ESG Policy

Environmental, Social and Governance (ESG) Policy

Verifile Limited and the Verifile group

1. Purpose and approach

This policy sets out how Verifile manages the environmental, social and governance issues that matter to our business, the standards we hold ourselves to, and how we monitor them. It is a forward-looking set of commitments, targets and operating standards, rather than a record of what we have achieved, which we report separately.
We are not a manufacturer, and we do not use raw materials at scale, so our direct environmental footprint is modest. We manage the issues that are material to a business like ours, and we are committed to continual improvement.

This policy applies across the Verifile group, including our operations in the United Kingdom, our engineering team in Porto, Portugal, and our support team in Brisbane, Australia. It covers both our direct impacts and the indirect impacts of our supply chain and the technology we depend on. It is reviewed at least annually.

2. Governance and accountability

Responsibility for ESG sits at Board level. Our Chief Executive holds overall accountability, with day-to-day oversight delegated to a designated sustainability lead, and ESG is treated as a standing risk item alongside operational risk. Delivery sits with the relevant part of the business; environmental performance through our ISO 14001 management system, data protection, information security and responsible AI with our Chief Technology Officer and Data Protection Officer, our people, wellbeing and inclusion with our people function, and responsible procurement with our operations team.

We manage ESG through our Integrated Management System, which holds our ISO 9001 (quality), ISO 14001 (environmental), ISO 27001 (information security) and ISO 22301 (business continuity) certifications together. We have completed an ESG gap analysis, and we carry out an internal ESG and climate risk assessment across a range of climate scenarios. Our sustainability performance is independently assessed by Hellios FSQS.

3. Environmental

Environmental management. We have held ISO 14001, the international environmental management standard, since 2013, held by Verifile Holdings Ltd. Our approach is set out in our Environmental Management Policy, which is reviewed annually. We maintain a register of our environmental aspects and impacts and a register of relevant legislation, set objectives and targets, and evaluate performance at an annual management review supported by compliance audits.

Carbon and climate change. We are committed to reaching net zero by 2045. Our baseline year is 2024 to 2025, our first year of measurement, with a footprint of 240.5 tonnes of CO_2 equivalent across Scopes 1, 2 and 3, calculated in line with the Greenhouse Gas Protocol using UK Government conversion factors. These figures are self-calculated rather than independently assured, and 2024 to 2025 is our first measured year, so we will report progress against it from next year. Our largest single source is employee commuting, which is why hybrid working and sustainable travel

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are central to our plan. We have set an interim target to reduce our footprint to around 110 tonnes of CO_2 equivalent by 2031, a reduction of roughly 54%, reported in line with the PPN 006 Carbon Reduction Plan standard.

Energy. We generate some of our own electricity from rooftop solar panels installed around 2011, supported by a Feed-in Tariff. We have decommissioned our gas boiler and moved to electricity, and we manage energy use through active heating, ventilation and air-conditioning control, an ISO 14001 certified cleaning contractor, and ongoing efficiency reviews of our site.

Waste, paper and electronic equipment. We operate a digital first, paperless screening platform, which keeps our waste low. Working with our waste contractor, we divert our operational waste from landfill, and we are working to increase the share that is recycled. We run a comprehensive office recycling scheme, securely shred confidential material before it is recycled, use reusable cups rather than disposable ones, and buy reconditioned equipment where we can. We dispose of obsolete IT equipment responsibly through a certified electronic-waste route under our duty of care.

Single-use plastic. We produce no plastic products or packaging, and our only plastic use is incidental office and inbound-IT packaging. We avoid single-use plastic in our office, providing reusable cups and glasses, and we support the reduction of unnecessary single-use plastic.

Travel and commuting. Business travel is low. We reduce travel emissions through hybrid and remote working, online meetings, and a Cycle to Work scheme. We operate no company vehicle fleet. We will introduce a formal sustainable travel policy.

Responsible procurement of goods. We buy environmentally friendly goods and services where we can, including non-chemical cleaning products, and we order supplies in bulk to reduce packaging. Our indirect impacts include the IT hardware we buy, which contains small amounts of critical and precious metals. We manage this through procurement from established, reputable manufacturers and certified electronic-waste disposal at end of life. We do not operate a formal conflict-minerals due-diligence programme. When we buy goods such as furniture, cleaning services and office supplies, we consider ethical and sustainable sourcing in our decisions, including the origin of any animal-derived materials, and we favour suppliers whose standards align with ours. For example, we chose an ISO 14001 certified cleaning contractor and did not engage those who could not meet that standard. We can account for the procurement choices we make.

Technology, cloud and data centres. We recognise that our main indirect environmental impact is the cloud and technology we rely on. We use established cloud providers rather than running our own energy-intensive infrastructure. We have not yet quantified the emissions of our cloud and data-centre use, and improving our Scope 3 data is part of our plan.

Water and nature. Our water use is limited to normal office use and is not a material impact. As an office-based business, our direct dependencies on and impacts on nature are limited, with our main indirect links being the IT hardware and paper we buy, managed through responsible procurement and ISO 14001.

Climate resilience. Our climate risk assessment concluded that our most significant climate related risks are indirect, arising from technology, cloud and supplier resilience and from rising disclosure expectations, rather than physical. We manage these through our business continuity arrangements, remote-working capability, reviews of our sites' exposure to flooding, overheating and storms, and supplier resilience reviews.

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4. Social

Our people and fair pay. We are an accredited Real Living Wage Employer, and we hold Investors in People Silver award. Beyond the accreditation, we carry out annual checks across our workforce to confirm pay remains above the National Minimum Wage and National Living Wage, and we advertise roles with a salary or salary range to support pay transparency.

Equality, diversity and inclusion. We are committed to equal opportunity and inclusive recruitment, and we are a Disability Confident Committed employer. We reduce bias in hiring through anonymised candidate profiles and structured, values-based questions, our careers site and application system meet WCAG 2.1 AA accessibility, and we adjust for candidates with specific needs. We do not tolerate discrimination, harassment or bullying, and our position is set out in our Equal Opportunities and Diversity Policy.

Health, safety and wellbeing. We provide a safe working environment under our health and safety policy. Every employee completes health and safety training at induction, covering fire safety, first aid, evacuation, lone working, electrical safety and stress-related issues, with an annual refresher. We support wellbeing, belonging and psychological safety through flexible and hybrid working, a quarterly "Your Voice" engagement survey that we act on, structured monthly one-to-one meetings between every colleague and their manager, and a pay-and-leave policy for kinship carers.

Learning and development. We invest in our people through structured onboarding and ongoing training, an internal knowledge base of step-by-step guides written by our specialists, monthly development conversations, and role-specific competency development.

Engagement and retention. Our people practices deliver low staff turnover, well below the industry average.

Human rights and modern slavery. We are committed to preventing modern slavery and human trafficking in our business and our supply chain, as set out in our Anti-Slavery and Human Trafficking Policy. In our own operations we provide a written contract and a statutory-rights briefing to every employee, carry out Right to Work checks, comply with the National Minimum Wage and Equal Pay Act, and train our people on modern-slavery risk. Our turnover is below the statutory threshold, so we are not legally required to publish a transparency statement, and we will publish one voluntarily as good practice.

Community. We support our community through volunteering, including three paid volunteering days per colleague each year, and through charitable activity, and we contribute knowledge and skills to our sector.

Customers and candidates. We treat candidates fairly and handle their data with care, supported by a UK-based Candidate Services team reachable by phone, live chat and email, a 24-hour knowledge base, portals that meet WCAG 2.1 AA accessibility, and multilingual support. Sensitive cases are handled end to end by a single senior specialist to protect the individual's privacy. Every complaint is logged, acknowledged within two working days and resolved within five, investigated through a structured root-cause review, and used to improve our service.

5. Governance

Board accountability and ethics. Our board sets the tone for responsible business. Our internal Code of Practice reinforces ethical conduct, including anti-bribery, anti-money-laundering and anti-bullying, enforced through our disciplinary process. We prohibit bribery, the facilitation of tax evasion and money laundering, and anti-bribery, tax-evasion and modern-slavery obligations are binding in our standard contract terms. We manage conflicts of interest, and colleagues can raise concerns through a protected whistleblowing route without fear of reprisal, including concerns about any tier of our supply chain.

Data protection and information security. Because we handle sensitive personal data, information governance is central to our ESG. We hold ISO 27001 and Cyber Essentials Plus, and our subsidiary holds PCI DSS. We comply with UK data protection law, set out in our board-approved Data Protection Overarching Statement, with a named Data Protection Officer, encryption of data at rest and in transit, role-based access with multi-factor authentication, regular penetration testing, and staff information-security and data-protection training. We store screening data in the United Kingdom, and we maintain a register of the sub-processors who may handle personal data. Buyers can verify our controls independently through our online Customer Audit Pack.

Responsible technology and AI. We use automation and, in places, machine learning and natural language processing, always with human oversight. We do not use generative AI to make screening decisions, and a human analyst quality-assures every report. Our use of AI is governed by our AI Usage Policy, owned by the Chief Technology Officer, which requires that AI tools are approved before use following documented vendor due diligence, that no personal or confidential data is entered into an AI tool without approval, and that none of our AI tools are used in a way that trains a provider's models on our data. This policy also sets out responsible-AI principles covering human oversight, accuracy, fairness, environmental impact and transparency.

Responsible procurement and supply chain. We expect the businesses we buy from to share our standards. Suppliers complete our due diligence before we contract, and we monitor them through our supplier framework, with the right to end a relationship on breach. We are introducing a Supplier Code of Conduct and building environmental and social factors more fully into our supplier assessments, alongside a sustainable supply chain policy. We seek assurance that modern slavery has no place in our suppliers' operations.

Accreditations and independent assurance. Our responsible-business standards are independently audited. We hold PBSA General Background Screening Accreditation, NSI Specialist Services Gold against BS 7858:2019, and the ISO certifications above, and our sustainability performance is independently assessed by Hellios FSQS.

Risk management and transparency. ESG risks and opportunities are integrated into our business risk management, informed by our ESG and climate risk assessment, and reported to senior leadership. We are transparent about our position. We publish a public Sustainability Statement, and we report on our progress and review it at least annually.

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6. Our measurable commitments

Area	Commitment	Target
Carbon	Reduce our footprint from the 240.5 tCO_2e baseline (2024-25)	Around 110 tCO_2e by 2031, net zero by 2045
Commuting	Reduce commuting emissions (75% of our footprint) through hybrid working and a sustainable travel policy	Publish the travel policy and set a commuting-reduction target in [2026]
Energy	Reduce office energy consumption and restore full solar output	Year-on-year reduction
Waste	Keep operational waste out of landfill and raise the recycling rate	Maintain landfill diversion and raise the recycling rate
Carbon data	Improve completeness of our Scope 3 data, including cloud and IT	Extend the inventory by [date]
Procurement	Introduce the Supplier Code of Conduct and ESG supplier assessment	Adopt the code and assess new suppliers
People	Maintain Real Living Wage and Investors in People accreditation	Retain both
Diversity	Maintain and improve an inclusive, diverse workforce	Set a measurable inclusion goal in [2026]
Governance	Review this policy, the Carbon Reduction Plan and the risk assessment	At least annually

7. Monitoring, review and accountability

We monitor our ESG performance through our management systems, our carbon and waste data, our independent assessments, our complaint and satisfaction measures, and our engagement surveys. This policy is owned at board level, with day-to-day oversight delegated to a designated sustainability lead, and is reviewed at least once a year, or sooner if our business or the relevant issues change materially. It is approved by the Board of Directors and made available to our people, our customers, our suppliers and the public.

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