



i2a's Communication on Progress UN Global Compact

October 2011



Good Business

Table of Contents

Executive Statement.....	3
About i2a.....	3
Statement of continued support.....	3
Actions taken in support of the principles of the United Nations Global Compact	4
Human rights	4
Labour standards.....	4
Environment	5
Anti-corruption.....	5
Current and planned outcomes.....	6
Human rights	6
Labour standards.....	7
Environment	7
Anti-corruption.....	8
Appendix A: Code of conduct.....	9
Appendix B: Equal opportunities policy	15

Executive Statement

About i2a

i2a is a boutique Management Consultancy based in London, UK. We are a team of 14 consultants, who work with clients on issues related to compliance, social responsibility and change management.

Statement of continued support

This report shows performance against the Global Compact principles, to which i2a continues to be committed.

The UNGC Principles and i2a's values are embedded within our organisation. We believe these values and principles are an inherent part of our success and strive to uphold them to the best of our ability in all the activities we undertake.

Our code of conduct, values and operating principles reflect the principles of the Global Compact and our employees are assessed against these values and principles as part of their half-yearly progress reviews. We also publish our principles on our website and discuss them as part of our recruiting process; one of the criteria for assessing the suitability of a new colleague is whether they "fit" with our values.

Our Operating Principles summarise the explicit choices we have made about how we work together as a team. In addition, to this we:

- Manage our business to comply with all local laws and regulations where we operate
- Ensure we are open, honest and respectful in our dealings with our clients and each other
- Perform our work safely, complying with our clients' safety processes and procedures, as well as with any local legal health, safety or security requirements
- Immediately raise and discuss any ethical issues or concerns we have while working on client Projects
- Minimise our environmental impacts.

We periodically review our policies with the principles of the United Nations Global Compact in mind. We strive to set ourselves ambitious targets and to ensure that commitments become actions.



Signed: Alan Holroyd, Partner

Actions taken in support of the principles of the United Nations Global Compact

Human rights

Principle 1- Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2 - make sure that they are not complicit in human rights abuses.

At i2a, we ensure that our employees act in an ethical manner, setting standards over and above those set by national and international laws. The code of conduct includes:

- A commitment to ensuring that all employees have a safe and secure environment to work in
- Advice on how to report discrimination or harassment in the workplace
- Our approach to data privacy and the protection of client and other sensitive data

We ensure that our code of conduct is read and understood by all employees, and provide practical examples of how to deal with ethical dilemmas. Please see appendix A for the full wording of our code of conduct.

i2a is an equal opportunities employer, and our equal opportunities policy (provided in full in appendix B) outlines our commitment to ensure that no employee is discriminated against due to their gender, race, religion, sexual orientation or disability.

We aim to contribute in a meaningful way to the community and our employees engage in out of work activity which supports both national and local charities.

Labour standards

Principle 3 - Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4 - the elimination of all forms of forced and compulsory labour;

Principle 5 - the effective abolition of child labour; and

Principle 6 - the elimination of discrimination in respect of employment and occupation.

i2a complies fully with all aspects of UK labour law, which includes provisions for a minimum working age, minimum wage, maximum working week and paid time off. We also go beyond these basic legal requirements to create a pleasant working environment in which employees feel that they have a voice, are treated with respect and are fairly rewarded both in terms of financial and non-financial benefits.

i2a is an equal opportunities employer, and our equal opportunities policy (provided in full in appendix B) outlines our commitment to ensure that no employee is discriminated against due to their gender, race, religion, sexual orientation or disability. Women and ethnic minorities are well represented in our workforce, reflecting the diverse UK community.

In addition, our code of conduct (provided in full in appendix A) includes a commitment to ensuring that all employees have a safe and secure environment to work in and advice on reporting discrimination in the workplace.

At i2a, supporting the local community is important to us, and we look to engage local suppliers of goods and services wherever possible. We have, in 2011, commissioned work from design agencies, printers and catering companies all based within 1km of our office.

Environment

Principle 7 - Businesses are asked to support a precautionary approach to environmental challenges;

Principle 8 - undertake initiatives to promote greater environmental responsibility; and

Principle 9 - encourage the development and diffusion of environmentally friendly technologies.

We recognise that nearly every activity carried out by i2a and its employees will have some impact on the environment. As a company, we strive to minimise this impact through:

- Using virtual meeting technology and teleconferencing where appropriate
- Minimising usage of office consumables
- Recycling as much as possible. This includes providing recycling facilities in the office that are also used by another company that shares our office space.
- Encouraging people to use public transport and providing facilities for our employees who wish to cycle. To date, three of our employees have chosen to sign up to the Government's cycle to work scheme and have therefore reduced their carbon footprint by cutting down the journeys they are making by car each day.
- Minimising energy use in the office, through policies on switching off lights and appliances that are not in use.
- Engaging local suppliers of goods and services wherever possible, reducing the need for travel.

Anti-corruption

Principle 10 - Businesses should work against corruption in all its forms, including extortion and bribery.

Our code of conduct (see appendix A) states that bribery and the making of facilitation payments are completely contradictory to i2a's values and will not be tolerated under any circumstances. We have also ensured that our employees are familiar with the recently passed UK Bribery Act, and that they comply with this.



Good Business

Our code of conduct provides practical advice on dealing with corrupt practices, including conflicts of interest, and we encourage an open environment in which employees can air their concerns.

Our employees have in the past year worked with clients to update or review their internal policies and processes relating to anti-bribery and corruption.

Current and planned outcomes

We have used elements of the GRI G3 Sustainability Reporting Guidelines in order to report our current and planned outcomes, selecting the indicators that are most relevant to i2a. These are set out below.

We are working towards measuring more of our outcomes using the suggested performance indicators and other relevant measures. This work is on-going and will be reported on in our next Communication on Progress.

Unless otherwise stated, all outcomes refer to the year to 1st October 2011.

Human rights

HR4 - Total number of incidents of discrimination and actions taken.

There have been no incidents of discrimination reported.

EC 5 - Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.

i2a is based in the UK, which has a national minimum wage of £5.93 per hour. The entry level wage at i2a during the period 1 October 2010 to 1 October 2011 equates to 232% of the national minimum wage.

LA 7 - Rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities by region.

There have been no injuries reported in the last year at our office, travelling to work or at client offices.

LA 13 - Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.

The partner group is made up of two male and one female member. At the 1st October, the total number of employees was 11, of which 6 were male and 5 female. In accordance with UK law, we do not discriminate by age and we hold no data on minority group membership or ethnic diversity.

LA 14 - Ratio of basic salary of men to women by employee category.

Statistically, it is difficult to draw conclusions as the number of employees at each employee category is low: in many of these categories, the employees are all male or all female. At Senior Consultant level, the ratio of female to male salaries is 93%, though the sample size is 3 employees and the salaries of the employees is also dependent on industry experience and length of employment with i2a. At partner level, this ratio is 100%.

The other employee categories are all male, all female or lacking in sufficient data to conclude a ratio.

PR 2 - Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.

There have been no incidents of non-compliance with regulations and voluntary codes.

PR 8 - Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.

There have been no complaints, substantiated or otherwise, regarding breaches of customer privacy or loss of customer data.

Labour standards

LA 2 - Total number and rate of employee turnover broken down by age group, gender, and region.

Our team has averaged 13 members in the past year. In this time, 4 team members have moved on to other employment, of which three were female and one male.

LA 13 - Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.

The partner group is made up of two male and one female member. At the 1st October, the total number of employees was 11, of which 6 were male and 5 female. In accordance with UK law, we do not discriminate by age and we hold no data on minority group membership or ethnic diversity.

LA 14 - Ratio of basic salary of men to women by employee category.

Statistically, it is difficult to draw conclusions as the number of employees at each employee category is low: in many of these categories, the employees are all male or all female. At Senior Consultant level, the ratio of female to male salaries is 93%, though the sample size is 3 employees and the salaries of the employees is also dependent on industry experience and length of employment with i2a. At partner level, this ratio is 100%.

The other employee categories are all male, all female or lacking in sufficient data to conclude a ratio.

HR4 - Total number of incidents of discrimination and actions taken.

There have been no incidents of discrimination reported.

Environment

EN 18 - Initiatives to reduce greenhouse gas emissions and reductions achieved.

i2a offers tax-free bicycles to employees under the governments Cycle to Work scheme. To date, three employees have purchased bicycles under this scheme and are using them regularly to commute to work.

EN 28 - Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.

i2a have received no fines or non-monetary sanctions for non-compliance with environmental laws and regulations.

EN 29 - Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.

As a business services provider, the main environmental impact of what we do is our daily commute. We aim to minimise this by encouraging employees to cycle to work, or use public transport, by ensuring that our offices are located near to a public transport hub and by supporting working from home, providing all employees with access to conference call and remote working facilities.

Anti-corruption

SO 3 - Percentage of employees trained in organization's anti-corruption policies and procedures.

All employees were issued with guidance following the introduction of the UK Bribery Act.

SO 6 - Total value of financial and in-kind contributions to political parties, politicians and related institutions by country.

i2a have made no financial or in-kind contributions to political parties, politicians or related institutions.

Appendix A: Code of conduct

Our Conduct

We believe the values that form the core of our culture differentiate us as a company. We are united by a group by these values and have made explicit choices about how we want to work together as a firm based upon them - these we call our operating principles. Our values and operating principles provide the foundation for our Code of Conduct.

Our values are as follows:

- **Trust:** Trusting ourselves and colleagues to get things done efficiently and to the highest standards
- **Discipline:** Balancing freedom to operate with the discipline that is required for us to achieve our goals
- **Excellence:** Delivering our work that exceeds our clients' expectations
- **Persistence:** Understanding that lots of little things add up to create big results
- **Self-belief:** Having the confidence that our individual skills and experience can make positive difference
- **Team Work:** Working effectively together in teams to achieve exceptional results

Our Code cannot address every situation or provide guidance on every issue we will encounter. However, please take time to read the Code and seek clarification on anything about which you are unsure and apply it every day in your work with *i2a* and our clients.

Our Operating Principles

- We approach challenges proactively believing in a positive outcome.
- We accommodate personal preferences in the way we run our business whenever we can.
- We choose our client engagements and assign our resources based on our capabilities and our comfort that we can deliver.
- We do what we say we will do and immediately make clear if we cannot keep a commitment.
- We have freedom to act, but act in a disciplined way based on our operating principles and values.
- We are polite and honest, and treat our colleagues and our clients with respect.
- We work inclusively, exploring all options, and use our experience to best effect.

Compliance with the Code

At *i2a* we are committed to working in a way which reflects our values and operating principles. Our Code provides guidance on how we should conduct ourselves in everything we do as representatives of *i2a*. All Partners and employees of *i2a*, and anyone acting on *i2a*'s behalf, are expected to abide by the Code, regardless of their role or grade. Any breaches of the Code will be treated very seriously and may result in disciplinary action.

Raising concerns



Good Business

The *i2a* culture promotes seeking help and guidance from our colleagues when unsure about an issue or in doubt about the correct way to act. However, if you believe that a colleague or representative of *i2a* is acting in a manner that is not aligned to our Code, you should raise your concern with your Reviewer or any one of the *i2a* Partners. Based on the nature of the concern an appropriate response will be determined. *i2a* will not tolerate any reprisals against anyone raising a compliance concern in good faith.

Code guidance

The guidance contained in this Code is divided into four main sections:

- Our company
- Our clients
- Our people
- Our community

Each section contains details of the standards to which we expect everyone to operate in undertaking certain business activities.

At the end of the document are links to other *i2a* policies which underpin and support our Code. You should also familiarise yourself with each of these. However, we recognise that the Code cannot cover every situation that may arise and good judgement and common sense should always guide our actions.

Q: How should I handle situations not covered by the Code?

A: In such situations it may be helpful to ask yourself some questions:

- Is the action legal?
- How would it appear to others?
- Is it in line with *i2a*'s values?

In addition, you can always seek guidance from your colleagues and *i2a* Partners.

Our Company

We are all responsible for promoting the best interests of i2a in our work and must ensure that our actions and personal interests never conflict with them

Conflicts of interest

Conflicts of interest occur where our personal interests come into conflict with those of *i2a*. Conflicts can arise in many ways, for example as a result of affiliations with competitors, clients or suppliers. Improper use of company assets could also be regarded as a conflict of interest.

We must avoid any real or perceived conflict of interest and we should always consider carefully situations in which our loyalty may be divided. Any situation which gives rise to, or could potentially give rise to a conflict of interest should be disclosed to one of the *i2a* Partners. In the majority of cases, actual or potential conflicts can be resolved in an acceptable way for all concerned.

Information security



Good Business

i2a's IT systems and the information stored on them are critical to our company's activities. Their misuse or lack of diligence in protecting the security of them has the potential to be damaging to both *i2a* and our clients. For that reason, compliance with the *i2a* IT Code of Conduct (as laid out in the *i2a* Employee Handbook) is mandatory.

i2a's digital resources, including systems, software, and telephone and email services are intended to be used for conducting *i2a* business. Incidental or occasional personal use of such assets is permitted but business functionality should never be compromised.

Bribery & Corruption

Bribery is completely contradictory to *i2a*'s values, in addition to being illegal in most countries, and we will not tolerate it under any circumstances.

We view the making of facilitation payments in the same way - these payments are a form of corruption and are harmful to wider society. We must never give or promise anything, for example, money, services, gifts, or excessive entertainment to anyone that is intended to or could be construed as intending to influence the decision of those with whom we come into contact in undertaking our business.

Accurate records

Any data, information or records which we create or for which we are responsible should be correct and accurate. Such information can take many forms and includes recording of the time we spend on client engagements and our travel and expense claims.

We must never make a false or misleading entry into any report, record or expense claim.

Q: A relative of mine works in the procurement department of a potential client to whom we have recently submitted a proposal for work. Could this be seen as a conflict of interest?

A: Whether a conflict of interest exists will depend upon the role of your relative and their involvement in the procurement process. You should make a Partner aware of the situation and an appropriate course of action can be agreed, dependent on the circumstances.

Our Clients

We pride ourselves on working in partnership with our clients to develop and deliver the best solutions to their challenges

Hospitality & gifts

Corporate entertainment is a normal part of working with and developing relationships with clients and potential clients. However, it should never be engaged in for the purposes of creating improper influence, particularly related to a specific business decision. It should never be excessive or inappropriate.

Gifts, either given or received, should be of a nominal value and ideally relate to our own or our client's brands. Before offering or accepting hospitality or gifts, the approval of an



Good Business

i2a Partner should be sought. You must also maintain your own record of any hospitality or gifts, either given or received.

Data privacy

i2a holds data relating to clients and suppliers, in addition to our current and former employees. We must respect the confidential nature of any data we hold and ensure that it is only used for the business purposes for which it was collected.

Confidential information

The nature of our work and the way we work in close partnership with our clients means that we often have access to sensitive or confidential data. We must ensure that confidential information and intellectual property, both client materials and internal, documents are held securely and are not shared beyond the relevant people without obtaining the necessary permissions.

Client policies

When we are working on client engagements, we will always comply with our client's policies and procedures, including travel, expenses, gifts and entertainment, security, IT use etc.

In the unlikely event that any of these policies are in contradiction with this Code, we will raise this issue with our clients and seek an acceptable solution.

Q: I have two tickets to the Wimbledon final but I can't go. I thought it would be a good idea to give them to a client I am currently working with so he can go with his wife. Is this okay?

A: Any entertainment we offer should be for business purposes and in the interests of furthering our relationships with our clients. As you are unable to attend yourself and if it is not appropriate for another *i2a* person to attend in your place, you should not make this offer.

Our People

We are committed to providing a safe workplace that is free from discrimination, harassment and provides equal opportunities for all

Health, safety & security

i2a is committed to ensuring we all have a safe and secure environment to work in. We are all responsible for complying with the *i2a* Health & Safety Policy at all times and if we see anybody working in an unsafe manner, we must draw this to the attention of the individual.

Harassment & bullying

All of us are entitled to work in an environment free from harassment or bullying, and we are fully committed to our operating principle of being "polite, honest, and treating our colleagues and clients with respect".



Good Business

i2a will not tolerate harassment or bullying in any form.

Equal opportunity

We believe every person at *i2a* should be given the opportunity to develop their skills through experience, regardless of gender, race, religion, sexual orientation or disability.

To that end, the *i2a* Equal Opportunity Policy highlights how we implement this and what it means for you.

Inclusion

We know that a substantial part of our strength comes from combining our collective skills and experience to explore all options before determining the best solution. We therefore seek projects where we deliver as an *i2a* team, where we can challenge and support each other, and will always endeavour to understand and consider our personal preferences when working together.

Q: At a recent *i2a* event a prospective client made some very inappropriate comments to one of my colleagues. She was clearly uncomfortable but aware that this could be a potentially lucrative project so did not say anything further about it. Should I speak up?

A: It is important to us that no one feels harassed or bullied in any way. You should encourage your colleague to talk to her Reviewer or one of the *i2a* Partners about her experience, so that the appropriate action to take can be determined.

Our Community

We respect and support efforts towards enhancing and protecting the local communities and environment where we work to enable sustainable long term success

Charitable activity

At *i2a* we strongly believe in using our expertise to benefit our local community, and we have links to certain charitable organisations which aim to benefit the society in which we operate.

We also encourage and support our people who wish to carry out charitable work and do our best to enable people to participate in these activities alongside their employment at *i2a*.

Our people are obviously also welcome to donate financially to any charities they wish, but in doing so, it should be clear that the donation is a personal one and that *i2a* is not associated with personal charitable donations.

Environment

We recognise that nearly every activity carried out by *i2a* and its employees will have some impact on the environment. As a company, we strive to minimise this impact through:

- Using virtual meeting technology and teleconferencing where appropriate
- Minimising usage of office consumables



Good Business

- Recycling as much as possible
- Encouraging people to use public transport and providing facilities for our employees who wish to cycle.

The *i2a* Environmental Policy provides more information and guidance in this area.

Political activity

We understand that individuals may choose to have affiliation with political parties through participation or contributions. Those who choose to be involved with any political organisation must do so in a private capacity and must ensure that it could not be open to the misinterpretation that the activity is undertaken on *i2a*'s behalf.

Media engagement

Our brand and reputation are critical to the success of our business. When we engage with the media, we must ensure that the information we provide is accurate and consistent. If you are asked to speak or comment in a professional capacity on *i2a*'s behalf, you should speak to one of the Partners before making any commitment to do so.

Q: I've been invited to speak at a meeting of a charity with which I'm involved. They have asked if I can provide some insights on the way large corporates work with charities based on the clients I have worked with. Is this okay?

A: Before accepting you should discuss the matter with an *i2a* Partner. If you do go ahead you must ensure that you do not reveal information which is not publicly available or comment in any way which could be viewed as in conflict with *i2a*'s interests.

Appendix B: Equal opportunities policy

1. Introduction

This policy is an excerpt of i2a Consulting's Employee Handbook, which contains its full list of policies and procedures. References to the Company refer to i2a Consulting LLP.

2. Equal Opportunity Policy

The Company recognises that it has clear obligations towards all its employees and the community at large to ensure that people are afforded equal opportunities to enter employment and progress within the Company. As an equal opportunities employer, the Company is committed to promoting the equal treatment of individuals regardless of their sex, marital status, race, ethnic or national origin, disability, religion, sexual orientation or age. Under the Company's Equal Opportunities policy, no job applicant or employee will receive less favourable treatment on any of the grounds listed above. The policy extends to all areas of operation and employees are required to reach decisions and act in ways that are both lawful and reflect the spirit of the equal opportunities policy. The Company acknowledges its obligation not to discriminate unlawfully against the self-employed and contract workers and the policy applies to the treatment of clients. The Company is committed to its Equal Opportunities policy and all employees and business guests are requested to co-operate with its efforts to ensure that the policy is implemented in full.

2.1. Disabled Employees

The Company acknowledges the difficulties that disabled people face in securing employment. When considering a candidate for a job, the Company will always focus on the abilities of an individual and not what he/she cannot do. Where possible, the Company will make use of Government assistance to support the employment of disabled people. The Company recognises its obligation to make reasonable adjustments to the workplace and to its employment procedures to assist applicants and employees. The Company will discuss individual needs with persons with disabilities and, where appropriate, take expert advice. Adjustments which the Company will consider include:

- Making adjustments to premises;
- Allowing absences from work to facilitate rehabilitation treatment or assessment;
- Providing training for disabled employees;
- Acquiring or modifying equipment;
- Modifying instruction or reference manuals;
- Modifying procedures for testing or assessment;
- Provision of supervision.

As far as is practicable, the Company will provide help and assistance to any employee who becomes disabled and wishes to remain in employment with the Company. Equal Opportunity Policy 2

2.2. Termination



Good Business

Policy and procedure relating to the termination of employment, particularly where selection criteria for redundancy are concerned will be designed to ensure that they are not discriminatory.

2.3. Anti - Harassment at Work Policy

It is Company policy that all employees have the right to work in an environment free of harassment in order to ensure the maintenance of a productive and professional work setting. The Company will not tolerate employee behaviour or conduct which involves the harassment of any fellow employee. Such behaviour is completely unacceptable.

Harassment consists of unwanted and offensive conduct, whether verbal, non-verbal, physical or visual, conduct of a sexual or other nature occurring with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment, which is based upon an individual's sex (including their marital status or sex change status), race (including colour, religion, nationality or ethnic or national origin) or disability. Harassment can damage an individual's concentration and work performance and create a hostile work environment.

The Company is also concerned to prevent the effects that harassment can have upon a person's health, confidence and morale. Employees should also note that harassment on the grounds of sex, race or disability is unlawful discrimination for which individuals, as well as the Company, can be liable to pay compensation. Serious harassment may also constitute a criminal offence. Breach of this policy is a disciplinary offence, for which the penalties, depending on the seriousness of the incident, may include summary dismissal.

The Company expects all employees to comply with this policy and to ensure that it upheld. This includes temporary and other contract or agency workers. No employee or non-employee may engage in any form of unlawful harassment in the Company's work or work-related environment. The Company expects all of its business guests and all employees, both supervisors and co-workers, to observe this standard of conduct. Failure to do so is grounds for disciplinary action, up to and including dismissal.