

# ESG Statement

## 1. Purpose

TPMG is committed to operating in a responsible, ethical and sustainable way.

This ESG Statement explains the principles TPMG applies in relation to environmental, social and governance matters across its business activities. It is intended to give clients, suppliers, learners, partners and other stakeholders confidence that ESG is treated as a meaningful part of governance, delivery and long-term business resilience, not simply a marketing statement. This reflects the same strategy-led, stakeholder-aware approach that appears throughout your example ESG materials.

---

## 2. Scope

This Statement applies to TPMG's business activities, including:

- advisory, assurance and audit services;
- training, e-learning and digital products;
- digital systems setup and operational enablement;
- supplier, partner and subcontractor relationships;
- office-based, remote and client-facing delivery;
- procurement, governance and reporting arrangements; and
- the wider conduct of TPMG as a business.

It is designed to provide an overarching public statement of intent and approach. More detailed related statements and policies may sit alongside it, including those relating to health and safety, environment, information security, data protection, anti-bribery, whistleblowing and supplier conduct.

---

### **3. What ESG Means to TPMG**

TPMG recognises that ESG covers three connected areas:

#### **Environmental**

How business activities affect the natural environment, including resource use, waste, travel, emissions and environmental decision-making.

#### **Social**

How TPMG behaves towards people, including clients, workers, learners, suppliers, contractors, communities and other stakeholders.

#### **Governance**

How TPMG is directed, controlled and held accountable, including ethics, transparency, decision-making, risk management and oversight.

This structure directly reflects the framing used in your example ESG strategy, policy checklist and committee terms of reference.

---

### **4. Our Commitment**

TPMG is committed to:

- acting responsibly and with integrity;
- considering ESG factors in the way it operates and makes decisions;
- reducing avoidable negative impact and encouraging positive outcomes where reasonably practicable;
- supporting transparent, ethical and evidence-led delivery;
- encouraging responsible conduct within its wider supply chain and delivery

network; and

- reviewing and improving its ESG approach over time.

TPMG recognises that the ESG issues most relevant to a business depend on its size, sector, operating model and stakeholder expectations. Your example strategy documents make the same point, noting that ESG means different things to different organisations and should be approached proportionately and with reference to material issues.

---

## 5. Legal and Governance Context

TPMG recognises that directors of UK companies have duties under the Companies Act 2006, including the duty under section 172 to act in the way they consider, in good faith, would promote the success of the company while having regard to wider stakeholder factors. ([legislation.gov.uk](https://legislation.gov.uk)) Your example board materials explicitly connect ESG strategy and governance with section 172 considerations and routine board decision-making.

TPMG also recognises that some ESG-related legal obligations apply only to certain organisations depending on their size, structure and activities. For example, annual modern slavery statements are legally required only for certain organisations supplying goods or services in the UK with annual turnover of £36 million or more, and UK SECR reporting applies to quoted companies and certain large unquoted companies and LLPs. ([gov.uk](https://gov.uk)) ([gov.uk](https://gov.uk)) TPMG's approach is therefore to apply proportionate, practical ESG governance that is relevant to its actual risks, stakeholders and growth ambitions.

---

## 6. ESG Principles

TPMG's ESG approach is guided by the following principles:

### 6.1 Materiality

Focus should be placed on the ESG matters that are most relevant to TPMG's activities, stakeholders and risk profile.

## **6.2 Proportionality**

Commitments should be realistic, achievable and appropriate to the organisation's size and operating model.

## **6.3 Accountability**

Responsibilities for ESG-related matters should be clear and capable of being reviewed.

## **6.4 Transparency**

Stakeholders should be able to understand TPMG's commitments, expectations and overall approach.

## **6.5 Continuous Improvement**

ESG performance and maturity should strengthen over time through review, feedback and practical action.

These themes are clearly reflected in your example strategy, policy checklist and committee documents.

---

# **7. Environmental Commitments**

TPMG aims to reduce unnecessary environmental impact and make proportionate, sensible environmental decisions across the business.

This includes, where reasonably practicable:

- reducing waste and encouraging re-use and recycling;

Document ID: TPMG-POL-014

Title: ESG Statement

Version: 1.0

Status: Approved

Approved by: Giedre Beige - Director



- using resources and energy more efficiently;
- reducing unnecessary travel and using remote methods where appropriate;
- considering environmental factors in procurement and supplier choices;
- supporting better environmental awareness in day-to-day operations; and
- improving environmental performance over time.

This is consistent with the environmental objectives and examples in your ESG checklist documents, including resource efficiency, travel reduction, waste minimisation, recycling, environmental awareness and continual improvement.

TPMG may also support clients with environmental and carbon-related governance, but this does not mean TPMG makes unsupported environmental claims on behalf of clients. Where TPMG supports ESG readiness or reporting, the focus is on clear ownership, defensible evidence and practical governance.

---

## 8. Social Commitments

TPMG recognises that social responsibility covers the way it treats people and the standards it expects within its wider delivery environment.

TPMG therefore aims to:

- support a respectful, inclusive and professional working culture;
- promote dignity, fairness and equal opportunity;
- avoid discrimination, harassment, bullying and other inappropriate conduct;
- support safe working and workforce wellbeing;
- encourage responsible supplier and contractor behaviour;
- value learning, development and competence; and
- act responsibly towards clients, learners, partners and communities.

These priorities closely reflect the social objectives in your ESG policy checklist and supplier code examples, including diversity, wellbeing, health and safety, fair treatment, learning, community impact and supply-chain standards.

TPMG also recognises the importance of preventing modern slavery, forced labour, child labour and other human rights abuses within the supply chain and wider business ecosystem. Where appropriate, TPMG expects suppliers and partners to operate to comparable standards of lawful and ethical conduct. Your example supplier code takes the same approach.

---

## 9. Governance Commitments

TPMG recognises that ESG only becomes meaningful when supported by good governance.

TPMG therefore aims to maintain:

- clear business ethics and responsible decision-making;
- appropriate internal oversight and accountability;
- transparent conduct and open communication where relevant;
- proportionate risk management and control;
- a culture of integrity, confidentiality and professionalism;
- suitable policies and statements covering key governance areas; and
- supplier and partner expectations that support lawful and ethical delivery.

This aligns strongly with the governance sections of your ESG checklist and supplier code materials, including anti-bribery, transparency, risk management, governance structures, ethics and internal controls.

Where appropriate, TPMG may embed ESG considerations into decision-making, service design, supplier engagement and internal review processes in a way that is proportionate to the business and relevant to the issues being considered.

---

## 10. Suppliers, Partners and Delivery Network

TPMG recognises that ESG performance is influenced not only by its direct activities,

but also by the behaviour and standards of those it works with.

Accordingly, TPMG may expect relevant suppliers, contractors, partners and specialist contributors to:

- act lawfully and ethically;
- support appropriate environmental, social and governance standards;
- comply with applicable legal and contractual requirements;
- protect people, data and reputation;
- cooperate with reasonable due diligence or assurance requests; and
- support TPMG's wider standards for responsible delivery.

This approach reflects the supplier-code and legal-compliance-clause model in your uploaded ESG examples, including expectations around compliance, self-certification, audit rights and continuing adherence to customer policies.

---

## 11. Measuring, Reviewing and Reporting

TPMG aims to ensure that ESG is not treated as a one-off statement.

Where relevant and proportionate, TPMG may:

- identify priority ESG themes;
- review risks and opportunities;
- assess the usefulness of existing policies and practices;
- update controls, statements or supplier expectations;
- gather feedback from relevant stakeholders; and
- report progress or commitments through appropriate channels, including website disclosures or stakeholder communications.

This follows the same audit-baseline-objectives-measurement structure found throughout your example ESG strategy documents.

---

## 12. Board Oversight and Internal Governance

TPMG recognises that ESG is most credible when it is overseen properly.

Depending on the size, maturity and needs of the business, ESG-related matters may be addressed through:

- leadership and director oversight;
- routine management review;
- integration into existing governance and risk arrangements;
- designated ownership of ESG-related actions; and
- periodic review of priorities, controls and reporting.

Your example board minutes and committee terms of reference reinforce the value of integrating ESG into board decisions, committee oversight, action tracking and regular review.

---

## 13. Continuous Improvement

TPMG does not treat ESG as fixed or complete.

The business expects ESG-related arrangements to evolve over time in response to:

- growth and organisational change;
- stakeholder expectations;
- legal and regulatory developments;
- client and supply-chain requirements;
- operational learning; and
- opportunities to strengthen governance, reporting or delivery standards.

This continuous-improvement approach is a core feature of your example ESG framework documents.

---

Document ID: TPMG-POL-014  
Title: ESG Statement  
Version: 1.0  
Status: Approved  
Approved by: Giedre Beige - Director



## 14. Statement on Standards and Certification

TPMG applies structured methods aligned to recognised good practice, proportionate governance and practical assurance principles.

Unless expressly stated elsewhere in formal TPMG documentation, this Statement does **not** claim that TPMG is currently certified to any particular ESG, sustainability or governance standard. Where formal certifications, recognised frameworks or validated reporting arrangements are achieved, they may be referenced separately and supported by appropriate evidence.

---

## 15. Contact

Questions about this Statement or TPMG's approach to ESG may be directed to:

### **TPMG**

A trading style of TPMG Group Ltd  
Cardinal Point, Park Road, Rickmansworth, WD3 1RE

**Tel:** 020 7060 6228

**General enquiries:** [admin@tpmg-group.com](mailto:admin@tpmg-group.com)

**Data Protection Officer:** [dpo@tpmg-group.com](mailto:dpo@tpmg-group.com)

**Website:** [www.tpmg-group.com](http://www.tpmg-group.com)

---

## 16. Disclaimer

This Statement is intended to provide a high-level public summary of TPMG's ESG approach. It does not describe every internal process, policy, supplier arrangement, governance mechanism or operational control used by TPMG, and TPMG may amend or strengthen its approach from time to time in response to operational, client, legal or risk-based requirements.