



Communication on Progress

October 2015 to October 2016

Prepared for:



United Nations
Global Compact

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Document Owner

All enquiries regarding the content of this document should in the first instance be directed to:

Naome Harrison
Quality & Compliance Manager
Imerja Limited
Hallmark House
Paragon Business Park
Chorley New Road, Horwich
Bolton BL6 6HG

Telephone: 0870 8611 488
Fax: 0870 8611 489
Mobile: 07795 840 387
Email: quality@imerja.com

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1 Management Commitment

I am pleased to confirm that Imerja Limited (Imerja) reaffirms its support of the ten principles of the Global Compact with respect to human rights, labour, environment and anti-corruption.

The Company's inherent value system and principled approach to conducting business in an ethical manner reflects its commitment to corporate sustainability, and pledge to adopt good practices and deliver on its fundamental responsibilities in areas of human rights, labour, environment and anti-corruption.

Imerja's business strategies, policies and procedures collectively establish a culture of integrity and set the basis for ensuring long term success whilst upholding its basic responsibilities to people and planet.

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 the information with our stakeholders using our primary channels of communication

Yours Sincerely



Ian Jackson
Managing Director
Imerja Limited

2 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 abuse.*

2.1 Policy & Goals

Imerja actively supports the Universal Declaration of Human Right. As far as we are aware, we do not carry out business with any countries or organisations where human rights fail to be respected and unacceptable methods are used e.g. exploitation, torture, politically motivated disappearances, slavery and child labour.

Imerja's operations are in the United Kingdom and comply with the protection offered by legislation in the UK. Our Directors ensure we protect the human rights of our employees through establishing and implementing various policies that support our company values.

Imerja has an Equality and Diversity Policy which provides a working environment that protects the rights of all employees and individuals. The Policy is designed to encourage, value and manage diversity and to ensure everyone is treated with respect and dignity.

The Company is committed to promoting and valuing diversity in all areas of recruitment, employment, training and promotion. It strives to maintain an environment that is based on merit and inclusiveness. It guards against all forms of discrimination and harassment and is committed to ensuring all employees can develop their full potential, irrespective of race, gender, marital status, sexual orientation, disability, age, political opinion, religion, and belief, ethnic or national origin.

Imerja has a Bullying and Harassment Policy and is committed to ensuring that all employees are treated fairly and with respect. Imerja forbids all forms of harassment in the course of employment including that committed by third parties and seeks to ensure that the working environment is comfortable for all its employees.

2.2 Implementation

Imerja has multiple Human Recourse Policies which reflect our pro-active state on human rights. Staff consultations are conducted where organisational changes are being implemented to ensure staff are informed and have an opportunity to influence outcomes. Imerja's Company Handbook covers policies concerning our employee rights which are founded on sound business practice and legislative requirements.

A Grievance Policy provides staff a mechanism to deal with grievances fairly and speedily.

Every effort is made to ensure where procurement partners are located comply with the Universal Declaration of Human Rights. We evaluate all partners and suppliers against a set of defined principles, policies and guidelines.

2.3 Measurement

All policies are reviewed for suitability, sustainability and effectiveness on an annual basis or sooner should a significant change occur. These reviews are formally recorded.

Imerja has never been subject to any investigation, legal cases or incidents involving Human Rights violations. No other issues have been identified.

3 Labour Principles

Principle 3: *Business 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*

3.1 Policy & Goals

It is Imerja's policy to provide employment, training, promotion, pay, benefits and other conditions of employment without regard to race, gender, marital status, sexual orientation, age, political opinion, religion, belief, ethnic or national origin or disability unrelated to an individual's ability to perform essential job functions. It is also the company's policy to confirm to all employment standards by law.

Imerja re-affirms its support of the International Labour Organisation (ILO) Core Conventions and will not do business with any organisation that uses forced or child labour, and within its own business promotes opportunities for people of all genders to obtain decent and productive work, in conditions of freedom, equity, security and dignity.

All Imerja employees are issued with a contract of employment which clearly states their terms and conditions including pay rates, holidays and sickness entitlement.

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.

Imerja also has a robust induction program which introduces employees into the ethos of the company, including its commitment to Corporate Social Responsibility and the importance of the 10 Principals of the UN Global Compact.

In addition, Imerja provides detailed guidelines on Health and Safety items such as risk assessments, identified hazards and the procedures in place to reduce or eliminate risks.

These policies and procedures are formally accredited by CHAS and SafeContractor which require Imerja to be fully compliant with all relevant health and safety legislation.



3.2 Implementation

Imerja is ISO9001 – Quality Management accredited and has a wide range of policies supporting best practice in terms of labour and employment including; Equality and Diversity Policy, Performance Appraisal Policy and Whistleblowing Policy.

To enable seamless integration of new and emerging standards across the business Imerja has developed an Integrated Management System (IMS) which incorporates all policies, processes and procedures required to support key compliance requirements including ISO9001 and other ISO standards, best practice guidelines and other industry requisites.

Formal IMS meetings regarding all compliance and Health and Safety matters are held bi-annually to review current policies and discuss any issues or concerns.

The meetings are formally recorded and the minutes are available for all to read.

Compliance Review

Management Consultant &
Lead Auditor

- Alcumus ISOQAR Ltd
- ISOQAR, Inc.
- ISOQAR Italy
- Approachable Certification Ltd



"I have worked with Imerja since 2009, both as a lead auditor and independent consultant. Over that time I have seen its approach to compliance mature to support the business focus of working with public sector and other highly regulated industries. It has consistently impressed, investing in its staff and systems to create an environment that encourages continuous improvement. The creation of an integrated management system incorporating all the ISO standards adopted within the business provides a platform from where it can continue to develop and improve, and rapidly extend to include new processes and controls in support of future standards and industry requirements." [Review – Sep 2016]

3.3 Measurement

Imerja consults with staff on a regular basis through: annual reviews where staff are encouraged to define their own objectives and goals, through annual internal staff suggestion surveys where feedback is gathered about various aspects of the business including HR Policies, and through annual company updates where the Managing Director provide an update on the past business year, achievement made and business projection for the following year.

Imerja has not been involved in any investigations, legal cases or other relevant events related to the contravention of the Global Company Labour principle.

Imerja has not been subject to any health and safety statutory notices or prosecutions.

4 Environmental Principles

Principle 7: Business 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.

4.1 Policy & Goals

Imerja is ISO14001 – Environmental Management accredited and has a wide range of policies supporting best practice in terms of environmental management and minimising any adverse environmental impact.

Imerja promotes the use of environmentally sound resources, discourages wasteful and damaging practices and continues with initiatives to promote greater environmental responsibilities through implementation of a detailed and comprehensive Environmental Policy.

Being mostly office based, the nature of Imerja business makes our environmental impacts relatively small however we are keen to ensure continued commitment to internal policies and controls.

4.2 Implementation

In context of our Environmental, Legal and Communication Aspects Policy, environmental aspect and impacts along with company environmental objectives, targets have been documented which are reviewed and audited annually with results reported at the Integrated Management Meetings.

A summary of the Environmental Aspects and Impacts is presented in tabular format on the following page.

4.3 Measurement

In the last year Imerja achieved their target of reducing fuel consumption by 5%. This was achieved by using technologies available to use like conference calling, tele- and video-conferencing and the ability for individuals to home-work.

Imerja 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.

Environmental Aspects and Impacts Table

Activity / Product or Service's	Environmental Aspects	Environmental Impact (Positive and negative)	Control or Influence	Risk Rating	Target	Action taken	Responsibilities
Electrical Usage (Office lighting, air conditioning and IT equipment, kitchen facilities)	<ul style="list-style-type: none"> Air pollution Global Warming Use of ozone depleting substances in air cooling units Electricity Consumption 	<ul style="list-style-type: none"> Increase on co2 produced through generation of electricity Increase in solid waste and water through generation of electricity Depletion of natural resources 	Influence	C4	Energy Management to measure carbon footprint and reduce carbon emissions	<ul style="list-style-type: none"> Natural light favoured where conditions allow. Lights and equipment turned off when not in use. 	<ul style="list-style-type: none"> ALL – To switch off electrical appliances when not in use. MGMT – To consider necessity the need for additional air conditioning in hosting suite areas.
Fuel Consumption (Travel, transportation, generator)	<ul style="list-style-type: none"> Air pollution Possible spills to Land 	<ul style="list-style-type: none"> Increase in Co2 emissions Depletion of natural resources. 	Influence	C4	5% Reduction year on year April - March	<ul style="list-style-type: none"> Car sharing scheme in-place. VC facilities available to all and wider deployment of desktop VC services is being implemented for key staff. Encouragement of culture to use public transport where practical 	<ul style="list-style-type: none"> All – Manage travel arrangements All – Manage diary's for VC MGMT – Manage the car sharing scheme
Paper Consumption (General office usage)	<ul style="list-style-type: none"> Air pollution Water use Gas Emissions 	<ul style="list-style-type: none"> Emissions to Air Landfill space Depletion of natural resources 	Control	C3	Ongoing – Reduction in none recyclable paper	<ul style="list-style-type: none"> Replace paper stocks with recyclable paper. Recycle bins provided for waste paper. 	<ul style="list-style-type: none"> Purchasing – Finance Recycle - Quality & Compliance Manager and Environmental Champion
General Waste Usage	<ul style="list-style-type: none"> Air pollution Water use 	<ul style="list-style-type: none"> Landfill space Emissions to air Emissions to Water 	Influence	C2	Ongoing – Increase of recyclable material.	<ul style="list-style-type: none"> Recycling bins provided in all locations to collect recyclable materials which are disposed of at local recycling facilities. 	<ul style="list-style-type: none"> Recycle - Quality & Compliance Manager and Environmental Champion
Equipment Refresh (redundant kit, new kit and printer cartridges)	<ul style="list-style-type: none"> Air pollution Water use Contamination to Land 	<ul style="list-style-type: none"> Landfill space Emissions to air Emissions to Water Emissions to Land 	Influence	C3	Ongoing – to dispose of all equipment through the correct procedure.	<ul style="list-style-type: none"> Arrangements in place for WEEE disposal of redundant kit and toner cartridges. Asset inventory managed. Equipment redeployed where possible Environmental aspects taken into consideration when purchasing new equipment. 	<ul style="list-style-type: none"> ISOC – WEEE Regulations Quality and Compliance Manager – Toner Equipment redeployment - MGMT Team Purchasing - Finance
Building Maintenance (Interior & Exterior Cleaning, repairs)	<ul style="list-style-type: none"> Water use Energy use Cleaning Chemical use Waste disposal Air pollution 	<ul style="list-style-type: none"> Landfill space Emissions to air Emissions to Water Emissions to Land 	Influence	C1	Ongoing	<ul style="list-style-type: none"> The landlord is responsible for the maintenance of the building however Imerja will highlight any environmental concerns if needed. The cleaners are requested to avoid excess use of cleaning products. 	<ul style="list-style-type: none"> Quality and Compliance Manager to liaise with the landlord
Grounds Maintenance (Landscaping, pesticides and fertilizer, watering)	<ul style="list-style-type: none"> Fuel Use Fertilizer/Pesticide use Yard waste Possible spills 	<ul style="list-style-type: none"> Emissions to air Emissions to Water Emissions to Land 	Influence	A1	Ongoing	<ul style="list-style-type: none"> The landlord is responsible for the grounds maintenance of the building however Imerja will highlight any environmental concerns if needed 	<ul style="list-style-type: none"> Quality and Compliance Manager to liaise with the landlord

5 Anti-Corruption Principles

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

5.1 Policy & Goals

It is Imerja's policy to conduct all of our business in an honest and ethical manner. The company takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery. Imerja supports the UN Convention.

Imerja will uphold all laws relevant to countering bribery and corruption and is compliant with the Bribery Act 2010.

5.2 Implementation

Imerja's Anti-Corruption and Bribery Policy sets out clearly exactly what could be considered bribery in terms of business operation including receiving gifts and hospitality with the Managing Director being ultimately responsible for anti-corruption within the company.

All employees are subject to a robust induction process which covers the Company's Anti-Corruption and Bribery Policy, and all are subject to formal Disclosures & Barring Service checks during their probation and then at regular intervals to ensure the integrity of their background and suitability for employment.

Through ISO27001 internal and external audits, the Data Protection Policy is regularly reviewed with all staff being trained annually on the requirement to protect personal data. In addition, Imerja is reviewing the scope of the recently published international standard for anti-bribery management systems (ISO37001:2016, published 13 October 2016) with a view to incorporating into its existing IMS roadmap for adoption, further strengthening its credentials in respect to non-corrupt and ethical trading.

Imerja ensures that monetary values are checked under the responsibility of the Managing Director with a prior check by the Finance Director.

Imerja will continue to audit our suppliers to ensure they are ethically trading and not involved in any unethical practices.

5.3 Measurement

All Imerja employees go through rigorous checks on induction including proof of citizenship and DBS checks which reduces our exposure to risk of corruption.

Audited accounts are verified by external auditors each year and submitted to Companies House.

Imerja has not been involved in any legal cases, rulings or other events related to bribery, corruption or extortion.