



The UN Global Compact

Communication on Progress 2020-2021

Contents

Statement of Continued Support by The Managing Director	2
COP Reporting Structure	3
Human Rights	4
<ul style="list-style-type: none">- UNGC Principles- Commitment- Policies and Systems- Measurement of Outcomes- SDG Impact- Goals for 2021-22	
Labour	8
<ul style="list-style-type: none">- UNGC Principles- Commitment- Policies and Systems- Measurement of Outcomes- SDG Impact- Goals for 2021-22	
Environment	13
<ul style="list-style-type: none">- UNGC Principles- Commitment- Policies and Systems- Measurement of Outcomes- SDG Impact- Goals for 2021-22	
Anti-corruption	19
<ul style="list-style-type: none">- UNGC Principles- Commitment- Policies and Systems- Measurement of Outcomes- SDG Impact- Goals for 2021-22	



This is our **Communication on Progress** in implementing the Ten Principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

Statement of Continued Support from the Managing Director

I am pleased to express our continuing support for the UN Global Compact and the Ten Principles across the areas of human rights, labour, environment and anti-corruption.

Since pledging its commitment to the UN Global Compact in 2019, Bradburys Group has implemented significant change within our operational processes and policies to further align with the Ten Principles and our first annual Communication on Progress (COP) describes how the UN Global Compact and the Ten Principles have been integrated into the culture at Bradburys Group including the milestones that have been reached over the preceding year.

We recognise our moral obligation to operate beyond compliance and we are extremely grateful for the opportunity to learn from the UN Global Compact which has proved to be invaluable in providing an opportunity for us to advance our corporate sustainability strategy and the broader development goals of the United Nations including the Sustainable Development Goals (SDGs).

We are conscious that there is always room to improve and I look forward to reporting on our progression next year as we reaffirm our commitment to the UN Global Compact and its principles.






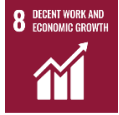

Roger Marshall
Managing Director, Bradburys Global Risk Group

COP Reporting Structure

Our COP is structured to ensure that we reflect our understanding and appreciation of the UN Global Compact's objectives and to demonstrate how our processes align with the Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.

UNGC Principles	The UNGC guiding principles across the issue areas of Human Rights, Labour, Environment and Anti-Corruption.
Commitment	Summary of our commitment to the UNGC guiding principles across the issue areas of Human Rights, Labour, Environment and Anti-Corruption.
Policies and Systems	Our company policies and systems which align with the UNGC guiding principles in each of the four areas of Human Rights, Labour, Environment and Anti-Corruption.
Implementation	Description of our actions on the implementation of policies, procedures and corporate practices in each of the areas of Human Rights, Labour, Environment and Anti-Corruption.
Measurement of Outcomes	Evaluation of our sustainability efforts, progress and the degree to which performance indicators and milestones were achieved over the previous year.
SDG Impact	How the implementation of policy, procedures and corporate practices help us to support the UN Sustainable Development Goals.
Goals for 2021-22	Our objectives to further align the UN Global Compact principles for 2021-2022.

Human Rights







UNGC Principles	Commitment	Policies and Systems	Implementation	Measurement of Outcomes	SDG Impact	Goals for 2021-22
<p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and</p> <p>Principle 2: make sure that they are not complicit in human rights abuses.</p>	<p>Bradburys Group is committed to respecting and safeguarding the human rights of all people. We believe that it should be a collective responsibility for all organisations, irrespective of size, sector or geographical location, to positively contribute to; and to ensure that the fundamental freedoms of all are recognised, assessed, managed and protected.</p> <p>Our ethical commitment to upholding the UNGCs principles on human rights is expressed in our Global Human Rights Policy Statement which is driven by the following internationally recognised human rights standards;</p> <p>The Universal Declaration of Human Rights (UDHR);</p> <p>the Office of the High Commissioner for Human Rights (OHCHR) International Bill of Human Rights;</p> <p>the UN Guiding Principles on Business and Human Rights;</p>	<p>Recognising the United Nations Guiding Principles of Business and Human Rights, our Global Human Rights Policy Statement publicly affirms our responsibility to protect and promote human rights across the company including the processes which are embedded into our operating practices to protect human rights, including responsible sourcing, human rights due diligence and risk management measures which are employed to identify, prevent, mitigate and eliminate any instances of human rights violations which may arise in connection with our business operations and supply chain.</p> <p>Our commitment to the UNGCs principles on human rights is further conveyed within the following policy documents which are also available on the Bradburys Group website:</p> <p><i>Global Code of Business</i></p>	<p>Our strong principles steer us to create better outcomes for the growth and success of our clients; to have a positive impact within the sectors and communities which we operate in and to ensure a safe and inclusive workplace for our employees.</p> <p>One of our most repeated company values at Bradburys Group is <i>'Everything can be improved, evolved and optimised, this is how progress is made'</i>. This belief is pertinent when it comes to long-term sustainability goals which can only be achieved through learning and education, awareness, understanding, improvement, adjustment and implementation.</p> <p>We have implemented the following measures to prevent human rights violations within the company's operations:</p> <p>A Human Resources and Health and Safety Compliance</p>	<p>To date, no human rights violations or potential infringements have been reported or identified within the business.</p> <p>Over the past twelve months, Bradburys Group has achieved measurable advances in our processes, systems and standards.</p> <p>The company's annual compliance review of its supply chain partners confirms no instances of human rights violations.</p> <p>The company has progressed to a 'Disability Confident Committed' Employer as certified by the UK government.</p> <p>We have attained SafeContractor accreditation for achieving excellence in health and safety within the workplace, awarded by a leading third-party industry accreditation scheme following</p>	    	<p>Each year, the company sets itself goals which are realistically achievable. Our core focus areas for the year ahead are to:</p> <p>Establish a confidential online whistleblowing system hosted by a third-party provider to encourage employees to raise concerns regarding any unethical practices including human rights violations within the business;</p> <p>transition from remote online human rights awareness and training to a classroom-based delivery;</p> <p>deliver annual human rights refresher training for all employees;</p> <p>introduce classroom-based diversity and inclusion training upon induction to the company with annual refresher training;</p> <p>introduce knowledge testing</p>

	<p>the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work;</p> <p>the Montreux Document on Private Military and Security Companies;</p> <p>the UN Global Compact; and</p> <p>the UK Modern Slavery Act.</p> <p>Our Global Human Rights Policy Statement, which is accessible via the Bradburys Group website, makes the following policy commitments to respect, support and promote human rights, by:</p> <p><i>Building a culture where everyone feels welcome, equal and respected irrespective of beliefs, gender, age, religion, cultures, sexual orientations and disabilities;</i></p> <p><i>supporting and respecting the protection of internationally proclaimed human rights;</i></p>	<p><i>Conduct;</i></p> <p><i>Anti-Bribery and Anti-Corruption Policy;</i></p> <p><i>Dignity at Work Policy;</i></p> <p><i>Equal Opportunities Policy;</i></p> <p><i>Whistleblowing Policy;</i></p> <p><i>Modern Slavery Act Statement;</i></p> <p><i>Supplier Code of Conduct; and</i></p> <p><i>Supplier Pre-Qualification Assessment.</i></p>	<p>Team has been established to support our in-country Operations Managers and the Managing Director in ensuring that we remain compliant and adhere to internationally recognised standards.</p> <p>The company's support helpline and assistance programme provided by a third-party organisation supports employees with confidential advice 24/7-365.</p> <p>Employees and supply chain partners have direct 24/7-365 access to senior management and the compliance team to report any instances of human rights violations within the business or its supply chain which is communicated in the company's Global Code of Business Conduct and Supplier Code of Conduct.</p> <p>Our Grievance Policy and procedure provides clear instructions on how to raise complaints and sets out our commitment to investigating any matters raised.</p>	<p>a robust and lengthy assessment of our health and safety documentation, policies and procedures which are compared against the SafeContractor Charter Standards.</p> <p>In furthering upon the UK Ministry of Defence Employers Recognition Scheme Silver Award received in 2017, the company has introduced additional HR policies and procedures to bolster its existing support for the Armed Forces Community including Reserves, Veterans, Cadets, military partners/spouses and former service personnel who have been injured in the line of duty (including wounded, injured and sick) who may otherwise struggle during the transition process into civilian life.</p>		<p>on the company's policies including our Global Code of Business Conduct and Human Rights Policy Statement;</p> <p>achieve The UK Ministry of Defence Employers Recognition Scheme Gold Award;</p> <p>develop partnerships with two mental health foundations including one of which supports former service personnel; and</p> <p>progress to the UK government's 'Disability Confident Leader' status through an independent external assessment of our internal policies and practices.</p>
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	<p><i>ensuring that we are not complicit or ignorant to human rights abuses;</i></p> <p><i>ensuring that we avoid directly or indirectly contributing to human rights infringements;</i></p> <p><i>complying with all applicable laws and respect internationally recognised human rights;</i></p> <p><i>upholding and adhering to the highest principles of law and ethical conduct where local laws and standards vary;</i></p> <p><i>implementing and reviewing robust and effective policies and mechanisms to identify, prevent, mitigate and eliminate adverse human rights impacts and revising where appropriate;</i></p> <p><i>ensuring that we only engage in business relationships with organisations who share our principles and values on human rights;</i></p> <p><i>engaging openly and regularly with employees, clients and supply chain organisations on issues that may infringe upon human rights; and</i></p> <p><i>maintaining transparent</i></p>		<p>Our Employee Duty of Care programme has been bolstered with weekly well-being and mental health assessments.</p> <p>Remote online human rights awareness and training is provided for employees upon induction to the company;</p> <p>The 'SDGs in Action' mobile application is now pre-installed on all company-owned mobile devices to promote awareness and engagement of the SDGs in personal and professional lives.</p> <p>In 2020, we expressed our public support for the Partnership for Global LGBTI Equality (PGLE) Standards of Conduct for Business.</p>			
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	<i>reporting procedures relating to instances of human rights abuse resulting from our direct or indirect actions.</i>					
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Labour

UNGC Principles	Commitment	Policies and Systems	Implementation	Measurement of Outcomes	SDG Impact	Goals for 2021-22
<p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p> <p>Principle 4: the elimination of all forms of forced and compulsory labour;</p> <p>Principle 5: the effective abolition of child labour; and</p> <p>Principle 6: the elimination of discrimination in respect of employment and occupation.</p>	<p>Bradburys Group is committed to operating to the highest possible legal and ethical standards and we acknowledge our moral duty to operate beyond compliance. Our alignment to the UNGCs principles on labour enables us to reinforce standards and values across the company within its operational practices and policies which are guided by the universally recognised standards and Conventions of the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.</p> <p>The right to collective bargaining is recognised and supported at Bradburys Group which is documented further within the Employee Handbook. The company believes in fair, open and constructive discussions to resolve problems and we commit to negotiating any issues raised collectively by colleagues in a fair and impartial manner to reach mutually acceptable agreements.</p>	<p>Through the guidance of the UNGC principles and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, we continue to review our approach to labour issues within our sector including implementation of best practice and analysis of our policies and systems to ensure that standards and working practices are constantly improving.</p> <p>The following policies expand on our values and procedures within the specific areas of labour rights and equal opportunities:</p> <p><i>Global Code of Business Conduct;</i></p> <p><i>Employee Handbook;</i></p> <p><i>Dignity at Work Policy;</i></p> <p><i>Equal Opportunities Policy;</i></p>	<p>The Human Resources and Health and Safety Compliance Team supports our in-country Operations Managers and the Managing Director in ensuring that we remain compliant and adhere to internationally recognised standards.</p> <p>The company's support helpline and assistance programme provided by a third-party organisation supports employees with confidential advice 24/7-365.</p> <p>Employees and supply chain partners have direct 24/7-365 access to senior management and the compliance team to report any instances of labour rights violations within the business or its supply chain.</p> <p>Equal opportunities along with the company's zero-tolerance stance towards discrimination is discussed with employees upon induction to the company.</p> <p>The company conducts recruitment vetting internally</p>	<p>To date, the company has not been the subject of investigation, legal cases, rulings, fines and other relevant events in relation to labour conditions.</p> <p>To date, the company has not received any prohibition, improvement notices or enforcement action requirements with regards to health and safety within the workplace.</p> <p>To date, the company has found no instances of forced or compulsory labour, nor any indication of the exploitation of child labour within the business.</p> <p>The company's annual compliance review of its supply chain partners confirms no instances of forced or compulsory labour, nor any indication of the exploitation of child labour.</p> <p>The company has received SafeContractor accreditation</p>	     	<p>Our goals for the year ahead across the area of labour rights are to:</p> <p>Seek to further align employee remuneration through incentive programmes;</p> <p>develop a transparency scheme for employees to learn how internal processes work including succession planning and performance management;</p> <p>establish a confidential online whistleblowing system hosted by a third-party provider to encourage employees to raise concerns regarding any unethical practices including labour rights violations within the business;</p> <p>introduce classroom-based equal opportunities training upon induction to the company with annual refresher training;</p> <p>introduce unconscious bias training for management;</p>



	<p>We recognise that certain industry sectors and operating regions present a greater risk of exploitation than others and we acknowledge that our supply chain falls within these areas; as such, suppliers wishing to participate in the company's procurement process are required to comply with our Supplier Code of Conduct including agreement to the following obligations:</p> <p><i>Suppliers will foster a culture and working environment that does not accept any form of harassment including sexual harassment, threats of harassment, or retaliation for the reporting of such practices;</i></p> <p><i>all employment shall be freely chosen by the worker and they shall be free to terminate their employment at any time subject to terms and conditions of employment and shall not be subject to any form of intimidation or restrictions;</i></p> <p><i>suppliers must only employ workers with a legal right to work;</i></p>	<p><i>Health, Safety and Environmental (HSE) Policy.</i></p> <p><i>Whistleblowing Policy; and</i></p> <p><i>Modern Slavery Act Statement.</i></p> <p>Our responsible sourcing due diligence measures identify, prevent, mitigate and work towards eliminating any instances of labour issues arising from our supply chain. Suppliers wishing to participate in the company's procurement process are required to adhere to our:</p> <p><i>Supplier Code of Conduct; and</i></p> <p><i>Supplier Pre-Qualification Assessment.</i></p> <p>Our robust supplier vetting incorporates ethical and legal standing including human rights, labour and modern slavery conduct and commitment in addition to equal opportunities and diversity and inclusion practices. The disclosure of supporting evidence by way of</p>	<p>which removes the risk of prospective applicants being coerced into accepting employment conditions through a third-party where ethical standards or legal responsibilities may not reflect our own.</p> <p>The company continues to offer flexible working patterns for parents.</p> <p>The company continues to offer flexible working patterns for employees engaged in further education.</p> <p>The company rewards employees who go above and beyond for our clients, colleagues and communities through our Employee of the Month Scheme.</p> <p>Where possible, the company endeavours to accommodate employee's with medical appointments without using annual leave entitlement.</p> <p>Our mentoring programme ensures that employees are allocated with a dedicated</p>	<p>for achieving excellence in health and safety within the workplace, awarded by a leading third-party industry accreditation scheme following a robust and lengthy assessment of our health and safety documentation, policies and procedures which are compared against the SafeContractor Charter Standards.</p> <p>The company has progressed to a 'Disability Confident Committed' Employer as certified by the UK government.</p>	<p>achieve The UK Ministry of Defence Employers Recognition Scheme Gold Award;</p> <p>progress to the UK government's 'Disability Confident Leader' status through an independent external assessment of our internal policies and practices;</p> <p>increase the number of role swapping weeks throughout the year to provide employees variation within the workplace; and</p> <p>introduce two additional paid days per year for employees to volunteer for a charity of their choice within their local communities.</p>
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	<p><i>suppliers will not engage in any forced or involuntary labour practices or demand work or services from any individuals under threat, duress or intimidation;</i></p> <p><i>suppliers will not withhold or destroy, conceal, confiscate or deny access by workers to workers' identity or immigration documents; and</i></p> <p><i>suppliers will adhere to local laws relating to the minimum working age and will not engage in the employment of child labour, directly or indirectly.</i></p> <p>In compliance with the UK Modern Slavery Act 2015, our statement affirms our commitment to eradicating human rights issues including slavery and human trafficking and also sets out the systems and measures that we have implemented to ensure that human rights abuses have no part in our business or wider supply chain.</p> <p>We endeavour to ensure that colleagues do not face any form of discrimination within the</p>	<p>policy documentation, industry accreditation's and references in support of compliant operating practices, in addition to physical site visits/assessments are also essential requirements when establishing a successful relationship with Bradburys Group.</p> <p>Bradburys Group operates in certain countries and regions where laws, regulations and standards may vary. Where this is identified, we adhere to minimum age provisions of national labour laws and regulations. Where national law is deemed to be insufficient, we align with international standards.</p> <p>We recognise that our people are our greatest asset and without the commitment of our colleagues or the ability to retain employees, the business would fail to operate. We therefore have a responsibility to maintain a positive culture where everyone feels welcome, respected and treated with dignity.</p>	<p>mentor to provide one-to-one guidance and support.</p> <p>The company continues to support employees with pay advances and financial support. This offering has also been extended to our employees whose partners/spouses have faced redundancy as a result of the coronavirus pandemic and have found themselves in financial difficulty.</p> <p>Due to the nature of the security and risk sector, we recognise that there are occupational hazards are inherently higher when compared to certain industries. These risks are assessed by the company's Health and Safety Compliance Team in unison with our in-country Operations Managers and communicated to all personnel who may be exposed to any vulnerabilities during the course of their employment.</p> <p>The company's Health and Safety Compliance Team and in-country Operations Managers are available 24/7 for employees who wish to raise any health and safety concerns.</p>			
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	<p>workplace during their tenure with the company. Our values are embedded within the company's Global Code of Business Conduct, Dignity at Work Policy and Equal Opportunities Policy which are available to all employees.</p>	<p>We recruit based on qualifications, skills and experience, irrespective of beliefs, gender, age, religion, culture, race, colour, sexual orientation and disabilities as detailed in the following company documentation:</p> <p><i>Global Code of Business Conduct;</i></p> <p><i>Employee Handbook;</i></p> <p><i>Dignity at Work Policy; and</i></p> <p><i>Equal Opportunities Policy.</i></p> <p>Our <i>Grievance Policy</i> sets out the procedure and clear instructions for employees to raise complaints and affirms our commitment to investigating any matters.</p>	<p>We ensure that first aid and fire safety trained personnel are present at all locations.</p> <p>Our lone worker check-in protocol requires personnel to provide welfare updates at pre-designated times. Should a colleague fail to provide an update or be non-contactable for any reason, the company deploys local personnel to the location.</p> <p>Employees have access to occupational health advisors, financed by the company.</p> <p>The 'SDGs in Action' mobile application is now pre-installed on all company-owned mobile devices to promote awareness and engagement of the SDGs in personal and professional lives.</p> <p>Since the global coronavirus pandemic, the company has implemented a number of safety measures and TRPs to support the welfare of our employees and clients, including:</p> <p>Continuous supply of surgical</p>			
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			<p>gloves, face masks, hand sanitizers, gels and wipes;</p> <p>infrared no-touch thermometers issued to all operational teams and client sites along with employee temperature check sheets and audit logs;</p> <p>we have ensured that employees are home-based where possible;</p> <p>enhanced cleaning procedures introduced for working areas; and</p> <p>suspension of non-business critical domestic and international travel.</p> <p>Following the progression to a 'Disability Confident Committed' Employer as certified by the UK government, the company ensures that all employment candidates who possess a disability are invited to for an interview.</p>			
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Environment

UNGC Principles	Commitment	Policies and Systems	Implementation	Measurement of Outcomes	SDG Impact	Goals for 2021-22
<p>Principle 7: Businesses should support a precautionary approach to environmental challenges;</p> <p>Principle 8: undertake initiatives to promote greater environmental responsibility; and</p> <p>Principle 9: encourage the development and diffusion of environmentally friendly technologies.</p>	<p>Bradburys Group is committed to ensuring that our business activities are conducted in a responsible and sustainable manner and seek to learn and develop whilst identifying effective ways of reducing our environmental impact which are unique to our company's operations. Due to the nature of our business activities, we recognise that the greatest adverse impact as a direct result of our business activities derives from fuel consumption and office operations, both of which have been largely impacted due to the coronavirus pandemic.</p> <p>We regard compliance with the law as the minimum standard to be achieved and our drive for improving environmental performance is an integral part of our business strategy and operating practices.</p> <p>Everybody within the company has an important part to play, but clear leadership from senior management is crucial and underpins all of the company's</p>	<p>Our focus on environmental sustainability and how our operations and supply chain affect our personnel, clients and the communities in which we work is expressed in the following company documentation and policies:</p> <p><i>Health, Safety and Environmental (HSE) Policy;</i></p> <p><i>Environmental Policy;</i></p> <p><i>Employee Handbook;</i></p> <p><i>Supplier Code of Conduct; and</i></p> <p><i>Supplier Pre-Qualification Assessment.</i></p> <p>The company's Health, Safety and Environmental (HSE) Policy which is available to all company employees and stakeholders. A copy of our HSE documents for specific operations, countries, objectives and risk appetite are discussed with all</p>	<p>Over the past twelve months, there have been considerable changes to our operating practices as a result of the coronavirus pandemic, however, we have fortunately been able to implement a number of positive measures to reduce our environmental impact.</p> <p>In-country managers have received online environmental reduction and environmental impact assessment training;</p> <p>The 'SDGs in Action' mobile application is now pre-installed on all company-owned mobile devices to promote awareness and engagement of the SDGs in personal and professional lives.</p> <p>The company promotes vehicle-sharing which has been withdrawn at the time of reporting due to the coronavirus pandemic.</p>	<p>To date, the company has not been the subject of investigation, legal cases, rulings, fines and other relevant events in relation to adverse environmental actions.</p> <p>We have introduced an Environmental Management System which defines how the company approaches environmental sustainability, through:</p> <p>Policy and Strategic Objectives;</p> <p>Evaluation and Risk Management;</p> <p>Planning;</p> <p>Implementation and Monitoring; and</p> <p>Review and Audit for continuous improvement.</p> <p>We have increased remote online meetings due to the pandemic. The company plans to maintain this method of</p>	 	<p>Our goals for the year ahead to improve upon our environmental actions and responsibilities, are to:</p> <p>Continue to reduce waste along with our impact on the environment;</p> <p>introduce environmental awareness and responsible action training upon induction to the company with annual refresher training;</p> <p>develop and roll-out an Environmental Toolkit to support the Environment Management System;</p> <p>increase employee engagement in the implementation of our environmental policy;</p> <p>implement a cycle to work scheme;</p> <p>resume vehicle sharing; and</p> <p>commit to at least one project</p>

	<p>actions to achieve good health, safety and environmental management practices which are comprehensive, effective, robust and compliant with statute, whilst being proportionate and achievable in the context of what we do.</p> <p>To ensure that our services are continually improving, we are committed to minimising the environmental impact of our work, promoting environmentally positive innovations and increasing awareness of environmental issues.</p> <p>We are dedicated to developing increased care and attention to the environment, by:</p> <p>Minimising the consumption of resources;</p> <p>reducing carbon emissions;</p> <p>reducing waste generation;</p> <p>using sustainable materials; and</p> <p>conserving energy and water.</p>	<p>employees of relevance through planned health and safety training and periodic health and safety awareness campaigns, reviews and assessments.</p> <p>The company's Environmental Policy sets out internal and external processes to support a precautionary approach to environmental challenges and encourage greater environmental responsibility, including:</p> <p>Office supplies: We will evaluate the environmental impact of any new products we intend to purchase;</p> <p>Maintenance and office cleaning: Maintenance and cleaning materials are checked to ensure they are as environmentally friendly as possible;</p> <p>Water: We will avoid water wastage wherever possible;</p> <p>Chemicals and hazardous substances: Wherever possible we will substitute substances that are harmful to the environment with those</p>		<p>communication going into the future to reduce travel requirements.</p>		<p>which supports climate change.</p>
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		<p>that have less negative impact;</p> <p>Energy: Lights and electrical equipment will be switched off when not in use and heating will be adjusted with energy consumption in mind. Reducing energy use through a wide range of initiatives including turning off lights and computers when they are not in use; only filling kettles to the required amount when making drinks; using energy saving bulbs where appropriate;</p> <p>Fair Trade: The company will seek to purchase fair-trade and environmentally sound goods. Refreshments for meetings, training and events should, wherever possible, be purchased from local suppliers to reduce food miles (preferably within the social economy). Any wood products purchased should carry the Forestry Stewardship Council logo;</p> <p>Recycling: Recycling is promoted across the business and all personnel are asked to consider what they are disposing as it could contain elements which can be recycled for future use;</p>				
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		<p>General waste: We will reduce the amount of waste produced and recycle where possible. Food packaging, soft drinks containers and small boxes used for stationery products are classed as general waste. Some of this waste can be recycled e.g. aluminum cans, cardboard, plastic and paper;</p> <p>Hazardous waste: We will prevent the release of pollutants that can cause environmental damage. Any hazardous waste must be disposed of in accordance with the company's procedures for hazardous materials. Items classed as hazardous include cleaning agents, batteries and electrical waste; and</p> <p>Transportation: Where possible, we will promote the use of alternatives such as email or video/phone conferences.</p> <p>Bradburys Group view supplier adherence to ethical and legal practices as an integral part of our business operations and we expect all suppliers, regardless of size, spend or geographical location to adhere to our legal, ethical,</p>				
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		<p>environmental and employee-related standards.</p> <p>Our <i>Supplier Code of Conduct</i> sets forth the benchmark of business conduct that Bradburys Group expects all suppliers to demonstrate as a minimum requirement;</p> <p>Suppliers must seek to improve resource efficiency and reduce resource consumption including of raw materials, energy, water, and fuel;</p> <p>suppliers are expected to make reasonable efforts to eliminate or reduce levels of waste generated and to increase landfill diversion, reuse and recycling; and</p> <p>suppliers are encouraged to develop and use environmentally friendly innovations and practices that reduce negative environmental impacts.</p> <p>Our supplier Pre-Qualification Assessment incorporates sections on environmental management including an environmental impact assessment which we expect</p>				
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		organisations within our supply chain to comply with.				
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Anti-corruption

UNGC Principles	Commitment	Policies and Systems	Implementation	Measurement of Outcomes	SDG Impact	Goals for 2021-22
<p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.</p>	<p>The company's reputation for maintaining lawful business practices is of paramount importance. We recognise that all organisations are vulnerable to corruption which presents legal and reputational risks whilst eroding trust, we therefore have both ethical and legal obligations to prevent corruption in all forms, including extortion and bribery.</p> <p>We operate a zero-tolerance policy towards bribery and corruption including and are committed to acting fairly and with integrity in all of our business activities in compliance with all relevant international standards, anti-corruption laws and regulations including the UK Bribery Act, the UN United Nations Convention against Corruption and the United States Foreign Corrupt Practices Act ("FCPA"), legislation enacted under the OECD Convention on Combating Bribery of Foreign Public Officials in</p>	<p>Our <i>Anti-Bribery and Anti-Corruption Policy</i>, <i>Global Code of Business Conduct</i> and <i>Employee Handbook</i> affirms the company's stance on all forms of bribery and corruption including kickbacks, extortion, solicitation, gifts, hospitality, expenses, personal conflicts of interest, donations, political activities; public officials and money laundering.</p> <p>Our <i>Anti-Bribery and Anti-Corruption Policy</i> applies to all permanent and temporary employees of Bradburys Group. It also pertains to any individual or corporate entity associated with Bradburys Group or who performs functions in relation to, or for and on behalf of Bradburys Group, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons").</p>	<p>To enable our employees to identify instances of corrupt acts, we published a guidance document to supplement our <i>Anti-Bribery and Anti-Corruption Policy</i> which provides further information on the forms of corruption, likely scenarios of where one may be exposed to corrupt activities and also red flag indicators which are relevant to our industry.</p> <p>Our <i>Whistleblowing Policy</i> also encourages those who wish to disclose any information to the company including suspicions that they may have in relation to any looming misconduct of relating to any persons who may be intent on offering, promising or giving a bribe, or plans to request, agree to, receive or accept a bribe. This also includes reporting one's own misconduct.</p> <p>Senior personnel within the business receive annual online anti-corruption training.</p>	<p>To date, the company has not been the subject of investigation, legal cases, rulings, fines and other relevant events in relation to corrupt practices.</p> <p>The company's annual compliance review of its supply chain partners confirms no instances of corrupt behaviour.</p> <p>We recognise that corruption and data privacy are often linked as data is frequently collected as part of the process. In 2020, we achieved 'Cyber Essentials Plus' accreditation under the UK government initiative.</p>	 	<p>Our goals for the year ahead to expand upon our commitment to reducing corruption in all its forms, are to:</p> <p>Introduce annual online anti-corruption training for all employees;</p> <p>increase employee knowledge and understanding in respect of the implementation of our Anti-Bribery and Anti-Corruption Policy and our Whistleblowing Policy; and</p> <p>establish a confidential online whistleblowing system hosted by a third-party provider to encourage employees to raise concerns regarding unethical and unlawful conduct including any instance of corruption within the business.</p>

	<p>International Business Transactions ("OECD Convention"), which are elaborated upon further within our policy documentation.</p>	<p>The key legislation on which our <i>Anti-Bribery and Anti-Corruption Policy</i> is based is the UK Bribery Act 2010 and applies to the conduct of Bradburys Group in both the UK and overseas and while we recognise that what may be considered unlawful in one jurisdiction may be deemed as standard practice in another, therefore, we need to ensure that robust policies, systems, risk management due diligence and monitoring mechanisms are embedded into our own internal daily operating practices and also when engaging with external parties.</p> <p>All employees are required to adhere to the principles as set out in our <i>Anti-Bribery and Anti-Corruption Policy</i> including the requirement for accurate record keeping, adherence to stringent information security protocols and sanctions for breaching the policy requirements.</p> <p>Our <i>Global Code of Business Conduct, Anti-Bribery and Anti-Corruption Policy</i> and <i>Whistleblowing Policy</i> underlines the contractual responsibilities and moral</p>	<p>The company performs non-compulsory financial due diligence for management in trusting positions.</p> <p>Employees and supply chain partners have direct 24/7-365 access to senior management and the compliance team to report any instances of corruption within the business or its supply chain.</p> <p>In 2021, we submitted a Call to Action to the Executive Director of the UN Global Compact in support of our ongoing commitment to Anti-Corruption and the Global Development Agenda. The Call to Action is an appeal by the private sector urging Governments to:</p> <p><i>promote efficient and effective anti-corruption measures and to implement robust policies that to foster good governance;</i></p> <p><i>fully implement and enforce the tenets of the UN Convention against Corruption by strengthening anti-corruption policies, laws and enforcement mechanisms to create a level playing field and incentivize good behaviour;</i></p>			
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		<p>obligations of all employees and external parties affiliated to Bradburys Group in taking whatever reasonable steps are necessary to ensure compliance practices across the company, its supply chain activities and clients operations, to prevent, detect and report any suspected instances of bribery or corruption.</p> <p>Transparency and trust are essential prerequisites of responsible sourcing and our robust supplier vetting and due diligence assess corruption risks as a mandatory precondition for company's wishing to supply to Bradburys Group.</p> <p>Our <i>Supplier Code of Conduct</i> requires all potential suppliers to:</p> <p><i>Use reasonable practices to prevent bribery in all forms and support efforts to eradicate corruption;</i></p> <p><i>neither offer bribes, accept them, nor induce or permit any other party to make or receive bribes on its behalf, nor cause other parties to violate any</i></p>	<p><i>make a commitment to reduce corruption risks from procurement and contract processes of large-scale projects that are designed to support sustainable development;</i></p> <p><i>commit to engaging in competitive and transparent procurement processes through public advertising of all Government procurement cases;</i></p> <p><i>achieve greater transparency in relation to revenues received by Governments from private sector companies; and</i></p> <p><i>support corporate efforts to enhance anti-corruption implementation, corporate governance, innovative collective action, and public-private partnership initiatives.</i></p>			
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		<p><i>proposed, pending or current Bradburys Group procurement.</i></p> <p>Any violation of our Supplier Code of Conduct may result in any of the following, or other similar actions including asking the supplier to commission an audit of its organisation or its supply chain by an external assessor and to report on its findings; recommending or requiring corrective-action plans; or rendering the supplier as non-conforming which may result in the termination of a supplier agreement should appropriate corrective actions fail to be implemented within a reasonable timeframe.</p> <p>Our robust supplier due diligence process seeks to identify, prevent, mitigate and work towards eradicating any instances of corrupt practice within our supply chain through the analysis of risk intelligence data relating to Anti-Bribery and Corruption compliance, PEP and Sanctions Screening and Anti-Money Laundering checks.</p>				
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