

# **Your Treasurer Ltd**

## **Environmental, Social & Governance (ESG) Policy**

**Your Treasurer Ltd Registered Office – 124 City Road, London, EC1V 2NX, United Kingdom  
Registered in England No. 07045197**

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## 1. Introduction

The ESG Policy of Your Treasurer Ltd (the Company') aims to provide a comprehensive approach to the responsible conduct of its business in the context of: Environmental sustainability; Social responsibility; and good Governance ('ESG'). The Company's strategy of embedding ESG areas into its business operations demonstrates a commitment to:

- Environmentally sustainable business practices throughout the business.
- Support for the fair and equal treatment of our professional clients, employees, suppliers and contractors.
- Maintenance of high standards of corporate governance and business ethics.

The Company's approach is to embed ESG into its operations. The ESG Policy will provide a cohesive approach for providing responsible business support services to our professional clients and employees. To do so, we will:

- Respond to our professional clients' changing needs by delivering outcomes that are economically, environmentally and socially responsible.
- Promote professional development for our employees through learning and development opportunities.

The Company's ESG Policy is approved and supported by senior management and the Board of Directors and is implemented across the business. The Company regularly reports on its progress in meeting its ESG commitments to the Board of Directors ('the Board') as a standing agenda item.

## 2. Scope and application of the ESG Policy

The ESG Policy of the Company guides all of our business activities and applies to the whole operation. The ownership and ultimate responsibility for the review of the ESG Policy rests with the Board while the development of the ESG Policy is the responsibility of the Company's Managing Director.

The Company considers the ESG Policy as essential for providing long-term value to our professional clients. As such, the development of our ESG Policy is an ongoing process which we seek to build on over time.

## 3. Our Business

### Overview

The Company's treasury support services ('the Services') are intended to help professional clients to meet practical treasury challenges as well as helping them to comply with more onerous compliance regimes that were implemented by national regulators in the period since the 2008 global financial crisis. In particular, the counterparty due-diligence part of the Services is intended to assist professional clients to make their own informed decisions on the suitability, or otherwise, of a range of potential counterparty banks and building societies.

Our professional clients come from a wide range of mainly regulated business sectors and include: banks & building societies; asset management companies; Lloyds' brokers; investment platform providers; and fin-tech companies. Further information is available on our website: <https://www.yourtreasurer.co.uk/>.

### **Prohibited business**

The Company has established a clear policy on the types of business for which it will provide the Services within clear parameters, that include prohibited business types representing elevated risk, ethical challenges or presenting adverse environmental and social implications.

The Company will decline any application for Services from the following business activities:

- Pornography;
- Animal testing / live exports / fur trade;
- Human rights abuses (e.g., child labour / oppression);
- Environmental damage / pollution;
- Extremist political or religious sects or cults;
- Firms and individuals whose profession is arms trading or mercenary activities; and
- Those who might have any involvement with incitement to racial tension or violence.

## **4. Responsible Business**

Initial due diligence is performed on all prospective suppliers by the Company prior to entering into any service agreement and, if the due diligence is satisfactory, the supplier will be reviewed and approved by the Managing Director. Annual due diligence is conducted by the Company on all unregulated suppliers.

In addition to this, all new unregulated suppliers are notified of requirements in respect of their compliance with the Company's Anti-Bribery & Anti-Corruption Policy and also the Company's Anti-Modern Slavery & Anti-Human Trafficking Policy.

In terms of the integration of ESG Policy across its business operations, the Company continues to develop its approach to ensuring that ESG themes feature in all aspects of its Services provision. This includes the capability to incorporate ESG ratings (where appropriate) into the Services proposition while noting the ongoing challenge of inconsistent ratings analysis and available data.

Consistent with the ESG focus the Company views ESG as being both intertwined and overlapping in its business, and we are proactively engaging with all three areas of ESG.

**Environmental** – The Company has already achieved a very low carbon footprint from environmental actions taken over the last few years and which is embedded in our routine operations.

We keep the use of paper to a minimum and also recycle obsolete paperwork (when appropriate) as well as providing information and reports to professional clients via a password-related secure portal. We also utilise wider recycling facilities (e.g. glass, tins, plastics, etc.) as part of a shared-facility at our office premises in order to reduce waste to landfill.

We have also automated most operational aspects and utilise a shared “dropbox” approach that allows the directors and employees to mostly work online. This includes the extensive use of electronic messaging such as email and WhatsApp.

As regards travel, we employ a hybrid-working structure that reduces how often employees and directors travel into the office. In addition, we use public transport wherever possible to visit professional clients, suppliers, etc. in the UK as part of our business activities.

**Social** – Diversity and inclusion, gender equality, and mental health support are critical to how we operate at the Company. The Company has incorporated working practices tailored to the individual needs of the directors and employees so all are recognised, supported and included.

These include flexible working hours that suits individual needs such as around childcare, adult social care and religious beliefs as well as other factors.

**Governance** – We operate responsible practices in line with industry best-practice. We have clear terms of reference that outline the responsibilities of the Board as well as having in place a detailed Anti-Bribery & Anti-Corruption Policy and a detailed Anti-Modern Slavery & Anti-Human Trafficking Policy.

## 5. Disclosures & Transparency

The ERG Policy and other relevant policies will be made available on request to existing and potential professional clients, employees, stakeholders and contractors as well as any external due diligence agency acting on behalf of any of the aforementioned.

## 6. Environmental

### 6.1 Transition to net zero

The Company recognises that every effort should be made to reduce our carbon footprint even further and to transition to net zero. Having reviewed our business activities, the Directors have pledged to replace their existing company cars with electric vehicles by 2030.

### 6.2 Climate change

The Company reviews annually the potential direct or indirect impact that climate change may have on the business as part of the wider ESG Policy review. To date the impact is assessed as immaterial.

## 7. Social

### 7.1 Anti-Modern Slavery & Anti-Human Trafficking Policy

The Company acts with integrity and its policies are reflective of its stance in upholding human rights and opposing any form of slavery. This is confirmed not only in our people policies but also in our policy stance in terms of businesses that we will not deal with, which includes those sectors implicated in human rights’ abuses as detailed in our Anti-Modern Slavery & Anti-Human Trafficking Policy in accordance with the Modern Slavery Act 2015.

The Company operates a zero-tolerance approach to all human right infringements within our own operations and our supplier relationships. As a part of this, the Company provides details in its Anti-Modern Slavery & Anti-Human Trafficking Policy of the steps it takes to ensure

modern slavery and human rights violations do not take place in any part of the business or the businesses of suppliers that we deal with.

As part of our ongoing pledge to prevent exposure to all forms of modern slavery, the Company conducts an initial and ongoing due diligence on all unregulated suppliers who wish to work with us which includes the review of adverse information on any matters, including those that fall within the ESG areas.

Any new relationships are only approved following satisfactory due diligence checks, and the Company completes ongoing due diligence checks of unregulated suppliers to include sight of their modern slavery statement.

## **7.2 Diversity and Inclusion**

The Company opposes and avoids all forms of unlawful discrimination, inequality and unethical behaviour. This includes in respect of recruitment; pay and benefits; terms and conditions of employment; dealing with grievances and discipline; dismissal; redundancy; leave for parents; requests for flexible working; selection for employment; promotion; and training or other developmental opportunities.

The Company's 'Equal Opportunities Policy' has been incorporated into the comprehensive General Staff Handbook (schedule 3) and is intended to create an inclusive, equal environment. At the heart of this policy is a focus on achieving core objectives that are critical to achieving inclusion and equality which are intended to:

- Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all employees are recognised and valued.
- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by directors, fellow employees, professional clients, suppliers, visitors, the public and any others in the course of the Company's work activities. Such acts will be dealt with as misconduct under the Company's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- Make opportunities for training, development and progression available to all employees, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the Company.
- Review employment practices and procedures when necessary to ensure fairness and also to update them and the policy to take account of changes in the law.

The Company has an established whistleblowing procedure that is also included in the General Staff Handbook (Schedule 6) which encourages all employees to speak out if they should have concerns about impropriety within the Company and includes details of a confidential helpline to maintain confidentiality.

The Company provides equality, fairness and respect for all people in our employment, whether temporary, part-time or full-time and will comply with the protected characteristics contained in the Equality Act 2010 of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or

national origin), religion or belief, sex, sexual orientation. This is documented in the General Staff Handbook (Schedule 3).

As our Services deliverables are made available to professional clients as pdf copies via our secure portal, they are capable of being downloaded and enlarged (if required) by those persons with visual disabilities. Our other IT systems are only made available to directors and employees of the Company and can be enlarged if required for reading purposes.

### **7.3 Employee health and wellbeing**

The Company seeks to embed and maintain a positive culture in which employees are valued and are actively supported throughout their time with the Company. Contracts of employment include flexibility around hours worked to take account wherever feasible the external personal circumstances of each employee.

## **8. Governance**

### **8.1 Supplier invoice payments**

The Company operates a policy of paying all suppliers within 5 business days from receipt of an invoice for deliverables already received or within 5 business days after deliverables are received unless a direct debit arrangement is in place with the relevant supplier.

### **8.2 Bribery and corruption**

The Company has a structured Anti-Bribery & Anti-Corruption Policy that reflects its opposition to all forms of bribery and corruption and which is also detailed in the General Staff Handbook (schedule 6).

The Company is committed to ensuring adherence to the highest legal and ethical standards and anti-bribery and corruption laws. We conduct business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

The Policy applies to all directors, employees, suppliers and other business partners of the Company as well as agency workers, associates, affiliates, suppliers, consultants and contractors, irrespective of their location, grade, function or standing.

The Policy is communicated to all directors, employees and unregulated suppliers of the Company to ensure their knowledge and commitment to it. The Company applies a zero-tolerance approach to acts of bribery and corruption by any of our employees, suppliers or business partners working on our behalf. A breach of the Policy will be regarded very seriously, and in the case of employees will be considered as grounds for disciplinary action, which may include dismissal. Bribery is a criminal offence and penalties can be severe.

There are several steps the Company has taken to assist in the prevention of bribery and corruption:

- ***Clear, practical and accessible policies and procedures***  
All Company directors and employees are circulated at least annually with the Policy and any queries regarding the Policy are referred to the Managing Director.
- ***Effective monitoring and review***  
It remains the responsibility of each employee to be vigilant to the risks of bribery and corruption and closely monitor and review transactions and make reports where

necessary. Each employee will be responsible for reporting any suspicions to the Line Manager or Managing Director in line with the whistleblowing policy discussed in the next section.

From a governance perspective, the Policy is subject to annual review by the Company Board of Directors for review and re-approval. This submission includes confirmation of the circulation of the Policy to directors/employees and also that systems and controls currently in place to mitigate risks attached to the Bribery Act 2010 are considered to be adequate.

### **8.3 Whistleblowing– encourage transparency and accountability**

The Company has a Whistleblowing Policy in place which is included in the General Staff Handbook (Schedule 6) and which sets out how the Company expects staff to conduct themselves while carrying out Company business with the highest standards of professionalism, integrity and honesty at all times.

If an employee considers that the conduct of another employee does not meet these business standards, and the matter that has occurred, or may occur, is so serious, (dangerous, corrupt or illegal) that it should be reported, then the Company expects that the matter should be reported immediately to the employee's line manager, the Managing Director or Protect (an independent whistleblowing charity). The Whistleblowing Policy is included in the General Staff Handbook.

The Company is committed to ensuring that employees are confident that they can raise any matter and that this disclosure will be treated as confidential and without prejudicial recourse.

From a governance perspective, the Policy is subject to annual review by the Company Board of Directors for review and re-approval to ensure that the Whistleblowing procedures continue to meet the legal requirements of the Public Interest Disclosure Act 1998.

### **8.4 Gifts and hospitality policy**

The Company has in place a Gifts and hospitality policy which permits only low level gifts and which is detailed in the General Staff Handbook (Schedule 5; Section.4).

### **8.5 Data protection policy**

The Company has in place a comprehensive Data Protection Policy which is included in the General Staff Handbook (Schedule 25). In addition, our Services agreement with professional clients includes a definition of General Data Protection Regulation ('GDPR').

## **9. Monitoring, Policy Review and Updates**

This Policy will be subject to review and approval (or re-approval) by the Board of Directors in response to material changes and as a minimum annually.

**(Next review date – 31<sup>st</sup> December 2025)**

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