



Communication On Progress (COP) 2019-2020

For the period of 02 July, 2019 to 02 July, 2020

1. Statement of Continued Support By the Chief Executive Officer

June 3rd, 2019

Dear Mr. Secretary-General,

I am pleased to confirm that CBT Nuggets supports the ten principles of the Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our intent to continue to implement those principles. We are committed to making the 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. CBT Nuggets will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the ten principles and support any specialized UN Global Compact issue platform that our company may join at a later date. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the Global Compact, and annually thereafter according to the Global Compact COP policy. This includes:

- A statement signed by the chief executive expressing continued support for the 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 Global Compact.
- A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
- A measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

Sincerely yours,

Dan Charbonneau, CEO
CBT Nuggets



2. Description of Actions

Human Rights: SDGs Addressed: 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 16, 17

- 1. Businesses should support and respect the protection of internationally proclaimed human rights.**
- 2. Make sure that they are not complicit in human rights abuses.**
 - CBT Nuggets' legal team has created and continues to update a "Code of Conduct." It shall be widely shared in our Employee Handbook. We have a private email and chain of command for ethics concerns.
 - CBT Nuggets' HR Department upholds a policy of "Equal Employment," as well as a "Harassment-Free Workplace" policy which ensure that workers are protected from workplace harassment to include physical, verbal, sexual or psychological harassment, abuse or threats, as well as discrimination, confidentiality and non-retaliation against reporting.
 - CBT Nuggets abides by Federal United States Department of Labor Occupational Safety and Health Administration (OSHA) regulations to ensure a safe and hazard free workplace, as well as to provide guidelines for reporting of accidents.
 - CBT Nuggets' philanthropy and Corporate Social Responsibility program, NuggetLove, supports organizations that provide increased opportunities for fair and equitable education, community building and empowerment interventions building safe, suitable and sanitary school, home and community spaces that are free from harassment. NuggetLove currently works with US-based NGO, Drop in the Bucket to provide clean drinking water to communities in Uganda, including a recent project to provide water to refugee settlements in Lamwo. These water projects are gateways to providing equal access to education and the workplace, as well as to providing tools and training for community-based economic development. (SDG 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 16, 17)

Labor: SDGs Addressed: 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 16, 17

- 1. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;**
- 2. The elimination of all forms of forced and compulsory labor;**
- 3. The effective abolition of child labor; and**
- 4. The elimination of discrimination in respect to employment and occupation.**
 - Employment with CBT Nuggets is on an "AT-WILL" basis.
 - CBT Nuggets complies with minimum wage standards, paying competitive wage for job commensurate with experience and education.



- CBT Nuggets offers a comprehensive health and fringe benefit package to each eligible employee.
- CBT Nuggets ensures that employment-related decisions are based on relevant and objective criteria.
- CBT Nuggets has a gender neutral policy for maternity/paternity leave, allowing new parents an equal opportunity to take time off.
- CBT Nuggets' Safety Committee is working diligently to ensure that workers are provided a safe, suitable and sanitary work facility.
- CBT Nuggets abides by Federal United States Department of Labor Occupational Safety and Health Administration (OSHA) regulations to ensure a safe and hazard free workplace, as well as to provide guidelines for reporting of accidents.
- CBT Nuggets' philanthropy and Corporate Social Responsibility program, NuggetLove, supports organizations that provide improved access for disadvantaged populations in regards to education and workforce to include supporting projects that expand opportunities for women in business, educational equity for girls, and advocacy against violence and harassment against women and girls. NuggetLove facilitates the donation of free trainings to displaced workforce and military service people who are separating from the service and plan to pursue careers in IT.

Environment: SDGs Addressed: 3, 6, 11, 12, 13,

- 1. Businesses should support a precautionary approach to environmental challenges;**
- 2. Undertake initiatives to promote greater environmental responsibility; and**
- 3. Encourage the development and diffusion of environmentally friendly technologies.**
 - CBT Nuggets takes measures to avoid environmental damage via regular maintenance of production processes and environmental protection system (air pollution control, waste, water treatment, food safety, zero or low waste lunch service, etc.)
 - CBT Nuggets uses reuseable, recycled, compostable and recyclable products wherever possible and feasible. Onsite recycling and composting receptacles are placed throughout the building and employees are highly encouraged to make environmentally friendly choices in regard to resource usage and waste responsibility.
 - CBT Nuggets complies with Federal United States Department of Labor Occupational Safety and Health Administration (OSHA) regulations to ensure emergency procedures to prevent and address accidents affecting the environment and human health.



- CBT Nuggets' philanthropy and Corporate Social Responsibility program, NuggetLove, supports organizations that provide water, health and sanitation interventions. Furthermore, our employees gather to volunteer with local environmental advocacy nonprofit organizations such as the McKenzie River Trust.

Anti-Corruption: SDGs Addressed: 16, 17

1. Businesses should work against corruption

- CBT Nuggets is proactive in assessing the risk of corruption/unethical behavior/piracy when doing business along our value chain.
- CBT Nuggets mentions "anti-corruption" and/or "ethical behavior" in contracts with business partners.
- CBT Nuggets ensures that internal procedures support the company's anti-corruption, ethical behavior and anti-piracy commitment.
- CBT Nuggets' philanthropy and Corporate Social Responsibility program, NuggetLove, supports organizations that ensure that internal procedures support the company's anti-corruption, ethical behavior and anti-piracy commitment.

3. Measurement of Outcomes

- Demographics of management and employees broken down by diversity factors (gender, ethnicity, age, etc) as per our Affirmative Action Plan.
- Percentages of employees that participate in sustainability measures to include recycling and composting.
- Evaluation of sustainability measures and new opportunities to provide a more earth-friendly work environment.
- Real-time tracking of potential piracy and unethical behavior both internally and externally, to include internal adherence to acceptable use of company owned computers and cellphones.
- Monitoring and Evaluation of supported philanthropy program interventions and projects.
- Employee volunteer participation surveys track where, when and how many hours our workforce provides service to nonprofit organizations.