

## GLOBAL COMPACT ANNUAL COMMUNICATION ON PROGRESS

<b>Company Name</b>	<b>PA Consulting Group Limited</b>	<b>Date</b>	<b>January 2021</b>
<b>Address</b>	<b>10 Bressenden Place London, SW1E 5DN</b>	<b>Membership date</b>	<b>June 2007</b>
<b>Country</b>	<b>UK</b>	<b>Number of employees</b>	<b>3,314</b>
<b>Contact name</b>	<b>Mark Lancelott</b>	<b>Sector</b>	<b>Professional Services (Business Consulting)</b>
<b>Contact Position</b>	<b>Member of PA's Management Group</b>		
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To our stakeholders:

I am pleased to confirm that the PA Consulting Group ("PA") 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 and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Yours Sincerely,



Ken Toombs  
Chief Executive Officer

### **Brief description of nature of business**

PA is a consulting, technology and innovation firm. We define success as achieving exceptional results that have a lasting impact on businesses, communities and individuals worldwide. As an innovation and transformation consultancy we believe in the power of ingenuity to build a positive human future in a technology-driven world.

This principle has remained the cornerstone of our ethos since 1943 - and it continues to underpin everything we do.

Our clients choose us because we challenge convention to find the solutions that really work - in practice, not just on paper. Then we roll up our sleeves and get the job done.

Our 3,314 people are experts in a wide range of industries and we bring in specialists from across our firm to ensure our clients receive the best service. Our specific expertise is in energy and utilities, financial services, health, life sciences, consumer and manufacturing, government, defence and security, transport and logistics.

We operate globally from our principal offices in the US, Europe and the Nordics.

## Statement of support

In our opinion, Corporate Social Responsibility (CSR) comprises environmental, economic and social responsibility. PA's approach to CSR is intrinsically linked to our core business values and we believe that being a socially responsible business makes good business sense. Since 2007 we have been an active participant in the United Nations Global Compact which we believe provides a perfect platform for encouraging and promoting good corporate principles and learning experiences in the areas of human rights, labour, environment and anti-corruption. This Communication on Progress provides an overview of our activities since committing in 2007 to the Global Compact's objectives.

In PA, economic, social and environmental responsibility cuts across everything we do and is enshrined in our processes as good business practice. Our Core Values and Code of Ethics guide our company and we define sustainability through our values which give rise to our policies, our ethics and our corporate culture. They commit our company and every employee to environmental stewardship, safe and inclusive work environments, and socially responsible behaviour in our workplaces and our communities, as well as in the consulting services we provide to our clients. PA is fully committed to this and our approach is embodied in PA's policies, service manuals and business practices handbooks.

We are a major global employer and know that to continue to succeed we must draw employees from a rich and diverse talent pool. We rely on the unique contributions of all types of people from all over the world. By improving our performance in the areas of CSR we will be better able to:

- Build our reputation as an employer, enabling us to recruit and retain the best people
- Increase the engagement of our people, so that they always feel able to recommend PA as a great place to work and willingly go the extra mile for our clients
- Improve our standing with clients and all the wider communities in which we operate
- Develop new and wider capabilities and knowledge within PA.

In the spirit of our purpose, we believe PA's CSR initiatives and corporate structure give our people opportunity to bring ingenuity to life, and to create somewhere we all feel proud to work. These initiatives form a key part of our strategy to become *the* premier consulting firm - a strategy whose success will be based on the unique quality of PA that will be seen both by our clients and our people.

We have been working to align our CSR and Sustainability initiatives more closely with the UN Sustainable Development Goals and looking at where we can align our actions more closely with the Goals. Our Springboard and Giving Back and Volunteering programmes sit within our Inclusion and Diversity strategy, to make a significant contribution towards SDG 10. We have tightened our focus on our Environmental management work, aligning this with goals 13, 14 and 15. Another cornerstone of our work is our ability to form partnerships supporting the aims of the SDGs, as exemplified in our work supporting the UK Ventilator Challenge and (as described below) enabling PulPac to partner with a variety of industry leading firms so that its pioneering paper-based products can displace more single-use plastics more quickly.

### Looking more closely at our initiatives:

**Building an even better place to work:** we are committed to building an inclusive and supportive workplace, where all of our people can excel and bring ingenuity to life every day. We want our people to feel proud to work at PA and make sure we're enabling them to do their best work, so we take an insight-led approach to improving the areas that matter most to them. We regularly measure how our people are feeling about working at PA through our employee engagement survey and other pulse surveys, which enables us to understand the areas we should celebrate and where we need to focus to make it an even better place to work. These insights have helped to inform and continuously improve our inclusion, engagement, and wellbeing strategies and activities.

In 2020, our people told us that they feel able to build strong relationships working at PA and feel able to give and ask for support when they need it. They also told us that they have access to challenging, stimulating work that makes a real difference to our clients and that their developing personally and professionally at PA. They felt that more could be done to support their mental and physical wellbeing, particularly during the COVID-19 pandemic, create alternative career paths, and ensure transparency in our reward and recognition processes, all of which have become key areas

of focus for us this year. Read more about specific steps we have taken this year in 'Actions Taken' against Principles 1 – 6.

**Inclusion and Diversity:** We believe that greater diversity stimulates innovation and creativity, supporting the growth of our people, and enabling us to deliver more enduring results for our clients, and we've made a number of strides in this area in recent years. Our specific Inclusion & Diversity Programme was a firmwide strategic priority for us in 2020, which we will continue to enhance and build on this progress going forward. Our work in this area aims to create a more inclusive environment, which attracts diversity and enables it to thrive. As part of this, we made several firmwide commitments to putting 'Black Lives at the Heart of Inclusion', refreshed the way we collect our diversity data, established a new inclusion and diversity governance model, and ran Race Allyship Training for all employees.

**Wellbeing:** We want everyone at PA to recognise the importance of looking after their and their team's wellbeing and feel able to ask for support when they need it, and in response to employee feedback, we have also upweighted our focus in this area. We have a dedicated wellbeing resource site with both internal and external resources and support services, including learning plans for all employees as well as people managers to support them in looking after their teams. We have also recently run resilience sessions in several teams and will be rolling out these and other informational sessions over the next few months. In addition, we regularly share videos with leaders and employees at all levels talking about mental health to continue to tackle the stigma associated with mental health in the workplace. We have actively promoted all of this work throughout the COVID-19 pandemic, and we have also made a number of changes to our HR policies to reflect the need for flexibility during this time.

**Partner Ethics** (doing the 'right thing', rather than 'the easy thing') reflects the standards we set out for our partners, as our partners have such a significant role as leaders in our firm. Their behaviour, actions and inactions impact our firm, our people, our clients and our broader environment, in many ways. Beyond our role as corporate citizens, our partners have a major influence on our people and on our strength and stability as a firm. The standards of ethical behaviour we set for partners are valued (and assessed) both for positive reasons – so that we can become as great a firm as we aspire to be and project a strong positive profile to our clients and our people, and to avoid negative issues – with poor actions creating damages or risk. Our review of PA-wide Ethics includes continuous improvement principles – as we look for ways to further improve ethical behaviour across PA, to further raise the standards we set ourselves and to ensure that we achieve our standards even more often and even more completely

**Giving Back and Volunteering** reflects a strong desire among many people in PA to take part in activities or actions which contribute something to meet the needs of wider society, such as involvement with charities and other social causes. We think the best way that PA can support social causes is through the time and skills of our employees. As such, our people interested in committing time to a socially worthwhile project will be able to spend up to three days a year to eligible projects.

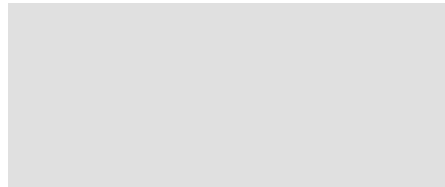
**Speaking Up/Whistle blowing** is about encouraging people across PA to take active responsibility for improving our performance, whether through enhancing working practices or drawing attention to behaviours or other issues which give them concern. This involves introducing procedures and mechanisms to allow people to speak up, and the cultural change that will give them confidence to do so in good faith and in the expectation of being heard.

**Our Environment, Health and Safety Management** programme aims to minimise the risks to the safety of our employees and other stakeholders, to manage our potential impact on the environment locally to our sites and to act to reduce our contribution to climate change. Our key facilities are accredited to ISO 45001 (health and safety), 14001 (environment) and 50001 (energy), to instil a culture of continuous improvement in our operations. During 2020 this work has been particularly vital as we have sought to manage the impact of COVID-19 on our own employees, while supporting governments and organisations to respond to the pandemic through the work we do.

Signature

Position:  
Chief Executive Officer

Kendall



**PRINCIPLE 1 BUSINESS SHOULD ENSURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES**

**PRINCIPLE 2 BUSINESS SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS**

### **Our Commitment or Policy**

PA believes respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence. We treat all employees equitably regardless of local economic conditions, traditions and cultures. We do not tolerate harassment, discrimination, threats or acts of violence, intimidation or coercion. We permit no exploitation of children, physical punishment or abuse. We do not use forced labour, including bonded, indentured or prison labour.

We are committed to complying with all laws and regulations applicable to our business. Our commitment is reflected in our policies which require all PA people to act ethically and with integrity in all our business relationships. This includes taking steps to ensure that there is no human trafficking or slavery in our supply chain or within any part of our business.

Our commitment is underpinned by a consistent and fully documented set of global operating procedures.

### **A brief description of our Processes or Systems:**

**Performance Management:** PA maintains an automated process of personnel reviews, myCareer, which requires twice-yearly downward reviews of all employees as well as upward and peer reviews of senior consultants and partners. These 360-degree reviews are provided to line managers and PA's Partner Election Committee. Through this process, PA encourages all employees to comment on and document the behaviours of our senior management against the published norms for these ranks. Feedback is encouraged outside of these two formal review points and all employees can give feedback to anyone of any rank at any time via our myCareer system.

**Speaking Up** is a confidential channel available to all PA people where they can register any concerns or issues they may have about the conduct of any member of the firm and help us to maintain the high professional standards we all expect. We recognise the difficulties created for individuals by others' poor behaviour and how this challenges our ambition to create a more inclusive workplace and encourage our people to speak up with confidence that each of us will be heard and supported. Employees can also raise their concerns anonymously through this channel if required. We remind our people annually of these channels.

**Measuring Employee Engagement:** to ensure we can continue to make PA an even better place to work and remove barriers to performance, we regularly measure how our people are feeling about working here through our employee engagement and other pulse surveys, identifying the areas where we are making progress, and where we need to focus next. In 2020, our survey revealed a need for to provide more support for our employees' mental and physical wellbeing, particularly during the COVID-19 pandemic, create alternative career paths, and ensure transparency in our reward and recognition processes. We plan to run more 'pulse' surveys for our people moving forward into 2021 and beyond, to understand our progress and intend to move towards a more agile, consistent means of measuring engagement at PA.

**People policies:** we make sure we have fair, transparent, inclusive, and consistent people policies in place to address the needs of our diverse workforce from the day they join PA until the day they leave. These policies are in line with minimum legal requirements and, in many cases, exceed them. We review these on a regular basis to ensure they are reflective of our ambition to create a more inclusive and supportive environment where all of our people can excel. A good example is our Flexible Working Policy, through which we invite people to apply for alternative working arrangements that provide them with the flexibility they need to be successful and achieve the work-life balance that is right for them. We have many employees across various ranks and geographies who enjoy a flexible working arrangement such as part-time working, sabbaticals or career breaks.

### **Actions implemented in the last year / planned for next year:**

**Learning & Development:** We continue to promote the PA Academy which provides our people with access to learning and a range of resources accessible via mobile devices 24/7. We have invested significantly in developing our coaching capability, to provide quality support at an

individual level to all ranks in PA. We have skilled up to a qualified level coaches in all our prime geographies and their support is available via the PA Academy.

**Inclusion and Diversity:** In 2020 we refreshed our I&D strategy and launched a new I&D governance model which recognizes the strategic importance of I&D to PA and aligns with Sustainable Development Goal 10. The new governance includes Board-level I&D sub-committee, a group dedicated to holding the firm to account for I&D progress. In addition, we have created a Global I&D Steering Committee which is comprised of partners and members of our Operating Committee and is responsible for developing and implementing our I&D strategy. As part of our overall strategy refresh, we hosted a series of discovery discussions with our Partner group, as well as listening sessions with our employee networks and various other segments of the PA population. The sessions were designed to gain insights into how our people are feeling and where they think we could be doing more on the I&D agenda. Another area of focus has been the launch of a new diversity data collection exercise, to help us better understand the composition of our workforce today and how we might want this to evolve in future. We also have several thriving employee networks, that provide new ways for our employees to connect with one another; Women's, PRIDE, BAME (Black, Asian, Minority Ethnic), and the Mental Health & Wellbeing Networks. We're also supporting inclusion through other initiatives, such as a relaunch of PA's Reverse Mentoring scheme and membership of the 30% club cross business mentoring programme. We continue to focus on achieving more diversity at senior levels in the organisation with a focus on both our internal and external partner and wider recruitment pipelines.

**Wellbeing:** Our Mental Health & Wellbeing Network Champions encourage our employees to support each other in challenging the stigma around mental health. We signed the Time to Change pledge to further reinforce this commitment and engaged our people through a series of wellbeing-related communications campaigns. Since then we have created a network of over 150 champions and 40 Mental Health First Aiders who help individuals and tackle stigma. This year we plan to build on our progress by introducing Mental Health training for our managers at PA, as well as broadening out our wellbeing approach to also cover physical health and lifestyle related elements. We are also creating a wellbeing hub for our people, to access support services as well as ongoing events such as Improving Resilience, and activities such as yoga classes.

### **Measurable Results or Outcomes**

While PA does not set standards for measures in this area our employee engagement results can be considered an indication of progress and the levels of goodwill we are engendering in our people. 74% of our people took part in our 2020 employee engagement survey, and we achieved an overall engagement score of 7.3 across the firm, an improvement from our 2019 score. We will continue to work to improve both participation and levels of engagement over time, focusing on the areas that our people tell us will make the biggest difference to their experience at PA.

**PRINCIPLE 3 BUSINESS SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING**

**PRINCIPLE 4 BUSINESS SHOULD SUPPORT THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR**

**PRINCIPLE 5 BUSINESS SHOULD SUPPORT THE EFFECTIVE ABOLITION OF CHILD LABOUR**

**PRINCIPLE 6 BUSINESS SHOULD SUPPORT THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION**

### **Our Commitment or Policy**

PA believes respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence. We treat all employees equitably regardless of local economic conditions, traditions and cultures. We do not tolerate harassment, discrimination, threats or acts of violence, intimidation or coercion. We permit no exploitation of children, physical punishment or abuse. We do not use forced labour, including bonded, indentured or prison labour.

We are committed to complying with all Laws and Regulations applicable to our business. Our commitment is reflected in our policies which require all PA people to act ethically and with integrity

in all our business relationships. This includes taking steps to ensure that there is no human trafficking or slavery in our supply chain or within any part of our business.

### **A brief description of our Processes or Systems**

PA is committed to building an inclusive and supportive culture where diversity thrives, and all of our people can excel. We believe that greater diversity stimulates innovation, enabling us to fulfil our purpose of 'Bringing Ingenuity to Life', supporting the growth of our people, and delivering more enduring results for our clients.

### **Actions implemented in the last year / planned for next year**

This year we formed a Global Inclusion & Diversity Steering Committee to lead a global Inclusion & Diversity programme, designed to help us build a more inclusive culture at PA that drives diversity. Key areas of focus are outlined in response to Principles 1 and 2. Our networks have continued to evolve this year to provide focus on the particular groups they represent. The focus for the coming year will be to externalise their activity to link up with clients and other external organisations to drive the agenda forward.

### **Supplier Diversity**

PA views diverse suppliers as small and medium enterprises; suppliers from underrepresented or ethnic minority groups; and suppliers demonstrating a diverse workforce composition. Our supplier diversity policy helps ensure that the contracts that PA places with suppliers provide value for money, and that a diverse range of suppliers have fair opportunity to compete for and win new work. We also encourage our suppliers to adopt best-practices in terms of diversity and monitor this through our supplier pre-qualification questionnaire. This brings real business benefits through:

- Increasing competitiveness by identifying suppliers who are more efficient, flexible, innovative, and committed
- Providing access to new markets
- Demonstrating engagement with underrepresented or ethnic minority groups
- Promotes ethical Corporate Social Responsibility

We will strive to ensure that the purchase of goods and services is undertaken in line with our inclusion and diversity commitments and, whenever possible, is from agencies or companies who share our values on equality of opportunity and diversity by:

- Assessment of our success in attracting a wide range of suppliers to tender for work
- Analysis of the distribution of contracts awarded between businesses of different sizes and ownership
- Regular review of procurement practices to ensure consistency and to identify any barriers to minority owned businesses demonstrating value for money.

PA is committed to a consistent and fair tender process and to facilitate this, for centrally coordinated tenders, all potential suppliers will receive:

- Request for quotation/proposal letter inviting suppliers to participate
- Intent to respond document
- Non-disclose document.

Upon completion of these documents, suppliers wishing to tender will receive the RFQ/RFP which includes timescales and the format of responses that suppliers must adhere. All tenders provide for an opportunity to allow suppliers to respond with questions and to give an identical time period for all to respond.

### **Measurable Results or Outcomes**

To ensure that a diverse supplier base is aware of opportunities to work with PA, we benchmark with at least three (3) suppliers; review periodically the channels by which we attract supplier interest and identify and address any barriers to involvement; and seek advice from external sources on appropriate ways of attracting diverse expressions of interest for different types of work and introductions to networks with knowledge of underrepresented groups. We actively engage a diverse base of organisations to help them understand our bidding process and raise their awareness of business opportunities.

PA are signatories to The Prompt Payment Code (PPC). This code sets a standard for payment practices and best practice and is administered by the Chartered Institute of Credit Management. Compliance with the principles of the Code is monitored and enforced by the Prompt Payment Code Compliance Board. The Code covers prompt payment, as well as wider payment procedures. PA filed its fifth set of results in July 2020 in compliance with the UK Government legislation Duty to report. This scheme was introduced in 2017 to monitor the payments to SME's and Sole traders. The Payment practices applies to large companies and LLP's that exceed over a certain size and turnover criteria. This data can be found on the governments website [here](#).

PA is committed to treating their suppliers fairly no matter what size.

<b>PRINCIPLE 7</b>	<b>BUSINESS SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES</b>
<b>PRINCIPLE 8</b>	<b>BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY</b>
<b>PRINCIPLE 9</b>	<b>BUSINESS SHOULD ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES</b>

### **Our Commitment or Policy**

PA recognises our responsibility towards the environment, and the importance of minimising, as far as possible, the harmful impacts on the environment caused by our day-to-day activities and the services we provide to our clients.

As part of our commitment to protecting the environment, and in line with the Sustainable Development Goals, we seek to reduce our impact to water, land and air, to eliminate our impact on local terrestrial and aquatic ecosystems (SDG 14 and 15). We comply with all applicable legal and other requirements relevant to the environmental impacts of our operations. We have implemented a fully documented Environmental Management System (EMS) which includes the framework for setting our objectives and targets and ensuring that the international standard of ISO14001 is met or exceeded. We have also attained the ISO 50001 Energy Management System accreditation in the UK to support our efforts to reduce our carbon footprint, in line with SDG 13.

We strive to achieve environmental best practice through:

- Maintaining effective waste management, separating and recycling waste wherever possible, and disposing of waste responsibly
- Enhancing energy efficiency through prudent consumption, monitoring of energy use, and consideration of energy efficient technology and renewable alternatives
- Implementing an environmental awareness campaign to promote employee participation to help reduce the environmental impacts of PA's operations
- Monitoring and reviewing our environmental performance to ensure that progress towards our objectives and targets is maintained.

### **A brief description of our Processes or Systems**

PA's documented environment, health and safety management system has been developed to meet the requirements of ISO 14001, ISO 45001 and ISO 50001. This ensures we meet our Regulatory requirements in these areas, including management of our environmental impact and energy use, and assures our contribution towards Sustainable Development Goals 13, 14 and 15. External verification for the system now includes the majority of UK members and all PA-owned real estate. We are committed to continually improving and expanding this management system over time. We monitor and document our carbon footprint on an annual basis and will continue to do so.

### **Actions implemented in the last year / planned for next year**

During 2020 we maintained accreditation of our management system to ISO 50001 (energy management) and ISO 14001 (environmental management), to reinforce our commitment to reducing our carbon footprint, and to support our regulatory compliance. This has required us to establish a comprehensive set of energy performance indicators to monitor consumption going forward.



We have made improvements to our waste management procedures, to reduce the carbon footprint of the disposal process, improve data quality and improve recycling rates. We have also introduced food waste recycling and on-site composting of coffee grounds. We continue to work to reduce waste production and, for example, have introduced re-usable glass bottles for our milk supply to our head office.

We continue to operate our sound energy management practices, including:

- On-going phase out of fluorescent lighting (on failure) in favour of LED.
- All new fit out includes LED lighting and PIR sensors
- PPM schedules in place for key plant and equipment to ensure efficient running
- Reducing production of waste electronic equipment through refurbishment and reuse or resale as far as possible

Key contracts are monitored for environmental impact and KPIs agreed with suppliers as appropriate. For example, our on-site catering contract includes a requirement to reduce water consumption year on year.

Our work with clients represents a significant contribution across a range of SDGs, but many of our projects are particularly relevant to SDGs 13, 14 and 15, while our work across geographies and organisations represents a clear commitment to SDG 17.

For example, our pioneering work with PulPac will provide a cellulose based alternative to a wide range of disposable plastic products including cutlery, trays and even bottles. Removing the need for single use plastics across a range of industries gives us the potential to prevent a vast quantity of plastic waste at source, and replace it with a renewable, pollution-free alternative. As well as the direct contribution to protecting the environment, we are leveraging our connections across a range of industries to push this important product out into the marketplace more quickly and widely than the original PulPac team could have done. We are also working with Water Source where we are helping an Australian B-Corp start-up to develop a de-centralised water treatment facility that leverages the internet of things and circular economy principles to empower water providers and users with potable water. The facility cleans water at the community level, a process that could revolutionise the way water is delivered to millions around the world.

### **Measurable Results or Outcomes**

We continue to measure our global carbon footprint and increase the robustness and scope of our footprint assessment. As we increase the breadth of our (scope 3) reporting, this leads to an apparent year on year increase, however our like-for-like scope 1/2 emissions have decreased by ~9% this year. We have had no adverse environmental incidents on our premises.

## **PRINCIPLE 10 BUSINESS SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY**

### **Our Commitment or Policy**

It is PA's policy that no employee, representative or agent of PA shall do business for or on behalf of PA in such a manner as to violate local, state or federal laws of any country in which we conduct business or to engage in any activity that might have the appearance of an illegal or unethical act. This is set out in our Code of Conduct.

### **A brief description of our Processes or Systems**

PA complies with the UK Bribery Act and the FCPA. All staff have been trained in knowing how to spot situations of high risk and how to report anything suspicious.

The prevention of bribery and unethical practices is part of our Code of Conduct which all employees must adhere to.

Our trading contracts have anti-bribery clauses and our supplier selection process questions the potential supplier about their processes for preventing bribery and corruption.

- All new employees undergo anti-bribery training as part of the orientation of new employees. Current employees are reminded of their obligations through the Code of Conduct and any updates and compulsory training. Certain training courses for senior

consultants also provide reminders (e.g. Fundamentals of Legal and Assignment Management Excellence or Commercial Leadership in PA) which are targeted at people more likely to encounter unethical situations. Work outside of our normal office locations is scrutinised for risks by our High-Risk Assignment Committee which will include assessing any bribery risk. (E.g. the use of agents is very carefully scrutinised).

#### **Actions implemented in the last year / planned for next year**

Our procedures for the prevention of bribery have recently been reviewed and minor amendments have been made to our policies. New e-learning training for those joining the company has been provided and a compulsory training course has been rolled out to all employees, which will have to be taken annually.

#### **Measurable Results or Outcomes**

All full-time employees complete anti-bribery training and logs are kept. Global Procurement has details of suppliers' acknowledgements to ensure they have adequate procedures in place to prevent bribery.

#### **How do you intend to make this COP available to your stakeholders?**

This Communication on Progress will be submitted to the Global Compact and made publicly available. PA may include relevant sections of the COP published in PA's Annual Report.