

O X F O R D

ESG Policy

August 2025

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Introduction

Oxford is committed to integrating Environmental, Social and Governance (ESG) considerations into all aspects of its business operations. This policy reflects our dedication to sustainable development, responsible business practices and ethical governance.

1. Environmental Policy

1.1. Commitment to Sustainability

Oxford is dedicated to reducing its environmental impact through a commitment to continual improvement. As a B Corp, we recognise that environmental responsibility is essential to our business strategy, and we will work with all stakeholders to achieve our sustainability objectives.

1.2. Key Environmental Focus Areas:

- **Climate Change Mitigation:** Implementing energy-efficient practices, transitioning to renewable energy sources where possible, and supporting global climate action initiatives (See Section 4 for our full Carbon Policy).
- **Waste Management:** Reducing waste through improved resource efficiency, recycling programs, and encouraging our partners to minimise their environmental impacts.
- **Water Usage:** Implementing practices to reduce water consumption and ensure the responsible use of water resources across all business operations.
- **Biodiversity:** Protecting natural ecosystems and minimising the negative environmental impacts of our operations and supply chains.

1.3. Reporting and Accountability

We will openly report our environmental impact to stakeholders and assess our performance through ongoing reviews of practices and policies. We produce an annual Impact Report, available on our website, and report our annual carbon emissions on the SME Climate Hub.

2. Social Policy and Human Rights

2.1 Commitment to Social Equity and Human Rights

Oxford is committed to upholding internationally recognised human rights standards, fostering a diverse and inclusive work environment, and supporting the communities where we operate.

2.2 Key Social Focus Areas:

- **Human Rights:** Oxford upholds the rights and dignity of all individuals and requires that all business partners adhere to international human rights standards.

We do not tolerate any form of discrimination based on race, religion, gender, or other protected characteristics.

- **Diversity, Equity, and Inclusion (DEI):** We are committed to providing equal opportunities and promoting diversity in the workplace, ensuring that our workforce is inclusive and representative of the communities we serve. (See our separate DE&I policy for full details.)
- **Employee Well-being:** Providing a safe, healthy, and supportive work environment is a priority. We will regularly review health and safety measures and promote work-life balance initiatives (See our separate Health and Safety policy for full details).
- **Community Engagement:** Oxford strives to make a positive impact on the communities in which we operate. We aim to regularly engage in charitable giving and collaborate with organisations local to our UK and US head offices to contribute to community development.
- **Ethical Trading and Labour Standards:** We ensure that labour standards within our supply chain meet or exceed recognised standards, prioritising fair wages, safe working conditions, and workers' rights.

3. Governance Policy

3.1 Ethical Business Practices

Oxford is committed to the highest standards of ethical business conduct. We ensure that all our operations comply with legal and regulatory requirements and strive to conduct business with integrity and transparency.

3.2 Key Governance Focus Areas:

- **Anti-corruption and Bribery:** We have a zero-tolerance policy for bribery and corruption. No employee or partner is permitted to offer or accept gifts, bribes, or facilitation payments that might compromise business integrity. (See our separate Ethics and Compliance policy for full details.)
- **Whistleblowing:** Oxford encourages openness and transparency. Employees are empowered to report unethical practices without fear of retaliation through our whistleblowing policy. (See our separate Whistleblower policy for full details.)
- **Compliance:** Oxford adheres to all relevant laws, regulations, and standards. We continuously monitor regulatory changes to ensure full compliance and maintain robust governance structures. (See our separate Ethics and Compliance policy for full details.)
- **Data Privacy and Security:** We protect the confidentiality, integrity, and availability of client and employee data, complying with GDPR and other relevant regulations. (see our separate Privacy Policy at <https://oxfordsm.com/privacy-policy> for full details).

4. Carbon Policy

4.1 Carbon Footprint Measurement

Oxford regularly uploads operational data into the Plan A platform to calculate and track our carbon footprint. This data is openly reported through the SME Climate Hub to ensure accountability and transparency.

4.2 Carbon Removal

We recognise that some emissions are currently unavoidable. To address this, we invest in high-quality carbon removal projects via Ecologi, with a particular focus on Blue Carbon schemes that protect and restore coastal and marine ecosystems.

4.3 Climate Pledge Commitment

Oxford has signed up to The Climate Pledge, committing to achieve net zero carbon emissions by 2040, a decade ahead of the Paris Agreement target. This commitment drives our ongoing work to reduce emissions in line with science-based pathways.

4.4 Integration into Business Strategy

Our approach to carbon reduction is embedded into day-to-day decision making, including travel choices, energy use, procurement and supplier engagement. We will review our carbon reduction targets annually and report progress transparently.

5. Responsibilities and Oversight

5.1 Board of Directors: The Board has overall responsibility for ensuring compliance with this ESG policy and regularly reviewing its effectiveness.

5.2 Management: Peter Kirkby and Andrew Telford have primary and day-to-day responsibility for implementing this policy and monitoring its effectiveness. They are responsible for ensuring that employees, contractors, and stakeholders are aware of and adhere to the policy.

5.3 Employees: All employees are expected to familiarise themselves with this policy, uphold its standards, and report any potential breaches to management.

6. Continuous Improvement and Future Commitments

Oxford will continuously review and update this ESG policy to ensure alignment with evolving standards and stakeholder expectations. We are committed to setting measurable ESG targets and transparently reporting our progress.

Future commitments include investigating science-based carbon targets and ESG reporting frameworks such as CSRD and ISSB, and deepening our supply chain engagement.

Approved by:

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Company Secretary

OxfordSM Limited

Issue: August 2025