

ESP UTILITIES GROUP LTD

CORPORATE & SOCIAL RESPONSIBILITY

Document Details Corporate Social Responsibility						
Version	3.7 Classification		INTERNAL			
Author	Head of Legal (OK)					
Reviewed by	Director of Legal (LD)	Last Reviewed	October 2025			
Approved by	Chief Operating Officer (SOL)	Approval date	October 2025			
Review Frequency	2 yearly	Next Review Date	December 2027			

Version history					
Version	Date	Author	Reason for new version	Sections affected	
3.0	April 2015	Mick Carr	Annual Review	All	
3.1	January 2017	Vicki Spiers	Annual Review – reformatting Addition of Last Reviewed Date	All	
3.2	November 2019	Vicki Spiers	Annual Review	All	
3.3	December 2020	Elise Whittaker	Annual Review	All	
3.4	June 2021	Paul Miles	Review for Board		
3.5	June 2023	Olivia Kalenga	Annual Review Addition of reference to subsidiaries Addition of bullet points of key responsibilities	All.	
3.6	December 2023	Tom Jenkins	Review for supporting local businesses	Section 2 Service Providers	

3.7	October 2025	Olivia Kalenga	Review	All

Policy Summary

Developed for ESP Utilities Group Ltd ("ESP") to guide both employees and external service providers.

- Aims to ensure all relationships (with staff, service providers, and customers) are valued and managed responsibly.
- Seeks to embed ethical, social, environmental, legal, and financial considerations into daily business decisions and operations.
- Applies to the company, its subsidiaries, and all interactions with internal and external stakeholders.

Key Supplier Requirements

- **Compliance**: All service providers must comply with applicable laws, industry codes, and the Corporate Social Responsibility Policy.
- **Selection Criteria**: Suppliers are selected based on company status, profile, qualifications, reliability, and adherence to laws and ESP's values.
- Reviews: ESP conducts appropriate reviews of service providers from time to time.
- No Improper Conduct: Service providers are never authorized or allowed to act improperly on behalf of ESP.
- **Timely Payment**: ESP commits to making payments for goods and services in a timely manner and in accordance with contractual obligations.
- **Environmental & Social Responsibility**: ESP engages with suppliers on their own commitment to environmental and social responsibility, and seeks to influence them to adopt ESP's approach where appropriate.
- **Local Sourcing**: Where possible, ESP will use local service providers for head office needs (e.g., catering, stationery) and aims to recruit locally for office-based staff.

Objective

The Corporate Social Responsibility Policy of ESP Utilities Group Limited "ESP" has been developed to cover the activities of both our own employees and any external service providers that we may choose to employ to design, construct, maintain and modify our gas and/or electricity distribution infrastructures and associated equipment.

We value the relationships we have with all of the people we transact with.

1. Scope

This Policy applies to our company and its subsidiaries, all our interactions, including those with staff, service providers, and Customers.

2. Responsibilities

ESP has a responsibility to ensure that all its employees and service providers understand and adhere to our values so that we can incorporate them into our daily business activities such that they become "the way things are done". These values take account of our commitment to consider ethical, social, environmental, legal and financial considerations in our business decision making process.

Our company will:

- Respect the law;
- Honour our internal policies;

- Ensure that all our business operations are legitimate; and
- Keep every partnership and collaboration open and transparent.

3. Key Principles

EMPLOYEES

We aim to provide an open, challenging, productive and participative environment based upon constructive relationships by:

- maintaining good communication with employees through the provision of regular and timely ESP information and consultation;
- providing clearly communicated goals and performance standards, implement and offer and/or request applicable training, information and authority needed to do a "good job";
- providing fair recognition and reward based on performance;
- developing individuals' talents, skills and abilities and providing encouragement to learn and progress and to participate fully in the quest for continuous improvement.

We recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. We do not tolerate discrimination on any grounds and provide equal opportunity based on merit, we aim to build a working environment where there is mutual trust and respect and where everyone feels responsible for the performance and reputation of ESP.

We are committed to providing healthy and safe working conditions for all employees by ensuring that health and safety and the working environment are managed as an integral part of the business, with employee involvement as a key part of that process.

We do not use any form of forced, compulsory or child labour. We support the Universal Declaration of Human Rights of the United Nations, comply with the Human Rights Act 1998 and respect the human rights, dignity and privacy of the individual and the right of employees to freedom of association, freedom of expression and the right to be heard.

SERVICE PROVIDERS

Our business is reliant on the vital role played by service providers for the provision of our distribution infrastructure assets. We also rely on other service providers, such as suppliers, advisers and consultants.

They must all comply with applicable laws, industry codes and this Policy. We select service providers based on their company status, profile, qualifications, reliability and adherence to applicable laws and our values and we complete appropriate reviews from time to time. We never authorise or allow a service provider to act improperly on our behalf. We also commit to making payments to service providers for goods and services provided in a timely manner and in accordance with our contractual obligations.

We engage with our suppliers on their own commitment to environmental and social responsibility, seeking wherever appropriate to influence them to adopt our approach.

Where possible we will use local service providers for the needs of the head office for example catering and stationery and will seek to recruit locally for all office-based staff

CUSTOMERS

We aim to build excellent long-term relationships with our Customers by providing our services in accordance with our regulatory obligations, developing and maintaining excellent relations with them, dealing with them directly and responsively, and providing the highest levels of customer service.

MARKETPLACE

We aim to operate as a "good corporate citizen" by:

- taking a zero-tolerance stance on bribery and corruption;
- ensuring that all advertising and marketing materials are truthful and not misleading.

SUSTAINABLE DEVELOPMENT

We are committed to making continuous improvements to the management of our environmental, social and economic impacts, and to developing a sustainable business.

4. Advice and Assistance

Advice on the implementation of this policy can be obtained from any member of the Executive Team.

5. Reporting & Policy Compliance

Any staff member who has a concern regarding matters relating to this Policy should report it immediately to their Line Manager, or member of the Executive Team.