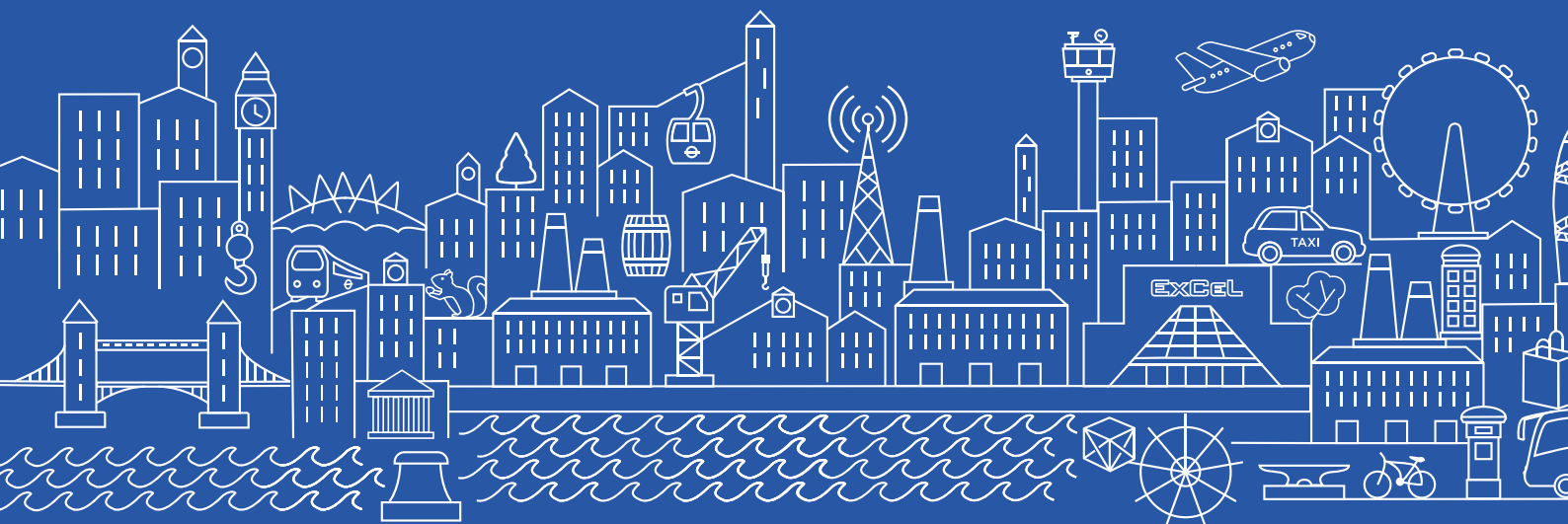


UN Global Compact 2015 Communication on Progress



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01

Statement of continued support

ExCeL London is committed to tackling the challenges of sustainable development and operating as a responsible corporate business.



David Pegler
CEO, ExCeL London

A handwritten signature in blue ink, appearing to read 'David Pegler', positioned below the printed name and title.

ExCeL London is one of the UK's leading international exhibition and conference centres, having hosted all types of events with organisers and visitors from across the globe. We are committed to being thought leaders in our market and to provide world-class facilities and services that are in accordance with our own health and safety policies, this sustainability policy, and ExCeL London's mission statement and core values.

ExCeL London is committed to tackling the challenges of sustainable development and operating as a responsible corporate business. We will implement practices that promote economic security, social and environmental responsibility, and we will continuously seek to improve performance in these areas. We are committed to working with our suppliers and customers to improve sustainability performance throughout all of our activities and are committed to maintain and operate our sustainability management systems in compliance with both ISO20121 and ISO14001 requirements.

This United Nations Global Compact communication on progress is supported by both our Executive Team and owners ADNEC, and will ensure that our set objectives in the areas of sustainability are monitored and measured regularly against our maturity matrix to enable us to continue to improve against our set targets.

All ExCeL London staff are responsible for implementing this policy to ensure that all requirements are being met and for the co-ordination and evaluation of ongoing performance against our sustainability principles, inclusivity, transparency, integrity and stewardship. To deliver this, ExCeL London aims to:

- Ensure the full implementation of this policy throughout all departments, business operations and services, and wherever possible throughout the supply chain.
- Ensure the policy and related sustainability issues are discussed with all employees and ensure all staff are aware of this policy and our 100% commitment to continue measuring and improving our performance.
- Be an industry leader in sustainable development in areas relevant to its business in the events industry; and where appropriate, exceed the basic legislation levels required.
- Work with its clients to pursue, promote and develop sustainable events throughout the entire lifecycle.
- Continue to limit the use of office consumables and waste whilst increasing recycling and the use of more sustainable materials wherever possible.
- Continue a proactive management approach towards the use of energy throughout our venue, management office and other business operations.

02

Key targets for 2015

At ExCeL London, we take every event to heart. Whatever the ambition, we genuinely care about what our clients do and are committed to helping them achieve great things. We work closely to find the right opportunities for growth and encourage our clients to push themselves in new and different ways. This is the standard we set and constantly strive towards, so that every experience we create together is truly impactful.

In August 2007, ExCeL chose to join the UN Global Compact. The ten principles serve as a foundation for the company's CSR plan and are intertwined with a number of company policies and principles.

From our people to our space, we know what it takes to stay ahead, which is why we're always investing in where it matters most so that every event has what it needs to succeed, each and every time. We work with our suppliers and customers to improve sustainability performance throughout all of our activities.

ExCeL undertakes annual audits – both internally and independently – and we are certified to both the ISO14001 environmental standard as well as the ISO20121, which sets sustainability management standards in the events industry.

[Below outlines all of our CSR targets and achievements for 2015.](#)

Page	Target 2015	Status
6	Support 2x charities as part of our CSR programme	Achieved
6	Provide event space free of charge to local and community groups	Achieved
10	Maintain target of 8 accidents or under per 100,000 visitors at ExCeL	Achieved
10	Provide training to staff on how to react in the event of an emergency	Achieved
13	All hazardous waste to be treated separately and correctly	Achieved
13	Correct disposal of CDs, calculators, and batteries	Achieved
16	Reduction in the use of unsustainable suppliers	Not achieved
17	Increase awareness to event organisers of ExCeL's sustainability activities	Achieved
17	Reduction in waste left on-site after events throughout 2015	Achieved
17	Reduce amount of printed collateral and seek to host digitally where possible	Achieved
17	To achieve a 10% reduction in electricity and gas consumption	Achieved

03

Activities cutting across the principles

In 2013, ExCeL redefined a set of core values designed to support our promise to take every event to heart. These values are integrated into the appraisal process and our hiring processes, and they represent our underlying behaviours and the way we do business. They are core to what we fundamentally believe are crucial to our long-term sustainable business success. The four key values are outlined below.

Collaborate

We will share our experience, knowledge, and expertise to tailor and bespoke our solutions to give every event the best possible outcome.

Provide world class facilities

We will continue to invest in our venue and infrastructure to ensure it remains a world-class facility.

Innovate

We will be open-minded and flexible to enable our teams to find the best possible solutions to achieve success.

Provide the best people

We will provide the best people with the experience and knowledge to add value and help our clients deliver successful events.

We aim to win and retain customers by developing and providing products and exceptional service delivery. To enable us to do this we aim to:

- Ensure that all products and services associated with our business are of a strict quality that is in accordance with and aims to enhance our market position and business.
- Develop and maximise the best customer services practices, which set a benchmark for the industry.
- Strive to constantly innovate and enhance our product offering for the benefit of our guests.
- Ensure that our services meet the requirements stipulated by the appropriate regulatory bodies as well as legal requirements.
- Compete fairly and ethically and within the framework of applicable competition laws.

In addition to our brand promise to customers and visitors, ExCeL is committed to operating as a responsible corporate entity and having a positive impact on the area that surrounds us. This means building long-term relationships with local partners in order to deliver long-lasting benefits for our communities. Maintaining an open dialogue with the community is important in shaping the future of ExCeL London and the community in which we operate.

Two major projects which have helped the company forge stronger links in the community are our sponsorship of NASSA (the Newham All Star Sports Academy) and Community Food Enterprise (CFE).

The Newham All Star Sports Academy (NASSA) works with children every week to provide sports coaching, training and after-school activities to help keep them off the streets. The mentoring talks delivered by NASSA under their 'Carry a basketball not a blade' initiative have educated thousands of young people about the dangers of knife crime and gang culture. With the funding that ExCeL provides, NASSA is able to lay on primary and secondary school basketball taster sessions across the borough and subsequently reaches up to 2,000 young people every week. These sessions include mentoring talks from the NASSA coaches about the dangers of knife crime and gang culture. In the 12 months to August 2015, not one young person in Newham has lost his or her life as a result of knife-related violence – a drop

from six in the previous 12 months.

CFE's mission is to work in partnership with the diverse communities of East London to safeguard and sustain their rights to the right food as a fundamental condition for individual and community health and well-being. The core foundations of the project include:

- Nurseries and schools (Breakfast Clubs and Tuck Shops): CFE supports healthy eating in primary schools throughout East London by providing them with a weekly delivery service of fresh fruit for their tuck shops. They also supply grocery provisions for breakfast clubs in infant, primary and secondary schools as well as vegetables for lunches for toddlers in nurseries.
- Community Support Service (CSS): Using their unique infrastructure, CFE supports Community Food Projects (CFPs) throughout East London by providing them with a range of services which includes buying, delivering and sharing resources (e.g. equipment). Without this valuable service, many CFPs would not be in a financial position to provide valuable service to their communities.
- Social Food Outlets (Mobile Food Store): To facilitate and promote healthy eating in areas classified as 'Food Deserts', CFE have developed a Mobile Food Store (MFS).
- Food Waste: CFE uses its infrastructure (vehicles, warehouse space and distribution network) to support the work of the Gleaning Network UK (www.feeding5k.org) by collecting, storing and redistributing produce harvested by them from farms throughout England.

In addition to the above programmes, ExCeL provides complimentary event spaces to selected charities, runs venue tours for schools and colleges and, once a year, runs a week long 'ExCeL in the Arts' camp for around 100 children based in Newham, aged from 11-18. Other notable projects ExCeL continues to support in 2015 are the Ascension Eagles, a local cheerleading squad, and working with two local schools to provide cooking and kitchen space for Newham children.

04 Human rights



Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2

Businesses should make sure that they are not complicit in human rights abuses.

ExCeL London agrees that businesses have a responsibility to respect human rights and act in accordance with internationally applicable standards, such as the UN Declaration of Human Rights. We aim to increase our social responsibility by ensuring that our business processes are sustainable and consider human rights implications.

We ensure that all staff, clients, and visitors are not deprived of their human rights in any way. ExCeL upholds a code of conduct, core values, and a dignity at work policy as part of its overall employee handbook which outlines the steps which all employees must follow to ensure this principle is upheld.

We seek to create an environment which attracts and retains employees of high calibre, and in which employees will feel valued for their contribution to the company's performance. Each team must:

- Implement and observe codes of conduct which are designed to protect employees from harassment or discrimination in any form, and to provide equality of opportunity.
- Ensure that all employees are fully aware of such codes and that they comply with them.
- Operate a remuneration policy that is competitive and rewards good performance.
- Ensure that all employees know what is expected of them in their job, and are able to measure their performance.
- Provide a framework which will assist employees to develop their capabilities.
- Provide a safe work environment for its employees and ensure that employees fully understand their own responsibilities in regards to health and safety matters.
- Aim to develop policies that will support employees in balancing their work and domestic responsibilities.

Although we are owned by international venue development and business management company ADNEC, ExCeL is a UK-based venue and we manage a team of around 197 employees. Almost all hiring opportunities are managed by our HR department, or outsourced to three agencies that assist with indirect hire, chiefly in our Cleaning, Traffic, and Security departments. Each member of staff is subject to right to work checks and we operate PAYE as part of our payroll, to ensure that

all of our employees are legally hired and paid. To ensure ExCeL is not complicit in any human rights abuses, a sustainable procurement policy is in place (discussed further under Environment) when purchasing goods or services with new suppliers.

In addition to stringent checks on our partners and suppliers, ExCeL offers a number of company benefits such as a comprehensive management development programme that will be delivered over the course of 2016 to all Managers and Supervisors. This development programme is intended to support and enhance leadership skills throughout the business, focusing on subjects such as:

- Supporting and motivating employees
- Dealing with and resolving workplace conflict
- Building resilience and stress management
- Effectively managing change
- Coaching individuals in the team

ExCeL benchmarks in the top 10% of employers in the UK for our benefits package, which includes life assurance at four times the employee's salary, permanent health insurance, biennial health assessments, childcare voucher schemes, and other perks designed to improve employee wellbeing, both at work and in their personal lives.

05 Labour



Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4

Businesses should uphold the elimination of all forms of forced and compulsory labour.

Principle 5

Businesses should uphold the effective abolition of child labour.

Principle 6

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

People are our most important asset and we recognise that their health, safety, and welfare, and that of others affected by our activities, is paramount.

ExCeL London is committed to providing safe and healthy working conditions. We respect internationally recognised labour rights standards as set forward by the International Labour Organisation (ILO) and we follow national requirements for labour practices. Our health and safety policy aims to promote a culture where every employee and manager takes responsibility to ensure safe and healthy working conditions via preventative measures and carrying out systematic risk assessments.

As a result, health and safety for both our employees and our visitors forms a crucial part of our sustainable approach. In 2015, we pledged to reduce accidents in the venue to 8 incidents or under per 100,000 visitors and we achieved this. At our last sustainability audit, **the number of incidents per 100,000 visitors was 3.7.**

In addition, to keep our visitors and clients safe during their time at ExCeL, we hold annual emergency procedure briefings which are compulsory for all staff to attend. The emergency procedure briefing enables staff to act efficiently and confidently in the unlikely event of an emergency at the venue, and ensures we commit to our promise of taking every event, and indeed visitor, to heart.

We do not support any form of forced or compulsory labour. All employees have individual contracts detailing their terms and conditions of employment. These are issued prior to commencement of employment. Employees are also issued with job descriptions outlining the details of the work they are being employed to conduct. The company upholds a grievance procedure which can be initiated by the employee with their line manager or human resources. Employees are free to leave the organisation and our leavers' policy outlines clear steps required to resign from employment.

We do not condone any forms of child labour. The company is ISO20121 compliant; part of this process includes ensuring our suppliers are also sustainable, upholding ExCeL's values in relation to social commitment. Additionally, employees of ExCeL are able to enjoy freedom of association

without fear of detrimental implications on their employment. These values are upheld in our equal opportunities policy.

ExCeL is committed to eliminating direct and indirect forms of discrimination in relation to employment and occupation. The company upholds an equal opportunities policy which applies to all aspects of employment including: recruitment and selection, employment opportunity, and promotion decisions. Our equal opportunities policy highlights the expectation that all job applicants and employees are to be treated in the same way, regardless of sex, sexual preference, race, ethnic origin, colour, religion, disability, marital status, or union membership status. To facilitate this claim, all interviews and performance assessments are completed using an integrated competency based framework. This process ensures an objective perspective is taken in relation to all recruitment decisions and places emphasis on the individual's level of skill, qualification, experience, and knowledge.

Due to the nature of our business structure, job vacancies tend to be ad hoc. As such, there are no formal diversity quotas in place when it comes to hiring new employees at ExCeL. We do however have a robust recruitment process, as outlined above, for job vacancies as and when they appear.

Demographics related to our current workforce are detailed below. As shown by our statistics, 40% of our workforce lives in the East London area where ExCeL is based, and in terms of age ExCeL hires quite broadly across several generations.

It's also worth noting that ExCeL has a high staff retention rate, as of January 2016 46% of staff have over five years' service, 27% have over ten years, and 11% have been with ExCeL for over fifteen years. Long service is acknowledged with annual company meetings which celebrate these milestones. The high levels of retention strongly suggest ExCeL is a rewarding company to work for.

ExCeL upholds a dignity at work policy which aims to foster an atmosphere of mutual respect in which staff can feel accepted, able to work with dignity and to their full potential, thus embracing the benefits which diversity can bring.

All of these policies are clearly communicated in our employee handbook and distributed to all staff. The handbook clearly outlines employees' ability to raise breaches of our policies either informally or formally with their line manager or human resources. A formal process is followed if discrimination is suspected or identified; any breach of the policy will result in disciplinary action and may include dismissal.

Whilst we do our best to ensure our managers are well trained and our employees are happy in

the work, we recognise that from time to time, grievances relating to employment may arise. Our policy is to encourage free communication between employees and their managers to ensure that questions and problems arising can be aired and resolved quickly, to the satisfaction of all concerned. We have a comprehensive three-stage process for grievances: informal complaints, formal written complaint, and formal grievance hearing. We also allow an appeals process for individuals that may be dissatisfied with the outcome.

Location	Count of London area	Percentage
Battersea (London)	5	2.54%
East London	80	40.61%
Home Counties	24	12.18%
North London	6	3.05%
North West London	8	4.06%
Paddington (London)	3	1.52%
South East London	24	12.18%
South London	4	2.03%
South West London	6	3.05%
Out of London	37	18.78%
Grand total	197	100.00%

Gender	Count of gender	Percentage
Female	80	40.61%
Male	117	59.39%
Grand total	197	100.00%

Age range	Count of age	Percentage
20-29	38	19.29%
30-39	65	32.99%
40-49	53	26.90%
50-59	33	16.75%
60-69	6	3.05%
70-79	1	0.51%
80-89	1	0.51%
Grand total	197	100.00%

06 Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges.

Principle 8

Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9

Businesses should encourage the development and diffusion of environmentally friendly technologies.



ExCeL London is 100% committed to tackling the challenges of sustainable development and operating as a responsible corporate entity. It is our policy to continuously evolve and implement practices that deliver economic security, social, and environmental benefits.

As one of the UK's leading exhibition and conference centres, we work with our suppliers and customers to improve sustainability performance throughout all of our activities. Over the last two years, we have taken significant steps to deliver and execute a sustainable business strategy for our direct operations, working alongside our clients to pursue, promote, and develop sustainable events.

ExCeL undertakes annual audits – both internally and independently – and we are certified to both the ISO14001 environmental standard and the ISO20121, which sets sustainability management standards in the event industry.

ExCeL's internal Sustainability Committee, which meets quarterly to discuss and monitor CSR objectives, is made up of ten employees from across the company and chaired by an Executive Director. The purpose of this committee is to gain feedback on the status of conformance of the Sustainability Management System to plan arrangements including the requirements of the aforementioned standards.

The checks are designed to ensure that ExCeL's Sustainability System Procedures are being understood, implemented and maintained and that the organisation continues to comply with applicable legislation. The Committee champions and has delivered a number of projects that have significantly reduced the environmental impact of the management office. This has included removing all personal bins and replacing them with separated recycling bins, as well as seeking to reduce printing outputs.

After being successfully re-certified for ISO14001 and ISO20121 at the end of 2014, ExCeL London has continued in our efforts to improve our sustainability performance. In 2015 efforts focused on three key areas: reduced waste, increased energy efficiency and ensuring that organisers participate in our objectives.

Reduced waste

In 2015 we continued with our commitment to reduce waste. To achieve and measure this, we complete monthly reviews of our waste metrics and set annual targets to ensure we are continuously reducing waste. Between January and December 2015, we recycled **2,524.39 tonnes of waste** and created **1,651.90 tonnes of refuse-derived fuels (RDF)** from waste. Overall this represents almost 60% of waste recycled at ExCeL, a target which we hope to improve on next year.

In order to increase positive impacts on reducing our waste, we focused our efforts on continuous training of our staff, particularly our cleaning staff, on waste sorting and correct disposal. Recycling and general waste bins are located throughout the venue and the ExCeL Management Office. All cardboard, plastic, and paper are segregated on-site, with any residual mixed recyclables segregated off-site. At ExCeL, we provide disposal service for our suppliers and retailers on-site by providing the following bins:

- Mixed recyclables
- General waste
- Cardboard and plastic cages – these go to a recycling area where they are baled
- Food bins – for the wormery
- IBC containers – to dispose of vegetable oils and fats

We continue to recycle our waste through our on-site materials recycling facility and the wormery. The wormery is the UK's largest commercial wormery, holding over 300,000 worms. Earthworms are the ultimate recycling machine. The key benefits of our food waste policy include:

- Reduction of carbon emitted by transporting waste from ExCeL
- Reduction in the number of lorries travelling on already congested roads
- Reduction in landfill – volumes have been reduced by approximately 90%
- Production of valuable soil additive, which is then used for landscaping across the ExCeL campus
- Minimal power usage
- Worms can eat almost anything – certain amounts of green waste and paper can also be incorporated

In addition to the food recycling policy, all used vegetable oil is collected from site and turned into bio fuel.

Increased energy efficiency

In 2014, we took steps to improve energy efficiency at ExCeL which included a lighting upgrade throughout our venue and car parks, swapping our 14-year old lighting which was consuming significant amounts of energy for LED eco-friendly lighting provided by Philips. We anticipate that the energy consumption saving per fitting is 70% and we are continuously monitoring effectiveness.

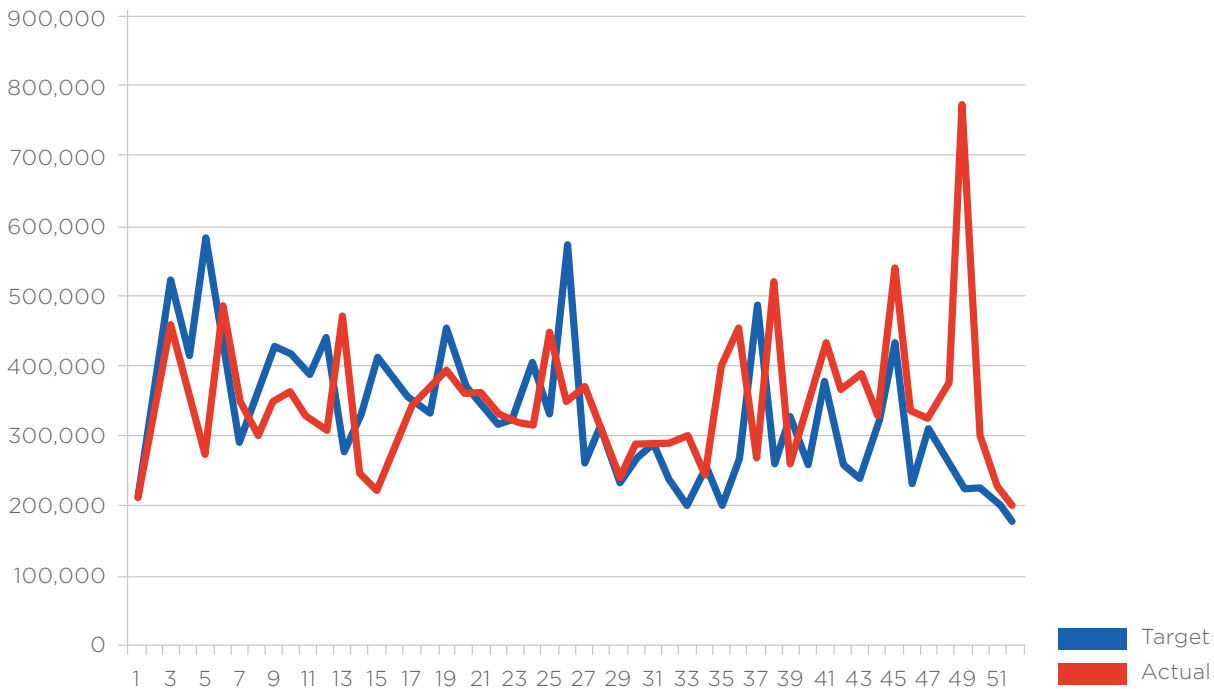
We've taken further steps to increase energy efficiency in 2015 with the following actions:

- Heating/cooling not in use during the build/break of events.
- Lighting set to 50% during build/break of events.
- Staff training and reminders in the office to switch off lights and shut down computers at the end of each day.
- Building Services teams being trained and empowered to make decisions on energy use.

Below are the electricity consumption figures for 2015:

	Consumption KWhrs	Forecast KWhrs	Variance KWhrs	Variance £
Electricity	18,031,811	17,031,946	999,865	99,986

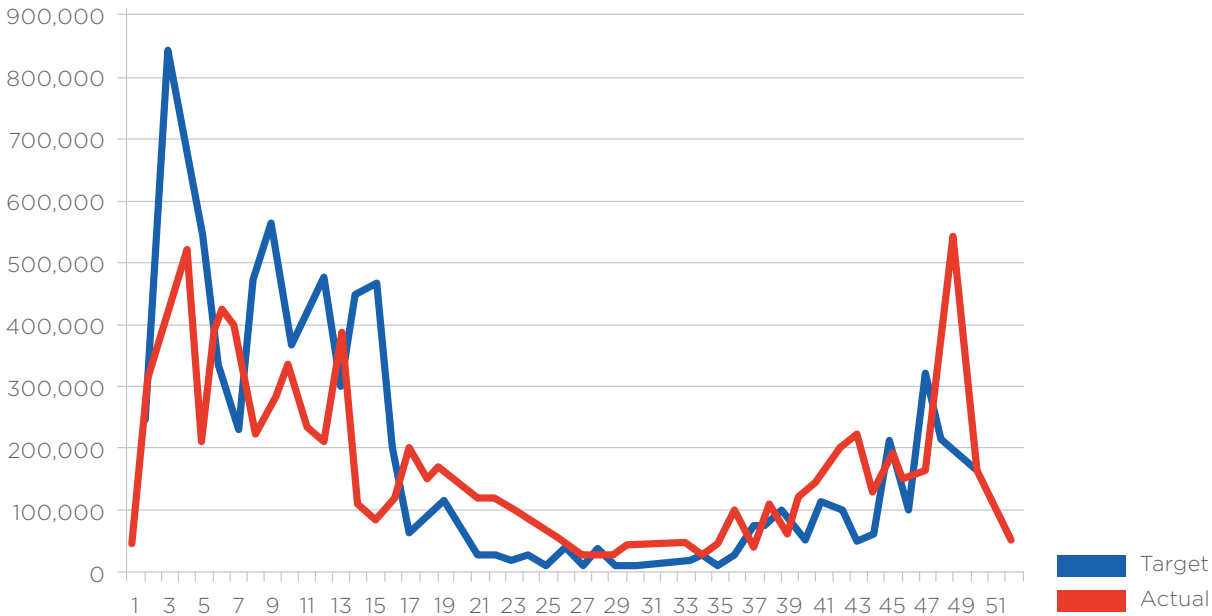
Below is the complete year's electricity consumption summation graph in kwh for 2015 (target) and 2015 (actual).



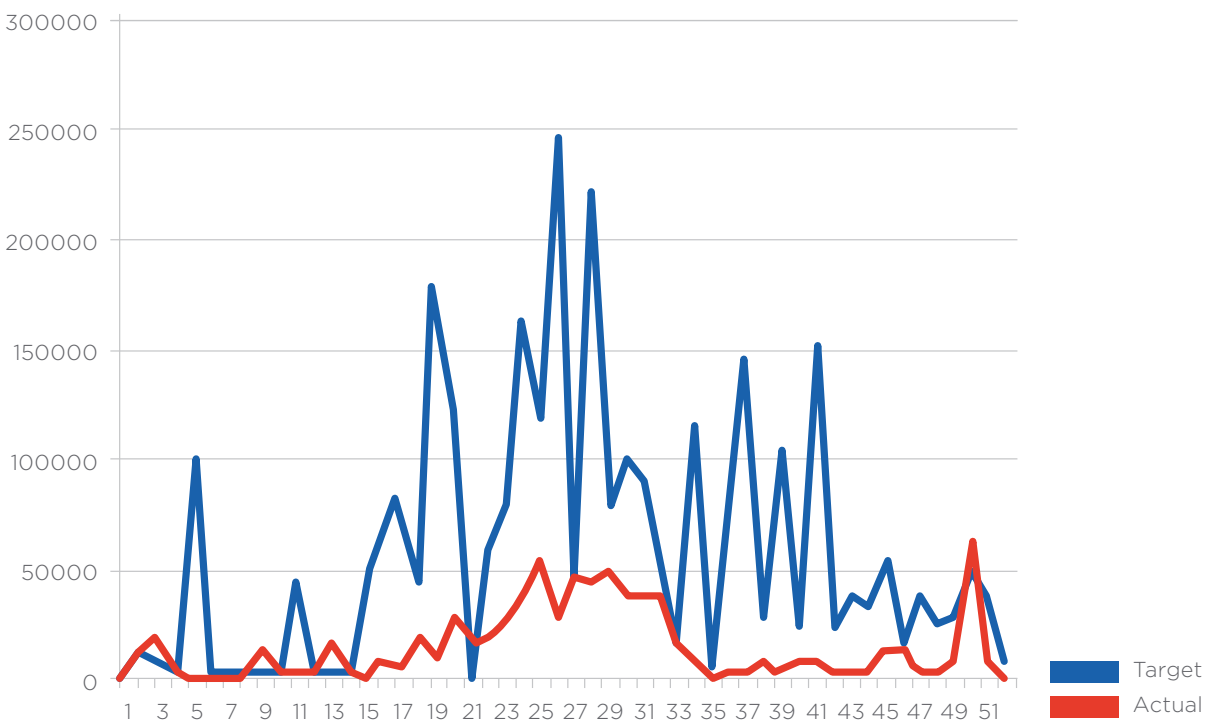
Below are the consumption figures for hot and chilled water for 2015:

	Consumption KWhs	Forecast KWhs	Variance KWhs	Variance £
Hot Water	8,482,889	9,234,006	-751,117	-£30,795.81
Chilled Water	708,249	2,898,900	-2,190,651	-£135,820.36

Hot Water Usage Summation year to date (KWh)

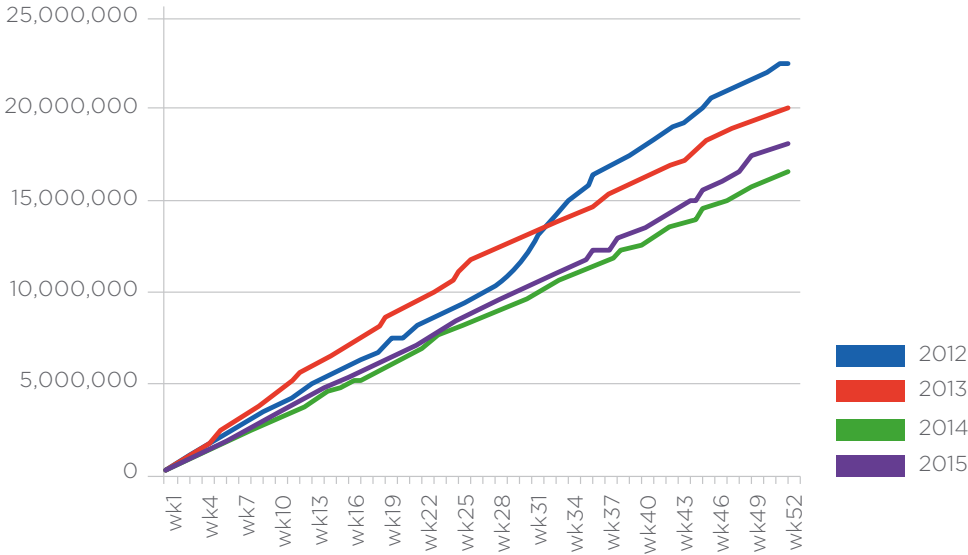


Chilled Water Usage Summation year to date (KWh)

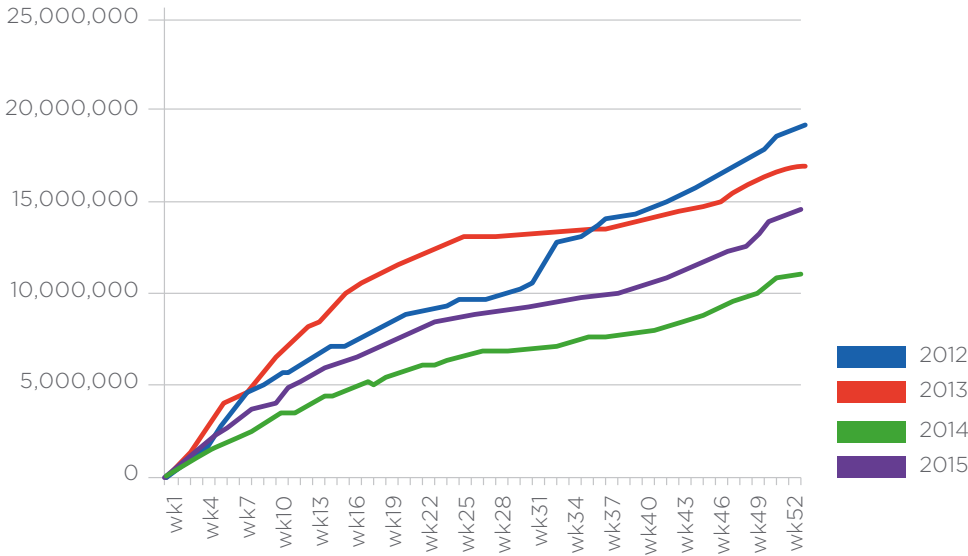


Looking holistically at energy and gas usage at ExCel, please find below year-on-year comparisons.

Electricity consumption year-on-year



Gas consumption year-on-year



One of our stated targets on our internal audit for 2015 was to reduce energy and gas consumption by 10%. As shown on the graphs above, this target was not met. Although we have gone over target for electricity consumption in 2015 we can see from the graph that most of this is directly attributable to very high demand from a particularly prestigious event in December which had a 24 hour tenancy with power, lighting, heating, etc. being used across the 24 hour periods. We were under target for both chilled and hot water consumption for 2015.

Ensuring organisers and suppliers participate in ExCeL's sustainability objectives

The key ingredient to ensure ExCeL's partners and suppliers are aligned with our sustainability objectives is through our procurement policy, which outlines specific criteria to staff when purchasing goods or services. Each departmental director is responsible for monitoring compliance with the policy and ensuring competitive purchasing processes are in place.

Sustainable procurement is a process whereby ExCeL meets its requirements for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment. Cost savings, reduced carbon emissions, less waste, lower energy and fuel consumption, improved health outcomes, more skills and training, plus more contract opportunities for small and medium sized enterprises are some practical benefits to consider and include within procurement.

To be truly sustainable, we also believe our clients should work with us to run sustainable events. It is therefore one of our main goals to ensure organisers are aware of ExCeL's sustainability objectives and that they uphold our energy savings and waste management policies.

Event managers champion this objective as they are the more frequent point of contact for organisers during the planning and delivery process. Sustainability is discussed in the planning process and charges are applied for excessive waste as an incentive to keep events as sustainable as possible. We have noted a

reduction in waste left on-site and sent to landfills thanks to the role ExCeL staff play in educating organisers on their CDM responsibilities. We work in collaboration to ensure all waste is disposed of correctly before, during, and after an event and we provide handbooks to the organisers with guidance.

We measure this objective through organiser feedback surveys completed by an external agency. In 2015 **63% of organisers** stated that they're aware of ExCeL's sustainability activities, and in the coming year we plan to increase this to 70%.

Reduce amount of printed collateral and seek to host digitally where possible

One of our informal goals for 2015 was to continue in our pledge to reduce printing in our management office. As well as notices encouraging staff to print double-sided in black and white only where necessary, our marketing department have actively sought to create digital collateral for organisers wherever possible. The most notable success for 2015 in reducing printing was the introduction of an online marketing toolkit, which is hosted on ExCeL's new website which was launched in summer 2015. The marketing toolkit contains a variety of ready-to-use tools as a downloadable PDF, providing useful information such as travel maps, venue information, key messages and recommended partners. Since launching in June 2015, we estimate around 100 organisers have made use of the marketing toolkit. To date, the landing page has received 1,660 visits, 731 of those which are unique visitors.

07

Anti-corruption



Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

ExCeL London upholds its commitment to preventing corruption of any kind within its code of conduct. In addition, regular internal and external auditing of financial accounts ensures that the company's expectations in relation to corporate governance are maintained.

This auditing also enables ExCeL to achieve our objective of maximising shareholder value, as we must be able to guarantee the highest possible standards of financial management, assessment of risk, and control. We understand that this must be undertaken at every level within the business.

The company has established an audit committee which monitors compliance, full details of their responsibilities can be found in the company's audit committee charter. The remuneration committee makes decisions on executive pay and bonus. External benchmarking of employee salaries removes potential bias and favouritism in annual salary reviews.

ExCeL has not been involved in any legal cases, rulings, or other events related to corruption and/ or bribery. ExCeL aims to conduct its business honestly and in good faith, free from fraud or deception. In order to achieve this, all ExCeL employees must:

- Comply with all applicable UK and EU laws and regulations, including any regulations, codes, and guidelines which apply specifically to the business.
- Not give or receive bribes, or any other inducements to obtain or retain business, nor conduct themselves in such a way as to give rise to any conflict of interest.
- Seek mutually beneficial commercial relationships with third parties with whom they do business.
- Ensure that they do not enter into contractual arrangements that they are unable to fulfil.
- Use company assets only for the purpose of ExCeL's business and not to abuse their position in the company for personal gain.
- Ensure that adequate systems are in place to protect the business' assets.

We strive to ensure that our people act with honesty, integrity, and professionalism. To support these underlying ethical values we encourage our employees to raise genuine issues of malpractice or impropriety at work. By identifying and dealing with concerns at an early stage we can prevent malpractice and take steps to safeguard our

people and protect our organisation.

To this end, ExCeL has a comprehensive whistleblowing policy in place, as well as a whistleblowing hotline which we launched in May 2015. Our whistleblowing hotline is managed by external company Expolink, who will forward concerns – anonymously if desired by the individual – to an internal audit manager. This whistleblowing hotline is global, enabling our visitors, suppliers, and partners to raise their concerns from a number of locations around the world. To this date, we have received zero calls to our whistleblowing hotline.

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. Our anti-corruption and bribery policy, detailed in full in our employee handbook, applies to individuals working at all grades and levels.

Our policy does not prohibit normal and appropriate hospitality (given or received) to or from third parties. We appreciate that the practice of giving business gifts varies between countries and regions; our employee handbook outlines what is considered acceptable and what is not.

Another way in which we strive to prevent corruption and bribery of all forms is through our bi-annual employee appraisals. In these appraisals, employees are asked to declare any gifts made to clients so this can be logged and monitored for any discrepancies. All employees are asked to declare and keep a written record of all hospitality or gifts accepted or offered, which are subjected to this bi-annual managerial review. There is a **100% completion rate** of appraisal forms at ExCeL, and HR follow-up personally with any incomplete responses regarding anti-corruption and bribery.

Employees are also asked to ensure all expenses claims relating to hospitality, gifts, or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for this expenditure. Training on this policy forms part of the induction process for all new employees. Our zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them – and as appropriate thereafter.