



Travel
Department
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Travel Department HIGH LEVEL ESG REVIEW

Year 2

Iteration 3

01/01/2024 – 31/12/2024

Reporting Period: 01/01/2024-31/12/2024	
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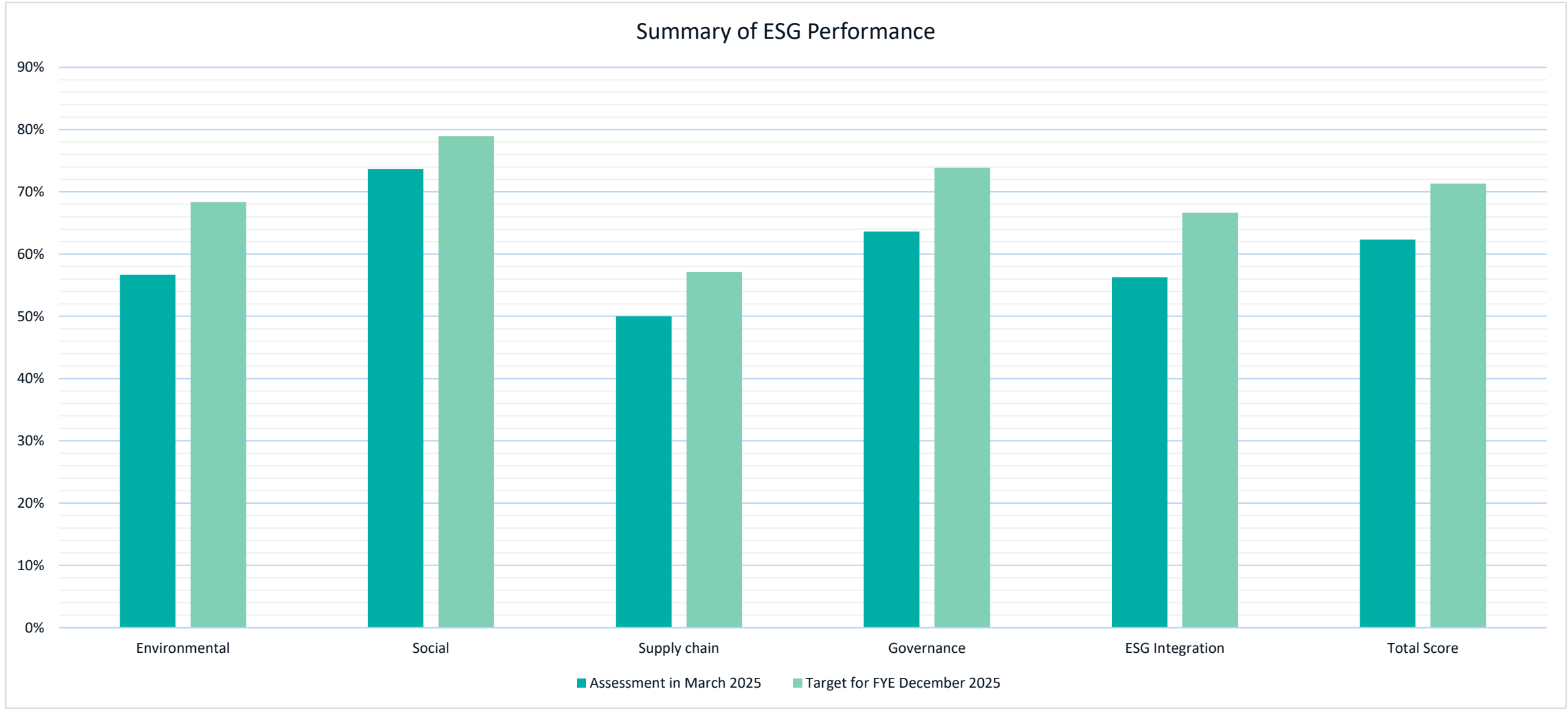
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EXECUTIVE SUMMARY

ESG SCORE IN MARCH 2025

This document will showcase the ESG journey Travel Department has undertaken since its previous score in March 2024 and, subsequently in March 2025. As a result of the previous review in FY2024, Travel Department was given a set of recommended actions to undertake in order to reach a target score. The chart below outlines the previous assessment scores and FYE December 2024 targets set in March 2024. Details of the actions taken to reach/exceed the targets are detailed further in this report under each corresponding area.

Summary of ESG Performance	Previous Assessment Score in March 2024	Target score for December 2024	Assessment in March 2025	Target Score FYE December 2025
Environmental	32%	54%	57%	68%
Social	58%	67%	74%	79%
Supply chain	39%	54%	50%	57%
Governance	43%	59%	64%	74%
ESG Integration	46%	55%	56%	67%
Total Score	45%	59%	62%	71%



HIGH-LEVEL SUMMARY OF ACTIONS TAKEN TO ACHIEVE ASSESSMENT SCORES IN MARCH 2025

Within the **Environment** section, Travel Department has undertaken various activities to reach **57%**. The actions undertaken to achieve this included implementing a single-use plastic reduction strategy on all tours, which has saved thousands of water bottles. Furthermore, Travel Department has measured its Scope 1 and 2 emissions, introduced an energy reduction programme within their office and given sustainability training to three senior members of staff. A target of 68% has been set for the Financial Year End (FYE) 2025, and the main actions to complete are undertaking a full carbon emissions calculation, including homeworking emissions and enhancing data quality.

Travel Department achieved a high score of **74%** for its **Social** section of the Review, which was largely due to the jump in DE&I scores and enhanced career development programme. Pay fairness and levels were also improved on as they have completed their first Gender Pay Gap report and ensured all staff are paid the Real Living Wage. Travel Department can work towards a target score of 79% if it were to enhance its parental leave and complete more formal DE&I training.

The **Supply Chain** is another area where they have made solid progress. Travel Department has scored **50%** for the Supply Chain section. Travel Department updated its Supplier Code of Conduct, which now contains a section on ESG. Travel Department continues to audit suppliers and partners thoroughly and has investigated the use of low-carbon travel on packages they operate; however, this has proved tricky, due to locations and vehicles available. To reach a target of 57%, Travel Department are advised to ensure open and transparent communication with suppliers to share business goals, expectations and needs.

In **Governance**, after assessing Travel Department in March 2025 they have scored **64%**, a reflection of the work on the first Gender Pay Gap calculation, as well as implementing the business's first whistleblowing and anti-bribery and corruption (ABC) policies. Furthermore, they drafted a Modern Slavery Statement, although this should be made easier to access on the website. Regular and thorough training for employees is a strength of Travel Department, as is the company's corporate purpose, which is woven into documentation and operations. They have a robust Sustainability Policy, which is easily accessible on the company website. They have also made strides within their ESG Governance by linking the Director of Operations' remuneration to ESG performance and implementing ESG training for senior staff. Actions such as drafting and rolling out a formal Corporate Criminal Offence Policy and annual training on the ABC policy will help bring the company towards its target of 74%. Documenting the Gender Pay Gap results, complete with actions on how they will reduce any gaps, is also recommended.

Travel Department has improved its **ESG Integration** and reached **56%** because of its strong Board engagement in ESG and transparency when publishing the work it does within ESG. They have produced Sustainability Reports since 2022 and have an ESG strategy in place, which they report against annually. To reach the target score of **67%**, the business should further develop its ESG Strategy by aligning with the United Nations Sustainable Development Goals and continue to publicly disclose its ESG performance.

Should Travel Department pursue these recommendations by December 2025, we believe Travel Department will advance to a score of 71% overall.

HIGH-LEVEL SUMMARY OF KEY COMPETITORS

Newmarket Holidays has implemented several sustainability and Environmental, Social, and Governance (ESG) initiatives under its "Travel for Good" programme. This initiative reflects the company's commitment to responsible travel and encompasses various projects and partnerships aimed at reducing environmental impact and supporting local communities.

To address its carbon footprint, Newmarket Holidays collaborates with environmental consultants SaveMoneyCutCarbon and Media Group to support the World Land Trust, a conservation charity focused on protecting threatened habitats and promoting reforestation. Since 2015, this partnership has resulted in the preservation of over 62,000 square metres of critically threatened tropical forests and the capture of more than 1,500 tonnes of CO₂.

In 2024, they began supporting the North Pennines Area of Outstanding Natural Beauty (AONB) Partnership's peatland restoration programme. For every customer traveling with the company, a donation is made to aid in restoring peatlands, which play a crucial role in carbon sequestration and climate regulation.

They engage in various community-focused projects worldwide. In India, the company has partnered with One Tree Planted, resulting in the planting of 650 trees between April 2022 and March 2023. Additionally, collaborations with organisations like I Village Family support women's empowerment by providing training and employment opportunities in local communities.

In South America, they have partnered with local operators such as South American Tours in Argentina, contributing to associations that promote the well-being of people with disabilities. In Ecuador, partnerships with organisations like Adventure Journeys support women-powered projects aimed at preserving local customs and creating economic opportunities.

Recognising the environmental impact of paper usage, Newmarket Holidays has reduced the amount of paper used for brochure production by 45% since 2019 and aims to decrease this further. The materials used are biodegradable, and any unused brochures are fully recycled, demonstrating the company's commitment to minimizing waste.

The company emphasises responsible travel practices by carefully selecting hotels and on-the-ground suppliers that adhere to ethical standards and comply with international and local laws. Tours are designed to support conservation projects and social programs, with a strong focus on engaging local communities and avoiding activities that exploit animals. Efforts are also made to reduce printed materials and encourage digital documentation to minimise environmental impact.

They have an extensive ESG section on their website, detailing responsible travel tips, how they increasing wellbeing within their offices and a modern slavery statement.

HIGH-LEVEL SUMMARY OF KEY COMPETITORS

Riviera Travel has launched the 'Doing the Right Thing' plan, focusing on sustainability, carbon footprint management, ethical operations, and charitable contributions.

The company has implemented an ethics policy and sustainability checklist covering labour standards, human rights, animal welfare, and renewable energy. All suppliers are required to adhere to these standards.

Working with eCollective, Riviera Travel plans to reduce its guests' carbon footprint by 20% by 2028, measured per customer per night across all holiday categories. Strategies include increasing rail travel options and utilising greener energy sources on their ships. In collaboration with Water-to-Go, Riviera Travel offers customers reusable water bottles with filtration systems to reduce single-use plastic consumption. The company aims to halve its use of paper and plastics by 2025 by enhancing digital brochures, reducing printed materials, and replacing plastic luggage tags with reusable alternatives.

Riviera Travel has partnered with Practical Action, donating £1 per guest booked from 2024. Furthermore, they actively engage in various community initiatives that reflect their commitment to social responsibility and environmental sustainability. Notable examples include:

Waste Management Project in Kisumu, Kenya. In partnership with the charity Practical Action, Riviera Travel has embarked on a two-year project aimed at improving waste management systems in Kisumu, Kenya. The initiative focuses on collaborating with over 2,000 households and 100 waste workers to develop sustainable waste solutions. Objectives include removing 67 tonnes of plastic from the environment, recycling approximately 33 tonnes, and reducing waste hotspots along the Auji River.

'Riviera Races to Kisumu' Fundraiser. To support the Kisumu project, Riviera Travel launched the 'Riviera Races to Kisumu' initiative, a virtual challenge where team members collectively aimed to cover the distance from their head office in Burton on Trent to Kisumu—totalling 6,340 miles—through activities like running, walking, swimming, and cycling. This endeavour not only raised funds but also heightened awareness about waste management challenges in the region.

Support for Working Parents. Demonstrating a commitment to employee well-being and community support, Riviera Travel has partnered with the Association of Women Travel Executives (AWTE) and endorsed the 'Back in Time for Bed' (BITFB) initiative. Founded by Riviera's head of partnerships, Vicky Billing, along with Anna Perrott from Panache Cruises, BITFB serves as a support group offering advice and a forum for discussion to assist parents balancing career and home life. This initiative underscores the company's dedication to fostering a supportive work environment and addressing the challenges faced by working parents.

BRIEF METHODOLOGICAL OVERVIEW

ESG scores from Sustainable Advantage are designed to measure, transparently and objectively, a company's relative ESG performance, commitment, and effectiveness across five areas: environmental, social, supply chain, governance and ESG integration and are based on publicly reported data and extensive direct client engagement.

The findings and recommendations in this report are based on the following interviews with Travel Department during March 2025:

- **Claire Doherty, Director of Operations**

The findings and scores awarded as part of this review were discussed with Claire Doherty at Travel Department

The ESG assessment undertaken by Sustainable Advantage produces a numeric score based on current activities and responses. Each topic has five levels of performance which range from no action, equating to zero points, to best practice, whereby a company is awarded the maximum four points available. Bespoke recommendations and best practice guidance have been provided for each topic to allow Travel Department to create a roadmap for improved ESG performance between this year's ESG Review and FYE December 2025. Aggregated and overall scores have been awarded for performance within the five key ESG themes: Environment, Social, Supply Chain, Governance and ESG Integration.

Please see [Appendix A](#) to assess Travel Department's ESG maturity.



COMPANY OVERVIEW

TRAVEL DEPARTMENT OVERVIEW (OPERATIONS AND SUPPLY CHAIN)

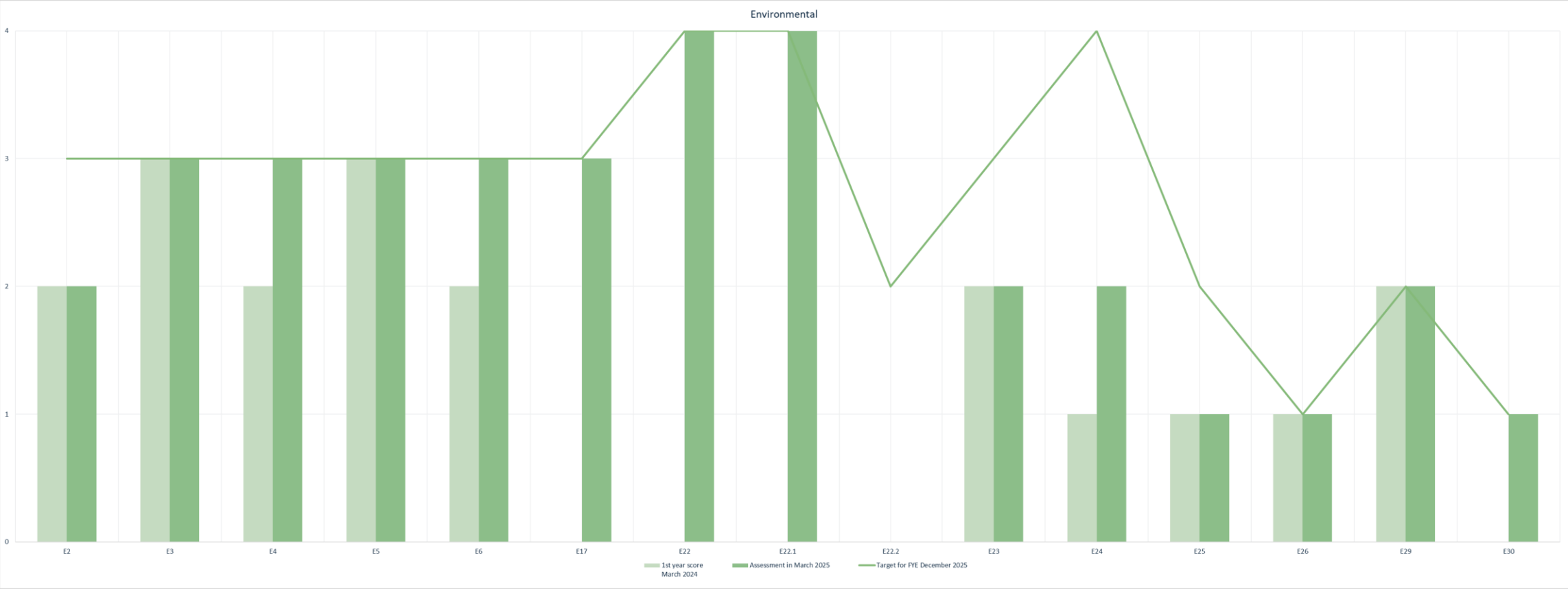
Brief description of the company	Travel Department is a Dublin-based tour operator specialising in guided group holidays and escorted tours. Established in 1996, the company offers a diverse range of travel experiences to over 140 destinations worldwide. They primarily operate in Ireland and the United Kingdom. In recent years, the company has expanded its presence in the UK market, collaborating with travel agents across the country to offer its holiday packages. Departures are available from London, Scotland, Belfast, and Dublin.
Number of Employees	60
Geographic locations	Travel Department offers guided group holidays to over 140 destinations worldwide, spanning various countries across Europe, Asia, Africa, the Americas, and Oceania.
Property sites and responsibility for utilities	They operate from one office in Dublin; waste is fully controlled by the landlord. They are responsible for their energy, which is 100% green electricity.
Overview of supply chain and locations	60-70 major tour suppliers.
Awards, accreditations, and certifications	Winner - Irish Travel Industry Awards 2025 – Sustainability Initiatives

SECTION 01

ENVIRONMENTAL PERFORMANCE

Environmental		Previous Assessment March 2024	Assessment in March 2025	Target for FYE December 2025
E2	Landlord Engagement (not responsible for waste)	2	2	3
E3	Procurement of renewable or low carbon (nuclear) energy	3	3	3
E4	Energy data collection and analysis	2	3	3
E5	Energy consumption reduction	3	3	3
E6	Energy awareness	2	3	3
E17	Single use plastics - products	0	3	3
E22	Staff - mode of transport	0	4	4
E22.1	Employee business travel	0	4	4
E22.2	Homeworking	0	0	2
E.23	Measuring and reporting on climate change risks and opportunities	2	2	3
E24	Carbon emissions calculated	1	2	4
E25	Carbon emissions reduction plan	1	1	2
E26	Carbon offsetting	1	1	1
E29	Environmental governance and policy	2	2	2
E30	Environmental Training	0	1	1
TOTAL SCORE		32%	57%	68%

Note: The topics above were selected from an extensive list of Environmental issues based on relevance and materiality to Travel Department as an organisation.





GOVERNANCE, POLICIES AND POLLUTION MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- The Product Director has formal assignment of day-to-day responsibility for environmental management as part of the core role and responsibilities.
- Travel Department have a sustainability policy in place, within this policy sits an environmental section outlining the organisation’s commitments and goals.
- This policy is updated annually, is communicated to all staff, and also sits externally on the company website.
- 3 senior members of management have completed an ESG training course hosted by the ITAA (Irish Travel Agents Association).

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
E29	Environmental governance and policy	2	Formal assignment of day-to-day responsibility for environmental management as part of core role and responsibilities. Policy in place and approved by senior management, communicated to employees with a formal process in place to review and update the policy (at least annually)	2	Formal assignment of day-to-day responsibility for environmental management as part of core role and responsibilities. Policy in place and approved by senior management, communicated to employees with a formal process in place to review and update the policy (at least annually)
E30	Environmental Training	1	Limited coverage of environmental issues / company environmental commitments in employee training	1	Limited coverage of environmental issues / company environmental commitments in employee training



ENERGY MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department have one office, located in Dublin. They procure 100% renewable energy for this location.
- Energy data is collected and reviewed monthly. This data is checked for monthly anomalies and scrutinised to ensure energy-saving initiatives are reducing overall use.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
E3	Procurement of renewable or low carbon (nuclear) energy	3	100% of sites on are on green electricity tariffs	3	100% of sites on are on green electricity tariffs
E4	Energy data collection and analysis	3	Energy consumption data reviewed monthly with interrogation of performance e.g., data analysis, league tables, heat maps etc.	3	Energy consumption data reviewed monthly with interrogation of performance e.g., data analysis, league tables, heat maps etc.



ENERGY MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND JANUARY 2025

- An energy reduction strategy has been implemented, having changed all lights to LED and installing motion sensors across the office.
- The Project Director has taken on the role of energy champion across the business.
- There are regular communications sent to staff regarding how they can lower the company's energy use. These are centred around the use of kitchen facilities.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
E5	Energy consumption reduction	3	An energy reduction strategy is in place covering all sources of consumption with budget approved by board. Energy reduction targets have been set with base period and target achievement dates both defined	3	An energy reduction strategy is in place covering all sources of consumption with budget approved by board. Energy reduction targets have been set with base period and target achievement dates both defined
E6	Energy awareness	3	Green Champion appointed. Regular communication to employees on how they can reduce the company's energy usage and some initiatives in place	3	Green Champion appointed. Regular communication to employees on how they can reduce the company's energy usage and some initiatives in place



WASTE MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- The building management team in the building where they operate disposes of all waste.
- The office has a recycling system in place with three waste streams being segregated (dry mixed recycling, glass, and general waste).
- They have introduced further recycling with bottles, which can now be returned for cash, and this cash is being put towards our chosen Irish charity in 2025.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Engage with your landlord to enquire as to whether they operate a zero waste to landfill policy. If not, encourage them to change waste disposal provider

TOPICS		Assessment in March 2025		Target for FYE December 2025	
E2	Landlord Engagement (not responsible for waste)	2	Proactive engagement with landlord on waste reduction initiatives e.g., requested recycling station set-up and requested landfill reduction policy	3	Landlord has implemented waste reduction initiatives and implemented zero waste to landfill approach



TRANSPORT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- A Travel survey has been conducted, where it was confirmed that 90% of staff commute to the office via public transport. A cycle to work scheme is in place, and scope 3 data is being collected.
- All business travel is tracked, with scope 3 data collection taking place.
- Homeworking emissions are not currently tracked.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Implement a process to collect employee homeworking data (e.g., via survey) or ad hoc data request. This information should include understanding how many days per week homeworking takes place and whether energy contracts are renewable.
- Collect this employee's homeworking data on an annual basis in order to calculate scope 3 emissions.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
E22	Staff - mode of transport	4	Employee commuter emissions data collected and regularly monitored. More than 50% of staff commute using public transport, bicycle, walk or own an EV	4	Employee commuter emissions data collected and regularly monitored. More than 50% of staff commute using public transport, bicycle, walk or own an EV
E22.1	Employee business travel	4	Business travel data is regularly collected, and Scope 3 emissions are regularly monitored	4	Business travel data is regularly collected, and Scope 3 emissions are regularly monitored
E22.2	Homeworking	0	No employee homeworking data collected or monitored	2	Process currently in place to collect employee homeworking data (e.g., via survey) or ad hoc data request



GREEN HOUSE GAS (GHG) EMISSIONS

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Scope 1 & 2 and partial scope 3 emissions have been calculated with plans to gather additional wider scope 3 data in the coming year.
- Carbon reduction plan currently being worked on as part of a wider carbon footprint. Planned for 2025.
- Travel Department have offset their Scope 1, and 2 emissions based on a carbon emissions survey with credits sourced through project(s) that have been verified in accordance with a recognised voluntary standard.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Proceed with plans to commission a full Net Zero GHG emissions calculation, together with reduction glidepath in 2025

TOPICS		Assessment in March 2025		Target for FYE December 2025	
E24	Carbon emissions calculated	2	Complete SECR format disclosure (Scope 1 and 2 and employee mileage reclaim)	4	Carbon emissions calculated for Scope 1 and 2 and all material Scope 3 emissions categories, in line with GHG Protocol
E25	Carbon emissions reduction plan	1	Company documents the breakdown of emissions source for each scope and category i.e. waste streams, electricity renewable / brown	2	Carbon reduction plan in place
E26	Carbon offsetting	1	Carbon neutral (Scope 1 & 2) with credits sourced through project(s) that have been verified in accordance with a recognised voluntary standard e.g., Verra	1	Carbon neutral (Scope 1 & 2) with credits sourced through project(s) that have been verified in accordance with a recognised voluntary standard e.g., Verra



CLIMATE RISK AND OPPORTUNITY AND TCFD

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department have no specific climate strategy in place. However, they avoid all seasons and areas of intense/ volatile weather.
- They don't conduct tours during any wet season and don't plan any tours around peak times. All departure and tour dates are set, they don't offer their customers customisable departures.
- Longer term, they seek advice on climate patterns and will plan packages and tours accordingly.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Proceed with the Climate Risk Assessment planned for 2025. This assessment should cover all company operations, including the company's supply chain. Assess these risks across current and future climate conditions. Use the assessment to identify the potential impact of climate change across your organisation and develop a company strategy to address these risks and put appropriate mitigating actions in place. Within this assessment consider the financial impact of the identified risks.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
E23	Measuring and reporting on climate change risks and opportunities	2	Considers and reports on some risks and opportunities from climate change and has developed a climate strategy to mitigate risks and capitalise on opportunities	3	Thorough understanding of risks and opportunities from climate change and has developed a robust climate strategy to mitigate risks and capitalise on opportunities, underpinned by ambitious targets and is regularly reviewed and updated by management

SECTION 02

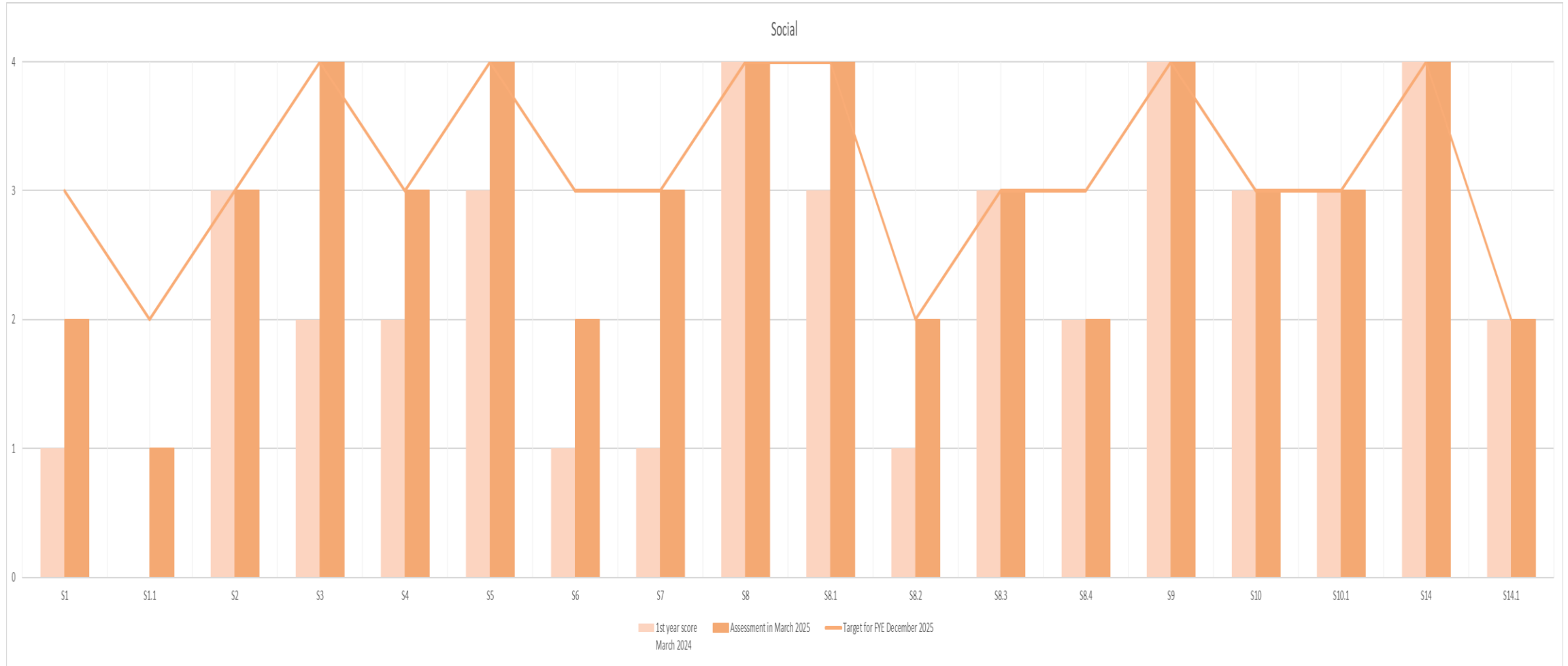
SOCIAL PERFORMANCE

Social		Previous Assessment March 2024	Assessment in March 2025	Target for FYE December 2025
S1	Diversity, Equity and Inclusion - Strategy	1	2	3
S1.1	Diversity, Equity and Inclusion - Practice	0	1	2
G8	Board / Senior leadership diversity	2	2	3
S2	Developing Line Managers	2	3	3
S3	Skills and Career Development	2	4	4
S4	Health and wellbeing	2	3	3
S5	Employee engagement	3	4	4
S6	Pay Fairness	1	2	3
S7	Pay levels	1	3	3
S8	Grievances procedures	4	4	4
S8.1	Employee turnover	3	4	4

Note: The topics above were selected from an extensive list of Social issues based on relevance and materiality to Travel Department as an organisation.

S8.2	Employee absenteeism	1	2	2
S8.3	Company ways of working (flexible / hybrid-working policy)	3	3	3
S8.4	Company ways of working (approach to parental leave)	2	2	3
S9	Strategic HR function	4	4	4
S10	Health & Safety (Policy & data)	3	3	3
S10.1	Health & Safety (Implementation)	3	3	3
S14	Customer engagement and satisfaction)	4	4	4
S14.1	Influencing customer behaviour	2	2	2
S15	Community engagement	2	3	3
TOTAL SCORE		58%	74%	79%

Note: The topics above were selected from an extensive list of Social issues based on relevance and materiality to Travel Department as an organisation.





DIVERSITY EQUITY AND INCLUSION

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- DE&I policy is in place and metrics collected have expanded to include sex, age and background/race of all employees, which can be seen in the Pay Gap Reporting.
- Due to the size of the organisation, there is no DE&I Council (or similar) in place.
- DEI initiatives implemented, such as awareness in e-mails to celebrate the national days of the different nationalities and will be hosting a cultural day every year in the office.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Undertake a review of employee demographic data to determine if there are any trends, apparent biases, imbalances, missed opportunities or gaps in the data when it comes to employee intake, voluntary vs involuntary departures, etc.
- Use demographic data to formalise DE&I strategy and publish this document signed by senior leadership, and share the document with all relevant stakeholders.
- Set DE&I targets/KPIs across the business, e.g. gender representation, Board/Executive diversity, workforce ethnicity, diversity of recruitment.
- Consider how the company's recruitment practices can encourage DE&I, such as inclusive job descriptions, and working with minority candidate agencies.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S1	Diversity, Equity and Inclusion - Strategy	2	DE&I council established. Data for multiple protected characteristics has been collected (e.g., gender, ethnicity, disability, sexual orientation) and analysed	3	Diversity, Equity & Inclusion strategy / roadmap has been rolled out focusing on the most important DE&I issues to the business
S1.1	Diversity, Equity and Inclusion - Practice	1	The company has gained a good understanding of DE&I related issues in the company, for example through employee surveys or in-depth interviews. A variety of DE&I engagement initiatives have been implemented (e.g., DE&I awareness weeks/events, webinars, accessibility requirements considered e.g., physical and tools - websites)	2	Recruitment process considers / addresses D&I with specific actions implemented, such as actively casting a net beyond traditional recruiting pipelines, working with minority candidate agencies, amending job description wording, etc.). Recruiters or hiring managers have undergone unconscious bias training



LEARNING AND DEVELOPMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Management training is given when required or requested.
- Travel Department identifies employees with management potential and works with them to create career development plans.
- All staff have 1on1 meetings and appraisal processes where there is a two-way dialogue on career progression, training opportunities and performance. All staff have now got KPI's included in their annual review, and these are being checked on a quarterly basis by their managers. Management discusses gaps in training or potential for upskilling, specifically in their overall annual reviews, but these can also be requested at any time.
- Due to the size of the organisation, there is no formal career development framework in place.
- Annual reviews, appraisals, training budget, and external and internal training are in place for all teams.
- The majority of training conducted is team-specific, for example, sales team generic training.
- Tracking and logging all staff training and Travel Department reimburse certain training courses and degrees for its employees.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S2	Developing Line Managers	3	High potential employees have been formally identified, and some level of skills assessment takes place providing insight for training needs in preparation for potential career progression pathways	3	High potential employees have been formally identified, and some level of skills assessment takes place providing insight for training needs in preparation for potential career progression pathways
S3	Skills and Career development	4	Training and development programme in place based on a formal skills assessment of all employees; specific training needs identified and annual review and refresh of all skills to ensure continued training and development. Reimbursements / funding provided for continuing education (e.g., college degrees, professional qualifications)	4	Training and development programme in place based on a formal skills assessment of all employees; specific training needs identified and annual review and refresh of all skills to ensure continued training and development. Reimbursements / funding provided for continuing education (e.g., college degrees, professional qualifications)



HEALTH AND WELLBEING

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Wellbeing policy is in place.
- Health and Wellbeing budget is in place
- EAP in place through Laya Healthcare and the Travel Department host workshops with partners, such as a Nutrition workshop for staff.
- Questions on health and wellbeing and stress levels are included in the annual employee engagement survey.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for this topic as the target score has been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025
S4	Health and wellbeing	3	Formal health and wellbeing programme in place with a range of initiatives covering physical, financial and psychological wellbeing (as above), supported by H&W champions or mentors within the company. Selected aspects of programme also offered to employee families	3 Formal health and wellbeing programme in place with a range of initiatives covering physical, financial and psychological wellbeing (as above), supported by H&W champions or mentors within the company. Selected aspects of programme also offered to employee families



EMPLOYEE ENGAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- There is an annual survey in place, which is completed through a third-party platform, CulturAmp. CulturAmp allow Travel Department to compare and benchmark against other similar-sized companies.
- Travel Department uses staff surveys to develop action plans, adjust strategy and implement positive change. The main change implemented from the last staff survey was improving internal communications within the company; to this end, they have created a company intranet.
- All results from staff surveys are communicated to staff and escalated for review at the senior management/board level.
- There are weekly management meetings, fortnightly company newsletters and monthly gatherings to keep staff abreast of company developments.
- 52 respondents out of a possible 62, which was an 84% response rate vs 82% in 2023.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S5	Employee engagement	4	Well established employee engagement process in place with annual engagement surveys and/or regular pulse surveys, with results reported to senior management. Demonstrated positive impact of initiatives implemented in response to engagement results	4	Well established employee engagement process in place with annual engagement surveys and/or regular pulse surveys, with results reported to senior management. Demonstrated positive impact of initiatives implemented in response to engagement results



PAY

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- A Gender Pay Gap Report has been completed even though it is not required from a regulatory perspective, but to date no analysis has been completed on the data.
- All employees are paid the Real Living Wage or above

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Analyse the causes of any identified gaps within the GPG report and identify actions to close existing gaps.
- Take any relevant action to address gaps or issues and ensure ongoing annual monitoring/reassessment are in place.
- Establish a pay structure or framework to enable structural change. Assess against external benchmarks, e.g. industry average, and review regularly.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S6	Pay fairness	2	Pay fairness assessed (e.g., internal equal pay assessment, benchmarking pay and benefits versus peers / external sources). No actions taken in response	3	Pay fairness assessed; actions have been taken to address any gaps or issues and ongoing annual monitoring / reassessment is in place. A pay structure or framework is in place with some evidence of periodic review and assessment against benchmarks
S7	Pay levels	3	All employees paid (at least) the Real living wage and process in place to ensure continued payment of the living wage	3	All employees paid (at least) the Real living wage and process in place to ensure continued payment of the living wage



GRIEVANCES

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- There is a Grievance Policy and procedure in place, this is communicated to all employees. All formal grievances are reported to the board; there have been no grievances in the past three years.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for this topic as the target score has been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S8	Grievances procedures	4	Formal grievance policy and procedure in place. All grievances reviewed by senior management and demonstrated significant performance improvement based on implemented actions (or no grievances raised in last 3 years)	4	Formal grievance policy and procedure in place. All grievances reviewed by senior management and demonstrated significant performance improvement based on implemented actions (or no grievances raised in last 3 years)



EMPLOYEE TURNOVER AND ABSENTEEISM

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Employee turnover is monitored monthly and reported to the Board. It has reduced year-on-year since the strain the pandemic put on the travel industry.
- Absenteeism is monitored regularly and reported to the Board.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S8.1	Employee turnover	4	Employee turnover is collected and monitored at least quarterly (and is reviewed by senior management). Positive impact of actions introduced to reduce turnover already evident (if required)	4	Employee turnover is collected and monitored at least quarterly (and is reviewed by senior management). Positive impact of actions introduced to reduce turnover already evident (if required)
S8.2	Employee absenteeism	2	Employee absenteeism is collected and monitored regularly (e.g., quarterly) with some actions for improvement implemented	2	Employee absenteeism is collected and monitored regularly (e.g., quarterly) with some actions for improvement implemented



COMPANY WAYS OF WORKING

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- There is a flexible working policy in place, available to all staff. Staff generally work two days from the office, with three days remote. Staff are also offered flexible working hours.
- However, call centre staff work on a rolling roster and therefore their flexibility is slightly limited.
- Statutory parental leave is offered to staff; however, additional policies such as adoption are in place

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S8.3	Company ways of working (flexible / hybrid-working policy)	3	Homeworking / flexible / hybrid working policy in place and applies to all employees (with limited/no approval required) with positive uptake from employees	3	Homeworking / flexible / hybrid working policy in place and applies to all employees (with limited/no approval required) with positive uptake from employees
S8.4	Company ways of working (approach to parental leave)	2	Enhanced parental leave in place (i.e. additional paid time off above and beyond statutory). Additional policy implemented in another area (e.g., adoption leave)	3	Enhanced / shared parental leave in place, and level of pay/period of time off is at or above peers / market practice. Additional policy implemented in another area (e.g., adoption leave)



STRATEGIC HR FUNCTION

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- The HR manager handles the day-to-day HR administration, but responsibility for policies etc. sits with the executive directors.
- For more complex HR matters, Travel Department take advice from a third-party.
- Benefits are limited but include significant flexible working (including flexitime, hybrid working, ability to work from abroad for up to 6 weeks per year etc,) regular places on familiarisation trips (with prioritisation given to sales and product teams for whom there is important business benefit,) some discounts for personal travel.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for this topic as the target score has been achieved for this period.

TOPICS		Assessment in March 2025	Target for FYE December 2025
S9	Strategic HR function	4 Company can demonstrate it has a culture focused on diversity, inclusion, equity, employee wellbeing, employee engagement and career development. HR can evidence that employees feel a sense of belonging and are committed to helping the company achieve its business goals	4 Company can demonstrate it has a culture focused on diversity, inclusion, equity, employee wellbeing, employee engagement and career development. HR can evidence that employees feel a sense of belonging and are committed to helping the company achieve its business goals



HEALTH AND SAFETY

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department have two Health & Safety policies in place: one internally for their office, and one externally for all tours and trips.
- There have been 0 incidents or near misses in the office.
- All external data for accidents, incidents and near misses are collected.
- Senior management team and an external solicitor meet every two months to review everything. Illness, accident, near-misses, and any H&S issues for the future.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S10	Health & Safety (Policy & data)	3	Functional policy in place; data collection is formalised; risk assessment performed on job functions and/or work areas and built into risk register; Directors identify targets e.g., focus on near miss reporting	3	Functional policy in place; data collection is formalised; risk assessment performed on job functions and/or work areas and built into risk register; Directors identify targets e.g., focus on near miss reporting
S10.1	Health & Safety (Implementation)	3	H&S management system or framework in place. Designated resource with responsibility and accountability for H&S (e.g., KPIs for meeting targets); H&S training is customised according to job role as required. H&S briefing / communications to visitors / contractors. H&S champions / council / committee appointed with responsibility for identifying opportunities for improvement	3	H&S management system or framework in place. Designated resource with responsibility and accountability for H&S (e.g., KPIs for meeting targets); H&S training is customised according to job role as required. H&S briefing / communications to visitors / contractors. H&S champions / council / committee appointed with responsibility for identifying opportunities for improvement



CUSTOMER ENGAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department have a customer satisfaction and complaints policy in place, this is reviewed annually.
- There are KPIs in place regarding customer satisfaction.
- They send out customer surveys both pre and post trip, and work on any area that falls below their KPI.
- There is a formal complaints procedure in place, which is tracked by senior management. Travel Department has a strong ESG section on its website, outlining what the company does in relation to ESG and company goals. They also offer all customers the opportunity to offset the carbon of their trips.
- Furthermore, Travel Department strives to work with ethical and responsible partners and has an extensive section on animal welfare and policy on its website. They discourage customers from partaking in any activities that exploit wild or domestic animals.
- Overall, they endeavour to educate all customers on responsible and ethical behaviours whilst on one of their holiday packages.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period

TOPICS		Assessment in March 2025		Target for FYE December 2025	
S14	Customer engagement and satisfaction	4	Policy / statement in place, approved by member of senior management and published externally. Formal process in place to review and update (i.e. annually) Formal system/approach to engage to secure customer feedback or satisfaction with regular, proactive customer engagement. Formal process in place to respond to and track complaints. Demonstrated positive performance as a result of engagement activities / ratings in online tools, both in terms of satisfaction level and number / type of complaints	4	Policy / statement in place, approved by member of senior management and published externally. Formal process in place to review and update (i.e. annually) Formal system/approach to engage to secure customer feedback or satisfaction with regular, proactive customer engagement. Formal process in place to respond to and track complaints. Demonstrated positive performance as a result of engagement activities / ratings in online tools, both in terms of satisfaction level and number / type of complaints
S14.1	Influencing customer behaviour	2	Basic customer communications in place to help educate them on responsible behaviours (e.g., posters, signs, customer charter etc.)	2	Basic customer communications in place to help educate them on responsible behaviours (e.g., posters, signs, customer charter etc.)



COMMUNITIES

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department work with local communities, including hoteliers, bus companies and local guides.
- The company also supports a local charity (chosen by employees). The current charity is Alone, an Irish charity that works to enable older people to age with dignity in their own homes. The designated charity changes every 3 years. Staff have the opportunity to volunteer throughout the year through specific company volunteer initiatives.
- They have partnered with CloudForests, i.e., planting trees, to help grow biodiversity in Ireland by contributing towards their efforts in growing forests in Ireland.
- In addition to this, Travel Department are now working with a local community charity in South Africa (kariegafoundation.co.za).

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

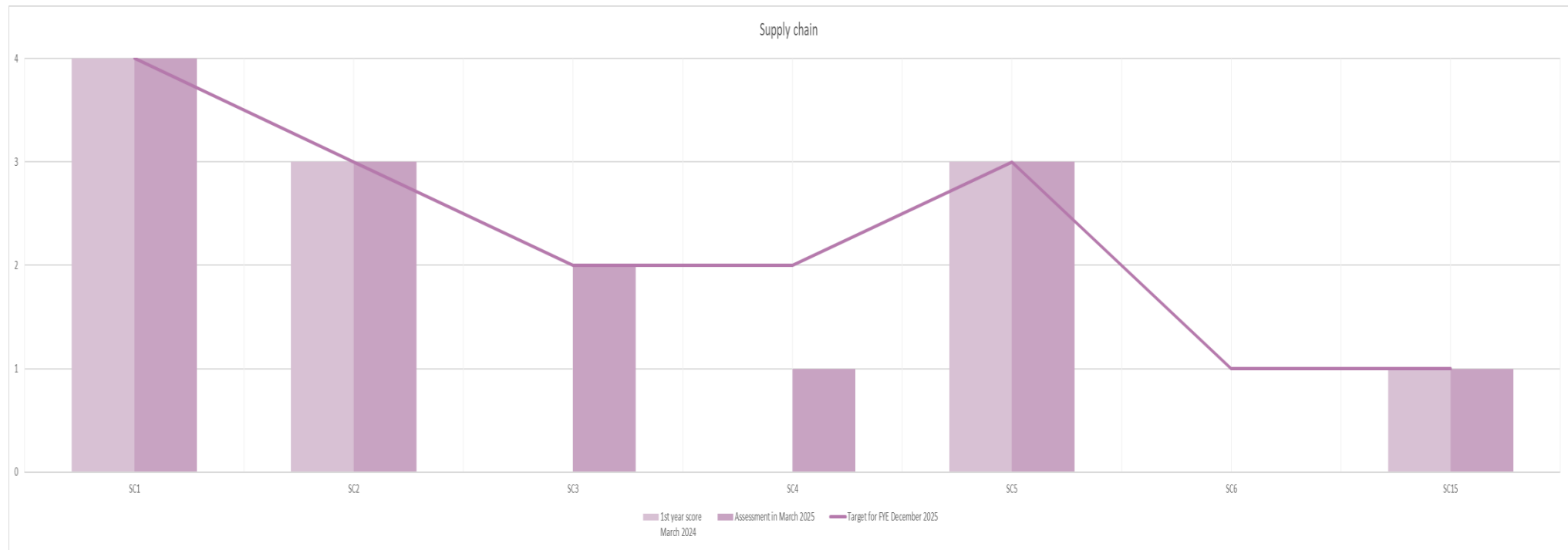
TOPICS		Assessment in March 2025	Target for FYE December 2025
S15	Community engagement	3 Formal (long-term, i.e. +3yrs) community engagement programme implemented in partnership with community partner. No formal Employee volunteering policy, or partnerships, mostly ad hoc interest from employees. Engagement activities and/or donations are related/aligned to company sector / values. Community Engagement strategy is considered but not formally implemented	3 Formal (long-term, i.e. +3yrs) community engagement programme implemented in partnership with community partner. No formal Employee volunteering policy, or partnerships, mostly ad hoc interest from employees. Engagement activities and/or donations are related/aligned to company sector / values. Community Engagement strategy is considered but not formally implemented

SECTION 03

SUPPLY CHAIN PERFORMANCE

Supply Chain		Previous Assessment March 2024	Assessment in March 2025	Target for FYE December 2025
SC1	Supplier Code of Conduct	4	4	4
SC2	Responsible sourcing policy	3	3	3
SC3	New supplier assessment	0	2	2
SC4	Supplier monitoring and collaboration with existing supply chain	0	1	2
SC5	Supplier auditing	3	3	3
SC6	Supply Chain Traceability (Tier 1, 2 & 3)	0	0	1
SC15	Supply chain transport / logistics	1	1	1
TOTAL SCORE		39%	50%	57%

Note: The topics above were selected from an extensive list of Supply chain issues based on relevance and materiality to Travel Department as an organisation.





RESPONSIBLE SOURCING POLICY AND SUPPLIER CODE OF CONDUCT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Supplier Code of Conduct (CoC) in place and approved by senior management, communicated to all suppliers regularly with a formal process in place to review and update the CoC (at least annually). Top 90% of suppliers by spend have approved, signed off and agreed to align with CoC. This was most recently updated in 2024.
- Responsible Sourcing policy in place with procurement team fully trained.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
SC1	Supplier monitoring and collaboration with existing supply chain	4	CoC in place and approved by senior management, communicated to all suppliers regularly with a formal process in place to review and update the CoC (at least annually). Top 90% of suppliers by spend have approved, signed off and agreed to align with CoC	4	CoC in place and approved by senior management, communicated to all suppliers regularly with a formal process in place to review and update the CoC (at least annually). Top 90% of suppliers by spend have approved, signed off and agreed to align with CoC
SC2	Responsible Sourcing policy	3	Responsible Sourcing policy communicated to procurement team with 100% of procurement team trained on policy	3	Responsible Sourcing policy communicated to procurement team with 100% of procurement team trained on policy



SUPPLY CHAIN MAPPING AND ESG PERFORMANCE IMPROVEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- New suppliers are assessed across a range of fundamental ESG criteria.
- The Supplier Code of Conduct has been updated to include key ESG guidance for suppliers. Suppliers and partners must be committed to the humane and ethical treatment of all animals, recognise their responsibility to ensure the safety and well-being of children, leave no trace (waste), adhere to international standards of employment equality, must show a commitment to support and uplift the communities in which they operate, operate in a manner that respects human rights and is compliant with anti-slavery and human trafficking laws and must seek to reduce their carbon footprint and promote environmentally sustainable practices.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Once supplier assessments have been made, suppliers should be prioritised. Lower-performance suppliers should be considered first and potentially re-assessed within 3-6 months; medium-performance/risk suppliers should be reviewed annually. Monitoring should cover all aspects of ESG, and critically, those that are most material to the company, industry or sector.
- Communication: Ensure open and transparent communication with suppliers to share business goals, expectations and needs.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
SC3	New supplier assessment	2	Fundamental ESG criteria requested e.g., questionnaire requesting policies, accreditations (ISOs) and Modern slavery / Human rights considerations	2	Fundamental ESG criteria requested e.g., questionnaire requesting policies, accreditations (ISOs) and Modern slavery / Human rights considerations
SC4	Supplier monitoring and collaboration with existing supply chain	1	Supplier ESG performance monitored	2	Supplier ESG performance monitored and working to establish collaborative processes with suppliers to achieve sustainability objectives



SUPPLY CHAIN MAPPING AND ESG PERFORMANCE IMPROVEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- All suppliers are audited in a Health & Safety capacity which includes checking that they have adequate public liability insurance. Conducted by a third party.
- Whilst Travel Department understandably has excellent oversight of its Tier 1 suppliers, it has no knowledge of ESG credentials or performance

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- In terms of gathering ESG credentials from Tier 1 suppliers, you may wish to explore the following thematic areas:
- **Environmental** - Carbon footprint: reporting on greenhouse gas emissions, including scope 1, 2 and 3; Initiatives to reduce carbon footprint including energy efficiency measures and renewable energy usage and resource management: Sustainable sourcing of materials and resources as well as positive waste management practices including recycling and reduction of single-use plastic. Potentially ISO9001 or ISO14001 in place.
- **Social** – Fair labour practices including fair wages, safe working conditions and no child or forced labour; Diversity and Inclusion policies. Community engagement programmes that support local communities and contribute to social development and transparent reporting on social impact initiatives
- **Governance** – Strong anti-bribery and corruption and anti-bribery policies; transparent governance structures and accountability mechanisms; strong compliance e.g. adherence to international and local regulations and standards with regular audits and assessments

TOPICS		Assessment in March 2025		Target for FYE December 2025	
SC5	Supplier auditing	3	Supplier auditing programme in place (e.g., SA 8000, FLA, SMETA) which could be risk based, focused on geography, type of goods supplied, volume of goods supplied, or total spend	3	Supplier auditing programme in place (e.g., SA 8000, FLA, SMETA) which could be risk based, focused on geography, type of goods supplied, volume of goods supplied, or total spend
SC6	Supply Chain Traceability (Tier 1, 2 & 3)	0	Internal traceability of direct (or Tier 1) suppliers, with no knowledge of ESG credentials	1	Internal traceability of direct (Tier 1) suppliers, with evidence of ESG credentials



TRANSPORT AND LOGISTICS IN SUPPLY CHAIN

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department have investigated the use of e-powered coaches in the locations in which they operate. Options are limited.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for this topic as the target score has been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
SC15	Supply chain transport / logistics	1	Investigating possibility of lower-impact alternatives (e.g., avoiding air freight, moving to low carbon vehicles)	1	Investigating possibility of lower-impact alternatives (e.g., avoiding air freight, moving to low carbon vehicles)

SECTION 04

GOVERNANCE PERFORMANCE

Governance		Previous Assessment March 2024	Assessment in March 2025	Target for FYE December 2025
G1	Policy Review Management	4	4	4
G2	Policies readily accessible	4	4	4
G3	Training on policies	4	4	4
G4	Anti bribery and corruption policy	0	2	3
G4.2	Corporate purpose	3	3	3
G4.3	Conflicts policy and procedures	2	2	3
G4.4	Digital ethics and responsibility	2	2	3
G5	Corporate Criminal Offence policy	0	0	2
G8	Board / Senior leadership diversity	2	2	3
G9	Employee Code of Conduct	3	3	3

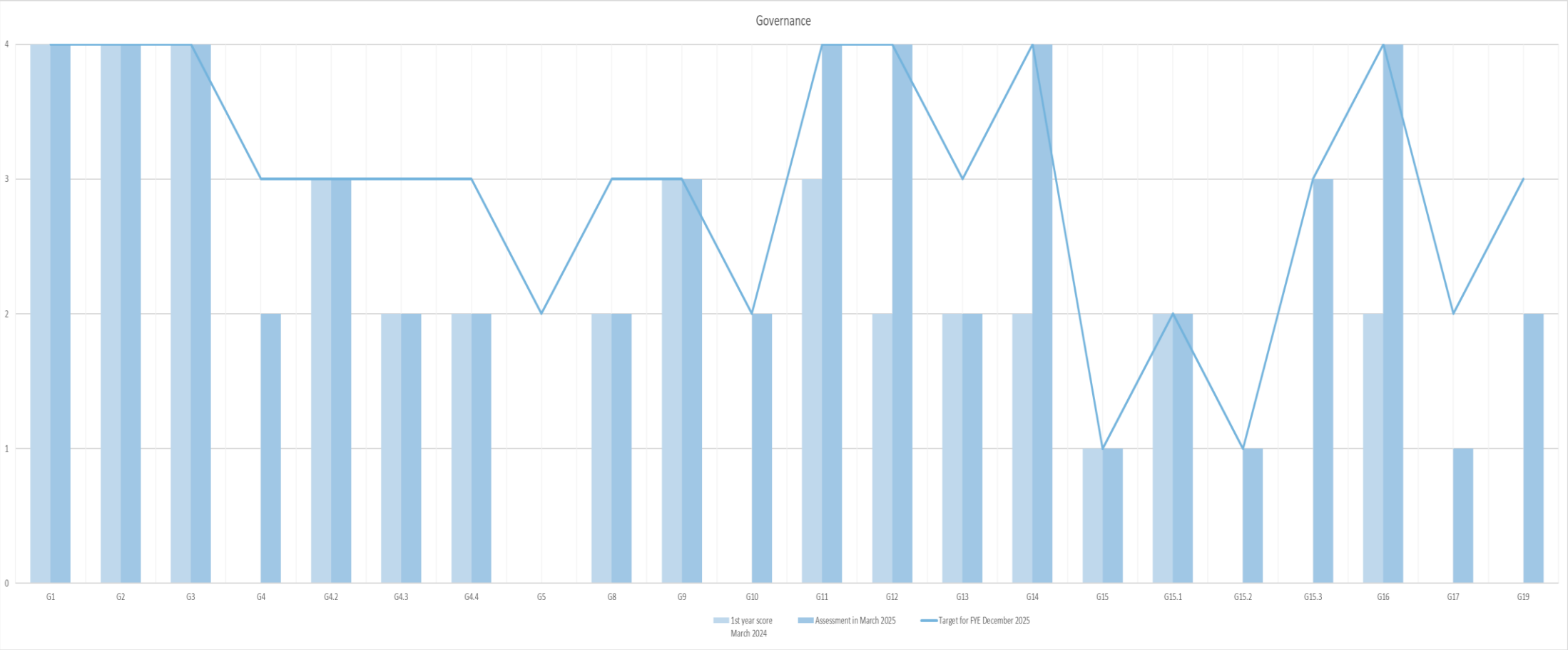
Note: The topics above were selected from an extensive list of Governance issues based on relevance and materiality to Travel Department as an organisation.

SECTION 04

GOVERNANCE PERFORMANCE

Governance		Previous Assessment March 2024	Assessment in March 2025	Target for FYE December 2025
G10	Whistleblowing policy and procedure	0	2	2
G11	GDPR / data privacy policy	3	4	4
G12	Cyber security programme	2	4	4
G13	ESG Risk management and monitoring	2	2	3
G14	Business Continuity	2	4	4
G15	ESG management	1	1	1
G15.1	Budget for ESG	2	2	2
G15.2	ESG training	0	1	1
G15.3	Remuneration and ESG	0	3	3
G16	ESG policy / statement	2	4	4
G17	Gender Pay Gap	0	1	2
G19	Modern Slavery Statement	0	2	3
TOTAL SCORE		43%	64%	74%

Note: The topics above were selected from an extensive list of Governance issues based on relevance and materiality to Travel Department as an organisation.





POLICY MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- All policies are available in the staff handbook and on the company intranet. These are all reviewed annually via a third party to ensure compliance.
- Alerts are sent whenever policies are updated, and training takes place when certain policies are updated.
- There is also training on all policies during induction.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G1	Policy review management	4	A clear policy review structure is embedded, identifying policy content owner, the relevant department leader, chief compliance officer oversight, ESG manager (if available) oversight and - for key policies- C-suite signoff. When reviewing a policy, a company needs to ensure that other internal policies and company values as well as external commitments and applicable legislation are reflected. External advisors may be engaged to assist with this process.	4	A clear policy review structure is embedded, identifying policy content owner, the relevant department leader, chief compliance officer oversight, ESG manager (if available) oversight and - for key policies- C-suite signoff. When reviewing a policy, a company needs to ensure that other internal policies and company values as well as external commitments and applicable legislation are reflected. External advisors may be engaged to assist with this process.
G2	Policies readily accessible	4	Employees are encouraged to access the policies and are informed whenever policies are updated	4	Employees are encouraged to access the policies and are informed whenever policies are updated
G3	Training on policies	4	Training conducted whenever foundational policies are updated with significant material amendments	4	Training conducted whenever foundational policies are updated with significant material amendments



BUSINESS ETHICS AND OVERSIGHT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department have mission statements in place: “Great people delivering great holidays every time” and “We want to create a MORE sustainable, responsible travel experience, focusing on protecting the natural environment, preserving local customs and communities and together we will help to ensure a better world for everyone.” More = Memorable, Open, Resourceful, Expert. Both mission statements are available online and within reporting.
- There is an Employee Code of Conduct in place; employees must sign to show they have read and understood. The COC is updated annually, with refresher training. Various other codes of conduct relating to different topics, including harassment, bullying and other misconduct all included in the staff handbook..

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G4.2	Corporate purpose	3	Defined vision / mission / purpose statement published within their annual account and online	3	Defined vision / mission / purpose statement published within their annual account and online
G9	Employee Code of Conduct	3	Employee CoC or codification of employee behavioural expectations in place e.g., within staff handbook or contracts. Refresher training sessions take place, internally communicated when employee CoC is updated. Violations tracked and logged by designated individual / team	3	Employee CoC or codification of employee behavioural expectations in place e.g., within staff handbook or contracts. Refresher training sessions take place, internally communicated when employee CoC is updated. Violations tracked and logged by designated individual / team



RISK MANAGEMENT: POLICIES & PROCEDURES

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department put an Anti-bribery and Corruption Policy in place in 2024.
- Training for all staff will be completed in 2025.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Ensure staff receive annual training on the ABC Policy and introduce a process to monitor and respond to any reported breaches.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G4	Anti bribery and corruption (AB&C) policy and procedures	2	AB&C policy in place with employees specifically trained on AB&C upon joining the company and required to confirm understanding of behaviours / requirements	3	Advanced procedures / controls in place (e.g., refresher training sessions, internal communications when policy is updated, etc.). Process in place to monitor any breaches. Supporting guidance may also be provided to high-risk departments, where applicable



RISK MANAGEMENT: POLICIES & PROCEDURES

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Conflicts procedure in place, along with Policy. Staff receive training during induction.
- There is no specific Corporate Criminal Offence Policy, apart from Directors' Responsibilities Statement, Compliance Policy Statement, and Accounting Policies (including Taxation); Grant Thornton acts as independent tax advisers.
- The finance team also receive training on tax evasion.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Ensure employees receive annual refresher training on the Conflicts policy.
- Develop and implement a Corporate Criminal Offence Policy. This Corporate Criminal Offence Policy should contain:
 - A top-level commitment to prevent tax evasion
 - An assessment of the risk and any control actions that might need to be taken
 - An evaluation of the proportionality of those control actions
 - Education & communication across the organisation regarding this commitment
 - Processes for monitoring and review

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G4.3	Conflicts policy and procedures	2	Conflicts policy in place with employees specifically trained upon joining the company and required to confirm understanding of behaviours / requirements	3	Advanced procedures/controls in place (e.g., refresher training sessions, internal communications when policy is updated, etc.). Process in place to monitor any breaches
G5	Corporate Criminal Offence (CCO) policy (tax evasion)	0	No CCO policy in place	2	CCO policy is in place. Risk assessment has taken place



RISK MANAGEMENT: POLICIES & PROCEDURES

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department has implemented a Whistleblowing Policy in 2024, and training for all fifty employees will be completed in 2025.
- Travel Department deals with many extenuating circumstances annually, ranging from weather events and natural disasters to terror incidents.
- They have a full risk management plan in place now, which includes a business continuity plan. They tested this plan via live exercise in May 2024.
- In 2024, one of its tour operators' buses crashed whilst carrying a group of their customers, and the business continuity plan was put into a live scenario, working smoothly.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G10	Whistleblowing policy and procedure	2	Whistleblowing policy in place. Reporting procedure is managed internally. Employees are trained on policy and procedure. Whistleblowing/Speak up champion/s in place who are trained to act as recipients of concern	2	Whistleblowing policy in place. Reporting procedure is managed internally. Employees are trained on policy and procedure. Whistleblowing/Speak up champion/s in place who are trained to act as recipients of concern
G14	Business continuity	4	Material aspects of BCP / DRP are tested annually via tabletop or live exercise and/or BCP / DRP is externally audited	4	Material aspects of BCP / DRP are tested annually via tabletop or live exercise and/or BCP / DRP is externally audited



COMPLIANCE

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department completed its first Gender Pay Gap report in 2024.
- Travel Department has a Modern Slavery Statement in place, fully compliant with regulations.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Use Gender Pay Gap data to create a more in-depth report, including a narrative and future actions to reduce the gap. Furthermore, publish the GPG report on the company website for transparent disclosure.
- Ensure transparency and accessibility by publishing the Modern Slavery Statement prominently on the company website. Acknowledge challenges and how you are dealing with them and improving.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G17	Gender Pay Gap	1	Compliant with the minimum regulatory requirements; minimum analysis or activity to close gaps. Published on company website	2	Pay gap report publicised on company website within the last financial year with narrative and planned actions set out to address gaps
G19	Modern Slavery Statement and reporting	2	Statement in place (annually updated), fully compliant with regulations; but with opportunity to go beyond compliance in some aspects	3	Statement in place (annually updated) , fully compliant with regulations; going above and beyond requirements in a number of aspects



DATA AND CYBER SECURITY

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- There is a GDPR policy in place, and all staff are trained upon joining, alongside annual refreshers. There is a system in place to track all violations.
- There is a Cybersecurity Policy in place, with all IT and cybersecurity managed by external third-party specialists, NOSTRA.
- Travel Department has implemented cyber insurance in 2024.
- There is a variety of cybersecurity training completed annually by all staff, and cloud shield has been implemented, as well as multifactor authentication.
- Backups are in place for all reservation and personal data. They also have testing around the online reservation system. Microsoft Business Premium licenses have been in place since 2023.
- A Data Protection Policy covering retention and deletion of data is in place, as is a Data Privacy Policy outlining the protection of employee data.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Travel Department is advised to investigate donating old laptops and electrical equipment to local charities such as [Promise It - Rehab Group](#), a corporate donations programme which facilitates companies in the secure donation of IT equipment to schools, charities and community groups. The data is certifiably erased; the equipment is rebuilt with a Microsoft Operating System and passed on. Promise IT not only helps charities, schools and community groups but it also supports the sustainable employment of people with disabilities.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G11	GDPR / Data Privacy policy	4	Policy communicated annually. 100% of employees are trained on the policy annually and have declared adherence by way of signing the document. A system is in place to track violations	4	Policy communicated annually. 100% of employees are trained on the policy annually and have declared adherence by way of signing the document. A system is in place to track violations
G12	Cyber security programme	4	Internal roles defined, incident response plan in place, supplemented by external specialist support. Management and employee cyber security training and workshops take place annually. Cyber security programme extended to external partners. Defined cyber response team who regularly meet, test and review programmes. Cyber risk insurance in place and/or ISO 27001 accredited	4	Internal roles defined, incident response plan in place, supplemented by external specialist support. Management and employee cyber security training and workshops take place annually. Cyber security programme extended to external partners. Defined cyber response team who regularly meet, test and review programmes. Cyber risk insurance in place and/or ISO 27001 accredited
G4.4	Digital ethics and responsibility	2	Some practices implemented to promote digital responsibility (e.g., public statement on intended positive impact, commitment to protecting personal data, implementation of an environmental IT strategy, etc.)	3	Significant practices implemented promote digital responsibility (potentially including programmes to reduce digital poverty, increase skills/access, facilitating consumer demand for environmentally and societally better digital products, etc.)



ESG MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- A risk committee is in place and attended by the Chair of the Board of Directors, CEO, CFO, and Financial Controller; it typically meets once per year.
- There is a Risk Register in place; ESG risks are integrated into the Risk Register including, climate change, health and safety, regulatory compliance and cyber.
- No ISO 31000, ISO 27005 or other formal accreditation.
- No direct third-party services to date; ESG risk monitoring and mitigation only to a limited extent via the Risk Committee and the Risk Register.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- It is recommended that Travel Department include a section on risks related to its supply chain, reducing emissions, workers' rights and modern slavery.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G13	ESG risk management and monitoring	2	Centralised company risk register is in place. A selection of ESG risks are managed e.g., H&S, cyber, climate change, employee turnover etc	3	Centralised company risk register is in place. Comprehensive ESG risks and opportunities are identified and managed e.g., including climate change, reducing emissions, supply chain sustainability, worker rights, D&I, H&S, Regulatory compliance



ESG MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- There isn't an ESG committee, but responsibility for ESG is held by the Executive Directors, led by the Director of Operations.
- There is no formal ESG budget; the extensive ESG programme is included in other overheads.
- 3 senior members of management have completed an ESG training course hosted by the ITAA (Irish Travel Agents Association).

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
G15	ESG management	1	Formalised role to manage ESG, although person in role is not ESG trained / specialist and/or fills the role part time OR multiple non-specialist people oversee ESG for their function in a part-time / side of desk capacity	1	Formalised role to manage ESG, although person in role is not ESG trained / specialist and/or fills the role part time OR multiple non-specialist people oversee ESG for their function in a part-time / side of desk capacity
G15.1	Budget for ESG	2	No specific ESG budget but management has actively supported a number of targeted ESG activities	2	No specific ESG budget but management has actively supported a number of targeted ESG activities
G15.2	ESG training	1	Ad-hoc ESG training provided to selected employees (e.g., new hires with direct ESG involvement)	1	Ad-hoc ESG training provided to selected employees (e.g., new hires with direct ESG involvement)



ESG MANAGEMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department’s Director of Operations is in charge of its ESG programme, and their remuneration is directly linked to the business’s ESG performance and agreed-upon KPIs.
- Travel Department has an ESG Policy in place, which is updated annually and communicated to all stakeholders.
- The policy outlines Travel Department’s commitments and current activities, it features on the company website.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

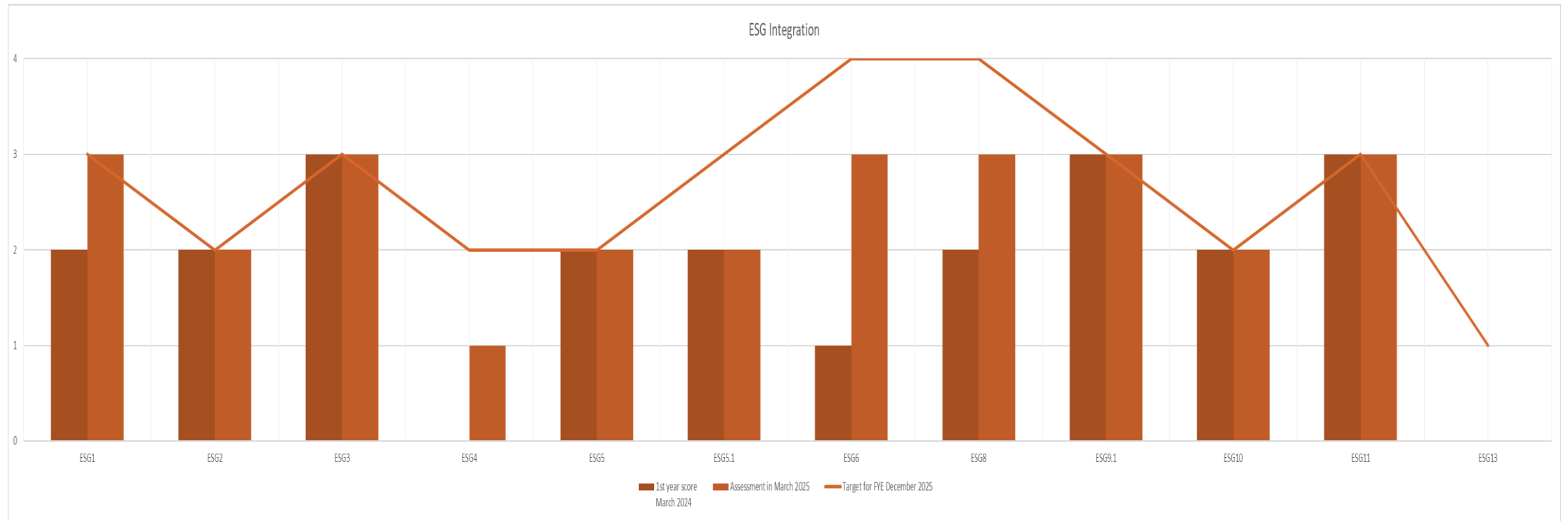
TOPICS		Assessment in March 2025		Target for FYE December 2025	
G15.3	Remuneration and ESG	3	Senior management remuneration has some link to ESG performance	3	Senior management remuneration has some link to ESG performance
G16	ESG policy / statement	4	Policy in place and approved by member of senior management, communicated to employees with a formal process in place to review and update (i.e. annually) OR statement is front and centre on website and core part of company positioning	4	Policy in place and approved by member of senior management, communicated to employees with a formal process in place to review and update (i.e. annually) OR statement is front and centre on website and core part of company positioning

SECTION 05

ESG INTEGRATION PERFORMANCE

Governance		Previous Assessment March 2024	Assessment in March 2025	Target for FYE December 2025
ESG1	Benchmarking of ESG performance	2	3	3
ESG2	ESG data (metrics) independent review and verification	2	2	2
ESG3	Board engagement in ESG programme	3	3	3
ESG4	United Nations Sustainable Development Goals (UNSDGs)	0	1	2
ESG5	ESG data capture (metrics)	2	2	2
ESG5.1	ESG Reporting	2	2	3
ESG6	ESG Strategy, setting goals and reporting progress	1	3	4
ESG8	Providing your ESG information to existing clients	2	2	2
ESG10	Corporate tendering	2	3	3
ESG11	Influencing clients' sustainability performance	3	3	2
ESG13	Green financing	0	0	1
TOTAL SCORE		46%	56%	67%

Note: The topics above were selected from an extensive list of ESG Integration issues based on relevance and materiality to Travel Department as an organisation





BENCHMARKING AND ALIGNMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department is aware of the United Nations Sustainable Development Goals but hasn't implemented any of the goals into their strategy thus far; they plan to incorporate SDGs into the strategy in 2025.
- Travel Department conducts a variety of ESG benchmarking regularly. Sustainable Advantage has completed two ESG Reviews, and separate third parties have measured all carbon emissions and carried out their annual employee engagement surveys.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Travel Department is advised to continue with plans to align their ESG strategy to the SDGs.
- SDG 13 – Climate Action, SDG 12 – Responsible Consumption and Production, SDG 8 – Decent Work and Economic Growth and SDG 14 – Life Below Water would be advisable for travel agencies.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
ESG4	United Nations Sustainable Development Goals (UNSDGs)	1	Aware of SDGs, with plan to assess those most relevant to the company in the future	2	SDGs most relevant to the company have been identified and contribution will be assessed / monitored in the future
ESG1	Benchmarking of ESG performance	3	ESG benchmarking performed on a regular basis (e.g., understanding reporting, strategy, policies of key peers)	3	ESG benchmarking performed on a regular basis (e.g., understanding reporting, strategy, policies of key peers)



BENCHMARKING AND ALIGNMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- There is regular engagement with the majority of key stakeholders regarding Travel Department’s ESG programme.
- Suppliers are engaged at the beginning of the relationship and must sign up to Travel Department’s Supplier Code of Conduct, which contains ESG expectations.
- Travel Department’s ESG strategy and targets are communicated to all staff regularly.
- ESG factors are incorporated into all customer correspondence, and all customers are offered the chance to offset their holiday packages.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
ESG9.1	Client ESG priorities	3	Some clients engaged regularly on ESG with plans to increase engagement with other clients in the future. Outputs used to inform strategy and initiatives	3	Some clients engaged regularly on ESG with plans to increase engagement with other clients in the future. Outputs used to inform strategy and initiatives



ESG MANAGEMENT AND PERFORMANCE

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- ESG is on the agenda at all board meetings. The Director of Operations is in charge of the ESG programme.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for these topics as the target scores have been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
ESG3	Board engagement in ESG programme	3	Formal ESG reporting/monitoring (at least quarterly) to the Board with ESG included in minutes. Senior employee responsibility for ESG assigned and person is actively engaged on ESG agenda	3	Formal ESG reporting/monitoring (at least quarterly) to the Board with ESG included in minutes. Senior employee responsibility for ESG assigned and person is actively engaged on ESG agenda



STRATEGY AND REPORTING

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department has its carbon emissions, energy and employee engagement data independently verified by third parties.
- Comprehensive ESG data is being collected at Travel Department, which includes all energy and carbon data, employee engagement statistics and wider social metrics.
- The Travel Department has an extensive ESG section on its website, which consists of community outreach work, a Sustainability Report, a Sustainability Policy, and the projects they support with carbon offsets.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Travel Department is advised to add its carbon emissions data to the ESG section on its website.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
ESG2	ESG data (metrics) independent review and verification	2	ESG data is reviewed by an independent internal team (e.g., internal audit, compliance, legal, etc) OR ESG data is prepared by an independent third party for multiple areas	2	ESG data is reviewed by an independent internal team (e.g., internal audit, compliance, legal, etc) OR ESG data is prepared by an independent third party for multiple areas
ESG5	ESG data capture (metrics)	2	Comprehensive ESG data being captured. No formal data capture system is in place	2	Comprehensive ESG data being captured. No formal data capture system is in place
ESG5.1	ESG Reporting	2	Selected ESG information is reported externally (i.e. Impact Report or website) but limited explanation / analysis of performance trends	3	Significant range of ESG information reported (i.e. Impact Report or website). Explanation/analysis of performance trends



STRATEGY AND REPORTING

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department has a clear ESG strategy in place, led by the Director of Operations. They have clear KPIs across ESG, which they report against and communicate to all staff and other stakeholders.
- They proactively provide all ESG information on their website, through other marketing materials and via emails and surveys to customers. They have a dedicated ESG section within their website, complete with an annual sustainability report.
- Although most customers don't ask about ESG, Travel Department offers all customers the opportunity to offset their holidays.
- Travel Department strives to work with ethical and responsible partners and has an extensive section on animal welfare and policy on its website. They discourage customers from partaking in any activities that exploit wild or domestic animals.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Use incoming carbon footprint reporting to enhance Travel Department's ESG strategy, ensuring the report features on the Travel Department website.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
ESG6	ESG Strategy, setting goals and reporting progress	3	ESG strategy in place with targets / KPIs defined. Clear ownership and accountability for delivering strategic objectives across the company. Reporting annually on progress against ESG goals	4	Externally facing ESG strategy fully integrated into wider business strategy. ESG is a key strategic priority and a key competitive advantage for the company. Reporting annually against ESG goals
ESG8	Providing your ESG information to existing clients	3	Proactively provide some ESG info to the client (Reports, Metrics, Progress etc)	4	Proactively provide extensive ESG data unasked to the client (Reports, Metrics, Progress, etc)
ESG1 1	Influencing clients' sustainability performance	3	Company sales and marketing teams actively promotes products, services, equipment, materials or initiatives that will enhance a client's sustainability performance	3	Company sales and marketing teams actively promotes products, services, equipment, materials or initiatives that will enhance a client's sustainability performance



ESG SUPPORTING BUSINESS DEVELOPMENT

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- Travel Department is now working directly with other travel agencies to sell their packages. They have not won or lost any tenders based on their current ESG performance.

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- No targets or actions have been set for this topic as the target score has been achieved for this period.

TOPICS		Assessment in March 2025		Target for FYE December 2025	
ESG10	Corporate tendering	2	ESG response/performance has not contributed to losing tenders in the last 2 years. Can provide majority of ESG data requested by client	2	ESG response/performance has not contributed to losing tenders in the last 2 years. Can provide majority of ESG data requested by client



ESG-LINKED FINANCE

ACTIONS TAKEN BETWEEN MARCH 2024 AND DECEMBER 2024

- No new financing since 2018 (although facilities were renewed in 2023); financing through AIB, Bank of Ireland and MML; No specific "green" financing, apart from leveraging the achievements of the specific lenders

RECOMMENDED ACTIONS TO REACH TARGET (DECEMBER 2025)

- Discuss the possibility of green financing and ESG-linked funding with your lenders (banks, Private Equity, etc.)

TOPICS		Assessment in March 2025		Target for FYE December 2025	
ESG1 3	Green financing	0	No green financing used. No consideration of using ESG performance to improve access to (or cost of) capital	1	Green financing options have been explored. Consideration of using ESG performance to improve access to (or cost of) capital (e.g., ESG-linked funding)

APPENDIX

APPENDIX A: ESG review METHODOLOGY

Sustainable Advantage’s ESG Review programme covers 15 material themes and 128 potential individual topics aligning with international ESG scoring and review frameworks including UNSDGs, GRI and SASB.

01

Sustainable Advantage ESG scoring framework

128 material topics across **15** themes



02

We select material topics from our ESG Review framework that reflect the unique characteristics of each company we work with, to create a bespoke ESG performance improvement report. Characteristics considered include:

Sector	Client base and their ESG focus	Compliance requirements
Geographical location/s	Ownership structure	Stage of ESG journey
Business model	Employees	Unique characteristics
Size	Tender requirements	Competitor focus

03

Company ESG Review programme

Company is scored across the material themes and provided with an overall score, as well as a target score, alongside key recommendations to support the achievement of these.

- Company ESG Review programme process:
 - Meet with senior management team to kick off the Review programme.
 - Conduct a high level stakeholder ESG maturity review of the following:
 - Clients
 - Shareholder demands
 - Compliance requirements
 - Competitors
 - Suppliers
 - Employees
- Meet with senior ESG contributors / department heads.
 - For each topic, a score between 0 and 4 is assigned reflecting current ESG performance.
 - Scores are presented in the Summary of ESG Performance table reflecting Environmental, Social, Supply Chain, Governance and ESG Integration elements, each of which are rebased to 100%. The total score is calculated as a percentage of achieved points over the total points available.
 - Set targets for a time period aligned with financial year end.
 - Create an ESG action plan to reach the target scores which is driven by materiality as well as strategic priority.
 - Propose ESG metric set to track the success of the ESG programme.
 - Where appropriate, actions are uploaded to the Sustainable Advantage ESG Performance Tracker platform, with actions allocated for completion by nominated team members, enabling improvement to be monitored in real time.

ESG maturity is based on the total ESG score achieved:



APPENDIX

APPENDIX B: ENVIRONMENTAL

The Sustainable Advantage ESG scoring framework is actions based and thematically aligned with major ESG frameworks including the UNSDGs, GRI and SASB. The core areas of the Sustainable Advantage framework and desired outcomes are as follows:

MATERIAL THEME	SECTION CONSIDERED	FOCUS AND DESIRED OUTCOMES
Environmental Protection	Governance, policies and pollution management	Understanding operational pollution risks, ensuring a responsible policy management approach and compliance with regulatory requirements and minimising pollution.
Biodiversity	Ecological impact	Understanding the risks and opportunities regarding the operational impacts on nature and biodiversity and ensuring a responsible policy driven management approach. Monitoring and measuring company performance to limit negative impacts on fauna and flora.
Energy, Waste and Water	Energy management	Procuring renewable energy (transitioning from fossil fuels to renewable sources), measuring and reducing energy consumption.
	Waste management	Measuring and reducing waste generated, enhancing waste recycled and diverting waste sent to landfill.
	Water management	Measuring and reducing water consumption and identifying opportunities for water re-use.
Transport	Transport	Responsible approach to driving behaviours, use of technology such as telematics. Evolving fleet to transition from fossil fuels to low carbon fuels or electric vehicles.
		Measuring employee commuting, business travel and home working emissions and influencing behaviours through incentivisation to reduce operational carbon emissions.
Green House Gas (GHG) Emissions Reduction	Green House Gas (GHG) emissions	Measuring and disclosing Scope 1, 2 & 3 emissions in line with the GHG protocol. Setting SBTi Net Zero Standard aligned target. Carbon offsetting. Reducing emissions to halt climate change.
Climate Change Adaptation and Resilience	Climate risk and opportunity and TCFD	Understanding business risks and opportunities posed by climate change with a robust climate strategy in place.
Materials, Product Design and Lifecycle Management	Product sustainability	Reporting against the majority / all of TCFD requirements. Qualitative and quantitative climate scenario analysis conducted for >2 scenarios.
	Packaging and plastics	'Green' or 'environmentally friendly' products / services that make up a material portion of a product /service portfolio whereby the company gains a competitive advantage through these products.
Animal Welfare	Animal welfare in operations	Company participation in extended producer responsibility (EPR) initiatives including direct product take-back, recovery and recycling / closed loop system.

APPENDIX

APPENDIX C: SOCIAL

The Sustainable Advantage ESG scoring framework is actions based and thematically aligned with major ESG frameworks including the UNSDGs, GRI and SASB. The core areas of the Sustainable Advantage framework and desired outcomes are as follows:

MATERIAL THEME	SECTION CONSIDERED	FOCUS AND DESIRED OUTCOMES
Human Capital	People strategy	Ensuring a responsible policy management approach. Corporate culture focused on diversity, inclusion, equity, wellbeing, engagement and career development. HR can evidence that the workforce feels a sense of belonging and are committed to helping the company achieve its business goals. Reporting performance against comprehensive metrics set annually. Create an engaged and loyal workforce.
	Health and safety	Ensuring a responsible policy management approach and measuring H&S accidents, incidents and near-misses, setting improvement targets if necessary and reporting performance improvement annually against a baseline. Limit H&S incidents.
Customers	Product quality, safety and accessibility	Ensuring a responsible policy management approach to product quality and safety with formal external assurance accreditations and certifications in place as applicable. All ESG credentials are substantiated independently. Measuring and disclosing all metrics as applicable.
	Customer engagement	Ensuring a responsible policy management approach to customer relations. Measuring customer sentiment. Corporate ESG commitments are shared and positive sustainability behaviours encouraged. Company has insight into customer ESG behaviours across a sample of policies, behaviours and practices that signal positive citizenship.
Communities	Communities	Proactive approach to community engagement with initiatives appropriate to the size of the company. The strategic partnerships approach reflects corporate values and business objectives. Measuring and disclosing all metrics as applicable.
Supply Chain	Responsible Sourcing policy and Supplier Code of Conduct	Ensuring a responsible policy management approach with the supply chain fully engaged. Procurement team fully trained on policies and approach. Ensure supply chain is equally focussed on ESG and aligns with the company's requirements and ESG approach.
	Supply chain mapping and ESG performance improvement	Full traceability of tier 1, 2 and 3 suppliers with records in place noting ESG certifications / accreditations. A proactive approach to integrating ESG criteria into procurement decision-making processes. Sustainably certified materials are procured where possible. Supplier audit takes place. Programmes evidenced and disclosed to improve ESG performance within the supply chain. Supply chain transparency where applicable to the sector.
	Nature and biodiversity in supply chain	Understanding the risks and opportunities regarding supply chain impacts on nature and biodiversity and ensuring a responsible procurement approach defined within policies as appropriate.
	Plastics in supply chain	Measuring the quantity of single-use plastics and, if applicable, microplastics, within the supply chain, apportioned to company demand. Reporting performance improvement annually against a baseline.
	Transport and logistics in supply chain	Proactive approach towards selecting lower-impact transportation methods to reduce carbon emissions.
	Digital emissions in supply chain	Ensuring a responsible policy management approach with proactive migration of IT infrastructure to the cloud, with GHG emissions measured and disclosed.
	Animal welfare in supply chain	Ensuring a responsible policy management approach to animal welfare in the supply chain with animal products procured from responsible sources.

APPENDIX

APPENDIX D: GOVERNANCE

The Sustainable Advantage ESG scoring framework is actions based and thematically aligned with major ESG frameworks including the UNSDGs, GRI and SASB. The core areas of the Sustainable Advantage framework and desired outcomes are as follows:

MATERIAL THEME	SECTION CONSIDERED	FOCUS AND DESIRED OUTCOMES
Policy Management	Policy management	Ensuring a responsible policy management approach with employees fully engaged and aligned with the policy suite.
Business Conduct	Business ethics and oversight	The company is a purpose-led organisation with a full suite of responsible business conduct policies in place. Responsible approach to operational risk and business continuity / disaster recovery planning.
	Data and cyber security	Ensuring a responsible policy management approach to ensure compliance with data protection regulations and evidences a defensive posture towards operational cyber security.
ESG Integration	Benchmarking and alignment	The company is aligned to the United Nations Sustainable Development Goals and can evidence contribution. The company understands its ESG performance in the context of competitor and client performance and information demands. Regular stakeholder engagement on ESG material themes takes place.
	ESG management and performance	Ensuring a responsible policy management approach to ESG management and performance with designated ESG responsibilities assigned throughout the company. Performance progress is reported regularly to the board. ESG budget in place. ESG training in place. Management remuneration is linked to ESG performance.
	Strategy and reporting	A proactive approach to communicating ESG strategy with clear targets, goals and KPIs defined. System in place to capture comprehensive ESG metrics. ESG performance is disclosed into the public domain, updated annually with extensive and insightful explanations and analysis of trends.
	ESG supporting business development	Compliant approach to meet requirements of PPN 06/20 and 06/21 for public sector tendering when applicable. Measuring and disclosing all metrics as applicable.
	ESG linked-finance	ESG performance is integrated into business development function, with evidence that ESG has contributed to winning tenders.



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