Environmental, Social and Governance (ESG) Policy

Team responsible for policy:	Regulatory Compliance Team
Version:	ESGv2.0
Last reviewed:	October 2026 (Updated terminology for clarity on responsibilities)
Last updated:	October 2026
Classification:	Internal

1. Policy Statement

PayStream Accounting Services Limited (PayStream) is one of the leading providers of limited company, umbrella company, CIS, International payroll and back-office services to both contractors and recruitment agencies.

PayStream is committed to conducting business in a responsible, ethical and sustainable manner. We recognise the importance of maintaining high standards of environmental responsibility, social impact and corporate governance in the way we operate, make decisions and engage with workers, clients, suppliers and other stakeholders.

We understand that good ESG practice is crucial for us to embrace. This is the right thing to do. ESG forms part of sound business strategy by helping to mitigate risk, improve operational efficiency, support long-term success and generate value for stakeholders. Our approach is intended to be proportionate to the nature, scale and resources of the business, avoiding unnecessary generalisation while still driving meaningful improvement.

We expect all individuals working for or on behalf of PayStream to uphold the standards set out in this policy and contribute to a culture of integrity, accountability and responsible business practice.

2. Purpose

The purpose of this policy is to:

- define PayStream's ESG commitments and expectations;
- provide a clear framework for responsible business conduct;
- support legal, regulatory and policy compliance;
- promote ethical behaviour, inclusion, wellbeing and accountability;
- encourage proportionate environmental responsibility; and
- clarify roles and responsibilities for implementing and maintaining ESG standards.

3. Scope

This policy applies to anyone working for us, or any group company, or on our behalf in any capacity. This includes, without limitation, employees at all levels, directors, officers, agency workers, seconded workers, interns, contractors (including those employed by our umbrella companies and engaged under the Construction Industry Scheme (CIS)), external consultants, third-party representatives and business partners, or any other person associated with us, wherever located.

This policy should be read alongside other relevant company policies and procedures, including those relating to conduct, whistleblowing, equality, diversity & inclusion, anti-harassment & anti-bullying, health & safety, data protection, information security, anti-bribery, fraud prevention, anti-money laundering and modern slavery.

This policy does not form part of our contract with you, and we reserve the right to amend it at any time.

4. Definitions

For the purposes of this policy the following definitions apply, whether or not the relevant terms are capitalised:

a) **'ESG'** means Environmental, Social and Governance. In this policy, ESG refers to the standards and practices through which the business manages its environmental impact, social responsibilities and governance obligations.
b) **'ESG Steering Team'** means the directors, senior leaders, managers and representative members of the workforce responsible for oversight and execution of the organisation's ESG approach.
c) **'Environmental'** refers to the way the business manages and seeks to reduce the impact of its activities on the environment, including energy, paper, waste and other resources.
d) **'Social'** refers to the way the business treats people and contributes to a fair, safe, inclusive and respectful working environment, including wellbeing, equality, diversity, inclusion and community impact.
e) **'Governance'** refers to the systems, controls, policies, behaviours and decision-making processes through which the business is directed and managed ethically, lawfully and accountably.
f) **'Workers'** includes employees, directors, officers, agency workers, seconded workers, interns, contractors, subcontractors, external consultants, third-party representatives, business partners, or any other person associated with us.
g) **'Stakeholders'** includes Workers, clients, customers, suppliers, partners, regulators and communities affected by the business and its activities.
h) **'Misconduct'** includes unethical behaviour, policy breaches, unlawful acts, unfair treatment, health and safety failures, fraud, dishonesty, harassment, discrimination, retaliation or other inappropriate conduct.
i) **'Confidential Information'** means non-public information relating to the business, its workers, clients, customers, suppliers or partners, including personal data, commercial information and operational information.

5. Our ESG Principles

PayStream is committed to the following principles:

5.1 Ethical Conduct

We will act ethically, honestly and fairly in all dealings with colleagues, workers, customers, suppliers, agencies, contractors and partners.

5.2 Respect, Equality and Inclusion

We will treat others with respect and inclusion, helping to create a workplace where everyone feels valued and supported. We are committed to equality of opportunity and will not tolerate discrimination, harassment, bullying or victimisation.

5.3 Speaking Up

We encourage individuals to raise concerns relating to misconduct, unfair treatment, health and safety, unethical behaviour or non-compliance. Concerns raised in good faith will be treated seriously and retaliation will not be tolerated.

5.4 Responsible Use of Resources

We use resources responsibly by reducing unnecessary printing, saving energy, limiting waste and supporting digital-first ways of working where appropriate.

5.5 Wellbeing and Safety

We are committed to maintaining a working environment that supports physical safety and general wellbeing, and to promoting a healthy and safe workplace.

5.6 Confidentiality and Data Protection

We will protect confidential information and data by handling company, customer and employee information responsibly and in line with applicable data protection, privacy, confidentiality and information security requirements.

5.7 Responsible Decision-Making

We make responsible decisions that consider legal, regulatory, environmental, social, operational and reputational impacts, where relevant.

5.8 Learning and Awareness

We expect relevant individuals to complete mandatory training and engage with reasonable learning and awareness activities relating to ESG, inclusion, compliance, health and safety, confidentiality and responsible business conduct.

5.9 Community and Social Impact

We support community and social impact initiatives where appropriate, including local initiatives, charitable causes and opportunities to contribute positively to communities connected to our operations.

5.10 Good Governance

We help maintain good governance by following company policies, procedures, internal controls and legal or regulatory requirements. Good governance is fundamental to trust, accountability and sustainable business performance.

6. Environmental Commitments

PayStream seek to manage its environmental impact in a reasonable and proportionate manner, taking account of the nature and scale of its operations.

Our commitments include, where practical:

- reducing unnecessary printing and paper consumption;
- promoting digital-first ways of working where appropriate;
- encouraging efficient use of energy and equipment;
- minimising waste and supporting reuse and recycling where available;
- considering environmental factors in operational and supplier decisions where relevant; and
- improving awareness of environmental responsibility across the workforce.

In addition:

- we are committed to minimising our environmental footprint through efficient use of resources and sustainable practices;
- we have developed a Carbon Reduction Plan and measure business emissions annually to identify improvement opportunities;
- our goal is to achieve Net Zero emissions by 2045;
- we have partnered with Positive Planet to support carbon measurement and sustainability improvement;
- as we operate from a managed service office, we promote ways to reduce energy consumption and work with landlords where relevant;
- we consider recommendations from reporting commissioned under the Energy Savings Opportunity Scheme;
- we work with our landlord to promote responsible waste management practices, including recycling and proper disposal methods;
- we seek to adhere to applicable waste separation requirements; and
- while we do not provide company cars, we encourage sustainable transport options and digital meetings where appropriate.

The environmental commitments described above relate primarily to PayStream's internal operations. In relation to our workers, whilst we may not have direct control over the environmental policies or practices of end-clients, we seek to communicate our expectations and encourage responsible behaviours consistent with these commitments.

7. Social Commitments

PayStream is committed to responsible social practices that support people, fairness and inclusion. This includes:

- maintaining a respectful, inclusive and professional working environment;
- promoting equality of opportunity and fair treatment;
- not tolerating discrimination, bullying, harassment or victimisation;
- supporting health, safety and wellbeing;
- encouraging concerns to be raised without fear of retaliation;
- supporting awareness and understanding of responsible business conduct; and
- participating in community or social impact initiatives where appropriate and available.

In support of these commitments, PayStream also aims to:

- provide a healthy and safe work environment and support employee wellbeing;
- provide equal opportunities and encourage personal and professional development through training and development programs;
- support employee wellbeing through initiatives such as PayStream Rewards, covering finance and physical and social wellbeing;
- maintain career pathways of internal staff and, where relevant offer study support for professional and personal development;
- provide an online training platform to internal employees with learning for individuals and managers, and review learning methods and content to improve outcomes;
- promote a positive culture in which everyone is responsible for positively impacting colleagues' working lives and customer experience;

- maintain mandatory training where relevant in Equality, Diversity and Inclusion, Neurodiversity and Anti-Bullying and Anti-Harassment;
- support community initiatives and contribute financially to causes that matter to employees where appropriate;
- transfer part of the Apprenticeship Levy, where appropriate, to support upskilling in smaller businesses through relevant partnerships; and
- prioritise customer satisfaction through high-quality service delivery, transparency, ethical practices, and safeguarding customer privacy and data security.

We are Great Place to Work Certified and take our internal employee survey feedback seriously. In 2026 we were once again, officially certified as one of the UK's Best Workplaces 2025 (Large Category) by Great Place to Work, as well as being listed as one of the UK's Best Workplaces for Women (since 2024). We aim to continually improve the working experience of all our staff.

8. Governance Commitments

PayStream is committed to maintaining effective governance arrangements that support lawful, ethical and responsible operations.

This includes:

- acting with honesty, integrity and accountability;
- complying with applicable laws, regulations, professional standards, contractual obligations and internal requirements;
- maintaining appropriate policies, procedures and internal controls;
- protecting confidential, personal and commercially sensitive information;
- identifying, managing and escalating risks appropriately;
- investigating concerns or suspected breaches where required; and
- making decisions that support responsible and sustainable business practice.

In addition, PayStream aims to maintain robust governance by:

- supporting compliance with regulatory and statutory requirements and professional standards and maintaining relevant accreditations and certifications, including annual review of applicable compliance standards where held. We hold an FCSA accreditation and our adherence to the FCSA's Codes of Compliance is reviewed and certified on an annual basis. We comply with all due diligence requests received from our third-party partners with openness and honesty and we operate with robust internal audit processes in place;
- operating internal audit processes to review processes and compliance across departments and support constructive improvement. Our Internal Audit function has been established to ensure we proactively review our processes and independently review compliance across all departments. We work with department managers to outline any audit findings and ensure a culture of positive and constructive feedback is maintained so that our high compliance standards are upheld;
- vetting business partners before entering contractual relationships and avoiding knowingly working with businesses involved in illegal or non-compliant activity;
- following a structured onboarding and due diligence process for agencies, clients, suppliers and other relevant third parties;
- maintaining staff training and policy review in areas such as GDPR, anti-money laundering, fraud prevention, the Criminal Finances Act and modern slavery;
- operating risk and legal registers to record obligations, controls, mitigations and improvement actions;

- maintaining an information security management system certified to ISO/IEC 27001:2022 and holding Cyber Essentials and Cyber Essentials Plus certifications;
- carrying out security testing internally and with external cyber security support where relevant; and
- operating a procurement process that includes appropriate approval and due diligence requirements, including data protection and information security considerations.

9. Stakeholder Engagement and Continuous Improvement

We actively engage with stakeholders, including employees, customers, suppliers, workers, contractors and regulators, to understand expectations, concerns and feedback. We aim to incorporate relevant perspectives and build long-term relationships based on trust and shared values.

We may use surveys, meetings, supplier communication, regulatory engagement, reporting, feedback, training completion, incident trends and other governance processes to monitor effectiveness and identify opportunities for improvement.

We are committed to continual improvement in ESG performance and will regularly review and update our initiatives, controls and priorities as appropriate.

10. Roles and Responsibilities

10.1 ESG Steering Team

PayStream have established an ESG steering team made up of Directors, Managers and representative members of our workforce. This way we can reflect on ESG matters that are important to our staff, agencies, clients, customers and any other stakeholders.

The key people involved in reviewing and executing our ESG strategy are:

Name	Role
Andrew Cleal	Chief Executive Officer
Jayne Stirrup	Chief Financial Officer
Clare Baker	HR Director

Members of the ESG steering committee also include:

Name	Role
Kerry Hull	Marketing Director
Dave Johnson	Head of Legal
Cheryl Cooper	Ledger Control Assistant
Aiden Cooper	Customer Care Expert
Ploy Kranz	IT Support Technician
Nicola Collins	Screening Sales Manager
Sarah Khursheed	Senior Payroll Administrator
Andrew Eggleston-Essex	Database Developer

In addition, we promote responsible behaviours and encourage all our staff to get involved and offer suggestions in how we manage our ESG commitments.

The ESG Steering Team is responsible for:

- providing oversight of this policy and the organisation's ESG approach;
- promoting a culture of ethical, responsible and compliant conduct;
- ensuring appropriate governance arrangements are in place;
- reviewing material ESG risks, issues or themes where relevant;
- administration support for this policy and for receiving feedback on the policy where appropriate;
- investigations, training, awareness or reporting;
- monitoring compliance themes or risks; and
- periodic review and governance reporting.

10.2 Policy Owner

The Regulatory Compliance Team is responsible for:

- maintaining and updating this policy;
- ensuring the policy remains aligned with business needs and relevant legal or regulatory requirements;
- coordinating periodic review of the policy;
- supporting implementation and communication of the policy;
- advice on policy interpretation and implementation; and
- escalating material issues relating to policy compliance, where appropriate.

10.3 Managers

Managers are responsible for:

- leading by example and promoting the standards set out in this policy;
- supporting a respectful, inclusive and safe working environment;
- ensuring team members are aware of relevant responsibilities;
- encouraging concerns to be raised and addressed appropriately; and
- taking reasonable steps to address or escalate suspected breaches.

10.4 Workers

All workers are responsible for:

- acting ethically, honestly and professionally;
- treating others with respect and inclusion;
- following health and safety requirements;
- handling confidential information and personal data responsibly;
- using company resources responsibly;
- complying with company policies, procedures and applicable legal obligations;
- participating in required learning or awareness activities; and

- raising concerns about suspected misconduct, unsafe practices, unfair treatment or unethical behaviour.

11. Speaking Up and Reporting Concerns

Any individual covered by this policy is expected to raise concerns about suspected misconduct, unfair treatment, health and safety risks, unethical behaviour, policy breaches or legal/regulatory non-compliance through the appropriate internal channels.

Concerns raised in good faith will be taken seriously and handled in line with relevant company procedures. Retaliation against any individual for raising a genuine concern or participating in an investigation will not be tolerated.

12. Training and Awareness

PayStream may provide training, communications or awareness activities relevant to this policy and associated topics, including ESG, equality, inclusion, compliance, health and safety, confidentiality, information security and responsible business conduct.

All relevant individuals are expected to complete mandatory training and engage appropriately with reasonable awareness initiatives.

13. Breaches of this Policy

Failure to comply with this policy may result in action in accordance with applicable company procedures and, where relevant, contractual terms. This may include disciplinary action, termination of engagement or other appropriate corrective measures.

Suspected unlawful conduct may also be referred to the appropriate authorities where necessary.

14. Monitoring and Review

This policy will be reviewed periodically and at least annually, or earlier where required due to changes in law, regulation, business operations or internal governance requirements

Its effectiveness may be monitored through reporting, feedback, training completion, incident trends, stakeholder engagement and other governance processes considered appropriate by the business.