

# Communication on Progress

## Participant

- Ignite Europe Ltd.

## Published

- 2013/09/19

## Time period

- 2012/09/01 - 2013/09/01

## Format

- Stand alone document – Basic COP Template

## Differentiation Level

- This COP qualifies for the Global Compact Active level

## Self-assessment

- Includes an explicit statement of continued support for the UN Global Compact and its ten principles
- Description of actions or relevant policies related to Human Rights
- Description of actions or relevant policies related to Labour
- Description of actions or relevant policies related to Environment
- Description of actions or relevant policies related to Anti-Corruption
- Includes a measurement of outcomes
- **Statement of continued support by the Chief Executive Officer**
  - *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.*
- 19th September 2013 To our Clients & Stakeholders, I am pleased to confirm that Ignite 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, Fred Porro Managing Director

## Human Rights

### • Assessment, policy and goals

- *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.*
- Ignite's day to day business operations are designed to ensure that our employees and contractors respect the human rights of each other and the communities

where we work. We also incorporate human rights in our Code of Conduct, where we acknowledge that conducting our business in a manner that respects human rights – as set out in the Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We focus on due diligence and access to remedy, concepts from the UN Guiding Principles on Business and Human Rights. Workers rights We respect the rights of those working for us in line with the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. These include: • freedom of association – employees can join a union wherever permitted by national law; • freedom from discrimination in the workplace, through equal opportunities. • freedom from forced labour; and • the abolition of child labour. We aim to create a workplace that encourages people to make best use of their talents and provides them with flexible working conditions to meet their individual needs Over the past 12 months we have been reviewing our existing processes and practices, with consideration for these principles. We have updated and implemented new policies covering Employee Guidelines and Policy on Business Conduct.

- **Implementation**

- *Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.*
- We have made our employees aware of our Human Rights policy by carrying out training, and providing information via our employee handbook. We have additionally put in place a grievance procedure, and have urged employees to communicate with us with any concerns or suggestions.

- **Measurement of outcomes**

- *Description of how the company monitors and evaluates performance.*
- We hold management meetings on a monthly basis to review our Human Rights & Labour Policies and any suggestions that are made, are logged on a register. We put in place KPI's to ensure that we continually improve our processes and one example of this was to provide all employees with medical insurance whilst at work or on a customer site.

## Labour

- **Assessment, policy and goals**

- *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.*
- Ignite have implemented ISO 9001 Accredited Quality Management System. This not only covers Quality but employee and labour rights. We actively monitor and comply with; Health & Safety Regulations - [www.hse.gov.uk/legislation](http://www.hse.gov.uk/legislation) Environmental Regulations - <http://www.environment-agency.gov.uk/netregs/> Employment law and Information Security Regulations – [www.Direct.gov.uk](http://www.Direct.gov.uk) EU Product Directives -

<http://www.bis.gov.uk/policies/business-sectors/environmental-and-product-regulations> Data Protection Act 1998 Employment Act 2008 Regulation of Investigatory Powers Act 2000 The Computer Misuse Act 1990 Acceptable Usage Policy covering IT access, including internet and email usage from the workplace Disability & Discrimination Act Equality Act Companies Act We have implemented a company policy on the rights of our employees: POLICY ON HUMAN RIGHTS AND LABOUR CONDITIONS

Introduction Ignite is committed to protecting the human rights of everyone who works for the company and all those who have dealings with it. As a responsible company, we support the United Nations Universal Declaration of Human Rights that sets “common standards of achievement for all people and all nations” We recognise that our responsibility for human rights and labour conditions encompasses: Operating sites Supply chain - It is our aspiration that the working conditions throughout our supply chain meet internationally-accepted standards of human rights and working conditions Principles underlying this policy This policy on human rights and labour conditions has been developed with reference to the following documents: • The United Nations Universal Declaration of Human Rights. • The 8 so-called ‘fundamental’ labour standards of the International Labour Organisation. These cover freedom of association; the right to organise and bargain collectively; use of forced labour and equality. • The UN Convention on the Rights of the Child Responsibility We believe that everyone in Ignite is responsible for having due regard for human rights. In particular: • The Directors has overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed. • Managers and supervisors provide visible leadership that promote human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur. • All employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns that they may have about human rights abuses. Effecting action We recognise that from time to time we will encounter challenges on human rights that are bigger than Ignite is able to tackle alone. Many human rights abuses are systemic in their host communities. We are therefore committed to working with other organisations who can help us implement this policy effectively over time.

Policy principles Child labour We will not employ workers under the legal minimum age for admission to work stipulated by the laws of the countries where we work and will operate in accordance with ILO conventions No 138 on the minimum age for admission to employment and No182 on the banning of the worst forms of exploitation of child labour. Forced labour In accordance with ILO Conventions 29 on Forced Labour and 105 on the Abolition of Forced Labour, we will not make any use of forced labour, including prison or debt-bondage labour. We will not require the lodging of deposits or identity papers, either by our operating companies or agencies providing employees. Health and safety We will provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to

anyone on our sites. Regular training to all our workers on health and safety issues will be provided. All workers will have access to bathroom facilities and potable water. Most aspects of health and safety are covered by existing Ignite policies which are available on the Intranet or employee handbook.

**Freedom of association and the right to collective bargaining** We respect the principles of freedom of association and collective bargaining as defined in ILO convention No 87 on the freedom of trade unions and the protection of trade union law and No 98 on the right of organisation and collective bargaining. **Discrimination** In accordance with ILO Convention 111 on Discrimination, we will not discriminate against any person based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age. We will not tolerate sexual or racial harassment or bullying.

Ignite has specific policies on Discrimination/Harassment and Bullying/Victimisation, which are available in the employee handbook.

**Discipline** We will not employ, or allow to be employed, any form of corporal punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through proper procedures. **Working hours**

Working hours in our businesses, including rest days and holidays are informed by the relevant ILO conventions regarding working hours (including No1on working hours (factories); No 30 on working hours (factories and offices); No 47 on the 40-hour week; No132 on holidays with pay) and prevailing national laws. **Compensation** Wages paid for standard working hours must meet local legally-mandated minimum wage levels. However, they must also be sufficient to meet the basic needs of workers and their families. We will work with reputable local organisations to establish what a 'living wage' is. **Responsibility** Responsibility for the compliance of Ignite with this policy lies ultimately with the Directors of the Company.

Performance will be reported to the Board by the Director of Operations.

- **Implementation**

- *Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.*
- We have implemented all policies in our employee handbook. We have also implemented ISO 9001 which encompasses Human, Anti-Corruption & Labour Rights

- **Measurement of outcomes**

- *Description of how the company monitors and evaluates performance.*
- We hold management meetings on a monthly basis to review our Human Rights & Labour Policies and any suggestions that are made, are logged on a register. We put in place KPI's to ensure that we continually improve our processes and one example of this was to provide all employees with medical insurance whilst at work or on a customer site.

## **Environment**

- **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.*

- Sustainability at Ignite Ignite are committed to integrating the key aspects of sustainable development into our operational practices and culture. We seek to be proactive, by considering sustainability issues in all our projects and business activities, and by providing our customers a source of extensive knowledge on sustainability. We have met this responsibility through the implementation of an approved Environmental Management System (EMS), to ISO 14001 & ISO 20121 International Standards. The ISO 14001 & 20121 environmental management system standards provide a framework that ensures that we will conduct our business in a manner that protects the environment, the health and safety of employee's, clients, and the public at our office locations, and at our event sites. Compliance We conduct our business in accordance with all applicable environmental, health and safety laws and regulations, and other relevant standards to which we voluntarily subscribe, and provide the training, management systems, and resources necessary to do so. Health and Safety We foster a culture that makes the health, safety and well being of our employees our number one priority - more important than production, and profits - and provide every employee the absolute right and obligation to question, stop and correct any unsafe act or condition. Corporate Social Responsibility We aim to conduct our business in a socially responsible manner, to contribute to the communities in which we operate and to respect the needs of employees, investors, customers, suppliers, regulators and other stakeholders. Quality Management We aim to provide a professional and ethical service to our clients and endeavour to deliver our services to specification and on time. Pollution Prevention We include pollution prevention and resource conservation opportunities in our business planning and operating decisions to help reduce our impact on the environment. Communications We maintain an open an honest dialogue with our employees and stakeholders about the environmental, health and safety performance of our operations and services. Continuous Improvement We have established key measures to track our performance, set objectives and targets to drive continuous performance improvement, conduct audits and assessments, and promptly correct conditions that we determine threaten human health, safety or the environment. Summary Ignite is committed to sustainable & quality business practices that include compliance with environmental regulations, advancement of environmental awareness, minimisation of environmental risks, reduction of emissions and waste, and conservation of energy and water.

- **Implementation**

- *Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.*
- We have implemented an Environmental Management System accredited to ISO 14001, and an event management system accredited to ISO 20121. Our

environmental programme is managed by our Financial Director, with support from our Operations Director. We have in place an employee training programme on our environmental impacts and aspects and how to minimise these. We have implemented a number of Environmental Action Plans that cover the following areas: Recycling

1. New signage clarifying what can be recycled and how so that all staff are enabled to recycle
2. Recycling bins to be placed in all locations including kitchens, training suite, toilets, offices to ensure that all recycling materials are collected appropriately
3. Use council recycling services for furniture, computers (or preferred provider as required) in order to ensure that all materials are recycled appropriately
4. Cooperation with local businesses to share contacts and learn from other experiences

Waste

5. We measure % of waste sent to landfill at each office location. Office manager to monitor information monthly using waste transfer notes produced by waste carrier. Logged onto a spreadsheet and results reviewed at management meetings
6. Set all printers to default lowest impact options (B&W, 2 sided etc.) to save energy and monitor improvements via spreadsheet – policy needs to be put in place – limited, reduced
7. Printer settings re: emails (so one section can be printed rather than the whole email) to reduce paper usage and monitor changes via spreadsheet
8. Awareness raising about unnecessary printing practices to reduce paper usage and monitor changes via spreadsheet
9. Email ‘Think before you print’ footer to remind staff and contacts of environmental impact

Energy

10. Reduce office energy usage by 8% between 1st Sept 12 and Aug 31st 2012. We will monitor all electricity & gas usage (where applicable) for each of our offices and log this information monthly.
11. Measure water usage at all offices against water bills and water saving programme. Initially collect baseline data in 2012 and introduce programmes from Jan 2013
12. Turning off the lights, computers etc when people leave the office to reduce electricity usage and monitor changes via spreadsheet
13. General awareness/training re stationary, energy conservation etc. travel, meetings to encourage staff to participate and support initiative
14. Labeling light switches effectively (off/on/ area applicable) to reduce electricity usage and monitor changes via spreadsheet
15. Review of premises in terms of energy efficiency to reduce electricity, water, gas etc. usage and monitor changes via spreadsheet
16. Switching to ‘eco-friendly’ consumables to increase the positive impact of our recycling scheme and reduce our energy usage
17. Switching to recycled paper; investigate to see whether cheaper in order to promote environmentally friendly printing
18. Switch to energy efficient light bulbs wherever possible to reduce electricity usage and monitor changes via spreadsheet – landlord
19. Buy main stationary items from a list of environmentally friendly products to support environmentally friendly producers with Ignite’s purchasing/procurement priorities
20. Look at the options for implementing a green travel policy
21. Using information above, find a suitable way to reduce Ignite’s carbon footprint

- **Measurement of outcomes**

- *Description of how the company monitors and evaluates environmental performance.*
- Ignite measures our environmental performance through the implementation of Environmental Performance Indicators. The 4 that we have running at the present time are : - Measurement and offsetting of our carbon footprint - Measurement and reduction of energy usage at our offices - Reducing waste sent to landfill at our event sites, and building this in to our planning - Offering our clients sustainable event management We measure our carbon footprint each year, and offset this with a tree planting charity. We have reduced our energy usage at our offices by 18% over the last 12 months, and at our clients sites by 30% by implementing energy saving technologies and strategies.

## **Anti-Corruption**

### • **Assessment, policy and goals**

- *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.*
- Whoever we may deal with, and wherever we may operate, we are committed to doing so lawfully, ethically and with integrity. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated. We must not, and we must ensure that any third party acting on our behalf does not, act corruptly in our dealings with any other person. This anti-bribery and corruption policy sets out Ignite's policies to prevent acts of bribery and corruption. These policies and procedures have been designed to comply with legislation governing bribery and corruption on a global basis. This policy provides guidance on the standards of behaviour to which we must all adhere and most of these reflect the common sense and good business practices that we all work to in any event. This policy is designed to help you to identify when something is prohibited so that bribery and corruption is avoided, and provide you with help and guidance if you are unsure about whether there is a problem and you need further advice. Who this policy applies to The fundamental standards of integrity under which we operate do not vary depending on where we work or who we are dealing with. This policy applies to all Ignite employees (full and part time) and temporary workers (such as consultants or contractors) across the company no matter where they are located or what they do. It is the responsibility of each of us to ensure that we comply with these standards in our daily working lives. This policy sets out a single standard that all employees must comply with, regardless of whether local law or practices might permit something to the contrary. Part of Ignite's commitment to prevent bribery and corruption is to ensure that the people acting on our behalf also do so in compliance with effective anti-bribery and corruption policies. Accordingly, where we engage third parties such as agents, distributors or joint venture partners, we have obligations to complete sufficient due diligence when entering into arrangements to ensure that they are not acting corruptly, and to periodically monitor their performance to ensure ongoing compliance. In

short, if we can't do it, neither can they. Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal), and criminal liability for the individual involved (up to and including imprisonment). Employees will be required to confirm that they have read and understood the policy and that they comply with its terms as part of their ongoing employment assessment processes. In addition, relevant employees will be required to attend training to support the guidance in this policy. What is bribery? Bribery involves the following:

- when a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or
- when a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly). It does not matter whether the bribe is:
- given or received directly or through a third party (such as someone acting on Ignite's behalf, for example an agent, distributor, supplier, joint venture partner or other intermediary); or
- for the benefit of the recipient or some other person.

Bribes can take many forms, for example:

- money (or cash equivalent such as shares);
- unreasonable gifts, entertainment or hospitality;
- kickbacks;
- unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents);
- unwarranted allowances or expenses;
- "facilitation" payments/payments made to perform their normal job more quickly and/or prioritise a particular customer;
- political/charitable contributions;
- uncompensated use of company services or facilities; or
- anything else of value.

- **Implementation**

- *Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.*
- We carry out employee training, and ensure that our staff are aware of our policies and expectations. Bribery is also covered in our employee handbook

- **Measurement of outcomes**

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

We evaluate anti-corruption performance by reviewing policies, directives and processes; top-level commitment; risk assessment; due diligence of business partners; implementation, training and communication; monitoring and review (including reporting mechanisms).