



The UN Global Compact

Communication on Progress 2021-2022

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Statement of Continued Support for the UN Global Compact from the Managing Director

I am pleased to express that Bradburys Global Risk Group confirms our continued 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.

Covid-19 has not been kind to us. Safeguarding our clients, their personnel and their operations has presented us with huge additional challenges including financial costs which have unfortunately been detrimental to the business in the short-term. Having said, that, the company is immensely proud to have been able to continue to support our clients through the pandemic.

The global Covid-19 pandemic has also regrettably impacted upon some of our projected goals as documented in our previous COP as it still continues to cause global disruption, however, our crisis management planning, ability to adapt along with our committed personnel who many have worked on the front-line during the pandemic have enabled us remain resilient whilst achieving as many of our goals as practically possible.

We recognise our moral obligation to operate beyond compliance and we are extremely grateful for the opportunity to continue to learn from the UN Global Compact, especially through the multitude of remote events which continue to provide invaluable learning and engagement opportunities whilst learning from other
act members so that we can continue to further advance upon;
our corporate sustainability strategy and the broader development
goals of the United Nations including the Sustainable Development Goals (SDGs).

Roger Marshall
Managing Director, Bradburys Global Risk Group



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




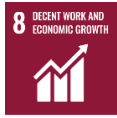

We welcome feedback on its contents.

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 Goals	How the implementation of policy, procedures and corporate practices help us to support the UN Sustainable Development Goals.
Goals for the year ahead	Our objectives to further align the UN Global Compact principles for the year ahead.

Human Rights







UNGC Principles	Commitment	Policies and Systems	Implementation	Measurement of Outcomes	SDG Goals	Goals for the year ahead
<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>Our employee induction programme has been revised to include our Global Human Rights Policy, Dignity at Work Policy and Equal Opportunities Policy.</p>	<p>Despite the impact of the global Coronavirus pandemic which has prevented us with achieving a small number of our intended goals, Bradburys Group has continued to achieve various measurable to advance and progress upon our previous COP.</p> <p>For a third consecutive year, in 2022 we achieved SafeContractor accreditation for achieving excellence in health and safety within the workplace, awarded by a leading third-party industry accreditation scheme following a robust and lengthy audit of our health and safety documentation, policies and procedures which are compared against the SafeContractor Charter Standards.</p> <p>In 2022, Bradburys Group publicly signed the open letter to integrate human rights into management education.</p>	<div>  <p>Target 1.1; 1.4</p> </div> <div>  </div> <div>  <p>Target 5.1; 5.5</p> </div> <div>  <p>Target 8.5; 8.6; 8.7; 8.8</p> </div> <div>  <p>Target 17.16; 17.17</p> </div>	<p>Each year, the company sets itself goals which are realistically achievable. Our core focus areas for the year ahead are to:</p> <ol style="list-style-type: none"> 1. Transition from remote online human rights awareness and training to a classroom-based delivery. 2. Deliver annual human rights refresher training for all employees. 3. Introduce classroom-based diversity and inclusion training upon induction to the company with annual refresher training. 4. Achieve The UK Ministry of Defence Employers Recognition Scheme Gold Award; 5. Develop partnerships with two mental health foundations including one of which supports former service personnel;

	<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>Global Human Rights Policy;</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>Through the GBC we have implemented a whistleblowing system.</p> <p>We achieved Safe PQQ accreditation as a Sustainable and Compliant Security and Risk Management Provider for a third consecutive consecutive year in 2022. The following key business sustainability areas of Bradburys Group were assessed to achieve the re-accreditation:</p> <p>Finance; Environment; Quality Management; Equality; Modern Slavery; Anti-bribery; GDPR; Right to Work</p> <p>In 2021, we publicly signed the Partnership for Global LGBTI Equality (PGLE) to express our open support for the PGLE and the United Nations Standards of Conduct for Business Tackling Discrimination against LGBTIQ+ People. Through our enduring commitment to the</p>		<p>6. 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 reporting procedures relating to</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>Due to the pandemic and restrictions upon travel along with social distancing, our transition from remote online human rights awareness and training to classroom-based delivery has been added to our goals for the forthcoming year.</p>	<p>United Nations Global Compact on protecting human rights, we maintain a fundamental principle of how we intend to move forward in business in respect of creating an inclusive environment for the LGBTIQ+ community.</p> <p>In 2021, we publicly signed the Statement of Support for the Women's Empowerment Principles. Established by UN Global Compact and UN Women, the WEPs are informed by international labour and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women's empowerment.</p> <p>In 2021 we introduced employee knowledge testing on the company's policies including our Global Code of Business Conduct and Human Rights Policy Statement.</p> <p>As a Disability Confident employer, we offer all applicants with a disability are guaranteed an interview if the role criteria is met.</p>		
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	instances of human rights abuse resulting from our direct or indirect actions.			<p>As a Silver Award winner of the Defence Employer Recognition Scheme, applicants with Defence background including former service personnel, veterans, reservists and those who have been injured are guaranteed an interview if the role criteria is met.</p> <p>In 2022, Bradburys Group were accepted as a member of the Good Business Charter (GBC), an initiative of the Good Business Foundation, a charity registered in England and Wales.</p> <p>Through the GBC we have implemented a whistleblowing system.</p> <p>In March 2021, Bradburys Group signed the Open Letter to Integrate Human Rights into Management Education.</p> <p>The company's annual compliance review of its supply chain partners confirms no instances of human rights violations.</p> <p>To date, no human rights violations or potential infringements have been reported or identified within the business.</p>		
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Labour

UNGC Principles	Commitment	Policies and Systems	Implementation	Measurement of Outcomes	SDG Goals	Goals for the year ahead
<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>The security industry; and more so the operational security environment has unfortunately long been a predominantly male dominated sector. Bradburys Group have been involved in advocating for more female representation within the sector for a number of years, especially within our own organisation. The industry has a long way to go but progression is clearly evident and as we continue to identify gaps, implement positive change and drive gender equality and human rights within the workplace, supply chains and the wider community.</p> <p>Despite the impact of the global Coronavirus pandemic which has prevented us with achieving a small number of our intended goals, Bradburys Group has continued to achieve various measurable to advance and progress upon our previous COP.</p> <p>In 2021, we publicly signed the Statement of Support for the Women's Empowerment Principles.</p>	 Target 1.1; 1.4   Target 5.1; 5.5  Target 8.5; 8.6; 8.7; 8.8   Target 17.16; 17.17	<p>Our goals for the year ahead across the area of labour rights are to:</p> <ol style="list-style-type: none"> 1. Introduce classroom-based equal opportunities training upon induction to the company with annual refresher training. 2. Achieve The UK Ministry of Defence Employers Recognition Scheme Gold Award. 3. Increase the number of role swapping weeks throughout the year to provide employees variation within the workplace. 4. Progress to the UK government's 'Disability Confident Leader' status through an independent external assessment of our internal policies and practices.



	<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>Established by the UN Global Compact and UN Women, the WEPs are informed by international labour and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women's empowerment.</p> <p>For a third consecutive year, in 2022 we achieved SafeContractor accreditation 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>In 2022, Bradburys Group were accepted as a member of the Good Business Charter (GBC), an initiative of the Good Business Foundation, a charity registered in England and Wales.</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>	<p>In 2022, we achieved accreditation with Safety Schemes in Procurement (SSIP), approved by the UK Health and Safety Executive (HSE). The accreditation demonstrates that Bradburys Group is a safe, stable and ethical business to work with.</p> <p>We have commenced a phased process of our Employer-Supported Volunteering (EVS) which provides employees with two additional paid days per year to volunteer for a charity of their choice within their local communities.</p> <p>We have introduced unconscious bias training for management.</p> <p>In 2021, we publicly signed the Partnership for Global LGBTI Equality (PGLE) to express our open support for the PGLE and the United Nations Standards of Conduct for Business Tackling Discrimination against LGBTIQ+ People. Through our enduring commitment to the United Nations Global Compact on protecting human rights, we maintain a fundamental principle of how we intend to move forward in business in respect of creating an</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>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>inclusive environment for the LGBTIQ+ community.</p> <p>We have commenced a phased incentive programme to further align employee remuneration through incentive programmes.</p> <p>We have commenced develop a transparency scheme for employees to learn how internal processes work including succession planning and performance management.</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 found no instances of forced or compulsory labour, nor any indication of the exploitation of child labour within the business.</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>		
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				<p>In 2021, we publicly signed the the Partnership for Global LGBTI Equality (PGLE) to express our open support for the PGLE and the United Nations Standards of Conduct for Business Tackling Discrimination against LGBTIQ+ People.</p>		
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Environment

UNGC Principles	Commitment	Policies and Systems	Implementation	Measurement of Outcomes	SDG Goals	Goals for the year ahead
<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>Despite the impact of the global Coronavirus pandemic which has prevented us with achieving a small number of our intended goals, Bradburys Group has continued to achieve various measurable to advance and progress upon our previous COP.</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; Evaluation and Risk Management; Planning; Implementation and Monitoring; and Review and Audit for continuous improvement.</p>	<div>   </div> <p>Target 17.16; 17.17</p>	<p>Our goals for the year ahead to improve upon our environmental actions and responsibilities, are to:</p> <ol style="list-style-type: none"> 1. Continue to reduce waste along with our impact on the environment. 2. Introduce environmental awareness and responsible action training upon induction to the company with annual refresher training. 3. Develop and roll-out an Environmental Toolkit to support the Environment Management System. 4. Increase employee engagement in the implementation of our environmental policy. 5. Implement a cycle to work scheme for employees. 6. Commit to at least one project which supports climate change.

	<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>We have increased remote online meetings due to the pandemic. The company plans to maintain this method of communication going into the future to reduce travel requirements.</p> <p>In 2022, Bradburys Group were accepted as a member of the Good Business Charter (GBC), an initiative of the Good Business Foundation, a charity registered in England and Wales, an accreditation that seeks to raise the bar on business practices for employees, tax, the environment, customers and suppliers.</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 Goals	Goals for the year ahead
<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>Despite the impact of the global Coronavirus pandemic which has prevented us with achieving a small number of our intended goals, Bradburys Group has continued to achieve various measurable to advance and progress upon our previous COP.</p> <p>We publicly signed The United Nations Anti-Corruption Call to Action March 2021.</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.</p>	<div>  <p>Target 16.5</p> </div> <div>  <p>Target 17.16; 17.17</p> </div>	<p>Our goals for the year ahead to expand upon our commitment to reducing corruption in all its forms, are to:</p> <ol style="list-style-type: none"> 1. Introduce annual online anti-corruption training for all employees. 2. increase employee knowledge and understanding in respect of the implementation of our Anti-Bribery and Anti-Corruption Policy and our Whistleblowing Policy.

	<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</i>, <i>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>	<p>In 2022, Bradburys Group were accepted as a member of the Good Business Charter (GBC), an initiative of the Good Business Foundation, a charity registered in England and Wales, an accreditation that seeks to raise the bar on business practices for employees, tax, the environment, customers and suppliers.</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>applicable anti-corruption or antibribery laws;</i></p> <p><i>not engage in, or assist any third party with any money laundering, terrorist financing or other financial crime activities;</i></p> <p><i>not offer or provide money or anything of value to any person if the circumstances indicate that it is probable that all or part of the money or other item of value is being given to another individual or entity in order to influence actions or to obtain a competitive advantage;</i></p> <p><i>not offer gifts to Bradburys Group personnel or representatives under circumstances which create the appearance of impropriety;</i></p> <p><i>comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services; and not share or exchange any prices, costs or other competitive information, or undertaking of any collusive conduct with any other third party to Bradburys Group with respect to any</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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