

GLOBAL COMPACT ANNUAL COMMUNICATION ON PROGRESS – SME VERSION

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|------------------------------|--|----------------------------|------------|
| Company Name: | Baillie Gifford Overseas | Date | 05/08/2012 |
| Unit (if applicable) | | | |
| Address | Calton Square 1 Greenside Row Edinburgh, EH1 3AN | Membership date | |
| Country | UK | Number of employees | 710 |
| Contact name | Richard Gall | Sector | Finance |
| Contact Position | Client Service Manager | | |
| Contact telephone no. | +44 131 275 2822 | | |

Brief description of nature of business

Baillie Gifford is an independent investment management firm.

Statement of support

We support and are committed to the 10 Principles covering human rights, labour rights, the environment and anti-corruption.

Signature



Position

DIRECTOR

PRINCIPLE 1 BUSINESS SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS

Our Commitment or Policy

Our business is situated in the UK and we ensure that our employment conditions and practices comply with, or exceed, UK and EU employment requirements.

A brief description of our Processes or Systems

Policy documents are available to all employees.

Actions implemented in the last year / planned for next year

N/A

Measurable Results or Outcomes

Staff complaints and grievances are at minimal levels. No successful (or unsuccessful) action has been taken against the firm at Employment Tribunal or other Court of Law.

PRINCIPLE 2 BUSINESS SHOULD ENSURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES

Our Commitment or Policy

As Principle 1.

A brief description of our Processes or Systems

Actions implemented in the last year / planned for next year

N/A

Measurable Results or Outcomes

N/A

PRINCIPLE 3 BUSINESS SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING

Our Commitment or Policy

All staff members are free to join a trade union and we ensure that we comply with the UK's Information and Consultation Regulations.

A brief description of our Processes or Systems

N/A

Actions implemented in the last year / planned for next year

N/A

Measurable Results or Outcomes

N/A

PRINCIPLE 4 BUSINESS SHOULD SUPPORT THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR

Our Commitment or Policy

See Principle 1

A brief description of our Processes or Systems

N/A

Actions implemented in the last year / planned for next year

N/A

Measurable Results or Outcomes

N/A

PRINCIPLE 5 BUSINESS SHOULD SUPPORT THE EFFECTIVE ABOLITION OF CHILD LABOUR

Our Commitment or Policy

We support the elimination of all forms of forced and compulsory labour and no forms of forced or compulsory labour exist within the organisation.

A brief description of our Processes or Systems

N/A

Actions implemented in the last year / planned for next year

N/A

Measurable Results or Outcomes

N/A

PRINCIPLE 6 BUSINESS SHOULD SUPPORT THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION**Our Commitment or Policy**

We have an Equal Opportunities Policy which is available to all employees.

A brief description of our Processes or Systems

All staff receive equal opportunities training.

Actions implemented in the last year / planned for next year

The policy is reviewed on an annual basis.

Measurable Results or Outcomes

All issues and complaints are treated with seriousness and professionalism by managers and the HR Department.

PRINCIPLE 7 BUSINESS SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES**Our Commitment or Policy**

We have an environmental policy which is available to all employees.
We have considered ISO14001 certification but have decided not to pursue this for the time being. We feel that we are already implementing good environmental practices within our premises and that the resource required for achieving and retaining ISO14001 at present would not provide any significant additional benefit to our organisation.

A brief description of our Processes or Systems

Purchasing – we aim to purchase products that are recyclable and are from sustainable sources wherever practicably possible.

Waste – we separate all of our waste in order that as much of it as possible may be recycled.

Energy – we restrict office lighting and air conditioning systems to ensure they are only operating during working hours.

Good practice – we provide information in order that our employees may adopt environmentally friendly practices at work and at home.

Actions implemented in the last year / planned for next year

We have recently taken some additional office space, which will help to address any medium term space requirements. As part of our search and selection process, the environmental rating of the building was considered. The new building that we have chosen is B-rated. We are pleased with this outcome, with top rating the in the scale being an A-rating.

Measurable Results or Outcomes

The UK government's CRC (Carbon Reduction Commitment) scheme requires certain organisations to register and report energy usage of their premises. Baillie Gifford liaises with the landlord of our

premises and fellow tenants in order to collate and report this information as necessary.

PRINCIPLE 8 BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY

Our Commitment or Policy

We agree that in the current climate, businesses should promote greater environmental responsibility.

A brief description of our Processes or Systems

Baillie Gifford has a Green Group who considers and implements environmental policy and practices within the organisation. The Group has representation across BG and works with Facilities Management and IT to establish where efficiencies and good practices can be implemented to ensure more efficient working and operational practices within our premises. The Green Group provides information to staff via their notice boards and an internal intranet site.

Actions implemented in the last year / planned for next year

We have been trialling an extended waste recycling scheme, initially in limited parts of our business. Specifically, the initiative involves staff separating rubbish into colour coded waste bins, from which the rubbish can be recycled more efficiently. In addition, standard waste bins have been removed from trial areas, which assists in encouraging sensible disposal of waste materials. We are currently reviewing feedback from participants, following which, consideration will be given to extending the trial to the broader firm.

Measurable Results or Outcomes

The Green Group has implemented good practice. Some examples of such practice would include encouraging staff to recycle, switch off lights and electrical equipment, consider alternative travel arrangements such as car pooling, use video conference facilities, and reduce paper waste via double sided printing and purchase of recyclable stationery products.

For business travel over shorter distances, we regularly use the services of a hybrid taxi company operating here in Edinburgh. We are pleased to utilise this option wherever practicable.

PRINCIPLE 9 BUSINESS SHOULD ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES

Our Commitment or Policy

When appropriate and through our normal business practices, we encourage the development and diffusion of environmentally friendly technologies.

For a case study please see: <http://www.computing.co.uk/computing/analysis/2207256/case-study-baillie-gifford-3737463>

A brief description of our Processes or Systems

We continually monitor the power consumption within our main Datacentre sites. Where possible we reduce the power footprint by employing energy efficient hardware as well as utilising server virtualisation technologies. Server Virtualisation enables us to run multiple servers within a single hardware device, almost a third of our server inventory now uses this form factor.

Where possible we reutilise our IT hardware by cascading equipment to lower process intensive operations. Once this lifecycle has completed we dispose of all of our IT equipment via WEEE compliant vendors.

We use a computerised Building Management System to control the air conditioning and lighting systems more efficiently. Timers are used to ensure the systems are only on during working hours to reduce energy usage. More efficient lighting control systems are being considered to replace existing controls once they reach the end of their expected life. New systems can maximise the use of natural daylight and adjust the lighting accordingly and are more energy efficient.

Actions implemented in the last year / planned for next year

Please see earlier comments on additional office space.

Measurable Results or Outcomes

This is difficult to quantify but we have continued to reduce our power consumption over the last year and are remain committed to looking for ways of reducing our environmental footprint via environmentally friendly technologies where they make financial and commercial sense.

PRINCIPLE 10 BUSINESS SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY **Our Commitment or Policy**

Baillie Gifford is committed to the implementation of measures designed to prevent the possibility or occurrence of corruption in all of its forms. The firm conducts regular training on relevant fraud related matters and operates policies and procedures which are communicated to all staff as part of their induction programme and which are accessible to all on-line. Staff are expected to adhere to ethics policies which cover standards of behaviour in their conduct with other members of staff and with clients and suppliers. In addition personal account dealing rules apply to all staff dealing. These rules require pre-clearance of personal trades and impose conditions on dealing designed to ensure that the interests of our clients are not compromised in any way."

A brief description of our Processes or Systems

N/A

Actions implemented in the last year / planned for next year

N/A

Measurable Results or Outcomes

N/A

How do you intend to make this COP available to your stakeholders?

This will be available to clients upon request.

