

## Introduction

Cap10 Partners LLP (“Cap10”) is a pan-European private equity firm providing creativity and capital to under-appreciated businesses. We invest in companies headquartered in Western Europe with an enterprise value between €100m to €500m in sectors / themes with which we are familiar and where we are the logical investor.

We seek out businesses with an underlying societal purpose which are aligned with the UN Sustainable Development Goals, but where the situation they are in, or the transaction dynamic, is complex. Our primary focus is on public infrastructure solutions, niche industrials, essential consumer needs, health, pharma and wellbeing, and mission-critical business services. We aim to bring an active partnership to our investments to drive transformative change across the whole value chain. This includes relevant Environmental, Social and Governance (ESG) aspects, which have not been a priority before our investment, and which are often a driver for creating value. We do not always take majority positions but will always invest so as to have the ability to meaningfully influence key decisions.

## Vision Statement

Cap10 believes that every responsible person (be it an individual or a legal entity) should care deeply for the entire ecosystem within which it operates ensuring a sustainable and meaningful future for everyone. This is anchored on the fundamental belief that humans are firstly “social and moral beings”, and interdependent with the natural habitat they live and work in. Within this context, Cap10 believes that a **societal purposeful** approach (i.e. an approach that takes into account society at large) is integral to all its activities, including its investments and operations.

Our societal purposeful approach is part of our core principle of “doing what is right, in the right way”. It starts with how we want to consider and behave towards others (“**People first**”), but also addresses our overall ecosystem and how we intend to interact with it. As such, responsible investment is core to our firm’s **values** and ambitions: to build and grow world-class sustainable and purposeful businesses with the highest standard of ethics, integrity, fairness, and transparency - which in turn acts in the best interest of all (including our investors).

## Commitment

We are committed to investing responsibly and ESG and ethical considerations are integral to our investment decisions, the way we manage our portfolio companies, and how we operate as a firm. To demonstrate this, Cap10 has made a number of commitments:

- We are a signatory to the **UN Principles for Responsible Investment (UNPRI)** and commit to its six Principles. We commit to advancing the realisation of the UN **Sustainable Development Goals** through our investment strategy.

## Our approach

Cap10 considers that private equity with its long-term horizon and freedom from short-term reporting goals is naturally aligned to investing responsibly. How capital can be set to work to deliver ‘meaningful outcomes’ for all stakeholders forms the basis of our operations, investing decisions and the stewardship of our portfolio companies.

Our approach firstly looks at the alignment of the business with purpose-based outcomes, using the UN SDGs as the lens through which to assess this. The UN SDGs are a call to consciousness and action to ensure that all people enjoy peace and prosperity on a protected planet. Then we seek to ensure

that our investments both do the right thing (in terms of making a positive contribution to the wider ecosystem in which they operate) and do it the right way (which for us is about acting at all times with authenticity, integrity, and fairness). In this way we intend our investments to be a catalyst of change for good. We have developed an ESG Framework which focuses on three key areas:

- **Purpose:** understanding and articulating the wider societal purpose and impacts of the business and setting strategy to maximise the positive benefits
- **Values:** embedding integrity, transparency and fairness throughout governance and operational practices
- **People:** impacts on employees, customers, workers in the value chain, wider community and society and facilitating transformative partnerships between them

This is intended to help us to engage with our portfolio companies at every stage of our investment cycle and concentrate on the material issues, which are most likely to contribute to the effective transformation of the business.

We do not consider this policy to be a ‘finished product’, but rather it remains a work in progress as striving for excellence and continuous improvement are some of our key principles. Accordingly, as we continue to reflect on how we can best positively contribute to our ecosystem, we will continue to adapt this policy, and improve our investment and management practises. We have consulted with, and will continue to work with, experts in the field as we constantly challenge the status quo and seek to create real impactful change through our considered investing approach and allocation of capital.

## Implementation of the Responsible investment Policy

### Pre-investment

We look to invest in complex business situations where the underlying products and services often address key societal needs. Pre-investment we **screen all potential investments** to ensure we only invest in companies that are in line with our core values and approach. We will not invest in companies including (but not limited to) those which are linked to:

- An illegal economic activity (meaning any activity which is illegal under the laws or regulations applicable to Cap10)
- The production and trade of tobacco products
- The production of any weapons and ammunition
- The production or distribution of pornography
- Illegal access to electronic data networks and associated data that cannot be remedied by the time of the Fund’s investment
- Businesses solely acting as operating companies in primary industries (extraction, agriculture, oil & gas, timber)
- Gambling
- Any other activities which (in our opinion) conflict with our core values or which we feel is exploitative of vulnerable customers, communities, or habitats

As with any analysis – financial, operational, managerial - we adopt a systematic and informed approach when analysing the environmental, social and governance influences of a business. Whilst we do have checklists that help guide us, we place a strong emphasis on identifying and understanding the impact and opportunity to improve that are specific to that business.

If a company passes our pre-investment screening, it goes through **our due diligence process** to carefully assess the material ESG risks and opportunities for the specific company and the key areas on which to engage with management teams post-investment. The findings from the due diligence are reported in our investment committee papers and are an integral part of our investment decision-making process.

With a robust discussion on these topics at each stage of the Investment Committee process, we are then able to build a plan based around the most relevant issues for that particular business and demonstrate how by addressing them we can create or protect value. This is key to ensuring that we have an action plan ready to go for when the deal closes, and we can move forward with our strategy of delivering meaningful change and exploring the significant potential highlighted in our analysis.

### Active ownership and stewardship

Cap10 believes that sustainable long-term success for business only comes from aligning all stakeholders and creating a ‘win-win’ environment that respects the needs of all. This drives behaviour to create positive relationships throughout the value chain and with the wider community. We actively engage with our portfolio companies, throughout the investment lifespan, to promote sustainable business practices thereby enhancing long-term value. Our stewardship approaches are detailed here.

Although our portfolio companies are very different and face different challenges, there are some consistent practices we put in place to help them navigate their approach to creating sustainable long-term success:

- We support CEOs to articulate the societal purpose of the business and make it an integral part of the business strategy.
- We ask our management teams to develop a sustainability plan *as part of our 100 day process* addressing the material issues identified in due diligence and setting targets to address the key areas of purpose, values and people and any other relevant ESG issues for that business (such as culture and engagement, building partnerships across the value chain, energy consumption and reduction, employee wellbeing, or supply chain resilience) to meet the aim of doing business in the right way.
- We put relevant issues on the board agenda for regular monitoring, and through our seat on the board, we keep management accountable for fulfilling their societal purpose as part of the strategy and for delivering on the sustainability plan through regular review. We aim to align management’s financial incentives with sustainability targets.
- This is an ongoing conversation and is as important a part of our business review process as evaluating commercial, operational, or financial considerations.
- The setting of goals that reflect our commitment to sustainability is key as is monitoring progress and providing ongoing support. We ensure that management’s remuneration is designed to reward achievement within these goals.

The core ESG issues outlined below are regularly considered throughout the investment process. Outside of these we also explore ESG risk and opportunities which are unique to individual Portfolio Companies.

### Environmental Management

At Cap10, we will work with Portfolio Companies to understand opportunities to improve environmental management performance and unlock the potential for value creation. Areas covered include:

- compliance with local and international environment laws and standards;
- efficient use of energy, water, manufactured products and natural resources;
- reducing the production of waste and promoting the benefits of reuse and recycling;
- avoiding the use of scarce materials, incidents of pollution and negative impacts to biodiversity;
- maximising opportunities in the use of cleantech and renewable energy.

### Social Issues

We strongly believe in promoting and developing sound labour and human rights practices by working with our Portfolio Companies. This includes, but is not limited to:

- compliance with local labour laws and standards including adherence to minimum wage and working hours legislation;
- developing and maintaining health and safety and wellbeing policies and standards;
- a commitment to equal opportunities, avoiding discrimination based on age, race, gender, religion, sexual orientation or disability;
- compliance with international conventions on human rights;
- supporting the elimination of the use of child labour;
- maximising product/service safety and quality;
- developing and supporting employees through structured education, training, and skills programmes;
- engaging positively with local communities.

### Corporate Governance

Strong governance is at the heart of what we do at Cap10. It enables us to maintain the defensibility of the businesses we invest in whilst giving us the platform from which to drive the transformation change that we seek in our investments. Examples of strong governance that we seek to establish at Portfolio Company level include:

- the formation of a monthly Steering Committee;
- Appointment of a board level director responsible for ESG matters
- formalised delegation of actions from the board and clear definition of powers;
- the establishment of Anti-Bribery and Corruption policies and Codes of Conduct;
- the development and advancement of internal control systems, procedures and standards;

### Collaboration, Escalation & Conflicts of Interest

Cap 10 may collaborate with other investors where it makes sense to do so and where the overall impact may be greater than if Cap 10 were to act alone.

Cap 10 will consider escalation techniques where initial stewardship efforts have been unsuccessful. This will seek to address any barriers to the company implementing ESG efforts.

- Firstly, where we determine a company does not have the required expertise to implement new ESG requirements, the first priority will be to ensure all staff are adequately trained and supported.
- Where a portfolio company is not willing to make changes, we will first encourage peer review of successful ESG implementation and reiterate the value-add gained from successfully integrating ESG throughout a company.
- Following on from this we will seek to reinforce any requests at a board level and, in the event this is unsuccessful, we will engage with majority shareholders and seek to replace obstructive management team members.

From time to time, potential or actual conflicts of interest may arise as a result of implementing responsible investment approaches or engaging with investee entities. At all times, Cap 10 recognizes its fiduciary duty to our investors and acts in the best interest of our clients. Any potential or actual conflicts that arise are handled in line with our Conflicts of Interest Policy.

### **Disclosure and reporting**

Transparency and openness are crucial if we are to be held to account by ourselves, our investors, and the wider stakeholder community. We want to set goals that are aligned with the stated SDG intentions and to report progress in a manner that is accessible and focused, where our commitment to impactful change can be tested, challenged and improved.

We will require our portfolio companies to provide us with regular and suitable ESG disclosure to enable us to monitor and actively manage the material ESG factors identified for each company. We report annually to our investors on the ESG performance of the portfolio.

### **Governance and implementation**

It is the responsibility of every member of the investment team to ensure that our responsible investment approach, including the emphasis on societal purpose, are integrated at each stage of the investment cycle. ESG training needs for team members are reviewed bi-annually and appropriate training is provided on an at least annual basis to ensure that colleagues have the knowledge and tools they need to comply with this policy. Annual performance reviews and appraisals will include a review of the extent to which this policy is understood and implemented for each member of the investment team, and this will help to inform remuneration decisions. Part of the parameters set to establish remuneration will include ESG criteria.

Along with the founding partner, the COO/CFO forms part of the ESG committee and is responsible for ensuring implementation of this policy and its compliance across the firm.

This policy has been updated and approved by Cap10 LLP's Operating Committee on 09 July 2025. The ESG Committee will review this Responsible Investment Policy periodically.

[Appendix 1 – Cap10 ESG framework](#)

[Appendix 2 – Cap10 ESG Due diligence questionnaire](#)

# ESG Framework



Purpose	Values	People
<b>Societal purpose:</b> articulate and action the <b>societal purpose</b> of the business and its place within the business strategy	<b>Ethics and Integrity:</b> promote and exercise the highest standards of business conduct and personal behaviour	<b>Culture:</b> create great culture to attract and retain talented and diverse employees who can deliver on the business purpose
<b>Partnerships:</b> grow the business in a way that creates benefits throughout the value chain	<b>Fairness:</b> carry out business in a manner which treats stakeholders and society fairly	<b>Care throughout the value chain:</b> conduct business in a way which respects and considers people throughout the value chain, both end-users and workers in the supply chain
<b>Impacts on the environment:</b> manage and improve the environmental footprint of the business	<b>Transparency:</b> be open and honest in communications with all stakeholders	<b>Impacts on communities:</b> manage the relationship between the business and the communities in which it operates and those which it impacts

# ESG Framework | Purpose practices



Articulate a broader 'purpose' for portfolio company's existence beyond pure economic considerations

Take effective action to embed portfolio company's purpose into its operations and strategy

Act in a manner to promote fair business relationships with its suppliers and customers, and seek outcomes that benefit all parties

Manage and minimise energy usage and emissions; and promote using renewable energy sources

Take action to avoid and reduce negative environmental impacts

Manage biodiversity loss, hazardous waste, water usage and emissions

# ESG Framework | Values practices



Have robust policies to promote ethical practices which are regularly reviewed

Have robust separation of functions and delegated powers, structured risk management processes and effective board oversight

Clear policies regarding anti-bribery & corruption matters, and codes of conduct (incl. conflicts of interest)

Keep data secure and complies with GDPR

Have robust cyber-resilience procedures and data protection compliance

Act in a fair and transparent way towards all stakeholders

Be open, honest, timely and fair in all communications

Put policies in place to foster transparent & structural communication



# ESG Framework | People practices



Align incentives to promote the fulfilment of purpose and fair sharing of company success

Use tools to measure engagement and develop a culture to enhance engagement

Support and encourage a healthy and happy workforce

Be a place where people want to work

Recognise and reward talent in an open, transparent and fair way

Provide decent work and opportunities, at the real living wage (as set out by the Living Wage Foundation) or above

Promote a diverse workforce, inclusive environment and provide opportunity for development to all

Monitor the diversity of the workforce (including the board) and commit to closing the gender pay gap

Consider safety, fairness and wellbeing of end users throughout the product / service lifecycle

Responsible sourcing and procurement, screening, selection, monitoring and engaging with suppliers on their environmental and social impacts

Build relationships and partnerships/play an active role where relevant with local communities and/or with business forums, to demonstrate reputation as a good neighbour/business

Board actively considers and monitors KPIs that include responsibility towards wider stakeholders

## Cap10's ESG Practices and Associated ESG Due Diligence Questionnaire

This due diligence questionnaire is based on the 8 themes set out in Cap10's ESG Framework. Additional questions may be required for specific businesses - the SASB materiality map should be consulted to identify any additional likely areas of concern to be investigated.

Where a question is associated with a mandatory SFDR PAI indicator, the ILPA Data Convergence Project or with a UNGC, OECD and GBC principle/guideline/component, this has been noted in the 'reference' column. For further information on SFDR, UNGC, GBC and OECD - please see the relevant tabs below.

Theme	Description	Practices	Questions	Reference	Commentary	Answers	KPIs
<b>Purpose</b>							
<b>Societal purpose</b>	Articulate and action the societal purpose of the business and its place within the business strategy	Articulate a broader 'purpose' for its existence beyond the short-term generation of profit	Have you articulated a company purpose, vision and values to employees? What is it/please describe.		For an overview of the benefits of articulating and embedding organisational purpose, see HBR's The Business Case for Purpose:	Yes/No	
						Describe	
		Take effective action to embed its purpose into its operations and strategy	Do you assess how well employees understand this purpose/vision/values e.g. through company staff surveys?		<a href="#">The Business Case for Purpose</a>	Yes/No	
			Have you set goals and targets to measure how well you are achieving your purpose?		<a href="#">How to create a meaningful corporate purpose</a>	Yes/No	
			Do you consider and evaluate actions to achieve your purpose targets at board meetings alongside financial forecasts and budgets?		This is one of the key characteristics of sustainable governance systems (Bob Doppelt, Leading Change toward Sustainability, 2013)	Yes/No	
			Do you encourage employees to contribute ideas and get involved in actions to achieve your purpose?		This is one of the key characteristics of sustainable governance systems (Bob Doppelt, Leading Change toward Sustainability, 2013)	Yes/No	
			How many SDGs does your business model, products or services directly contribute to, and which ones?		<a href="#">SDG Impact Assessment Tool</a>	Number, list	Number of SDGs contributed to
<b>Partnerships</b>	Grow the business in a way which creates benefits throughout the value chain	Act in a manner to promote fair business relationships with its suppliers and customers, and seeking outcomes that benefit all parties	Have you signed up to the Prompt Payment Code (if a UK-based business) or otherwise have a policy to pay suppliers within 30 days?	GBC10	Prompt Payment Code: <a href="https://www.smallbusinesscommissioner.gov.uk/ppc/">https://www.smallbusinesscommissioner.gov.uk/ppc/</a>	Yes/no	
			What percentage of your supplier contracts are long-term contracts (with terms agreed for 12 months or more)?			%	
			How frequently do you renegotiate supplier terms?			free text	
			What percentage of your suppliers (by value) have been suppliers for more than 24 months?			%	% of long term suppliers
			How many disputes with suppliers have you had in the past 12 months?			number	
			Does the company have a system in place to monitor energy consumption?	OECD	this is a key best practice for SMEs	Yes/No	
			What is the company's total energy consumption in kWh?	SFDR Mandatory 6; ILPA Data Convergence Project KPI	The scope of energy consumption includes energy from all sources, including energy purchased from sources external to the entity and energy produced by the entity itself (self-generated). For example, direct fuel usage, purchased electricity, and heating, cooling, and steam energy are all included within the scope of energy consumption	kWh	ILPA KPI 2: Total energy consumption (kWh)
			What is the company's total renewable energy consumption in kWh?	ILPA Data Convergence Project KPI	Total renewable energy consumed from: geothermal, solar, sustainably sourced biomass (including biogas), hydropower and wind energy sources. Accounting should follow best practices outlined in RE100 and GHG	kWh	ILPA KPI 2: Renewable energy consumption (kWh)

Impacts on environment	Manage and minimise energy usage; use renewable energy sources	What percentage of the company's energy usage comes from renewable sources?	SFDR Mandatory 5	%	% energy usage from renewable sources
		Are you measuring your Scope 1 GHG emissions?	SFDR Mandatory 1: ILPA Data Convergence Project KPI	Companies may need to be supported to report GHG emissions (and Scope 3 is currently hard to assess). For SMEs, consultancies providing SECR services may be the best first step.  Note: until this becomes a legal requirement, ask this as a Y/N question (e.g. are you measuring your scope 1 GHG emissions). This needs to be part of the 100 day plan	Yes/No
		If so, please provide for the last financial year		tCO2e	ILPA KPI 1: Scope 1 Emissions (tCO2e)
		Are you measuring your Scope 2 GHG emissions?	SFDR Mandatory 1: ILPA Data Convergence Project KPI	Note: until this becomes a legal requirement, ask this as a Y/N question (e.g. are you measuring your scope 2 GHG emissions). This needs to be part of the 100 day plan	Yes/no
		If so, please provide for the last financial year		tCO2e	ILPA KPI 1: Scope 2 Emissions (tCO2e)
	Manage and improve the environmental footprint of the business	Are you measuring your Scope 3 GHG emissions?	SFDR Mandatory 1: ILPA Data Convergence Project KPI	Note: until this becomes a legal requirement, ask this as a Y/N question (e.g. are you measuring your scope 3 GHG emissions). This needs to be part of the 100 day plan	Yes/No
		If so, please provide for the last financial year		tCO2e	ILPA KPI 1: Scope 3 Emissions (tCO2e)
		<b>Total GHG Emissions</b>	SFDR Mandatory 1	tCO2e	
		Is there an environmental policy in place to demonstrate commitment to avoiding and reducing environmental impact and continually improving environmental performance?	GBC6	Yes/No	Number of portfolio companies with environmental management policy in place
		Is there a system in place for tracking and reporting environmental performance/impacts associated with the company's operations?	OECD, GBC6	Yes/No	
	Take action to avoid and reduce negative environmental impacts	Does the company set targets for environmental performance annually?		Yes/No	
		Is the board involved in reviewing environmental performance on a regular basis?		All companies should be encouraged to do this once a year	Yes/No
		Have any environmental improvement / efficiency initiatives been developed (e.g. energy, water and raw material consumption), or workplace initiatives put in place which promote environmentally friendly- behaviour (such as recycling, cycle-to-work, paperless office, internal green team/ green champion, targets for travel reduction etc) If so, please describe	SFDR mandatory 11, UNGC 8	These will vary depending on the industry and maturity of the company, but you should expect to see some initiatives in place. There is a strong connection to employee engagement even if the initiatives are small scale	Yes/No  Describe
		Do you have a process in place to consider end-of-life disposal for your equipment and to maximise recyclability?		Yes/No	
		Does the company have any sites which are in close proximity to protected areas or areas of high biodiversity value?	SFDR Mandatory 7	These are unlikely to be relevant to your sectors but are mandatory SFDR questions. These are likely to require an explanation rather than an answer.	Yes/No
	Manage biodiversity loss, hazardous waste, water usage, emissions	How many tonnes of emissions to water were made in the last financial year?	SFDR Mandatory 8	tonnes	
		Does the company make emissions to air of any pollutants under permit?		Yes/No	
		How many breaches of permit for air emissions have occurred in the past 12 months?		number	
		Do you have a waste management strategy?	OECD	Yes/No	
		How many tonnes of hazardous waste were generated in the last financial year?	SFDR Mandatory 9	tonnes	

Values								
Ethics and integrity	Have robust policies to promote ethical practices which are regularly reviewed	Is there a code of conduct/ethics in place and/or are there any policies or processes in place to ensure compliance with anti-bribery and anti-corruption (ABC) legislation?	SFDR mandatory 11, UNGC 10, OECD		Yes/No			
		When were these policies and compliance with them last reviewed by the board?	OECD	Best practice is to review policies every 12 months	Date	Number of companies with an ABC policy in place which has been reviewed in the last 12 months		
		Is training on business ethics / the company's approach to anti-bribery and corruption provided to all employees?	OECD		Yes/No			
		Have there been any actions / complaints for breach of legislation relating to corporate governance (such as anti-competitive behaviour, anti-bribery and corruption, fraud or other malpractice) brought against the company in the past 12 months?	SFDR mandatory 10		Yes/No			
		Have there been any legislative breaches, fines or incidents relating to human rights abuses or environmental laws/regulations?	SFDR mandatory 10		Yes/No			
		Is there a process in place for employees to make internal complaints, report incidents against other employees or provide feedback (i.e. whistle-blowing line).			Yes/No			
		Does the organisation have a system in place to prevent the facilitation of tax evasion in its business operations?	GBC7, OECD		Yes/No			
		Does the company pay all tax due in all the jurisdictions in which it operates?	GBC7		Yes/No			
		How many penalties for late filing of taxes has the company paid in the last 24 months?			Number	# of penalties for late filing of taxes in the last 24 months		
		Have all required filings and disclosures of financial, accounting, ownership and governance information been made to all appropriate authorities in the last 12 months?	OECD		Yes/No			
		Have all board members and relevant employees been briefed on or received training about avoiding anti-competitive behaviour in the past 24 months?	OECD		Yes/No			
		Have there been any complaints from customers, suppliers or competitors regarding anti-competitive behaviour or practices in the past 5 years?			Yes/No			
		Promoting and exercising the highest standards of business conduct and personal behaviour	Have robust separation of functions and delegated powers, structured risk management processes and effective board oversight	Is there a clear allocation of roles and responsibilities within the company?			Yes/No	
				Is delegation of authority and signing authorisation clearly set out and adhered to?			Yes/No	
	Does the company regularly assess business risks in a structured way (for example with a risk framework, risk register, or balanced scorecard)?					Yes/No	Is there a robust risk management system in place?	
	If no to the above, how often does the board consider the internal and external risks facing the company and the procedures in place to mitigate these?					free text		
	How many board meetings are held each year?					number		
			Has the board reviewed the company's resilience to cyber attack in the last 12 months?		This is one of the top 10 risk factors for companies at risk of cyber attacks, and a key part of the Cyber Essentials recommendations for companies to have board-level review	Yes/No		
			Has the company suffered any loss of data or other material cyber incident in the last 12 months?			Yes/no		

		Have robust cyber-resilience procedures and data protection compliance	Have the company's IT systems been externally reviewed, tested or certified (for example penetration testing, ethical hacking, or obtaining the cyber essentials certification) in the last 12 months?		External testing is highly recommended to identify gaps in cyber resilience	Yes/no	Number of portfolio companies which have externally reviewed, tested or certified IT systems in the last 12 months
			What percentage of employees received training or awareness raising of IT security in the last 12 months?		Employees are often the weakest link in cyber security	%	% of staff receiving training/awareness raising on cybersecurity in last 12 months?
		Keep customer data secure and complies with GDPR	Have you reviewed GDPR compliance within the last 12 months?			Yes/No	
			Do you have a policy to ensure that customers' data is kept secure and private?	OECD		Yes/No	
			How many instances of breach of customer data privacy have occurred in the last 12 months?			Number	# of instances of breaches of customer privacy in the last 12 months?
			How many customers were affected?			Number	
		Fairness	Carrying out business in a manner which treats stakeholders and society fairly	Act in a fair and transparent way towards customers	Has the board measured and reviewed customer satisfaction at board level in the last 12 months?	GBC8	
Do you have a clear mechanism for customers to raise complaints?	OECD					Yes/no	
How often does the board review safeguarding and welfare practices and outcomes?						Describe	
Transparency	Be open and honest in communications with all stakeholders	Be open, honest, timely and fair in all communications	Do you include information on your website about your business practices / approach to sustainability / social issues which impact your business operations?			Yes/No	
			Do you communicate regularly with your employees about your societal purpose and business progress?			Yes/No	
			Are there any other methods of communication to key stakeholders that have not been previously covered? If so, please describe.			Describe	
People							
Culture		Provide decent work and opportunities, at the real living wage (as set out by the Living Wage Foundation) or above	What percentage of directly employed staff are paid the real living wage as set out in the Living Wage Foundation?	GBC1	As with some other questions, the data will be important for reporting purposes: The Living Wage (as set out in link below) or the relevant local living wage for the country of operation <a href="https://www.livingwage.org.uk/">https://www.livingwage.org.uk/</a>	%	% of directly employed staff paid the real living wage
			What percentage of regularly contracted staff are paid the real living wage as set out in the Living Wage Foundation?	GBC 1		%	
			Do you employ workers on zero hours or minimal hours contracts?	GBC2		Yes/No	
			If so, what provisions are in place to ensure fair treatment?		The Good Business Charter sets out a number of ways in which employers can promote air treatment of workers on zero hours contracts	Describe	
		Recognise and reward talent in an open, transparent and fair way	Do you carry out annual appraisals / performance reviews for all staff?			Yes/No	
			Do you conduct salary and benefits benchmarking?			Yes/No	
			What percentage of fully diluted equity is available for employees?			%	
			What % of employees participate in share / option ownership or exit bonus entitlement?			%	% employees who will share in exit proceeds

High incentives to promote the fulfilment of purpose and fair sharing of company success and	What % of employees are eligible for performance-related bonuses of 15% or more of salary?			%	
	Are CEO and senior management performance bonuses tied to achievement of purpose / ESG targets as well as financial ones?			Yes/No	Number of CEOs with performance awards directly linked to ESG / purpose targets
	If so, please describe how			Describe	
Use tools to measure engagement and develop a culture to enhance engagement	Do you conduct an annual employee survey?	ILPA Data Convergence Project KPI		Yes/No	ILPA KPI 6: Number of companies which an annual employee survey?
	What percentage of employees responded to the most recent annual employee survey?	ILPA Data Convergence Project KPI		Yes/No	ILPA KPI 6: % employees responding to survey
	Are the results of these employee satisfaction / engagement surveys regularly reviewed by the board?	GBC4		Yes/No	
	What initiatives have you reviewed or put in place in the last 12 months to improve employee engagement e.g. company social events, team building?			Describe	
	Based on the results of your annual employee survey (conducted within the past 2 years), what percentage of your employees are 'Satisfied' or 'Engaged'?			%	
Be a place where people want to work	What is the number of organic net new hires?	ILPA Data Convergence Project KPI	New hires (the number of FTE joining the company, excluding hires that result from M&A) less attrition (the number of FTE leaving the business) during a given calendar year. Excludes any FTE growth or decline due to a business acquisition or business unit divestiture.	Number	ILPA KPI 5: Organic net new hires
	What is the total number of net new hires?	ILPA Data Convergence Project KPI	New hires (the number of FTE joining the company, excluding hires that result from M&A) less attrition (the number of FTE leaving the business) plus changes due to M&A	Number	ILPA KPI 5: Total net new hires
	What is the annual percent attrition?	ILPA Data Convergence Project KPI	This can be a leading indicator for company performance	%	ILPA KPI 5: Annual percent attrition
	What is the average number of sick days per employee in the last 12 months		This can be an indicator of poor employee satisfaction and engagement	Number	
Promote a diverse workforce, inclusive environment and provide opportunity for development to all	Do you have any policies or procedures in place to promote workforce diversity, inclusion and non-discrimination around hiring, training and promotion?	SFDR mandatory 11, UNGC 6, GBC5		Yes/No	
	Do you offer individual training and development to all employees?			Yes/No	
	Do you have policies, processes or initiatives in place to promote an open and inclusive work environment?			Yes/No	
	How many claims by employees for incidents of discrimination have been made against the company in the last financial year?	SFDR additional social 7.1		Number	
Monitor the diversity of the workforce (including the board) and commit to closing the gender pay gap	What percentage of the senior management team are female?			%	% of the senior management team that are female
	What percentage of the workforce are female?			%	
	What is the ratio of female to male board members? (specific numbers required for ILPA KPIs: 1) Total number of board members 2) Number of women board members)	SFDR mandatory 13 - board gender diversity ILPA Data Convergence Project KPI	This question links to the mandatory SFDR disclosure; however also asking about the senior management team (as above) is helpful because companies (especially those backed by investors) may have a smaller official board structure and a broader SMT.	Ratio	ILPA KPI 3: 1) Total number of board members 2) Number of women board members)
	What number of board members do you have from under-represented groups?	ILPA Data Convergence Project KPI	Definition of 'under-represented groups': Number of people self-identified as belonging to an under-represented group: For non-US companies: portfolio companies are encouraged to adopt governmental guidelines or, in absence of this, local convention	Number	ILPA KPI 3: Number of board members from under-represented groups

			What percentage of the senior management team / workforce are minority ethnic (based on the location of the HQ)?			%	
			What is the unadjusted gender pay gap for employees?	SFDR mandatory 12, GBC5	<a href="#">How to calculate gender pay gap</a>	%	
			Do you measure the ethnicity and disability gaps?	GBC5		Yes/No	
		Support and encourage a healthy and happy workforce	Do you have health, safety and wellbeing policies and practices in place to improve and support employee wellbeing?			Yes/No	
			Do you have any initiatives in place to promote mental wellbeing (e.g. mental health first aiders)?			Yes/No	
			Is employee health and wellbeing performance reviewed and reported on regularly?			Yes/No	
			What is the total number of work related injuries, as defined by local jurisdiction, within the last calendar year?	ILPA Data Convergence Project KPI		Number	ILPA KPI 4: Number of work related injuries
			What is the total number of work related fatalities, as defined by local jurisdiction, within the last calendar year?	ILPA Data Convergence Project KPI		Number	ILPA KPI 4: Number of work related fatalities
			What is the total number of days lost due to work related injury?	ILPA Data Convergence Project KPI		Number	ILPA KPI 4: Days lost due to injury
Care throughout the value chain	Conduct business in a way which respects and considers people throughout the value chain, both end-users and workers on the supply chain	Responsible sourcing and procurement, screening, selection, monitoring and engaging with suppliers on their environmental and social impacts	What steps are taken to ensure that no child, forced or compulsory labour is employed within the organisation's supply chain (including sub-contractors)?	SFDR mandatory 11, UNGC 2, 4,5 OECD, GBC9	For more details, see the ethical sourcing practices as set out by the Ethical Trading Initiative Base Code, covering the elimination of forced labour and abolition of child labour: <a href="https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29.pdf">https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29.pdf</a>	Describe	
			Do you have a responsible procurement policy which takes into account the human rights and environmental impact of your supply chain?	OECD, GBC9		Yes/No	Number of companies with a responsible procurement policy in place
			What percentage of goods in your supply chain comes from countries which have a rating of 5 or 5+ for no guarantee of worker rights in the ITUC Global Rights Index?		Check the latest ITUC Global Rights Index for the list of countries, here is the link to the 2021 report: <a href="https://files.mutualcdn.com/ituc/files/ITUC_GlobalRightsIndex_2021_EN_Final.pdf">https://files.mutualcdn.com/ituc/files/ITUC_GlobalRightsIndex_2021_EN_Final.pdf</a>	%	
			If you have identified any suppliers in the question above, what engagement processes do you have in place with these suppliers about their workers' rights?			Describe	
			Do you have a process for reviewing the safety/wellbeing of end users that are impacted by your products and services?			Yes/No	
		Consider safety, fairness and wellbeing of end users throughout the product / service lifecycle					
Impacts on communities	Manage the relationship between the business and the communities in which it operates and those which it impacts	Build relationships and partnerships/play an active role where relevant with local communities and/or with business forums, to demonstrate reputation as a good neighbour/business	How many hours have employees volunteered in community projects/schemes during their contracted hours in the last year?			Number	Number of hours employees have volunteered in community projects/schemes during their contracted hours in the last year
			Do you take part in any industry or business initiatives to promote good practice (such as BITC)?			Yes/No	
			Do you source goods and services from local businesses where possible?			Yes/No	
			Have you any initiatives in place to provide support (financial or otherwise) to the local communities near your places of business?			Yes/No	
		Board actively considers and has strategic oversight of the business model and its components, which includes responsibility towards wider stakeholders	Does the board have oversight of and sign off on all new business and products development, including sales strategy?			Yes/No	
			How have you considered and assessed the risk of any potential negative impacts of your products or services on end users or stakeholders?		A guide to anticipating the future impact of today's technology: Ethical OS (see link below), relevant in particular for companies dealing with data or technology <a href="https://ethicalos.org/wp-content/uploads/2018/08/Ethical-OS-Toolkit-2.pdf">https://ethicalos.org/wp-content/uploads/2018/08/Ethical-OS-Toolkit-2.pdf</a>	Describe	