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- **Statement of continued support by the Chief Executive Officer**

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- *Statement of the company's chief executive (CEO or equivalent) expressing continued support for the Global Compact and renewing the company's ongoing commitment to the initiative and its principles.*
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- 11<sup>th</sup> December 2013
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To our stakeholders:

I am pleased to confirm that Slightly Different reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Nic Drew  
Technical Director

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## Human Rights

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- **Assessment, policy and goals**

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- *Description of the relevance of human rights for the company (i.e. human rights risk-assessment).  
Description of policies, public commitments and company goals on Human Rights.*
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- Slightly Different support wholeheartedly the Universal Declaration of Human Rights and are opposed to any form of abuse of human rights.
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Our employment contracts are specific in addressing the rights of the individual, and we ensure that we comply with all existing legislation when employing any form of labour, be that full or part time staff within our offices, working with external consultants, or contracting with external suppliers.

All companies with whom we work, including both clients and suppliers, are ethical companies with a strong belief in the rights of the individual. Where there is any doubt in our minds as to the efficacy of a client or supplier's policy on this, we choose not to work with those companies and organisations.

While our sector is not normally known for human rights abuses, the potential exists when outsourcing to other agencies for those companies to breach human rights of their employees, or be complicit in allowing this to happen throughout their supply chain. We are particularly conscious of those companies who choose to outsource overseas to areas where breaches of human rights are more endemic than within the UK, and this policy is not something that Slightly Different condones.

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As a minimum, we ensure that the working conditions of anyone associated with Slightly Different are to acceptable standards, and where possible we endeavour to exceed these standards, as the welfare of the individual is of paramount importance to us. The Company Directors operate under the principle of treating others as we would wish to be treated ourselves and this applies equally to our staff, our suppliers, and our clients.

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- **Implementation**

- *Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.*
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- Slightly Different has a formal grievance mechanism in place for all staff, with an independent arbiter available for unbiased opinion. I am pleased to report that this has never been used, and am confident that this is due to the high standard of working conditions which we have in place. In addition to this, we operate an open management structure where any member of staff, no matter how junior, can approach senior management, Directors, and indeed shareholders, and ask questions about company activities.

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We hold regular team meetings where any subject can be discussed in a public forum without fear of reprisal or consequence, and we have a management team in place comprised of senior members of staff together with the company Directors. In addition, the outcomes of all management and Board level meetings are reported to the entire team on completion of the meeting and questions are invited.

We also have a policy where any of our staff can flag a problem with a potential client or supplier and this is taken seriously by company management. As a result of our internal ethical policies, we choose as a company not to work with others not just who are known to infringe human rights, but also with those which breach our ethical policy including companies involved with illegal activity or the promotion of illegal activity; those involved with any form of gambling; companies who trade in tobacco, firearms, or questionably ethical animal related products, e.g. fur trade, and those who promote any form of addictive behaviour amongst their clients. We also will not work with companies who promote or are known to support extreme political viewpoints. This stance protects our integrity as a company, but also protects the human rights of those who would otherwise have to work on projects involving subject matter which they may find distasteful or offensive to their own personal beliefs.

Where consultation needs to be made, we work with an external specialist human resources consultant who advises the Board of Directors on the most appropriate course of action for the particular circumstance. This ensures that we are compliant with employment legislation and the human rights of the individual.

The responsibility for the protection of human rights within Slightly Different lies with the Board of Directors, with suggestions and input being welcomed from any member of the Slightly Different team at any time.

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- **Measurement of outcomes**

- *Description of how the company monitors and evaluates performance.*
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- Should Slightly Different become aware of a Human Rights violation by any of our clients or suppliers, we have a zero tolerance policy, and as a result we would immediately cease working with them and we would not consider working with them again in the future.
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The most effective evaluation of our own performance comes from the people with whom we work. Despite the economic climate we endeavour to reward our staff consistently above the regional average in a number of ways, and this reflects on their professional attitude and their commitment to excellence in all that they do.

During the last 12 months, Slightly Different has maintained an unblemished record in maintaining respect for the individual, with no complaints or grievances being made evident to the Board of Directors throughout this time. We intend for this situation to continue, and where possible we will improve the efforts we are making in this respect still further by proactively pursuing areas of improvement to working conditions for all staff on an ongoing basis.

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## Labour

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- **Assessment, policy and goals**

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- *Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities). Description of written policies, public commitments and company goals on labour rights.*
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- Every company within the UK must comply with both UK and EU employment legislation to ensure that its staff are treated fairly and without discrimination, and this is reflected within Slightly Different policy and procedures including our Health and Safety policy, employment contracts, and non-discrimination policies. We are committed to maintaining positive labour relations, and encourage open debate between the team and the Board of Directors about issues that affect them or that they feel need to be discussed, either via direct communication or via the management board comprised of Directors and senior members of the team.
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As a team, we have a zero tolerance policy for all forms of forced and compulsory labour both within Slightly Different and within our clients and suppliers. We also are vehemently opposed to any form of child labour and discriminatory practices.

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- **Implementation**

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- *Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.*
- Each employee of Slightly Different has an employment contract which clearly states the terms under which they need to perform their duties. Each employee has a package of benefits in return for which they are contracted to work a minimum number of hours which is compliant with international legislation. In addition, each Slightly Different employee receives paid holiday each year, together with time off allowances for being ill, tolerance for special circumstances, and flexibility with when and how they work depending on individual circumstances, e.g. child care requirements.

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No employee of Slightly Different is treated any differently to any other, and through a number of actions taken by the Board of Directors the company ensures that working conditions exceed acceptable standards. These actions include the formation of a management team comprised of members of the team, the encouragement of open discussion between employees and senior management/shareholders, and the implementation of a suggestion scheme.

One member of the team is responsible for health and safety within the working environment, however a global approach is encouraged and any suspected health and safety hazards are brought to the attention of management or indeed rectified at source by individuals. While our offices are not particularly hazardous, with trailing wires being the primary hazard, health and safety of the working environment is a key consideration at all times.

Discrimination is not only unlawful, but it is also highly detrimental to business practice. We do not condone discrimination of any kind, and regardless of the race, colour, creed, or individual circumstances of an individual, Slightly Different will always employ the best person for the role based on their skillset, their ability, and their professional competence to do the job in question.

Where possible, all staff are rewarded commensurate with their skills and contribution to the team output, and this is reviewed on a bi-annual basis for all staff on an individual basis by senior management in accordance with specific key performance indicators agreed with the individual member of staff. These indicators include professional development criteria to ensure that all employees are encouraged to enhance their individual skillsets throughout their employment with Slightly Different.

One member of the Board of Directors is directly in charge of protecting labour rights within Slightly Different, although responsibility for this lies with the entire Board. Oversight of this protection is provided by senior members of the management team to ensure that labour rights are protected from the grass roots level, rather than using a top down approach.

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- **Measurement of outcomes**

- *Description of how the company monitors and evaluates performance.*

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- While we do not keep demographic information deliberately as we believe that even recording this information is immaterial given our comprehensive non-discriminatory stance, within our team of 13 people, we have employees ranging in age from mid 20s through to early 60s, with just over 38% of the employees being female which is above average for the IT industry and an increase of 13% within the past year. All staff are of white ethnicity due to the overwhelming white demographic of the region in which we operate. We have one Eastern European working within the team who is originally from Lithuania, although the rest of the team are of British origin. Previously we have employed people from other nations including Germany and South Africa. With regards to religion and sexual orientation of our staff, we do not record this information as this is a private matter for them as individuals.

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While UK employment legislation is complex, we endeavour where possible to comply with all regulations and to treat our employees fairly as we would wish to be treated ourselves. Where necessary we take external advice, and as a result of our care to ensure that we enforce

Labour principles compliant with the Global Compact position, we have never had a breach or complaint about unfair treatment since the Company formation in 2000.

The rights of all employees are continuously reviewed to ensure that the Slightly Different team are happy and that they are fulfilled and motivated by their work. This is evident in the standards of work that we produce, and the best evaluation of this is through the employees themselves who are all encouraged to let management and Directors know what they think. This creates a positive and healthy working environment for all and allows the occasional minor issues to be addressed immediately, thus eliminating the possibility of escalation.

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## Environment

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### • Assessment, policy and goals

- *Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.*

- Slightly Different is a keen supporter of protecting the environment wherever possible. While our environmental footprint and impact is minimal due to the nature of the work that we undertake, we are always keen to reduce our footprint and actively seek ways in which we can do this at all times.

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The primary source of environmental impact for Slightly Different is through the use of power, business travel, and waste, and these have all been addressed through reducing business travel where possible, and operating a robust recycling policy as part of our environmental policy which includes onsite access to recycling facilities and actively encouraging team members to recycle wherever possible.

We intend to continue reviewing our environmental impact on a regular basis and we can isolate electricity usage statistics throughout our office which will make monitoring our usage of this much more quantifiable. During the past 12 months we have sought to combine more business travel with other activities to ensure that if we have to undertake business travel, that we achieve multiple tasks from the same journey with a goal that no long journey should be undertaken without at least a dual purpose. Our aim has been to reduce business journeys by around 25% during the past 12 months compared to last year which we have far exceeded yet we will continue to take measures to keep business journeys to a minimum.

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### • Implementation

- *Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.*

- All Slightly Different employees are encouraged to maintain awareness of their environment and to contribute to the company's environmental risk awareness, introducing new measures wherever possible. Recycling of waste is one of the policies where we have developed robust measures, including reuse of waste paper wherever possible, reduction in printing of documents unless absolutely necessary, the engagement of a company to shred confidential

waste which is then reused to make more paper, and various other measures designed to reduce our environmental footprint.

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Business travel presents difficulties for the company given our office locations within the UK, however the increased use of remote communication tools, cloud based data and information sharing tools together with online collaborative working tools, and actively seeking to achieve multiple objectives from a single business journey have all had a positive impact in this area. These efforts will continue throughout 2014.

We are also keen to encourage our suppliers to reduce their environmental footprints and where possible we commission companies who can demonstrate their environmental credentials, either through the use of green fuels or environmentally friendly services.

One member of the team is responsible for the environmental policy throughout the company and is actively engaged in monitoring and improving our environmental performance. As a result we are highly environmentally efficient, and this is a regular topic of discussion within management and Board level meetings.

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- **Measurement of outcomes**

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- *Description of how the company monitors and evaluates environmental performance.*

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- Slightly Different are actively monitoring our environmental performance through indirect measures such as the budget we spend on paper throughout the year, the number of sacks of confidential waste we have generated in a year, the increased use of recycling bins within the office, and the monitoring of electricity usage. During the past 12 months we have reduced our paper usage by 25% and as we encourage printing and copying when only absolutely essential we would anticipate a further reduction in 2014. Our intentions to reduce business journeys have resulted in a reduction in business travel of over 80% during the past 12 months. Whilst our location still presents a significant need for business travel we encourage staff to consider all forms of communication in order to minimise our carbon footprint wherever possible.
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## Anti-Corruption

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- **Assessment, policy and goals**

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- *Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment).  
Description of policies, public commitments and company goals on anti-corruption.*

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- As a developed nation, the UK is relatively low on the risk of corruption and bribery index, with robust legal penalties for those found guilty of breaching existing corruption legislation. Enhanced levels of monitoring, particularly of public sector activity, ensures that corruption is kept to a minimum.
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From Slightly Different's perspective, we have a zero tolerance policy on corruption and have guidance in place for staff should they be offered any form of gift by a client or supplier. Procurement, particularly with new suppliers, is always approved by more than one person, and we are fully compliant with all existing UK legislation.

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We don't generally experience corruption, bribery or extortion as we don't operate at the levels where this sort of activity would become attractive to those of this character. Given the penalties involved, this forms a sufficient deterrent, and there have been no incidents of this type involving Slightly Different over the last 13 years.

That said, the possibility of this is not ruled out, and we have an anti-corruption policy in place which senior management are made aware of, and which is disseminated to our staff. While no specific goals are in place for the upcoming year, we are keen to maintain our individual and corporate integrity and those in positions that could be prone to this kind of activity are obliged to report any unusual activity to the management team as per our policy so that the matter can be addressed before it becomes an issue.

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- **Implementation**

- *Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.*
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- Our open management structure ensures that communication is maintained throughout all activities, and any possibility of corruption is able to be addressed immediately. This has not proven to be a problem, and the matter has not been raised since the Company formation.
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All staff are aware of various internet related threats particularly via spam email, and we publicise awareness raising materials on our company blog to alert others of the existence of online scams. We also individually advise clients, particularly those who are actively trading online, how to implement anti-corruption measures.

The Board of Directors are collectively responsible for anti-corruption measures taken within Slightly Different, and these are reviewed regularly throughout the year to ensure that we are aware of the current risk profile.

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- **Measurement of outcomes**

- *Description of how the company monitors and evaluates anti-corruption performance.*
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- Slightly Different have had no incidents of corruption in the last 13 years, however in the event of any such incident in the future this would be dealt with robustly by the Board of Directors, using legal advice where appropriate. All internal policies are regularly reviewed by senior management with changes to address current risk profiles made on an ongoing basis as required. All staff are briefed on existing legislation at staff training days and the company policies are reviewed to ensure that everyone is aware of the company position, and this forms part of our induction process for all new staff.