

Sustainability Report

1 April 2025 – 31 March 2026

ALCS

About this Report

This report covers ALCS's sustainability performance for the period 1 April 2025 to 31 March 2026, aligning with the organisation's financial reporting cycle. It has been prepared in accordance with Global Reporting Initiative (GRI) standards and marks the second annual Sustainability Report produced by ALCS. For feedback or enquiries, please contact: communications@alcs.co.uk.

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Message from the *Chair*

This has been a year of real progress for ALCS. We collected more for writers than ever before and we did so while the landscape for the creative industries continued to shift, above all because of artificial intelligence.

On AI, our position is clear. Writers should have control over how their work is used and a fair share of the value it creates. That is why the training licence we are developing with Copyright Licensing Agency and Publishers' Licensing Services works on an opt-in basis. It is also why I am proud that ALCS is now paying writers for AI uses in the workplace for the first time. Licensing works, and it can work for new technologies too. We will keep making that case to Government and Parliament.

Good governance underpins all of this. This year we completed the changes arising from our 2024 Governance Review and welcomed two new directors to the Board. We continue to maintain strong gender balance across the organisation and its leadership, and to invest in staff wellbeing and development.

We also need to be candid about where there is more to do. Our measured carbon footprint rose this year. That is partly because we are capturing data more fully, but it is also because of increased travel. The Board will be looking for a clear plan to reduce our impact, and for targets we can report against next year. Embedding sustainability in our decision-making means acting on what this report tells us, not only measuring it.

Lord Tim Clement-Jones

ALCS Chair

Message from the *Chief Executive*

This year has demonstrated what can be achieved when a clear purpose is matched by the commitment and expertise of our people. Across ALCS, colleagues have worked together to deliver excellent service for members while continuing to strengthen the organisation for the future.

A key focus this year has been listening and learning. Through member research, focus groups and our Listening Day, we gathered valuable insights into how writers want to engage with ALCS. That feedback informed our rebrand and continues to shape how we communicate, develop services and represent our members.

We have also continued to invest in organisational resilience through enhanced data security, achieving Cyber Essentials Plus accreditation and developing systems that will support more effective rights management in the years ahead. These investments are essential to maintaining trust, improving efficiency and delivering value for members.

This report demonstrates our continued commitment to operating responsibly and transparently. While there is more work to do, we are strengthening our reporting, improving our understanding of our impacts and building a solid foundation for future progress.

Barbara Hayes

Chief Executive

Business and Sustainability *Highlights* 2025 - 2026

Collection and distribution

This year, we collected our highest ever amount £47,596,456 (2025 £45,234,921), an increase of 5.2%.

The distribution paid to Members and overseas societies was £45,777,136 (2025 £47,488,750), a decrease of 3.6%, but still the second highest amount we have distributed. While this is lower than the amount collected, it is not always possible to distribute the licence income collected in any one year in the same year. Details of the ALCS distribution policy can be found on the company's website.

Security and innovation

The organisation advanced its innovation in rights management through continued development of a bespoke system designed to enhance the management of secondary rights and intellectual property.

To strengthen organisational resilience, all staff received regular cybersecurity training and ALCS importantly achieved Cyber Essentials Plus accreditation as the latest step in our cybersecurity programme.

As part of our ongoing work to strengthen our digital security, we have been working on a plan to introduce multi-factor authentication for members accessing their online accounts. Initially, this additional layer of security will be optional, giving members the choice to verify their identity by email, phone or through an authenticator app. This will provide greater protection against unauthorised access while giving members the flexibility to choose the method that works best for them.

Developing revenue opportunities

During the reporting period, ALCS introduced AI workplace permissions into the licensing scheme for non-training uses. These permissions mean that writers can be remunerated when parts of their published works are used as prompts for AI tools in the workplace. By the time of publication of this report, ALCS will have distributed money for these uses involving AI for the first time, marking an important realisation that licensing can continue to provide an effective mechanism for paying creators as new technologies and uses emerge.

In last year's report, we noted that we were working with our partners at the Copyright Licensing Agency (CLA) and Publishers' Licensing Services (PLS) to develop a licence for AI training. That work has continued and to support this we introduced a Preference Centre within the Members' Area of our website which allows eligible members to quickly and easily decide which works, if any, they wish to include in the CLA Generative AI Training Solution. The Preference Centre allows members to opt in or out the entirety of their works for ease and simplicity, or to set their preferences on a granular work-by-work basis.

Central to our approach is the principle that authors should have control and choice over what happens to their work. That is why the licence operates on an opt-in basis: creating the possibility of payment for those who wish to participate, while fully respecting the wishes of those who do not. There is still much to be resolved around AI, copyright and the future market for creative work, but our starting point is straightforward: writers should have a say in how their work is used, and they should share in the value it creates.

ALCS remained active in the development of the Audiovisual Licensing Alliance (AVLA), a consortium aimed at licensing different sectors for use of audiovisual works in public spaces. AVLA operated its first full year of licensing this year with payments to writers scheduled to take place in 2027.

Understanding our members

We held a Listening Day in June 2025, a day dedicated to listening to our members about how we communicate and present ourselves visually. As part of that, we surveyed our members on our branding, events and written communication, as well as externally hosting three dedicated focus groups with members. The valuable feedback we received informed our visual rebrand in January 2026.

During the reporting period, we held two additional member focus groups in Edinburgh and York, each followed by a town hall reception. These events gave members the opportunity to share their experiences and concerns directly with ALCS, while also learning more about our work and priorities and providing a valuable space to network with other local writers.

ESG

Environmental

On the environmental front, ALCS offsets unavoidable carbon emissions and supported landlord-led sustainability initiatives in energy, waste, and water management.

Social

Reflecting its commitment to equity and inclusion, ALCS maintains a balanced workforce. Gender representation remains consistent across all organisational levels, with women holding 53% of senior positions. We have a three-year people strategy, including targets for attraction, retention, reward, wellbeing, development, and career pathways.

Governance

The last of the changes following the Governance Review in 2024 have now been implemented. There will be another external review in 2029, with internal reviews taking place every three years.

Introduction to ALCS

Organisational details

ALCS is a not-for-profit, membership, collective management organisation, with over 130,000 members. ALCS is open to all types of writers and owned by our members. Our primary purpose is to collect and distribute money for and to writers, when their works have been used. The money we collect is for 'secondary uses' of their work – such as cable retransmission, digital reproduction and educational recording. Since 1977 we have paid over £790m to our members.

Entities included in ALCS's sustainability reporting

This report covers the work of ALCS and does not include any information relating to other organisations that ALCS is associated with, such as the International Authors Forum.

Activities, value chain and other business relationships

ALCS is a collective management membership organisation for writers of all types. We typically collect money for writers when their works have been used outside of their primary contracts.

Our primary functions are:

- the collection of data and income on writers' works - significantly from the Copyright Licensing Agency (CLA) and Educational Recording Agency (ERA) in the UK
- the allocation of works data and associated payments to individual writers (the processing of data)
- making payments (distributions) to our writer members twice a year
- carrying out membership recruitment activities
- carrying out account management services for existing members
- raising awareness of writers' issues at a governmental level and ensuring that writers' remuneration is protected and promoted

Employees

On 31 March 2026 ALCS had 46 employees working predominantly from our London offices and remotely. The average number of employees throughout the year was 44. The overall gender split is 52% female and 48% male.

ALCS does not take on temporary employees or employees on a non-guaranteed hours basis. At 31/3/26, ALCS employs full-time (34) and part-time employees (12). Of 46 staff, five were fixed-term employees.

Table 1: ALCS Workforce by Level and Gender on 31 March 2026

Level (Band)	Male	Female	Total
Professional	14	15	29
Management	5	5	10
Executive	3	4	7
Total	22	24	46

Purpose, vision and values

Our purpose

ALCS exists to ensure writers are paid fairly and to fight for their rights.

Our vision

We support our members' ability to write by enhancing their income through collective licensing. We fight for their rights and give them a powerful collective voice. We make the complex easy.

Our values are important to us

Be bold

We support our members by being proactive and forward thinking. We develop new streams of income and protect existing ones for the benefit of our members. We advocate to legislators to better support writers.

Take pride

We strive to be the best we can in all of our activities. We are proud to be ambitious for writers and to celebrate our successes.

Have an impact

We champion the protection and promotion of writers' rights across the globe and ensure that they are fairly paid when their works are used.

Sustainability at ALCS

Materiality assessment

In 2024 ALCS undertook a formal sustainability and ESG benchmarking exercise and materiality assessment with Multiverse Consultants. The benchmark analysis included the Global Reporting Initiative (GRI) standards and SASB guidance for the professional and commercial services, education and internet media and services sectors.

Based on the benchmarking exercise, peer review, and engagement with Board members, the following six issues are considered to be material for ALCS:

1. **Governance, compliance and ethics**
2. **Intellectual property, data security and innovation**
3. **Financial performance**
4. **Stakeholder engagement and relationships**
5. **Corporate culture, talent management and employment practices**
6. **Environmental management, disclosure and reporting**

Management of material topics

ALCS's management and performance on these six material issues are described and explained in this Sustainability Report. The Report's overall contents and format have been aligned with and structured around the organisation's material sustainability issues and the relevant disclosure requirements of GRI and SASB services sector standards.

Sustainability Governance and Strategy

Statement on sustainable development strategy

ALCS's sustainable development strategy is grounded in our mission to support and champion writers, while operating responsibly and ethically as a not-for-profit collective management organisation. Given our size and scope, our approach focuses on embedding sustainability into our governance, operations, and stakeholder relationships in a proportionate and meaningful way.

Role of the highest governance body in overseeing the management of impacts

The ALCS Board plays a central role in overseeing the management of sustainability-related impacts. The Board is responsible for approving the organisation's sustainability strategy and ensuring alignment with our values and long-term objectives.

Delegation of responsibility for managing impacts

Responsibility for managing sustainability impacts is delegated to the Senior Leadership Team, which is tasked with implementing relevant policies, monitoring performance, and reporting progress.

Role of the highest governance body in sustainability reporting

The ALCS Board has responsibility for signing off the material issues that ALCS is reporting on and representatives from the Board were involved in the materiality assessment process.

Collective knowledge of the highest governance body

ALCS ensures that its Board of Directors possesses the collective knowledge required to effectively oversee the organisation's strategy, governance, and sustainability impacts. All Board members undergo relevant training to equip them with expertise in sustainability, governance, and sector-specific issues. This includes briefings on ESG matters, updates on regulatory developments, and insights from external consultants such as those engaged for ALCS's materiality assessment and benchmarking exercises.

The Board's composition —comprising both appointed professionals and elected writer members — brings a diverse range of perspectives and experience, enhancing its ability to make informed decisions. Knowledge-sharing is embedded in Board processes, with committee participation, regular reviews, and strategic discussions ensuring that members remain engaged and informed on key issues affecting ALCS and its stakeholders.

1. Governance, compliance and ethics

Governance Structures

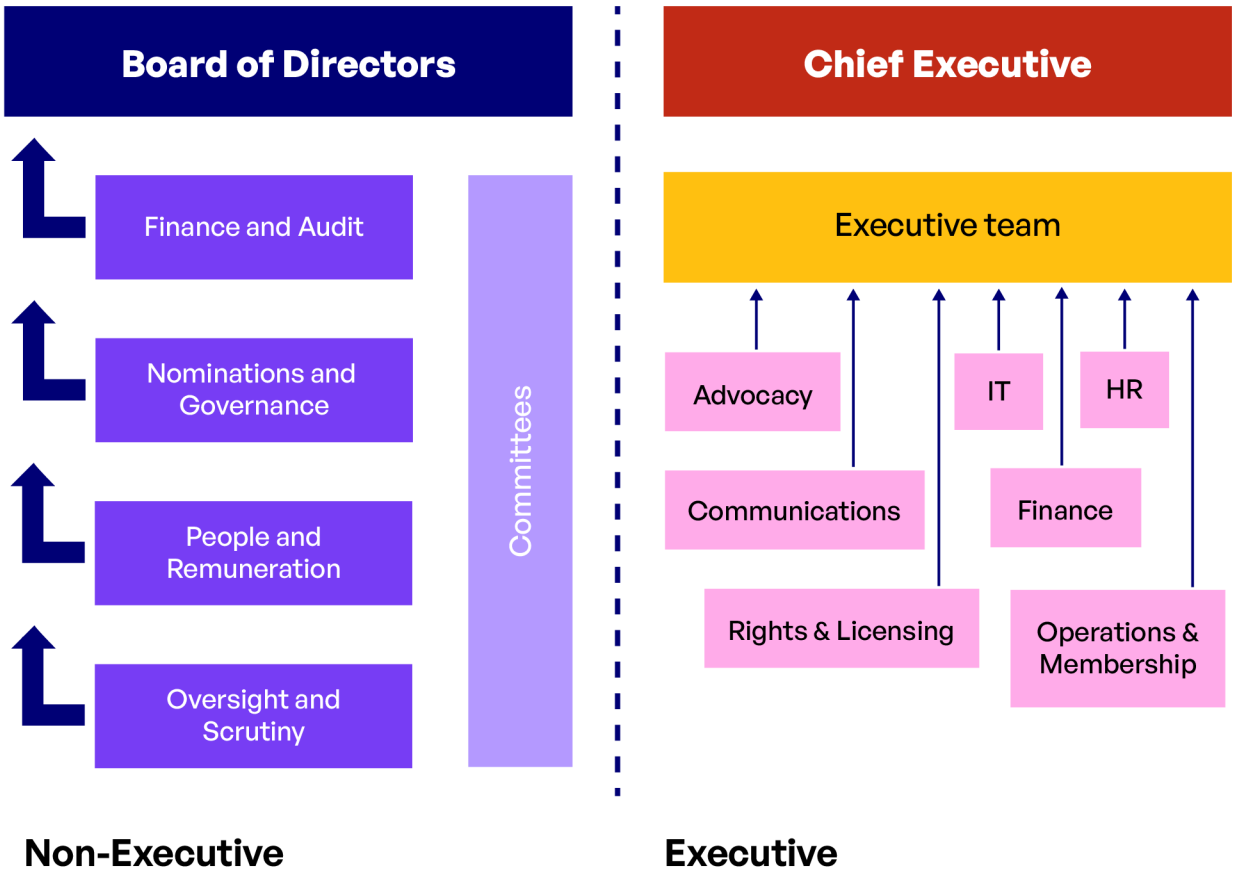
The ALCS Board consists of an appointed Chair, the Chief Executive and up to three appointed and six elected writer members.

The Nominations and Governance Committee defines which Board members sit on each committee.

ALCS Board

Table 2: ALCS Board members and their dates of appointment for the reporting period (1 April 2025 – 31 March 2026).

Name	Position
Lord Tim Clement-Jones	*Chair*
Barbara Hayes	*Chief Executive and Executive Director*
Rachael Davis-Featherstone	*Non-Executive Director*
Chun Kit Fan	*Non-Executive Director and Deputy Chair*
Melissa Franks	*Non-Executive Director from November 2025*
Maggie Gee	*Non-Executive Director to November 2025*
Timandra Harkness	*Non-Executive Director from November 2025*
James McConnachie	*Non-Executive Director to November 2025*
Okechukwu Nzelu	*Non-Executive Director*
Katharine Quarmby	*Non-Executive Director*
Edwin Thomas	*Non-Executive Director*


Board of Directors
Finance and Audit
Nominations and Governance
People and Remuneration
Oversight and Scrutiny
Committees
Chief Executive
Executive team
Advocacy
IT
HR
Communications
Finance
Rights & Licensing
Operations & Membership
Non-Executive
Executive

In accordance with the Collective Management of Copyright (EU Directive) Regulations 2016, the Board meets at least once a year to fulfil the 'supervisory function' required by the regulations. This involves the Chairs of the various Board Committees reporting back to provide the necessary reassurance in areas such as risk management and to confirm that the policies approved by the members are being adhered to. At the Annual General Meeting, the ALCS Chair provides a brief report to the members confirming the operation of the supervisory function.

Membership of committees and relevant dates

Table 3: Board Committee composition and dates of appointment

	Finance & Audit (meets 4 x per year)	**Nominations and Governance (meets 3 x per year)**	**People and Remuneration (meets 2 x per year, or as needed)**	**Oversight and Scrutiny (meets 6 x per year)**
Chaired by:	Edwin Thomas	Tim Clement-Jones	Okechukwu Nzelu	Katharine Quarmby from December 2025
Non-Exec	Rachael Davis-Featherstone	Rachael Davis-Featherstone	Katharine Quarmby	Okechukwu Nzelu
	Kit Fan	Okechukwu Nzelu	Melissa Franks from December 2025	Timandra Harkness from December 2025
	Katharine Quarmby from December 2025	Edwin Thomas		
	James McConnachie to November 2025	Maggie Gee to November 2025	Maggie Gee to November 2025	Maggie Gee to November 2025
External	Debbie Rees to November 2025		Joanna Squire	

Nomination and selection of the highest governance body

The ALCS Board consists of up to three appointed and six elected writer members.

Appointed members

The Nominations and Governance Committee identifies and recommends to the ALCS Board the skills and knowledge required for any new board members sought. The post is advertised and a panel comprising Board members, the Chair, HR representatives from ALCS and the Chief Executive would identify suitable candidates. Candidates are then invited to interview, and when appointed, are approved as a new Director by the ALCS Membership at the subsequent AGM. Appointed Directors are recruited on an annual basis for the first three-year period and, should their skills still be needed at the end of that period, the final three years are on a contractual basis, with a total maximum of six years being served.

Elected members

The Nominations and Governance Committee identifies and recommends to the ALCS Board the skills and knowledge required for elected positions available on the Board. The vacancies are advertised and members of ALCS are invited to nominate themselves for the position of Board Director. They are required to be endorsed by four other ALCS members and to provide a personal statement explaining how they meet the required criteria. The Nominations and Governance Committee reviews candidate statements to ensure all applicants meet agreed criteria prior to being put on the ballot for election. All Ordinary and Successor members of ALCS are eligible to vote for the candidates, and the results are announced at the subsequent AGM.

Elections are conducted for ALCS by Civica Election Services and elected members of the Board of Directors are appointed for a three-year period.

Elected and appointed Board members are only able to sit for two consecutive terms (six years), with the potential for the Board to renew for a further term of three years if the skills and experience of that Board member are conducive or beneficial to the management of the affairs and business of the Company.

Chair of the highest governance body

Lord Tim Clement-Jones was appointed Chair of ALCS in March 2025.

Kit Fan has been the Deputy Chair of ALCS since September 2024.

Evaluation of the performance of the highest governance body

A review is held annually to:

- review the work of the Board and its committees
- review the setting of standards of performance, evaluate management performance, and analyse financial reports
- assess the effect of its own role

Remuneration policies

ALCS has a performance management process in place for staff which determines the level of pay increase that each staff member receives. This performance management process is overseen by the People and Remuneration Committee, as are pay recommendations approved by the People and Remuneration Committee.

Board remuneration is recommended by the People and Remuneration Committee, approved by the Board and included as a voting item for members at each Annual General Meeting. Board remuneration is externally benchmarked every three years.

Process to determine remuneration

Executive job roles at ALCS are benchmarked on an annual basis with an external benchmarking provider, and all roles are defined within a clear payment structure.

Pay increases are awarded in line with the ALCS performance management process. The People and Remuneration Committee of the Board agrees the % increases given in line with the budget agreed by the Finance & Audit Committee.

Annual total compensation ratio

The current compensation ratio for ALCS staff is: 4.5 to 1

This is calculated as the ratio of the annual total compensation of the CEO, to the median annual compensation of all employees (excluding the CEO).

Compliance

Conflicts of interest

ALCS has a conflict-of-interest policy that covers the Board of Directors. Prior to every Board meeting each member of the Board is required to declare any conflicts that they consider to be of relevance.

During the reporting period (1 April 2025 – 31 March 2026) there were no conflicts of interest raised.

Regulatory Compliance

As at 31 March 2026, ALCS had zero regulatory non-compliances, fines, ongoing or pending legal actions to report.

Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

As at 31 March 2026, ALCS had zero legal actions for anti-competitive behavior, anti-trust, and monopoly practices.

Political contributions

ALCS does not make contributions or payments to political parties.

Business Ethics and Code of Conduct

ALCS is committed to maintaining the highest standards of ethical conduct across all areas of its operations. As a collective rights management organisation, ALCS is also bound by the Collective Management of Copyright (EU Directive) Regulations 2016.

Policy commitments

There are policies in place which include commitments to ethical investment and fair employment practices. ALCS has a code of conduct for members, as required by the Copyright Directive regulations, and produces an Annual Transparency Report which is overseen by the Government Intellectual Property Office (IPO).

Embedding policy commitments

The policies are regularly reviewed by the Senior Leadership Team and reinforced through training, leadership oversight and the performance management process.

Mechanisms for seeking advice and raising concerns

ALCS maintains clear mechanisms for seeking advice and raising concerns. Staff are encouraged to raise ethical or compliance-related issues through their line managers or via a designated Board member responsible for whistleblowing. This process is supported by a formal whistleblowing policy, which ensures confidentiality and protection for individuals who report concerns.

Anti-corruption

ALCS has a formal anti-bribery policy in place. The policy applies to all staff and sets clear expectations for behaviour in relation to gifts, financial transactions or any other form of inducement.

Operations assessed for risks

During the reporting period, no incidents of bribery or corruption were reported and ALCS continues to monitor its operations for potential risks.

Communication and training about anti-corruption policies and procedures

Staff are made aware of expected standards of conduct regarding gifts, financial transactions and third-party relationships through leadership oversight. Ethical concerns can be raised through line managers or the designated Board member responsible for whistleblowing.

Confirmed incidents of corruption and actions taken

There have been no confirmed cases of corruption during the reporting period.

Critical risk management

ALCS has a formal risk management policy and process that is reviewed regularly by the Finance & Audit Committee. This process includes the identification, assessment, and monitoring of key operational, financial, and compliance-related risks. The corporate risk register is maintained and updated to reflect emerging risks and mitigation strategies.

Communication of critical concerns

Critical concerns and risk-related updates are communicated to employees using a variety of mechanisms, through one-to-one conversations, using email, through regular team meetings and all-staff meetings, ensuring transparency and organisational awareness. This approach supports a culture of accountability and enables timely responses to potential threats.

Procurement Practices

ALCS does not have a procurement policy, but has a purchasing policy which applies to all suppliers above a specific level of expenditure (currently £20,000)

Proportion of spending on local suppliers

ALCS considers local suppliers to be suppliers based in the UK – we currently spend 86% on local suppliers. These are mainly services and not goods.

2. Intellectual Property, Data Security and Innovation

ALCS continues to invest in innovation and research to enhance its services, protect intellectual property, and support its members in a rapidly evolving digital landscape. As mentioned earlier, ALCS is involved in the development of an AI training licence that will provide a new revenue stream for members. The organisation continued to advance the development of a bespoke system designed to improve the management of secondary rights, demonstrating ALCS's commitment to technological innovation.

Cybersecurity remains a priority, with regular training and testing ensuring staff are equipped to identify and respond to digital threats, safeguarding member data and organisational integrity. During the course of the year ALCS was also accredited with Cyber Essentials Plus certification.

ALCS also continued its involvement in the Audiovisual Licensing Alliance (AVLA), supporting cross-sector innovation in rights management and licensing, reflecting ALCS' proactive approach to research and development.

Customer Privacy

ALCS has a Personal Data and Privacy Policy that members confirm that they have read and understood upon signing up for membership of ALCS. The full policy sets out the personal data processed by ALCS in its role as a Collective Management Organisation (CMO). The policy can be found on the ALCS website

Data security

ALCS will take appropriate technical and organisational measures to protect the personal data we transmit, store or otherwise process against accidental or unlawful destruction, loss, alteration or unauthorised disclosure or access.

The members' area of the ALCS website requires entering a username/email address and password which is encrypted and known only to the member. The data that members provide online to ALCS is also encrypted, protected by Secure Sockets Layer (SSL) encryption technology. The ALCS members' area is secured and hardened against attacks according to industry best practices and is regularly tested to ensure security provisions remain adequate. Bank account information is never returned fully to members in their online account (account numbers are masked out, e.g. ****1111).

All paper membership application forms are scanned into electronic format and stored on a database which is password and firewall protected. The paper copies are shredded and disposed of in our confidential shredding facility. On a daily basis members' personal data is backed up securely.

Data files shared by ALCS with third parties are password protected. Data stored on ALCS laptops and portable devices is encrypted. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, although ALCS strives to protect members' personal data online, including through use of encryption and other measures, we cannot guarantee the security of any internet communication or transmission.

Prior to introducing new systems or technologies relevant to the processing of personal data, ALCS will undertake the necessary impact assessments with a particular focus on any associated risks.

The full policy can be viewed on the ALCS website

3. Financial performance

Direct economic value generated and distributed

- The income collected for writers in 2025/26 was £47,596,456
- The amount distributed to members was £45,777,136
- The investment portfolio generated £2,007,536 of interest and dividends
- The wages and salaries for the ALCS staff were £2,169,572
- Pension costs were £400,832 and other staff costs (benefits) came to £195,266
- The actual commission rate charged to members after a commission refund was 9%

Financial implications and other risks and opportunities due to climate change

Due to the nature of ALCS' business, the scale of our operations and our business activities, climate change is not currently assessed as having material financial implications for the organisation. This assessment, including consideration of our investment portfolio, is kept under regular review by the Finance and Audit Committee.

Defined benefit plan obligations and other retirement plans

ALCS contributes to a defined contribution scheme for each employee regardless of status from day one.

Financial assistance received from government

ALCS did not receive direct or indirect financial assistance from governments during the reporting period.

4. Stakeholder engagement and relationships

Stakeholders and Engagement

ALCS has a wide range of stakeholders: our employees, members, suppliers, sister organisations, the general public and legislators.

We engage and work closely with all of these groups so we can understand and address any issues of particular interest. Feedback plays a vital role in shaping our strategy and priorities. We actively use various feedback mechanisms to guide our work, including member focus groups and the Listening Day as mentioned previously.

Our stakeholders and the means of engagement we may use are shown below:

Table 4: ALCS's Stakeholder and Engagement Channels

Stakeholder	Channels of engagement
Employees	*Company intranet, staff newsletters, staff surveys and feedback forms, website, all-company meetings and events, monthly 'Towerside Talks', training programmes, regular team meetings, team building and performance reviews*
Members	*Corporate website, regular newsletters, social media presence, ALCS podcast, events and receptions, focus groups (online and in person), new member meetings (online), member surveys and feedback forms*
Value chain (suppliers and customers)	*Frequent meetings, negotiations of terms and conditions, sector conferences, seminars and exhibitions*
Sister organisations	*Corporate website, social media presence, email, attendance at events*
General public	*Corporate website, social media presence*
Legislators	*Corporate website, ALCS News, social media presence, meetings, events*

Memberships and Partnerships

Membership associations

During this period ALCS has been a member or observer of the following organisations:

- The Alliance for IP
- All Party Parliamentary Writers' Group (APWG) (Group Administrator)
- Audiovisual Licensing Alliance (AVLA)
- British Copyright Council (BCC)
- International Confederation of Societies of Authors and Composers (CISAC)
- Copyright Licensing Agency (CLA)
- Creative Rights in AI Coalition (CRAIC)
- Creators Rights Alliance (CRA)
- Educational Recording Agency (ERA)
- International Authors Forum (IAF)
- International Federation of Reproduction Rights Organisations (IFRRO)
- Society of Audiovisual Authors (SAA)

5. Corporate culture, talent management and employment practices

ALCS takes immense pride in our dedicated team, whose passion fuels our collective achievements. We recognise that our strength lies in the unique perspectives and talents of our colleagues, and we are committed to fostering an inclusive and supportive environment where everyone can flourish. Our aim is a thriving organisation, with ethical, progressive and performance practices where individuals can develop their skills and innovation as an everyday event.

We also know that our work extends beyond just the literary world. We are conscious of our broader responsibilities—both to society and the environment. Our ongoing efforts in Environmental, Social, and Governance (ESG) initiatives and our dedication to Equity, Diversity, and Inclusion (EDI) are not just statements but integral parts of how we operate and grow as an organisation. The ALCS EDI policy can be found on our website

The following sections provide details of ALCS employment standards and metrics for the reporting period.

Employment Practice and Standards

Ratios of standard entry level wage by gender compared to local minimum wage

ALCS complies with the minimum wage requirements of the United Kingdom.

Proportion of senior management hired from the local community

All of ALCS senior management are from the United Kingdom.

New employee hires and employee turnover

Table 5: Employee turnover during the reporting period

	Female	Male	Total
New Hires	1	2	3
Leavers	2	2	4

Benefits provided to full-time employees that are not provided to temporary or part-time employees

All employees have equal access to the benefits offered by ALCS regardless of the type of contract they have – some of our benefits are offered to all from day one of employment, whereas other benefits are available following the successful completion of the probationary period.

The full range of benefits offered to staff is as follows:

- *life insurance;*
- *health care;*
- *disability and invalidity coverage;*
- *parental leave;*
- *enhanced maternity leave;*
- *pension scheme (12.5% paid by ALCS);*
- *bonus scheme;*
- *employee assistance programme*

Family leave

The following occurred in the reporting period:

- two members of staff returned from maternity leave
- one member of staff took paternity leave and returned to work
- one member of staff took parental leave and returned to work

Minimum notice periods regarding operational changes

ALCS does not have collective bargaining agreements in place. However, in line with UK employment law and our internal HR policies, employees are provided with a minimum notice period of **four weeks** for significant operational changes that may affect their roles or working conditions. Where possible, ALCS seeks to provide longer notice periods and engages in open communication to ensure transparency and support during any transition.

Incidents of discrimination and corrective actions taken

There were no reports of discrimination or harassment cases recorded during the reporting period.

Freedom of Association and Collective Bargaining

ALCS operates exclusively in the United Kingdom, where the rights to freedom of association and collective bargaining are protected under national law. During the reporting period, ALCS identified no operations or suppliers at significant risk of violating these rights. ALCS complies fully with UK employment legislation and supports an open and transparent workplace culture where employees can raise concerns freely.

Employee Diversity, Equity, Inclusion and Culture

Diversity of governance bodies and employees

Table 6: The number of staff at each level on 31 March 2026

Level (Band)	20-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	60+	18-19	Total	%
Professional	2	5	7	4	5	2	2	2	2	0	31	67
Management	0	0	2	2	3	1	0	1	0	0	9	20
Executive	0	0	0	0	2	1	1	0	2	0	6	13

ALCS's Board of Directors and Executive Committee by gender at the end of the reporting period

Senior Leadership Team

Male – 3

Female – 4

Board

Male – 4

Female – 5

The female Chief Executive is reported in the figures for both the Senior Leadership Team and the Board on which she sits as an Executive Director.

Ratio of basic salary and remuneration of women to men

ALCS has an equal pay policy that is based on role and independent of gender.

Gender pay gap reporting is legally required for employers with 250 or more employees. The report has to be published showing the figures comparing men and women's average pay across the organisation.

ALCS has 46 employees therefore it is not legally required to publish the findings, however our Board requires that we monitor and report on this each year.

The Gender Pay Gap data is based on snapshot date of 5 April 2025:

Mean Gender Pay Gap: 7.04%

Median Gender Pay Gap: 13.68%

In order to match what is legally required of larger companies, ALCS has adapted its reporting period to fall in line with this. Following this government criterion means the reporting period on this occasion is all employed on 5 April 2025. Therefore, we cannot sensibly compare this data to last year's. In future years, we'll be reporting using the same criteria so we will be able to provide comparisons.

We continue to focus on investing in our people with learning and development tailored to individual needs, additional wellbeing initiatives and ongoing senior leadership support.

The Equity, Diversity and Inclusion project we have embarked on since September 2023 demonstrates our commitment to ensure equality and fairness are at the forefront of our business practices.

Career Development and Talent Management

At ALCS, we recognise that our people are central to our success. We are committed to fostering a workplace culture where individuals can grow, thrive, and contribute meaningfully. Career development is supported through regular one-to-one meetings between staff and managers, held at least four times per year, which include dedicated discussions on performance and future development goals.

Average hours of training per year per employee

This information is currently unavailable for disclosure purposes. ALCS has not historically recorded the number of hours spent on training and currently has a wide variety of training methods that could potentially be considered relevant. Our aim for the future is to define these different categories of training and subsequently capture the information to report effectively on it in future reports.

Programmes for upgrading employee skills and transition assistance programmes

ALCS places a strong emphasis on nurturing talent and supporting the professional growth of our employees. Career development is embedded in our performance management process, with structured one-to-one meetings held four times a year between staff and their managers. These meetings provide dedicated time to discuss individual performance, identify development goals, and explore future opportunities.

All staff have access to LinkedIn Learning, enabling them to pursue personalised training and skill-building. Managers are encouraged to conduct departmental skills audits to identify gaps and ensure targeted development. Company-wide training needs are identified collaboratively by managers, HR, and the Senior Leadership Team, with relevant courses arranged accordingly. Mandatory training, including cybersecurity, is delivered to all employees to maintain high standards across the organisation.

Percentage of employees receiving regular performance and career development reviews

All staff have regular performance and career development reviews as part of the ALCS performance management process.

Occupational health and safety

Occupational health and safety management system

ALCS occupies fully serviced offices within a WeWork establishment, for our 46 staff. Staff work on a hybrid basis, working from home several days a week. ALCS complies with the landlords' arrangements for occupational health and safety management.

Workers covered by ALCS's OHS management system

All staff are covered by ALCS' Health and Safety Policy.

Promotion of worker health

ALCS is committed to fostering an inclusive and supportive environment where everyone can flourish.

ALCS offers a good work-life balance to all employees, including a flexi-time scheme, flexible working options and family-friendly policies. To support the health and wellbeing of staff, we offer access to an employee assistance programme and private medical insurance, as well as training managers and specific staff members in mental health first aid.

Worker participation, consultation, and communication on OHS

ALCS has a dedicated internal communications channel that is used for HR and health and safety matters alongside email, team meetings and all company meetings.

Worker training on occupational health and safety

All staff are required to carry out regular health and safety training in accordance with ALCS' health and safety policy.

Work-related injuries

There were no occupational health and safety related injuries recorded during the reporting period, so the Recordable Incident Frequency Rate per 1,000,000 hours for the overall company is zero.

Work-related ill health

There were 0 work-related ill-health cases reported during 2025/26.

6. Environmental management, disclosure and reporting

ALCS seeks to minimise its environmental impact. Any inescapable carbon footprint is offset using reputable carbon offset schemes.

Climate change and carbon reduction

We have a responsibility to ensure that we are operating in a way that has as limited an impact as possible on the environment around us.

ALCS staff work in a hybrid way; we work from a WeWork co-working space in London where we support our landlord's sustainability initiatives, including energy efficiency and waste reduction.

Due to the nature of our operations and tenancy within a shared co-working space, direct control over energy and emissions data is limited.

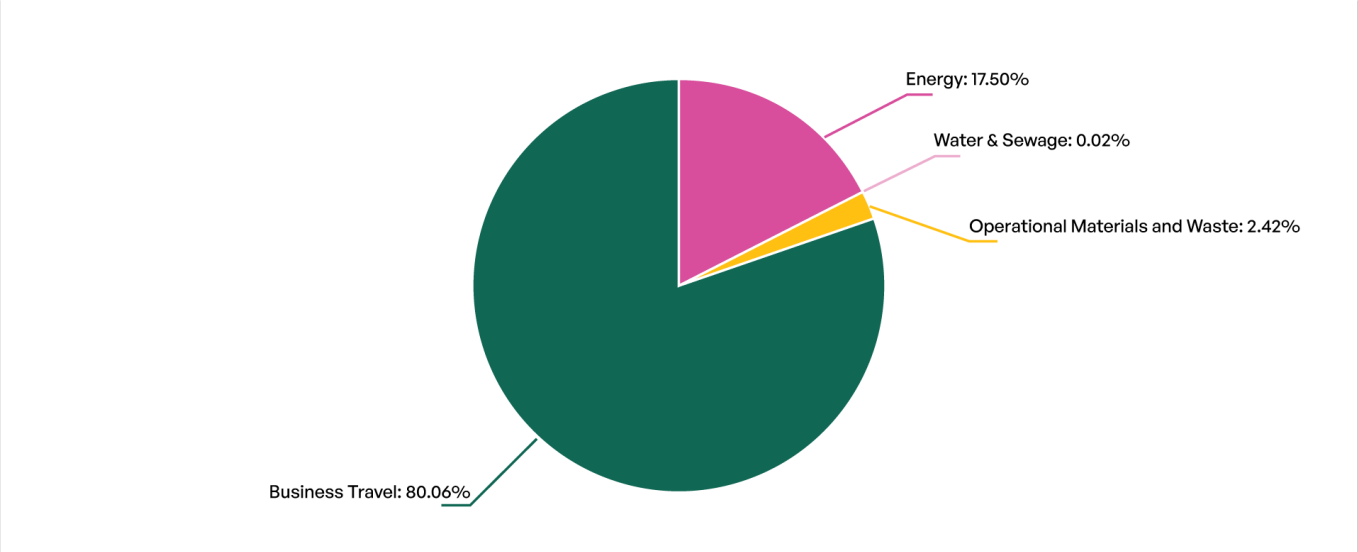
Our goal is to establish a baseline carbon footprint that enables us to track and improve our environmental performance year-on-year. We have used a tool called Creative Climate Tools to calculate our carbon footprint for the reporting period.

This calculation tool looks at information available for International House (the building within which the ALCS offices reside) and we have submitted details relating to our business travel tool, so the calculation includes:

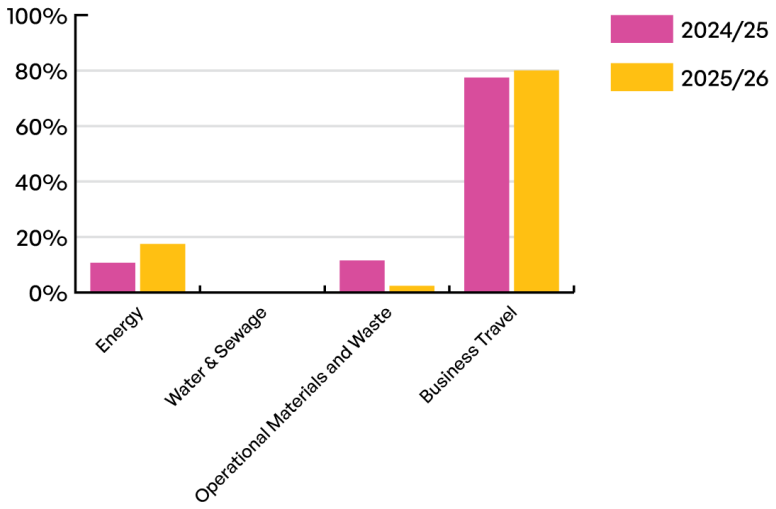
- Energy usage
- Water and sewage
- Operational materials and waste
- ALCS' business travel

The CO2e calculated for ALCS' specific office spaces within International House + Business travel is: **90.12 tonnes of CO2e**

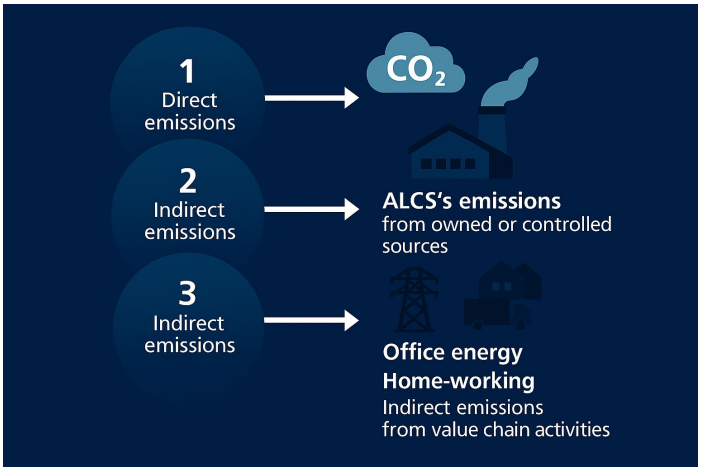
This is split up as follows:



Below is a year-on-year comparison to ALCS's carbon footprint:



The year-on-year increase in our reported carbon footprint is largely attributable to energy consumption and essential business travel. Higher energy emissions may, in part, reflect improvements in data capture and reporting, while business travel increased due to more frequent flights, including some long-haul travel.



Direct (Scope 1) GHG emissions

ALCS does not own any vehicles, buildings, or any other assets that burn fuel.

International House uses Gas, and these emissions have been included in the calculation carried out through the Creative Climate Tool.

Energy indirect (Scope 2) GHG emissions

ALCS' energy emissions have been included in the calculation carried out through Creative Climate Tool.

Other indirect (Scope 3) GHG emissions

ALCS' Business travel is included in the calculation carried out through the Creative Climate Tool.

Additional Scope 3 emissions we have been able to calculate are as follows:

Home-working

ALCS staff work, on average, two days in the office and three days at home. Using the Government Greenhouse Gas conversion calculator, the carbon emissions for ALCS, which includes office equipment and heating, is calculated as follows:

Annual FTE home-working hours (46 staff): 47,096

Homeworking CO2e calculation: **15.72 tonnes of CO2e**

Home-working emissions increased modestly from 14.9 tonnes CO_2e in 2024/25 to 15.72 tonnes CO_2e in 2025/26, driven by an increase in annual home-working hours from 43,428 to 47,096 as the workforce grew from 44 to 46 employees.

Investments

ALCS holds a number of investments, and we have shared the information available for each of the funds where comparable reporting is available:

- Columbia Threadneedle (as at 31 March 2026): 42.67 tonnes of CO_2 per $1m invested (Scope 1 & 2 only) **up 17.3%** since previous report
- Janus Henderson (as at 30 June 2025): 92 tonnes of CO2e per $1m invested, up **13.6%** since previous report
- Rathbones (previously known as Investec) (at time of writing, 16/9/26, outside of reporting period): Fund 1: 21 tonnes of CO_2 per $1m invested
  Fund 2: 14 tonnes of CO_2 per $1m invested
  Fund 3: 20 tonnes of CO_2 per $1m invested (Scope 1 & 2 only for each fund)

We're aiming to standardise these figures in future reporting where we can with the relevant investment companies.

Reduction of GHG emissions

Our approach includes:

- a responsible travel policy – to help us reduce our carbon footprint
- responsible investments – our investment policy incorporates ESG considerations to ensure that our financial decisions reflect our ethical standards and long-term sustainability goals

We are committed to continuous improvement and transparency in our environmental reporting in line with GRI standards. Our goal is to ensure that sustainability is embedded in our operations and decision-making, reflecting our values and responsibilities as a collective management organisation. Our aim is to develop a carbon 'footprint' that we can measure continuous improvement against.

Environmental Management

ALCS occupies fully serviced office space within a shared co-working environment. As part of our tenancy, we comply with the landlord's arrangements for energy use, water consumption, and waste management. These arrangements include participation in building-wide sustainability initiatives such as energy efficiency measures, recycling schemes, and responsible water usage. While ALCS does not directly control these systems, we actively support and align with the landlord's environmental practices to ensure our operations contribute to broader sustainability goals.

The following data was provided by WeWork, of which ALCS is a tenant.

Energy

Energy consumption within ALCS

Electricity consumption was 12940 kWh

Natural gas consumption was 5757 kWh

District heating consumption was 0 kWh

Water and Effluents

Water consumption

Total water usage was 92.8 m^3

Waste

Waste generated, waste diverted from disposal and waste directed to disposal

The available data from the landlord covers general waste and mixed recycling – general waste produced was 490kg and 448kg was recycled.

Appendices

Appendix 1

Non-material issues

Based on ALCS's business operations and materiality assessment and that ALCS's offices are located in services offices in central London, the following GRI disclosure topics have been excluded from the scope of our report as they are considered to be non-material:

- Infrastructure investments and services supported
- Significant indirect economic impacts
- Processes to remediate negative impacts
- Stakeholder engagement and management of concerns related to tax
- Materials and resource consumption
- Amount of recycled input materials used to manufacture ALCS's primary products and services
- Amount of reclaimed products and their packaging materials for each product category
- Energy consumption outside of ALCS (as per Scope 3 GHG accounting)
- Energy intensity
- Reduction of energy consumption
- Reductions in energy requirements of products and services
- Interactions with water as a shared resource
- Management of water discharge-related impacts
- Water withdrawal
- Water discharge
- Biodiversity
- GHG emissions intensity (GRI 305-4)
- Emissions of ozone-depleting substances (ODS) (GRI 305-6)
- Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions (GRI 305-7)
- Waste generation and significant waste-related impacts (GRI 306-1)
- Management of significant waste-related impacts (GRI 306-2)
- New suppliers that were screened using environmental criteria (GRI 308-1)
- Negative environmental impacts in the supply chain and actions taken (GRI 308-2)
- Prevention and mitigation of occupational health and safety impacts directly linked by business relationships (GRI 403-7)
- Occupational health services (GRI 403-3)
- Operations and suppliers at significant risk for incidents of child labour (GRI 408)
- Operations and suppliers at significant risk for incidents of forced or compulsory labour (GRI 409)
- Security personnel trained in human rights policies or procedures (GRI 410)
- Incidents of violations involving rights of indigenous peoples (GRI 411)
- Operations with local community engagement, impact assessments, and development programs (GRI 412-1)
- Operations with significant actual and potential negative impacts on local communities (GRI 413-2)
- Suppliers' social assessment (GRI 414)
- New suppliers that were screened using social criteria (GRI 414-1)
- Negative social impacts in the supply chain and actions taken (GRI414-2)
- Customer health and safety (GRI 416)
- Marketing and labelling (GRI 417)
- Collective bargaining agreements (GRI 2-30)
- Approach to tax (207-1)
- Country-by-country reporting (207-4)

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