Walkgrove's Communication on Progress – Prepared by Jane Lunt, Business

Development Manager

Period Covered: 15 November 2012 to 15 November 2013

Statement of continued support by the Chief Executive Officer

I am pleased to confirm that Walkgrove Ltd 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.

Sarah Smith

Managing Director

Human Rights Principles

Principle 1: Business 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

Assessment, Policy and Goals

Walkgrove actively supports the Universal Declaration of Human Rights. We will not carry out business with any countries or regimes where flagrant human rights abuses are known, eq torture, politically motivated disappearances etc.

Walkgrove has an *Anti-Harassment and Bullying Policy* and is committed to ensuring that all employees are treated fairly and with respect. Walkgrove will not tolerate victimisation, bullying or harassment in the workplace. Walkgrove also has an *Ethical Policy* which requires that each employee conducts the company's business with integrity, in compliance with applicable laws and in a manner that excludes consideration of personal advantage. We also have a *Corporate Social Responsibility Policy*, which acknowledges that it has social as well as financial accountability, and in such recognises that its responsibilities extend to improving the environmental, social and economic sustainability of all its business operations and processes.

Implementation

As we expand our operations internationally, all efforts are made to ensure that countries we are trading in comply with the Universal Declaration of Human Rights.

Walkgrove has a Grievance Procedure in place and offers mediation to staff as a first stage resolution to any problems experienced in the work place. Staff consultation is run where organisational changes are being implemented to ensure staff are informed and have an opportunity to influence outcomes.

We have published our commitment to the UN Global Compact on our website to reflect our ethical business performance and to engage positively with stakeholders including employees, clients and communities.

Walkgroves Policies, described above, reflect our proactive stance on human rights.

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

Assessment, Policy & Goals

Walkgrove supports the ILO Core Conventions and will not do business with any organisation that uses forced or child labour.

All Walkgrove employees are issued with a contract of employment which clearly states their terms and conditions including pay rates and overtime pay arrangements. All staff are issued with a Company Handbook which includes information on standard terms and conditions of employment, company benefits, company rules, grievance and disciplinary procedures.

Walkgrove complies with all relevant health and safety legislation and provides a range of different safety related training to staff as appropriate to their job role.

Implementation

Walkgrove consults with staff on a continuous basis and has just instituted a Company Review Day where the year is reviewed in terms of what has been achieved and where we want to go.

Walkgrove has a range of Human Resources Policies which support best practice in terms of labour and employment including an Equal Opportunities Policy and a Dignity at Work Policy.

Walkgrove has also just published a Whistleblowing Policy to:

- Provide avenues for Walkgrove employees to raise concerns about malpractice or wrongdoing in confidence and receive feedback on any action taken.
- Ensure that staff receive a response to concerns that are raised and that they are aware of how to pursue them if you are not satisfied.
- Reassure staff that they will be protected from possible reprisals, harassment or victimisation if they make a disclosure in good faith.

Outcomes

Walkgrove has not been involved in any investigations, legal cases or other relevant events related to the contravention of the Global Compact Labour principles.

Walkgrove has not been subject to any health and safety statutory notices or prosecutions in the last year.

Environment

Principle 7: Businesses should support a precautionary approach to environmental changes;

Principle 8: undertake initiatives to promote greater environmental responsibility; and **Principle 9:** encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy & Goals

Being mostly office or home based, the nature of Walkgrove's business makes our environmental impact small Walkgrove has an Environmental Policy which includes commitment to increase the amount of waste we are able to recycle and decrease the amount of waste going directly to landfill.

We have a policy for car-sharing wherever possible and we use tele-conferencing wherever possible.

All toner cartridges are recycled. Printing is kept to an absolute minimum.

Implementation

This year we have set up a waste separation and composting facility. All waste paper is shredded on site and recycled and, on average 'saves' six threes per year according to our supplier.

The nature of our business, ie the design and delivery of bespoke training, puts us in a good position to explain the benefits to the environment that online learning can bring in terms of reducing carbon footprint and we seek to do this wherever possible and deemed to be effective.

Outcomes

Walkgrove has never had a reportable environmental incident and would not expect to given the nature of our operations. We have never been subject to any statutory notices or prosecutions.

Anti-Corruption

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

Assessment, Policy & Goals

Walkgrove is compliant with the Bribery Act and it is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery. Walkgrove supports the UN Convention Against Corruption and does not operate in countries or with organisations who are corrupt.

Implementation

The Finance Director is ultimately responsible for anti-corruption within Walkgrove and our Anti-Bribery Policy sets out clearly exactly what could be considered to be bribery in terms of business operations. The Policy also covers the receiving of hospitality and gifts. All staff have been trained. Walkgrove has also this year reviewed and re-written its Confidentiality and Data Protection Policies which ensure that staff are aware of the need to protect the personal data that we necessarily have access to and which cannot be disclosed either deliberately or

Outcomes

Walkgrove has not been involved in any legal cases, rulings or other events related to corruption or bribery. Walkgrove's financial statements are prepared by our auditors and this is used as one of the methods of identifying any spurious payments which could be related to bribery or corrupt behaviour.