



SEVENTY
NINTH™
GROUP

Southport Business Park, Wight Moss Way, Southport,
Merseyside, PR8 4HQ, United Kingdom

+44 (0) 151 316 0392

info@the79thgroup.co.uk

www.the79thgroup.co.uk

H.E. António Guterres Secretary-General

United Nations New York, NY 10017

USA

Dear Mr. Secretary-General,

I am pleased to confirm that The 79th Group supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our intent to implement those principles. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engage in collaborative projects which advance the broader development goals of the United Nations, particularly the sustainable development goals.

The UN Global Compact and its Principles have been embedded within the 79th Group's Sustainable Development Goals (SDG), Corporate strategy, policies and procedures.

The 79th Group has made a clear statement, to the Company's stakeholders and the general public, of our commitment to the Ten Principles of the United Nations Global Compact and this is incorporated all Company brochures and published materials.

As part of our commitment to support publicly accountability and transparency, we are complying with the requirement to submit our Communication of Progress (COP), of which this letter forms a part, together with a description of the practical actions that the Company has taken (or plan to take), and a measurement of outcomes. We commit to report on progress annually hereafter.

Sincerely yours,

Natalie BellisCEO



UN GLOBAL COMPACT COMMUNICATION ON PROGRESS (COP)

INTRODUCTION

The 79th GRP Limited (the Company) supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment, and anti-corruption, and the Company will implement those principles.

The Company is committed to making the UN Global Compact and its principles part of the strategy, policies, operations, and culture, and to participate in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

The 79th Group makes a clear statement of this commitment by incorporating the Ten Principles into its policies, communication materials, and in the Company's regular board reviews.

At the heart of the Global Compact is a conviction that business practices which are rooted in universal principles help the global marketplace to be more socially and economically inclusive, thus advancing collective goals of international cooperation, peace, and development.

Such goals are critical for the health and vibrancy of the private sector given the symbiotic relationship between business and society.

The Company recognises that this is a long-term process, and the Company will aim for a process of continuous improvement driven by the Company's stakeholders and senior leaders.

The Company will participate in ongoing activities and partnerships, dialogues, and learning.

The Company works closely with the communities in which it works, and are affected by the Company's activities, and will endeavour to ensure that those communities are impacted positively.

The Company will have policies in place which reflect the Ten Principles, and will expect the people, entities, and organisations with which the Company works, to act appropriately to support them.

REPORTING

The Company will submit, within one year of joining the UN Global Compact, and annually thereafter on an annual basis, a Communication on Progress (COP) that describes the Company's efforts to implement the Ten Principles.

The Company's COP will include a statement signed by the Chief Executive expressing continued support for the UN Global Compact and renewing the Company's ongoing commitment to the initiative and its principles.

The COP will include a description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the Company has taken (or plans to undertake) to implement the UN Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).

The COP will also include a measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

AUTHORISED REPRESENTATIVE

As an incorporated entity and member of UN Global Compact Network UK (GCN UK), the Company is entitled to appoint an individual to act on its behalf, as its authorised representative to exercise the Company's rights as a member of GCN UK, including its right to attend and vote at general meetings of GCN UK. David Webster is the Company's duly appointed representative.

CEO STATEMENT OF CONTINUED SUPPORT FOR THE UN GLOBAL COMPACT AND ITS TEN PRINCIPLES



HUMAN RIGHTS

The Company supports and respects the protection of internationally proclaimed human rights and has internal policies and procedures to ensure that it can identify and report breaches.

The Company undertakes due diligence checking on all its counterparties, 3rd party suppliers, and prospective clients to make sure that they are not complicit in human rights abuses.

In the Workplace

The Company recognises and celebrates the individual skills and attributes of all its personnel and provides safe and healthy working conditions,

The Company does not discriminate in personnel practices

The Company ensures that it does not use, directly or indirectly, forced labour or child labour,

The Company provides access to basic health, education and housing for Company personnel and their families, if these are not provided elsewhere.

The Company makes reasonable accommodations for all religious observance and practices.

In the Community

The Company ensures that its developments and activities do not involve the forcible displacement of individuals, groups, or communities,

The Company works to protect the economic livelihood of local communities

- by providing decent work that improve lives, especially for the poor or other vulnerable groups.
- by fostering opportunities for education to empower and help a company to have a broader and more skilled pool of workers in the future
- by contributing to the public debate interacting with all levels of government in the countries where the Company operates

Any use of security services to protect operations, must ensure that existing international guidelines and standards for the use of force are respected

Actions or relevant policies related to human rights

The Company has:

- A documented grievance mechanism
- A suggestion box available to all personnel
- Training for all personnel to raise awareness of human rights issues
- Regular consultations with, and updates for, stakeholders and potentially effected parties
- Allocated responsibility for respect and support of human rights to a nominated individual within the company
- HR and Company policies and procedures which are compliant with human rights principles
- Assessed human rights related risks in all countries of operation as part of the Company's enterprise-wide risk assessment (EWRA)
- Created 3rd party agreements which incorporate human rights principles
- A specific Human Rights reporting process within its policies and procedures
- Will maintain a record of, and track, all and any investigations, legal cases, rulings, fines, and other human rights issue related events
- Undertakes a periodic and retroactive review of the business activities, clients, introducers, and 3rd party suppliers



- A set of internal and external audits, which are, undertaken at least, annually
- Participation in voluntary anti-corruption initiatives

LABOUR

The Company upholds the freedom of association and the effective recognition of the right to collective bargaining

The Company supports the elimination of all forms of forced and compulsory labour

The Company supports the effective abolition of child labour

The Company supports the elimination of discrimination in respect of employment and occupation

The Company recognises that forced labour can take various forms and takes steps to ensure that its activities do not involve such actions, and that the Company has mechanisms for identifying and reporting such activities.

In the Workplace

The Company:

- Makes available employment contracts to all employees stating the terms and conditions of service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or cessation of work.
- Does not confiscate workers' identity documents.
- Prohibits business partners from charging recruitment fees to workers.
- Writes employment contracts in languages easily understood by workers, indicating the scope of and procedures for leaving the job.
- Is aware of countries, regions, industries, sectors, or economic activities where forced labour is more likely to be a practice.
- Ensures that workers in debt bondage or in other forms of forced labour are not engaged and, where found, provide for the removal of such workers from the workplace with adequate services and provision of viable alternatives.
- Institutes policies and procedures to prohibit the requirement that workers lodge financial deposits with the company.
- Ensures that large-scale development operations do not rely on forced labour in any phase
- Carefully monitors supply chains and subcontracting arrangements.
- Ensures Health and Safety compliance by Company personnel and 3rd party contractors

In the Community

The Company considers the role and function of the national employers' organisations and takes steps to ensure good labour-management relations, especially in those countries without an adequate institutional and legal framework for recognising trade unions and for collective bargaining.

Actions or relevant policies related to labour

The Company has:



- Policies that clearly state employee rights and responsibilities, their compensation, and benefits.
- A policy requiring business partners and suppliers to adhere to the labour principles
- Assessed labour-related risks in all countries of operation as part of the Company's enterprise-wide risk assessment (EWRA)
- A documented grievance mechanism
- A suggestion box available to all personnel
- Training for all personnel to raise awareness of human rights issues
- Health and safety policy and training
- Discrimination prevention policy
- Equal opportunities and remuneration for all Company personnel
- Demographics of management and employees by diversity factor
- Created 3rd party agreements which incorporate labour principles
- Mechanism to track how the business deals with labour related incidents or events
- Periodic and retroactive review by senior management
- An audit, review, track and report progress of policies
- A set of internal and external audits, which are, undertaken at least, annually
- Continual personal development training opportunities for all Company personnel

ENVIRONMENT

The Company supports a precautionary approach to environmental challenges

The Company undertakes initiatives to promote greater environmental responsibility

The Company encourages the development and diffusion of environmentally friendly technologies

The Company has documented the Company vision, policies, and strategies which include sustainable development: economic prosperity, environmental quality, and social equity.

The Company has sustainability targets and indicators (economic, environmental, social).

The Company has adopted voluntary charters, codes of conduct and practice internally and well through sectoral and international initiatives to measure and implement responsible environmental performance e.g., Green Mark accreditation.

The Company measures, tracks and communicates progress on incorporating sustainability principles into business practices, including reporting against global operating standards.

The Company assesses results and applies strategies for continued improvement and ensures transparency and unbiased dialogue with stakeholders.

Actions or relevant policies related to environment

The Company has:

- Assessed the environmental footprint and company impact and has gained Green Mark accreditation
- Assessed environmental risks in all countries of operation as part of the Company's enterprise-wide risk assessment (EWRA)
- Created Company ESG policies for environmental issues, prevention, and management of risks
- Training for all personnel to raise awareness of environmental issues
- Initiatives and programmes to reduce waste, and consumption of resources
- Uses environmentally friendly technologies e.g., solar water heating
- Implemented an environmental management system with objectives and procedures for evaluating progress, minimizing negative impacts, and transferring good practices
- Allocated responsibilities for environmental protection within the Company
- Created policies and procedures for dealing with environmental incidents
- Created 3rd party agreements which incorporate environmental principles



- Will maintain a record of, and track, all and any investigations, legal cases, rulings, fines, and other environment issue related events
- Will maintain a record to track specific progress made in the area of the environmental protection during the last reporting period
- Periodic review of environmental issues and progress by senior management
- A set of internal and external audits, which are, undertaken at least, annually
- Participation in voluntary environmental initiatives

ANTI-CORRUPTION

The Company works against corruption in all its forms, including extortion and bribery.

The Company has anti-corruption policies, policies, due diligence checks, and training in place.

Actions or relevant policies related to anti-corruption

The Company has:

- Created a statement of support for international and regional legal anti-corruption frameworks
- A publicly stated formal policy confirming zero-tolerance of corruption
- Assessed corruption-related risks in all countries of operation as part of the Company's enterprise-wide risk assessment (EWRA)
- Created Risk assessment procedures for potential areas of corruption as part of due diligence checks on all business activities, clients, counterparties, and 3rd party suppliers
- Created an outsourcing, and procurement policy incorporating anti-corruption regarding business partners
- Created 3rd party agreements which incorporate anti-corruption principles
- Communication (whistleblowing) channels and follow up mechanisms documented in personnel policies
- A set of internal and external audits, which are, undertaken at least, annually
- Management responsibility and accountability for implementation of the anti-corruption commitment or policy
- Participation in voluntary anti-corruption initiatives

MEASUREMENT OF OUTCOMES

With respect to the Company's actions to advance the Sustainable Development Goals (SDGs), the Company has:

Reviewed how the business deals with any and all incidents relating to the 10 principles corresponding SDGs

Committed to Continuous review of our opportunities and responsibilities as a business to support the 10 principles and SDGs, as well as ongoing and continuous review of where the company's priorities lie with respect to these goals

Implemented, set goals and indicators as a business with respect to continuous development and integration of the SDGs into our business model, our policies and procedures.

Set a goal of conducting internal and external audits of our environmental, Labour, human rights and anti-corruption performances as a business to address how we can continuously improve on these

Implementing an emerging best practices function



The activities described in the COP addresses the following Sustainable Development Goals (SDGs)

SDG 1: end poverty in all its forms everywhere

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

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

SDG4: ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

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

SDG 6: ensure availability and sustainable management of water and sanitation for all

SDG 7: ensure access to affordable, reliable, sustainable, and modern energy for all

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

SDG9: build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation

SDG 10: reduce inequality within and among countries

SDG 11: make cities and human settlements inclusive, safe, resilient, and sustainable

SDG12: ensure sustainable consumption and production patterns

SDG 13: take urgent action to combat climate change and its impacts

SDG 14: conserve and sustainably use the oceans, seas, and marine resources for sustainable development

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

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

SDG 17: strengthen the means of implementation and revitalize the global partnership for sustainable development