

Environmental, Social and Governance (ESG) Policy

Caroola Group Limited

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1 Introduction

1.1 Caroola Group Limited consider Environmental, Social and Governance (ESG) to be an important part of the manner in which we conduct our business. ESG means we acknowledge that, as a business, we have a responsibility to our clients, staff, suppliers and other stakeholders as well as the broader society in which we operate. We aim, through our organisation's practices and policies, to create value for our staff and clients, minimise our impact on the environment and improve the quality of the local community.

2 Our strategy

- 2.1 Caroola Group Limited believe that having a clear and focused ESG strategy with clear aims and objectives has real benefits for our organisation.
- 2.2 We rely on having a healthy, diverse, and talented workforce and seek to recruit and retain the best people. Caroola Group Limited is known for offering a high level of service, and we aim, for our business to reflect the environmental and social issues that are important to our staff and our clients, as well as other relevant stakeholders. We acknowledge that, for long-term commercial success, we rely to an extent on the health of the environment and the economic strength of our local community.
- 2.3 We aim to align ESG with our business strategies and operations:
 - 2.3.1 Learning & Development Caroola Group Limited offers a dedicated academy for training for all staff including apprenticeships.
 - 2.3.2 Equality, Diversity, and Inclusion (ED&I) Caroola Group Limited is committed to being a company that celebrates diversity, respects every individual and encourages all employees to be their true self at work.
 - 2.3.3 Cyber Security Caroola Group Limited is committed to mitigating the potential risks associated with cyber threats, as part of the commitment, Caroola Group Limited have Cyber Essentials Plus certification in addition we ensure there is continued awareness and training for all staff.
 - 2.3.4 Society & Communities Caroola Group Limited recognises the responsibility we have to wider society and other key stakeholders. As a significant employer in those areas where we are based, the local

Registered office: 840 Ibis Court,



communities are keen to ensure we are supporting and investing in local jobs, operating safely and ethically.

- 2.3.5 People Our people are our main asset and are central to the ongoing success of Caroola Group Limited. Our people strategy aims to develop an agile workforce as we continue to attract, retain, develop, and motivate the right people for our current and future business needs.
- 2.3.6 Partners & Regulators We recognise the importance of our various partners in delivering services to clients and ensure we have consistent values, we seek to build positive collaborative relationships with regulators who provide key oversight of how we run our business and the sectors we operate in.
- 2.3.7 Environment/Climate Reporting Our strategy focuses on improving our operations as well as, where practical, the positive impact we can have on our clients, supply chain, and the communities we work in to minimise our carbon footprint and promote more sustainable living.
- 2.4 By putting ESG into practice, we are committed, wherever possible, to:
 - 2.4.1 having high standards of governance and risk management within our business
 - 2.4.2 conducting ourselves responsibly and in an ethical manner
 - 2.4.3 providing a positive and supportive working environment.
 - 2.4.4 Playing an active role in supporting local communities.
 - 2.4.5 provide a high level of service.
 - 2.4.6 acting fairly in our dealings with suppliers and other third parties
 - 2.4.7 minimising the impact on our environment
- 3 Overview of our ESG strategy planning process
- 3.1 Our key stakeholders are our employees, clients, suppliers, local communities, & shareholders.



- 3.2 We use the following methods to obtain direct input from our stakeholders to ensure that our strategy reflects the environmental and social issues that are important to our stakeholders: Surveys, Regular meetings/communication with internal staff, Suppliers and Regulators such as FCSA, feedback obtained from sources for example social and local media and trust pilot.
- 3.3 The key personnel involved in developing and executing our ESG strategies are as follows:

Name	Role
Andy Ross	Chief Executive Officer
Mark Lockley	Chief Financial Officer
Jonathan James	Chief Information Officer
Helen Pedder	Director of HR
Chris Bloor	Director of Compliance

4 Communication

- 4.1 We communicate this policy to our staff, Umbrella employees, Clients, suppliers, and other stakeholders by means of our website & portal.
- 4.2 We have a monthly Caroola Cares newsletter which is shared with all employees and aims to raise awareness around key topics relating to Equality, Diversity and Inclusion, Wellbeing, Environment and Giving Back

5 Responsibility and review

- 5.1 Our Chief Executive Officer, Chief Financial Officer, Chief Information Officer, Director of HR, Director of Compliance have overall responsibility for our ESG strategy and for implementing this policy. They have a key role in ensuring the systems and controls we have in place are effective.
- 5.2 All members of staff have a role to play in complying with our ESG objectives and are encouraged to make further suggestions in relation to initiatives we could

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undertake. If anyone has a suggestion, they should contact their manager or any of the individuals mentioned in 5.1.

- 5.3 We are fully committed to the highest possible standards of openness, honesty, and accountability. In line with that commitment, in accordance with our Caroola Whistleblowing Policy, we actively encourage all staff members who have serious concerns about any real or perceived departure from the high ethical standards that we set to voice those concerns openly. Our Whistleblowing Policy can be found on the portal for our Parasol employees and on the HR system for head office employees.
- 5.4 We are committed to ensuring our policy remains effective. As part of our ongoing commitment, this policy is reviewed at least annually to verify its effective operation. Records of the reviews are maintained and any necessary amendments are made to the policy, as appropriate.

6 Our commitments

6.1 We are committed to taking responsibility for our actions and to encouraging a positive contribution towards improving standards for our staff, Umbrella Employees, Clients, and Suppliers, minimising our impact on the environment and improving the quality of the local community. The ways in which we intend to give effect to this are our outlined here.

6.2 Governance and risk management

- 6.2.1 We are committed to ensuring a high standard of governance in our organisation. Further information about how our organisation is governed is outlined on our website.
- 6.2.2 We are committed to ensuring compliance with all statutory and regulatory requirements and professional standards.
- 6.2.3 We also acknowledge the importance of managing risks as it helps us ensure we are running a successful business and are committed to properly managing all risks that may affect our organisation. Our risk management procedures are outlined in our Risk Register Policy.
- 6.2.4 Caroola Group Limited hold regular meetings with all our regulators (HMRC and other Government agencies) during the year and have a proactive and transparent relationship with them. In addition, we are FCSA accredited and



assessed annually. Caroola Group Limited also look to complete internal audits to assess our processes to help us meet these requirements.

6.3 Our conduct

- 6.3.1 We aim to adopt the highest professional standards and not to act in such a way as to compromise our organisation's integrity.
- 6.3.2 Caroola Group Limited is authorised and regulated by the FCSA & HMRC and comply with all requirements.
- 6.3.3 We actively promote respect between our staff members in their dealings with each other, our Umbrella Employees, Clients, Suppliers and other third parties.
- 6.3.4 We maintain various policies including, Anti-Money Laundering Terrorist Financing, Anti-Bribery Corruption, Anti-Facilitation of Tax Evasion and Modern Slavery Human Trafficking policies. These policies set out our legal obligations and expectation. Policies are located on the portal and/or HR system.
- 6.3.5 Caroola Group Limited completes regular internal audits to allow us to review our processes, and our behaviour, feedback is given to staff and adjustments are suggested along with any action taken being logged, this is to ensure that we meet these requirements of 6.3.

6.4 Our working environment

- 6.4.1 We recognise that our staff are our most important resource. We actively seek to offer our staff a positive and healthy working environment and ensure that they have rewarding careers and job satisfaction.
- 6.4.2 We maintain various policies, which sets out the rights and expectations of all members of staff. These can be found on the portal and/or HR system.
- 6.4.3 We seek to offer competitive salary and benefit packages that are commensurate with the marketplace, and which properly and fairly reward our staff members' efforts.
- 6.4.4 We seek to ensure that all staff have access to the learning and development (L&D) they need for their own personal development, to meet



- their regulatory obligations and to ensure they can deliver a high-quality service.
- 6.4.5 We consider all staff members to be equal and we aim to create a working environment that is free from unlawful discrimination. In this regard, we maintain an Equal Opportunity Policy, which can be found on the portal and HR system.
- 6.4.6 We engage with our staff members through various approaches such as Town Halls, meetings, and internal newsletters, our staff members are encouraged to participate in any activity we hold.

6.5 Our community

- 6.5.1 We appreciate the importance of our role in supporting the local community in which we work and we believe that it is right to use some of our expertise and resources for that benefit.
- 6.5.2 On an annual basis we select a number of charities to support.
- 6.5.3 We offer every employee a day each year to spend volunteering for local good causes.
- 6.5.4 Our Apprenticeship Levy pot is substantial due to the number of employees in our Parasol Umbrella business. Caroola Group Limited is pro-actively using the Apprenticeship Levy pot that has been accumulated, both for the benefit of Caroola Group Limited and also by sharing with other organisations through its training partner Paragon and through our relationship with FCSA.
- 6.5.5 We will continue to offer a wide-ranging Apprenticeship Scheme, with the intention to remain named as one of the top 50 UK Apprenticeship Employers.

6.6 Our Services

6.6.1 We are committed to delivering a high level of service to all our Umbrella Employees, and Clients. We understand that our business exists in a very competitive market and in order to retain the good working relationship we need to deliver a secure, compliant and trusted Umbrella Payroll Solution, Accountancy and Tax Services that fully support the needs of the agile workforce. This is achieved by feedback in the form of surveys, reviewing

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- trust pilot reviews, communicating, listening, and proactively seeking advice. Having robust processes in place, ensuring staff members have a clear understanding and training in this along with them embracing the culture and work ethic of the company.
- 6.6.2 Wherever possible, we take steps to promote equal opportunity in relation to access to the services that we provide. We take account of the diversity of the communities we serve in order to ensure that, subject to legal constraints, our services are accessible to all.

6.7 Suppliers

- 6.7.1 We are committed to eliminating unlawful discrimination and to promoting equality and diversity in our professional dealings with suppliers and other third parties.
- 6.7.2 We endeavour to enter into clear and fair contracts with our suppliers. We commit to the timely settlement of suppliers' invoices.
- 6.7.3 Wherever possible, we aim to support the local economy by contracting with local suppliers.

6.8 Environment

- 6.8.1 We are committed to behaving responsibly and to minimising our impact on the environment.
- 6.8.2 In considering the environment, we have resolved to:
 - (a) understand the impact we can have on our clients, supply chain, and the communities we work in to minimise our carbon footprint and promote more sustainable living. Where we can, encourage our staff, Umbrella Employees, and Clients through the relevant communication channels to consider ways they can operate that are more sustainable and ensure they maintain as low a carbon footprint as is practically possible.
 - (b) Caroola Group Limited will continue to work through how it develops a sustainability strategy and potential roadmap to net zero and to draw upon technical guidance to further strengthen its climate reporting in future years as the journey progresses.