

tower

ESG

Report


2023



# Introduction

In today's rapidly evolving and interconnected global landscape, the importance of corporate responsibility and sustainable business practices cannot be overstated. Recognising this, Tower Leasing Ltd is proud to present its inaugural Environmental, Social, and Governance (ESG) Report. Our commitment to leading our sector in ESG standards reflects our dedication to not only the financial growth of our stakeholders but also to the wellbeing of the communities we serve, the health of our planet, and the governance structures that ensure our consistent ethical operations.

Since its inception, Tower Leasing Ltd, a leader in the UK's equipment leasing and business finance industry, has always believed in the power of business as a force for good. As we continue to support businesses across the UK with financial solutions that empower their growth, we also understand the ripple effect of our operations on the broader socio-economic and environmental milieu.



**This report aims to showcase our ongoing efforts, accomplishments, and areas of improvement in our ESG commitments.**

We understand that the journey towards a more sustainable and responsible business model is a continuous one. Thus, this report is not just a reflection of what we have achieved, but a testament to our promise for the future. We invite our stakeholders, partners, and the broader community to join us on this journey, provide feedback, and collaborate as we strive to set new benchmarks in ESG performance in the equipment leasing and finance sector.

# About Tower Leasing

Tower Leasing is a funder with the support of brokerage facilities which enable companies across the UK to acquire much needed capital equipment through leasing. We create the opportunity for businesses to manage their cashflow whilst being able to secure the latest assets and technology, enabling our customers to stay competitive within their markets. Our services also provide the capability to deliver additional funding to support your business growth with our wide range of finance solutions.

## Activities

Tower Leasing operates through multiple operations, which it defines as distinct business units or divisions that provide equipment leasing and asset finance solutions. There are ten operations within the organisation (compliance, IT, sales, underwriting, account management, payouts, accounts, customer service, end of lease and collections). Each operation focuses on serving multiple industries within the Asset Finance market.

## Products and Services

Tower Leasing provided a number of products or services during the

reporting period. These include leasing options for a wide range of equipment, such as IT and technology equipment, medical devices, construction machinery, and vehicles. The organisation does not sell products or services that are banned in any markets or subject to significant stakeholder concerns or public debates.

Tower Leasing ensures compliance with relevant regulations and standards to address any potential concerns. Our products and services include Minimum Term Rental Agreements; Fixed Term Rental Agreements; Operating

Leases; Business Loans; Managed Service Agreements (MSA); The Recovery Loan Scheme (RLS); and the Coronavirus Business Interruption Loan Scheme (CBILS)

## Markets Served

Tower Leasing primarily serves the United Kingdom market, offering its products and services to businesses across various geographic locations within the UK. Our clients include businesses from diverse industries, including healthcare, construction, technology, manufacturing, and transportation.



The organisation does not limit its services based on demographic characteristics, but rather focuses on serving businesses of all sizes, ranging from small and medium-sized enterprises (SMEs) to larger corporations. Tower Leasing considers the size and relative importance of the markets it serves, which can be indicated by net sales and revenues generated from these markets.

For Tower Leasing, the term **"significant locations of operation"** refers to the geographical areas where the company conducts substantial business activities or has a significant presence. It is where

Tower Leasing operates offices, facilities, or has a significant customer base. The significant location of operation for Tower Leasing is The Columbia Centre, 2nd Floor, Station Road, Bracknell, Berkshire, RG12 1LP.

# To Our Stakeholders

## **Our Journey Ahead With Tower Leasing**

At Tower Leasing, our sustainability vision is deeply rooted in our steadfast commitment to customer service, unmatched expertise, and unwavering integrity.



# To Our Stakeholders

---

For years, these cornerstone values have been our North Star, helping us navigate the changing landscapes of business and the economy.

As we pave the way forward, our emphasis on sustainability is shaped by (1) cultivating understanding, (2) fostering unity, and (3) judiciously acting. Our goal is not just to address present-day challenges, but to be forward-thinkers, ensuring a brighter tomorrow for everyone – while always staying true to the aspirations of our stakeholders.

Cultivating understanding means delving deep into the nuances of what sustainability means for Tower Leasing in the long term. In our

efforts, we undertook a comprehensive assessment in 2022. Collaborating with external experts, we identified the post-pandemic shifts surrounding environmental, social, and governance aspects. This analysis, contextualised with industry dynamics and community needs, yielded a roadmap, laying the groundwork for action plans in the coming years. Our expertise is continually enhanced by aligning with leading sustainability benchmarks like the Global Reporting Initiative (GRI), active participation in industry consortia, and unwavering dialogue with our stakeholders, amplifying our commitment.

Strong governance creates a

blueprint for risk mitigation and amplifying value for everyone involved with Tower Leasing. In the recent past, we've streamlined our governance frameworks to keep a sharp focus on sustainability topics throughout our operation.

Lastly, it's paramount to strike a balance in our actions, considering our diverse and multifaceted stakeholders. Although their expectations may vary, our mission remains steadfast: to tread the path of ambiguity with clarity, always upholding our pledge to fostering better financial futures and elevating UK businesses.

---

## Stakeholder Mapping and Engagement

We value the input and perspectives of our stakeholders, including employees, customers, suppliers, and funders. Through surveys, interviews, consultations, and regular interactions, we gather insights to assess their effectiveness in addressing stakeholder concerns and managing our organisation's impacts.

The highest governance body engages with stakeholders, such as the ESG Committee, to support these processes by actively seeking their input, feedback, and insights.

They recognise the importance of engaging with stakeholders to understand their expectations, concerns, and perspectives related to the organisation's economic, environmental, and social impacts. By fostering open and transparent communication, the highest governance body establishes a collaborative approach that enables the identification of key issues and the development of effective mitigation strategies.

Through stakeholder engagement, the highest governance body gains valuable insights into the diverse perspectives and interests of various stakeholders, including employees,

customers, suppliers, local communities, and investors.

## The Categories of Stakeholders

Tower Leasing places a high value on its relationships with various stakeholders. We are committed to engaging with a broad range of stakeholders. The main categories of stakeholders we engage with include:

### 1. Employees

Identified as a primary stakeholder due to their integral role in the company's operations.

### 2. Customers

Identified through their engagement

with our services, customers are a critical stakeholder group, as their satisfaction directly influences our business success.

### 3. Business Partners & Suppliers

Identified through our supply chain and partnership networks, these stakeholders are key to ensuring our service quality and delivery.

### 4. Regulatory Bodies

Identified based on our legal and industry obligations, these stakeholders oversee our compliance with laws, regulations, and industry standards.

### 5. Community and Society

Identified as those impacted by our operations or residing in communities

where we operate.

### 6. Shareholders and Investors

Identified as a primary stakeholder due to their integral role in Tower Leasing's funding and operations.

These stakeholders are identified based on their interest in our operations, their influence on our business, and the potential impact our business might have on them. Engagement with these stakeholders helps us understand their expectations, gain valuable feedback, and align our operations with the broader expectations of society.



## The Purpose of the Stakeholder Engagement

The purpose of Tower Leasing's stakeholder engagement is multi-faceted:

### 1. Understanding and Responding to Stakeholder Needs

By engaging with our stakeholders, we can better understand their needs, concerns, and expectations. This allows us to align our operations and strategies with these expectations, ensuring we deliver a service that meets the needs of our stakeholders and upholds our commitment to responsible business conduct.

### 2. Building Trust and Enhancing Reputation

Regular and transparent engagement with our stakeholders helps us to build trust, enhance our reputation, and strengthen our relationships. This is vital for our long-term sustainability and success.

### 3. Risk Management

Engagement helps us to identify potential risks and issues early, allowing us to address them proactively. This includes risks related to our operations, compliance, reputation, and sustainability, for example in materiality assessment.

### 4. Continual Improvement

Stakeholder feedback is a valuable resource for driving continual improvement in our operations, policies, and procedures. It helps us to identify opportunities for innovation, efficiency, and better business practices.

### 5. Promoting Transparency

Open dialogue with stakeholders promotes transparency, demonstrating our commitment to ethical business practices, accountability, and corporate responsibility.

### 6. Compliance

Engagement with regulatory stakeholders ensures we stay abreast of legal and regulatory changes, maintain compliance, and uphold our industry standards.

In essence, our stakeholder engagement seeks to foster a collaborative, open, and responsive environment that benefits our stakeholders, our business, and the broader society.

---

# Material Topics

## Material assessment Process

At Tower Leasing, we align our materiality assessment process in accordance with the Global Reporting Initiative (GRI standard) and follow a structured approach to identifying our actual and potential impacts on the economy, environment, and people, including their human rights.

Tower Leasing has a robust policy in place for seeking external assurance to ensure transparency and accountability. The highest governance body, along with senior executives led by Kerry Howells (CEO), actively participate in the

process including materiality assessment. They engage external experts from Version28 (ESG consulting firm) to conduct thorough assessments of the company's sustainability practices, ESG reporting, and adherence to industry standards. The involvement of the highest governance body and senior executives demonstrates their commitment to upholding responsible business practices and obtaining objective validation of the company's sustainability efforts.



1 Compliance with Laws & Regulations				
2 Ethical & Lawful Behaviour				
3 Effective, Accountable & Transparent Governance				
4 Transparency on Products, Services and Pricing				
5 Customer privacy, Handling of Data and Data Security				
6 Sustainable Business Strategies				
7 Economic Performance				
8 Human Capital Development				
9 Employment Practices				
10 Labour Conditions & Environmental Impact in the Supply Chain				
11 Environmental Investments				
12 General and Special Waste Management				
13 GHG Emissions				

## The Process Includes:

**1. Impact Assessments:** As per the GRI guidelines, we undertake internal economic, environmental, social, and human rights impact assessments. These assessments allow us to evaluate our business operations, processes, and services for any negative or positive impacts.

**2. Grievance Mechanisms:** We have a robust grievance mechanism in place to capture concerns related to our operations, employee wellbeing, and other issues. This mechanism serves as a crucial tool for identifying actual or potential adverse impacts and is a

source of direct feedback from our stakeholders.

**3. External Information:** We leverage data and insights from external sources and experts, industry reports, and peer benchmarks to identify industry trends and potential areas of impact.

**4. Scope of Impact Identification:** Our scope for identifying impacts is broad, encompassing both short-term and long-term impacts. We believe that to truly understand the extent of our impact, it is essential to look beyond immediate effects and consider the long-term implications of our activities.

### 5. Inclusion of Business

**Relationships:** We do not exclude any part of our value chain when identifying impacts. This includes our direct operations as well as our relationships with suppliers, contractors, and partners.

**6. Governance Role:** In line with Disclosure 2-12 of GRI's General Disclosures 2021, our highest governance body plays a pivotal role in overseeing our due diligence processes and the identification of impacts. They ensure our commitments to responsible business practices are met and that we uphold our ethical standards

### 7. Limitations and Exclusions:

While we strive to be comprehensive in our impact identification, we acknowledge that there may be limitations due to resource constraints, data availability, and other factors. We are continually working to improve our impact assessment processes to overcome these limitations.

Through these steps, we ensure a comprehensive understanding of our impacts, guide our strategic decisions, and reinforce our commitment to responsible business conduct. Our process is transparent, inclusive, and aligned with the best practices laid out by GRI.

# Governance and Economic Impact

Strong governance systems are the cornerstone of a successful, sustainable organisation and help us to live and implement our mission, the overarching guidelines that ensure that the company is a force for good for business, society, and the planet.



# The Governance Structure

Our highest governance body is the Board of Directors, which is responsible for setting strategic direction, monitoring performance, and ensuring compliance with applicable laws and regulations. The Board is comprised of experienced professionals with diverse backgrounds and expertise relevant to our industry.

The board is responsible for decision-making and overseeing the management of our organisation's impacts on the economy, environment, and people.

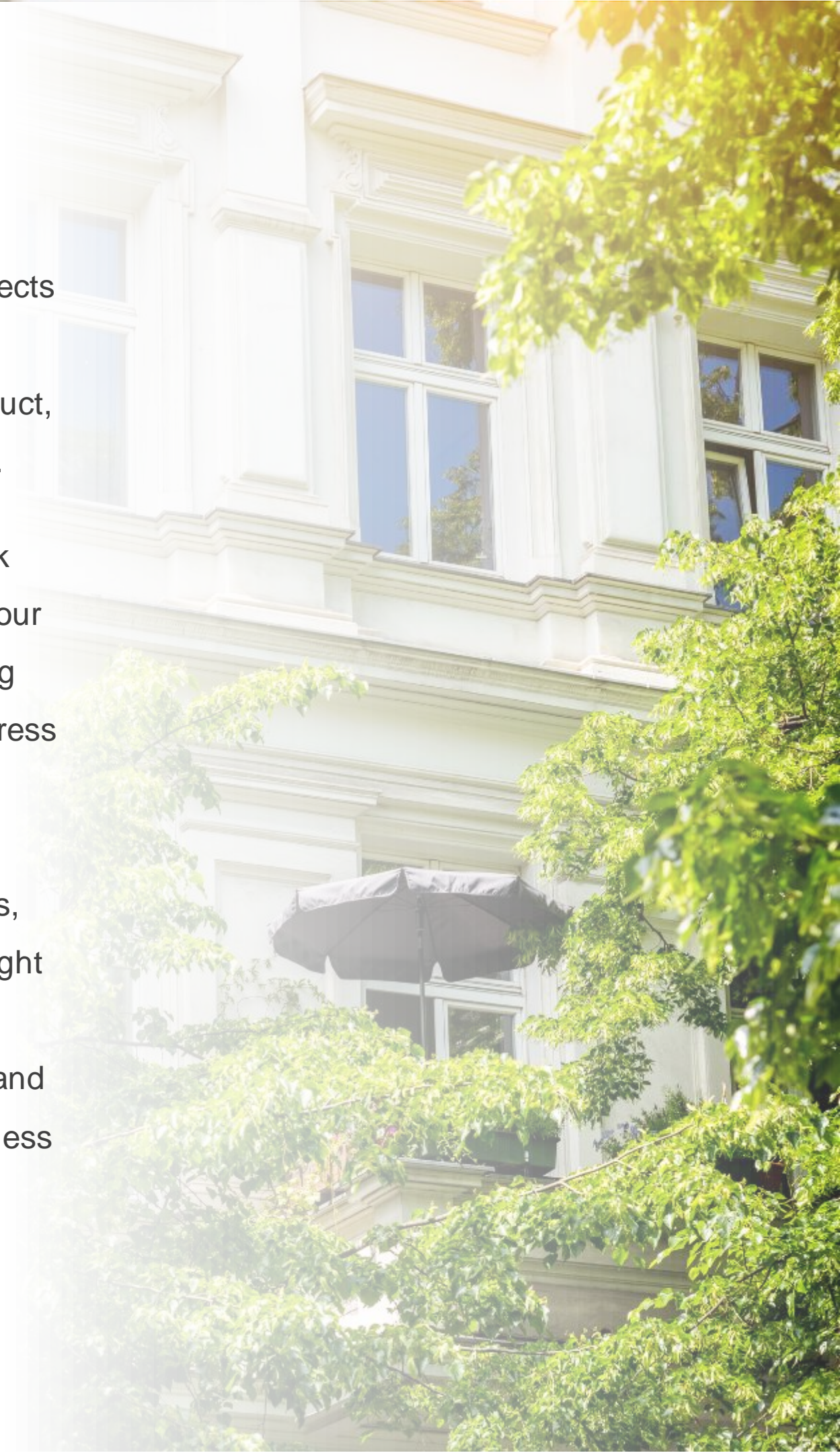
To support its functioning, the board has established several department heads, including Compliance who covers sustainability, Ethics, Risk Management and Compliance. These department heads play a vital role in overseeing specific areas of governance, such as financial reporting, executive compensation, and board composition. They meet regularly to review and discuss relevant matters, provide recommendations to the board, and ensure accountability and transparency in our operations.

Our governance structure reflects our commitment to sound decision-making, ethical conduct, and stakeholder engagement.

These department heads work collaboratively to ensure that our organisation's decision-making processes considers and address the impacts on the economy, environment, and people.

They provide valuable insights, recommendations, and oversight to support the organisation in achieving its ESG objectives and maintaining responsible business practices.

---



## Board of Directors

<b>Toby Franklyn</b> Owner	<b>Adam Barron</b> Owner	<b>Kerry Howells</b> Chief Executive Officer	<b>Ian Welham</b> Operations Director
-------------------------------	-----------------------------	---	--

## Management

<b>Kerry Howells</b> Chief Executive Officer	<b>Tim Knight</b> Business Change Manager & Data Protection Officer	<b>Simon Gunn</b> Head of Finance	<b>Ian Welham</b> Operations Director	<b>Matthew Sturney</b> Head of Sales	<b>Sam Harris</b> IT & Facilities Manager	<b>Cheri Quelch</b> Customer Service and EOL Manager
---	--	--------------------------------------	--	---	--	---

## Role of the Highest Governance Body in Sustainability Reporting

The highest governance body of Tower Leasing is responsible for reviewing and approving the reported information, including the organisation's material topics. The process involves the following steps:

### 1. Report Preparation:

The ESG Committee within Tower Leasing compile the necessary information and data related to the organisation's material topics. This includes financial performance, environmental impact, social

initiatives, stakeholder engagement, and other key sustainability indicators.

### 2. Internal Review:

The collected information undergoes an internal review process. This involves a thorough examination of the data, ensuring accuracy, consistency, and compliance with reporting standards and guidelines.

### 3. Governance Body Review:

The internal review is presented to the board of directors and ESG Committee responsible for sustainability oversight. The governance body reviews the information to assess the organisation's performance, identify

areas of improvement, and validate the material topics presented.

### 4. Discussion and Feedback:

The governance body engages in discussions with the ESG Committee, seeking clarification, requesting additional information, or providing feedback. This exchange allows for a comprehensive understanding of the reported information and ensures that it aligns with the organisation's goals, values, and stakeholders' expectations

### 5. Approval and Endorsement:

Following the review and discussion, the highest governance body approves and endorses the reported information. This signifies their

acceptance and validation of the material topics and the overall accuracy and reliability of the report.

### 6. External Assurance:

Tower Leasing also engages with external assurance provided by ESG specialist consulting firm Version28, to verify and validate the reported information. This independent verification adds credibility and transparency to the report, providing stakeholders with confidence in the organisation's sustainability performance.

## Direct Economic Value Generated and Distributed

Our value added is defined as the economic value created by the activities of our business and its employees. This value is distributed to our operating costs including the supply chain, employees through wages and benefits, providers of capital and governments.

Tower Leasing's direct economic value generated revenues of **£13,421,351 GBP**

Economic value is distributed to stakeholders through operating costs, employee wages and benefits, payments to providers of capitals and taxes.

Tower Leasing prefers to source from local suppliers (defined as suppliers who are based in the same country as the Tower Leasing's head office). This is reflected in the fact that 100% of investments and spendings, by value, was purchased locally in 2022.

This local sourcing policy has a significant contribution to the direct economic value we create in the local economies





## Financial Implications and Other Risks and Opportunities Due To Climate Change

The scale of the climate crisis is more visible than ever, and the effects of climate change threaten people, business operations and economies around the world. Looking ahead, we are already acutely aware of the issues at stake.

### Risks Associated with Climate Change

**1. Physical Impacts:** The risk of physical impacts, such as extreme weather events, rising sea levels, and changing temperatures, can lead to

property damage, disruptions in operations, and increased costs for repairs and resilience measures. It is classified as a physical risk.

**2. Regulatory Changes:** The risk of regulatory changes, including stricter emission standards, carbon pricing, and sustainability reporting requirements, can result in increased compliance costs, penalties for non-compliance, and potential changes in operational practices. It is classified as a regulatory risk.

**3. Supply Chain Disruptions:** The risk of supply chain disruptions due to climate-related events, such as crop failures, water scarcity, or transportation disruptions. These disruptions can impact the

availability and cost of raw materials, potentially affecting production and revenue. It is classified as another (operational) risk.

### Opportunities Associated with Climate Change

**1. Green Technologies and Services :** The opportunity to capitalise on the growing demand for green technologies and services, such as renewable energy solutions, energy-efficient equipment, and sustainable transportation options. This can lead to revenue growth and market expansion. It is classified as another (business) opportunity.

**2. Energy Cost Savings:** The opportunity to reduce energy

consumption and operational costs by implementing energy efficiency measures, adopting renewable energy sources, and optimising resource use. This can result in long-term cost savings and improved financial performance. It is classified as another (financial) opportunity.

**3. Changes in societal attitudes and customer behaviour towards climate change:** As businesses become increasingly aware of their environmental footprint, the demand for green, energy-efficient products is growing. This changing market dynamics opens up opportunities for us to expand our portfolio of sustainable offerings.

## The Methods Used to Manage the Risk or Opportunity

To effectively manage the risks and opportunities associated with climate change, Tower Leasing is implementing the following methods:

### 1. **Green Portfolio Expansion:**

We aim to actively expand our leasing portfolio to include energy-efficient and low-carbon technologies. By offering environmentally friendly products and equipment, we help our clients transition to more sustainable operations and reduce their carbon footprint.

### 2. **Enhanced Risk Assessment:**

We have integrated climate change considerations into our risk assessment and management processes. This allows us to identify, understand, and mitigate potential climate-related risks effectively. We continuously monitor and review our risk exposure to ensure proactive risk management.

### 3. **Engagement with Stakeholders:**

We engage with our clients, suppliers, and regulators to understand evolving climate-related expectations and collaborate on effective responses. By actively participating in industry discussions, we stay informed about emerging best practices, regulations,

and technological advancements related to climate change.

### 4. **Sustainability Reporting:**

Tower Leasing is committed to transparent sustainability reporting. Through regular reporting, we communicate our progress and commitment to managing climate-related risks and capturing opportunities. This allows our stakeholders to understand our environmental performance and our efforts towards sustainability.

### 5. **Collaboration and Partnerships:**

We actively seek partnerships and collaborations with organisations, industry associations, and experts working in the field of climate change.

By sharing knowledge, expertise, and best practices, we enhance our capacity to manage climate-related risks and seize opportunities.

By employing these methods, Tower Leasing aims to mitigate climate-related risks, capitalise on opportunities, and align our operations with the transition to a low-carbon economy. We recognise the importance of proactive and sustainable practices to ensure the long-term success and resilience of our business.

---

# Environment Impact

Tower Leasing's Environment Footprint



# Emissions

Tower Leasing acknowledges its environmental footprint, recognising the importance of transparency and accountability in today's sustainability landscape. We have undertaken extensive efforts to quantify and assess our environmental impact, and the data we present serves as a foundational starting point for our ongoing commitment to responsible practices. While we have diligently strived for accuracy and

completeness in our environmental reporting, it's essential to note that this data represents our best efforts in understanding our footprint.

We are fully committed to continuous improvement and will refine our measurements, methodologies, and initiatives as we work towards a more sustainable future.

This is the first year of Tower Leasing's reporting. This will be the base line year for future targets and comparison. Therefore, there's no emissions reduction made yet.

Based on the calculation and analysis of the base year, future target of reduction of GHG emissions will be set for the next reporting year.

## GHG emissions total - scope1+2+3=36,595.6 tons Co2

**Scope 1** direct GHG emissions (operations)

**3.6 Metric tons Co2**

**Scope 2** energy indirect GHG emissions (energy supply)

**3.5 Metric tons Co2**

**Scope 3** Other indirect GHG emissions - **36,588.5 Metric tons Co2**

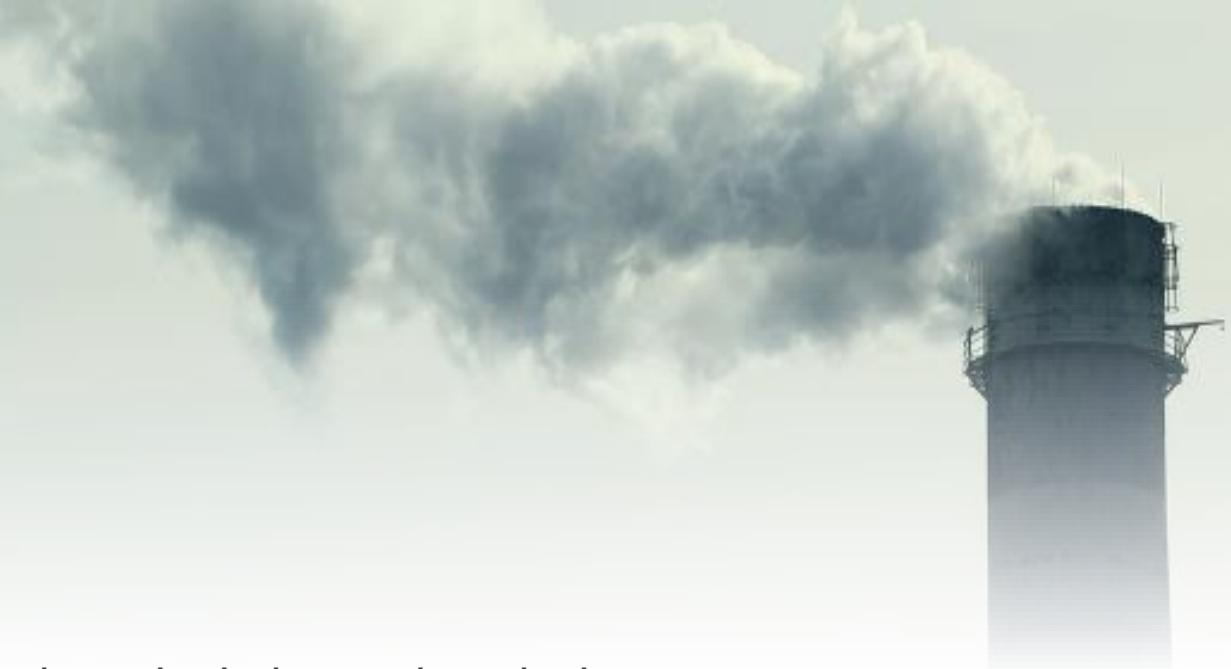
**Purchased goods and services** - 1,448.4 Metric tons Co2

**Business Travel and hotels** - 23.5 Metric tons Co2

**Employee commuting** - 283.3 Metric tons Co2

**Leased assets (downstream)** - 34,833.3 Metric tons Co2

Tower Leasing's GHG emissions intensity ratio (GHG emissions (kg) per GBP revenue generated for 2023): 2.73 kg Co2/GBP



# Waste Management

## Waste Generation and Significant Waste-Related Impacts

We are fully committed to continuous improvement and will refine our measurements, methodologies, and initiatives as we work towards a more sustainable future.

### Inputs:

#### Materials and Resources:

Our operations require various resources, including office supplies, electronic equipment, and consumables. The extraction, production, and transportation of these inputs can generate waste along the supply chain.

### Activities:

#### Operations and Maintenance:

Our day-to-day operations, including office activities, facility maintenance, can generate waste. This includes paper waste, electronic waste, and other by-products from our operations.

#### Recycling and Waste Management:

While we strive to implement effective waste management practices, the process of recycling and waste disposal itself can have associated environmental impacts, particularly if not managed properly.

### Outputs:

**Solid Waste:** Our operations can generate solid waste such as paper and cardboard, packaging materials, office supplies, and other non-hazardous waste. Proper waste segregation and disposal methods are essential to minimise the impact of these outputs.

**Electronic Waste:** As a technology-driven organisation, we may generate electronic waste from outdated or non-functional electronic equipment. Proper handling and recycling of electronic waste is crucial to prevent environmental contamination.

**Hazardous Waste:** Our operations generate minimum hazardous waste, only applies to products such as batteries, or other materials that require special handling and disposal in compliance with relevant regulations and best practices.

## Management of Significant Waste-Related Impacts

Tower Leasing is committed to taking actions to prevent waste generation, both within its own activities and throughout its value chain. We recognise the importance of adopting circularity measures and implementing sustainable waste management practices. We have taken the following actions to prevent waste generation and manage significant impacts from waste:

### Within Tower Leasing's Own Activities:

#### Waste Reduction Programs:

We have implemented waste reduction programs within our facilities to minimize waste generation. This includes implementing lean manufacturing principles, optimising production processes to minimize material waste, and promoting recycling and reuse initiatives. For example, we also promote paperless office.

#### Material Substitution:

We seek opportunities to substitute stationary materials with more

sustainable alternatives that generate less waste. This involves exploring environmentally friendly materials that have a reduced impact on waste generation throughout their lifecycle.

#### Employee Engagement and Training:

We provide regular training and awareness programmes to our employees and promote waste reduction practices to encourage responsible waste management behaviours. Our employees are encouraged to identify opportunities for waste prevention and provide suggestions for improvement.

## Recycling and Waste Management Partnerships:

We collaborate with recycling and waste management partners to ensure that waste generated from our operations is managed effectively. This includes proper sorting, recycling, and disposal of waste materials, in compliance with applicable regulations and industry best practices.

By implementing these actions and collaborating with stakeholders throughout our value chain, Tower Leasing strives to prevent waste generation, promote circularity, and effectively manage significant waste-related impacts.

**Disclosure 306 – 3**  
Waste Generated

**78%**

Waste Directed To Disposal



**22%**  
Waste Diverted from Disposal

Solid Waste	0.09 Metric Ton (Mt)
Electronic Waste	0.11 Metric Ton (Mt)
Hazardous Waste	0 Metric Ton (Mt)
<b>Weight Amount</b>	
<b>Total</b>	<b>0.2 Metric Ton (Mt)</b>

**Table 306-4-a** Total weight of waste diverted from disposal in metric tons, and a breakdown of total by composition of the waste – Breakdown by composition.

Breakdown By Composition	Waste Composition	Amount
	Solid Waste	45 Kilogram (Kg)
	Electronic Waste	0 Kilogram (Kg)
	Hazardous Waste	0 Kilogram (Kg)

This indicator measures the total quantity of waste that is not directly related to the daily operations but is categorised as one-off waste.

Examples of waste in this category are waste materials coming from demolition or remediation activities or waste or raw materials following an unusual incident e.g. a fire

Environmental performance calculator methodology

Consolidation approach for emissions: Operational Control  
Calculation is based on BEIS data, the UK Government's Green Gas Reporting Conversion Factor and GHG Protocol standards Scope 3 emission evaluator database.



# Social Impact



## Employment Practices

Tower Leasing's main office is in Bracknell, UK and a small satellite office in Essex.

Tower Leasing prides itself on having an equal gender split between all employees which shows we are committed to equality and diversity.

Equal gender splits have a positive effects on morale and productivity due to bring different perspectives and experiences to the table, which can lead to new ideas and solutions.

Our vision is to foster a sense of belonging within our workforce, ensuring all our employees experience a rich journey of becoming fulfilled and passionate professionals with us, getting access to a world of meaningful development opportunities.

96% of Tower Leasing's employees are permanent staff while only 4% are temporary. Tower leasing believe that permanent placements offer staff a greater sense of job security. Employees know that they will have a job for the foreseeable future, which can give them peace of mind and

allow them to focus on their work.

Permanent staff typically receive more benefits than temps, such as health insurance, paid time off, and retirement plans. These benefits can be a valuable part of an employee's compensation package. Permanent staff have more opportunities for career growth than temps. They can take on new challenges, responsibilities, and can be promoted within the company. Permanent staff feel a greater sense of belonging to the company than temps. They are more likely to be involved in company activities and to feel like they are part of a team. Permanent staff can

provide stability to the workplace. They are more likely to be familiar with the company's culture and procedures, and they can help to train new employees. The needs of the business and the specific requirements of certain positions to call for temporary workers but in general , Tower's workforce is made up of permanent employees.

Tower Leasing does recognise that there is a gender imbalance with regards to our part time employees but there are many reasons why this might be the case, and it is not due to discrimination.

The majority of Tower Leasing's part time workers were originally full-time but requested a reduction in hours following maternity leave.

Tower Leasing have therefore not offered the role as part-time but instead made accommodations for existing staff whose circumstances have changed.

As a result, these members of staff are predominantly female. Should a new part-time role be created, Tower would look to consider all candidates, regardless of gender

**Employees by gender and contract type**

Gender		
	Male	Female
Total	25	25
Full Time	24	19
Part-Time	0	5
Temporary	1	1

The total number of workers who are not employees and whose work is controlled by Tower Leasing is minimal. Currently only two employees fall into this category. One is a temporary worker covering maternity leave for our customer service team; and the other works in the finance team on contract.





**New Employee Hires and Employee Turnover**

We have reinforced our inclusive hiring strategy to attract and hire the right people for the future. We aim to create more impactful and inclusive job advertisements to attract, engage and assess top-talent faster, in line with being a more balanced and inclusive company.

**Table 401-1-a** Total Number and rate of new employee hires during the reporting period, by age group, gender and region:

Gender	# Of New Employees	Rate of New Employees
Under 30 years	4	8%
30-50 years	6	12%
Over 50 years	1	2%

Gender	# Of New Employees	Rate of New Employees
Female	6	12%
Male	5	10%

**Table 401-2-a** Benefits are standard for full-time employees of the organisation but are not provided to temporary or part time employees, by significant locations of operation these include, as a minimum:

Location	Life Insurance	Health Care	Disability & Invalidity Coverage
Head Office, Bracknell, Berkshire	Yes	Yes	Yes

Parental Leave	Retirement Provision	Stock Ownership	Others
Yes	Yes	No	Yes

## Diversity and Equal Opportunity

Tower Leasing's approach to diversity and inclusion involves efforts to eliminate all discrimination and to give people from all backgrounds the chance to succeed. We seek to attract local talent and industry experts to support growth in all markets.

We embrace diversity throughout our organisation and recruit to build a representative and inclusive workforce. We implement policies and programmes that are consistent with promoting equal opportunities for everyone, without discrimination.

With our commitment to an empowered workforce comes our commitment that all employees are paid at least – and in most cases well above – the minimum salary stipulated by law or collective agreements.

We support women's empowerment and the associated economic growth and development of societies through compensation policies including the ratio of remuneration of women to men. The ratio of basic salary and remuneration of women to men 1/1 for equivalent roles and skill sets.

**Table 405-1-b** Percentage of employees per employee category in each of the following diversity categories

Employee Category	Gender	Percentage
Full Time Employees	Female	50%
Full Time Employees	Male	50%
Part Time Employees	Female	100%
Part Time Employees	Male	0%

**Table 405-1-a-i** Governance bodies in each of the diversity categories

Gender	Percentage
Male	75%
Female	25%
Diverse	0%

**Table 405-1-a-ii: Governance Body Age Group:** Under 30 years old, 30-50 years old, over 50 years old.

Age Group	Percentage
30-50 years	75%
Over 50 years	25%

Percentage of employees in each diversity category (age)		
Full Time Employee	Under 30 years	32%
Full Time Employee	30-50 years	48%
Full Time Employee	Over 50 years	20%
Part Time Employee	Under 30 years	33.5%
Part Time Employee	30-50 years	50%
Part Time Employee	Over 50 years	16.5%

We aim to assess and review the numbers of our workforce, particularly relating to gender and nationality, and will track progress in this regard, including the percentage of women and diverse groups in leadership positions.

Our Equality, Diversity and Inclusion Policy outlines our commitment to

ensuring a representative workforce that reflects the diverse communities in which we operate.

## Human Capital Development

At Tower Leasing, we are committed to supporting the professional growth and development of our employees through a range of programs and assistance aimed at enhancing their skills. The following are the types of programs we implement and highlight the assistance we provide:

### 1. Training and Development:

We offer comprehensive training programs designed to enhance the job-specific skills and knowledge of our employees. These programs cover various areas such as leasing industry practices, customer service, effective communication, sales

techniques, and leadership development.

### 2. Mentoring and Coaching:

We have established mentoring and coaching programs to provide guidance and support to our employees as they progress in their careers. Our experienced employees are paired with less-experienced colleagues to offer valuable advice and assistance.

### 3. Professional Certification

**Support:** We provide support to our employees in obtaining relevant professional certifications. This support may include financial assistance for certification fees, study materials, and dedicated time for studying.

#### 4. Skill Enhancement Workshops:

We organise workshops and seminars that focus on developing specific skills and knowledge areas crucial to our operations. These workshops cover topics such as financial analysis, risk management, technology advancements, and industry-specific trends.

#### 5. Educational Assistance Programs:

We offer educational assistance programs to employees who wish to pursue further education, such as degree programs, specialised courses, or professional qualifications. This support may include financial assistance and

study leave.

#### 6. Cross-Training and Job

**Rotation:** We encourage cross-training and job rotation opportunities to broaden our employees' skill sets and provide exposure to different areas of our organisation. This approach enables our employees to develop a diverse range of skills and enhances their flexibility and adaptability.

#### 7. Online Learning Platforms:

We provide access to online learning platforms and e-learning resources that offer a wide range of courses and educational materials. These platforms allow our employees to engage in self-paced learning and

acquire new skills or knowledge based on their individual interests.

**Table 405-1-b** Percentage of employees per employee category in each of the following diversity categories

	Gender	Average Hours of Training
	Female	36
	Male	36

# Customer Privacy



At Tower Leasing, safeguarding customer privacy is at the forefront of our Environmental, Social, and Governance (ESG) priorities. We consider the protection of customer data as not only a legal obligation but also a fundamental ethical responsibility. We are committed to upholding the highest standards of data security and confidentiality throughout our operations.

To ensure the privacy of our customers, we have implemented robust data protection measures, including stringent encryption protocols, regular security audits, and strict access controls. We are

dedicated to complying with all applicable data privacy regulations and standards in the regions where we operate. Additionally, we continually invest in employee training and awareness programs to foster a culture of data privacy consciousness within our organisation.

Furthermore, we engage in transparent communication with our customers about how their data is collected, used, and protected. We provide clear and accessible privacy policies, giving our clients the necessary information to make informed decisions regarding their personal information.

As part of our ESG commitment, we continuously assess and enhance our data privacy practices, leveraging emerging technologies and best practices to adapt to evolving threats and regulatory landscapes. Upholding customer privacy is not just a compliance matter but a cornerstone of our values, reflecting our dedication to ethical business practices and maintaining the trust of our valued clients.

Tower Leasing has identified 'ZERO' substantiated complaints concerning breaches of customer privacy during the reporting period.

# Our Next Steps – Key ESG targets

Tower Leasing is at the beginning of the ESG journey and will adopt a holistic approach to set and track E, S, and G targets and progress:

Environment Building a Sustainable Future		Social Helping Society To Thrive		Governance Leading By Example	
Climate Change and Energy	Circular Economy	Stakeholder and Community Engagement		Supply Chain	Sustain Finance
<ul style="list-style-type: none"> <li>Net Zero Emissions by 2050, including the value chain</li> <li>Reduce total greenhouse gas emissions by 10% over the next two years.</li> </ul>	<ul style="list-style-type: none"> <li>Reduce total solid and electronic waste by 15% + a higher recycling rate by the end of 2024.</li> </ul>	<ul style="list-style-type: none"> <li>Increase employee engagement scores by 15% by the end of 2024 through enhanced training and development programs</li> </ul>	<ul style="list-style-type: none"> <li>Implement a new community engagement program by 2024 supporting local community projects through volunteerism and donations</li> </ul>	<ul style="list-style-type: none"> <li>Increase percentage of new suppliers that are screened using social criteria</li> </ul>	<ul style="list-style-type: none"> <li>Increase % Green financing linked to sustainability over total financing by 2024</li> </ul>
% Scope 1+2 emissions reduction	% recycled waste	Employee satisfaction and engagement scores measured through annual surveys.	Number of volunteering hours per employee and total donations made to community projects annually.	% of new suppliers screened	% of sustainability-linked financing over total financing