

Environmental, Social & Governance Policy

Part I: Policy details

1. What does this policy cover and who is covered?

This policy explains our approach to ensuring that

(A) as far as reasonably practicable, our business operations will be conducted in a manner that:

1. protects, preserves and enhances our environment,
 2. respects and ensures fair treatment of individuals and communities who may be impacted by our business activities,
- and

(B) we govern our business lawfully and with strong business ethics integrity.

In November 2022 we acted to become accredited with Green Tourism. We are proud of this initiative and what it means to our business and all those whom we impact. You can find more details of our commitments and progress [on our website].

We consider the commitments to respecting and upholding all the ESG impact factors set out in this policy fundamental to our business.

Everyone is responsible for showing concern for and awareness about our ESG impacts.

We will comply with all relevant ESG regulations. Where practicable and relevant, we endeavour also to operate to even higher levels of ESG-conscientious performance. We will continuously strive to improve our ESG impacts and to integrate recognised best practices into our everyday operations.

We will review and update this Policy regularly, as ESG standards and laws evolve, and as our business operations evolve too. Our Board of Directors endorses this Policy and is fully in support of its implementation.

Compliance is not optional

You must comply with this policy.

All our staff are expected to carry out their duties mindful of their legal and moral responsibilities to planet conservation and ESG impact.

Failure by any of our staff to comply with this policy may lead to action being taken by Wray Valley against you, under our Disciplinary Policy, which in the case of serious breaches, may result in your dismissal from the business on grounds of gross misconduct.

Non-compliance with this policy by any contractors or other suppliers of services to our business could well result in the prompt termination by us of our contract with them.

Our designated overall ESG Officer is Michelle Grist.

Any questions about this policy and how it applies to you should be directed to our ESG Officer

Michelle Grist can be reached on 01647 2777715 or at michelle@wrayvalley.co.uk.

Our ESG Officer has overarching responsibility for ensuring:

- Wray Valley's practices, policies, systems and processes are up-to-date and compliant with the relevant ESG laws and best practices affecting our business, and
- appropriate and up-to-date training, including refresher training is conducted on a timely basis, and
- that they have a good awareness of ESG risks and activity among our staff.

2. Who does it apply to?

All Wray Valley's employees and anyone else working for Wray Valley, including consultants, contractors, volunteers, interns, casual and agency workers.

3. It is not part of your employment contract

Although you are required by your contract terms to comply with all [name of business] policies, this policy is not part of your employment contract. We, [name of business], may amend this policy at any time.

Part II – Our ESG Commitments

1. Our environmental commitments

You'll find a copy of Wray Valley's environmental policy in our website.

Our designated 'first-response' Environmental Officer is Michelle Grist.

Any questions about our Environmental policy and how it applies to you should be directed to our Environmental Officer or to your line manager.

Michelle Grist can be reached on 01647 277715 or at michelle@wrayvalley.co.uk.

There are 9 environmental impact factors that we all need to be aware of and that we expect our staff and anyone else working with us to take especial steps to protect when conducting our business activities:

- 1.1. **Climate change/carbon emissions** - it's not just what you do, but what is done to you including by suppliers, landlords and other external stakeholders and influencers; we are committed to managing both our own greenhouse gas emissions and carbon footprint, and our association with any and all other entities and individuals who have environmental impact and influence, be they suppliers, customers, shareholders, government bodies, associations, institutions or other stakeholders.

Our electricity comes from 100% renewable sources.

- 1.2. **Health and Safety of our neighbours and community** – we are committed to the technical wellbeing of our neighbours and community. This means, for example, that we will

- Do not allow vehicles onto our campsite pitches
- Provide clear lines of sight for entrance and exit to our property
- Not discharge hazardous chemicals into the air, water or land surrounding our operation
- Providing safe access from the Wray Valley Trail to the A382.

- 1.3. **Pollution prevention** – pollution can affect many different elements of our climate from air and water, to soil and noise. If we're adding to the pollution of any of these during the performance of our business duties, we need to take responsible action to avoid, mitigate and manage these impacts. We expect you to take effective steps to ensure that we can always uphold this intention

- 1.4. **Resource efficiency** – we are committed to supporting the circular economy and to playing our part in ensuring the efficient and responsible use and disposal of resources. We expect you to make conscious efforts to consider reusing, repurposing, repairing and/or recycling items where it is prudent and responsible to do so. You should not simply bin or destroy items that we use in our business or you have brought to site without first giving proper thought to whether there may be a more environmentally-friendly and feasible alternative. If you are in doubt about whether something could be reused, repurposed, repaired or recycled and/or what the impact of taking such action might be for the business, or our budgets, please speak immediately with Michelle Grist.

- 1.5. **Waste management** - from bins, to food, to paper, we aim to conduct our business consciously and deliberately in less traditionally wasteful ways. We expect you to evaluate what waste what can you reduce or avoid altogether, as you go out about your contracted duties. We expect you to encourage our guests to do the same.

- 1.6. **Sanitation** – where we have an impact on environmental cleanliness, we commit to ensuring that we operate cleanly and that all processes, chemicals and resources we use are handled safely, responsibly and with appropriate safeguards and hazard-protection procedures in place and under suitable supervision and regular monitoring.

Our sewage flows to a septic tank and therefore only biodegradable products will be used and disposed of in this way.

- 1.7. **Protecting flora and fauna** – on behalf of all those covered by this policy, we commit to ensuring that in all our business activities, we are mindful of our impact on all plants and animals of any species, and especially the most vulnerable. We expect you proactively to take steps to evaluate, understand and to address those impacts so that we can avoid altogether or mitigate, to approved acceptable levels, any negative effects that we unavoidably cause in the everyday conduct of your contracted duties.

- 1.8. **Nature conservation and increasing biodiversity** - we are conscious that we are custodians of a valuable woodland habitat and are committed to preserving and improving the biodiversity of our land and within Dartmoor. Our current initiatives can be viewed on our website. For example

- Plant new hedges - over 1000 trees have been planted
- Plant a new orchard - 18 trees planted
- Regenerate existing apple trees
- Regenerate our wet woodland (Atlantic Rainforest) by selected coppicing

- 1.9. **Animal welfare** – we believe in protecting animal welfare and we actively ensure it within our working practices. This means

- Our chickens are free range and have good quality housing, subject to Avian Flu requirements

2. Our social commitments

You'll find a copy of Wray Valley's people-related ESG policies in our Staff Handbook.

These policies include our:

- Health and Safety Policy
- Mental Health and Wellbeing Policy
- Equal Rights and Opportunities Policy
- Anti-Bullying and Harassment Policy
- Disciplinary Policy
- Grievance Policy
- Whistleblowing Policy

Our designated ESG People Officer is Michelle Grist.

Any questions about our people-related ESG policies and how they apply to you should be directed to our ESG People Officer or to your line manager.

Michelle Grist can be reached on 01647 277715 or at michelle@wrayvalley.co.uk.

There are 3 social impact factors that we all need to be aware of and that we expect our staff and anyone else working with us to take especial steps to protect when conducting our business activities:

- 2.1. Occupational health and safety of our workers and those with whom we come into contact while performing contracted duties
- 2.2. Employee wellbeing (including mental health) – we commit to upholding and monitoring the wellbeing of all those covered by this policy and to ensuring that behaviours, practices or processes that could negatively impact employee wellbeing are identified, eradicated and, if necessary, sanctioned and proactively prevented from recurring.
- 2.3. Diversity, equity and inclusion in our business practices and daily treatment of each other (including in ensuring fairness, open-mindedness, tolerance and respect for gender, ethnicity, age, disability, etc of all individuals). Full details of our equal rights and opportunities commitments are set out in our Equal Rights and Opportunities Policy which is located in our Staff Handbook.

3. **Our governance and business integrity commitments**

You'll find a copy of Wray Valley's governance and ethics-related policies in our Staff Handbook.

These policies include our:

- Data Privacy Policies
- Social Media Policy
- Customer and Stakeholder Complaints Policy
- Disciplinary, Grievance and Whistleblowing Policy

Kevin Chamberlain oversees Wray Valley's governance obligations and reports to our Board of Directors, who all bear responsibility for ensuring goods, lawful governance and practice of sound business ethics within our business.

Any questions about our governance policies and how they apply to you should be directed to Kevin Chamberlain.

Kevin Chamberlain can be reached on 01647 277715 or at kevin@wrayvalley.co.uk.

There are 11 governance impact factors that we all need to be aware of and that we expect our staff and anyone else working with us to take especial steps to protect when conducting our business activities:

- 3.1. **Corporate governance** - we will ensure that it is always clear from our constitutional documentation, our reports, filings, internal processes, frameworks and daily interactions, who is supervising the business, what structures, functions, audit, risk-management, compliance and reporting processes are in place and that we conduct our activities lawfully and transparently.
- 3.2. **Anti-bribery and corruption measures** – we commit to ensuring that appropriate educational resources and training is in place so that all staff and those associated with us understand our position, any risks that might arise within our business activities, and how to handle them.
- 3.3. **Anti-money-laundering measures** - we further commit to ensuring that appropriate educational resources and training is in place so that all staff and those associated with us understand our position on handling payments and money within our business, and that they are well-equipped to spot and handle any risks that might arise.
- 3.4. **Compliance with sanctions** – to the extent that our business is ever impacted by government-imposed sanctions, we expect you to comply with our commitment to compliance with them.
- 3.5. **Grievances and complaints mechanisms**. Internally, we have a Grievance Policy that you can use to raise concerns about the way in which we operate or the behaviour of any particular individual within our business. Complaints by external stakeholders are handled according to our Customer and Stakeholder Complaints Policy.
- 3.6. **Whistleblowing policies and procedures** - details are set out in our Whistleblowing Policy which is located in our Staff Handbook. You must familiarise themselves with its content.

- 3.7. **Ensuring tax/fiscal compliance** - we are fully committed to operating our business in a fiscally-compliant manner. You are expected to support this commitment and are required to comply with our financial and tax obligations. All questions regarding our tax obligations should be directed to Kevin Chamberlain, who can be reached on 01647 277715 or at kevin@wrayvalley.co.uk.
- 3.8. **Effective Data Privacy management** - it is essential that we handle the personal data of any individual compliantly, responsibly and with great respect and diligence.
- 3.9. **Political lobbying and donation activity** -To the extent that we engage in this kind of activity, we commit to doing so ethically and transparently.
- 3.10. **'Positioning'** - how we communicate what we do/stand for/believe in, to whom, when and by what responsible means. We take this just as seriously as all other commitments. Our values, purposes, position within society and how we communicate it goes right to the heart of who we are as a business. We expect you to communicate responsibly and sensitively about our business, people and beliefs and to show great consideration to others in doing so. Those authorised to speak officially on behalf of our business will be trained and supported to do so.
- 3.11. **Reporting activities responsibly** – it is vital that we report our activities compliantly and timely and we will take all steps to ensure that this is the case. If you have any questions about how, when and where we report our activities, please address them to Kevin Chamberlain, who can be reached on 01647 277715 at kevin@wrayvalley.co.uk.

Part III – Your duties

We commit to providing relevant training and support to enable you to perform your duties in a manner that supports climate-positive change or at the very least, neutralises any unavoidable negative impacts.

We commit also to:

- Keeping our policy materials and supporting resources up to date and
- Engaging constructively with external stakeholders and the public, to inform, consult, involve and empower as a way of avoiding, mitigating or managing negative ESG impacts or leveraging E&S benefits.

It is your duty to ensure that you comply with the obligations and responsibilities set out in this policy.

1. Your duties include:

- 1.1. Taking time to ensure that you understand your responsibilities and duties as set out in this Policy, and asking questions where you are unsure, so that we can all take informed and conscious steps to reduce our carbon footprint and other environmental impacts
- 1.2. Attending all training and refresher training sessions as appropriate
- 1.3. Participating fully and willingly in any and all ESG impact and risk assessments that we may conduct on the business from time to time
- 1.4. Reporting ESG impact incidents immediately and in compliance with the reporting directions set out in Section 2 below
- 1.5. Complying with ESG rules and regulations and helping our business to take a proactive approach to future requirements and developments, as they become known
- 1.6. Where you are able to influence such decisions and execute appropriate actions, to:
 - a) encourage the development of products, processes and choices of equipment in an ESG-conscientious manner, and to
 - b) support our business and your colleagues in working only with responsible suppliers who have compatible policies for managing their own impact on the environment and society and who operate to high standards of business ethics and integrity.

2. Reporting an incident

In the event of an ESG-impacting incident while you are working for Wray Valley, you must report immediately to our ESG Officer.

Please ensure you correctly and responsibly give all the relevant details of the incident to the ESG Officer, who will investigate to determine the appropriate action.

Where appropriate, you may wish to use our Grievance Policy or in severe cases, you may want to consider our Whistleblowing Policy. You can find these policies in our Staff Handbook.