



# ENVIRONMENTAL, SOCIAL GOVERNANCE POLICY

APRIL 22 – V 1.0

GEM-EMS-05

**PUBLIC**

THIS DOCUMENT ENCOMPASSES INFORMATION THAT CAN BE RELEASED  
OUTSIDE OF GEMSERV. THIS DOCUMENT DOES NOT INCLUDE ANY CONFIDENTIAL, PERSONAL OR SENSITIVE  
INFORMATION



**Gemserv**



# CONTENTS

|  |          |
|--|----------|
| <b>GEMSERV'S ENVIRONMENTAL, SOCIAL &amp; GOVERNANCE POLICY</b> .....   | <b>4</b> |
| <b>1. INTRODUCTION</b> .....   | <b>4</b> |
| <b>2. OUR ORGANISATION</b> .....                                       | <b>4</b> |
| VALUES & PHILOSOPHY .....  | 4        |
| <b>3. OUR GOVERNANCE</b> .....   | <b>5</b> |
| B-CORPORATION .....  | 5        |
| <b>4. OUR MARKETS, CLIENTS &amp; SUPPLY CHAIN</b> .....                | <b>6</b> |
| INTRODUCTION.....  | 6        |
| PRINCIPLES OF WHAT WE WILL DO, WHAT WE WON'T DO.....                   | 6        |
| SOCIAL VALUE .....   | 6        |
| STANDARDS OF CUSTOMER SERVICE .....                                    | 7        |
| OUR SUPPLY CHAIN.....  | 7        |
| <b>5. OUR EMPLOYEES</b> .....  | <b>7</b> |
| INTRODUCTION.....  | 7        |
| WHISTLEBLOWING .....   | 7        |
| MENTAL WELLBEING.....  | 7        |
| IIP GOLD STANDARD.....   | 7        |
| SUSTAINABLE HOLIDAY TRAVEL.....  | 8        |
| FLEXIBLE WORKING.....  | 8        |
| CYCLE TO WORK AND EV (ELECTRIC VEHICLES) SALARY SACRIFICE SCHEMES..... | 8        |
| SUSTAINABLE/ETHICAL PENSION OPTIONS.....                               | 8        |
| LIVING WAGE EMPLOYER .....   | 8        |
| FREE EMPLOYEE ASSISTANCE SCHEME .....                                  | 8        |
| PROFESSIONAL DEVELOPMENT PROGRAMME.....                                | 9        |
| EQUALITY DIVERSITY AND INCLUSION .....                                 | 9        |
| <b>6. BUSINESS CONDUCT</b> .....                                       | <b>9</b> |
| INTRODUCTION.....  | 9        |
| ANTI-BRIBERY AND CORRUPTION .....                                      | 9        |

MODERN SLAVERY ..... 9

WHISTLEBLOWING ..... 10

SUSTAINABLE TRADING ..... 10

FINANCIAL..... 10

ETHICAL ..... 10

ENVIRONMENTAL ..... 10

**7. SUPPORTING COMMUNITIES AND CHARITIES ..... 11**

**8. ACCREDITATIONS AND CERTIFICATIONS ..... 11**

**9. MEASURING AND REPORTING OUR IMPACT ..... 12**

**10. KPIS, AND TARGETS TO IMPROVE ..... 12**

# GEMSERV'S ENVIRONMENTAL, SOCIAL & GOVERNANCE POLICY

## 1. INTRODUCTION

This document sets out Gemserv's ESG policy. It includes our philosophy and approach and should be read in conjunction with the more detailed subject matter policies to which it refers. This document has been approved by the Gemserv Board of Directors (the "Board") and is reviewed at least annually.

## 2. OUR ORGANISATION

Gemserv is an expert provider of professional services in a world driven by data and technology. Our purpose is: Making things that matter work better for everyone.

We believe businesses must do more than simply make a profit, they must discharge a wider responsibility to society and the environment. We embrace this ethos at Gemserv where we strive to make a positive, long term, and sustainable contribution in all that we do. We do not see this as a trade off with profitability. Indeed, ESG is a driver of efficiency and growth as well as being the right thing to do. We refer to it as 'profit with purpose'. Our staff, and increasingly, our clients, expect nothing less.

### VALUES & PHILOSOPHY

Gemserv is committed to operating our business with integrity, supporting environmental responsibility, and building a diverse and inclusive workplace where our employees can thrive. We continue to be dedicated to acting in the long-term interests of our stakeholders; this has been a cornerstone of our culture throughout, and this core value continues to shape our company. This philosophy also motivates us to volunteer and provide resources for organisations that strengthen the communities where we live and work as well as our global community. By focusing on these guiding principles, we believe we are contributing to a successful future – for our clients, our employees, our industries, our communities and the environment.

Our company values reflect this approach and the key behaviours we expect of our staff:

**Innovative** – We challenge convention, bring fresh ideas and embrace diversity and change.

**Insightful** – We apply our trusted and unrivalled skills, knowledge and experience.

**Collaborative** – We listen and inform, working together with honesty and respect.

**Impactful** – We are passionate about making a difference.

### 3. OUR GOVERNANCE

Gemserv's Board is committed to the highest standards of corporate governance and believes that such standards are essential to business integrity and performance. To this end, the Board has agreed to adopt the Wates Corporate Governance Principles for Large Private Companies, as published by the Financial Reporting Council, and we make a statement against each of these in our annual report.

The Wates Corporate Governance Principles are:

- Purpose and leadership
- Board composition
- Director responsibilities
- Opportunity and risk
- Remuneration
- Stakeholder engagement and relations

The Board engages in the following activities to support the company's ESG framework:

- Developing an organisational ESG strategy in collaboration with employees
- Overseeing ESG activities at the company in accordance with this policy and encouraging continual improvement in the integration of ESG factors in company-wide decision-making and remuneration
- Supporting collaboration with other organizations to drive forward the integration of, and transparency with respect to, ESG factors
- Overseeing ESG training and guidance for employees
- Evaluating and monitoring ESG factors across the company, and approving our ESG impact report

#### B-CORPORATION

As a further step in our continual improvement journey, Gemserv are in the process of applying to become a certified B-Corporation (B-Corp). This certification requires us to demonstrate high social and environmental performance, make a legal commitment to be accountable to all stakeholders and to exhibit transparency in allowing our ESG performance to be published.

In 2021, the Board and Shareholders agreed changes the Gemserv's company Articles to align with the B-Corp requirement for companies to be legally required to consider the impact of their decisions on all their stakeholders.

## 4. OUR MARKETS, CLIENTS & SUPPLY CHAIN

### INTRODUCTION

We support fair markets for business and consumers, delivering exceptional service and value for money to our clients and treating our suppliers in the same way as we would expect to be treated by others.

### PRINCIPLES OF WHAT WE WILL DO, WHAT WE WONT DO

We endeavour to work only with organisations (whether clients or suppliers) which share the same ethical standards and practices as ourselves. To this end we have established a non-exhaustive list of principles to guide our decision-making on this:

**Serving Governments Tied to Human Rights Violations** - We will not work for such a government if there is a substantial risk that our services are tied to or complicit in human rights violations.

**Fossil Fuels** - we will not work with fossil fuel companies which have not aligned themselves with the transition to net zero and the Paris Climate Change Agreement.

**Gambling** - we will not work with organisations if they are unable to demonstrate that they have met the highest possible set of practices to sufficiently manage the potentially negative impact of gambling.

**Modern Slavery** - we will not work with organisations that are unable to demonstrate compliance with the Modern Slavery Act 2015 (see section 6).

Furthermore, as we are applying for B-Corp certification, we will not undertake any activities prohibited by B-Corp's disqualifying factors.

### SOCIAL VALUE

When bidding for government contracts we will consider and highlight how the delivery of the work can contribute to the government's social value priorities including:

- Post covid-19 recovery
- Tackling economic inequality, including creating new businesses, jobs, and skills
- Increasing supply chain resilience
- Fighting climate change and the environmental emergency (inc decline in natural capital)
- Reducing waste
- 'Levelling Up' agenda
- Driving equal opportunity
- Reducing the disability employment gap and tackling workforce inequality

- Improving health and wellbeing and community integration

## STANDARDS OF CUSTOMER SERVICE

We are a trusted and strategic partner to our clients, and always aim to deliver exceptional service. We endeavour to ensure our services and our supply chain consider and manage the ESG impacts of every contract. We are constantly looking to improve by investing in our existing services, developing new capabilities, and providing development opportunities and rewarding work for our staff.

## OUR SUPPLY CHAIN

When establishing relationships with third parties, Gemserv will continue to ensure that our core values and standards are upheld by undertaking appropriate due diligence prior to selection, and by regular audit of those third parties while contracts are in place. Our due diligence approaches include factors for environment, security, quality, as well as their wider ESG stance. We also screen against the principles noted above on the types of organisations we will and will not work with.

## 5. OUR EMPLOYEES

### INTRODUCTION

We are a people business and work hard to attract, retain, and develop our staff so that they can reach their full potential. We have flexible and inclusive working practices and value the different perspectives that people bring to the workplace, establishing diverse, inclusive, and flexible teams. Below is a summary of our main ESG related policies for employees.

### WHISTLEBLOWING

We have a whistleblowing policy to ensure that staff feel safe and valued in their day-to-day work and can identify concerns if they need to.

### MENTAL WELLBEING

We have provided staff with mental health awareness training, including establishing a network of mental health first-aiders and a free employee assistance scheme.

### IIP GOLD STANDARD

Gemserv has been awarded the prestigious Investors in People Gold standard, placing the organisation amongst the best companies to work for in the UK. The award of the gold standard was accredited following a rigorous assessment process

including in depth interviews with staff. Almost 90% of employees said they felt Gemserv was a “great place to work” and an “excellent culture of equality” has been fostered, ensuring people feel valued for who they are.

## SUSTAINABLE HOLIDAY TRAVEL

Gemserv is committed to having a positive social and environmental impact and recognises that staff have a significant role to play in responding to the urgent challenge of climate change and environmental decline. We aim to encourage our employees to ‘walk the talk’ when it comes to sustainability behaviour and offer an extra day of paid leave to encourage staff to make more sustainable travel choices (for example, to compensate when alternatives to flying to take longer).

## FLEXIBLE WORKING

Gemserv recognises the benefits of a healthy working life, and this policy aims to provide flexibility for employees to balance their work life and personal life commitments by allowing employees to work flexibility providing they can satisfactorily perform their role.

## CYCLE TO WORK AND EV (ELECTRIC VEHICLES) SALARY SACRIFICE SCHEMES

We offer employees a cycle to work scheme and an electric vehicle scheme. These are designed to encourage employees to switch to more sustainable travel modes by making the ownership more affordable through salary sacrifice.

## SUSTAINABLE/ETHICAL PENSION OPTIONS

Employees are provided with the option of choosing a ‘green/ethical/socially responsible’ pension option. This allows them the choice of socially responsible investing which, in turn contributes to more positive social and environmental outcomes.

## LIVING WAGE EMPLOYER

Gemserv is an Accredited Living Wage Employer and has been certified by the Living Wage Foundation. We are committed to paying our staff at least the living wage (and London living wage for those based at our HQ) and expect the same of our suppliers.

## FREE EMPLOYEE ASSISTANCE SCHEME

Employees, their partners, and dependents have access to a confidential assistance service designed to help them deal with personal and professional problems that could be affecting their home or work life, health, and general wellbeing. This is available 24/7, 365 days a year.

## PROFESSIONAL DEVELOPMENT PROGRAMME

Gemserv believes that investing in our employees' professional and personal development is key to supporting the company's success. All employees are part of our professional development programme, supported by our Learning and Development Policy, which offers talent development and a career pathway within Gemserv. This is managed alongside our annual appraisal programme.

## EQUALITY DIVERSITY AND INCLUSION

In addition to training for role related competency, the Gemserv Board sponsors a range of internal training programs for all employees to promote awareness and encourage tolerance and understanding. These include diversity and inclusion training, Unconscious Bias training and a Reverse Mentoring Scheme. An annual Manager Training course is also provided. Our ED&I team champion and promote awareness within the company as part of our strategy to be an inclusive workplace. Annual pay gap reviews are undertaken and monitored which are reported at Board level. In addition, Gemserv takes part in various training initiatives including the Kingston University Beyond Barriers Scheme, DWP Kickstart Scheme and Government Apprenticeship Schemes.

## 6. BUSINESS CONDUCT

### INTRODUCTION

The Board holds Gemserv to the highest standards of business conduct. This includes ensuring regulatory compliance as well as activities that go 'beyond compliance' ensuring we act to the high standards we set ourselves. Below are the main policies behind this.

### ANTI-BRIBERY AND CORRUPTION

In line with The Bribery Act 2010 the Company expects that all associated persons will always work with integrity and follow the Company code of conduct. The Board attaches the utmost importance to this policy and operates a zero-tolerance approach to involvement with bribery and corruption by any of our employees or third-party representatives, whether by offering, promising, soliciting, demanding, giving, or accepting bribes or behaving corruptly in the expectation of a bribe or an advantage. It is expected by the Company that this policy will be always respected and adhered to by all employees and associated persons. Any breach of this policy will be regarded as gross misconduct by the Company and is likely to result in disciplinary action and further legal action.

### MODERN SLAVERY

Gemserv complies with the Modern Slavery Act 2015. This is an integral part of our Governance and Compliance framework and Gemserv's Code of Ethics where we confirm that we will not tolerate or condone abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected. We

take compliance with all legal and regulatory matters seriously and therefore maintain a zero-tolerance approach to modern slavery and human trafficking within the business, as well as from our supply chains. Gemserv acknowledges the responsibility to the Modern Slavery Act 2015 and endeavours to show complete transparency within the company, and is committed to work with its suppliers, contractors, and business partners to ensure the obligations of the Act are fulfilled.

## WHISTLEBLOWING

Gemserv also operates a Whistleblowing Policy, aimed principally at employees but also available to others working partners of Gemserv which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery and other areas. This policy is underpinned and signed off by Gemserv Board and applies to all Gemserv's business activities, employees & contractors, and properties.

## SUSTAINABLE TRADING

Gemserv is committed to building a financially, ethically, and environmentally sustainable business by driving towards its vision to ensure that complex markets work for everyone's benefit. These three standards of sustainability are important in the pursuit of our vision so, not only must we apply those standards in all that we do, but also consider them in relation to the clients, suppliers, and service providers with whom we work. The guidance below sets out each of those sustainability standards we consider when forging new, or deepening existing, relationships and when considering potential projects or assignments.

## FINANCIAL

We expect the highest standards of financial probity and integrity to be exercised by businesses or Governments with whom we work. We therefore look to work with businesses or Governments who reject, both in policy and practice, bribery, or corruption in all business dealings.

## ETHICAL

Human Rights are fundamental to the way that free societies operate. We expect the Governments and businesses with whom we work to respect the principles of basic Human Rights including Right to life, Freedom from torture, Freedom from slavery & forced labour and Protection from discrimination.

## ENVIRONMENTAL

We are a net contributor to better environmental outcomes. This is because the positive impact of the work we conduct far outweighs any negative environmental impact of our business operations.

We are working to better quantify and report our impacts, including the steps we take to reduce and mitigate any negative impacts from our operations. We measure our performance through implementation of an Environmental Management System (ISO14001) and by considering and calculating scope 1, 2 and 3 emissions for our Carbon Neutral status. We would

expect our clients, suppliers, and service providers to show similar respect by implementing procedures to comply with environmental legislation and to strive to adopt sustainable practices.

Within Gemserv, these practices include, but are not limited to:

- Purchasing recycled goods from sustainable sources where possible
- Establishing partnerships with other sustainable businesses
- Recycling of waste and a commitment to zero landfill for waste
- A dedicated Green Team to promote staff engagement initiatives and provide insights on ESG trends and best practice
- A commitment to achieve net zero by 2030 and we have published Carbon Reduction Plan on how to achieve this

## **7. SUPPORTING COMMUNITIES AND CHARITIES**

Gemserv supports several charities chosen by our staff. We also match-fund personal giving by staff for worthy causes. All staff are encouraged to take one paid volunteering day each year in their local communities. Gemserv are proud to be a supporter of those who serve and have signed the Armed Forces Covenant. This is a commitment to support the armed forces community and recognise the value serving personnel, both regular and reservists, veterans and military families contribute to our business and our country. We also donate annually to SSAFA (the armed forces charity).

## **8. ACCREDITATIONS AND CERTIFICATIONS**

Our approach is underpinned through a range of standards which we have maintained and improved over the years. These include:

- Environmental Management System ISO 14001:2015
- Information Security Management System ISO 27001:2017
- Quality Management System ISO 9001:2015
- B-Corp (application in progress)
- Carbon Neutral Company
- IASME Cyber Essentials Plus
- Data Protection Security Toolkit (DSPT (Data Security and Protection Toolkit))
- Plain English Campaign
- Investors In People Gold
- Fair Wage Employer
- Disability Confident Committed

In addition, Gemserv have committed to the SME (Small Medium Enterprises) Climate Hub, which is recognised by the United Nations Race to Zero campaign and signed up to the West Midlands Net zero business pledge.

## 9. MEASURING AND REPORTING OUR IMPACT

We report on our impact in our annual company report. This has hitherto focussed mainly on our operational impacts. Going forward we commit to produce an impact report in which we seek to quantify the impacts of the business we conduct as well as our operational impacts.

## 10. KPIS, AND TARGETS TO IMPROVE

The board monitors a range of KPIs on company ESG performance. These include:

- Company Purpose and Values drive decision-making
- Voluntary staff turn-over and sickness absence
- Gender and BAME balance
- Gender pay gap
- Career progression by high potential staff
- Gemserv's equality, diversity, and inclusion maturity
- Wellbeing and Health & Safety
- Development opportunities for staff
- Measurement of positive ESG impacts by contract
- Achieving B-Corp accreditation
- Carbon emissions
- Recycling rates
- Volunteering and community work
- Charity fundraising
- Supply chain impacts

Our 2021/2022 Impact Report will be publicly available in Q3 2022.

Approved by the Board on 30<sup>th</sup> March 2022



Alex Goody

Chief Executive

March 2022



To find out more please contact:  
**Governance Risk & Compliance**  
T: 020 7090 1001  
E: [grc@gemserv.com](mailto:grc@gemserv.com)  
W: [www.gemserv.com](http://www.gemserv.com)

**London Office:**  
8 Fenchurch Place  
London  
EC3M 4AJ

**Company Reg. No: 4419878**

