

08 January 2024

From: **Mohammed Azam**

**Group CEO**

Duster Topco Trading as **Empowering Learning Group**

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To: **Mr. H.E. António Guterres**

Secretary-General

United Nations

New York

NY 10017

USA

Dear Mr. Secretary-General,

I am pleased to confirm that Empowering Learning Group (company registered name, Duster Topco) supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our commitment to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. Empowering Learning will make a clear statement of this commitment to our stakeholders and the general public. This statement is attached as an Appendix to this letter.

We recognise that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (CoP) that describes our company's efforts to implement the Ten Principles. We support public accountability and transparency, and therefore commit to report on progress starting the calendar year after joining the UN Global Compact, and annually thereafter according to the UN Global Compact CoP policy. This includes:

- A statement signed by the chief executive expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles. This is separate from our initial letter of commitment to join the UN Global Compact.
- The completion of the online questionnaire of the Communication on Progress through which we will disclose our company's continuous efforts to integrate the Ten Principles into our business strategy, culture and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,



Mohammed Azam

Group CEO

## UN Global Compact Statement: Empowering Learning

The UNGC is an initiative for companies that are committed to integrating The ten corporate responsibility principles into their business operations and strategies. The principles cover the areas of human rights, labour, environment, and anti-corruption. By adhering to these principles, businesses can help ensure that markets, commerce, technology, and finance develop in ways that benefit economies and societies everywhere. By signing up to the UNGC we have pledged to:

- Making the Global Compact and its principles an integral part of business strategy, day-to-day operations and organisational culture
- Incorporating the Global Compact and its principles into the decision-making processes of the highest-level governance body, i.e. the Board
- Contributing to broad development objectives through partnerships
- Integrating into our annual report (or in a similar public document such as a sustainability report) a description of the ways in which we implement the principles and support broader development objectives.
- Advancing the Global Compact and the case for responsible business practices through advocacy and active outreach to peers, partners, clients, consumers and the public

### Upholding The Ten Principles

Over the last year we have invested in our ESG programme and commissioned an external ESG consultancy to undertake an ESG Review. This process provided Empowering Learning with a thorough understanding of current ESG performance, risks, opportunities and a 12-month roadmap to improve processes and practices.

Below describes the 10 UNGC principles along with our commitments to upholding these:

### Human Rights

- **Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights:**
  - We recognise the critical importance of respecting Human Rights and that the Rights of every individual affected either directly or indirectly by our operations and business partnerships should be protected
  - As a business working in the education industry, we are most notably and actively involved in the promotion of the Human Right to Education
- **Principle 2: Make sure that they are not complicit in human rights abuses**
  - We comply with all required legal and regulatory requirements and comply with International Labour Standards
  - All of our teacher contractors undergo strict vetting procedures in accordance with the Recruitment and Employment Confederation's Safeguarding Children and Safer Recruitment in Education guidelines
  - We have a whistleblowing policy and procedure in place so that individuals can report concerns about the business' activities, including any suspected risks of human rights abuses.

## Labour

- **Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining:**
  - As a business working in the Education Industry, we are aware of the importance of Unions and do not prevent any contractor from joining one – it is a personal decision.
- **Principle 4: The elimination of all forms of forced and compulsory labour:**
  - We recognise the critical importance of eliminating forced and compulsory labour
  - We have a Modern Slavery policy in place and strict controls with regards to checking visas and rights to work in the UK
  - Whilst we do not procure large volumes of items or goods that have a high risk of modern slavery in their supply chains, we do check Modern Slavery statement compliance with large suppliers
- **Principle 5: The effective abolition of child labour:**
  - Children are a crucial stakeholder group affected by our business. We recognise that children are particularly vulnerable and we are advocates for the abolition of child labour globally.
- **Principle 6: The elimination of discrimination in respect of employment and occupation:**
  - We are committed to promoting diversity and inclusion for all employers, workers and applicants and are continuously reviewing our processes, in particular our recruitment processes, to ensure we are avoiding unlawful discrimination
  - Our Equality and Diversity policy is publicly available on our website and details our commitments to not discriminating on the grounds of an individuals 'protected characteristics' as laid out under the Equality Act 2010. These protected characteristics include age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief and sex or sexual orientation.
  - Our Equality and Diversity policy details our processes in place to adhere to the Equality Act and how we expect all of our stakeholders whether they are employees, contractors, workers or partners to behave which is to treat each other with dignity and respect
  - Should any employee or contractor feel that they have been discriminated against, we have extensive policies and procedures in place for grievances to be reported

## Environment

- **Principle 7: Businesses should support a precautionary approach to environmental challenges:**
  - The precautionary approach states that "*where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation*" (Principle 15 of the 1992 Rio Declaration)
  - The key to a precautionary approach, from a business perspective, is prevention rather than remediation
  - Given our business activities are recruitment and training, our environmental impact risks are low. However, we are aware and committed to identifying and limiting our impact on the environment whether it be through our operations or procurement practices

- **Principle 8: Undertake initiatives to promote greater environmental responsibility:**
  - We are aware that the world has finite resources and that we need to limit the resources we use
  - We are committed to reducing our energy consumption, effectively managing our waste to maximise recycling and reducing our carbon emissions related to vehicle use
  - We have assigned an internal 'Green Champion' whose role it is to promote sustainable behaviours at the office such as sharing guidance on recycling
- **Principle 9: Encourage the development and diffusion of environmentally friendly technologies:**
  - Since COVID-19, we have digitised our IT infrastructure and migrated to the Cloud. All processes are now automated and there are no physical servers on site which means that the associated carbon emissions are much reduced
  - We recruit and place teachers for IT technician and Science technician roles in schools who themselves play a critical role in the education of skills for the next generation to develop sustainable and environmentally friendly technologies

#### Anti-Corruption

- **Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery:**
  - Our Anti-Bribery and Corruption policy clearly states that any form of extortion or bribery will not be accepted. We annually review this policy and have a system in place to track any violations.

We recognise that the United Nations Sustainable Development Goals (UNSDGs) are intertwined with the ambition of the UNGC. We support all the SDGs but feel that, as a business, we are in a position to positively contribute to the following:

- Goal 3: Good Health and Wellbeing: Ensure healthy lives and promote well-being for all at all ages
- Goal 4: Quality Education: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
- Goal 5: Gender Equality: Achieve gender equality and empower all women and girls
- Goal 8: Decent work and economic growth: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
- Goal 13: Climate Action: Take urgent action to combat climate change and its impacts

As part of our UNGC commitment, we will report annually on our ongoing commitment and progress towards upholding the principles.

Signed



Mohammed Azam  
Group CEO