

Shaping the Future in Metal

Sustainability Report 2024/2025



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Overview The Hadley Group

Founded in 1964, we are a privately owned global engineering and manufacturing company and a recognised leader in cold roll forming technology and structural steel components.

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With manufacturing facilities across the UK, UAE, Netherlands, Thailand, and a Joint Venture in the USA, we partner with customers across a broad range of sectors. Our technology—including cold roll forming and Ultrasteel™ manufacturing—is used to enhance the performance of steel profiles, while our in-house design team, from tooling to structural engineering, is focused on optimising resource use, minimising waste, and driving sustainable development.

Sustainability is fundamental to our operations. It reflects our commitment to both business success and community wellbeing. Our growth strategy is directly aligned with making impactful contributions to the environment and society. This commitment is supported by significant investment in R&D, including the design and construction of our own rolling machinery and tooling, enabling us to consistently deliver high-quality, innovative products.



A Global Organisation

3 continents with
7 manufacturing hubs
servicing **36** countries across
70+ rolling mills, **delivering**
130,000+ tonnes of
products each year.

£160m+
Revenue

15%
CAGR

£230m
By May 2030



Business Model and Strategy: Driving Sustainable Growth

At Hadley Group, sustainability is a core enabler of our business strategy and fundamental to how we operate. By embedding sustainability into our model, we support long-term growth and solidify our position as a trusted partner across our value chain.

We view the challenges of climate change, resource depletion, and social equity not just as risks to be managed, but as powerful catalysts for innovation, efficiency, and competitive advantage. Our business model is proactively evolving to create shared value for both the company and society through:



Sustainable Product Innovation

Developing solutions that minimise environmental impact



Value Chain Engagement

Collaborating with partners to ensure responsible practices



Operational Efficiency

Optimising processes to reduce waste and resource use

This approach is a direct path to business resilience and long-term growth. To ensure true integration, we are fostering a shared mindset across the organisation by engaging employees and improving our internal reporting systems. These systems provide timely, actionable sustainability metrics to business unit leaders, cascading accountability throughout the company.

With Board-level oversight, integrated risk management, and sustainability-focused investment decisions, we have robust governance in place. Hadley Group is positioned to build a resilient, competitive, and profitable business that drives sustainable development. We remain steadfast in our commitment to responsible business practices, upholding human rights, safeguarding the environment, and conducting business with the highest standards of integrity.

About Our Report

This Sustainability Report provides an update on our continued progress against the Hadley Group 2030 Sustainability Roadmap.

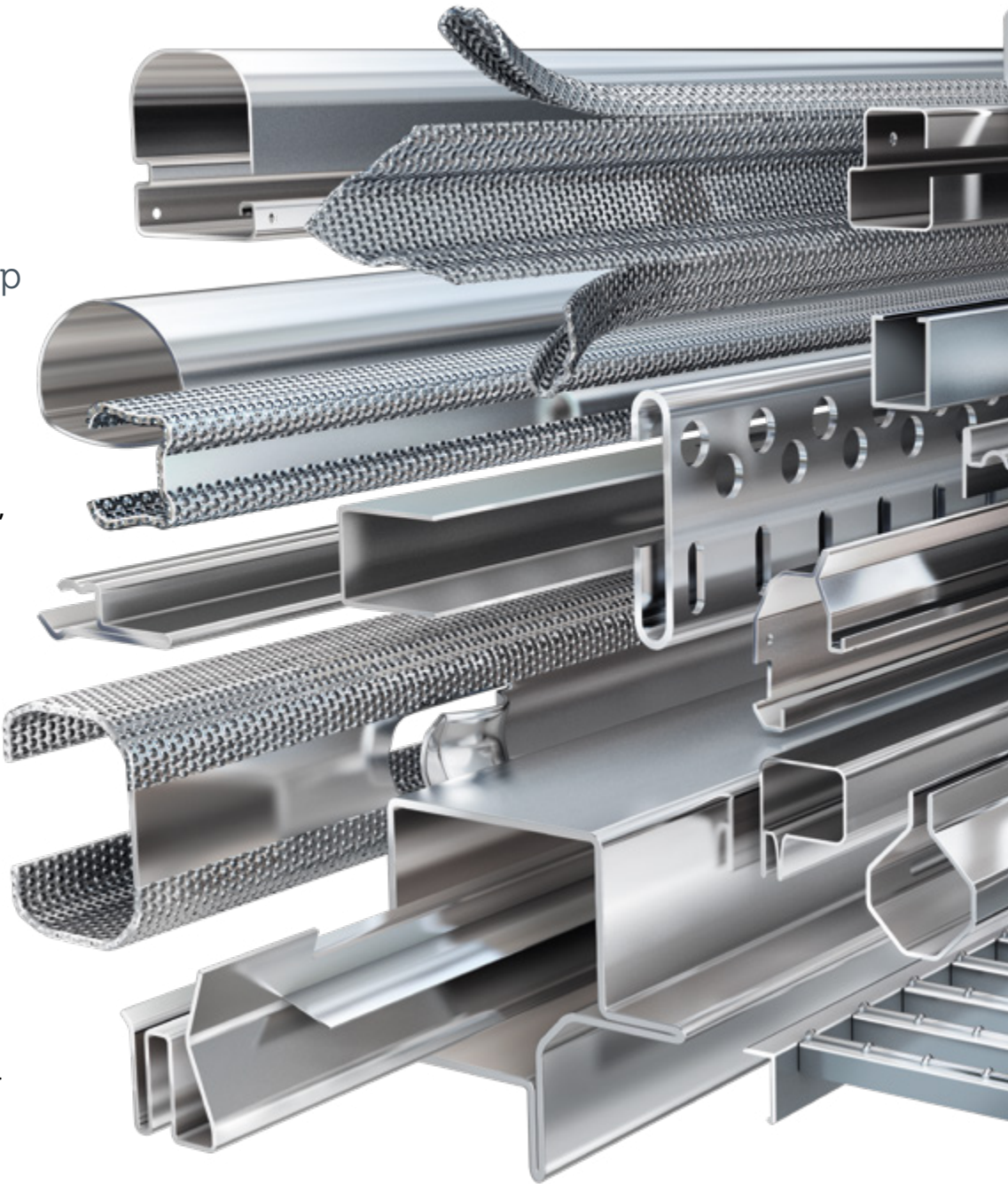
As we progress towards our 2030 goals, we are committed to embedding sustainability deeper into our business model to create long-term value for all stakeholders.

The roadmap is designed to drive sustainable development within our sector, create new commercial opportunities, and foster collaboration to make a positive global impact.

This report covers the period from **May 1, 2024, to April 30, 2025**. It provides enhanced, transparent disclosure of the Hadley Group's policies, practices, and performance across the core pillars of sustainability: **Environmental, Social, Economic, and Governance (ESG)** impacts and goals.

The content and performance data include all operating companies in the **United Kingdom, Thailand, UAE, and the Netherlands**. Note that due to operational control limitations, there are significant environmental data exclusions relating to our joint venture operations in the United States of America.

We aim to facilitate an accurate assessment of our performance and encourage open dialogue on both our achievements and the challenging sustainability issues facing our sector. We look forward to continued engagement with our stakeholders—including our people, customers, communities, suppliers, and shareholders—in the year ahead. We invite your feedback, thoughts, or questions on this report.



A Message from our Group Managing Director

At Hadley Group, our unwavering commitment to sustainability is reflected in our core values and organisational purpose.



Our Sustainability Strategy emphasises climate action, responsible business practices, community engagement, operational excellence, and the cultivation of a diverse and engaged workforce. With over seven years as Group Managing Director and twenty years at Hadley Group, I can attest to our sustained dedication to sustainability initiatives. We are encouraged by the progress we have achieved across the primary pillars of our ESG and Sustainability Strategy and remain focused on upholding integrity through ethical and responsible business practices.

Fiscal year 2024/25 marks a major shift in our sustainability efforts. We updated our approaches, set clear five-year goals, empowered teams for greater impact, increased stakeholder engagement through education and training programmes, and strengthened our climate resilience.

We have aligned all Group operations with our Sustainability Agenda, and our updated strategy and 2030 roadmap strengthen our ability to deliver sustainability initiatives effectively.

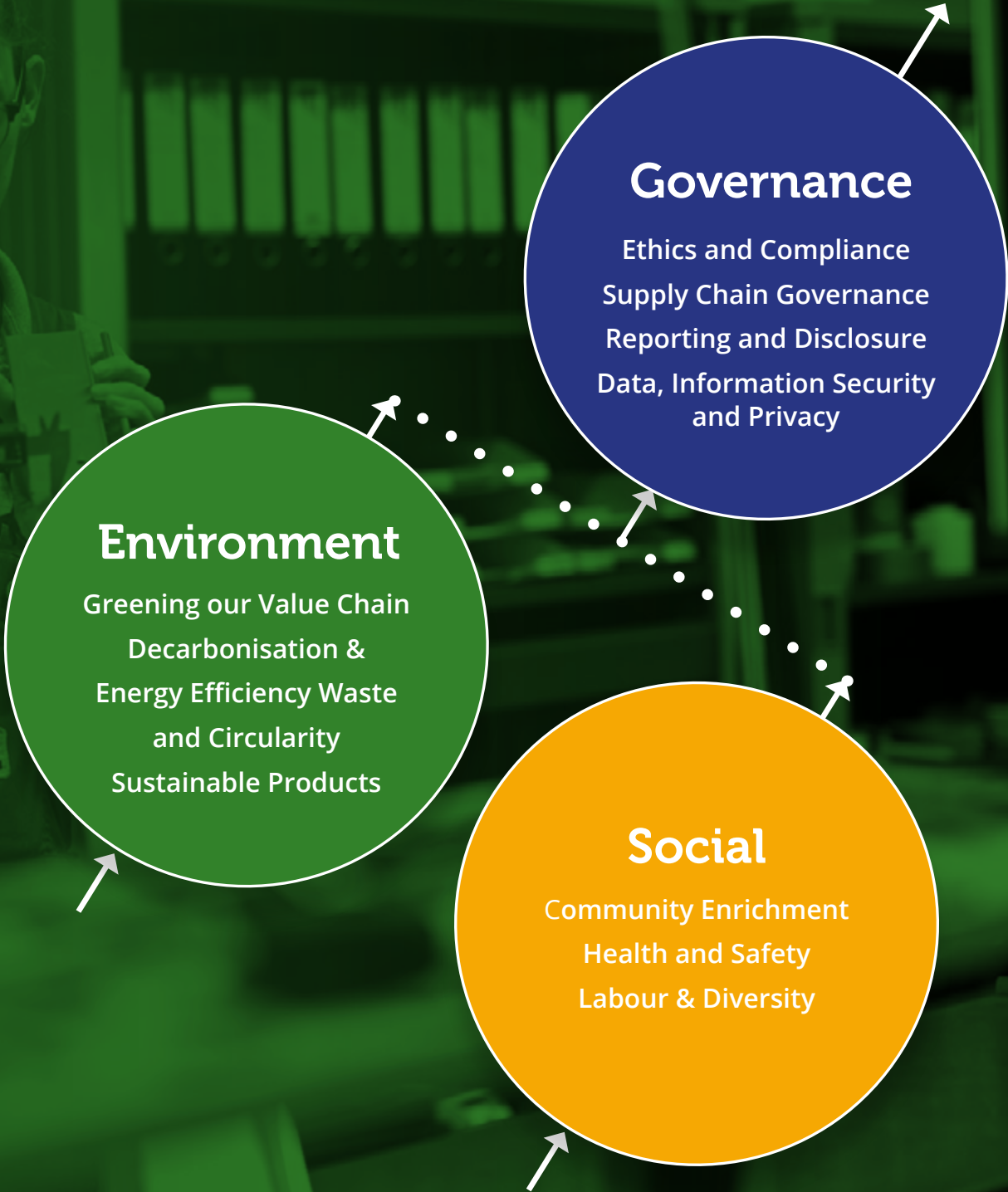
This report highlights our commitment, achievements, and ongoing progress over the reporting period from 31 May 2024 to 30 April 2025, including key results in core areas:

- Continued and increased focus on colleague development, health and wellbeing.
- Setting strong environmental targets to drive our climate action.
- Driving operational excellence.
- Adopting circular economy.
- Greening our fleet operations by transitioning to sustainable alternative fuels
- Expanding our scope of sustainability governance.
- Proactive approach to ESG and Sustainability reporting.

We aim to show credible sustainability leadership by acting on our commitments and providing transparent disclosure. By engaging with peers, policymakers, and stakeholders, Hadley Group helps create a supportive environment for progress, responds proactively to new policies and regulations, and enhances transparency and accountability.

We appreciate your engagement and thank all those that have contributed as we advance our Sustainability initiatives. We value your feedback and invite you to visit our website and follow our social media channels for the latest updates on our sustainability progress and plans throughout the upcoming year.

Ben Towe
Group Managing Director



2030 Sustainability Roadmap: Themes, Focus Areas, and Commitments

Strategic Theme	Key Focus Areas	Our 2030 Goals and Targets
1 Governing with Integrity	Risk Management & Compliance, Supply Chain Governance, Ethical Conduct	Assurance & Ethics: Maintain independent third-party assurance on key sustainability data points.
		Supply Chain: Audit 100% of high-risk suppliers for human rights and environmental compliance.
		Training: Ensure all employees train to the Code of Conduct and Ethics..
2 Empowering Our People	Community Enrichment, Health & Safety, Labour & Diversity	Community Investment: Widen scope and increase spend on local community development projects by 25%.
		Safety: Target Zero Harm and continuously reduce the Total Recordable Injury Frequency to <50.0 per million hours worked by 2030 , against the 65.4 baseline set in April 2022.
		Workforce: Strengthen our commitment to human rights across the supply chain and increase the percentage of women in the workforce and management roles.
3 Our Environment, Our Responsibility	Waste & Circularity, Climate Change & Energy, Greening Our Value Chain	Waste: Maintain zero waste to landfill status across our operations where this is possible and deepen the principles of circularity into core business operations. 95% recycled production waste by weight, sourcing raw materials with recycled content where viable.
		Climate Action: Achieve a 40% emission reduction across Scopes 1 and 2 and progressively reduce our Scope 3 emissions.
		Value Chain: Establish a sustainability best-practice eco-system with our key supply chain partners.

Sustainability Performance Highlights FY24/25

We are proud of the significant progress made across our strategic themes this year, solidifying our foundation in governance, empowering our people, and accelerating climate action.

Strategic Theme	Key Focus Areas	Our 2030 Goals and Targets
1 Governing with Integrity	Supply Chain & Governance	Top 10 direct suppliers by spend were audited for sustainability practices, reflecting increased screening and objective-setting for partners.
		Launched our first-ever Sustainability Governance Framework to drive consistent implementation across the Group.
		Strengthened overall governance by revising risk management processes and filling policy gaps.
2 Empowering Our People	Workforce Potential & Development	Demonstrated equitable reward practises 75.56% of female employees and 86.5% of male employees received a pay bonus in the UK, and our colleagues in other operating regions also benefitted from other pay bonus schemes.
		Invested in employee learning and development: 2291 eLearning courses (2208 hours), mandatory training – 322 courses across UK operations (equating to 2020 hours)
		Advanced Apprenticeship programme (UK) with 22 levy-funded programs and 11 apprenticeship courses running.
3 Our Environment, Our Responsibility	Carbon Reduction & Decarbonisation	Maintained strong safety: achieved a Total Incident Frequency Rate (TIFR) of < 50.0 per million hours, at the end of FY24/25 the Group TIFR was 44.1 and improved by 22.8% over the prior year.
		Achieved a 40% emission reduction in Scope 1 and 2 emissions since the 2023/2024 baseline year.
		Completed the full transition of our distribution fleet fuel from diesel to Hydrotreated Vegetable Oil (HVO) in FY23/24 delivering a 31% reduction in emissions against our baseline . FY 24/25 emission reduction – 984tCO2e
		Initiated business digital transformation to optimise emissions reporting and revalidate Scope 3 emissions to ensure comprehensive coverage.

Sustainability Approach: Building a Future-Ready Business

Our 2030 Sustainability Strategy is designed around key focal points across the environmental, social, and economic pillars.

This approach is fundamental to enhancing our brand reputation, ensuring business viability, and strengthening our corporate culture—making us fit for the needs of the present and the future.

We developed this strategy through a rigorous process that ensures its long-term success:

We are committed to maintaining transparent accountability. We will regularly communicate our performance and progress toward these goals through robust public reporting, aligning our disclosures with credible global frameworks and standards.



- Integration**
Seamlessly embedding sustainability into our wider corporate business strategy.
- Commitment**
Securing clear leadership commitment and robust governance.
- Assessment**
Utilising a materiality assessment and comprehensive stakeholder engagement to prioritise the most critical issues.
- Measurable Goals**
Establishing thoughtful, clear, measurable, and time-bound targets (TMTs) aligned with our vision.

Our Guiding Principles

Our sustainability strategy and its implementation across all Hadley Group businesses are governed by three core guiding principles.

THESE PRINCIPLES ARE THE FOUNDATIONAL PHILOSOPHY THAT DRIVES OUR ACTIONS:



Protecting Natural Systems

Minimising our environmental footprint and promoting ecological health



Maintaining Social Equity

Ensuring fair outcomes and positive impact for all people and communities



Ensuring Economic Viability

Achieving long-term business resilience through responsible governance and continuous innovation

These principles serve as our internal compass, directing all strategic sustainability decisions, operational choices, and investment priorities. They directly translate our purpose into measurable and responsible action by informing our performance metrics and goals.

Responsibility and Management

Accountability for the Hadley Group's sustainability performance begins at the highest level.

BOARD AND SENIOR LEADERSHIP TEAM

The Board retains overall responsibility and ultimate accountability for the management and strategic guidance of all sustainability-related risks and opportunities.

The Senior Leadership Team (SLT) drives the execution of the sustainability strategy. The SLT supports the Board and key business functions by providing direction, establishing our commitments, and setting ambitious targets.

THE SUSTAINABILITY TEAM

The dedicated Sustainability Team is responsible for the strategic development and oversight of the Group's sustainability direction. This team:

- Defines measurable targets and Key Performance Indicators (KPIs) in collaboration with business units.
- Facilitates the implementation of Group-wide sustainability measures.
- Ensures data quality, robust internal controls, and accuracy in external reporting.
- Coordinates daily activities and supports the integration of sustainability across all functions and business units.

Collectively, this structure ensures a clear line of sight, from high-level strategic oversight down to daily operational execution

Sustainability Strategy

Our 2030 Sustainability Strategy is defined by three interconnected pillars:

- Responsible Governance
- Positive Social Impact
- Decisive Environmental Action

This approach is fundamental to enhancing our brand reputation, ensuring business viability, and strengthening our corporate culture—making us fit for the needs of the present and the future.

We developed this strategy through a rigorous process that ensures its long-term success:



Greening our Value Chain: Sustainable Sourcing and Procurement

We commit to **prioritising sustainability in every supply chain portfolio decision**, making environmental and social performance central to how we select partners and manage our resources.



Climate Action: Decarbonisation and Green Energy

We are taking decisive action to mitigate climate change through ambitious targets, a move toward energy self-sufficiency, and strategic investment in technology.

- **Aggressive Emission Targets:** We are committed to achieving a 40% emission reduction in **carbon emissions** across our operational footprint (Scopes 1 and 2), and a progressive emission reduction across our extended value chain (Scope 3) by 2030.
- **Green Energy Transition:** We will work to **progressively minimise our reliance on external grid electricity** by adopting **self-generated green energy** to fulfil our own energy requirements by 2030.
- **Technology-Driven Approach:** We will actively **leverage new technologies** to continuously optimise and advance our path to decarbonisation.



Community Enrichment: Investing for Lasting Social Value

We established a new **Social Value Fund** designed to move beyond general contributions and deliver **targeted, profound, and highly impactful support** to the communities we serve.



Future Proofing: Investing in Potential

We are **investing in the potential of our people** to be a core driving force. This ensures we remain a **forward-thinking business** that empowers both our employees and our customers for long-term success.



Operational Excellence: Maximising Service and Minimising Impact

We are committed to **optimising our operations** to achieve a dual benefit: providing superior service to our customers while significantly **reducing our environmental footprint**.

A core component of this excellence is advancing the principles and practices of the **circular economy** throughout our business.



Innovation & Technology: Driving Strategic Advantage

We are committed to **embracing innovation and technology** as a core strategic lever, using it to **accelerate sustainable business growth** and enhance our overall market impact.





Materiality Assessment: Defining Our Focus

In 2025, we completed our first comprehensive materiality assessment to identify and prioritise the most critical Environmental, Social, and Governance (ESG) issues facing the Hadley Group.

This assessment was foundational: it provided the base for our **2030 Sustainability Roadmap** and will guide our reporting obligations for key sustainability risks and opportunities moving forward.

We utilised a quantitative approach, engaging a broad range of stakeholders, including our people, suppliers, customers, communities, and shareholders, alongside input from leadership teams across the Group.

The results of this process have had a significant impact on our strategy, leading us to reorganise our sustainability goals. Specifically, we have:

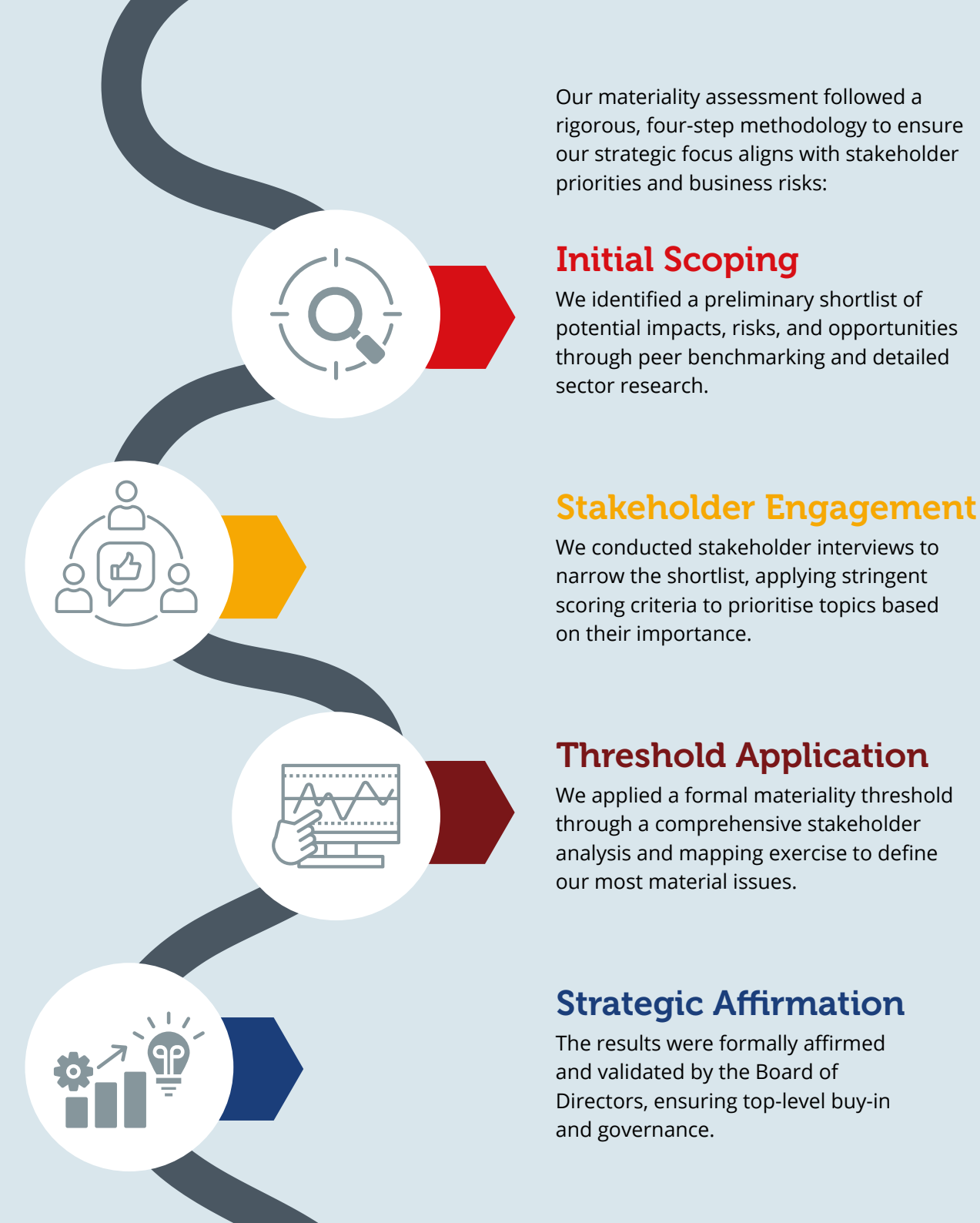
Accelerated
the focus on our **Empowering
Our People** goal

Strengthened
our overall governing
processes

Refocused
our environmental efforts
for greater impact

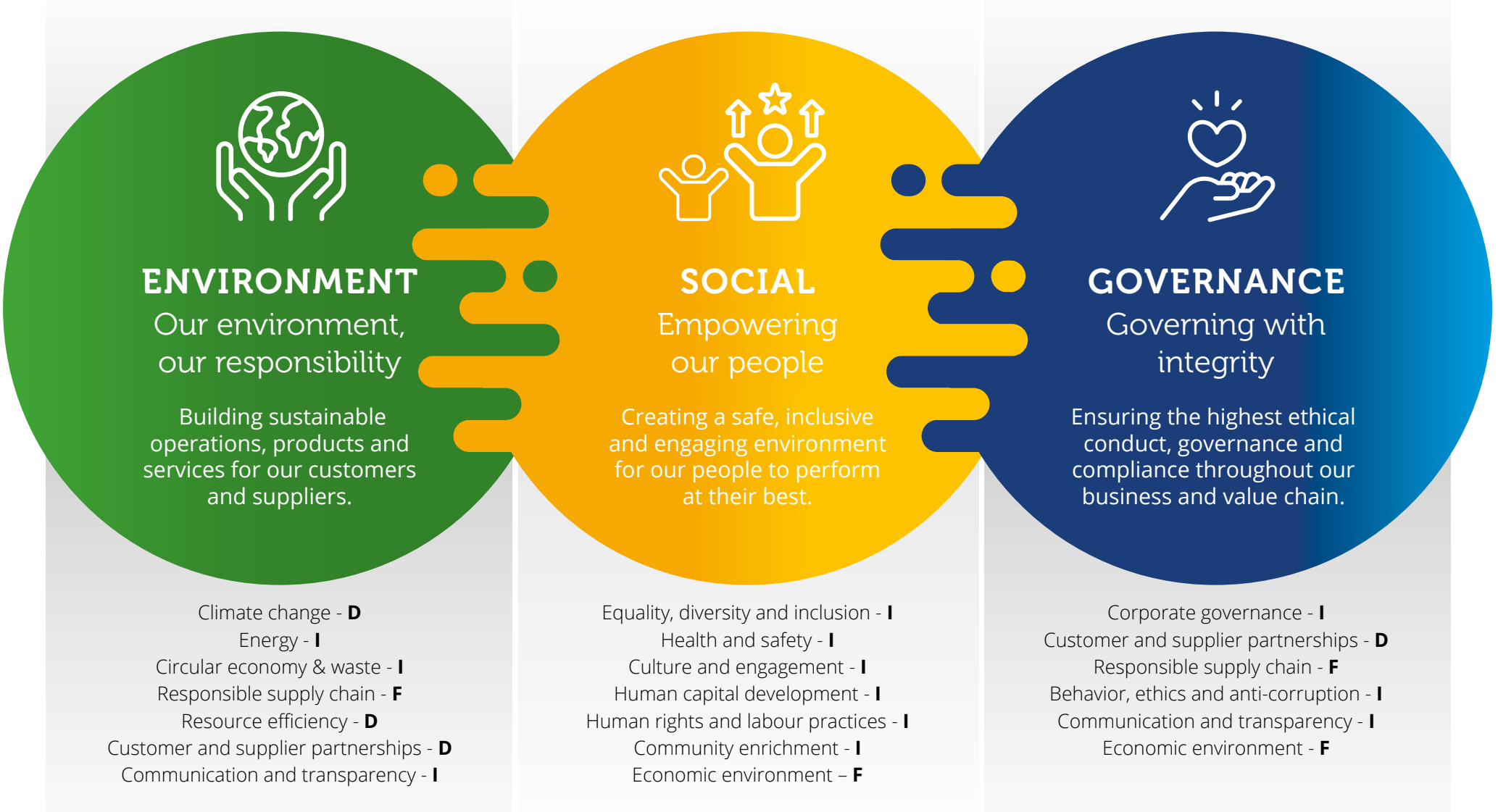
This exercise ensures our sustainability goals and initiatives are fully aligned with both stakeholder expectations and our core business strategy.

We commit to continually monitoring the evolving regulatory landscape and strengthening our materiality assessment processes through regular stakeholder engagement.



Our Material Sustainability Topics

In 2025, we completed our first comprehensive materiality assessment to identify and prioritise the most critical environmental, social, and governance (ESG) issues facing the Hadley Group.



MATERIAL TOPIC KEY: **D** – Double material impact. **I** – Impact Material. **F** – Financially material.

Empowering Our People: Progress and Commitments

FOCUS AREA	2030 AMBITION (Our Commitment)	PERFORMANCE/KEY METRICS (Current Progress)	KEY ACTIONS TAKEN
Diversity, Equity & Inclusion (DEI)	To build a team that reflects the diversity of our customers, suppliers, and communities, while fostering an inclusive environment where every individual is proud to belong.	Percentage of women in management positions: 3% (UK) Percentage of ethnically diverse senior managers: 3% (UK)	Developed and implemented a Group-wide People Strategy . Incorporated a formal Group-wide DEI Policy to guide hiring, development, and retention.
Health and Safety	At Hadley Group we are committed to achieving Zero Harm, this means zero injuries . Everyone has the right to be safe at work and to return home to their family and friends as healthy as when they started the day. We therefore expect each person at Hadley Group to work safely. Whilst ensuring legal compliance, we seek to apply industry best occupational health safety and environment (OHS&E) practice for employees, contractors and customers.	2030 target to achieve a Total Incident Frequency Rate (TIFR) of < 50.0 per million hours, at the end of FY24/25 the Group TIFR was 44.1 and improved by 22.8% over the prior year and below the 2030 ambition.	Continued development and enhancement of our Health and Safety Programme, including targeted training, near miss and hazard reporting , comprehensive inspection program, expanded risk control and improved the management system ready for ISO45001 in FY25/26 . Ensure employee Health and Safety Training hours are aligned to best practice.
Community Enrichment	To encourage and increase employee volunteering, focusing resources to maximize positive, deep-seated impact within the communities we serve	A thriving social committee is now operational , actively supporting community enrichment programs to ensure maximum effectiveness.	Launched a Social Value Fund to allow for more targeted, profound, and impactful financial and non-financial support for our local communities.
Human Capital Development	To develop our people's potential and future-proof the business by establishing a culture of continuous learning and growth.	Talent development programme expanded. Learning and Development opportunities boosted across the Group.	Launched a learning academy to professionalise and improve learning and development. Initiated a formal management development programme . Refined the existing apprenticeship programme for optimal performance and career progression.



Employer of choice

At Hadley Group, we strive to be an employer of choice, creating an inclusive, dynamic and engaging environment where every individual is excited to contribute their best work.

Our core commitment is to be the first choice for our people. Our shared values, shaped by our employees, define how we collaborate and are essential to fostering a shared sense of purpose. This empowered culture is the engine that powers the delivery of our overall business strategy.

Our low employee turnover and length of service is a strong testament to Hadley being a great place to work.

Labour and Diversity: The Power of Inclusion

At Hadley Group, we are unequivocally an equal opportunity employer and firmly believe that diverse teams drive better outcomes. Our commitment is to foster a workplace where every individual feels respected, supported, and empowered to grow, attracting applicants from all backgrounds and identities.

Our recently incorporated **Diversity, Equity, and Inclusion (DEI) Policy** is not just a document; it defines **how we work, collaborate, and succeed**. This culture of openness, respect, and belonging is a key enabler for talent acquisition, allowing us to attract and retain top talent from a broad global pool. By harnessing a diverse range of strengths, we unlock new possibilities and ensure the strategic relevance of our Senior Leadership Team, which remains an area of continuous review and evolution.



“

I started at the Hadley Group in 2021 without any manufacturing experience, which as a new starter can be daunting! As well as having support from key colleagues to learn my day-to-day role, I was quickly enrolled on training courses to become an internal auditor for ISO:9001 and ISO:14001, both of which are critical in a manufacturing environment. In the last 18 months, I have been on a Level 5 Continuous Improvement apprenticeship, which has helped me develop my soft management skills in relation to undertaking projects, as well as project management on a wider scale, and lean manufacturing.

Whilst I had worked in management in my previous job roles, I started my apprenticeship at the same time as stepping into my first management role within the Hadley Group which helped me to apply my new knowledge and skills to real-world situations, as well as giving me new insights which I did not have available in my previous career.

The Hadley Group has provided me with a multitude of opportunities for continuous professional development, all of which has added to my skillset within my current role and has set me up for future success within the business.

Rosie Pendrey, Planning Manager

Investing in People and Community

We believe in supporting both our employees and the communities we serve.

Our people actively participate in a variety of volunteering activities, dedicating hours monthly to mentor young people and prepare them for the world of work through strategic support, employer engagement, and targeted interventions. This commitment adds significant positive value to the development of the next generation.

To support our team’s holistic health, all employees have access to our comprehensive Benefits Programme. This program is tailored to regional and package needs, covering physical, social, financial, and mental health. It includes a range of free, accessible support services and dedicated financial wellbeing resources.

Recognising that employee engagement is critical for retention and high performance in today's competitive market, we are committed to doing better. We are continuously enhancing our two-way listening approach and implementing new measures to gauge overall engagement levels. Our primary goal is to continuously improve employee satisfaction and motivation.



Learning Academy

- Heavily invested in the refurbishment and repurposing of our old Exhibition Room for the Learning Academy use
- Learning Academy has been fitted with state-of-the-art technology and facilities
- Facility opens for events at the start of October, and is solely for training and company events



Management Development Programme

- Being launched in October 2025
- 12 Managers across the business have been selected for our inaugural programme
- 18-month, blended learning programme. Contains workshops, development tools, practical tasks, and 1:1 coaching



Manager Strength Index (MSI)

- Invested in a project to understand people management capability within Hadley Group
- Assessments completed for over 70, UK based people managers
- Each manager has been provided with their own report highlighting their strengths and development



Performance Reviews

- Completed a performance review exercise
- All employees are given the opportunity to discuss their performance
- 93.6% completion as a business (UK)



Creation of DEI Calendar

- A calendar of events has been created in collaboration with the Social and Charity Committee
- Projects and articles planned for World Mental Health Day and Diwali throughout October
- Committed to arranging a minimum of 6 events throughout 2026



Full Apprenticeship Review

- Conducted a full audit of existing processes
- Implemented key changes to enhance our apprentice’s experience (new logbooks, SharePoint site, quarterly presentations)

Gender Pay Gap Summary

Our analysis of hourly earnings in April 2024 shows a mixed trend compared to the previous year.

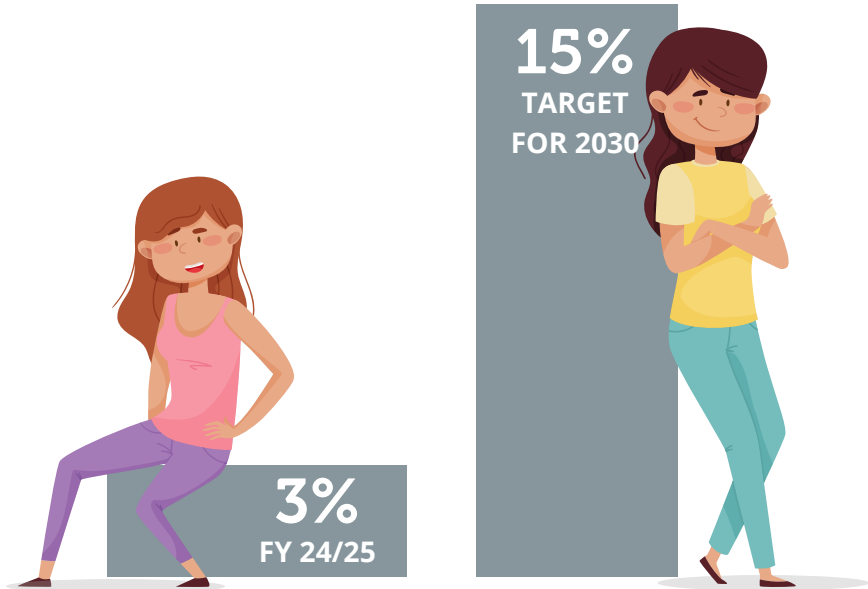
MEAN GENDER PAY GAP:

The **mean gender pay gap widened** over the last year, indicating a worsening disparity in average hourly earnings. The gap increased by **0.72 percentage points**, moving from female employees earning 3.26% less per hour than their male colleagues in April 2023 to **3.98% less** in April 2024.

MEDIAN GENDER PAY GAP (IMPROVEMENT):

Despite the widening mean gap, we have achieved positive progress in the middle of our pay distribution, as the **median gender pay gap has narrowed**. Female employees now earn 2.00% less per hour than their male colleagues, which is an **improvement** from the 2.11% difference reported previously, reflecting a **0.11 percentage point decrease** in the median pay disparity.

Women in leadership roles & talent development



OUR TARGET:

While we understand the challenges and realities of the sector we operate in, we are committed to achieving **15% women in leadership roles by 2030 across our global sites**.

Operating in a unique and competitive industry, we place a high strategic emphasis on recruiting, retaining, and developing top talent. Our talent management approach is continually evolving to ensure we have the essential skills and capabilities for both today and the future.

We drive performance by **investing in emerging talent** through dedicated development programs and utilising strategic reward and recognition.

To enhance our efficiency, we aim to achieve **10% more tonnage output per employee** (against an April 2022 baseline) through training, mechanisation, and automation. This focus on efficiency ensures job protection by **growing the competence and capabilities of our people**. Moreover, our enhanced learning and development programs are crucial for improving our sustainability culture and deepening employee engagement across the business.



“

“I have been worked at Hadley Group in Thailand for over 13 years and I have witnessed the company’s continuous commitment to people development and environmental excellence. Here in Thailand, we have organised various corporate social responsibility initiatives. We have also been actively involved in environmental projects hosted by our customers. Looking ahead, we plan to further encourage employee involvement in environmental and social initiatives, reinforcing our commitment to creating a positive and sustainable impact within the organisation and the wider communities we serve”

Patcharanut Mueangmo, Human Resources and Administrative Manager

Develop Skills Through Apprenticeships

Apprenticeship records include employees who are currently studying through a levy-funded programme.

RECORDS SUMMARY	
Total People on a live Levy-funded Programme	22
Total No. of Apprenticeship Providers	8
Total No. of Different Apprenticeship Courses	11
Total completions since May 2025	3
New registrations since May 2025	4

In addition, we have recently recruited five new apprentices in partnership with In-Comm. They are due to start their programme in Oct 2025 and will work in the following areas:

2x

BPD

(Production)

2x

CRD

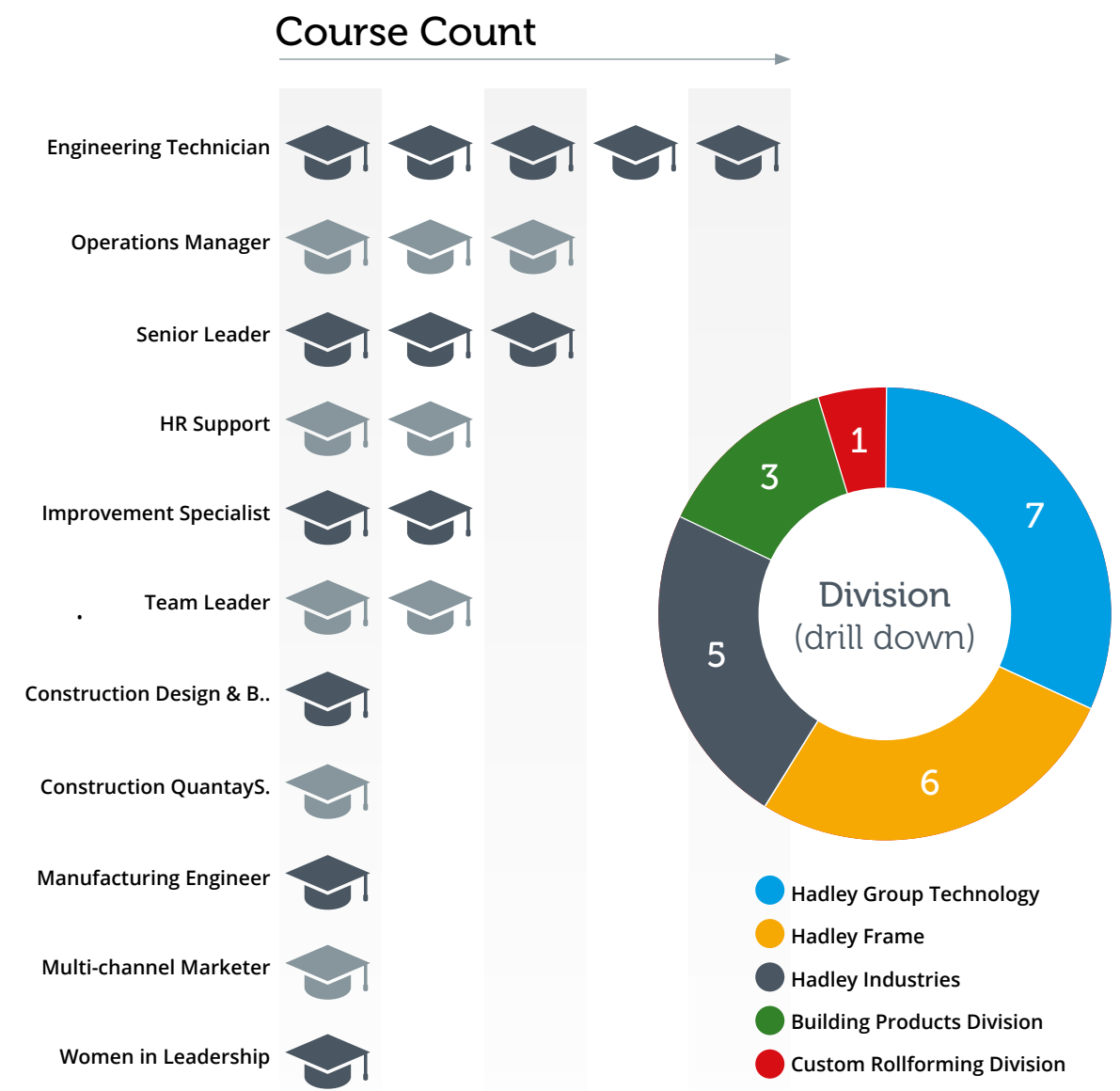
(Production)

1x

HGT

(Commissioning)

We are also launching a Level 3 Supervisor Programme in Dec 2025. Six aspiring / existing Supervisors will complete the in-house ILM Level 3 programme, delivered in partnership with In-Comm.



Community Enrichment

We are committed to championing our local communities by improving people’s lives and inspiring future generations.

We achieve this by **encouraging and empowering our employees** to make a direct difference through:

Our local
**Charitable
Giving Fund**

Targeted
**sponsorships and
partnerships**

Dedicated
**employee
volunteering**

All our community enrichment efforts are strategically supported and coordinated by our dedicated Charity and Social Committee, ensuring maximum impact.

Community Impact Snapshot

Our employees donated 56 hours of volunteering for the reporting period, working with the likes of:

Inspiring the Future, an education and employee’s charity with a focus on transformative initiatives that **connects students with professionals to broaden career aspirations.**

Windsor Olympus and Sandwell Academies, 4 hours monthly (academic year) of **employer engagement, pathway awareness and targeted intervention volunteering.**

We proudly sponsor the University of Wolverhampton Racing team and have done so since inception. **Our sponsorship has equipped several students with the education, skills and experience, right to the heart of British Motorsports.**

£75k

We donated £75,246.87 to local charities and community initiatives within the communities we serve in the UK

56 hrs

Our employees donated 56 hours of volunteering for the reporting period

We recognise the importance of making a tangible, **positive impact in our local communities.**

To ensure greater efficiency and accelerate this impact, we are launching a dedicated **Social Value Fund.**

This fund will streamline our fundraising efforts and provide a centralised, strategic approach to our charitable spending. Looking ahead to 2026, we will focus on implementing further **Social Impact Partnerships.** These partnerships will enhance our ability to improve lives, encourage greater employee volunteering, and help our people build new skills while supporting their communities.



Health and Safety

Health & Safety Summary for FY24/25 Sustainability Report

This summary outlines the Health & Safety (H&S) performance for FY24/25, highlighting progress towards our **“Zero Harm”** vision performance against our Total Incident Frequency Rate (TIFR) target, key safety programs, and the strategic focus for FY25/26.



FY24/25 Performance and TIFR Achievement

The Group achieved a significant overall reduction in accident frequency and severity during FY24/25, reflecting an improvement in safety culture and management system.

- **Total Incident Frequency Rate (TIFR):** The Group's TIFR for FY24/25 was **44.1** per million hours worked and below the 2030 target.
- **Performance:** We achieved a **substantial 22.8% year-on-year reduction** from the previous financial year. However, this figure did not meet our internal target of <= 42.9.
- **2030 Target:** The FY24/25 actual TIFR of **44.1 is already below the long-term goal of <50.0**, against the 65.4 baseline set in April 2022.
- **Accident Trends:** Total accidents decreased by **10%** (from 70 to 63). Major accidents also reduced by **9.1%** (10 vs. 11), with a corresponding reduction in the severity of harm.

Safety Critical Programs (The Critical 3)

The H&S investment strategy focuses on the Critical 3 major risk areas to engineer out risk8.

- **FY24/25 Critical Risks:**
 - 1. Line Improvement:** Program to engineer out legacy workarounds, improve machinery guarding, access, and isolation of power sources.
 - 2. Pedestrian Safety (PED SEG):** Aimed at segregating pedestrians from vehicles to address the highest risk factor on sites.
 - 3. Site Rules & Compliance:** Aimed at improving the Safety Management System (SMS) to define clear policies and procedures, with a view to attaining **ISO45001 certification**.
- **Strategic Shift for FY25/26:** Effective FY25/26, the third critical risk focus is changing to **“Cuts to Hands”** to drive renewed attention on hand injury prevention. The “Site Rules & Compliance” objective will now form part of the ISO45001 UK manufacturing sites project.

Training and Competency Highlights

We delivered significant training programs to enhance employee competency and **safety knowledge**:

- **eLearning:** **1,679** safety-related eLearning courses were completed across the Group.
- **Job Safety Analysis (JSA):** **524** Job Safety Analysis sessions were delivered to improve risk identification and control, particularly in the UK and HIME.
- **Compliance:** An enhanced focus was placed on competency-based training, succession planning, and improving the reporting culture.

Focus and Objectives for FY25/26

Our strategy for the next financial year is focused on delivering key projects and improving safety leadership:

- **Critical Risk Investment:** We will continue the **Critical 3** investments with a renewed and specific focus on **hand injury prevention**.
- **Certification Project:** A major objective is to deliver the **ISO45001 certification project** for UK manufacturing sites.
- **Culture and Leadership:** We aim to improve the reporting culture and safety leadership, specifically in underperforming business units.

Our Environment, Our Responsibility: Commitments and Progress

FOCUS AREA	2030 AMBITION (Our Commitment)	PERFORMANCE/KEY METRICS (Current Progress)	KEY ACTIONS TAKEN
Carbon Emissions	Progressively cut our carbon emissions across all Scopes by 2030 , and beyond.	Achieved 1,142tCO2e in emission reduction across Scopes 1 and 2.	Transition to sustainable alternative fuel, energy efficiency programmes (HVAC retrofit and upgrades). We are currently revalidating our Scope 3 emissions for credible target setting.
Circularity and Waste	Reduce, reuse, and recycle our waste to achieve zero waste to landfill in our direct operations, where services are available across our global operations.	Zero waste to landfill status maintained in direct operations in the UK and NL.	Implementing shared learning and best practices across all sites for enhanced recycling and good housekeeping to drive operational efficiency.
Products and Transportation	Decisively reduce emissions from product transportation. Leverage innovation and technology to develop new low-carbon products.	Achieved a 27% emission reduction contribution from the transition of our transport fleet. Optimised design processes to achieve material content reduction by up to 40% in key products.	Completed the full transition from diesel to HVO (Hydrotreated Vegetable Oil). Optimising transportation routes to reduce road miles and improve fuel efficiency. Exploring the use of sustainable tyres for the fleet. Working closely with customers and supply chain partners to enable the adoption of low-carbon processes. Innovating and embedding smart processes into our manufacturing approaches.
Supplier Sustainability	Commit to engaging 100% of suppliers on sustainability by 2030, creating a collaborative ecosystem with key partners.	Audited the top 90% of direct suppliers by spend figure on sustainability practices in 2025. Engaged the Top 5 key supply chain partners in 2025.	Introduced Sustainability as a key strategic topic in our supplier approach. Developed a Sustainability Assessment Questionnaire for auditing and deepening engagement with partners.



Decarbonisation & Energy Efficiency

Climate action is an important strategic element of our sustainability ambition.

As a critical partner to the global industrial sector, we recognise our role in driving change. We have set ourselves ambitious, long-term goals to decarbonise operations, efficiently manage resources, and ensure our assets are resilient to climate change risks.

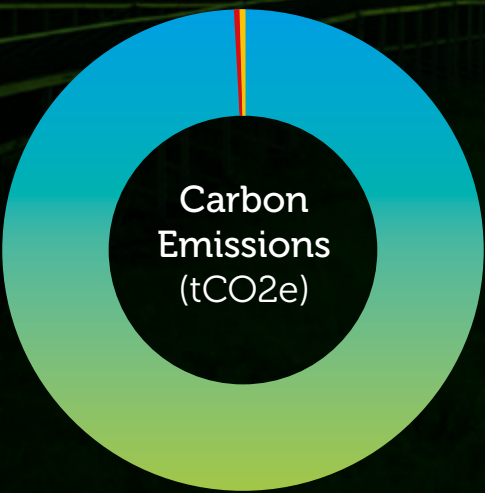
We are delivering impact by developing sustainable products, championing greener distribution, and optimising our manufacturing processes, creating positive influence for our customers and suppliers.

Significant Progress in Operational Emissions (Scopes 1 & 2)

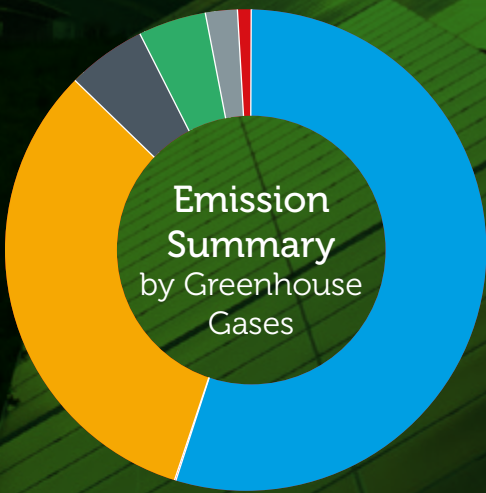
In 2024/2025, we made great progress towards reducing our direct operational carbon footprint, achieving 1,142tCO2e of emission reduction across Scopes 1 and 2 emissions, a significant boost against our 2030 operational emission reduction target of 40%.

This success was primarily driven by:

- **The full transition to Sustainable Alternative Fuels** in our fleet following a successful trial, significantly cutting transportation emissions.
- **Optimising and upgrading building services** for increased energy efficiency.



- Scope 1
- Scope 2
- Scope 3



- CO²
- CO²e
- CH⁴
- CO²e (other gases)
- N²O
- Other

Green Energy Leadership

We are committed to green energy sourcing. All energy procurement for our UK and Netherlands operations comes entirely from certified green energy sources.

In 2025, we introduced clean energy self-generation at our Ede, Netherlands site with a **216-panel installation generating 97.2kWp**. We plan to expand this portfolio, with a **700kWp solar panel installation** proposed for our Smethwick site.

Complementing these initiatives, systematic electrification and expansion of our **clean energy power generation** will be essential decarbonisation levers moving forward.

Water and Water Protection

Water in used in our operations such as building services and production. Across our operations, a total of 7694 cubic meters of water was used during our reporting period

We comply with local laws on water usage and protection and encourage our people on best practises. A key objective in relation to using resources efficiently is water management. We aim to monitor more closely and reduce our consumption, as well as the managing discharges well. We will continue to ensure careful handling of hazardous substances to water and build our resilience to appropriate leakage protection.

DECARBONISATION LEVERS	EMISSION SCOPE
Renewable Energy	Scopes 1 and 2
Sustainable Alternative Fuels	Scopes 1 and 2
Optimised Building Energy Management	Scopes 1 and 2
Building Services Upgrade	Scopes 1 and 2
Transition to Low Carbon Steel	Scope 3
Value Chain Collaboration and Engagement	Scope 3

Waste and Circularity: From Management of Circular Economy

Our commitment to a greener operation begins with reducing, reusing, and recycling waste across all sites.

Effectively managing our waste is the critical first step in our broader circular economy ambitions. Over the years, our improved waste standards and stringent policies have driven significant progress in our global resource usage, ensuring we consistently divert valuable resources from landfill, where available in the regions we operate.

Our key commitments by 2030 include:

- > Maintaining **zero waste to landfill** status in direct operations, where available in regions we operate
- > Aiming for **95% recycled production waste by weight**
- > Continuously decreasing our **waste intensity** year-on-year.
- > Increasing the **proportion of waste recycled or reused**
- > Sourcing raw materials with the **highest viable recycled content**



Embedding Circularity for the Future

Embedding circularity across our entire operation is a top environmental priority.

We are developing strategic approaches, including integrating circular principles into our value chain, prioritising localised supply chains where possible, and **designing products for lifespan extension** and maximum resource recovery.



“

At Hadley Group, sustainability is embedded in how we operate, from the way we engage with customers to the technology we invest in. Within our sales organisation, sustainability has become a key commercial driver. Our teams work closely with customers to redesign existing or planned components to make them thinner, lighter, and more sustainable. Pursuing “greener by design” ultimately generates the most positive impact, so we start there. By integrating high-strength steels and introducing green-steel alternatives into our product portfolio, we actively help reduce our customers’ embedded carbon emissions without compromising performance or cost competitiveness. Sustainability now runs as a red thread through the RFQ process, standing alongside value add, quality, price, strategy, and lead time as a decisive factor in our commercial success.

Beyond the commercial interface, we continue to invest in reducing our own environmental footprint. We have completed phase one of our solar roof installation, expanded EV charging infrastructure, and commissioned three new energy-efficient laser welding systems. Our Dutch site also benefits from geothermal heating and cooling, further reducing our dependency on conventional energy sources. These steps, combined with insights gained from customer engagement, help us shape our policies and align our actions with the wider market’s expectations. At Hadley Group, sustainability is not an aspiration, it is a measurable, ongoing commitment woven into our daily operations and long-term growth strategy.

Johnny Jager, Sales Director, Europe

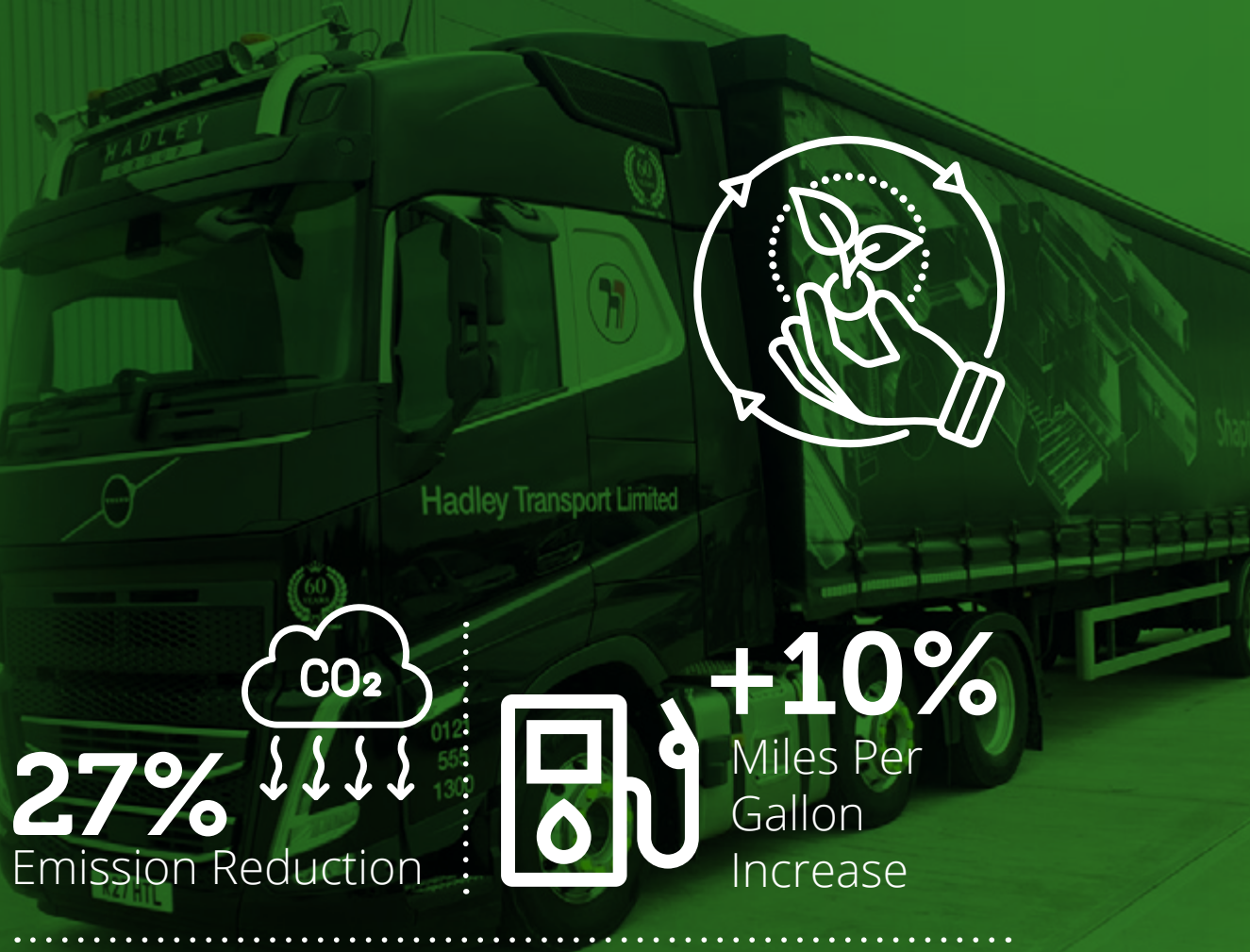
Greening Our Value Chain

As part of our strategic efforts to significantly reduce our value chain greenhouse gas emissions and improve our environmental performance, we transitioned from diesel to sustainable alternative fuels, with an initial focus on transportation and logistics segments of the value chain.

Following a successful trial phase in 2023, we made a full transition in 2024, and we are now seeing benefits such as supply chain resilience, enhanced brand reputation, regulatory compliance and emission reduction.

Transition Impact

We recognise that greening our value chain extends beyond transitioning from diesel to sustainable alternative fuels, and this is why we are promoting circular economy and resource efficiency and prioritising further supply chain decarbonisation with a focus on supplier engagement and logistics optimisation.



984tCO₂e

Carbon Reduction (equivalent of 45 fully laden Hadley Transport Trucks)



“

“We work collaboratively with our customers during early product development and feasibility assessments with sustainability in mind. This allows us to offer optimised design proposals which are both more efficient in terms of material usage, but also for our manufacturing process.

We recently developed a new fencing profile design with a client that saved over 40% material content from their original concept without compromising structural performance. The initial design would have also required double the tooling investment and tooling steel, and likely resulted in significantly more production scrap, so it was a clear win-win.

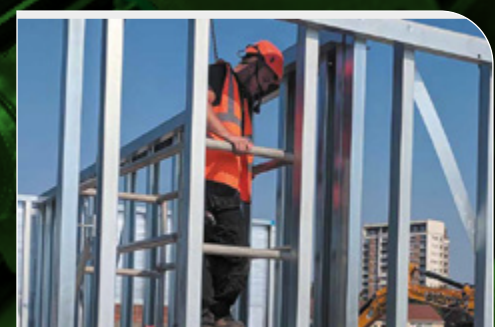
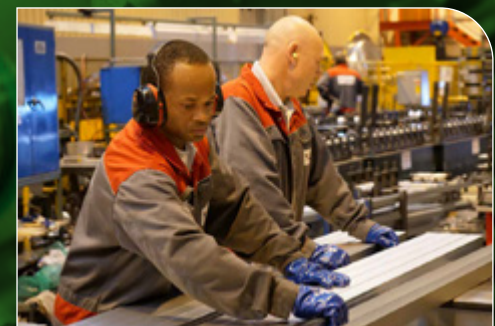
Other notable sustainable considerations into our product design process include converting customers from aluminium extruded products, to roll formed steel profiles. Aluminium production embodies significantly more CO₂ than Steel (7-15 times more), and we are often able to reduce material content at the same time, since aluminium products are limited by how thin they can be extruded

Dr. Martin English,
Director of Technology

Sustainable Products

Hadley Group is committed to transparency about our environmental and responsible practises in building a sustained customer relationship and driving customer value through sustainable products.

Our customers and suppliers are committed to sustainability and working with partners who share the same value as us is important.





Governing with Integrity

FOCUS AREA	2030 AMBITION (Our Commitment)	PERFORMANCE HIGHLIGHTS	KEY ACTIONS AND INITIATIVES
Responsible Supply Chain	To evaluate all suppliers against our ethical and environmental standards and set clear sustainability objectives for strategic partners.	Audited the Top 10 direct suppliers by spend figure for their sustainability practices.	Developed a formal Sustainability Assessment Questionnaire for partners. Updated our Sustainability Supplier Handbook and policy documents . Increasing engagement with suppliers to simplify complexities and increase purchasing volume from those demonstrating credible environmental credentials.
Responsible Governance	To embed sustainability targets into our employee reward program and governance structure.	Ongoing efforts to integrate sustainability targets into incentive schemes.	Exploring an incentivised approach for employees to help achieve our Scope 1 and 2 emission reduction targets. Mandating Group wide training on anti-bribery and anti-corruption .
Transparency and Accountability	Enhanced sustainability reporting, aligning to more standards and frameworks Fully integrating all Group operations into sustainability reporting	Aligned sustainability reporting to recognised and reputable global standards and frameworks	For effective monitoring, reporting and evaluation of progress towards sustainability goals, Hadley Group has adopted the Global Reporting Index (GRI) reporting standards and has continued to enhance its ECOVADIS submissions 100% response rate to all supplier sustainability request.

Board and Executive Oversight

Our Board of Directors, led by the Group Managing Director, holds ultimate responsibility for the development, delivery, and progress of the strategy.

The Board oversees the creation and implementation of all related action plans, policies, goals, investments, and public disclosures, ensuring strategic alignment across the Group.

STRATEGIC REVIEW AND DIRECTION

The **Senior Leadership Team (SLT)** receives monthly updates on performance and progress. Dedicated time is allocated during Board meetings to review strategy, investment planning, and management processes. This is supplemented by continuous briefings and updates on the latest sustainability regulations and developments, ensuring proactive strategic positioning.

EXECUTION AND DELIVERY

The **Group's Sustainability Team** is responsible for the daily strategic delivery of the programme. This team is supported by cross-organisational steering and committees focused on key areas across the three pillars of sustainability.

These teams meet regularly to develop strategic plans, oversee initiative delivery, and manage ongoing performance. To further strengthen our structure, a **Sustainability Compliance and Initiatives Steering Committee** is currently being constituted to support the team's goals. We also actively monitor the evolving sustainability disclosure landscape across all our geographical regions to ensure comprehensive compliance with the latest requirements.

Compliance with Tax Legislation

Responsible tax compliance is a cornerstone of our corporate governance. It demonstrates our commitment to make a social contribution across the jurisdictions we operate in. We view the payment of taxes as not merely a legal obligation, but an essential and direct contribution to fund the public services and infrastructure of our host communities globally.

Our strategy is built on strict compliance with all relevant national and international tax laws, ensuring our tax affairs are managed ethically, accurately and sustainably. We maintain a robust internal control system and a commitment to tax transparency. This approach reinforces our identity as a responsible corporate entity dedicated to a long term value creation for all stakeholders.

Key tax, compliance, risk and related matters are presented to, and approved by our Group Finance Director.



Governance Framework for Sustainability-Related Matters



Ethics and Compliance: Upholding the Highest Standards

Hadley Group is committed to upholding the highest standards of ethics and compliance across all our operations and we require the same adherence from our suppliers.

Our key policies, standards, and processes are aligned with the legislative requirements and best practices across every region in which we operate.

COMPLIANCE AREA	OUR COMMITMENT AND POLICY
Code of Conduct	Our Code sets the policy for maintaining the highest standards of ethical conduct and behaviour for all employees. Compliance is mandatory, supported by dedicated training for senior managers and awareness campaigns for the entire workforce.
Anti-bribery and Anti-corruption	We maintain a strict zero-tolerance policy toward bribery and corruption. All employees are required to complete regular ethics and compliance training. We are dedicated to enforcing robust measures that prevent, monitor, and uphold our stance against all corrupt practices.
Whistleblowing	We provide a dedicated, secure Whistleblowing process for employees, customers, and suppliers to raise ethical or legal concerns without fear of reprisal or victimisation . Globally, we offer both internal channels and an external reporting service that supports anonymous disclosures.
Modern Slavery	Our Modern Slavery Policy outlines our zero-tolerance standpoint against any form of slavery, forced or child labour, and human trafficking in our operations and supply chain.
Human Rights	Hadley Group's comprehensive Human Rights Policy Statement defines our approach to respecting human rights, developed in line with the fundamental principles of the International Labour Organisation (ILO) Declaration . Our human rights due diligence prioritises assessing potential and actual impacts where they are most severe, focusing on our activities and business relationships. Policy implementation and governance are led from the top, ensuring responsibility is integrated across all parts of our global business.

Supply Chain Governance: Strategic Sustainable Procurement

Hadley Group views its supply chain as a critical area for accelerating sustainability and promoting sustainable procurement as a core business consideration.

We work in close collaboration with our partners, clearly defining our sustainability requirements and supporting their journey to meet these standards.

Our strategic commitment is evident in the implementation of our **supplier sustainability survey** earlier this year, a testament to our desire to green our entire supply chain. Recognising the diverse maturity levels across our hundreds of suppliers, we employ **targeted tools and direct engagement** to address concerns and identify specific actions that enhance their sustainability position.

This collaborative approach strengthens our **sustainability risk management** and accelerates progress across our entire value chain. There are no negative environmental impacts across our value chain for the disclosure period.

OUR 2030 AMBITIONS


Evaluate **all suppliers** against our environmental and ethical standards



Set clear **sustainability objectives** for all strategic partners



Increase our **purchasing volume** from certified or audited strategic suppliers



Quantify and report on our spending on **local suppliers**



To ensure a resilient and sustainable procurement process, we will continually improve our supplier code, procurement policies, and screening tools for both existing and new suppliers, aligning them with local and regional statutory requirements.

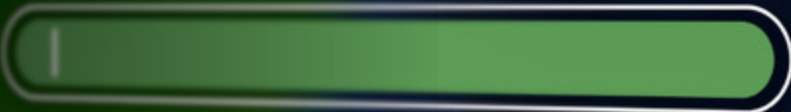
Reporting and Disclosure

We are committed to transparency and meeting the evolving demands of our stakeholders and the regulatory landscape. We continually align our sustainability reporting to key global frameworks, ratings, and standards.

Our methodology for calculating key sustainability KPIs is detailed within this report, and the **assurance of our sustainability metrics from CM Environmental** can be found in our Annual Report and Accounts (ARA) on pages 6-12.

Recognising the need for continuous improvement, we are actively engaged in peer-learning initiatives. We have joined various sector and non-sector working groups and committees focused on **Sustainability Reporting, Circular Economy, and Climate Action**. This engagement allows us to benefit from peer experience and gain strategic insights on our most material topics.

Our sustainability disclosure is currently aligned to the GRI standard, with considerations for sector-specific recommendations. This will enhance transparency and credibility and help to boost stakeholder engagement and trusts. It will also move us away from simply having sustainability goals to effectively measuring and communicating true impact.



Sustainability

Data, Information Security and Privacy

Our governance framework sets the overarching vision and policies for Information and Communication Technology (ICT), clearly defining responsibility for data security and privacy.

As part of our wider information security program, we continuously assess various parts of our business for risks associated with handling personal data, taking prompt action where improvements are needed.

With data and information security gaining relevance, we maintain a strong, proactive focus in this area. We are implementing a phased, multi-year program to roll out a standardised **Enterprise Resource Planning (ERP) system** across our global operations. This is central to our digitalisation ambition and will significantly **strengthen data consolidation and security**. All confirmed or suspected data breaches must be immediately reported to the IT Service Desk via a dedicated line or email.

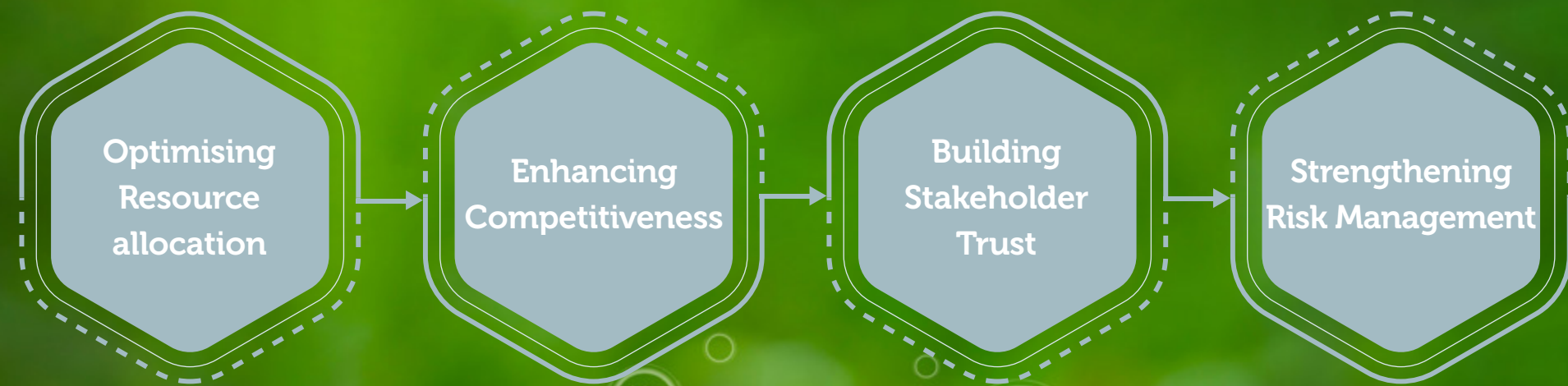
We uphold the **privacy and confidentiality** of our colleagues, customers, and suppliers, adhering to all legal and ethical considerations. Our privacy policy statement dictates the appropriate use of data.

To ensure continuous improvement, we conduct **regular risk-based analysis** to inform key focus areas. All employees complete cyber security training, and it is refreshed every two years, with additional specialised training provided to those in higher risk roles.



At Hadley Group, sustainability is more than just a compliance obligation; it is a fundamental driver of business success and resilience.

Our commitment is strategically focused on delivering key outcomes, including:



Appendix

GRI Standards Disclosure Index

Application Statement – Hadley Group has reported the information contained in this GRI index for the period May 31st, 2024 to April 30th, 2025, with reference to the 2021 GRI Universal Standards (GRI 1, 2 and 3).

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
GR 1: Foundation 2021		
GR2: General Disclosures 2021		
The organisation and its reporting practises	3, 4, 13, 15, 38, 43	
2-1: Organisational details	3	Hadley Group is an unlisted family business and the parent company of Hadley Industries Holding Limited.
2-2 Entities included in the organisation’s sustainability reporting	3	
2-3 Reporting period, reporting frequency and contact person	56	
2-4 Correction or restatements of information		
2-5 External assurance	54	
Activities and workers		
2-6 Activities, value chain, and other business relationships	36, 37, 38, 42	
2-7 Salaried employees		Hadley Group cannot provide a breakdown of employees by employment contract and relationships at this point. As we continue to enhance the data we collect and the ease of collecting this data through the migration to a more sophisticated system, we will be in a better position to provide the breakdown of data into the required categories for the purpose of future reporting obligation.
2-8 Workers who are not salaried employees		Hadley Group cannot provide a breakdown of employees by employment contract and relationships at this point. As we continue to enhance the data we collect and the ease of collecting this data through the migration to a more sophisticated system, we will be in a better position to provide the breakdown of data into the required categories for the purpose of future reporting obligation.
Corporate Governance		
2-9 Governance structure and composition	15, 40, 41	
2-10 Nomination and selection of the highest governance body	15, 40, 41	
2-14 Role of the highest governance body in sustainability reporting	15, 40, 41	

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
Strategy, policies and practises		
2-22 Application statement on sustainable development strategy	10, 16, 17	
2-23 Statement on commitment to policy and conduct	8, 13, 14, 21, 31, 38, 41	Hadley Group cannot provide a breakdown of employees by employment contract and relationships at this point. As we continue to enhance the data we collect and the ease of collecting this data through the migration to a more sophisticated system, we will be in a better position to provide the breakdown of data into the required categories for the purpose of future reporting obligation.
2-25 Processes to remediate negative impacts	13, 14, 41	
2-26 Mechanisms for seeking advice and raising concerns	39, 40, 41	Hadley Group cannot provide a breakdown of employees by employment contract and relationships at this point. As we continue to enhance the data we collect and the ease of collecting this data through the migration to a more sophisticated system, we will be in a better position to provide the breakdown of data into the required categories for the purpose of future reporting obligation.
2-27 Compliance with laws and regulations	21, 30, 34	
2-28 Memberships in associations and interest groups	55	
Stakeholder Engagement	4, 10,1 8, 39, 41, 42	
Activities and workers		
2-29 Approach to stakeholder engagement	4, 8, 11, 13, 18, 21, 29, 37, 41, 42	
2-30 Collective bargaining agreements		
GRI 3: Material Topics 2021		
3-1 Process to determine material topics	18, 19	
3-2 List of material topics	20	
3-3 Management of material topics	20	
GRI 201: Economic performance 2016		
201-2 Financial implications of climate change for the organisation and other risks and opportunities due to climate change		For this disclosure, Hadley Group has not quantified the financial implications of climate change for the organisation and other risks and opportunities. We plan to undertake a climate risk advisory service in Fy 25/26, and this will lead into a financial quantification of climate change for the organisation
GRI 204: Procurement practises 2016		
3-3 Management of material topics	41, 42	

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
204-1 Proportion of spending on local suppliers	41, 42	We have not included this figure for this disclosure however it forms a core part of the objectives in our new roadmap to 2030. A proportion spend will be included in the disclosure for FY 25/26
GRI 205: Anti-corruption		
3-3 Management of material topics	39, 40, 41	
205-1 Operations assessed for risks related to corruption		A specific risk related corruption assessment was not carried out for this reporting period.
205-2 Communication and training about anti-corruption policies and procedures	40	All governing body members and employees have been trained on anti-corruption
GRI 207: Tax 2019		
3-3 Management of material topics	39	
207-1 Approach to tax	39	
207-2 Tax governance, control and risk management	39	
207-3 Stakeholder engagement and management of concerns related to tax	39	
GRI 301: Materials 2016		
3-3 Management of material topics	34, 35, 37	
301-2 Recycled input materials used	34, 35, 37	
GRI 302: Energy 2016		
3-3 Management of material topics	32, 33	
302-1 Energy consumption within the organisation	32, 52	
302-3 Energy intensity	32, 52	
302-4 Reduction of energy consumption	32, 52	
GRI 303 Water and wastewater 2018		
3-3 management of material topics	32	
303-1 Interactions with water as a shared resource	32	
303-2 Management of water discharge-related impacts	32	We have not accounted for water discharge related impacts for this disclosure period.
303-3 Water withdrawal	32, 52	

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
303-4 Water discharge		We did not account for water discharge for this reporting period
303-5 Water consumption	32, 52	
GRI 305: Emissions 2016		
3-3 Management of material topics	32, 34	
305-1 Direct GHG emissions (Scope1)	32, 34, 52	
305-2 Indirect energy-related GHG emissions (Scope 2)	32, 34, 52	
305-3 Other indirect GHG emissions (Scope 3)	32, 34, 52	
305-4 Intensity of greenhouse gas emissions	32, 34, 52	
305-5 Reduction of greenhouse gas emissions	32, 34, 52	
GRI 306: Waste 2020		
3-3 Management of material topics	34, 35, 36	
306-1 Waste generation and significant waste-related impacts	34, 35, 36, 52	
306-2 Management of significant waste-related impacts	34, 35, 36, 52	
306-3 Waste generated	52	
306-4 Waste diverted from disposal	52	
306-5 Waste directed to disposal	52	
GRI 308: Supplier environmental assessment 2016		
3-3 Management of material topics	41	
308-1 New suppliers that were screened using environmental criteria	41	
308-2 Negative environmental impacts in the supply chain and measures taken	41	No negative environmental impacts across the supply chain for the disclosure period
GRI 401: Employment 2016		
3-3 Management of material topics		
401-1 New employee hires and employee fluctuation	22, 23	Definition of employee fluctuation rate: employees who leave the organisation voluntarily through retirement, redundancy, or death.

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
401-2 Benefits provided to full-time employees that are not provided to temporary or part time employees	24	
GRI 402: Labour/management relations 2016		
402-1 Minimum notice periods regarding operational changes		
GRI 403 Occupational health and safety 2018		
3-3 Management of material topics	30	
403-1 Occupational health and safety management system	30	
403-2 Hazard identification, risk assessment and incident investigation	30	
403-3 Occupational health services	10, 30	
403-4 Worker participation, consultation, and communication on safety and health in the workplace	30	
403-5 Worker training on safety and health in the workplace	30	
403-6 Promotion of worker health	30	
403-7 Prevention and mitigation of occupational health and safety impacts directly linked to business relationships.	30	
403-8 Workers covered by an occupational health and safety management system	30	
403-9 Work-related injuries	13, 30	All our production sites are covered by an externally audited health and safety management systems.
GRI 404: Training and education 2016		
3-3 Management of material topics	21, 26, 27	
404-1 Average hours of training per year per employee	21, 22, 26, 27, 28	
GRI 405: Diversity and equal opportunities 2016		
3-3 Management of material topics	23	

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
405-1 Diversity of governance bodies and employees	23	No personal information is provided about the Supervisory Board members for confidentiality.
GRI 408: Child labour 2016		
3-3 Management of material topics	41	
408-1 Operations and suppliers at significant risk for incidents of child labour	41	
GRI 409: Forced or compulsory labour 2016		
3-3 Management of material topics	41	
409-1 Operations and suppliers at significant risk for incidents of forced labour		We have just developed a risk assessment process and the first assessment carried out falls outside the disclosure period.
GRI 412 Human rights 2016		
412-1 operations that have been subject to human right reviews or impact assessment	41	All our sites have been subject to human right reviews and impact assessment, with the most recent impact assessment conducted in August 2025.
GRI 413: Local communities 2016		
413-1 Operations with local community engagement, impact assessments and development programmes	28, 29	
GRI 414: Supplier social assessment 2016		
3-3 Management of material topics	41	
414-1 New suppliers that were screened using social criteria	41	
415-2 Negative social impacts in the supply chain and measures taken	41	
GRI 416: Customer health and safety 2016		
3-3 Management of material topics	30	
Assessment of the health and safety impacts of product and service categories	30, 37	A proportion of the product and service categories whose health and safety impacts have been reviewed for improvement potential cannot be reported at present.

Disclosure Supplements

Environmental Data

CLIMATE CHANGE (TCO2E)		
Scope 1	Scope 2	Scope 3
1,439	1,729	675,092

WATER CONSUMPTION (CUBIC METRES)	7,694
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WASTE GENERATED (KILOGRAMMES)	
Incinerated Waste	197,591
Composted Waste	4,820
Mixed Recycling	4,530,456
Waste to landfill*	0
Waste to landfill	27,690

*UK and Netherlands sites.

ENERGY AND ENVIRONMENTAL MANAGEMENT	
Manufacturing sites with ISO 14001	3
Manufacturing sites with BES 6001	3
Manufacturing sites for where environmental risk assessment has been conducted	7
Sites with Ecovadis Rating	2

ENERGY CONSUMPTION WITHIN THE ORGANISATION (KWH)		
Electricity	7,537,897	
Gas	5,474,630	
Self-generation of energy (Netherlands)	Solar	97.2kWp
Renewable electricity purchased (UK and Netherlands)	4,670,562	

Community

TOTAL CASH AND IN-KIND DONATIONS*	£75,246.87
PERCENTAGE OF STAFF VOLUNTEERING	1.52

*UK Operations only

Health and Safety

TOTAL INCIDENT FREQUENCY RATE (TIFR)	44.1 per million hours
TOTAL ACCIDENT	63
MAJOR ACCIDENT	10

Carbon Emission Methodology Notes

Key Assumptions

This section outlines the critical assumptions and methodological considerations made in the quantification of Hadley Group’s Greenhouse Gas inventory for the reporting period May 2024 to April 2025.

General and Boundary Assumptions Organisational Boundary – The operational control approach has been applied. This means we account for 100% of emissions from operations where Hadley Group holds operational control.

Base Year – The base year for comparison is 2023/2024. Emissions for this year will be recalculated if any significant structural and operational changes occur in the future to maintain consistency.

Reporting Standard – The inventory is prepared in accordance with the GHG Protocol Corporate Accounting and Reporting Standard.

Scope 1 and 2 Assumptions

Manufacturing Process Emissions – It is assumed that there are no material non-energy related process emissions in our manufacturing process. Refrigerant Leaks – Fugitive emissions are calculated using the mass balance approach based on the quantity of top-up refrigerant purchased during the year, assuming the purchased volumes equals the volume leaked.

Scope 2 (Electricity) Calculation – We report both location and market-based Scope 2 emissions. Fuel Combustion Data – Fuel consumption data for stationary sources and mobile sources are based on primary records (supplier invoices and meter readings). Where primary data was unavailable for minor periods, consumption was extrapolated based on the average daily consumption of the preceding three months.

Scope 3 Assumptions

Purchased Goods and Services – Where primary data (supplier specific emission factors) was unavailable, emissions are calculated using the spend-based method, applying average emission factors to the annual financial spend data for that category.

Capital Goods – Emissions for newly purchased manufacturing equipment are amortised over the assumed useful life of the asset for the purpose of this report.

Employee Commuting – Emissions are calculated using an average round trip distance and transport mode split to model the entire year’s commuting emissions.

Upstream Transportation – For materials transported by third part carriers, emissions are estimated using the distance-based method, utilising estimated average vehicle type, load factor, and distance data.

Data Verification and Limited Assurance Statement

In addition to the statutory audit of the consolidated financial statements, an independent environmental auditor conducted a verification of our Sustainability KPIs. The auditor did not participate in preparing this data or in the broader financial disclosures within this report.

The purpose of this assurance was to ensure the information conveyed to stakeholders and other interested parties is accurate and supported by appropriate documented evidence.

Based on the procedures followed by CM Environmental during this independent verification exercise, there has been no evidence that the data supplied for the Hadley Group’s sustainability report for the period of May 1st 2024 to April 30th 2025, has not been obtained on a reliable basis, that the information is not adequately presented, or that significant deviations or omissions exist.

Christine Morris

For and on behalf of CM Environmental
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Sustainability Achievements, Ratings and Standards

External frameworks & standards we align to:



2024/2025 Sustainability Ratings:



Membership of Association:



2024/2025 Sustainability Awards and Recognition for Excellence:



For further information about our alignment and progress against these standards, please contact – sustainability@hadleygroup.com



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Editorial / Concept and Design

Publication Date: November 2025

Next Publication: FY 25/26

