

Sustainability Impact Report 2025

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About us

On 28 February 2025, Bromford Housing and Flagship merged to create Bromford Flagship, one of the largest housing associations in the UK.

Together, we now manage over 80,000 homes across central, south-west, and eastern England. Our combined scale and financial strength enable us to invest more in homes, services, and communities, while remaining true to our purpose: to provide safe, affordable housing and enable people to thrive.

As a profit-for-purpose organisation, we reinvest every surplus into building and improving homes and delivering services that matter. We manage many services in-house and are committed to innovation, sustainability, and delivering long-term social impact.



About Flagship and Bromford



Flagship is a housing provider with over 33,000 homes in the east of England. Our purpose is to provide safe, secure, and affordable homes while creating sustainable communities. As a profit-for-purpose organisation, we reinvest our surplus into building new homes, improving our existing ones, and delivering services that make a lasting impact. We manage our services in-house, including repairs and maintenance, and operate a successful heating and renewables company. We also oversee a homelessness charity, Hopestead, who provide additional support to people in need.

Bromford.

Bromford is a housing provider with over 47,000 homes across central and south-west England. Our purpose is to provide safe, secure, and affordable homes while supporting thriving, sustainable communities. As a profit-for-purpose organisation, we reinvest our surplus into building new homes, improving our existing ones, and delivering services that make a lasting impact. We manage many of our services in-house, including repairs and maintenance, and operate our own in-house construction division. We also offer specialist support services to help customers live independently and confidently.

A message from our Chief Operating Officer

This year's Environmental, Social and Governance (ESG) report marks a pivotal chapter in our sustainability journey. On 28 February 2025, Bromford Housing and Flagship formally merged to become Bromford Flagship, now one of the UK's largest housing associations with approximately 80,000 homes across the east, southwest, and central regions of England.

While this report reflects our final year as two separate organisations, it also marks the beginning of a united future anchored in greater capability, resilience, and social purpose. This dual perspective allows us to look back at best practices from each legacy organisation, while looking forward to accelerating ESG innovation, reducing risk, and building strength as one organisation.

We operate in a demanding environment shaped by economic pressures, rising costs, geopolitical tensions, and heightened expectations from regulators, customers, and investors. Climate risks are intensifying, alongside increasing demands around decarbonisation, ecological responsibility, customer satisfaction, and long-term resilience.

Housing associations like ours are being called on to deliver essential services while investing in climate resilience, social equity, and a transition to a low-carbon future. We are committed to leveraging partnerships and sustainable finance to unlock resources and deliver measurable impact, ensuring that progress benefits our most vulnerable

customers while strengthening communities and environmental outcomes.

Despite the pressures, both Bromford and Flagship embedded ESG into decision making. This report highlights progress in retrofit, climate adaptation, environmental management, customer engagement, and alignment with best practice reporting frameworks. Sustainability has become central to our financial and operational approach, with sustainability-linked loans tied to gender pay equity, customer outcomes, and carbon reduction. Strengthened data infrastructure is also enhancing assurance and transparency.

We are committed to delivering over 25,000 new homes by 2040. From the 2030s onward, half of all new homes will be for social rent – providing affordable, sustainable tenancies that offer financial security to customers.

To ensure new homes are fit for the future, we are raising environmental standards and assessing Modern Methods of Construction (MMC), supported by supplier due diligence.

Following Flagship's G2 regrade in 2023, all recommendations were addressed, and Bromford Flagship now holds a G1/V1 rating, demonstrating excellence in financial strength and governance.

In 2026, we will publish our first Bromford Flagship Sustainability Strategy, setting out plans for decarbonisation, nature recovery, climate resilience, and social value. As we continue to embed ESG principles into our culture and strategy, our focus remains clear: delivering lasting value for our people, our communities, and our planet.

David Armstrong
Chief Operating Officer



This report has been prepared in line with Version 2.0 of the Sustainability Reporting Standard for Social Housing, published in Autumn 2023 and managed by Sustainability for Housing (SfH). The Standard comprises 46 criteria across 12 themes, organised under the three pillars of Environmental, Social, and Governance. These include both Core and Enhanced reporting options; where applicable, we endeavour to address Enhanced criteria fully. An index listing the criteria reported under each theme, along with the corresponding United Nations Sustainable Development Goals (UN SDGs), is provided at the end of this document to support clarity and comparability.

Merger journey

Bromford and Flagship were a strong cultural fit across a broad east-west geography. Bromford owns and manages c.47,000 homes with a core focus on investing in homes and relationships so people can thrive. Flagship owns and managed c.33,000 homes with a strategic focus on providing homes for affordable rent and creating sustainable communities.

Our vision has created one of the largest housing associations in the UK owning and managing over 80,000 homes. Together Bromford Flagship unlocks £1.9bn additional investment capacity over and above the sum of the parts. As a stronger organisation, Bromford Flagship is able to better serve customers and increase investment in communities enabling people to thrive.

Our strategy is underpinned by a focus on community and developing new homes at scale whilst investing in the growth and development of both colleagues and customers. Our scale will enable us to explore opportunities as a regional leader with local and national government. We want to remain a purpose-led social business by utilising research, development and innovative thinking to explore proactive solutions within our place based strategic approach with a central focus on customer service delivery and customer voice.

Our top priority will always remain customer and colleague safety. New housing supply remains an important government priority and we know we have an important part to play in that. Our operational focus areas include housing maintenance, complaints redress and technology projects to improve our customer journey.

We want to get this right and we've implemented a robust transition plan to ensure that happens. The plan includes:

- ✓ establishing a new Bromford Flagship Board and executive committee to deliver coherent direction,
- ✓ developing a fully informed Bromford Flagship strategy to be launched in 2026, focusing on delivering existing strategies and building links to support integration,
- ✓ well-planned integration at the right time to protect services,
- ✓ integration of east and west functions with no immediate structural changes for most teams,
- ✓ continued investment in training, development and growth for colleagues and customers.

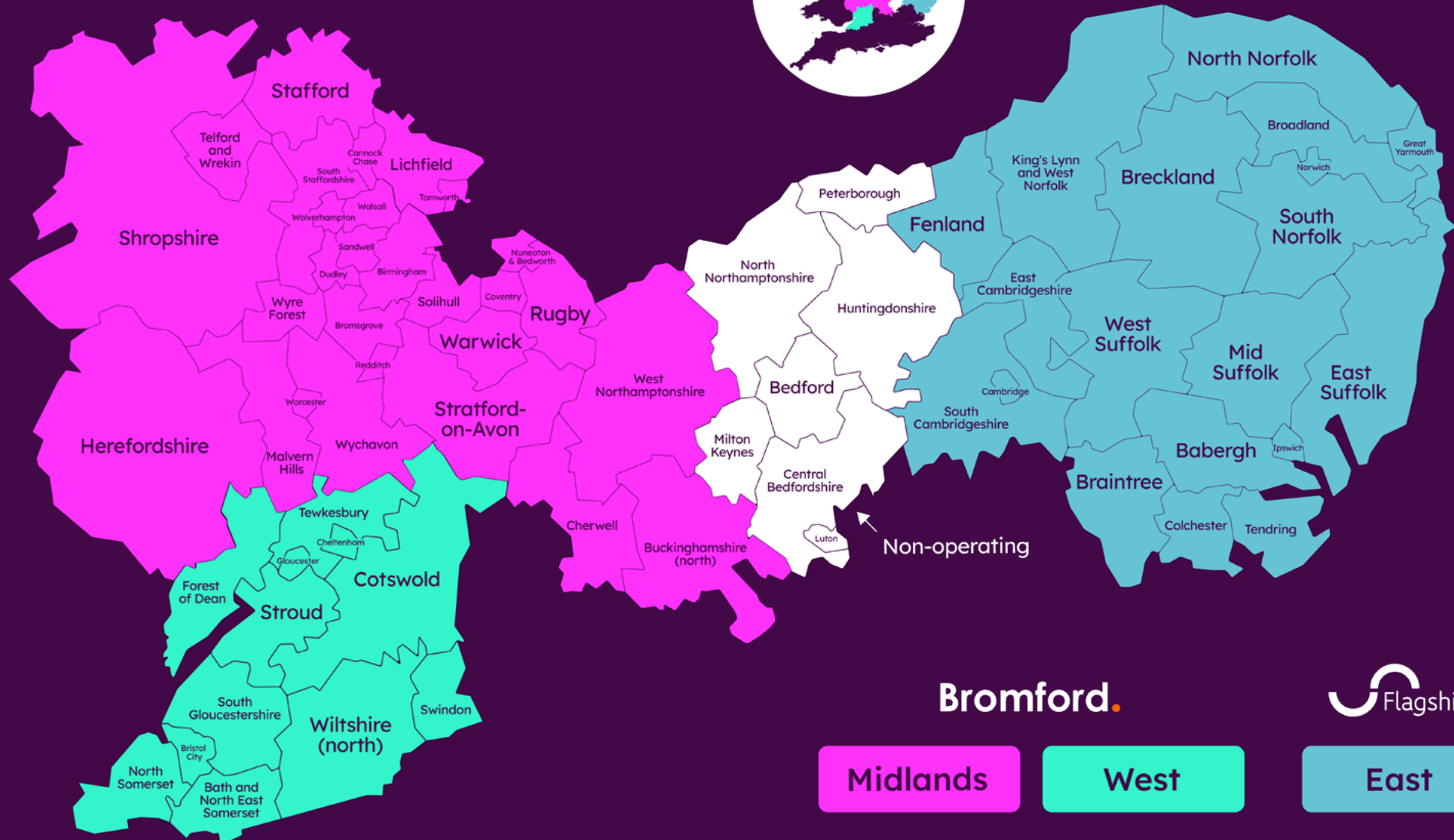
80,000
homes

£1.9bn
investment
unlocked

No.1
priority
health and
safety



Our operating area



Bromford.

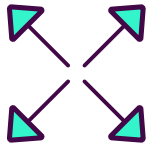


Midlands

West

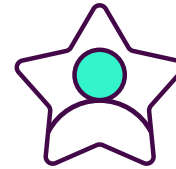
East

Our strategy in 2026 will have a strong focus on four principles and these four principles underpin our sustainability within our business:



Growth

To utilise additional capacity created through merger combination with a focus on building new homes with an ambition for c.50% of those to be for social rent.



Opportunity

Developing talent and creating opportunities for customers and colleagues including the development of a Bromford Flagship Academy as a centre for skills excellence across our geography.



Place

Developing a new Place Standard focused on local community enhancement. Whether that is through new homes or infrastructure, improvement of existing homes, community accessible green space, employment opportunities or regeneration of wider areas, it's important that these are tailored to local community need and we believe this standard is foundational to the future of our social housing model.



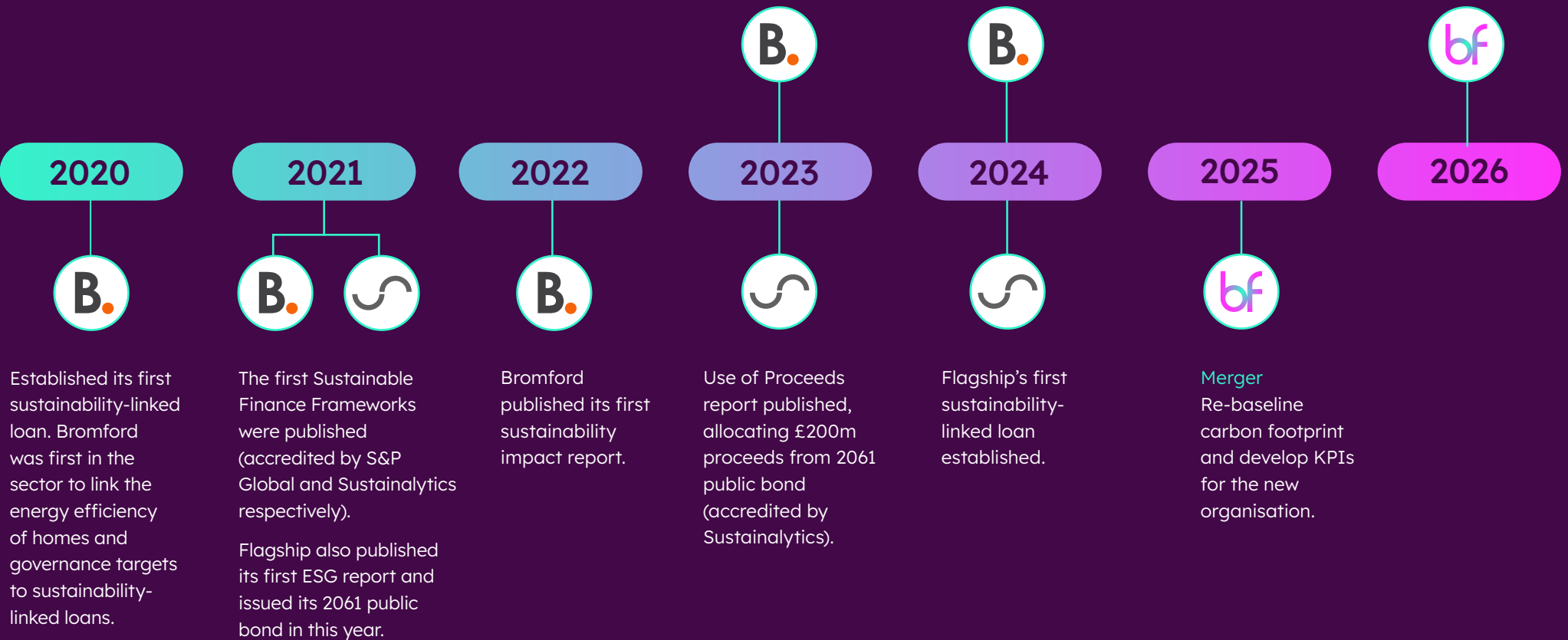
Innovation

Looking outside of the sector for inspiration and ideas we will innovate through research and development creating proactive solutions for our customers, colleagues and the wider sector.

Sustainability journey

Bromford Flagship's sustainability future will be built on the sector leading foundations created by Bromford and Flagship individually. We've committed to all future funding being linked to our sustainability objectives.

The timeline below demonstrates some of our key treasury sustainability milestones;



Sustainable Finance Framework



Paul Walsh
Chief Financial Officer



The role of sustainable finance

For our customers to feel the real impact of sustainability, it demands a deep, unified commitment that permeates everything we do, right down to the financial foundations that support us.

Our Sustainable Finance Framework is therefore an essential component of our corporate strategy. It commits us to raising all future funding under the sustainability banner, aligning our future financing to strategic commitments, underpinned throughout by ten United Nations Sustainable Development Goals (UN SDGs’).

It is also a springboard for partnering with lenders and investors who share this vision to deliver meaningful change.

Like many of our peers, we have adopted a use of proceeds Framework, which means the net proceeds from the issuance of green, social or sustainable funding will be exclusively used to finance or refinance green and social projects.

We have also gone further by sharing here and in our Sustainable Finance Framework our existing Sustainable Linked Loan KPIs that have been agreed bilaterally with funders. We have voluntarily aligned these, on a best endeavours basis, to the LMA Sustainability Linked Loan Principles (2025) but this has not been verified by a third party.

As a pioneer of sustainability-linked borrowing in the sector – including the first loan linked to the energy efficiency of homes – we’ve committed to all future funding being tied to our sustainable objectives. To put this into context, we currently have c.£3.5bn of finance, with plans to raise c.£5bn of new financing by 2040.

£3.5bn
current funding

£5bn
to raise by 2040



Our framework demonstrates our ESG credentials and outlines our sustainability investment priorities for the benefit of investors.

We have aligned the framework with internationally recognised principles and guidance issued by the International Capital Market Association (ICMA) and the Loan Markets Association (LMA).

These industry bodies provide a set of voluntary guidelines and our Framework aligns with the following principles:

1. Green Bond Principles 2021 (GBP) (with June 2022 Appendix I);
2. Social Bond Principles 2023 (SBP);
3. Sustainable Bond Guidelines 2021 (SBG);
4. Green Loan Principles 2025 (GLP); and
5. Social Loan Principles 2025 (SLP).

The framework has four components and will be externally reviewed to promote its integrity and transparency:

1. Use of proceeds.
2. Process for project evaluation and selection.
3. Management of proceeds.
4. Reporting.

By aligning with both ICMA and LMA, we deepen our commitment and contribution to the UN Sustainable Development Goals (SDGs). Combined with our ESG reporting and wider strategic approach, our activities work to directly support 10 SDGs. These are:



UN sustainable development goals (SDG)	ICMA/LMA	SRS
1: No Poverty	✓	✓
4: Quality Education	✓	
7: Affordable and Clean Energy	✓	
8: Decent Work and Economic Growth	✓	✓
10: Reduced Inequalities	✓	✓
11: Sustainable Cities and Communities	✓	✓
12: Responsible Consumption and Production	✓	
13: Climate Action	✓	✓
15: Life on Land		✓
16: Peace, Justice and Strong Institutions		✓

Sustainable Finance Strategy and KPIs

Bromford Flagship began linking finance to sustainability in 2020, when Bromford pioneered the housing sector's first loans tied to energy efficiency and governance. In 2021, Flagship issued its debut £250 million public bond under its sustainable finance framework, committing to use the proceeds to build new affordable homes and fund energy efficiency projects.

Since then, both organisations have expanded their focus across all three ESG pillars. As a combined group, Bromford Flagship now has sustainability-linked loans (SLLs) with six lenders and plans to convert facilities with two more by year-end. All future financing will be tied to our sustainability objectives, embedding ESG across our operating model and aligning finance with outcomes that matter to our customers and communities.

Our Sustainable Finance Framework outlines the intended use of proceeds from capital market issuances, aligned to principles from the International Capital Markets Association (ICMA) and the Loan Markets Association (LMA). It is supported by a Second Party Opinion from DNV Business Assurance Services UK Limited.

The framework also sets out our SLL key performance indicators (KPIs) and sustainability performance targets (SPTs), with voluntary alignment to the 2025 LMA Sustainability-Linked Loan Principles. While not externally verified, this reinforces transparency in our ESG-linked funding.

The KPIs reflect our strategic ambition to embed sustainability throughout the organisation. Each is tied to measurable SPTs within loan facilities and aligned to the UN SDGs. Performance is overseen by the Sustainability Group and Treasury Committee, with progress reviewed monthly. Following the merger in February 2025, all KPIs are under review with banking partners, due for completion by the end of 2025.

In the year ahead, Bromford Flagship will

- ✓ conclude the review of SLL KPIs with all banking partners, ensuring alignment with our ESG priorities,
- ✓ streamline the number of KPIs, focusing on a smaller set of core measures that maximise strategic impact,
- ✓ continue to embed sustainability-linked criteria in all future bank financing arrangements,
- ✓ strengthen the link between SLL KPIs and our sustainability objectives, ensuring measurable, high-impact outcomes,
- ✓ reinforce reporting and assurance processes to enable reinvestment of margin reductions into improving customer experience.



Performance against KPI targets for the year to 31 March 2025 is set out in the table below. Performance against the KPI targets was measured for each of the Bromford and Flagship predecessor groups on a standalone basis. Some of the KPIs apply to only one of the two predecessor groups but we have reported the results for both, where these are available.

KPI	SPT	Methodology	Bromford	Flagship
Gender pay gap	Continuously improve gender pay gap from its existing median group level year-on-year OR be ranked within the top half of the peer group's performance.	The difference between the median hourly rate of pay of male colleagues and that of female colleagues. Calculations for the pay gap metrics are based on a single pay period around the snapshot date of 5 April in each year.	5.0% ▲ 3.8% (2024)	-7.8% ▼ 8.8% (2024)
Colleague sick days	Reduce colleague sick days.	The mean number of days of sickness leave taken per colleague in each financial year (expressed as % of total working days).	7.8% ▼ 8.7%	8.2% ▲ 6.6%
Customers coached into employment or training	Coach customers into employment or training.	The number of unemployed customers who received coaching from Bromford and as a result entered employed work or substantive, career-enhancing training, measured on a cumulative basis from 1 April 2023.	47 ▲ 25	Not measured
Customer advocacy ¹	Improve our customer advocacy score.	The percentage of customers who respond positively (a response of 7, 8, 9 or 10 out of 10) to the survey question 'would you recommend Bromford to a friend?', aggregated across all nine transactional service areas.	90% ▼ 91%	84% ▲ 80%

¹ These are internal measures of customer satisfaction, and the reporting methodologies are different for Bromford and Flagship.

² The KPI is currently measured against Bromford's performance only and was reported to the relevant lender on this basis, however we have chosen to report externally on a combined basis given the information is available for the group as a whole.

KPI	SPT	Methodology	Bromford	Flagship
Average live repairs	Reduce the average number of outstanding repair jobs.	The total average number of outstanding repair jobs calculated as the average of month end positions to 31 March in each financial year.	17,031 ² ▼ 19,160	
Number of new homes built for social rent/affordable rent	Build more homes for social rent/affordable rent.	The number of homes built for social rent/ affordable rent that achieved practical completion during the financial year.	1,225 ³ ▼ 1,324	
Scope 1, 2 and 3 carbon emissions – intensity measure	Reduce the carbon intensity of our operating model.	Total carbon emissions (scope 1, 2 and 3) in kilograms, measured across the 12-month period to the reporting date, divided by the total floorspace of our homes in metres squared, measured at the reporting date. (CO ₂ e/m ²)	29.72kgCO ₂ e/m ² ▼ 30.42kgCO ₂ e/m ²	Not measured ⁴
Percentage of properties at EPC C	Increase in the percentage of properties with an Energy Performance Certificate (EPC) rating of C or above.	Total proportion of properties with an EPC C certificate or better as a percentage of total affordable rented population.	90% ▲ 89%	68% ▲ 62%
SHIFT score	Maintain or improve its annual Sustainable Homes Index for Tomorrow (SHIFT) score and increasing the numerical score each year.	SHIFT assesses environmental impact across 21 criteria including CO2 emissions, water use, waste management and biodiversity. And more importantly assesses the landlord response to impact.	Not measured	55.62% ▲ 53.48%

³ Reported for the year to 31 March 2025 on a combined basis, made up of 519 social rent homes and 706 affordable rent homes. There are individual KPIs in the Bromford and Flagship parts of the group; Bromford's includes social rent homes only and Flagship's includes social and affordable homes. Both are cumulative measures starting from a particular point in time.

⁴ This is not measured as it is not currently calculated on a consistent basis with Bromford.

Environmental



T1 Climate change

Prevents and mitigates the risk of climate change.

T2 Ecology

Promotes ecological sustainability.

T3 Resource management

Sustainable management of natural resources.



T1: Climate Change

Prevents and mitigates the risk of climate change

C1. Distribution of EPC ratings of existing homes (those completed before the last financial year)

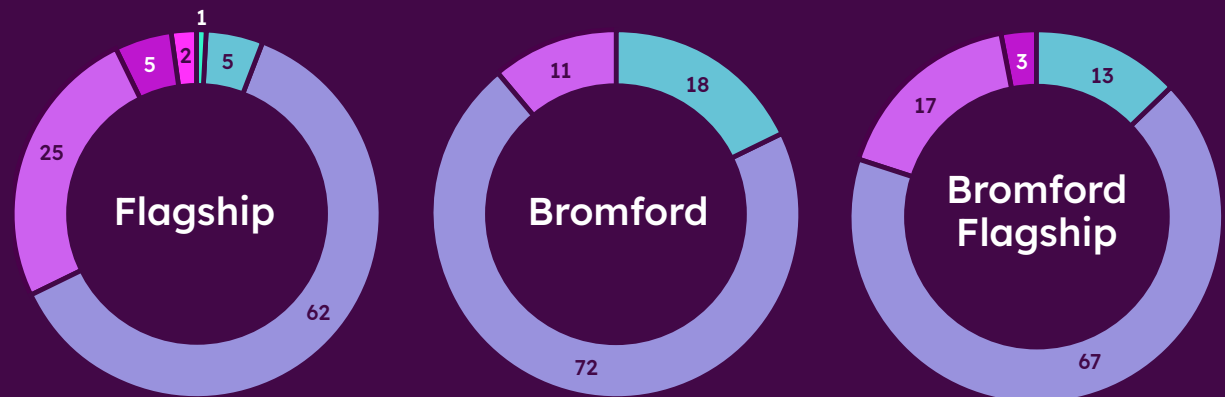
Across the combined Bromford Flagship Group, 80% of our properties, are already performing at or above the government's 2030 minimum standard of Energy Performance Certificate (EPC) Band C¹, which equates to a Standard Assessment Procedure (SAP) score of 69 or above.

Looking ahead

The remaining 20% of homes that currently fall below EPC C (Bands D to G), where possible, will be prioritised for retrofit assessments and thermal upgrades. This work is supported by targeted funding and investment planning to improve energy performance, reduce carbon emissions, and deliver warmer, more affordable homes for our customers.

¹ The Energy Performance Certificate (EPC) provides an overall rating of a home's energy efficiency (A-G), while the Standard Assessment Procedure (SAP) is the UK Government's methodology for calculating that rating. In this report, EPC bands are referenced alongside the corresponding SAP score ranges for clarity.

Percentage (%) of existing homes by EPC Financial Year 24-25



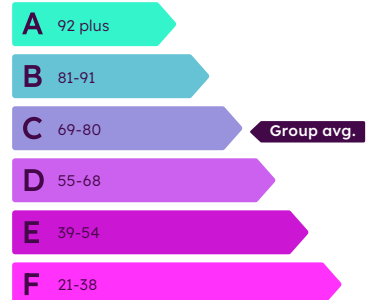
EPC Rating:



Based on the latest EPC data, the average EPC/SAP rating across the Group falls within EPC Band C/SAP 69-80.

Avg. SAP rating:

Bromford	SAP 75
Flagship	SAP 70
Bromford Flagship	SAP 73



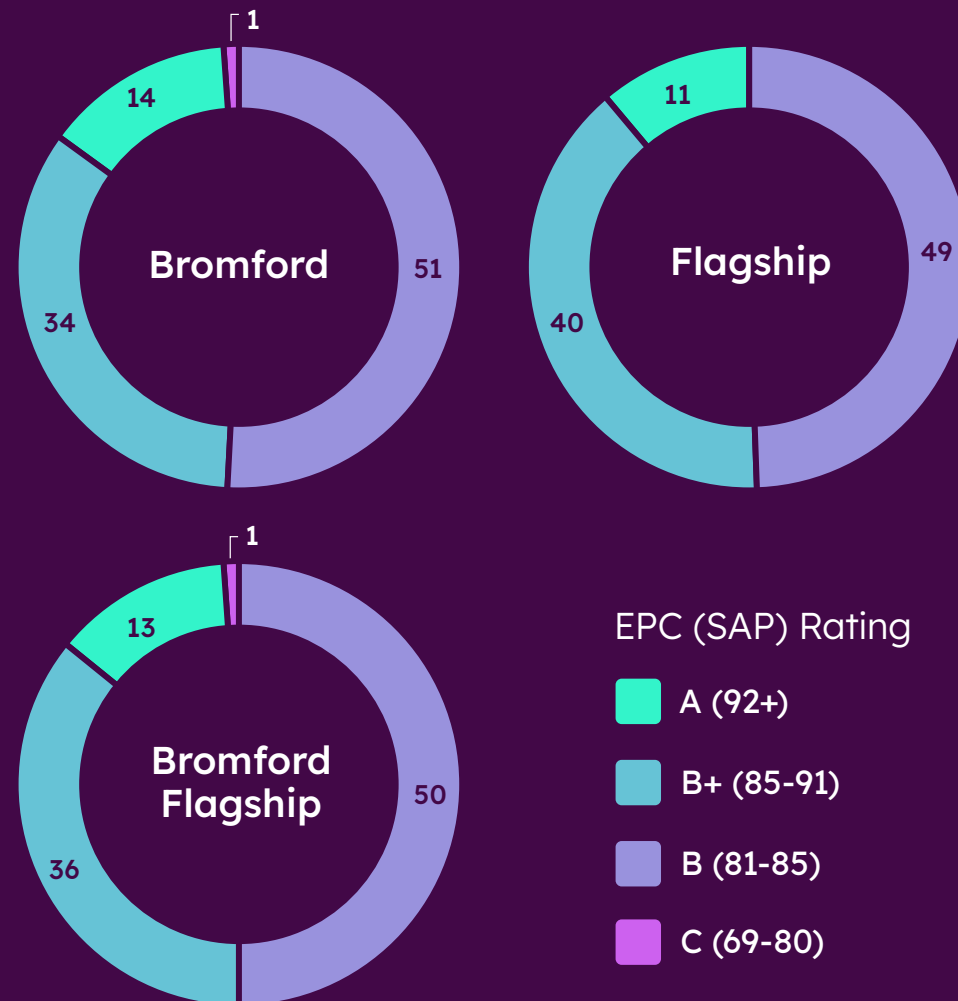
C2. Distribution of EPC rating of new homes (those completed in the last financial year)

In 2024/25, nearly half of all new homes delivered across Bromford Flagship achieved EPC A or high B ratings, reflecting strong progress in delivering energy-efficient housing. This performance provides a solid baseline as we continue to integrate smarter technologies, lower-carbon heating systems, EV charging infrastructure, and modern methods of construction into future developments.

Looking ahead

Our focus now is on exceeding regulatory requirements, preparing for the Future Homes Standard, and embedding climate resilience and low-carbon design principles into all newbuild programmes.

Percentage (%) of new homes delivered by EPC/SAP Financial Year 24-25



C3. Does the housing provider have a Net Zero target and strategy?

At Bromford Flagship, we recognise the importance of transitioning to a low-carbon economy in line with climate science and the UK's legally binding 2050 target. The merger of Bromford and Flagship presents a timely opportunity to consolidate our efforts, align best practices and review our respective roadmaps to Net Zero, with the view to publishing our first group wide decarbonisation and transition plan in 2026.

Both organisations are making significant strides to decarbonise our homes and operations. We have secured Warm Homes: Social Housing Fund (formerly Social Housing Decarbonisation Fund) support to improve the energy performance of existing homes. Bromford has linked emissions reductions to sustainability-linked loans and embedded decarbonisation into its long-term business plan. Flagship has continued to progress retrofit delivery and has invested in improved asset management software to support more accurate, asset-level energy performance tracking. We have also strengthened our carbon tracking and stakeholder engagement, invested in additional green skills development, and are actively progressing plans to electrify both staff and maintenance fleets.

Looking ahead

As part of our first joint Sustainability Strategy, we are developing a comprehensive Decarbonisation and Transition Plan, setting out a clear, measurable pathway towards Net Zero. This will take into account emerging national and sectoral milestones, such as the Future Homes Standard, SAP 10.2, and Decent Homes Standard 2, with relevance determined in collaboration with our stakeholders.

We will also support the wider transition to clean energy, including the gradual phasing out of fossil fuel heating systems, the ongoing electrification of our fleet and the decarbonisation of our workplaces. We are already investing in energy efficiency improvements such as LED lighting, smarter

heating controls, solar PV and battery storage and exploring other alternative low-carbon solutions to reduce our dependency on the grid.

A priority for the year ahead is to establish a unified carbon baseline for the new combined group. This will be underpinned by consistent methodologies, clearly defined reporting boundaries, and robust data systems. A harmonised baseline will enable more accurate and comparable tracking across our business and inform long-term planning, investment and reporting.



Our decarbonisation priorities

To support a transparent and evidence-based transition, we will focus on the following priorities over the coming year:

- ✓ finalise a unified carbon baseline for Bromford Flagship, enabling consistent emissions tracking across the combined group
- ✓ review and align Scope 3 coverage, and assess the feasibility of including other relevant categories such as:
 - **Category 1:** Purchased goods and services
 - **Category 2:** Capital goods
 - **Category 5:** Waste generated in operations
 - **Category 7:** Employee commuting
 - **Category 11:** Use of sold homes
- ✓ develop our first Sustainability Strategy, including a Decarbonisation and Transition Plan, detailing emissions reduction actions across homes, workplaces, and fleet (e.g. EV transition, charging infrastructure, and route optimisation),
- ✓ accelerate retrofit delivery and integrate carbon performance metrics into asset investment planning and stock modelling,
- ✓ continue monitoring communal heating system performance, optimising schemes, installing heat metering equipment to reduce emissions, and exploring viable low-carbon upgrades,
- ✓ strengthen internal data and reporting systems to ensure robust, auditable carbon data for decision-making and ESG disclosures,
- ✓ explore setting science-aligned targets, including both absolute and intensity-based metrics, referencing UK and international decarbonisation pathways.

We have plans to raise **over £4bn** of finance by 2040. All future financing will be tied to our sustainability objectives, underpinned by our Sustainable Finance Framework. Proceeds will generally be used to fund green and social projects aligned to our strategic priorities, which include the development of new affordable homes and the retrofit and improvement of existing homes. Oversight is provided by our cross-directorate Sustainability Group, which is chaired by the Chief Operating Officer and the Treasury Committee, which is chaired by a non-executive director. This ensures strong governance, alignment with business planning and risk management

Together, these steps will ensure we are well-positioned to deliver warmer, lower-carbon homes and operate more sustainably across our business, while playing our part in building a resilient, net zero future.



C4. What retrofit activities has the housing provider undertaken in the last 12 months in relation to its housing stock? How do these activities align with, and contribute towards, performance against the housing provider's Net Zero strategy and target?

Bromford Flagship has delivered extensive retrofit works across many homes in the last financial year, improving thermal efficiency, reducing carbon emissions, and helping customers lower their energy bills. Collectively, over **15,000 energy efficiency measures** were installed, representing more than **£51 million of investment**. Works focused on a fabric-first approach combined with low-carbon technologies, supporting our shared goal to bring all homes up to at least minimum EPC C/SAP 69 by 2030 and aligning with the government's target for Net Zero by 2050.

Bromford.

In 2024/25, Bromford made significant progress in scaling up its retrofit activities as part of its broader commitment to achieve Net Zero by 2050. A key improvement was the creation of a dedicated retrofit workstream, appointing two Customer Liaison Officers to guide customers through the retrofit journey. In addition, retrofit training was delivered across technical and non-technical teams to build capacity and maintain high standards.

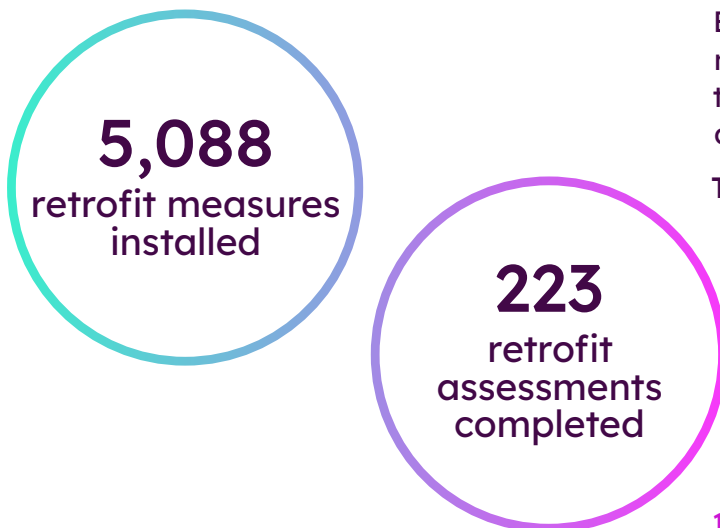
Bromford delivered 5,088 energy efficiency measures across its housing stock during the year with a total investment of approximately £21.82 million.

This included:

- 2,088 gas heating upgrades
- 1,339 new doors and 967 new windows
- 361 cavity wall insulation and 238 external wall insulation installations
- 51 solar PV systems
- 27 high-retention storage heaters
- 17 air source heat pumps

Bromford also completed 223 retrofit assessments to support its SHDF Wave 2.1 programme and prepare for future pipeline delivery. These measures were partly grant-funded via SHDF and ECO4. Bromford was also successful in securing just under £6.9m funding through the Warm Homes: Social Housing Fund, with plans to upgrade an additional 600 homes during the project.

All retrofit activity is aligned with Bromford's goal of moving as many homes to EPC C as possible by 2028 and its long-term Net Zero targets. Measures have improved EPC ratings, reduced carbon emissions, and improved comfort and affordability for customers — particularly those facing fuel poverty. A fabric-first approach combined with low-carbon technologies ensures that decarbonisation is both effective and customer-centred.





In the past year, Flagship finalised and adopted its first Retrofit Plan with its revised Net Zero (NZ) Roadmap, establishing a clear, coordinated pathway to improve the energy performance of its housing stock. The plan sets out how the organisation will achieve a minimum EPC C by 2030 and NZ by 2050, identifying homes below EPC C, modelling a typical SAP uplift of 10 points, and estimating a total investment of £104 million, an average of £10,221 per property. To support future delivery, during this year Flagship conducted 856 retrofit assessments, intentionally exceeding the number of properties in scope to create a contingency pipeline of pre-assessed homes. This allows the delivery team to substitute properties seamlessly if any homes are dropped from the planned programme, ensuring continued progress without delay.

In FY24/25, 383 homes were improved to a minimum EPC C standard, with 26 homes now impressively performing at EPC A and 138 at EPC B, marking the first tangible progress under the new retrofit roadmap.

Alongside this, Flagship delivered 10,237 energy efficiency measures, equating to an investment of £29.95 million.

This included:

- 4,273 cavity wall insulation installations,
- 2,384 new doors and 1,669 new windows,
- 1,216 gas heating upgrades
- 235 air source heat pumps
- 249 solar PV systems
- 77 high-retention storage heaters
- 37 external wall insulation measures

Flagship applied for £20.5 million in SHDF Wave 3 funding to deliver over 5,600 energy efficiency measures across 3,283 homes. Due to high competition, only 69% of the bid was awarded, which means the Wave 3 project will now deliver 2,505 measures across 2,508 homes. All participating homes are expected to reach a minimum of EPC C through the programme. Approximately 2,200 remaining homes are currently considered technically or financially challenging to upgrade and are being reviewed for potential disposal, long-term planning, or innovative retrofit solutions.



Case Study Retrofit works in Elkstone

Supported by the Government's Social Housing Decarbonisation Fund (SHDF) Wave 2.1, Bromford delivered vital energy efficiency upgrades to six homes - comprising four bungalows and two semi-detached houses in Hill View, Elkstone.

These properties had seen limited previous investment and were equipped with either relatively modern electric heating systems or older solid fuel back boilers. All suffered from poor thermal performance due to inadequate fabric measures, including missing or failed cavity wall insulation, early-generation double glazing, and insufficient loft insulation. EPC ratings ranged from low D to E, with surveys revealing high energy usage, significant heat loss, and evidence of damp and mould.

Works were delivered in line with PAS 2035 standards by TrustMark-accredited installers.



Works delivered

- ✓ Full cavity wall insulation replacement and loft insulation top-ups.
- ✓ Installation of modern, thermally efficient windows and doors.
- ✓ Installation of air source heat pumps.
- ✓ Roof covering replacements to match the lifespan of renewable systems.
- ✓ Installation of solar PV systems.
- ✓ Improved ventilation strategies and airtightness measures to address condensation and mould.



Outcomes

- ✓ Average SAP score uplift of 27 points per home.
- ✓ The most improved home increased from EPC E/SAP 53 to B/SAP 89.
- ✓ Estimated annual CO₂ emissions reduced by 13 tonnes (from 28.9t to 15.9t), equivalent to the carbon absorbed by 600 trees annually.
- ✓ Households can now generate and export surplus solar energy, further reducing energy bills.



CO₂ emissions reduced by

13 tonnes

Case Study Retrofit works in Sutton

Supported by the Government's SHDF Wave 2.1, Flagship delivered essential energy efficiency upgrades to four homes in Sutton, Suffolk. These properties, all of solid wall construction, had an average EPC rating of E. Customers reported issues such as cold, draughty conditions and persistent damp and mould.

Working in line with PAS 2035 standards and using TrustMark accredited installers, Flagship partnered with local specialists to deliver a whole house retrofit approach.



CO₂ emissions
reduced by
**29
tonnes**



Works delivered

- ✓ Installation of external wall insulation, improved cavity wall and loft insulation
- ✓ Replacement of external doors with modern, thermally efficient alternatives.
- ✓ Installation of air source heat pumps to replace old oil boilers or storage heaters.
- ✓ Mechanical ventilation upgrades to improve indoor air quality and reduce condensation - improved ventilation including mechanical extract fans to remove stale/moist air, internal door undercuts to improve air flow and trickle ventilation for fresh air intake.
- ✓ Installation of solar PV systems to generate on-site renewable electricity.



Outcomes

- ✓ All homes improved to an average EPC rating of B.
- ✓ Estimated annual CO₂ savings of 29.2 tonnes, equivalent to the emissions absorbed by over 1,300 trees each year.
- ✓ Significant improvements to indoor comfort, tackling cold spots, draughts, and mould.
- ✓ Customers now benefit from lower energy bills and the ability to export surplus electricity back to the grid.
- ✓ Contributed to Flagship's goal of reaching EPC C by 2030 and supported the Group's Net Zero target for 2050.

Investment in energy efficiency measures by installation - Financial Year 2024-25

Measure	Bromford		Flagship	
	Installs	Investment (£m)	Installs	Investment (£m)
Air source heat pumps	17	£0.2	235	£4.1
Solar PV	51	£0.9	249	£1.6
HR storage heaters	27	£0.1	77	£0.5
Gas heating upgrades	2088	£7.3	1216	£5.5
Cavity wall insulation	361	£4.5	4273	£3.5
External wall insulation	238	£2.8	37	£1.2
Windows	967	£3.9	1669	£9.6
Doors	1339	£2.1	2384	£3.1
Total	5088	£21.8	10237	£30.0

Looking ahead

Bromford Flagship will:

- ✓ Develop a Group-wide decarbonisation plan, setting out a clear pathway to meet the 2050 government target while ensuring investment is targeted where it delivers the greatest benefit.
- ✓ Continue scaling retrofit delivery, focusing on the hardest-to-treat and lowest-performing homes.
- ✓ Expand customer engagement and support, ensuring customers are informed, prepared, and supported through the retrofit process.
- ✓ Continue to maximise external funding opportunities, building on successes in securing SHDF and other grants.
- ✓ Increase our use of data and asset intelligence to prioritise works effectively and track progress against our long-term sustainability objectives.

C5. GHG (greenhouse gas) emissions

Bromford and Flagship have been actively tracking their Scope 1, 2 and 3 greenhouse gas emissions to better understand and manage their environmental impact. In FY25, our combined carbon footprint across more than 69,000 homes was 164,337 tCO₂e¹, representing a 14% reduction from FY24 (191,962 tCO₂e). This reflects a combination of actual reductions and changes in methodology and data quality.

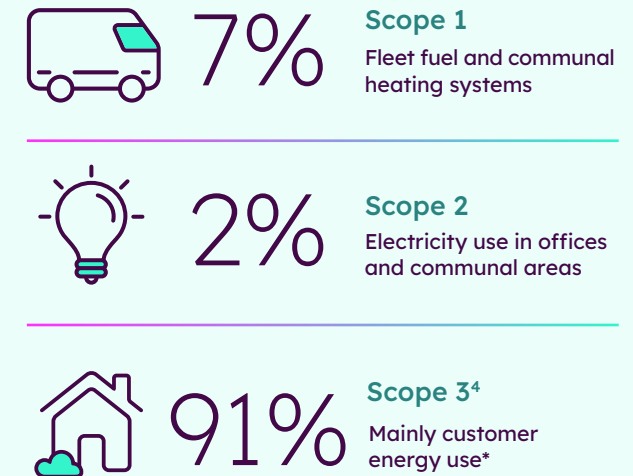
While both Bromford and Flagship report against the same Scope 3 categories (fuel and energy-related activities, business travel, and upstream leased assets), their underlying methodologies differ². Therefore, while the emissions profiles are similarly shaped, the figures are not directly comparable and combined totals should be interpreted with caution. We are currently working to align reporting methodologies and boundaries to establish a consistent, Group-wide carbon baseline in FY26.

Flagship's reported emissions fell by 27%³ in 2024/25, from 101,455 tCO₂e to 74,052 tCO₂e. This reduction reflects a combination of actual reductions and changes in methodology and data quality. Contributing factors include:

- ✓ emissions reductions achieved through our retrofit programme, which continues to target the least energy-efficient homes to improve thermal performance and install low-carbon technologies such as insulation, air source heat pumps and solar panels
- ✓ changed from using the SHIFT methodology to Dre-am Energy modelling, enabling more granular, asset-level energy performance estimates
- ✓ enhanced stock condition and energy surveys, improving the accuracy of modelled emissions
- ✓ in FY 25, Gasway accounts for approximately 17.8% of Flagship's combined Scope 1 and 2 emissions, and 1.72% of Flagship's total reported emissions.

Emissions profile

For the combined group, our emissions profile remains heavily weighted towards Scope 3, which accounts for 91% of total emissions, predominantly from modelled customer energy use in our existing homes:



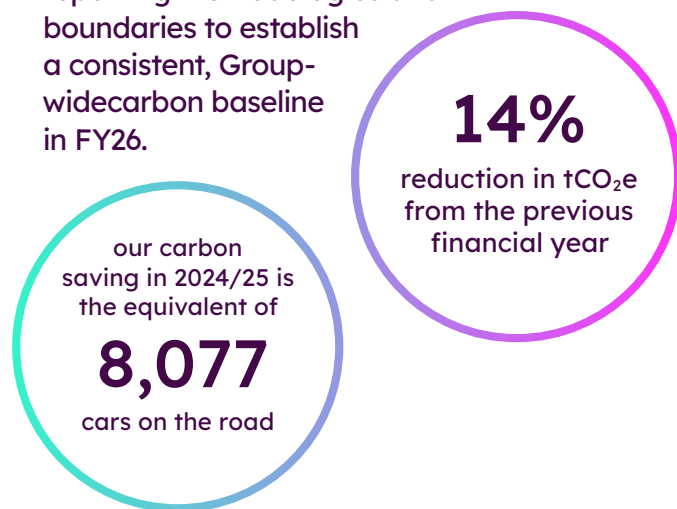
* based on modelled, not metered data

¹ tCO₂e: Tonnes of carbon dioxide equivalent. This unit expresses the impact of all greenhouse gases (e.g. CO₂, CH₄, N₂O) in terms of the amount of CO₂ that would have the same global warming potential, allowing different gases to be reported in a single, standardised metric.

² Bromford's is calculated using the SHIFT methodology and Dre-am Energy modelling is now used for Flagship's

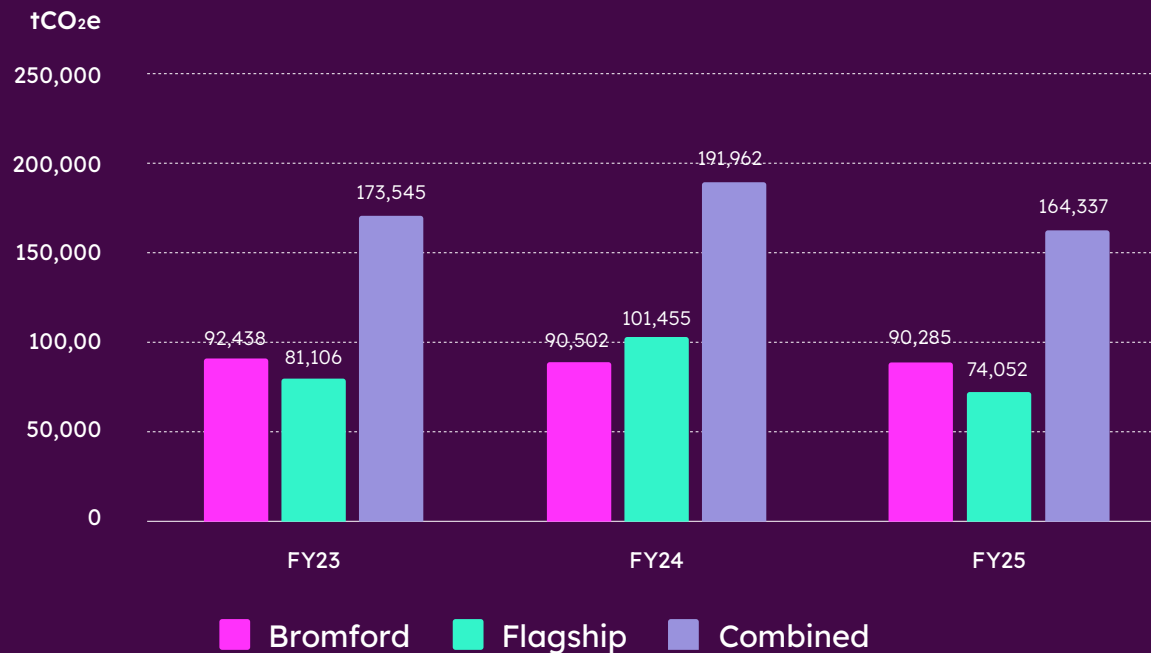
³ The proportion of this reduction directly attributable to retrofit activities is under review and not currently disaggregated. Flagship figures include the Gasway subsidiary emissions for the sake of this report giving an overall picture of group wide emissions.

⁴ Scope 3 emissions are based on modelled tenant energy use. Flagship uses Dre-am Energy software, while Bromford uses the SHIFT methodology. These approaches differ and are not directly comparable. Other Scope 3 categories, such as capital goods and waste, are not yet included but will be reviewed in FY26.



Tonnes of CO₂e (tCO₂e) by organisation

Financial years 23-25



Looking ahead

At Bromford Flagship, we recognise the importance of transitioning to a low carbon economy, in line with climate science and the UK's legally binding 2050 target. Over the coming year and as part of our new Sustainability Strategy, we will develop a comprehensive Decarbonisation and Transition Plan for the merged group.

A key priority will be to establish a unified carbon baseline using consistent methodologies and clearly defined reporting boundaries, enabling more accurate and comparable emissions tracking across the wider Group. This will also support long-term planning and prioritisation of carbon reduction actions.

Our SHIFT Environmental Assessment

Financial year 24/25



C6. How has the housing provider mapped and assessed the climate risks to its homes and supply chain, such as increased flood, drought and overheating risks?

Climate resilience will be key pillar of the new Bromford Flagship Sustainability Strategy. We are embedding a consistent, risk-informed approach across the organisation, addressing both physical risks (such as flooding, drought, and overheating) and transition risks (including regulation, decarbonisation policy, and market expectations). This work is already encouraging cross-team conversations on resilience, investment priorities, and community engagement in higher-risk areas.

In 2023, Bromford commissioned a desktop study to assess overheating risk across its housing stock, overlaying key property data with multiple climate risk factors. The findings highlighted certain homes that may be more vulnerable to higher temperatures, often where other performance challenges already exist. These homes are being prioritised as part of wider asset reviews, supported by customer surveys on thermal comfort and targeted follow-up for households with known vulnerabilities.

In the same year, Flagship commissioned a strategic study, Climate Change Resilience Solutions: Portfolio Climate Analysis. This study modelled long-term exposure to a range of physical climate hazards under IPCC-aligned scenarios. The findings provided a parish-level view of future climate risks across the portfolio, forming a valuable evidence base for future planning. The study is now guiding the development of a Climate Change Risk Register and helping to identify where more detailed, scheme-level analysis may be needed to target adaptation measures most effectively. Importantly, while parish-level modelling offered a useful high-level picture, certain hazards, particularly flooding, are highly localised. Postcode or scheme-level analysis, more common in housing risk modelling, could therefore improve precision and better inform adaptation measures.

By building this evidence base, Bromford Flagship is taking the first important steps towards a more resilient portfolio. Our priority now is to translate these insights into action, integrating resilience into investment decisions and asset planning, while engaging with customers and supply chain partners to strengthen adaptation in higher-risk areas.



The table below summarises the key hazards identified, along with projected timelines, risk rankings, and indicative adaptation measures.

Key:  Low risk priority  Moderate risk priority  High risk priority

Peril and timeline	Risk priority rating	Adaptation measures
Flooding Small increase projected through to 2100 Precipitation Very High hazard by 2100	High	<ul style="list-style-type: none"> • Maintain drainage systems and culverts to reduce flood risk. • Improve data collection, mapping, and analysis. • Implement nature-based solutions (SuDS, permeable pavements etc.). • Incorporate flood-resilient building design and materials. • Ensure compliance with planning regulations and flood risk assessments for new developments. • Provide customers with information on flood preparedness. • Ensure staff are adequately trained. • Develop strategic response plans.
Windstorm Peaking mid-century (2041–2060), then reducing by 2100	High	<ul style="list-style-type: none"> • Maintain buildings to withstand high winds and storms. • Invest in resilient roofing and structural design. • Develop strategic response plans and establish early warning systems. • Educate staff and customers on storm preparedness and response protocols.
Drought Very High hazard by 2100	Moderate	<ul style="list-style-type: none"> • Implement water-saving technologies, such as low-flow fixtures. • Explore alternative water sources, such as rainwater harvesting. • Collaborate with local water authorities for efficient water management.
Heat and other perils Currently assessed as low hazard	Low	<ul style="list-style-type: none"> • Increase biodiversity/nature-based solutions in communities to contribute to local cooling. • Build well-ventilated dwellings that keep cool in summer but warm in winter. • Incorporate passive design strategies, such as shading and reflective surfaces (MMC). • Develop heat action plans for extreme weather events.

We assess these risks as part of our risk management procedures and stress test our business plan to ensure we maintain financial viability to respond to significant stress events.

Looking ahead

Bromford Flagship recognises that building resilience to climate change will require deeper analysis and long-term planning. Our next steps include:

- ✓ exploring options to extend climate risk modelling across all homes and offices under multiple UKCP18 and IPCC-based scenarios, broadening the scope to include both physical and transition risks, as well as opportunities,
- ✓ developing a Group-wide Climate Risk Framework, drawing on Flagship's initial Climate Change Risk Register,
- ✓ integrating climate risk data into business planning, investment decisions, and retrofit programmes,
- ✓ designing the foundations of a Group-wide adaptation plan informed by scenario modelling and property-level vulnerability assessments,
- ✓ strengthening emergency preparedness and business continuity planning by embedding climate risk insights,
- ✓ continuing to engage with customers and communities to understand localised risks and provide responsive support.

This approach will be underpinned by compliance with Building Regulations, including Parts F, H, L, and O, and alignment with the forthcoming Future Homes Standard. By combining scenario-based modelling, targeted risk assessments, and regulatory compliance, we can lay the groundwork and encourage organisation-wide conversations, for a robust, data-informed approach to managing both physical and transition climate risks.



T2: Ecology

Promotes ecological sustainability

C7. Does the housing provider have a strategy to enhance green spaces and promote biodiversity on or near homes?

As part of our commitment to creating sustainable, resilient, and thriving communities, Bromford Flagship is actively enhancing and managing green spaces across our neighbourhoods. Our shared ambition is to deliver consistent, nature-positive outcomes across the Group through the development of our first Bromford Flagship Nature Recovery Plan, which will form a key pillar of our sustainability strategy. This work will go beyond regulatory compliance, aiming to maximise the environmental, social, and climate resilience benefits of nature-based solutions.

Progress to date

- ✓ **Nature Recovery Ambition** – Both legacy organisations have recognised the need for a more integrated and ambitious approach to green space and biodiversity management. We are exploring what would be required to exceed the mandatory 10% Biodiversity Net Gain (BNG) target for new developments.
- ✓ **Alignment with Emerging Frameworks** – We are considering alignment with the Taskforce on Nature-related Financial Disclosures (TNFD) and assessing how national and global ambitions such as the UK's 30 by 30 target could inform our approach.
- ✓ **Cross-Team Collaboration** – By bringing together the teams responsible for green space planning and management, we can embed planting and landscaping strategies that are ecologically appropriate, maintainable, and aligned with long-term recovery goals.
- ✓ **Place-Based Engagement** – We are engaging customers in the design, use, and stewardship of shared outdoor spaces through local influence networks, co-designed projects, and neighbourhood feedback. This ensures green spaces reflect community priorities, support wellbeing, and foster pride in place.



Bromford.



- Completed a full review of landscaping provision during FY23/24.
- Allocated budget in FY24/25 to enhance outdoor spaces, measured against the Bromford Home Standard.
- In-house development sites integrated ecological design and remediated polluted land at Douglas House.
- Restored and re-seeded a polluted school field to recover usable green space.
- Pilot BNG project at Pearl Lane in partnership with Worcestershire Wildlife Trust and Natural Networks.
- The landscaping and grounds maintenance teams adopted GIS services this year and are in the process of operationalising and exploring the potential of this key enabler in green infrastructure management, supported by Bromford's new data sciences team.
- Spent an additional £92.5k on enhancing green spaces, including a bulb planting initiative that saw us plant 12,000 bulbs across our sites.
- Created meadows across 163 communities (totaling 94,250 sqm), with a target to introduce 120 more sites in FY25/26.
- Planted an additional 70 trees and 500 native hedge whips to support habitat connectivity.
- Planted 750 shrubs as part of the annual replenishment programme.
- Recycled approximately 50 tonnes of woodchip and mulch, returned to shrub beds to suppress weeds and restore soil nutrients.
- Trialed organic weed management solutions as part of a phased approach to removing glyphosate-based herbicides.
- Delivered biodiversity and BNG training to 30 staff and held a customer workshop.
- Continued maintenance and monitoring of our Urban Wilding projects to increase biodiversity.
- Improved GIS mapping and risk data, and developed bespoke inspection software, enabling field staff to capture and view live tree data, including SSA locations.
- Purchased Bluesky data and perpetual license with support (£36k investment) to support digital mapping of our tree stock.



12,000
bulbs planted
in communal
areas

Case Study Reeves Court garden transformation

At Reeves Court in North Walsham, an unused laundry yard has been brought back to life as The Courtyard Gardens—a thriving community space supported by Flagship.

Customers and Flagship's Neighbourhood team joined forces with former Blue Peter gardener and current Head of Horticulture at Garden Organic, Chris Collins, for a hands-on workshop. Together, they sowed edible plants, built planters, and shared ideas for turning small urban spaces—like balconies and disused corners—into green, productive havens.

“This has been a really satisfying project with not only Flagship but their customers too... This is the sort of thing I'd love to see Flagship implement in other areas.”

Chris Collins
Head of Horticulture
Garden Organic



Outcomes

- ✓ Unused land transformed into a vibrant shared garden.
- ✓ New community skills in sustainable food growing.
- ✓ Multi-generational engagement and wellbeing benefits.



Looking ahead

Bromford Flagship will:

- ✓ develop our first Group-wide Nature Recovery Plan with measurable biodiversity KPIs and accountability mechanisms,
- ✓ test the feasibility of delivering BNG above the 10% requirement on selected developments, using modelling to inform investment decisions,
- ✓ expand the use of nature-based solutions for climate resilience, surface water management, and improved air quality,
- ✓ pilot customer-led stewardship programmes for shared green spaces in priority neighbourhoods,
- ✓ develop a monitoring framework to track biodiversity and nature recovery outcomes, ensuring continuous improvement.



T3: Resource Management

Sustainable management of natural resources.

C9. Does the housing provider have a strategy to use or increase the use of responsibly sourced materials for all building and repairs works?

Bromford Flagship is taking a practical, evolving approach to reducing the environmental and ethical impacts of material procurement across construction, repairs, and maintenance. Responsible sourcing is becoming increasingly embedded in how materials are specified, purchased, and managed, supported by close collaboration with suppliers.

Both organisations currently purchase the majority of their repairs and maintenance materials from Travis Perkins (Bromford 85% & Flagship 65%), who plays a central role in this approach by providing:

- access to responsibly sourced products, including FSC, PEFC, and BES 6001-certified options.
- emerging product-level sustainability data to inform purchasing decisions.
- delivery-level carbon reporting, improving visibility of transport-related emissions.
- best-practice sharing to influence and reduce environmental impact.

Bromford currently considers responsible sourcing in line with building regulations, engaging suppliers who prioritise sustainability and ethical practices, including reduced transport distances and sustainable manufacturing methods. Performance is tracked through the percentage of responsibly sourced materials used per project.

Flagship is raising awareness of environmentally preferable options within procurement and progressively embedding them into contracts and frameworks.

Looking ahead

Bromford Flagship will:

- ✓ begin systematically gathering supplier environmental and sustainability certification information to build a clearer picture of supply chain practices,
- ✓ further integrate responsible sourcing requirements into Group-wide procurement and tender evaluations,
- ✓ continue leveraging supplier relationships to share best practice and encourage sector-wide improvements in responsible procurement.



C10. Does the housing provider have a strategy for waste management incorporating building materials?

Bromford Flagship is committed to managing waste in a way that minimises environmental impact, supports circular economy outcomes, and delivers better value from resources. Both organisations have been strengthening their approaches over the past year, with an emphasis on improving data accuracy, increasing recycling and recovery rates, and embedding the waste hierarchy into day-to-day operations.

Bromford has been reviewing its waste management practices and exploring opportunities to improve efficiency and environmental outcomes, with a focus on reducing waste and improving how waste is tracked. A cross-functional working group has met to better understand the Group's current waste practices and to identify improvements across construction, property services, and other operational areas.

Flagship currently manages approximately 5,000 tonnes of waste each year across repairs, maintenance, and neighbourhood services. Around 99% of this waste is diverted from landfill, with broker reports confirming consistently high levels of recycling and material recovery. The focus now is on improving segregation at source, enhancing resource efficiency, and identifying further opportunities to close material loops.

Looking ahead

Bromford Flagship will:

- ✓ Undertake a group-wide review of waste management practices as part of the Sustainability Strategy.
- ✓ Develop a consistent, structured approach to waste reporting and performance measurement.
- ✓ Strengthen resource management across all operations, embedding circular economy principles.
- ✓ Identify opportunities to further reduce waste generation and improve recycling and recovery rates.

99%
of waste is
diverted from
landfill



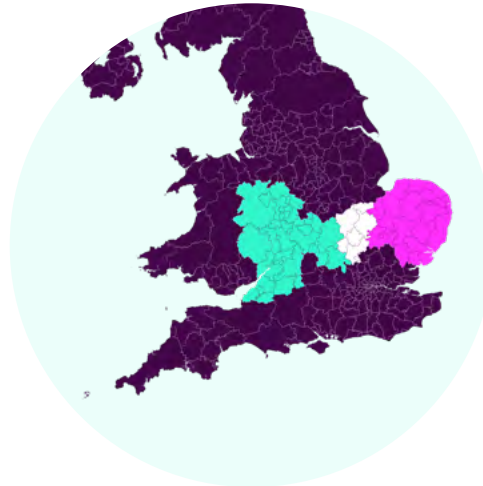
C11. Does the housing provider have a strategy for water management?

Bromford Flagship recognises the critical role that water conservation and improved water management play in building resilient, sustainable communities. How rainfall and surface water are managed across our homes, developments, workplaces, and public spaces directly affects environmental quality and customer experience. Effective water management helps reduce flood risk, protect against drought, improve local biodiversity, and ensure responsible use of a finite natural resource.

Our operating footprint spans the West Midlands, East Midlands, and East of England, regions now facing growing pressures on water resources. Recently, all three were declared to be in drought, with the East of England in particular experiencing long-term stress on supplies due to climate change, population growth, and housing demand. At the same time, all areas have seen episodes of extreme rainfall and localised flooding in recent years, highlighting the need for a balanced approach to water efficiency, storage, and drainage.

Current initiatives:

- ✓ Specifying water-efficient fittings and appliances as standard in all new homes and, where possible, in refurbishment programmes, including low-flow taps, showers, and dual-flush WCs.
- ✓ Using landscape design techniques to strengthen green infrastructure performance, such as integrating Sustainable Drainage Systems (SuDS) into site design to reduce flood risk, manage surface water, and limit pollution.
- ✓ Continuing to enhance and expand our green spaces, which help absorb rainfall and provide natural flood protection.
- ✓ Installing rainwater and grey water harvesting measures at workplaces and communal sites.
- ✓ Piloting rainwater tanks at selected communal housing schemes to provide water to tenants, to water their gardens.
- ✓ Improving soil quality around planted areas by incorporating organic matter, reducing compaction, planting deep-rooted species, and using ground cover to increase water retention, support biodiversity, and reduce surface runoff.



Case Study Project Raincatcher

As part of our commitment to water conservation and community resilience, Flagship has launched Project Raincatcher—a pilot initiative aimed at promoting sustainable water use across our neighbourhoods. To date, we have installed 26 water butts in selected communal areas, enabling customers to collect and reuse rainwater for garden maintenance. This simple yet effective solution helps reduce reliance on mains water, supports biodiversity through greener spaces, and encourages customers to actively participate in environmentally friendly practices.

We have also introduced a 2,700-litre mobile water bowser – named ‘Tank Sinatra’ – to support sustainable landscape management. Filled with harvested rainwater or wastewater from other activities, it has the potential to repurpose up to 125,000 litres of water annually. To reduce emissions, water is sourced as close as possible to the point of use, for example, we are using a Sustainable Drainage Systems (SuDS) pond at the William’s Park development for this project.

26
water butts
installed



125,000
litres of water could
be repurposed
annually

Social



T4 Affordability and security

Provides affordable and secure housing.

T5 Building safety and quality

Customer safety and building quality are well managed.

T6 Customer voice

Listens to customers.

T7 Customer support

Supports customers and the local community.

T8 Placemaking

Supports customers and the wider local community through placemaking.



T4: Affordability and security

Provides affordable and secure housing

C12. For properties that are subject to the rent regulation regime, report against one or more Affordability Metric: Rent compared to median private rental sector (PRS) rent across the relevant Local Authority and rent compared to the relevant Local Housing Allowance (LHA)

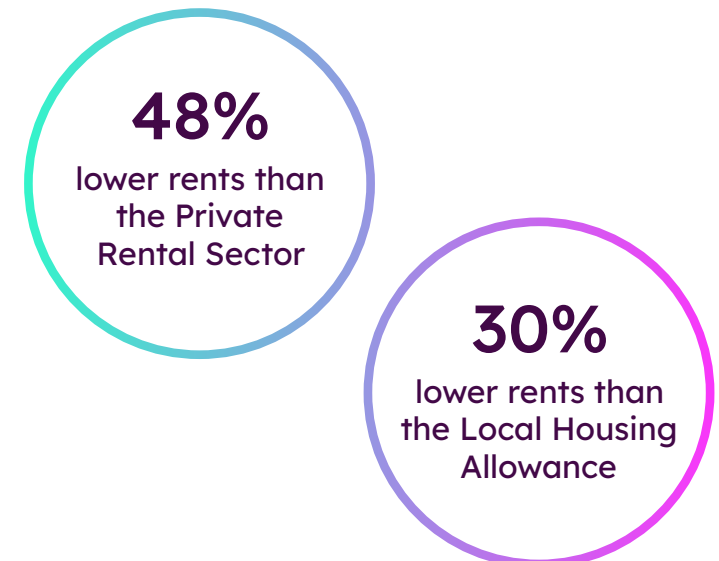
As a social landlord, our core mission is to provide safe, secure, and genuinely affordable homes to those most in need. Across Bromford Flagship, we continue to uphold this commitment by letting homes at rents significantly below market rates, helping customers access housing they may otherwise be unable to afford.

In 2024/25, our average weekly social rents remained substantially lower than both market rents and housing benefit benchmarks (Local Housing Allowance, which sets the maximum rent covered by housing benefit and Universal Credit in the private sector). Affordability percentages do fluctuate depending on the area and size of home, but overall, our rents remain significantly below market levels.

- Bromford's rents are on average 30% lower than the Local Housing Allowance (LHA) and 48% lower than Private Rental Sector (PRS) rents across its core operating areas, with variation by geography (for example, rents in South Gloucestershire are 41% below LHA, while in Lichfield they are 19% lower).
- Flagship's rents are on average 31% lower than the LHA and 48% lower than PRS rents, with variation by property type (for example, four-bed homes are 60% lower than PRS rent, while two-bed homes are around 43% lower).

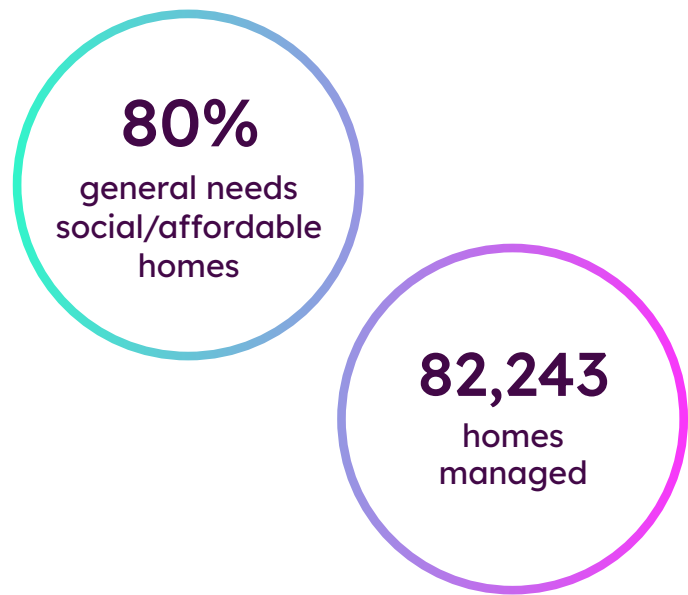
These affordability gaps are central to our social value offer, providing financial stability for customers, reducing risk of arrears, and enabling longer, more secure tenancies. As housing costs continue to rise across the UK, maintaining below-market rent levels helps prevent homelessness and supports community resilience.

Our rent setting approach is also aligned with long-term value for money objectives, balancing affordability with the financial sustainability needed to reinvest in our homes, services, and neighbourhoods. By continuing to offer secure housing at accessible rents, Bromford Flagship strengthens its role as an anchor institution within the communities we serve.



C13. Share, and number, of existing homes (owned and/or managed) completed before the last financial year allocated to:

In the 2024/25 financial year, a total of 82,243 properties were recorded across the Bromford and Flagship property portfolio. The vast majority of these completions were for general needs housing, with 68% (56,191 properties) allocated to social rent and a further 12% (10,095 properties) to affordable or intermediate rent. In total, 97% of all properties (79,810) fell within the social housing category, underlining the group’s commitment to delivering and managing genuinely affordable homes for its customers.



Tenure Type		Bromford Flagship	Percentage (%)
Social Housing	General needs (social rent)	56,191	68
	General needs (affordable/intermediate rent)	10,095	12
Supported housing for older people	Social rent	3,978	5
	Care homes	150	0
	Low-cost home ownership	7,344	9
	Leasehold	2,052	3
Total Social		79,810	97
Non-Social Housing	Staff accommodation	7	0
	Market rent	531	1
	Student accommodation	597	1
	Commercial	83	0
	Offices and resource	139	0
	Retained Freehold	1,076	1
Total non-social housing units		2,433	3
Total		82,243	100

C14. Share, and number, of new homes (owned and/or managed) that were completed in the last financial year, allocated to:

Tenure Type	Flagship	Bromford	Combined
Affordable rent	387	355	742
Social rent	78	17	95
Low-cost home ownership (includes shared ownership, shared equity products)	232	138	370
Open market sale homes	47	54	101
Total	744	564	1,308

In the 2024/25 financial year, 1,308 new homes were completed across Bromford and Flagship. 64% (837 homes) of all completions were for general needs social and affordable rent, reflecting the Group's continued focus on delivering genuinely affordable housing.

Looking ahead

Bromford Flagship's ambition is to build around 2,000 homes a year with an increasing number constructed through land led schemes using our in-house construction teams. We continue to receive sufficient new opportunities in all our regions to deliver our future programme requirements as we transition to Bromford Flagship.



25,000+
new homes
built by 2040

50%
of new homes will
be for social rent
from 2030

C15. How is the housing provider trying to reduce the effect of high energy costs on its customers?

As Bromford Flagship, we are committed to reducing the impact of rising energy costs on our customers. The merger has created new opportunities to share best practice and explore innovative solutions that support customer affordability and improve the energy performance of our homes.

We are delivering a range of targeted interventions from retrofitting homes to improve energy efficiency, installing smart thermostats, and hosting regular forums. We offer a variety of wraparound support to help customers manage energy costs, including advice on how to run their homes more efficiently and the provision of energy vouchers for those facing hardship.

To strengthen this approach, we are

- ✓ reviewing how we provide information and guidance
- ✓ improving customer communications to ensure energy advice is clear and accessible
- ✓ upskilling frontline staff to provide tailored support
- ✓ expanding our energy team, including Customer Liaison Officers.

We also partner with external organisations such as Green Energy Switch, offering personalised energy advice, support with tariff switching, and access to external funding where available

C16. How does the housing provider provide security of tenure for customers?

Customers moving into either a Bromford or Flagship home have been offered either a starter tenancy that converts to an assured (lifetime) tenancy after 12 months of satisfactory conduct, or an assured tenancy from the outset. Assured tenancies provide long-term security, enabling customers to build a stable and thriving life in their home for as long as they choose. Bromford Flagship no longer offers fixed-term tenancies, recognising that they offer less security than assured tenures.



T5: Building safety and quality

Customer safety and building quality are well managed

C17. Describe the condition of the housing provider's portfolio

Health and safety remain a top priority for Bromford Flagship. Ensuring our customers' homes are safe, secure, and compliant is fundamental to everything we do. While this year's data is reported separately for each organisation, our shared commitment to robust compliance, proactive risk management, and continuous improvement lays the foundation for a fully integrated approach. From the next reporting cycle, we will present a combined view that reflects our efforts as one organisation.

Safety and quality of Flagship homes (% of homes)



Safety and quality of Bromford homes (% of homes)



C18. What % of homes meet the national housing quality standard?

Bromford Flagship is committed to maintaining homes that are safe, warm, and of a good standard. We measure the quality of our homes against the Government's Decent Homes Standard, which assesses key criteria including state of repair, modern facilities, and thermal comfort.

As of the latest reporting period:

- 98.6% of Flagship homes meet the national housing quality standard
- 99.98% of Bromford homes meet the national housing quality standard

We finished the year with 148 homes classified as non-decent. 54 relate to works funded under SHDF Wave 3 (and will be completed Q1 25/26 to benefit from the funding) and the remainder a combination of HHSRS issues identified during stock condition surveys including fire door replacements, carbon monoxide monitors, and falls between levels. All works are planned for resolution.

We will continue to monitor compliance closely and take a proactive approach to addressing non-decent homes through planned investment programmes and improvement works.

99.6%

Flagship homes meet the standard

99.9%

Bromford homes meet the standard



C19. How do you manage and mitigate the risk of damp and mould for your customers?

Bromford Flagship recognise that tackling damp and mould is a critical priority for protecting customer health and wellbeing. Both legacy organisations have already made progress, from proactive customer engagement to improved case management, but we also recognise that further refinement is needed. By aligning our approaches and learning from each other, we are committed to delivering a consistent, proactive, and data-driven response across the Group, in full alignment with Awaab's Law and our duty of care to customers.

Theme	Bromford	Flagship
Overall approach to damp and mould	Bromford Neighbourhood Coaches identify damp and mould issues at the customers' annual review or visit if requested by a customer. The contact centre has developed a diagnosis script to identify and raise repairs that are the root cause. More complex cases are surveyed and managed by a specialist damp and mould team	Flagship launched a new Damp and Mould Programme aligned with Awaab's Law, with a strong emphasis on structured case triage across Housing, Energy, and Disrepair, and better use of system data. Significant improvements have been made to how cases are identified, tracked, and resolved. The new programme formalises responsibilities, strengthens case follow-through and ensures more consistent handling of cases
Sensor use	Sensors are used in complex cases where multiple causes can be contributing to damp and mould. Sensors were trialled to identify the effectiveness of retrofit on energy efficiency so that investment can be targeted to best outcome for customers.	COSIE Homes sensors have been deployed in homes with higher risk to monitor humidity and temperature. Live data enables earlier identification of rising issues, supports profiling across the stock, and helps target retrofit or behavioural interventions more effectively. This also lays the groundwork for more predictive, data-led services.
Systems and integration	All CD&M cases are raised on Dynamics CE which coordinates cross-team activity required to resolve cases. All contact information and surveys are saved against the case. This also links in to repairs progress via total mobile and complaints cases.	Damp and mould cases are fully managed within Dynamics for end-to-end visibility, task scheduling, and handover. Cases are integrated with Housing, Energy, and Disrepair to support coordinated action and prevent duplication. Survey data and contacts are logged centrally to ensure consistent case progression.

Theme	Bromford	Flagship
Customer engagement	Advice leaflets and information made available via the website. Neighbourhood Coaches have been trained on the causes and impact of damp and mould, now working with customers to identify causes and any changes, assisting with prevention.	Customer feedback is gathered after interventions to confirm resolution and assess satisfaction. This supports a broader strategy to improve customer experience through earlier detection, more consistent communication, and stronger service follow-through
Process and workflow	Case triage system in place: form, triage, mould wash and repairs, full survey, complex works, post inspection/feedback. Neighbourhood Coaches refer all ventilation/heating concerns. Improvements are noted regarding customer health and property condition.	A structured process is now in place and tracked in Dynamics, covering triage, mould wash, survey, repair, follow-up works, and customer feedback. Coordination across teams is supported by clear workflows, role assignment, and defined case stages, reducing delays and improving resolution quality.
Information for customers	Leaflets on condensation, damp and mould were sent to all customers in spring 2023. Website provides advice on heating homes efficiently.	An ongoing internal communications campaign delivered to strengthen customer engagement. Improvements have been made to letters, leaflets, emails, and follow-up calls to ensure clearer messaging and consistency across contact channels.
Training and culture shift	Mandatory eLearning has been developed. Targeted training for contact centre and neighbourhood coaches delivered. Refresher training given to CD&M surveyors and Stock Condition surveyors.	Key frontline teams received training through Bailey and Garner, supported by new eLearning modules for all colleagues. Training reinforces technical understanding, case handling expectations, and cross-team responsibilities.

Looking ahead

Bromford Flagship will continue to strengthen its long-term approach to managing damp and mould, building on the significant progress already made. The focus will continue with moving beyond reactive resolution towards greater prevention, earlier intervention, and a more consistent, data-driven service.

Key priorities

- ✓ launching a dedicated Healthy Homes Team in 2025 to bring together stock condition, compliance, and disrepair functions, improving oversight and accountability,
- ✓ expanding the use of sensor technology and data analytics to enable earlier identification of issues, improve pattern recognition, and target interventions more effectively,
- ✓ ensuring full alignment with Awaab's Law through enhanced surveying capacity in higher-risk periods and clearer, faster case handling,
- ✓ embedding a preventative, predictive service model that reinforces customer health and wellbeing and strengthens long-term property resilience.

T6: Customer voice

Listens to customers

C20. What are the results of the housing provider's most recent customer satisfaction survey?

Customer feedback is a cornerstone of how Bromford Flagship improves services. Listening directly to our customers provides vital insight into what is working well and where we must change. This enables us to identify priority areas for improvement, enhance service quality, and ensure we continue to meet the needs and expectations of those we serve.

Our most recent customer satisfaction survey reflects both the progress we have made and the areas requiring further attention. The results provide a clear evidence base to inform future action, helping us adapt, innovate, and deliver a consistently better experience for all customers.

Bromford.

Customer Thrive Index

Introduced in April 2023 to support Bromford's new strategy, this framework helps define what it means for customers to thrive, with four focus areas:

- Place-shaping and community impact
- A home that meets needs and inspires pride
- Financial wellbeing
- Mental wellbeing.

Bromford also continuously measures transactional interactions across various services from repairs to anti-social behaviour (ASB), contact services and neighbourhood coaching. Our customer advocacy target for March 2025 was 88% and we exceeded this, achieving 89.9%.

In addition to the feedback we collect from customers, we also use our management information data to support an evidence-based approach to insight – funnelling data from customer services, complaints, repairs and other channels to give a broad



10,000
telephone surveys
conducted
annually

89.9%
customer
advocacy

and transparent view of the voice of the customer. Benchmarking of our performance is completed with HouseMark.

Survey approach

Bromford conducts an annual telephone-based perception survey that gathers a mix of qualitative and quantitative data, which is then correlated with feedback from neighbourhood coaches. The survey focuses on overall wellbeing and community sentiment. In addition, Bromford carries out monthly telephone-based transactional surveys, speaking to 10,000 customers each year.

Bromford. cont.



Use of data

Bromford utilises spatial mapping and open data, such as the Co-op Wellbeing Index, to understand localised satisfaction and wellbeing trends. Transactional surveys are used to inform service improvement plans, for example reducing repair waiting times, improving communication, and enhancing experiences during complaints and antisocial behaviour cases. Customer feedback is then analysed and shared with regional boards and colleagues to address key themes and drive improvements in overall customer experiences.



Customer Journey Insight

Flagship continuously assesses satisfaction across key customer journey stages, including moving in, repairs and raising concerns. In 2024/25 we achieved an overall satisfaction score of 84.4%, with positive feedback highlighting staff professionalism and empathy.

Survey approach

Flagship conducted Customer Tenant Satisfaction Measures (TSM) surveys throughout the year across all tenure types, using a representative sampling method led by independent agency IFF Research. In total, 2,401 responses were received from Low-Cost Rental Agreement (LCRA) customers and 338 from Low-Cost Home Owner (LCHO) customers. The survey was carried out primarily by phone (78.7%), with 20.7% completed online and 0.6% in person. An additional 85 responses were gathered through targeted face-to-face outreach to engage hard-to-reach groups.

Use of data

The data from surveys informs service improvements, including reducing repair waiting times and improving communication (e.g. callbacks). Customer feedback is analysed and shared with staff across departments to address key themes and improve customer experience.

84.4%
overall
satisfaction

2,739
TSM responses
received
(LCHO and LCRA)



Tenant Satisfaction Measures (TSMs)

Overall, 35,000 customers across both organisations participated in 2024/25. Bromford Flagship's overall satisfaction was 80.4%, performing well in the eighth decile. Individually, Bromford scored 84.1% (-1.3%) and Flagship scored 75.6% (+3.7%) – in the ninth and sixth deciles respectively.

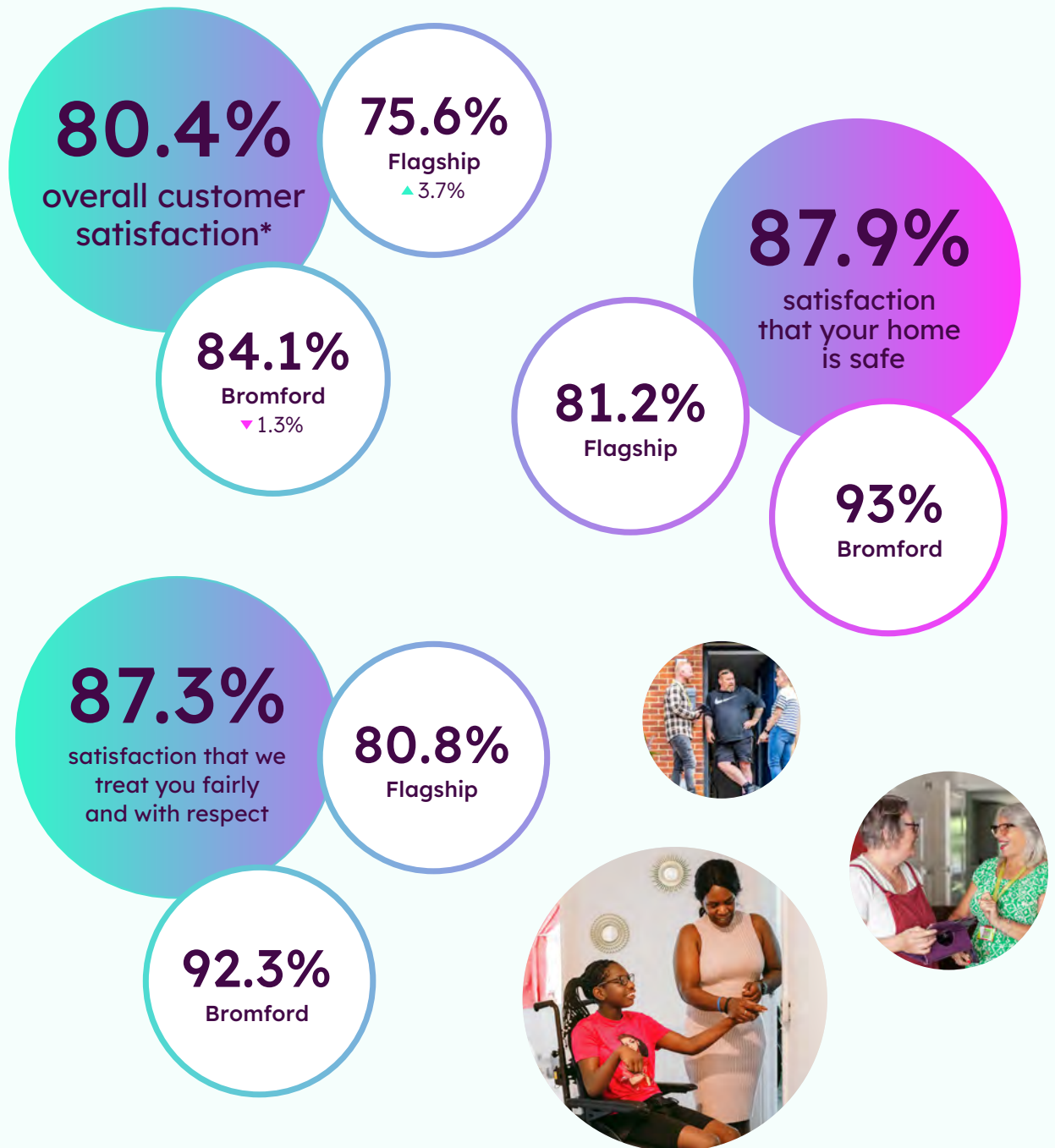
Of the TSMs, 11 are relative strengths, within the top three deciles, and only four in the bottom three deciles¹, all of which relate to landlord management information. Improvement plans are in place for complaints, repairs and compliance metrics showing an improving picture over quarter one.

Before the merger, Flagship approached a sample number of customers to take part in the TSM survey. For 2025/26, Flagship have aligned with Bromford's census-based approach to reach out to every customer each year, and we've employed three new Insight Advisers to support the increase in telephone surveys for Flagship customers.

Click below to see our individual results for the 2024/25 TSMs and a full account of our improvement actions.

Bromford TSMs
2024/25

Flagship TSMs
2024/25



Across Bromford Flagship, we place the voice of our customers at the heart of decision-making. Feedback from our most recent customer satisfaction surveys, alongside insight gathered from day-to-day interactions, complaints, and service reviews, informs how we design and deliver improvements.

Turning feedback into action

- ✓ **Customer engagement** – Bromford's engagement plan gives customers multiple ways to shape services, from local influence networks to scrutiny panels and workshops. Flagship's customer engagement framework supports regular service reviews, scrutiny opportunities and customer journey assessments to enhance the overall customer experience.
- ✓ **Service improvement** – Feedback has led to practical changes, including improving repair turnaround times, enhancing complaint handling, and increasing the clarity and timeliness of communications.
- ✓ **Digital transformation** – Bromford is co-designing a new portal and app with customers, while Flagship's Essentials programme has introduced a single CRM and omni-channel capability to improve service tracking.
- ✓ **Repairs** – Both organisations have focused on fixing repairs right the first time, improving appointment communication, and increasing engineering capacity.

Looking ahead

As Bromford Flagship, we will build on these approaches to create a unified, transparent framework for capturing, analysing, and acting on customer insight, ensuring we continue to improve the services that matter most to our customers.



Community case study

David Garrick Gardens, Lichfield

Fire safety communications

A Fire Safety Officer discussed the results of the Fire Service Inspection and reiterated the importance that no personal items should be stored outside flat doorways and that the scheme had received a good score.

Safety improvements

Various suggestions for further scheme improvements fed back, including the potential to slab an area of grass in the communal garden to have a bench and table for customers to enjoy during the warmer weather



Community case study

Berkeley House, Staple Hill, Bristol

Fire safety communications

On St Patrick's day, a quiz took place at Shrubbery Court to encourage customers to remain well-informed about fire safety, in a fun setting, whilst testing their Irish knowledge.

Safety improvements

Door knocking took place to inform customers we must check each flat door key to ensure that it works properly and to let customers know about the removal of the fire alarm sounder from the entrance hallway of each flat as the current set-up contradicts the 'stay put' fire strategy.



C21. What arrangements are in place to enable customers to hold management to account for the provision of services?

As a social landlord with a community focus, Bromford Flagship is committed to ensuring that customers are listened to and actively empowered to hold us to account for the services we deliver. Across both legacy organisations, well-established engagement frameworks are in place to amplify the customer voice and embed values of transparency, scrutiny, and continuous improvement into how we work. These include customer panels, scrutiny groups, formal complaints processes, and opportunities for customers to participate in governance. Our arrangements are designed to align with the requirements of the Social Housing (Regulation) Act and give customers a meaningful role in influencing decisions and services that respond to their needs.

38,000

individual annual conversations held



Bromford.

Tenant engagement

Neighbourhood coaches maintain day-to-day relationships with customers through open, honest conversations. Every household is invited annually for an in-depth review of their home, services, and aspirations.

Customer insight and feedback

Over 38,000 individual annual conversations held and 35,000+ TSM survey responses gathered by March 2025. Feedback is compiled in a quarterly Voice of the Customer report, combining complaints, customer service data, repairs and social media insights.

Formal structures and governance

The Customer and Communities Influence Network (CCIN) and Locality Influence Networks (LINs) play a key role in scrutiny. CCIN members are supported by TPAS and have a clear route to the boardroom.

Use of digital platforms

Qualtrics is used to track customer advocacy, with data reported monthly. LINs tailor engagement based on what matters locally.

We have a digital platform for involved customers called Bromford Voice where customers take part in polls, review policies and post questions.

Service improvement and accountability

Insight from CCIN informs scrutiny and engagement priorities. Customer insight has been linked to sustainability performance, tying customer advocacy to a financial loan indicator. Customers are involved in the end-to-end design of key services such as repairs. More recently, we undertook a scrutiny project for service charges.

External collaboration and local presence

Local relationships are fostered through the Neighbourhood and Community teams, engaging with MPs, councillors, and partners to address service issues. Place based teams provide local opportunities for engagement tailored to the needs of customers.



Tenant engagement

Flagship's Engagement Framework – formerly the INfluencer Network – offers meaningful and accessible opportunities for customers to engage at three levels: Group, Local, and Personal. The framework enables customers to influence services through structured engagement, collaborative reviews, and co-creation.

Customer insight and feedback

The INfluencer Hub enables over 400 registered users to provide feedback through surveys, polls, and forums, with 6,000+ visits to date. The Hub also supports local campaigns, including biodiversity initiatives and Neighbourhood Champions. Customer feedback and resulting improvements are summarised and published openly to demonstrate value.

Formal structures and governance

Flagship launched a Customer Committee (now Customer Influence Group) in September 2024 with 8 independent members (including shared owners), giving a formal voice to customers on key issues. Following the merger, a Customer Influence Panel of 6 members (3 Flagship, 3 Bromford) is redesigning the engagement framework.

Use of digital platforms

The digital INfluencer Hub allows interactive engagement with customers at any time, from any location. It supports digital polls, surveys, and discussion forums and promotes opportunities to get involved through volunteering and community initiatives.

Service improvement and accountability

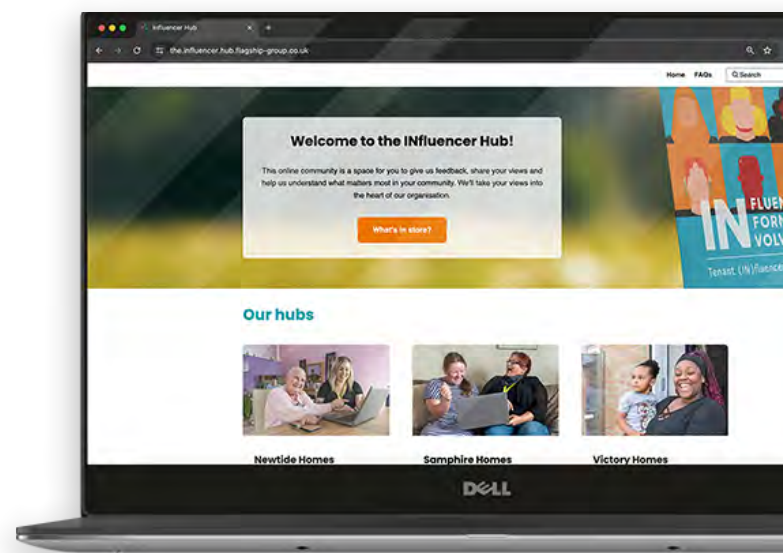
Spotlight reviews and co-creation opportunities bring customers into the early stages of service redesign. Group Panels on key topics (e.g., complaints, digital, accessibility) meet with staff and review performance data. Local involvement activities such as door-knocking and pop-ups help resolve specific issues and shape services.

External collaboration and local presence

Customer-facing teams support local involvement by engaging directly with communities. Pop-ups, campaigns, and events (e.g., anti-social behaviour, communal spaces, rewilding) provide place-based influence opportunities.

Looking ahead

As Bromford Flagship moves forward with its place-based strategy, we will build on these strong foundations by further tailoring services to local need, deepening our relationships with communities, and enhancing the role of customers in shaping neighbourhood-level priorities. This will include strengthening locality influence structures, embedding accountability through both digital and in-person channels, and aligning customer engagement more closely with service planning. By doing so, we will ensure that customers remain central to governance and decision-making.



C22. In the last 12 months, in how many complaints has the national Ombudsman determined that maladministration took place?

Bromford Flagship recognises that Housing Ombudsman (HO) determinations provide an important measure of accountability and a valuable opportunity to learn and improve.

Over the past 12 months, a total of 50 complaints were reviewed by the HO, we received 38 maladministration findings and 3 severe maladministration findings in total. Recurring themes highlighted the need for more consistent complaint handling, stronger communication, and closer contractor oversight.

In 2024/25, we received 2,758 stage 1 complaints and 280 stage 2 complaints, with 90% resolved without the need for escalation. This reflects the impact of our focus on early resolution, supported by clearer policies, better systems, and stronger skills for our complaint handlers.

Using insights from complaints is essential for driving service improvements and ensuring customers receive an enhanced service in the future. Over the past year, we have focused on improvements and remain intent on applying the lessons learned from complaints to shape better outcomes. In our last report, we made a number of commitments based on our findings and we are pleased to share progress against these commitments in this report.



Bromford.



For the period 1 April 2024 to 28 February 2025, the Housing Ombudsman can make a number of findings for each case. Out of 69 findings, they determined the following results:

For the period 1 April 2024 to 28 February 2025, the Housing Ombudsman can make a number of findings for each case. Out of 33 findings, they determined the following results:

Maladministration:

24

Severe maladministration:

3

No maladministration:

16

Service failure:

14

Reasonable redress:

12

Complaint handling failures:

0

22

of our complaints were reviewed by the Housing Ombudsman

Maladministration:

8

Severe maladministration:

0

No maladministration:

9

Service failure:

10

Reasonable redress:

4

Complaint handling failures:

3

19

of our complaints were reviewed by the Housing Ombudsman

The Ombudsman found no complaint handling failures or cases of non-compliance.

For the period 1 March to 31 March 2025, the Housing Ombudsman can make a number of findings for each case. Out of 16 findings, they determined the following results:

Maladministration:

6

Severe maladministration:

0

No maladministration:

4

Service failure:

2

Reasonable redress:

3

Withdrawn/
closed complaints:

1

Complaint handling failures:

0

9

of our complaints
were reviewed by the
Housing Ombudsman

Looking ahead

Bromford Flagship will continue to strengthen its complaints management framework, embedding HO learning into service design and colleague training. Our priority is to reduce maladministration findings by improving timeliness, consistency, and empathy in complaint resolution, while ensuring that customer voice and accountability remain central to how we deliver services.

See our **Annual Complaints Performance and Service Improvement Report**

T6: Customer support

Supports customers and the local community

C23. What are the key support services that the housing provider offers to its customers?

Bromford Flagship has a strong track record of providing targeted support services that help customers sustain their tenancy. These services have been shaped around the diverse and evolving needs of our customers, offering tailored advice, coaching, and access to specialist help where needed. From supporting people through financial difficulty to promoting wellbeing and independent living, both organisations have prioritised stability and resilience.

As we come together as a single, larger organisation, Bromford Flagship is committed to going further, strengthening our support offer through an evolving place-based model. This means adapting localised services to the realities of each community, intervening earlier and ensuring customers are aware of and can access the right support at the right time, enabling them to thrive in their tenancies.

Bromford.

Tenancy Support and Coaching

Neighbourhood coaches support customers to thrive, focusing on strengths, aspirations, and community involvement. Small patch sizes (200–250 homes) enable personalised support, and every customer receives at least one visit per year.

Income and financial support

Income Management Advisors offer home visits, benefit support, and referrals to external agencies. A dedicated income line and email service are also available.

Health, wellbeing and crisis support

Coaches help connect customers to local health and wellbeing services, and support access to external networks and community partners.

Aids and adaptations

Signposts to relevant support; neighbourhood teams help identify and escalate needs.

Partnership working and signposting

Neighbourhood coaches build links with local clubs, community groups, and voluntary organisations to enable thriving neighbourhoods.



Tenancy Support and Coaching

Flagship provides tailored housing support through a holistic model, ensuring customers feel secure and supported. Dedicated teams help with tenancy sustainment, health, finances, and emergency support.

Income and financial support

Flagship provides one-to-one money management and income maximisation support, helping customers budget and access benefits, grants, and financial aid

Health, wellbeing and crisis support

Collaborates with health services and charities for health and wellbeing support. Offers crisis intervention for customers facing emergencies such as ASB, domestic abuse, or safeguarding issues.

Aids and adaptations

Dedicated resources to deliver aids and adaptations (e.g., ramps, handrails, stairlifts) for customers with health or mobility needs.

Partnership working and signposting

Flagship works in multi-agency partnerships and signposts customers to appropriate charities, services, or public agencies when specialist help is needed.



T8: Placemaking

Supports customers and the wider local community through placemaking

C24. Describe the housing provider's community investment activities, and how the housing provider is contributing to positive neighbourhood outcomes for the communities in which its homes are located.

At Bromford Flagship, we are embedding a more strategic, accountable, and data-informed approach to community investment. Our aim is not simply to build homes, but to help create thriving, resilient neighbourhoods, socially, economically, and environmentally through a place based approach.

Bromford.



In 2024, Bromford launched a series of Place Pilots to shape how we design and deliver services with deeper local engagement. Place teams work with customers, community assets and stakeholders to produce better outcomes in specific neighbourhoods.

This approach enables us to consider wider factors, such as employment trends, educational outcomes

and health provision, when designing local delivery plans. One example includes the integration of a new housing development with an established community, where the focus extends beyond the physical homes to the creation of a resilient, socially connected neighbourhood supported by strong infrastructure.

Flagship has delivered several targeted, co-designed regeneration projects with clear community benefit:

Saxon Road, Saxmundham – used immersive technology (the 'See it First' augmented reality app) to support customer-led design of new homes and public spaces.

Green Lane, Fakenham – reimaged a fire-damaged estate through collaborative design workshops, resulting in affordable homes and shared spaces.

Icwell Hill, Newmarket – hosted customer workshops to identify local priorities and inform long-term neighbourhood improvements.

The Abbey, Thetford – four years of sustained engagement have helped shape a regeneration masterplan, supported by bus tours, MP visits, FAQs, and consultations.



Social Value Framework

To drive consistency and accountability across the group, we have developed our first Bromford Flagship Social Value Framework, which sets out how we generate, monitor and evaluate social impact through

- ✓ sustainability-linked finance (e.g. SLLs supporting place-based investment),
- ✓ supply chain leverage through procurement commitments,
- ✓ community-led asset mapping (e.g. pilot in Priors Park with Go Together – funding requested),
- ✓ partnerships with local authorities, NHS partners, and third sector organisations,
- ✓ a newly established Social Value Group to co-ordinate group-wide efforts and provide monthly oversight.

We are in the early stages of rolling out the Social Value Engine, a nationally recognised tool that will enable us to capture, report and evaluate the social and environmental outcomes of our community investment activities in a consistent and evidence-based way.

Bringing Bromford and Flagship together presents a valuable opportunity to review and unify our approach to community investment, aligning it more tightly with our new corporate strategy, sustainability ambitions and ESG commitments.

The Sustainability Group will support this by providing oversight for monitoring, reporting and strategic coordination across the group. Together, these efforts reflect a maturing, organisation-wide commitment, where every team contributes to creating better places to live and community voice shapes not just the outcomes, but how we work.



Bromford.

In 2024/25, Bromford helped to secure over £2 million in external funding for community-led projects across Gloucestershire and the wider Midlands region, delivering measurable social value in the neighbourhoods we serve. These funds supported charities and not-for-profit organisations with

- refurbishments and equipment,
- core costs such as rent, salaries and utilities,
- play parks, fitness sessions and food pantries,
- specialist support for older people and those with health conditions like Parkinson's and Multiple Sclerosis (MS),
- digital inclusion and youth engagement,
- start-up support for local entrepreneurs.

HOPESTEAD

**HOPE
STEAD** **EVERYONE
DESERVES
A PLACE TO
CALL HOME**

Hopestead is Flagship's charity, founded to end homelessness with the core belief that everyone deserves a place to call home. With a focus on prevention, support and advocacy, they work to stop homelessness before it starts, help people settle and thrive in their new homes, and speak up for those who often go unheard.

Through their four core initiatives – Hope at Home, Hope Funds, Building Hope and Voice of Hope – they provide practical resources, financial support, innovative housing solutions, and a powerful voice for change.

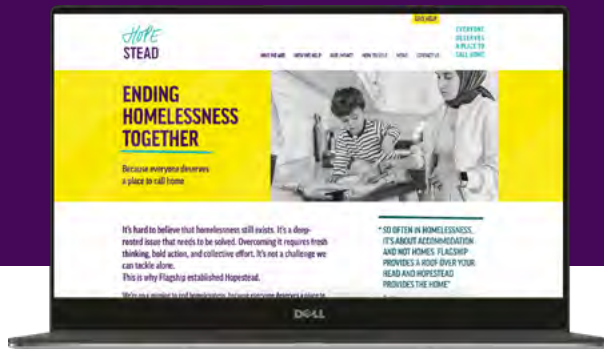


HOPE AT HOME

- A total of **670** people, **408** adults and **262** children were supported through Hope at Home.
- We provided **543** white goods so people could cook meals, store food and clean their clothes.
- The total value of support provided through Hope at Home was **£1.1 million**.
- **78%** of the people we supported through Hope at Home had a reduced risk of homelessness.
- **97%** have sustained their tenancies.

LEARN MORE ABOUT HOPESTEAD ONLINE

Read the **24-25**
Impact Report ›



HOPE FUNDS

- **8,256** people accessed homelessness prevention support through Hope Funds.
- Through Hope Funds we reduced the impact of homelessness for **1,677** children.



Case study Travis Perkins CSR Contributions

Travis Perkins' CSR contribution, linked to our procurement activity, enabled Bromford and Flagship to support a range of community projects including:

- £20k to **Boxing Clever**, a Community Interest Company (CIC), plus ongoing support for grants and consultancy,
- £10k to Woodmancote for ongoing support for the **Parish Council and Playpark committee** for additional grants. We are now dealing with the next phase - a sports pitch,
- £35k to **World Jungle**, plus ongoing support,
- £1k to Personal Protective Equipment (PPE) Supplied to the **Property Maintenance and Plumbing pipeline** students to enable them to participate in work placements,
- £10k towards a new **state-of-the-art bin solution** installed to reduce unsightly waste, encourage more responsible disposal behaviour, and improve recycling rates. The units feature green roofs to enhance visual impact, lockable keypads to prevent misuse, and improved fire safety measures to better protect customers and the environment,
- £46k additional funding for **Hopestead's 'Hope now' project**.

“Thanks to the Travis Perkins CSR funding, we were able to provide essential household items to individuals moving into a Flagship property after experiencing homelessness. These items may seem small, but they make a significant difference for those who cannot afford them. By helping to furnish their new homes, we’re not just filling rooms, we’re helping to create a sense of comfort, dignity, and belonging, helping people settle in more quickly and confidently, turning four walls into a true home, and giving them a stronger foundation to sustain their tenancies long-term.”

Lucy Parish
Director of Operations
Hopestead



Governance



T9 Structure and governance

Legal structure of the organisation and its approach to Governance

T10 Board and trustees

High quality board of trustees

T11 Staff wellbeing

Supports employees

T12 Supply chain management

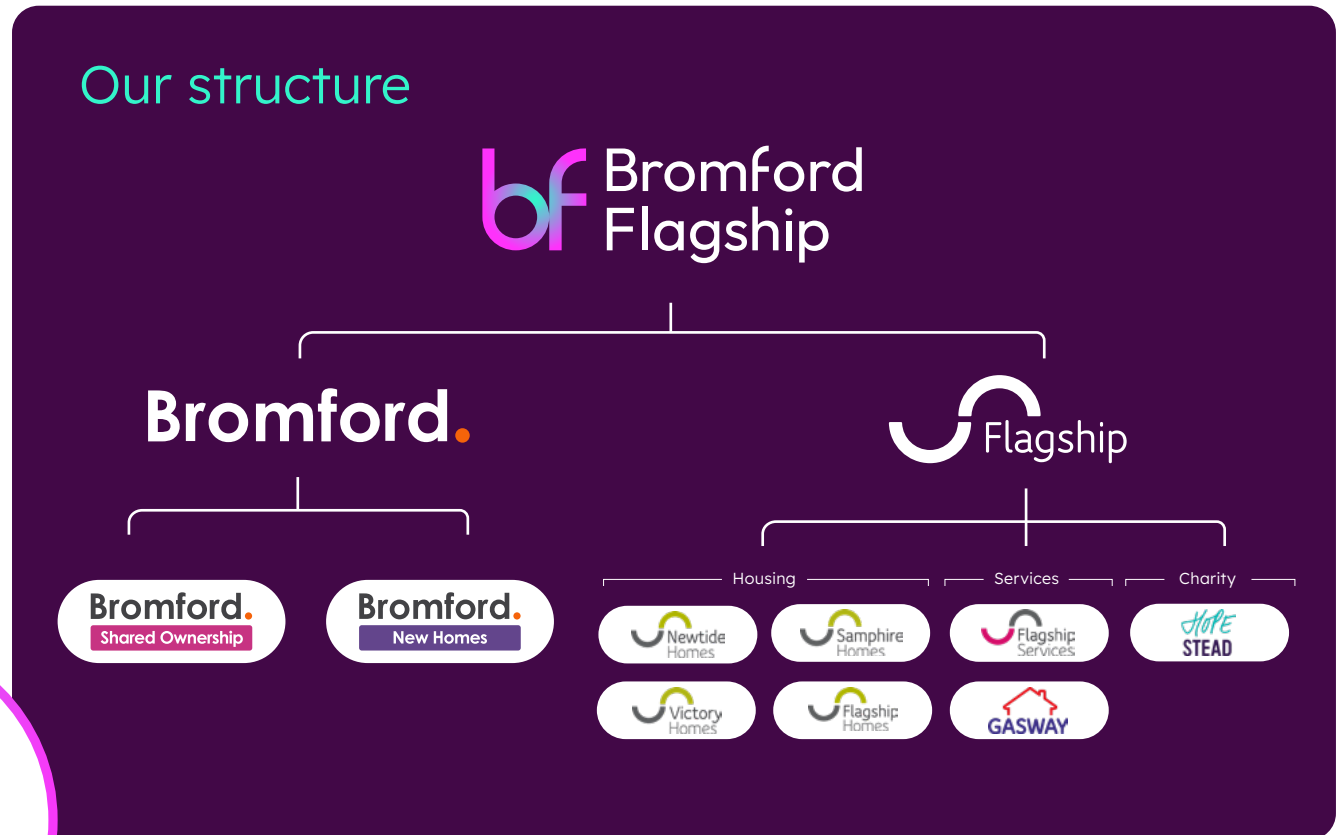
Procures responsibly

T9: Structure and governance

Legal structure of the organisation and its approach to governance

Bromford Flagship has been operating as a merged organisation since 28 February 2025 and is regulated by the Regulator of Social Housing (RSH).

We maintain a transparent and constructive relationship with the RSH, engaging openly on all matters affecting the organisation and the wider sector. Following the merger, Bromford Flagship moves forward as a **G1/V1** rated organisation - the highest grading for governance and financial viability - due to our robust governance framework, effective risk management processes, and sound financial oversight.



Governance and regulation remain at the heart of our operations. We continually strengthen internal controls, enhance Board and Committee oversight, and uphold a culture of transparency and accountability, delivering long-term value, resilience and high-quality services for our customers and communities.

The table below reflects the 2024/25 reporting year (April 2024 – 28 February 2025), during which Flagship and Bromford operated as separate entities prior to formal merger.

Reporting criteria	Bromford	Flagship
C25: Is the housing provider registered with the national regulator of social housing?	Yes	Yes
C26: What is the housing provider's most recent regulatory grading/status?	G1/V1	G1/V2 (re-upgraded from G2 to G1 in February 2025)
C27: Which Code of Governance does the housing provider follow, if any?	The Registered Provider's (RP) in the Bromford Housing Group adopted the UK Corporate Governance Code 2018.	Flagship Housing Group adopted the NHF Code of Governance 2020, prior to the merger with Bromford Housing Group.
	Since 28 February 2025 Bromford Flagship has voluntarily adopted the UK Corporate Code of Governance 2024.	
C28: Is the housing provider a Not-For-Profit?	Yes	Yes

Reporting criteria	Bromford	Flagship
C27: Which Code of Governance does the housing provider follow, if any?	Bromford adopted a robust risk management process. The board sets risk appetite, defines tolerances and receives regular updates on risk. ESG risks are embedded in strategy.	Flagship's ESG risk management framework included Risk Appetite, Strategic and Operational Risk Maps, Assurance Map, TOCS (Threats, Opportunities, Challenges and Strengths) tool and annual controls assurance.
	The new Bromford Flagship risk management framework combines our approaches to managing principle, strategic and operational risks, and takes account of ESG related risks.	
C30: Has the housing provider been subject to any adverse regulatory findings in the last 12 months – data protection breaches, bribery, money laundering, HSE breaches etc. - that resulted in enforcement or other equivalent action?	No enforcement action has been taken from the RSH, Information Commissioner's Office, Health and Safety Executive or areas of bribery and anti-money laundering.	No enforcement action has been taken from the RSH, Information Commissioner's Office, Health and Safety Executive or areas of bribery and anti-money laundering. There is ongoing work with Suffolk Fire and Rescue Service relating to a potential HSE breach in one of Flagship's tall buildings.

T10: Board and trustees

High quality board of trustees

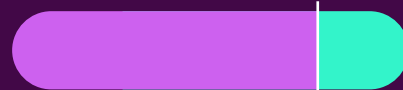
C31. How does the housing provider ensure it gets input from a diverse range of people into the governance processes? Does the housing provider have policies that incorporate Equality, Diversity and Inclusion (EDI) into the recruitment and selection of board members and senior management, and do they consider the resident voice at board and senior level?

We want to embed Equality, Diversity, and Inclusion (EDI) into all aspects of governance. Both legacy organisations had strong foundations in place, with EDI policies and training in place that guides open, transparent, and equitable recruitment processes for board and senior leadership roles. These ensure our board and senior leaders are equipped with the skills, experiences, and perspectives needed to govern effectively.

Find more information
about our board members
on [our leadership webpage](#)

Our board profile (as at 27 Feb 2025)

Bromford.



87% Male 13% Female

100% White British

Average age: 59

No declared disabilities

No customer board members

 **Flagship**



75% Male 25% Female

100% White British

Average age: 61

No declared disabilities

Customer Committee

(as at 28 Feb 2025)

 **Bromford
Flagship**



77% Male 23% Female

100% White British

Average age: 62

No declared disabilities

No customer board members

Reporting criteria	Bromford	Flagship
C32: What % of the housing provider's Board and Senior Management team have turned over in the last two years?	<p>2022/23 - 2 x board members resigned, and one board member was appointed.</p> <p>2023/24 - no changes to the Board.</p> <p>2024/25 - 1 x member of the Executive Team resigned, and 1 x Executive member was appointed.</p>	<p>2023/24 - 1 x Non-Executive Director (NED) resigned, one Executive Director joined and 3 x co-optees became NEDs.</p> <p>28 Feb 2025 - 3 x Executive Directors resigned, and 3 x NEDs resigned immediately prior to the new Bromford Flagship Board being formed.</p>
C33: Number of board members on the housing provider's Audit Committee with recent and relevant financial experience.	1	3 (prior to merger)
C34: % of Board who are Non-Executive Directors	75%	67% (prior to merger)
C35: Has a succession plan been provided to the housing provider's board in the last 12 months?	In 2023/24, the succession plan was reviewed and updated after an external board effectiveness review. Work is still ongoing.	<p>Succession and skills planning took place as part of the merger.</p> <p>A board skills review was also undertaken to regain G1 status in 2024/25.</p>
C36: For how many years has the housing provider's current external audit partner been responsible for auditing the accounts?	4 years	3 years
C37: When was the last independently-run, board-effectiveness review?	Campbell Tickell 2023/24	Altair November 2023
C38: How does the housing provider handle conflicts of interest at the board	<p>Annual declarations and policy are in place.</p> <p>Conflicts reported and reviewed.</p> <p>Policy covers group-level conflicts.</p>	<p>Declarations at each meeting recorded in minutes.</p> <p>Members withdraw if conflict arises.</p> <p>Annual disclosure exercise and policy in place.</p> <p>The process was governed by Standing Orders.</p>

T11: Staff wellbeing

Supports employees

C39. Does the housing provider pay the Real Living Wage?

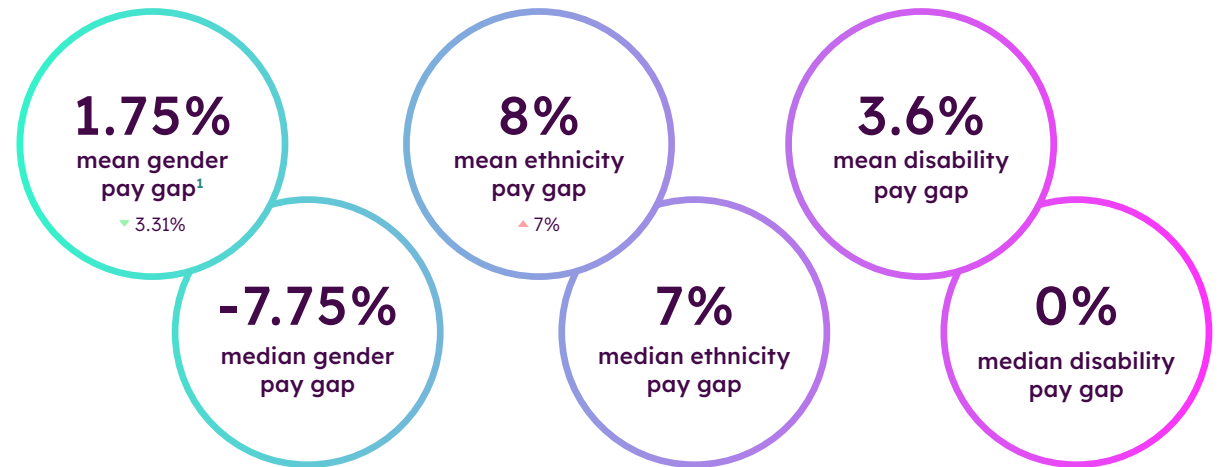
Both Bromford and Flagship ensure that all staff are paid the Real Living Wage (apprentices receive the National Living Wage for their age bracket and their training costs) and will continue to do so.



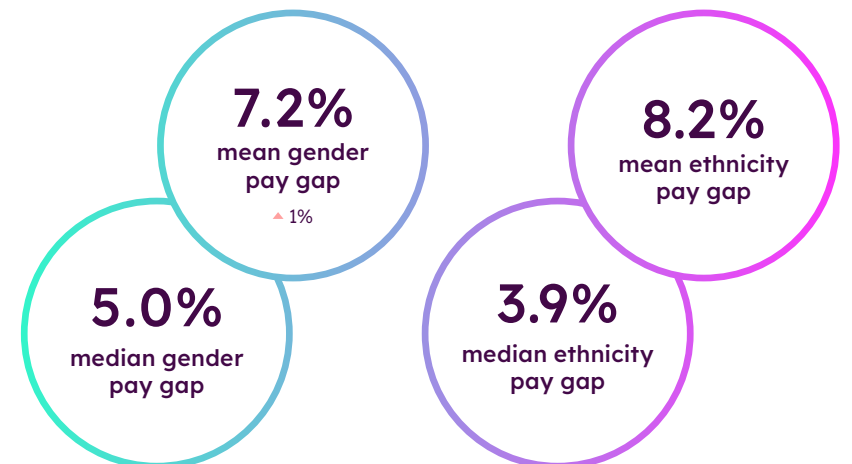
C40. What is the housing provider's median gender pay gap?

Bromford and Flagship both publish pay gap reports covering gender, ethnicity, and disability (Flagship only). These numbers reflect our gender pay gap reports for 2023-24. The first combined Bromford Flagship gender pay gap report for 2024-25 is due for publication in December 2025.

Flagship's mean and median gender, ethnicity and disability pay gap



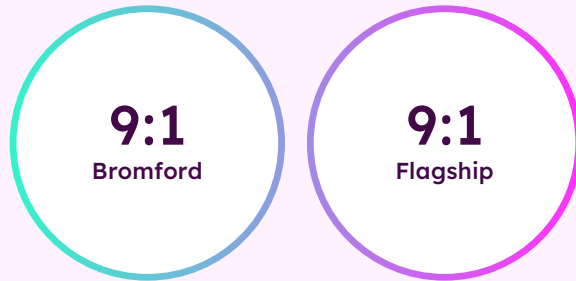
Bromford's mean and median gender and ethnicity pay gap²



¹ The mean and median gender pay gap for Gasway (Flagship's gas services and maintenance subsidiary) in 2023/24 was 24.72% and 34.42% respectively. Gasway's pay gap results are reported independently to Flagship.

² 2023-24 was the first year that Bromford reported on its ethnicity pay gap. Bromford is yet to report on its disability pay gap figures.

C41. What is the housing provider's CEO:median-worker pay ratio?



C42. How is the housing provider ensuring equality, diversity and inclusion (EDI) is promoted across its staff?

Bromford and Flagship are united in our belief that embracing equity, diversity and inclusion creates a thriving workplace. While our approaches reflect the unique cultures of each organisation, we share a commitment to creating inclusive environments where everyone can be themselves, feel valued, and succeed. By fostering inclusivity we not only enhance accessibility but also strengthen a sense of belonging for our colleagues and customers.

Bromford.

Training and learning

Colleagues are required to complete mandatory Equality, Diversity and Inclusion (EDI) eLearning every two years, with 100% compliance achieved by the end of the year. Unconscious bias training is mandatory for leaders and available to all colleagues. In 2023/24, menopause training was introduced alongside the Female Accelerator programme, which supports the development of female leadership. Bromford has been nominated for awards at Housing Heroes and Women in Housing for three consecutive years, and in June 2025 it launched training on neurodiversity.

Networks and employee groups

A number of networks have been set up across the business with membership from colleagues and managers, which include:

- Race and Faith (13 members)
- LGBTQIA+ (33)
- Disability, Neurodiversity and Carers (15)
- Age and Gender (12 members)
- Mental Health and Wellbeing (64 members)
- Menopause Champions (20 members)
- Forces Friendly (26 members)

All groups are supported by an overarching Be You group.

Campaigns, awareness and events

Each year, an annual 'Be You' roadmap sets out the events and campaigns planned across the organisation, including Black History Month, Carers Week, and International Women's Day, as well as activities for National Inclusion Week featuring guest speakers and 'Inclusion Ally' learning sessions. Bromford also takes part in Pride events across its areas each year. In January 2025, the organisation held its first in-person 'Be You' conference, bringing together all champion groups to host talks and activities, including a panel discussion with external professionals to help shape future EDI plans.



Policies, impact and representation

Equality, Diversity and Inclusion (EDI) is embedded in performance management through the 'Be You' DNA and core competency assessment. The organisation has achieved Disability Confident Level 2 employer status and was awarded Menopause Friendly Accreditation in August 2024. It is also a Bronze signatory of the Armed Forces Covenant.

Inclusive services and accessibility

Access audits have been completed across main offices, with a plan to make all workspaces fully accessible within two to five years. A language line is available to colleagues, work is underway to make learning fully inclusive, and a new reasonable adjustments policy with training for customer-facing teams will launch in 2025.



Training and learning

All colleagues complete mandatory EDI eLearning every three years, with 96% compliance. Unconscious bias training is delivered during induction and line managers undertake Inclusive Leadership Training. Customer Experience Communication Adjustment training has reached 90% compliance, and Hate Crime and Anti-racism Awareness Training has achieved 98% compliance. Since February 2025 all colleagues are enrolled in in-person Professional Boundaries and Sexual Harassment in the Workplace training, which is renewed every three years. 'Knowing Our Customer' training is also being delivered to housing managers and customer-facing teams.

Networks and employee groups

- Family Network (13 members)
- Disability and Neurodiversity Network (17 members)
- Social Mobility Network (7 members)
- Gender Equity and Pride Network (6 members)
- Domestic Abuse Champions (17 members)
- Menopause Champions (25 members)
- Armed Forces Network (27 members)

Campaigns, awareness and events

The organisation maintains an inclusion calendar highlighting religious, cultural, and social events, takes part in the Norwich Pride March each year, supports awareness campaigns during key months such as LGBTQIA+ History Month, Black History Month, and Disability History Month, and participates annually in National Inclusion Week.

Policies, impact and representation

Equality Impact Assessments are conducted on all policies and systems, with 80 completed since 2022. The organisation has renewed its Disability Confident Level 2 status and is a signatory of the Flagship Pride and Change the Race Ratio pledges. It is also a Bronze signatory of the Armed Forces Covenant and has earned accreditation from the Domestic Abuse Housing Alliance.

Inclusive services and accessibility

A Disability Scrutiny Panel with customers was conducted between April and July 2025. The INTRAN translation service has been promoted and training provided across customer-facing business areas. In January 2025, collaboration began with the local charity Opening Doors to support the creation of 'How to Rent a Property' training for individuals with learning disabilities.

C43. How does the housing provider support the physical and mental health of its staff?

At Bromford Flagship, we believe employee wellbeing is key to our success. Supporting physical and mental health enables our people to deliver excellent services. By fostering a supportive, inclusive, and flexible environment, we empower colleagues to thrive personally and professionally.

As we move forward as a combined organisation, we remain committed to excellent working conditions, prioritising wellbeing, and evolving to ensure every colleague feels valued and inspired. Together, we can build on our strengths to deliver greater value across the group.



Bromford.

Health and wellbeing support

Bromford's wellbeing framework underpins our commitment to physical and mental health, offering occupational health support, free annual health checks, and monthly on-site physiotherapy that has reduced musculoskeletal absences. Employees can access healthy breakfasts, free fruit, a 24/7 GP service (including for immediate family), and a confidential Employee Assistance Programme, now covering bereavement and probate support. Over 50 trained Mental Health First Aiders provide guidance, while the Health and Wellbeing Passport helps record individual needs and adjustments.

Inclusive and safe workplace

Bromford offers dedicated wellbeing and menopause support, including a staff page, over 20 Menopause Champions, and accreditation as a menopause-friendly employer. Guidance covers menopause, fertility, pregnancy loss, and trauma, while stress assessments and team surveys help address workplace stress. Training for colleagues and leaders spans wellbeing, mental health, health and safety, safeguarding, resilience, and domestic abuse, providing comprehensive support across the organisation.

Work-life balance and flexibility

Bromford provides tools and guidance on pregnancy loss, trauma support, and fertility, fostering a compassionate and flexible workplace. Agile working is available for office-based roles, alongside buy/sell annual leave options. Employees also benefit from a death in service scheme equivalent to four times their annual salary.

Financial and lifestyle support

£500 flexible benefits allowance for lifestyle and health options, including discounted gym memberships and cash plans. Employees also benefit from a coffee card scheme and healthy food provision, while the Employee Assistance Programme extends support to family members, providing wider household wellbeing assistance.

Engagement and community

Health promotion and awareness are integrated into the 'Be You Road Map', featuring campaigns for Mental Health Awareness Week, Men's Health Week, menopause, and more. Regular menopause coffee mornings provide safe, supportive spaces for colleague engagement.



Health and wellbeing support

Flagship offers comprehensive wellbeing support, including a 24/7 Employee Assistance Programme for colleagues and families, and the 'Wisdom Wellbeing' app with self-help resources and EAP access. A full-time Wellbeing Coordinator and outsourced Occupational Health team provide guidance, while a menstrual health tool and Reasonable Adjustments Passport support individual needs. Staff benefit from fully funded eye tests, over 100 Mental Health First Aiders, trained Physical First Aiders, free counselling sessions, and complimentary fruit and drinks in all offices.

Inclusive and safe workplace

At Flagship, Domestic Abuse, Menopause, and Safeguarding Champions support staff wellbeing. Self-service menstrual health and stress assessments identify needs, with HR following up on reasonable adjustments. Employees receive additional paid IVF leave, and the organisation is DAHA-accredited. Manager guidance is available on the intranet, while a digital health and safety system manages risks. There are four diversity networks –Family, Disability and Neurodiversity, Gender Equity and Pride, and Social Mobility.

Work-life balance and flexibility

Flagship offers agile working for office-based roles, buy/sell annual leave options, and enhanced family-friendly policies, including maternity, paternity, shared parental, adoption leave, and paid IVF time off. Employees also benefit from a death in service scheme equivalent to three times their annual salary.

Financial and lifestyle support

Flagship provides the 'Flagship Rewards' platform with a wellbeing hub, colleague recognition, and discounts, alongside subsidised private healthcare and cash plans. Employees can access Cycle to Work, Smart Tech, and Tusker EV leasing schemes, plus the Warmer Homes Fund for boiler discounts and short-term loans. Attendance to monthly financial wellbeing webinars is offered.

Engagement and community

Flagship supports local communities through volunteering and offers a wellbeing calendar with challenges and educational resources. An internal podcast covers men's mental health, International Women's Day, Time to Talk Day, menopause, and sustainability. The organisation has signed the Armed Forces Covenant and maintains a dedicated Armed Forces Network.



C44. How does the housing provider support the professional development of its staff?

To meet Bromford Flagship's purpose of enabling people to thrive, we are committed to creating environments where colleagues are supported to grow and progress in their roles. While each organisation has taken its own approach, there is a shared belief that investing in people through skills, confidence and leadership development, is key to delivering better outcomes for our colleagues, customers and communities.



Bromford.

Structured career pathways and talent management

Bromford supports internal career pathways through a Careers Portal, Career Map, and Competency Frameworks. High-potential colleagues are identified via a nine-box talent grid and six-monthly succession reviews, helping minimise skill gaps and promote high performance. An annual Career Development Programme also provides guidance on career planning and interview skills.

Apprenticeships

Bromford offers apprenticeships in housing, business administration, and trades as a key workforce development tool. As a Silver Award member of the 5% Club, it is committed to earn-and-learn opportunities and inclusive recruitment to grow diverse talent pipelines. The graduate scheme provides a structured two-year training programme across various business areas, running annually.

Learning and development resources

There are extensive internal learning and development resources for role-specific pathways and personal growth, including resilience, unconscious bias, and mental health first aid training. The Learning

Management System (LMS) provides 450 bite-sized modules covering coaching, health and safety, innovation, soft skills, project management, safeguarding, and leadership

Leadership and management programmes

Leadership development is a priority at Bromford, supporting place-based strategies and future readiness. The Essential Leadership Academy inducts new and existing leaders, covering 10 foundational topics, plus a senior module on Leading the Business. Insights Discovery aids leadership and team development, while the annual 10-month Leading Self Programme helps colleagues prepare for career growth, whether into leadership, senior roles, or lateral moves to broaden skills and experience.



Coaching and mentoring

Bromford supports internal growth and leadership development through coaching linked to the talent matrix and performance plans. The Female Career Accelerator Programme provides mentoring for female-identifying colleagues, with 53 participants to date.

Professional qualifications and memberships

Bromford actively supports professional qualifications aligned with skill gaps and future workforce needs, providing fully paid membership to relevant professional bodies such as CIH, CIPFA, CIOB, and CIPD.

Digital and data skills

Internal development includes digital learning, with one-to-one support from a Systems Trainer. The LMS offers courses on Office 365, AI, big data, and agile and Scrum principles.

Recognition and evaluation

Bromford views ongoing professional development as key to retaining a skilled and motivated workforce, with impact tracked internally. Course completions on the Learning Management System are tracked and reported monthly.

Structured career pathways and talent management

The nine-box talent grid identifies high-potential staff, addresses skills gaps, and informs personalised development plans. A 'menu' of development options, shadowing and secondments supports progression and cross-business experience. About a third of roles each year are filled internally.

Apprenticeships

Flagship runs a nationally and regionally recognised apprenticeship programme, awarded Apprenticeships Norfolk Large Employer of the Year 2025. With a 76.6% completion rate – 16.1% above the national average – 87 apprentices are training towards level 2-4 qualifications in trade, gas engineering, leadership and management and electrical.

Learning and development resources

Flagship's Learning Management System offers 100+ modules on health and safety, digital skills, and customer care. 'Lunch and Learn' sessions covers topics such as neurodiversity, menopause, and ESG, while accredited training and the Trade Plus Programmes develop a multi-skilled workforce.

Leadership and management programmes

Our tiered approach to leadership development provides modules designed to support with leading in the present and creating the future. The five-day Leadership Development Programme (LDP) equips managers with tools to recruit, support and retain talent, taking them through all key stages of the employee journey.

Coaching and mentoring

All colleagues have access to our internal coaching and mentor networks, which provide opportunities for personal and professional development.



76.6%
apprenticeship
completion rate

Professional qualifications and memberships

Flagship supports colleagues with paid memberships to professional bodies such as CIH, CIPFA, CIOB, IEMA, and IOSH, and professional qualifications such as ACCA, CIH, CIMA, and CIPD.

Digital and data skills

New colleagues undertake a digital skills assessment to identify targeted support during induction. Flagship also offer self-serve learning opportunities available for digital skills including Office 365 and AI, whilst one-to-one digital support available from a dedicated digital skills advisor.

Recognition and evaluation

Flagship's LMS tracks course completions monthly, and talent management metrics are reviewed by the Executive team annually.

Looking ahead

As Bromford Flagship move forward as a combined organisation, we have a valuable opportunity to assess, align and strengthen our approach to learning and development to bring out the best of our colleagues. By embedding ESG principles into our learning culture, we can support green skills and innovation, inclusive leadership, equal opportunities and community impact.

Growing our Academy offer will play a key role in providing a consistent platform for personal and professional development and ensuring our people are driving the change we want to see across our organisation and the sector.



T12: Supply chain management

Procures responsibly

C45–C46. How are social value and sustainability considered when procuring goods and services? What measures are in place to monitor delivery and impact?

Before the merger, both legacy organisations followed Public Contracts Regulations, considering social and environmental factors in our contracts. As a combined organisation, we are now developing a coordinated, group-wide approach to procurement that is socially conscious and sustainable.

A new Social Value Framework is in development, which will align sustainable procurement with our place-based approach. This will guide us to measure social value and sustainability across our contracts and investments, and encourage collaboration with local partners, for example our current community rain garden project with Gloucestershire Wildlife Trust, funded through the Sabio contract, as a response to customer feedback for more access to nature.

We are committed to building policies, tools, and partnerships that will help us embed social value and sustainability into our contract lifecycle, with a purpose-driven model that creates long-term value for people, place, and planet.

Social value

The framework will be underpinned by a Social Value Engine – a consistent and robust methodology for assessing community outcomes. We are also embedding social value into our procurement processes by

- ✓ setting clear expectations at the procurement stage,
- ✓ applying standardised award criteria and KPIs for priority contracts,
- ✓ strengthening contract management processes, informed by our 2024 Supplier Contract Management Policy,
- ✓ using pre-procurement engagement to influence supplier offers and build shared understanding,
- ✓ developing strategic supplier partnerships to co-create value over the contract lifecycle.

Sustainability

Our approach to sustainability in procurement is also evolving and aligns with our broader sustainability strategy. We are embedding environmental criteria and expectations across our procurement processes, including:

- ✓ considering lifecycle carbon, waste impacts, and resource efficiency,
- ✓ prioritising circular economy principles and materials with lower environmental impact,
- ✓ ensuring compliance with environmental legislation and recognised best practice,
- ✓ aligning with the Procurement Act 2023, including its focus on social value, transparency, and local delivery.

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