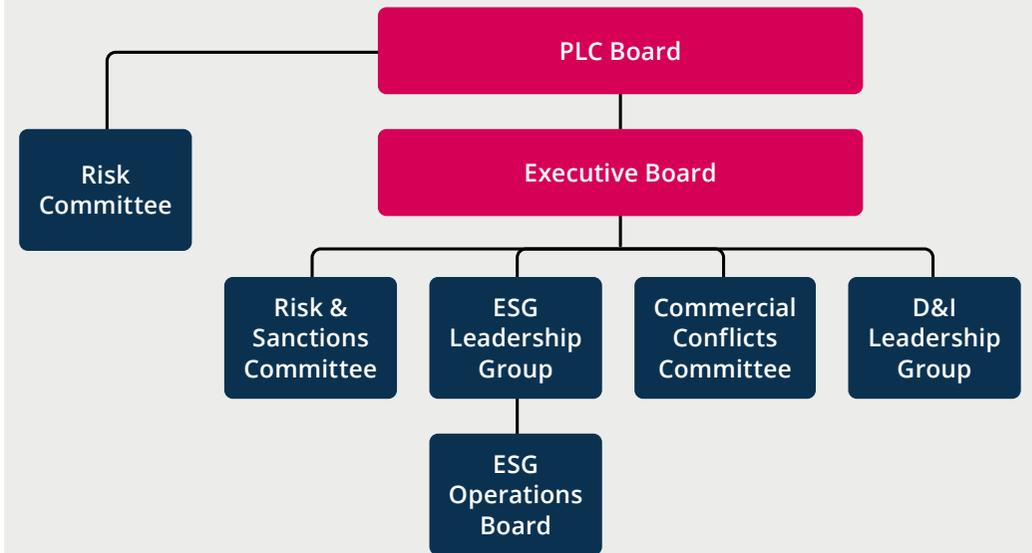
The oversight provided by the Board and its committees, which include our ESG Leadership Group, ESG Operations Board and Risk & Sanctions Committee, is guided by DWF's Code of Business Conduct, which applies to every DWF Board member and colleague.

The Group Head of ESG reports quarterly to the Executive Board and at least bi-annually to the PLC Board, on progress to date, ESG risks and opportunities, and any actions necessary to ensure we are evolving our ESG Strategy and continually meeting the expectations of both internal and external stakeholders. The Group COO is part of the ESG Leadership Group and meets fortnightly with the Group Head of ESG, as does the Group Director of Risk. The Group Head of ESG sits within the Group Risk and Excellence function.

DWF has invested heavily in resource to support our ESG agenda with a number of new roles specific to ESG being created to implement and deliver our strategy, including: sustainability, operations, business development, environmental and data management responsibilities. Our new ESG team (comprising five full-time equivalent members) also sits within our Risk and Excellence function.



ESG governance structure



# Our ESG governance continued

## Responsible Business Tracker



The Responsible Business Tracker is a measurement tool designed to assess performance as a responsible business by tracking progress against Business in the Community's Responsible Business Map. The Inner Map assesses the extent to which businesses are integrating responsible business into their business model.

The Outer Map assesses the extent to which businesses are creating societal and environmental value.

We ranked Diversity & Inclusion and Climate Action as our top two material issues:

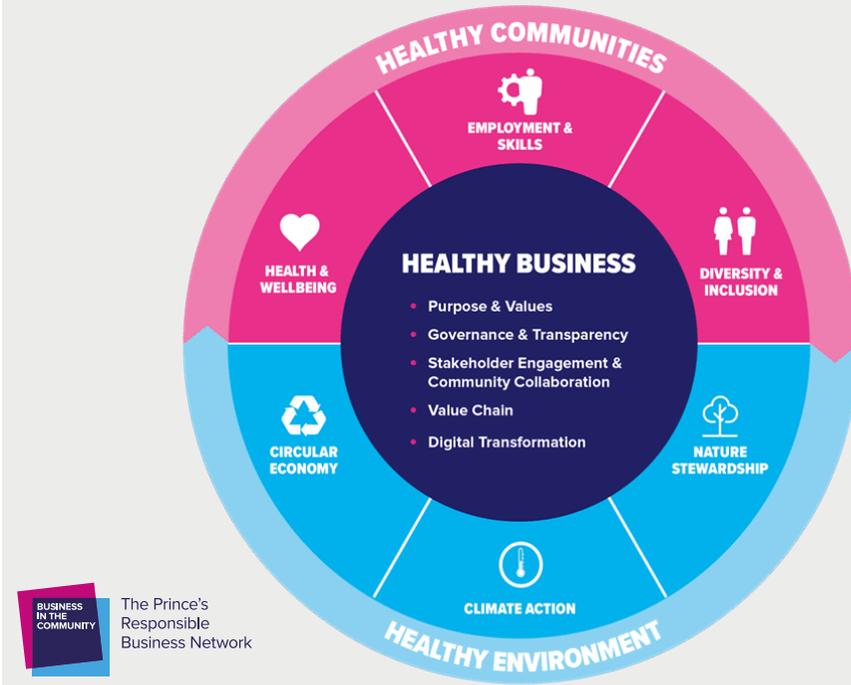
- With an overall score of **98%**, DWF led the entire cohort on its work around D&I
- On Climate Action, our overall score was among the highest in the cohort, at **78%** against a maximum cohort score of 87%

Our Tracker results also highlighted some areas where we need to further develop our approach – ensuring impact mapping extends across our entire products and services offering, and doing more to build resilience of urban and rural landscapes as part of our plans around nature stewardship.

**“One of the key takeaways from DWF’s Responsible Business Tracker report in April 2020 was the need to undertake a formal materiality assessment in consultation with external stakeholders. It’s great to see DWF take that even further. By utilising stakeholder collaboration to identify key issue areas and material concerns, the rationale connecting the programmes you run has improved and, with that, the measurement of your impact.”**

**Assessor Feedback**  
BITC

## BITC Responsible Business Map



## Responsible Business Tracker

We continue to use BITC's Responsible Business Tracker to monitor and evaluate our progress. DWF was one of the forerunner businesses to first use the Tracker back in 2019.

The Tracker and Responsible Business Map align with the UN Sustainable Development Goals.

### Our Tracker Score

**66%** DWF  
**47%** Cohort average  
**90%** Cohort maximum



# Climate action

## Our approach

We are committed to a science-based approach to reduce our climate impact.

We have set an aggressive science-based validated target for carbon reduction in line with a 1.5°C pathway that addresses our Scope 1, 2 and 3 emissions. We focus on actual reductions in our emissions by cutting energy use, transitioning to renewables, significantly reducing the frequency and carbon intensity of commuting and business travel, and investing in solutions that remove carbon from the atmosphere.



We aim to excite and inspire colleagues to drive meaningful impact and foster an enlightened attitude around business travel to sustain the reduced levels of commuting and business travel emissions seen during the pandemic. Every one of our colleagues will need to play a part in reducing both the frequency and the carbon intensity of their commuting and business travel as we evolve new ways of working, where colleagues travel with our purpose in mind, as they connect and collaborate with each other, our clients and within our communities.

We publicly support and report in line with Task Force on Climate-Related Financial Disclosures ('TCFD') and, through investment in carbon removal projects, will achieve Net Zero in our global operations by 2030. Our ambition, which also includes zero waste to landfill, a net positive water impact and 100% resource recovery, with all materials and products recovered, recycled or reused at their end of use, will build our resilience and place us at the forefront of disclosure within our sector on climate risks and opportunities.

### Why it matters

If left unchecked, climate change will adversely affect every ecosystem, disrupt national economies and will increase the fragility of business models and supply chains. Our strategy is to focus on reducing emissions within our direct control, being clear about the level of our ambition, rather than reducing emissions at a slower rate.

To achieve our purpose, our colleagues, clients and communities expect us to take immediate action, and rightly so. Doing nothing will end up costing us a lot more than if we take action now – we risk losing talent and clients to competitors and we will likely lose investors, brand credibility and market relevance – all of which would reduce our ability to generate revenue.



SCIENCE  
BASED  
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

### Targets

- DWF Group plc commits to reduce absolute Scope 1 and 2 GHG emissions 50% by 2030 from a 2019 base year.
- DWF Group plc also commits to reduce absolute Scope 3 GHG emissions by 50% within the same timescale.

### Science Based Targets initiative ('SBTi')

We are delighted to have our global 2030 Net Zero target verified by the Science Based Targets initiative as we double down on efforts to reduce our impact on climate change across our Scope 1, Scope 2 and Scope 3 emissions.

The validation of a Net Zero target by the Science Based Targets initiative provides a defined, long-term pathway to reduce greenhouse gas emissions consistent with limiting global temperature rise to 1.5°C.

# Climate action continued

## Roadmap to Net Zero

2011: embarked on our sustainability journey and developed our Environmental Management System ('EMS')

Certification to new Standard ISO 14001:2015



SCIENCE  
BASED  
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION



DISCLOSURE INSIGHT ACTION

25% reduction across Scopes 1, 2 and 3

**Key milestones:**

- 2012: EMS certified to ISO 14001:2004 Standard
- 2012–2018: remained under our target of not exceeding 3 tonnes per person per year of CO<sub>2</sub> emissions.
- 2019: transitioned to new ISO 14001:2015 Standard

Commitment to setting SBTi targets in line with the 1.5°C pathway

Targets sent to SBTi for validation

Targets validated by the SBTi

Completion of Carbon Disclosure Project and annually thereafter

TCFD report in ARA

Re-certification to ISO 14001:2015

Ambition to be Net Zero

# Net Zero

Pre-2021

2021:  
March

2021:  
June

2021:  
December

2022:  
June

2022:  
July

2022:  
August

2024:  
March

2025:  
December

2030:  
March

## Climate action continued

### Environmental management

Our Environmental Management System is based on the International Standard EN ISO 14001:2015 requirement. By working to this standard, it ensures that we manage our environmental impact efficiently and thoroughly comply with relevant environmental legislation and regulations, and minimise our environmental impact wherever possible.

The EMS demonstrates strong leadership in managing our environmental impact and a sustained commitment to continual improvement.

Whilst certification is for our offices within the UK (excluding Belfast, which will follow in March 2024), we expect all our colleagues to follow our environmental policies and procedures.

We are a member of the Legal Sustainability Alliance. The LSA is a collaborative network of law firms leading the way in the transition to Net Zero.



### IT equipment

We use a company called Restore Technology to collect redundant IT equipment from any of our locations worldwide to provide us with two important services:

Safe transport and destruction of data with certificated evidence so we can prove to auditors and bodies such as the ISO we have not mishandled data.

Our 2021/22 data:

Asset type	Recycled	Sold	Grand total
Desktop		389	389
Hard drives	156		156
Laptop		432	432
Misc		31	31
Mobile		822	822
Monitor		623	623
Network		49	49
Printer		5	5
Server		9	9
Storage		2	2
Tapes		3	3
Telecomms		27	27
<b>Grand total</b>	<b>156</b>	<b>2,392</b>	<b>2,548</b>

Once Restore Technology have performed this, they take the approach of: a) Can the device be reused and put back into circulation to those that need them; b) If not, what elements can be recycled to reduce the environmental impact.

Since 2018 we have sent them 7,255 assets. 1,445 of those were recycled and 5,722 were of use to others including charities and NGOs.

### ISO 14001:2015 targets

#### Waste management

- Re-use and Recycle – follow the waste hierarchy at all times.
- Recycle, on average, 90% of the waste produced.
- Reduce reliance on single-use disposables.

What?	How?
Reuse furniture wherever possible, but, if not, recycle all suitable office furniture and equipment (i.e. chairs, desks)	Due to the pandemic, rather than provide new chairs for people to work at home, we utilise the chairs from the office
Recycle paper	All paper is placed in the confidential bins so it can be recycled properly
Recycle plastic	Prior to COVID-19, we replaced plastic cutlery with metal and ensured all our containers were recyclable

### Building management strategy to reduce energy consumption

One of the most significant environmental impacts is reliance on energy for the buildings we occupy.

We do not own any of the buildings we occupy, but are continuing to encourage the procurement of Renewable Green Energy across 100% of our sites, as well as exploring the feasibility of introducing water conservation methods.

This will extend to any future property expansion, whether that be an office move or office space acquired during M&A activity to assist with our

Scope 1 and 2 targets. Future office space will also take into consideration the EPC as well as BREEAM rating.

61%

of buildings using renewable energy

### Business travel

Reducing our business travel is a key focus for DWF, using technology in the first instance, as opposed to travelling.

We will reduce business travel by 50% by 2030 (against a 2019 baseline).

Where travel is necessary, it must be taken in the most sustainable way.

### Embedding environmental standards across our supply chain

We are working with our supply chain to develop ways to reduce environmental impact. Reviewing the environmental credentials of suppliers as part of the on-boarding process and then throughout the term of the contract, we undertake audits and review the provisions in place, such as minimising delivery packaging and optimising recovery, and ensuring where possible that products purchased have a recognised certification (e.g. MSC and FSC certified).

### Risk management

Our approach is aimed at minimising the health and safety risks of our business activities and for the welfare of our people, and to also minimise any associated costs in not negating such risks and reputational risks to DWF.

Key risks have been identified as:

- disaffected colleagues/other relationships;
- legal sanctions;
- cost of remediation; and
- reputational damage.

## Climate action continued

The policies and procedures in place allow DWF to:

- ensure that our colleagues have an awareness of health and safety issues and receive training wherever necessary; and
- ensure that our key suppliers and contractors, wherever possible, operate to similar standards.

Training includes appropriate training for those with specific health and safety responsibilities and targeted awareness raising programmes, which address the priorities identified in the training needs analysis document.

There is an internal audit programme in place whereby integrated audits across Health, Safety and Environment are undertaken. Continually monitoring the effectiveness of our management systems and associated policies and procedures will assist in reducing, if not eliminating, any risks.

### Communication

We are committed to ensuring that colleagues have a reasonable awareness of health and safety issues and that we publish information on health and safety regularly through the various channels available, e.g. internal intranet, email, internal publications etc.

### Internal communications

Health and safety information and updates are available on DWF's internal intranet system to ensure that all colleagues have access to relevant information. Specialist information and briefings are distributed internally as appropriate. DWF provides on-site contractors and other suppliers with relevant information relating to their role in fulfilling DWF health and safety policies, objectives and procedures.

### External communications

A process has been put in place for receiving, documenting and responding to relevant communications from external interested parties.



### Engaging our colleagues

The Carbon Literacy Trust has declared DWF a Bronze Carbon Literate Organisation.

Carbon Literacy is “an awareness of the carbon dioxide costs and impacts of everyday activities, and the ability to reduce emissions, on an individual, community and organisational basis”, and a Carbon Literate Organisation (‘CLO’), therefore, is an organisation that is making a substantial commitment to Carbon Literacy.

DWF is only the second legal organisation to receive the award.



Training began in June 2021 and we had 16 people trained by September 2021. Silver accreditation requires 15% of the workforce to be certified as carbon literate, which will involve training nearly 400 colleagues and meeting several other requirements.

We are currently running courses with a further 24 people being trained during June 2022 and further training planned for September 2022.

Since we introduced the Carbon Literacy Project into our business, 25 colleagues have been certified as carbon literate. In 2022/23, we expect to train a further 60 colleagues.

### Health and safety: metrics

DWF has never been prosecuted or served Notices by the HSE or any other governing body.

COVID-19 policies were put in place following government and local health authority guidance and expectations. We continue to monitor the situation and will reinstate any policies or procedures as and when necessary.

There have been no RIDDOR incidents reported in the last three years.

There were no accidents reported for 2021 and only 10 reported during 2020 (likely due to the majority of our people working at home because of COVID-19).

### GHG emissions trend data

Year	CY year total TCO <sub>2</sub>	Change from previous year TCO <sub>2</sub>	% reduction
2019	18,673.835	-	-
2020	10,987.549	-7,686.286	41.16% decrease from CY2019 to CY2020
2021	8,096.693	-2,890.856	26.31% decrease from CY2020 to CY2021
2019-2021	-	56.64% decrease from CY2019 to CY2021	-

For more information on GHG emissions, please see page 43 of our Annual Report and Accounts (ARA)

# Diversity & Inclusion

## Our approach

Our vision is to create a working environment and culture where colleagues of all different backgrounds are able to contribute at their highest level to deliver positive outcomes with our colleagues, clients and communities. This means sustaining a workplace where everyone is included, valued and equipped with skills for today and the future.

As a global business, we operate in many countries with differing laws and are sensitive to these and to cultural and social differences. However, our values are universal and we have a zero tolerance approach to discrimination, harassment and intimidation.

Consistent with our commitment to responsible business, we are a signatory of the UN Global Compact and support the Universal Declaration of Human Rights, respecting ILO (International Labour Organization) labour standards, UK Prompt Payment Code and UK Living Wage.

In May 2021, we launched our five-year global D&I Strategy to work towards gender balance across all levels of management, embed ambitious new targets on both gender and ethnic diversity, and expand the scope of our pay gap reporting.

Supported by Executive Sponsors on Gender, Race, LGBT+, Disability and Mental Health (Age, Flexible/ Agile Working and Social Mobility are woven throughout these strands), we are leveraging the focus on ESG reporting to help embed the D&I Strategy across five priority areas:

1. Ownership – Enabling and empowering our people to own our D&I agenda, not just engage or take part.
2. Representation – Ensuring our actions are data driven so we can build diverse representation at all levels of our business through the development of targets and metrics.
3. Global direction – As a global business, we recognise the importance of understanding local priorities and collaboration without borders is vital to achieving full inclusion.
4. Driving decisions – Increasing accountability and transparency of this strategy means moving from executive engagement to executive ownership and ensuring every decision our business takes has a D&I lens.
5. Sense of belonging – Representation is meaningless unless our colleagues feel they belong and are empowered to do their best.

### Why it matters

When our colleagues feel included and that they belong, they want to stay and grow with us. We believe this sense of belonging is essential to our future and in line with our purpose, creating a positive outcome for everyone. Our approach will ensure inclusivity remains central to the experience of colleagues and that together we can embed a people-first, one-team approach to the way we do business.

## Our commitments

- UN Women Empowerment Principles
- BITC's Race at Work Charter
- Mindful Business Charter
- UN Global LGBTI Standards
- UK Social Mobility Pledge
- Disability Confident



## Our targets

Over the last three years, our D&I targets have demonstrated to stakeholders that we are serious about increasing gender and ethnicity representation, particularly at senior levels.

Our new targets signal our intent to do better:

- Increase the proportion of women on the PLC and Executive Boards to 40% by 2025
- Increase the proportion of senior management roles held by women globally to at least 40% by 2025
- In the UK, increase the representation of Black, Asian and Minority Ethnic colleagues across senior management to 10% by 2025
- In the UK, increase the representation of Black, Asian and Minority Ethnic colleagues across all career bands to 13%
- Increase Black representation overall and in senior roles to at least 3% by 2025
- The Board to initiate global gender pay gap reporting by 2022 (in addition to ethnicity, publish UK pay data by disability, LGBT+ by 2023)

## D&I Accreditations 2021/22



Times Top 50 Employer for Women



Global Stonewall Diversity Champion



Top 30 Employer for Working Families



Top 75 Employer in the Social Mobility Index



Disability Confident Leader

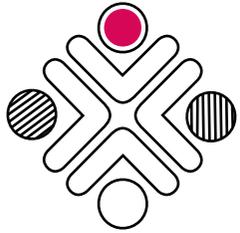


Gold Standard in the Employer Network for Equality & Inclusion's TIDE (Talent Inclusion & Diversity Evaluation) benchmark



UK Living Wage Employer since 2014

## Diversity & Inclusion continued



**“Leadership, values, culture and dialogue all have an impact on Diversity & Inclusion – so we’re ensuring each divisional CEO is responsible and accountable for progressing a D&I action plan. Plus, we’re working on more extensive talent mapping and divisional plans to support our key initiatives.”**

**Sir Nigel Knowles**

Group Chief Executive Officer

### Our Affinity Networks

Exec sponsors

#### Affinity Networks promoting inclusion

Our Affinity Networks are a pivotal part of our Diversity & Inclusion strategy. They provide a safe and supportive space for colleagues to share their experiences and generate ideas to help create a more inclusive business. They also engage and collaborate with our clients on this shared agenda.



Age, Agile Working and Social Mobility are woven throughout these strands

### Progress against our D&I plans

All our hiring managers are required to undertake ‘Inclusive Hiring Training’. The purpose of the session is to ensure they:

- feel more confident about interviewing in a fair and inclusive manner;
- identify where they are making stereotypical assumptions about people and where bias may creep into the process;
- apply scoring objectively;
- prepare questions that test the criteria in the role description and person specification;
- avoid questions that are not relevant to the requirements of the role;
- contribute to protecting our colleague brand; and
- ensure a fair candidate experience.

We piloted Inclusive Leadership Training in 2021 and will roll out more widely in 2022. The purpose of the session is to ensure managers:

- gain knowledge of an inclusive leadership approach;
- strengthen their competencies at defining inclusive and exclusive patterns of behaviour;
- understand what inclusive leadership looks and feels like; and
- understand where there may be gaps – where we are not being inclusive leaders – or what to look for that indicates a leader is not being inclusive.

### Global D&I campaigns:

#### 8 March 2022

**International Women’s Day** This is a day that welcomes everyone to celebrate and take action, both women and allies. As part of our 2022 celebrations, DWF collaborated with Enterprise Rent-A-Car on an event to explore imposter syndrome, where it comes from, how we can spot it and how we can prevent it.

#### 13–17 September 2021

**DWF Diversity Week** provides an opportunity to reflect on our achievements, showcase our inclusion initiatives and take the time to gain new perspectives on our lives and others around us. Our showcase event introduced colleagues to Stephanie Boyce, President of the Law Society. Stephanie is its 177th president, the sixth woman to hold this office and the first woman of colour to become president. Stephanie shared her ambitions for the profession, advancing social mobility and her plans and presidential commitment to make the profession more diverse and more inclusive than the one she entered.

#### 19 November 2021

**International Men’s Day** encourages our male colleagues to become champions and sponsors for gender equality. It provides an opportunity to address issues facing men including working flexibly, men’s mental health, and boys in education. As part of our International Men’s Day programme of activity, we explored men’s mental health to understand the root causes and learn how we can collectively tackle this problem. Our roundtable discussion on Men’s Mental Health included a diverse collection of speakers providing their insight and advice on how we can raise awareness of the causes, signs and symptoms to better support those struggling with mental health issues.

**Affinity Networks** provide the opportunity for our colleagues to build an inclusive workplace, connect with like-minded colleagues and create a space where they feel safe voicing their experiences.

## Diversity & Inclusion continued



### Attracting Talent

- Collaborating with non-selective state schools and non-Russell Group universities across the UK.
- Clear Talents online tool to record a person's reasonable adjustments.
- Utilise Rare Contextual Recruitment in our Emerging Talent process.
- Removed minimum A-Level requirement, blind CVs used for mid to senior career band roles, and blind screening for training contracts and vacation schemes.
- Offering alternative routes to qualification through Legal Apprenticeships and our Paralegal Trailblazer Apprenticeships and Ethnic Minority Access Programmes.



### Developing Talent

- Women's peer-to-peer mentoring in collaboration with our clients, race reverse and two-way mentoring with senior leaders including PLC, Exec Board members and external mentoring for members of underrepresented groups.
- Tailored training for underrepresented colleagues allows us to support in-work progression to facilitate moves to higher-paid work by developing new skills.
- Providing webinars for all colleagues on confidence building and career development.
- Mandatory D&I training for all colleagues and Inclusive Leadership Training for all leaders within our business.



### Retaining Talent

- Roundtables held with men and women at all career levels and additional sessions for Black, Asian and Minority Ethnic trainees and senior leaders to discuss progression and best practice.
- Continual inclusive policy development including family friendly, D&I and gender transition policies.
- Annual bonus plan to ensure a consistent and inclusive approach is applied to how our colleagues are rewarded.
- Programme of content, events and support on gender balance, anti-racism, culture, LGBT+, disability, neurodiversity, faith, menopause, and mental health.



### Progressing Talent

- Review of diversity composition and succession planning of client teams championed by our CEO.
- Race and Ethnicity Network held promotions discussion to highlight role models, provide information on the process and encourage other network members to apply.
- All hiring managers must undertake 'Inclusive Hiring Training' to avoid making stereotypical judgements, be aware of unconscious bias, score objectively and ensure a fair candidate experience.
- 75% of promotion applications in the 2021/22 cycle were taken to the assessment stage, all of which were successful.

## Diversity & Inclusion continued

### Some examples of D&I Leadership in action



**Seema Bains**

Seema is a Partner Director on DWF's PLC Board and is Head of our D&I Leadership Group. In 2021, Seema was named in the HERoes Women Executives Role Model List 2021 for the second year in a row. Seema has grown our D&I Leadership Group into a global group with over 80 members across all DWF's offices. She has pioneered D&I best practices, such as the implementation of blind CVs for senior management roles and inclusive hiring training, to increase the recruitment of underrepresented groups. For her intersectional approach to advancing women's careers, Seema led a series of gender equality roundtables recognised in Leading The Way: The Times Top 50 Employers For Women 2021. Seema has also spoken at the UN's conference 'Target Gender Equality, Target Ethnic Diversity'.



**Caroline Colliston**

Caroline is a partner based in our Edinburgh office and in 2021 was appointed as the Executive Partner for Scotland.

She is also DWF's gender co-lead, an active member of DWF's Diversity & Inclusion Leadership Group and a strong advocate for Diversity & Inclusion and social mobility in the law. A visible advocate of the fair work agenda within the Scottish business community, Caroline sits on the advisory board of Business in the Community Scotland, is the Scottish Government's appointed chair of the Business Leadership Group of the Scottish Business Pledge and sits on the Women in Tax Scotland committee as well as tax committees for the Law Society of Scotland.



**Paul Maddock**

Paul is a Senior Associate at DWF, founding member of DWF's LGBT+ affinity network, Out Front, and vice chair of the Law Society of England and Wales LGBT+ Division Committee, which aims to help improve the experience of LGBT+ individuals within the legal profession.

Paul contributed as a speaker in support of the UN Global Compact Network UK's Pride Plus: Building LGBTIQ+ Inclusive Business webinar series to inspire businesses to start and maintain conversations about LGBTIQ+ participation in the workplace.



**Jewels Chamberlain**

Jewels is a partner based in our Liverpool office, a member of our D&I Leadership Group and the lead for our menopause group. Influenced by her experiences growing up in the apartheid era in South Africa, Jewels is a passionate advocate for inclusion, advancing social mobility, fighting injustice and helping our communities as a Trustee of the DWF Foundation. She also sits on the UCLAN School of Justice Employer Board. In January 2022, Jewels chaired a client collaboration event on Men's Mental Health.



**Kishan Mangat**

Kishan is a specialist litigator at DWF and recognised in Insurance Business UK's Elite Women in 2021 and 2022. As a passionate commentator on the importance of ethnic diversity, Kishan is a founding member and co-chair of the Insurance Cultural Awareness Network ('iCAN'), a network that promotes and supports the inclusion of ethnic minority talent across the industry. She is also a member of the Worshipful Company of Insurers and sits on the Insurance Women's Inclusivity Network ('iWIN') committee, which focuses on enhancing the role of women in the industry.



**Catherine Haslam**

Catherine is a partner based in our Manchester office and a member of our D&I Leadership Group, who co-leads our work on gender and spearheads the Diversity & Inclusion Action Plan across Real Estate. A strong advocate for talent management and career mapping, Catherine is also a visible supporter of the UN's Target Gender Equality Accelerator Programme. As an inspirational role model, Catherine also participates in our flagship education programme in the UK, 5 STAR Futures, designed to advance social mobility. Its focus on workplace behaviours, confidence and resilience supports a shared ambition across DWF to stop social background predicting a young person's success.



**Lex Orange**

Lex is a Principal Lawyer based in our Brisbane office and a key member of the DWF D&I Committee in Australia as well as being a member of the Global Race and Ethnicity Steering Group. The Committee ensures that DWF colleagues in Australia are aware of, involved with and can contribute to DWF D&I initiatives. Lex, together with our D&I champions in Australia, organises and contributes to a number of local and global events including International Women's Day, Reconciliation Day, Mardi Gras and Mental Health awareness. Lex is a supporter of greater gender balance and social mobility in the legal sector. He is particularly passionate about improving communication and approaches to mental health in the workplace as well as supporting first nation people into a career in law. Lex has also supported global developments in D&I initiatives tailored to assist with challenges faced in the legal profession, such as the monitoring of work allocation as a way to monitor gender inclusion.



**Mohab Khattab**

Mohab is CEO of DWF Arabia and has supported the work of the DWF Affinity network on gender. As part of our International Women's Day celebrations, Mohab hosted a virtual event for global colleagues from our D&I Leadership and Gender Leadership groups. It centred around female-led fashion in Arabia and encouraged participants to explore how we can empower women, build awareness and cultural sensitivity, and #BreakTheBias on a global scale.

## Diversity & Inclusion continued

### D&I mentoring

In 2021, the DWF PLC and Executive Boards partnered with the DWF Race & Ethnicity Affinity Network on two mentoring programmes. A two-way mentoring programme was created with the PLC Board members and a reverse mentoring programme created with the Executive Board members.

This provided opportunities for colleagues from Black, Asian and Minority Ethnic backgrounds and senior leaders to share their experiences and learn from one another in a confidential, nurturing environment.

Following the successful launch of these programmes, a number of race reverse mentoring programmes were developed across our office locations, creating a total of 55 pairings.

In addition to this, reverse mentoring programmes were created within our divisional areas focused on race and other diversity characteristics.

Following the six-month two-way mentoring programme, we surveyed our PLC Board pairings. Common discussion themes included race and ethnicity in the workplace, leadership techniques and sharing perspectives from different career levels. Outcomes included the PLC Board members taking ideas from their mentor partner back to the PLC Board for further discussion and ongoing relationships between the pairs.

100% of the respondents said that the programme had helped them develop skills to advance their career ambitions and one PLC Board member added, "It has been powerful, satisfying and rewarding."

### Menopause support

DWF has a dedicated menopause group and support hub. In 2022, Menopause Coffee & Chat sessions have taken place every two months to provide a safe discussion space for people to share experiences and advice, and ask questions. Based on feedback and content provided by the members of the menopause group, a review of the intranet space dedicated to menopause support was undertaken in Q1 2022. As a result, this now provides on-demand access to all DWF colleagues on the following:

- Access to the menopause group distribution list and local groups
- Details of our menopause Coffee & Chat sessions
- Past menopause webinar recordings
- External resources shared by colleagues and our health and wellbeing partners
- Workplace adjustment information
- Internal blogs
- Internal policy information
- Intersectional information on the menopause

To mark International Day of Action for Women's Health, we also held a 'Menopause Awareness Webinar 2022'. DWF colleagues submitted their questions in advance and the session was tailored to provide answers and the latest information on menopause.

### Our Diversity & Inclusion performance

	Representation as at 30 April 2022	Target
<b>Gender (female representation as at March 2022)</b>		
PLC Board	30%	40%
Executive Board	36%	40%
Senior management	29%	40%
All colleagues	58%	
<b>Ethnicity</b>		
PLC Board members from a minority ethnic background	10%	
Executive Board	0%	
Senior management	4%	10%
All colleagues	12%	13%
Black representation overall and in senior roles	1%	3%
<b>Disability</b>		
% of colleagues who disclose that they have a disability	4%	
<b>Sexual orientation and gender identity</b>		
% of colleagues who disclose that they are lesbian, gay, bisexual or trans	4%	

# Empowering colleagues and our communities

## Our approach

As a future-focused business, we continue to embrace flexible and agile ways of hybrid working, helping to sustain a high-performing, inclusive workplace.

Our colleagues bring our purpose to life and we remain committed to recruiting and developing top talent, investing in their development and wellbeing, advancing social mobility and increasing engagement through values-led behaviour to achieve higher levels of job satisfaction. We listen to understand how we can do better and will work harder to foster a culture of recognition and appreciation throughout DWF.

Our colleagues continue to be the driving force behind our community engagement efforts. To support their work, we will empower more colleagues to use their talent, skills and insight to strengthen our communities through volunteering and global pro bono support.

We define 'local' by those areas where we have considerable operations.



### Why it matters

Businesses are crucial to a fair and inclusive recovery from the pandemic and, with the future in mind, talent remains our most important asset. The need to help our colleagues and communities prepare and adapt to the future of work and transition to remote and hybrid work models has only been accelerated by the COVID-19 pandemic.

Our business and societal responsibility is to ensure current and future workforces have the skills they need to gain and sustain employment. By nurturing a culture aligned to our purpose, values and ambition as a force for good in society, we will strengthen engagement from everyone who works at DWF. When they feel like they belong, colleagues are empowered to share their passion and skills to have a positive impact on DWF and the world we all inhabit.

Our day-to-day experiences are what determine whether we are invested in the success of DWF as a responsible, sustainable business – ultimately, whether we choose to stay and engage, perform and progress, or leave.

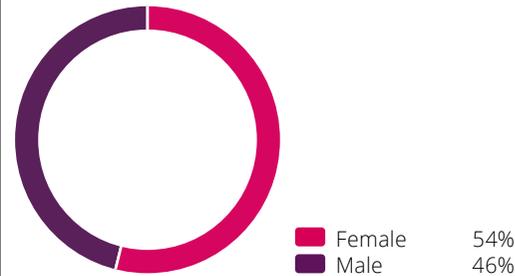
## Highlights

**76**  
Colleague Engagement Score

**1,500**  
colleague recognitions monthly

**20,694**  
hours of training

**224**  
colleagues promoted in 2021



**17%**  
of colleagues globally (19% UK) have worked for DWF for 10 years or more



### DWF Life

Our business thrives on empowering each other to share experiences, ideas and where our colleagues feel valued, recognised and can be themselves.

In 2021, we launched our employee value proposition ('EVP') to position DWF as an employer of choice in a competitive labour market, and to make our brand accessible to new talent.

DWF Life brings together all of the essential elements of what it means to be a part of DWF, ensuring that together all of our colleagues continue to make DWF a great place to work.

Building our one-team culture underpinned by our global values and behaviours is essential if we want to provide a rewarding and fulfilling working environment, with routes to develop and the freedom to grow.

## Empowering colleagues and our communities continued

### Colleague health and wellbeing

In delivering on our purpose, our wellbeing strategy aims to create and sustain a healthy working environment where everyone at DWF feels supported and comfortable to speak openly about their wellbeing.

Our Wellbeing Leadership Group continues to oversee our four pillars of activity:



### Wellbeing guidance

Our Wellbeing Hub provides colleagues with access to a range of interactive guides, information and support. Our learning resource platform offers five channels of tailored content such as videos, books and audio books on Mindfulness at Work, Stress Management, and Physical, Mental and Financial Wellbeing. The DWF Academy provides access to over 20 wellbeing modules including Healthy Living, Positive Thinking, Life Balance, Resilience and Relaxation.

### Wellbeing Wednesdays

We publish regular wellbeing content and updates on our intranet and in our Weekly Digest. This includes reminders on the wellbeing resources already available as well as promoting upcoming webinars and examples of what our colleagues have been doing in this space through blogs and other colleague-led activity.

### Wellbeing Sub Steering Group

To help embed our wellbeing strategy and support the aims of our global Wellbeing Leadership Group, we formed a Sub Steering Group to engage with colleagues and ensure they have a voice when it comes to informing and contributing to our wellbeing agenda.

### Recognising wellbeing

Achievers is our day-to-day recognition platform. In 2021, we adapted the platform to allow recognitions for individuals who have contributed to our wellbeing agenda. The Wellbeing Leadership Group allocates a monthly budget to award points. Managers can boost the points of any colleague recognised.

Colleague Feedback on Wellbeing (September 2021):

- 76% of colleagues feel they have the support they need to focus on their personal wellbeing
- 84% feel supported to work remotely
- 75% feel able to balance work and personal life in a way that works for them



**“It’s important to recognise that mental health is something we all have and at any point in time we all function on a scale between thriving and surviving. For some of us, social isolation, back to back meetings and increasingly blurred lines between work and home-life, can mean our ability to take a break and re-charge mentally and physically has become more challenging.”**

**“Our aim is that leaders, line managers and colleagues become increasingly confident in the way we talk about, help break down the stigma around, and show support to those with mental ill health. That’s why we are focused on embedding the Mindful Business Charter across DWF, highlighting the importance of good mental health for a happy work, family and social life.”**

**Jason Ford and Darren Drabble,**  
DWF Executive Sponsors on Mental Health

**“Our focus and central to our purpose is ensuring we make DWF a great place to work. We’ve increased our focus on health and wellness internally with expanded wellbeing benefits and a sustained focus on mental health and financial planning resources.”**

**Helen Hill**  
Chief People Officer

## Empowering colleagues and our communities continued



### Mindful Business Charter

We signed up to the Mindful Business Charter in 2019 as a commitment to reducing stress in the workplace. The Charter sets out four principles:

- **Openness and respect**  
– building trust and effective communication
- **Smart meetings and emails**  
– adhering to smart meeting and email guidance
- **Respecting rest periods**  
– consideration given to the need to ‘switch off’
- **Mindful delegation**  
– implementing a best practice approach to collaboration, instruction and delegation

We have since launched a guide to embedding the Charter to help empower colleagues to voice their ‘non-negotiables’ and help achieve their work-life balance. It also provided useful hints and tips that we should all consider, to be respectful and mindful of each other during meetings, not to over-use emails or copy colleagues in unnecessarily, using Teams responsibly, considering the impact on time management by setting unrealistic deadlines and respecting rest periods including annual leave.

### Mental Health First Aiders

In 2021, we formalised the role of the Mental Health First Aider to help spot the signs and symptoms of common mental health issues, provide preliminary support and reassurance, and guide an individual to seek the professional assistance they may require. Our Mental Health First Aiders complete a two-day course – Adult Mental Health First Aid – which teaches them practical skills to spot the signs of mental illness and give them the confidence to step in and support a colleague who needs help.

### Employee Assistance Programme (‘EAP’)

Workplace Options, our EAP, is one of our core benefits and is automatically available to everyone from the day that they start work at DWF. It is a completely confidential helpline and is there to support through difficult times, which may be impacting on a person’s mental health. It’s available 24 hours a day, seven days a week.

Based on the assessment of needs, a counsellor provides access to the following benefits as appropriate:

- Telephone-based counselling sessions
- Face-to-face counselling sessions
- Online self-help programmes
- Referral for a mental health consultation which could result in more specific medical treatment

### Family friendly policies

Our UK family friendly policies describe the collection of arrangements we have in place to support colleagues during life-changing moments they may have while working at DWF.

We know that it is important for colleagues to feel supported during major events in their life, a time when events in personal lives naturally take a priority over work.

Responding to colleague feedback and in keeping with our purpose and the principles of DWF Life, we are making significant improvements to our family friendly policies.

From May 1, our UK colleagues benefited from an increase in Maternity Pay and Adoption Leave to full salary for 26 weeks. Paternity Leave increased from two to four weeks at full pay and Shared Parental Leave from full salary for the first two weeks to eight weeks of full salary.

### Health and safety

Every business has health and safety responsibilities and DWF is no exception. Managing the welfare of our colleagues is key to our business. Businesses are under increasing scrutiny to demonstrate responsibility and commitment to health and safety management.

Overall responsibility for health and safety management is shared between DWF and its colleagues. The system is designed to ensure that our colleagues are aware of both their own and DWF’s responsibilities under health and safety legislation.

Good health and safety management ensures we remain compliant but can also add value to our business. For example, it ensures a safe working environment and demonstrates that DWF takes its health and safety responsibilities very seriously. For this reason, a sound management system can form a core part of our employment proposition and a driver of colleague advocacy. The management system also provides a platform for us to improve and evolve our policies and procedures and gain a better understanding of our risks and opportunities to improve.

The policies and procedures in place also enable DWF to improve resilience by anticipating, adapting to and responding to health and safety risks, which in turn will provide opportunities to help prevent work-related injuries and ill health.

Standards and legislation frequently change and we therefore continue to monitor developments in the legal sector, and to review our practices on a regular basis.



## Empowering colleagues and our communities continued

### Colleague engagement

We carry out a biannual global Pulse Survey as a key measure of engagement, to find out directly from our colleagues how they feel about working at DWF.

The questions have been determined based on research identifying the engagement drivers that most substantially contribute to colleague and business outcomes. In September 2021, scores improved on eight questions, remained the same on nine and dipped slightly on just two, since our last survey in December 2020. Given the challenging working environment created by the pandemic, we are pleased to see levels of engagement have remained relatively stable. In May 2022, our latest results show improved scores across 16 out of the 20 questions asked, with no dip in scores since the previous Pulse Survey in September 2021.

- I would recommend this as a great place to work
- I rarely think about looking for a job elsewhere
- I am enthusiastic about my job

Accessing the results and commentary via a digital platform helps leaders and line managers to track and remain focused on the improvements that matter the most for our colleagues.

### Trend data

Pulse Survey	Response rate %/No of colleagues	Engagement index
November 2019	60% (2,090)	75
June 2020	67% (2,208)	76
December 2020	63% (2,220)	75
September 2021	65% (2,602)	76
May 2022	73% (2,967)	76

### Benefits and pensions

An important element of DWF Life is the rewards and benefits that we offer our colleagues in return for their performance within the workplace. Through our flexible reward and benefits platform, Reward Plus, we provide a number of core company-funded benefits, whilst providing colleagues and their families with a range of benefits designed to meet the needs of our diverse workforce and help to protect and enhance the wellbeing, work and personal life balance, and financial security of our colleagues and their families.

In 2021, Aegon amended its default fund and we transferred all of our colleagues who had not selected a specialist fund to this new fund. This fund seeks to maximise exposure to positive ESG factors such as reducing carbon emissions and carbon reserves intensity. Key Workplace ARC default funds, including the in-house Aegon Workplace Default fund, have around a 30% allocation for growth stage investors to the HSBC Developed World Sustainable Equity Index fund.

This fund targets a 20% increase in ESG ratings and a 50% reduction in carbon emissions intensity. It also aims at a 50% reduction in fossil fuels reserves intensity.

Since the pandemic, we have significantly increased our focus on wellbeing resources and guidance, and in March 2022, launched an app-based health and wellbeing benefit – Gympass – for UK colleagues.

Colleagues can select a membership level of their choice to receive access to a range of gyms, studios and fitness venues, health and wellbeing apps, one-to-one online personal training and much more.

# 1,181

colleagues registered on our colleague discounts site

# 1,277

colleagues used our benefits window to review the range of benefits available

# 378

colleagues took advantage of our holiday buy scheme

# 76%

Our Engagement Index score is a composite metric based on three statements

### Share awards

We continue to empower our colleagues through our comprehensive share ownership scheme. Colleagues are issued awards for Promotions, Exceptional Contributions or Lateral Hires. We have also introduced a new award for Emerging Talent to ensure we retain those key individuals that have received a promotion after achieving a qualification. Over 650 share awards were granted to our colleagues in 2021/22.

### Ways of working

Digital transformation has helped ensure our colleagues have the tools, support, guidance and advocacy to work efficiently, no matter where they are working. Pre-pandemic, we had already introduced mobile document access, mobile printing and a digital mailroom that automatically digitises and delivers all posted documents directly to the recipient's inbox in email form. Designed to help staff work flexibly – whether at home, travelling or working from a hot desk in a different location. The reduced need for paper documents further supports our sustainability goals and has resulted in savings in office space.

In early 2021, we asked colleagues to take part in a survey to help shape our post-COVID future workplace strategy. Focus groups then helped inform our approach when we re-opened our offices towards the end of the summer. The momentum gathered was hindered by the Omicron variant of COVID, just at a time when we were all adapting to our hybrid model of working.

The situation we face now is very different, as daily restrictions have been replaced with guidance on living with COVID, and we want our hybrid working model to do the same. In February 2022, we launched a second survey to consolidate what we have learned already and to gather feedback and thoughts on how we may all work together in the future, embracing the concept that work is an activity we do, rather than a place we go.

## Empowering colleagues and our communities continued



### Our Clear Outlook Campaign

In January 2022, we ran our Clear Outlook Campaign, which was designed to reduce unnecessary email traffic and meetings. The campaign had three objectives:

1. Reduce the noise caused by excessive email traffic and internal meetings
2. Support colleague wellbeing and contribute to embedding the Mindful Business Charter
3. Drive the required behaviours for exceptional performance

Feedback from our Communications Survey highlighted that nearly 50% of colleagues felt they received too much email traffic. During the Outlook Campaign, this fell to less than 20%. As a result, we are continuing to 'turn down the volume' to support our colleagues.

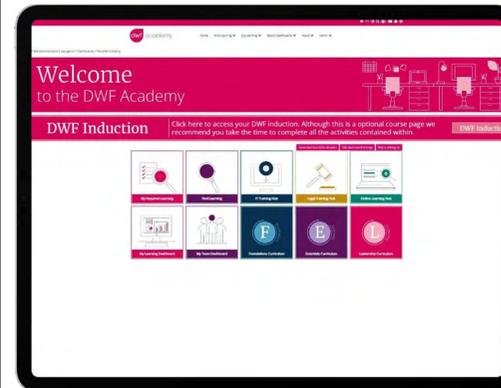


**“One thing the pandemic has taught us is that changes to our work habits are possible – we don’t have to do things the way we’ve always done them. Wherever we can, we want to empower our colleagues to be able to work in ways that best suit their needs without the traditional limitations of where tasks need to be completed whilst creating efficiencies for the business that will increase our ability to invest in our future.”**

**Matt Doughty,**  
COO

### Headline learnings

- The preference for remote working, and requirements to do so effectively, have not changed between surveys
- Colleagues continue to recognise the benefits of remote working, with 64% stating they strongly agree that it is better for work-life balance
- A higher proportion of colleague reported working non-standard hours at home than in the office and the appetite for working in the evening was higher
- Support for DWF adopting an environmentally friendly approach to running its offices remained high in the latest survey



### Learning and development

At DWF, we’re committed to developing and supporting our internal talent, so that everyone has an opportunity to contribute more and grow their career. Our aim is to recognise and nurture the knowledge, skills and behaviours to achieve our global ambitions and we aim to appoint diverse, agile and multi-disciplinary colleagues across every demographic.

Through our DWF Academy, we offer colleagues three programmes of training – Foundations, Essentials and Leadership. Each programme is designed with a target audience in mind to equip colleagues with the skills they need to excel in their current role and prepare them for progression. Colleagues can enrol onto live sessions or complete eLearning as fits with their personal development needs. They have a training record that they can access at any time. Individuals and managers can view a dashboard to check they have fulfilled all of their mandatory training requirements.

To empower our colleagues, we focus on:

- personal effectiveness;
- fair and inclusive recruitment;
- understanding the promotion process;
- skills required to be a high-performing manager;
- how to be better at delivering and sharing feedback;
- handling difficult conversations;
- how to develop a team; and
- inclusive leadership.

# 20,694

training hours completed

## Empowering colleagues and our communities continued

### Performance & career development

All of our colleagues receive an annual performance review.

There are two routes to promotion at DWF:

1. The annual process, which is driven by an individual business case
2. Vacancy driven, dependent on business need and managed through our internal resourcing route

During 2021, the business undertook its annual promotion process, positively impacting 224 colleagues. Of those, 54% of the female population progressed to a higher band, 30% secured a senior appointment and 10% secured a role equivalent to partner.

### Emerging talent

As a leading Social Mobility Employer, we are taking steps to dismantle the barriers to accessing and progressing within the profession.

In the UK, we continue to use contextual assessment of graduate recruitment in a bid to attract a more diverse talent pool and increase social mobility. Specific A-level/Scottish Highers requirements for graduate recruits no longer apply; we simply ask for "good A-Levels/Scottish Highers or equivalent". We are reviewing our law fair attendance and selecting a group of more diverse universities to provide access to a greater number of non-Russell Group students. We also joined the Race Fairness Commitment, an initiative that aims to ensure fairness at work for people of all ethnic backgrounds.

### The value of apprenticeships

Since May 2017, we have used the apprenticeship levy allowance to future-proof our skills pipeline, and attract a diverse range of talent into the business. The programmes we offer range from level 3 Paralegal, through to level 7 Solicitor's master's degree apprenticeships.

Our structured intake of talent provides a debt-free option for people to learn and earn through meaningful work and a genuine career path. Apprenticeships give both our new starters and existing colleagues the opportunity to achieve degree/equivalent level or a professional accreditation that complements their day job.

# 180

apprentices placed since 2016

Our apprentice insight day provided access to law to students in Manchester and Liverpool, focusing on building awareness of apprenticeships amongst those from disadvantaged backgrounds:

- 37 students attended from 22 schools in cold spot areas
- 54% from Black, Asian and Minority Ethnic backgrounds
- 28% in receipt of free school meals
- 54% did not attend university
- 90% said the event was extremely useful in improving their confidence when talking to professionals online

### Ethnic Minority Access Scheme

In April 2021, we provided a one-week paid work placement to 12 aspiring solicitors who were from Black, Asian and Minority Ethnic backgrounds.

This targeted social mobility scheme is designed to give diverse underrepresented candidates from Black, Asian and Minority Ethnic backgrounds the opportunity to gain exposure to commercial law in practice and help progress their legal careers.

Our innovative collaboration with Aspiring Solicitors took place virtually, with involvement from teams across our London, Leeds, Liverpool, Birmingham and Manchester offices. DWF was a founding member of the Aspiring Solicitors Foundation, set up to financially assist talent from lower socio-economic backgrounds, to enter the legal profession.

The candidates gained valuable exposure to live legal work, met our Race and Ethnicity Network and also had an introduction to our race and ethnicity reverse mentoring schemes, which have seen 130 people involved across DWF to date.

**"It is clear that a lot of time and effort was put into bringing this scheme to life and I'm sure my fellow aspiring solicitors will echo what a formative experience it has been for our future careers. Everyone has been so friendly, and it has been very touching to see how much DWF is doing to increase and sustain its pipeline of diverse talent."**

Testimonial from our 2021 intake

### Recognition

We use a digital platform to recognise and celebrate colleagues who live our values and help shape our culture through their performance and the contributions they make to DWF.

# 90%

of colleagues signed in and using our recognition platform

# 1,500

recognitions made monthly

# 2,675

boosts in 2021 – this is when managers award extra points to someone else's recognition

# 17,966

points awarded as at 30 April 2022

# 40%

utilisation of awarded points throughout the year, which equates to a value of £100,290

## Empowering colleagues and our communities continued

### The Rubies

The Rubie Awards is our annual award ceremony that recognises DWF people across the globe who have made a significant contribution during the last year.

The Rubie Awards enable our people to identify, amongst their colleagues, those who have not only inspired but who have gone above and beyond, as we collectively work toward our purpose to deliver positive outcomes with our colleagues, clients and communities.

The award categories ensure that everyone across the business, whether they are at the start of their career or are a longstanding team member, has the opportunity to be recognised. Our values sit at the heart of each award and nominations are made on a global scale.

The award categories are:

- CEO Award
- Employee of the Year – Client Services
- Employee of the Year – Business Services
- Innovation Mindset of the Year
- Rising Star of the Year
- Newcomer of the Year
- Emerging Talent
- Role Model of the Year
- DWF Foundation Award
- Community Impact Award



801  
nominations received

# Empowering colleagues and our communities continued



believe.  
inspire.  
change.

## DWF Foundation

The DWF Foundation is an independent charity, founded by DWF. It has the sole aim of providing funds, resources and mentoring support to help individuals, groups and communities to achieve their full potential.

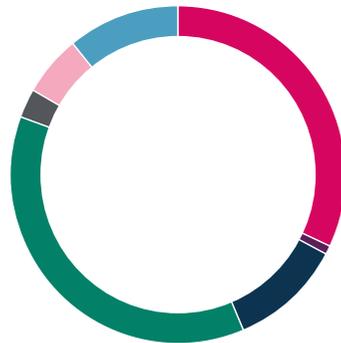
Since the Foundation launched in 2015, the total amount donated is £897,852, awarded through 416 grants.

DWF Foundation Charity No – 1191347

### International emergency response

The DWF Foundation has enabled a quick response to emergency appeals and in 2021/22 donated £17,500 to various causes globally including support to flooding in Germany, storms in Kentucky, US, COVID support in India and the crisis in Afghanistan.

## DWF Foundation giving 2021/22

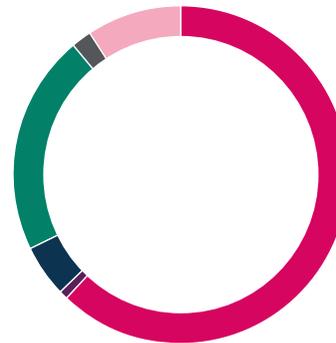


Health and wellbeing	33%
COVID-19/poverty	1%
Education	11%
Emergency response	38%
Employability	3%
Environment and sustainability	6%
Homelessness/poverty	11%

Throughout COVID-19, the DWF Foundation continued its grant giving and listened to our community partners to support those most impacted. To support charities experiencing a drop in revenue, we launched online training sessions to offer guidance on applications to the DWF Foundation and/or other charitable foundations. 17 sessions were delivered in 2021, engaging 400 charities.

Also in response to COVID-19, we listened to our community partners so we could assist those most impacted. To help address the issue of food poverty, the Foundation worked with DWF colleagues (in the UK and internationally) and BITC, to identify local foodbanks in need of support. £38k allocated has supported 72 foodbanks. Three of those foodbanks to date have also applied for funding through our grants application process and have been supported.

## DWF volunteering 2021/22



General	62%
Homeless	1%
Health and wellbeing	5%
Education and employability	21%
Environment	2%
Fundraising	9%

### Volunteering

Despite COVID-19 continuing to restrict activities, colleagues invested 8,287 volunteering hours to support their local communities and 1,850 hours in pro bono support.

We promoted a Coronavirus Checklist to keep colleagues safe when volunteering and turned to online solutions, signing up to Ethical Angel, an online virtual volunteering platform, and adapting our own flagship education programme, 5 STAR Futures, from a school- and office-based model to virtual engagement.

In 2021, 100% of schools participating were non-selective state schools. 53% of young people we work with are eligible for free school meals/pupil premium.

900+

young people participating in our educational outreach

24

schools participating

### 5 STAR Futures

Since 2012, our award winning flagship community education programme has helped aspirational young people to unlock their potential by developing their confidence and employability skills to become more work ready.

The aims of the programme are as follows:

- Increase the numbers of young people from low-income and diverse backgrounds who have improved their confidence. This strong foundation of self-confidence allows young people to develop key employability skills and become more work ready.
- Build a strong and positive link between schools and the world of work. This demystifies the workplace, enabling them raise their aspirations.
- Develop a variety of opportunities for young people to increase their confidence, gain key employability skills and become more work ready.

## Empowering colleagues and our communities continued

Amid the continuing disruption to students due to the pandemic, we transitioned from in-person, location-specific engagement to interactive online sessions. Developing this virtual offering has enabled us to reach into communities we would not have been able to support previously.

In the 2021/22 academic year, we delivered 11 interactive online sessions covering topics such as routes to law, roles in a legal business, Diversity & Inclusion, innovation and working from home.

A further 11 online sessions are planned in 2022 and hybrid work experience sessions will be delivered.

To comply with safeguarding guidelines, students have not been required to provide registration details for these open access events, no cameras are used by attendees and questions are asked via a chatbox. On that basis, we are unable to accurately report on the numbers of students taking part. We are now working with Speakers for Schools to help improve the quality of our data reporting. However, based on feedback and our relationships with some of the schools taking part, we estimate that at least 910 students have been involved. Our colleagues invested 1,782 hours in our education and employability activities during this period.

### Link

Link is designed as an inclusive group open to anyone (internal and external) in the earlier stage of their career who is looking to build their networks with like-minded professionals. Link welcomes anyone in the early stages of their career from *any* industry or sector, and offers access to exclusive panel debates, social events, thought leadership, training and regular insightful communications.

We now have Link representatives in most of our international jurisdictions, as well as across our UK & Ireland offices.

### Law Factor

This is a partnership initiative with John Moore's University in Liverpool, developed to provide the opportunity to young people from disadvantaged backgrounds to learn more about working in the legal sector and encouraging them to consider this as a career path. It focuses on careers in law, the diversity of opportunities available, the skills needed and the different entry routes into the profession. Delivered by DWF with volunteers in different legal roles across the business, we delivered four Law Factor sessions in Liverpool, supporting 17 students from four schools.

### Inspiring Girls

This programme was developed in response to a request from our 5 STAR Futures school in Liverpool. It had identified a need for some focused work with a group of its female students around confidence building, aspirations and resilience. The programme is delivered in four sessions by volunteers from across our business and is a mix of group learning and mentoring sessions with 25 girls identified by the school as in need of some additional support to help prepare them for the world of work.

Some of DWF's offices are within reach of some of the most deprived areas of the UK, with social barriers such as youth unemployment, poor health and low income levels, so it's important to not only remove barriers to widen access to our profession but to build an emerging pipeline of talent.

In line with our purpose and values, and reinforced by our ESG Strategy, we are making a meaningful difference by:

- empowering young people in areas with low social mobility to enter the world of work;
- raising funds to enable the DWF Foundation to provide grants to charities whose work impacts people in locations where we have a presence; and
- donating our time and skills to tackle local social issues.

Our community investment through fundraising and volunteerism is primarily targeted at making a positive impact on the communities we operate in. Colleagues remain the driving force behind our community engagement efforts. To support their work, we are empowering colleagues to use their talent, skills and insight to strengthen our communities through volunteering and global pro bono support.

### Habitat for Humanity

In 2021, colleagues from DWF's Brisbane office volunteered with Habitat for Humanity Australia on its Brush with Kindness corporate volunteering programme. Our volunteers spent the day painting the inside of an old scout hall for use by the Women's Community Aid Association ('WCAA'). The WCAA supports Women's House



Shelta, the Brisbane Rape and Incest Survivors' Support Centre, and Brisbane Southwest Support – Sexual Violence Prevention. These organisations provide services that support women and children with advocacy, accessing legal services, education, medical assistance, refuge, housing, sexual assault counselling and community education. DWF has again committed to supporting Habitat for Humanity's volunteer programme in 2022 to help renovate and make improvements to housing and shelter for families affected by domestic and family violence ('DFV'). The Brisbane Rape and Incest Survivors' Support Centre has previously attended DWF's Brisbane office to hold a roundtable discussion about DFV and we will continue to hold internal presentations for colleagues to raise awareness.

## Empowering colleagues and our communities continued

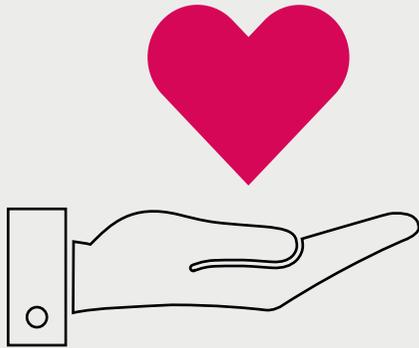
### Fundraising and volunteerism

# £317,725

donated to 116 charities (includes £100,000 for Ukraine humanitarian effort)

# 8,287 hours

volunteered by our colleagues



- Three 5 STAR Futures and two Inspiring Girls in-person sessions in Liverpool, impacting 40 students
- 11 5 STAR Futures online sessions delivered in partnership with Speakers for School
- Five community projects delivered through Ethical Angels – remote volunteering
- 17 community grant sessions delivered, engaging 400 charities
- Four Law Factor Sessions in Liverpool delivered, supporting 17 students from four schools
- Supporting the Social Mobility Foundation, hosted two workplace events engaging 50 students
- With the involvement of PRIME law firms, including DWF, we were able to reach 463 students at 31 schools across 16 different cold spot locations, to engage students about a career in law where opportunities are scarce
- Through the DWF Foundation, we support 21 international grants



DWF is a supporter of PRIME, the legal sector alliance to improve access to the profession through meaningful work experience. Our goal is to embed social mobility within law firms.

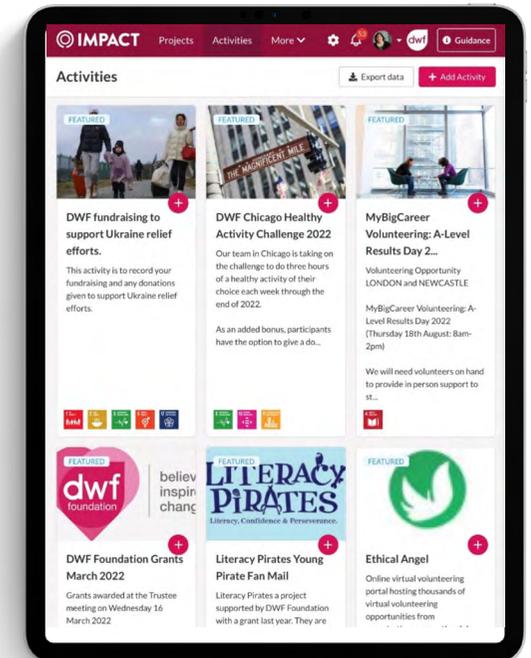
We also support the Social Mobility Foundation and hosted two workplace events engaging 50 students.

We evaluate the impact of our efforts to advance social mobility through our annual participation in the Social Mobility Index. In 2021, we ranked 51st in the Top 75 Employers List.

### CSR impact portal

Our online CSR portal creates a profile of community investment for everyone at DWF and enables us to log activity in real time. This bespoke reporting tool tracks and records the value of our social value efforts. DWF colleagues are encouraged to access information and pledge their support to fundraising and volunteer activity via our CSR online platform. This digital innovation showcases activities across our locations, with photos, real-time data and key performance

indicators. Colleagues can log their impact directly from anywhere, regardless of their location. We use the platform to record the impact of activities that support our community investment themes of education, employability, health and wellbeing, homelessness and environmental sustainability. The accessibility of real-time data allows us to reflect on our social impact and helps to engage and enthuse colleagues to create a more positive social impact in the future.



# Supporting and connecting with our clients

## Our approach

Identifying and managing risk is key to our business. We are working to deliver positive outcomes by embedding responsible and sustainable decision making into everything we do. Doing so helps us deliver long-term shareholder value and protects our colleagues, clients and communities.

### ESG advice

Whilst we have been working with clients for many years on ESG-related issues, we are re-framing the way we market our ESG expertise to enable us to further support our clients and help to future-proof their businesses by clearly outlining areas of specialism across our divisions, practice areas and key sectors.

We have substantial resource and expertise across the UK, Ireland, Germany, France, Italy, Poland, Spain, the Far East, Australia and the Middle East who can advise our clients on ESG-related issues and we have structured our ESG legal advice into four key themes:

- Corporate Governance, Compliance & Risk
- Environment, Climate Change & Energy Transition
- Business & Human Rights
- Community Development & Investment

### Why it matters

As a leading global provider of integrated legal and business services, we play an important role in helping business to grow and prosper.

However, as the only Main Market listed business in our sector, there is increased stakeholder interest in how we do business, where and who we do business with and the level of our ambition and action to integrate and manage ESG risks into our business operations.

We know that our business activities result in both positive and negative impacts on the environment and society, so by integrating ESG thinking into our business strategy, we will increase the positive contributions and minimise the negative effects.



## ESG Client Policy

We work with our clients to help future-proof their businesses by leveraging our ESG expertise.

Our experience, judgement and sector knowledge inform the following risk evaluation criteria when considering who are clients are and what services we provide.

Our ESG Client Policy is currently for all new clients and matters in order to assess whether we should progress with work relating to high-risk sectors or jurisdictions, or in areas that are detrimental to the material issues within our strategy. The policy sets out the process we expect our colleagues to follow to assess the nature of the work and to determine whether it is consistent with our purpose and values.

Any concerns are brought to the attention of our ESG Leadership Group, which is further supported by our Risk & Sanctions Committee.

As part of our ESG client due diligence, we assess:

- the potential for stakeholder concern regarding the client, client matter or sector;
- the probability of such concern generating reputational risk or future impact on income; and
- the potential for risk mitigation measures to be developed and applied.

This ESG risk evaluation will be applied in the future to existing clients to anticipate emerging concerns or as part of the client annual review process.

Currently, the sensitive areas and sectors we have identified as a business are: Gambling, Defence, Animal Welfare, Adult Entertainment, Human Rights and Energy & Natural Resources.

The ESG Leadership Group continually reviews and assesses sectors globally and updates the policy accordingly. This includes taking into account changing economies that may impact our strategy.

## Green credentials

We are continually increasing the level of advice provided to our clients relating to green matters, which includes providing legal advice on renewal energy, decarbonisation projects and environmental law. Our services which have seen the largest impact include Energy & Natural Resources, Financial Services, Real Estate and Consumer sectors.

We are putting procedures in place to record our ESG credentials across the business so that we can accurately disclose the percentage of green matters in future reporting.

We also have representatives from our fee earner community from across sectors and locations who provide regular updates to our Group Head of ESG on developing ESG issues impacting our clients.

Some examples of how we support and connect with our clients are highlighted throughout this report.

### Engaging our clients with thought leadership and insights

To complement the launch of our own ESG Strategy, in December 2021 we commissioned research (<https://dwfgroup.com/en/news-and-insights/reports-and-publications/making-esg-an-integral-part-of-the-business>) to encourage clients to implement better ESG strategies and share ideas on how a better and more sustainable future vision is achieved.

We surveyed 480 senior executives at companies located all around the world and across each of our eight sectors.

The research asked what companies are doing now compared with what they were doing two years ago and what they are planning to do to tackle climate change, embed sustainability and build greater social and economic equity for future generations.

## Supporting and connecting with our clients continued

The findings confirmed that ESG is not an issue for the future, but something requiring immediate attention, with companies explaining how perceptions of a weak ESG performance are resulting in the loss of work and difficulties recruiting talent.

### The stats



# 60%

of companies have lost work due to ESG issues within the business

# 480

companies globally

# 62%

Competing geographical standards and regulation is the biggest challenge for companies – 62%

# 13

Across 13 jurisdictions

# 1/3

say the board level commitment is a challenge, whilst 65% say they have or will link boardroom remuneration to ESG

# 8

sectors

# 60%

Nearly 60% of companies want to be asked by stakeholders about their approach to ESG

# \$250m+

Company turnover

# 42%+

of companies' in-house counsel play a role in driving forward ESG for the business

# Listed

Listed and private companies

# 50%+

of companies are still trying to understand the legal implications for their business

# One in five

companies admit their ESG performance is weak

# ESG

Companies want to work with their professional advisors to support them with ESG issues

In May 2021, DWF hosted a Roundtable for the Circular Economy, to discuss the DEFRA consultation on the introduction of a deposit return scheme ('DRS') for England & Wales. The roundtable highlighted various challenges faced by all businesses in terms of investing in and preparing for the implementation of DRS in Scotland from July 2022 and across the rest of the UK thereafter.

Also in 2021, we published an article on our website discussing two key areas where we are seeing development and risk, including single-use plastics, and responsible advertising and green claims (<https://dwfgroup.com/en/news-and-insights/insights/2021/2/the-circular-economy>). In the drive towards promoting a truly circular economy and tackling single-use plastics, the article referenced and provided a link to the UK Government draft legislation which outlined a plastic packaging tax which will apply to plastic packaging produced in, or imported into, the UK. The article also referenced stakeholder sensitivity to 'green-washing'.

### Responsibility programme

We work in partnership with leadership teams to help foster a positive culture in a changing society and ensure their business is engaged effectively on its brand values and reputation, with a focus on leading ethically and working collaboratively to deliver sustainability goals.

Our highly skilled multi-disciplinary Responsibility team brings together expertise from a range of areas – from carrying out global D&I investigations to highly complex data breach cases, from dealing with Government investigations and directors' duties to implementing energy strategies that exceed obligations and standards.

### Brave New Law

Our interactive programme is for in-house lawyers exploring practical ideas to help with delivering the future of law.

The conception of our Brave New Law programme coincides with an increased global interest in how

businesses approach societal matters such as ESG and D&I, meaning the topics we explore have never been more relevant and necessary for in-house legal teams. Our aim is to bring together members of the legal community from a range of jurisdictions and sectors to fuel diversity of thought, combining in-house and private practice expertise to create solutions, generate ideas and navigate the future changing world.

### Collaborating with clients

#### Supporting our clients through digital transformation

Innovation through digital transformation has become a core part of the business plans for each of our businesses. Managing our business through a global pandemic has shone a spotlight on the art of the possible, using technology and tools to help us work in new and different ways to meet client needs, reduce costs, increase productivity and improve the sustainability of our business.

We have formed partnerships with universities, built a client research network and dedicated R&D budget. Our lab in Pune, India has a special focus on building and testing emerging technology.

In 2021, we created a new corporate innovation function focused completely on innovation activity across DWF and working with strategically important clients – called Innovation & Ventures. Across DWF, impact analysis forms part of the innovation management process implemented in the summer of 2021 for new products and services. As part of an innovation sprint process used to conceptualise new ideas and pitch for investment, the environmental impacts of a new product or service are evaluated alongside the potential economic returns. This is still at an early stage, but takes into account the carbon footprint of the new product or service once operational. The analysis considers business purpose and a commitment to reduce negative impacts.

In 2022/23, the team will develop a series of ESG foundation modules to support ESG learning and training for our clients.

## Supporting and connecting with our clients continued

### Working with our clients



#### Fortune Power

We advised the project sponsors of Fortune Power in respect of the development of a \$5bn liquefied natural gas ('LNG') tank and terminal facility to be constructed in Richard's Bay, South Africa. Our advice focused on the negotiation of the joint development agreement with Excelerate Energy in the US, the development of the floating storage and regasification unit ('FSRU'), and gas supply contracts for the adjacent gas-fired power plant under construction at the site. This is a world-scale LNG tank/terminal facility and is one of the first internationally sponsored LNG projects in Richard's Bay in South Africa.

#### NatWest

We advised NatWest in a c.£100m financing of a series of battery energy storage sites ('BESS') and gas peaking plants across the UK. This is a syndicated asset finance arrangement with a complex power purchase arrangement to support the revenue generation from the sites. We have focused on all aspects of the transaction in connection with the facility agreement to be put in place as well as detailed site-specific due diligence for each of the sites in the UK.



#### Novelis

We advised the UAE and the UK subsidiaries of Novelis, the largest aluminium recycler in the world and a long-term client of DWF across multiple jurisdictions in relation to the issuance and distribution of its EUR 500 million denominated senior green notes due in 2029 by its wholly-owned subsidiary, Novelis Sheet Ingot GmbH. The distribution of the green bonds was carried out in accordance with the Green Bond Principles published by the ICMA. The bonds have been admitted to a listing on the International Stock Exchange's ('TISE') green market segment, TISE GREEN.



#### Costa Coffee

We advised Costa Coffee on the roll out of electric vehicle charging points across its national estate. We have focused on the development of a UK-wide hosting agreement with an electric vehicle charging point operator ('CPO') to include the assessment of relevant sites, addressing issues associated with distribution network operator ('DNO'); and the deployment of charging points over a long-term supply period.



# Acting with integrity in everything we do



## Our approach

We are committed to respecting human rights and upholding the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights in our business and supply chain. For our colleagues, we will introduce additional mandatory risk management training and will contribute more meaningfully to societal efforts to tackle modern slavery.

Our Global Code of Business Conduct and Values in Action Framework sets out clear guidance to help everyone at DWF make the right decisions. Our suppliers must confirm they accept our ethical, labour, human rights and environmental standards aligned to the United Nations Global Compact.

We will take action to ensure zero instances of bribery and corruption, and we are currently a UK accredited Living Wage Employer.

## Why it matters

Our business conduct impacts our reputation and both are inextricably linked to the long-term value we want to create as a global business.

Leading with purpose means living up to our values, ensuring we are able to demonstrate the extent to which those values inform business decisions in a way that is consistent with the expectations of our stakeholders.

We can all effect positive change by staying relevant and connected to the social, ethical and environmental issues that are prevalent in society today. Together, we are responsible for making sure everyone who works for us or with us understands the way we do business.

In practice, this means we:

- sustain a safe, healthy and productive place to work and do business;
- build an agile, inclusive and sustainable workforce;
- compete for business legally, fairly and ethically;
- manage our carbon emissions aligned to a 1.5°C pathway;
- mobilise our collective strength as a force for good in society;
- avoid situations that create real or potential conflicts of interest;
- maintain our zero tolerance approach to bribery or any form of unethical inducement or payment to gain any advantage for DWF;
- support the principles of human rights set out in the Universal Declaration of Human Rights across our global operations;
- not engage in any form of human trafficking or use forced, compulsory, illegal or child labour, or knowingly work with anyone who does;
- work with suppliers who share our ethical standards;

- contribute to the global effort to reduce, reuse and recycle wherever possible;
- encourage everyone to Speak Up if they are unsure about what to do, or concerned that our values, policies or Code are being compromised; and
- continue to review our operating procedures and processes to ensure we do business in an ethical, sustainable and responsible way.

## Our Business Code of Conduct

At DWF, we are driven by a common purpose to deliver positive outcomes with our colleagues, clients and communities. As a global legal business, we must act responsibly – how we do business is just as important as what we do.

The Board understands its role in setting the tone of the DWF Group's culture, ensuring it aligns with our purpose, values and strategy. This year has further highlighted how fundamental the combination of a strong culture and values are in guiding the Group towards achieving its purpose.

Our Code of Business Conduct describes how we put our values into practice. It helps us to do the right thing, to ask the right questions and make the right decisions every day.

The Code reinforces our zero tolerance approach to:

- unsafe, illegal or unethical working practices;
- discrimination, bullying and harassment;
- bribery and corruption; and
- retaliation against anyone who speaks up and does the right thing.

## Acting with integrity in everything we do continued



**“Doing the right thing defines who we are as a business and integrity is essential to everything we do. It’s what our clients expect of us and it’s what we expect of each other.**

**“By following the principles and guidance contained within the Code, we deliver on our purpose and help sustain a work environment that is open, inclusive and fair for all, keeping integrity at the heart of our culture.**

**“We must never allow our culture to be compromised by accepting or excusing behaviour inconsistent with our values, and our Code helps us to sustain that position. Its implementation is not optional and it is expected that everyone across our company upholds these principles and standards because, ultimately, how we behave and conduct ourselves determines whether we are seen as a great place to work and do business.**

**“There will be times when we get it wrong, and when that happens, we must acknowledge it and put things right.”**

**Sir Nigel Knowles**  
Group Chief Executive Officer

[Read our Business Code of Conduct here](#)

### Human rights

In 2022, we published a Human Rights Statement that builds on our previous commitments and reflects the increasing importance of integrating human rights across our business.

[Read our Human Rights Statement here](#)

### Supporting our suppliers

We have more than 2,000 direct suppliers in our supply chain providing recruitment, goods and services to support the operational requirements of a global business.

Our goal is to build trust and open relationships with our supply chain and work together to develop our approach to responsible sourcing and sustainable procurement.

Engagement includes a statement of compliance with our Supplier Code of Conduct and a mandatory Ethical Sourcing Questionnaire response. The questionnaire assists with identifying potential areas of risk within our supply chain, and aligns to our Ethical Sourcing Policy, draws from the International Labour Organization and the Ethical Trading Initiative Base Code, and consolidates input from other stakeholders. It also enables us to track the diversity of our supply chain.

Our expectations of suppliers are grouped into six key areas:

1. Human Rights
2. Health & Safety
3. Responsible Supply Chain Management
4. Diversity & Inclusion
5. Business Integrity
6. Climate Action & Environmental Management

[Read our Supplier Code of Conduct here](#)



DWF’s Ethical Sourcing Policy is based upon the following principles:

- Safe working environments
- Promotion of good health
- Employment being freely chosen
- Appropriate hours, pay and benefits
- Respect for the individual
- The elimination of child labour
- Abolishment of discrimination
- Caring for the environment we live in
- Fairness in decision making

In conducting our business activities, DWF applies these principles and seeks to uphold and promote them as part of the way we do business.

We also collaborate with our peers, supply chain, clients and external organisations to improve our approach to understanding the potential risk of modern slavery in our own supply chains and across the industry. For example, in the UK, we are members of the Greater Manchester Modern Slavery Network.

## Acting with integrity in everything we do continued

### Modern slavery and human trafficking

Read our 2021 Modern Slavery Statement [here](#): This is our sixth annual statement and covers the financial year ended 30 April 2021.

We have reviewed and will continue to review and report on the following indicators to assess the effectiveness of our actions:

- **Zero incidences of modern slavery in our operations** – In the last 12 months, we had no reported incidents of slavery or trafficking in our operations.
- **Zero incidences of modern slavery in our supply chain** – In the last 12 months, we had no reported incidents of slavery or trafficking in our supply chain.
- **Numbers of colleagues trained in relation to modern slavery and trafficking** – 743 colleagues completed Modern Slavery Training in the last financial year.
- **Incidents of modern slavery reported through our Speak Up line** – In the last 12 months, there have been no incidents of modern slavery reported through our Speak Up line.

### Standing with the people of Ukraine

DWF is shocked and appalled by Russia's assault on Ukraine. We condemn the invasion. We stand together in solidarity with the people of Ukraine and hope for a swift and peaceful resolution.

We have no offices in Russia or Ukraine, but we are doing all we can to support any of our colleagues and communities who are affected by this conflict. We are especially proud of our colleagues in Poland who are supporting refugees in the provision of aid, as well as providing pro bono legal advice. In support of the wider humanitarian effort, in conjunction with the DWF Foundation and with the help of colleagues around the world, we aim to raise initial funds of at least £100,000 for Polish charities as part of that effort.

This conflict has caused us to enhance our process for determining who we represent and engage with, including the establishment of a Risk & Sanctions Committee dedicated to this issue. The purpose of this Committee is to ensure a rigorous review of the work that we do or are asked to do, which may have links to Russia, and to ensure that any related business decisions are taken in line with our ESG Strategy and commitment to ethical business. We will also ensure that we comply with all and any applicable sanctions and rules.

For the avoidance of doubt, we do not and will not act for the Russian Government, Russian state-controlled entities or sanctioned entities or individuals.

To support the humanitarian relief efforts, the DWF Foundation distributed £100,000 in grants (which included £50,000 in matched funding from DWF):

£27,000

Disaster and Emergencies Committee ('DEC')

£3,000

DonorUA

£5,000

National Assembly of People with Disabilities

£6,000

OutRight LGBTIQ Ukraine Emergency Fund

£9,000

Polish Humanitarian Action (Polska Akcja Humanitarna)

£4,000

RE:ACT

£5,000

Refugees At Home

£26,000

SOS Children's Villages Association in Poland (Fundacja SOS Wioski Dziecięce)

£11,000

SOS Food Bank (Bank Żywności SOS)

£4,000

The Great Orchestra of Christmas Charity Foundation (Wielka Orkiestra Świątecznej Pomocy)



# Building trust and increasing transparency

## Our approach

We are committed to providing a public account of our progress in delivering on our ESG commitments.

Data moves us forward and, as we continue to hardwire sustainability into our business operations, we are increasing transparency and reporting against our ESG priorities, using internationally recognised reporting frameworks.

In the absence of a consolidated reporting framework, we refer to the Global Reporting Initiative ('GRI') and the Sustainability Accounting Standards Board ('SASB') reporting framework to report on our most material issues, as well as the TCFD.

We recently refreshed the corporate responsibility and Diversity & Inclusion content on our website to increase awareness and transparency of our actions, transformed the sustainability section to more accurately reflect our broader ESG Strategy and commit to regular updates to those webpages. <https://dwfgroup.com/en/esg-and-corporate-sustainability>

The launch of our first ESG Report is an important milestone in increasing reporting transparency.

### Why it matters

Improved transparency and accountability builds trust and confidence among our colleagues, clients, investors and suppliers, and within our communities. Transparent measurement and disclosure of information about our sustainability performance is now a fundamental part of effective business management.

We are also required to support the TCFD in our annual reporting from 2022. Ultimately, trust in business is good for business.



### Leadership in action

We proactively engage and report in line with the following:



### Task Force on Climate-related Financial Disclosures

- Governance
- Strategy
- Risk Management
- Metrics & Targets

For more information, please see pages 38 to 42 of our Annual Report and Accounts (ARA)



## United Nations Global Compact

### UN Early Adopter Programme

As a signatory to the United Nations Global Compact ('UNGC') since 2016, we already report our progress on the Ten Principles related to human rights, labour, environment and anti-corruption, and contribution to the Sustainable Development Goals.

To enhance our Communicating on Progress, we joined the UN's Early Adopter Programme, to track our performance in a more consistent and harmonised way. It also created the opportunity to help test this enhanced digital platform ahead of its implementation for all participating companies in 2023.

In doing so, we have also reinforced the continuing commitment of our Group CEO to operationalise and accelerate our impact on the Ten Principles.



### UN Target Gender Equality

Since joining this trailblazing initiative in 2020, we have continued to participate in Target Gender Equality, to help implement the Women's Empowerment Principles and strengthen our contribution to SDG 5, which aims to achieve gender equality in terms of representation, participation and leadership in business globally.

As part of the Target Gender Equality Alumni, we have participated in Action Dialogue sessions, provided case studies and shared insights and guidance to subsequent cohorts of companies taking part.

A key outcome was the introduction of our latest stretch targets to increase gender representation across senior management, as a signal of our intent to do better and to accelerate progress on gender equality.

### SDG Ambition Accelerator Programme

As a blueprint for a more sustainable and inclusive future, the SDGs represent a compelling growth strategy for business, an opportunity to build resilience, and a chance for companies to lead the way in ending inequality and extreme poverty, and protecting our planet.

We took part in this global accelerator initiative to challenge and support us to set ambitious corporate targets in our core business management. The programme ran from October 2020 to July 2021 and a key outcome was aligning our decarbonisation goals with science-based targets and embedding a set of material sustainability goals delivered by 2030 to accelerate our contribution to the SDGs.

As continuing advocates of this programme, we spoke at the UN Global Compact Network UK, Responsible Business & SDGs Summit in July 2021.

## Building trust and increasing transparency continued

### 2021 gender pay gap

	2017*	2018	2019	2020	2021
<b>Colleagues hourly pay gap</b>					
Mean hourly pay gap	24%	23%	22%	21%	17%
Median hourly pay gap	27%	24%	23%	24%	18%
<b>Self-employed hourly pay gap</b>					
Mean hourly pay gap	13%	16%	15%	13%	11%
Median hourly pay gap	5%	16%	14%	11%	13%
<b>Combined hourly pay gap</b>					
Mean hourly pay gap	50%	48%	39%	37%	35%
Median hourly pay gap	36%	32%	33%	33%	28%

\* Not published in 2017.

### 2021 ethnicity pay gap

	2020	2021
<b>Colleagues hourly pay gap</b>		
Mean hourly pay gap	15%	14%
Median hourly pay gap	13%	22%
<b>Self-employed hourly pay gap</b>		
Mean hourly pay gap	-15%	-29%
Median hourly pay gap	-9%	-48%
<b>Combined hourly pay gap</b>		
Mean hourly pay gap	23%	24%
Median hourly pay gap	22%	23%

A negative percentage figure indicates a bonus pay gap in favour of Black, Asian and Minority Ethnic colleagues.



### Our gender and ethnicity pay gap

In March 2022, we published our fifth gender pay gap report and marked the second time we voluntarily included details of our ethnicity pay gap.

[Read our latest Gender and ethnicity pay gap report](#)

## BUSINESS AMBITION FOR 1.5°C

### Net Zero by 2030

DWF is responding to an urgent call-to-action for companies to set emissions reduction targets in line with a 1.5°C future, backed by a global network of UN agencies, business and industry leaders. We signed the Business Ambition for 1.5°C commitment, a campaign led by the Science Based Targets initiative in partnership with the UN Global Compact and the We Mean Business coalition, demonstrating the highest level of ambition on climate and paving the way to a Net Zero future.

### Sustainability indices and ratings



Carbon Disclosure Project



Member of the FTSE4Good Index Series



BITC Responsible Business Tracker



RS&I Sustainable Lawyers



Tax Transparency  
[Refer to Annual Report and Accounts \(ARA\)](#)

# GRI disclosures

<b>Statement of use</b>	DWF Group has reported the information cited in this GRI content index for the period 2021/22 with reference to the GRI Standards.		
<b>GRI 1 used</b>	GRI 1: Foundation 2021		
<b>GRI Standard</b>	<b>Disclosure</b>	<b>Description</b>	
<b>GRI 2: General Disclosures 2021</b>	2-1 Organizational details	report its legal name	Cover page of ESG Impact Report 2021/22
		report its nature of ownership and legal form	Page 164 to 166 of ARA 2022
		report the location of its headquarters	Page 5 of ESG Impact Report 2021/22
		report its countries of operation	Page 5 of ESG Impact Report 2021/22
	2-2 Entities included in the organization's sustainability reporting	all entities included in the organisation's sustainability reporting	Page 4 of ESG Impact Report 2021/22
		if the organization has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting;  if the organization consists of multiple entities, explain the approach used for consolidating the information, including: i. whether the approach involves adjustments to information for minority interests; how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities; ii. whether and how the approach differs across the disclosures in this Standard and across material topics.	Page 130 to 131 of ARA 2022  Page 130 to 131 of ARA 2022
	2-3 Reporting period, frequency and contact point	specify the reporting period for, and the frequency of, its sustainability reporting;	Page 4 of ESG Impact Report 2021/22
		specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this;	Page 4 of ESG Impact Report 2021/22
		specify the contact point for questions about the report or reported information	Page 52 of ESG Impact Report 2021/22
	2-5 External assurance	describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved;	Page 10 of ESG Impact Report 2021/22
if the organization's sustainability reporting has been externally assured: i. provide a link or reference to the external assurance report(s) or assurance statement(s); ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process; iii. describe the relationship between the organization and the assurance provider.		Page 4 of ESG Impact Report 2021/22	
report the sector(s) in which it is active;		Page 5 of ESG Impact Report 2021/22	
2-6 Activities, value chain and other business relationships	describe its value chain, including: i. the organization's activities, products, services, and markets served; ii. the organization's supply chain; iii. the entities downstream from the organization and their activities	Page 5 of ESG Impact Report 2021/22	
		Page 5 of ESG Impact Report 2021/22	
2-7 Employees	report the total number of employees, and a breakdown of this total by gender and by region	Page 20 (UK only) of ESG Impact Report 2021/22	

## GRI disclosures continued

GRI Standard	Disclosure	Description	
<b>GRI 2: General Disclosures 2021 continued</b>	2-9 Governance structure and composition	<p>describe its governance structure, including committees of the highest governance body</p> <p>list the committees of the highest governance body that are responsible for decision making on and overseeing the management of the organization's impacts on the economy, environment, and people</p> <p>describe the composition of the highest governance body and its committees by:</p> <ul style="list-style-type: none"> <li>i. executive and non-executive members;</li> <li>ii. independence;</li> <li>iii. tenure of members on the governance body;</li> <li>iv. number of other significant positions and commitments held by each member, and the nature of the commitments;</li> <li>v. gender;</li> <li>vi. under-represented social groups;</li> <li>vii. competencies relevant to the impacts of the organization;</li> <li>viii. stakeholder representation</li> </ul>	<p>Page 69 of ARA 2022</p> <p>Page 69 of ARA 2022</p> <p>Pages 58 and 59 of ARA 2022</p>
	2-10 Nomination and selection of the highest governance body	<p>describe the nomination and selection processes for the highest governance body and its committees</p> <p>describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration:</p> <ul style="list-style-type: none"> <li>i. views of stakeholders (including shareholders);</li> <li>ii. diversity;</li> <li>iii. independence;</li> <li>iv. competencies relevant to the impacts of the organization</li> </ul>	<p>Page 69 to 71 of ARA 2022</p> <p>Page 69 to 71 of ARA 2022</p>
	2-11 Chair of the highest governance body	report whether the chair of the highest governance body is also a senior executive in the organization	Page 58 of ARA 2022
	2-12 Role of the highest governance body in overseeing the management of impacts	<p>describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development</p> <p>describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people, including:</p> <ul style="list-style-type: none"> <li>i. whether and how the highest governance body engages with stakeholders to support these processes;</li> <li>ii. how the highest governance body considers the outcomes of these processes</li> </ul> <p>describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review</p>	<p>Page 106 of ARA 2022</p> <p>Page 10 of ESG Impact Report 2021/22</p> <p>Page 10 of ESG Impact Report 2021/22</p>
	2-13 Delegation of responsibility for managing impacts	<p>describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people, including:</p> <ul style="list-style-type: none"> <li>i. whether it has appointed any senior executives with responsibility for the management of impacts;</li> <li>ii. whether it has delegated responsibility for the management of impacts to other employees</li> </ul> <p>describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people</p>	<p>Page 10 of ESG Impact Report 2021/22</p> <p>Page 10 of ESG Impact Report 2021/22</p>

## GRI disclosures continued

GRI Standard	Disclosure	Description		
<b>GRI 2: General Disclosures 2021 continued</b>	2-14 Role of the highest governance body in sustainability reporting	report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information	Page 10 of ESG Impact Report 2021/22	
	2-16 Communication of critical concerns	describe whether and how critical concerns are communicated to the highest governance body	Page 10 of ESG Impact Report 2021/22	
	2-17 Collective knowledge of the highest governance body	report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development	Page 69 of ARA 2022	
	2-18 Evaluation of the performance of the highest governance body		describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people	Page 106 of ARA 2022
			describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices	Page 106 of ARA 2022
	2-19 Remuneration policies		describe the remuneration policies for members of the highest governance body and senior executives, including: <ul style="list-style-type: none"> <li>i. fixed pay and variable pay;</li> <li>ii. sign-on bonuses or recruitment incentive payments;</li> <li>iii. termination payments;</li> <li>iv. clawbacks;</li> <li>v. retirement benefits</li> </ul>	Page 107 of ARA 2022
			describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people	Page 106 of ARA 2022
	2-20 Process to determine remuneration		describe the process for designing its remuneration policies and for determining remuneration, including: whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration; <ul style="list-style-type: none"> <li>i. how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration;</li> <li>ii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives</li> </ul>	Page 91 to 95 of ARA 2022
			report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable	Page 109 of ARA 2022
	2-21 Annual total compensation ratio		report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual)	Page 111 of ARA 2022
report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual)			Page 111 of ARA 2022	
report contextual information necessary to understand the data and how the data has been compiled Ratio formulae provided in GRI disclosure			Page 111 of ARA 2022	

## GRI disclosures continued

GRI Standard	Disclosure	Description	
GRI 2: General Disclosures 2021 continued	2-22 Statement on sustainable development strategy	report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development	Page 3 of ESG Impact Report 2021/22
	2-23 Policy commitments	describe its policy commitments for responsible business conduct, including: <ul style="list-style-type: none"> <li>i. the authoritative intergovernmental instruments that the commitments reference;</li> <li>ii. whether the commitments stipulate conducting due diligence;</li> <li>iii. whether the commitments stipulate applying the precautionary principle;</li> <li>iv. whether the commitments stipulate respecting human rights</li> </ul>	Page 34 to 35 of ESG Impact Report 2021/22
		describe its specific policy commitment to respect human rights, including: <ul style="list-style-type: none"> <li>i. the internationally recognized human rights that the commitment covers; the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment</li> </ul>	Page 34 to 35 of ESG Impact Report 2021/22
		provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this	Page 34 to 35 of ESG Impact Report 2021/22
		report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level	Page 34 to 35 of ESG Impact Report 2021/22
		report the extent to which the policy commitments apply to the organization's activities and to its business relationships	Page 34 to 35 of ESG Impact Report 2021/22
		describe how the policy commitments are communicated to workers, business partners, and other relevant parties	Page 34 to 35 of ESG Impact Report 2021/22
	2-24 Embedding policy commitments	describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships, including: <ul style="list-style-type: none"> <li>i. how it allocates responsibility to implement the commitments across different levels within the organization;</li> <li>ii. how it integrates the commitments into organizational strategies, operational policies, and operational procedures;</li> <li>iii. how it implements its commitments with and through its business relationships;</li> <li>iv. training that the organization provides on implementing the commitments</li> </ul>	Page 34 to 35 of ESG Impact Report 2021/22

## GRI disclosures continued

GRI Standard	Disclosure	Description		
<b>GRI 2: General Disclosures 2021 continued</b>	2-25 Processes to remediate negative impacts	describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to	Page 34 of ESG Impact Report 2021/22	
		describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in	Page 34 of ESG Impact Report 2021/22	
		describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to	Page 34 of ESG Impact Report 2021/22	
		describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms	Page 34 of ESG Impact Report 2021/22	
		describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback	Page 34 to 35 of ESG Impact Report 2021/22	
<b>GRI 2: General Disclosures 2021 continued</b>	2-26 Mechanisms for seeking advice and raising concerns	describe the mechanisms for individuals to: <ul style="list-style-type: none"> <li>i. seek advice on implementing the organization's policies and practices for responsible business conduct;</li> <li>ii. raise concerns about the organization's business conduct</li> </ul>	Page 34 to 35 of ESG Impact Report 2021/22	
		2-27 Compliance with laws and regulations	report the total number and the monetary value of fines for instances of non compliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by: <ul style="list-style-type: none"> <li>i. fines for instances of non-compliance with laws and regulations that occurred in the current reporting period;</li> <li>ii. fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods</li> </ul>	Page 9 of ESG Impact Report 2021/22
			2-29 Approach to stakeholder engagement	describe its approach to engaging with stakeholders, including: <ul style="list-style-type: none"> <li>i. the categories of stakeholders it engages with, and how they are identified;</li> <li>ii. the purpose of the stakeholder engagement;</li> <li>iii. how the organization seeks to ensure meaningful engagement with stakeholders</li> </ul>
<b>GRI 3: Material Topics 2021</b>	3-1 Process to determine material topics	describe the process it has followed to determine its material topics, including: <ul style="list-style-type: none"> <li>how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships</li> </ul>	Page 8 of ESG Impact Report 2021/22	
		specify the stakeholders and experts whose views have informed the process of determining its material topics	Page 7 of ESG Impact Report 2021/22	

## GRI disclosures continued

GRI Standard	Disclosure	Description	
<b>GRI 3: Material Topics 2021 continued</b>	3-2 List of material topics	list its material topics	Page 8 of ESG Impact Report 2021/22
	3-3 Management of material topics	describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights	Page 6, 10, 11 of ESG Impact Report 2021/22
		report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships	Page 6, 10, 11 of ESG Impact Report 2021/22
		describe its policies or commitments regarding the material topic	Page 6, 10, 11 of ESG Impact Report 2021/22
		describe actions taken to manage the topic and related impacts, including: <ul style="list-style-type: none"> <li>i. actions to prevent or mitigate potential negative impacts;</li> <li>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</li> <li>iii. actions to manage actual and potential positive impacts</li> </ul>	Page 6, 10, 11 of ESG Impact Report 2021/22
report the following information about tracking the effectiveness of the actions taken: <ul style="list-style-type: none"> <li>i. processes used to track the effectiveness of the actions;</li> <li>ii. goals, targets, and indicators used to evaluate progress;</li> <li>iii. the effectiveness of the actions, including progress toward the goals and targets; lessons learned and how these have been incorporated into the organization's operational policies and procedures</li> </ul>	Page 6, 10, 11 of ESG Impact Report 2021/22		
		describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)	Page 10 to 11 of ESG Impact Report 2021/22
<b>GRI 203: Indirect Economic Impacts 2016</b>	203-1 Infrastructure investments and services supported	The reporting organization shall report the following information: <ul style="list-style-type: none"> <li>a. Extent of development of significant infrastructure investments and services supported.</li> <li>b. Current or expected impacts on communities and local economies, including positive and negative impacts where relevant.</li> <li>c. Whether these investments and services are commercial, in-kind, or pro bono engagements</li> </ul>	Page 28 of ESG Impact Report 2021/22
	203-2 Significant indirect economic impacts	The reporting organization shall report the following information: <ul style="list-style-type: none"> <li>a. Examples of significant identified indirect economic impacts of the organization, including positive and negative impacts.</li> <li>b. Significance of the indirect economic impacts in the context of external benchmarks and stakeholder priorities, such as national and international standards, protocols, and policy agendas.</li> </ul>	Page 52 to 56 of ARA 2022
	204-1 Proportion of spending on local suppliers	The organization's geographical definition of 'local'  The definition used for 'significant locations of operation'	Page 21 of ESG Impact Report 2021/22  Page 21 of ESG Impact Report 2021/22
<b>GRI 205: Anti-corruption 2016</b>	205-1 Operations assessed for risks related to corruption	Total number and percentage of operations assessed for risks related to corruption	Page 54 of ARA 2022
		Significant risks related to corruption identified through the risk assessment	Page 54 of ARA 2022

## GRI disclosures continued

GRI Standard	Disclosure	Description	
<b>GRI 205: Anti-corruption 2016 continued</b>	205-2 Communication and training about anti-corruption policies and procedures	Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region.	Page 66 of ARA 2022
		Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region	Page 68 of ARA 2022
		Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations	Page 68 of ARA 2022
		Total number and percentage of governance body members that have received training on anti-corruption, broken down by region	Page 68 of ARA 2022
		Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region	Page 68 of ARA 2022
	205-3 Confirmed incidents of corruption and actions taken	Total number and nature of confirmed incidents of corruption	Page 9 of ESG Impact Report 2021/22
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the organization	Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used	Page 43 and 44 of ARA 2022
		Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used	Page 43 and 44 of ARA 2022
		In joules, watt-hours or multiples, the total: <ul style="list-style-type: none"> <li>i. electricity consumption</li> <li>ii. heating consumption</li> <li>iii. cooling consumption</li> <li>iv. steam consumption</li> </ul>	Page 43 and 44 of ARA 2022
		In joules, watt-hours or multiples, the total: <ul style="list-style-type: none"> <li>i. electricity sold</li> <li>ii. heating sold</li> <li>iii. cooling sold</li> <li>iv. steam sold</li> </ul>	Page 43 and 44 of ARA 2022
		Total energy consumption within the organization, in joules or multiples	Page 43 and 44 of ARA 2022
		Standards, methodologies, assumptions, and/or calculation tools used	Page 44 of the ESG Impact Report 2021/22
		Source of the conversion factors used	Page 44 of the ESG Impact Report 2021/22

## GRI disclosures continued

GRI Standard	Disclosure	Description	
GRI 302: Energy 2016 continued	302-2 Energy consumption outside of the organization	Energy consumption outside of the organization, in joules or multiples	Page 43 and 44 of ARA 2022
		Standards, methodologies, assumptions, and/or calculation tools used	Page 43 and 44 of ARA 2022
		Source of the conversion factors used	Page 43 and 44 of ARA 2022
	302-3 Energy intensity	Energy intensity ratio for the organization	Page 43 and 44 of ARA 2022
		Organization-specific metric (the denominator) chosen to calculate the ratio	Page 43 and 44 of ARA 2022
		Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all	Page 43 and 44 of ARA 2022
		Whether the ratio uses energy consumption within the organization, outside of it, or both	Page 43 and 44 of ARA 2022
	302-4 Reduction of energy consumption	Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples	Page 43 and 44 of ARA 2022
		Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all	Page 43 and 44 of ARA 2022
		Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it	Page 43 and 44 of ARA 2022
		Standards, methodologies, assumptions, and/or calculation tools used	Page 43 and 44 of ARA 2022
	302-5 Reductions in energy requirements of products and services	Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples	Page 43 and 44 of ARA 2022
		Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it	Page 43 and 44 of ARA 2022
		Standards, methodologies, assumptions, and/or calculation tools used	Page 43 and 44 of ARA 2022

## GRI disclosures continued

GRI Standard	Disclosure	Description	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Gross direct (Scope 1) GHG emissions in metric tons of CO <sub>2</sub> equivalent.	Page 43 and 44 of ARA 2022
		Gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> or all.	Page 43 and 44 of ARA 2022
		Biogenic CO <sub>2</sub> emissions in metric tons of CO <sub>2</sub> equivalent	Page 43 and 44 of ARA 2022
		Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions	Page 43 and 44 of ARA 2022
		Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source	Page 43 and 44 of ARA 2022
		Consolidation approach for emissions; whether equity share, financial control, or operational control	Page 43 and 44 of ARA 2022
		Standards, methodologies, assumptions, and/or calculation tools used	Page 43 and 44 of ARA 2022
	305-2 Energy indirect (Scope 2) GHG emissions	Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO <sub>2</sub> equivalent	Page 43 and 44 of ARA 2022
		If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO <sub>2</sub> equivalent	Page 43 and 44 of ARA 2022
		If available, the gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , or all	Page 43 and 44 of ARA 2022
		Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; the context for any significant changes in emissions that triggered recalculations of base year emissions.	Page 43 and 44 of ARA 2022
		Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	Page 43 and 44 of ARA 2022
		Consolidation approach for emissions; whether equity share, financial control, or operational control	Page 43 and 44 of ARA 2022
		Standards, methodologies, assumptions, and/or calculation tools used	Page 43 and 44 of ARA 2022

## GRI disclosures continued

GRI Standard	Disclosure	Description	
<b>GRI 305: Emissions 2016 continued</b>	305-3 Other indirect (Scope 3) GHG emissions	Gross other indirect (Scope 3) GHG emissions in metric tons of CO <sub>2</sub> equivalent	Page 43 and 44 of ARA 2022
		If available, the gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , or all.	Page 43 and 44 of ARA 2022
		Biogenic CO <sub>2</sub> emissions in metric tons of CO <sub>2</sub> equivalent	Page 43 and 44 of ARA 2022
		Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.	Page 43 and 44 of ARA 2022
		Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; the context for any significant changes in emissions that triggered recalculations of base year emissions.	Page 43 and 44 of ARA 2022
		Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	Page 43 and 44 of ARA 2022
	305-4 GHG emissions intensity	Standards, methodologies, assumptions, and/or calculation tools used.	Page 43 and 44 of ARA 2022
		GHG emissions intensity ratio for the organization.	Page 43 and 44 of ARA 2022
		Organization-specific metric (the denominator) chosen to calculate the ratio.	Page 43 and 44 of ARA 2022
		Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).	Page 43 and 44 of ARA 2022
	305-5 Reduction of GHG emissions	Gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> or all.	Page 43 and 44 of ARA 2022
		GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO <sub>2</sub> equivalent	Page 43 and 44 of ARA 2022
Gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> or all.		Page 43 and 44 of ARA 2022	
Base year or baseline, including the rationale for choosing it.		Page 43 and 44 of ARA 2022	
Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).		Page 43 and 44 of ARA 2022	
Standards, methodologies, assumptions, and/or calculation tools used.		Page 43 and 44 of ARA 2022	
<b>GRI 306: Waste 2020</b>	306-2 Management of significant waste-related impacts	If the waste generated by the organization in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations.	Page 14 of ARA 2022
		The processes used to collect and monitor waste-related data.	Page 14 of ARA 2022
	306-3 Waste generated	Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.	Page 43 of ARA 2022
		Contextual information necessary to understand the data and how the data has been compiled.	Page 43 of ARA 2022
	306-4 Waste diverted from disposal	Total weight of waste diverted from disposal in metric tons, and a breakdown of this total by composition of the waste.	Page 43 of ARA 2022

## GRI disclosures continued

GRI Standard	Disclosure	Description	
<b>GRI 401: Employment 2016</b>	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	The reporting organization shall report the following information: a. Benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation. These include, as a minimum: i. life insurance; ii. health care; iii. disability and invalidity coverage; iv. parental leave; v. retirement provision; vi. stock ownership; vii. others. b. The definition used for 'significant locations of operation'.	Page 24 to 26 of ESG Impact Report 2021/22
<b>GRI 403: Occupational Health and Safety 2018</b>	403-2 Hazard identification, risk assessment, and incident investigation	A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including: i. how the organization ensures the quality of these processes, including the competency of persons who carry them out; ii. how the results of these processes are used to evaluate and continually improve the occupational health and safety management system.	Page 23 of ESG Impact Report 2021/22
	403-3 Occupational health services	A description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organization ensures the quality of these services and facilitates workers' access to them	Page 15 of ESG Impact Report 2021/22
	403-5 Worker training on occupational health and safety	A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations	Page 25 of ESG Impact Report 2021/22
	403-6 Promotion of worker health	An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided	Page 23 of ESG Impact Report 2021/22
		A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs	Page 23 of ESG Impact Report 2021/22
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	A description of the organization's approach to preventing or mitigating significant negative occupational health and safety impacts that are directly linked to its operations, products, or services by its business relationships, and the related hazards and risks	Page 23 of ESG Impact Report 2021/22	

## GRI disclosures continued

GRI Standard	Disclosure	Description	
<b>GRI 403: Occupational Health and Safety 2018 continued</b>	403-9 Work-related injuries	<p>For all employees:</p> <ul style="list-style-type: none"> <li>i. The number and rate of fatalities as a result of work-related injury;</li> <li>ii. The number and rate of high-consequence work-related injuries (excluding fatalities);</li> <li>iii. The number and rate of recordable work-related injuries;</li> <li>iv. The main types of work-related injury;</li> <li>v. The number of hours worked</li> </ul> <hr/> <p>For all workers who are not employees but whose work and/or workplace is controlled by the organization:</p> <ul style="list-style-type: none"> <li>i. The number and rate of fatalities as a result of work-related injury;</li> <li>ii. The number and rate of high-consequence work-related injuries (excluding fatalities);</li> <li>iii. The number and rate of recordable work-related injuries;</li> <li>iv. The main types of work-related injury;</li> <li>v. The number of hours worked.</li> </ul>	Page 15 of ESG Impact Report 2021/22
	403-10 Work-related ill health	<p>For all employees:</p> <ul style="list-style-type: none"> <li>i. The number of fatalities as a result of work-related ill health;</li> <li>ii. The number of cases of recordable work-related ill health;</li> <li>iii. The main types of work-related ill health.</li> </ul> <hr/> <p>For all workers who are not employees but whose work and/or workplace is controlled by the organization:</p> <ul style="list-style-type: none"> <li>i. The number of fatalities as a result of work-related ill health;</li> <li>ii. The number of cases of recordable work-related ill health;</li> <li>iii. The main types of work-related ill health.</li> </ul>	Page 15 of ESG Impact Report 2021/22
<b>GRI 404: Training and Education 2016</b>	404-1 Average hours of training per year per employee	<p>The reporting organization shall report the following information:</p> <ul style="list-style-type: none"> <li>a. Average hours of training that the organization's employees have undertaken during the reporting period, by: <ul style="list-style-type: none"> <li>i. gender;</li> <li>ii. employee category.</li> </ul> </li> </ul>	Page 25 of ESG Impact Report 2021/22 (training hours only)
	404-2 Programs for upgrading employee skills and transition assistance programs	<p>The reporting organization shall report the following information:</p> <ul style="list-style-type: none"> <li>a. Type and scope of programs implemented and assistance provided to upgrade employee skills.</li> <li>b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.</li> </ul>	Page 26 of ESG Impact Report 2021/22
	404-3 Percentage of employees receiving regular performance and career development reviews	<ul style="list-style-type: none"> <li>a. Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.</li> </ul>	Page 26 of ESG Impact Report 2021/22

## GRI disclosures continued

GRI Standard	Disclosure	Description	
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	<p>Percentage of individuals within the organization's governance bodies in each of the following diversity categories:</p> <ul style="list-style-type: none"> <li>i. Gender;</li> <li>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</li> </ul> <p>Other indicators of diversity where relevant (such as minority or vulnerable groups).</p>	Page 20 of ESG Impact Report 2021/22 (gender only)
		<p>Percentage of employees per employee category in each of the following diversity categories:</p> <ul style="list-style-type: none"> <li>i. Gender;</li> <li>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</li> </ul> <p>Other indicators of diversity where relevant (such as minority or vulnerable groups).</p>	Page 20 of ESG Impact Report 2021/22 (gender only)
	405-2 Ratio of basic salary and remuneration of women to men	<p>Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation</p> <p>The definition used for 'significant locations of operation'</p>	Page 20 of ESG Impact Report 2021/22
<b>GRI 413: Local Communities 2016</b>	413-1 Operations with local community engagement, impact assessments, and development programs	<p>Percentage of operations with implemented local community engagement, impact assessments, and/or development programs, including the use of:</p> <ul style="list-style-type: none"> <li>i. social impact assessments, including gender impact assessments, based on participatory processes;</li> <li>ii. environmental impact assessments and ongoing monitoring;</li> <li>iii. public disclosure of results of environmental and social impact assessments;</li> <li>iv. local community development programs based on local communities' needs;</li> <li>v. stakeholder engagement plans based on stakeholder mapping;</li> <li>vi. broad based local community consultation committees and processes that include vulnerable groups;</li> <li>vii. works councils, occupational health and safety committees and other worker representation bodies to deal with impacts;</li> <li>viii. formal local community grievance processes.</li> </ul>	Page 5 of ESG Impact Report 2021/22 Page 28 to 31 of ESG Impact Report 2021/22

## Forward-looking statement

All statements other than statements of historical or current facts, including statements regarding our ESG plans and goals made in this document, are forward-looking. Forward-looking statements reflect current expectations and are inherently uncertain. Actual results could differ materially from current expectations.

If you have any questions about this report or the reported information within it, please contact:

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