

## COMMUNICATION ON PROGRESS (COP)

### Human Rights

- \* In all facets of society, sustainable solutions are increasingly in demand, and have become a high priority issue for most of our clients. Margins Group is committed to developing, maintaining and supporting a policy of equal opportunities in employment. It aims to create the conditions in which its staff are treated equitably regardless of age, race, colour, nationality, ethnic origin, creed, disability, staff category, sexual orientation, gender, marital or parental status, political belief or social or economic class, or any other criteria that cannot be shown to be properly justifiable.

Margins Group intends to organize programmes and procedures which comply with current and future legislation, ensure that its values and purposes are maintained and enhanced by emphasising equality of opportunity while also sustaining and accepting diversity.

### Labour

- \* Margins Group regards the occupational health, safety and welfare of its Staff as an utmost importance and recognises its duties under the Labour Act, Health & Safety Regulations and other associated regulations.
- \* Our staff receive a high level regular Product Training based on their department and scope of work. All workers have the option to complete an online course which are role specific qualifications (e.g. Project Management, CISA etc) funded by the company. We also provide seasonal natural health information to all staff through regular newsletters and training updates.
- \* We have a staff forum of staff-elected members who meet half-yearly to discuss various issues arising throughout the business – topics are unregulated and range from employment related issues to innovations in processes or products to sustainability initiatives such as support and schemes. Questions arising from the staff forum meetings are acknowledged and responded to by relevant members of the executive/management team.

It is our policy to promote and ensure the highest standards and conditions at our sites in order to minimise risk, prevent injury, and ill health to our employees to minimise property damage, and to protect the general public if they are affected by our operations.

Margins Group believes that all aspects of its own operation should be carried out in such a way as to uphold the highest standards of ethics. It is in this prospect that

Margins Group has therefore adopted an ethical policy that provides a framework for setting and reviewing its ethical responsibilities. ✓

One proactive way to foster the development and engagement of our employees is to seek and welcome their input on key areas related to employee engagement. We do this through a half yearly Employee Satisfaction & Engagement Survey.

## **Environment**

- \* Margins Group believes that all aspects of every operations should be carried out in such a way that will have a minimal adverse effect on the environment. Margins Group has therefore adopted the following environmental policy that provides a framework for setting and reviewing its objectives and targets.

We strive to lead by example by adopting the practises we advise to others. In order to do so, we actively work to minimise the adverse impacts our own operations may cause on the environment by continuously improving the way we conduct business.

## **Anti-Corruption**

Margins Group takes an uncompromising stance on bribery and corruption. The organisation seeks to conduct all its businesses in an honest and ethical manner that is free from any possibility of bribery and corruption. Margins Group has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery.

## **IMPLEMENTATION**

We are currently putting up together our Anti-Bribery and Corruption Policy to ensure best practice. We are continuing the roll-out of Anti-Bribery and Corruption clauses in all of our supplier agreements. We submit audited accounts each year to all stake holders and bankers which are verified by external auditors and this is used as one of the methods of identifying any spurious payments which could be related to bribery or corrupt behaviour.

## **MEASEUREMENT OF OUTCOMES**

The company regularly monitor employees, associated persons and business activities for any form of risks and also communicate such risks to both the involved persons and the authorized bodies. Undertake appropriate due diligence of third parties and associated persons. There is a continuous review of all documentation which details all expenditure where such payments and bribes could be contained.

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In 2017, SabMiller, through its partner, Partner Africa, conducted an ethical audit in our factory and issued positive findings that we are ethical in our operations and therefore qualify to apply as members of SMETA which we are in the process of doing.

Employees were randomly selected by the auditors and surveyed as part of this process.

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