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**UN Global Compact**  
Communication on Progress Policy





**INTELLIGENT**  
ENGINEERING

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**EPConsult Energies**

Riverside House  
27 Vauxhall Grove  
London SW8 1SY  
United Kingdom

T: +44(0) 20 7582 5555  
F: +44(0) 20 7582 5533  
[www.ep-consult.co.uk](http://www.ep-consult.co.uk)  
[info@ep-consult.co.uk](mailto:info@ep-consult.co.uk)

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# 1 Statement by the Chief Executive Expressing Continued Support

London, 10th November 2021

To our stakeholders:

As a member of the United Nations (UN) Global Compact, EPConsult Energies prides itself on upholding all 10 corporate sustainability principals. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption. By incorporating the 10 principles of the UN Global Compact into our policies and establishing a culture of integrity, EPEn does not only uphold the basic responsibilities to people and planet, but also sets the stage for long-term success.

Therefore, I am pleased to confirm that EPConsult Energies reaffirms its support to the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In our first 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 sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,


Martin H. Larsen

## 2 Description of Actions

### 2.1 Human Rights

**Principle 01: Businesses should support and respect the protection of internationally proclaimed human rights.**

**Principle 02: Businesses should make sure that they are not complicit in human rights abuses.**

#### 2.1.1 Introduction

EPConsult Energies Ltd (EPEn) is committed to operate all of its activities within the spirit and letter of all laws affecting its business and staff members. All employees (permanent or temporary) and sub-contractors must exercise the highest level of integrity, ethics and objectivity in actions and relationships which may affect EPEn or where the employee or sub-contractor represents or negotiates on behalf of EPEn. Employees and sub-contractors must not misuse the authority or influence of their positions in these relationships.

#### 2.1.2 Employment Policy

EPConsult Energies is a multicultural company that is firmly committed to the principle of diversification, which is stated in EPConsult Energies' Employment Policy. Personnel are employed solely on their qualifications and experience for the position for which they are employed.

EPConsult Energies does not subject any person to discrimination in employment including hiring salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, or social or ethnic origin.

EPConsult Energies suppliers and subcontractors treat their employees with respect and dignity.

No employee shall be, nor has been subject to physical, sexual or psychological harassment or abuse.

EPConsult Energies prohibits all forms of unlawful harassment, whether physical or verbal. Generally speaking, "harassment" being any form of unwelcome behaviour towards another person that is motivated by a characteristic protected by applicable law and has the purpose or effect of creating and intimidating, hostile or offensive work environment, such as unwanted sexual conduct, threats and offensive comments.

#### 2.1.3 Safety in the Workplace

Through a number of policies, and procedures, including the Business Ethics and Conduct Policy, EPConsult Energies ensures workers are provided a safe, suitable and sanitary work facilities.

EPConsult Energies confirms the elimination of ingredients, designs, defects or side-effects that could harm or threaten human life and health during manufacturing, usage or disposal of products, proven through the zero incidents and zero fatalities, as described in Table 2-1 below.

**Table 2-1: Incidents and Fatalities in the Last Three Years**

| Year | Incidents | Fatalities |
|------|-----------|------------|
| 2018 | 0         | 0          |
| 2019 | 0         | 0          |
| 2020 | 0         | 0          |

#### 2.1.4 Working with Human Rights

To ensure the commitment of our subcontractors to our human rights policy, the EPConsult Energies' team is trained to conduct a due diligence on the subcontractors, and further supervise and inform.

All subcontractors are required to have in place a policy for Business Ethics and Conduct covering as a minimum the sections covered in the EPEn policy section covering employees. In the event that no policy is in place (e.g. the organisation has not yet developed a policy or is too small) the subcontractor is required to provide EPEn with a Business Ethics and Commitment letter confirming acceptance of the EPEn policy and noting any exceptions.

## 2.2 Labour

**Principle 03: Businesses should uphold the freedom of association and effective recognition of the right to collective bargaining.**

**Principle 04: Businesses should uphold the effective abolition of child labour.**

**Principle 05: Businesses should uphold the elimination of all forms of forced and compulsory labour.**

**Principle 06: Businesses should uphold the elimination of discrimination in respect of employment and occupation.**

#### 2.2.1 Anti-Slavery Policy

EPConsult Energies Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain, as stated in our Anti-Slavery Policy. We have, and will continue to be, committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We are a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We comply with the minimum wage standards and ensure it is complied with along our stakeholders, subcontractors and suppliers.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

### 2.2.2 Diversity in EPConsult Energies

EPConsult Energies is a multicultural company that is firmly committed to the principle of diversification. Personnel are employed solely on their qualifications and experience for the position for which they are employed.

EPConsult Energies does not subject any person to discrimination in employment including hiring salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, or social or ethnic origin.

At EPConsult Energies, we believe that diversity provides us a competitive advantage. We collectively speak 15 different languages, and we ensure respect and equal opportunities are provided throughout the company.

## 2.3 Environment

**Principle 07: Businesses should support a precautionary approach to environmental challenges.**

**Principle 08: Businesses should undertake initiatives to promote greater environmental responsibility.**

**Principle 09: Businesses should encourage the development and diffusion of environmentally friendly technologies.**

The environmental section of the 10 UN Principles, is the area where EPConsult Energies can make the largest impact, not only by internally promoting sustainability, but also by providing our clients sustainable solutions.

As an independent technical consultancy working in the energy industry, we have served mostly oil and gas services across the globe for over twenty years. Our deep understanding of this sector and our customers, and of the opportunities and challenges they face, will help us transform demand for our products to transfer our knowledge to green energy. To increase the demand for the services provided by EPConsult Energies in the renewables sector, EPConsult Energies developed a Green Energy Transition Strategy which assesses the areas of knowledge of our experts and how these can be implemented into the green energy transition.

EPConsult Energies' commitment to the environment has aided in the decision to transition and contribute to our clients' transition to the use of greener and more sustainable energies, by prioritising more sustainable technologies during our projects, and encouraging more eco-friendly decision-making. We have taken the required measures so that we can better identify opportunities and the role that we can play in each area of the sector to help transform the energy industry. We are moving from an approach focused on types of services that our customers require. Through the implementation of this Green Energy Transition Strategy, we have increased by 20% the work in Renewable Energies, as we work to transition into green energy business, in step with society's progress towards the goal of the UN Net Zero Agreement on climate change.

EPConsult Energies is committed to becoming Carbon Neutral by 2050. This will be done through a three-step process. Firstly, EPE will calculate the current carbon footprint, following the ISO 14064 Standard, and will produce a report outlining the findings from the calculations. The second step includes an assessment of the company's carbon footprint and finding methods of reducing these. The third step will be the implementation of these methods through the company, and the continuous measuring of the carbon footprint to ensure the Carbon Neutral by 2050 goal is met. EPE will compute and record the company climate impact footprint in December 2021, as the first record.



## 2.4 Anti-Corruption

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

EPCConsult Energies works against corruption in all forms and has developed an anti-bribery and corruption section as part of the Business Ethics and Conduct Policy.

At EPCConsult Energies, we build relationships based on trust, and we are determined to maintain and enhance our reputation. For this reason, we never accept or pay bribes, including facilitation payments. Even unsubstantiated claims of bribery and corruption may damage EPCEn's reputation. All parties involved in EPCEn's business must comply with the anti-bribery and corruption laws of the countries where we operate.

EPCConsult Energies shall not authorise or condone any payment by an employee that is in the nature of an undisclosed commission, kickback or bribe to a third party for obtaining discretionary business, a contract, a competitive award or otherwise bestowing a special favour. Likewise, no payment shall be made to any sales agent, consultant or other independent third party with the intent or understanding that any part of such payment is to be used for any purpose or remitted to any other person or entity other than as described by the invoice or document supporting the payment. No deviation from this policy is authorised under any circumstance.

Employees must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain a business advantage. Employees must not allow anybody else to do so on their behalf.

Employees must not make facilitation payments. If an employee makes a payment because they genuinely believe their life, safety or liberty is at risk, this is not a facilitation payment but must be reported as if it were.

### 3 Measurement of Outcomes

EPCConsult Energies has measured the outcomes of the efforts and changes to continue supporting the 10 UN Principles.

#### 3.1 Human Rights

EPCConsult Energies continues to provide a healthy and safe environment for all workers, which is measured through the incidents and fatalities table as expressed in Table 3-1 below.

**Table 3-1: Incidents and Fatalities in the Last Three Years**

| Year | Incidents | Fatalities |
|------|-----------|------------|
| 2018 | 0         | 0          |
| 2019 | 0         | 0          |
| 2020 | 0         | 0          |

Following the UK safety COVID-19 guidelines in the workplace strictly, EPCConsult Energies has ensured health and safety in the workplace, and there have been no cases of COVID-19 transmission within EPCConsult Energies' premises.

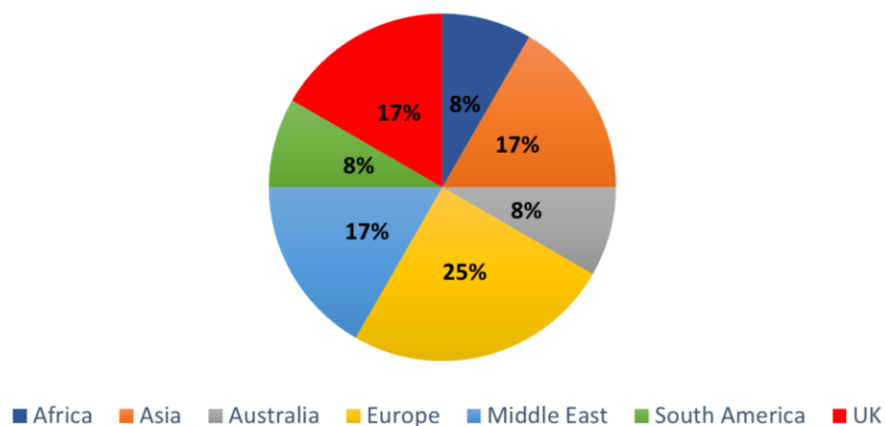
#### 3.2 Labour

Following EPCConsult Energies' employment policy and principle of diversity, EPCConsult Energies has increased the percentage of diversity in the company.

In closing the year 2020, EPCConsult Energies had a ratio of 2.7:7.3 women to men. The current ratio in closing the year 2021, the ratio is now 4.2:5.8, having introduced more gender diversity in the company.

At EPCConsult Energies, we collectively speak 15 different languages, and we cherish the diversity and respect for all we encourage within the company and to our stakeholders, which is particularly important as an international company working with clients world-wide. Figure 3-1 below shows the areas around the world where our employees come from.

**EPCConsult Energies' Employees' Nationalities**



**Figure 3-1: EPCConsult Energies' Employees' Nationalities**

### **3.3 Environment**

EPCConsult Energies has developed the Green Energy Transition Strategy. Additionally, EPEn has committed to the Net Zero Carbon Footprint by 2050 and has developed a methodology to achieve this goal.

EPCConsult Energies has reduced the number of business trips, and therefore flights taken by the employees, which is reducing the company's carbon footprint. Additionally, EPEn has implemented working from home, which significantly reduces the carbon footprint due to reducing employee travel.

### **3.4 Anti-Corruption**

As part of the Business Ethics and Conduct Policy, EPCConsult Energies has included a section on anti-bribery and corruption which includes employees, subcontractors, and all stakeholders of the company and rejects any type of corruption. EPEn has continued to successfully implement this policy, with no corruption and no bribery acts having been committed in or by the company.