



ECORYS  | **90** Years Answering tomorrow's challenges today

Communication on Progress 2020

UN Global Compact

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1.0 Statement of continued support by the Ecorys UK Managing Director

Ecorys UK Limited is pleased to submit its Communication on Progress (COP) for the period June 2019 – June 2020 and hereby reaffirms its support and commitment to the Ten Principles of the United Nations Global Compact on Human Rights, Labour, Environment and Anti-Corruption.

We continue to commit to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engage in collaborative projects that advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

In accordance with our Letter of Commitment, our Communication on Progress describes our company's efforts to implement the Ten Principles and provides examples of our work in support of our vision to be a leading international research and consultancy company, addressing society's key challenges.

We also renew our commitment to report annually on our progress and thereby support public accountability and transparency of our organisation. We shall continue to submit:

- ▶ A renewed statement signed by the Managing Director expressing continued support for the UN Global Compact and our ongoing commitment to the initiative and its principles.
- ▶ 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 UN 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,



Mr. Darren Jackson

Managing Director

2.0 Introduction

2.1 About Ecorys UK Limited

Ecorys UK Limited (Ecorys) is an international provider of research, consulting, programme management and communications services. We combine our passion and our business professionalism to make a difference in the world and address society's key challenges.

Our vision is to be a leading international research and consultancy company, addressing society's key challenges.

Our mission is to help our clients make decisions, build capacity to implement and communicate change, and deliver bespoke services.

With over 550 employees from over 40 nationalities, speaking over 20 different languages, we provide our clients with valuable support to meet their needs. We have worked in over 150 countries on 5,000+ contracts.

We value our independence, our integrity, our partnerships, and care about the environment we work and live in. We have an active Corporate Social Responsibility (CSR) programme across our offices, which centres on creating shared value that benefits society and business.



Who we are

Leading international research & consultancy company, addressing society's key challenges

What we do

We help clients make decisions, build capacity to implement and communicate change, and deliver bespoke services

What we offer

Research and analysis, strategy and policy, evaluations and monitoring, capacity building and implementation, services delivery

What we know

Economic growth, social policy, natural resources, regions and cities, transport & infrastructure, public sector reform, security & justice

2.2 Ecorys and the SDGs

We understand that the strategy of the UN Global Compact is to drive business awareness and action in support of achieving the Sustainable Development Goals by 2030. The services that Ecorys delivers contribute to this ambition. Some examples of this contribution are highlighted below:

SDG 1: End poverty in all its forms everywhere

In Bangladesh, we implemented the £83m Economic Empowerment of the Poorest fund on behalf of the UK Government that lifted 1m people out of poverty. At present we are implementing the Technical Assistance to Support Social Security Reforms programme that will strengthen the Government of Bangladesh's capacity to manage the social security system, with renewed emphasis on social assistance to pregnant women and children under five.

SDG 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture

We are implementing programmes in Zambia and Sri Lanka that seek to build government capacity to implement policies that will promote sustainable agriculture.

SDG 3: Ensure healthy lives and promote well-being for all at all ages

In 2020, we published the results of our study for Surrey Young Carers to understand the numbers of young carers identified in Surrey Schools. Our findings emphasised the need to identify and support young carers, particularly in the current climate, as wider research has found that young carers can face social isolation.

SDG 4: Quality education

Ecorys UK forms the UK National Agency for the Erasmus+ programme, the EU's flagship programme to support education, training, youth, and sport in Europe. Together with our partner the British Council, we will have disbursed €1billion of educational mobility and research grants to universities, colleges, schools, and youth organisations by 2021.

SDG 5: Achieve gender equality and empower all women and girls:

In Zimbabwe, we are implementing DFID's £12million Stopping Abuse and Female Exploitation (SAFE) programme, for the prevention and response to gender-based violence (GBV) through community-level programming.

SDG6: Ensure availability and sustainable management of water and sanitation for all

We are providing Technical Assistance to the Rural Water, Sanitation and Hygiene (RWASH) Division and the wider Environmental Health Division within the Ministry of Health and Medical Services in the Solomon Islands.

SDG 8: Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all

In Laos, we are managing the Business Assistance Facility (BAF) for the World Bank, to support private sector companies and SMEs to build their skills and expertise so that they can become locally, regionally, and internationally competitive.

SDG 15: Protect, restore, and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

In Namibia, we are providing Technical Assistance on the Enhancing Participatory Democracy in Namibia (EPDN) project for the EU, where we are building capacity for CSOs working in education and rural development, to engage with the Namibia National Assembly in the national development process.

SDG 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable, and inclusive institutions at all levels

In the Western Balkans, Ecorys is providing Monitoring, Evaluation, and Learning services to the UK's Conflict, Stability, and Security Fund (CSSF) for the Foreign and Commonwealth Office (FCO), a large component of which includes support to the Rule of Law.

2.3 About the United Nations Global Compact

The United Nations Global Compact is the world's largest corporate sustainability initiative.

It represents a commitment from companies to align strategies and operations with universal principles on human rights, labour, environment, and anti-corruption, and take actions that advance societal goals. Over 9,500 companies are involved and are based in more than 160 countries, both developed and developing, representing nearly every sector and size.

The ten universally agreed principles are:

Human Rights

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

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

Labour

Principle 3: Businesses 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.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

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

Anti-Corruption

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

3.0 Human Rights

3.1 Principles

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

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

3.2 Practical actions

Ecorys UK is committed to upholding human rights both within our company and in the work that we do to make a positive impact on society. We therefore attach great importance to our reputation for conducting business with integrity and fundamentally, with respect to the interests of those our activities may affect. This reputation is an asset, as real as our people and brands. We aim to run a profitable business and that means investing for growth and balancing short term and long-term interests. It also means caring about our customers, employees, shareholders and suppliers, and the communities in which we conduct our operations. To meet our business objectives, we consider it essential that all employees understand and comply with our values and therefore share the Ecorys UK way of doing things. This includes:

- ▶ Conducting business with honesty and integrity and with respect for the interests of our stakeholders
- ▶ Complying with the laws and regulations of the countries in which we operate whilst also ensuring that we respect and uphold fundamental human rights conventions and protections
- ▶ Ensuring that our compliance teams operate to the highest standards of honesty and transparent behaviour and that these values are engaged with and adhered to across all our operations
- ▶ Ensuring that our employees are recruited employed and promoted on the sole basis of their qualifications and abilities needed for the work to be performed
- ▶ Commitment to provide safe and healthy working conditions for our employees worldwide
- ▶ Maintaining good communications with our employees through our company communication channels, tolls, and consultations procedures

In reflection of the values and commitments outlined above, we have put several measures into our company practice:

- ▶ Ecorys UK believes in operating a fair, objective and legally compliant recruitment process at all times. All employees engaged in the recruitment process must comply with our **Equality and Diversity policy**. To support disabled candidates, Ecorys UK will always consider making reasonable adjustments to the job description, person specification, selection criteria, and hours of work
- ▶ When recruiting employees, we follow a diligent reference process – we check with previous employers to ensure that CVs are accurate
- ▶ Ecorys UK ethical policies are outlined in our **Code of Business Ethics and Conduct**. Compulsory training is provided to all staff on this Code upon joining, with refresher training every three years
- ▶ Our inductions to new starters include briefing staff on our policies related to Safeguarding Vulnerable People and Modern Slavery, Health and Safety, and Equality and Diversity. Our Safeguarding Policy makes clear that

safeguarding means protecting people's health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect. We reinforce this knowledge through e-learning modules which are periodically updated.

- ▶ We have an active Works Council that is formed of representatives from all our divisions who meet on a two-monthly basis. The Works Council provides confidential advice to employees and addresses grievances, which are (confidentially) reported to the Managing Director and HR Director
- ▶ We have strict safeguards to data collection, processing, and protection of both staff and external candidates' personal information. These safeguards are set in our **GDPR Privacy Notice for Employees** and **GDPR Privacy Notice for Candidates** and are regularly monitored by our Compliance Manager.
- ▶ In 2013 the board of Ecorys UK committed to donating 1% of its annual profits (before tax) to a charity chosen by our employees. Our CSR work is important to us and we are proud to have continued to make this donation every year since. We have over the last 5 years contributed a total of £55,000 to charity through our corporate donations and wider fund raising

These principles and values are also cascaded to our delivery chain partners through our **Code of Conduct** and associated policies (mentioned above) which form part of our conditions of contract. We undertake due diligence on our delivery chain partners to assess their commitment to high standards in: tax and financial management; prior performance, control and assurance; compliance with the DFID Supplier Code of Conduct; prevention of Modern Slavery; Protection of Vulnerable Persons; Sexual Exploitation and Harassment; Occupational Health and Safety; Membership of the UN Global Compact; Transparency; Conflict of Interest; Data Security; Recruitment and Procurement; and Environmental Safeguards.

Ecorys' work on the EU Regional Trust Fund (The Madad Fund)

Since May 2017, Ecorys has been supporting the European Commission by highlighting the role of the Fund, together with EU Member States, in supporting people displaced by the Syrian crisis and host communities (particularly children and youth), to access healthcare, educational and economic opportunities, across the region.

Using a range of tools from publications and videos to exhibitions and events, both in Brussels and in the region, we are highlighting the real-life impact of the support provided by the EU in response to the crisis

3.3 Measurement of outcomes

Outcomes	Progress update
<p>1. Ensuring that all our policies relating to human rights, safeguarding, due diligence, data protection, equality and diversity, code of conduct, and business ethics are included in the induction of our new employees</p>	<ul style="list-style-type: none"> ▶ Our induction trainings include policies on safeguarding, modern slavery, health and safety, and equality and diversity ▶ We have added new e-learning modules on bullying and harassment, equality and diversity, and sexual harassment ▶ In the past 12 months, we have conducted face-to-face training on Safeguarding
<p>2. Ensuring that all our policies are written in a clear, concise, and accessible format</p>	<ul style="list-style-type: none"> ▶ Together with the Works Council and Human Resources, we are currently reviewing our policies on Conflict of Interest and Code of Business Ethics and Conduct
<p>3. Regular meetings of the Works Council and reports to senior management on views, measures, and progress on actions</p>	<ul style="list-style-type: none"> ▶ Our Works Council continues to meet every two months with the Managing Director and Human Resources Director. The outcomes of the meeting are communicated to our employees. ▶ We maintain a separate Works Council inbox (only accessible by Works Council members) so that our employees may raise concerns in a confidential manner ▶ Though not specifically addressing the UNGC per se, our Works Council address a multitude of topics and implement actions that are wholly in the spirit of the UNGC principles
<p>4. Maintaining a strong due diligence process through scrutiny of responses to our Business Partner Questionnaire</p>	<ul style="list-style-type: none"> ▶ We continue to work with donors such as DFID that require us to maintain a robust due diligence process. We have included details of this in our DFID annual reporting on compliance with the DFID Code of Conduct

4.0 Labour

4.1 Principles

- Principle 3:** Businesses 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.

4.2 Practical actions

Ecorys UK ensures that the views of our staff are represented in many ways including an annual (anonymous) Employee Engagement Survey. In response to our 2018-19 survey, we conducted a series of workshops with employees in all three of our UK offices to discuss the findings as well as the questions posed within it.

The findings of these consultations will be carried forward by our Employee Works Council, which is a group of up to seven employee representatives. Its role is to provide an interface between management and staff through representing staff in discussions with management regarding proposed changes to company policy and operational issues and raising issues with management on behalf of staff.

The Works Council carries out the following tasks:

- ▶ Offering staff the opportunity to raise issues in confidence which the Works Council will then raise with management on their behalf
- ▶ Meeting with Ecorys UK Management every two months and having additional discussions with management as necessary
- ▶ Providing feedback to staff via team meetings and individual contact as appropriate

The Works Council enables us to ensure that our employees have a voice and that they have a stake in determining company policy and improving our practice. We have been working closely with our Works Council colleagues to respond to the Covid-19 crisis and have made the protection of our employees our first commitment. In this regard we have conducted a staff survey to look at the impact of Covid-19 and have enhanced our Employee Assistance Programme through providing access to free information and counselling.

UNICEF Ethiopia contracts Ecorys to study impact of Covid-19 in Ethiopia

UNICEF Ethiopia has contracted Ecorys to assess the impact of the pandemic in Ethiopia with emphasis on the consequences for the country's women and children. Our research includes identifying the population groups who are most vulnerable to the shock and proposing policy recommendations to guide the response to the crisis. We are also mapping opportunities for UNICEF to engage with citizens and decision-makers to put forward an effective, swift, and evidence-based response that keeps the most vulnerable members of society at its core.



4.2.1 Our commitment to preventing Modern Slavery

Ecorys UK maintains a wide set of policies that underpin a safe and trusted environment for our staff, partners, and beneficiaries. This commitment includes our support of the Modern Slavery Act 2015 in all parts of our business services. We have a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to ensuring that modern slavery and human trafficking do not take place within our business or supply chain.

In accordance with this, we have issued the following Policy Statement to our employees and stakeholders:

Ecorys UK Policy Statement on Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners.

Ecorys UK will:

- ▷ Support our staff to be aware of the risks of human trafficking and modern slavery and to act appropriately when any such risk is detected
- ▷ Conduct due diligence on business partners within our supplier chain
- ▷ Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the appropriate authorities
- ▷ Encourage workers to report cases of third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately
- ▷ Positively encourage and support employees and contractors to report such exploitation, which may be occurring within their communities. Points of reference include Line Managers, the Group Compliance Manager and avenues outlined in the Ecorys Whistleblowing Policy

Ecorys UK accepts that job-finding fees are a business cost and will not allow these to be paid by job applicants.

As appropriate, designated managers will attend training on the prevention of labour exploitation who will have responsibility for developing and operating company procedures.

4.2.2 Our commitment to Equality and Diversity

Ecorys UK is fully committed to providing Equal Opportunities and encouraging a diverse workforce, based on the 'Protected Characteristics' outlined in the Equality Act 2010. We have developed an **Equality and Diversity Policy** to assist the company in putting its commitment and values into practice and this is provided to all employees when they join the company. Compliance with this policy is also intended to ensure that employees (particularly those involved in recruitment) do not commit unlawful acts of discrimination. We apply this policy to the process of recruitment and selection, promotion, training, conditions of work, pay and benefits and to every other aspect of employment, including general treatment at work and the processes involved in the termination of employment. The policy also applies to employees, agency workers, suppliers, and freelance workers. We ensure that members of our supply chain are made aware of this policy when prior to engaging with them.

We have also put in a **Grievance Policy** to put these protections into place ensuring that:

- ▶ the company avoids unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy
- ▶ all employees, visitors, contractors, or agency workers are free from bullying and harassment on any grounds and will know that complaints of this type will be dealt with promptly in line with the Grievance Policy. We have clear levels of complaint escalation.

4.2.3 Our commitment to safeguarding children and vulnerable adults

Ecorys UK is fully committed to ensuring that children and vulnerable adults affected by our work are protected. Our policy on safeguarding is about protecting certain people who may be in vulnerable circumstances. A child is defined as someone who has not yet reached his or her 18th birthday. We understand safeguarding and welfare of children as:

- ▶ protecting children from maltreatment
- ▶ preventing impairment of children's health or development
- ▶ ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- ▶ taking action to enable all children to have the best outcomes

A vulnerable adult or 'Adult at risk' is defined as someone with care and support needs who is at risk from abuse or neglect. We intend to ensure a common understanding of safeguarding issues and to ensure that we embed good practice across the diverse and complex areas in which we operate and enhance accountability in this crucial aspect of our work.

We require all organisations and individuals working with, or on behalf of Ecorys UK, whether in the UK or overseas, as partners, or sub-contractors to be familiar with and comply with this policy. Whilst it is recognised that local legislation may vary from country to country, our policy identifies our minimum standards, is based on UK legislation, and may exceed the requirements of local legislation.

Ecorys UK is committed to protecting people who may be unable to protect themselves against significant harm or exploitation. We take all appropriate steps to ensure that all our employees are provided with support to deal with potentially challenging concerns and issues concerning safeguarding, including the following actions:

- ▶ we will undertake appropriate criminal record checks to prevent unsuitable employees working with children and vulnerable adults.
- ▶ all Ecorys UK employees who encounter children and vulnerable adults will have training in handling a disclosure, reporting an allegation, confidentiality, code of practice and code of behaviour. These will include online training tools and induction processes. Existing employees will be made aware of the policy, procedures, and guidance
- ▶ we will ensure that all employees who have contact with Children and vulnerable adults familiarise themselves with the Code of Practice and guidance notes provided under our Safeguarding Policy
- ▶ We will ensure that no research involving, or otherwise engaging, children and vulnerable adults may be carried out without the approval of the Project Director.

4.3 Measurement of outcomes

Outcomes	Progress update
<p>1. Monitoring the Ecorys UK Equality and Diversity Policy periodically by the Company to judge its effectiveness and ensuring that it is updated in accordance with the law</p>	<p>▶ Our policy is reviewed on an annual basis by our HR Manager. The latest review took place in April 2020 and no update was deemed to be needed</p>

<p>2. Monitoring the ethnic, gender and age composition of the existing workforce and the number of people with disabilities within these groups and reviewing its policy in accordance with the results shown by the monitoring</p>	<ul style="list-style-type: none"> ▶ We have been monitoring gender workforce demographics and are currently in the process of expanding this to include other forms of discrimination
<p>3. Undertaking regular training of our staff on safeguarding, prevention of modern slavery and health and safety through e-learning modules.</p>	<ul style="list-style-type: none"> ▶ All new starters and employees are required to complete e-modules on these topics, which are monitored by our Compliance Manager. The completion rates are reported to the Ecorys UK Board of Management
<p>4. Publishing our 2019 Gender Pay Gap statement on our website with associated actions</p>	<ul style="list-style-type: none"> ▶ We have now published our Gender Pay Report which can be found here: https://www.ecorys.com/united-kingdom/gender-pay ▶ To respond to the report findings, we have appointed a Gender Balance Project Team who have created a two-year action plan which they will deliver, monitor, report progress to the Ecorys UK Board, and provide regular updates to the Works Council and staff ▶ As part of the Gender Balance Project, we conducted two virtual workshops with focus on the gender pay gap, career development and leadership from a gender perspective. The discussion with participants touched on issues such as company support for return from maternity leave, menopause, restrictions caused by family obligations, and how Ecorys can offer support ▶ We have introduced Competency Behavioural Interviewing (CBI) across all our recruitment. This has been included in our recruitment policy and our Human Resources team will roll out 'lunch and learn' sessions on CBI interviewing later this year. ▶ We analyse our Reward Panel statistics every March and September to analyse potential obstacles that could affect future promotions

5.0 Environment

5.1 Principles

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

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

5.2 Practical actions

At Ecorys UK we are committed to seeking opportunities to reduce our environmental impact by organising our operations in a sustainable manner and have developed and rolled out an **Environmental Policy**. In accordance with this policy, we publish an annual Environmental Performance Report.

We conform to our compliance obligations by meeting or exceeding the environmental requirements of legislation, regulation, and our adopted standards. This includes:

- ▶ Complying with all relevant environmental legislation
- ▶ Implementing a training programme for our employees to raise their awareness of our policy, procedures and environmental issues and enlist their support in improving our company's performance
- ▶ Encouraging the adoption of similar principles by our suppliers
- ▶ Anticipating environmental issues and taking appropriate actions, which may precede laws or regulations to reduce our impact on the environment in all aspects of our environmental performance
- ▶ Reviewing and auditing our own operations on a regular basis to identify strengths and weaknesses in our environmental approach
- ▶ Supporting sustainable development, the responsible use of natural resources and energy conservation. We will consider potential environmental impact during all relevant business decisions
- ▶ Promoting programmes of waste minimisation and pollution prevention, including recycling
- ▶ Minimising energy wastage by promoting the efficient use of energy, water, and other resources
- ▶ Reducing our carbon footprint
- ▶ Committing to continual improvement in all aspects of our environmental performance



Our precautionary approach to environmental challenges includes ensuring a safe working environment for our employees. Ecorys UK recognises the importance of health and safety in the workplace and its duty to all employees, visitors, contractors and subcontractors under the Health and Safety at Work etc. Act 1974.

Ecorys UK recognises and accept its responsibilities as an employer under the general provisions of the Act, which imposes a duty on all employers to ensure, so far as is reasonably practicable, the health, safety and welfare of their employees at work. The Act also requires that employers ensure the safety of all other persons, who, though not employees, may be affected by their activities. To this end, we will:

- ▶ provide adequate control of the health and safety risks arising from our work activities and maintain safe, appropriate equipment and systems of work and ensure the safe handling and use of materials and substances
- ▶ consult with employees and others as appropriate, on matters affecting their health and safety
- ▶ provide information, instruction and supervision for employees and sub-contractors
- ▶ ensure that all employees and sub-contractors are competent to do their tasks by ensuring adequate training is provided
- ▶ allocate responsibilities and adequate resources for the implementation of the Policy
- ▶ review and report on the implementation of the Policy to achieve continual improvement in the company's health and safety performance.

Our environmental and health and safety policies are communicated to all our employees, suppliers and sub-contractors and is made available to the public. All our personnel understand their obligations under these policy statements and will review these policies on an annual basis.

5.3 Measurement of outcomes

Outcomes	Progress update
<p>1. Publishing an annual Environmental Performance Report, outlining our progress in reducing our environmental impact</p>	<ul style="list-style-type: none"> ▶ At the time of writing, our 2020 Environmental Performance Report is awaiting approval from our Board of Directors
<p>2. Ensuring that our staff are trained on environmental safeguarding and health and safety in the workplace through e-learning modules</p>	<ul style="list-style-type: none"> ▶ We are working towards ISO 4001 accreditation, and will provide training once this is in place ▶ We are also accredited to ISO 9001 with the requirement to demonstrate that we are committed to providing a professional work environment in all our offices, considering personnel safety and wellbeing, facility conditions, equipment, and IT software and hardware, with adequate training and instruction to your employees. This is audited annually by our awarding body
<p>3. Ensuring that recycling is promoted within our offices through clearly labelled bins separating recyclables from general waste</p>	<ul style="list-style-type: none"> ▶ All bins are clearly labelled recyclable and general waste in all our offices ▶ We are in the process of creating posters to encourage greater recycling in the office, though this has been delayed due to the Covid-19 lockdown ▶ We have moved towards using DocuSign (electronic document signatures) for a more secure and environmentally friendly way of signing contracts, thereby saving on paper waste and carbon costs
<p>4. Monitoring energy use in our offices through comparing bills and statements</p>	<ul style="list-style-type: none"> ▶ At present the sharing of office space with other companies makes it difficult for us to monitor energy usage, but we are formulating actions to reduce our energy expenditure through bolstering the objectives of our Environmental and Health and Safety Coordinator

6.0 Anti-Corruption

6.1 Principles

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

6.2 Practical actions

It is the policy of Ecorys UK to conduct all our business in an honest and ethical manner. This is codified in our **Anti-Corruption and Bribery Policy**. We do not tolerate any bribery or corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; together with implementing and enforcing effective systems to counteract bribery. Our policy covers bribes, gifts and hospitality, facilitation payments and “kick-backs” and political donations. Our policy is designed to uphold the requirements of United Kingdom (UK) legislation, principally The Bribery Act 2010 which came into force in July 2011.

Ecorys will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

We have identified that the following are particular risks for our business:

- ▶ Country risks in relation to our International Development Unit, Programme Management, and Communications operations
- ▶ Business opportunity risk due to the number of experts, associates, and contractors with whom we work
- ▶ Business partnership risks in respect of partnership arrangements including consortia and joint ventures

Our Board of Directors have overall responsibility for ensuring that our Anti-Corruption and Bribery Policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Board of Directors have delegated this to a **Compliance Manager** who is responsible for the implementation and monitoring of the policy, and in dealing with any queries on its interpretation.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us including our suppliers. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Our staff and suppliers are made aware that we reserve our right to terminate our contractual relationship with workers or sub-contractors if they breach this policy and compliance with this policy is in our standard terms and conditions for contractual relationships. 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.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. We therefore apply a test in all circumstances to determine whether the gift is reasonable and justifiable. Matters of doubt are referred to the Compliance Manager before acceptance.

Training on this policy forms part of the induction process for all new employees. All existing employees receive relevant training on how to implement and adhere to this policy and must complete an online module on Bribery.

6.3 Measurement of outcomes

Outcomes	Progress update
<p>1. Monitoring the effectiveness of the implementation of our anti-corruption and bribery policy, regularly considering its suitability, adequacy, and effectiveness</p>	<ul style="list-style-type: none"> ▶ In September 2019 we recruited a Contracts and Compliance Manager to monitor and report on the implementation of our policies including anti-corruption and bribery ▶ The Compliance Manager's role includes regularly reviewing our internal control systems and procedures to provide assurance that they are effective in countering bribery and corruption
<p>2. Ensuring that all employees and workers know that they are responsible for the success of the policy and ensuring that everyone understands the importance of working against all forms of corruption, through training and awareness-raising sessions, sharing and creating social media content on the issue.</p>	<ul style="list-style-type: none"> ▶ Our Compliance Manager has started reporting completion rates of e-modules to the Ecorys UK Board which will help bring focus towards 100% completion rates
<p>3. Ensuring that reporting and whistleblowing procedures relating to fraud, bribery and corruption will be dealt with in an effective and confidential manner</p>	<ul style="list-style-type: none"> ▶ We ensure that details of our Compliance Manager and Whistleblowing procedure is clearly outlined in all our Contract Management Plans



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