

**"Sustainability is here to stay, or we may not be."**  
— Niall FitzGerald

# **CORPORATE SOCIAL RESPONSIBILITY**

## **Report 2025**



BRAYTON GLOBAL

[www.braytonglobal.com](http://www.braytonglobal.com)





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## About Brayton Global

Brayton Global is a fast-growing provider of IT and staffing solutions, specialising in on-demand expertise and consultancy for digital transformation. The company's core values include innovation, diversity, and sustainability, which drive its approach to meeting client needs. Brayton offers On-Demand Services (flexible staff augmentation for IT projects), Managed Services (outsourced solutions), and Advisory Services (strategic IT consulting), covering domains from cloud computing and data analytics to cybersecurity and AI.

This diversified service model allows Brayton to support European Union institutions and private tech sector clients with agility and specialized talent.

Brayton's client base – primarily EU agencies and technology firms – imposes high expectations on performance, compliance, and ethical conduct. EU institutional clients, in particular, emphasise quality management, transparency, and adherence to EU regulations in areas like data protection and fair labor. Brayton's achieved it's ISO 9001 certification for Quality Management Systems in 2024 and underscores our commitment to rigorous process excellence and client satisfaction.

At the same time, Brayton's stakeholders (employees, clients, partners, and regulators) expect the company to uphold strong values: employees seek an inclusive, safe, and empowering workplace; clients demand reliable delivery and data security; partners and regulators expect integrity and compliance in all operations. These expectations align with Brayton's values and provide a foundation for identifying relevant CSR (Corporate Social Responsibility) and ESG (Environmental, Social, Governance) themes.

Brayton's rapid growth (30% annually since 2017) and expanding footprint (220+ team members and operations across 18 countries) mean its stakeholder landscape is broad. The company has placed over 800 experts in EU institutions in the past six years, making EU public sector ethics and diversity requirements integral to its business model. Effective communication, service orientation, and priority management have been key to Brayton's success in the EU market.

Looking ahead, Brayton's CSR strategy must reinforce these strengths while addressing emerging stakeholder priorities in sustainability and governance. Aligning with international CSR standards – such as ISO 26000 guidance on social responsibility and the Global Reporting Initiative (GRI) – will help ensure Brayton meets stakeholder expectations in a structured, credible way. Brayton's focus areas map closely to these, reflecting a holistic approach to its social and environmental responsibilities.)

## Purpose of our CSR Report

This report presents our sustainability performance for the 2024-25 financial year and has been prepared in accordance with the GRI Standards which ensures we present our performance against globally accepted sustainability reporting principles and measures.

The content of this report is directed by a materiality process, which identifies the most significant and important issues for Brayton to work towards and report on, as perceived by our stakeholders and staff.

Several recent trends and shifts inform Brayton Global's CSR and ESG strategy. ESG awareness and regulations are on the rise across Europe, which influences both client requirements and corporate best practices. Over the past few years, there has been a surge in focus on environmental and equity issues, accelerated by global events – for example, the COVID-19 pandemic highlighted employee health & wellness and how quickly ESG risks can translate into financial and operational impacts. In the professional services sector, ESG has become a key focus, driven by greater awareness of climate change, social justice, and the need for resilient governance. Investors and public-sector clients alike are increasingly scrutinizing companies on these factors, meaning Brayton must proactively manage ESG aspects to maintain trust and competitiveness.

Regulatory developments are also shaping our CSR priorities. The EU's Whistleblower Protection Directive (transposed into national laws) required companies like Brayton to establish secure channels for reporting misconduct. Brayton responded by updating its



Whistleblower Policy in early 2025, providing internal and third-party reporters a safe means to report breaches of EU law without fear of retaliation. This strengthens Brayton's culture of transparency and accountability, aligning with stakeholder expectations for ethical behavior.

Additionally, upcoming EU sustainability reporting requirements (such as the Corporate Sustainability Reporting Directive, CSRD) signal that Brayton should prepare for more rigorous ESG disclosures by the mid-2020s. Even if Brayton is not yet obligated under CSRD due to its size, the trend toward mandatory ESG disclosure and external assurance is clear, and forward-looking firms are beginning to align their reporting practices accordingly.

Market dynamics in the technology and talent sector further influence Brayton's CSR focus. The digital industry is facing a tech talent shortage, and competition for skilled professionals is intense. A 2023 study found that over the next three years about 40% of the average workforce will require reskilling, due to rapid integration of AI and automation into operations. For Brayton, this means investing in employee development and continuous learning is not just a social responsibility but an operational necessity to remain competitive. The company's ability to attract, develop, and retain talent (especially with digital skills) will be critical. This imperative dovetails with employee expectations for career growth and development opportunities as part of CSR.

Moreover, remote and hybrid work models – a lasting outcome of the pandemic – have changed workplace dynamics. Employees now place greater emphasis on well-being, work-life balance, and mental health support. Brayton's CSR strategy must adapt to ensure workplace well-being (including mental health resources and flexible work arrangements) is addressed as part of its social responsibility. This will aid in retention and productivity, aligning with the "Workplace Safety & Well-Being" priority.

In Brayton's client environment, data privacy and cybersecurity have become front-and-center concerns. With increasing cyber threats, clients (especially in government) demand strict data protection measures from their service providers. Cybersecurity is now recognised as a significant ESG factor – accounting for over 25% of some ESG ratings in tech industries – because robust cyber and privacy practices are essential to building stakeholder trust. Brayton's expansion into new markets (Italy, United Kingdom, France, and the Netherlands) also broadens its exposure to data protection laws (e.g. GDPR) and cyber risks. These shifts mean Brayton's CSR strategy should prominently feature data privacy and cybersecurity commitments, framing them as part of its duty to clients and society (not merely IT concerns).

Finally, environmental sustainability, while not previously a core focus (given Brayton's service-oriented, low-industrial nature), is emerging in importance. Clients and partners increasingly value environmental responsibility in their supply chain. For example, EU institutions often incorporate green procurement criteria, expecting vendors to have environmental policies or ISO 14001 certification. Brayton's plan to align with ISO 14001 for Environmental Management reflects this shift, as the company seeks to systematically manage its environmental impact (e.g. carbon footprint from business travel, energy use in offices, e-waste management). Climate-related considerations are becoming more material even for IT service firms – rising energy usage from data and cloud services contributes to climate transition risk, which stakeholders are increasingly concerned about. Proactively addressing environmental impact (through energy efficiency, offsets, or green initiatives) will strengthen Brayton's reputation and prepare it for future regulatory or client demands in sustainability.

In summary, these market and operational shifts – from heightened ESG expectations and regulations to talent challenges, new working models, cybersecurity threats, and environmental awareness – all inform Brayton Global's CSR strategy. The strategy must be adaptive and stakeholder-centric, ensuring Brayton continues to meet evolving expectations and mitigate ESG risks while leveraging opportunities (such as a strong employer brand through CSR). This context sets the stage for identifying Brayton's material ESG topics and shaping initiatives for the next five years.

## A message from the founders

As we reflect on another pivotal year for Brayton Global, we're reminded that sustainable growth is only meaningful when anchored in purpose and integrity. Since our founding, we have been guided by a simple ambition: to deliver value through trust, innovation, and responsibility. This report marks a milestone in that journey—not only because it deepens our transparency, but because it captures our evolving commitment to corporate social responsibility (CSR) as a strategic foundation for our work.

2024–25 was a year of transformation and momentum. We surpassed 240 employees, expanded into new markets, and enhanced the quality of our operations through ISO 9001 certification. Achieving this standard reflects our maturing business processes, but more importantly, it affirms our belief in doing things the right way—from how we deliver services to how we treat people and protect data.

Our CSR agenda matured in lockstep with this growth. We launched our 5x5 Sustainability Roadmap, a bold five-year plan that embeds ESG into every corner of the business—from inclusive recruitment and ethical partnerships, to climate-conscious operations and AI governance. This roadmap isn't just a strategy—it's a commitment to deliver with purpose, to hold ourselves accountable, and to ensure that every stakeholder interaction reflects our values.

We are particularly proud of how our materiality analysis, shaped by over 40 stakeholders, now drives our CSR strategy. It ensures that we focus on what matters most—transparency, diversity, well-being, environmental impact, and data responsibility. And we don't just report on these topics—we act on them. For example, our responsible procurement now includes mandatory ESG criteria for all new suppliers. Our AI principles prioritise fairness and explainability. Our workplace wellness programme is not a brochure; it's part of how we manage projects, support people, and ensure long-term service quality.

Joining the UN Global Compact this year and aligning with its Ten Principles reflects our commitment to human rights, labour standards, environmental stewardship, and anti-corruption—globally recognised foundations of responsible business. Looking ahead, we also plan to adopt ISO 14001 and ISO 27001, reinforcing our long-term focus on sustainability and digital trust.

It is no longer enough to be technically competent—we must also be ethically grounded and socially aware. CSR at Brayton Global is not a side programme; it is core to how we operate, how we compete, and how we grow.

**To our employees:** thank you for making these values real.

**To our clients:** thank you for holding us to high standards.

**To our partners and communities:** we are proud to work alongside you.

We remain committed to building a company that does more than deliver IT services—it delivers lasting, positive impact.

**Frederic De Boom & Antonela Santilli**

Founders & Owners



# Emerging market and operational shifts influencing CSR strategy

Several recent trends and shifts inform Brayton Global's CSR and ESG strategy. ESG awareness and regulations are on the rise across Europe, which influences both client requirements and corporate best practices. Over the past few years, there has been a surge in focus on environmental and equity issues, accelerated by global events – for example, the COVID-19 pandemic highlighted employee health & wellness and how quickly ESG risks can translate into financial and operational impacts. In the professional services sector, ESG has become a key focus, driven by greater awareness of climate change, social justice, and the need for resilient governance. Investors and public-sector clients alike are increasingly scrutinizing companies on these factors, meaning Brayton must proactively manage ESG aspects to maintain trust and competitiveness.

Regulatory developments are also shaping our CSR priorities. The EU's Whistleblower Protection Directive (transposed into national laws) required companies like Brayton to establish secure channels for reporting misconduct. Brayton responded by updating its Whistleblower Policy in early 2025, providing internal and third-party reporters a safe means to report breaches of EU law without fear of retaliation. This strengthens Brayton's culture of transparency and accountability, aligning with stakeholder expectations for ethical behavior. Additionally, upcoming EU sustainability reporting requirements (such as the Corporate Sustainability Reporting Directive, CSRD) signal that Brayton should prepare for more rigorous ESG disclosures by the mid-2020s. Even if Brayton is not yet obligated under CSRD due to its size, the trend toward mandatory ESG disclosure and external assurance is clear, and forward-looking firms are beginning to align their reporting practices accordingly.

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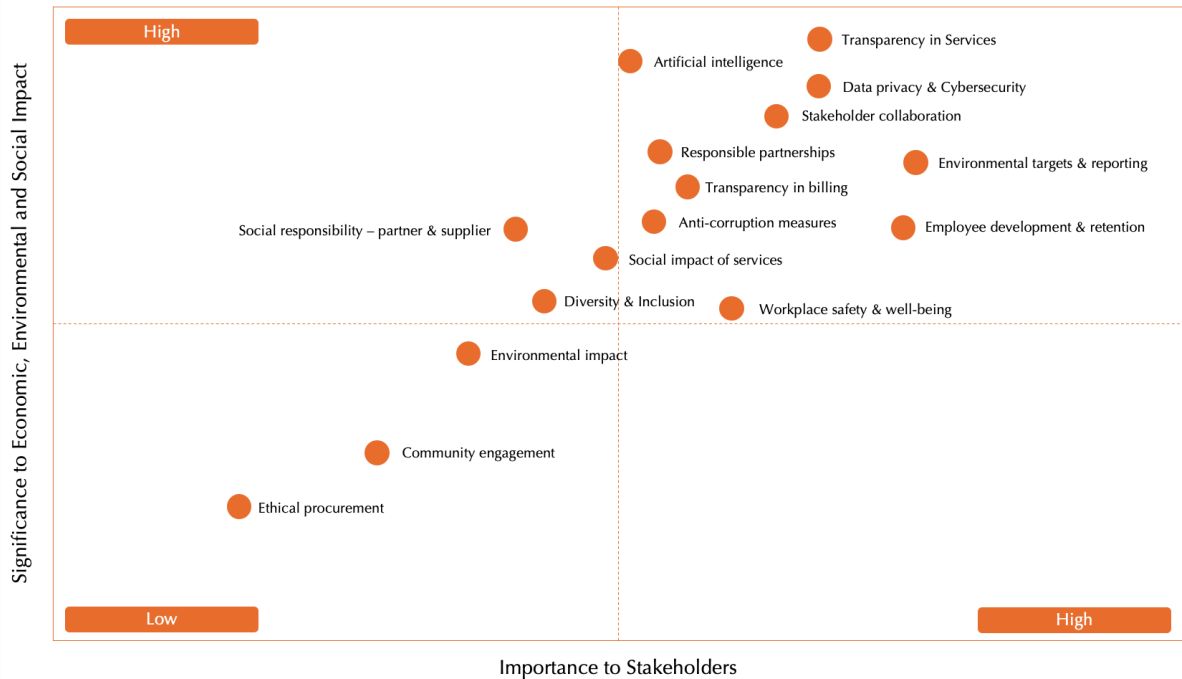
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## Material ESG Topics for Brayton Global

Based on the business model, stakeholder inputs, and sector trends, Brayton Global will prioritise a set of material ESG topics that reflect its most significant impacts and stakeholder interests. These topics connect to the company's operational realities (IT services and staffing) and its values. According to industry analyses, social factors such as privacy protection and employment practices are especially material in the tech and IT services industry, while climate and environmental risks are rising in significance (). Professional service firms like Brayton also face material issues in diversity & inclusion, employee engagement and retention, workplace health & wellness, and strong ethical governance (anti-corruption).

Brayton Global conducted a CSR survey with over 40 key stakeholders (customers, suppliers and internal employees) to identify material topics relevant to our operations and market sector. This process involved collecting and analysing stakeholder feedback to determine the social, environmental, and governance issues that most impact our business and are of greatest concern to our stakeholders. Understanding these priorities is essential for aligning our CSR strategy with stakeholder expectations, ensuring relevance, and strengthening our long-term sustainability and market credibility. The following graphic shows these high-level Materiality Matrix results from the survey that are covered in great detail in subsequent sections of this report:



Drawing on Brayton's stakeholder expectations and international CSR frameworks (ISO 26000, GRI Standards), the following ESG topics emerge as most material:

- 1. Transparency in Services:** The top-rated priority in 2025, transparency reflects growing



client and regulator demands for clarity in what services are provided, how outcomes are measured, and how AI and automation are deployed. This includes setting clear service expectations, publishing performance indicators, and offering transparent terms. It aligns with ISO 26000's "fair operating practices" and is critical to maintaining stakeholder trust in digital environments.

2. **Employee Development & Retention:** As a staffing and IT services firm, Brayton's people are its greatest asset. Providing continuous learning, career development, and maintaining high retention rates are material to sustaining business growth. Why material: In a competitive tech talent market, companies that invest in their employees' growth gain a performance edge. With rapid technological change, Brayton needs to upskill staff regularly – a point highlighted by studies showing nearly half of tech workers need reskilling in coming years. High retention also preserves institutional knowledge and client relationships. This topic is material from both an internal perspective (employee satisfaction) and external perspective (client confidence in stable teams). It overlaps with D&I (e.g. ensuring all employees have development opportunities) and aligns with the "empowered people" theme noted in professional services ESG contexts.
3. **Workplace Safety & Well-Being:** This encompasses occupational health and safety (OH&S) and the broader well-being of employees (physical and mental health). Even as a consulting and office-based company, Brayton must ensure a safe work environment (ergonomic workplaces, incident prevention) and support employee wellness (e.g. mental health resources, work-life balance initiatives). Why material: Employee well-being has a direct impact on productivity, retention, and service quality. The COVID-19 period underscored that health and wellness can rapidly become critical issues. Stakeholders (employees and their families, regulators, clients who entrust Brayton with critical projects) expect Brayton to actively promote a healthy workforce. This ties to ISO 45001 (Occupational H&S, which Brayton could adopt) and ISO 26000's labor practices.
4. **Environmental targets and reporting:** Listed among Brayton's current high-priority impact areas, environmental responsibility is of huge relevance, especially as Brayton plans alignment with ISO 14001. Managing our environmental footprint – energy use, carbon emissions (primarily from office operations and business travel), and waste (like electronic waste) – is part of being a forward-looking organisation. Why material: Stakeholders (especially European clients and younger employees) expect even service companies to contribute to climate solutions. As noted by S&P's sector analysis, climate transition risk (e.g. rising energy usage from digital services) is increasingly material to stakeholders in the tech services sector (). By focusing on energy efficiency, green office initiatives, and possibly offsetting travel emissions, Brayton can demonstrate environmental stewardship. This will also prepare the company for any future reporting obligations (under GRI or EU taxonomy) regarding emissions. Environmental management aligns with ISO 14001 standards and the "environment" core subject of ISO 26000.
5. **Supplier & Partner Social Responsibility:** Brayton extends ESG requirements to consultants, subcontractors, and service vendors. Key actions include due diligence on labour practices, data security, and compliance. This topic reflects rising stakeholder pressure to ensure value chain accountability, in line with ISO 26000 (fair operating practices) and GRI 414.
6. **Responsible Partnerships (Supply Chain and Community):** Brayton's relationships with its partners, suppliers, and the broader community form another material area. This involves ensuring that suppliers and subcontractors (such as independent consultants, recruitment partners, software vendors) adhere to ethical, labor, and environmental standards – effectively extending Brayton's values across its value chain. It also includes how Brayton contributes to the community (through, for example, partnerships with educational institutions, tech communities, or social initiatives). Why material: As Brayton grows, its social license to operate partly depends on how it manages its wider impacts. EU clients increasingly value suppliers who enforce ESG criteria in their supply chains and who engage positively with society. Responsible partnerships mean selecting partners who share Brayton's stance on diversity, data security, and anti-corruption, thereby reducing risk and enhancing brand trust. This topic falls under ISO 26000's fair operating practices and community involvement. It's material because missteps by partners (e.g. a subcontractor violating labor laws or having a security

breach) can directly affect Brayton's reputation and operational continuity.

7. **Data Privacy & Cybersecurity:** Protecting client and employee data and ensuring robust cyber defenses is a critical ESG issue for Brayton. The company handles sensitive data through its IT projects and must comply with privacy laws (GDPR) and client security requirements. Privacy protection is considered the most material social factor in software/IT services, from both stakeholder and business perspectives. The increasing sophistication of cyber threats means this risk is growing. Any data breach or cyber incident could severely damage Brayton's reputation and client trust. Stakeholders (clients, regulators, end-users) demand strict data privacy, making this a top priority. In ESG terms, this falls under customer privacy (GRI 418) and information security. Notably, cybersecurity is now recognised as a key component of governance and social responsibility, contributing significantly to ESG evaluations. Brayton must treat data security not just as IT issue, but as a core part of its responsible business conduct.
8. **Stakeholder Collaboration:** This includes involving clients, employees, and society in shaping services. Co-design, regular feedback loops, and inclusive governance structures reinforce Brayton's responsiveness and value creation.
9. **Artificial Intelligence:** AI governance emerged strongly. Stakeholders demand explainability, fairness, and accountability in AI-powered services. Brayton has adopted responsible AI principles to guide deployment across client-facing and internal platforms. This intersects with both digital ethics and employee reskilling imperatives. All employees will be trained on ethical AI by the end of 2026.
10. **Transparency in Fees & Billing Practices:** Stakeholders highlighted the importance of financial transparency, especially in public sector contracts. This includes clear invoicing, predictable pricing, and responsible commercial conduct – all falling under ISO 26000's fair operating principles.
11. **Anti-Corruption and Ethical Governance:** Operating with integrity and zero tolerance for corruption is non-negotiable, especially given Brayton's work with public institutions. Public sector clients require strict adherence to anti-bribery rules and ethical procurement practices. Any incident of corruption or fraud could bar Brayton from future contracts and harm its credibility. Thus, robust anti-corruption measures (code of ethics, employee training, whistleblower protection, due diligence on partners) are material. Governance issues like policies on bribery and corruption are key ESG concerns for professional firms, as they reflect corporate ethics and accountability. This topic aligns with ISO 26000's "fair operating practices" and international norms (e.g. UN Global Compact Principle 10 on anti-corruption). Stakeholders such as clients, regulators, and investors will closely watch Brayton's performance on ethics and compliance.
12. **Social Impact of Service Delivery:** Stakeholders are increasingly interested in how Brayton's solutions contribute to broader social goals, such as digital inclusion or public sector efficiency. While not a top priority, this supports EU policy alignment and Brayton's purpose-driven positioning.
13. **Diversity & Inclusion (D&I):** Embracing diversity within Brayton's workforce and ensuring an inclusive culture is crucial. This reflects both a social value and a business need, as diverse teams drive creativity and better decision-making. It is also a priority for EU clients who value equality. Material issues under D&I include gender balance in leadership, multicultural representation, and equal opportunity. Why material: The tech sector has historically low diversity in some areas, and stakeholders expect improvement. Inclusive hiring and promotion practices lead to higher employee engagement and retention, directly affecting Brayton's ability to deliver quality service. Aligned with ISO 26000's human rights and labor practices, D&I is about non-discrimination and equal opportunity. Stakeholders (employees, clients, society) view this as a marker of Brayton's social responsibility.
14. **Environmental Impact of Travel & Events:** As a subtopic of environmental management, Stakeholders called for emissions reductions from non-essential travel and greener event participation. Brayton is piloting carbon offsetting and increasing virtual engagement.
15. **Community Engagement:** Community initiatives are seen as a lower priority, but Brayton continues to support grassroots tech education and skills development. This



supports long-term talent pipelines and builds goodwill in local ecosystems.

**16. Ethical Procurement:** Now integrated into broader supplier responsibility. Brayton enforces ESG clauses in supplier contracts and uses sustainability assessments as part of pre-selection.

Each of these topics is intertwined with stakeholder interests and international standards.

## Metrics and Reporting Considerations

To effectively manage and communicate progress on the material topics, Brayton Global will establish clear metrics (KPIs) and a robust reporting system. The selection of metrics will be guided by international standards for consistency and credibility. The GRI Standards enable organisations to report on their economic, environmental, and social impacts in a comparable and credible way. In addition, Brayton will use industry benchmarks and any client-specific reporting requirements (some EU institutions may request ESG data from contractors as part of contract management).

Our key considerations for metrics and internal tracking:

- **Relevance and Clarity:** Each chosen metric directly reflects an aspect of the ESG topic that Brayton can influence. For example, we will track gender diversity by the percentage of women at different levels, to act as a clear indicator of inclusion efforts. We will track employee turnover to indicate retention success. Data breach count (if any) is a straightforward measure of cybersecurity outcomes. We believe it important to define each metric precisely (e.g. what counts as a "data breach" in internal terms, how to calculate the injury rate, etc.) to ensure consistent tracking.
- **Alignment with Standards:** Brayton's metrics will, where possible, align with GRI disclosures or ISO management system measures. This alignment ensures that we are meeting international best practices and prepares Brayton for eventual external reporting. For example, we will use GRI 405-1 guidance on reporting diversity in the workforce (by gender, age, etc.), which Brayton will use to structure its D&I metrics. Using standard definitions (like those from GRI or ISO) for metrics will also facilitate benchmarking against our peers and responding to client questionnaires.
- **Measurability and Data Collection:** Brayton will assess how it will gather data for each metric. Some data are readily available (e.g. Our HR systems provides diversity and turnover data; training records can show training hours and completion rates for ethics or cybersecurity courses). Other data might require new processes – for instance, calculating carbon emissions requires tracking electricity use in our offices (that are lease managed so we rely on our landlord to provide these data) and business travel miles which are extracted from financial systems. We will establish data owners for each metric (e.g. HR for diversity and turnover, IT/security for cyber incidents, Compliance for anti-corruption training, Facilities for environmental data) will embed accountability. It's recommended to start with metrics that can be measured with reasonable effort and build capacity over time for more complex measures (like supply chain ESG assessments).
- **Targets and Benchmarks:** Along with tracking metrics, Brayton has set 5-year targets or objectives for each. For example, we have targets to "achieve at least 50% women in management by 2028" and "reduce our carbon emissions by 30% by 2027". These targets signal our ambition and allow stakeholders to gauge progress. We have set these targets and benchmarks to be realistic and reflect our business operations in the real world, yet they are challenging, and aligned with commitments that Brayton makes (for instance, Brayton will join the UN Global Compact, and have aligned our targets accordingly). In developing these targets, we consider industry benchmarks or stakeholder expectations – e.g. aim for injury rates that approach zero ("Target Zero" concept for safety), or a training hour target that exceeds industry average. Tracking against these targets annually will help internal management adjust actions as needed.
- **Qualitative Context:** While quantitative metrics are essential, Brayton's reporting also provide context. For example, if an increase in turnover is reported, the report will discuss any industry-wide talent shortages or internal changes that explain it. Similarly, the absence of any corruption incidents will be accompanied by an explanation of preventive systems in place. This helps our stakeholders understand not just the

numbers, but the management approach, which GRI also emphasises.

- **Internal Reporting Systems:** To support ongoing tracking, Brayton will use a CSR data dashboard and integrate ESG metrics into its existing performance management systems. Quarterly internal reports to leadership on key CSR KPIs ensure these topics get regular attention. Cross-functional CSR committees review this data and drive initiatives if metrics are off-track. For instance, if the data show a dip in employee engagement, that committee might sponsor a well-being program or focus group to address issues.

In summary, Brayton Global will establish a dashboard of ESG metrics aligned with international norms, set clear improvement targets, and build these into its management review cycle. Tracking metrics including diversity ratios, training hours, and cybersecurity preparedness will enable Brayton to set goals and demonstrate D&I and ESG successes to stakeholders, thereby strengthening engagement and outcomes. These metrics will form the backbone of Brayton's internal accountability and external transparency over the next five years.

## Our 5x5 Sustainability Roadmap (2025–2029)

In 2024-25, Brayton Global took the opportunity to launch a new 5-year sustainability program that encapsulates its CSR priorities. This new initiative will serve as a roadmap for ESG integration and culture-building, rallying employees and stakeholders around common goals. We developed the 5x5 Sustainability Roadmap to tackle five years of important CSR issues and multiple ESG pillars.



The purpose of this initiative is to embed sustainability into every facet of our operations and growth. It aims to replace our day-to-day business agenda and now reflects Brayton's maturity and stakeholder expectations. Specifically, the 5-year program will:

- Establish clear goals under each ESG pillar (People, Integrity, Environment, Partnerships) and drive company-wide efforts to achieve them by 2029.
- Foster a culture of accountability and innovation in CSR, encouraging employees at all levels to contribute ideas and participate in sustainability projects.
- Enhance Brayton's reputation as not only a fast and reliable IT partner, but also a responsibly-run, values-driven organization – thereby strengthening client trust and employer branding.
- Prepare Brayton for external validation of its ESG performance (e.g. readiness for ESG



ratings, compliance with future regulations, and the option of external assurance by 2026 as targeted).

**Thematic Pillars:** The Brayton 5x5 Sustainability Roadmap will be structured around several thematic pillars, each aligned to high-priority CSR areas identified. Each pillar has its own objectives and programs, but all contribute to the overarching purpose of sustainable and inclusive growth. The pillars and their focus areas are:

- 1. Inclusive Culture & Diversity:** This pillar focuses on people. Its goals include achieving greater representation of under-represented groups in the workforce and leadership, ensuring pay equity, and building an inclusive workplace where everyone feels valued. Key programs will involve enhanced recruitment outreach to diverse talent pools, mentorship and leadership development programs for women and minorities, and celebrating cultural diversity internally. By 2029, Brayton has set a goal to teach "50% of new hires from diverse backgrounds" and "50% women in tech roles." This pillar also encompasses employee engagement and growth: initiatives like a "Brayton Academy" for continuous learning would support retention and skill development, addressing the talent shortage challenge head-on. Success Indicator: Higher engagement scores and lower turnover, alongside meeting diversity targets.
- 2. Health, Safety & Well-Being:** This pillar underscores Brayton's commitment to its employees' physical and mental health. Under this theme, Brayton will introduce a "Zero Harm" program (continuing the spirit of safety from Target Zero) ensuring zero workplace accidents and promoting ergonomics in all offices. Additionally, a Well-Being Program will be launched, offering mental health days, counseling resources, and wellness activities (like fitness challenges or mindfulness sessions). Post-pandemic, supporting hybrid work flexibility is another aspect of well-being. A signature initiative here will be achieving ISO 45001 certification for occupational health & safety by 2029, and training 100% of staff in health and safety practices annually. Our success Indicator will maintain zero lost-time incidents, and improved self-reported well-being in staff surveys.
- 3. Digital Trust & Data Responsibility:** This pillar is about upholding trust in the digital realm. It combines data privacy, cybersecurity, and ethical use of technology. Goals include maintaining strong data protection (with no significant data breaches), complying with GDPR and beyond, and obtaining ISO 27001 (Information Security Management) by 2027 to formally assure clients of Brayton's controls. Brayton will form a Cybersecurity Task Force internally to drive continuous improvement and awareness (phishing simulations, regular IT security audits, etc.). Additionally, as AI becomes more prevalent, this pillar will cover ethical AI use (ensuring any AI solutions Brayton develops or uses are fair and respect privacy). Our success Indicator will be no data breach incidents; completion of cybersecurity maturity milestones (e.g. external audits passed); high client satisfaction regarding Brayton's data handling.
- 4. Ethics, Integrity & Compliance:** This governance-focused pillar reinforces the company's ethical backbone. It will encapsulate anti-corruption, anti-fraud, and overall compliance efforts. Initiatives include regular anti-corruption training for all employees (especially those in sales and procurement roles), strict enforcement of the Code of Conduct, and a transparent whistleblower system (which is already in place as of 2025). Brayton will also aim for recognised standards such as ISO 37001 (Anti-Bribery Management) or similar by the end of the five years, demonstrating international best practice. Another aspect is governance transparency – e.g. publishing an annual ethics report or summary of whistleblower cases resolved (without sensitive details). Our success Indicator will be 100% employees trained in ethics annually; no confirmed cases of bribery or regulatory fines; a robust compliance audit result each year.
- 5. Responsible Growth & Partnerships:** This pillar covers both Brayton's external partnerships and its environmental stewardship, under the theme of growing responsibly. On the partnerships side, Brayton will implement a Supplier Code of Conduct and due diligence process by 2026, ensure all major suppliers and subcontractors sign on to Brayton's ESG standards (covering labor rights, data security, anti-corruption, environmental care). It will also involve community partnerships – for instance, collaborating with universities or NGOs to support digital education (fulfilling a social community role). On the environment side, this pillar drives Brayton's journey to ISO 14001 certification by setting environmental targets (carbon footprint reduction,

green office initiatives). A flagship goal will be to achieve carbon neutrality for Brayton's own operations by 2030, with interim steps within 2025–2029 such as switching to 100% renewable electricity in offices or adopting a carbon offset program for unavoidable travel. This pillar essentially ensures Brayton's expansion (to new countries or business lines) is accompanied by proportional attention to ethics and sustainability. Our success Indicator will be ISO 14001 achieved by 2026; measurable reduction in carbon emissions by 2029; all critical suppliers vetted for ESG compliance; positive feedback from community stakeholders on Brayton's involvement.

Each pillar will have an executive sponsor and a working group at Brayton, integrating CSR objectives into daily business. By framing the initiative in these thematic pillars, Brayton will communicate internally and externally in an organised way – for example, quarterly updates will highlight progress in each pillar. The pillars also resonate with global frameworks: Inclusive Culture ties to UN Sustainable Development Goal 5 (Gender Equality) and 8 (Decent Work); Health & Well-Being ties to SDG 3 (Good Health); Digital Trust and Integrity align with SDG 16 (Peace, Justice, and Strong Institutions – which includes reducing corruption and ensuring privacy); Responsible Growth links to SDG 12 (Responsible Consumption/ Production) and SDG 13 (Climate Action), as well as SDG 17 (Partnerships for the Goals).

The name and pillars of the new initiative will be introduced to all employees and stakeholders with clear messaging about Brayton's commitments. For example, Brayton will publish a manifesto or policy statement for the "5x5 Sustainability Roadmap" in all CSR annual reports and on our website ([www.braytonglobal.com](http://www.braytonglobal.com)), detailing the pillars, why they matter, and what key targets are set. We will implement visual branding (a logo or icon for the initiative) that will help it become easily recognisable. Brayton will also tie this initiative's timeline to its business strategy timeline, illustrating that sustainability is part of its strategic plan to 2029.

To ensure the initiative's success, Brayton will integrate the 5-year sustainability goals into management KPIs and performance reviews where appropriate. When leaders and departments have sustainability goals alongside financial targets, it embeds the pillars into daily decision-making. Brayton will also run annual "sustainability days" and innovation challenges for each pillar, where teams propose improvements (e.g. a hackathon for digital trust solutions, or a volunteer day for community partnership).

## Our commitment to the UN Global Compact 10 Principles

Brayton Global is registered with and is committed to the Ten Principles of the UN Global Compact form the bedrock of responsible business across four domains: human rights (Principles 1–2), labour standards (Principles 3–6), environmental stewardship (Principles 7–9) and anti-corruption (Principle 10). By embedding these principles into governance, policies and operational procedures, we ensure that respect for individual dignity, fair and safe working conditions, precautionary and proactive environmental measures, and zero-tolerance of corrupt practices are applied consistently in every market and product.

### Commitment Statement

Brayton Global commits to uphold and advance the UN Global Compact's Ten Principles by:

- Respecting and protecting internationally recognised human rights and labour rights within our operations and supply chains.
- Eliminating discrimination, forced or child labour, and supporting freedom of association and collective bargaining.
- Applying a precautionary approach to environmental challenges, promoting resource efficiency and the adoption of clean technologies.
- Enforcing strict anti-corruption measures, with regular training, transparent reporting and a robust whistle-blowing mechanism.

Through governance controls, performance metrics and continuous improvement, we will integrate these principles into our corporate culture and decision-making to drive sustainable value for all stakeholders.



# A move towards Science Based Targets

Brayton Global recognises that the COVID-19 pandemic and the climate emergency are intertwined crises requiring coordinated response. In line with the Science Based Targets initiative and the Business Ambition for 1.5 °C campaign, we affirm that recovery and resilience depend on grounding decisions in science, accelerating the shift to a low-carbon economy, and partnering with policy-makers to enable bold action.

## Commitment Statement

Brayton Global commits to set and pursue ambitious science-based emission-reduction targets aligned with a 1.5 °C trajectory; to divest from fossil fuels and invest in low-carbon, resilient technologies and green jobs; to integrate climate-risk assessment into our recovery and business-continuity planning; and to advocate with governments for recovery packages and policies that enable a rapid, fair transition to a zero-carbon, resilient economy.

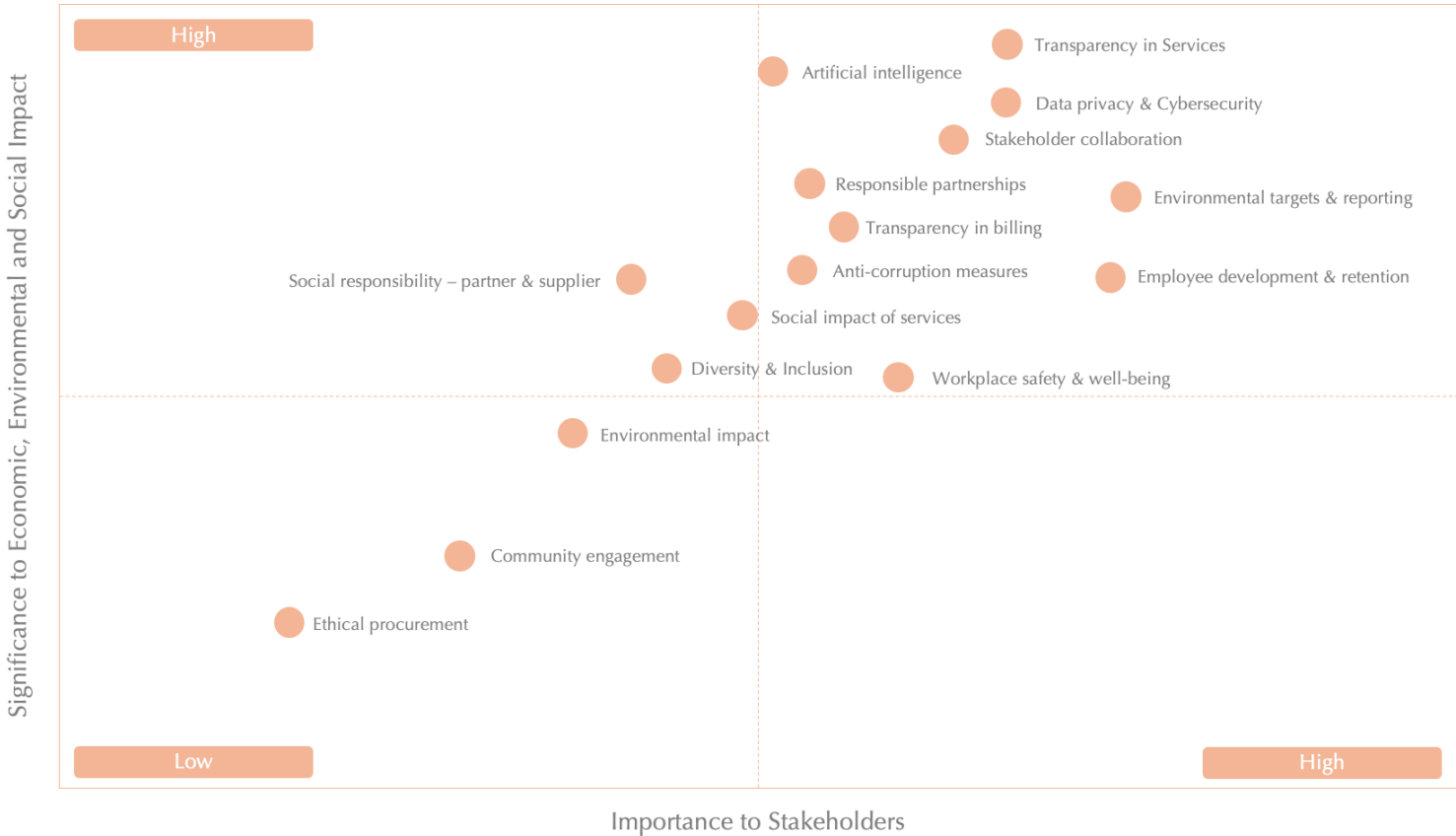


# Turning Priorities into Practice

At Brayton Global, responsibility is not abstract—it's specific, measurable, and driven by what our stakeholders value most.

Through our 2025 materiality assessment, shaped by voices from clients, employees, partners, and regulators, we identified the topics that are most critical to our impact, performance, and long-term value creation.

The pages that follow explore each of these material issues—how they connect to our business model, how we're taking action, and how we measure progress. These themes form the backbone of our sustainability strategy, shaping how we serve, collaborate, innovate, and grow.







# Transparency in Services

## Open communication

### MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



12, 16

### Commitment

Brayton’s commitment to transparency directly supports SDG 12: Responsible Consumption and Production by promoting service clarity, performance accountability, and responsible technology deployment. By clearly communicating what services we provide and how outcomes are measured, we help clients make informed, efficient decisions that minimise resource waste and enhance value creation.

Simultaneously, our approach aligns with SDG 16: Peace, Justice and Strong Institutions through the promotion of accountable and transparent service practices. This includes fair operating procedures, ethical use of AI, and open access to service performance indicators—reinforcing institutional trust and compliance.

Brayton Global is committed to enhancing transparency across all service delivery areas. In 2025, we will baseline key indicators including clarity of service descriptions, client satisfaction with deliverable outcomes, and transparency in the use of AI and automation. Over the next five years, we aim to establish published service standards for all major offerings, introduce outcome-based

reporting dashboards for clients, and integrate AI explainability statements into our solutions. These actions will align with ISO 26000 fair operating practices and support measurable improvements in client trust, regulatory readiness, and service accountability.

### Stakeholder Benefits

Clients gain confidence in Brayton’s deliverables through clear service expectations, leading to stronger contractual relationships and lower delivery risk.

Regulators see proactive alignment with governance and data ethics standards, improving Brayton’s compliance posture and lowering reputational risk.

Employees are empowered with greater clarity on how their work contributes to measurable client outcomes, improving engagement and internal accountability.

Partners benefit from consistent service frameworks and standards that improve interoperability and joint delivery quality.

Wider society benefits from improved digital trust and responsible automation, which contribute to more inclusive and fair service environments.

### Communication Impact

Publishing service standards, sharing outcome metrics, and clarifying AI deployment enhances external communications by offering verifiable proof of performance. Internally, it strengthens alignment between teams, reinforces ethical conduct, and embeds a culture of transparency.

### Transparency in Services – impact tracking framework

Below is a tailored framework for capturing and reporting performance annually.

Category	Indicator	Metric Type	Data Source	Reporting Frequency
Service Clarity & Scope	% of services with published scope and deliverables in client documentation	Quantitative	Service catalogues / client onboarding packs	Annual
Service Clarity & Scope	% of service lines with clearly defined SLAs and KPIs shared with clients	Quantitative	Project documentation / service agreements	Annual
Performance Reporting	% of active projects with regular performance reporting (dashboards, reports)	Quantitative	PMO reporting systems / client dashboards	Quarterly
Performance Reporting	Client satisfaction score related to service clarity and expectations (survey)	Qualitative (Survey)	Client satisfaction surveys	Annual
Client Communication	% of contracts with transparent billing structures and no hidden fees	Quantitative	Contract database	Annual
Client Communication	Number of client queries or disputes related to unclear pricing resolved	Quantitative	Client service logs / CRM	Annual
Contractual Transparency	% of AI-powered services with explanations of how outputs are generated	Quantitative	Technical documentation / AI tool descriptions	Annual
Contractual Transparency	% of automation processes with human oversight and auditability	Quantitative	Automation platform logs	Annual
Use of AI & Automation	Number of service reviews conducted with client participation	Quantitative	Project governance records	Annual
Governance & Accountability	Existence and regular update of service transparency policy	Qualitative	Internal policy registry	Annual







Commitment

At Brayton Global, talent is our business. As a consultancy and IT services firm operating across Europe, our ability to attract, develop, and retain high-performing people is essential to our client delivery, market reputation, and growth trajectory. We treat employee development not as an optional benefit, but as a strategic function integrated into how we onboard, manage, and advance our workforce.

Our commitment focuses on enabling our people to grow professionally through structured learning, on-the-job development, and career mobility. This includes personalised development plans, access to technical and soft-skills training, and targeted upskilling for evolving client and market needs. We also invest in future leaders by providing mentorship, project ownership, and exposure to cross-functional challenges. Importantly, development opportunities are made available equitably—regardless of role, background, or location.

This approach supports:

- SDG 4 (Quality Education) by providing continuous learning opportunities that are

relevant, practical, and accessible across our workforce.

- SDG 8 (Decent Work and Economic Growth) by enabling employees to perform meaningful, skilled work and progress in their careers in line with fair and inclusive practices.

How this helps our Stakeholders, Communication, and People

Employees gain clear pathways for growth, boosting motivation, confidence, and long-term retention.

Clients benefit from a capable and future-ready delivery team with the expertise to solve modern challenges.

Candidates see Brayton as a company that invests in potential, not just experience, improving recruitment outcomes.

Partners and public institutions value our contribution to workforce development and digital inclusion in the labour market.

Communication Impact

We communicate development progress through internal career mobility dashboards, training calendars, and performance conversations. Our learning culture is promoted through recognition of effort, peer sharing, and visibility of success stories. Externally, we highlight investment in people as a core part of our value proposition.

Employee Development impact tracking framework

The following framework captures and reports on employee development outcomes annually, ensuring alignment with business value and SDG targets.

Category	Indicator	Metric Type	Data Source
Learning Access	% of employees with access to formal learning platforms or resources	Quantitative	Learning Management System (LMS)
Learning Access	Average hours of learning completed per employee per year	Quantitative	LMS / HR reporting
Upskilling & Reskilling	% of employees completing role-relevant upskilling programmes	Quantitative	HR / L&D team records
Upskilling & Reskilling	Number of cross-training or multi-disciplinary learning initiatives	Quantitative	L&D programme trackers
Career Progression	% of roles filled internally (internal mobility rate)	Quantitative	HRIS or internal promotion logs
Career Progression	% of employees receiving career development feedback annually	Quantitative	Performance management system
Equity & Inclusion in Development	% of underrepresented groups participating in development initiatives	Quantitative	HR analytics and D&I dashboards
Equity & Inclusion in Development	Parity in training access across job levels and geographies	Quantitative	Training attendance reports
Leadership & High-Potential Development	% of managers participating in leadership or mentoring programmes	Quantitative	Leadership development programme logs
Leadership & High-Potential Development	Number of high-potential employees identified and supported	Quantitative	Talent pipeline data
Training Effectiveness	Post-training satisfaction or learning application (survey)	Quantitative (Survey)	Training feedback forms
Training Effectiveness	% of training linked to client service or operational outcomes	Quantitative	Training impact assessments
Employee Engagement	Employee satisfaction with development opportunities (survey)	Qualitative (Survey)	Annual engagement or pulse surveys







# Workplace Safety & Well-being

Ensuring a safe and healthy environment for all

MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



3, 8

Commitment

At Brayton Global, we recognise that the health, safety, and well-being of our people are prerequisites for delivering high-quality services. In a sector where intellectual performance, problem-solving, and client responsiveness are key, we treat well-being as a strategic enabler—not just an HR function. Whether in client-facing roles, project teams, or back-office support, our people work best when they feel secure, respected, and mentally supported.

Our safety and well-being practices are designed around the realities of our business—distributed teams, project-based delivery, hybrid working, and high client expectations. We maintain safe office environments, enforce structured incident management protocols, and ensure all staff can report risks or concerns without fear. Mental well-being is a priority, supported through check-ins, workload management, and access to confidential support. We also embed good health principles into our working culture—promoting rest, work-life balance, and inclusion as components of a healthy workplace.

This commitment supports:

- SDG 3 (Good Health and Well-being) by fostering physical safety, mental health, and preventive health practices in a modern consulting environment.
- SDG 8 (Decent Work and Economic Growth) by ensuring our people are supported to work productively in safe conditions, with dignity and respect for individual needs.

How this helps our Stakeholders, Communication, and People

Employees benefit from clear expectations, access to well-being resources, and safe working conditions—whether in the office or on client assignments.

Clients benefit from sustainable service quality and lower delivery risk through healthy, stable, and supported delivery teams.

Regulators and institutional partners see evidence of proactive governance and care, essential in sectors where contractor health oversight is increasingly scrutinised.

Communication Impact



We integrate safety and well-being into internal communications, onboarding, and operational planning. Our policies are backed by measurable action—capturing feedback, analysing risks, and taking visible action on concerns. Externally, Brayton’s culture of care and responsibility enhances our credibility as a people-first business partner.

Impact Tracking Framework that reflects this commitment and is aligned with SDGs 3 and 8.

Category	Indicator	Metric type	Data source	Reporting frequency
Health & Safety Governance	Existence of safety & well-being policy reviewed annually	Qualitative	HR / H&S Policy Register	Annual
Health & Safety Governance	% of staff covered by health & safety risk assessments	Quantitative	Risk Assessment Logs	Annual
Incident & Risk Management	Number of workplace incidents (injury, near miss, hazard reported)	Quantitative	Incident Management System	Quarterly
Incident & Risk Management	Resolution rate of reported safety or well-being issues	Quantitative	Issue Tracking System	Quarterly
Mental Health & Well-being	Access to mental health support (EAPs, sessions, digital tools)	Quantitative	HR or Well-being Support Usage	Annual
Mental Health & Well-being	% of staff who report manageable stress levels (survey)	Quantitative (Survey)	Annual Employee Survey	Annual
Workplace Conditions	% of workspaces compliant with ergonomic standards	Quantitative	Office Audit Reports	Annual
Workplace Conditions	Employee satisfaction with working environment (survey)	Quantitative (Survey)	Staff Feedback Tools	Annual
Workload & Burnout Prevention	Average weekly working hours vs contract baseline	Quantitative	Time-tracking or manager review	Quarterly
Workload & Burnout Prevention	% of roles monitored for burnout risk indicators	Quantitative	HR Analytics / Team Leads	Quarterly
Training & Awareness	% of employees trained in health, safety and well-being topics	Quantitative	Training Logs / LMS	Annual
Training & Awareness	Frequency of well-being awareness campaigns or events	Quantitative	Internal Comms Calendar	Annual
Employee Engagement & Feedback	Employee feedback scores on health and well-being topics	Qualitative (Survey)	Engagement or Pulse Surveys	Annual





# Environmental targets

## Reporting on our environmental goals

### MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation

### Commitment

As a professional services firm operating across Europe, Brayton Global depends on human connection—across projects, partners, and clients. While travel and event participation are business enablers, we recognise they also contribute to our environmental footprint through emissions, resource consumption, and waste generation.

Our responsibility is to minimise the environmental impact of how we travel, meet, and engage—without compromising the quality of our service delivery. We prioritise digital collaboration, low-emission transport options, and conscious event planning to reduce waste, water use, and energy consumption. Where physical presence is required, we select partners (venues, logistics, hotels) based on their environmental credentials and aim to align our practices with ISO 20121 for sustainable event management.

This commitment supports:

- SDG 6 (Clean Water and Sanitation) by choosing venues and suppliers that manage water use responsibly.

- SDG 7 (Affordable and Clean Energy) by favouring partners powered by renewables and promoting energy efficiency during business activities.
- SDG 12 (Responsible Consumption and Production) through sustainable procurement and reduced material waste across events and travel.
- SDG 13 (Climate Action) by lowering emissions from travel, promoting carbon efficiency, and tracking our environmental impact.
- SDG 14 (Life Below Water) and SDG 15 (Life on Land) by reducing pollution and habitat impact through careful event planning and travel reduction strategies.

### How this helps our Stakeholders, Communication, and People

Clients receive services from a supplier that takes carbon responsibility seriously—enhancing compliance with institutional sustainability targets.

Employees experience a culture where efficiency and responsibility guide travel decisions, reducing

fatigue and increasing purpose.

Partners and venues are encouraged to meet higher environmental standards through Brayton’s procurement and collaboration practices.

Communities and ecosystems are protected from avoidable pollution, emissions, and unsustainable resource use tied to business activity.

### Communication impact

Brayton Global communicates this commitment through travel policies, event checklists, and emissions tracking summaries. Internally, it reinforces a culture of minimal-impact engagement. Externally, it positions Brayton as a responsible operator aligned with the environmental expectations of its clients and society.

### Environmental Impact of Travel & Events – impact tracking framework

The following framework supports consistent, measurable tracking of Brayton’s travel and event-related environmental footprint and reporting is conducted annually.

Category	Indicator	Metric type	Data source
Business Travel Emissions	Total business travel emissions (CO <sub>2</sub> e) per year	Quantitative	Travel expense and carbon tracking tools
Business Travel Emissions	% of travel undertaken via low-emission methods (rail, EV, direct flights)	Quantitative	Travel booking systems / modes selected
Sustainable Travel Choices	% of trips avoiding travel due to digital collaboration tools	Quantitative	IT / collaboration logs
Sustainable Travel Choices	Average emissions per trip per employee	Quantitative	Travel reports by staff or finance
Event Sustainability	% of events held with sustainability plan (ISO 20121-aligned or similar)	Quantitative	Event planning documentation
Event Sustainability	% of events offering vegetarian/low-impact catering options	Quantitative	Event supplier menus and planning docs
Supplier & Venue Standards	% of travel/event suppliers with environmental certifications (e.g. ISO 14001)	Quantitative	Supplier due diligence or contracts
Supplier & Venue Standards	% of venues using renewable energy or efficient water/waste systems	Quantitative	Venue and supplier ESG documentation
Waste & Resource Use	Volume of event waste generated (kg) and % recycled or avoided	Quantitative	Event waste logs / venue reporting
Waste & Resource Use	% of events using digital materials instead of printed media	Quantitative	Event collateral inventory
Awareness & Governance	% of staff aware of and adhering to sustainable travel/event policy	Qualitative (Survey)	Staff survey / travel induction compliance records





Commitment

Brayton Global operates as a networked organisation—delivering services and value through a diverse ecosystem of consultants, subcontractors, vendors, and strategic partners. With this reach comes responsibility: how our partners operate reflects directly on our brand, values, and licence to serve regulated markets.

We believe that responsible business conduct must extend across our value chain. We expect our suppliers and partners to uphold human rights, provide decent working conditions, prevent exploitation, and actively manage environmental and data protection risks. These expectations are built into how we select, onboard, and evaluate partners. All new suppliers are now subject to ESG screening, and social responsibility is embedded in our contractual frameworks through compliance clauses and declarations of alignment.

As our delivery model scales, our social responsibility must scale with it. We aim to strengthen relationships with suppliers who share our values—those who treat people fairly, operate transparently, and contribute to positive social and environmental outcomes in their communities.

- This commitment supports:
- SDG 8 (Decent Work and Economic Growth) by promoting ethical labour standards, fair remuneration, and workplace safety across our supplier network.
  - SDG 12 (Responsible Consumption and Production) through responsible sourcing and shared accountability for social and environmental risks in our supply chain.
  - SDG 17 (Partnerships for the Goals) by co-creating value with suppliers who actively engage in sustainable development goals.

**How this helps our Stakeholders, Communication, and People**

Clients are reassured that Brayton’s suppliers meet ethical standards that support compliant, socially responsible delivery.

Suppliers gain access to stable, fair relationships and opportunities to improve through shared performance dialogue.

Internal teams have clear guidance for selecting and managing partners based on defined social

responsibility expectations.

Communities and institutions benefit from ripple effects of ethical sourcing—especially where we deliver services in local, underserved, or cross-border contexts.

Communication impact

We share our expectations with partners through codes of conduct, onboarding protocols, and regular reviews. We report on compliance, escalate non-conformities, and reward alignment with joint opportunity. Our goal is to turn every supplier into a responsible ally—not just a transaction.

Supplier & partner social responsibility – impact tracking framework

The framework below supports the consistent monitoring, evaluation, and communication of Brayton’s social responsibilities across operations and partners, with reporting conducting annually.

Category	Indicator	Metric type	Data source	Reporting frequency
Carbon Emissions	Total Scope 1 and 2 emissions (CO <sub>2</sub> e) per year	Quantitative	Carbon audit reports	Annual
Carbon Emissions	% of energy consumption from renewable sources	Quantitative	Energy supplier records	Annual
Energy Use	Total electricity consumption per office/site (kWh)	Quantitative	Utility billing systems	Quarterly
Energy Use	% of waste diverted from landfill (recycled, reused)	Quantitative	Facilities / waste reports	Quarterly
Waste Management	Volume of e-waste responsibly processed	Quantitative	IT asset management / disposal logs	Annual
Waste Management	Water consumption per location (litres)	Quantitative	Water utility data	Quarterly
Water & Resource Efficiency	% of green-certified or low-impact products procured	Quantitative	Procurement system / supplier data	Annual
Water & Resource Efficiency	% of staff trained on environmental awareness or policy	Quantitative	LMS / training logs	Annual
Sustainable Procurement	% of staff participating in environmental actions or initiatives	Quantitative	HR activity participation logs	Annual
Employee Engagement & Practices	Environmental awareness level (survey score)	Qualitative (Survey)	Internal staff survey	Annual





### Commitment

Brayton Global recognises that the quality and integrity of our partnerships directly influence our service delivery, reputation, and long-term resilience. In 2025, we will baseline the ESG maturity of our partner and supplier network, assessing alignment with our ethical, social, and environmental standards. Over the next five years, we commit to embedding ESG criteria into all partnership due diligence processes, integrating clauses on ethical conduct, data protection, labour practices, and environmental performance into 100% of new supplier contracts. We will also launch a partner engagement programme focused on shared ESG goals, joint capability development, and performance transparency.

This approach aligns with:

- SDG 12 (Responsible Consumption and Production) by ensuring our value chain applies sustainable practices and avoids negative environmental or social impact.
- SDG 16 (Peace, Justice and Strong Institutions) by promoting ethical, accountable, and transparent partner governance in all contracts and engagements.

- SDG 17 (Partnerships for the Goals) through structured collaboration with partners to drive mutual improvement in sustainability performance and shared responsibility for positive outcomes.

#### How this helps our Stakeholders, Communication, and People

Clients benefit from risk mitigation and delivery assurance when Brayton's extended ecosystem meets high ethical and quality standards. It increases trust in our ability to manage critical and public-sector projects.

Suppliers and Partners gain clarity on expectations and opportunities to co-develop ESG capabilities, deepening long-term business relationships and enabling shared innovation.

Employees are reassured that the company stands behind ethical practices throughout its operations, fostering internal pride and cultural alignment.

Regulators and society observe clear accountability mechanisms and proactive ESG enforcement beyond Brayton's internal operations, demonstrating leadership in

responsible business conduct.

### Communication Impact

We will enhance our supplier and partner reporting by publicly disclosing progress toward ESG integration goals and sharing selected partnership case studies. Internally, this commitment enables better coordination across procurement, delivery, and legal teams, and externally, it reinforces Brayton's position as a trusted, forward-looking IT services partner operating within a sustainable and ethical business model.

### Responsible Partnerships – impact tracking framework

Below is a tailored framework for capturing and reporting performance annually.

Category	Indicator	Metric type	Data source	Reporting frequency
Partner Selection & Due Diligence	% of new partners undergoing ESG and compliance screening	Quantitative	Procurement & partner onboarding records	Annual
Partner Selection & Due Diligence	Existence of a formal partner selection process with social/ environmental criteria	Qualitative	Partner evaluation templates	Annual
Alignment on ESG Standards	% of partners with signed code of conduct or responsible business charter	Quantitative	Contract database / partner agreement archive	Annual
Alignment on ESG Standards	% of partners reporting on ESG or equivalent performance metrics	Quantitative	Partner CSR reports / disclosures	Annual
Performance & Risk Management	% of strategic partners with active performance or risk reviews	Quantitative	Partnership performance review logs	Quarterly
Performance & Risk Management	Number of issues raised and resolved in partnership governance forums	Quantitative	Governance meeting minutes / issue tracker	Quarterly
Transparency & Communication	% of partners engaged in regular two-way communication (feedback, review)	Quantitative	CRM / partner engagement records	Quarterly
Transparency & Communication	Number of co-developed initiatives or service enhancements	Quantitative	Project documentation / innovation logs	Annual
Collaboration & Value Creation	% of projects delivered through multi-party or ecosystem-based collaboration	Quantitative	Delivery reports / project structures	Annual
Collaboration & Value Creation	Satisfaction rating of partners on Brayton's collaboration practices (survey)	Qualitative (Survey)	Partner feedback surveys	Annual



# Data privacy & Cybersecurity

## Investment in data security

### MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



9, 16

### Commitment

At Brayton Global, safeguarding information is not just a compliance requirement—it is a cornerstone of our operational integrity and a key driver of client trust. As a service provider working with public institutions and regulated sectors, our responsibility extends beyond technical protection. We embed data privacy and cybersecurity into our governance framework, procurement practices, and service delivery lifecycle to ensure the confidentiality, availability, and integrity of all data entrusted to us. This includes client systems, employee records, and third-party information.

Cybersecurity and data privacy are integral to our business resilience, reputation, and service continuity. We adopt a risk-based approach to information security, ensuring all functions—whether service desk, development, or consultancy—adhere to minimum security standards and privacy-by-design principles. Through third-party risk assessments, encryption protocols, breach readiness, and employee awareness training, we aim to operationalise security as a shared responsibility across our workforce and supplier base.

This commitment supports:

- SDG 9 (Industry, Innovation and Infrastructure) by strengthening secure and resilient digital infrastructure that underpins reliable public and private services.
- SDG 16 (Peace, Justice and Strong Institutions) by protecting stakeholders from misuse of information, enforcing accountability mechanisms, and maintaining integrity in our digital operations.

### How this helps our Stakeholders, Communication, and People

Clients and partners gain assurance that Brayton operates with high data protection standards, enabling them to meet their own regulatory and contractual obligations.

Employees are protected through robust controls over personal and professional data, creating a culture of digital responsibility and security awareness.

Regulators view Brayton as a reliable partner that does not treat cybersecurity reactively but as an

embedded feature of good governance.

Society benefits from the reduction of digital risk in essential services, particularly in sectors that handle sensitive citizen data.

### Communication Impact

We proactively communicate our data protection standards through privacy notices, supplier policies, and client onboarding documentation. Incident transparency and post-event learnings are key components of our security culture. Internally, secure-by-default practices and role-based data access enhance operational clarity and compliance readiness. This positions Brayton as a digitally mature, trustworthy provider in an environment of escalating cyber risk and evolving privacy regulations.

### Data privacy and Cybersecurity – impact tracking framework

Below is a tailored framework for capturing and reporting performance annually.

Category	Indicator	Metric type	Data source	Reporting frequency
Policy & Governance	Existence and annual review of data privacy and cybersecurity policies	Qualitative	Policy register and review logs	Annual
Policy & Governance	% of employees and contractors trained on GDPR and cybersecurity	Quantitative	HR training records / LMS	Annual
Training & Awareness	Number of phishing simulations conducted and click-through rate	Quantitative	IT security awareness platform	Quarterly
Training & Awareness	Number of reported security incidents or data breaches	Quantitative	Incident reporting system / IT logs	Quarterly
Incident Management	% of incidents resolved within SLA with documented root cause analysis	Quantitative	Incident management reports	Quarterly
Incident Management	Completion of internal or third-party cybersecurity audits	Quantitative	Audit reports / compliance logs	Annual
Compliance & Audit	% of systems covered by up-to-date endpoint protection and monitoring	Quantitative	IT asset management / security tools	Quarterly
Compliance & Audit	% of client projects with data privacy risk assessments completed	Quantitative	Project onboarding / risk assessments	Annual
Technology & Controls	Frequency of vulnerability scanning and patching cycles	Quantitative	IT operations / security team logs	Quarterly
Technology & Controls	Use of encryption and multi-factor authentication across key systems	Quantitative	System configuration and access control reports	Annual





# Stakeholder collaboration

Involving everyone in designing our initiatives

## MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



16, 17

### Commitment

At Brayton Global, stakeholder collaboration is central to how we design, deliver, and improve services. Whether we are working with EU institutions, subcontracted consultants, client-side partners, or regulators, our success depends on coordinated action and shared purpose. We view collaboration not as consultation or compliance, but as a mutual process that builds trust, identifies risks early, and drives better outcomes for all parties involved.

Our engagement model ensures that stakeholders—internal and external—have structured opportunities to contribute, challenge, and co-create. This includes joint planning with clients, transparent feedback loops with contractors, and alignment sessions with delivery partners. Internally, our teams are trained to communicate openly, resolve conflicts constructively, and operate with a stakeholder-first mindset. Externally, we tailor our approach to reflect the governance, culture, and communication expectations of each client or consortium partner.

This commitment supports:

- SDG 16 (Peace, Justice and Strong Institutions) by promoting inclusive, responsive, and accountable governance practices through our engagements.
- SDG 17 (Partnerships for the Goals) by building cross-sector and cross-border collaborations that enhance delivery impact and advance shared sustainability objectives.

#### How this helps our Stakeholders, Communication, and People

Clients gain confidence that Brayton anticipates needs, adapts early, and builds governance models that reflect complexity and diversity.

Contractors and partners feel respected, heard, and aligned—driving performance and long-term retention.

Internal teams gain clarity and purpose through regular engagement with external stakeholders, reducing friction and improving responsiveness.

Public institutions and regulators benefit from transparency, integrity, and multi-actor delivery that supports institutional resilience.

### Communication impact

We communicate our commitment to stakeholder collaboration through governance charters, project onboarding processes, multi-party coordination plans, and open performance reviews. These channels reinforce Brayton Global's identity as a structured, reliable, and values-driven collaborator.

### Stakeholder Collaboration – impact tracking framework

Below is a practical framework to capture and report on stakeholder collaboration outcomes annually.

Category	Indicator	Metric type	Data source	Reporting frequency
Stakeholder Mapping & Inclusion	% of major projects with stakeholder mapping completed at initiation	Quantitative	Project onboarding documentation	Annual
Stakeholder Mapping & Inclusion	Number of stakeholder types actively engaged (clients, consultants, partners, regulators)	Quantitative	Stakeholder registers or CRM	Annual
Engagement Quality	% of stakeholders participating in structured engagements (kick-offs, reviews, retrospectives)	Quantitative	Meeting logs / project governance trackers	Quarterly
Engagement Quality	Stakeholder satisfaction score from engagement surveys	Qualitative (Survey)	Stakeholder engagement surveys	Annual
Governance & Coordination	% of projects with documented governance and collaboration plans	Quantitative	Project governance plans / PMO records	Annual
Governance & Coordination	Frequency of cross-functional or cross-organisational coordination meetings	Quantitative	Meeting calendars / minutes	Quarterly
Feedback & Responsiveness	Number of stakeholder-raised issues resolved within agreed SLA	Quantitative	Issue tracking tools / client feedback systems	Quarterly
Feedback & Responsiveness	Use of feedback mechanisms (e.g. 360 reviews, anonymous feedback) per project	Qualitative	Engagement reports / internal audit	Annual
Partner Alignment	% of partners with aligned ESG or CSR priorities in joint projects	Quantitative	Partner contracts or ESG alignment checks	Annual
Partner Alignment	Number of joint initiatives launched with client or external stakeholders	Quantitative	Project documentation / initiative trackers	Annual
Capacity Building	Number of Brayton team members trained in stakeholder engagement skills	Quantitative	Training records / HR systems	Annual





# Artificial Intelligence

## Integrating AI considerations into our CSR

### MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



### Commitment

As a people-first digital consultancy, Brayton Global integrates artificial intelligence to improve service delivery, enhance decision-making, and create value for clients. However, we also recognise that AI must be deployed responsibly—with clear oversight, human alignment, and safeguards against unintended consequences. Our approach to AI is not one of unchecked innovation, but of ethical enablement and stakeholder trust.

We use AI to streamline internal processes, support client systems, and optimise recruitment and project delivery workflows. Wherever AI is involved, we ensure its use aligns with our values of transparency, fairness, and inclusion. We consider bias mitigation, explainability, and human oversight as non-negotiable requirements in both our advisory work and internal tools. We also invest in the upskilling of our people to work alongside AI confidently and safely—ensuring that automation is a tool for inclusion, not displacement.

This commitment supports:

- SDG 4 (Quality Education) by enabling digital skills development for employees and clients

as AI adoption grows.

- SDG 5 (Gender Equality) and SDG 10 (Reduced Inequalities) by designing, selecting, and applying AI tools in ways that avoid bias and exclusion.
- SDG 8 (Decent Work and Economic Growth) by creating new digital career paths and reducing the repetitive burden of administrative work.
- SDG 16 (Peace, Justice and Strong Institutions) by promoting accountability and transparency in algorithmic decision-making.
- SDG 17 (Partnerships for the Goals) by working with vendors, clients, and institutions to establish responsible AI standards and shared ethical practices.

### How this helps our Stakeholders, Communication, and People

Clients receive assurance that Brayton's AI applications and recommendations are secure, explainable, and compliant with EU and national ethical frameworks.

Employees and consultants benefit from AI tools

that enhance—not replace—their work, along with training to adapt to changing skills demands.

Public stakeholders and institutions gain confidence that AI-driven efficiencies will be delivered without undermining rights, diversity, or due process.

Partners and vendors are expected to meet our ethical AI criteria and contribute to a shared ecosystem of responsible technology.

### Communication impact

We communicate our AI standards through project governance, client briefings, internal development policies, and ethical use declarations. Internally, our message is clear: AI is a tool to serve people, not to replace their value. Externally, we reinforce Brayton Global's identity as a future-ready, human-centred service provider in an automated world.

### Artificial Intelligence – impact tracking framework

The following framework supports structured measurement of how AI is deployed, governed, and aligned with Brayton's ESG and CSR principles and reporting is conducted annually.

Category	Indicator	Metric Type	Data Source
AI Governance & Ethics	% of AI use cases reviewed through internal ethical risk assessment	Quantitative	AI risk register / internal compliance logs
AI Governance & Ethics	Existence of internal AI use policy and compliance with EU AI Act principles	Qualitative	AI policy and governance documentation
Bias & Inclusion	% of AI tools evaluated for bias mitigation (gender, race, age)	Quantitative	Tool review logs / DEI assessments
Bias & Inclusion	Representation of diverse groups in AI testing and feedback processes	Quantitative	Test feedback reports / project participation data
Workforce Enablement	% of staff trained on AI literacy and responsible usage	Quantitative	HR / L&D training records
Workforce Enablement	Number of workflows enhanced by AI where human oversight is maintained	Quantitative	Process automation logs / team reports
Client Implementation	% of client-facing AI projects that include governance and ethics review	Quantitative	Project documentation / PMO reports
Client Implementation	Client satisfaction or understanding of AI-enabled solutions (survey)	Qualitative (Survey)	Client feedback surveys
Transparency & Explainability	% of AI use cases where decision outputs are explainable to non-technical users	Quantitative	AI tool configuration / system logs
Transparency & Explainability	% of projects with AI audit logs or decision traceability mechanisms	Quantitative	Technical audit logs / system metadata
Partnership & Ecosystem	Number of joint initiatives on responsible AI with clients or vendors	Quantitative	CSR / partnership engagement records





# Financial transparency

Absence of hidden costs and billing practices

## MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



### Commitment

At Brayton Global, financial transparency is a cornerstone of how we build trust—with clients, suppliers, regulators, and internal stakeholders. As a company delivering services through complex, often public-sector contracts, our commercial practices must be both fair and clearly understood. Transparent billing, predictable pricing structures, and open reporting on value delivered are essential to maintaining long-term partnerships and upholding our reputation as a responsible service provider.

Our approach integrates financial transparency at multiple levels: contractual terms, project reporting, invoicing processes, and supplier engagement. Clients can expect clear cost breakdowns, proactive communication of changes, and documentation that supports traceability and accountability. Internally, financial responsibility is embedded into our governance structure—ensuring that pricing decisions, margin management, and supplier payments reflect ethical business conduct. Externally, our transparency practices reduce risk and help public buyers meet their procurement obligations under frameworks such as the EU Financial Regulation.

This commitment supports:

- SDG 12 (Responsible Consumption and Production) by promoting clear, accurate financial data that supports responsible procurement and contract execution.
- SDG 16 (Peace, Justice and Strong Institutions) through transparent, anti-fraud financial practices that contribute to public trust and institutional accountability.

### How this helps our Stakeholders, Communication, and People

Clients benefit from predictable pricing, transparent billing, and confidence in Brayton's commercial conduct—supporting long-term contracts and audit-readiness.

Suppliers experience fair, timely payment and visibility into their commercial standing with Brayton, reinforcing trust and continuity.

Employees and delivery teams are supported by clarity around project budgets and commercial expectations, reducing confusion and misalignment.

Regulators and public buyers see strong alignment with ethical procurement and financial integrity standards.

### Communication impact

We communicate our financial transparency commitment through service agreements, client portals, project reporting packs, and accessible invoicing formats. Internally, finance and delivery teams are aligned on project cost tracking and margin health. Externally, transparency is a competitive differentiator—enabling Brayton Global to stand out as a dependable, values-driven business partner.

### Financial Transparency impact tracking framework

The following framework helps Brayton capture, monitor, and report on financial transparency practices annually, ensuring alignment with SDGs 12 and 16.

Category	Indicator	Metric Type	Data Source	Reporting Frequency
Client Pricing & Billing	% of contracts with clearly defined pricing and service scope	Quantitative	Contract database	Annual
Client Pricing & Billing	% of clients receiving regular project financial reporting (e.g. cost-to-date, forecast)	Quantitative	Project reporting system	Quarterly
Invoicing Accuracy & Timeliness	% of invoices issued on time	Quantitative	Invoicing platform / Finance system	Quarterly
Invoicing Accuracy & Timeliness	% of invoices accepted without dispute or rework	Quantitative	Client feedback or AR records	Quarterly
Internal Financial Governance	Frequency of internal budget reviews by delivery or management teams	Quantitative	Internal finance review logs	Quarterly
Internal Financial Governance	% of staff with budgetary responsibility receiving financial governance training	Quantitative	Training records (finance/governance)	Annual
Procurement & Supplier Finance	% of suppliers paid within agreed payment terms	Quantitative	Accounts payable records	Quarterly
Procurement & Supplier Finance	% of procurement files with full financial documentation (e.g. POs, quotes, approvals)	Quantitative	Procurement compliance files	Annual
Compliance & Risk	Number of reported financial discrepancies or suspected fraud cases	Quantitative	Whistleblower reports or compliance logs	Quarterly
Compliance & Risk	Completion of financial risk assessments for high-value projects	Quantitative	Risk register or audit trails	Annual
Stakeholder Engagement	% of clients or stakeholders rating Brayton's financial communication as clear (survey)	Qualitative (Survey)	Client satisfaction survey / stakeholder feedback	Annual







# Anti-corruption Measures

Credibility as a partner, employer and provider

**MATERIAL TOPIC**

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



### Commitment

Brayton Global operates in an environment where transparency, accountability, and ethical conduct are non-negotiable. As a company delivering services to public institutions and corporate clients, our credibility depends on the integrity of every decision, contract, and transaction. Corruption—whether in procurement, recruitment, subcontracting, or financial reporting—poses unacceptable risks to our business, our partners, and the stakeholders we serve.

We maintain a zero-tolerance approach to bribery, fraud, collusion, and facilitation payments. Our governance framework includes a code of ethics, anti-corruption training, internal controls, whistleblowing channels, and third-party due diligence. These practices are embedded into how we engage with clients, evaluate suppliers, structure partnerships, and manage commercial activities. Importantly, our approach focuses not just on detection and compliance, but on prevention through culture, leadership, and risk awareness.

This commitment supports:

- SDG 16 (Peace, Justice and Strong Institutions)

by upholding legal compliance, transparency, and ethical standards within and beyond Brayton's operations.

**How this helps our Stakeholders, Communication, and People**

Clients receive services from a provider that can withstand scrutiny and meet public sector integrity expectations.

Partners and suppliers are held to equivalent standards, reducing exposure to reputational and contractual risk.

Employees are empowered to act ethically, report concerns safely, and uphold the company's values in high-pressure or cross-border situations.

Investors and regulators gain confidence that Brayton's operations are structured to minimise governance risk and promote responsible growth.

**Communication Impact**

We communicate our anti-corruption stance clearly through onboarding, supplier agreements, and regular compliance updates. Our leadership reinforces these principles consistently, and our

reporting mechanisms ensure confidentiality and accountability. Internally, we make it clear that integrity is not optional—it is foundational to our business model and client trust.

**Anti-Corruption impact tracking framework**

This simple framework captures the effectiveness and enforcement of Brayton's anti-corruption controls on an annual basis.

Category	Indicator	Metric Type	Data Source	Reporting Frequency
Policy & Governance	Existence and review of anti-corruption policy and code of ethics	Qualitative	Policy documents & legal register	Annual
Policy & Governance	% of contracts including anti-bribery and compliance clauses	Quantitative	Contract database	Annual
Training & Awareness	% of employees trained on anti-corruption and ethical conduct	Quantitative	Training logs / LMS	Annual
Training & Awareness	% of senior staff completing advanced ethics training	Quantitative	HR / Compliance training records	Annual
Incident Reporting & Resolution	Number of reported incidents related to bribery, fraud, or misconduct	Quantitative	Incident reporting system	Quarterly
Incident Reporting & Resolution	% of reported incidents resolved with documented outcome	Quantitative	Compliance resolution logs	Quarterly
Third-Party Risk Management	% of suppliers and subcontractors screened for corruption risk	Quantitative	Supplier due diligence records	Annual
Third-Party Risk Management	Number of supplier or partner engagements terminated due to violations	Quantitative	Procurement & legal documentation	Annual
Monitoring & Enforcement	Internal audits covering compliance or anti-corruption controls	Quantitative	Internal audit reports	Annual
Monitoring & Enforcement	Corrective actions initiated from compliance reviews or breaches	Quantitative	Compliance tracker	Annual
Culture & Leadership	% of staff who agree leadership promotes ethical conduct (survey)	Qualitative (Survey)	Employee engagement or ethics survey	Annual





# Social impact of our work

Our projects create positive social change

## MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



4, 8, 10, 17

### Commitment

Brayton Global's core business—recruitment, consultancy, and digital services—generates direct social value by connecting people to work, upskilling the workforce, and supporting the delivery of public services across Europe. Our impact is not limited to commercial performance; it extends to the quality of employment we enable, the communities we serve, and the institutional systems we help modernise.

Our commitment is to design and deliver services that contribute positively to society: whether by placing consultants into public sector projects that improve citizen outcomes, supporting clients in building inclusive digital services, or enabling career access for underrepresented groups. We measure our social impact not in theory but in placements made, jobs sustained, skills transferred, and improvements to end-user experience. As a trusted partner to European institutions, Brayton acts as an enabler of progress—not just an external contractor.

This commitment supports:

- SDG 4 (Quality Education) by facilitating access to skills development and continuous learning

across client and candidate networks.

- SDG 8 (Decent Work and Economic Growth) by enabling sustainable, high-quality employment and supporting future-ready labour markets.
- SDG 10 (Reduced Inequalities) by removing barriers to participation in the digital economy through equitable sourcing and service delivery.
- SDG 17 (Partnerships for the Goals) by collaborating with clients, governments, and suppliers to achieve shared social value.

### How this helps our Stakeholders, Communication, and People

Clients benefit from a supplier who delivers more than technical output—Brayton contributes to citizen outcomes, service equity, and policy delivery.

Consultants and candidates gain meaningful, fair work in roles that align with their career development and societal impact goals.

Internal teams are motivated by the visible social contribution of their work, improving purpose,

pride, and retention.

Partners and institutions see Brayton as a socially responsible operator that can support broader ESG and policy goals through its delivery.

### Communication impact

We report the social impact of our work through outcome stories, placement metrics, and impact case studies. Internally, we celebrate delivery teams that contribute to positive societal outcomes. Externally, we position Brayton Global as a partner of choice for organisations seeking both performance and purpose.

### Social Impact of Our Work – impact tracking framework

The following framework captures the tangible and qualitative outcomes of Brayton's work across clients, workforce, and society and is reported annually.

Category	Indicator	Metric Type	Data Source
Employment Outcomes	Number of job placements or consultant engagements enabled annually	Quantitative	HR / Operations placement records
Employment Outcomes	% of roles filled that meet criteria for decent work (e.g. fair pay, secure terms)	Quantitative	Contract & HR compliance audits
Skills Development & Inclusion	% of placed consultants accessing learning or development opportunities	Quantitative	Learning access data / consultant surveys
Skills Development & Inclusion	% of placements from underrepresented or marginalised backgrounds	Quantitative	Recruitment pipeline analytics
Public Sector & Client Impact	Number of public or social value-focused projects supported (e.g. health, education, justice)	Quantitative	Project delivery records
Public Sector & Client Impact	Client-reported improvement in end-user outcomes linked to Brayton-delivered roles	Qualitative	Client satisfaction surveys or reports
Partnerships & Ecosystem Engagement	Number of collaborative initiatives with educational institutions, NGOs, or public entities	Quantitative	Partnership records / MoUs
Partnerships & Ecosystem Engagement	Participation in joint social impact projects or ESG frameworks with clients	Qualitative	Client ESG engagement documentation
Equity & Access	% of assignments delivered in regions or sectors with known access or equity gaps	Quantitative	Assignment database / regional analysis
Equity & Access	Social outcome case studies or testimonials collected	Qualitative	CSR team / marketing
Narrative & Awareness	Mentions of social impact in external communication and stakeholder feedback	Qualitative	Communications team, stakeholder surveys





# Diversity & Inclusion

## A diverse & inclusive team

### MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



5, 8, 10

### Commitment

At Brayton Global, diversity and inclusion are not standalone initiatives—they are embedded in how we hire, lead, and deliver results across Europe. As a professional services firm reliant on human expertise, the diversity of our workforce shapes how effectively we understand client needs, manage complexity, and operate across borders. We recognise that equitable access to work, leadership, and development opportunities is a competitive advantage and a moral imperative.

Our commitment to inclusion focuses on three business priorities: ensuring unbiased recruitment and progression, building inclusive working environments, and increasing representation across functions and geographies. We actively seek talent from underrepresented backgrounds, apply structured hiring practices to reduce bias, and support all employees with equitable access to learning and career advancement. D&I also extends into our partnerships—with expectations for suppliers and contractors to adhere to non-discrimination and inclusive labour practices.

This approach supports:

- SDG 5 (Gender Equality) by promoting gender

equity in leadership roles, pay, and access to training.

- SDG 8 (Decent Work and Economic Growth) through inclusive employment, safe work environments, and fair treatment across our operations.
- SDG 10 (Reduced Inequalities) by addressing systemic barriers to participation for minority, migrant, and disadvantaged groups.

### How this helps our Stakeholders, Communication, and People

Clients increasingly expect suppliers to reflect their own D&I values. Brayton's approach strengthens client confidence and supports ESG-based procurement goals.

Employees thrive in inclusive environments where they can bring their whole selves to work, access growth pathways, and feel represented.

Candidates from diverse backgrounds see Brayton as an equitable and modern employer, which expands our access to top talent.

Partners and suppliers are held to inclusive

standards, reinforcing our ecosystem-wide commitment to fair work and equal opportunity.

### Communication impact

Brayton Global communicates D&I commitments internally via leadership messaging, hiring transparency, and regular data insights. Externally, we report progress on representation, promotion, and engagement, and share stories of lived experience to support accountability and cultural change. D&I is not about targets alone—it is about embedding fairness and belonging into every aspect of how Brayton operates.

### Diversity & Inclusion impact tracking framework

Below is a tailored framework for capturing and reporting D&I performance annually.

Category	Indicator	Metric type	Data source
Workforce Representation	% of employees by gender, ethnicity, and nationality (overall and by role level)	Quantitative	HR system and reporting dashboards
Workforce Representation	Year-on-year change in underrepresented groups in leadership	Quantitative	HR analytics reports
Recruitment & Hiring	% of hires from underrepresented groups	Quantitative	Recruitment system (ATS)
Recruitment & Hiring	Diversity of candidate shortlists (gender, ethnicity, etc.)	Quantitative	Recruitment tracking sheets
Career Progression	% of promotions by demographic group	Quantitative	HR promotion data
Career Progression	Internal mobility or access to development opportunities by group	Quantitative	L&D records
Workplace Inclusion	% of employees who feel included (survey results)	Quantitative (Survey)	Employee engagement survey
Workplace Inclusion	Reported incidents or concerns related to discrimination or bias	Quantitative	HR incident log or whistleblower reports
Supplier & Partner Inclusion	% of suppliers signing non-discrimination & inclusion clause	Quantitative	Supplier contracts
Supplier & Partner Inclusion	Spend with diverse or inclusive suppliers	Quantitative	Finance/procurement system
Training & Awareness	% of staff completing D&I training	Quantitative	Training system or LMS
Training & Awareness	D&I topics integrated into onboarding and leadership development	Qualitative	Onboarding & L&D content
Policy & Governance	Existence and review of inclusive recruitment and promotion policies	Qualitative	Policy documents and annual HR review





# Environmental impact

## Reducing travel and event related emissions

### MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



11, 12, 13

### Commitment

As a technology-driven service provider, Brayton Global acknowledges that its environmental footprint—though not industrial—carries material responsibility in a digitally intensive and globally connected economy. Our environmental impact arises primarily from energy consumption in offices and data infrastructure, business travel, IT equipment use, and our supplier value chain. While our direct emissions may be low, our influence is significant in shaping sustainable practices across our operations, partnerships, and client engagements.

We are committed to embedding environmental responsibility into our core business model. This includes optimising energy usage in our facilities, selecting lower-emission transport options, extending the lifecycle of IT equipment, and choosing suppliers who align with circular economy and climate-positive principles. We take a pragmatic, systems-thinking approach—integrating environmental considerations into procurement, remote working policies, and event planning. As digital services expand globally, we aim to be part of the solution: reducing avoidable emissions, adopting greener technologies, and

supporting our clients in achieving their sustainability goals.

This commitment supports:

- SDG 11 (Sustainable Cities and Communities) by promoting low-impact workplace and mobility models that reduce congestion and emissions in urban environments.
- SDG 12 (Responsible Consumption and Production) through responsible office operations, sustainable procurement, and electronic waste reduction.
- SDG 13 (Climate Action) by contributing to emissions reduction and climate resilience in the professional services sector.

### How this helps our Stakeholders, Communication, and People

Clients increasingly favour suppliers who demonstrate environmental integrity and are aligned with their ESG procurement criteria. Brayton's environmental stewardship reinforces trust and eligibility in public and private tenders.

Employees want to work for companies that reflect

their values. Practical initiatives—such as reducing unnecessary travel, supporting green commuting, and responsible use of office space—enhance engagement and retention.

Partners and suppliers are encouraged to align with our expectations, extending the environmental impact of our business beyond our direct control.

Communities benefit from reduced pollution, resource efficiency, and support for a broader transition to climate-resilient service economies.

### Communication Impact

We communicate our environmental actions transparently—whether through internal awareness campaigns, supplier briefings, or client engagement. Our progress is measurable in operational policies (e.g. remote-first by design), office management (e.g. low-energy equipment and waste segregation), and project choices (e.g. carbon-conscious travel). This positions Brayton Global as a service company that takes climate responsibility seriously, even in a low-emission sector—bridging the gap between digital growth and environmental sustainability.

### Environmental impact – impact tracking framework

Below is a tailored framework for capturing and reporting performance annually.

Category	Indicator	Metric Type	Data Source	Reporting Frequency
Carbon Emissions	Total Scope 1 and 2 emissions (CO <sub>2</sub> e) per year	Quantitative	Carbon audit / emissions reports	Annual
Carbon Emissions	% of operations powered by renewable energy	Quantitative	Utility bills / energy supplier records	Annual
Energy Use	Total energy consumed per office or project site (kWh)	Quantitative	Utility data / smart meters	Quarterly
Energy Use	Water consumption per office location (litres)	Quantitative	Water bills / facility management	Quarterly
Water & Resource Consumption	% of waste diverted from landfill (recycled or reused)	Quantitative	Facilities or waste vendor reporting	Quarterly
Water & Resource Consumption	Volume of electronic waste responsibly disposed or reused	Quantitative	IT asset disposal records	Annual
Waste Management	% of suppliers with environmental credentials (e.g. ISO 14001)	Quantitative	Procurement database / supplier due diligence	Annual
Waste Management	Spend on sustainable or low-impact products/services	Quantitative	Finance / procurement systems	Annual
Sustainable Procurement	% of staff participating in environmental initiatives or training	Quantitative	HR training logs / participation lists	Annual
Employee Engagement & Awareness	Sustainability awareness score from internal survey	Qualitative (Survey)	Internal employee engagement surveys	Annual





# Community Engagement

## Involvement in our communities

### MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



10, 11, 17

### Commitment

Brayton Global views community engagement not as charity, but as a strategic extension of our role in fostering inclusive digital economies. As a business specialising in workforce solutions and IT services, our core impact lies in empowering people through access to meaningful work, future-oriented skills, and inclusive participation in the knowledge economy. We engage with communities where our people live and work—particularly in underserved regions and cities where digital transformation is both a challenge and an opportunity.

Our community efforts are focused on enabling social mobility through partnerships with educational institutions, grassroots tech networks, and non-profits. We support initiatives that promote digital literacy, vocational readiness, and equitable access to the tech sector for underrepresented groups. Where possible, we align our hiring, mentoring, and upskilling programmes with these community investments, creating shared value for individuals and our business. We also encourage our teams to contribute time and expertise through volunteering, project-based engagement, and

civic tech initiatives.

This commitment supports:

- SDG 10 (Reduced Inequalities) by promoting access to opportunity, especially for those excluded from mainstream employment or digital training pathways.
- SDG 11 (Sustainable Cities and Communities) by engaging with local stakeholders to support inclusive economic development and human-centred digital growth.
- SDG 17 (Partnerships for the Goals) through collaboration with education providers, NGOs, and municipalities to align skills, work, and innovation at community level.

### How this helps our Stakeholders, Communication, and People

Communities benefit from improved access to technology careers and economic opportunity, contributing to resilience and social inclusion.

Clients gain from Brayton's embeddedness in local ecosystems, which enhances reputational capital and supports responsible procurement goals.

Employees are empowered to give back through structured volunteering, mentoring, or community-driven innovation, increasing engagement and purpose.

Partners are encouraged to co-invest in impact-driven programmes, reinforcing shared social commitments across our ecosystem.

### Communication impact

Brayton communicates its community efforts through storytelling, impact metrics, and stakeholder partnerships. We prioritise transparency by publishing case studies, tracking engagement outcomes, and co-creating programmes with local actors. This reinforces our identity as a purpose-led business—connecting professional opportunity with social impact, and anchoring our commercial success in the long-term health of the communities we serve.

### Community engagement impact tracking framework

Below is a tailored framework for capturing and reporting performance annually.

Category	Indicator	Metric type	Data source
Engagement Scope	Number of community initiatives supported	Quantitative	Internal CSR logs
Engagement Scope	Number of locations/countries engaged	Quantitative	Project reports
Beneficiary Reach	Total individuals impacted (e.g. trained, mentored, employed)	Quantitative	Partner NGOs, internal HR
Beneficiary Reach	% from underrepresented or disadvantaged groups	Quantitative	Partner feedback, DEI records
Employee Involvement	Number of staff participating in community programmes	Quantitative	HR/CSR team
Employee Involvement	Total volunteering hours contributed	Quantitative	Volunteer platform or time logs
Partnerships & Collaboration	Number of active partnerships with NGOs, schools, tech communities	Quantitative	CSR records, partnership MoUs
Partnerships & Collaboration	Type of engagement (e.g. funding, mentoring, co-delivery, infrastructure)	Qualitative	Partnership records
Outcomes & Results	Notable outcomes achieved (e.g. jobs created, digital literacy improved)	Qualitative & Case-Based	Partner feedback, testimonials
Outcomes & Results	Case studies collected for storytelling purposes	Qualitative	CSR/Marketing
Alignment to SDGs	SDG focus per initiative (mapped to 10, 11, 17)	Qualitative	CSR/Strategy team
Feedback & Learning	Beneficiary and partner satisfaction	Qualitative (Survey)	Feedback forms
Feedback & Learning	Internal lessons learned and improvement actions	Qualitative	CSR team reflection sessions



# Ethical Procurement

Adherence: social & environmental standards

## MATERIAL TOPIC

The planning and provision of IT services to enable industry investment, business growth, trade and job creation



8, 10, 12

## Commitment

At Brayton Global, procurement is not solely a commercial activity—it is a lever for responsible business conduct, risk management, and inclusive growth. Our procurement decisions shape who we do business with, how value is created, and what social and environmental standards we reinforce in our supply chain. As a provider of IT services and staffing solutions across Europe, we rely on a diverse network of subcontractors, independent consultants, and service providers. This makes ethical procurement a business-critical issue, not just a compliance exercise.

We are committed to embedding fairness, transparency, and accountability into all procurement processes. This means applying consistent criteria when selecting suppliers, ensuring they uphold labour rights, respect anti-discrimination principles, and comply with environmental and data protection regulations. We seek to create equitable access to opportunities by encouraging participation from small and minority-owned businesses, local service providers, and suppliers in emerging markets. Ethical procurement also supports operational continuity—by reducing exposure to reputational,

legal, and delivery risks associated with poor supply chain practices.

This commitment supports:

- SDG 8 (Decent Work and Economic Growth) by ensuring that all suppliers adhere to fair labour standards, safe working conditions, and employment equity.
- SDG 10 (Reduced Inequalities) through inclusive sourcing practices that provide access to underrepresented or disadvantaged groups in the procurement ecosystem.
- SDG 12 (Responsible Consumption and Production) by enforcing sustainability standards across our supplier network and promoting resource-efficient, low-impact procurement decisions.

### How this helps our Stakeholders, Communication, and People

Clients gain confidence that Brayton operates with integrity across its supply chain, reducing ESG risk in complex, multi-party service delivery.

Suppliers benefit from clear expectations, fair

terms, and the opportunity to align with international best practices in ethics and sustainability.

Employees are better equipped to make procurement decisions that reflect company values, supported by clear policies and governance mechanisms.

Communities and economies benefit when Brayton's purchasing power supports responsible businesses, economic inclusion, and decent working conditions.

## Communication impact

We communicate our procurement standards through published supplier codes of conduct, pre-engagement due diligence, and contractual obligations. Internally, procurement and project teams are trained to apply ESG criteria consistently. Externally, Brayton will report on supplier performance, diversity of spend, and any corrective actions taken—demonstrating that ethical procurement is both measurable and enforceable. This reinforces Brayton Global's credibility as a values-led business partner committed to shared prosperity and supply chain resilience.

## Ethical procurement impact tracking framework

Below is a tailored framework for capturing and reporting performance annually.

Category	Indicator	Metric type	Data source
Supplier Oversight	Number of active suppliers assessed for ESG compliance	Quantitative	Supplier audit reports
Supplier Oversight	% of contracts with ESG clauses (labour, environment, data protection)	Quantitative	Contract database
Inclusion & Diversity	% of procurement spend with diverse or local suppliers	Quantitative	Finance/Procurement system
Inclusion & Diversity	Number of outreach initiatives to underrepresented supplier groups	Quantitative	Supplier engagement records
Labour & Human Rights	% of suppliers complying with fair labour practices	Quantitative	Supplier self-assessments
Labour & Human Rights	Number of flagged non-compliance issues resolved	Quantitative	Compliance logs
Environmental Practices	% of suppliers with environmental policies or certifications	Quantitative	Supplier documentation
Environmental Practices	Inclusion of sustainability criteria in supplier selection	Qualitative	Tender evaluation records
Governance & Ethics	% of suppliers signing Code of Conduct or equivalent	Quantitative	Signed supplier agreements
Governance & Ethics	Number of procurement staff trained on ethical sourcing	Quantitative	Training logs
Performance & Improvement	Corrective actions initiated based on supplier assessments	Quantitative	Procurement reviews
Stakeholder Communication	Transparency of procurement practices (published metrics, case studies)	Qualitative	CSR/Procurement reports



**"There is no Plan B because  
there is no Planet B."**

**— Ban Ki-moon**



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