



LPC CONSTRUCTION LIMITED
UN GLOBAL COMPACT

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COMMUNICATION ON PROGRESS (COP)

LPC Construction Ltd is committed to do all that is reasonably practical within our sphere of influence to embrace, support and enact a set of core values in areas of human rights, labour standards, the environment and anti-corruption.

I, the Managing Director, with the support of the Board of Directors express my continued support for the Global Compact and hereby renew our ongoing commitment to the initiative and its principles. This COP relates to the period of the 2011 calendar year (01/01/2011-31/12/2012).

Our key policies, which set the direction and policy in the four issue areas have been reviewed and revised and are as follows:-

- Health & Safety Policy Issue 11 Revised 01/11/2011
- Environmental Policy Issue 9 Revised 01/11/2011
- Quality Policy Issue 8 Revised 01/11/2011
- Bribery Act Policy Issue 1 Implemented 05/09/2011
- Business Conduct Ethics Policy Issue 2 Revised 01/11/2011
- Environmental Procurement Policy Issue 2 Revised 01/11/2011
- Equal Opportunities Policy Issue 4 Revised 01/11/2011
- Equality & Diversity Procurement Policy Issue 2 Revised 01/11/2011
- Ethical Procurement Policy Issue 2 Revised 01/11/2011

Our actions insofar as they related to the four issue areas in 2011 were as follows:-

Human Rights

We support the Universal Declaration of Human Rights. We have a Business Ethics Policy stating our respect of human rights. Our Supplier Approval process includes reference to our participation in the UN Global Compact and states our expectation that our suppliers should respect and support the protection of internationally proclaimed human rights and that they should ensure that they are not complicit in human rights abuses. We operate a Consultation and Participation Procedure which includes an employee suggestion scheme and employee forums. One of our goals in 2012 is to address key areas of our supply chain where we can further influence respect for human rights and help prevent potential abuse.

Labour

We uphold the freedom of association and recognise the right of our employees to collective bargaining and union membership. We have an Equal Opportunities Policy which states our commitment to the elimination of discrimination in respect of employment and occupation. Our Supplier Approval process includes reference to our participation in the UN Global Compact and states our expectation that our suppliers should uphold the freedom of association and the effective recognition of the right of collective bargaining. We operate a Consultation and Participation Procedure which includes an employee suggestion scheme and employee forums. Each employee is paid on a recognised pay structure and holds a Contract of Employment which complies with UK employment law. We undertake Annual Performance Appraisals as part of our Training and Development procedures and we ensure the health and safety of our employees through our Management System which is accredited by the British Standards Institute to BS OHSAS 18001:2007. We were awarded a RoSPA Gold Award in 2011 and it is our aim to win Gold again in 2012.

Environment

We have an Environmental Policy and Management System which aims to ensure that any threats of pollution from its activities are identified and either prevented, eliminated or effectively controlled. We have an Environmental Aspects and Impacts Register and a comprehensive system which is accredited by the



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British Standards Institute to ISO 14001:2004. We operate a Procedure for Legal Requirements and clearly define environmental roles and responsibilities across the organisation. One of our key objectives in 2011 was to reduce our impact on the environment by reducing our carbon emissions by improving the efficiency of our fleet. We have also used new vehicle technologies to benefit the environment by upgrading exhaust systems across our HGV fleet by complying with the London Low Emission Zone regulations. In 2011 we reduced our carbon footprint by 20% as a proportion of hours worked. In 2012 it is our aim to reduce our footprint by a further 5%.

Anti-Corruption

We operate a zero tolerance to corruption, bribery and extortion. We fully support the UN Convention Against Corruption and comply with the Bribery Act 2010. In 2011 we implemented a Bribery Act Policy which was communicated across our business to our clients, suppliers and employees. The policy sets out the Company's and individuals responsibilities and of those working for it and provides information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues. Our Policy and procedures are audited externally by the British Standards Institute in accordance with our accreditation to ISO9001:2008.

Signed 
Position : Managing Director

Name : Neil Coates
Date : 7th March 2012