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Sustainability Disclosure Requirements and Investment Labels

The UK’s take

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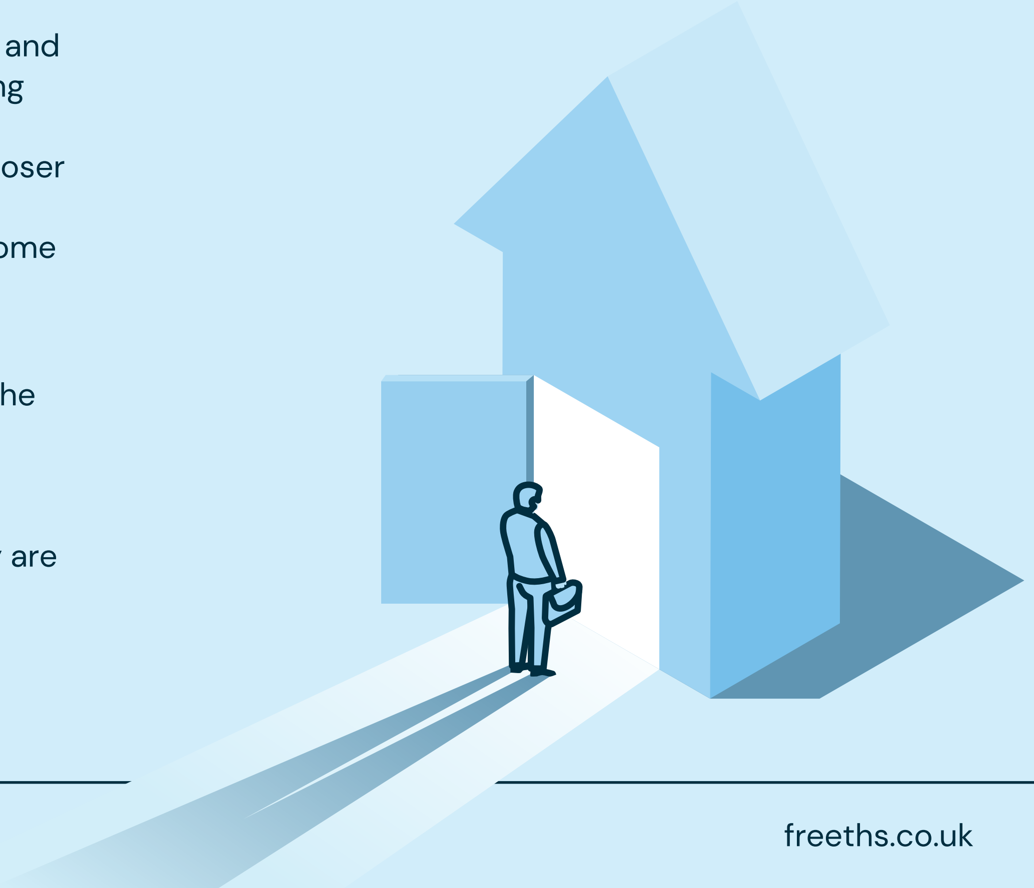
On 25 October 2022 the FCA published its consultation (CP22/20; the **CP**) on the Sustainability Disclosure Requirements ("**SDR**") and investment labels for the UK market in what is becoming an increasingly complex field to navigate. The CP builds on the FCA's Discussion Paper (DP21/4; the **DP**). The proposed regime would require UK asset managers making sustainability-related claims about their products to substantiate those claims in a way that is comparable between products and is accessible to clients and consumers.

Background

The market for sustainable investment products – in the UK and worldwide – has grown rapidly and consumers can access an increasingly wide variety of product types. However, there are growing concerns that firms may be making exaggerated, misleading or unsubstantiated sustainability-related claims about their investment products; claims that do not stand up to closer scrutiny (also known as 'greenwashing'). The FCA is concerned that greenwashing has already eroded trust in sustainable investment products, which, if not addressed properly, may deter some consumers from investing in this market which could ultimately curtail the supply of capital for investments that can drive change.

The proposals are intended to be the main tool for the FCA to force managers to substantiate the sustainability claims they make. The FCA acknowledges that the current market for sustainable investments is difficult for consumers to navigate. For example, there is a lack of standardised disclosure and reporting for products with sustainable investment objectives which makes it difficult for consumers to determine what each product is seeking to achieve and whether they are achieving those objectives.



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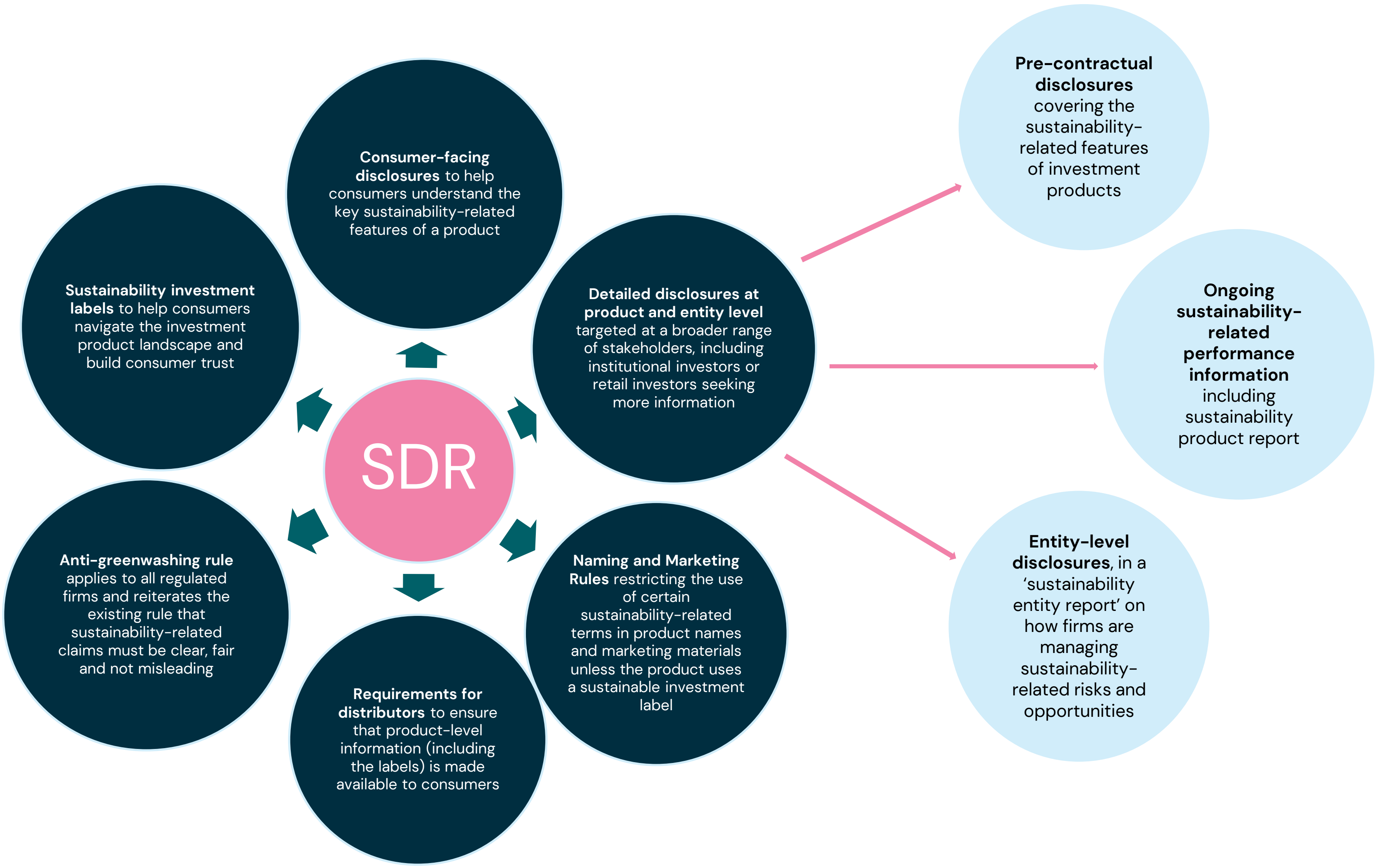
"As the market for sustainable investing has grown rapidly, we believe such an integrated and holistic framework will help consumers navigate an increasingly complex investment product landscape, protect them from greenwashing, and should, ultimately, go some considerable way towards rebuilding trust in the sector's sustainability claims and green credentials."

Adam Edwards, Head of Financial Services Regulation

The FCA's proposals in a nutshell



Broadly speaking, the new regime introduces three investment labels for products with a sustainable strategy: ‘sustainable focus’, ‘sustainable improver’ and ‘sustainable impact’.

This labelling regime, which is an ‘opt-in’ regime, would have several layers of disclosures – starting with consumer-facing disclosures, through to more detailed entity and product-level disclosures. In addition to this, a general ‘anti-greenwashing’ rule would apply to authorised firms, requiring them to ensure their sustainability claims are also fair, clear and not misleading.

Importantly, firms offering ‘in-scope’ investment products will have the opportunity to use one of the sustainable investment labels if they choose to and if they meet the FCA’s proposed qualifying criteria. However, where sustainability-related features are integral to an investment policy and strategy but the firm chooses not to use a label, or does not qualify to do so, they will need to ensure those features are communicated in a proportionate way to the sustainability profile of the product, in line with the naming and marketing rules (set out in more detail below).

Each of these requirements is examined in more detail below. As part of this, we have also included what the requirements mean in practice.

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Scope of the SDR and labelling regime

In scope firms

The new rules apply to firms conducting “sustainability in-scope business” in the UK in respect of “sustainability products”:

The following types of firms are **in scope**:

- Firms carrying out portfolio management
- UK UCITS management companies
- ICVCs that are UCITS without a separate management company
- Full-scope UK AIFMs
- Small-authorised UK AIFMs

In scope Products

In scope firms will need to apply the new rules when conducting activities in relation to “sustainability products”. These are:

- Authorised funds (excluding feeder funds and funds in the process of winding up or termination)
- Unauthorised AIFs, including investment trusts
- Portfolio management services, including discretionary portfolios.

It is significant that the current proposals are not intended to apply to non-UK firms marketing overseas products to investors under the UK Alternative Investment Fund Managers Directive (**AIFMD**) or the national private placement regime (UK **NPPR**). However, the FCA does make clear that it intends to build on these proposals and follow up with further consultations concerning overseas funds in due course.

Classification criteria

The FCA has determined that for a product to qualify under one of the three sustainable investment labels it must meet each of the following criteria:

1. five overarching principles covering:

i. Sustainability Objective

A product must have an explicit environmental and/or social sustainability objective as part of its investment objectives.

ii. Investment Policy and Strategy

A firm's investment policy and strategy for the product must be aligned with the product's sustainability objective.

iii. Key Performance Indicators (KPIs)

A firm must specify credible, rigorous and evidence-based KPIs that measure the product's ongoing performance towards achieving its sustainability objective.

iv. Resource and Governance

A firm must apply and maintain appropriate resources, governance and organisational arrangements commensurate with the delivery of the product's sustainability objective

v. Stewardship

A firm must maintain its active investor stewardship strategy and resources (at firm-level or product-level) in a manner consistent with the product's sustainability objective.

2. a number of key cross cutting considerations (including what firms must do and what firms must disclose);
3. certain category specific key considerations relevant to a particular label.

For further information on the classification criteria, please do not hesitate to contact our team for a confidential, no-obligation discussion to review what support we can give you.

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The three labels

Classification and labelling are the most fundamental components of the regime. The labels are intended to prevent greenwashing and allow consumers to navigate the market more easily and accurately.

The regime introduces three labels for sustainable products: ‘sustainable focus’, ‘sustainable improvers’ and ‘sustainable impact’. We have expanded on what these labels mean below.

Sustainable focus

Description

These are products with an objective to maintain a high standard of sustainability in the profile of assets held by investing to (i) meet a credible standard of environmental and/or social sustainability; or (ii) align with a specified environmental and/or social sustainability theme.

Consumer facing description

Invests mainly in assets that are sustainable for people and/or planet.

Key features

- **Sustainability objective**: alongside its financial risk/return objective, the product will have an objective to invest in assets that meet a credible standard of environmental and/or social sustainability, or that align with a specified environmental and/or social sustainability theme.
- **Primary channel or sustainability outcomes**: the product would pursue its sustainability goals primarily via the market-led channel of influencing asset prices, and thereby reducing the relative cost of capital of sustainable economic activities/projects.
- **Secondary channel for sustainability outcomes**: the product will also typically pursue continuous improvements in the sustainability performance of assets through investor stewardship activities.

To meet consumers’ expectations, the criteria for this category include that **at least 70%** of a ‘sustainable focus’ product’s assets meet a credible standard of environmental and/or social sustainability, or align with a specified environmental and/or social sustainability theme. Designating a product as ‘Sustainable Focus’ therefore means that these products must be robust, evidence-based and transparent

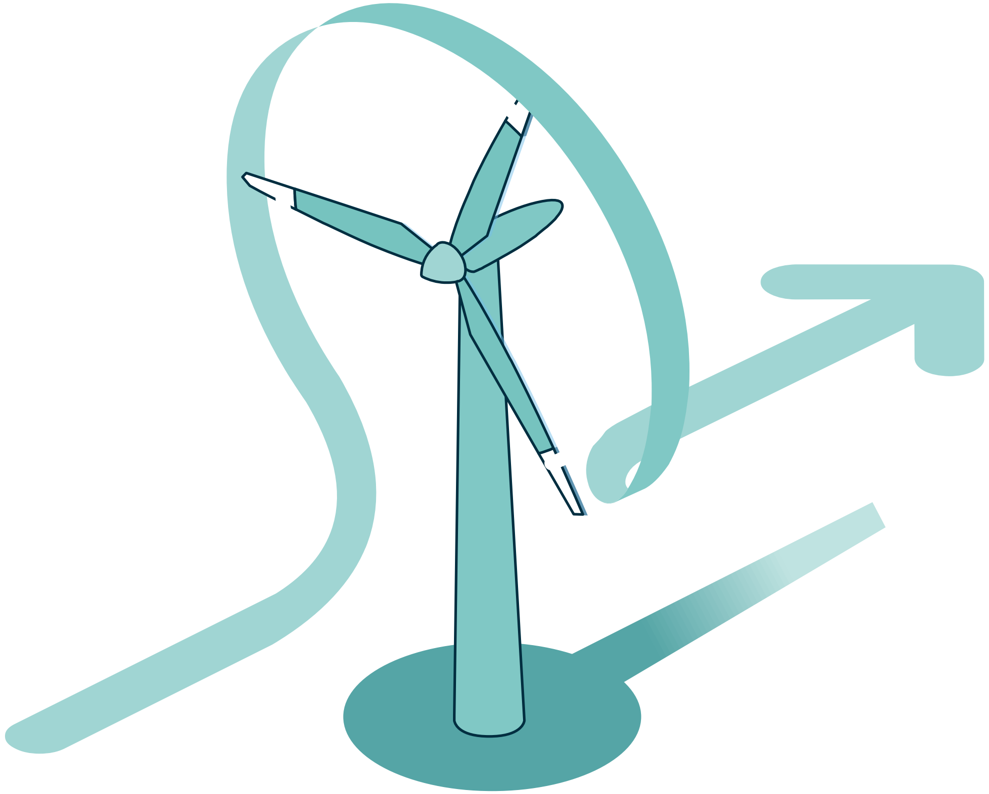
Sustainable focus

What does this mean in practice?

The FCA expects these products to be active and highly selective in their underlying investment selection and management, applying extensive screening to allocate assets predominantly to investments that would reasonably be regarded as being environmentally or socially sustainable (or both), or supporting environmental or social sustainability (e.g., by delivering sustainable solutions).

For example: a sustainable water and waste fund which aims to achieve long-term capital growth from a portfolio primarily made up of equity securities by companies involved in the manufacture and sale of products and services used in the water and waste management sectors. At least 70% of the fund's assets will be invested in activities which support the achievement of Goals 6 (Ensure access to water and sanitation for all) and 14 (Conserve and sustainably use the oceans, seas and marine resources) of the UN Sustainable Development Goals.

The fund will consider a wide range of environmental characteristics, which include but are not limited to, water and waste management. The fund is actively managed, and seeks to promote these characteristics by adhering to the institution-wide sustainability framework, including frequent and targeted interaction with investee companies' boards and management teams.



Sustainable improvers

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Description

These are products with an objective to deliver measurable improvements in the sustainability profile of assets over time. These products are invested in assets that, while not currently environmentally or socially sustainable, are selected for their potential to become more environmentally and/or socially sustainable over time, including in response to the stewardship influence of the firm.

Consumer facing description

Invests in assets that may not be sustainable now, with an aim to improve their sustainability for people and/or planet over time.

Key features

Given the broad scope of assets in which products in this category are likely to be invested, and the transitioning nature of their sustainability profiles, the proposed criteria for this category emphasise that the firm must disclose clearly where the product will and will not invest, and describe its asset selection and stewardship activities, including escalation triggers – and potential divestment – if its stewardship is not achieving the intended improvements.

The proposed criteria for this category also emphasises that a firm seeking to apply a 'sustainable improvers' label to its product should also describe how it assesses the potential for the sustainability profile of assets to improve over time. A clear and measurable target for improvements in the sustainability profile of assets must also be reflected in KPIs enabling a firm providing a 'sustainable improvers' product to be held to account for performance over time. The key features of this category of product are:

- **Sustainability objective:** alongside its financial risk/return objective, a 'sustainable improvers' product will have an objective to deliver measurable improvements in the sustainability profile of its assets over time, including through investor stewardship.

- **Primary channel for sustainability outcomes:** this product would pursue its sustainability goals primarily via the channel of investor stewardship. The product's stewardship approach would be directed towards encouraging and accelerating improvements in the environmental or social sustainability profile of its assets, including through participation in system-wide initiatives, with flow-on positive implications for environmental and/or social sustainability.

- **Secondary channel for sustainability outcomes**: portfolio construction and asset selection in 'sustainable improvers' products would be geared towards identifying those assets that are best-placed to improve their sustainability profile over time. So, a secondary channel would be the market-led channel of influencing asset prices and the relative cost of capital of more sustainable economic activities/ projects.

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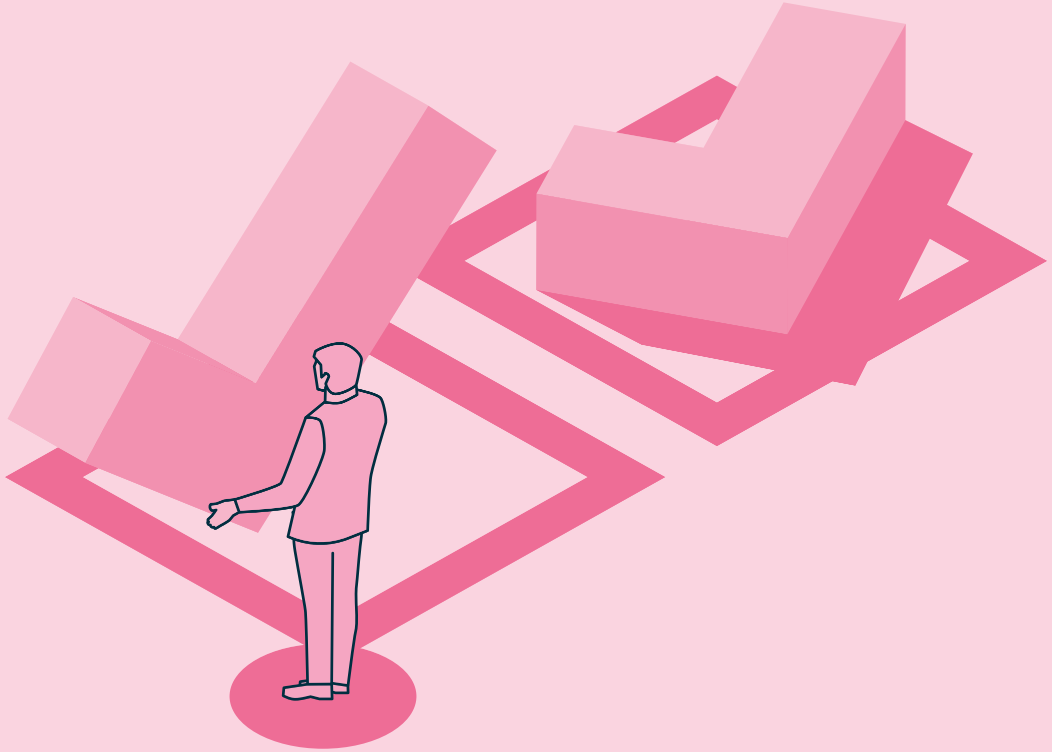
Sustainable improvers

What does this mean in practice?

The FCA expects these products to be invested across a broad range of sectors, with assets allocated according to objective criteria that emphasise their potential to become more environmentally or socially sustainable over time – including in response to active investor stewardship.

For example: this category of product could include a fund which aims to provide exposure to developed and emerging equity markets with a view to significantly overweigh shares of companies that have clear decarbonisation plans and a track-record of honouring their climate pledges. The investment process of such a fund would probably include strong engagement and stewardship focus and the team running the fund could engage with investee companies to encourage them to adapt their business models to meet global climate change goals and to divest from companies that fail to meet minimum standards.



Sustainable impact

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Description

These are products with an explicit objective to achieve a positive, measurable contribution to sustainable outcomes. These are invested in assets that provide solutions to environmental or social problems, often in undervalued markets or to address observed market failures.

To evidence environmental or social outcomes in line with the product's stated objective, the manager would be expected to apply industry standard approaches to performance measurement, reporting against rigorous, evidence-based KPIs that capture the investor contribution to positive sustainability outcomes.

Consumer facing description

Invests in solutions to problems affecting people or the planet to achieve real world impact.

Key features

The key features of this category of product are:

- **Sustainability objective:** alongside its financial risk/return objective, the product will have an objective to achieve a pre-defined, positive and measurable environmental and/or social impact.

- **Primary channel for sustainability outcomes:** the product would pursue its sustainability goals by directing typically new capital to projects and activities that offer solutions to environmental or social problems, often in underserved markets or to address observed market failures. The product would be expected to have a stated theory of change, and to pursue a highly selective asset selection strategy aligned with that theory of change.

- **Secondary channel for sustainability outcomes**: driving continuous improvements in the sustainability performance of assets through investor stewardship activities would be a secondary channel.

The criteria for this category include that the sustainability objective must be to achieve a predefined, positive, measurable real-world environmental and/or social outcome.

What does this mean in practice?

The FCA expects these products to typically be highly selective, emphasising investment in assets that offer solutions to environmental or social problems and that align with a clearly specified theory of change.

For example: an investment trust which aims to have a positive environmental impact by investing in assets that support the transition to a low carbon, more efficient energy system and help the UK achieve Net Zero. The company invests across three thematic areas predominantly in the UK: energy storage and distribution, promoting efficient consumption and onsite generation, and distributed renewable energy generation. While a considerable amount of additional capital has been observed entering the sector, the company considers that there remains a funding gap for new generation that needs to be closed if decarbonisation targets are to be achieved. As a consequence, the trust has modified its investment policy to allow for investments into developers and development stage assets to ensure that an investment in the trust can provide higher levels of additionality.

EU SFDR and UK SDR

The FCA recognises that a lot of asset managers operate internationally. To this extent, the FCA has sought, as far as possible, to achieve international coherence with other regimes – notably the Sustainable Finance Disclosure Regulation (**SFDR**) in the European Union (**EU**). However, the FCA does accept that the starting point of its proposed labelling regime is materially different to the EU SFDR.

While the SFDR's stated intention was that of an enhanced disclosure regime only, the UK framework is designed from the outset as a labelling regime, with detailed criteria to determine whether a given product is eligible for the relevant label.

As a high-level overview, the SFDR introduced the following three categories of disclosure requirements:

Article 6

Funds that do not fully integrate sustainability into the investment process

Article 8

funds that promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices

Article 9

Funds that have sustainable investment as their objective

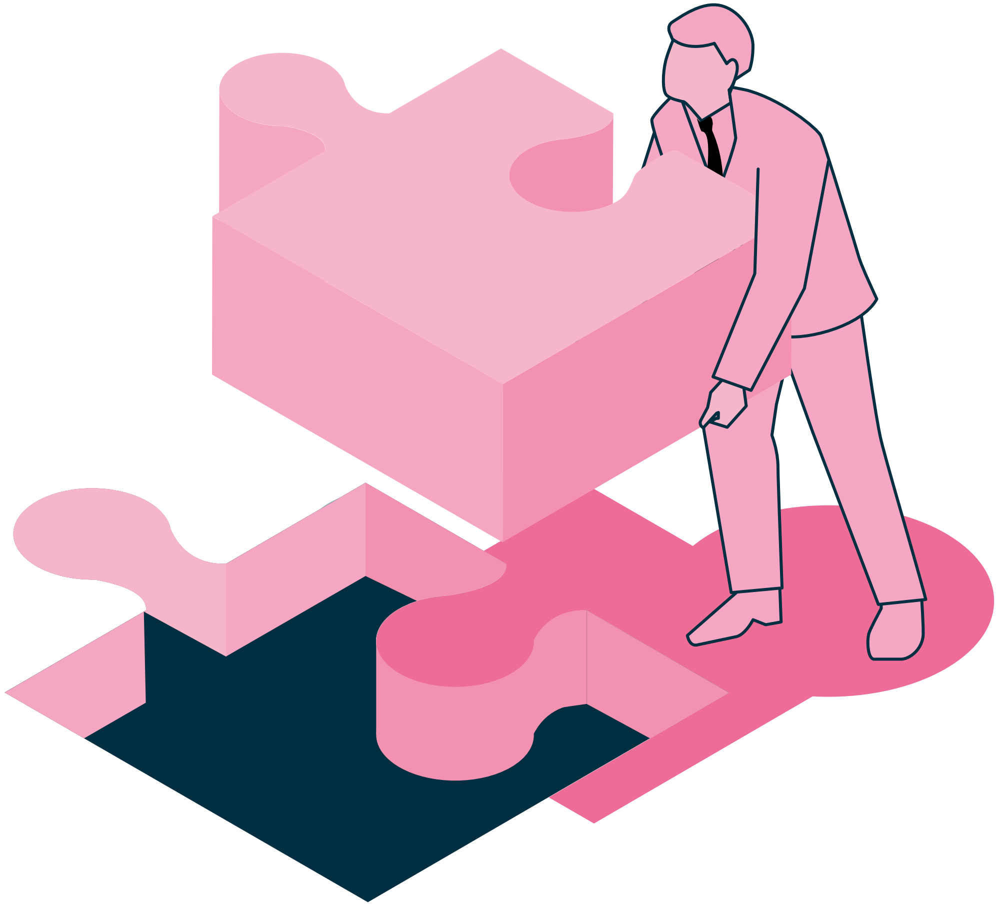
However, over time these three categories have become a de facto classification and labelling system.

Importantly, unlike the SDR, the SFDR does not work on an opt-in basis for firms wishing to promote 'sustainable' products. Instead, all relevant financial market participants (including fund managers, portfolio managers and investment advisers) engaged in or marketing into the EU must comply with the regime whether their product or service has a sustainable initiative or not.

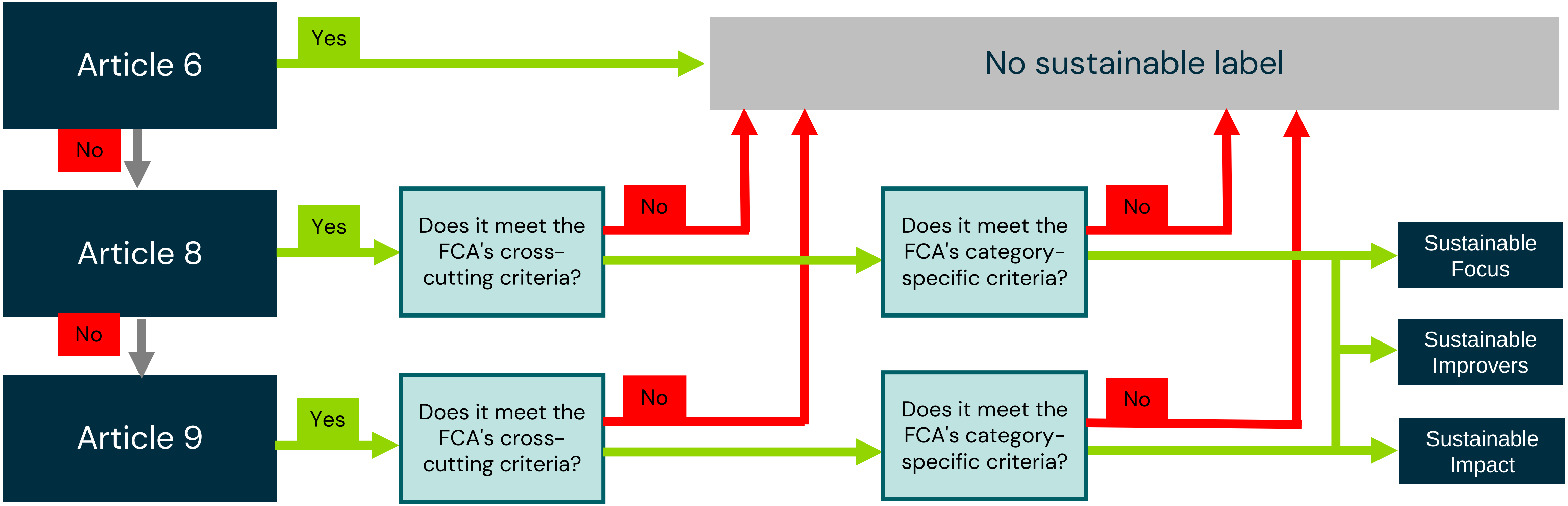
In practical terms, the 'focus', 'improver' and 'impact' labels do not correlate directly with Articles 6, 8 or 9 of the SFDR. There is no guarantee one will satisfy another. Each product must be classified under the SFDR and SDR on its own merits. For example, a firm could manage a product they intend to categorise as Article 8 or Article 9 under the SFDR but which does not meet the criteria for the investment labels within the SDR (and as a result, the SDR is being seen by many as a higher bar to meet with respect to sustainability than the SFDR).

In addition, the SFDR Article 6, 8 and 9 distinction spawned a market perception of a spectrum – or sliding scale – of 'greenness'. Article 8 funds have commonly been referred to as 'light green', Article 9 funds as 'dark green' and Article 6 funds as 'grey' funds (and shades within each). Furthermore, over time, as more guidance has been issued by European regulatory bodies on how SFDR and its related technical rules apply, the criteria for achieving Article 8 (and in particular Article 9) status has become more difficult for managers to achieve.

The FCA's proposed regime does not set out to create a similar spectrum. Instead, the rules focus more on what the products actually do, how they invest, and how they achieve their stated sustainable goals. The aim of this is to increase transparency and clarity on what consumers can expect –assisting them to navigate what has become a highly nuanced area – and helping them achieve their own investment goals through better informed product selection.



The FCA makes it clear that, in considering how to treat a product categorised under EU SFDR which also falls within the UK's proposed regime, firms should follow the steps below:



In particular, firms should be aware that Article 8 funds will need to 'level up' to meet the FCA's criteria by specifying a sustainability objective. The SFDR does not currently impose any minimum sustainability standards on Article 8 funds (other than the requirement for all investee companies to exhibit good governance) whilst, in contrast, the FCA focuses on 'intentionality', especially in relation to investor contribution to positive outcomes for the environment and/or society in relation to products having a sustainability label. Products otherwise falling within Article 8 of the SFDR that do not demonstrate sufficient 'intentionality' (or that do not meet the principles or the classification criteria under the FCA's SDR (as detailed above)) will not qualify for a UK sustainability label.

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“The FCA’s proposed regime does not set out to create a spectrum of “greenness" or "goodness" across all products. Instead, the rules focus more on what the products actually do, how investment decisions are made, and how that achieves their sustainable goals. The aim of this is to increase transparency and clarity on what investors can expect – assisting them navigate what has become a highly nuanced area – and helping them achieve their own investment goals through better informed product selection.”

George Metcalfe, Partner, Private Funds

Disclosures

The FCA is proposing to compliment the labels with additional disclosures to help improve consumer understanding of the sustainability elements of these products.

The new rules will require both high-level disclosures, designed to increase consumer understanding, and more granular disclosures which are aimed at broader range of stakeholders who want more information about products and firms.

Consumer-facing disclosures - high level disclosures

The consumer-facing disclosures will be limited to two sides of A4 when printed (although they must be accessible in digital format) to cover information under the following headings:

- Basic information
- Product label
- Sustainability goal
- Sustainability approach
- Unexpected investments
- Sustainability metrics
- Signposting to other disclosures

This is a standalone disclosure requirement, which aims to help consumers understand the key sustainability-related features of a product by requiring firms to provide easily accessible product- level information.

It includes information like the product’s sustainability objective, investment approach and performance against the objective. This disclosure is to be published alongside the KID (where relevant) and needs to be made available in a prominent place on the relevant digital medium for the firm (e.g. website or app) and it should be no more than 'one mouse click away' from where the label is presented.

Who does this apply to?

All in-scope firms marketing in-scope products to retail investors, irrespective of whether the product makes use of a label, but excluding firms providing portfolio management services. For products that are not engaged in any sustainability-related strategies, the disclosure will be inherently more limited.

Detailed product-level disclosures – more granular disclosures

In addition to disclosures directed towards retail investors, more detailed disclosures are available for institutional investors and other stakeholders – or retail investors that may be interested in receiving more information.

These disclosures contain additional information in relation to the product. These disclosures will provide greater transparency on the product's sustainability objective, strategy, and progress towards meeting the objective, as well as ongoing performance metrics and contextual information. Such disclosures should be made in pre-contractual disclosures (for example in the prospectus) and in the sustainability product report.

I. Pre-contractual disclosures

These disclosures cover the sustainability-related features of an investment product e.g. its sustainability objective and investment policy and strategy. Such disclosures could be set out in the fund prospectus and the information must be disclosed both for products which use a label and for products that do not use a label but which have sustainability-related features that are integral to their investment strategy.

Who does this apply to?

The pre-contractual disclosures are applicable to: (i) all in-scope firms using a sustainable investment label, excluding firms providing portfolio management services; and (ii) firms not using a label but where sustainability-related features are integral to the investment policy and strategy (excluding firms providing portfolio management services). Where a product does not use a sustainable investment label, nor has sustainability related features, no pre-contractual disclosures are required.

Detailed product-level disclosures – more granular disclosures

II. Sustainability product report

In respect of products that use a label, a sustainability product-level report sets out ongoing sustainability-related performance information, including key sustainability-related performance indicators and metrics. The sustainability product report must include information relating to:

- The product's investment policy and strategy
- The product's performance against its sustainability KPIs
- Where stewardship plays an important role in the product's investment policy and strategy, the performance of the product's stewardship KPIs and the outcomes of the product's stewardship activities

It is proposed that the sustainability product report is published in a prominent place on the main website of the firm (e.g. with a link from the homepage).

Who does this apply to?

The sustainability product report is applicable to all in-scope firms using a sustainable investment label, except firms providing portfolio management services and UK AIFMs managing unauthorised AIFs not listed on a recognised exchange.

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Detailed entity-level disclosures

In addition to information on the sustainability-related features of investment products, clients and consumers are increasingly interested in how firms offering these products are managing sustainability risks and opportunities.

The FCA is planning to introduce core entity-level disclosure requirements based on the four recommendations of the Task Force on Climate-Related Financial Disclosures ("**TCFD**"):

- the governance around sustainability related risks and opportunities;
- the impacts of sustainability-related risks and opportunities on their business, strategy, and financial planning, where such information is material;
- how the firm identifies, assesses, and manages sustainability-related risks; and
- the metrics and targets used to assess and manage relevant sustainability-related risks, where such information is material.

Who does this apply to?

All in-scope asset managers with AUM of £5 billion or more (on a 3-year rolling basis) even if sustainable labels are not used.

Initial disclosures from largest in-scope firms (those with AUM in excess of £50 billon AUM) will be due provisionally by 30 June 2025, smaller in-scope firms will be due to publish their initial report by 30 June 2026. Please note that this timeline could change in light of the FCA's latest update (which is detailed below in the section on 'Timing').

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Naming and Marketing Rules

If a product does not make use of one of the three new sustainable labels, it will still need to meet certain naming and marketing requirements.

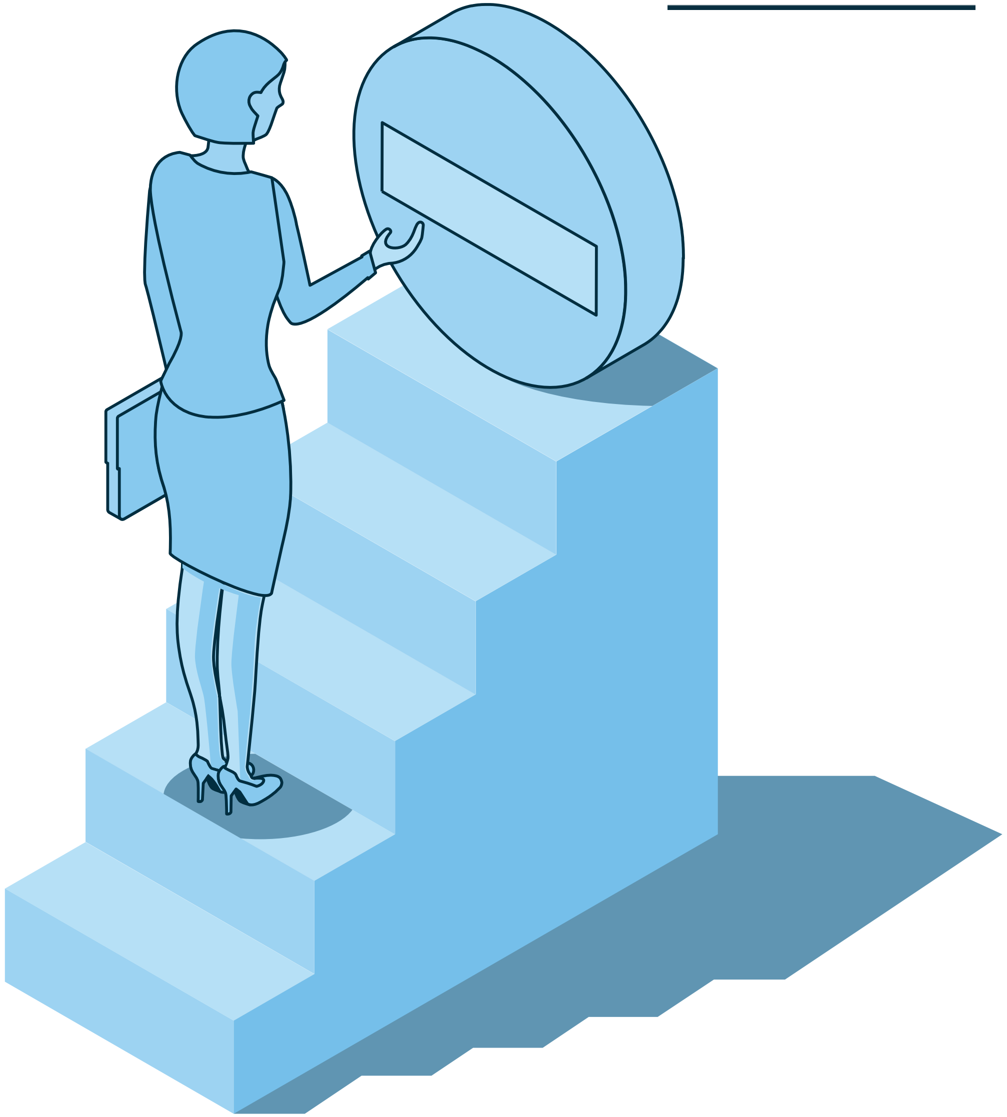
In summary, asset managers providing in-scope products to retail investors that do not qualify for or use one of the sustainable labels are prohibited from using sustainability-related terms including (but not limited to) 'ESG' (or 'environmental', 'social' or 'governance'), 'climate', 'impact', 'sustainable' or 'sustainability', 'responsible', 'green', 'SDG' (sustainable development goals), 'Paris-aligned' or 'net zero' in their product names and marketing.

Who does this apply to?

All in-scope firms marketing in-scope products to retail investors, that do not use one of the new sustainable labels.

Anti-Greenwashing Rule

A key element of the FCA's objective for the SDR and labelling regime is to reduce greenwashing. Therefore, the FCA is proposing a general anti-greenwashing rule which would require **all regulated firms** to ensure the naming and marketing of financial products and services in the UK is clear, fair, and not misleading, and consistent with the sustainability profile of the product or service, i.e. proportionate and not exaggerated. This will also apply to FCA-regulated firms approving promotions for unauthorised persons.



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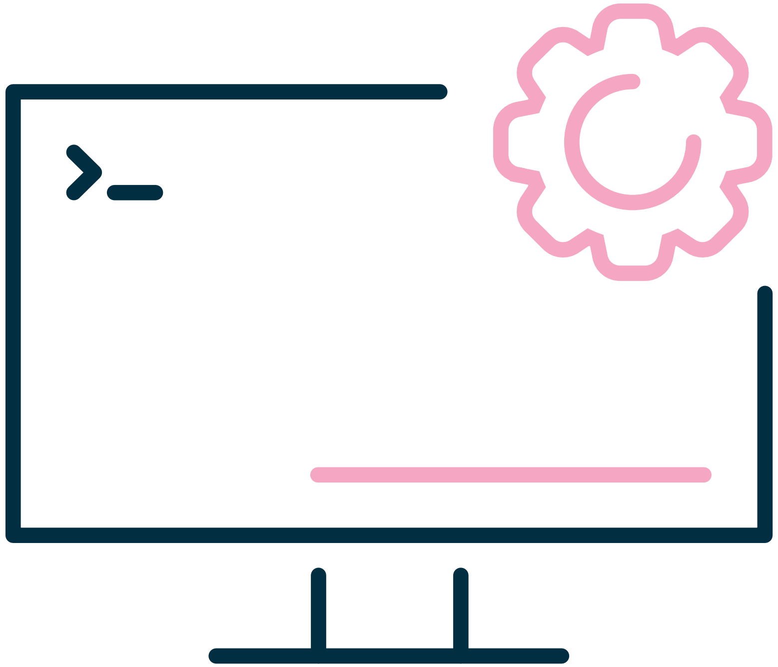
Distributors

The FCA recognises that its regulatory intervention will be less effective if the sustainable investment labels and accompanying disclosures are not communicated to retail investors. The FCA has proposed requirements for distributors of products to retail investors, which aim to ensure that product-level information is made available to such investors. These include:

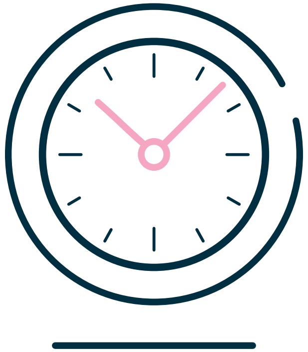
- Where distributors offer in-scope products that have a sustainable investment label to retail investors, distributors must display the label prominently in the relevant digital medium (e.g. product webpage) and provide access to the accompanying consumer-facing disclosures.

- Distributors must keep the relevant digital medium and marketing communications updated with any changes a firm makes to the labels and disclosures.

- In relation to overseas products (which are not currently in scope of the proposed SDR regime) which use prohibited sustainability-related terms, distributors of those products to retail investors must place a notice alerting retail investors that “This product is based overseas and is not subject to FCA sustainable investment labelling and disclosure requirements”. This should be prominent on the relevant digital medium with a hyperlink to the FCA webpage, which will set out what the labelling and disclosure requirements are, for retail investors that wish to know more.



Timing



When the FCA originally released the CP in October 2022, it was all set to publish its final rules by 30 June 2023. The broad-brush anti-greenwashing rule was also due to come into force on the same date while the labelling and disclosures reforms were scheduled for 2024.

However, in a statement made on 29 March 2023, the regulator said it is "carefully considering" the 240 written responses it received to the CP. This statement came just weeks after the head of an industry body urged the regulator to change a number of its original proposals as they excluded too much of the industry. The chief executive of the Investment Association told a Treasury sub-committee that if the FCA's proposals were to go ahead in their current form, between 60 and 70 per cent of all retail investment products would be excluded.

The FCA has now delayed its implementation of the SDR and the labelling regime and it is now intending to publish a policy statement in the third quarter of this year (2023). This, of course, will have a knock-on effect on the timeline for implementation of the anti-greenwashing rules as well as the labelling and disclosures reforms.

The FCA is also carefully considering the feedback to ensure that the proposed regime not only protects consumers but also recognises and takes account of any practical challenges that firms may have. This includes reviewing the marketing restrictions in the draft regulation, refining some of the specific criteria for the labels and clarifying how different products, asset classes and strategies can qualify for a label.

Whilst feedback received has shown broad support for the proposed regime and the outcomes that the FCA is seeking to achieve, many industry experts agree that there is scope for the regime to be more streamlined and provide more clarity (especially in relation to some of the classification criteria for the labels). For example, a key criticism of the proposals was a lack of consideration for multi-asset and blended strategies, which the FCA has assured will now be factored into the policy statement. The FCA will also clarify areas such as primary and secondary channels for achieving sustainability outcomes which are no longer prescribed, and that the FCA does not in fact require independent verification of a product's categorisation to qualify for a label.

This goes to show the complexity of the proposals and the scale of the feedback from industry experts. All this needs to be fully considered and carefully interwoven in the FCA's final rules.

How can we help?

Firms should be engaging with the content of the CP so that they are set to implement the final rules which are being published in the third quarter of 2023.

As part of this process, we have set out below, what firms need to be considering:

- Is the firm or are any of the firm's products 'in scope'?
- Do the 'in-scope' products meet the FCA's classification criteria (including the five overarching principles, the cross-cutting criteria and the category-specific criteria)?
- Determine what label applies to the 'in-scope' products
- In terms of the products that are already marketed as 'sustainable', what strategic and governance changes need to be made to ensure that these products meet the strict requirements of the labelling regime?
- What actions should firms take if their products have a sustainable investment label (particularly focussing on how these products are managed, monitored and marketed)?

At Freeths, our financial services team brings together a range of specialists from different legal service areas who have genuine sector expertise. Our team acts for a range of financial services clients including fund operators and managers, wealth managers and financial advisers. We can advise on all aspects of the new SDR regime, including whether or not your firm or the products that you are offering are 'in-scope' and whether they qualify for a sustainable investment label and how this can be reflected in the overall 'investment policy' and 'strategy'.

For further information, do not hesitate to contact Adam Edwards or George Metcalfe for a confidential, no-obligation discussion to review what support we can give you.

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Accreditations

The Legal 500 United Kingdom Leading Firm 2023

Chambers Top Ranked UK 2023 Freeths LLP

Chamber Excellence Awards 2021 Recognition of Excellence

The Legal 500 Green Guide United Kingdom 2022 Recommended Firm

Business Disability Forum Member

Top 75 Employer — Employer Index 2020 — Social Mobility Foundation

2021 Chamber Business Awards Regional Winner — The Equality Trailblazer

Stonewall Diversity Champion

Cyber Essentials Certified

Lexcel Practice Management Standard Law Society Accredited

British Assessment Bureau UKAS Management Systems 8289 ISO 9001 Quality Management

British Assessment Bureau UKAS Management Systems 8289 ISO 14001 Environmental Management

British Assessment Bureau UKAS Management Systems 8289 ISO 27001 Information Security Management

British Assessment Bureau UKAS Management Systems 8289 ISO 22301 Business Continuity Management

Investors in People Silver

Thank you