



20.03.2017

Communication of Progress  
*From 21.03.2016 To 20.03.2017*

To our stakeholders:

I am pleased to confirm that *adm Promotions* 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's Ten Principles into our business strategy, culture and daily operations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Justin Barton', written in a cursive style.

Justin Barton  
CEO

# Human Rights and Labour Rights principles

## Principle 1 – 6

**Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;**

**Principle 2: make sure that they are not complicit in human rights abuses**

adm respects and supports fundamental human rights and it continually works to minimise the risk of human rights abuses. adm's Global Employee Handbook sets out certain minimum standards in respect of the human rights of its employees, and its Supplier Code of Conduct sets out its minimum standards in respect of the human rights of supplier employees.

adm has a range of global Human Resources policies designed to safeguard the human rights of its staff, including Equal Opportunities, Harassment and Bullying Policy, Grievance and Disciplinary Procedures, Fair Competition Policy, and Time- Off Benefits (including Compassionate Leave, Religious Holidays, Ceremonies and Festivals, Working From Home and Time Off for Dependents). In 2017, adm intends to commence a full review of its policies to ensure these continue to be comprehensive and also to ensure these are fully embedded in its business through periodic internal communication and training initiatives.

In order to support responsible sourcing by adm and the human rights of its Supplier's personnel, adm requires its Suppliers to sign up to the adm Supplier Code of Conduct which sets out its expectations with regards to Anti-Bribery and Anti-Corruption, Child Labour, Forced Labour and Human Trafficking, Working Conditions, Transparency and Environment.

As adm continues to grow and expand its operations globally, it is committed to ensuring that all staff are aware of and comply with its global policies and procedures (including those which integrate the Ten Principles of the Universal Declaration of Human Right), and that these are consistently applied in its daily operations through effective communication and training.





**Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.**

adm encourages its employees to make use of their rights to associate and bargain collectively (as stated in its Global Employee Handbook), in line with all applicable laws and regulations.

**Principle 4: elimination of all forms of forced and compulsory labor**

**Principle 5: the effective abolition of child labor**

**Principle 6: elimination of discrimination in respect of employment and occupation**

On commencement of employment, all adm employees are issued with a contract of employment detailing their terms and conditions of employment, along with a Global Employee Handbook which sets out further details of adm’s Human Resources Policies and Procedures.

adm’s Equal Opportunities, Harassment and Bullying Policy summarises adm’s strategy for the elimination of discrimination in employment, and highlights that adm bases its decisions on merit and business needs rather than any other potentially discriminatory factor.

In 2017 adm is seeking to expand its Human Resources capabilities and envisages further risk assessment, training and communication initiatives which will further embed these principles in its business culture.

adm does not tolerate any form of forced, involuntary or child labour throughout its business and supply chain. To support this adm requires all its suppliers to comply with its Supplier Code of Conduct and to go through social audits where child labour, forced labour and bonded labour have zero tolerance.

adm is in the process of preparing its annual slavery and human trafficking statement for 2017 (pursuant to the UK Modern Slavery Act 2015) which specifically details the risk mitigation measures that adm has adopted in its supply chain to minimise the risk of slavery and human trafficking. This will be published by adm before end of March 2017.

## Principles 7 – 9

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

**Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility**

**Principle 9: encourage the development and diffusion of environmentally friendly technologies.**

adm has in place a number of policies, as well as operational processes and procedures which, amongst other things, ensures that products are produced in compliance with applicable environmental regulations. For example, in order to support full compliance with the EU chemicals regime REACH (Registration, Evaluation, Authorisation and Restrictions of Chemicals), adm operates a REACH Control Process which must be followed to ensure that products do not contain any of the restricted chemicals as defined by the regulations.

adm also conducts factory surveys as part of the supplier on boarding process, through which it assesses a potential supplier's compliance with the Environmental Management Standard ISO 14001 in order to assess immediate and long term environmental impact of the organisations products and processes.

Once a supplier has been on-boarded, adm carries out Sedex Members Ethical Trade 4 pillar audits, where its ongoing environmental compliance is further assessed.

As adm is an office based organisation its environmental impact is low.

As an additional measure, we have reduced the number of office cars, and encourage our employees to use the public transport as much as possible.

Along with that in order to drive down our energy usage, many of our offices have replaced their bulbs to LED and have set ourselves a target to reduce our energy costs by 4.2% by 2020 (Company CSR Factsheet 2016).





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

adm condemns corruption in all its forms and will not tolerate it in its business or in those we do business with. As such, adm is dedicated to ensuring that its employees, agents and suppliers of goods and services conduct business for and on behalf of the company in full compliance of all applicable laws relating to bribery and corruption.

adm's anti-bribery and anti-corruption policy and its Supplier Code of Conduct outlines the company's zero-tolerance attitude towards bribes and corruption.

In the spirit of reinforcing these principles adm requires all employees, agencies and suppliers of goods or services to complete a declaration of compliance form.

In situations where employees do become aware of alleged infringing actions, this issue must be escalated to management or the legal or HR department (as appropriate) so that any necessary investigations can take place. Such employees' interests would always be protected as set out in adm's Whistleblowing Policy.





