

ESG Policy

Denton Associates (London) Limited

October 2025

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1. Purpose

Since our founding 30 years ago, DENTON has operated with integrity, transparency, and accountability—principles that continue to define our approach as a Design & Build company. This approach has served us well and has helped to create a well-respected responsible business.

In 2022, the Board formalised commitments by implementing an Environmental, Social, and Governance (ESG) policy, aligning operations with long-standing sustainability values and business objectives.

Our ESG framework is built on three pillars:

- **Openness:** Full disclosure underpins trust and accountability. If something is not disclosed, then there is something to hide.
- **Governance:** Structured oversight, informed by Institute of Director’s corporate governance training.
- **Clarity:** Targets that drive meaningful progress.

Integrating ESG into our operations enhances resilience and long-term value, reinforcing our commitment to responsible growth.

1.1. Scope

This policy applies across the entire organisation, embedding ESG considerations into DENTON’s governance structures, operational frameworks, and strategic decision-making. Our commitment extends beyond our direct operations to our suppliers, partners, and the wider value chain. We engage with clients, investors, and supply chain partners who demonstrate alignment with our ESG standards, supporting consistent ethical conduct, effective risk management, and long-term sustainable performance.

DENTON’s ESG strategy underpins long-term value creation by enhancing operational resilience, strengthening competitive positioning, and supporting transparent, measurable, and responsible growth in line with stakeholder expectations and recognised ESG frameworks.

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2. ESG Pillar 1: Environmental

2.1. Introduction

DENTON is committed to reducing its environmental impact by alignment with UK Government initiatives and the company’s core value of operating as a “responsible business.” Since inception, DENTON has pursued a proactive environmental strategy, applying sustainability assessment schemes such as SKA for Offices and BREEAM. This commitment extends to Carbon Net Zero strategies, strategic partnerships, and training courses. Our environmental journey began in 2009 with third-party accreditation under ISO 14001. Since then, we have measured, monitored, and recorded environmental indicators. In 2022, we introduced an “Environmental Policy” and a “Good Practice” policy. These initiatives were strengthened in 2024 with the launch of our “Responsible Procurement Policy” and “Carbon Reduction Plan”.

2.2. Environmental Management Framework

2.2.1. ISO 14001 accreditation (since 2009)

DENTON has maintained a third-party ISO 14001 accreditation for nearly two decades. We recently updated our environmental policy to align with our operational practices.

2.2.2 DENTON’s “Good Practice” Policy (since 2022)

DENTON’s “Good Practice” environmental standards comprise internal measures and procedures applied at no additional cost across all projects, delivering added value to our clients. The policy includes:

- Building Regulation compliance. These statutory standards apply as a minimum. We work with our Approved Building Inspectors to achieve compliance.
- ISO 14001 Environmental Policy integration.
- Risk-mitigation approach. This approach applies to all our business operations and performance evaluation to address uncertainties.
- Waste/Resources management strategy. We have built reliable partnerships. We transfer company-site waste through an approved supply chain of transfer stations and material recovery facilities. We aim to recycle 100% of non-hazardous waste.
- Water and Energy monitoring. We monitor water and electricity consumption, with the aim to reduce usage and improve efficiency.
- Use of local Manufacturers and Installers. We promote the use of locally manufactured products to reduce carbon footprints, supports sustainability goals and contribute to net-zero aspirations.
- Application of the SKA Assessment Scheme for Offices. Clients are encouraged to achieve the highest environmental standards and pursue a certified SKA accreditation through use of SKA assessment methodology and benchmarking tool for office projects.

2.2.3. Responsible Procurement Policy (Established 2024)

DENTON’s Responsible Procurement Policy (RPP) provides a framework for sourcing materials, services, and subcontracts. It guides the specification and procurement of sustainable construction products and services and is aligned with BREEAM requirements.

Through this policy, DENTON influences its supply chain to reduce environmental impact and conserve natural resources, ensuring that materials are responsibly sourced.

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2.2.4. Net Zero and Carbon Reduction Plan (Established 2024)

In alignment with UK government targets, DENTON is committed to reducing its greenhouse gas (GHG) emissions:

By 2030: Halve Scope 1 and Scope 2 CO₂e emissions, using FY24 as the baseline.

By 2050: Achieve Net Zero emissions across Scope 1, 2, and 3, offsetting only a residual 10%.

As a business providing design and build services, DENTON has a relatively small Scope 1 and 2 footprints, with no owned vehicles and two leased office spaces.

Our GHG inventory is reported within our Carbon Reduction Plan (CRP), in accordance with the Greenhouse Gas Protocol Initiative.

GHG Emission Scopes Explained:

Scope 1 (Direct): Emissions from sources owned or controlled by DENTON, such as fuel, fuelled vehicles, and emissions from refrigeration, air conditioning, and fire suppression systems.

Scope 2 (Indirect): Emissions from the generation of purchased electricity consumed by DENTON.

Scope 3 (Indirect): All other indirect emissions resulting from DENTON’s activities, but from sources not owned or controlled by the company. This includes emissions from our asset, purchase goods and services, upstream transportation and distribution, business travel, employees commuting and waste generated in operations.

2.2.5. Risk Reduction

We recognise our responsibility to address global climate change.

We mitigate operational risks through regulatory compliance and ISO-certified procedures covering Sustainability, Environmental Management, and Health & Safety.

2.2.6. Cost Savings and Resource Optimisation

We aim to reduce costs by:

- Improve energy efficiency via optimised systems, green energy switch, consumptions monitoring and assessment.
- Cutting travel expenses via hybrid work and video conferencing, where possible.
- Enhance wellbeing to lower turnover, sick leave, and recruitment costs.
- Using local suppliers to reduce supply chain costs.
- Treating waste as a resource: minimising its production and recycling 100% of it.

2.2.7. SKA Assessment Scheme for Offices

Our SKA team works closely with clients to promote and implement environmentally responsible practices. Using SKA assessment techniques, we aim to minimise environmental impact from design to post-construction. Projects are rated at bronze, silver, or gold levels, and clients receive a SKA certificate upon completion.

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2.2.8. Environmental Product Declarations (EPDs)

Environmental Product Declarations (EPDs). We encourage clients to adopt materials and products with an Environmental Product Declaration (EPD). An EPD transparently communicates a product’s environmental performance and impact throughout its lifecycle. By enabling comparisons between products, EPDs support carbon reduction strategies and help clients make informed, sustainable choices.

2.3 Partnerships and Collaboration

2.3.1. Heart of the City Partnership

In August 2024, DENTON partnered with Heart of the City to strengthen our commitment to become a responsible business practice. We sought expert guidance to become a "force for good". Through workshops, one-to-one support, and mentoring, we’ve made meaningful progress in embedding responsibility into our operations.

Our journey began with the Climate Change for SMEs: 4 Steps to Action course, which we completed in October 2024. DENTON received certificates for each module, along with a graduate logo.

This course was instrumental in shaping DENTON’s Carbon Reduction Plan, including relevant carbon calculations aligned with the Green House Gas Protocol. The Heart of the City team validated our Plan, confirming that we are on the right trajectory to mitigate the environmental impact of our business activities.

Following this success, Heart of the City invited DENTON to join a second programme: the Responsible Business Foundation course. This initiative helped us explore how we can better support our local community, mitigate our environmental impact, foster workforce diversity, and enhance employee wellbeing.

2.3.2. Training and Collaboration

Commitment to Training. DENTON is committed to Continuous Professional Development. Employees participate in-house and external training programmes.

In 2022, DENTON trained six in-house staff to achieve the “SKA Assessor for Offices” qualification. This expertise is now offered to clients as part of our in-house support services.

We collaborate with our largest contractors to implement DENTON’s “Good Practice Standards”. Our goal is to document the environmental practices within our supply chain, support their implementation, and raise awareness of DENTON’s environmental standards and national sustainability assessment schemes.

2.4 Continuous Improvement and Accountability

DENTON is committed to the continual improvement of its environmental performance.

We regularly measure, monitor, and review our progress against established objectives and targets to ensure compliance with current legislation, industry standards, and our own high expectations. Environmental data and performance indicators are reviewed at board level to inform decision-making and drive ongoing improvement.

Through transparent reporting, third party audits, and open communication with our stakeholders, we maintain accountability and ensure our practices remain aligned with recognised best-practice frameworks, including ISO 14001 standard, Green House Gas Protocol, UK Net Zero Carbon Building Standard. SKA, BREEAM, LEED, etc.

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3. ESG Pillar 2: Social

3.1 Introduction & Commitment to Social Value

At DENTON, we recognise that our responsibility extends beyond the spaces we design and build — it's about the people and communities those spaces serve. As a business built on collaboration and trust, we understand that success is measured not only in commercial outcomes, but in the positive, lasting impact we create for our employees, clients, and local communities.

We are committed to operating responsibly and creating a meaningful social impact in the communities where we work. As a leading office design and fit-out business, we recognise our opportunity and responsibility to contribute to society through our projects, operations, and partnerships. Social value is embedded in our culture and integrated into how we deliver work across the UK.

Through employment, education, community engagement, and wellbeing initiatives, DENTON strives to make a measurable difference — helping to build a more inclusive, sustainable, and connected future for all those we work with.

3.2 Delivering Social Value

DENTON tailors social value delivery to the specific needs of each project and community. Our actions create meaningful, measurable impact. Our approach integrates with project planning from the outset, allowing us to align our objectives with those of our clients and local stakeholders.

We achieve this by:

- Using the Social Value Portal and the National TOMs framework to track, measure, and transparently report on project outcomes, including monetised social value contributions.
- Embedding social value goals into project delivery plans, ensuring every initiative is purposeful and accountable.
- Collaborating with clients, partners, and suppliers to maximise shared benefits.

3.3 Community Engagement & Social Impact

We've worked with charities like Mustard Tree and The Movement Centre, donating time and materials and taking part in volunteering and fundraising days. Our team has also supported toy, clothes and food drives.

We support the next generation of talent by hosting careers workshops and panel talks in local schools and universities, highlighting pathways into construction, design, and marketing. For example, we collaborate with students from Manchester Metropolitan University's Interior Architecture course, offering careers days that provide insight into our work, demonstrate how we collaborate with wider project teams, and showcase live project environments.

We encourage our team to give back through volunteering hours that support local community gardens, shelters, and skill-based initiatives. This includes volunteering with charities such as Mustard Tree and Coffee4Craig, where our team supports their vital work in tackling homelessness, poverty, and social exclusion. Through these activities, we contribute time, skills, and resources to make a tangible difference within our local communities.

We support the circular economy by donating surplus furniture to local charities and community hubs, including organisations such as Mustard Tree. This reduces waste, diverts items from landfill, and ensures valuable resources are reused to benefit those in need.

We develop and deliver project-specific social value plans to ensure that each fit out we complete generates meaningful, measurable community impact. These plans are tailored to the client's values, local needs, and project

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context, covering initiatives such as employment opportunities, education engagement, wellbeing, and environmental performance.

For example, our project for Hill Dickinson’s Manchester office included dedicated mentoring programmes to support young people interested in careers in design and construction, as well as volunteering targets for our project team and supply chain. These activities provide direct community benefit, foster collaboration, professional development, and shared purpose across the project.

3.4 People and Employment

3.4.1 Recruitment

DENTON strives to attract and retain talented individuals who are motivated by purpose and responsibility. Our culture is built on shared values that are understood and actively embraced across the business.

By championing our ESG commitments, we enhance our reputation as an employer of choice for professionals who share our principles and seek to make a positive impact through their work.

3.4.2 Team Cohesion

DENTON’s ESG policy reinforces the connection between our business values and those of our employees. This alignment shapes a unified culture rooted in integrity, transparency, and collaboration. It also strengthens our long-term credibility as a responsible business—ensuring every member of the team feels part of our collective purpose and success.

3.4.3 Skills Development and Training

We actively promote education and continuous learning both within our business and in the wider community. Internally, we invest in staff development through dedicated training budgets and monthly knowledge-sharing newsletters designed to upskill teams and encourage collaboration.

We also contribute to external learning by delivering employability workshops and career talks in schools and universities, including Manchester Metropolitan University and Sale Grammar School. Our employees are supported through CPD-accredited training in areas such as sustainability, design software, and health & safety — ensuring professional growth and alignment with our responsible business values.

3.5 Health, Wellbeing & Workplace Experience

We design for wellbeing — prioritising natural light, biophilic elements, and acoustic comfort across all our projects. Internally, our Mental Health First Aiders and wellness days support employee wellbeing throughout the year.

Our own workplace reflects these values. The DENTON office is **SKA Gold Rated**, designed specifically to promote health, wellbeing, and productivity. The space includes a variety of facilities to support different ways of working and connecting — from breakout areas and quiet booths to adjustable desks, meeting rooms, and a front-of-house entertainment suite. Together, these elements create an environment that enhances comfort, collaboration, and creativity, setting the standard for the spaces we deliver for our clients.

3.6 Local Economy & Supply Chain

Supporting local suppliers and SMEs. We prioritise engaging SMEs within the project’s local authority area. On a recent central Manchester fit out, over 50% of the supply chain was sourced within the Greater Manchester area.

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Hiring local subcontractors and tradespeople via partnerships with local authorities and business networks to reduce supply chain costs.

3.7 Measuring and Reporting Our Impact

We are committed to transparent, accountable reporting. Social value outcomes are measured using:

- The Social Value Portal, aligned with the National TOMs (Themes, Outcomes and Measures) framework.
- Client-specific social value reports, including metrics on community investment, volunteer hours, local employment, and SME spend.

3.8 Our Commitments and Future Goals

We are proud of our impact and are committed to scaling further. Our goals include:

- Increasing our community investment year-on-year, measured through volunteer hours, charitable contributions, and skills-sharing activities.
- Becoming a recognised leader in social value delivery within the office interior sector.
- Strengthening partnerships with organisations like Heart of the City and local employment initiatives.
- Embedding responsible business practices into project delivery and supply chain management.
- This policy is reviewed annually to ensure it reflects our evolving priorities, community needs, and industry best practice.

4. ESG Pillar 3: Governance

4.1 Introduction & Commitment to Best Practice

DENTON’s governance framework is founded on integrity, accountability, and transparency. We apply recognised best practice standards to ensure responsible decision-making, ethical conduct, and sustainable growth.

In 2022, the DENTON Board successfully completed the Institute of Directors' Certificate in Corporate Governance. ESG is now a standing item at Board level, ensuring ongoing oversight of environmental, social, and ethical performance across the business.

4.1.1 Compliance with the Companies Act 2006

DENTON’s governance framework aligns with the principles set out in the Companies Act 2006, which defines directors’ duties and ensures businesses operate responsibly, transparently, and in the best interests of their stakeholders.

In particular, we uphold Section 172 — promoting the long-term success of the company while considering the impact of our decisions on employees, clients, suppliers, communities, and the environment. This alignment underpins our approach to integrity, accountability, and responsible growth.

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4.2 Governance Framework and Oversight

ESG is embedded within DENTON's strategic decision-making. Oversight is provided by the Board and Senior Leadership Team, supported by the **Sustainability, Quality & Compliance Committee** which meets quarterly to review progress against ESG goals, risks, and compliance standards.

The Board reviews ESG performance quarterly and ensures alignment with the Bowmer + Kirkland Group governance principles, the UK Corporate Governance Code, and ISO 14001 and 9001 standards.

4.3 Policies and Ethical Conduct

We operate under a suite of governance policies that define how we work responsibly. These include our **Anti-Bribery and Corruption, Whistleblowing, Modern Slavery, Data Protection, and Responsible Procurement** policies.

All employees and suppliers are required to comply with these standards, which are reinforced through training, performance reviews, and supply chain engagement. Policies are reviewed annually and are publicly available on our website for full transparency.

4.4 Risk Management and Internal Controls

We maintain robust internal controls to identify, monitor, and mitigate operational, financial, and ESG-related risks. Key risks and mitigation actions are reviewed during monthly board meetings and reported to the Bowmer + Kirkland Group.

Cybersecurity and data protection are key priorities, with systems regularly audited and staff trained to ensure compliance with **GDPR** and ISO-aligned data security protocols.

4.5 Fairness and Ethical Culture

We are committed to maintaining a fair, inclusive, and respectful workplace. Our open-door policy encourages open communication, and we provide secure, anonymous reporting channels for unethical behaviour, discrimination, or fraud.

Conflict of interest declarations are completed annually by senior employees to safeguard impartial decision-making.

4.6 Transparency and Accountability

We have operated as an open and honest business for nearly three decades, building relationships on trust and integrity. Our cost plans are fully transparent and detailed, and our annual returns provide a clear overview of performance and strategic direction.

All key policies, ESG updates, and governance disclosures are available on our website, reinforcing accountability and accessibility for all stakeholders.

4.7 Stakeholder Engagement

We regularly engage with our clients, employees, and partners to ensure governance decisions reflect stakeholder priorities. Feedback informs our ESG targets and helps us continuously strengthen our approach to responsible business practice.

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4.7.1 Board Meetings

We hold comprehensive monthly Board meetings, chaired by our chairperson. Minutes are provided for all meetings.

4.7.2 Executive Management Meetings

We maintain a structured schedule of executive meetings to ensure effective planning and oversight:

- Resource Planning – Weekly
- Finance Committee – Monthly
- Operations – Weekly
- Health & Safety – Monthly
- Marketing – Weekly
- Sustainability, Quality & Compliance – Monthly
- Sales – Weekly
- Environmental Management - Annually

5. DENTON ESG Targets and Commitments

5.1 Overview

DENTON’s ESG targets and commitments define how we measure progress and accountability across our Environmental, Social, and Governance pillars. These targets are reviewed annually to ensure they remain relevant, measurable, and aligned with evolving best practice and client expectations.

5.2 Environmental Targets and Commitments

- Publish an annual ESG report
- Provide detailed waste management reports
- Provide detailed water and electric reports
- Achieve 0% waste to landfill by 2030
- Reduce Scope 1, 2, and 3 greenhouse gas emissions across our offices and operations, in line with our Carbon Reduction Plan targets.

5.3 Social Targets and Commitments

- Increasing our community investment year-on-year, measured through volunteer hours, charitable contributions, and skills-sharing activities.
- Embedding responsible business practices into all aspects of project delivery and supply chain management.

5.3 Governance Targets and Commitments

- Make all relevant policies available via the DENTON website.
- Comply to ISO 14001, ISO 45001, ISO 27001, ISO 9001 standards.
- Review DENTON “Good Practice”, “Responsible Procurement”, “Environmental”, “CSR” and “ESG” policies regularly.



Richard Douglas
 9th January 2026

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