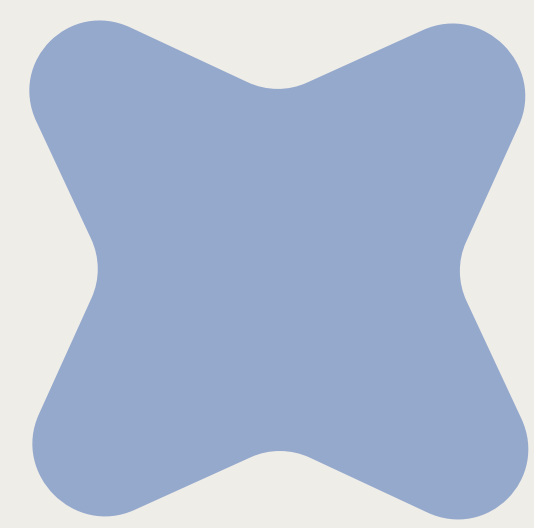
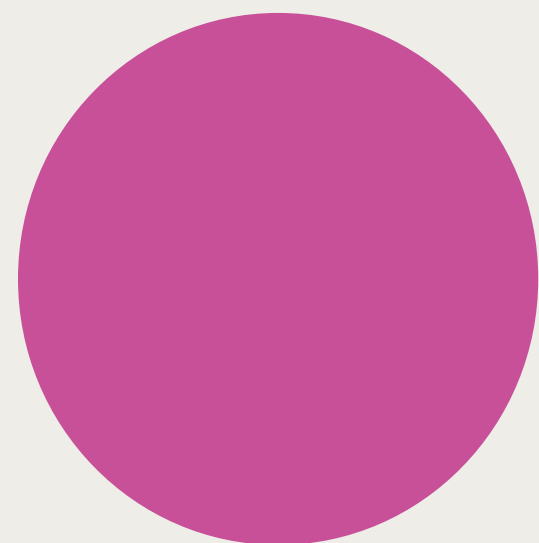
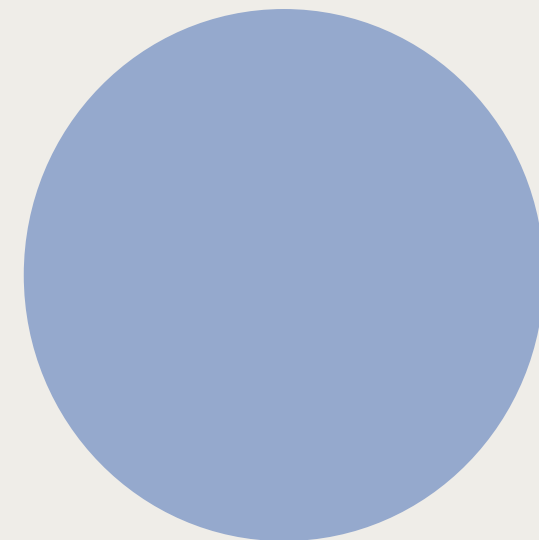
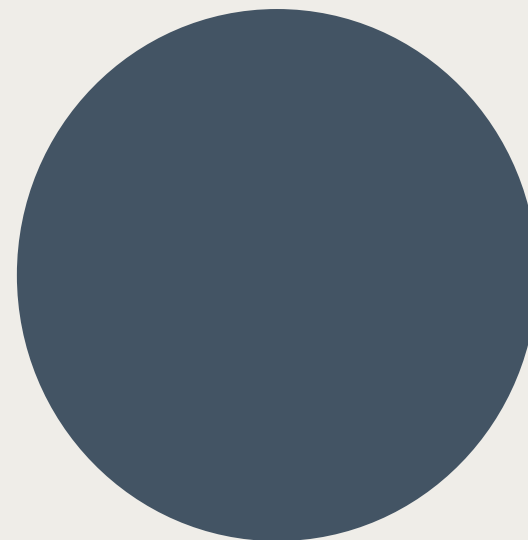
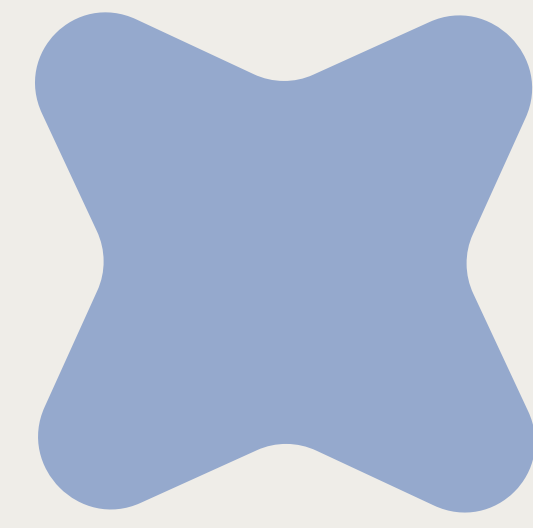


# Environmental, Social & Governance Report

May 2024



**Turley**

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Appendix 1: Glossary

# Introduction

We are trusted independent advisors with a restless ambition to shape a more sustainable future.

Our aim is to have a positive and lasting impact on the planet and communities through sustainable development, regeneration, our Charitable Trust and delivering social value.

We work collaboratively with our clients to deliver places and communities that thrive.

ESG is integral to our values, employee ownership, strategy, and decision-making. Environmental, Social and Governance (ESG) is a framework used to assess an organisation's business practices and performance on various sustainability and ethical issues. It also provides a way to measure business risks and opportunities in those areas.

Our approach to ESG drives positive impacts for our co-owners, the businesses with which we engage and the communities in which we serve.

Working with our leading UK and Ireland Sustainability & ESG team we have made significant progress in the identification of additional 'material' areas, under which we are strengthening our disclosures (public reporting of ESG targets and performance).

During 2023 our co-owners collaborated to input to the creation of our ESG strategy which was then launched in January 2024 (which will form part of our next reporting period).



Our ESG strategy is based on three principles which have been agreed with our Leadership Team and Company Directors.

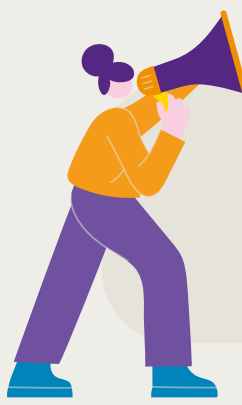
**1 Our employee-owned business will remain a force for good and we will maximise our positive impacts including:**



**Planet – the environment**



**People – our co-owners and clients**



**Places – the communities we serve**

**Profit** – we strive to be a commercial and profitable business. We make our own decisions about how we generate and manage our profit. This includes:

- Staying true to our values and applying our ethics framework in our projects and client relationships;
- Supporting charities and social value within the communities that we serve;
- Distributions to co-owners recognising contribution;
- Re-investment in the company; and
- Maintaining cash reserves to support business resilience.



**2** We support the achievement of the UNSDGs<sup>1</sup> through our work, projects, and carbon financing (through carbon neutrality).

**3** We are exploring B Corp certification<sup>2</sup> and considering joining the community of organisations who, like Turley, are purpose-driven.

**4** We expect all co-owners to apply these principles in their work.



<sup>1</sup> [sdgs.un.org/goals](https://sdgs.un.org/goals)

<sup>2</sup> To be part of the growing movement of B Corp certified organisations, contributing to an inclusive, equitable and regenerative economy. The process will involve making changes identified in an action plan, culminating in making a legal change to governance.



# Environmental

## Climate and Carbon

We have been CarbonNeutral® since 2018.

Our Beyond Carbon Neutral Group works with our leadership to implement initiatives which continually reduce our carbon footprint and support our progress to net zero by 2050 (if not before).

The Carbon Literacy Project aims to provide access to relevant climate change learning that catalyses action to reduce greenhouse gas emissions.

A Carbon Literate Organisation is an organisation that has been accredited by The Carbon Literacy Project as having a substantial commitment to Carbon Literacy.



We are currently pursuing Carbon Literacy training for our organisation and achieved our Bronze Carbon Literacy award in Summer 2023 with our Beyond Carbon Neutral Group and Leadership Team having completed Carbon Literacy training. We are now making plans to achieve the Silver award where over 30% of co-owners will have completed Carbon Literacy training. We will then offer the training to all co-owners in the company, this not only aims to help co-owners reduce the impact of Turley but to help them reduce their personal carbon footprint.

As a responsible employee-owned business, managing and minimising our environmental impacts is very important. We have voluntarily maintained our CarbonNeutral® company certification since 2018. Our greenhouse gas (GHG) emissions for the assessment period June 2022 – May 2023 are a total of 842.9 tCO<sub>2</sub>e (Scope 2 location-based) associated with our operations across 15 offices.

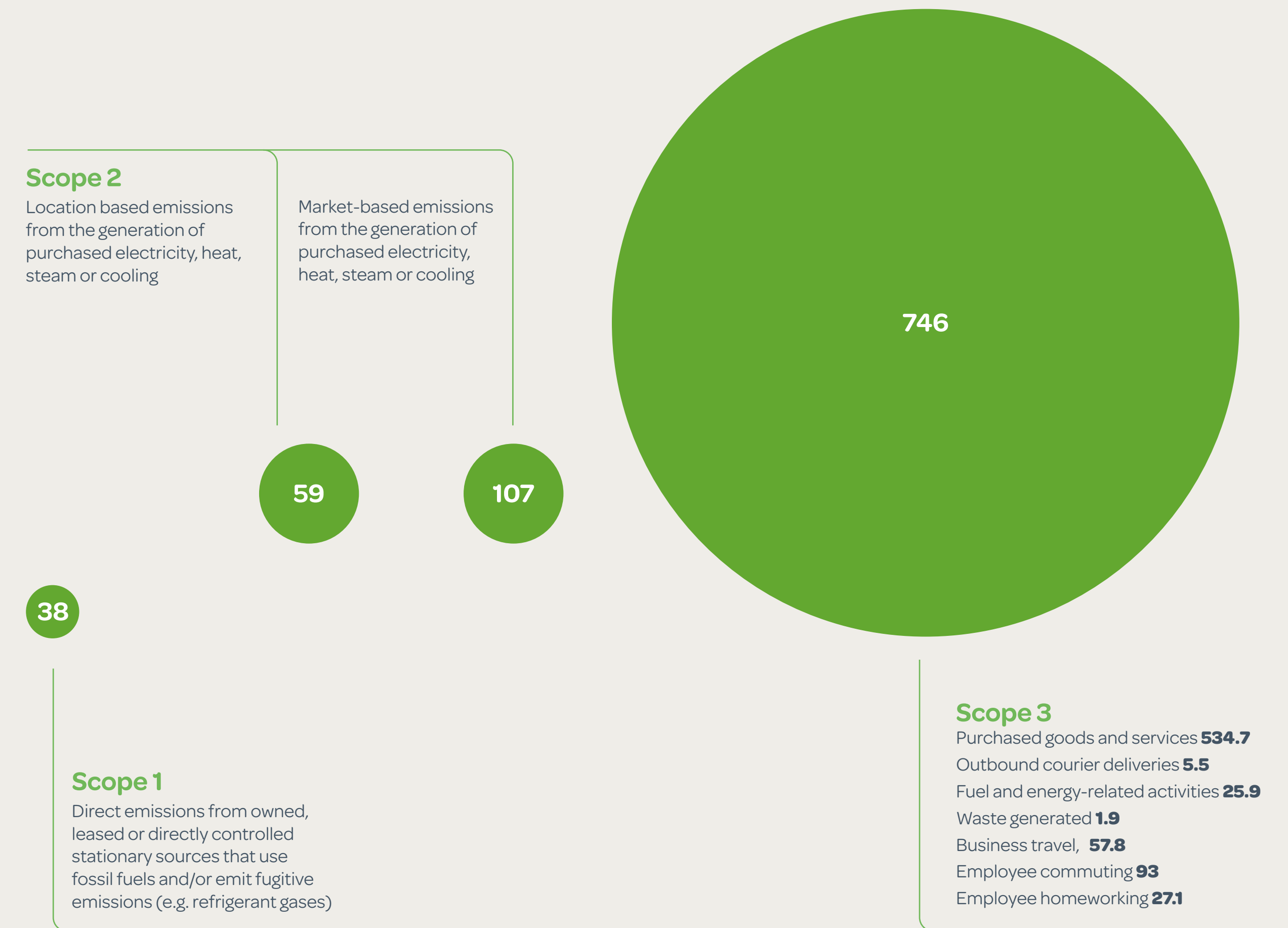
During this assessment period, we have enhanced our data collection procedures for Scope 3 emissions in particular, including using financial data where primary data is not readily available to estimate emissions associated with our procurement such as marketing & communications, entertainment, training, insurance, professional memberships, accountancy & legal etc.



As a result of this exercise, we have established a comprehensive and robust emissions inventory, albeit with higher total emissions compared to previous years due to these additional Scope 3 categories. The year-on-year increase in the coverage and accuracy of emissions is an important step in our journey to be a Net Zero organisation.

Despite this overall increase in emissions due to increased Scope 3 coverage, we have maintained a year-on-year reduction in our Scope 1 & 2 emissions in line with our validated near term SBTi (Science Based Target initiative) target for Net Zero Scope 1 & 2 by 2030. Our 2022-23 Scope 1 & 2 emissions (location-based approach) of 96.9 tCO<sub>2</sub>e reduced by 20 tonnes CO<sub>2</sub>e in comparison to 2021-22 (116.9 tCO<sub>2</sub>e).

## Emissions (tCO<sub>2</sub>e) by Source Category (2022-23)





## Resource use, responsible sourcing, waste and recycling

We regularly review our key suppliers' commitments to ESG.

In January 2023 we changed our IT asset disposal and recycling contractor to Stone. Stone provides sustainable services, and have achieved zero to landfill for the past 10 years.

By using a PIN printing system in our offices, which deletes unreleased prints after four hours, we have saved 31,000 sheets of paper and saved on energy and CO<sub>2</sub> costs.

All co-owners are equipped with a laptop and mobile phone allowing them to work from any location, including from home. This supports our flexible working policy, and minimises our need to travel.

Our UK-wide reprographics printing contract is with Hobs Repro. Hobs partners with PrintReleaf as part of their commitment to environmental sustainability. PrintReleaf leverages paper usage and equates the number of trees needed to reforest that usage on an equivalent basis.

DELL supplies all our company laptops. Dell is focused on driving positive impact for the planet and for its people through human inspiration and technology innovation. Reducing resource use and addressing growing concerns connected to e-waste and leveraging innovation tools are just some of their aims.

We employ the same checks and scrutiny in relation to our stationery suppliers.

Most of our company software is from Microsoft. They have been carbon neutral across the world since 2012 and commit to being carbon negative by 2030. Their goal is to promote sustainable development and low-carbon business practices.

EE supply all our company mobile phones. Their network and high street stores are powered using 100% renewable electricity. By 2025, 100% of their plastic packaging will be reusable, recyclable, compostable or removed.

Our offices are all serviced by local authority recycling. Our secure shredding contractor, Crown Records Management, recycles the remnants shredded.

“

In the period January to May 2023 we saved the equivalent of **19 tonnes** of carbon by IT recycling alone.





## Company Conference

Our biennial company conference ('CoCon') took place at the end of June 2022. A member of our Sustainability & ESG team was involved in the planning from the outset, and when choosing a venue we requested potential venues to complete a sustainability questionnaire and provide us with their sustainability policy. The De Vere Beaumont Estate in Windsor met all our needs, providing us with the ability to reconnect whilst also endorsing excellent sustainability measures. De Vere's sustainability information is available [here](#).

We also considered sustainability during the conference itself with the aim to reduce our environmental impact as far as possible. We reduced paper usage throughout the conference by 'going digital' and endorsed the venue's policy of reducing single use plastics by discouraging the use of plastic water bottles to help reduce waste and encouraging co-owners to bring along a reusable water bottle that they could refill at the venue.

Transport normally has the biggest environmental impact at company conferences, so we took a proactive approach to sustainable travel. Co-owners were encouraged to travel via train or coach, where feasible, and those driving by private car were encouraged to car share with other co-owners to minimise our transport impact. A group of co-owners also took part in a cycle from Turley's Birmingham office to Windsor raising money for our Charitable Trust ([see page 11](#)).



# Social

## Turley Charitable Trust

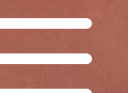
The Charitable Trust was formed in 2008 and exists to provide direction and oversight of our giving on behalf of co-owners.

The aim of the Trust is to support the relief of poverty and those in need. We are a registered charity and regulated by the Charity Commission. Our information is available [here](#).

Initiatives range from long-term financial and practical commitments to short-term donations to local charities associated with our offices. We support two national and 12 local charities.

During 2022-23 co-owners raised  
**£74,000** in total

The amount donated since the Charitable Trust was formed in 2008 is now **£1,160,000**.



# Highlights 2022-23

Turley's keen cyclists raised over £1,000 by cycling from Birmingham to our company conference venue in Windsor. This was split between Upcycle, who we provide free bikes, cycle training and bicycle maintenance workshops for young people; and Step Out, who support children and young people through outdoor based mentoring.

The Trust also donated a total of £12,000 split between the following causes: FoodCycle; Magic Breakfast; The Jack Hazeldine foundation; Buddys Line; and Enable Ireland.

We supported Movember, the Big Sleep out, the Land Aid 10k and many other events nationally.

Internationally we supported the following causes: the DEC appeal for flooding in Pakistan; Médecins Sans Frontières; the DEC appeal for Ukraine; Home Leone; and Transform Salone.

There are five Trustees who administer the Trust, these are:



**Alison Browne**  
Chair



**Olivia Carr**



**Lindsay Hart**



**Chloe Patel**



**Paul White**





We support numerous National and Local charitable organisations.

### National charities

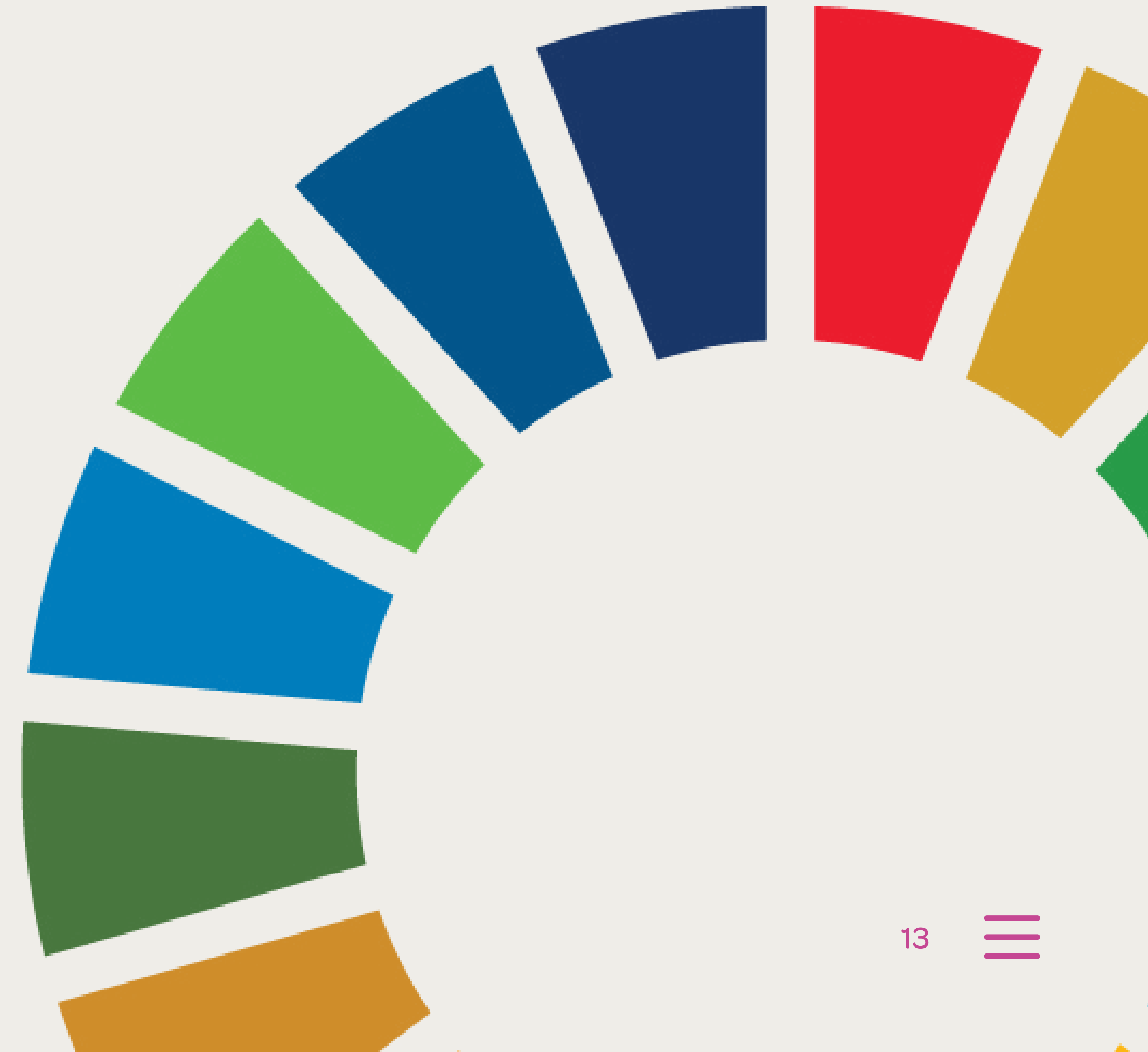
### Local charities





## The UN Sustainable Development Goals (UNSDGs)

We continue to align our materiality reporting to the UNSDGs. We also link these to the aims of the Charitable Trust, such as the alleviation of poverty.



## Pro bono work

As one of our partner charities, LandAid actively campaigns to facilitate pro bono opportunities by acting as a nationwide broker, matching up property professionals with charities. The Charitable Trust has given a commitment to LandAid to consider and undertake appropriate pro bono work.

We also carry out pro bono work for other relevant charities, including the advice we provide to the Ethical Property Foundation. Our skills and services are matched to a wide range of charities and social enterprises with a social mission, and we provide support and help on relevant opportunities, as required. We have also worked with Barnardos this year, as part of a project for St Modwen.

We offer advice to the Ethical Property Trust and have contributed to their online FAQ manual. This can be accessed [here](#).

## LandAid ambassadors

We have a LandAid ambassador in our London office and encourage others to get involved too. The LandAid Ambassador Programme gives our co-owners the chance to volunteer time and skills for an important cause and be part of a network committed to making change happen.

“

Being a LandAid Ambassador makes real difference to the lives of young people who are homeless.



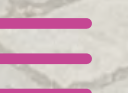
## Supporting our clients

Recently the Charitable Trust has donated to the charity fundraising efforts of the following clients: St Modwen, Bloor Homes, Redrow, Buccleuch Property, Jansons, Awcock and Ward Partnerships.

## Volunteering

Our co-owners often take part in volunteering projects within their local communities. Examples include:

- Co-owners from the Birmingham office volunteered at Trentham Gardens including assisting in ground maintenance.
- Co-owners from the London office volunteered at Spitalfields's City Farm, located in one of the most densely populated wards of Tower Hamlets. They work with a vibrant and multi-cultural community to provide educational opportunities for children and adults.
- Bristol and Cardiff Office co-owners volunteered at Amelia Trusts Farm who provide therapeutic support to disadvantaged and vulnerable people.





# Equity, diversity and inclusion

## Catalyst for change programme

Equity, Diversity and Inclusion is at the heart of our company business strategy and is a commitment from our leadership.

Our leadership appreciates the benefits of even more diverse decision-making, the value of different perspectives, thoughts, and contributions which prompted us to take further steps to accelerate change.

In particular, we have a responsibility to our co-ownership and company sustainability (in addition to the benefits to client relationships, recruitment and retention) to diversify our leadership and decision-making.

We are pleased to be making progress which supports greater inclusion, diversity and achievement of our strategic and operational goals:

- **our EDI plan;**
- **implementing greater gender balance to our Company Director group with effect from December 2021;**
- **continuing our sponsorship programme;**
- **introducing a reverse mentoring programme; and**
- **we have broadened the scope for Senior Director and Business Leader roles which includes distributed leadership and deeper delegation.**



We have invested in diversifying leadership perspectives and experiences alongside the implementation of our ongoing EDI plan.

We implemented the following steps to take place over an initial 12-24 month period:

- Engaged two external I & D Strategic Advisors (non-exec style roles) to participate in all leadership meetings and welcome their inputs to our discussions and decision-making. We were pleased to welcome [Sharon Amesu](#) and [Toby Mildon](#) into these roles.
- Invited a member of Embrace to participate in all leadership meetings and welcome their inputs to our decision-making.
- Engaged a third Strategic Advisor role, Michele Steel, a senior individual from the built environment. A helpful role model/mentor to co-owners.





# EMBRACE

## Inclusive Business

Our internal realiser group 'Embrace' champions an equitable workplace representative of all sections of society where each co-owner feels respected and able to be their authentic self at work.

There are 10 pillars of focus for Embrace, each with a sponsoring Senior Director:

- Gender Mainstreaming
- LGBTQ+
- BAME communities
- Wellbeing and resilience, including mental health
- Social mobility
- Neurodiversity
- Promoting gender equity, close our gender pay gap
- Broaden diversity in leadership and decision-making
- Women's health
- Driving inclusive business processes

We continue to learn from and support Real Estate Balance (REB); Stonewall; PREACH Inclusion; Women in Property; and Women in Planning.

In 2022/23 we mentored six young people aged 16-18 through Career Ready and provided valuable and rewarding work experiences to six young people from diverse communities through our work with 10,000 Interns, Career Ready and the Mayor's Fund for London.



# Gender pay gap

In April 2023, we published our data externally on the government and our own website (relating to 2021-2022).

Our gender pay gap reduced by 2% from 2020-2021 to 2021-2022. We will continue our efforts to support co-owner development and to further reduce the gap.

Our pay gap information can be viewed [here](#).



## Wellbeing and resilience

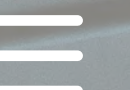
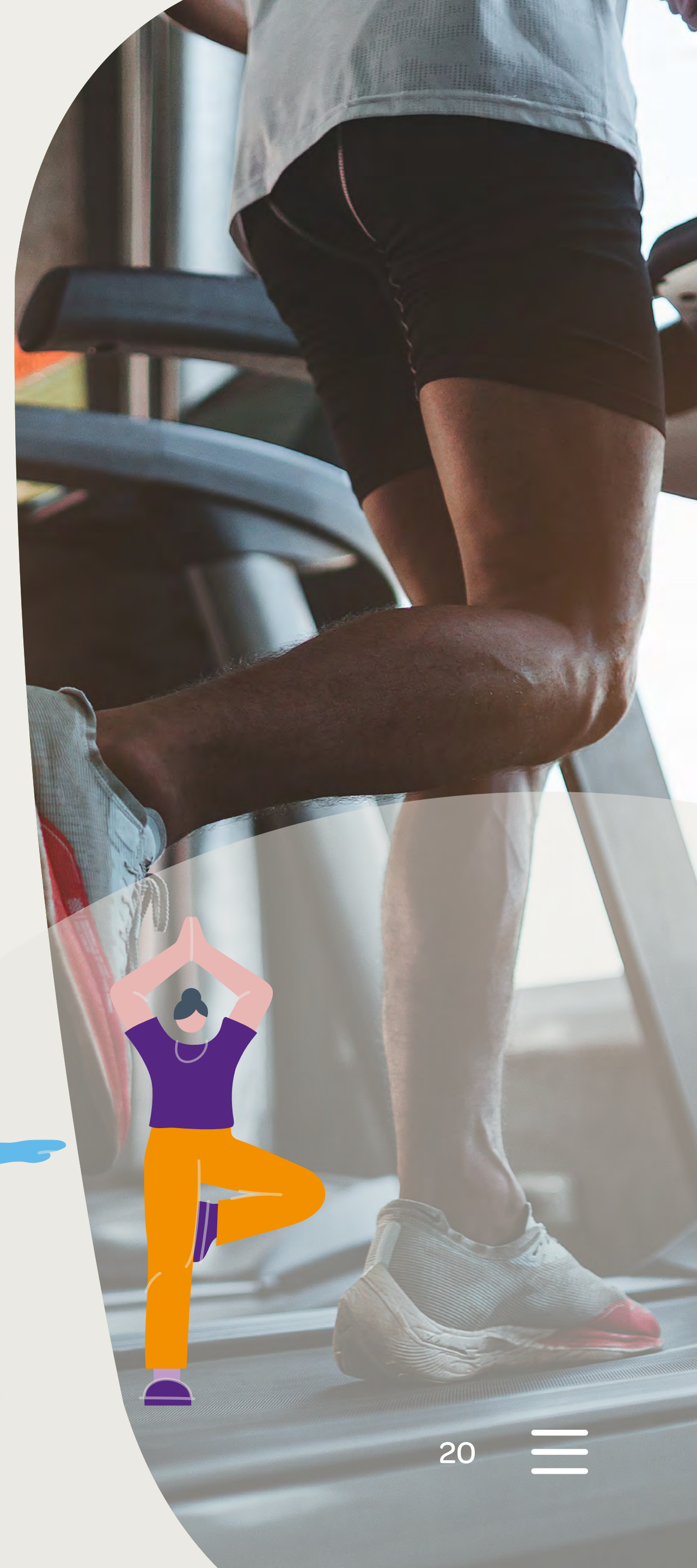
We take a proactive approach to supporting co-owner physical and mental health. We provide a wide range of services which aid in supporting wellbeing. Each office location and business unit has a Wellbeing and Resilience Lead who champions wellbeing by:

- **Advocating/promoting healthy lifestyles and positive mental health.**
- **Engaging co-owners on wellbeing initiatives.**
- **Organising activities.**
- **Initiating informal talks if needed (beyond the formal process through HR and line management).**

We offer an annual Health & Wellbeing Allowance to support co-owners to undertake sport or leisure activities outside of work which support good physical and mental health. The allowance can be used to contribute to the cost of a wide range of activities.

Some examples of how co-owners have used the Health & Wellbeing allowance include:

- **Towards the cost of a gym/golf club/tennis club/rowing club/drama group membership.**
- **To pay for exercise classes/tuition or sports equipment/accessories.**
- **To enter races/competitions and sporting events.**
- **Singing/pottery/language/photography/weight loss support classes.**
- **Equipment for hobbies.**
- **Subscriptions to meditation/yoga apps or similar.**



We also offer the Employee Assistance Programme (EAP) which is designed to support any personal or professional concerns which could be impacting on general health and wellbeing. The service includes telephone and online advice 24/7 covering all matters ranging from health and wellbeing, including structured counselling, to family matters and financial management.

We support co-owners returning from parental leave by connecting them with buddies or mentors with relevant experience.

## AXA Services includes a number of services such as:



**AXA Stronger Minds**  
(AXA direction to the appropriate care (counsellor, psychologist, self-help resources etc))



**AXA Working Body** (to discuss any aches and pains with a physiotherapist, without the need for a GP referral)



**AXA Health Age**  
(assess health age and provide tailored guidance about improving health)



**Health at Hand**  
(option to discuss medication or treatment options)



**Doctor at Hand**  
(a virtual GP service)



## Learning and development

Our focus on personal development is key to our high level of retention.

We have a robust Performance and Development process, and all co-owners have the opportunity to create an Individual Development Plan and are supported to work towards their career goals. In the last 12 months, 50 co-owners were recognised for their development through promotion to new roles.

We continue to invest in our existing leadership, line management and assistant development programmes and are introducing new programmes each year.

Our Assistant Development Programme is highly valued by co-owners who join the company early in their careers, and this year we introduced a structured graduate programme which provides an even richer learning experience for assistants joining the company.

We also provide two leadership development programmes, for senior level co-owners and for Associate Directors and above.

For our Assistant Planners we also provide support and mentoring in achieving their APC and becoming full members of the RTPI and other professional bodies

“

Through participation in the Assistant Development Programme, I had the opportunity to develop my skills and knowledge in areas that were crucial for my professional growth. Furthermore, I was able to establish lasting and valuable connections with co-owners who are in a similar level to me, as well as senior co-owners across the company. These connections can prove invaluable, offering chances for collaboration, mentorship, and collective development, ultimately enriching both my personal and professional growth at Turley.

We also introduced a new development programme designed to empower and release potential in co-owners, strengthening and diversifying our talent pipeline.

“

I would honestly say this is the best training I have had. I've approached it from a work perspective but have taken away many things that will equally apply to my personal life and feel better for it. I am more confident in myself than I was at the start of the programme, and am able to communicate myself better.



There are currently

# 60

co-owners with an **internal mentor**.

## Mentoring programmes

Our mentoring programme is an essential tool for development of our co-owners. Our aim is to create cross-business unit partnerships which will further support connections across the company. Mentoring provides opportunities for both mentors and mentees to engage in continuous learning. Our mentoring programme is inclusive and available to all co-owners.

There are many benefits to mentoring:

- **Mentees:** developing confidence, extending support network, supporting career development and acquiring new perspectives.
- **Mentors:** sense of achievement through supporting mentees' learning and development, enhancing listening skills, drawing on support network to help others, developing wider perspective and opportunities for two-way learning.
- **Company:** even more fulfilled, committed, resourceful, networked and motivated co-owners.

We have completed a pilot of reverse mentoring, where a more junior co-owner acts as a mentor for a senior leader, giving them a different perspective on business matters/issues. This involved 72 co-owners (36 pairings). 'Reverse mentors' are co-owners at Associate Director level or below. All of our leadership and operational management teams took part as mentees in the pilot programme and we are currently reviewing the effectiveness of the programme.

## Sponsorship programme

We have continued our sponsorship programme since our successful pilot in 2021, with tailored development for co-owners further developing their leadership and work winning capability to support and diversify ongoing succession which is fundamental to our employee owned company. To date we have had 26 successful relationships.





## Recruitment and retention

### Recruitment

93% of our recruitment during the period was direct hires. Existing co-owners are key advocates supporting our recruitment processes and we offer referral rewards to co-owners who refer successful candidates. We had 10 successful referrals from co-owners during this period.

We take care to ensure that our processes are inclusive and attract diverse interest. In the last year we have provided work experience and mentoring to a number of students through Mayor's Fund for London, 10,000 Interns Foundation, and the Career Ready organisations.

We advertise our roles with supporting statements from existing co-owners highlighting their experience of the benefits of working for Turley. During our 40th anniversary year of 2023, we also highlighted co-owners celebrating anniversaries with the company in a profile-raising exercise highlighting our culture.

### Retention

Co-owner turnover was down from 12% to 8%, significantly below the national average which sits around 15-17%. 93% of co-owners have been with the company for over a year which reflects strong retention and remains consistently high. We have 20% of co-owners who have been with the company for over 10 years, and 50% who have been with us for over 5 years.

At Turley we care for our co-owners, we invest in wellbeing and talent development, we reward and recognise contribution and achievement, and our co-owners have a voice in how we work.

Our blended flexible working model also allows co-owners to work flexibly to pursue interests outside work and establish or maintain a healthy work life balance.

# 93%

of our recruitment during the period was **direct hires**.



We continue to invite new line managers to complete our enhanced line management training programme which focuses on the role of line managers in ensuring team wellbeing and engagement, particularly in a hybrid working environment. We continually review the resources available to support co-owner wellbeing at work.

Financial wellbeing is also a key focus, with financial wellbeing webinars and 1:1 financial coaching sessions offered to co-owners with further webinars and 1:1s to be rolled out.

Co-owners at all levels have a voice at Turley. Fortnightly 'Turley Pulse' engagement surveys enable co-owners to express views, share feedback and make suggestions on a wide range of matters affecting life at Turley, results are shared and actions agreed in local teams in response.



Co-owner benefits suite includes:

- **Pension scheme.**
- **Flexible working allowance and blended (hybrid) flexible working.**
- **Ownership dividend (same amount payable to all co-owners subject to our Reward Policy).**
- **Discretionary bonus (annual).**
- **Medium term incentive (Strategic Value Plan) targeted at co-owners creating value in the medium term.**
- **Flexible benefits including dental and critical illness insurance (UK).**
- **Sabbatical policy and option to purchase additional leave (up to 40 days). Our annual leave allocations range from 25-30 days plus bank holidays which can be taken flexibly.**
- **Life assurance and income protection.**
- **Enhanced maternity, paternity and shared parental leave pay.**
- **Health and wellbeing annual allowance.**

# Governance

## Business model

As an independent employee-owned business our decision-making is agile.

Company Directors are responsible for ensuring ongoing good governance of our business.

Turley Trustees Limited (our corporate trustee) is the legal owner of the shares in Turley Associates Limited. Turley Trustees Limited holds the shares as trustee on behalf of co-owners on the terms set out in the Trust Deed (as amended by the Deed of Amendment). Turley Trustees Limited is formed of an independent Director Chair, two company appointed Trustee Directors, and two co-owner elected Trustee Directors.

The Trust company is a separately constituted body and governed independently from the company's own Company Directors.

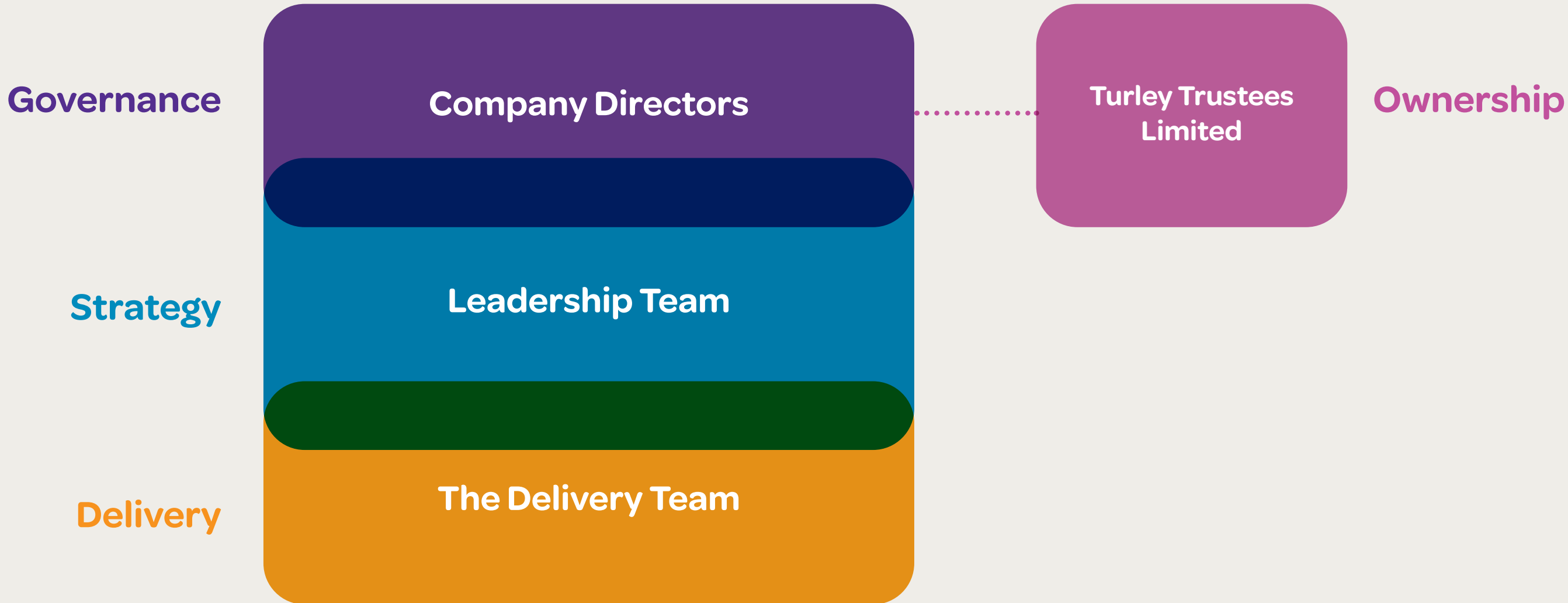


# Leadership

Our Leadership Team takes prime responsibility for setting our business strategy and ensuring it is delivered. It has strategic oversight of financial performance, people, wellbeing and culture, and priorities for growth and business development. It is supported by and works closely with all Senior Directors.

During 2022/23 we welcomed three strategic advisors to our business as part of our 'Catalyst for Change' programme (a programme to accelerate the pace of change and bring even more diversity to our decision-making). A member of Embrace (our EDI network) attends Leadership meetings.

Our Delivery Team has operational oversight of our teams and delivers key business priorities. These include nurturing client relationships, leading business development, and promoting and deepening our company culture.



## Succession

Leadership succession is an essential part of the long term sustainability of our company and has added importance in the context of employee ownership. Done well it can invigorate a business, harness new energy and ideas, and engage and motivate teams.

We use a distributed leadership model plan which delegates decision-making deeply throughout the company.

We plan for ongoing succession through talent management discussions at a company, BU and team level.

Succession provides opportunities for our next generation leaders; playing to strengths through co-owner development; and best fit contributions.

In May 2023, Stephen Bell was appointed as Chief Executive and Dave Trimmingham commenced a new position as Executive Chair.

We implemented an open, fair and objective selection process where final decisions were understood and accepted by our leadership.

Two external panellists offered an independent perspective and were involved in preparation; setting an objective interview framework; interviews; and recommendations for appointment to Company Directors for the appointment.

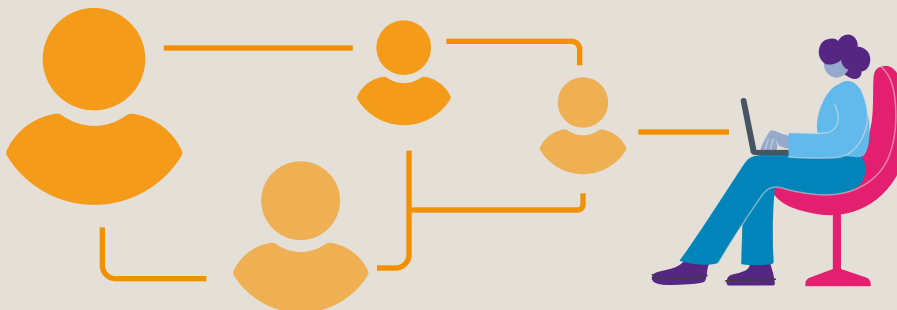
# Our approach to Governance...



Reflects our company purpose, attributes and distinctiveness – it is authentic.



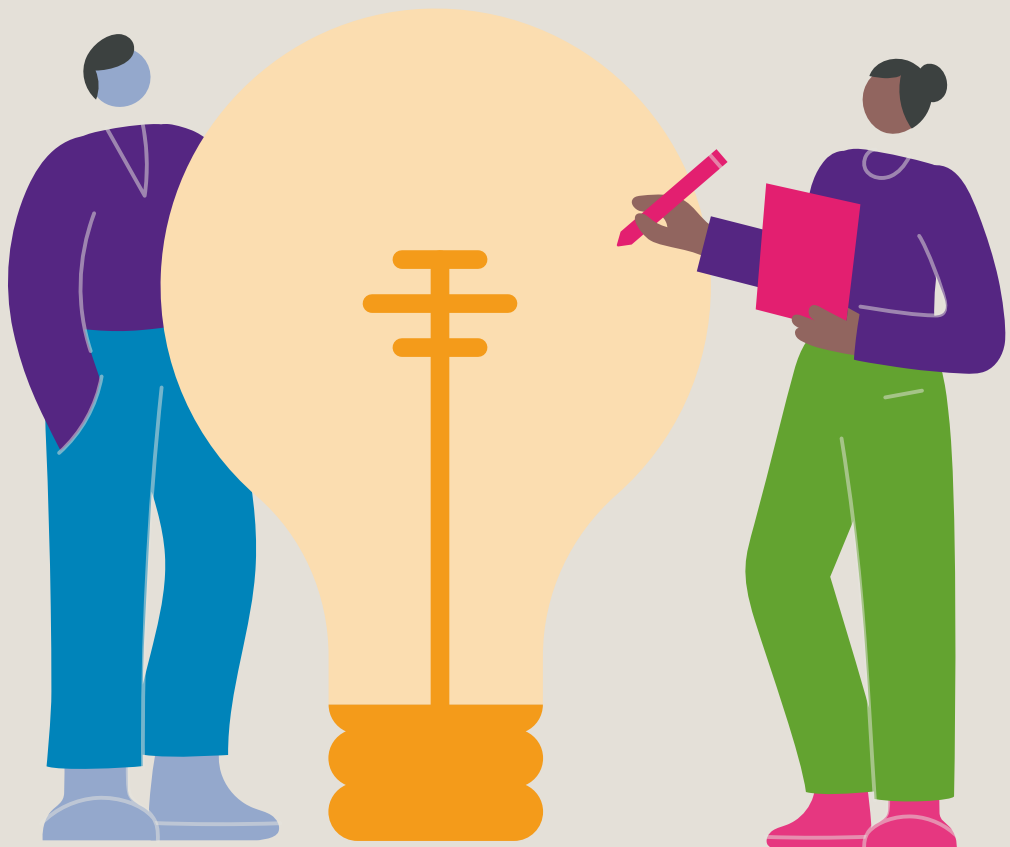
Reflects our employee-owned status – including appropriate engagement and transparency.



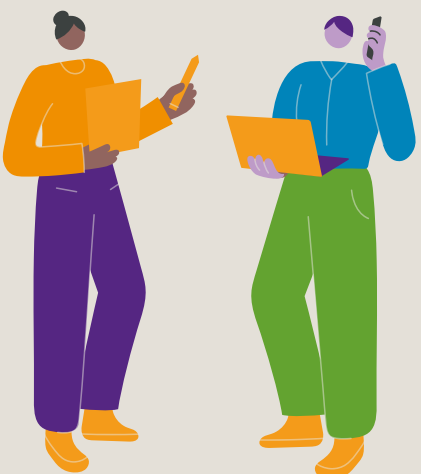
Is consistent with our approach to distributed leadership – our decisions are made at the right level by the right co-owners.



Ensures our decision-making responds to our business environment – speed, agility and responsiveness.



Provides clarity of who decides what – whether alone, in consultation or in collaboration and being clear when matters are shared for information, for sounding, or for decision.



Ensures the accountability of leaders – checks and balances to avoid any co-owner having too much decision-making responsibility.



Gives authority to those who need it – based on role, trust and confidence.



Facilitates challenge and support to engender a sense of personal and collective responsibility – better quality debate and decision-making with full commitment from all.



Manages the potential conflicting interests of any stakeholder – ensuring an objective and independent perspective.

## Compliance with laws and regulations

We comply with laws and regulations which apply to our business.

## Health and safety

We continue to run our Health and Safety Management System under HG65 H&S Regulations 1974 and also renew our annual accreditations with SMAS SSiP certification, Alcumus accreditation, CQMS certification and Constructionline accreditation. This ensures our varied range of clients, including mainly our residential clients, are happy with our commitment to Health and Safety, while undertaking our project, design and site work.

The Company Directors continue to oversee the annual review of our H&S policy, and we take soundings from an external consultant from SQE Solutions together with our Representative for Safety, under NEBOSH general certification to ensure any new areas of risk are identified and action is taken.

“

Our management system is **flexible** and **agile** and we can adjust our procedures to fit future client requirements and requests.

We continue to ensure that we monitor the various sections under our management system, which include office and fire safety risk assessments, DSE assessments, new and expectant mothers' assessments, young people assessments, DDA assessments and site risk assessments.

Our management system is flexible and agile and we can adjust our procedures to fit future client requirements and requests, as our future project work takes us into new sectors and services.



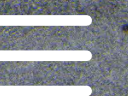
## Data privacy and security

Organisations that process personal information are required to register with the Information Commissioner's Office (ICO). Depending on the circumstances, Turley is both a data controller and data processor. Our ICO registration number is Z7714146.

Turley has Cyber Essential certification, demonstrating our commitment to cyber security and that we have systems and procedures in place to guard against the most common cyber threats. We also have a data protection policy, along with a full suite of privacy notices covering data protection for clients, suppliers, job applicants and co-owners, contractors and workers. Our Cyber Essentials certificate, data protection policy and privacy notices can be found [here](#).

Our company intranet (known as the 'Hub') has a section dedicated to data protection. It covers the rights and responsibilities of co-owners, general data protection information, links to our privacy notices and specific information about procedures for human resources, information technology, public consultations and business development.

On joining the company, all co-owners are required to confirm that they have read and understood a page on the Hub outlining their data protection rights and responsibilities. The page is set as a 'mandatory read' which enables us to comply with the UK GDPR requirement to ensure that employees are fully informed.





## Professional standards and engagement

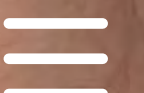
Our co-owners hold over 220 memberships of professional institutions, including RTPI, Irish Planning Institute, IHBC, IEMA, Landscape Institute, CIPR, BRE, CIPD, RICS, NIPA, ACCA, CIMA and BCS.

Over the last 12 months, we have continued to support the work of the RTPI, RICS, IEMA, Landscape Institute, IHBC and CIPR as well as many other professional bodies and trade organisations which we belong to as individual co-owners or as corporate members. As a result, our co-owners hold senior positions in all of the professional bodies we are associated with, and as Learning Partners of the RTPI we have regular opportunities to positively engage with and contribute to our professional bodies' work and policies.

We are thought leaders within our industry and comment on current and emerging trends and other topics which relate to our industry and our clients' business. We comment on legislation and collaborate with leading industry organisations (such as HBF, LPDF, BPF, UKGBC and the NLA). This year we have published over 160 thought leadership pieces on a wide variety of topics including repurposing town centres, planning for recovery, green energy and logistics.

“  
Over  
**220**

memberships  
of professional  
institutions held by  
our CO-OWNERS.



Rules

Integrity

Good

Harm

Truth

## Company ethics and integrity

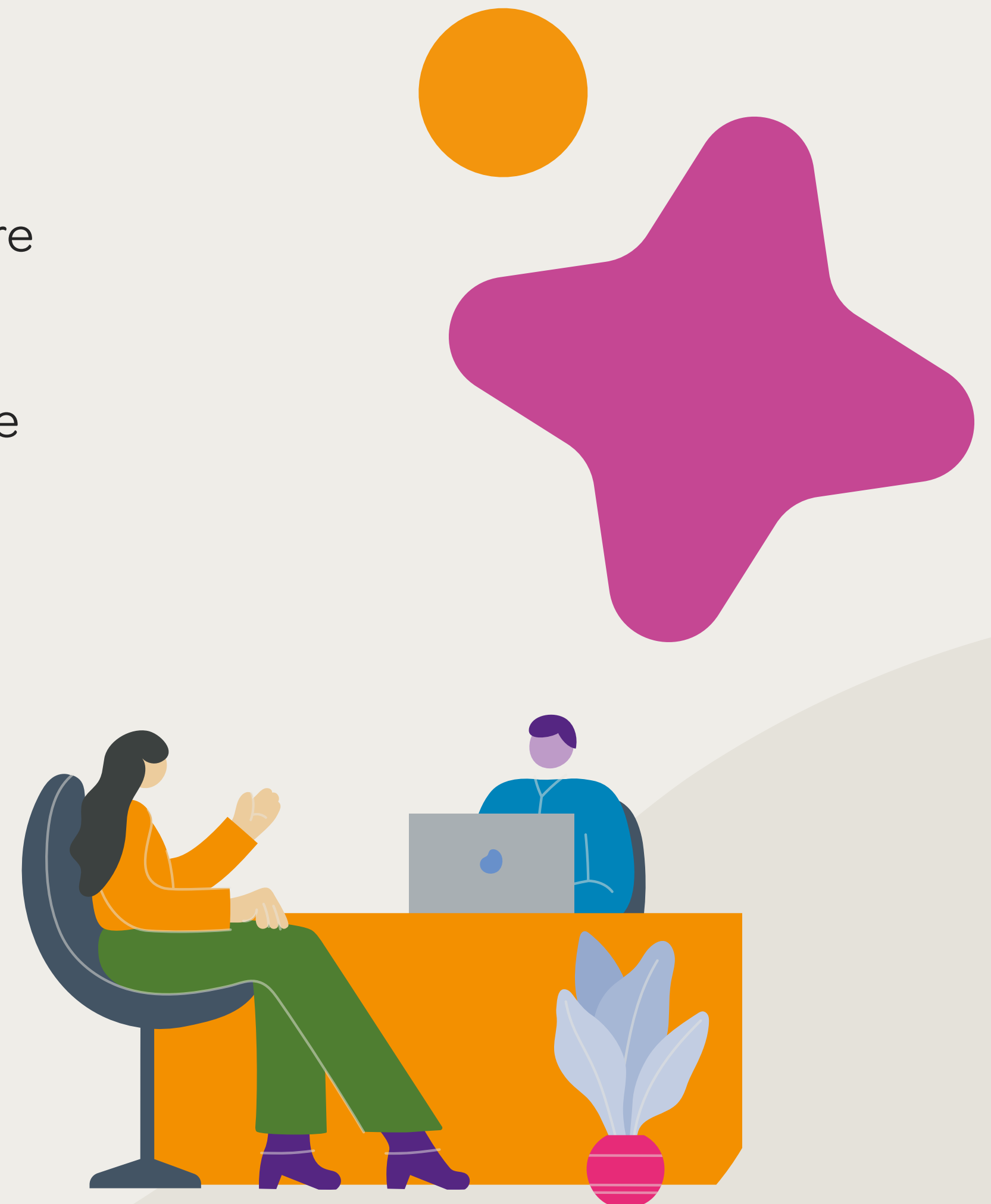
We reviewed and updated our Ethics guidance in 2023 to ensure it was up to date and to include some new case studies. This document gives co-owners a practical understanding of the risks around ethics and how our ethical approach can shape the company we want to be.

We added more recent project examples where our company ethics have guided our decision-making, as well as the Ethicability Framework. This takes into account five areas – Rules, Integrity, Good, Harm and Truth (RIGHT questions).

We will work with clients who share our desire to shape better places.

We follow the ethical codes of practice for all of our professional bodies.

Each project has a decision-making process if there is an ethical consideration regarding clients or nature of work and its potential impacts.



## Financial performance

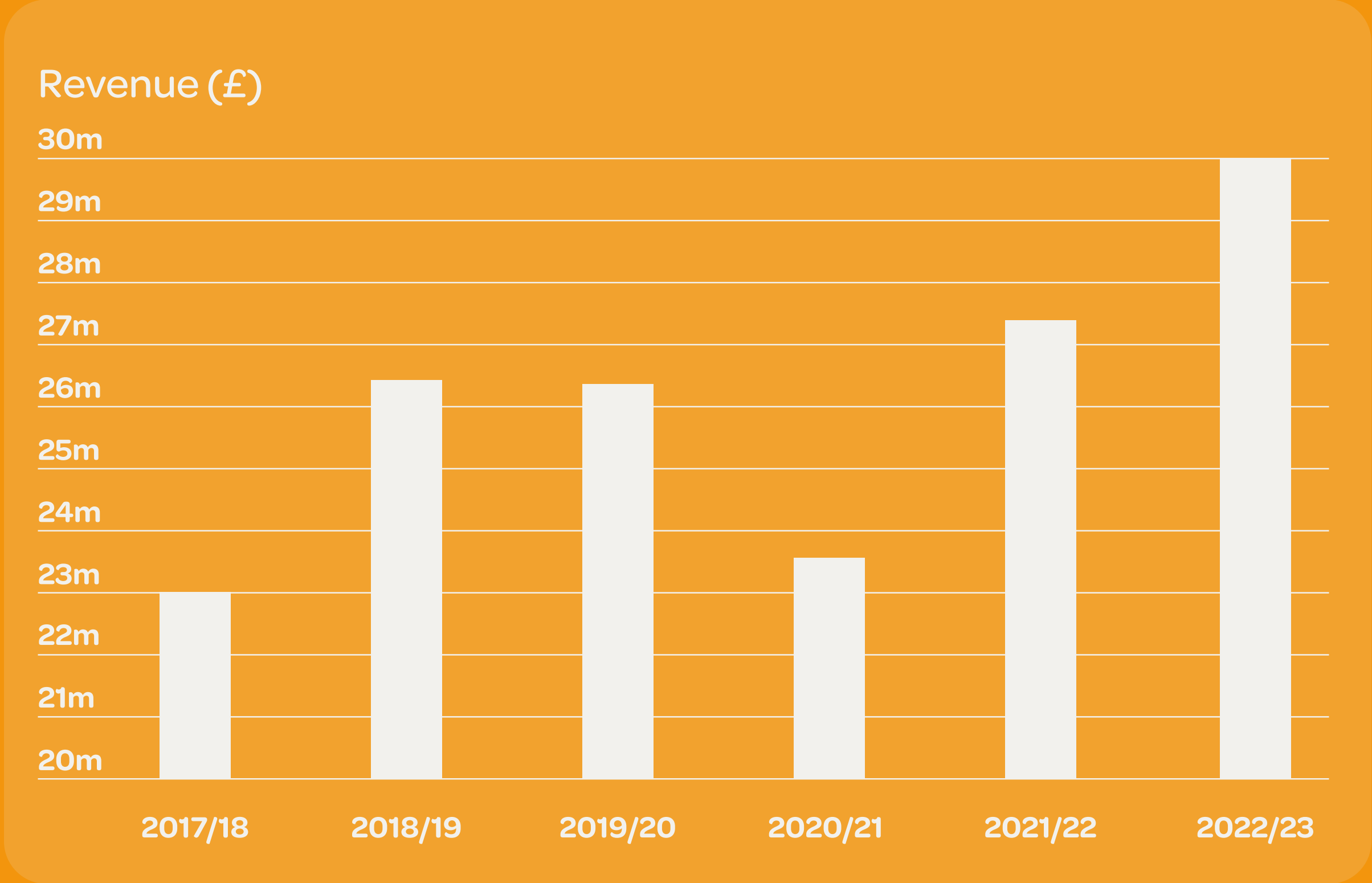
Revenue continues to grow steadily, with an additional 10% over 2021/22. We have rewarded co-owners with £1.5m in bonus and employee owner dividend. This equates to 5% of revenue generated.

# £1.5m

bonus and employee owner dividend rewarded based on FY 2023 performance.

# 10%

revenue growth over the last year.



## Investments/pensions

We operate a Group Personal Pension (GPP) scheme with Aviva, and a separate scheme with Zurich for our co-owners employed in the Republic of Ireland. The company contributes up to 11% (Directors receive 10% plus an additional 1% after 10 years of service) of base salary and employer NI savings are given back to co-owner GPP funds. These contributions are competitive in the market and benchmarked annually.

The Trustee Directors of Turley Trustees Limited have pension Governance as part of their role. Our GPP does not require a formal Pension Committee. However, our Trustee Directors wish to work with Benefiz (our benefits intermediary) to ensure good member outcomes. Benefiz delivers a pension governance report and presentation to Trustee Directors which takes place annually.

Trustee Directors work together with our independent Trustee Director, Chair and Benefiz to consider the quality of the plan and auto-enrolment compliance.

The annual pension governance review meeting focuses on:

- **Plan eligibility**
- **Contribution structure**
- **Default investment fund**
- **Fund performance**
- **Consideration of ESG funds**
- **Competitiveness of annual management charge (AMC)**
- **Appropriateness of plan design**

Co-owners have access to the 'My Aviva' app and options to choose funds including funds focusing on ESG. Aviva and Benefiz run pension webinars during the year which are available to all co-owners.

“  
**11%**”

The company contributes **up to 11% of base salary** and employer NI savings are given back to co-owner GPP funds.



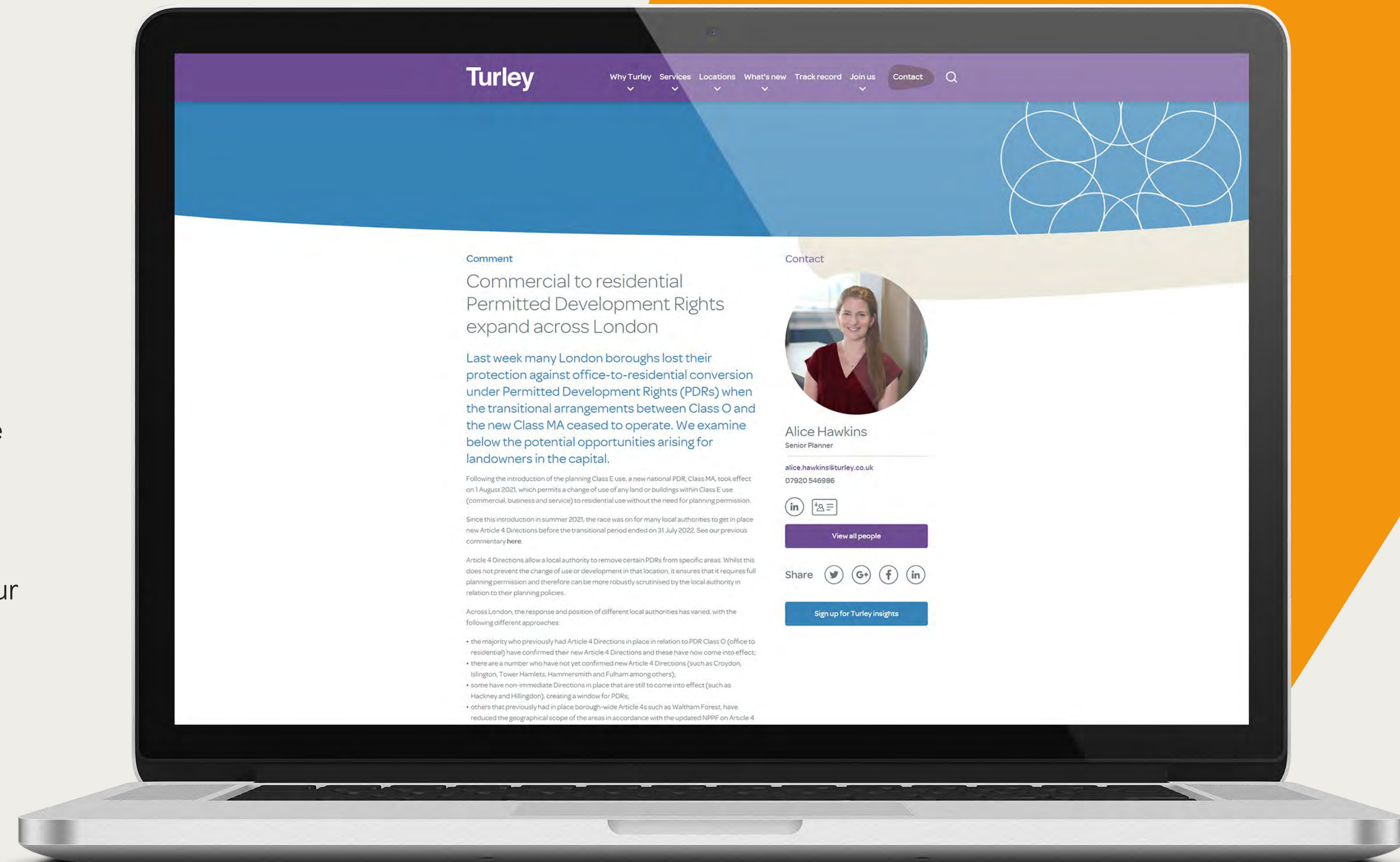
## Communications

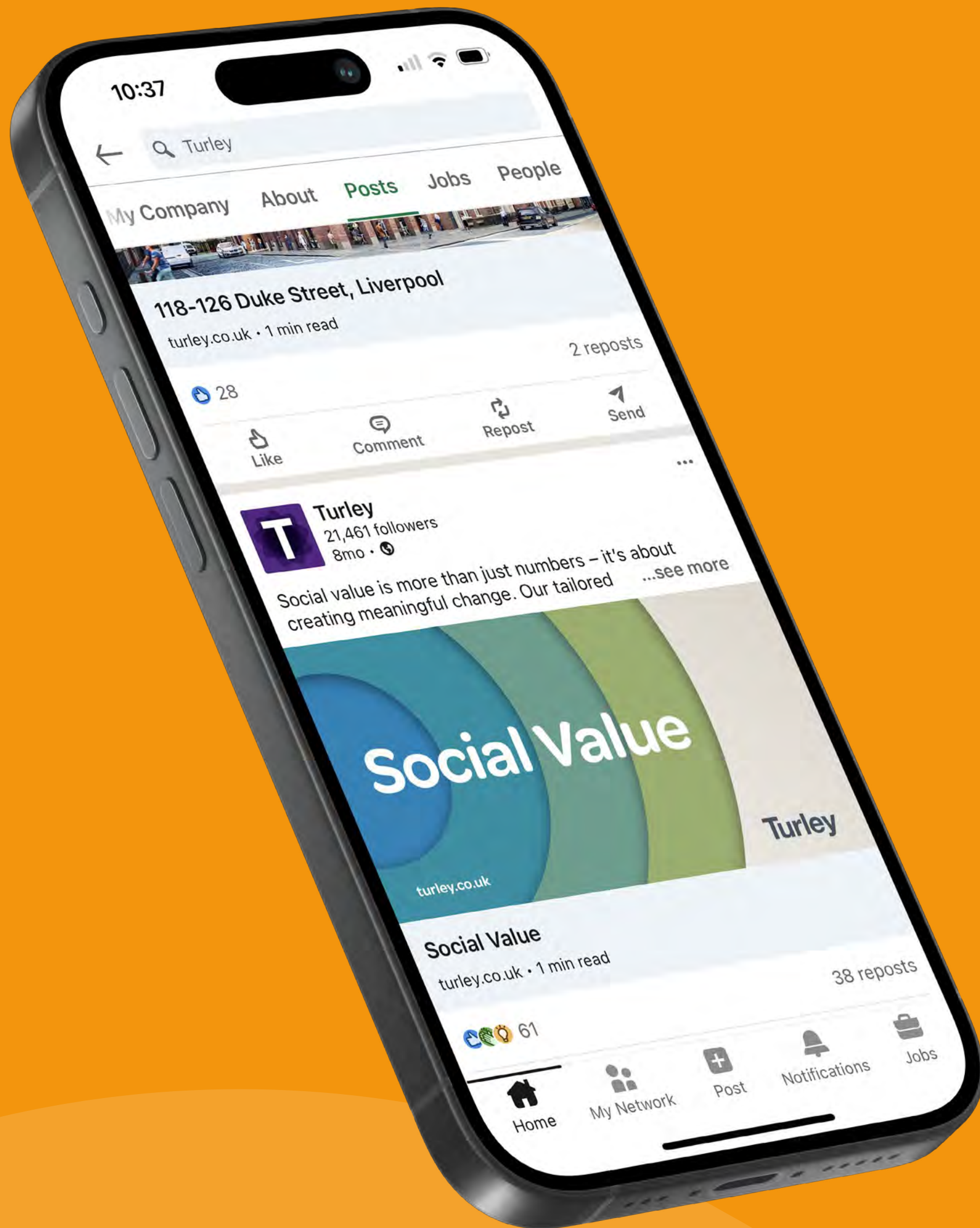
We position ourselves as thought leaders by commenting on current and emerging trends and topics which relate to our industry and our markets.

We aim to enhance the knowledge of our clients and stakeholders through external communications. This includes writing reports, producing comment pieces, and reacting to news and policy announcements. We also collaborate with leading industry organisations such as IEMA, UKGBC and the NLA.

In relation to our project work, we share news through our digital channels and through PR activity to promote our experience and the expertise of co-owners across our services.

All co-owners are encouraged to get involved by identifying key external communications topics, writing content and working with our Marketing and Business Development and Creative Design teams to present content in a variety of online and offline formats.





Some recent examples of successful content include:

- **Analysis on the Levelling Up and Regeneration Bill**
- **Gender mainstreaming thought leadership**
- **Co-Location in London report updated for 2023**
- **Must we leave heat networks behind? Analysis**
- **Quantified the cost of delayed local plans in research with the LPDF**
- **We have released ten episodes of our ESG Bites podcast, which includes conversations with key industry leaders in the ESG field.**

Information to help co-owners understand the different ways in which they can engage and share content to support business development and client relationships is available on our intranet. We also establish performance and development (P&D) objectives relating co-owners' roles in external communications as part of our commitment to continued professional development.

### External communication

Our external communication platforms are:

- **Company website** ([turley.co.uk](https://turley.co.uk))
- **LinkedIn channel** ([linkedin.com/company/turley/](https://linkedin.com/company/turley/))
- **Spotify, ESG podcast**
- **Podbean, ESG podcast**
- **Apple Podcasts, ESG podcast**



# Conclusion

We will continue to align our company activities to ESG commitments and ensure we focus on the areas which are material to our company.

## We will:

- ✔ Implement our ESG strategy (as co-designed with our co-owners during 2023)
- ✔ Continue to offer a pro bono service and donate our professional time to LandAid and other organisations.
- ✔ Continue to volunteer our time to charity projects around the UK and continue to raise funds for those in need. In time we hope to revisit our overseas partners.
- ✔ Undertake the BCorp foundation assessment working with BetterNotStop.
- ✔ Continue to make progress with Scopes 1 & 2 and have Scope 3 validated under the Science Based Targets initiative.
- ✔ Continue to advise clients and third parties to support their path to carbon neutrality and ESG commitments as part of a green recovery, implementing greenhouse gas reductions and Science Based Targets where appropriate.
- ✔ Continue to apply our key professional attributes of innovative thinking and a collaborative approach to deliver on our ESG ambition of delivering positively against all of the UN Sustainable Development Goals (UNSDGs).
- ✔ Ensure our co-owners and clients continue to benefit from our approach to a blended flexible working model.
- ✔ Continue to implement our Equity, Diversity and Inclusion (EDI) plan working with the Leadership Team and Embrace.
- ✔ Continue our work with our partners Career Ready, Mayor's Fund for London and 10,000 Interns to make our contribution to social mobility within our industry.
- ✔ Review our approach to reverse mentoring and sponsorship and increase diversity in our leadership (decision-making) forums.
- ✔ Continue our awareness programmes for co-owners and continue to prioritise wellbeing and resilience. Initiatives include financial awareness seminars, pension advice, mental health advice and awareness of women's issues.



# Appendix 1

# Glossary

**BCS:** British Computer Society

**BPF:** British Property Federation

**BRE:** Building Research Establishment

**CIPD:** Chartered Institute of Personnel and Development

**CIPR:** Chartered Institute of Public Relations

**CQMS:** Crown Quality Management Service

**DDA:** Disability Discrimination Act 2005

**DSE:** Display Screen Equipment

**GDPR:** General Data Protection Regulation

**HBF:** Home Builders Federation

**ICO:** Information Commissioner's Office

**IEMA:** Institute of Environmental Management and Assessment

**IHBC:** Institute of Historic Building Conservation

**LPDF:** Land Promoter & Developers Federation

**NEBOSH:** National Examination Board in Occupational Safety and Health

**REB:** Real Estate Balance

**RICS:** Royal Institution of Chartered Surveyors

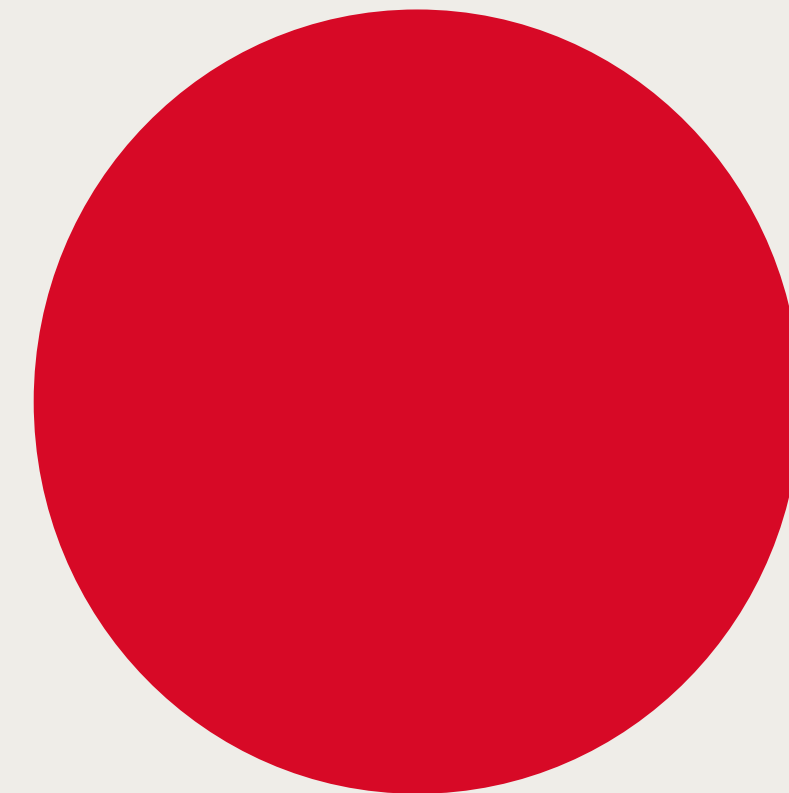
**RTPI:** Royal Town Planning Institute

**SBTi:** Science Based Targets initiative

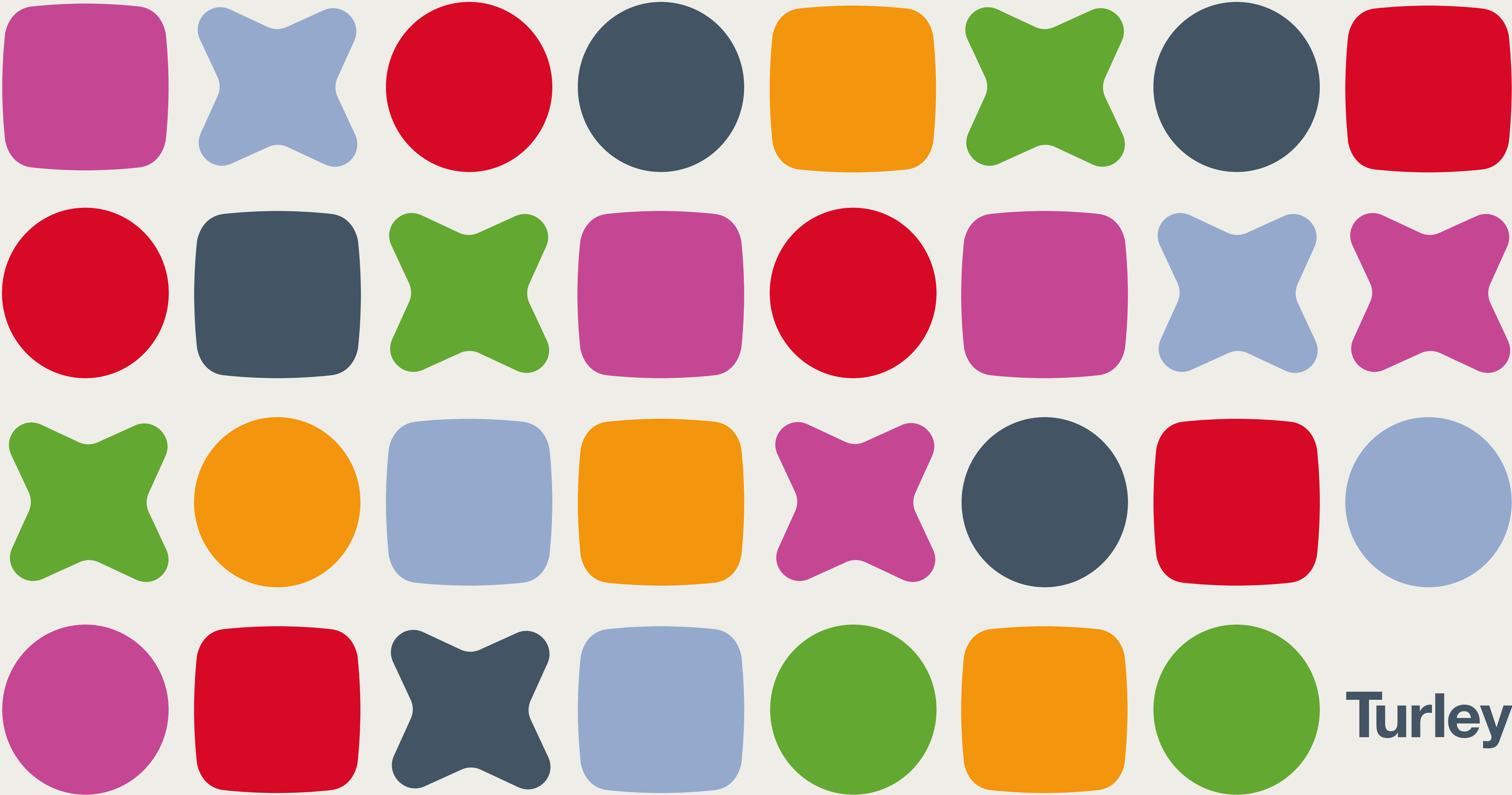
**SMAS SSiP:** Safety Schemes in Procurement

**UKGBC:** UK Green Building Council

**UNSDG:** United Nations Sustainable Development Goals







**Turley**