

Environmental, Social and Governance (“ESG”) Policy

Applies to:

- All staff (teaching and non-teaching), the directors and volunteers working in the School.
- Pupils, Parents, Guardians and Caregivers and Prospective Pupils

Availability:

This policy is made available in the following ways:

- The School’s website www.radnor-sevenoaks.org;
- Via Teams, All Staff Shared Documents, Compliance, Policies;
- On request a copy may be obtained from the School’s Office.

Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Head.
- The Board of Directors undertake a formal annual review of this policy.

Signed:



David Paton
Head



Ian Davies
Chairman of the Board of Directors

Reviewed: September 2025
Next Review: September 2026

1. About this policy

- 1.1. The purpose of adopting an Environmental, Social and Governance (ESG) Policy is to set out the standards that Radnor House (the School) will follow and guide decision-making. The likely audience for our ESG Policy will include parents, pupils, staff, suppliers, our funders, and our local community.
- 1.2. This policy will inform our ESG efforts moving forward. This includes, but is not limited to, reporting, disclosures (both material and non-material), business practices, policies, procedures, investments, board activities, stakeholder engagement, and investor relations.

2. Purpose of this policy

- 2.1. The purpose of this policy is to provide information and clarity about ESG factors and to encourage the business to understand ESG better.
- 2.2. This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

3. Who is responsible for this policy

- 3.1. The Board of Directors of the School has overall responsibility for the effective operation of this policy.
- 3.2. ESG is everyone's responsibility – all staff must understand the School's ESG objectives and work within the designated procedures to achieve them.
- 3.3. This policy is reviewed annually by the Board of Directors. Changes may be made at any time as government guidance develops.

4. Our ESG commitment

- 4.1. We strive to build a sustainable, equitable, healthy, and diverse community within the School through a combination of innovative business practices and exemplary ESG performance.
- 4.2. This commitment informs every aspect of our operations, including how we design and build new projects, operate the School, collaborate with stakeholders and report progress.
- 4.3. This Policy also sets out our approach to sustainability matters; at the heart of it is an organisational culture that has sustainability at the core of all our operations and values.

5. Our statement on climate change, the environment and energy conservation

- 5.1. We are committed to driving down our energy and carbon impacts, as we believe that climate change is one of the greatest risks to our world. We all must contribute to efforts to reduce harmful emissions and mitigate unnecessary energy usage wherever possible.
- 5.2. We seek to comply with current environmental legislation and work to minimise the impact of our activities on the environment through a significant focus on energy conservation. All staff are aware of annual targets to reduce energy usage, with Estates and Premises staff having specific responsibility to drive efficiency initiatives.
- 5.3. We actively promote the use of more sustainable materials and a paper-free environment wherever possible. We regularly support our stakeholders to avoid printing, and we will make every effort to be a digital-first business.
- 5.4. Guidance is provided to staff regularly via Staff Bulletins concerning helpful hints for energy conservation and future innovations being introduced.
- 5.5. Our sustainability program is committed to environmentally sustainable initiatives that deliver near-term efficiency, value, and health for our business, our people, and the wider community.

6. Our statement on social responsibility

- 6.1. Our focus is to deepen relationships with our key stakeholders by investing in our employees and

partnering with our parents, pupils, local community, investors and suppliers.

- 6.2. We are committed to engaging with our employees to provide a challenging, dynamic, inclusive and diverse work environment that supports their professional development, as well as promoting a good work-life balance that prioritises their overall health and wellness. There are periodic feedback surveys, and an annual employee engagement survey to ensure the leadership team receive regular feedback from staff.
- 6.3. The School's recruitment process features measures that prevent discrimination and bias, and an Equality and Diversity Policy is in place.
- 6.4. Wellbeing should be an essential component of School life. We believe that wellbeing should be a primary function of education, and Schools should be geared to the maximisation of the flourishing of the students and staff who comprise them.
- 6.5. Children's wellbeing and happiness in School underpins their attainment and achievement in School. Happy, well-motivated pupils in safe, well-run Schools learn best and leave School best equipped for success in their adult lives.
- 6.6. We will support initiatives that benefit the environment, human welfare and education. This includes skills training that advances our employee talent, which in turn improves the pupil/parent experience, and contributes positively to our local communities.
- 6.7. We will preserve and promote the protection of human rights and welfare within our business activities, as well as those of our supply chain, per our Staff Code of Conduct, Equality and Diversity Policy and Safer Recruitment Policy.

7. Our statement on ethical governance

- 7.1. We believe that good corporate governance is essential for financially sound companies. We work to implement good governance spanning overall board governance down to detailed operational controls. Specifically, we prioritise an experienced, active, and engaged board of directors with the skills to oversee and direct management, and encourage protocols that enhance transparency and good governance. A third of the directors are female, and a third are independent.
- 7.2. Our focus is to promote strong oversight, transparency and risk management at all levels of the School, ensuring the resilience and long-term preservation of value for the business.
- 7.3. We will maintain strong corporate governance practices through exemplary board stewardship, management accountability, and proactive risk management.
- 7.4. We will mitigate risk exposure and build the resilience of our business to climate change, volatility in fossil fuel prices, and other catastrophic events through informed design and foresight.
- 7.5. We cultivate strong stakeholder relationships through transparency, open communications, and responding to stakeholder input.
- 7.6. We establish clear and effective governance for ESG, set goals and establish accountability at the Board level.
- 7.7. In addition, the Board of Governance, which reports to the Board of Directors and comprises representatives from the Directors, staff and parents, provides an effective channel for transparency of our objectives and stakeholder involvement.
- 7.8. We are committed to being transparent with all of our stakeholders about ESG initiatives, successes, and goals. Our ESG report provides updates regarding our ESG program firm-wide on an annual basis, and we will provide periodic ESG updates on our website.

8. Our duty to the wider world

- 8.1. As an organisation, we also have a duty to our people, our customers, and the wider world. ESG enables us to consolidate those impacts. We value investing in our people as we value protecting our environment and being good corporate citizens.
- 8.2. Fostering openness, sustainability, and respect is our key objective. We value everyone and strive to work as one team. Our view on ESG is that it is a continuous process of aligning our operations and controls with our values as a School.
- 8.3. Our commitment to improving our social and environmental performance demonstrates a strong,

well-informed management attitude and a values-led culture that is both alert and responsive to the challenges and opportunities of doing business responsibly and sustainably.

9. Our responsibility to our pupils and their parents

- 9.1. We have an obligation to our pupils and parents to offer them the best educational and social experience. Pupils (and their parents) are at the heart of the School, and without these partnerships, our business would not exist. Part of that commitment to them is about responding to their needs, hearing their concerns and committing ourselves to the pupils' educational attainment and satisfaction.
- 9.2. ESG priorities are drawn not only from the School's concerns but also those of our pupils and their parents, who are increasingly environmentally aware and hold organisations to account for their environmental and social responsibilities. They are asking how we are improving the world around us. How are we protecting our shared natural heritage, investing in our communities and being good corporate citizens? It is imperative for us as a business that all our interactions with pupils and parents are reflective of who they expect us to be.

10. The role of our staff in ESG

- 10.1. As a member of our School community, every staff member has a vital responsibility to ensure our School thrives. When it comes to ESG, this means understanding their role in each area of ESG. They should know:
 - 10.1.1. Our strategic ESG goals;
 - 10.1.2. How we plan to achieve them and over what time;
 - 10.1.3. Their individual and team contribution to those goals;
 - 10.1.4. How to discuss our ESG goals with pupils, parents and third parties; and
 - 10.1.5. Where to report potential concerns or actions which go against our policy.
- 10.2. On an individual level, all staff have an important role to play in meeting our ESG objectives:
 - 10.2.1. Environmental:**
 - 10.2.1.1. We all have a role to play in reducing carbon emissions and getting to net zero.
 - 10.2.1.2. While as a business we are setting organisation-level targets, consider the choices you make and the environmental impact. For instance:
 - 10.2.1.2.1. Think before you print
 - 10.2.1.2.2. Switching off lights and devices fully when not in use; and
 - 10.2.1.2.3. Follow the School's recycling and energy-saving measures.
 - 10.2.2. Social:**
 - 10.2.2.1. Building a diverse and inclusive workforce where everyone feels valued is everyone's responsibility.
 - 10.2.2.2. Understanding your role in bringing people together is critical to our success as a business.
 - 10.2.2.3. From hiring the best talent to encouraging all staff to thrive, we want a workplace where people proactively work to be the best.
 - 10.2.2.4. Staff can help by:
 - 10.2.2.4.1. Challenging and reporting discriminatory or offensive behaviour;
 - 10.2.2.4.2. Understanding diversity and inclusion policies;
 - 10.2.2.4.3. Being an active ally for often underrepresented groups; and
 - 10.2.2.4.4. Leading by example in their work.
 - 10.2.3. Governance:**
 - 10.2.3.1. Good governance goes beyond having the right policies and procedures in place.
 - 10.2.3.2. It's about embedding compliance in your day-to-day work.
 - 10.2.3.3. From completing training on time to actively understanding how regulations affect

your work, good governance starts with the individual acting ethically.

10.2.3.4. Take governance to heart by:

10.2.3.4.1. Refer to policies and procedures instead of taking shortcuts;

10.2.3.4.2. Be aware of red flags for compliance failures and risks in your area of work;
and

10.2.3.4.3. Don't be afraid to call out poor behaviour or report failures.

11. ESG and our value chain

11.1. Our School does not operate in isolation. Value is created through collaboration and partnerships. Similarly, risks can arise from failing to anticipate problems, gatekeeping, and withholding critical information. Traditional risks in supply chains were generally related to quality, cost-effectiveness, and reliability. But seen through an ESG lens, the holistic nature of the third parties, from how they source raw materials to how they treat workers and comply with accepted standards, is just as vital.

11.2. A workforce health and safety incident, labour dispute, or allegation of corruption can have serious impacts on stakeholders throughout the value chain. The value chain matters, and it is connected. Customers are increasingly voting with their feet and putting pressure on companies to make ethical decisions.

11.3. Ethical procurement gets to the heart of the value chain. When we consider the entire value chain, from a raw material supplier or service provider to an end-use customer, we can better understand the needs and impacts of our business's decisions within those relationships. Ethical procurement within the context of ESG means paying attention to the carbon impacts of a supplier and the labour practices of an end-user.

12. Monitoring and enforcement

12.1. We seek to proactively prevent and mitigate instances of non-compliance with this ESG policy.

12.2. Any breaches or concerns, including ethical concerns or potential breaches in our commitment to high ethical standards, should be reported as soon as possible.

12.3. Progress on this policy is reported to the Board on a regular basis. Active participation and engagement at all levels of the business are crucial to ensure ownership of ESG among all staff. As a minimum, we endeavour to maintain compliance with legislative requirements.

12.4. This ESG Policy will be reviewed annually by the Board of Directors.