



David Brown Santasalo

ENVIRONMENTAL  
SOCIAL  
GOVERNANCE

# ENVIRONMENTAL SOCIAL GOVERNANCE

ESG is recognised as an important requirement for investors, as companies that consider creating value for all their stakeholders – employees, customers, suppliers and wider society including the environment, are more likely to succeed and deliver strong returns. DBS already has in place many ESG related activities, policies and procedures and these have been collected together under the umbrella of an ESG framework.

Having a consistent approach across the group promotes our existing ongoing activities and drives improvement. Reporting to the Chief Executive Officer, the ESG committee comprises a Chair and section leads for Environment, Health and Safety, Human Resources, Data and Security, Legal and Compliance, Customer focus, and Divisional leads from our regions.



# THE FRAMEWORK ENVIRONMENTAL





## Policy Management & Compliance

DBS recognises the importance of the environment and that environmental stewardship is everyone's responsibility. Environmental issues have Board level representation in the form of the Group's Chief Organisation and Development Officer. There is also an EHS Manager for the UK and Group who co-ordinates DBS policies and procedures. DBS has a Global Environmental Policy in place across all its operations. In addition, Environmental Roles and Responsibilities are in place for all sites, setting out responsibilities for the Managing Director, Site Leadership teams and employees.

DBS has in place mandatory training and minimum standards in the following aspects:

- Environmental Management and Awareness Training – mandatory for all computer users via the Gear Academy; delivered via toolbox talks to the remainder
- Emergency Spill Procedure – mandatory training for all employees and placed on notice boards
- Waste Management Policy – mandatory training for all employees and placed on noticeboards
- Oil Storage Standard – mandatory implementation for all sites
- ISO 14001 - in place in seven of our sites, Australia, Chile, Finland, South Africa, Sweden, and UK. We aim to have all DBS locations acceded with 14001 by the end of 2028.

### Incidents Environment

All DBS sites have been provided with standards on environmental management, with training provided annually using our Gear Academy training platform. This training provides examples of good environmental management and standards for storage. Our future goals are to maintain the current standards set, along with annual self-audits in order to benchmark against performance.

### Hazard Reporting Programme

All DBS sites are targeted with undertaking monthly hazard observations, which is presented at the Senior Management Meeting on a monthly basis.

We have set a target of reporting 34 hazard reports per month across the group, dependent on headcount. Currently, we are trending at over 300% of this target! The average number of hazards being recorded is over 100 per month, demonstrating the business's commitment to good environmental management.

**Target for 2024: 374. Actual achieved: 1581**

**Achievement:** 38% increase on 2023 results of 1,145

### Training Courses

An environmental management module was created in 2021 and is updated on an ongoing basis. DBS employees can access this via our proprietary Gear Academy training platform.

Rigid annual self audits must also be completed by all sites, ensuring the DBS ethos is adopted into everything we do. We also ask that all self audits are measured for accuracy, any defects are reported and actions closed down.

Environmental awareness and management training module: **148 employees assigned training**  
Module completion rate: **100%**



## Resource Efficiency and Protection

### Energy

Carbon Accounting has been implemented across the DBS group. We have also employed an Energy Manager and we have Scope 1 and 2 emissions accounting in place for all DBS locations. To assist the Energy Manager, we have also appointed Energy Champions for all departments conducting routine audits. The Energy Champions have autonomy for managing the Scope 1 and 2 emissions in their respective areas.

Our future goals are to reduce energy consumption by utilising best practice improvement standards. In line with our commitment to the SBTi, we aim for a reduction of 53.9% in Scope 1 and 2 emissions by the end of 2032 (this equates to 4.9% per annum). Furthermore, in 2024 alone, the business achieved a reduction of Scope 1 and 2 emissions of 23.7% vs a target of 14.7%!

### Waste

We have implemented waste management procedures across all sites to ensure safe and compliant waste handling, in addition, waste quantities are recorded at every location. DBS also carry out waste audits to determine waste reduction and recycling opportunities. Following each audit, reduction targets are set.

### Chemical safety and materials handling

DBS adhere to the oil storage global standards and have COSHH or equivalent compliance in place across all sites. We have issued oil storage standards to all sites across the group and this includes rigid annual self audits, which must be completed by all sites ensuring adherence of the targets set. Any defects are measured and reported, with completion of actions demonstrated.



## Climate Change

DBS is acutely aware of the need to fast track change due to the climate emergency. We have been gathering data on carbon emissions since embarking on the Future Ready programme in 2019, which was our call to action for change. Since that time, we have full carbon accounting in place. Our targets were validated by the SBTi through our near term reduction plans, making us the first business of our kind to achieve validation of our targets.

We will continue to manage our SBTi targets by using mid to long term strategy and plans to achieve challenging objectives. We have made significant progress on the reduction of our Scope 1 and 2 emissions which have reduced by 23.7% vs our target of 14.7%. Our overall aim is to reduce Scope 1 & 2 emissions by 53.9% by 2032, so the business is on track to achieve this. Scope 3 emissions will be driven by supply chain engagement and we will continue to report on these achievements in the coming years.

# THE FRAMEWORK

## SOCIAL







## Health & Safety

DBS have in place a Group Health and Safety management policy in order to ensure, as far as reasonably practical, the health, safety and welfare of all employees and other persons who may be affected by our activities. The primary aim is to ensure compliance with all relevant legal requirements, and to ensure a safe place of work for our employees and visitors. We monitor and manage our activities in order to do this and aim to reduce workplace hazards wherever possible. DBS provide all employees with relevant training, materials, PPE and safe-guarding equipment, in addition skills matrices are kept.

Sites undertake annual self-audits. All H&S data, such as safety observations and Lost Time Incidents (LTIs) are recorded and monitored on site. LTIs and LTI rates across the Group are also monitored centrally and this data is reviewed by the Board on a monthly basis for all sites. This ensures worldwide safety alerts are issued and enables us to identify any trends in the types of incidents occurring. The goal is to reduce LTIs across the Group and for zero fatalities.

### Safety Observations

A preventative safety programme has been introduced for all sites, which includes monthly targets tailored to headcount. This is recorded and reported at the monthly Senior Management Meeting. We will continue to track this worldwide, ensuring any trends are mapped and safety alerts are issued accordingly.

In 2024, we set a global target of 6,000 observations. The DBS group excelled beyond this target, achieving 7,037 safety observations, this compared to 5,664 in 2023, which was a 21% increase.



## Mental Health

DBS have a Group wide initiative to promote positive mental health, called **Mental Health at Work**. DBS has a dedicated intranet section for this initiative, containing relevant resources. A poster campaign highlighting DBS Core Values is publicised at various locations at all sites. The programme provides training and support materials and dedicated Mental Health First Aiders are available within each division. DBS also provides online signposting to organisations who are able to provide support and regularly communicates Mental Health Awareness messages. Additional, dedicated support is provided by an External Mental Health Support company, Care First.

We have intranet resources for all the above resources, along with information on our annual mental health employee challenges. The challenges vary in theme but always encourage participants to have the opportunity to get into nature or the outdoors, and work with their colleagues across the global business.



## Whistle Blowing

The DBS whistle blowing policy is in place to ensure we conduct our business with honesty and integrity. A culture of openness and accountability is essential in order to prevent situations which could lead to misconduct occurring and to address them should they occur. DBS encourage staff to report suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality

will be respected. DBS provide staff with guidance as to how to raise those concerns. We reassure staff that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

DBS provide a dedicated Compliance Helpline which is independent and outsourced to third-party whistleblowing service, Safecall. This facilitates anonymous reporting and is accessible by all employees. Posters are displayed throughout all DBS sites to ensure visibility and knowledge of the service. The whistleblowing service is detailed within the recent iteration of the Global Anti-Corruption training material, which is delivered via the DBS Gear Academy.



## Diversity & Inclusion

Gender diversity throughout DBS will be measured via the percentage of males employed versus the percentage of females employed. Our aim is to increase the number of females employed at DBS across all levels of the business.

### Gender Pay Gap

DBS are establishing new ways of thinking to find solutions and to improve diversity across the Group. We will achieve our commitment to the elimination of bias in the workplace by discussing our gender pay gap openly, transparently and continuously as part of our Executive & Leadership team agendas. We will actively promote our Whistleblowing Policy and ask all our people to let us know when they see any actions which don't meet our high standards of behaviour. We embed good practice into all our performance management, pay & reward and resourcing processes.

The gender pay gap measures the difference between male and female average earnings regardless of the nature of their work. The Mean calculation will be used to measure the average pay or bonus for a male against that of a female.

Our goal is to reduce the Gender Pay Gap with year on year improvements.

### Employee Satisfaction

Surveys are conducted to establish how satisfied DBS employees are, this assists us in anticipating potential future issues. DBS regularly evaluate feedback on Management and teamwork related issues. We will measure the effects of any organisation change either at the local level or at a group wide level.

In 2023, we had clarified some confusing questions and added the NPS score questions, albeit for online responders only. By 2024 we had refined the survey further, increasing to 42 questions. In addition, we introduced a QR code, meaning all responders could access the survey regardless of access to a work email address. This resulted in an NPS score of -2.11 in 2024.

We aim to increase the response rate, and employee satisfaction, year on year.

# THE FRAMEWORK GOVERNANCE







## Corporate Governance & Compliance

Good governance is at the heart of DBS strategy and organisation. Headed by the DBS Group Board and managed by the managed by site leadership teams in conjunction with the Group Finance team, monthly Board meetings are held for each region in addition to the monthly Group-wide Senior Management Meeting. Relevant governance support is provided by external legal and company secretarial advisors where required. A dedicated Regulatory Compliance team monitors and supports regulatory compliance across all key areas, as outlined below. The Group compliance function reports to the CFO fortnightly and to the Group Board on a quarterly basis.

Our approach is risk based and we carry out formal compliance risk assessments annually, formulating and amending Group policies and procedures to manage identified risks. The Gear Academy training programme is a core tool for ensuring understanding of and engagement with Group policy and regulatory requirements. This on-line training programme is available 24/7 in 6 core languages and we monitor engagement via integrated data management tools. The DBS Governance Framework training course was issued via the Gear Academy. The module material was kept under review and reassigned where appropriate.

On-going training and awareness is communicated via the Compliance Liaison Officer (CLO) calls.

### Delegations of Authority

We work with the DBS internal audit function to monitor compliance and we manage and maintain records of reported incidents. In order to engage all levels of the business in pro-active compliance activity, a network of CLOs operates to form a bridge between the sites and the head office function and aid consistent and continuous improvement. A key tool for managing compliance risk is our system of internal financial controls, including specified delegations of authority, which are designed and led by the Group finance function, and operated both at head office and at site level. A key focus for the Group finance and compliance teams has been, and continues to be improvement in the quality, accuracy and relevance of reporting on governance issues.

Our goal is to ensure proper understanding and positive engagement at all levels and across all jurisdictions, with zero breach incidents. To achieve this we have local and group delegation of authority matrices, which are available via the finance and compliance intranet hubs. In addition, training is issued via the DBS Gear Academy.

### Declarations of Interest

Declarations of Interest forms are issued globally to all new employees. We issue training to Managers in relation to how to manage declarations from direct reports. Training is also delivered to employees in relation to when and how to complete the Declaration of Interest form.

## Sanction Compliance Programme

DBS implements a robust sanctions compliance programme to protect the business against the risk of a global sanctions regime breach. Utilising resources available via a software-based Risk and Compliance database, the Group compliance function manages the programme and reports directly to the Board on such matters. Customers, suppliers, intermediaries, counter parties, and business owners are routinely screened against global sanction lists, results analysed, and appropriate risk mitigation measures taken. Periodic screening, the interval of which is based upon a risk review of the entity or individual in question, is carried out thereafter as part of an on-going mandatory risk review process.

## Data Protection

A Statutory Company policy is in place and the Group Compliance function reports to the Board on these issues. Quarterly data security committee meetings take place. DBS conduct regular data mapping exercises and review data processor agreements. Annual risk assessments are undertaken and approved by the Board alongside an annual compliance plan.

Data Protection policies and privacy notices are available for multiple DBS offerings. Updated training material has been issued to all new employees. In addition, we currently have a data mapping exercise on-going for all sites. In 2024, we also designed and rolled out a new audit process.

## Human Rights

DBS make it clear via our third party code of conduct that we do not tolerate modern slavery in our supply chain. As part of our ongoing commitment we will assess how well understood the legal and compliance process requirements are within DBS and measure engagement. This will enable us to address any gaps with training and offer support to better understand the risks in the context of the DBS Group. Particular focus will be on supply chain and ensuring the suitability of policies and processes. Our goal is to prevent breaches and to finesse our breach response process.

## Anti-Bribery and Corruption (ABC)

A Statutory ABC policy is in place. The Group compliance function reports to the Board on these matters. The regular training delivered to employees and third party business partners was updated and issued via the DBS Gear Academy, in addition we also released a Compliance podcast to aid learning.

The ABC policy is supported by due diligence on third party business partners, a third party code of conduct and annual risk assessments. Our reviews enable us to address any gaps with training and support, and prevent breaches. We co-ordinated assurance between the Group wide Commission Payment Approval process and internal audits.



## Cyber Security

DBS recognises the importance of the cyber security in protecting all categories of data from theft and damage, this includes all aspects of personal information, intellectual property, data, and information systems. In 2021, a dedicated security team was introduced to manage these activities. DBS continues to increase funding annually in the area of cyber security by investing in preventative, detective and restorative technologies and ICT staff training.

To ensure alignment with NIS2, we are working towards achieving the ISO 27001 certification which provides a framework for organisations to manage their information security and protect their data. Achieving the ISO 27001 certification will demonstrate our commitment to securing confidential information and building trust with our customers and stakeholders.

### Anti-phishing Training

Cyber threats can come from any level within the organisation and it is important to educate staff about simple social engineering scams like phishing and more sophisticated cybersecurity attacks like ransomware or other malware designed to steal intellectual property and personal data.

Cyber security awareness – this is mandatory for all computer users via the uSecure tool. We now release training on a monthly basis to ensure all employees continually improve their levels of comprehension. In 2025, 90% of all computer users completed the training.

### Investment in Technology (Risk Register)

As part of DBS's ongoing commitment to cyber security, ICT Staff have undertaken certifications through ISACA in CISM, CRISK & CGEIT. DBS maintains a risk register in alignment with the NIS2 framework and we are pleased to report that 100% of identified risks have been mitigated and are within our appetite tolerance.

Our aim is to build on this annual process and expand the following;

- **Compatibility with the NIS2 framework** – European Union regulation aimed at enhancing cybersecurity across critical sectors by establishing mandatory security measures and incident reporting requirements for organisations
- **Reportable incidents** – Policies & procedures in place to report significant incidents in accordance with NIS2. DBS works along side our partners to ensure seamless integration of our reporting needs. SOPHOS – (MDR) Managed Detection & Response – Managed SD-WAN service & Back-up as a Service (BaaS) and Disaster Recovery as a Service (DRaaS). We are pleased to report that to date, we have had zero reportable incidents.

### Business Continuity Planning (BCP)

DBS have a contract with INONI, who provide software and services for business continuity, resilience and risk management which helped us create BCP plans for our manufacturing locations. Plans are in place for our manufacturing locations in Finland and South Africa, with a view to roll out to the remaining manufacturing locations. All plans will be updated annually, along with DR scenario testing.

### Disaster Recovery Plan

DBS have a fully managed contract with Synapse to create a robust disaster recovery environment. All sites are backed up centrally into immutable storage, with back-up service adherence at 99.9%. We also achieved a disaster recovery test of one critical system.



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