UK Hydrographic Office

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Version v2

Environmental, Social and Governance Policy POL033

Owner	Head of Sustainability
Approver	Director of Financial and Corporate Services

Document Security

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This document forms part of the UKHO's Quality Management System

Contents

1. Purpose

The UK Hydrographic Office (UKHO) is committed to integrating Environmental, Social and Governance (ESG) considerations into organisational decision-making, governance, risk management and operational delivery.

This policy establishes UKHO's strategic commitment to responsible environmental stewardship, positive social outcomes and effective governance. It provides the principles, expectations and accountability framework through which ESG considerations will be embedded across the organisation.

This policy supports delivery of UKHO's corporate objectives and aligns with relevant government requirements, Ministry of Defence policy, the Greening Government Commitments and other applicable environmental, social and governance obligations.

2. Scope

This policy applies to all UKHO activities, including operational delivery, business planning, procurement, partnerships, programmes, projects, products and services.

The policy applies to all UKHO employees and to individuals undertaking work on behalf of UKHO where relevant and proportionate to their role and contractual arrangements.

Compliance with this policy is expected unless exceptional operational circumstances require alternative action. In such circumstances, decisions shall be taken through appropriate governance arrangements and in accordance with applicable UKHO and MOD requirements.

Note:

- This policy shall remain in effect under all circumstances, except in the event of an emergency where adherence to the policy would impede necessary action; in such cases, the business continuity committee shall determine and authorise any temporary suspension or deviation from the policy.

3. Policy Detail

3.1 What is ESG?

Environmental, Social and Governance (ESG) is a framework used to understand how organisations manage environmental impacts, social responsibilities and governance arrangements. ESG supports organisations in identifying risks, opportunities and dependencies that may affect long-term organisational resilience and performance.

- **Environmental**: Environmental considerations relate to how UKHO interacts with and impacts the natural environment. This includes greenhouse gas emissions, energy consumption, resource efficiency, waste management, biodiversity and climate resilience.
- **Social**: The social component considers how an organisation interacts with customers, suppliers, communities and wider society. This includes areas such as human rights, ethical business practices, social value, responsible supply chains, accessibility, stakeholder engagement and the wider societal impacts of organisational activities.
- **Governance**: The governance component considers how an organisation is directed, managed and held accountable. This includes areas such as leadership, decision-making, ethics, transparency, risk management, assurance and compliance.

While ESG is often used interchangeably with "sustainability," the two terms are distinct. **Sustainability** is a broader concept or philosophy that encompasses the long-term viability of an organisation or system in environmental, social, and economic terms. **ESG**, in contrast, provides a measurable, disclosure driven framework that organisations use to operationalise and report on sustainability. ESG focuses more directly on how organisations identify risks, create opportunities, and demonstrate performance and accountability to stakeholders.

3.2 Why ESG matters to UKHO:

UKHO operates within a complex environmental, social and economic system. Decisions taken by UKHO can influence not only organisational performance but also outcomes across customers, suppliers, communities and the wider maritime sector.

3.3 Application of this Policy

This policy establishes the principles, governance arrangements and accountabilities through which environmental, social and governance considerations will be integrated into organisational activities.

Compliance with this policy will be demonstrated through the application of its principles within relevant governance, decision-making, planning, procurement, risk management and operational processes.

Progress against specific ESG objectives, targets and improvement activities will be monitored through supporting strategies, delivery plans, management systems and performance reporting arrangements.

3.2 ESG Objectives, Targets and Improvement Activities

Specific ESG objectives, targets and improvement activities shall be established, monitored and reviewed through supporting strategies, delivery plans, management systems and governance processes.

Environmental objectives and targets shall be managed through the Environmental Management System (EMS) in accordance with ISO 14001 requirements. Progress against ESG priorities shall be reported through appropriate governance and performance reporting arrangements.

4. Policy Statement

4.1. Policy Statement

UKHO is committed to integrating ESG considerations into strategic planning, business planning and operational decision-making. ESG considerations shall be incorporated into relevant organisational activities where proportionate and appropriate.

4.2 Integrating ESG into Decision-Making

UKHO shall identify, assess and manage material environmental, social and governance risks and opportunities through established governance, risk management and assurance processes.

5. Supporting Environmental Sustainability

UKHO shall seek to minimise adverse environmental impacts arising from its activities and support the transition towards a resilient and sustainable operating model.

5.1 Delivering Positive Social Outcomes

UKHO shall promote a safe, inclusive and supportive working environment and seek opportunities to generate positive social value through its operations, partnerships and supply chain activities.

5.2 Maintaining Effective Governance

UKHO shall maintain transparent, accountable and ethical governance arrangements that support responsible decision-making and compliance with applicable legal, regulatory and departmental requirements.

5.3 Continual Improvement

UKHO shall continually improve its ESG performance, capability and maturity through monitoring, review, learning and adaptation.

6. Governance and Accountability

The governance arrangements described below may be fulfilled through existing governance bodies or equivalent governance mechanisms as determined by the Executive Leadership Team (ELT).

6.1 Accountable Person

In accordance with JSP816 and associated Ministry of Defence requirements, The Director of Finance and Corporate Services is the designated Accountable Person for environmental protection matters and retains overall accountability for ensuring that appropriate governance arrangements exist to support environmental compliance and performance.

6.2 Executive Leadership Team

The Executive Leadership Team (ELT) provides strategic oversight of ESG-related risks, opportunities, priorities and organisational performance. ELT may establish or delegate responsibilities to appropriate governance groups to support implementation of this policy.

6.3 Head of Sustainability

The Head of Sustainability is responsible for coordinating implementation of this policy, providing strategic advice on ESG-related matters, monitoring organisational ESG performance and supporting the development of governance arrangements, strategies and improvement activities

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6.4 Environmental Management System Governance

Appropriate governance arrangements shall be maintained to oversee environmental compliance, environmental performance, environmental risk management and continual improvement of the Environmental Management System.

6.5 Climate Adaptation and Resilience Governance

Appropriate governance arrangements shall be maintained to oversee climate-related risks, opportunities, adaptation activities and organisational resilience planning.

6.6 Supply Chain Sustainability Governance

Appropriate governance arrangements shall be maintained to oversee supply chain sustainability, supplier-related ESG risks and opportunities, social value delivery and supply chain decarbonisation activities.

6.7 Managers

Managers are responsible for ensuring that ESG considerations are appropriately reflected within their areas of responsibility, supporting compliance with this policy and identifying material ESG risks and opportunities relevant to their activities.

6.8 All UKHO Personnel

All personnel are responsible for complying with this policy and fulfilling the expectations set out in Section 6.9.

6.9 Policy Expectations

All personnel are expected to:

- Comply with applicable legal, regulatory, departmental and organisational requirements relating to environmental, social and governance matters.

- Consider relevant ESG risks, opportunities and impacts when undertaking activities, making decisions or developing proposals within the scope of their role.

• Escalate material ESG-related risks, incidents, concerns or non-compliance through appropriate management and governance channels.

• Support the achievement of organisational ESG objectives and continual improvement activities where relevant to their responsibilities.

• Complete any ESG-related awareness, guidance or training activities required for their role.

7. Policy Adherence and Assurance

7.1 Compliance with this Policy

All UKHO personnel, contractors and individuals working on behalf of UKHO are expected to comply with this policy.

7.2 Monitoring and Assurance

Compliance shall be monitored through established governance, assurance and management arrangements, including environmental management processes, risk management processes, internal assurance activities and performance reporting mechanisms.

This policy shall be reviewed periodically to ensure continued relevance, effectiveness and alignment with organisational objectives, government requirements and emerging ESG expectations.

7.3 Non-compliance

Instances of material non-compliance with this policy shall be reported to the Head of Sustainability and the relevant accountable individual responsible for the affected activity, function, or decision. Significant issues shall be escalated through appropriate management and governance channels as required. Where non-compliance presents a significant organisational, legal, environmental, or reputational risk, the matter shall be escalated to the Director of Finance and Corporate Services. Appropriate corrective actions shall be identified, implemented, and monitored where necessary.

7.4 Exceptions and Dispensations

Requests for a temporary deviation from this policy shall be supported by a documented rationale and considered on a case-by-case basis.

Exceptions may only be approved where there is a clear operational, legal, security, safety, or organisational justification and where the associated risks have been appropriately assessed.

All exceptions shall be approved by the Director of Finance and Corporate Services following consultation with the Head of Sustainability. Approved exceptions shall be documented, time bound and subject to periodic review.

8. Document Hierarchy

This policy establishes the governance principles, accountabilities, and expectations for ESG across UKHO.

The current Sustainability Roadmap sets the long-term direction, priorities, and objectives for ESG. Supporting delivery plans, Environmental Management System (EMS) documentation and improvement programmes define the specific actions, targets, measures, and activities required to implement the strategy and support continual improvement.

Together, these documents provide a coherent framework for managing ESG-related risks, opportunities, and performance across the organisation.

9. ESG Principles

The principles set out below are intended to support and inform decision-making across UKHO. They are not intended to create additional standalone approval requirements or mandatory documentation. The application of these principles should be proportionate to the nature, scale and significance of the decision being considered and should be integrated within existing governance, business planning, risk management, procurement, and investment processes where appropriate.

ESG Principle	Policy Statement	Application
Systems Thinking	UKHO recognises that organisational decisions can	Where reasonably practicable, decisions should consider wider

ESG Principle	Policy Statement	Application
	create impacts beyond their immediate purpose.	environmental, social, and economic effects, including potential upstream, downstream, unintended, and inter-related consequences.
Long-Term Stewardship	UKHO shall seek to balance short-term operational requirements with long-term organisational resilience and sustainability.	Decision-making should consider future risks, opportunities and dependencies that may affect UKHO, its stakeholders, and the wider operating environment.
Evidence-Based Decision Making	ESG-related decisions should be informed by proportionate evidence, data, analysis, and professional judgement.	Where uncertainty exists, decision-makers should consider potential risks, assumptions, and trade-offs as part of the decision-making process.
Transparency and Accountability	UKHO is committed to maintaining transparent and accountable governance arrangements.	Material ESG decisions, risks and performance information should be subject to appropriate oversight, scrutiny, and reporting.
Resilience and Adaptation	UKHO shall seek to strengthen organisational resilience to environmental, social, economic, and technological change.	Consideration should be given to how decisions support the organisation's ability to anticipate, withstand, and adapt to future challenges.
Sustainable Value Creation	UKHO recognises that effective ESG management can contribute to organisational performance, innovation, capability development, and public value.	Where appropriate, UKHO should seek opportunities to deliver environmental, social, and organisational benefits alongside core business objectives.

10. Definitions

Term	Definition
Environmental, Social and Governance (ESG)	A framework used to assess and manage organisational risks, opportunities and performance relating to environmental sustainability, social responsibility, and governance.
Sustainability	The long-term stewardship of environmental, social, and economic systems in a manner that supports resilience, wellbeing, and future prosperity.
Environmental Management System (EMS)	The framework used by UKHO to identify, manage, monitor and continually improve environmental performance.
Social Value	The wider economic, social, and environmental benefits generated through organisational activities beyond the direct delivery of goods or services.
Climate Adaptation	Actions taken to prepare for, respond to and build resilience against the actual or anticipated impacts of climate change.
Resilience	The ability of an organisation to anticipate, prepare for, respond to, and recover from disruption while maintaining core functions and objectives.
Material ESG Risk	An environmental, social or governance risk that could significantly affect organisational performance, compliance, reputation, operations, or stakeholders.
Accountable Person	The individual formally designated with overall responsibility for environmental protection and compliance in accordance with applicable MOD requirements.

11. Document Control History

Version	Summary of change	Reviewer	Date	Approver
0.1	Policy draft	Director of Financial and Corporate Services	n/a	n/a
0.2	Policy draft	EMS board	n/a	n/a
0.3	Policy draft	CAWG working group	n/a	n/a
0.4 - 0.5	Replies to comments within policy, policy updates from feedback	Head of Sustainability	n/a	n/a
1.0	Feedback incorporated	Head of Sustainability	n/a	n/a
2.0	Final approval of the policy	Head of Sustainability	11 June 2026	Director of Financial and Corporate Services