ESG Report 2024

Measurable actions for a more sustainable future.

Delivering Today,
Shaping Tomorrow.

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1.0 Introduction & Overview

At Wilson James, we recognise that long-term business resilience is inseparable from environmental responsibility, social impact, and strong governance. As our clients, employees, and stakeholders face increasingly complex sustainability challenges, our role as a trusted partner across aviation, construction logistics, and security services compels us to act decisively and transparently.

In 2024, we continued to evolve our approach to Sustainability, culminating in the completion of our sustainability strategy. This strategy, built around the pillars of Planet, People, and Performance, now provides a clear and comprehensive framework to guide our actions and priorities. It shapes how we assess risk, pursue opportunities, and drive progress across the areas that matter most to our business and the industries we serve.

This report reflects the alignment of our Sustainability reporting to our sustainability strategy. It outlines the tangible steps we've taken to reduce our environmental footprint, support our people and communities, and strengthen the systems that underpin ethical and effective governance.

From decarbonising our fleet and trialling alternative fuels, to launching new social value programmes and improving data transparency, our work in 2024 has laid the foundations for the next phase of our sustainability journey.

1.1 Our Commitment

We are committed to embedding Sustainability thinking into our core operations, ensuring that every part of the business is equipped to deliver value in a way that is responsible, inclusive, and future-ready. In Q4 2023, we submitted near-term and net-zero targets to the Science Based Targets initiative (SBTi), supported by a full baseline carbon inventory and third-party limited assurance of our greenhouse gas emissions.

Throughout 2024, we have piloted new circular economy models, expanded access to work experience and apprenticeships, and strengthened our governance practices in anticipation of growing regulatory expectations and stakeholder scrutiny.

1.2 Organisational Background and Industry

Wilson James is a service-based organisation with over 6,500 employees operating across diverse, high-impact sectors. As a non-manufacturing business, our environmental impact stems primarily from transport emissions, energy use, procurement, and employee commuting. At the same time, our scale and geographic footprint present significant opportunities to deliver social value, reduce inequality, and champion inclusive employment across the UK.

The industries we support are undergoing rapid transition, shaped by tightening carbon regulations, rising client expectations, and broader societal demands for ethical and equitable business.

Our work often takes place in complex, highly regulated environments where sustainability is no longer a differentiator, it is a requirement. We are responding to this shift with a pragmatic, data-driven approach, informed by operational realities and focused on real-world outcomes.

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1.3 Our Sustainability Priorities

This report is structured around the three thematic pillars (People, Planet & Performance) which represent our priorities:

Planet outlines our carbon performance, emissions reduction actions, energy and fleet transition progress, and efforts to integrate resource circularity into our logistics operations.

People explore our social value initiatives, including volunteering, apprenticeships, inclusive recruitment, employee wellbeing, and the development of an inclusive culture across our workforce.

Performance highlights our approach to strengthening our sustainability performance by leveraging clear governance mechanisms with a focus on our policy-led approach to ethics & responsible business conduct, and alignment with strategic disclosure frameworks to benchmark progress and identify areas for targeted improvement.

This report represents the tangible progress we've made. It captures how we are laying the groundwork for a more sustainable and inclusive future, and how we are preparing to embed sustainability into every part of our business as we move from planning to implementation.

2.0 Planet

2.1 2024 Carbon Report

In line with our commitment to responsible environmental stewardship and sustainable business practices, this section of our report outlines our carbon performance for the 2024 calendar year and our approach to decarbonisation.

With 2030 rapidly approaching, we recognise the need to significantly accelerate our efforts to meet our near-term, decarbonisation targets: a 42% absolute reduction in Scope 1 and 2 emissions, and a 51.6% reduction in Scope 3 emissions intensity. These targets are fully aligned with the Science Based Targets initiative (SBTi), based on the absolute contraction method for Scopes 1 and 2, and the economic intensity approach for Scope 3 emissions, as defined by the SBTi Corporate Standard.

Understanding and managing our emissions through accurate measurement, regular tracking, and transparent reporting is critical to achieving our wider sustainability objectives and realising our Net Zero ambition. Our carbon accounting practices are aligned with the Greenhouse Gas (GHG) Protocol, ensuring consistency, accuracy, and standardisation across all reporting scopes.

This section covers our 2024 emissions performance across:

- Scope 1 – Direct emissions from sources we own or control
- Scope 2 – Indirect emissions from purchased electricity
- Upstream Scope 3 – Emissions from categories 1–8, which are material to our operations

Over the past year, we have made notable progress across Scopes 1 and 2, achieving reductions of 10% and 9% respectively compared to our 2023 baseline, outperforming the minimum 6% annual reductions required to stay on course for our 2030 targets. These reductions are primarily attributable to our transition to renewable electricity and the adoption of sustainable fuels, which are explored further in subsequent sections.

However, our upstream Scope 3 emissions intensity increased by 1% over the same period, highlighting the continued complexity and volatility of managing emissions across our value chain. In response, we have carried out a rigorous assessment of key emissions hotspots and are implementing a more targeted, data-led strategy to drive reductions where they matter most.

The subsequent sections provide a detailed breakdown of our emissions profile, year-on-year performance, and the challenges and opportunities that lie ahead as we continue to decarbonise our operations and supply chain.

2.1.1 Reporting Scope

Our carbon reporting covers Scope 1, Scope 2, and upstream Scope 3 emissions, specifically covering categories 1–8 as defined by the Greenhouse Gas (GHG) Protocol. These represent the relevant sources of emissions within our operational control and value chain.

Downstream Scope 3 emissions have not been quantified, as they are not applicable to Wilson James. This is due to the nature of our business, which does not involve manufacturing activities or the sale and distribution of physical products. As a service-based organisation, our carbon footprint is primarily concentrated in our direct operations and upstream supply chain.

2.1.2 Fuel Combustion | Scope 1

Our fleet remains the primary source of Scope 1 emissions, supporting the delivery of core services across our business operations. These include Passenger Assistance Services at airports, construction logistics, VIP services, and infrastructure logistics, all of which rely on a dependable fleet to ensure safe, efficient, and high-quality service delivery.

This operational dependency on fleet transport results in significant carbon emissions from fuel combustion. While our transition to Zero Emission Vehicles (ZEVs) is actively progressing, several challenges continue to affect the pace of transition. These include:

- Limited availability of reliable charging infrastructure
- Operational constraints (e.g. vehicle range, load capacity, route flexibility)
- Cost feasibility for specific vehicle types and use cases

As a result, our reliance on fossil fuels, particularly diesel, remains high across several service areas.

In 2023, our fleet operations consumed approximately 571,000 litres of fuel, with diesel accounting for over 90% of the fuel mix. This translated into 1,397 tCO_2e, representing over 99% of our total Scope 1 emissions.

In Q4 2024, we commenced the intentional trial of Hydrogenated Vegetable Oil (HVO) across parts of our diesel fleet. This trial is part of our phased strategy to reduce and eventually eliminate diesel use, while scaling up our transition to electric vehicles. As a result of this shift:

- HVO usage increased by 28% compared to 2023
- Fleet emissions decreased by 130 tCO_2e (a 9% reduction) against our 2023 baseline
- This reduction is attributable to both HVO substitution and the gradual electrification of our fleet

Natural gas accounted for less than 1% of total Scope 1 emissions in 2024, and emissions from this source declined by 5 tCO_2e compared to our 2023 baseline.

The table below provides a summary of key Scope 1 emissions metrics for 2024.

Table 1. Scope 1 2024 Highlights

Initiatives & KPIs	Result (2023/24 Comparison)
Phasing-out Diesel	18% reduction in overall diesel use
HVO Adoption	28% increase in HVO used
Overall Fuel Consumption	7% reduction in overall fuel consumption
Fleet-Specific Carbon Reduction	9% reduction (130tCO_2e)
Total Scope 1 Reduction	10% reduction (135tCO_2e)

The progress highlighted in the table above, particularly our total Scope 1 emissions reduction, demonstrates that we are firmly on track to achieving our near-term target of a 42% reduction in Scope 1 emissions by 2030. Our performance to date has already exceeded the minimum annual decarbonisation trajectory, with a 4% margin above the required reduction rate.

Despite this positive trajectory, we recognise that sustained progress will require continued commitment and action. We will therefore intensify the implementation of our bifurcated fleet decarbonisation strategy, which combines the transition to Zero Emission Vehicles (ZEVs) with the adoption of low-carbon fuel alternatives such as HVO. This dual approach enables us to accelerate emissions reduction while navigating the operational and infrastructure constraints of a full ZEV rollout.

2.1.3 Purchased Electricity | Scope 2

Purchased electricity accounted for less than 1% of our total emissions in 2024, with 101 tCO2e recorded. Electricity is primarily used to power our offices, consolidation centres, and electric vehicle (EV) fleet.

We report Scope 2 emissions using both the location-based and market-based methodologies, in accordance with the GHG Protocol. However, we monitor progress towards our decarbonisation targets using the market-based approach, which better reflects our procurement choices and investment in clean energy.

In Q4 2024, Wilson James completed a full transition to 100% renewable electricity across all properties under our direct management. This was achieved through REGO-backed (Renewable Energy Guarantees of Origin) tariffs, ensuring that all purchased electricity is sourced from certified renewable providers.

This transition resulted in a 9% reduction in Scope 2 emissions (equivalent to 9.3 tCO2e) compared to 2023 levels, placing us 3% ahead of the minimum 6% annual reduction required to stay aligned with our 42% Scope 2 reduction target by 2030.

Table 2. Scope 2 2024 Highlights

Initiatives & KPIs	Result (2023/24 Comparison)
Scope 2 Reduction	9% (9.3tCO2e) reduction
2024 Renewable Energy Use	25% Renewable Energy

2.1.4 Indirect Emissions | Scope 3

Our Scope 3 reporting boundary is limited to upstream categories (1-8), in alignment with the nature of our operations as a service-based business. As we do not engage in the manufacturing, production, or distribution of physical goods, downstream Scope 3 emissions are not applicable to Wilson James.

Key Scope 3 Hotspots

Our upstream Scope 3 footprint is heavily concentrated in three key categories:

- Purchased Goods & Services (Category 1)
- Employee Commuting (Category 7)
- Capital Goods (Category 2)

Together, these categories account for over 90% of our total Scope 3 emissions, with Purchased Goods & Services alone contributing approximately 65%. The most material emission sources within this category include:

- Procurement of agency workers
- Repair and maintenance of vehicles and plant fleet
- Purchase of plant and traffic management equipment
- PPE and uniforms
- Construction support supplies (e.g. portacabins, cranes, floodlights)
- Office stationery, janitorial supplies, and services

Accounting Approach/Methodology

We apply a hybrid methodology for Scope 3 accounting, combining supplier-specific emissions data where available, with a spend-based approach for categories where detailed emissions data is not yet accessible. Currently, most of our data for Categories 1, 2, and 4 are estimated using the spend-based approach, which while useful for high-level assessments does not fully reflect:

- The actual carbon performance of suppliers
- Any decarbonisation interventions suppliers may have implemented

As a result, these estimates may overstate actual emissions, emphasising the need for more accurate, activity-based data collection.

Despite broader challenges, we achieved meaningful reductions in several Scope 3 categories:

- Category 2024 Reduction vs 2023 Baseline Approach
- Category 3 – Fuel- and energy-related activities 6% reduction Absolute contraction
- Category 5 – Waste generated in operations 8% reduction Absolute contraction
- Category 8 – Upstream leased assets 19% reduction Absolute contraction

However, at an overall level, total Scope 3 emissions increased by 1% compared to our 2023 baseline.

This highlights the complexity of decarbonising indirect emissions and reinforces the need for sustained collaborative action.

We recognise that Scope 3 represents not only the most material portion of our emissions profile, but also the most challenging to decarbonise. To tackle this, we are taking a proactive and structured approach, with the following initiatives planned for implementation over the next two years:

Supply Chain Sustainability Forums

Launching cross-industry working groups to drive data sharing, co-develop carbon solutions, and collect accurate sustainability data.

Wilson James Supplier Balanced Scorecard

Introducing a sustainability performance framework to assess and benchmark suppliers on key ESG metrics, including emissions, waste, ethics, and social value.

Upskilling through the Supply Chain Sustainability School (SCSC)

Supporting suppliers with access to free training and learning resources covering key sustainability topics-such as carbon management, circularity, ethical sourcing, modern slavery, and community impact.

Sustainable Travel Interventions

Implementing practical measures to reduce emissions from employee commuting, including modal shift strategies, flexible working arrangements, and targeted behaviour change campaigns.

By embedding data-led decision-making and supplier engagement at the heart of our Scope 3 strategy, we are laying the groundwork for credible, collaborative, and sustained emissions reduction across our value chain.

2.1.5 2024 Carbon Inventory

Emissions Scope	Emissions Sources	Carbon Emissions (tCO2e)
Scope 1	Fleet Emissions (Fuel Use) & Boiler Emissions (Natural Gas	1,271
Scope 2	Purchased Electricity (Market based)	116
	Purchased Electricity (Location based)	97
Upstream Scope 3	Cat 1 - Purchased Goods & Services	13,741
	Cat 2 - Capital Goods	1,605
	Cat 3 - Fuel & Energy Related Activities	321
	Cat 4 - Upstream Transportation & Distribution	191
	Cat 5 - Waste Generated in Operations	10
	Cat 6 - Business Travel	380
	Cat 7 - Employee Commuting	5,713
	Cat 8 - Upstream Leased assets	475
Downstream Scope 3	N/A	
Total Scope 3		**22,441**
Total Carbon Footprint		**23,828**

2.1.6 SBTi Commitment & Target Setting

In Q4 2023, we formally committed to setting both Near-Term and Net-Zero Science-Based Targets with the Science Based Targets initiative (SBTi). Throughout 2024, we have collaborated closely with internal stakeholders and external partners to refine and establish a comprehensive and robust carbon inventory baseline for the 2023 calendar year.

This has formed the foundation for developing ambitious yet achievable Near-Term and Net-Zero targets, which have now been submitted to the SBTi for validation. We anticipate formal approval of our targets well before the end of the year and remain fully committed to transparently reporting progress against these targets on an annual basis through our carbon reports.

Third Party GHG Inventory Limited Assurance & Verification
To strengthen the credibility of our carbon accounting and ensure alignment with emerging regulatory and customer expectations, we have initiated annual third-party limited assurance of our greenhouse gas (GHG) inventory, commencing with our 2023 baseline year.

This assurance engagement was conducted in accordance with ISAE 3000 (Revised) and applies to our Scope 1 and Scope 2 emissions, as well as upstream Scope 3 categories, including business travel, purchased goods and services, capital goods, fuel- and energy-related activities, Upstream transportation and distribution, waste generated in operations, employee commuting, and upstream leased assets as defined under the GHG Protocol Corporate Value Chain (Scope 3) Standard.

The decision to pursue external assurance was driven by:

- The need to validate the integrity of our carbon baseline, which serves as the foundation for our long-term decarbonisation trajectory.
- Internal readiness following the consolidation of GHG data across operational boundaries and value chain interfaces.
- Stakeholder expectations for externally verified disclosures in alignment with frameworks such as the SBTi and CDP.

The assurance process included detailed review of our emissions calculation methodologies, emissions factors (sourced primarily from UK Government GHG Conversion Factors for Company Reporting), data management controls, and evidence trails. Findings from the limited assurance engagement have informed improvements to our internal GHG reporting processes, including enhanced documentation, formalised QA/QC procedures, and expanded data governance controls.

This represents a key inflection point in our ESG reporting maturity. We plan to maintain annual assurance going forward, with a view to increase the level of assurance (e.g. moving from limited to reasonable assurance).

2.2 Resource Management

Efficient and responsible resource management remains a key pillar of our sustainability strategy at Wilson James. This section outlines our commitment to advancing circular economy principles across our operations, with a focus on reducing waste, increasing recycling, and maximising the value of materials through reuse.

We recognise that effective resource use is not only essential for minimising environmental impact, but also for delivering operational resilience and long-term value.

Our approach is pragmatic and outcomes-driven, shaped by the realities of complex logistics and site operations, yet firmly aligned with industry best practice and evolving sustainability standards.

Through targeted initiatives and collaborative partnerships, we are actively identifying and implementing opportunities to prevent waste and extend the lifecycle of materials. This includes the redistribution of surplus assets via Globechain, the introduction of a PPE recycling scheme to reduce single-use items, and our work with The Pallets Yard to enable the reuse of timber across major infrastructure projects.

The case studies that follow demonstrate the tangible impact of these efforts and our broader ambition to embed circularity into the way we operate, helping to reduce our environmental footprint while supporting our clients' sustainability goals.

2.2.1 Driving Pallets Reuse from Heathrow Infrastructure Projects – The Pallets Yard Case Study

Creating positive impact in the communities where we operate is central to Wilson James' approach to responsible business. A shared commitment to local economic empowerment between Wilson James and HAL provided the foundation for a meaningful business relationship with The Pallets Yard, formed at the 2023 Heathrow Business Summit.

HAL's ongoing strategy to integrate SMEs into its supply chain underpins this collaboration, aiming to drive economic opportunity for local businesses while improving environmental outcomes. The Pallets Yard, an SME that purchases used wooden pallets for resale and reuse, offered a compelling opportunity to elevate waste materials up the hierarchy, from recycling to reuse.

Objectives

- Support local economic growth by engaging SMEs within HAL's supply chain.
- Enhance sustainability outcomes by prioritising reuse over recycling for used wooden pallets.

Approach/Execution

Our implementation strategy followed a structured four-step roadmap:

- Design a logistics plan to consolidate used pallets from HAL infrastructure projects.
- Engage and upskill The Pallets Yard to meet reporting and sustainability requirements.
- Conduct a pilot to assess feasibility and refine the process.
- Roll out the scheme across the broader HAL infrastructure community.

Logistics Plan

The solution was built on a reverse logistics model, optimising existing vehicle movements between our Consolidation Centre and HAL infrastructure sites. Materials are delivered to site using a just-in-time approach, and return trips are used to collect used wooden pallets for consolidation. Once a threshold of 60 pallets is reached, a collection is triggered for reuse by The Pallets Yard. This method eliminates the need for dedicated transport, thus reducing emissions and enhancing vehicle efficiency.

Engagement & Upskilling

Working with SMEs often presents challenges around sustainability reporting, largely due to limited internal resources or expertise. To address this, our Environment & Sustainability Manager delivered a tailored series of workshops for The Pallets Yard. These sessions covered:

- The environmental impact of carbon emissions
- Basic carbon accounting principles aligned with the GHG Protocol
- The importance of sustainability data for integration into major supply chains

This engagement enabled The Pallets Yard to generate post-collection carbon savings reports, a key requirement of the scheme.

Pilot Phase

The pilot ran for three months and involved four key delivery partners: Mace, Ferrovial, Volker Fitzpatrick, and Costain. During this phase, the logistics, pallet management, and reporting processes were tested and optimised. This allowed the scheme to be refined in a controlled environment before wider adoption.

Full Roll-Out

Following the successful pilot, the scheme was rolled out across the entire HAL infrastructure community. A targeted communications campaign was launched, including:

- Clear guidance on pallet criteria and storage
- Call-off procedures and minimum collection thresholds
- Visual signage and engagement with site managers

This ensured standardisation across project sites and improved consistency in pallet management and reuse.

Result/Outcomes

- **Reuse:** 643 pallets diverted from waste to reuse, saving over 13 tonnes of timber
- **Carbon Savings:** c. 300 kgCO2e avoided emissions through reuse
- **Cost Benefit:** £2,000 from pallet resale and avoided disposal costs
- **Resource Efficiency:** 13 tonnes of virgin timber resource use avoided
- **Social Value:** Local SME successfully onboarded into HAL's supply chain, strengthened SME capabilities in sustainability reporting, and opened doors for future collaborations with Tier 1 suppliers.

Lessons Learned – Key Takeaways

SME capacity building is critical: Tailored support and knowledge transfer significantly enhanced The Pallets Yard's ability to meet sustainability requirements, improving their long-term readiness to work with other major clients.

Reverse logistics drives efficiency: Utilising existing vehicle movements for pallet collection maximised resource use and minimised carbon impacts.

Pilot-to-scale approach is essential: Running a contained pilot phase helped identify and resolve logistical and operational challenges before broader implementation.

Communication is key: Early and clear communication with delivery partners helped standardise procedures and ensure smooth adoption across diverse infrastructure projects.

Looking Ahead

Following the success of the scheme at Heathrow, we plan to replicate and scale this approach across other infrastructure logistics contracts. We are also exploring opportunities to extend the reuse model to additional waste streams such as cable drums, timber offcuts, and redundant plant equipment—amplifying both environmental and social value outcomes across our operations.

2.2.2 Sustainable Material Management – The Globechain Case Study

Overview

As part of our commitment to embedding circular economy principles across our Heathrow operations, Wilson James partnered with Globechain, the UK's leading ESG reuse marketplace, to maximise the offsite reuse of surplus construction materials.

By leveraging our annual warehouse clearance process and integrating it into our intelligent material and logistics management system (Fulcrum), we created a low-friction, high-impact solution that aligns with Heathrow Airport Limited's sustainability ambitions and the UK waste hierarchy.

Context

Construction projects across Heathrow Airport often generate surplus materials, either due to changes in design scope, over-ordering, or works completion. Without a structured reuse strategy, such materials historically risked being treated as waste, despite having residual value and utility.

Recognising this, Wilson James sought to transform these materials from end-of-life waste streams into valuable community resources, while also freeing up operational space, improving material stewardship, and reducing environmental impact.

Approach

Annual Warehouse Inventory Rationalisation

Wilson James conducts an annual warehouse clearance at our Colnbrook consolidation centre. In preparation, we carry out a full inventory review of materials stored onsite using our Fulcrum logistics and material management system. This digital platform enables real-time categorisation, tracking, and condition assessment of all materials within our warehouse ecosystem.

Partner Engagement & Residual Value Assessment

The next step in the reuse process involves engaging delivery partners and stakeholders with a shared material inventory. This provides them an opportunity to:

- Review available items,
- Assess relevance for ongoing or upcoming site needs,
- Schedule priority collections within a defined timeframe.

This proactive step ensures that items with potential on-site reuse are retained and redistributed internally, further reducing unnecessary procurement and waste.

Team Upskilling

To ensure seamless implementation and sustained success, Wilson James conducted dedicated training sessions for relevant site-based teams on how to use the Globechain platform. Training included:

How to list surplus items correctly (images, descriptions, categorisation).
Compliance and quality expectations.
Monitoring and responding to collection requests.

Empowering operational teams with platform knowledge not only decentralises responsibility but also embeds reuse behaviours into our day-to-day site practices.

External Redistribution via Globechain

Following the partner engagement window, all remaining materials deemed surplus are systematically listed on Globechain by the Wilson James team. Each listing includes item details, condition, quantity, and images.

Interested third-party organisations (typically charities, social enterprises, schools, and community groups) can then claim these items via the Globechain platform and collect them directly from site.

This process:

- Removes the need for bespoke transportation arrangements,
- Keeps logistics friction low,
- Extends the lifecycle of valuable materials into the community.

2024 Outcomes and Impacts

Over the past year, our Globechain integration at Heathrow has delivered the following tangible benefits:

Key Metrics Impact

- Items Collected – 306
- Weight Diverted from Waste – 491 kg
- CO2e Emissions Deferred ~5.15 tonnes
- Individuals Benefited – 123
- Social Value Generated – £14,490
- Proportion of Collections Supporting Employment & Upskilling – 30.8%
- Proportion of Items Reused vs Resold – 92.3% Reuse

Top Reused Categories

- Insulation
- Floor Tiles
- Ceiling Lights
- Cabinets
- Chillers
- Storage

Top Impact Sectors: Social care, arts, education and training.

UNSDGs Impacted

- Quality Education
- Decent Work and Economic Growth
- Reduced Inequalities
- Sustainable Cities and Communities
- Good Health and Well-being

Lessons Learned

- **Digital systems enable accountability:** Fulcrum's inventory capabilities provided the visibility and traceability needed to identify and prepare items for reuse efficiently.
- **Training is critical to scaling reuse:** Empowering site teams with the knowledge and tools to manage listings directly has accelerated adoption and embedded circular thinking at the operational level.
- **Collaboration is key:** Early engagement with delivery partners allows for smarter material circulation within the airport estate before considering offsite redistribution.
- **No added complexity:** By aligning reuse with existing processes, and leveraging platforms like Globechain, sustainability outcomes can be achieved without operational disruption.
- **Partnerships amplify impact:** Combining internal redistribution with Globechain's external network creates a dual-path reuse model that minimises waste and maximises social benefit.

Conclusion

This initiative demonstrates how Wilson James has operationalised circular economy principles through smart integration of digital systems, supplier engagement, and workforce training. By aligning our annual clearance cycle with Globechain's platform and reinforcing it with internal capability-building, we have created a scalable model for sustainable logistics that benefits both the environment and the wider community.

2.2.3 PPE Recycling Case Study

In line with the UK's waste hierarchy and Heathrow Airport Limited's (HAL) sustainability ambitions, Wilson James continually seeks to move waste materials up the hierarchy, from disposal to reuse and recycling.

Previously, used personal protective equipment (PPE) from HAL infrastructure projects was treated as residual waste and sent for Refuse-Derived Fuel (RDF) incineration. While preferable to landfill, RDF still produces greenhouse gas emissions, air pollutants, and results in the permanent loss of material value.

Following the success of our wooden pallet reuse scheme with The Pallets Yard, we identified an opportunity to apply the same reverse logistics model to PPE waste. By refining internal processes rather than investing in new infrastructure, we designed a scheme that redirected used PPE from incineration to recycling, using existing vehicle routes and clear site-level guidance.

Where the Pallets Yard scheme laid the foundation for reverse logistics and circular practices, the PPE scheme demonstrated how these principles could be rapidly embedded into routine operations to deliver faster and more efficient environmental gains.

Objectives

- Divert used PPE from energy recovery (RDF) to recycling, in line with the waste hierarchy.
- Apply reverse logistics principles to maximise transport efficiency and reduce emissions.
- Build on previous lessons to streamline process design and execution.
- Ensure site-level compliance with duty of care and waste segregation requirements.

Leveraging Lessons Learned for Smarter Delivery

The Pallets Yard scheme provided a valuable testbed for collaborative waste recovery solutions, revealing several operational success factors:

Lesson Learned from Pallets Yard	Application in PPE Recycling Scheme
Reverse logistics drives efficiency	Applied the same reverse logistics model to PPE collection using return vehicle journeys from HAL sites to our Colnbrook Consolidation Centre, eliminating the need for dedicated transport.
Pilot-to-scale approach builds confidence	Having validated the model with pallets, we accelerated rollout for PPE without a pilot, streamlining time-to-implementation.
Early and clear communication is critical	Internal training and communications were front-loaded to ensure our site teams understood the revised process and their responsibilities from day one.
Process standardisation is key	Adopted standardised call-off procedures, logistics processes, and data capture processes to ensure consistent execution.

Process Design & Implementation

Unlike the pallet reuse scheme which required SME onboarding and capacity building, the PPE recycling scheme focused entirely on internal process refinement. The approach included:

Logistics Plan

PPE sacks are returned via existing vehicle movements to the Colnbrook Consolidation Centre. Once a threshold volume is reached, specialist recycling partner Avena is called in to collect and recycle the material.

Internal Training & Compliance

We trained logistics and site teams on:

- Correct segregation of PPE
- Appropriate documentation to meet duty of care requirements
- Reverse logistics principles to ensure efficient vehicle use
- Call-off procedures for timely collections

Operational Roll-Out

With no pilot needed, the scheme was deployed across all active HAL infrastructure sites as a standard practice. This was enabled by the maturity of our internal systems and previous learnings.

Results & Outcomes

- **Volume Diverted:** 76 full sacks of used PPE successfully diverted from RDF (incineration) to material recycling.
- **Natural Resource Conservation:** Reduced demand for virgin plastic feedstock, contributing to the conservation of fossil resources and reduction in upstream extraction impacts.
- **Air Quality Improvement:** Avoided the combustion-related release of pollutants such as particulate matter, NOx, and dioxins, thereby supporting cleaner air around waste management and processing facilities.
- **Energy Efficiency:** Delivered significant energy savings, with recycling requiring up to 88% less energy compared to virgin plastic production, reducing indirect emissions from energy generation.
- **Waste Hierarchy Compliance:** Elevated used PPE higher up the waste hierarchy from energy recovery to recycling, in alignment with UK environmental policy and ISO 14001 principles.
- **Hazard Avoidance:** Eliminated the generation of toxic incineration residues such as fly ash and bottom ash that require specialist disposal.
- **Operational Efficiency:** Maintained emissions-neutral collections using return logistics from active HAL sites to our Colnbrook Consolidation Centre.
- **Internal Capability:** Strengthened site-level understanding of duty of care and improved compliance with environmental handling and documentation standards.

Conclusion

This scheme exemplifies how knowledge transfer and operational learning can improve efficiency, reduce lead time, and enhance environmental outcomes. By applying the proven model from The Pallets Yard and skipping the pilot phase, we saved time, cut emissions, and embedded recycling into our logistics model with minimal disruption.

Looking Ahead

Encouraged by this success, we are now exploring the expansion of the PPE recycling model to include additional items like uniforms from our assistance program across UK airports. We are also evaluating the extension of this approach across other contracts, where reverse logistics can support circular economy outcomes with minimal cost and maximum efficiency.

3.0 People

At Wilson James, our people are the driving force behind everything we do. As a service-based business, our ability to deliver safe, reliable, and quality services is wholly dependent on the character, skill, and commitment of our workforce. We are proud to operate across complex environments; aviation, construction, healthcare, logistics, and critical infrastructure, where the professionalism of our people remains our most valuable asset.

Our People pillar is rooted in a clear strategic ambition: to build a workforce that reflects the communities we serve, to create opportunities that empower individuals, and to ensure that inclusion is not just a principle but a daily practice. In 2024, our approach to people was delivered through four interconnected workstreams: volunteering and community engagement, skills and inclusive employment, employee networks, and equity, diversity, and inclusion (EDI).

3.1 Volunteering and Community Engagement

3.1.1 Volunteering

As part of our broader social value strategy, we are shifting towards a more outcomes-focused volunteering model, one that not only tracks hours volunteered but also captures the tangible community benefits delivered through our efforts. This shift is underpinned by the launch of our new Volunteering Policy, which offers all salaried employees two days of paid volunteering leave per year.

The policy encourages staff to contribute their time and skills to causes aligned with Wilson James's social value priorities, ensuring greater alignment between individual action and organisational purpose.

In 2024, we recorded 83 volunteering hours, with the majority focused on biodiversity conservation through partnerships with local environmental charities. Key initiatives included:

- Habitat restoration and green space enhancement with Green Corridor
- Conservation activities with the British Airways Angling Society
- Environmental maintenance and community engagement at Hounslow Heath

These efforts not only supported the regeneration and preservation of local ecosystems but also provided our employees with meaningful opportunities to connect with the communities we serve and the environments we impact.

As we move forward, we will continue to embed volunteering as a core component of our social value delivery – with future reporting structured to capture both quantitative inputs and qualitative outcomes.



Figure 1 Heathrow Logistics Integration Team Volunteering at the Green Corridor

3.1.2 Logistics Support with the London Titans

Over the last few years, we have worked with the London Titans, an organisation that focuses on making basketball events accessible to people with disabilities while raising awareness around disability and other health related issues in the community.

Some key events we supported over the course of 2024 include their GOSH Get Active Day and Heathrow Airport's Charity Event in collaboration with the London Titans. Our support took the form of transporting wheelchairs and other supplies to and from the event venues, with over 500 direct and indirect beneficiaries across the 2 events.

Our extensive logistics infrastructure enables us to support local communities beyond our core operations. One way we do this is by offering logistics support to local charities, helping them reduce operational costs and deliver greater impact through their events and initiatives.

Over the past few years, we've built a meaningful relationship with London Titans, an organisation dedicated to making basketball accessible for individuals with disabilities while also raising awareness around wider health and disability-related issues within the community.

In 2024, we supported several key events in partnership with the London Titans, including:

- GOSH Get Active Day, an initiative promoting physical activity for children receiving care through Great Ormond Street Hospital
- Heathrow Airport's Charity Event, delivered in collaboration with the London Titans to raise awareness and support for inclusive sports

For both events, we provided end-to-end logistics support, including the transportation of wheelchairs and essential equipment to and from event venues. Through this support, we helped ensure that accessibility needs were met efficiently and safely, enabling full participation.

Our contribution directly and indirectly benefited over 500 individuals, including participants, their families, volunteers, and event organisers, reinforcing our belief that logistics can be a powerful enabler of community inclusion.



Figure 2 Supporting the London Titans at Heathrow Airport Limited's Charity Event



Figure 3 Supporting the London Titans at Heathrow Airport Limited's Charity Event

3.2 Apprenticeships

Apprenticeships remain a cornerstone of our commitment to economic empowerment and inclusive employment. As a service-based business operating across critical infrastructure, we recognise the importance of accessible training pathways that enable people to gain valuable qualifications, develop in-demand skills, and progress within our organisation.

In 2024, we continued to expand our apprenticeship offer, strengthening relationships with clients and training providers while opening doors to new and existing talent across our contracts. By year-end, we were supporting:

- 78 active apprentices, with
- 46 new apprenticeship starts and
- 10 completions, many of whom have progressed into permanent roles within Wilson James

These apprenticeships span security, logistics, and construction environments, offering real-world experience in operational settings while delivering accredited qualifications. In many cases, these roles are filled by individuals from groups underrepresented in our industry, supporting our wider inclusion goals.

New partnerships were launched across several high-profile contracts, including:

- 2 apprentices placed with housing association L&Q,
- 3 security apprentices placed at Southend Hospital, and
- 2 logistics apprentices working on the Wates contract

All apprentices are supported by structured learning frameworks, and we continue to explore ways to enhance progression planning and mentoring support to maximise retention and long-term impact.

Apprenticeships not only strengthen our talent pipeline, but they also help us create lasting social value by equipping individuals with skills that extend beyond Wilson James. As we move into 2025, we aim to embed clearer impact tracking mechanisms to better understand apprentice outcomes and scale up our reach across contracts and service areas.

3.3 Work Experience

Work experience forms a vital part of our commitment to inclusive employment and early career access. In 2024, we took significant steps to formalise and scale our approach, ensuring that work placements across Wilson James provide meaningful development opportunities – particularly for individuals from underrepresented backgrounds or those facing barriers to employment.

This year, we introduced a formal Work Experience Policy, developed in collaboration with operational leaders and support teams. The policy outlines the expectations, structure, and safeguarding measures required to deliver consistent, inclusive, and impactful work experience placements across our business. It also serves as a foundation for tracking participation and outcomes going forward.

A flagship example of our commitment to inclusive placements was the launch of a new supported internship programme at Heathrow, delivered in partnership with Green Corridor, a charity specialising in SEND (Special Educational Needs and Disabilities) support. The programme was designed to provide autistic young people with a structured, safe, and empowering experience in a live operational environment. Participants were supported by tailored learning plans, job coaches, and workplace adjustments to help them build confidence and employability skills.

In addition to the Heathrow programme, we supported several other placements across different sectors and contracts, including:

- A work experience placement in Manchester facilitated by our Construction Logistics team
- A placement within the Security team at the Francis Crick Institute
- Participation in career talks and site visits in collaboration with schools and community outreach partners

Our focus on SEND and supported placements reflects our strategic goal to create fairer access to employment and contribute to breaking cycles of disadvantage. These experiences not only benefit participants but also create learning opportunities for our own teams, helping build inclusive leadership skills and greater confidence in supporting neurodivergent and disabled colleagues. Looking ahead, we will continue working with internal stakeholders and specialist partners to expand our work experience offering, improve measurement of its impact, and ensure these opportunities are embedded into operational delivery across contracts.

3.3.1 Supporting Neurodivergent Learners – The Green Corridor Case Study

As part of our broader commitment to fostering an inclusive and equitable workplace, we continue to explore ways to embed diversity and inclusion into every aspect of our operations, including how we support early career development and access to meaningful work experience. In partnership with Green Corridor, a specialist education provider supporting young people with learning difficulties and autism, we identified a critical gap in the opportunities available to their learners. Despite completing structured vocational programmes, many learners were not gaining exposure to live operational environments, often due to perceived health and safety risks and a lack of inclusive workplace practices.

Recognising this as both a barrier to progression and an opportunity to drive impact, we co-designed a pilot work experience programme tailored specifically to support an autistic learner within our Colnbrook Logistics Centre, one of our key operational sites.

Before the placement began, we worked closely with Green Corridor to ensure that every necessary safeguard was in place:

- We delivered interactive workshops with on-site staff focused on neurodiversity awareness, communication styles, and inclusive behaviours.
- We resourced the programme with clearly defined task structures to reduce ambiguity and provide consistency.
- We carried out comprehensive health and safety risk assessments, with adjustments made to prioritise the wellbeing and confidence of the learner throughout the five-week programme.

The pilot not only provided the learner with invaluable exposure to a real-world logistics environment but also enabled our teams to build confidence in creating psychologically safe, inclusive spaces for neurodivergent individuals.

Following the success of the pilot, the programme has now been formalised, with a broader range of roles and new learners being introduced into the scheme.



Figure 4 Green Corridor Learner (Mitchell) and the Wilson James Team at our Colnbrook Logistics Centre

Wider Impact and Alignment with the UNSDGs

This initiative exemplifies our contribution to:

UNSDG 4 – Quality Education: By bridging the gap between vocational learning and practical experience, we support a more inclusive model of lifelong learning and skills development.

UNSDG 8 – Decent Work and Economic Growth: We promote inclusive work placements that provide real pathways into employment for those typically underrepresented in the labour market.

UNSDG 10 – Reduced Inequalities: By proactively removing systemic barriers for neurodivergent young people, we are helping to build a fairer, more accessible world of work. Ultimately, this work reflects our belief that inclusion is not just a value – it's a practice. And it's only through intentional, people-centred action that we can drive meaningful change.

3.4 Employee Wellbeing

In 2024, our wellbeing efforts focused on three key areas: raising awareness of key issues, improving accessibility of support, and equipping managers to better respond to the needs of their teams.

Our approach is guided by the understanding that wellbeing is multidimensional, encompassing mental, physical, emotional, and financial health. We take a proactive stance in helping colleagues navigate these areas through campaigns, toolkits, and support resources.

Throughout the year, our People Team supported a wide range of internal awareness activities and national observances including:

- Time to Talk Day
- Mental Health Awareness Week
- World Suicide Prevention Day

These campaigns were delivered through a combination of internal communications, lived experience stories, and practical signposting to support services. All content was tailored to be accessible across both frontline and office-based teams.

Recognising the importance of manager capability in shaping a healthy working environment, we continued to develop wellbeing-focused learning materials for frontline managers, often in collaboration with our employee networks. These resources aimed to equip managers with tools to identify early signs of distress, signpost appropriately, and create psychologically safe team environments.

Our employee networks also played a significant role in wellbeing this year, particularly the Disability and Carers Network, which co-created new resources to support both physical and mental health needs.

While we do not yet collect formalised wellbeing data across the business, we recognise the importance of measuring the effectiveness of our interventions and are exploring mechanisms to do so more systematically in the future.

Looking ahead, we aim to strengthen our wellbeing offering by embedding wellbeing into leadership development, enhancing visibility of available resources, and ensuring inclusive access to support – regardless of role, location, or contract.

3.5 Equality, Diversity & Inclusion

Equity, Diversity and Inclusion (EDI) remain a foundational pillar of our People strategy at Wilson James. As a business operating across diverse communities and critical infrastructure sectors, we understand the importance of cultivating a workforce that reflects the society we serve, and ensuring all colleagues feel valued, respected, and empowered.

In 2024, our EDI work focused on embedding inclusive practices across the entire employee lifecycle. This included reviewing recruitment language, strengthening training for managers, improving internal engagement, and beginning to collect richer data on colleague demographics and experiences.

Key areas of progress included:

- **Inclusive policy and process reviews:** We collaborated with our HR, Talent, and Communications teams to review key people processes and ensure accessibility, inclusive language, and alignment with best practice. This included updates to internal policies and adjustments to job advertisements and onboarding procedures.
- **EDI training and capability building:** We continued to develop and deliver EDI-focused learning content for both head office teams and frontline operational managers. These learning pathways are designed to build confidence and capability in recognising bias, supporting inclusive leadership, and creating psychologically safe environments.
- **Awareness and engagement campaigns:** In addition to the work delivered by our employee networks, we supported a wide range of internal campaigns aligned with national observances (e.g. Race Equality Week, Mental Health Awareness Week, International Women's Day). These campaigns helped stimulate conversations, raise visibility, and signal our commitment to building an inclusive culture at every level.
- **First EDI pulse survey:** In 2024, we launched our first EDI pulse survey to better understand the lived experiences of colleagues and to establish a data baseline. The survey has provided valuable insight into perceptions of inclusion, psychological safety, and representation. These findings will help shape future actions and inform more targeted interventions.

While we are early in our data journey, we acknowledge the importance of capturing meaningful diversity data to inform decision-making and track progress. In 2025, we aim to improve the consistency and completeness of demographic data across our systems, while continuing to engage colleagues in conversations about trust, transparency, and the value of self-identification.

Our approach to EDI is not a standalone programme, it is woven into our values, embedded in our leadership expectations, and central to how we hire, develop, and support our people.

Our organisational efforts to embed equity, diversity and inclusion are greatly enhanced by the energy, insight and leadership of our colleague-led networks. These networks translate strategy into lived experience, bringing EDI to life through grassroots engagement, peer support, and targeted campaigns that reflect the voices of our workforce. As we continue to build inclusive systems and policies, our networks play a vital role in shaping the culture and driving the behavioural change needed to make inclusion meaningful and sustainable.

3.5.1 Gender Network

The Gender Network aims to create an inclusive platform for all colleagues regardless of gender identity to explore issues of equity, visibility, and representation across the workplace. The network recognises that gender equity is not solely a women's issue but a shared responsibility that benefits from allyship, intersectional dialogue, and collective action.
In 2024, the Gender Network focused on expanding its reach and relevance while maintaining a strong emphasis on cultural education and support. It delivered targeted campaigns to raise awareness, break down stereotypes, and provide space for authentic discussion about gender in the workplace.
Key initiatives included:

- International Women's Day celebrations, with internal campaigns that spotlighted colleague stories and highlighted the achievements of women across Wilson James
- A campaign on menopause awareness, including resources and storytelling to normalise conversations and improve manager understanding
- Consultation on internal policies, including flexible working and HR frameworks, to ensure gender-sensitive language and inclusive design
- Engagement across frontline and office-based teams to expand network visibility and participation

The Gender Network continues to evolve in both scope and ambition, reflecting the shifting conversations around gender identity, caregiving, leadership representation, and workplace equity. As we move forward, the network will continue to serve as a key driver of inclusion, championing policies and culture that support the wellbeing and progression of all colleagues, across the gender spectrum.

3.5.2 Disability Network

The Disability Network exists to support colleagues with visible and non-visible disabilities, long-term health conditions, and caring responsibilities. Through its campaigns, partnerships, and policy input, the network challenges stigma, promotes psychological safety, and ensures that disability inclusion is embedded in both our culture and our operations.

In 2024, the network delivered a rich and impactful calendar of activity designed to raise awareness, build empathy, and drive meaningful improvements across the business. Its work reflected the lived experiences of our people and connected directly to the environments in which Wilson James operates – particularly at major UK airports, where we play a frontline role in assisting passengers with reduced mobility (PRM).

One standout campaign was International Wheelchair Day, which highlighted the barriers faced by wheelchair users in everyday and travel environments. This campaign had resonance across our airport contracts, where accessibility, dignity, and proactive support are essential to the customer experience. Through compelling narratives and practical insights, the campaign strengthened awareness among operational teams and reinforced our commitment to inclusive frontline service.

The network also launched a puppy training initiative in partnership with Dogs for the Blind, supporting future guide dogs and using the initiative to raise awareness of the challenges faced by individuals with visual impairments. This not only helped colleagues understand the long-term nature of accessibility needs but also connected them to the human impact of inclusive service delivery.



Figure 5 Dogs for the Blind Puppy Training

In total, the Disability Network delivered four major campaigns, including:

- Disability History Month
- World Down Syndrome Day
- Autism Awareness Month
- ADHD Awareness Month

These initiatives shared lived experience stories, explained the reality of both visible and invisible conditions, and normalised discussions around disability, neurodivergence, and mental health in the workplace. Campaigns were supported by digital communications, posters, and dedicated resources, reaching teams across both office and operational sites.

In a consultative capacity, the network:

- Advised on the design of the Heathrow SEND work experience programme, ensuring it met the needs of autistic young people
- Helped review recruitment materials to support more inclusive language and neurodivergent-friendly formats
- Co-developed mental health and wellbeing resources for line managers, improving confidence in providing appropriate support
- Provided input into the review of volunteering and flexible working policies, ensuring they reflect the needs of those managing health conditions or caring responsibilities

Across these efforts, the network engaged over 250 colleagues and continued to push for a culture that recognises disability not just as a compliance issue, but as a lived reality that must be actively supported through policy, training, and empathy.

As we look ahead, the Disability Network will continue to play a pivotal role in influencing inclusive design, driving awareness, and ensuring our colleagues, particularly those in demanding, customer-facing roles have the understanding, confidence, and tools to support one another and the communities we serve.

3.5.3 Race Network

The Race Equality Network was established to provide a platform for honest conversations, representation, and advocacy on race and ethnicity across Wilson James. The network continues to drive positive change by elevating the voices of racialised colleagues, celebrating culture and identity, and holding space for reflection and learning.

In 2024, it played a leading role in delivering a powerful campaign calendar while actively contributing to recruitment, communications, and EDI policy development. The network focused on visibility, education, and behavioural change – ensuring that anti-racism is not a standalone message but embedded across our operational and leadership culture. Key achievements during the year included:

- Delivery of six awareness campaigns, including Race Equality Week, Windrush 75, and Black History Month, all supported by colleague stories and external resources
- Launch of the "No Room for Racism" initiative, developed in collaboration with internal communications and now adopted across multiple client sites
- A strategic review of inclusive language across recruitment materials, in partnership with HR and Talent teams
- Contribution to the design of internal communications and learning content focused on racial inclusion
- Engagement with over 600 colleagues through a mix of digital campaigns, in-person events, and printed materials

The network's pursuit is not only impactful in terms of participation, but also helping reshape how we talk about race, how we design inclusive recruitment pathways, and how we equip managers and teams to address racism and bias with confidence and accountability.

The network remains a critical voice in ensuring our systems, behaviours, and culture reflect our commitment to equity and representation. It will continue to inform decision-making across the business and support the delivery of our future People Strategy and EDI KPIs.



Figure 7, Holi at Westcliff Head Office

3.5.4 LGBTQ+ Network

The LGBTQ+ Pride Network exists to create a safe, visible, and inclusive space for lesbian, gay, bisexual, trans, queer, and other LGBTQ+ colleagues and allies across Wilson James. The network's mission is rooted in visibility, education, and support aiming to challenge stigma, celebrate identity, and foster allyship across all areas of the business.

In 2024, the network delivered a wide-reaching programme of activity focused on awareness-raising, capability-building, and increasing the visibility of LGBTQ+ inclusion across both frontline and office-based teams.

Key achievements this year included:

- Delivery of five internal campaigns, including activities for Pride Month and Trans Awareness Week
- Development and rollout of a Pride Allies Toolkit, distributed to over 100 team leaders to support everyday allyship and inclusion
- Visibility initiatives delivered across aviation and security contracts, including on-site communications and branded campaigns
- Engagement with over 400 colleagues through digital resources, events, and educational content

The Pride Network continues to play an essential role in shaping inclusive policy, fostering open conversations, and providing peer support to colleagues navigating their identities at work.

Its efforts also contribute to improving the confidence of managers and teams in addressing LGBTQ+ issues sensitively and respectfully. As we continue to evolve our People Strategy and embed inclusion across the employee experience, the Pride Network will remain central to driving cultural change and building a workplace where everyone can bring their whole selves to work without fear or compromise.

3.6 Looking Ahead

In 2025, we will build on the momentum established across our People initiatives by embedding greater structure, consistency, and impact measurement into everything we do. Our goal is to ensure that inclusive employment, wellbeing, and workforce development are not only embedded in policy but meaningfully experienced by colleagues across all roles and locations.

Key priorities for the year ahead include:

- Improving data and impact tracking across apprenticeships, work experience, and volunteering to better evidence outcomes and social value generated
- Expanding access to inclusive opportunities through the formalisation of placement pathways and the continued development of supported internships
- Enhancing the visibility and influence of employee networks, ensuring their insights continue to shape policy, engagement, and leadership development
- Strengthening wellbeing support by embedding resources into core leadership training and increasing accessibility of signposting tools for all colleagues
- Deepening EDI integration across the employee lifecycle, including in recruitment, onboarding, and progression frameworks

These actions are aligned with our draft ESG strategy and broader People Strategy, both of which aim to deliver a more equitable and supportive workplace. We recognise that delivering meaningful impact requires sustained effort and accountability, and we are committed to reporting transparently on our progress as we move forward.

As we continue to evolve, our focus remains clear: creating a workplace where everyone can thrive, contribute, and grow.



Figure 8 Wilson James at London Pride 2024

4.0 Performance

Sustainability performance is not just about setting goals; it's about putting the right structures in place to deliver them. Effective governance is the backbone of how we translate ambition into action, embedding accountability, ethical conduct, and continuous improvement across the business. This section highlights how we are strengthening our sustainability performance through clear governance mechanisms and strategic alignment. It covers:

- Our policy-led approach to ethics and responsible business conduct, ensuring high standards of integrity, transparency, and compliance
- Our engagement with key disclosure frameworks, including EcoVadis, CDP, and ESOS, to benchmark progress and identify areas for targeted improvement
- Our plans for 2025 and beyond, including the rollout of steering groups and cross-functional working groups to drive coordinated, measurable action across ESG priorities

Together, these efforts ensure that sustainability is not treated as a standalone initiative, but as a core component of how decisions are made, risks are managed, and long-term value is delivered.

4.1 Responsible Business Ethics

At Wilson James, we recognise that ethics and sustainability are fundamentally interconnected. Responsible business conduct is not just about legal compliance; it is about building trust, protecting people, and making decisions that stand up to scrutiny over the long term. Ethical behaviour underpins our ability to deliver on our sustainability commitments, whether in relation to climate action, human rights, social value, or good governance.

Our approach is anchored in a policy-driven framework that sets clear expectations for how we act as individuals, teams, and as a business. Through robust policies covering ethics, anti-bribery and corruption, fair competition, modern slavery, safeguarding, and responsible procurement, we ensure that our values are consistently applied across all operations and relationships.

This policy infrastructure provides more than just guardrails. It enables us to embed ethics into the fabric of our culture and decision-making. It ensures that our sustainability ambitions are matched by integrity in how we pursue them, and that we remain accountable not only for what we achieve, but how we achieve it.

Grounded in clear procedures and reinforced by regular training, risk management, and leadership oversight, our ethical framework ensures that responsible conduct is not only encouraged, but operationalised, shaping how we lead, how we do business, and how we engage with the world around us.

What follows is an overview of how our ethical commitments are lived out in practice, from transparent procurement and financial integrity to human rights, safeguarding, and speaking up safely.

4.1.1 Fair Dealing and Honest Conduct

We are committed to acting with integrity, honesty, and professionalism in everything we do. Our Ethics Policy makes clear that all employees are expected to avoid conflicts of interest, act conscientiously, and conduct themselves in a manner that upholds the company's reputation and values. We strictly prohibit the misuse of confidential information or influence for personal gain and expect our employees to maintain the highest standards of professionalism when dealing with clients, suppliers, and one another.

We actively discourage the solicitation or acceptance of gifts or hospitality that could be perceived as inducement or create the appearance of favouritism.

All supplier relationships are expected to be transparent, merit-based, and compliant with our ethical standards. We will not knowingly do business with individuals or organisations involved in unethical practices or human rights violations.

4.1.2 Anti-Bribery, Corruption, and Financial Integrity

Our Anti-Bribery and Corruption Policy reflect our zero-tolerance stance towards bribery and corruption in all forms. This applies not only to employees, but also to contractors, agents, and business partners acting on our behalf.

We prohibit the offering, soliciting, or accepting of any bribes, inducements, or unlawful financial advantages, whether in cash or kind. We have embedded controls across our business to prevent, detect, and report bribery risks including due diligence requirements for third parties, robust contract terms, and clear declarations of gifts and hospitality.

In line with the Criminal Finances Act 2017, our policies also require employees to report any suspicions of tax evasion or financial wrongdoing by third parties. All concerns are escalated to the appropriate internal authorities and may be reported to law enforcement if warranted.

4.1.3 Respecting Human Rights and Combating Modern Slavery

Respect for human rights is fundamental to how we do business. We are committed to identifying and mitigating the risk of modern slavery and human trafficking across our operations and supply chain. Our Modern Slavery Policy and Modern Slavery Statement outline the proactive steps we take to uphold this commitment.

These include:

- Conducting risk-based supply chain due diligence before onboarding new suppliers
- Regularly reviewing recruitment and vetting practices to prevent exploitation
- Providing mandatory training for managers and awareness training for all staff
- Launching supplier-facing tools such as our Supplier Code of Conduct and dedicated microsite
- Auditing high-risk categories and refining supplier controls based on risk insights

We take all allegations of modern slavery seriously and investigate them swiftly. Employees and suppliers are encouraged to report any concerns anonymously if needed through dedicated whistleblowing channels.

4.1.4 Safeguarding and Child Protection

Where our operations involve engagement with children or young people such as public-facing roles or community outreach initiatives, we take our safeguarding responsibilities extremely seriously. Our Child Protection Policy outlines clear expectations of staff, including working in open environments, maintaining appropriate boundaries, and acting promptly on any signs of neglect or abuse.

All employees are expected to be positive role models and uphold the rights, dignity, and welfare of young people always. Safeguarding training and escalation protocols are in place to ensure a consistent and effective response when concerns arise.

4.1.5 Promoting Fair Competition and Procurement Ethics

We uphold the principles of fair and lawful competition, as detailed in our Fair Competition Policy. We do not tolerate anti-competitive behaviour, collusion, or any practices that distort the market. Our commercial activity is conducted independently and lawfully, free from any abuse of market position or manipulation.

Procurement is guided by clear, ethical protocols that ensure best value is achieved through open competition and transparent processes. We operate a “zero tolerance” approach to procurement fraud, and staff involved in purchasing may be subject to declarations of interest and fraud awareness training.

4.1.6 Creating a Culture of Speaking Up

We actively promote a culture where concerns can be raised without fear of retaliation. Our Whistleblowing Policy supports employees, clients, and suppliers in reporting suspected ethical breaches or illegal behaviour, including misconduct, fraud, abuse, or human rights violations.

We provide multiple, confidential channels for raising concerns, including an independent reporting hotline. Reports are handled seriously, confidentially, and in line with formal investigation procedures. We are committed to protecting those who speak up in good faith.

4.1.7 Looking Ahead

As our business grows and the landscape evolves, we remain committed to strengthening our ethical culture. In the year ahead, we will:

- Continue delivering training on ethics, anti-bribery, and modern slavery across all functions
- Deepen supply chain engagement and auditing, especially in high-risk categories
- Review and update policies to reflect evolving legislation and stakeholder expectations
- Continue to invest in digital platforms that make it easier for colleagues and suppliers to access guidance and raise concerns

We understand that ethics is not a static checklist. It is an active commitment to doing the right thing, every day, in every decision. Through clear policies, strong leadership, and empowered people, we aim to uphold that commitment and build a culture of trust and accountability throughout Wilson James.

4.2 Disclosures

Transparent, credible, and consistent reporting is central to our sustainability journey. At Wilson James, we believe that disclosure is not just a compliance exercise. It is a tool for driving improvement, building trust with stakeholders, and holding ourselves accountable to the commitments we've made.

This section outlines our engagement with leading external disclosure frameworks, including:

- EcoVadis, where we assess and benchmark our performance across key areas such as environment, labour and human rights, ethics, and sustainable procurement.
- CDP, where we disclose our climate-related risks, impacts, and emissions data, and use the framework to identify opportunities for improving environmental performance.
- ESOS (Energy Savings Opportunity Scheme), through which we undertake mandatory energy audits to identify energy efficiency opportunities across our operations.

Each of these frameworks plays a distinct role in shaping our understanding of where we are today and informing the actions we take to improve tomorrow. Our disclosures are part of a wider commitment to continual progress and alignment with evolving expectations in sustainability governance, performance, and transparency.

4.2.1 EcoVadis Assessment

13th December 2024

Overall Score

Percentile | 46th

52 /100



Figure 7 2024 EcoVadis Scorecard

At Wilson James, we welcome every opportunity for transparency in reporting our sustainability performance, and so participating annually in the EcoVadis Sustainability Assessment affords us the opportunity to not only be transparent with our clients, but to also measure our year-on-year progress in a manner that is verified by external party which further adds credibility to our reporting.

Over the last 2 years, we have seen 10% improvement in our scoring across environment and sustainable procurement each. These improvements demonstrate our commitment to continuous improvement in the way we manage our environmental impacts and integrating sustainability into our supply chain.

4.2.2 Carbon Disclosure Project (CDP)

2024 marked a pivotal step forward in our CDP journey, not as our first year of disclosure, but as our most intentional and structured reporting year to date. Building on previous submissions, we approached this year with a renewed focus: to establish a robust baseline, critically assess our climate-related data and governance, and lay the groundwork for continuous performance improvement across our environmental disclosures.

This process has been invaluable in surfacing both strengths and development areas within our climate strategy and reporting framework. Through our 2024 disclosure, we identified several priorities/focus areas, including the need to better articulate our environmental dependencies and impacts, enhance our climate-related risk and opportunity processes, increase our energy performance with a focus on renewable energy procurement, strengthen our emissions reduction initiatives, and begin to incorporate low-carbon products and services into our operational planning.

Far from seeing these as shortcomings, we view them as strategic opportunities. They represent key levers through which we can drive credible climate action, inform better decision-making, and build long-term resilience. Our focus now is on turning these insights into action. From improving the granularity of our Scope 1 and 2 data to laying the groundwork for reduced reliance on proxy data for Scope 3 reporting and exploring targeted emissions reduction projects across high-impact areas.

Importantly, we see CDP as more than a disclosure platform, it is a catalyst for internal alignment and continuous improvement. It has helped us sharpen our understanding of what good looks like, challenge our internal assumptions, and start embedding climate considerations more deeply across the business.

As we move forward, our ambition is clear: to improve our CDP performance year-on-year, not for the sake of scores, but to ensure our climate response remains data-driven, transparent, and aligned with international best practice. The lessons learned from 2024 have equipped us with both the insight and the momentum needed to accelerate progress in the years ahead.

4.2.3 Energy Savings Opportunity Scheme (ESOS)

In 2024, we successfully complied with Phase 3 of the Energy Savings Opportunity Scheme (ESOS), following the completion of comprehensive energy audits across our operations and the formal submission of our ESOS report. This exercise has been instrumental in helping us better understand our energy consumption patterns and identifying tangible opportunities to improve efficiency, reduce costs, and lower emissions.



Figure 9, 2024 Energy Audit at the Colnbrook Logistics Centre (CLC)

Our Phase 3 energy audits provided a detailed picture of where and how energy is used across our estate and fleet and served as a key input in shaping our future energy and carbon reduction plans. As we prepare for the mandatory ESOS Phase 3 Progress Report in 2025, we are focused on converting audit insights into action, with a clear set of priority initiatives now in motion.

Some of the most promising opportunities identified through the ESOS process include:

- **Fleet electrification –** A phased transition towards electric vehicles across relevant parts of our operational fleet, supported by infrastructure and route planning improvements.
- **HVO transition –** Introducing Hydrotreated Vegetable Oil (HVO) as a low-carbon alternative in areas of our diesel fleet where electrification is not yet feasible.
- **Weatherstripping and insulation upgrades –** Improving thermal efficiency in buildings to reduce heating and cooling demand.
- **Energy audits and real-time monitoring –** Implementing more regular site-level audits and installing smart energy monitoring tools to better track usage and identify inefficiencies.
- **Occupancy sensors –** Rolling out occupancy-based lighting controls in offices and operational areas to reduce unnecessary energy use.

These initiatives are being integrated into our broader decarbonisation strategy and prioritised based on feasibility, impact, and alignment with our net zero objectives. The ESOS process has not only reinforced the business case for energy efficiency but also highlighted the importance of structured implementation and performance tracking to unlock the full value of these opportunities.

As we move toward the 2025 progress reporting deadline, we remain committed to demonstrating tangible follow-through on our ESOS findings ensuring that compliance is matched by action, and that energy efficiency becomes an embedded part of our operational culture.

4.3 2025 and Beyond

As we look to the future, the successful delivery of our sustainability strategy will rely not only on ambition, but on execution. Central to this will be the activation of our internal governance structures including our sustainability steering group and a series of cross-functional working groups to translate strategic intent into meaningful, measurable action across the business.

These forums will play a critical role in embedding sustainability into day-to-day decision-making, fostering shared accountability, and ensuring that progress is driven collaboratively across departments and operational areas.

By bringing together diverse perspectives, data, and expertise, we are creating the conditions for stronger alignment, faster problem-solving, and continuous year-on-year improvement in our sustainability performance. Through these mechanisms, we will accelerate the implementation of key initiatives, monitor delivery against our targets, and remain agile in responding to emerging risks, opportunities, and stakeholder expectations.

4.3.1 Sustainability Steering Group

As we move into the next phase of delivering our sustainability strategy, we recognise the need for stronger internal governance to support coordinated action and sustained performance improvement. To that end, we are in the process of establishing dedicated Sustainability Steering Groups to help embed ESG priorities across the business and ensure accountability at all levels.

These groups will bring together senior leaders and representatives from key functions including operations, procurement, HR, compliance, and communications to provide strategic oversight and drive cross-functional collaboration. The aim is to create a formal structure that supports implementation, accelerates decision-making, and keeps sustainability performance high on the agenda across all business areas.

Once in place, the Steering Groups will:

- Oversee progress against our ESG targets and key performance indicators
- Identify and help resolve delivery challenges
- Prioritise initiatives based on business impact and feasibility
- Facilitate the sharing of best practice across teams
- Ensure that sustainability is embedded in operational planning and strategic decisions

The establishment of these groups marks an important step in our maturity as an organisation – moving from commitment to structured delivery. By strengthening internal governance, we will be better positioned to track performance, respond to emerging risks and opportunities, and drive consistent, year-on-year improvement in our sustainability outcomes.

4.3.2 Cross-Functional Working Groups

In parallel with the formation of our Sustainability Steering Groups, we are also preparing to launch a series of Cross-Functional Working Groups that will focus on the practical implementation of our ESG strategy across different areas of the business.

These working groups will bring together colleagues from a range of disciplines including site operations, fleet management, supply chain, data analysis, facilities, and communications to collaborate on specific sustainability workstreams. Their role will be to translate strategic goals into actionable initiatives, share operational insight, and ensure that sustainability considerations are embedded into everyday decisions and processes.

Each working group will be aligned to a core theme within our sustainability strategy, such as:

- Carbon and energy
- Circular economy and waste reduction
- Social value and community engagement
- Sustainable travel
- Biodiversity and nature-based solutions
- Sustainable procurement and supply chain
- Sustainability data and reporting

The groups will be empowered to explore solutions, pilot new ideas, identify barriers, and report progress back to the Steering Groups for support and escalation where needed. This structure is designed to ensure that delivery is not top-down but collaborative, enabling those closest to the work to shape the how, while maintaining strategic alignment across the business.

By mobilising cross-functional teams around clear priorities, we aim to foster a culture of shared ownership, innovation, and continuous improvement, ensuring our sustainability strategy is not just a document, but a driver of real, measurable change.

Delivering Today,
Shaping Tomorrow.

Wilson James

For more information about our Carbon Reduction Plan, please contact us



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