

## **UN GLOBAL COMPACT 2014**

May 2014

To our stakeholders:

I am pleased to confirm that VertaseFLI 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,

Michael Rawdon

Managing Director

## **HUMAN RIGHTS**

VertaseFLI comply fully with and support the Human Rights Act 1998 and the UN's Universal Declaration of Human Rights. VertaseFLI does not undertake business with any countries or regimes where flagrant human rights abuses are known.

VertaseFLI is an equal opportunity employer and is fully committed to a policy of treating all of its employees and job applicants equally. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation.

The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment and bullying based upon age, disability, gender reassignment, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. The Company will not condone or tolerate any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers. We ensure our policy is circulated to any subcontractors/suppliers we work with, reminding them of their responsibilities.

We maintain and review the employment records of all employees in order to monitor the progress of this policy. The results of any monitoring procedure are reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration is given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and employees.

VertaseFLI is committed to respecting the Human Rights of its staff, stakeholders, clients, to whom it provides a service, promoting values such as dignity, respect, fairness, and equality. It will continue to develop policies and practices in accordance with Human Rights Act. We ensure our policy is circulated to any subcontractors/ suppliers we work with, reminding them of their responsibilities.

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## **Implementation**

VertaseFLI has an Equal Opportunities policy signed by the Managing Director and is publicly available, ensuring that no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of race, colour, ethnic or national origin, religious belief, political opinion or affiliation, sex, marital status, sexual orientation, gender reassignment, age or disability. We are committed to ensuring that all employees are treated with dignity and respect. We maintain a neutral working environment in which no employee or worker feels under threat or intimidated.

We ensure our policy is circulated to any subcontractors/ suppliers we work with, reminding them of their responsibilities to the equality of opportunity.

As part of our company inductions, our Equal Opportunities policy is discussed with all employees. Equalities and human rights are also detailed within our employee handbook.

We also ask all employees to complete an equal opportunities monitoring questionnaire upon starting with the Company. Our policy is reviewed annually to measure the effectiveness and implementation of the policy.

## **Measurement/ Outcome**

Our Equal Opportunities Policy has been updated and reviewed by Senior management in May 2013. Our policies will be reviewed and updated if applicable in June 2014.

## **LABOUR**

VertaseFLI supports the ILO's Declaration on Fundamental Principles and Rights at Work. We will not undertake any business with any company who uses forced or child labour.

VertaseFLI understands its commitments to employment law.

VertaseFLI enforces a formal Equal Opportunities policy which states that no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of race, colour, ethnic or national origin, religious belief, political opinion or affiliation, sex, marital status, sexual orientation, gender reassignment, age or disability.

VertaseFLI maintain a detailed Employee Handbook detailing employees rights and responsibilities and benefits. Remuneration is clearly detailed on their Main Terms and Conditions.

## **IMPLEMENTATION**

All VertaseFLI employees are issued with a Contract of Main Terms and Conditions relating to their employment at VertaseFLI. This states their terms and conditions including pay, holidays, etc. Employees are issued with an employee handbook with contains information on the standard terms and conditions of employment, company benefits, standards, grievance and disciplinary procedures, etc.

VertaseFLI employs trained HR personnel experienced in all aspects of Employment law and have access to various publications/ articles etc on employment law.

VertaseFLI has in place a number of policies relation to employment, including maternity, paternity, applying for flexible working, etc.

## **Health & Safety**

Health and Safety is drawn to the attention of personnel in a variety of ways, which include, but are not limited to:

- Company and site induction.
- Written communication – Health and Safety manual, Safety Alert memos, safety quotations.
- Face to face discussion.
- Health and Safety Committee meetings.
- Team meetings/briefings.
- Notice boards.
- Electronic media.
- Employee handbook.
- In-house workshops, seminars and other training events.
- Tool box talks.
- Method statements, risk assessments and COSHH briefings.

Health and Safety Committee meetings are held at least every six months, and attendees are taken from a cross-section of the organisation to ensure a full and adequate representation of the workforce. The agenda includes, but is not limited to the following:

- Operational performance.
- Inspection reports.
- Audit information.
- Accident/incident information.

## **Measurement**

VertaseFLI has reviewed employment law changes over the past year and has implemented any amendments into its policies as necessary, for example VertaseFLI has implemented revised regulations for maternity and paternity leave and has now ensured its policies and contracts are revised to reflect the new changes.

VertaseFLI employees receive an annual appraisal where employees and their Line Managers discuss the past year's performance and developments for the coming year. Any training requirements are identified during these appraisals.

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

## **ENVIRONMENT**

VertaseFLI's core business function and objective is to provide a remediation service that contributes to sustainable development through the sustainable regeneration of contaminated brownfield sites and the prevention of pollution.

VertaseFLI are committed to minimising the sustainability impacts of our activities by utilising our design responsibilities to implement the principles of sustainable remediation. We shall reduce, re-use and recycle waste wherever possible and adopt management practices to contribute towards sustainable future.

We have a dedicated Quality and Environmental Representative and various policies such as Quality and Environmental, and Waste Management and Sustainability. We have an integrated management system dedicated to environmental processes and procedures in the company. Our system is accredited to ISO 14001.

We comply with all relevant environmental legislation, best practice and guidelines.

We measure our sustainability impact, set targets and objectives, monitor our legal compliance, and conduct environmental risk assessments for various works activities.

- Integrated policy (Quality, Health, Safety & Environment) signed by Managing Director.
- Integrated Manual - The Manual defines the policies, objectives and processes to satisfy BS EN ISO 9001: 2008 and 14001:2004 – Quality & Environmental Systems requirements as well as OHSAS 18001 (health & Safety) requirements. It also provides focus, direction and the control mechanisms for VertaseFLI to manage the quality and environmental systems in line with company business objectives. The Management System shall control all VertaseFLI activities.
- Environmental aspects register – monitoring taking into account positive and negative environmental impacts, actual and potential environmental impacts and normal, abnormal and potentially emergency situations.
- Environment legislation register - identified for both office and project based activities. The register identifies all environmental legislation anticipated for remediation and lining activities. The Environmental Legislation Register is reviewed on a periodic basis.
- Environmental Forms as part of Integrated Management System – including environmental inspections, dust monitoring, noise monitoring, odour assessment, etc.
- Construction Phase Environmental Management Plan for each site we work on – includes details on the general management of the site, water management, waste management, dust and air emissions, etc.

## **IMPLEMENTATION**

Objectives and targets are set against business activities that have a significant negative environmental impact. We ensure that contaminated land is remediated with minimal environmental impact, in line with the company's Environmental, Waste & Sustainability Policy.

VertaseFLI objectives are to:

- Ensure compliance with all applicable legislative and other requirements, achieving a target of zero legislative non-compliance.
- Reduce CO2 emissions from company cars.
- Ensure site characterisation is done efficiently and effectively and site works are completed in accordance with specification.
- Increase the reuse of materials and reduce the quantities of waste disposed of at landfill through the implementation of CL:AIRE Definition of Waste Development Industry Code of Practice Project Specific Targets for material reuse and waste disposal.
- To prevent the unintentional release of contamination into the substrata and groundwater. Ensure no environmental harm is incurred from spillages of fuel or chemicals used to remediate contaminated ground. A zero spillage target is maintained through the implementation of operational control procedures and best practice for the storage and handling of fuels and chemicals.

VertaseFLI operate to an Integrated Management System, accredited to ISO 9001, 14001 and OHSAS 18001.

## **MEASUREMENT**

VertaseFLI has not had any environmental incidents within the last year and has not been subject to any statutory notices or prosecutions.

VertaseFLI uses licensed waste companies for the disposal of waste and are registered with a WEEE compliance company for the disposal of waste electronic equipment.

VertaseFLI has a procedure for dealing with accident/ incident investigation as part of its integrated management system. This procedure shall be followed In the event of any Environmental Incidents. This is to ensure that accident/incidents are reported and investigated in accordance with the company's statutory and OHSAS18001 and BS EN ISO14001 requirements. Environmental Incidents shall be investigated by QESH Coordinator.

Our IMS is regularly internally audited (by trained employees) and externally audited by external auditors.

## **ANTI CORRUPTION**

One of the Company's core values is to uphold sound, responsible and fair business operations. It is committed to promoting and maintaining the highest possible ethical standards in relation to all of its business activities. The Company's reputation for maintaining lawful business practices is of paramount importance to it and this policy is designed to preserve these values. The Company therefore has a zero tolerance policy towards any form of corruption, including bribery.

VertaseFLI ensures compliance with anti-bribery laws, rules and regulations, not just within the UK, but also in any other country within which the Company may carry out its business or in relation to which its business may be connected.

VertaseFLI enforces full policies on anti-bribery, corporate hospitality and the receipt of gifts.

VertaseFLI supports the UN Convention Against Corruption.

VertaseFLI has signed the Managing Director, policies on anti-bribery, the receipt of gifts and corporate hospitality.

These policies are included in all employee inductions and are communicated to employees on a regular basis.

The policies:

1. Provide suitable and secure reporting and communication channels and ensures that any information that is reported is properly and effectively dealt with.
2. Create and maintain a rigorous and effective framework for dealing with any suspected instances of bribery or other unethical conduct.

The Board of Directors have overall responsibility for ensuring these policies comply with the Company's legal and ethical obligations, and all Directors, employees and associated persons are expected to adhere to the principles set out in these policies.

Breaches of any of the provisions of these policies constitute a disciplinary offence and are dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the Director, employee liable to summary dismissal.

In the event that someone wishes to report an instance or suspected instance of bribery, they are to follow the steps set out in the Company's Policy. Confidentiality is maintained during the investigation to the extent that this is practical and appropriate in the circumstances. The Company is committed to taking appropriate action against bribery or other unethical conduct. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Company's Anti-Corruption Officer has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They are responsible for monitoring its effectiveness and provide regular reports in this regard to the Directors of the Company.

## **IMPLEMENTATION**

- Training to all Senior Management on the Bribery Act 2010 and its implementation.
- Communication to all employees on Anti-Bribery, Corporate Hospitality, and the Receipt of Gifts policies upon joining the company and throughout employment as necessary.

## **MEASUREMENT**

VertaseFLI has not been involved in any legal cases, rulings or other events relating to corruption and bribery.

Employees are reminded that if in doubt as to what might amount to bribery or other unethical conduct or might constitute a breach of this policy, they should refer the matter to the Company's board or line manager.

Breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the Director, employee liable to summary dismissal.

It is the contractual duty and responsibility of all Directors, Employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected bribery, fraud or corruption in accordance with the procedure set out in the Company's Public Interest Disclosure Policy.

You must immediately disclose to the Company any knowledge or suspicion you may have that you, or any other director, employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company. For the avoidance of doubt, this includes reporting your own wrongdoing.

The Company encourages all Directors, Employees and associated persons to be vigilant and to report any inappropriate conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously.