Shaping the Future in Metal

Sustainability Report FY25/26

HADLEY GREEN

60 yrs

Engineering expertise and innovation to deliver proven solutions, building a legacy of trust with customers

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Who Are We

Founded in 1964, Hadley Group is a privately owned global engineering and manufacturing leader, recognised worldwide for excellence in cold roll forming technology and structural steel components.

With a strategic manufacturing footprint spanning the UK, UAE, Netherlands, and Thailand—alongside a dynamic Joint Venture in the USA—we partner with global industries to deliver high-performance, precision-engineered solutions.

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,**

Manufacturing for a **Sustainable Future**

At Hadley Group, sustainability is not a secondary objective; it is fundamental to our operational DNA and central to our long-term growth strategy.

We balance commercial success with a deep commitment to environmental stewardship and community wellbeing.
Our market-leading technologies, including advanced cold roll forming and our proprietary UltraSTEEL® manufacturing process, are intentionally engineered to enhance the structural performance of steel profiles while reducing material weight.

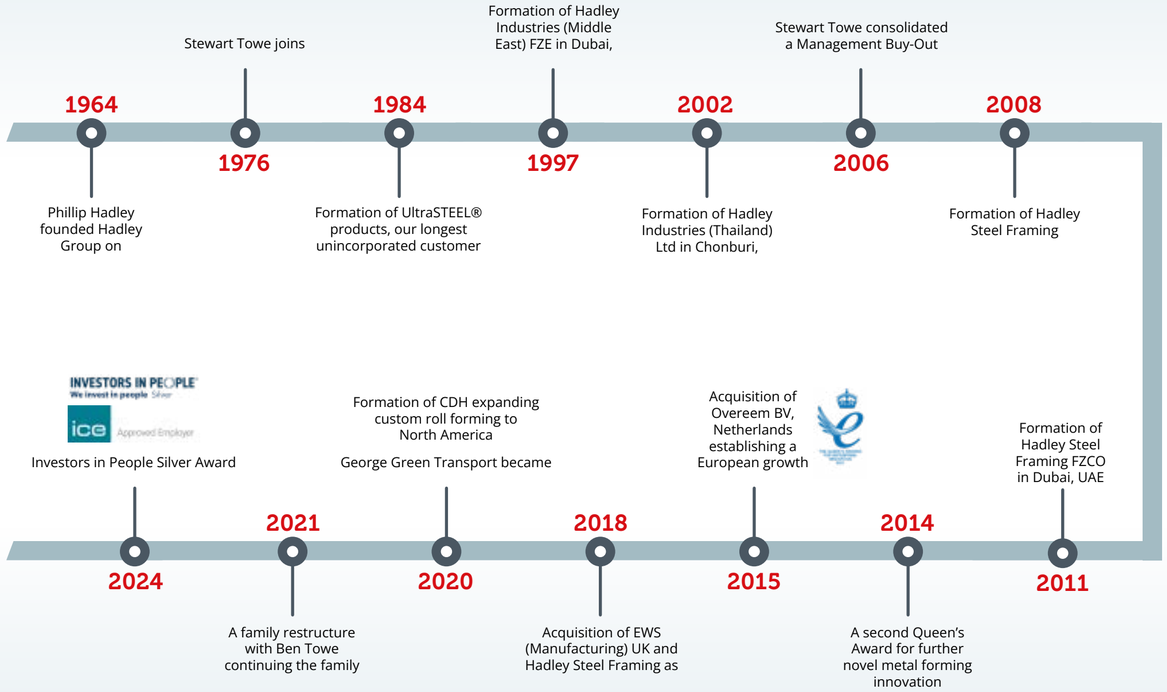
Backed by intensive in-house research and development (R&D)—including the custom design and construction of our own rolling machinery and tooling—our structural engineering teams focus on:

Optimising Resource Efficiency
Minimising raw material consumption across the product lifecycle

Eliminating Operational Waste
Driving lean manufacturing principles from tool design to final production

Accelerating Sustainable Development
Delivering high-quality, innovative products that help our customers reduce their own carbon footprints.

The Hadley Group timeline



Our Approach to **Sustainability**

At Hadley Group, sustainability is influencing our business decisions and is fundamental to how we operate.

By embedding sustainability into our model, we support long-term growth, build resilience and solidify our position as a trusted partner across our value chain. Through our partnership with our customers, colleagues and communities, we are positioned well to accelerate sustainable and inclusive growth.

We view the challenges of climate change, resource depletion, and social equity not just as risks being 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 and through collaboration, we are creating greater impact by aligning real needs with bold solutions.

Our 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 are inspiring positive change and remain steadfast in our commitment to responsible business practices, upholding human rights, safeguarding the environment,
and conducting business with the highest standards of integrity.

HADLEY GREEN

Sustainability **Governance Structure**

Sustainability Team

Shareholders — Drive governance responsibility across the Group and ensure sustainability considerations are embedded into

The Board — **O**versee the Sustainability Strategy, Reporting and Risk Management

Senior Leadership Team — Formulates strategic direction on emerging Sustainability and ESG risks and opportunities

Business Operations — Drives execution of regional initiatives

The Governance framework reflecting workflow of group wide sustainability initiatives

About our Report:
Scope and Boundaries

Reporting Period and Framework Alignment

This Sustainability Report provides an update on Hadley Group's ongoing progress against our 2030 Sustainability Roadmap. As we advance toward these milestones, we continue to embed sustainable practices deeper into our business model to create long-term value for our stakeholders. This roadmap is designed to drive sector-wide sustainable development, unlock new commercial opportunities, and foster global collaboration.

Our report is aligned to the Global Reporting Initiative (GRI), which covers most of the UN Global Sustainable Development Goals (SDGs).

This report covers the fiscal period from May 1, 2025, to April 30, 2026. It delivers enhanced, transparent disclosures regarding Hadley Group's policies, practices, and performance across our core ESG pillars: Environmental, Social, Economic, and Governance impacts.

United Kingdom
HADLEY GROUP HQ

HADLEY CUSTOM ROLLFORM (INC. UltraSTEEL®)

HADLEYFRAME & HADLEY BUILDING PRODUCTS
OLDBURY

United States
CDH CUSTOM ROLLFOIL,

Europe
HADLEY CUSTOM ROLLFORM,

United Arab Emirates
HADLEY INDUSTRIES FZE,

Asia
HADLEY INDUSTRIES THAILAND,

Reporting Boundaries and Data Exclusions

The performance data and narrative content within this report encompass all majority-owned operating companies across our key global regions:

United Kingdom
Thailand
United Arab Emirates
The Netherlands

Sustainability Data/Metrics Exclusion Note: Due to operational control limitations, significant environmental data exclusions apply to our joint venture operations in the United States of America.

Stakeholder Engagement and Feedback

We are committed to providing an authentic, accurate assessment of our performance, encouraging open dialogue regarding both our achievements and the complex sustainability challenges facing the manufacturing and engineering sectors.

We look forward to continued engagement with our stakeholders—including our people, customers, communities, suppliers, and shareholders—in the year ahead.

We actively invite your feedback, thoughts, or questions on this report at **sustainability@hadleygroup.com**

(Our report is aligned to the Global Reporting Initiative (GRI) and the UN Global Sustainable Development Goals (SDGs).

A Message from our **Group Managing Director**

Over the past fiscal year, we have significantly accelerated our commitment to sustainable development, cementing its position as a core priority on our Board agenda.

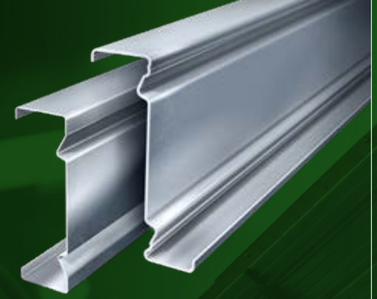
We are embedding these principles across our global operations through targeted, high-impact initiatives:

ESTABLISHING OUR CARBON BASELINE:
Revalidating our Scope 3 emission baseline and strengthening the data collection methodologies for Scope 1 and 2.

BUILDING DIGITAL INFRASTRUCTURE:
Designing robust, custom data systems from the ground up to

TRANSLATING POLICY INTO PRACTICE:
Converting theoretical governance frameworks into actionable, operational workflows across our business units.

HUMAN CAPITAL INVESTMENT:
Aligning our organisational talent with our sustainability strategy, ensuring we maintain and exceed our baseline commitments.



Despite a continuously challenging macroeconomic and operational climate, Hadley Group recognises that the green transition presents both profound challenges and immense commercial opportunities. Guided by organisational capabilities and market realities, we have established clear priorities rooted
in three material pillars:

DECARBONISATION:
Aggressively reducing emissions across our production facilities and energy inputs.

CIRCULAR ECONOMY:
Engineering out waste by leveraging our advanced cold roll forming and UltraSTEEL® technology to optimise raw resource efficiency.

SUPPLY CHAIN EXCELLENCE:
Partnering with strategic suppliers to manage upstream impacts and

We firmly believe that running a resilient, future-proof business requires an exceptional workforce. We are incredibly proud of our people and their steadfast dedication through challenging global economic cycles.

To accelerate our internal capabilities, we are actively investing in upskilling and reskilling our workforces, preparing them to lead the manufacturing transition. Concurrently, we remain deeply committed to cultivating a safe, diverse, and inclusive workplace while driving positive social value across the local communities we serve.

Ben Towe, Group Managing Director

Reflection on Our Progress:
Turning Ambition into Action

At Hadley Group, our Environmental Management System (EMS) is not just a set of policies or a compliance checklist – it is the heart of our commitment to the future. It serves as the vital framework that transforms our sustainability vision into daily, actionable reality. By meticulously managing our resources, reducing waste, and optimising our energy efficiency, the EMS ensures that every step we take as a business leaves a lighter footprint on the planet. For us, environmental stewardship and industrial excellence are not competing priorities, they go hand in hand.

Our sustainability journey is about building a resilient, responsible legacy and our EMS is the compass that guides us there, providing that true innovation is always sustainable.

Mark Pendrey,
HSE Systems & Compliance Manager, UK

Since joining the organisation six months ago as HSE Manager at our Ede site, I have seen how sustainability is embedded in our daily operations. What stands out most is the clear commitment from the Management Team, not just in ambition but in visible action and delivery.

At Ede, sustainability is part of how we work—from solar panels generating around 8% of our energy needs, to personalised stainless steel cups and optimal recycling. The solar installation is particularly valuable given the challenges of energy availability due to grid congestion in the Netherlands, helping to secure a more reliable and sustainable energy supply, and impactful every day.

Ida Eling,
HSE Manager, Netherlands

What inspires me most is that our sustainability journey is no longer driven by mere compliance or external pressure, but by true conviction. I firmly believe that value creation and corporate responsibility must go hand in hand. The metal sector possesses the unique power to accelerate sustainable transformation far beyond its own operational boundaries.

Through our 2030 Sustainability Programme, we are determined to deliver lasting, positive impacts for our stakeholders and for society at large. Here is to a continuing journey—and to making 2026 the year where sustainability becomes even more deeply embedded in how we operate, innovate, collaborate, and lead.

Doyin Adeleye,
Group Sustainability Manager

Our Strategic Priorities

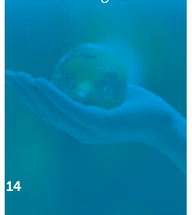
Our stakeholder informed 2030 Sustainability Strategy is driven by three interconnected pillars:

Decisive Environmental Action | **Positive Social Impact** | **Responsible Governance**

This comprehensive framework is critical to enhancing our brand reputation, ensuring long term business viability

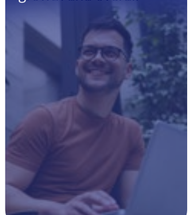
Operational Excellence

We are committed to optimising our operations to achieve a dual benefit; providing excellent services to our customers while reducing our



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 overall

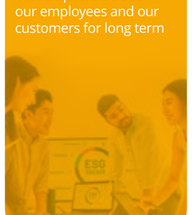


Community Enrichment: Investing for Lasting Social Value

We are focused on delivering, targeted, profound and highly impactful support to the communities we serve.

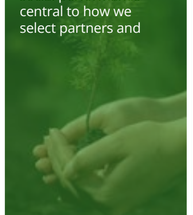
Future Proofing: Investing in Potential

We are committed to continuous investment in the potential of our people to be a core driving force, ensuring we remain a forward-thinking business that empowers both our employees and our customers for long term



Greening our value chain: Sustainable Sourcing and Procurement

We remain committed to prioritising sustainability in every supply chain portfolio decision, making environmental and social performance central to how we select partners and



Climate Action: Decarbonisation and Green Energy

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

FY25/26 at A Glance

STRATEGIC THEME	KEY FOCUS AREAS	PERFORMANCE ACHIEVEMENTS
1 Governing with Integrity	Supply Chain & Governance	• Our organisation leadership is directing increased capital towards capabilities that strengthen sustainability integration • Strengthened overall governance by **revising risk management processes** and filling policy gaps. • Identifying our diverse supplier numbers • Strengthening our procurement and responsible sourcing policy and strategy • During FY 25/26 reporting period, zero critical concerns were escalated to the People function or the Board. • Risk assessment of business ethics and supply chain practises
2 Empowering Our People	Workforce Potential & Development	• Through increased upskilling and reskilling of existing employees, we have further prepared our workforces to develop personal capability and strengthen business resilience • Advanced **apprenticeship programs** with 31 levy funded programmes and 12 apprenticeship courses. • **Maintained strong safety:** Our 2030 Safety target is to achieve a Total Incident Frequency Rate (TIFR) of < 50.0 accidents per million hours worked. At the end of FY25/26 the Group TIFR was 38.7 and improved by 12% over the prior year and significantly lower than the 2030 target. • We have continued our leadership and management pathway training programme, providing consistent education, tools and support to our colleagues.

Sustainable Development Goals Supported

Hadley Group recognises the importance of the UN Sustainable Development Goals (SDGs) work towards a world of peace and prosperity, eradicating major issues such as poverty and hunger, all while protecting the planet. In the midst of the climate crisis, this has never been more important.

Aligning our operations with the UN SDGs is highly impactful and we are committed to further contributing towards the UN SDGs.

UN SUSTAINABLE DEVELOPMENT GOAL	HADLEY GROUP'S 2030 COMMITMENTS
3 GOOD HEALTH AND WELL-BEING	**Mental Health Support –** Through Hadley Group's Employee Assistance (EAP) Programme. We will measure the utilisation rate annually
	Promote employee work life balance and Offer Flexible working packages where roles are compatible
	Strengthened overall governance by revising risk management processes and filling policy gaps.
4 QUALITY EDUCATION	We commit to providing 100 % of our global workforce with dedicated learning hours for professional upskilling, including mandatory sustainability literacy sessions.
	Eliminate gender disparities in education and ensure equal access to all levels of vocational training for vulnerable, including persons with disabilities, and young workers

UN SUSTAINABLE DEVELOPMENT GOAL	HADLEY GROUP'S 2030 COMMITMENTS
7 AFFORDABLE AND CLEAN ENERGY	Scaling renewable energy share of energy mix across our manufacturing facilities
	Maintaining 100% of electricity sourced from renewable energy sources where available.
8 DECENT WORK AND ECONOMIC GROWTH	Achieve higher levels of economic productivity through diversification, technological upgrades and innovation
	Protect labour rights and promote and a safe and secure working environment for all
	Training and Development – Invest in Safety, technical or professional training completed per employee annually
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Research and Development Investment – R & D budget allocated to eco-design, product efficiency and clean energy upgrades
	Sustainable Product Revenue – Increase the percentage share of total revenue generated from low carbon products

UN SUSTAINABLE DEVELOPMENT GOAL	HADLEY GROUP'S 2030 COMMITMENTS
11 SUSTAINABLE CITIES AND COMMUNITIES	Community Investment – Improve on volunteer hours dedicated to local community projects, schools or environmental clean-ups near operational sites
	Local Procurement – Increase percentage of procurement spend allocated to local suppliers to minimise transit emissions and local economy development, where available and appropriate.
	Contribute to the reduction of the adverse per capital environmental impact of cities, including specific attention to waste and greenhouse gas emissions. Through our quantitative emission reduction targets and waste management approaches
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	100% diversion from landfill across our UK and Netherlands sites.
	Fully adopt the principles of circularity
	10-15% recycled content in the primary raw material for our product fabrication.
	100% of generated production process scrap waste is recycled
	Reduce waste generated through prevention, recycling and reuse
13 CLIMATE ACTION	Greenhouse has (GHG) Intensity Reduction – Scope 1 (direct) and Scope 2 (indirect) emissions calculated as metric tonnes of CO_2 equivalent per tonne of product manufactured (tonnes CO_2e/tonne product produced)
	Scaling renewable energy share of energy mix across manufacturing facilities and maintaining 100% electricity sourced from renewable energy sources where available.
	Prioritising sustainable business travel options where sustainable options are available.

UN SUSTAINABLE DEVELOPMENT GOAL	HADLEY GROUP'S 2030 COMMITMENTS
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Zero tolerance compliance: Enforce 100% compliance with our Anti-Bribery, Anti-Corruption and Fair Competition policies across all global business units
	Whistleblower Access: Maintain a secure, independent, and confidential whistleblowing channel available to 100% of employees and external stakeholders with a guaranteed non-retaliation mandate.

Material Topics

Initiated in 2025 and refreshed in 2026, our annual Double Materiality Assessment enables Hadley Group to capture both impact and financial materiality, ensuring transparent alignment with stakeholder priorities and regulatory standards.

This ongoing process is critical to deepening our understanding of stakeholder expectations, directly informing our sustainability priorities, strategic planning, and reporting frameworks.

To pinpoint our most material issues, we conduct a rigorous review of our internal context—gaining insights into the factors shaping our industry, market, and organizational priorities—while actively engaging a broad range of external stakeholders, including customers, partners, colleagues, and suppliers. This comprehensive feedback allows us to identify where the Group can create the greatest positive impact, as well as where we face the most significant risks and responsibilities.

Our approach prioritises the top environmental, social, and governance (ESG) outcomes derived from this double materiality assessment. Through stakeholder surveys, we evaluate the significance of identified impacts against rigorous criteria, including scale, scope, and irremediable character. This sharp focus allows us to channel resources and investment toward areas of greatest impact, embed sustainability deeper into our corporate decision-making, and strengthen accountability and clarity in our reporting.

The documented findings of this assessment directly inform our strategic decision-making, ensure close alignment with our core Group business strategy, and shape the

Delivering our 2030 **Sustainability Roadmap**

Our strategic vision extends to 2030 and beyond, ensuring our commercial growth directly accelerates global sustainable development.

Science-Aligned Decarbonisation Target

Hadley Group is committed to a measurable decarbonisation trajectory. We have established an internal target to reduce our absolute Scope 1 and 2 greenhouse gas by40% by 2030, against our FY23/24 baseline. This target has been developed with reference to established decarbonisation methodologies and is intended to support a pathway aligned with the ambition of limiting global temperature rise to 1.5 degrees centigrade.

Our target is an internal performance benchmark and has not been submitted to or approved by the Science Based Targets Initiative (SBTi), or any other independent third-party target validation body. We intend to deliver our emissions reduction through a combination of self-generated renewable energy, building services optimisation and upgrades, transition to electric vehicles, lower carbon alternative fuels, circular manufacturing practises and renewable electricity.

Future-Proofing Our Workforce

Accelerating our internal capability development is vital to achieving our long-term goals. The green transition requires entirely new operational skillsets, and we are investing in upskilling our in-house design and engineering teams to master advanced generative design, material optimisation and low carbon manufacturing techniques.

Operational Training: Our manufacturing workforces are being reskilled to operate our next generation of energy-efficient rolling machinery, ensuring that clean technology is

Product Circularity & Lifecycle Assessments (LCAs)

We are expanding our capabilities where feasible to provide clients with verified Environmental Product Declarations (EPDs) and LCAs for our structural components, offering transparency into the embodied carbon of our technology.

Evolving Governance & Accountability

To sustain our progress toward 2030, our governance models will continue to mature. We will continue to treat environmental and climate transition risks with the exact same rigor

Empowering Our People:
Progress and Commitments

At Hadley Group, we strive to be an employer of choice, cultivating an inclusive, dynamic, and engaging environment where every individual is empowered to contribute their best work. Our core commitment is to remain the first choice for our people.

Our shared corporate values, shaped directly by our employees, define how we collaborate and are essential to fostering a unified sense of purpose. This empowered workplace culture serves as the primary engine driving the successful execution of our global business strategy. Our consistently low employee

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. **Inclusive leadership –** equipping managers with the skills to lead diverse teams with empathy and fairness **Equitable recruitment –** widening talent pipelines, reducing bias, and ensuring transparent selection processes **Representation goals –** tracking diversity metrics and setting achievable targets **Belonging initiatives –** creating spaces where employees can connect, share experiences, and influence positive change **Continuous listening** – using surveys, focus groups and dialogue channels to understand lived experiences and act on feedback.	Percentage of women in senior level management and leadership position = 3.52% Percentage of ethnically diverse senior managers = 3.5%	Refreshed our DEI policies to support recruitment, development and retention functions as part of our wider People Strategy
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.	Our 2030 target is to achieve a Total Incident Frequency Rate (TIFR) of < 50.0 per million hours. At the end of the FY 25/26 financial year, we achieved 38.7 which is a further 12% reduction over the prior year and over 22 % below the 2030 target.	Mandatory safety and compliance training pass rate. Implementation of high cut resistant (Cut D-F) gloves in our operations. Continued investment in Pedestrian Segregation and Line safety improvement plans. Continued drive for better training and risk awareness through training out and signing up to Job Safety Analysis (JSA) and risk assessment.
Community Enrichment	To encourage and increase employee volunteering, focusing resources to maximise positive, deep-seated impact within the communities we serve	Our revitalised Social and Charity Committee hold regular monthly strategy meetings and has better targeted interventions and initiatives aimed at supporting community enrichment programmes. An impact report for FY 25/26 is due for release in July 2026.	Continuation of the Hadley Social and Charity Committee team (UK). Revised charitable offering strategy to reflect Hadley Group's core values. Engaged employees more to drive effectiveness and participation in social and charity initiatives.

Investing in Human Capital **and Responsible Operations**

We recognise that our workforce is our greatest asset and the foundational driving force behind our corporate commitments—including our focus on responsible sourcing, high-quality production, and community wellbeing.

To support our teams, we actively invest in structured, continuous learning and development programs. By fostering a culture of lifelong learning, we ensure that our global operations consistently achieve the highest standards of safety, environmental stewardship, and manufacturing excellence. A Learning and Development (L&D) Framework Aligned with Sustainability.

Our L&D framework is explicitly linked to our broader 2030 Sustainability Roadmap and governance objectives. Rather than treating professional development as a separate initiative, we focus heavily on ensuring that our operational and engineering teams thoroughly understand:

Resource Efficiency

Minimising raw material usage through precision manufacturing.

Carbon Reduction

Understanding the levers required to decrease operational emissions across our facilities

Circular Economy Principles

Maximising the lifecycle and recyclability of our structural steel components.

This localised, knowledge-driven approach allows us to aggressively reduce our operational footprint from the ground up while directly contributing to the long-term

Human Rights, Social Issues and Diversity and Inclusion

At Hadley Group, we are aware of the multifaceted challenges that human rights, social issues and diversity present All of these are a strategic priority for us as we recognise the value of these initiatives regardless of external criticisms, and we remain committed to them as a result.

Upholding and championing human rights are essential to how we operate, not just within our own operations but throughout our supply chain.

The diversity of our workforce demonstrates resilience despite political and other external pressures. We firmly believe a diverse workforce drives better outcomes and our commitment is to continue to maintain a workplace where every individual feels respected,

Hadley Group's People Strategy is a 2030 aligned, seven pillar framework designed to build a safe, skilled, engaged and globally scalable workforce. It strengthens leadership capability, culture, safety, governance, innovation, customer centricity and operational excellence across all regions.

Seven Pillars:

- *Zero Harm*
- *Leadership & People*
- *Customer Centric*
- *Global Growth*
- *Progressive Innovation*
- *Sustainable Governance*
- *Operational Excellence*

The strategy focuses on creating a consistent, high quality employee experience, embedding Zero Harm behaviours, developing futureready leaders, standardising global people practices, and enabling innovation and customer focused mindsets.

HR has also been working closely with the Sustainability Team by embedding safety and wellbeing into leadership behaviours, integrating DEI and psychological safety into the employee experience, improving global compliance and workforce data accuracy, and standardising ethical, transparent people practices.

Together, these efforts reinforce sustainable people management, reduce organisational risk, and support Hadley Group's longterm ESG commitments.

Clare Hennessy – Director of HR

Modern Slavery

We are committed to addressing modern slavery, servitude, forced labour, and human trafficking in all its forms, and conducting our business in a fair, responsible, honest, ethical, and open manner.

Our risk management procedures and controls ensure that potential modern slavery and human trafficking issues related to our operations are understood and addressed promptly. Active steps are taken to ensure our supply chain is not engaging in any form of modern slavery or human trafficking through our third-party risk management, which includes due diligence and ongoing monitoring controls.

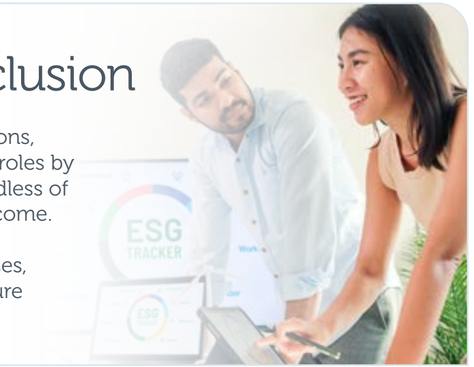
Across our Group operations, we provide training to help our colleagues identify signs of modern slavery and human rights infractions. Our modern slavery policy is approved by our Board; it details the policies the Group has put in place

In FY 25/26, there were no instances of modern slavery or human rights issues identified across our operations or value chain. We will continue to conduct an annual review of these policies and statements to ensure they remain fit for purpose and align with

Accelerating Diversity and Inclusion

We are actively driving gender balance across our global operations, with a firm commitment to achieving 15% women in leadership roles by 2030, majority of our colleagues feel they are fairly treated regardless of their positions and ensuring our workforce are made to feel welcome.

To achieve this, we are focusing on equitable recruitment practises, targeted leadership development and fostering an inclusive culture where all talent can thrive.



Investing in People **and Community**

We are deeply committed to empowering our workforce and driving positive social impact in the communities we serve.

Our employees actively dedicate time each month to volunteer as mentors, equipping the next generation with the skills, confidence, and strategic support needed to thrive in the modern world of work.

True sustainability begins from within, which is why we continue to expand our comprehensive Benefits Programme. Designed to support holistic health, this regionalised framework provides our team with robust physical, social, financial, and mental health resources, including free, accessible support services and targeted financial wellbeing tools.

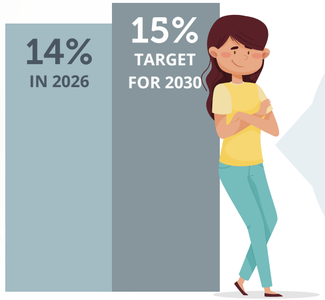
Understanding that an engaged workforce is the foundation of high performance and long-term retention, we are expanding our feedback mechanisms. By strengthening our two-way listening channels and introducing advanced measures to track alignment and morale, we ensure our workplace culture evolves alongside the needs of our people.

Health Assured Employee Assistance Programme

Benefits at Hadley Group

- Flexible Working (Glide hours & Hybrid Working)
- Pension Scheme
- Free Parking
- 25 Days Holiday plus Bank Holidays
- Holiday Purchase Scheme
- Long Service Awards
- Service Bonus
- EAP Scheme
- Free Flu Vaccinations
- Eye Care Vouchers

Women in Management Level Roles



15% TARGET FOR 2030:
We have been monitoring and addressing disparities in pay between gender across all our sites. Hadley Group is an equal opportunity employer that doesn't discriminate based on race, gender expression, religion or sexuality.

UK Gender Pay Gap Report FY25/26

Women's median hourly pay

2.7% lower

Women earned 97p for every £1 that men

Women in the highest paid quarter

9.9%

and 20% of the lowest paid quarter.

Women who received bonus pay

68.3%

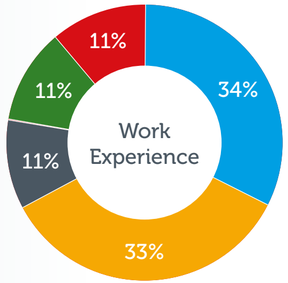
compared with

Strategic Talent Management

Operating within a unique and competitive sector, we prioritise recruiting and retaining the best in the industry. We nurture emerging talent through dedicated

Students Work Experience

- Hadley Group Technology
- Hadley Industries
- Hadley Custom Rollform
- Hadley Construction Technology
- Requests



5. How would you rate your work experience at Hadley Group? *
★ ★ ★ ★ ★

6. Can you explain your rating? *
I really enjoyed my time there and felt I learned a lot about the company and the world of work within engineering.

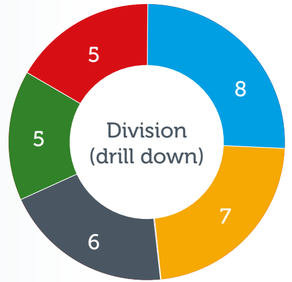
7. What did you enjoy most about your work experience? *
I loved getting to know about the machines and the design process that goes into making all your products, and getting a closer look at what goes on was really interesting.

8. What skills have you learnt or developed during your time at Hadley?
I felt I learned a lot about CAD and design, and how important it actually is to a business within engineering.

9. What could've made your experience better? *
I feel as because I was only there for a short time I didn't get to experience everything within the division of the company. So if I was able to go back I would love to focus more on a single specific role and get a more in depth view of what it is.

Apprenticeships

- Hadley Industries
- Hadley Group Technology
- Hadley Custom Rollform
- Hadley Building Products
- HadleyFRAME



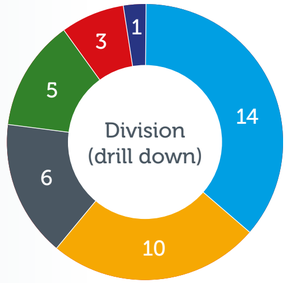
Total People on Levy Funded Programmes – **31**

Total Number of Apprenticeship Providers – **9**

Total Number of Different Apprenticeship Courses – **12**

External Training Summary

- Hadley Industries
- Hadley Custom Rollform
- Hadley Construction Technology
- HadleyFRAME
- Hadley Group Technology
- Hadley Building Products



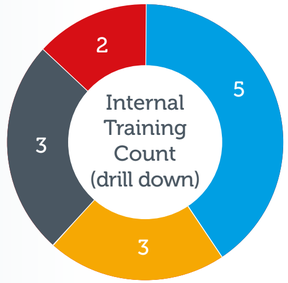
Total Training hours – **560**

Total number of sessions – **16**

Total people training – **433**

Internal Training Summary

- Hadley Industries
- Hadley Custom Rollform
- Hadley Group Technology
- Hadley Building Products



Total Internal training hours (UK) – **64.5 hours**

Total number of sessions – **3**

Total number of people training – **13**

Course topics – Coaching, Apprenticeship Programme and Understanding Emotional Intelligence

DRIVING SUSTAINABLE EFFICIENCY

We aim to achieve a 10% increase in tonnage output per employee (against an April 2022 baseline). By integrating training with mechanisation and automation, we are boosting operational efficiency while simultaneously protecting jobs

CULTURAL EVOLUTION

Our expanded learning and development programs serve as the catalyst for embedding a strong sustainability culture and driving meaningful employee engagement across all

Community Enrichment

We are dedicated to championing our local communities by enhancing livelihoods, inspiring future generations, and delivering meaningful, long-term value. Whether through leadership, charitable initiatives, school partnerships, or regional skills development, we aim to create a lasting positive impact where we operate.

To maximise our reach, we empower our employees to make a direct difference through three core pillars:

Strategic Charitable Giving

Channelling financial support through our local Charitable Giving Fund to causes that matter most to our

Targeted Partnerships

Fostering community sponsorships and educational partnerships that drive localised development and

Employee Volunteering

Encouraging our people to dedicate their time and expertise to grassroots initiatives.

To ensure alignment, accountability and effectiveness, all community enrichment efforts are centrally coordinated by our dedicated Charity and Social Committee, ensuring our resources deliver maximum,

Community Impact Snapshot (UK)

£78k
mobilised to support local charities and community initiatives

Our employees have donated over 248 hours of volunteering, wo… 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, 2 days monthly (academic year) of employer engagement, enterprise advisor, 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.**

At Hadley Group, we recognise the vital importance of delivering a tangible, positive impact within the local communities that host our global operations.

By moving away from fragmented giving, the Social Value Fund ensures that our capital is deployed precisely where it can generate the most impactful return.

Looking ahead through 2026, a primary operational priority for our social Value Fund will be the implementation of structured Social Impact Partnerships to accelerate progress. These long-term, collaborative alliances are designed to scale our community outreach and deliver mutually beneficial outcomes:

Improving Local Lives: Partnering with established non-profits and community organisations to address targeted regional socio-economic challenges.

Mobilising Employee Volunteering: Creating structured opportunities that encourage our workforce to actively participate in community-led initiatives during working hours.

Mutual Capability Development: Providing a platform where our people can build new leadership and interpersonal skills while simultaneously supporting their local communities.

Through the integration of this fund and our upcoming partnership framework, Hadley Group continues to transition its social responsibility from traditional corporate giving into sustainable, long-term value creation.

Health and Safety

Health & Safety Summary for FY25/26 Sustainability Report

This summary outlines the Health & Safety (H&S) performance for FY25/26, 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.

FY25/26 Performance and TIFR Achievement

The Group achieved a significant overall reduction in accident frequency and severity during FY25/26, reflecting an improvement in safety culture and management system.

- **Total Incident Frequency Rate (TIFR):** The Group's TIFR for FY25/26 was 38.7 per million hours worked and below the 2030 target.
- **Performance:** We surpassed our FY25/26 target of ≤42.9, it represents a substantial 12.2% year-on-year reduction from the previous financial year.
- **2030 Target:** The FY25/26 actual TIFR of 38.7 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 17% (from 63 to 52). Major accidents also reduced by 60% (from 10 to 4), with a corresponding reduction in the severity of harm reducing lost and modified days from 68 to 43, a 37% reduction.

Safety Critical Programs (The Critical 3)

The H&S investment strategy focuses on the Critical 3 major risk areas to engineer out risk[8].

- **FY25/26 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. From FY25/26 **"Cuts to Hands"** became the third critical risk project to drive renewed attention on hand injury prevention the most prevalent in the group, and by adopting higher cut resistance gloves this contributed to the drop in the number of accidents and is expected to deliver reductions in FY26/27.

- **Compliance** remains at the core of our activities and in the UK FY25/26 saw the groundworks completed in the UK Safety Management System (SMS) not only contributing to accident reduction, but the pre-certification and Stage 1 audits completed in preparation of the UK manufacturing sites attaining ISO45001 certification were completed with no improvement observations. July 2026 will see the 9 days of external auditing with the intent of achieving this recognition.

Training and Competency Highlights

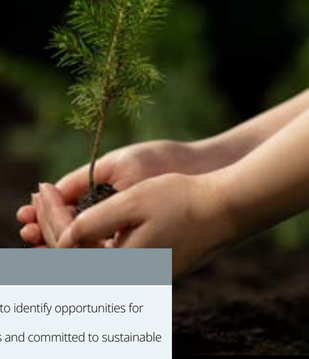
We delivered significant training programs to enhance employee competency and safety knowledge:

- **eLearning: 1,972** safety-related eLearning courses were completed across the Group.
- **Job Safety Analysis (JSA) and Risk Assessment (RA):** We continued our program of writing, reviewing and signing off JSA and RA within all areas of the group to drive awareness and build competency in tasks.
- **Minor Near Miss and Hazard spotting:** We set targets for all Business Units to increase significantly the amount of minor Near misses and hazards as the initial stages of our Visible-led Safety Culture program. This led to a 115% increase in reporting and subsequent close out raising the monthly reported average for the

Focus and Objectives for FY26/27

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.
- **Visible-led Safety Culture:** Continue with our 5–6-year plan implement culture change programs and FY26/27 will focus on driving an increase proportion of Minor Near Misses and Hazards coming from the shopfloor workers, go deeper in significant accident investigation to go beyond cause to identify contributing or



Our Environment, Our Responsibility: Commitments and Progress

Our environmental performance is addressed through continuous efforts to improve resource efficiency,

FOCUS AREA	2030 AMBITION	PERFORMANCE HIGHLIGHTS	KEY ACTIONS AND INITIATIVES
Carbon Emissions	Deliver progressive carbon emissions reduction across Scope 1,2 and 3 by 2030.	• Operational efficiency through improved energy management across core facilities • Logistics optimisation achieved through measurable fuel and emission reduction across fleet operations • Renewable transition • Enhanced Scope 3 visibility through standardised data collection framework across the supply chain	• Infrastructure upgrade and energy audits to identify opportunities for energy and carbon emission reduction • Implemented route management systems and committed to sustainable alternative fuel • Clean energy deployment in our Netherlands operation. • Enhanced value chain engagement through deep supplier collaboration to capture primary emission data and explore partnerships beneficial to sustainability excellence across the value chain.
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.	• Reduced overall paper consumption through digital transformation • Zero waste to landfill across the UK, Netherlands site and monitor opportunities as they arise in Thailand and UAE (Freeport area) • Seamless scrap metal recycling • Optimised waste management contract • Compliance with environmental regulations regarding waste disposal	• Phasing out paper-based processes where possible in favour of electronic and digital business workflows across global operations • Annual waste management reviews to identify quick wins and improve efficiency • Sensitisation programme of waste management across global sites
Products	Leverage innovation and technology to develop new low-carbon products	• Initiated R&D frameworks to evaluate low-carbon product life cycles • Started the process of introducing new low-carbon products into our portfolio	• Integrated sustainability criteria (low carbon and high recycled content) into product development pipeline and technology roadmap • Expanding the pool of product offering to include more low carbon options
Supplier Sustainability	Engage 100% of suppliers on sustainability by 2030, creating a collaborative ecosystem with key partners.	• Increased engagement and collaboration with supplier and other value chain partners • Improved oversight of supplier sustainability practises • Suppliers representing 90% direct procurement spend successfully assessed on sustainability practises	• FY 26/27 Launching supplier onboarding modules • Developed sustainability assessment frameworks • Low carbon procurement initiative targeting our primary material supply

Our Environment, Our Responsibility:
Decarbonisation and Energy Efficiency

Delivering on our core environmental commitments requires a multi-faceted approach.

We prioritise driving operational efficiencies, integrating low-carbon technologies into our products and processes, and investing in renewable energy. We have set ourselves some new set of targets to achieve by FY 26/27, and this includes reducing our water consumption by 5% and energy (gas and electricity) consumption by 15% across our global operations against FY25/26 metrics.

We will measure our performance against this target at our next disclosure by monitoring our consumption monthly, reviewing the performance of the measures we have implemented, and comparing our year-on-year consumption to determine our progress.

A key milestone was the completion of our solar project at our Ede facility in Netherlands in 2025, which now generates approximately 8% of that site's energy needs. Building on this success, we are committing further investment in the future financial year to expand our clean energy mix and increase self-generation capacity at our Gaitskell Way site in the West Midlands, to complement a self-generating solar and battery storage EV charging installation.

Beyond our facilities, we continue to champion sustainable transport. We have maintained our commitment to Hydrotreated Vegetable Oil (HVO) for our own truck transport fleet within the UK, despite very unfavourable price inflation, reinforcing our commitment to sustainable transport. We continue to expand our workplace car and van fleet to accelerate electric vehicle (EV) and hybrid adoption across the business.

We continue to invest in decarbonisation and energy reduction programs across the group, with the replacement of roof lights to allow natural light and sodium bay lights to modern LED high bay lighting in Dubai and installing a Building Management Systems in 2 of the 3 UK facilities to manage gas heating, boilers, and destratification fans.

Looking ahead, we will continue to evaluate and consider emerging decarbonisation technologies and upholding our commitment to driving progress as well as leading our industry towards a more resilient future.

During FY 25/26, we conducted a comprehensive review and revalidation of our Scope 3 carbon accounting methodology to align with best practices under the GHG Protocol. As a result, we have restated our FY 24/25 Scope 3 emission from 675,092 tCO2e to 251,917 tCO2e.

This adjustment stems entirely from enhancements in data quality and calculation methodology—specifically transitioning from conservative, spend-based economic proxies to primary activity data, updated supplier-specific factors, and refined boundary definitions. It does not reflect a change in physical operational footprint for that period.

Comparing on a like-for-like basis, our Scope 3 emissions for FY 25/26 reached 248,198 tCO2e, representing a 1.48% reduction (-3,719 tCO2e) compared to the restated FY 24/25 baseline.

SCOPE	FY24/25 EMISSIONS PROFILE	FY25/26 EMISSIONS PROFILE
Scopes 1	1439 tco2e	1377 tco2e
Scopes 2	1729 tco2e	1810 tco2e
Scope 3	251,917 tco2e	248,198 tco2e

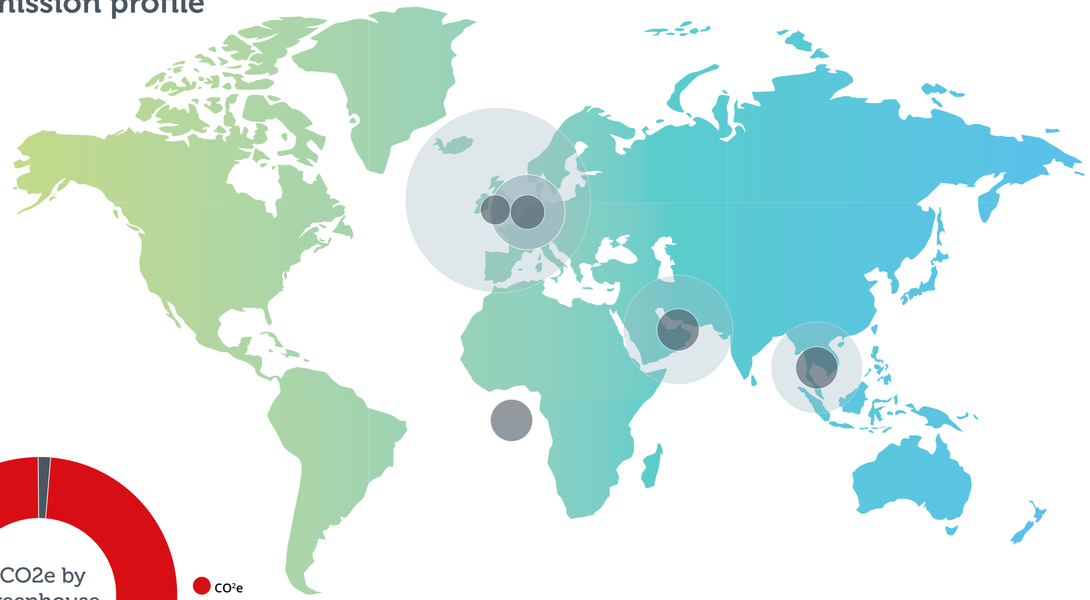
As part of our targeted 2030 Sustainability Roadmap, we successfully executed a high-impact facility modernisation project integrating advanced LED lighting systems with high-performance skylight replacements.

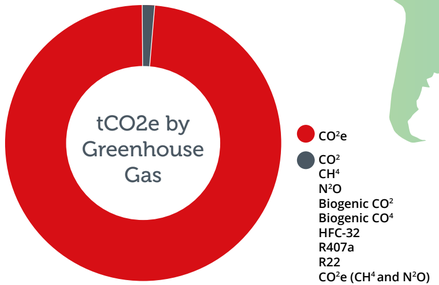
By strategically pairing optimized artificial lighting with enhanced natural daylight harvesting, the project slashes structural energy demand while simultaneously elevating the quality of our indoor operating environment. This capital deployment will deliver ongoing operational dividends, yielding an annual baseline electricity saving of approximately 105,811 kWh. Beyond immediate resource conservation, the systemic reduction in grid reliance directly translates to mitigating 46.03 tonnes of emissions annually, reinforcing our measurable progression toward localised decarbonisation milestones.

Executed at a highly disciplined total investment of 78,756 AED, the initiative demonstrates a robust commercial structure with a compressed payback period. This project stands as a model framework for our ongoing energy efficiency strategy: seamlessly blending fiscal responsibility with aggressive carbon reduction to future-proof our operational infrastructure.

Dhanraj Kumar,
SHEQ Manager, UAE Operations

Geographic summary of our emission profile





- CO^2e
- CO^2
- CH^4
- N^2O
- Biogenic CO^2
- Biogenic CO^4
- HFC-32
- R407a
- R22
- CO^2e (CH^4 and N^2O)

Advancing the Circular Economy and Waste Mitigation

Minimising our operational footprint and treating waste as a valuable resource remains a pillar of our environmental strategy.

To deeply embed circularity across our operations, we pursue a multi-tiered framework focused on resource optimisation, landfill diversion, and sustainable material procurement. Our current strategic focus centres on three parallel workstreams:

Decoupling from Landfill: We are continuously refining our operational processes to eliminate waste at the source and divert residual operational waste away from landfills toward high-value recycling streams.

Sustainable Sourcing: To close the loop on our product lifecycles, we are actively increasing the proportion of recycled raw materials integrated into our production lines, reducing our reliance on virgin resources.

Cultivating a Culture of Waste Responsibility: We recognise that operational change begins with our people. Through targeted internal awareness campaigns and improved on-site infrastructure, we actively engage our employees in daily waste management, empowering them to champion circular practices on the shop floor and in the office.

Greening Our Value Chain

Engaging our broader supply chain on systemic decarbonisation is critical to addressing our Scope 3 footprint and reducing our overall value chain emissions.

Because transport and logistics represent a significant portion of these upstream and downstream emissions, we have taken decisive strategic action to transform our logistics infrastructure.

Eliminating Diesel through Sustainable Biofuels

As part of our commitment to accelerating value-chain greenhouse gas (GHG) emissions reductions, we initiated a targeted shift away from fossil fuels across our transportation segments. Following a highly successful trial phase in 2023, Hadley Group executed a full transition from standard diesel to Hydrotreated Vegetable Oil (HVO) across our dedicated truck fleet in 2024 and sustained despite price inflation in FY25/26.

Now entering its third full year of implementation, this initiative continues to deliver substantial, multi-dimensional benefits across our operations and we have maintained our commitment despite the price volatility in the low carbon fuel space:

Decarbonisation & Fuel Efficiency: Substantially lowering the carbon intensity of our logistics network and moving us closer to our decarbonisation ambitions.

Supply Chain Resilience: Securing alternative, renewable energy sources to insulate our production network from volatile global fossil fuel markets

Regulatory Compliance: Future-proofing our transport framework against tightening UK and European transport emissions standards.

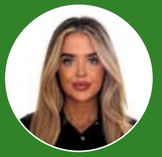
Enhanced Reputation: Demonstrating measurable, actionable environmental performance that aligns with the procurement standards of our sustainability-focused customers.

Value Chain Collaboration and Eco-Design

At Hadley Group, transparency regarding our environmental and responsible practices is fundamental to building lasting customer relationships.

We believe that driving long-term customer value goes hand-in-hand with delivering sustainable products. Because our customers and suppliers are equally committed to sustainability, we prioritise partnering with organisations that share our core environmental values. Rather than treating sustainability as an afterthought, we integrate it into the very beginning of the product lifecycle through collaborative engineering and eco-design. We believe in a shared responsibility towards a sustainable future and are dedicated to promoting low carbon products and solutions

Spotlight on HadleyFRAME



HadleyFRAME is a pre-panelised, lightweight structural steel framing system developed by Hadley Group, incorporating UltraSTEEL® technology and engineered to deliver high levels of structural stability, height capability and construction efficiency. As a Modern Methods of Construction (MMC) solution, it is designed to shift a significant proportion of the build process off-site, enabling greater control over materials, reduced waste, and improved resource efficiency from the outset.

Sustainability is embedded in the nature of the system. As a light gauge steel, off-site manufacturing solution, HadleyFRAME supports a low carbon approach to construction by minimising site activities, reducing transportation and logistics demands, and cutting material waste compared to traditional building methods. The precision of factory-controlled fabrication also reduces rework and errors on site., further improving environmental performance across the project lifecycle.

By enabling faster installation of pre-assembled panels that form a rapid weatherproof shell, HadleyFRAME reduces programme durations and associated site impacts such as noise, dust, and local disruption. The system also supports circular economy principles through the recyclability of steel and the efficient use of raw materials, contributing to improved embodied carbon outcomes.

Delivered as part of a fully integrated MMC offering within Hadley Group, HadleyFRAME combines design flexibility, technical expertise and end-to-end project delivery, from early-stage design and value engineering through to manufacture, installation and completion. This holistic approach ensures sustainability is considered at every stage, supporting clients in achieving compliant, cost-effective and environmentally responsible building outcomes across residential, education, healthcare, student accommodation and hotel sectors

Megan Lassetter
(Senior Marketing Executive, HadleyFRAME)

HADLEY FRAME

Nature and Biodiversity:
Extending Our Focus Beyond Carbon

Recognising that climate change and biodiversity loss are deeply interconnected, we are expanding our environmental stewardship beyond carbon management to actively protect and restore natural ecosystems. We are taking a proactive, systemic approach to biodiversity by focusing on risk management, community-led conservation, and value-chain accountability.

Assessing and Monitoring Biodiversity Risk: We are systematically evaluating our direct operations and broader supply chain to identify dependencies and material risks related to nature loss. By closely monitoring these touchpoints, we aim to insulate our business from ecological disruption while minimising our localised environmental footprint.

Collaborative stewardship: We are aiming to partner with local communities to implement conservation projects where available, that respect regional biodiversity, protect native species, and restore critical habitats near our areas of operation.

Driving Sustainability Across Our Value Chain: We recognise that our impact extends beyond our immediate corporate boundaries. We actively provide them with strategic support necessary to incentivise and empower our suppliers and commercial partners to adopt sustainable, nature-positive practices.

Governing with Integrity

FOCUS AREA	2030 AMBITION (Our Commitment)	FY 25/26 PERFORMANCE HIGHLIGHTS	KEY ACTIONS AND INITIATIVES
Responsible Supply Chain	Formally evaluate all suppliers against environmental and ethical standards; establish clear sustainability objectives for all strategic partners. Integration of sustainability procurement objectives into buyers' performance review (annually)	Successfully audited the Top 10 direct suppliers (by total spend) to assess and verify their sustainability practices. 97.3% of primary raw material spend was to local processing plants and suppliers who are 10-15 mile radius of our operating sites.	Developed a new supplier code of conduct Updated the Sustainability Supplier Handbook and internal procurement policies. Scaled up supplier engagement to simplify compliance and progressively shift purchasing volumes toward vendors with verified environmental credentials.
Responsible Governance	Fully embed measurable sustainability targets into executive governance structures and employee reward frameworks.	Progressed the systematic integration of sustainability milestones into corporate incentive and reward schemes.	Mandated comprehensive training modules on anti-bribery and anti-corruption compliance for customer facing, procurement and HR personnel Aligned employee performance to the recognition of Scope 1 and 2 emission reduction target.

Corporate Governance and Leadership Oversight

Board and Executive Responsibility

Ultimate accountability for Hadley Group's sustainability strategy, its integration, and its performance rests with our Board of Directors, led by the Group Managing Director. The Board maintains comprehensive oversight regarding the formulation and execution of all sustainability action plans, corporate policies, strategic targets, capital investments, and public disclosures, ensuring unified alignment across all international operations.

STRATEGIC REVIEW AND REGULATORY HORIZON SCANNING

To maintain proactive strategic positioning, the Senior Leadership Team (SLT) receives dedicated monthly performance updates. Furthermore, the Board allocates structured time during its regular assemblies to evaluate strategic milestones, investment pipelines, and governance frameworks. This is supplemented by continuous briefings on emerging global sustainability regulations, ensuring the Group remains ahead of compliance curves.

EXECUTION, DELIVERY, AND COMMITTEE FRAMEWORKS

Daily operational execution of our sustainability program is managed by the Group's dedicated Sustainability Team. This core team is structurally supported by cross-functional steering groups and committees aligned with the three pillars of ESG (Environmental, Social, and Governance). These committees meet systematically to design operational roadmaps, oversee initiative delivery, and monitor key performance indicators.

To further mature our governance structure, we are currently establishing a Sustainability Compliance and Initiatives Steering Committee to accelerate our strategic milestones. Simultaneously, we actively monitor the evolving sustainability disclosure landscape across all

Compliance with Law and Regulations

During FY25/26 reporting period, Hadley Group did not record any instances of non-compliance with applicable laws and regulations.

Furthermore, there were no fines or non-monetary sanctions applied for non-compliance

Responsible Tax Governance and Compliance

Responsible tax compliance is a core pillar of Hadley Group's corporate governance framework and underscores our commitment to making a meaningful social contribution to the jurisdictions in which we operate. We view the payment of taxes not merely as a statutory obligation, but as a direct, vital investment in the public services, infrastructure, and economic resilience of our global host communities.

Our fiscal strategy is anchored on strict adherence to all national and international tax laws, ensuring our tax affairs are managed with the highest ethical standards, precision, and long-term sustainability. We maintain a robust internal control ecosystem to mitigate fiscal risks and uphold a steadfast commitment to transparency.

This principled approach reinforces our identity as a responsible corporate citizen dedicated to sustainable value creation for all stakeholders. All material tax strategies, compliance risks, and financial governance matters are formally presented to, and approved by, the Group Finance Director.

Hadley Group operates under a robust and transparent sustainability governance framework designed to embed Environmental, Social, and Governance (ESG) principles into our core business strategy.

Our architecture ensures that sustainability targets are not managed in isolation, but are fully integrated into our operational workflows, risk management frameworks, and capital allocation strategies. By maintaining a clear line of sight from shop-floor initiatives to boardroom decisions, this structure ensures total organisational accountability and drives the continuous evolution of our sustainable business models. Earlier this year, we updated our sustainability governance framework to

Ethics and Integrity

Hadley Group is steadfast in its commitment to upholding the highest standards of ethics, integrity and regulatory compliance across our global operations, mandating the same baseline adherence from our value chain partners.

Our core policies, operating standards and governance processes are strictly aligned with statutory legislative requirements and

COMPLIANCE AREA	CORPORATE COMMITMENT AND POLICY FRAMEWORK
Code of Conduct	Our Code of Conduct establishes the foundational parameters for maintaining the highest standards of ethical behaviour and corporate citizenship. Compliance is mandatory for all personnel, reinforced by targeted training modules for senior leadership and continuous awareness campaigns across the global workforce
Anti-Bribery and Anti-Corruption	We enforce a strict, zero-tolerance policy against all forms of bribery and corruption. To maintain a robust preventative environment, employees undergo mandatory compliance training. We remain dedicated to executing rigorous internal controls that actively prevent, monitor, and eliminate corrupt practices.
Whistleblowing Mechanisms	We provide a secure, confidential Whistleblowing channel enabling employees, customers, and suppliers to escalate ethical or legal concerns without fear of reprisal or victimisation. We offer a dual-track reporting system featuring both internal channels and an independent, external service that fully supports anonymous disclosures
Modern Slavery Prevention	Our Modern Slavery Policy outlines a zero-tolerance stance against any form of forced labour, bonded labour, child labour, or human trafficking. This mandate applies unequivocally to both our internal operations and our extended tier suppliers.

Grievances and Whistleblowing

At Hadley Group, we strive to maintain high ethical, legal, and regulatory standards across all our operations. We maintain a zero-tolerance approach to bullying and harassment, supported by robust policies and procedures.

Colleagues are empowered to speak directly to their managers, supervisors, or the HR function regarding any workplace concerns. For serious matters, our Whistleblowing Policy provides a secure, multi-channel hotline enabling colleagues to report suspected breaches of laws, regulations, policies, professional standards, or instances of misconduct.

Concerns can be raised confidentially or anonymously. Hadley Group strictly prohibits any form of retaliation against colleagues who report a concern in good faith.

FY 25/26 Performance:
During the FY 25/26 reporting period, zero critical concerns were escalated to the HR

Supply Chain Governance:
Strategic Sustainable Procurement

At Hadley Group, we view our supply chain as a critical lever for accelerating sustainable development and integrate procurement risks as a core business consideration.

A key milestone in our strategic commitment was the launch of our comprehensive supplier sustainability survey.

Recognising the varying maturity levels across our hundreds of suppliers, we utilise targeted assessment tools and direct engagement to address vulnerabilities, mitigate risks, and identify specific, actionable steps to enhance their sustainability performance.

This collaborative framework strengthens our supply chain resilience and accelerates progress across our entire value chain. Notably, no material negative environmental impacts were identified through the supplier assessment undertaken during the reporting year..

We aim to reduce any negative environmental and social effects of the goods and services we buy, and we engage with suppliers and partners to promote responsible practises.

Our work will continue to develop sustainable practises with our suppliers.

To maintain a resilient and future-proof procurement process, we continually refine our Supplier Code of Conduct, purchasing policies, and screening tools for both existing and new

Comprehensive Evaluation:
Formally evaluate all suppliers against our stringent environmental

Targeted Objectives:
Establish clear, measurable sustainability KPIs for all strategic value chain

Responsible Sourcing:
Progressively increase purchasing volumes from certified or audited strategic suppliers.

Localised Spending:
Quantify, optimise, and report on our total procurement spend with local suppliers to support

We have committed our suppliers to our standards, and a central component of our Supplier Code of Conduct, which is publicly available, is key towards:

Data, Information Security and Privacy

Our corporate governance framework establishes a definitive vision and robust policies for Information and Communication Technology (ICT), clearly delineating accountability for data security.

As a core component of our broader information security program, we continuously assess our business operations for risks associated with handling personal data, implementing prompt corrective actions whenever areas for improvement are identified.

Given the escalating importance of data integrity and cyber resilience, we maintain a proactive, preventative focus in this domain. A cornerstone of our digital transformation strategy is the ongoing phased execution of our multi-year, global Enterprise Resource Planning (ERP) system rollout. This standardised infrastructure is central to our digitalisation ambitions, significantly strengthening data consolidation, visibility, and security protocols across our global footprint.

To ensure rapid response capabilities, we maintain a strict incident management protocol. All confirmed or suspected data breaches must be immediately escalated to the IT Service Desk via a dedicated emergency hotline or secure email channel.

We strictly uphold the privacy and confidentiality of our colleagues, customers, and partners, adhering to all legal, regulatory, and ethical standards. Our comprehensive Privacy Policy dictates the compliant and appropriate use of data. To drive continuous improvement, we conduct regular, risk-based analyses that directly inform our strategic focus areas. Furthermore, we mandate data protection training for all employees during induction, supplemented by advanced, specialised training for individuals operating in higher-risk or data-sensitive roles.

Reporting and Disclosure

We remain firmly committed to corporate transparency, meeting the evolving demands of our stakeholders, and navigating a changing regulatory landscape.

To achieve this, we continually align our sustainability disclosures with key global frameworks, ESG ratings, and reporting standards.

Recognising that continuous improvement is vital, we actively participate in cross-industry peer-learning initiatives. Hadley Group is an engaged member of several sector-specific and broader working groups and committees focused on Sustainability Reporting, the Circular Economy, and Climate Action. This active participation allows us to leverage peer insights and capture strategic intelligence on our most material topics.

Our sustainability disclosure is currently aligned with the Global Reporting Initiative (GRI) Standards, incorporating relevant sector-specific recommendations. This rigorous alignment enhances our corporate transparency, builds stakeholder trust, and successfully transitions our strategy from simply stating sustainability goals to

Appendix

Operational Boundary Disclosure

Hadley Group accounts for its greenhouse gas emissions in strict alignment with the **GHG Protocol Corporate Standard**. To ensure data integrity, we manage 100% of our global carbon inventory using the **EcoOnline** ESG system. This system automates our Scope 1, 2 and 3 calculations, applying localised, verified emission factors consistently across all sites.

Our target operational control boundary covers 100% of global operations where we hold operational control.. To support this target, we employ a robust hybrid evidence approach:

Our joint venture operations in the United States are excluded from our sustainability reporting boundary for environmental data due to limited operational control.

GRI Standards Disclosure Index

Application Statement - Hadley Group has reported the information contained in this GRI index for the period May 1st, 2025 to April 30th, 2026 with reference to the 2021 GRI Universal Standards (GRI 1, 2 and 3).

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
GR2: General Disclosures 2021		
The organisation and its reporting practises	7, 8, 9, 18, 28, 32, 42, 43, 49	
2-1: Organisational details	3, 4, 5, 44	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, 9, 52	
2-3 Reporting period, frequency and contact	9, 60	
2-4 Correction or restatements of information	15, 58	
2-5 External assurance	15, 58	
Activities and workers		
2-6 Activities, value chain, and other business relationships	3, 38-41, 46	
2-7 Salaried employees	22-29, 50-51	
2-8 Workers who are not salaried employees		
Corporate Governance		
2-9 Governance structure and composition	7, 41-43	
2-10 Nomination and selection of the highest governance body	7, 42	
2-14 Role of the highest governance body in sustainability reporting	7, 10, 42	
Strategy, Policies and Practises		
2-22 Statement on sustainable development strategy	10, 16-17, 20-21	
2-23 Statement on commitment to policy and conduct	25-26, 41, 44-47	
2-25 Processes to remediate negative impacts	25-26, 44-47	
2-26 Mechanisms for seeking advice and raising concerns	16, 44, 47	
2-27 Compliance with laws and regulations	42, 47	
2-28 Memberships in associations and interest groups	59	
Stakeholder Engagement		
2-29 Approach to stakeholder engagement	9, 18, 38-39, 46	
2-30 Collective bargaining agreements	25, 44	
GRI 3: Material Topics 2021		
3-1 Process to determine material topics	18, 19	
3-2 List of material topics	18, 19	
GRI 201: Economic Performance 2016		
201-2 Financial implications, risks and opportunities of climate change	43	For this disclosure, we have not quantified the financial implications, risk and opportunities of climate change but this will be a critical consideration of future reporting and disclosure.
GRI 204: Procurement Practises 2016		
204-1 Proportion of spending on local suppliers	18, 35, 43, 48	
GRI 205: Anti-Corruption		

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
205-1 Operations assessed for risks related to corruption	44, 52	
205-2 Communication and training about anti-corruption policies and procedures	17, 41, 44	
GRI 207: Tax 2019		
207-1 Approach to tax	42	
207-2 Tax governance, control and risk management	42	
207-3 Stakeholder engagement and management of concerns related to tax	42	
GRI 3: Material Topics 2021		
301-2 Recycled input materials used	17, 33, 37	
GRI 302: Energy 2016		
302-1 Energy consumption within the organisation	34-35, 57	
302-3 Energy intensity	34, 57	
302-4 Reduction of energy consumption	34-35, 57	
GRI 303 Water and Wastewater 2018		
303-1 Interactions with water as a shared resource	34, 56	
303-2 Management of water discharge-related impacts	34, 56	
303-3 Water withdrawal/consumption	34, 56	
GRI 305: Emissions 2016		
305-1 Direct GHG emissions (Scope1)	34, 36	
305-2 Indirect energy-related GHG emissions (Scope 2)	34, 36	
305-3 Other indirect GHG emissions (Scope 3)	34, 36	
305-4 Intensity of greenhouse gas emissions	34, 36	
305-5 Reduction of greenhouse gas emissions	20, 34, 36, 38	
GRI 306: Waste 2020		
306-1 Waste generation and significant waste-related impacts	17, 37, 56	
306-2 Management of significant waste-related impacts	17, 37, 56	
306-3 Waste generated	56	
306-4 Waste diverted from disposal	17, 37, 56	
306-5 Waste directed to disposal	37, 56	
GRI 308: Supplier Environmental Assessment 2016		
308-1 New suppliers that were screened using environmental criteria	41, 46	
308-2 Negative environmental impacts in the supply chain and measures taken	46, 54	No material negative environmental impacts were identified through the supplier assessment undertaken during the reporting year.
GRI 401: Employment 2016		
401-1 New employee hires and employee fluctuation	22, 54	Definition of employee fluctuation rate: employees who leave the organisation voluntarily through retirement, redundancy, or death.
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	26	
GRI 403 Occupational Health and Safety 2018		
403-1 Occupational health and safety (OHS) management system	22, 32	
403-2 Hazard identification, risk assessment and incident investigation	22, 32	
403-3 Occupational health services	16, 26, 32	
403-4 Worker participation, consultation, and communication on safety and health in the workplace	32	
403-5 Worker training on safety and health in the workplace	22, 23, 32	
403-6 Promotion of worker health	16, 26, 32	
403-7 Prevention and mitigation of occupational health and safety impacts directly linked to business relationships.	32	
403-8 Workers covered by an occupational health and safety management system	32, 56	
403-9 Work-related injuries	15, 22, 32, 57	
GRI 404: Training and Education 2016		
404-1 Average hours of training per year per employee	16, 23, 29-30	

GRI STANDARD (S)	PAGE (S)	EXPLANATIONS AND OMISSIONS
GRI 405: Diversity and equal opportunities 2016		
405-1 Diversity of governance bodies and employees	22, 26, 28	No personal information is provided about the Supervisory Board members for confidentiality.
GRI 408: Child Labour 2016		
408-1 Operations and suppliers at significant risk for incidents of child labour	44, 47	
GRI 409: Forced or Compulsory Labour 2016		
409-1 Operations and suppliers at significant risk for incidents of forced labour	26, 44, 47	No operations and suppliers are at material risk for incident of forced labour
GRI 412 Human Rights 2016		
412-1 operations that have been subject to human right reviews or impact assessment	44, 55	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	23, 30-31, 57	
GRI 414: Supplier Social Assessment 2016		
414-1 New suppliers that were screened using social criteria	41, 46	
414-2 Negative social impacts in the supply chain and measures taken	46	
GRI 416: Customer Health and Safety 2016		
416-1 Assessment of the health and safety impacts of product and service categories	39, 55	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**
1377	1810	248198

WATER CONSUMPTION (CUBIC METRES)	6,173.165

WASTE GENERATED (KG)	
Incinerated Waste	169,051
Composted Waste	128,659
Mixed Recycling	1,714,149
Waste to landfill*	0
Waste to landfill	31,615.5

*UK and Netherlands sites.

In our reporting for FY 25/26, overall waste generation showed a marked downward trend. Key shifts include mixed recycling falling alongside a recorded increase in composted waste. While operational waste reduction initiatives contributed to lower total volumes, internal reviews indicate that a portion of the year on year shift particularly within the composted waste category stems from refined waste stream categorisation and data mapping adjustments between reporting periods. As historical system inputs cannot be retroactively adjusted, we are conducting a full audit of our waste streams to establish a re-baselined tracking methodology for future cycles

ENERGY AND ENVIRONMENTAL MANAGEMENT	
Manufacturing sites with ISO 14001	4
Manufacturing sites with ISO 45001	3
Manufacturing sites with BES 6001	2
Manufacturing sites where environmental, business ethics, labour and human rights risk assessment has been conducted	7
Business Unit Operations with Ecovadis Rating	2

ENERGY CONSUMPTION & GENERATION WITHIN THE ORGANISATION (KWh)		
Electricity	6,272,390.38	
Gas	5,305,979	
Self-generation of energy (Netherlands)	PV Solar System	51,350

Community

TOTAL CASH AND IN-KIND DONATIONS*	£77,931.38
PERCENTAGE OF STAFF VOLUNTEERING	2.23%

Health and Safety

TOTAL INCIDENT FREQUENCY RATE (TIFR)	38.7 treatable accidents per million hours worked
TOTAL ACCIDENT	52 (4 Major (Lost Time Incidents), 38 First Aid and 10 No Treatment reports)
MAJOR ACCIDENT	4 Lost Time Incidents

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 2025 to April 2026.

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 equal 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-party 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 and limited assurance 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 verification and limited 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 is no evidence to suggest that the data supplied for the Hadley Group's sustainability report was obtained on an unreliable basis, that the information has been inadequately presented, or that any significant deviations or omissions exist.

Christine Morris

For and on behalf of CM Environmental
CM Environmental, West Yorkshire, UK

To ensure maximum transparency and reporting integrity, Hadley Group subjects its operational environmental data to independent third-party verification. In 2026, data representing over 50% of total Group turnover was externally assured. This rigorous assurance process not only validates our Group-level carbon and sustainability disclosures but also enables our key operating divisions to achieve 'Excellent' ratings under the BES 6001

Sustainability Achievements, Ratings and Standards

External frameworks & standards we align to:

GRI STANDARDS · ISO · SUSTAINABLE DEVELOPMENT GOALS

2025/2026 Sustainability Ratings

BES 6001 Proudly accredited BES 6001! · NQC · ecovadis · ecovadis BRONZE | Top 35% JUN 2026

Membership of Association:

CBM Confederation of British Metalforming · Proud member of Greater Birmingham Chambers of Commerce · FORS ID: 002832 · RIBA Royal Institute of British Architects · Light Steel Frame Association · BCSA · RHA · LOGISTICS UK

FY25/26 Sustainability Awards and Recognition for Excellence

INVESTORS IN PEOPLE | Silver

For further information about our alignment and progress against these standards,

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HADLEY GREEN