

Communication on Progress

Article 13 Ltd.

2011



SUSTAINABILITY

Promoting It, Living It

Article 13's Commitment to

The United Nations Global Compact

UNGC Communication on Progress 2011

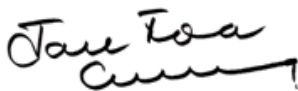
Statement of commitment

A year has passed and I, as Director of Article 13, and all my colleagues are happy to publish our eighth *Communication on Progress* (CoP) report. Since our signature to the ten principles of the United National Global Compact, in 2004, we have never forgotten that our commitment is an ongoing process which requires involvement from every member of our organisation, continual reflection and incremental steps towards improvement.

Thus I, as well as the whole Article 13 team, continue to strive to ensure that we respect and promote the UNGC principles within our own internal structures. Furthermore, as our major level of action in promoting sustainable development is through our everyday business activities, we are also dedicated to integrating the UNGC principles as key elements in our wider research, advocacy and consultancy work in sustainability and corporate responsibility around the world.

Indeed, as promoting sustainable development and responsibility is at the heart of our business, Article 13 is committed to continuing to lead and to build a social legitimacy within a range of organisations and markets. We see international law, principles and standards – such as the UNGC – as keys to ensure continual improvement and to enable innovation towards a truly sustainable society, which we all have the duty to measure and report on. Thus, we believe that participating in the UNGC and spreading its values is helpful to our business and our society, both now and into the future.

Our CoP this year provides an overview of what we have done versus our commitments in 2011. In addition, we have reviewed what we have learned this year and identified improvements that we can make for our 2012 plan. Our strategy continues, from our baseline in 2010, to focus on the UNGC areas of Human Rights, Labour, Environment and Anti-corruption.



Jane Fiona Cumming
Director
Article 13



ARTICLE 13 – PROFILE

Article 13 is a UK-based global consultancy specialising in business responsibility across all sectors but typically in the areas of CSR (Corporate Social Responsibility), sustainable development, materiality, stakeholder engagement, communications, governance, and behaviour change through social marketing.

Our company name was taken from the [13th Article of the Convention on Biological Diversity, Rio Earth Summit](#) (1992). Article 13 of the convention was concerned with education and awareness of biodiversity issues¹. As such, we are dedicated to assisting companies in planning and implementing CSR and sustainability policy and encouraging the development of actions that make a positive impact on society. We have a distinguished record in the area of Sustainability, where we have applied the formidable experience of our directors and associates to the issues facing companies in environmentally –and socially– sensitive sectors. Unusually, perhaps, we combine a strong ethical motivation with hard-headed commercial realism. At Article 13, we bring together the best minds in academia and industry, then add a special expertise in training and top-level mentoring, and a sophisticated creative polish derived from the world of marketing communications. The result is a uniquely-comprehensive package of competencies that achieves a permanent and positive change on every front and throughout every level of an organisation.

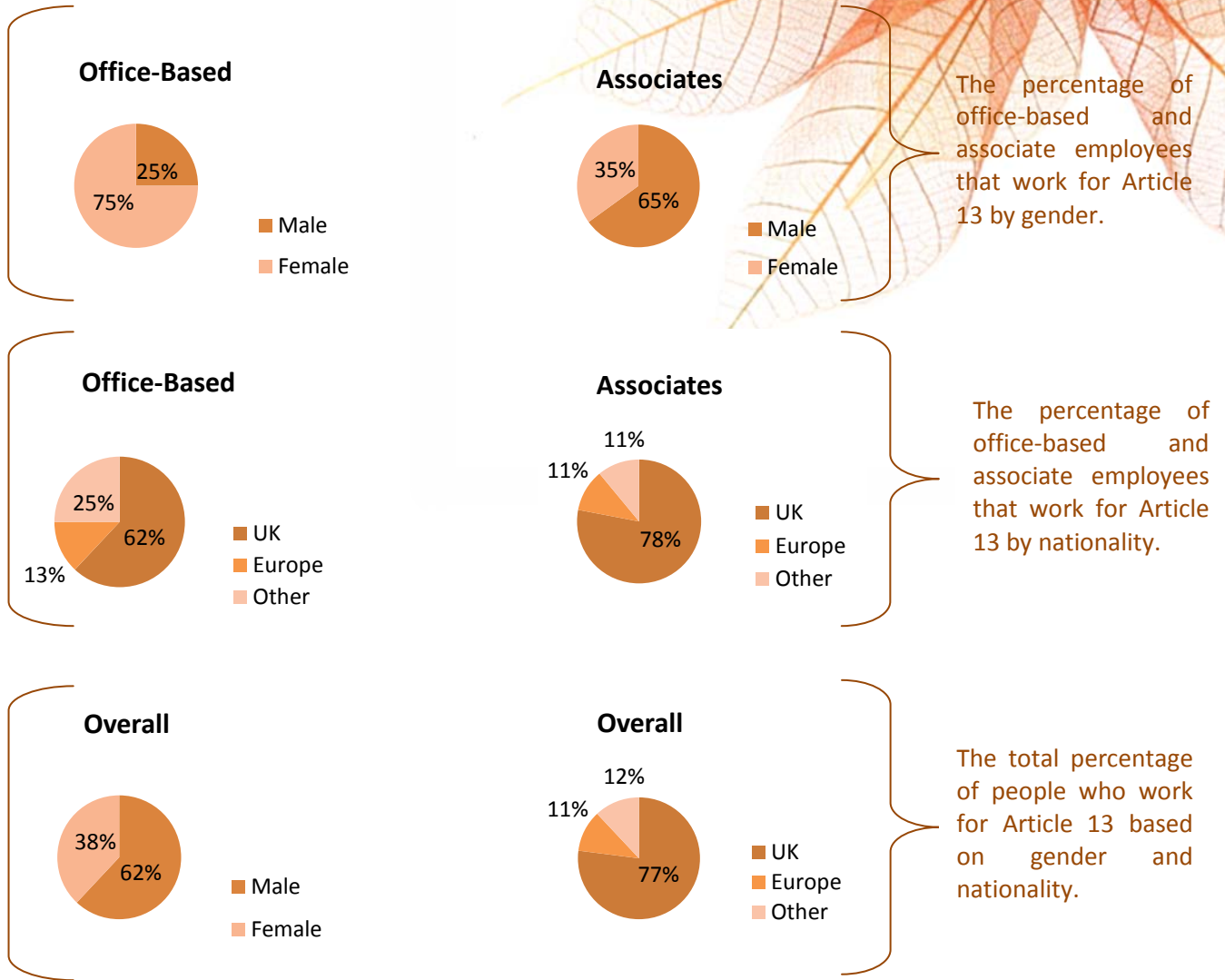
We are not in the business of ‘spin,’ of papering over cracks, of projecting an acceptable image over a dubious reality. Rather, we’re concerned with achieving real and measurable change in our clients’ attitude and behaviour; to ‘refit’ corporations and government bodies to meet the demands of a rapidly-evolving landscape. Our goal is to enable organisations to adapt for the future by adopting a more sustainable approach across the spectrum of their activities and by building relationships based on trust with all of their stakeholders.

Our own in-house commitments to professional and personal development are a reflection of this. United Nations Global Compact (UNGC) issues (Human Rights, Labour, Environment and Transparency and Anti-Corruption) and our own values are deeply ingrained throughout Article 13’s strategy. As responsible business experts, we pride ourselves on continuously improving our efforts to uphold these corporate citizenship values and advocate the business case both to, and through, our stakeholders.

We are made up of a dedicated team of professionals and a network of global experts who have worked at senior levels nationally and internationally in the CSR, sustainable development, governance and communications arenas. Our expertise enables our clients to address CSR, sustainability and governance challenges, identify future risk, and embed

¹ <http://www.cbd.int/convention/articles/?a=cbd-13>

responsible practices in mainstream business strategy. At Article 13, we maintain a small, permanent, office-based staff and collaborate, as required, with global experts on specific projects throughout the year. Diversity, in terms of nationality and gender, is reflected in both groups.



GOVERNANCE, COMMITMENTS AND ENGAGEMENT

Our commitment to the [United Nations Global Compact \(UNGC\)](#) is integrated throughout the organisation, including strategic planning and implementation at the executive level. A dedicated team member is in charge of planning, tracking, reporting and monitoring our activities and reporting to the Board on a monthly basis.

We have issued various public policies. Our Sustainability Policy contains general guidelines about how the company implements sustainable development in the business. To demonstrate active leadership and inspire others to do the same, we review, update and communicate our policies on an annual basis to ensure company compliance, to raise awareness, and to identify new ways to support and respect the protection of human rights, labour, the environment and ethical business practices.

Every year, our Communication on Progress (CoP) is made publicly available on www.unglobalcompact.org and www.article13.com. As part of this process, we commit to share the CoP with our employees, board members, clients, suppliers, associates and other members of the Article 13 network as appropriate. This is done through our internal electronic communication channels and, externally, through our regular [eNewsletter](#). Interested stakeholders are also informed via PowerPoint presentations delivered in face-to-face meetings, workshops and training programmes.

MATERIALITY²

In terms of our permanent headcount, Article 13 is a small business. However, our operations extend globally and, reflecting the nature of our business, we seek to set an example and a precedent for our clients and other stakeholders across all aspects of the sustainability agenda. As such, determining which issues to address – assessing the materiality of all the issues we could address – is a critical process for us.

Risks:

As our business activity steadily grows each year -through increased staff, increased travel and general expansion, the potential for increasing our carbon footprint also grows and more care -and creativity, must be employed to ensure that we, as individuals and as a company, not just maintain our small carbon footprint but find ways of reducing it.

Because of the international reach of our operations, there is a relatively high level of travelling linked directly to our core business. We have, therefore, sought to meet the challenge of limiting our CO₂ emissions whilst still ensuring our business success.

As an evidence-based research company, we also have to consider the day-to-day materials consumed in our offices. We closely monitor the amount of paper we use (and re-use), we are careful to use recycled materials both internally and with our clients and we actively seek to purchase only local, environmentally-friendly, ethically-sourced products. We are also, however, aware of the need for continuous improvement.

2

<http://www.globalreporting.org/ReportingFramework/G3Online/DefiningReportContent/LowerBlock/Materiality.htm>

As would be expected, we are also ever-vigilant in preventing discrimination within our company, seeking to protect human and labour rights in all areas.

Opportunities:

Advocating the integration of CSR, Sustainability (and UNGC) principles into the core strategies of clients

Participating in the building of a responsible business culture

HUMAN RIGHTS

Based in the UK, where such issues are consistently regulated, and with only a limited number of employees and suppliers to monitor, Our direct involvement in human rights concerns is relatively small. However, advocating and promoting respect for human rights has, and will continue to remain, a key issue for us. Through internal activities and policies engaging our employees and associates through to discussion and implementation of increased human rights advocacy with our clients around the world, we continuously strive to better ourselves and those with whom we work to ensure that we are both maintaining and promoting the importance of human rights. In 2011, we have been particularly active in this endeavour and have focused much effort on new initiatives in this area.

The ways in which we continue to advocate human rights include:

- Disseminating good practice via our case studies which form a key part of our website
- Monitoring our new and existing suppliers through dialogue, surveys

and policy implementation to ensure they respect human rights

- Managing the promotion and respect of human rights within our workforce (see page 6 of the CoP)
- Advocating and supporting personal commitments to human rights (page 17 of this CoP)
- Providing information regarding the UNGC, including its promotion of human rights, to our contacts and potential clients.

The Directors of Article 13 are responsible for incorporating the promotion and implementation of human rights issues in the company's strategy and activities.

LABOUR

At Article 13, we strive to maintain an open and equitable working environment that encourages inclusion and innovation. We operate a transparent Human Resources system with built-in accountabilities for staff and management. All staff are given a full induction that involves training and development, health and safety, environmental practice and employee conditions. We also operate a regular review and assessment for each employee supported by in-house coaching conducted on a weekly basis by one of the directors or the individual's line manager. Staff are actively encouraged to participate in decision making and regularly given the opportunity to contribute to the development of company strategy.

We also operate a transparent and accountable labour practices management system, building and reviewing specific

policies to ensure, where possible, we are not complicit in any forced or compulsory labour practices.

ENVIRONMENT

We continue to be committed to high environmental standards by living, working and promoting Sustainability in our own activities as well as in those with whom we work. We continue to fight, proactively, against global climate change by reducing the carbon footprint of our own business activities and advocating the same for those of our suppliers. In 2011, we continued to advocate and utilise green technologies and materials in our everyday business practice - including renewable energy - and regularly communicate our successes, as well as plans for improvement, to our key stakeholders.

Our approach to meeting our environmental responsibilities combines a number of different strands:

- Advocating & supporting personal commitments to environmental protection through our new Personal Commitments programme (page 17 of this CoP).
- A formal audit of five suppliers within our supply chain to evaluate their level of environmental protection. This revealed that whilst all five met our minimum environmental standards, some of their competitors went further. As a direct result, we switched suppliers where appropriate.

- Continuous informal monitoring of our suppliers to make sure they uphold reasonable minimum standards of environmental protection.
- Monthly tracking of paper use for A13 office (see page 16 of this CoP).
- Distribution of a monthly internal newsletter to disseminate tracking results.
- Recycling / reuse of paper.
- Using reusable grocery bags.

ANTI-CORRUPTION & TRANSPARENCY

We aim to work against corruption and promote transparency in our relationships with our employees and clients as well as through our core consultancy services, disseminating best practice directly to our clients. For us, transparency is directly linked to communication. Internally and externally, we always make sure that information we disseminate is clear and continuously updated.

Our website and newsletter are the two main communication vehicles used to inform our stakeholders and increase their awareness.

As described above, we operate a transparent Human Resources system with built-in accountabilities for staff and management. And our public integrity policy confirms our commitment to acting against corruption in all areas of our activity.

COMMUNICATION & ADVOCACY

OUR ACTIVITIES IN 2010	OUR TARGETS FOR 2011	PROJECTS / ACTIVITIES PLANNED FOR 2011	HOW WE MET OUR TARGET	UNGC Principle Met				HOW WE WENT BEYOND MEETING OUR TARGET	PROJECTS AND ACTIVITIES FOR 2012
				Human Rights	Labour	Environment	Transparency & Anti-Corruption		
<ul style="list-style-type: none"> Peer Review internal communication process Communication of the CoP Friday Night Club Website : CSR Initiative Case Studies Website : Client Case studies Website: Features Website: Glossary Website: Article 13's Press Conferences Masterclasses Communication on Article 13 policies Monthly eNewsletters 	Target 1 Increase awareness of our internal and external stakeholders	Training/coaching activities with clients related to UNGC issues	<ul style="list-style-type: none"> Best practice recommendations (client work) Minimum compliance (client work) CSR reporting (client work) Masterclasses (client work) Forum for student voice Model for engagement based on AA1000 (accountability) to encourage transparency (client work) Recommendation of GRI to at least 6 companies 	●	●	●	●	<ul style="list-style-type: none"> eNewsletter sent to 3,296 people monthly Materiality & Innovation Case studies written and published (adidas / Michelin) Olympics 2012 case studies researched and published (Rio Tinto/EDF/GSK) UNGC internal monthly newsletter sent to employees Regular UNGC meetings between board/employees 	<ul style="list-style-type: none"> Improve communication and reporting on personal commitments Increase information and interactivity for UNGC monthly newsletter Maintain peer review programme Create a new newsletter for associates Invite associates to select Friday night club Continue dialogue with new and potential clients regarding UNGC, our role in it and ways they can participate.
		One company (client or other stakeholder) to join UNGC	Speaking with various stakeholders regarding the UNGC and our commitment to it.	●	●	●	●		
	Target 2 Monitor impact of supply chain towards target of zero negative impact	Research on our suppliers & business partners (including publication on website & social media)	<ul style="list-style-type: none"> Research conducted on 3 current suppliers; 2-3 alternatives for each researched and considered Results to be published online in November and December, 2011 	●	●	●	●	Provided training and advisory services regarding sustainable supply chain procurement for a client in the food industry.	<ul style="list-style-type: none"> Research two additional suppliers and publish results Send questionnaire to 10 main suppliers & actively seek responses Receive completed questionnaire with every new supplier Continue dialogue with suppliers about UNGC
		Questionnaire for new & renewed contracts	Questionnaire developed for new and existing suppliers	●	●	●	●		
		Compare new / renewed contracts with three competitors	Compared with 2 or 3 as appropriate and available.	●	●	●	●		

CASE STUDIES:

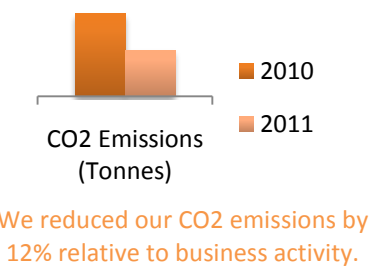
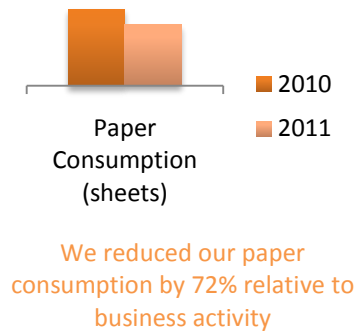
This year, we wrote case studies on the following companies. You can read them (and others) online at: www.article13.com



BEHAVIOUR CHANGE

OUR ACTIVITIES IN 2010	OUR TARGETS FOR 2011	PROJECTS / ACTIVITIES PLANnED FOR 2011	HOW WE MET OUR TARGET	UNGC Principle Met				HOW WE WENT BEYOND MEETING OUR TARGET	PROJECTS AND ACTIVITIES FOR 2012
				Human Rights	Labour	Environment	Transparency & Anti-Corruption		
• Office environmental initiatives	Target 3 Zero negative impact of Article 13 on labour or human rights	Partnership with a NGO to disseminate their activities in Article 13's network	In progress	●	●			<ul style="list-style-type: none"> Creation of an active network of trade union members with one of our clients Direct involvement of our clients' key stakeholders in development projects Continued training with our clients around corporate responsibility and development Successful engagement with workplace organisations Adoption by client union of a bargaining model that includes Corporate Social Responsibility (CSR) 	Develop an NGO partnership
		Event sponsorship	Climbing of Mt. Kilimanjaro for Camfed	●	●				
• Weekly internal communication "peer review" programme	Target 4 Commit to care about Article 13 employees and associates	Monday press	6 meetings held		●		●	<ul style="list-style-type: none"> Weekly Friday Night Club 	Continue to hold weekly Friday Night Club.
		Intern meeting	50 meetings held		●		●		
		Monthly international lunches	6 lunches held		●				
		Well-being every 6 months	<ul style="list-style-type: none"> Kew Gardens Concert and picnic Christmas lunch 		●	●			
• Internal Weekly meeting	Target 5 Minimal Co2 consumption in proportion to Article 13's business activity	Co2 consumption monitoring & dissemination of results monthly	<ul style="list-style-type: none"> Monthly report sent to employees Reduction of carbon footprint by 12% (relative to business activity) 			●	●	<ul style="list-style-type: none"> Appointment of one member of the team to be dedicated to reporting and communication Reduction of paper usage by 72% (relative to business activity). 	<ul style="list-style-type: none"> Reduce Co2 usage by additional 10% Measure water consumption
• Staff handbook		Printing reduction - track changes	Active use of 'track changes' feature for internal documents			●			
• Employees regular training		Printing reduction - printing rules documents	Printing rules document communicated to employees			●			
	Target 6 Employee personal commitments	One or two commitments per employee	Personal commitments made and started by every employee	●	●	●	●	<ul style="list-style-type: none"> Reduction of fuel for inter-office travel by 8.4% Volunteering to teach English as a foreign language Purchase of reusable grocery bags for office purchases. 	<ul style="list-style-type: none"> Development of a system to make personal commitments more accountable

Some of our Key Accomplishments This Year:



£2,700.00

Amount raised by a member of our team through sponsorship and GiftAid when he climbed Mt.

COMPLIANCE & BEYOND

Our ACTIVITIES IN 2010	OUR TARGETS FOR 2011	PROJECTS / ACTIVITIES PLANnED FOR 2011	HOW WE MET OUR TARGET	UNGC Principle APPLIED				HOW WE WENT BEYOND meeting OUR TARGET	PROJECTS and activities FOR 2012
				Human Rights	Labour	Environment	Transparency & Anti-Corruption		
<ul style="list-style-type: none"> • Nine Article 13 policies with international law references • Global Compact commitment • ISO 9001:2008 • Investors in People • Promotion of GRI to clients 	Target 7 Increase awareness of our internal and external stakeholders	Undertake an audit of regulations pertinent to Article 13's policies	<ul style="list-style-type: none"> • Annual internal policy audit in November 2011 	●	●	●	●	<ul style="list-style-type: none"> • Appointment of new Health & Safety Warden including first aid and fire marshal training • Open dialogue policy 	<ul style="list-style-type: none"> • Continue to undertake annual audits of internal policies • Write a formal open dialogue policy and disseminate to all employees • CoP to follow the UNGC Advanced criteria (linked to GRI) • Continue to implement Investors in People standards despite discontinuation of external audit • Continue to maintain ISO 9001:2008 standards, including annual external audit
		Continue to implement & go beyond ISO & IIP requirements	<ul style="list-style-type: none"> • Annual ISO audit in November 2011 • Health and Safety inductions for new staff and office visitors 	●	●	●	●		
		Update & communicate Article 13's policies annually	<ul style="list-style-type: none"> • Disseminated annually (in December) internally and posted to website 	●	●	●	●		

Policies:

All of our policies are in the Appendix of this report.

- Client Engagement
- Environment
- Fair Commercial Terms
- Health & Safety
- Integrity
- Quality
- Staff Development & Equal Opportunity
- Supply Chain
- Sustainability
- Training & Development

You can also read our external policies online at

www.article13.com

How Do We Use the UNGC Principles Every Day?

Communication & Advocacy

Article 13's communication and advocacy strategy encompasses our efforts taken to increase awareness of internal and external stakeholders through our company activities, including coaching and training for business sustainability.

Our Peer Review Programme encourages every employee to share their work and receive feedback from colleagues, allowing us to continuously improve our work as well as encourages transparency.

Our annual Communication on Progress report is published on www.article13.com and shared with Article 13's employees, board members, clients, suppliers, associate and other stakeholders.

Every Friday, all Article 13 employees are invited to leave work 30 minutes early to have an informal drink together at our Friday Night Club.

Our website regularly publishes case studies on selected initiatives that highlight CSR practices as well as *case studies* on work we do for our clients. Additionally, we publish bi-annual *features* to inform our readers on important CSR topics, offer a CSR / Sustainability *glossary* as an aid to learning, and publish our press to keep stakeholders up-to-date on our company. A monthly *eNewsletter* is also distributed to anyone who subscribes to it.

Article 13's directors regularly attend and speak at conferences around the world regarding CSR and Sustainability and we regularly organise and facilitate masterclasses on various CSR and sustainability topics.

Behaviour Change

For Article 13, CSR and UNGC principles are mainly about behaviour change. As an innovator of new ideas and proponent of sustainable change, we seek to continuously improve ourselves as a means of inspiring and setting a precedent both for those whom we work and those with whom we work. Some of the main on-going initiatives we have implemented and utilise internally are:

Office environmental initiatives

- **Energy** : The company is supplied with 100% renewable energy and always measures its consumption with a view to reducing it (monthly heating management).
- **Waste** : Each employee is encouraged to reduce waste and to use the various dedicated recycling bins.
- **Procurement** : All groceries for the office are bought fair trade, organic or locally sourced.
- **Travel** : We propose and use train travel rather than flights when possible

Internal communication and employee development

- **Peer Review Programme** : Weekly programme which encourages employees to report on their work and receive personal feedback from a director.
- **Staff handbook** : Document given to all new employees and interns explaining Article 13's internal policies.
- **Training** : All staff are given a full induction that involves training and development. We also operate a regular review and assessment for each employee supported by in-house coaching.

Compliance and Beyond

Our policies are designed to implement and promote the UNGC :

External Policies

- **Sustainability Policy** : Explicitly states our commitment to the company's stakeholders
- **Staff Diversity & Equal Opportunity Policy** : describes our commitment to fair and responsible treatment of potential and current staff.
- **Supply Chain Policy** : defines our commitment to human rights in our supply chain in accordance with UNGC principles.
- **Integrity Policy** : details our commitment to the ethical performance of the company in regards to clients, suppliers and all staff
- **Environment policy** : explains how the company aims to reduce its environmental impact

Internal Policies

- **Fair Commercial Terms Policy** : details our commitment to fair treatment of suppliers and associates
- **Client Engagement Policy** : Specifically mentions our commitment to client and client projects in relation to the UNGC
- **Training & Development Policy** : Describes our commitment to encouraging innovation by our employees
- **Health and Safety Policy** : Details our commitment to ensuring the safety of all our staff

We also subscribe to these externally-monitored standards:

- **United Nations Global Compact** : Active member since 2004
- **ISO 9001:2008** : Member since 2008
- **Investors in People** : Participant since 2005

We regularly promote similar policies and programmes (including GRI standards) to our clients.

Target 1: Increase Awareness of our Internal & External Stakeholders

We are always aiming for high quality business relationships through ethical services consultancy and transparency in communications.

HOW DID WE ACHIEVE OUR TARGET?

Specific activities attributed to our achievement of our target this year:

- Conducting sector policy, benchmarking and strategy research to advise on minimum compliance as well as recommend best practice initiatives.
- Working with a client in the energy sector to establish a strategy and reporting framework encompassing their CSR impacts, activities and communications to stakeholders; and linking this strategy to their business objectives.
- Providing independent recommendations regarding industry-specific best practice CSR initiatives, including information and guidance on national and international standards for two clients in the global food production and distribution industry.
- Aiding a global transportation client in developing a CSR communication strategy resulting in the publication of their first-ever CSR report.
- Offering specialised training to organisational clients through our **Masterclasses** in reporting standards, sustainability and CSR, transportation, packaging, sourcing, CSR strategy and supply chains.
- Attending and presenting at CSR and sustainability conferences around the world including the writing and presentation of a leading-edge position paper on human rights for a global anti-piracy conference.
- Organising and leading a forum for student voices on decisions regarding employment and involvement in their educational journey.
- Continuing to regularly advocate the adoption of AA1000, GRI and UNGC standards to many of our clients from countries and sectors around the world.

HOW DID WE GO BEYOND OUR TARGET?

Communication is key for us and so we continuously strive to increase both the ways we communicate to our internal and external stakeholders as well as improve the levels of communication that we adopt with them. This year, we feel that we have exceeded our set target in several ways:

Each month, we send out an eNewsletter to everyone who has requested to receive it (**signup** is available on our website) which details latest updates, information and other relevant CSR and sustainability news and issues. While this publication is regularly sent to nearly 5,000 people around the world, our monthly eNewsletter received an additional 479 subscribers in 2011 (as of October 15).

In July, we published a set of case studies focused on informing our online readers of best practice initiatives on materiality and innovation (see our case studies on **adidas** and **Michelin**) and in October a second series was published focused on exciting CSR work being implemented by Olympics sponsors in London (see our case studies on **EDF**, **GSK** and **Rio Tinto**). **All our case studies** are always published online and in our monthly eNewsletters.

Our October **'Expert View'** feature, published online and distributed to our eNewsletter subscribers, describes the importance of stakeholder engagement and offers insight to how it can be obtained within any organisation.

Internally, we hold regular formal and informal meetings between staff, including directors, to discuss UNGC issues and goals, our successes and ways we can improve. We also maintain a monthly newsletter to all our office-based staff to provide detailed information regarding our carbon footprint tracking and paper and electricity usage as well as any new information regarding personal commitments, important up-coming dates (including staff birthdays!) and other office news.

Target 2: Actively Monitor the Impact of Our Supply Chain

We work with suppliers for various services and are committed to ensure that these suppliers maintain the high standards we set in regards to all ten UNGC principles. Through policy and practice, we strive to manage our supply chain in a way that continuously encourages and enforces ethical and sustainable behaviour and products.

HOW DID WE ACHIEVE OUR TARGET?

One of our key initiatives this year was to conduct research on our supply chain to determine the level of environmental and social responsibility of several of our suppliers. Using publicly available information as well as personal conversations, we benchmarked five of our suppliers against 2-3 main competitors in areas of CSR, environmental sustainability and cost in order to better understand our role within the value chain. This supply chain audit proved to be an invaluable tool for our company and our team.

Although all of our suppliers are considered to be active in CSR initiatives, through our supply chain research this year, we were able to reconfirm our commitment to all ten UNGC principles within our value chain as well as to find new leaders in the field in order to continuously improve it.

Full results of our supply chain research and any switches we made as a result of it will be published on our website and social media later this year.

HOW DID WE GO BEYOND OUR TARGET?

Materiality

“Materiality is determining the relevance and significance of an issue to an organisation and its stakeholders. A material issue is an issue that will influence the decisions, actions and performance of an organisation or its stakeholders”

Definition: AA1000 - 2008.

As part of our client work this year, we provided education regarding sustainability and materiality for a client in the food industry procurement supply chain. This involved leading a workshop with procurement directors as well as external experts to identify the issues, stages, and key actions to be taken towards a more sustainable supply chain; we then advised on how to integrate this into the company's overall sustainability strategy.

Target 3: Zero Negative Impact on Human Rights

Human rights have always been a key value of Article 13 even if our activity impacts are quite low. In this area, we were particularly keen throughout 2011 to ensure that we were both maintaining and promoting the importance of a responsible and ethical business.

HOW DID WE ACHIEVE OUR TARGET?

In 2010, the team at Article 13 expressed an interest in further developing our participation in human rights. It was decided that perhaps one of the most active ways of doing so would be by partnering with a local non-governmental organisation (NGO) where we as a company, as well as individuals, could contribute to human rights in a more active, collaborative and hands-on way. Throughout 2011, research was conducted to find a local, recognised NGO that was non-political in nature and effectively promoting human rights with whom we could non-monetarily partner (using the UK Charity Commission's 'Hallmarks of an Effective Charity' standards). Through our research, a suitable NGO has been identified and there are currently on-going discussions between us to determine the best way to approach a partnership. We hope to announce an official partnership as well as our goals for it in early 2012.



Additionally, one of our employees did a sponsored climb of Mt. Kilimanjaro as a means of raising awareness and donations for Camfed, a global charity which fights poverty and HIV / AIDS in rural Africa by investing in young women's education, enterprise and leadership. Through sponsorship and GiftAid, he was able to raise £2,700.

HOW DID WE GO BEYOND OUR TARGET?

As part of our client work in 2011, we worked with a trade union to provide training for its members to better understand sustainability, CSR and specifically the Millennium Development Goals (MDGs). We also gave practical support and guidance on how this training could be taken back to and into the members' respective organisations.

What are the Millennium Development Goals?

Adopted by World leaders in the year 2000 and set to be achieved by 2015, the Millennium Development Goals provide a framework for the entire international community to work together towards a common end – making sure that human development reached everyone, everywhere. If these goals are achieved, world poverty will be cut by half, tens of millions of lives will be saved, and billions more people will have the opportunity to benefit from the global economy.

In addition, we developed a localised operational CSR strategy for a global company in the mining sector in order to understand best practice and to set, monitor and achieve global standards around human rights. As no company is able to offer work to everyone within the region, a key feature of our work with this client was the development of an appropriate approach which takes into consideration the company's boundaries of inclusion so as to ensure human rights are

Target 4: Commit to Care about Our Employees and Associates

At Article 13, we continuously strive to maintain a working environment that emphasises inclusion, innovation and community and which encourages the personal and professional development of all our employees and associates.

HOW DID WE ACHIEVE OUR TARGET?

We operate a continuous **internship programme** at Article 13 as a way of developing skills as well as inspiring new ideas and creativity among all our staff. All interns meet weekly with their manager and regularly with directors to discuss the work they are involved in, answer any queries they may have, and generally 'check-in' as a means of ensuring their comfort and integration into the office and with other members of staff. At the end of every internship, all interns also take part in an exit interview and questionnaire to discuss and communicate their internship and ways to achieve continuous improvement.

Our twice-yearly well-being events this year included a trip to Kew Gardens for an outdoor concert and picnic and Christmas dinner at a local restaurant.

Eight Monday Press mornings, or office-wide meetings among all staff, have also been conducted this year as a way to encourage and facilitate communication and collaboration. As an office-wide event, eight internationally themed office-wide lunches have also taken place this year; and we always celebrate every staff member's birthday with a card and cake.

HOW DID WE GO BEYOND OUR TARGET?

What some of our previous interns have said about their time at Article 13:

"My time at Article 13 has afforded me a different perspective of the role of business in development and environmental issues; I now appreciate to a far greater level the importance of business-led development and the role independent organisations (such as Article 13) can play."

"I have never experienced an environment that expressed such gratitude for tasks done well."

"Thanks to Article 13 I can work with experienced CSR experts, probably best in the UK. The communication inside the office is great and I feel that my actions have an impact on the company and are part of a bigger picture."

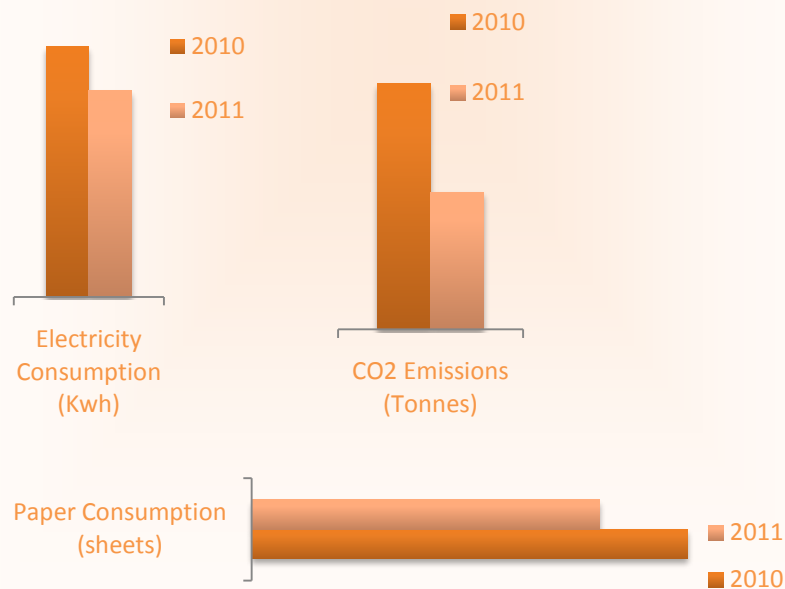
Target 5: Minimal CO₂ Consumption in Relation to Business Activity

Article 13 continues to be committed to high environmental standards in our office as well as in the activities of those with whom we work. One way we are able to do this is by continuous monitoring and implementation of initiatives to reduce our carbon footprint

HOW DID WE ACHIEVE OUR TARGET?

Through monitoring our electricity and travel, this year we have reduced our annual CO₂ emissions by 12% relative to business activity.

By encouraging more environmentally-friendly ways of travel, implementing use of the 'track changes' system in our peer review programme and printing rules communication campaign, relative to business activity we have reduced our annual paper usage by 72%



HOW DID WE GO BEYOND OUR TARGET?

Starting this year, we have one member of our team dedicated to monthly reporting and communication of Article 13's CO₂ emissions and paper consumption.

This year, in addition to reducing our carbon emissions, we also reduced the amount of electricity as well as the amount of paper we used. Next year, we aim to reduce our impact by using even less.

Target 6: Personal Commitments

One area of concentration in the UNGC and an important aspect of Article 13's commitment to it is the incorporation of the Compact's ten principles into the day-to-day activities of the business. Because every personal commitment is tailored to each member's role, routine and passions, implementing the Personal Commitment Programme has offered Article 13 a great way to enthusiastically incorporate UNGC principles into the overall business strategy as well as our day-to-day and personal routines.

HOW DID WE ACHIEVE OUR TARGET?

This year, Article 13 has implemented a "Personal Commitments" programme for all office-based staff. Although entirely voluntary, each team member at Article 13 is encouraged to make one or more achievable commitments relating directly to at least one of the ten UNGC principles. These commitments can be delivered both in and out of the office in both a work and home environment and in any area(s) which those participating feel strongly about and would like to improve. Individuals are asked to report back informally on their progress and successes on a monthly basis and this information is disseminated throughout the office in the Article 13 internal newsletter.

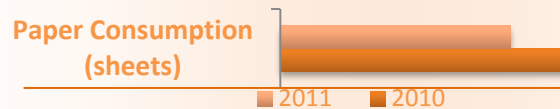
Personal Commitments this year include:

- Donating to charity
- Volunteering with an NGO
- Procurement from local retailers
- Walking / riding to work
- Reducing car use
- Maintaining more electronic copies of documents rather than printing
- Using track changes
- Using reusable shopping bags / reusable coffee cups
- Incorporating more recycling measures at home
- Explaining and promoting the UNGC to new and potential clients
- Developing clear job descriptions

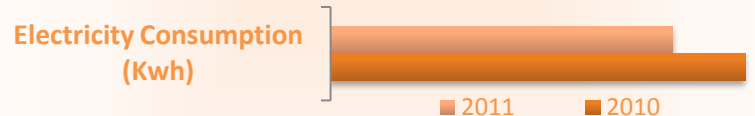
HOW DID WE GO BEYOND OUR TARGET?

There has been a great acceptance of the programme and many commitments were made by team members this year. All full- and part-time staff have voluntarily taken part and have reported continuous progress in their efforts. Additionally, in conjunction with other programmes and initiatives at Article 13, the Personal Commitments programme has helped us to reduce office paper consumption by 23% from last year and decrease our electricity use by 19% despite an increase in business activity. Article 13 staff have also increased their use of public transport for getting to and from work, cutting CO₂ emissions by 32% in 2011 relative to 2010.

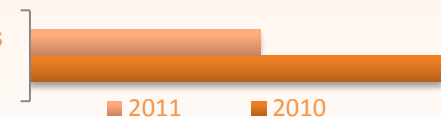
Paper Consumption (sheets)



Electricity Consumption (Kwh)



CO2 Emissions (Tonnes)



Target 7: Maintain Zero Direct Negative Impact in All UNGC Areas

Respect for laws and regulations is the first step in terms of building a responsible strategy - but we seek to go beyond that in many different ways.

HOW DID WE ACHIEVE OUR TARGET?



WE SUPPORT

This year, we will undertake an internal audit of national and international regulations that are pertinent to our activities in order to update our policies (current policies can be found in this report's appendix). We will continue to update all of our policies annually and communicate them through publication of this CoP and via our website.



We continued to implement the standards of **ISO 9001:2008** to ensure that we meet the quality requirements of our clients and stakeholders. Our accreditation in this programme was externally audited in November 2011.



INVESTOR IN PEOPLE

In 2011 we also participated in the national **Investors in People (IiP)** programme as a way to continuously improve our high management standards. Externally audited every three years, we last underwent external evaluation for IiP certification in November 2008.

HOW DID WE GO BEYOND OUR TARGET?

We have designated a health and safety coordinator responsible for the daily management of health and safety policies who has successfully completed national fire marshal and first aid training designed for the workplace.

We also have an open dialogue policy and encourage comments - both positive and negative - and suggestions regarding health and safety policy or procedures.

In 2011, no member of our office-based staff has suffered any occupational injury or disease, nor were there any lost days, absenteeism or fatalities due to occupational injury or illness in 2010.

FOR US, IT'S A MATTER OF PRINCIPLES

Upholding and promoting the 10 UNGC Principles and the Millennium Development Goals is not simply an addition to what Article 13 does. Those values are at the very heart of our business.

To ensure that Article 13 is improving its commitment, the challenge is to be able to measure, to publicly report and monitor the activities.

Appendix

Article 13 Policies



CLIENT ENGAGEMENT POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

It is the policy of the management of Article 13 Ltd to establish clear and transparent working relationships with its clients in order to manage expectations appropriately and deliver according to project requirements. Article 13 is committed to developing long term relationships with its clients.

As a responsible and connected corporate citizen, Article 13 is committed to continuous improvements in its engagement with clients. Article 13 seeks to demonstrate active leadership in its supply chain activities, and inspire clients and partners to do the same, such that human rights, labour standards and environmental laws and codes of practice will be regarded as setting the minimum standards for the Company's whole supply chain performance.

Article 13, in accordance with the ten principles of the UN Global Compact, recognises the impact of its decisions in respect of clients and client projects upon the local, regional and global community and environment. Article 13, therefore, is committed to thoroughly researching and making informed decisions about the clients it works for and the projects it works on.

Article 13 will consider at board level any decision to work with clients whose core business might be considered unethical. If a decision is taken to work with a controversial company, Article 13 would ensure that the client adheres to strict conditions.

STAFF RESPONSIBILITIES

All employees and temporary workers have a duty to:

- carry out their work with clients and on client projects with high regard to ethical standards;
- treat confidential information with due care and proper consideration of the legal and ethical ramifications.
- draw to management attention any information they come across, which may impact on Article 13's decision to work with a particular client or on a particular project.



STAFF RESPONSIBILITIES

The management of Article 13 will strive to safeguard the reputation and future sustainability of Article 13, its associates and suppliers. Article 13 will therefore decline to supply services unless the client makes a serious commitment to ensure, for its own organisation and for the suppliers it can influence, that:

- employment is freely chosen;
- freedom of association and the right to collective bargaining are respected;
- working conditions are safe and hygienic;
- child labour is not tolerated;
- reasonable living wages are paid;
- working hours are not excessive;
- except where dictated by regional law, no discrimination is practiced based on equality in hiring, compensation, access to training, promotion, termination or retirement, race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation;
- regular employment is provided;
- no harsh or inhumane treatment is allowed, including threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation;
- environmental stewardship is practiced.

In practice, Article 13 will as far as possible:

- communicate with clients regularly in an open and transparent manner, ensuring that regular progress reviews and evaluations are built into the project cycle;
- adhere to its ISO 9001 policies and procedures, including striving for 100% customer satisfaction
- recognise and make a point of reinforcing communication with any new contact person for potential and existing clients;
- avoid delivering services to a client that does not uphold or demonstrate commitment to the ten principles of the UN Global Compact (UNGC);
- avoid working with clients or on projects widely known to involve poor practices;
- review potential clients and engagements with them on ethical grounds and involve the board in final decision-making and setting of attached conditions wherever doubt is raised over a prospective client's integrity, the controversial nature of the core business or a project's sustainability.
- treat all data in accordance with the requirements of the Data Protection Act 1998



The management of Article 13 reserves the right to terminate work with a client or on a specific project if the client is:

- not seen to be serious about moving towards responsible practices or is corrupt or not working in the spirit of the UNGC principles;
- displaying aggressive, unsatisfactory or unprofessional behaviour towards Article 13 and its staff.

REVIEW

Article 13's policy for client engagement will be reviewed annually and amended as necessary.

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on client engagement as part of their induction training.

Staff views and questions relating to environmental matters are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate.

Expert advice will be obtained when required from appropriate sources/organisations.

ASSOCIATED DOCUMENTS

- Sustainability Policy
- Supply Chain Policy
- Quality Policy
- Integrity Policy
- Customer Satisfaction Objectives

RELEVANT LEGISLATION AND STANDARDS

- United Nations Global Compact Principles

Jane Fiona Cumming

article **13**

Effective 1st August 2007; reviewed August 2009, October 2010, Updated November 2011

ENVIRONMENT POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

It is the policy of the management of Article 13 Ltd to respect the environment and to reduce the Company's environmental impact.

Article 13 recognises that its operations and client projects have an effect on the local, regional and global environment. As a result, Article 13 is committed to continuous improvements in environmental performance and the prevention of pollution.

Environmental regulations, laws and codes of practice will be regarded as setting the minimum standards of environmental performance.

Article 13 seeks to demonstrate active leadership in environmental management, and inspire clients, partners and its wider networks to do the same.

STAFF RESPONSIBILITIES

All employees and temporary workers have a duty to consider the effects on the environment of their work for Article 13, both in Article 13's internal operations and through projects for clients and partners.

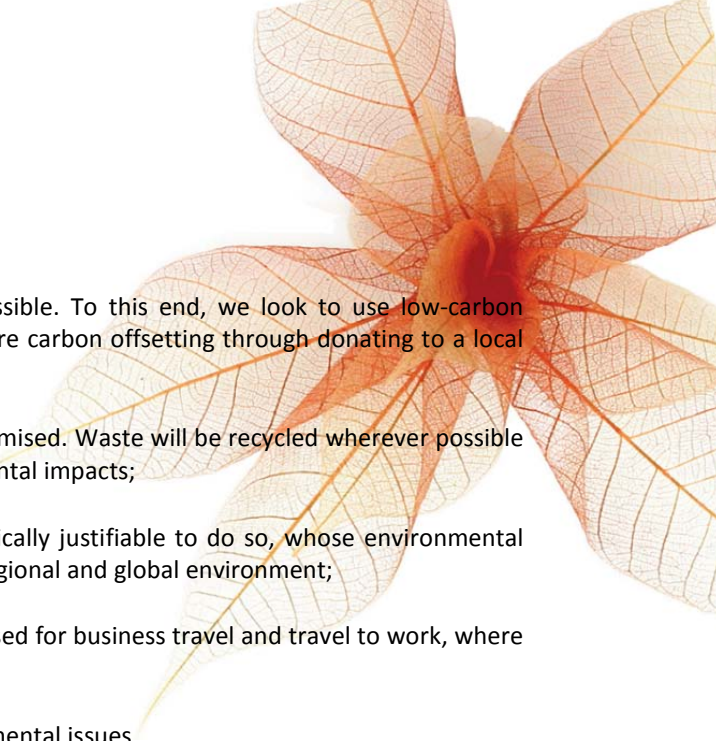
Office Environmental Guidelines may be found in the Staff Handbook.

MANAGEMENT RESPONSIBILITIES

The Directors are responsible for implementing an action plan to ensure Article 13 achieves its commitments and goals.

Article 13 aims to ensure that:

- material consumption is reduced, through efficient use and careful planning to make actions as sustainable as possible;
- energy consumption is reduced. Energy from a renewable source will be purchased and investment made in energy efficiency products where possible;

- 
- its operations are carbon neutral wherever possible. To this end, we look to use low-carbon options and where is this not possible, we explore carbon offsetting through donating to a local environmental or carbon offset project.
 - waste (particularly of a hazardous nature) is minimised. Waste will be recycled wherever possible and disposal will take account of local environmental impacts;
 - preference is given to suppliers, where economically justifiable to do so, whose environmental management reflects stewardship of the local, regional and global environment;
 - public and non-motor vehicle transportation is used for business travel and travel to work, where possible;
 - staff are consistently trained in relevant environmental issues.

The directors, in consultation with all staff, will set environmental targets based on these goals and designed to improve Article 13's environmental performance.

REVIEW

Article 13's environmental performance and policy for the environment will be reviewed annually and amended as necessary.

Article 13 carbon emissions will be monitored monthly.

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on the environment as part of their induction training.

Staff views and questions relating to environmental matters are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate.

Expert advice will be obtained when required from appropriate sources or organisations.

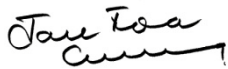
ASSOCIATED DOCUMENTS

- Sustainability Policy
- Supply Chain Policy
- Staff Handbook
- Annual UNGC Environment Targets
- Annual UNGC Action Plan
- Carbon Offsetting Statement (Client and Associate Contracts)

- Stationery and Paper Consumption forms
- Suppliers List

RELEVANT LEGISLATION AND STANDARDS

- United Nations Global Compact Principles



Jane Fiona Cumming

article **13**

FAIR COMMERCIAL TERMS POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

It is the policy of the management of Article 13 Ltd to treat suppliers (including Associates) fairly.

STAFF RESPONSIBILITIES

All employees and temporary workers are required to support the implementation of this policy.

Staff are expected to:

- treat confidential information with due care and proper consideration of the legal and ethical ramifications;
- promote positive supplier relationships through courtesy and impartiality.

MANAGEMENT RESPONSIBILITIES

The directors are responsible for ensuring that Article 13:

- specifies its requirements carefully and in advance of agreeing a contract with suppliers;
- selects its suppliers on the basis of fair competition;
- makes timely payments in accordance with the terms agreed at the time of the contract, subject to satisfactory compliance with the stated contract;
- does not terminate purchase or supply arrangements without due regard for the consequences and appropriate communication and notification.
- produces and provides written Terms and Conditions information for appropriate suppliers.

Review

Article 13's policy for fair commercial terms will be reviewed annually and amended as necessary.

Effective 1st August 2007; reviewed October 2010, Updated November 2011



COMMUNICATIONS

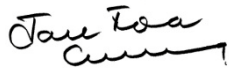
A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on fair commercial terms as part of their induction training.

Staff views and questions relating to Fair Commercial Terms issues are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate.

Expert advice will be obtained when required from appropriate sources/organisations.

ASSOCIATED DOCUMENTS

- Sustainability Policy
- Associates Procedures
- Associates Contract and Letter templates
- Quality Policy
- Suppliers List



Jane Fiona Cumming

article  13

HEALTH & SAFETY POLICY

ARTICLE 13 LTD



article 13

COMMITMENTS

It is the policy of the management of Article 13 Ltd to do all that is reasonably practicable to ensure a safe and healthy working environment.

The promotion of health and safety measures is regarded as a mutually beneficial objective for management and employees at all levels. The avoidance of hazards arising from the Company's operational activities, services or products is of paramount importance.

Article 13 will provide appropriate instruction, training, supervision and information to enable all employees to perform their work safely and efficiently. Training will be provided to employees to ensure that they are aware of their duties and responsibilities and that health and safety is a prime consideration in all aspects of their work and the work of contractors, customers and visitors on Company premises.

Article 13 will emphasise in all health and safety matters the high degree of individual personal responsibility that must be accepted by each employee.

STAFF RESPONSIBILITIES

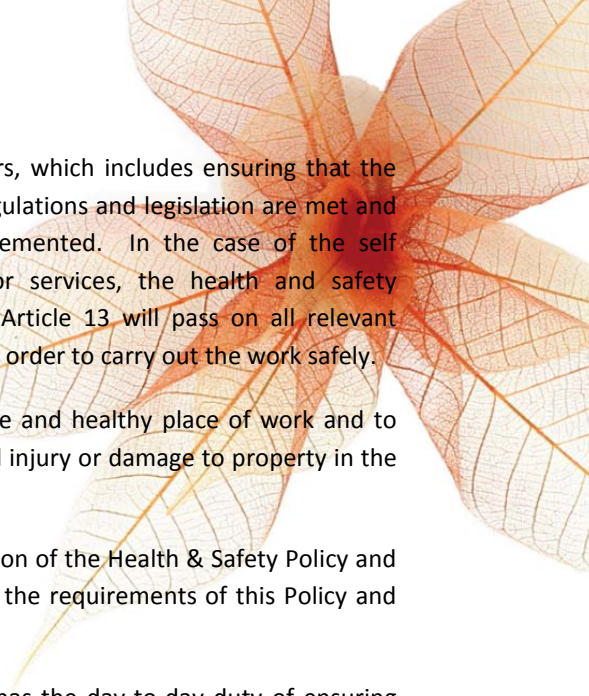
All employees and temporary workers have a duty to co-operate with management by:

- working safely and efficiently, taking all reasonable steps to safeguard their safety and that of any other person who may be affected by their actions;
- using protective equipment provided and meeting statutory obligations;
- reporting accidents/incidents that have or could have caused injury or damage;
- adhering to Article 13's Health & Safety policy and procedures for securing a safe place of work;
- assisting in the investigation of accidents with the objective of introducing measures for preventing recurrence;
- identifying potential hazards and reporting them for corrective action.

Neglect of health and safety requirements will be regarded as a serious disciplinary matter.

MANAGEMENT RESPONSIBILITIES

Effective 1st August 2007; reviewed October 2010, Updated November 2011



The Directors are responsible for all applicable health and safety matters, which includes ensuring that the provisions of the Health & Safety at Work Act 1974 and all associated regulations and legislation are met and that Article 13's organisation, arrangements and procedures are implemented. In the case of the self employed and/or temporary workers, operating under a contract for services, the health and safety responsibilities are shared between the worker and client employer. Article 13 will pass on all relevant information on any qualifications and skills the temporary worker needs in order to carry out the work safely.

It is the duty of all management and supervisory staff to maintain a safe and healthy place of work and to ensure that everything reasonably practicable is done to prevent personal injury or damage to property in the process of its activities.

Jane Fiona Cumming, Director, is responsible for the overall implementation of the Health & Safety Policy and shall arrange for funds and appropriate facilities to be available to meet the requirements of this Policy and Health & Safety Procedures.

Lacey Ward, Office Manager and overall Health & Safety Co-ordinator, has the day-to-day duty of ensuring compliance of this Policy and Health & Safety Procedures.

Review

Article 13's policy for health & safety will be reviewed annually and amended as necessary.

Audits of health & safety procedures and inspections of the workplaces will be carried out at least annually by management and relevant staff. Any health and safety items logged during the course of audit inspections will be referred to the Directors for allocating action.

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on health & safety as part of their induction training.


Staff views and questions relating to health and safety matters are actively encouraged and should be raised with their employee representative, Office Manager or Directors as appropriate.

Expert advice will be obtained when required from appropriate sources/organisations.

ASSOCIATED DOCUMENTS

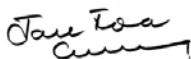
- Sustainability Policy
- General Health & Safety Procedures
- Specific Health & Safety Procedures/Working Practices
- Employer's Liability Insurance Certificate
- Staff Handbook
- Emergency Procedures/Business Continuity Plan
- Health & Safety Audit and Review Log

Effective 1st August 2007; reviewed October 2010, Updated November 2011

- 
- Annual Health & Safety Audit Checklist
 - Annual Fire Safety Audit Checklist
 - Fire Equipment Servicing
 - Risk Assessment Forms
 - Contract of Employment/Company Rules
 - Employee Checklist (Health & Safety Induction)
 - Display Screen Equipment Assessment Form
 - Manual Handling Assessment Forms
 - Personal Protective Equipment Training Record
 - Control of Substances Hazardous to Health (CoSHH) Register / Risk Assessments / Safety Data Sheets
 - Accident Book and Reports
 - Maintenance Logs/Certificates
 - Portable Appliance Testing Register

RELEVANT LEGISLATION AND STANDARDS

- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999 (risk assessment)
- Health and Safety (Consultation with Employees) Regulations 1996
- Safety Representatives and Safety Committees Regulations 1977
- Regulatory Reform (Fire Safety Order) 2005
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (1995) (RIDDOR)
- Offices, Shops and Railway Premises Act 1963
- Control of noise at Work Regulations 2005
- Health & Safety (Display Screen Equipment) Regulations 1992
- Manual Handling Operations Regulations 1992



Jane Fiona Cumming

INTEGRITY POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

Article 13 Ltd believes that integrity is central to the ethical performance of its business in all its dealings with clients, suppliers (including associates) and staff.

For Article 13 integrity means that it seeks to:

- manage its own activities so that organisations working with Article 13 can be confident that it meets the ethical supply chain standards set by itself for others;
- work against corruption in all its forms, including extortion and bribery, in accordance with the tenth principle of the United Nations Global Compact.

Article 13 will work against corruption, bribery and extortion defined as follows:

1. *Corruption*: the misuse of entrusted power for private gain.
2. *Bribery*: a form of corruption: the promise, offer, or gift of something of value, especially money, to a person to gain influence or to procure goods, services or other reward beyond what has been legally contracted;
3. *Extortion*: the threat of injury to a person or their property or reputation in order to obtain something of value from them or to induce them to undertake, or not undertake, an action;

STAFF RESPONSIBILITIES

The cooperation of all employees is essential for the success of this policy.

If any employee considers that unethical decisions are being made, they should:

1. raise the complaint with a director verbally;
2. if this is not appropriate or the issues are not resolved, then employees may speak to a non-executive director directly.



MANAGEMENT RESPONSIBILITIES

The Directors are responsible for implementing the Integrity Policy and acting in compliance with all applicable national and international laws and regulations.

Neither Article 13 nor its employees, in the course of their duties for Article 13, shall:

- solicit, or accept money, loans or credit from clients or suppliers, except as provided for by client or supplier contracts;
- accept gifts, entertainment, favours or services from present or potential suppliers which may appear to diminish the objectivity of Article 13's decision-making process.

To ensure that transparency is maintained in reference to our finances, the following process will be followed:

1. Incoming invoices and expenses claims are checked by the Financial Controller. They are then passed to the company directors for approval and are signed by them as confirmation of this approval;
2. Approved invoices and expenses are passed back to the Financial Controller for entering onto the Sage accounting system;
3. At the appropriate time, based on terms of business, invoices and expenses are paid by BACS by the Financial Controller;
4. All paperwork is filed by the Financial Controller and kept securely for seven years after the end of the financial year;
5. At the end of each financial year, the accounts are audited by the company accountants, Diverset Ltd, who ensure that all financial dealings within the past year are in accordance with legislation and ethical practices.

It has become common business practice to purchase food and beverages for business meetings. Beyond this, Article 13 will not accept or make contributions in the form of money, gifts or any other means that may be deemed as a bribe.

Under no circumstances will Article 13 or any of its directors or staff members attempt to extort anything from anyone, be they a client, supplier (including associates) or a staff member.

Article 13 shall not misuse its power or position in any way, shape or form for private gain.

REVIEW

The Integrity Policy will be reviewed annually to determine the need for alteration and revision.

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on integrity as part of their induction training.

Staff views and questions relating to integrity are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate.

Expert advice will be obtained when required from appropriate sources/organisations.

Effective 1st August 2007; reviewed August 2009, October 2010, Updated November 2011

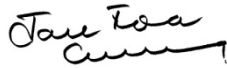


ASSOCIATED DOCUMENTS

- Sustainability Policy
- Supply Chain Policy
- Financial Procedures
- Quality Policy

RELEVANT LEGISLATION AND STANDARDS

- Bribery Act 2010
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions 1999
- United Nations Convention against Corruption



Jane Fiona Cumming

article **13**



QUALITY POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

It is the policy and overall business objective of Article 13 Ltd to provide services of the highest quality and – at a minimum – in compliance with the client’s specified requirements.

It is also the objective of Article 13 Ltd to enhance its reputation and capabilities in order to gain wider recognition in its field of expertise.

Article 13 Ltd recognises that genuine commitment to understanding the present and future needs of its clients is essential to the achievement of these objectives and thus continually strives to ensure that the needs and reasonable expectations of the clients are realised in the quality of the services it provides.

All client project deliverables will be peer reviewed.

All data is treated in accordance with the requirements of the Data Protection Act 1998

The Quality Management System is described in the Quality Assurance Manual and detailed in Quality Procedures Manual.

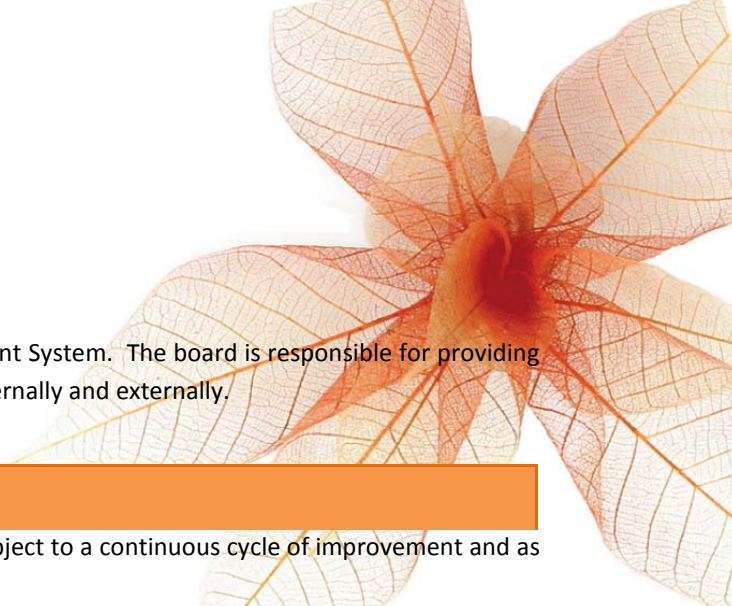
STAFF RESPONSIBILITIES

The cooperation of all employees, contractors, associates and temporary workers is essential for the success of this policy. Staff are expected to:

- Undertake Induction and refresher training on the Quality Management System and consistently integrate Company quality procedures and Customer Satisfaction Objectives into every aspect of their work
- Notify the Quality Management team of non-conformances or potential enhancements
- Project plan their activities to allow sufficient time for peer review

MANAGEMENT RESPONSIBILITIES

The Directors are responsible for implementing the quality policy. **Jane Fiona Cumming** is the designated Quality Manager of Article 13 Ltd and works closely with **Lacey Ward** (the Internal Quality Auditor) to ensure



smooth and efficient management of the Quality Management System. The board is responsible for providing oversight of these quality procedures and practices, both internally and externally.

REVIEW

Records relevant to quality processes and procedures are subject to a continuous cycle of improvement and as such are reviewed regularly as follows:

- Monthly internal audits – undertaken by the Internal Quality Auditor using the internal quality audit matrix and signed off by the Quality Manager
- Quarterly quality management meetings – attended by the Internal Quality Auditor, Quality Manager and any other member of staff as deemed appropriate
- Board meetings – included as an agenda item for discussion by members of the board
- Annual external audit – carried out by CQS (Certified Quality Systems) Ltd
- Annual revision of the manual and procedures (including this policy) – undertaken by the Internal Quality Auditor and signed off by the Quality Manager

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee and associate. All new employees will receive a hard or electronic copy and a verbal statement on quality as part of their induction training.

All staff will be notified as appropriate by email or through existing status meetings when revisions are made to the procedures, non-conformances are identified or noteworthy client feedback is received.

Staff views and questions relating to quality are actively encouraged and should be raised with the Quality Management Team.

ASSOCIATED DOCUMENTS

- Sustainability Policy
- Quality Manual
- Quality Procedures
- Customer Satisfaction Objectives
- Internal Audit Matrix
- Internal Quality Audit form
- Quarterly Management Meeting Agenda and Minutes form



- Non-Conformance form
- Customer Feedback Survey
- Training Records and Training Needs Analysis forms
- Final Brief Approval form
- Design Approval form

RELEVANT LEGISLATION AND STANDARDS

- ISO9001:2008
- Data Protection Act 1998
- Computer Mis-use Act 1990
- European Union Data Protection Directive 1981

*Jane Fiona
Cumming*

Jane Fiona Cumming

article **13**

STAFF DIVERSITY & EQUAL OPPORTUNITY POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

Article 13 Ltd recognises the importance of diversity and equal opportunities. Article 13 believes in the fair and equal treatment of all employees and that encouraging diversity is critical to our future success. This means we are committed to encouraging diversity in the work place and in doing so hope to reflect, where practical, the make-up of the local community within which we operate.

Diversity and equal opportunities are to be encouraged on the basis of sex, marital or civil partnership status, pregnancy and maternity, race, nationality, ethnic (or national) origin, religion or beliefs, age, sexual orientation, political affiliation, gender reassignment, disability, previous (unrelated) criminal offense and membership (or non-membership) of a trade union and any other legal membership organisations.

Article 13 is committed to promoting an environment where all individuals are recruited, selected for specific projects, appraised, trained and promoted on the basis of fairness and professional competence. This will enable Article 13 to tap into the widest possible sources of talent, ensure the effective use of staff and promote the best people regardless of their background.

STAFF RESPONSIBILITIES

The cooperation of all employees is essential for the success of this policy. If any employee considers that they are suffering from unfair treatment, on any of the grounds set out above:

1. we encourage employees initially to deal with unfair treatment informally first – e.g. asking the person acting unfairly to stop. The person may not realise that their actions are causing offence;
2. if the person persists, the employee affected may take further action raising the complaint with a director verbally;
3. if this is not appropriate or the issues are not resolved, then employees may speak to a non-executive director directly.

If the complainant believes the problem has still not been resolved satisfactorily, they may refer to the grievance procedure.

MANAGEMENT RESPONSIBILITIES

The Directors are responsible for implementing the diversity and equal opportunities policy.

Wherever possible, Article 13 will endeavour to resolve complaints quickly and as sympathetically as possible. Where required, counselling and support will be made available.

Appropriate disciplinary “sanctions” (up to and including dismissal) will be taken against any employee who is found to have discriminated against another person or group.

Any investigations will be carried out only with the agreement of the employee that may have been discriminated against. At all times, during and after the investigation, we will take reasonable steps to prevent further discrimination or harassment. If investigations indicate that discrimination or harassment may have taken place, the case will be dealt with under the company’s disciplinary policy.

VACANCY ADVERTISING

Wherever possible, all vacancies will be advertised simultaneously internally and externally.

Steps will be taken to ensure that knowledge of vacancies reaches under-represented groups internally and externally.

All vacancy advertisements will include an appropriate short statement on equal opportunity.

SELECTION AND RECRUITMENT

Job applicants, and staff considered for specific projects, will not be subject to discrimination.

Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

Wherever possible, more than one person will be involved in the selection interview and recruitment process, and all should have received training in equal opportunities.

Reasons for selection and rejection of applicants for vacancies will be recorded.

TRAINING, PROMOTION AND CONDITIONS OF SERVICE

Under-represented groups will be encouraged to apply for training and employment opportunities with Article 13. Wherever possible, special training will be provided for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, actual recruitment to all jobs will be strictly on merit.

Wherever appropriate, and within the law, suitably qualified people from disadvantaged groups will be given priority.

Wherever possible, efforts will be made to identify and remove unnecessary barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.



PERSONNEL RECORDS

In order to ensure the effective operation of the diversity and equal opportunity policy (and for no other purpose) a record will be kept of all employees' and job applicants' gender, declared racial origins and declared disability.

Where necessary, employees will be able to check and correct the record of their own details. Otherwise, access to this information will be strictly restricted.

Review

Article 13's policy for diversity and equal opportunity will be reviewed annually and amended as necessary.

Personnel records relevant to diversity and equal opportunities will also be analysed regularly, and appropriate follow-up action taken, including any revision of this policy.

COMMUNICATION

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on diversity and equal opportunities as part of their induction training.

Staff views and questions relating to diversity and equal opportunities are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate

Expert advice will be obtained when required from appropriate sources/organisations.

ASSOCIATED DOCUMENTS

- Sustainability Policy
- UN Global Compact Principles 1-6
- Staff Handbook
- Job Descriptions and Person Specifications
- Interview Assessment form
- Contract of Employment
- New Employee Personal Details and Equal Opportunity Monitoring Form
- Staff Training Logs
- Performance Review and Personal Development Plan templates
- Disciplinary Policy
- Grievance Procedure



RELEVANT LEGISLATION AND STANDARDS

- The Equal Pay Act 1970;
- The Equal Pay (Questions and replies) Order 2003.
- The Rehabilitation of Offenders Act 1974;
- The Sex Discrimination Act 1986;
- The Race Relations Act 1976;
- The Race Relations Act 1976 (Amendment) Regulations 2003;
- The Disability Discrimination Act 1995;
- The Disability Discrimination Act 2005;
- The Human Embryology and Fertilisation Act 1990;
- The Human Rights Act 1998;
- The Employment Relations Act 1999;
- The Employment Act 2002;
- European Directive on Equal Treatment;
- Employment Equality (Sexual Orientation) Regulations 2003;
- Employment Equality (Religion or Belief) Regulations 2003;
- The Employment Equality (Sex Discrimination) Regulations 2005;
- Employment Equality (Age) Regulations 2006;
- The Equality Acts (2004, 2006, 2010);
- The Rehabilitation of Offenders Act of 1974;
- The Sex Discrimination (Gender Reassignment) Regulation of 1999.

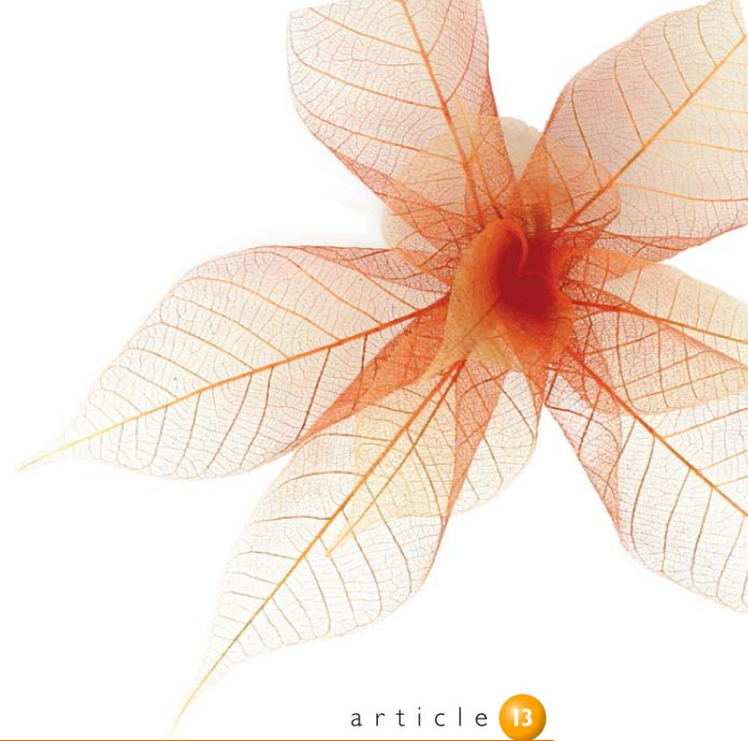


Jane Fiona Cumming

article 

SUPPLY CHAIN POLICY

ARTICLE 13 LTD



article 13

COMMITMENTS

It is the policy of the management of Article 13 Ltd in accordance with the ten principles of the United Nations Global Compact, to recognise the impact of its purchasing activities and decisions upon the local, regional and global community and environment.

As a responsible and connected corporate citizen, Article 13 is committed to continuous improvements in ethical purchasing and supply. Article 13 seeks to demonstrate active leadership in supply chain activities, and inspire its partners to do the same, such that human rights, labour standards and environmental laws and codes of practice will be regarded as setting the minimum standards for the Company's whole supply chain performance.

STAFF RESPONSIBILITIES

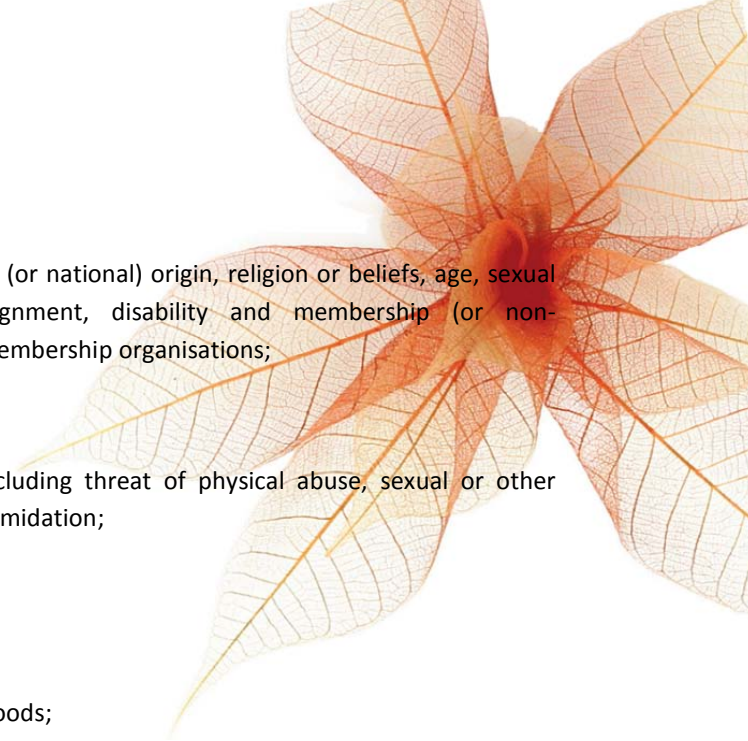
All employees and temporary workers have a duty to consider the effects of any purchasing decisions on the supply chain in relation both to Article 13's internal operations and through purchasing decisions within projects for clients and partners.

MANAGEMENT RESPONSIBILITIES

The management of Article 13 strives to source products and services, and supply the Company's services from organisations in which:

- employment is freely chosen;
- freedom of association and the right to collective bargaining are respected;
- working conditions are safe and hygienic;
- child labour is not tolerated;
- reasonable living wages are paid;
- working hours are not excessive;
- no discrimination is practiced, based on equality in hiring, compensation, access to training, promotion, termination or retirement, on the basis of sex, marital or civil partnership status,

Effective 1st August 2007; reviewed August 2009, October 2010, Updated November 2011



pregnancy and maternity, race, nationality, ethnic (or national) origin, religion or beliefs, age, sexual orientation, political affiliation, gender reassignment, disability and membership (or non-membership) of a trade union or any other legal membership organisations;

- regular employment is provided;
- no harsh or inhumane treatment is allowed, including threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation;
- environmental stewardship is practiced.

In practice, Article 13 will as far as possible:

- purchase Fair Trade items in preference to other goods;
- avoid purchases of goods or services widely known to involve poor practices;
- purchase goods made from sustainable sources using local suppliers with ethical and transparent practices.

Article 13 will also, where appropriate, raise the issue of supply chain policy during client engagements.

REVIEW

Article 13's policy for the supply chain will be reviewed annually and amended as necessary.

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on supply chain issues as part of their induction training.

Staff views and questions relating to supply chain matters are actively encouraged and should be raised with their employee representative, Office Manager or Directors as appropriate.

Expert advice will be obtained when required from appropriate sources/organisations.

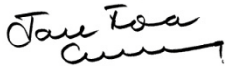
ASSOCIATED DOCUMENTS

- Sustainability Policy
- Client Engagement Policy
- Environment Policy
- Integrity Policy
- Staff Handbook
- Suppliers List

- Annual UNGC Targets
- Annual UNGC Action Plan

RELEVANT LEGISLATION AND STANDARDS

- United Nations Global Compact Principles



Jane Fiona Cumming

article **13**

SUSTAINABILITY POLICY

ARTICLE 13 LTD

article 13

INTRODUCTION

Sustainability is the ability to meet the demands of the present without compromising the needs of future generations to meet their own needs. **Sustainable development** includes the economic and social change needed to ensure that sustainability can be achieved.

The central purpose of Article 13 Ltd in its work with clients is to promote sustainability. This includes Article 13's policies for its environmental, social and economic impacts, and its impacts on its stakeholders.

Article 13's stakeholders include:

- clients;
- staff;
- associates;
- suppliers;
- the environment;
- local community


Article 13's approach to sustainability and sustainable development is described by this Sustainability Policy and related policies.

COMMITMENTS

Article 13:

- subscribes to the UN Global Compact (UNGC) and fully supports its ten principles;
- supports the UN Declaration on Human Rights;
- endeavours to conduct all its operations in accordance with this sustainability policy and related policies.

The ten principles of the UNGC to which Article 13 subscribes are as follows:

- 
- Principle 1: Business should support and respect the protection of internationally proclaimed human rights.
 - Principle 2: Business should ensure that they are not complicit in human rights abuses.
 - Principle 3: Business should uphold the freedom of association and effective recognition of the right to collective bargaining.
 - Principle 4: Business should support the elimination of all forms of forced and compulsory labour.
 - Principle 5: Business should support the effective abolition of child labour.
 - Principle 6: Business should support the elimination of discrimination in respect of employment and occupation.
 - Principle 7: Business should support a precautionary approach to environmental challenges.
 - Principle 8: Business should undertake initiatives to promote greater environmental responsibility.
 - Principle 9: Business should encourage the development of environmentally friendly technologies.
 - Principle 10: Business should work against corruption in all its forms, including extortion and bribery.

ASSOCIATED POLICIES

CLIENTS

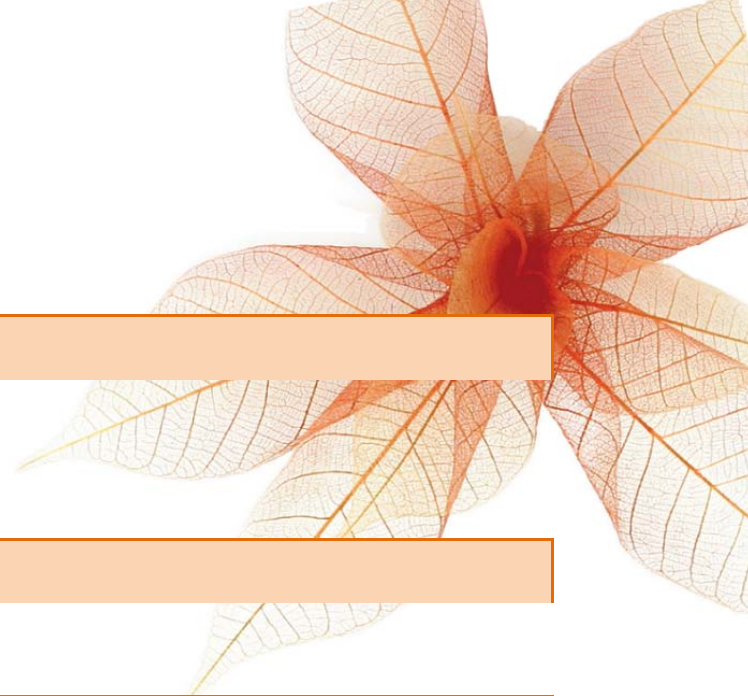
- Engagement policy

STAFF

- Health & Safety Policy
- Staff Diversity and Equal Opportunity Policy
- Training and Development Policy

ASSOCIATES

- Associates Procedures



SUPPLIERS

- Fair Commercial Terms Policy
- Supply Chain Policy

ENVIRONMENT

- Environment Policy

INTEGRITY

- Integrity Policy (for clients, suppliers and staff)

REVIEW

Article 13's policy for sustainability will be reviewed annually and amended as necessary.

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on client engagement as part of their induction training.

Staff views and questions relating to sustainability matters are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate

Expert advice will be obtained when required from appropriate sources/organisations.

RELEVANT LEGISLATION AND STANDARDS

- The United Nations Global Compact Principles

Jane Fiona Cumming

article **13**



TRAINING & DEVELOPMENT POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

Article 13 Ltd has a philosophy of continuous learning, innovation and improvement to ensure progressive development appropriate to the needs of each employee, both consulting and non-consulting. Encouraging employees to *'think outside the box'* develops the ability to evolve constantly, through innovation and improvements to the organisation, employees and stakeholders.

Article 13 aims for involvement in decision-making from the start. This builds a level of responsibility and buy-in from the team. If people are involved in identifying training and development issues and then building an action plan to address them, they are more likely to benefit and learn from each other. The combined effect is empowerment with accountability and responsibility with support; encouraged, in part, by an in-house peer review and coaching programme.

Investing in Article 13 employees is an investment for the future to ensure that staff are working to the best of their ability.

STAFF RESPONSIBILITIES

All employees and temporary workers have a duty to co-operate with management by sharing knowledge. Knowledge sharing is a key to success. Therefore, an in-house Guard file has been developed. This is a bespoke system of filing and archiving information in such a way as to provide access and cross referral to other literature, case studies, prior Article 13 experience/work or individuals.

MANAGEMENT RESPONSIBILITIES

The Directors are responsible for the implementation of the Training & Development Policy.

Candidates for jobs will be assessed against a detailed specification of skills and core competencies, as well as on their commitment to Article 13's aims.

All staff will be appraised twice annually to determine their training and development needs. The approach taken is individually tailored to build the capacity of employees and the diversity and innovation of the organisation.

To build staff competencies and to ensure current core competencies are shared within Article 13, external training sessions will be held to integrate existing and new core competencies into the organisation at all levels.

Review

Article 13's policy for Training & Development will be reviewed annually and amended as necessary.

Through six monthly performance evaluations with each employee, current and future growth opportunities will be identified. A training needs analysis should be conducted at these review meetings to ensure Article 13 can provide its staff with the best possible learning and innovative methods of improvement that can be provided via internal or external training.

The Guard file will be reviewed quarterly to ensure that Article 13 is using it, it is proving useful to the group and that emerging stakeholder needs are being incorporated.

COMMUNICATIONS

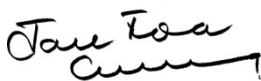
A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on Training & Development as part of their induction training.

Staff views and questions relating to training and development matters are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate.

Expert advice will be obtained when required from appropriate sources/organisations.

ASSOCIATED DOCUMENTS

- Sustainability Policy
- Staff Handbook
- Job Descriptions and Person Specifications
- Staff Training Logs
- Performance Review and Personal Development Plan templates
- Staff Diversity & Equal Opportunity Policy
- Knowledge Centre Index



Jane Fiona Cumming

article **13**

a r t i c l e  13

THE RESPONSIBLE BUSINESS EXPERTS