Sustainability report

Responsible business:
our commitment

Wilmington exists to empower its customers to do the right business in the right way. At the heart of this commitment to customers is our own ambition to embed a responsible business culture that informs the way we work. Whilst this ambition represents a long-standing commitment, the significant changes experienced over the last 18 months highlighted the need to refine our approach to sustainability so that the work we do delivers greater value to all our stakeholders.

Materiality analysis

Sustainable business growth is a key component of our strategy, and therefore the priority when refining our approach to ESG was to ensure that it was strongly aligned to our broader strategic objectives. During the year we performed a materiality assessment to identify the key issues that will inform our work in this area and used these to build a corresponding framework to drive progress going forward.

By taking a holistic approach to materiality, we considered a wide range of factors to develop a bespoke sustainability framework for Wilmington.

Factor	Relevance when identifying material issues
Stakeholder engagement	We strive to create long term value for all our stakeholders, and positive engagement is central to this as detailed in our Section 172 statement on page 16. The core objective of our materiality analysis was to ensure that our sustainability initiatives are aligned to the interests of our key stakeholders. The materiality assessment process included reference to customer insight, employee engagement survey feedback, consideration of industry and peer group trends, a third party led workshop with senior leaders, and Board participation with reference to shareholders' objectives and values.
Operating model	The success of our business is underpinned by our dynamic operating model, which focusses on operational excellence in four key areas as discussed on pages 13 to 15. The materiality analysis performed helped us to develop a sustainability framework that is closely aligned to these four areas. The core values defining each pillar of the strategy will support the business processes that help us to achieve operational excellence, as shown in the strategy summary below.
Risks	The sustainability initiatives we implement will play a valuable role in supporting the actions we take to mitigate our principal risks. Within our risk review, we have mapped each pillar of our sustainability strategy to the risks they help to mitigate.
Global change and influence	We recognise that we operate in an increasingly complex socio-economic environment, and that global challenges such as the Covid-19 pandemic, and the climate crisis, have the potential to significantly impact our key stakeholders. We therefore recognise that we have a role to play in making a positive contribution towards overcoming global issues. Accordingly we have given consideration to how our approach to address material issues aligns to efforts to advance the sustainable development goals.

The conclusion of our materiality assessment was that Wilmington's responsible business culture reflects a set of four core values, each of which underpins a pillar of our sustainability strategy framework. A summary of the strategy is set out below.

Core value and strategic pillar	Cultural positivity	Customer empowerment	Proactive assurance	Environmental responsibility
Core objective	Create equal opportunities and nurture talent in a safe and mindful environment.	Deliver products that are accessible, high value, up to date and move with industry trends.	Uphold high standards related to digital protection, regulatory requirements, ethics & production.	Reduce environmental impact by minimising carbon footprint and committing to responsible procurement.
Supporting operational excellence: • People • Product • Sales & Marketing • Technology & Data	Fostering a positive culture will enhance employee experience and allow our **people** to perform highly as they continue to drive progress against our strategic objectives.	Empowering our customers ensures our **products** are aligned to their needs, and that our **sales and marketing** strategies effectively convey high product value.	Responsible digitisation and ethical conduct are fundamental to our **data and technology** strategies as we innovate to deliver the best-in-class digital **products**.	Committing to environmental responsibility protects the future of our **people** and demonstrates to customers that we strive to deliver **products** with minimal environmental impact.

As we continue to develop our approach and drive progress against the core objectives of each pillar, a governance framework has been established to ensure we maintain accountability and benefit from engagement across the business.

Core value and strategic pillar	Cultural positivity	Customer empowerment	Proactive assurance	Environmental responsibility
Board oversight		Chair		
Executive sponsor	Chief People Officer	Chief Executive Officer	Chief Technology Officer	Chief Financial Officer
Strategic lead		Group Finance and Sustainability Director		
Taskforce		Dedicated working groups with portfolio business and shared service representation		

The ongoing work to drive progress against the core objective of each pillar is discussed on pages 14 and 15.

Sustainability report continued

Cultural *positivity*

The adaptability, creativity and motivation of our people is critical to the Group's success. We are therefore committed to promoting a positive culture that creates equal opportunities and nurtures talent in a safe and mindful environment. Classifying this core value as an underlying pillar of our sustainability strategy was informed by three areas of focus identified as part of our materiality assessment, being Health & Wellbeing, Training & Development, and Diversity & Inclusion.

Health & Wellbeing

We believe that health and wellbeing initiatives are a core component in achieving the full potential of our people. When our employees are healthy, happy, and motivated we know that they are best placed to achieve positive outcomes and to drive the innovation, creativity and dedication that fuels sustainable business growth.

Throughout the year we placed significant emphasis on maintaining a high level of support for our employees globally, as they continued to face challenges brought about by the Covid-19 pandemic. We have a permanent resource bank to support good health and wellbeing, which is supplemented on an ongoing basis with topical events and initiatives to provide ongoing assistance to our people. Further details of the supplementary resources we have provided in this area during the year are detailed in our people report on page 10.

Wellbeing resources available to our people:

Global employee assistance programme	A programme designed to offer the following benefits to every employee across the Group: • Local telephone helplines providing expert led support 24 hours a day, 365 days a year in local languages • Access to psychologists and counsellors who can support in areas such as family and relationship problems, stress, work issues, emotional distress, major life events, healthcare concerns, and financial and legal concerns • Up to six sessions of scheduled counselling delivered via video/phone • Provision of these services for employees and their immediate family members
Digital GP	This service provides UK employees with 24/7 access to digital medical services, making it easier than ever for our people to look after their health. The flexibility it offers means it can be used on the go at any time, encouraging individuals to prioritise their wellbeing in a way that fits around their existing commitments.
Mental Health Support	Our Mental Health First Aider programme delivers training to ensure every business or function within the portfolio is supported by a qualified individual. This training, along with our mental health awareness initiatives, are designed to equip individuals across all parts of our business with skills to support those struggling with mental health challenges.

Training & Development

We seek to echo the ambition of our training businesses within our own workforce, by looking for new and engaging ways to develop individuals and teams. As outlined in our strategy, we recognise the need for continued development and upskilling of our teams in order to drive progress against our four areas of operational excellence. Our key commitments to training and development demonstrated in FY21 are outlined below.

Commitment	Resources and delivery
Promoting strong leadership	• Bespoke managers training programme • 'Managers' Toolkit' – dedicated intranet site providing resources to help managers navigate the challenges of supporting their teams • 'Leaders lounge' – intranet site designed to guide managers through business change
Sales and Product Academies	Launched the Wilmington product academy and rolled out the Wilmington Sales academy in FY21, upskilling our sales and product teams to deliver excellence in these areas.
Apprenticeships	We continue to invest in new talent through our apprenticeships in a wide range of disciplines, reflecting our commitment to establish a diverse and sustainable workforce across our locations.
Mentorship & coaching programme	Our mentorship programme matches individuals with a mentor whose skillset and experience is relevant and specific to their own developmental aspirations. We also run training webinars to assist managers to develop their own coaching and feedback skills.
Key skills development opportunities	We have a dedicated catalogue of resources to facilitate the provision of key skills training to all employees across the business, available to all on our live intranet site.

Sustainability report continued

> **"**
>
> The improvements made in this area during FY21 reflect the extensive work we have done to support our people during a period of significant change.

Cultural positivity continued

Diversity & Inclusion

We seek to employ a workforce that reflects the diversity of our customers and the communities we engage with. We also seek to create an environment in which every member of our workforce helps to foster a culture of equality, diversity and inclusion. As set out in our equal opportunities policy we are committed to ensuring that all of our workplaces are free from discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation.

In the prior year, we committed to take decisive action to better understand this challenge within our business. The initial stage of this work was to form our Global Diversity & Inclusion Working Group, composed of representatives from all of our locations globally, with executive sponsorship from the Chief Executive Officer. By creating a diverse taskforce from within the business to gain greater insight and a platform for collective action, we hope that our work to drive improvements in this area will be more effective at embedding a truly inclusive culture across Wilmington. Further information on diversity is discussed in the corporate governance report on page 42.

The activities of the Working Group in year one began with a comprehensive training programme attended by all members, followed by a series of scoping exercises to understand issues specific to each of our portfolio businesses that have gone on to inform local action plans for driving change. Our next phase of progress will be co-ordinated by our newly appointed Head of Diversity & Inclusion, who will work with the Diversity & Inclusion Working Group to ensure that the business level action plans are effectively supported by a cohesive group-level strategy. This group strategy will include the identification of specific objectives that can help us to monitor the progress of the bespoke initiatives in a way that drives sustainable positive change.

Driving progress

As we continue to develop robust and consistent mechanisms for monitoring our progress in this area, we have used our employee engagement survey results to provide an initial baseline to measure future improvements across the three areas of focus.

Statement of cultural ambition	Area of focus	FY21 score	FY20 score
People from all backgrounds are treated fairly at Wilmington	Diversity & Inclusion	**8.4**	8.1
My manager or a mentor encourages and supports my development	Training & Development	**7.7**	7.4
Wilmington really cares about my mental wellbeing	Health & Wellbeing	**7.8**	6.3

The improvements made across all three areas during FY21 reflect the extensive work we have done to support our people during a period of significant change. We are committed to maintaining or improving our score against these cultural ambitions in FY22. We have also set an objective to build a comprehensive database around our cultural ambitions to facilitate insightful objective setting and measurement of our progress.

Our work in this area contributes to: **SDG 3** Good health and wellbeing, **SDG 5** Gender equality, **SDG 8** Decent work and economic growth; with a focus on the below sub-indicators:

3 GOOD HEALTH AND WELL-BEING	**3.4**	By 2030, reduce by one-third premature mortality from non-communicable diseases through prevention and treatment and promote mental health and wellbeing
5 GENDER EQUALITY	**5.5**	Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life
8 DECENT WORK AND ECONOMIC GROWTH	**8.5**	By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value

Sustainability report continued

Customer *empowerment*

We are committed to embedding a customer-led approach to product development and delivery. We want our customers to directly inform our agenda, and by creating accessible, high value, and up to date products we empower them to realise maximum value from our offering. Critical to the success of this ambition is a culture in which any individual involved in the product cycle is mindful of customer needs, such that they reflect those needs throughout the cycle from development to delivery.

> "
> During FY21 we maintained the flexibility to align our products and their delivery format to ever changing customer need as they adapted to ongoing restrictions and challenges within their own businesses.

We approach this challenge from a range of perspectives, as set out below.

Perspective	Principal objectives	Supporting resources and initiatives
Accessibility	Produce products that are accessible to all, with a consistent approach to each core product group.	• Accessibility policy informing product accessibility standards • Training to ensure strong understanding and high levels of awareness of accessibility issues • Product-specific roadmaps to improve accessibility standards
Innovation, flexibility and agility	Embed a dynamic product management approach that can respond rapidly to change whilst maintaining high quality outputs.	• Investment in strong digital capabilities to ensure sufficient flexibility to be delivery mechanic agnostic • Embedding strong data analytic capabilities across the portfolio to provide high quality insight to customers • Training through the Wilmington product academy • Adhering to a philosophy of iterative product roll-outs to produce relevant updates and stay close to change
Customer engagement	Ensure customers directly inform the new product development agenda, and facilitate strong communication channels for customer feedback.	• CAGs • Customer feedback questionnaires • Targeted peer group and wider industry analysis • Dedicated communication channels to allow customers to contact the business and receive individual responses

Driving progress

During FY21 we maintained the flexibility to align our products and their delivery format to ever changing customer need as they adapted to ongoing restrictions and challenges within their own businesses. As we continue to seek high levels of engagement, and remain responsive to our customers' needs, our ambitions for new product development reflect the following commitments:

• 100% of new products can be accessed via hybrid delivery formats.

• 100% new product development proposals demonstrate a minimum level of customer referencing for presentation to the investment committee before approval is granted.

• Effective product roll-out is verified by net promoter score targets, in addition to financial returns.

Our future focus is to further develop the work we do to instil a truly customer-led product management culture. Championing accessibility is central to this ambition and therefore we are committed to ensuring that every individual involved in the product cycle has been given the resources they need to integrate accessibility considerations into their plans. In FY22 we aim to deliver:

• A senior leadership workshop to ensure a coherent and consistent understanding of up-to-date accessibility requirements across the Group, so that this knowledge can be integrated into product management and long term business planning processes.

• A bespoke webinar available to all staff to improve awareness and understanding of accessibility issues.

• Revised accessibility policy terms across all our businesses.

• A roadmap to set out the actions required to conform to WCAG Level AA standards across our digital portfolio.

Our work in this area contributes to: **SDG 10** Reduced inequalities; with focus on sub-indicator **10.2**:

10 REDUCED INEQUALITIES	**10.2** By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.

Sustainability report continued

Proactive *assurance*

Ethical compliance

Responsible business practice is at the heart of our strategy, and therefore we aim to instil a culture of strong ethical compliance across the portfolio. Our ethics policies are designed to provide clear and consistent guidance to our people to ensure they contribute to these high standards of ethical conduct, and are outlined for all employees in our Staff Handbook.

One of the key elements of our core value of cultural positivity is that Wilmington reflects a safe and inclusive working environment that encourages strong employee engagement and participation by all. Management encourages this by advocating universal openness and transparency in respect of reporting non-compliance of any form, with clear guidelines provided in the Group's ABC and Whistleblowing policies. As we advocate high standards of integrity internally, we echo this sentiment in respect of our external stakeholders by taking a zero-tolerance approach to any forms of unethical behaviour within our wider operations and supply chains.

Responsible digitisation

The acceleration of our digitisation strategy in the prior year was critical to the ability of the Group to continue to adapt in the face of uncertainty. As we have continued to refine our digital-first model and commit to enhancing digital capabilities, we have focussed on a parallel commitment of responsible digitisation. Our customers rely heavily on quality data and advanced analytics in our information and data businesses, and on reliable and engaging delivery formats in our training and education businesses. This reliance comes with positive assurance from our teams that we take a proactive approach to uphold the highest standards of cyber security and data privacy.

Our digital assurance process is governed by skilled individuals who maintain high levels of control and compliance in this area and implement best practice across three key integrated workstreams.

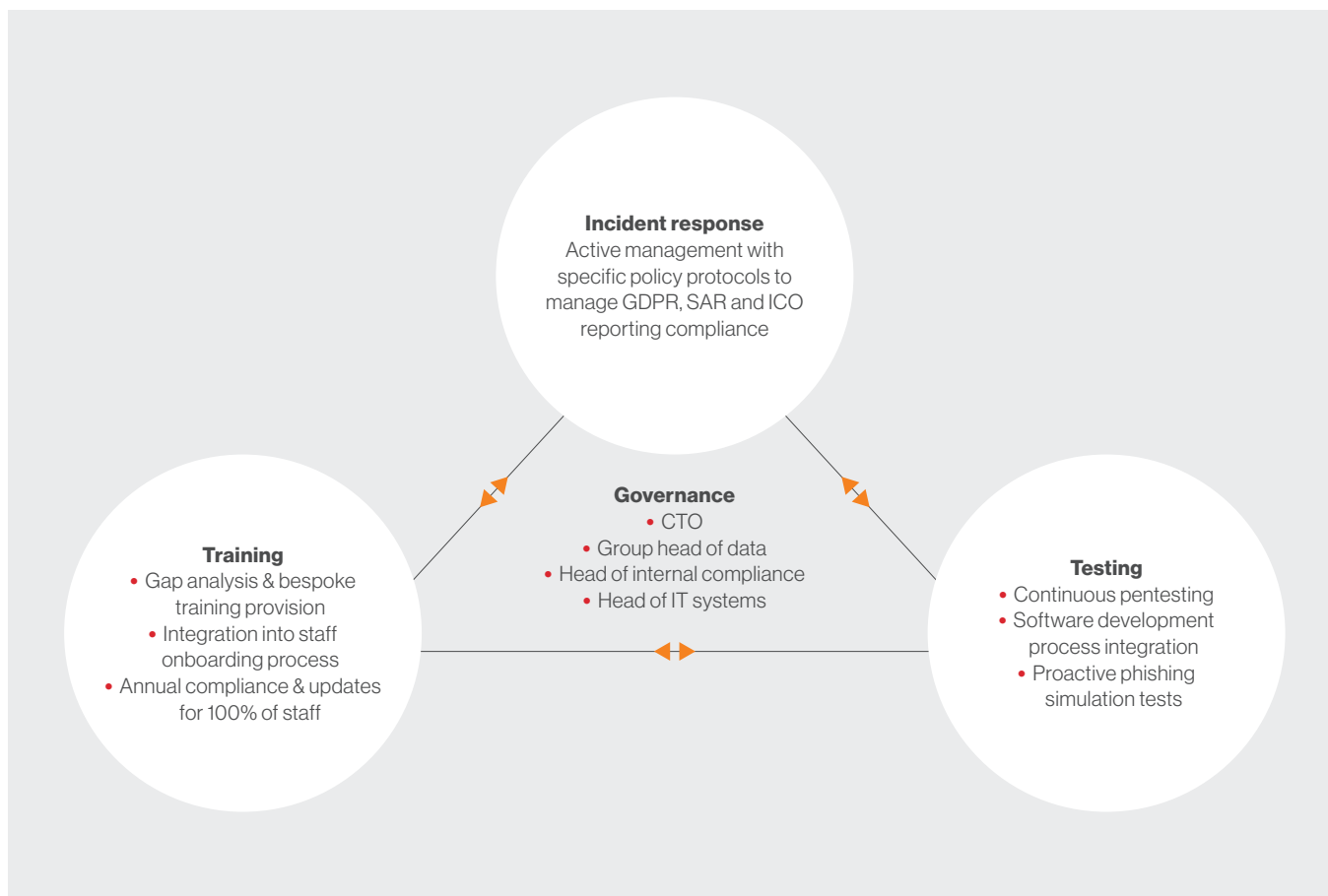We use three key targets to hold ourselves accountable to high standards of compliance in this area:

- **>98%** acceptance of cyber security policy*

- **0** phishing incidents resulting in the loss of data

- **100%** of internal products undergo continuous pentesting

* Policy acceptance data includes absent employees, therefore 98% effectively equates to 100% of the present workforce

From FY22 we intend to introduce an additional target to demonstrate action in this area, that 100% of external digital products will undergo continuous pentesting.

Our work in this area contributes to **SDG 16 Peace, justice and strong institutions**, with focus on sub-indicator **16.6**:

16 PEACE, JUSTICE AND STRONG INSTITUTIONS	**16.6** Develop effective, accountable and transparent institutions at all levels.

Incident response
Active management with specific policy protocols to manage GDPR, SAR and ICO reporting compliance

Governance
- CTO
- Group head of data
- Head of internal compliance
- Head of IT systems

Training
- Gap analysis & bespoke training provision
- Integration into staff onboarding process
- Annual compliance & updates for 100% of staff

Testing
- Continuous pentesting
- Software development process integration
- Proactive phishing simulation tests

Sustainability report continued

Environmental *responsibility*

We recognise the need to commit to environmentally responsible operations as part of our commitment to creating a healthy planet for our people, our partners and our local communities to prosper. Our biggest direct impacts on the planet come from resource use and emissions from our offices, and we continue to focus on transitioning to sustainable materials and methodologies to reduce this impact.

In recognition of the gathering pace of climate change, we also recognise the need to accelerate any action that we can take to ensure that our business plays an active role in the global effort to address the crisis. We have therefore committed to becoming carbon neutral in FY22, and will also set a roadmap to become a net zero carbon business, to maximise our impact and demonstrate our support of collective action.

> "
> We have early adopted TCFD and have accelerated our work to address climate change.

Responsible resource use and effective working practice

Ongoing investment in our technological and data capabilities has had a significant impact on our ability to work in innovative ways resulting in reduced environmental impact. The capabilities we now have to operate remotely whilst maintaining strong personal connections and high product quality have significantly reduced the environmental footprint from travel by our workforce and our customers. Whilst this progress is positive, we also recognise the need to address the impact of our digital footprint on the environment through energy consumption.

The significant shift to remote and blended working triggered by the Covid-19 pandemic provided us with an opportunity to reduce our environmental impact. This new way of working has been effective, and positive feedback from our people prompted us to consolidate our office space to reflect a future of flexible working arrangements. This reduction in the need for office presence will lead to more efficient use of remaining space, with related resource use reduction onsite and emissions from commuting. Where the consolidation of office space resulted in surplus furniture, fixtures and IT equipment, we worked with a specialist partner to recycle it and prevent any waste going to landfill in line with our resource management policy.

Resource management policy

Resource use	Resource disposal
Paper **Source:** a chain of custody certified suppliers to ensure only sustainable raw materials are used in production. **Production:** at mills with ISO 14001 accreditation and Environmental Management System ('EMS') registration.	**100%** IT waste managed by ISO 9001:2015 and ISO 14001:2015 accredited, WEEE-compliant recycling partner.
Printers **Supplier standards:** major print suppliers are ISO 14001 certified or work to this as minimum. The Forest Stewardship Council is recommended for the Endorsement of Forest Certification. All our printers work digitally facilitating reduced transport, courier and energy utilising activities.	**100%** redundant PPE recycled or repurposed. **100%** office sites provide recycling units for waste, with supporting guidelines to promote workforce compliance.
Packaging Recyclable polythene with a thickness of 25 microns, or exo-biodegradable and potato starch forms of polythene.	

Energy and carbon reporting

Our reporting on energy use and GHG emissions is in line with the Streamlined Energy and Carbon Reporting ('SECR') legislation. To reflect our commitment to monitor, report and reduce our environmental impact, we have also increased the scope of our GHG reporting to include Scope 1, 2 & 3 emissions.

Energy use and GHG emissions have been assessed following the ISO 14064-1:2018 standard and using the 2021 emission conversion factors published by Department for Environment, Food and Rural Affairs ('Defra') and the Department for Business, Energy Industrial Strategy ('BEIS'). The assessment follows the location-based approach for assessing Scope 2 emissions from electricity usage. The operational control approach has been used. All Group entities have been included in the assessment.

Global carbon footprint assessment	30 June 2021 (Tonnes of CO$_2$e)	30 June 2020 (Tonnes of CO$_2$e)	Improvement in the year
Emissions from:			
Scope 1 – Direct emissions	32	69	54%
Scope 2 – Indirect emissions	164	240	32%
Total scope 1 & 2 emissions	**196**	309	37%
CO$_2$ ratio scope 1 & 2 (tonnes of CO$_2$ per employee)	0.24	0.36	33%
Scope 3 – other indirect emissions	235	n/a	—
Total (all scopes 1, 2 & 3)	**431**	n/a	—
Total global energy consumption (kWh)	**794,955**	1,277,141	38%

The action we have taken in the year to consolidate our office space reflects our intention to continue to reduce our resource use and carbon footprint from offices in the future. We are also assessing our process for managing resource use and emissions from all aspects of our operations, and the conclusions from this work will form the basis for our roadmap to becoming a net zero carbon business. Our aim to further reduce our carbon emissions in FY22 will be initially supported by work to significantly increase the percentage of renewable energy usage across the portfolio. We will also look to further understand our scope 3 emissions, and take steps to reduce these where practicable.

Sustainability report continued

Environmental responsibility continued

Our work in this area contributes to **SDG 12** Responsible consumption and production, and **SDG 13** Climate action; specifically:

	12.2	By 2030, achieve the sustainable management and efficient use of natural resources
	12.5	By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.
	13	The implementation of our net zero carbon roadmap will contribute to SDG 13.

> "
> We have committed to carbon neutrality in FY22 and we are working to refine our roadmap to becoming a net zero carbon business.

Taskforce for Climate Related Financial Disclosures

During FY22 we will complete our work to align fully with TCFD requirements, including performing scenario analysis to quantify our climate risks and opportunities. For the year ended 30 June 2021, our alignment with TCFD is summarised below.

Requirement		Progress
1.1	Describe the Board's oversight of climate-related risks and opportunities.	Board level oversight is with the Chief Financial Officer and the Senior Non-Executive Director. See page 21 of the sustainability report.
1.2	Describe management's role in assessing and managing climate-related risks and opportunities.	Management is with the Group Finance and Sustainability Director, reporting to the Chief Financial Officer and working in collaboration with portfolio business and shared service function management.
2.1	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	
2.2	Describe the impact of climate related risks and opportunities on the organisation's businesses, strategy, and financial planning.	Consideration of the risks and opportunities that may arise as a result of climate change has been integrated into the Group's risk management framework, as detailed in the annual risk review on page 31. This process considers short, medium and long term outcomes, and is heavily integrated into the Group's broader strategic and financial planning process. Detailed scenario planning to further inform the risk assessment process will be performed in FY22 in preparation for full compliance with TCFD.
2.3	Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	
3.1	Describe the organisation's processes for identifying and assessing climate-related risks.	
3.2	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.	
4.1	Disclose the metrics used by the organisation to assess climate related risks and opportunities in line with its strategy and risk management process.	The metrics used are aligned to the financial and non-financial indicators used in the Group's wider risk assessment process. Further analysis of the most appropriate metrics will be performed as part of the scenario analysis planned in FY22.
4.2	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas ('GHG') emissions, and the related risks.	We report comprehensively on Scope 1, 2 and 3 GHG emissions in line with SECR guidelines. See page 26 of the sustainability report.
4.3	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	Details of the Group's targets to drive progress are included on page 25 of the sustainability report.